

Maryland WIOA State Plan – 2018 DRAFT Revisions  
for  
Public Comment

**Draft disseminated January 10, 2018**

## **Executive Summary**

### **Changing Maryland for the Better**

Providing businesses with the skilled workforce they need to compete in the global, regional, and local economies is central to Governor Hogan’s vision and to his charge to ensure that Maryland is “open for business.” Maryland’s workforce system provides that talent pipeline through a partnership of State and local partners, businesses, economic development, education, and community stakeholders.

In 2015, to ensure that the workforce system efficiently and effectively meets the needs of both the businesses and the jobseekers that it serves, Governor Hogan directed Maryland’s workforce agencies to jointly develop the State’s workforce plan. This marked the first time that Maryland’s DLLR, the DHS (then the DHR), the MSDE, the GWDB, and local workforce partners joined together to develop the operational components of Maryland’s plan in a truly collaborative way. At the time, the Governor’s charge to these agencies was to develop a plan that maximizes state resources to deliver outstanding customer service to workers and businesses that are vital to Maryland’s economic growth and prosperity. The agencies were further encouraged to collaborate and innovate to ensure that Maryland’s citizens have access to quality workforce training and employment opportunities.

In response to the Governor’s charge, the departments, in conjunction with their local partners, developed a more collaborative approach to operations that has led to a strengthened workforce system in Maryland. This approach acknowledges that no one agency or entity can deliver all the services needed for customers of the system. It also recognizes that investments must be made and provides opportunities for additional partners to deliver innovative services that go above and beyond the minimum requirements of WIOA.

As Maryland seeks to strengthen and enhance its workforce system through the implementation of this State Plan, success requires a commitment to innovation, collaboration, and a true systems approach among the State’s many workforce partners. In order to guide the WIOA Partners in this work, the GWDB worked with the WIOA Alignment Group and other key stakeholders to set forth a clear vision, goals, and measurable achievements to help define success and lay the core foundation of the State’s workforce system.

In keeping with the workforce system’s commitment to “place people before performance” and Governor Hogan’s principles of economic development and jobs, government reform and improving the quality of life for Marylanders, the *Benchmarks of Success*’ goals and corresponding benchmarks are focused to drive a system committed to increasing the earning capacity of Marylanders by maximizing access to employment, skills and credentialing, life management skills, and supportive services.

To meet this vision, Maryland’s workforce system has commitment to work across agencies together towards five key goals:

1. Increase the earning capacity of Maryland's workforce system customers by maximizing access to employment;
2. Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of skills and credentialing;
3. Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of life management skills;
4. Increase the earning capacity of Maryland's workforce system customers by eliminating barriers to employment; and,
5. Strengthen and enhance the effectiveness and efficiency of Maryland's workforce system.

The State Plan and the *Benchmarks of Success* together focus the State and its workforce entities to think systematically about how workforce services are delivered. They reflect Maryland's commitment to serving customers who need the system's support the most. In turn, this will create a more prepared, responsive workforce for Maryland's businesses.

## I. WIOA STATE PLAN TYPE

**Unified or Combined State Plan.** Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.

**Unified State Plan.** This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and VR programs. **No**

**Combined State Plan.** This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Literacy Act, and VR programs, as well as one or more of the optional Combined State Plan partner programs identified below. **Yes**

**Indicate which Combined State Plan partner program(s) the State is electing to include in the plan:**

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) **No**
- TANF program (42 U.S.C. 601 et seq.) **Yes**
- Employment and Training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4))) **No**
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o)) **No**
- Trade Adjustment Assistance for Workers programs (activities authorized under chapter 2 of title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.)) **Yes**
- JVSGs program (programs authorized under 38, U.S.C. 4100 et. seq.) **Yes**
- UI programs (programs authorized under State unemployment compensation laws in accordance with applicable Federal law) **Yes – will be new to Combined State Plan**
- SCSEP (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.)) **Yes – will be new to Combined State Plan**
- Employment and training activities carried out by the Department of Housing and Urban Development **No**
- Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) **Under consideration.**
- RExO3 (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532)) **Yes**

## Commonly Used Abbreviations

AJC	American Job Center
BLS	Bureau of Labor Statistics
DHS	Department of Human Services
DLLR	Department of Labor, Licensing and Regulation
DORS	Division of Rehabilitation Services
DPSCS	Department of Public Safety and Correctional Services
DUI	Division of Unemployment Insurance
DWDAL	Division of Workforce Development and Adult Learning
FIA	Family Investment Administration
FLC	Foreign Labor Certification
FY	Fiscal Year
GWDB	Governor's Workforce Development Board
JVSG	Jobs for Veterans State Grant
LDSS	Local Department of Social Services
LEP	Limited English Proficiency
LVERs	Local Veterans Employment Representative
MORA	Maryland Office for Refugees and Asylees
MOU	Memorandum of Understanding
MRI	Maryland Re-entry Initiative
MSDE	Maryland State Department of Education
MSFW	Migrant and Seasonal Farmworker
MWA	Maryland Workforce Association
MWE	Maryland Workforce Exchange
OFP	Office of Fair Practices
OWD	Office of Workforce Development
OWIP	Office of Workforce Information and Performance
PIRL	Participant Individual Record Layout
POAC	Professional Outplacement Assistance Center
PY	Program Year
RA	Registered Apprenticeship
RESEA	Reemployment Services and Eligibility Assessment
RExO	Re-Integration of Ex-Offenders
ROW	Reemployment Opportunity Workshop
RSA	Resource Sharing Agreement
SCSEP	Senior Community Service Employment Program
TANF	Temporary Assistance for Needy Families
TCA	Temporary Cash Assistance
UI	Unemployment Insurance
USDOL	U.S. Department of Labor
VR	Vocational Rehabilitation
WIA	Workforce Investment Act
WIOA	Workforce Innovation and Opportunity Act
WPR	Work Participation Rate

## **II. STRATEGIC ELEMENTS**

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs.

## **II. STRATEGIC ELEMENTS**

### *Summary*

Maryland has a diverse economy, which helped dampen the blow of the Great Recession, and assisted in the economic recovery. Workers in Maryland are employed in a wide swath of industries, most of which grew from 2015 to 2016.

Despite being one of the younger states, Maryland, like all other states, will face the demographic shift in the labor force as the “Baby Boomer” generation ages out of the labor force. Fortunately, Maryland is poised to overcome this demographic hurdle, with a young labor force, as well as advances in productivity and technology.

The diversity in Maryland’s economy is further evidenced by the 21 growth industry subsectors in Maryland. Workers can find jobs in many different occupations that are projected to grow into the future as well. These opportunities exist across educational levels, providing meaningful employment for a diverse population.

### **(1) Economic and Workforce Analysis**

(A) *Economic Analysis.* The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State.

#### *Economic Indicators*

In 2016, National GDP grew at a rate of 1.6 percent (real GDP).<sup>i</sup> This growth can be attributed mostly to the Information, Professional scientific and technical services, and Healthcare and social assistance sectors. Maryland, by contrast, grew at a rate of 1.3 percent (real GDP) from 2015 to 2016 (See Graph 1).<sup>ii</sup> The growth in Maryland was driven by a similar group of industries, but also including the Construction, and Management of companies and enterprises sectors (See Table 1).<sup>iii</sup>

Maryland’s GDP in 2016 has a similar distribution across industries, with the largest change in industry share being 0.2 percentage points (Manufacturing, Real estate and rental and leasing, and Professional scientific and technical services) (See Table 1).<sup>iv</sup> Government represents the largest single sector in Maryland’s GDP in 2016; however, the Government share of GDP has decreased by 0.1 percentage points as compared to 2015 (See Graph 2).<sup>v</sup>

As Maryland continues to move onward with the recovery from the Great Recession, Maryland's diverse economy continues to be a strength. Only four of twenty industry sectors (Mining, Manufacturing, Wholesale trade, and Educational services) saw declines in GDP from 2015 to 2016 (See Table 1).<sup>vi</sup>

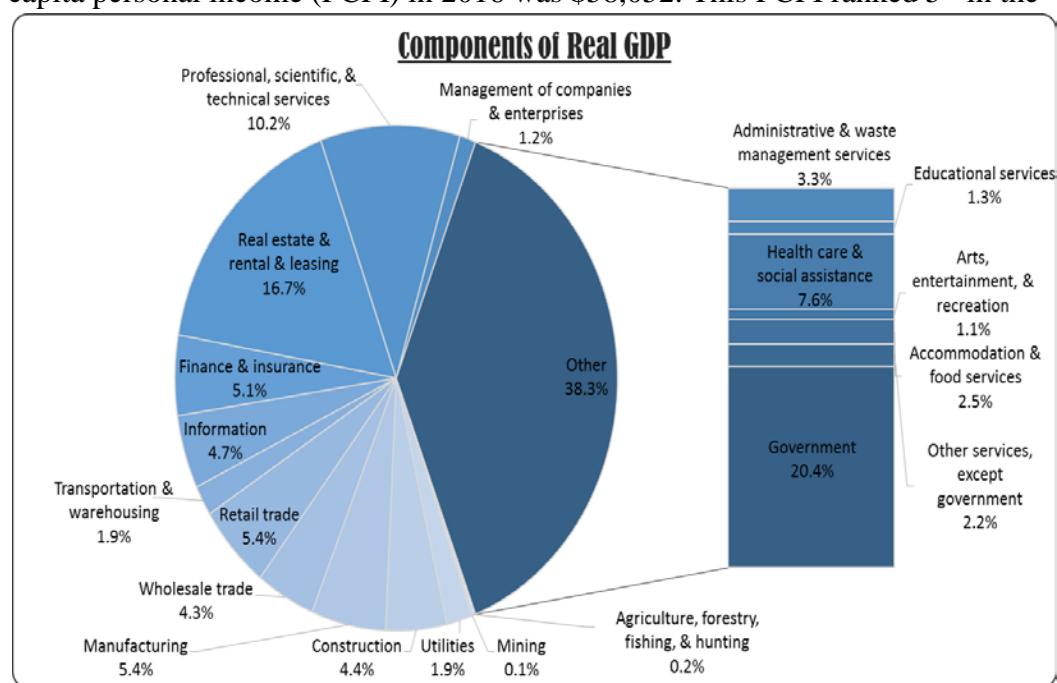
Maryland Real GDP by industry (2015 – 2016) (millions of chained 2009 dollars)			
Industry	2015	2016	Change
Agriculture, forestry, fishing, and hunting	662	707	6.8%
Mining	312	255	-18.3%
Utilities	6,012	6,252	4.0%
Construction	14,195	14,802	4.3%
Manufacturing	18,511	18,151	-1.9%
Wholesale trade	14,422	14,411	-0.1%
Retail trade	17,822	18,148	1.8%
Transportation and warehousing	6,282	6,445	2.6%
Information	15,059	15,684	4.2%
Finance and insurance	16,868	17,076	1.2%
Real estate and rental and leasing	55,641	55,731	0.2%
Professional, scientific, and technical services	32,883	33,956	3.3%
Management of companies and enterprises	3,886	3,952	1.7%
Administrative and waste management services	10,749	11,120	3.5%
Educational services	4,361	4,298	-1.4%
Health care and social assistance	24,921	25,243	1.3%
Arts, entertainment, and recreation	3,575	3,674	2.8%
Accommodation and food services	8,168	8,179	0.1%
Other services, except government	7,284	7,410	1.7%
Government	67,401	67,851	0.7%

Table 1: Maryland Real GDP Change by Industry; Source: BEA, 2016

Maryland's per capita personal income (PCPI) in 2016 was \$58,052. This PCPI ranked 5<sup>th</sup> in the United States and 118

percent of the national average of \$49,246. The 2016 PCPI reflected an increase of 3.2 percent from 2015.<sup>vii</sup>

In terms of other economic indicators, the number of new housing



Graph 1: Components of GDP by Industry; Source: BEA, 2016

units authorized by building permits for 1-unit structures in Maryland decreased .44 percent from 11,108 in 2015 to 11,059 in 2016. The number of multiple unit housing buildings increased slightly overall, from 6,101 in 2015 to 6,162 in 2016, a one percent increase. Average weekly hours of production for employees on manufacturing payrolls in Maryland increased from an annual average of 39.8 hours in 2015 to an annual average of 40.2 hours to 2016.<sup>viii</sup> In examining exports, Maryland exported \$9.3 billion in total exports of merchandise with \$3.2 billion exported to the United States' Free Trade Partners in 2016.<sup>ix</sup> Maryland's biggest market for exports was Canada with over \$1.4 billion exports in 2016.<sup>x</sup> The largest export industry was Chemicals with over \$1.9 billion in exports in 2016, which was followed by Transportation Equipment at a value of over \$1.6 billion in exports.<sup>xi</sup>

Maryland's industries also saw large gains in employment from 2015 to 2016. The annual average employment for all nonfarm industries in Maryland increased by 33,800 from 2015 to 2016.<sup>xii</sup> Over the past ten years, the employment level has risen by 92,500 jobs -- a 3.5 percent gain.<sup>xiii</sup> Private employment has grown along a similar trend growing 3.2 percent since 2007 from 2,135,700 to 2,203,800, and adding 33,100 jobs from 2015 to 2016.<sup>xiv</sup> Healthcare and social assistance, in addition to Construction, drove the growth with over 6,000 jobs added in each respective industry (See Table 2).<sup>xv</sup> Only three industry sectors saw a decline in annual average employment from 2015 to 2016: Information, Manufacturing, along with Mining and Logging (See Table 2).<sup>xvi</sup>

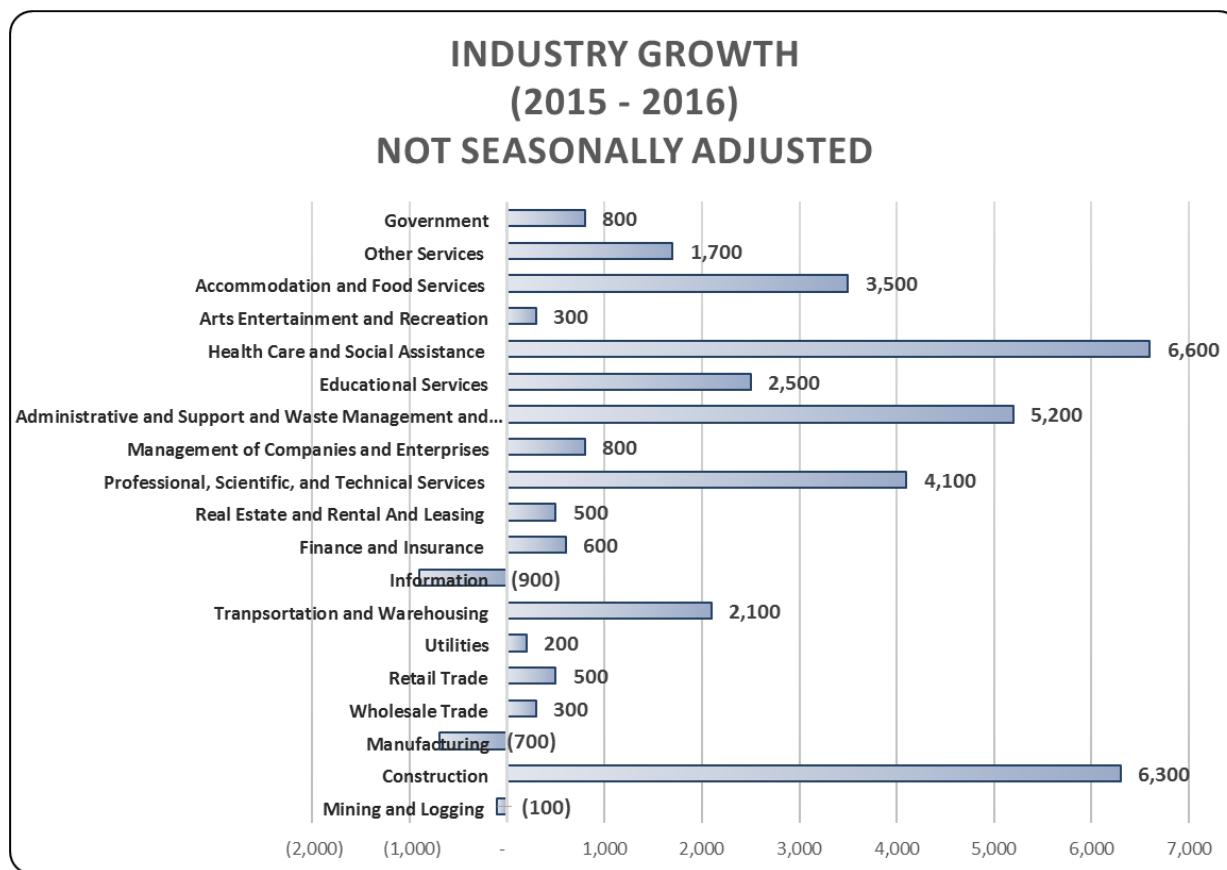
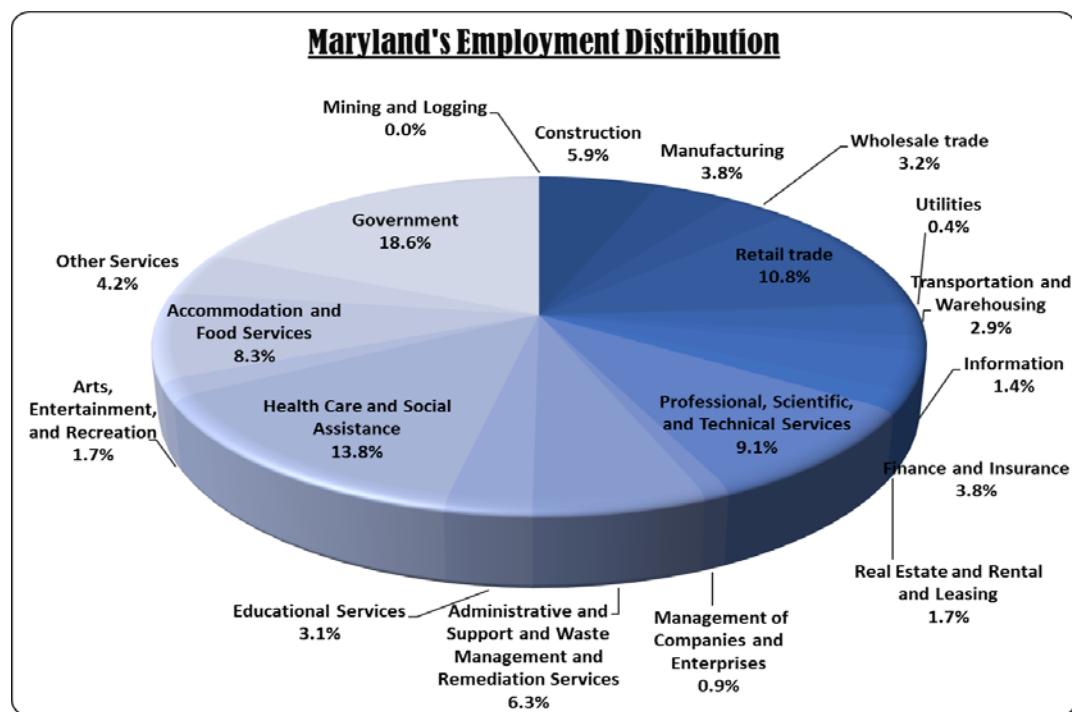


Table 2: Industry Growth; Source: BLS, 2015, 2016

Maryland's economy is diverse in its industry composition, providing a variety of opportunities at all skill and education levels. However, some industry sectors garner more the workforce than others. The public sector accounts for almost 19 percent of the workforce and almost 14 percent of Maryland's workforce is employed in the Health care and social assistance sector (See Graph 3).<sup>xvii</sup>

Maryland's 2016 annual total employment had an average of 2,707,800 as measured by the Current Employment Statistics (CES) program. This was an increase from 2015 of 1.3 percent.<sup>xviii</sup> This growth was primarily driven by growth in the private sector, or more specifically the Health care and social assistance, construction, Administrative and support and waste management services (See Table 2). From 2015 to 2016, Information experienced the sharpest decline in employment, decreasing by 900 See Table 2).<sup>xix</sup> Over the same time frame, Health care and social assistance exhibited an impressive increase of 6,600 jobs (See Table 2).<sup>xx</sup> Assessing Maryland's recovery from the employment lows in 2010, all major industries except manufacturing, information, other services, and mining and logging had increased in employment by 2016.<sup>xxi</sup> Furthermore, almost half of the industries have met or exceeded 2008 pre-recession employment levels.<sup>xxii</sup>



Graph 2: Maryland's Employment Distribution by Industry; Source: BLS, 2016

(ii) Emerging Demand Industry Sectors and Occupations. Provide an analysis of the industries and occupations for which demand is emerging.

#### *Growth & Emerging Industries*

To further examine industries providing employment opportunities in Maryland, data from Maryland's Quarterly

Census of Employment Wages (QCEW) Program was analyzed; however, it is important to note that the data only covers workers covered by the Unemployment Insurance (UI) law of Maryland and the unemployment compensation for federal employees (UCFE) program.

Industry	Establishments	Average Employment	Location Quotient	Employment Chg.
Construction	16,363	161,014	1.35	4.3%
Real estate and rental and leasing	6,639	44,977	1.19	0.7%
Professional and technical services	28,925	246,901	1.57	2.0%
Administrative and waste services	11,894	169,767	1.07	3.9%
Educational services	2,785	64,422	1.31	1.8%
Health care and social assistance	17,219	361,732	1.08	1.9%
Arts, entertainment, and recreation	2,478	45,465	1.14	0.1%
Other services, except public administration	19,495	90,739	1.16	1.2%

*Table 3: Maryland's Growth Industries*

#### *Growth Industries*

Using the growth in private employment from 2015 to 2016 in combination with Location Quotients (LQ) greater than one, eight growth industries were identified for the state of Maryland (See Table 3). Some top growth industries in Maryland include Construction with a 4.3 percent gain in employment and is highly concentrated (1.35) compared to the United States (See Table 3). The growth industry with the highest concentration is the Professional and technical services (1.57) with an employment growth of 4,741 (2 percent) (See Table 3).

#### *Emerging Industries*

Industry	Establishments	Average Employment	Location Quotient	Employment Chg.
Agriculture, forestry, fishing and hunting	609	5,254	0.23	2.0%
Transportation and warehousing	3,871	75,117	0.89	2.9%
Finance and insurance	8,358	94,878	0.92	0.7%
Management of companies and enterprises	689	25,988	0.66	4.3%
Accommodation and food services	12,104	226,889	0.96	2.2%

*Table 4: Maryland's Emerging Industries*

Using the growth in private employment from 2015 to 2016 in combination with Location Quotients (LQ) less than or equal to one, five emerging industries were identified. Management of companies and enterprises industry experienced the largest growth in employment from 2015 to 2016 of 4.3 percent and was followed by Transportation and warehousing with a growth of 2.9 percent (See Table 4).

#### *Target Industries*

The Maryland Department of Labor, Licensing, and Regulation's Division of Workforce Development and Adult Learning (DWDAL), based on research conducted by the Division's

Labor Market Information Team, has had the occasion to recently develop a list of proposed industry sectors for Maryland.

The Department is also required, under Maryland statute, to consult with the Maryland Economic Development Commission in the evaluation of potential employment and economic growth of Maryland's industry sectors; and, to make recommendations regarding eligible industry sectors to the Maryland Economic Development Assistance Authority and Fund (MEDAAF). The Authority has established the following industry sectors as those deemed to be eligible to receive financial assistance through MEDAAF.

Those industries include:

<b>MEDAAF Eligible Industry Sectors</b>	
Agriculture and Resource Based Industries	Aerospace, Aeronautics, Unmanned Aerial Systems
Distribution, Warehousing, Transportation, Logistics	Environmental Technology, Renewable Energy, and Energy Production
Businesses with U.S. or regional operations in Maryland	Information Technology, Telecommunications, Cyber Security
Manufacturing	Biotechnology, Health Care Technology, Pharmaceuticals
Financial Services	

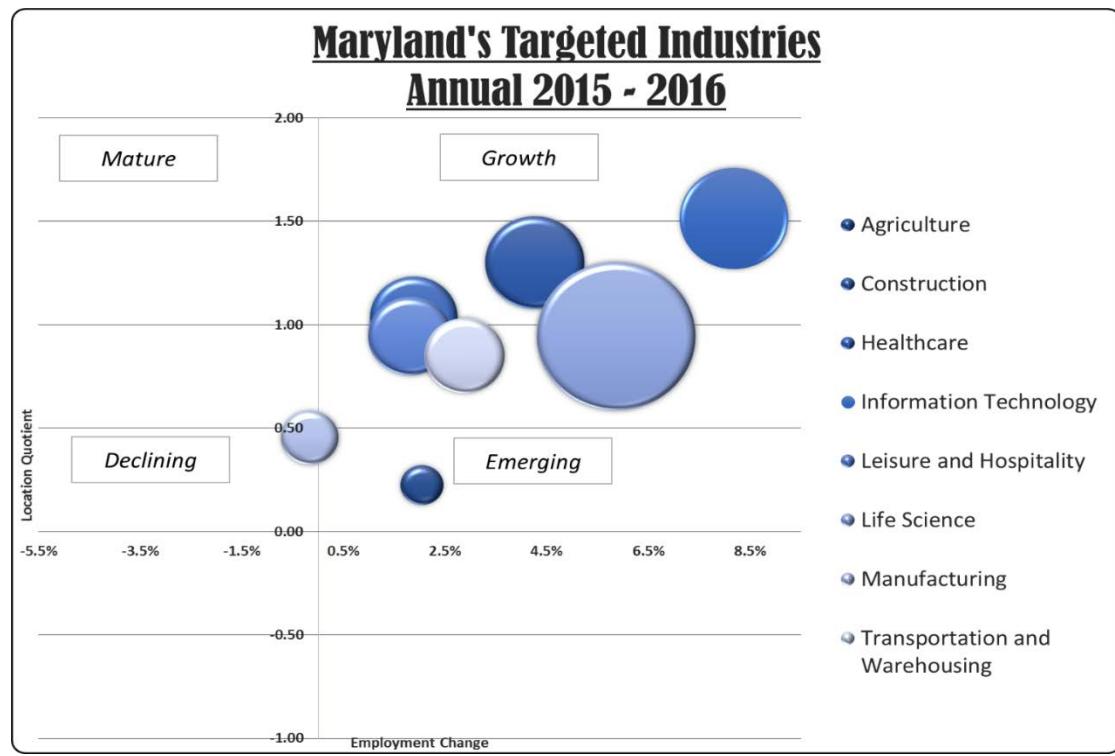
*Table 5: MEDAAF Eligible Industry Sectors*

In an attempt to coordinate workforce development and economic development efforts, and to further integrate the services provided by WIOA Partners and economic development agencies within the State, the following demand-driven industry clusters have been identified:

<b>Maryland Workforce Targeted Industry Sectors</b>
Healthcare
Information Technology / Cybersecurity
Biotechnology (Life Science)
Distribution, Warehousing, and Transportation
Construction
Agriculture and Forestry
Manufacturing
Hospitality and Tourism

*Table 6: Maryland Workforce Targeted Industries*

All of the above-listed industry sectors or clusters, with the exception of manufacturing, are continuing to grow in Maryland (See Graph 4). Leisure and Hospitality and Transportation and Warehousing are emerging industries and Life Sciences and Information Technology are strong growth industries in Maryland for 2016 (See Graph 4).



Graph 3: Maryland's Targeted Industries

#### Growth & Emerging Occupations

Similar to growth and emerging industries, the same methods are used to determine growth and emerging occupations. Using the Occupational Employment (OES) data for Maryland and its associated Location Quotients (LQ) are used in determining employment concentration, growth, and emerging occupations.

#### Growth Occupations

Occupation Title	2016 Employees	% Change	LQ
Management Occupations	151,790	5.2%	1.14
Business and Financial Operations Occupations	163,090	1.1%	1.19
Computer and Mathematical Occupations	123,660	5.7%	1.58
Architecture and Engineering Occupations	58,330	3.7%	1.24
Life, Physical, and Social Science Occupations	41,850	1.7%	1.93
Community and Social Service Occupations	43,280	11.5%	1.14
Legal Occupations	25,160	6.9%	1.24
Healthcare Practitioners and Technical Occupations	170,140	7.9%	1.09
Construction and Extraction Occupations	115,570	5.5%	1.10

Table 7: Maryland's Growing Occupations

Using occupational growth from 2014 to 2016 in combination with location quotients (LQ) greater than one, nine major group growth occupations were identified for the state of Maryland (See Table 7). Occupations within these major occupational groups, such as Information Security Analysts, Software Developers, Systems Software, Health Educators, and Social Workers, All Other have above average wages.<sup>xxiii</sup> Furthermore, detailed occupations within the major growth occupations are available across a range of education levels providing opportunities for Marylanders.

## *Emerging Occupations*

Using the occupational growth from 2014 to 2016 in combination with location quotients (LQ) less than or equal to one, eight major group growth occupations were identified for the state of Maryland (See Table 8). Occupations within these major occupational groups, such as Occupational Therapy Assistants, Physical Therapist Assistants, Air Traffic Controllers, Motorboat Operators, and Executive Secretaries and Executive Administrative Assistants have above average wages.<sup>xxiv</sup> Furthermore, detailed occupations within the major growth occupations are available across a range of education levels providing opportunities for Marylanders.

Occupation Title	2016 Employees	% Change	LQ
Healthcare Support Occupations	74,520	8.8%	0.98
Food Preparation and Serving Related Occupations	217,820	3.1%	0.89
Personal Care and Service Occupations	78,460	2.6%	0.92
Sales and Related Occupations	265,250	3.4%	0.97
Office and Administrative Support Occupations	408,340	1.2%	0.99
Farming, Fishing, and Forestry Occupations	2,620	54.1%	0.30
Installation, Maintenance, and Repair Occupations	100,590	1.5%	0.98
Transportation and Material Moving Occupations	163,600	7.7%	0.89

*Table 8: Maryland's Emerging Occupations*

(iii) Employers' Employment Needs. With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

Based on real-time Labor Market Information (LMI), Maryland identified the top ten occupations by the number of job openings advertised online through the Maryland Workforce Exchange (MWE), the State's job bank. The charts provided are based on annual data obtained from the MWE during 2016. Reviewing the real-time LMI generated by the MWE, the identified top ten occupations will be reviewed on a bi-annual basis for any changes.

Included in this listing are many of the previously mentioned occupations, such as Computer and mathematical occupations, Healthcare practitioners and technical occupations, and Management occupations.

Occupation	Job Openings	Mean (Average) Wage
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Occupation	Job Openings	Mean (Average)
Healthcare Practitioners and Technical Occupations	135,236	\$75,503
Computer and Mathematical Occupations	123,295	\$97,876
Management Occupations	111,947	\$79,372
Sales and Related Occupations	80,832	\$48,273
Office and Administrative Support Occupations	78,240	\$35,579
Architecture and Engineering Occupations	54,273	\$97,933
Transportation and Material Moving Occupations	49,712	\$36,119
Business and Financial Operations Occupations	46,222	\$69,071
Food Preparation and Serving Related Occupations	33,656	\$36,827
Installation, Maintenance, and Repair Occupations	26,877	\$46,340

Table 9: Top Advertised Job Openings by Occupations; Source: MWE, 2017

Below are the top certifications included in employers' online job postings.

Advertised Certification Group	Job Openings
Certification in Cardiopulmonary Resuscitation (CPR)	11,746
Commercial Driver's License (CDL)	7,882
Basic Life Support (BLS) Certification	7,488
Advanced Cardiac Life Support Certification (ACLS)	4,811
Certified Information Systems Security Professional (CISSP)	2,759
Pediatric Advanced Life Support (PALS)	2,168
GIAC IT Security Administration Certification	1,926
Certified Nursing Assistant (CNA)	1,798
Cisco Certified Network Associate (CCNA)	1,796
Certified Public Accountant (CPA)	1,725

Table 10: Top Advertised Job Openings by Certification Group; Source: MWE, 2017

According to the top jobs advertised online, job openings are available at a range of education and experience levels.

Occupation	Education Level	Job Openings
Computer and Mathematical Occupations	Bachelor's Degree	29,084
Management Occupations	Bachelor's Degree	15,836
Office and Administrative Support Occupations	High School Diploma or Equivalent	15,310
Architecture and Engineering Occupations	Bachelor's Degree	12,548
Sales and Related Occupations	High School Diploma or Equivalent	10,134
Business and Financial Operations Occupations	Bachelor's Degree	9,772

Occupation	Education Level	Job Openings
Healthcare Practitioners and Technical Occupations	Bachelor's Degree	7,743
Healthcare Practitioners and Technical Occupations	No Minimum Education Requirement	7,380
Management Occupations	High School Diploma or Equivalent	6,411
Transportation and Material Moving Occupations	High School Diploma or Equivalent	5,795
Healthcare Practitioners and Technical Occupations	High School Diploma or Equivalent	4,961
Installation, Maintenance, and Repair Occupations	High School Diploma or Equivalent	4,955
Healthcare Practitioners and Technical Occupations	Associates Degree	4,334
Computer and Mathematical Occupations	High School Diploma or Equivalent	4,181
Sales and Related Occupations	Bachelor's Degree	3,673
Healthcare Support Occupations	High School Diploma or Equivalent	3,537
Business and Financial Operations Occupations	High School Diploma or Equivalent	3,509
Production Occupations	High School Diploma or Equivalent	3,347
Computer and Mathematical Occupations	No Minimum Education Requirement	3,289
Food Preparation and Serving Related Occupations	High School Diploma or Equivalent	2,928
Arts, Design, Entertainment, Sports, and Media Occ	Bachelor's Degree	2,873
Protective Service Occupations	High School Diploma or Equivalent	2,669
Office and Administrative Support Occupations	Bachelor's Degree	2,609
Business and Financial Operations Occupations	No Minimum Education Requirement	2,450
Healthcare Practitioners and Technical Occupations	Master's Degree	2,303

Table 11: Top Advertised Job Openings by Education Levels; Source: MWE, 2017

Occupation	Occupation Needs
Healthcare Practitioners and Technical Occupations	Customer service skills, interpersonal skills, problem solving, Registered Nurse (RN) skills, decision making, flexibility, critical thinking, time management, occupational therapist skills, and ability to educate patients
Management Occupations	Customer service skills, managerial skills, marketing skills, operations, manufacturing, technical skills, human relations, work effectively with people, conceptual skills, interpersonal skills, oral and written communication, constructive listening, honest and direct dialogue, sensitivity, flexible and adaptable, high energy level, ability to synthesize, work ethic, initiative, business judgment, self-confidence, leadership ability, decisiveness, and problem solving ability[1]

Occupation	Occupation Needs
Computer and Mathematical Occupations	Repairing, quality control analysis, programming, troubleshooting, systems evaluation, installation, equipment selection, technology design, equipment maintenance, operation monitoring, systems analysis, operations analysis, judgment and decision making, operation and control, persuasion, instructing, service orientation, coordination, social perceptiveness, negotiation, management of material resources, management of financial resources, time management, management of personnel resources, complex problem solving, speaking, mathematics, science, writing, active learning, learning strategies, monitoring, active listening, reading comprehension, and critical thinking[2]
Sales and Related Occupations	Customer service skills, interpersonal skills, relationship management, business development skills, telemarketing skills, cold calling, time management, problem solving, ability to analyze, marketing skills, and closing skills
Office and Administrative Support Occupations	Customer service skills, problem solving, interpersonal skills, travel agent skills, time management, office clerk skills, word processing, typing, receptionist skills, answering phones, administrative assistant skills, and administrative management
Transportation and Material Moving Occupations	Customer service skills, problem solving, truck driving skills, unloading deliveries, web developer skills, application development, operate tractor-trailer, interpersonal skills, flexibility, unloading freight, and transportation management
Architecture and Engineering Occupations	Customer service skills, apply mathematical and scientific principles to building design; concentrate on structural demands, functionality, and economic and safety factors; diagram designs manually and through computer-aided drafting; communication skills; ability to work with a team; and comfortable with different work environments[3]
Food Preparation and Serving Related Occupations	Customer service skills, food preparation worker skills, cooking skills, proper food handling, ability to speak clearly, following recipes, interpersonal skills, greeting customers, flexibility, restaurant manager skills, be a team player, positive attitude
Business and Financial Operations Occupations	Customer service skills, problem solving, business development skills, interpersonal skills, time management, ability to resolve issues, risk analyst skills, risk management, project manager skills, project manager experience, contract administrator skills, web developer skills, and application development
Installation, Maintenance, and Repair Occupations	Customer service skills, maintenance technician skills, preventative maintenance, general maintenance, building maintenance, construction worker skills, caulking, interpersonal skills, be a team player, time management, and welding skills

Table 12: Occupational needs

(2) Workforce Development, Education and Training Activities Analysis. The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the state, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of—

(A) *The state's Workforce Development Activities.* Provide an analysis of the state's workforce development activities, including education and training activities of the core programs,

Combined State Plan partner programs included in this plan, and required and optional AJC delivery system partners.

Maryland has submitted a Combined State Plan that was careful to include the workforce functions of three state agencies: the DLLR, the DHS as the agency charged with administration of Maryland's Temporary Assistance for Needy Families (TANF) program, and the Maryland State Department of Education's (MSDE) Division of Rehabilitation Services (DORS) as the agency charged with administration of the state's Vocational Rehabilitation (VR) Program.

#### *DLLR – Division of Workforce Development & Adult Learning (DWDAL)*

Administration of the majority of the programs set forth in this Combined State Workforce Plan is the responsibility of the DLLR's DWDAL. The Division administers the WIOA Title I, Title II, and Wagner-Peyser Programs. The Division also administers the Trade Adjustment Assistance Act program, the JVSG Program, the Senior Community Service Employment Program (SCSEP), and Maryland Apprenticeship. The SCSEP is also administered by non-state partners, including Senior Service America, Inc. and its subgrantees.<sup>xxv</sup> The Division coordinates the efforts of Maryland's 32 AJCs, which provide comprehensive services to both jobseekers and businesses. While jobseekers are offered a wide range of career and training services, businesses are provided with numerous types of assistance and growth services. The Division's Business Solution Team and Dislocated Worker Services unit provides centralized oversight and administration of Maryland's Rapid Response and Trade Assistance Act (Trade) Program activities. DWDAL coordinates many workforce training activities, including Re-employment Services and Eligibility Assessment (RESEA), Re-employment Opportunity Workshop (ROW), Rapid response, etc. with DWDAL's Division of Unemployment Insurance (DUI), another division within DLLR. DWDAL also has a number of specialized offices focused on the diverse needs of Maryland's businesses and jobseekers.

- POAC provides assistance to individuals who are in the professional, executive, technical, managerial, and/or scientific occupations, along with recent college graduates, who find themselves in need of assistance in getting reconnected to the labor market.
- RESEA program was developed by the United States Department of Labor (USDOL) in an effort to reduce the number of weeks that UI claimants receive benefits and is designed to help claimants to identify potential barriers to employment and assesses work search progress.
- ROW program is a full-day workshop offered to certain UI claimants to shorten the duration of UI benefits received through reemployment efforts.
- Veteran services unit operates the JVSG. The JVSG program's mission is two-fold: it offers employment and training services to veterans with significant barriers to employment and connects employers with work-ready veterans.
- The Foreign Labor Certification (FLC) program is an employment-based immigration program which assists applicable employers, who have obtained USDOL approval to begin the hiring process of permanent or temporary foreign workers.
- Tax credit unit is charged with administering federal and state tax credit programs which offer income tax incentives to employers for hiring members of targeted population groups, such as ex-offenders or certain individuals with disabilities.

- The Migrant and Seasonal Farmworkers (MSFW) specialized menu of services within the Wagner-Peyser program ensures migrant and seasonal farm workers are receiving the same employment services that non-migrant seasonal farm workers receive at the state's AJCs.
- The Maryland Re-entry Initiative (MRI) is a statewide initiative to increase the employability of Maryland citizens with criminal backgrounds. The program provides technical assistance to jobseekers, staff, and employers to increase the number of individuals hired with criminal history and facing barriers to employment. The MRI administers the federal bonding program through the state's AJCs.
- Youth and disability services provides disability and youth services coordination and technical assistance to the state of Maryland's Local Areas and partners responsible for serving WIOA Title I youth program participants and AJC customers with disabilities. These services include the implementation of DLLR's Disability Employment Initiative grant to increase career pathway opportunities for individuals with disabilities.
- Business services unit exists to help companies grow and thrive, to foster economic growth and stability, and to ensure that Marylanders have opportunities for gainful employment.
- DLLRS serves as the "State Apprenticeship Agency" and, in consultation with the Maryland Apprenticeship and Training Council, is responsible for the following functions in the State: registering apprenticeship programs that meet federal and state standards; issuing certificates of completion to apprentices; encouraging the development of new programs through outreach and technical assistance; protecting the safety and welfare of apprentices; and assuring that all programs provide high-quality training.
- New Americans Initiative will provides much needed outreach and technical assistance for AJC staff concerning providing equitable and meaningful access of services to eligible immigrants and Limited English Proficiency (LEP) individuals.
- Policy unit convenes stakeholders and subject matter experts to develop policies for DWDAL, and/or jointly with other divisions or departments, to implement WIOA.
- Employment Advancement Right Now (EARN) Maryland is the State's nationally-recognized workforce program. The program is industry-led, designed to address business workforce needs by focusing on industry sector strategies that produce long-term solutions to sustained skills gaps and personnel shortages.

The Division is also home to the Office of Adult Education and Literacy Services. As the WIOA Title II provider in the state, the Office selects local providers of adult education instructional services via a statewide competition made available to eligible providers every five years. Instructional services include Adult Basic and Secondary Education, English Language Acquisition / Integrated English Literacy and Civics, Family Literacy, High School Diploma preparation, and Correctional Education. Maryland's current providers include a wide-range of community colleges, local public school systems, community-based organizations, public libraries, and the state's Correctional Education program. The Office of Correctional Education also provides educational opportunities for incarcerated men and women enabling them to become independent and productive workers, citizens, and parents. The Office, with the oversight of the Correctional Education Council and in partnership with the Department of Public Safety and Correctional Services DPSCS, is responsible for the academic and vocational educational programs provided in Maryland's correctional institutions.

### *MSDE – Division of Rehabilitation Services (DORS)*

The public VR Program in Maryland is administered by the MSDE’s DORS in accordance with the Rehabilitation Act of 1973, as amended, most recently by the WIOA of 2014. DORS is funded primarily by the United States Department of Education’s Rehabilitation Services Administration. The federal funding includes a state matching requirement (federal 78.7 percent and state match of 21.3 percent) and maintenance of effort requirement. DORS provides services and supports to assist eligible students, youth, and adults with significant disabilities transition to post-secondary education, training, and employment. DORS also engages with businesses throughout Maryland, assisting them in recruiting and maintaining qualified, valuable employees. DORS also serves as a resource on disability and employment matters such as disability awareness training, workforce diversity and inclusion initiatives, training on the Americans with Disabilities Act, solutions for reasonable accommodations, and worksite consultations. DORS continues to be dedicated to the creation of the aforementioned Maryland Business Services team.

### *DHS - Family Investment Administration (FIA)*

In Maryland, the TANF program is referred to as the Temporary Cash Assistance (TCA) Program, and is delivered at the LDSS level. LDSS Offices, a listing of which can be found at [http://www.dhr.state.md.us/blog/?page\\_id=805](http://www.dhr.state.md.us/blog/?page_id=805), is the statewide framework for delivering education, job training, job placement, and other services to assist TANF customers with overcoming barriers to obtaining self-sustaining employment. In Maryland, efforts led to record TANF job placements in each year of the Fiscal Year 12-2014 period. Key components of the program include:

- Collaborating with private and public sector partners to identify local growth occupations and their associated education and training requirements;
- Assessing a customer’s respective skill sets, career interests, and barriers to obtaining self-sustaining employment; and
- Developing or procuring appropriate work-related services, including academic remediation, targeted sector training, and job placement services.

TANF workforce development is built on a philosophy of “universal engagement.” This means that customers are expected to participate in activities based on the results of individual assessments with the goal of employment or removing barriers to employment. Many of the remaining welfare families, in addition to many of the new families applying for TCA can be considered “hard to place” into jobs. Workforce development is designed to meet the critical, essential needs of the underemployed, newly unemployed, and hard-to-place. In addition to workforce development, the TANF program provides a broad range of services. The Department’s FIA formed partnerships with other administrations within DHS, including the Child Support Enforcement, Social Services divisions, other state agencies, and community organizations. FIA works with these partners to promote DHS’s goal to protect children by assisting their families to become independent through work, personal, and family responsibility as well as community involvement. The Department expanded its goal to include support for

low-income working families and continues to strengthen those partnerships by empowering staff in the LDSS across the state to work together to provide employment and training activities, supportive services, and benefits that enable customers to obtain jobs and improve their economic circumstances.

#### *DLLR-Division of Unemployment Insurance*

Maryland's Unemployment Insurance program is administered by DLLR's Division of Unemployment Insurance (DUI). The program pays benefits to workers who have lost their job through no fault of their own and meet the program's eligibility requirements. Individuals wishing to file a claim may do so online or via DUI's Claim Center phone line. Maryland's AJC staff are also trained to assist customers in filing claims. To help customers to benefit from the wide range of job seeker services available to them through the AJCs and WIOA partners, AJC staff provide presentations to ROW and RESEA participants.

#### *Local and State Workforce Development Boards*

The Governor's Workforce Development Board (GWDB) is the Governor's chief policymaking body for workforce development. The GWDB is a business-led board of 53 members, a majority of whom represent the business community, as mandated by WIOA. Specifically, 37 members represent business, 11 represent workforce, and 15 represent government. Members include the Governor and the Lieutenant Governor, cabinet secretaries, college presidents, the state Superintendent of Schools, elected officials, labor, and representatives of non-profit organizations. The Maryland Workforce Association (MWA) is a coalition of executive directors from Maryland's 12 local workforce agencies. MWA works closely with GWDB and DLLR to support a comprehensive workforce system. WIN, GWDB, and DLLR meet monthly to discuss important matters pertaining to the workforce system and to provide perspective on issues that may arise. The collaboration between WIN, GWDB, and DLLR creates a strong workforce system in Maryland. Local Boards are established in each of these 12 Local Areas to ensure that each area's workforce is well-prepared to meet the current and future needs of local businesses.

#### *SCSEP*

Maryland's SCSEP services are designed to assist older workers to develop workplace skills which will enable them to attain permanent, unsubsidized employment, either with their host agencies or other non-profits, government or private sector employers. Participants are trained by a variety of employers including schools, physicians, health care agencies, hospitals, custodial and maintenance service industries, senior service providers, administrative and management entities, retail merchants, and transportation, security and technology companies. The services of the SCSEP program are available to job seekers, ages 55 and older, who are unemployed, meet established low-income guidelines and desire an opportunity for training and employment. Program participants are given a training assignment that most closely matches their personal goals for employment. Training assignments are coordinated with non-profit or government agencies, also known as host agencies, and are limited to 20 hours per week, at the established minimum wage hourly rate. Applicants are not required to have previous work experience.

### *Seedco and Bon Secours*

Structured Employment and Economic Development Corporation (Seedco), along with Bon Secours Community Works, is the Maryland Re-Integration of Ex-Offenders (RExO) partner through the Section 212 grant. Through the RExO grant, Seedco established the West Baltimore Career Pathways Collaborative to: (1) prepare participants for career pathways in local demand sectors by providing access to training, education, job placement, and career development services; (2) address basic needs and life issues that are barriers for success; and (3) place participants in long-term, well-paying jobs. The West Baltimore Career Pathways Collaborative is conducting this training-to-work adult re-entry project in Baltimore City and West Baltimore within Baltimore County. Seedco/Bon Secours is focused on the in-demand industry sectors and career pathways of: (1) Healthcare/Social Assistance, (2) Transportation/Warehousing/Logistics, (3) Manufacturing/Advanced Manufacturing, and (4) Construction.

(B) *The Strengths and Weaknesses of Workforce Development Activities.* Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

As noted above, the state provides a wide-range of services to Maryland's jobseeker and businesses. However, in order to efficiently provide an analysis of the strengths and weaknesses of Maryland's workforce system, one must first look at it as a system. As the state begins to implement the provisions of the federal Act, it is clear that Maryland's jobseekers and businesses require a systems approach to the delivery of services. For this reason, the Maryland workforce system will work together to implement the *Benchmarks of Success*. The Benchmarks reflect a shared vision of excellence among the State's workforce system partners and provide a strategic tool for continuous improvement. As Maryland seeks to strengthen and enhance its workforce system through implementation of WIOA, success requires a commitment to innovation, collaboration, and readiness to take a true systems approach.

In order to guide the WIOA partners in this work, the *Benchmarks* set forth a clear vision, goals, and measurable achievements that will help gauge success, as the WIOA partners work to lay the foundation of this new system. In keeping with Maryland's commitment to place "people before performance," strategic goals and corresponding benchmarks are focused around a central vision of increasing the earning capacity of Marylanders by maximizing their access to employment, skills and credentialing, life management skills, and supportive services.

The goals and benchmarks are more than mere measures; they provide a way of thinking systematically about how Maryland delivers services. They reflect the state's dedication to focusing its efforts on the people who need the system's assistance the most. The five strategic goals and related benchmarks intentionally set a high bar. The *Benchmarks of Success* are meant to be used as a leadership tool to guide strategic conversations; to define achievements for the workforce system; and to commit to strive forward in collective work, to improve the lives of Marylanders.

In implementing the Benchmarks, Maryland has re-purposed its WIOA workgroups into the following:

1. **Executive Steering Committee**- including the leadership from the core WIOA partner agencies, responsible for providing strategic oversight and direction to the Benchmarks initiative, and governing the WIOA Alignment Group;
2. **WIOA Alignment Workgroup**- responsible for ensuring the strategic vision of the Executive Steering Committee is realized by providing operational guidance to the other Benchmark committees;
3. **Data and Dashboard**- responsible for developing a consistent, sustainable system all workforce partners can use to measure, analyze, display, and apply Benchmarks data to continuously improve the quality and effectiveness of services;
4. **Professional Development and Technical Assistance**- responsible for producing, disseminating, and facilitating professional development and technical assistance programming that supports Maryland's WIOA partners in what the Benchmarks are and how they can be used to drive continuous improvement; additionally, this committee will conduct a stakeholder analysis;
5. **Policy**- responsible for identifying opportunities to support the implementation of the Benchmarks via policy change; and
6. **Communications**- responsible for developing a plan that identifies stakeholders, effective communication methods, and maps out the implementation of the Benchmarks. This committee facilitates and maintains the internal communication between the committees as well as external communication about the Benchmarks.

These committees will feed back into each other for continuous collaboration and improvement of services, data, and vision.

*(C) State Workforce Development Capacity.* Provide an analysis of the capacity of state entities to provide the workforce development activities identified in (A), above.

Maryland's WIOA State Plan is Governor Hogan's blueprint for the creation of an effective and efficient workforce system. Governor Hogan has directed the DLLR, the DHS, and the MSDE to work collaboratively to develop a strategic and operational plan to include the following programs:

WIOA State Plan Program	Core WIOA Program as determined by law	Additional WIOA Program as determined by Governor	MD state Agency Responsible for Oversight
Adult Program			DLLR
Dislocated Workforce Program			DLLR
Youth Program			DLLR
Wagner-Peyser Act Program			DLLR
Adult Education and Family Literacy Act Program			DLLR
VR Program			MSDE
TANF Program			DHS
Trade Adjustment Assistance for Workers Program			DLLR
Jobs for Veterans State Grant (JVSG) Program			DLLR
Unemployment Insurance**			DLLR

<b>WIOA State Plan Program</b>	<b>Core WIOA Program as determined by law</b>	<b>Additional WIOA Program as determined by Governor</b>	<b>MD state Agency Responsible for Oversight</b>
SCSEP**			DLLR and Senior Service America, Inc
RExO			Seedco and Bon Secours
<i>** = New addition to Maryland Combined State Plan effective 2018-2020</i>			

*Table 13: Partners for WIOA State Plan*

The inclusion of these key programs, in combination, will ensure that Maryland effectively leverages its existing resources to deliver outstanding customer service to workers and businesses that are vital to Maryland's economic growth and prosperity. Key partners from these state agencies and other recipients of federal funding, as well as representatives from the GWDB and Local Areas (collectively referred to as the "WIOA partners"), pursuant to the Governor's charge, work together to ensure that Maryland is poised to develop a workforce system that strives beyond WIOA to collaboratively meet the needs of state customers.

#### *Overview of Maryland's WIOA Transition*

The Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014, and went into effect July 1, 2015. WIOA supersedes the Workforce Investment Act (WIA) of 1998, and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973. WIOA is designed to help both jobseekers and businesses. WIOA addresses the needs of jobseekers through establishing a workforce system that helps them access, education, training, and support services to gain employment and succeed in the labor market. WIOA addresses employer needs by matching them to the skilled workers they need to compete in the global economy.

In order to ensure Maryland's effective implementation of the requirements of the new federal law, the WIOA partners agreed on the development and implementation of proven best practices and strategies towards system improvement.

- (b) State Strategic Vision and Goals.** The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—  
(1) Vision. Describe the State's strategic vision for its workforce development system.

#### *Changing Maryland for the Better*

Governor Hogan's vision for Maryland centers on five main principles:

- (1) Economic Development and Jobs;
- (2) Reduce Taxes and Fees;

- (3) Fiscal Responsibility;
- (4) Government Reform; and,
- (5) Improving Quality of Life.

Providing businesses with the skilled workforce they need to compete in the global, regional, and local economies is central to Governor Hogan’s vision and to his charge to ensure that Maryland is “open for business.” Maryland’s workforce system provides that talent pipeline through a partnership of State and local partners, businesses, economic development, education, and community stakeholders.

In October 2015, to ensure that the workforce system efficiently and effectively meets the needs of both the businesses and the jobseekers that it serves, Governor Hogan directed Maryland’s workforce agencies to jointly develop the State’s workforce plan. This marked the first time that Maryland’s DLLR, the DHS (then the DHR), the MSDE, the GWDB, and local workforce partners joined together to develop the operational components of Maryland’s plan in a truly collaborative way. At the time, the Governor’s charge to these agencies was to develop a plan that maximizes state resources to deliver outstanding customer service to workers and businesses that are vital to Maryland’s economic growth and prosperity. The agencies were further encouraged to collaborate and innovate to ensure that Maryland’s citizens have access to quality workforce training and employment opportunities.

In response to the Governor’s charge, the Departments, in conjunction with their local partners, developed a more collaborative approach to operations that has led to the formation of Maryland’s workforce system. This approach acknowledges that no one agencies or entity can deliver all the services needed for customers of the system. It also recognizes that investments must be made to provide innovative services that go above and beyond the bare requirements of WIOA. To that end, the State Plan established the WIOA Alignment Group. Subsequently, the WIOA Partners have developed and are now beginning to implement the *Benchmarks of Success for Maryland’s workforce system*. Both the Alignment Group and the Benchmarks embody the Governor’s vision of a customer-centered workforce system that holistically delivers services to meet the customer where they are, rather than fit the customer into a predetermined funding stream.

Established in 2015, the WIOA Alignment Group is a leadership group whose mission is to ensure the effective, collaborative implementation of the Maryland WIOA State Plan. The Alignment Group is dedicated to facilitating open lines of communications between partners and exploring ways to implement the requirements of WIOA and this State Plan. The group, which meets monthly, is comprised of 12-16 State and local leaders who represent each of Maryland’s key WIOA partner organizations. The leaders have programmatic decision-making authority to execute proposals and projects. The Alignment Group also oversees the functioning of workgroups established to implement the State Plan and/or the Benchmarks.

As Maryland seeks to strengthen and enhance its workforce system through the implementation of this State Plan, success requires a commitment to innovation, collaboration, and a true systems approach among the State’s many workforce partners. In order to guide the WIOA Partners in this work, the GWDB worked with the WIOA Alignment Group and other key stakeholders to

set forth a clear vision, goals, and measurable achievements to help define success and lay the core foundation of the State’s workforce system.

In keeping with Maryland’s commitment to “place people before performance” and Governor Hogan’s principles of economic development and jobs, government reform and improving the quality of life for Marylanders, the *Benchmarks of Success* goals and corresponding benchmarks are focused around a central vision of increasing the earning capacity of Marylanders by maximizing access to employment, skills and credentialing, life management skills, and supportive services.

To meet this vision, Maryland’s workforce system has commitment to work across agencies together towards five key goals:

1. Increase the earning capacity of Maryland’s workforce system customers by maximizing access to employment;
2. Increase the earning capacity of Maryland’s workforce system customers by maximizing access to and use of skills and credentialing;
3. Increase the earning capacity of Maryland’s workforce system customers by maximizing access to and use of life management skills;
4. Increase the earning capacity of Maryland’s workforce system customers by eliminating barriers to employment; and,
5. Strengthen and enhance the effectiveness and efficiency of Maryland’s workforce system.

To measure progress towards these goals, Maryland has developed a series of benchmarks that it plans to use to measure success. Once tracked, the coinciding benchmarks will intentionally set a high bar for the system—one that goes beyond the statutorily required indicators of performance. The measurement results will be used as a leadership tool, guiding strategic conversations and defining a set of achievements for the workforce system to commit to and strive toward in the collective work to improve the lives of Marylanders.

The *Benchmarks of Success* are not mere measures, but rather a way of thinking systematically about how the WIOA partners deliver services. They reflect Maryland’s commitment to serving customers who need the system’s support the most. By strategically focusing all of Maryland’s workforce system partners around the shared *Benchmarks of Success* vision and goals, the State will be well-poised to support jobseekers in receiving holistic support. In turn, this will create a more prepared, responsive workforce for Maryland’s businesses.

The *Benchmarks* will also drive the addition of partners committed to holistically supporting Maryland’s businesses and jobseekers. Since the creation of the State Plan, the State has been actively searching for opportunities to expand the scope and breadth of the workforce system. Additional governmental entities such as the Senior Community Service Employment Program (SCSEP), Unemployment Insurance, and the Community Services Block Grant and non-governmental entities such libraries and community health workers will bring different and important voices to the conversation. It also allows the workforce system to meet the multifaceted needs those entering the State’s AJCs. While great strides have been taken since the initial creation of the State Plan, the State’s implementation has not veered from developing a

system that places “people before performance.” Governor Hogan’s principles continue to serve as the solid foundation for this systems change.

### *Economic Development and Jobs*

*“Our focus will be on jobs, struggling Maryland families, and restoring our economy.”* -Governor Hogan’s 2015 State of the State Address

Maryland thrives as the economy flourishes. As businesses grow, jobs are created. As jobs are created, qualified workers are needed to meet the demand. As workers become more highly skilled, innovations occur resulting in the emergence of new economic drivers. A sound and thriving economy creates quality careers, provides financial stability for Maryland’s families and communities, and reduces dependency on government programs. In short, business must play a key role in Maryland’s workforce system.

Workforce initiatives must be driven by industry. A workforce system that is disconnected from business fails to meet the needs of jobseekers who do not obtain the training needed to obtain gainful employment. Previously, business’ input into the workforce development system was largely based on its role as “employer.” While providing employment is a very important role that a business plays, businesses must also focus on successfully providing a product or service. Therefore, Maryland’s workforce system must strive to produce the workforce needed for businesses to be successful.

Businesses serve as partners to the workforce system by providing input regarding in-demand training needs, and policy guidance for the system to ensure that initiatives are driven by industry demands. As businesses change and adapt to labor markets, a workforce development system that successfully partners with business must also evolve to ensure that jobseekers receive proper training and opportunities for in-demand careers.

The GWDB, comprised of business leaders in targeted industry sectors, has convened a number of task force groups around industry needs. Board members generally serve as ambassadors for Maryland’s business community and further advise Governor Hogan and the workforce system on workforce development and training needs for Maryland’s businesses. However, the GWDB is only one entity in the system. All of Maryland’s workforce partners must proactively engage with businesses to ensure that workforce training funds are utilized in the most effective and efficient way possible.

Since the State Plan was first established in 2016, the workforce system has been able to create and expand industry-driven solutions to workforce needs. The workforce system has been invested in growing Registered Apprenticeship (RA) opportunities, and has successfully piloted youth apprenticeship opportunities for youth. Through key state and federal investments in apprenticeship, Maryland is quickly becoming a leader in apprenticeship innovation. RA is an employer-driven workforce solution that should be for all Marylanders. The Maryland Department of Education’s DORS has been key in exploring ways apprenticeship, both pre- and RAs, can serve as a life-changing opportunity for those with disabilities.

Maryland has also been recognized as a national leader in industry-led partnerships through the EARN Maryland program. The program, whose acronym stands for Employment Advancement

Right Now, is a state-funded initiative that provides training opportunities for Maryland's jobseekers and those individuals seeking to obtain additional training to further their careers in a wide variety of fields. Partnerships have been formed to advance careers in health care, construction, biotechnology, cybersecurity and information technology, transportation and logistics, and many more. While there is wide variety in the partnerships funded through a DLLR competitive grant process, all partnerships are driven by industry needs and have a number of business partners involved in shaping each individual program. To date, over 800 employer partners are participating in the EARN Maryland program. Harnessing the effectiveness of the program for the State's employer partners, Governor Hogan doubled the EARN Maryland budget for FY 2017 and continues investing in the EARN Maryland program by directing funding for the establishment of EARN strategic industry partnerships in green energy and cybersecurity/information technology jobs.

While these programs continue to make a marked difference for participating businesses, Maryland's WIOA Partners must continue to proactively work as a team to meet workforce challenges conveyed by the business. As noted above, no one agency or partner can provide all the services customers need. The same holds true for services to business. Maryland's WIOA Partners must work together to ensure quality customer service to the business. Previously, Maryland's business outreach has been disjointed as agencies independently built relationships with businesses without collaboration or coordination. As a result, multiple agencies from State and local entities make multiple, and sometimes overlapping inquiries of business. Rather than building lasting relationships with this consumer of workforce services, businesses are often pulled away from their businesses to meet with government agencies. Thus, Maryland's workforce and economic agencies must coordinate efforts to provide consulting services in order to service business needs.

Since the formation of the State Plan, Maryland has continued to examine how it can find ways to collaborate to serve its common business customers. In the upcoming months, the WIOA Partners will continue to work on strategic plans, tools, and training to ensure greater communication and knowledge of each partner's programs. Business Services training will be conducted on a coordinated basis and Local Areas will be tasked with developing standard operating procedures on how local business service teams comprised of local partners will address business services. These procedures will be developed and ultimately included in local plans.

In short, these tools and approaches are targeted to develop a deeper understanding of the services each WIOA Partner offers, and, after understanding a business's needs, will be able to refer the business to the services of the appropriate agency. This will require that the agencies collaborate on a shared communications platform. In short, the State's workforce agencies must be proactively engaged with Maryland's business community. It cannot wait for business to come to the State for assistance. Through relationship-building, the State's workforce system must be attuned to the needs of Maryland's businesses, and must tailor workforce training opportunities to ensure that those needs are being met.

*“Marylanders are among the nation’s hardest working and most educated people.”* -Governor Hogan’s 2015 State of the State Address

The State of Maryland is geographically diverse. From the mountains of Western Maryland, to the Interstate 95 corridor, to the waters of the Chesapeake Bay, Maryland is truly “America in miniature.” The people who call Maryland home are just as diverse. They come from a large array of backgrounds, education, and social and political perspectives. They carry with them unique life stories and experiences that can contribute greatly to Maryland’s economic well-being.

A jobseeker from Cumberland may face different barriers to employment than the same jobseeker in Tacoma Park faces. The State’s workforce system must be responsive to the needs of both jobseekers. Thus, collaboration on both the State and local levels is key to ensuring that customers who enter any AJC, local social services office, or any other entry point into the Maryland workforce system is provided with specific, customized services.

In the end, the primary goal of the workforce system must be to serve the person above serving only performance measures. This is not to say that performance measures are not important. However, when the workforce system focuses on the needs of fellow Marylanders, and not just the prescribed goals of a particular program, performance will naturally increase. In serving fellow Marylanders, the State’s workforce system will not only change the lives of those jobseekers it serves, but it will also affect the lives of that individual’s family and that their community. By placing people before performance, the State workforce system will truly be changing Maryland for the better.

This change in philosophy will not occur overnight. Maryland’s WIOA Partners must ensure that message of placing people before performance is captured throughout the workforce system and not merely an empty platitude written on the pages of a lengthy State plan. As the workforce system dedicates its efforts to ensuring that all of Maryland’s jobseekers are provided quality services, particular focus must be placed on those individuals who face barriers to employment that hinder them from entering into a fulfilling and meaningful career. Individuals with barriers to employment, as defined by the WIOA and Maryland include the following:

- Displaced homemakers
- Eligible migrant and seasonal farm workers
- Ex-offenders
- Homeless individuals
- Individuals facing substantial cultural barriers
- Individuals with disabilities, including youth with disabilities
- Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act
- Individuals who are English language learners
- Individuals who are unemployed, including the long-term unemployed
- Individuals who have low levels of literacy
- Individuals without a high school diploma
- Low income individuals, including TANF and SNAP recipients

- Long-term unemployed individuals
- Native Americans, Alaskan Natives, and Native Hawaiians
- Older individuals
- Single parents (including single pregnant women and non-custodial parents)
- Veterans
- Youth who are in, or have aged out of, the foster care system

Those with barriers to employment, as described above, deserve the attention of the workforce system. Along with these barriers comes a multitude of stigmas, myths, and fallacies. Low expectations and misconceptions abound when dealing with those with disabilities, those who are ex-offenders, and those with low levels of literacy or who are otherwise without a high school diploma. In creating a customer-centric system that is dedicated to providing services to those who were previously deemed “the hardest to serve,” Maryland’s workforce system will be dedicated to eliminating the stigmas, myths, and misconceptions that exists.

One way to “bust” misconceptions is through the creation of a workforce system fosters the creation of a career pathway for all Marylanders. WIOA defines a career pathway, as a combination of rigorous and high-quality education, training, and other services that:

- Aligns with the skill needs of industries in the economy of the State or regional economy involved;
- Prepares an individual to be successful in any of a full range of secondary or post-secondary education options, including apprenticeships;
- Includes counseling to support an individual in achieving the individual’s education and career goals;
- Includes, as appropriate, education offered concurrently with, and in the same context as, workforce preparation activities and training for a specific occupation or occupational cluster;
- Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
- Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized post-secondary credential; and,
- Helps an individual enter or advance within a specific occupation or occupational cluster.

A career pathway system ensures that Maryland’s jobseekers are offered education and skills training along with the necessary credentials to meet industry demands. Recognizing the varying backgrounds of Maryland’s jobseekers, a career pathway system provides participants with multiple entry points to accommodate varying education levels, and multiple exit points as the jobseeker obtains the necessary skill or credential.

To accomplish this, Maryland’s WIOA Partners must dedicate their efforts to serve the person and not the performance measure. Maryland took the important first step in dedication to this vision through its interagency collaboration on the Combined Workforce State Plan. At the time the plan was formed, the State was one of fourteen (14) states that included TANF programs into the State’s Plan.

However, the State continues to make strides in collaboratively changing the workforce system to be more responsive to the needs of its customers. The State, utilizing the Governor's Title I Set-aside funds, initiated a competitive demonstration grant for Local Areas to create career pathways initiatives tailored to their Local Area's needs. The \$1 million grant will also strengthen the relationship between WIOA Title I providers and adult education (Title II) entities. Interventions will be honed and best practices will be shared. To that end, the State partnered with the Annie E. Casey Foundation to provide Local Areas with a survey of national best practices to spur innovation.

The *Benchmarks for Success* also serve as a way for Maryland's workforce system to refocus on the needs of the customer. The *Benchmark*'s bold vision will require the WIOA Partners to systematically develop relationships that have not yet been created. The Benchmarks call for the system to track measures on mental and physical health and substance abuse. It further tracks how the system is providing services to non-custodial parents. These partnerships must still be formed. Again, a system dedicated to placing "people before performance" must do the hard thing.

### *Opportunities for Youth*

Maryland recognizes that youth must truly be ready to enter into the workforce and academically prepared to enter into college. The State continues to invest in partnerships with Career Technology Education (CTE) programs for high school students. CTE programs include a work-based learning opportunity (e.g. internships, clinical experiences, or industry-mentored projects) tied to the student's area of interest.

The DLLR, in partnership with the MSDE, piloted a program in 2015 to establish a youth apprenticeship in science, technology, engineering, mathematics or manufacturing in two Maryland counties, Frederick and Washington. The pilot program is part of a larger initiative to foster youth apprenticeships in the State for both traditional and non-traditional apprenticeable fields. Providing opportunities for Maryland's youth that contextualize classroom training into the workplace must remain a priority for the workforce system in its delivery of services to youth in-school and out-of-school, alike.

Additionally, due to the new WIOA focus on older, out-of-school youth, as well as including TANF as a mandated partner, Maryland views this as a prime opportunity to engage younger TANF recipients between the ages of 18-24 in local WIOA youth services. This earlier engagement in workforce development for young TANF recipients can place individuals on a career pathway that will lead to self-sufficiency and earlier independence from public assistance. To that end, Maryland's WIOA Partners must examine innovations for youth and families. Since the creation of the State Plan, Maryland is investing in a Two- Generation (2Gen) framework to simultaneously provide services to youth and their parents. Leveraging relationships with Ascend at the Aspen Institute, the State is looking at this intergenerational model to end systemic poverty. Governor Hogan, through executive order, established in 2017 the Two-Generation Family Economic Security Commission. This Commission, chaired by Lt. Governor Boyd

Rutherford, continues to examine how state agencies can leverage their resources to incorporate this framework into their service models.

As the Commission's interim report notes, the State administers a number of federally mandated programs that have existed in silos. As a result, individuals who qualify for TCA, workforce training under the federal WIOA, FSP, energy assistance, adult literacy services, housing subsidies, and other government benefits and subsidies are forced to travel from agency to agency. While at those agencies, customers must complete necessary paperwork in order to determine whether they are eligible for services. The process to gather this information may take, in some instances, hours. Additionally, the customer may be required to provide the same information to multiple agencies. Simultaneously, other state agencies provide programs and opportunities for youth.

Early childhood education through programs such as Head Start and youth employment opportunities for those with disabilities through the Maryland PROMISE provide youth with critical cognitive, behavioral and vocational skills. Linking policies, systems, and programs together to simultaneously serve parents and children is the heart of the 2Gen approach. This model is not another government program. It is not an approach that is owned by one particular agency, nor can it be. Rather, Maryland's agencies must together place the family at the center of the way that it delivers services. In doing so, the short term interventions currently being used to support the family become coordinated efforts that support a family's path to self-sufficiency.

It is incumbent on the WIOA Partners to harness innovation, like 2Gen, in serving Maryland's youth and families.

### *Opportunities for Adult Learners*

Adult Education are a vital element to Maryland's workforce system. Providing academic instruction and high school equivalency testing to adult learners provides these individuals with the skills they need to compete in global, regional, state, and local economies. Effectively assessing the needs of the adult learner is key to ensuring that the individual receives the time and attention he or she needs to not only secure a job, but to secure a career, and thrive in his or her community and family. Maryland's workforce system must ensure that front-line staff is properly trained to ensure that, when an adult is assessed, it is done according to all applicable testing standards. By accurately measuring a learner's literacy, numeracy, and English language skills, Maryland's WIOA system is better equipped to meet the learner or jobseeker exactly where they are in their education or training needs, and ultimately assist the individual in obtaining gainful employment. Maryland's adult learners not only have a variety of skill levels, but also have a number of cultural obstacles that must be addressed. Ninety percent of adult education enrolled participants are below a high school level of skills.

Additionally, English language learners represent a large subset, approximately 49 percent, of the adult education population. Immigrant populations make up approximately 17 percent of Maryland's workforce system. They provide substantial contributions to Maryland's economy every day. In turn, Maryland's workforce system must strive to tailor services for this population as they obtain literacy and high school equivalency, training, and employment services. To that end, the WIOA Partners, since the initial establishment of the Workforce Plan has established the

Skilled Immigrant Task Force. This Task Force creates a forum for WIOA Partners and immigrant serving communities to find ways to more holistically provide services to Maryland's skilled immigrant population.

### *Opportunities for Ex-Offenders*

Efforts must continue to provide services for individuals in Maryland's correctional facilities. While Maryland's workforce system currently provides both academic and occupational training for this subset of the adult learner population, efforts within the correctional education system must not simply be "out of sight, out of mind."

Providing career opportunities for those who are currently incarcerated is key to reducing recidivism. It provides an investment in Maryland's communities, as those who return to their communities with a nationally recognized credential or skill are more likely to succeed. Correctional education opportunities must be tailored to the labor market, so that inmates receive training in the skills they need to successfully transition into the workforce. Greater collaboration must also occur between State agencies to identify those individuals who are slated to be released to ensure they receive job service counseling and the opportunity to obtain a marketable skill.

This population needs ongoing support to address necessary changes in mindset and realistic expectations, especially for those individuals who are not incarcerated long term. Creating and increasing efforts to assist those who have returned to society from confinement invests in individuals as they overcome the most significant barriers to employment. There is a great need to eliminate stigma against people with criminal records by providing a network of support.

While there are multiple worthwhile programs that have previously been implemented that specifically target and address the needs of this group of jobseekers, a more collaborative approach is needed under the WIOA system. For example, the Maryland DLLR, through the administration of the State's AJC system, has a number of programs which include: participation in a federal program that provides bonding and tax credits for employers who hire ex-offenders; the utilization of staff specifically trained in ex-offender employment; and, the establishment of workshops aimed at opportunities for record expungement.

Since the creation of the Plan, the State will contractually employ navigators, beginning in 2018, in targeted areas to provide services for returning citizens. This effort will more effectively and efficiently address the needs of this population by providing a link from Correctional Education programs to the AJC and to businesses.

One successful partnership that has already been formed has been between the Department's Office of Correctional Education partners with organizations such as Vehicles for Change to provide opportunities for those returning to society. Individuals who successfully complete an auto mechanics program administered through the Department while behind the fence are not only provided an opportunity to obtain Automotive Service Excellence certification, but may continue their training upon release at Vehicles for Change. Additional training sets the returning citizen on the path toward employment. The organization, recognizing that transportation is often

a significant barrier to employment, also provides individuals with the independence associated with owning their own vehicle. Maryland commits to exploring additional avenues to provide opportunities like these to this important population.

#### *Opportunities for Veterans*

Maryland's workforce system must also ensure that opportunities for veterans are plentiful and robust. Veterans make incredible and lasting impacts on their places of employment, their communities, and their families. Maryland's workforce system must be seen as a partner for veterans transitioning from active service to civilian life, no matter when that transition occurred. Currently, Veterans staff is available at every AJC to exclusively serve the needs of veteran jobseekers with significant barriers to employment, and businesses who seek to employ veterans. Maryland's workforce system must provide greater outreach to this community, and to ensure that, Veterans employment staff at both the State and local levels must be invested in this population. Professional development for staff must continuously take place on a regular basis. Furthermore, Veterans staff must be continuously aware of businesses who wish to hire Maryland's veterans. Thus, greater collaboration between business services personnel and veterans representatives must occur.

Since the formation of the Plan, the State received a National Dislocated Worker Grant targeted to Maryland's veteran population. The grant, administered by the Anne Arundel Workforce Corporation, will connect veterans to workforce services in a more meaningful way.

#### *Opportunities for Individuals with Disabilities*

Every working age Marylander with a disability, including those with significant disabilities, must have access to opportunities that lead to employment in competitive, integrated settings. The opportunity to learn necessary skills and receive needed support through the State's workforce system and its key partners enables individuals with disabilities to experience success in the full cross section of Maryland's businesses and industries. Employment is critical to ensuring quality lives for Marylanders with disabilities while reducing reliance on public assistance and strengthening the economic fabric of the State.

Marylanders with disabilities possess the ability to contribute to the state's economic growth and achieve financial self-sufficiency. Historically, however, this population has had a low level of workforce participation, particularly those with the most significant disabilities. In an effort to capitalize on the attributes of this untapped workforce, Maryland's workforce system will play a key role in embracing nationally recognized best practices including Employment First, a national effort to assure that all individuals with significant disabilities can work in meaningful positions in integrated settings when provided with adequate, appropriate support. All aspects of the workforce system, including state partner agencies, local public and private partners, and businesses will coordinate to effectively strengthen employment outcomes for Marylanders with disabilities.

To that end, the Maryland Department of Disabilities, a member of the GWDB, will provide leadership to the workforce system and other key partners. This leadership will focus on aligning

policies and service delivery practices that will ensure progress toward competitive, integrated employment as the top priority for publicly funded services supporting youth and adults with disabilities. The WIOA Partners must also collaborate to offer cross-training for staff on disability awareness. Employment opportunities for individuals with disabilities should further be accentuated at recruitment events and job fairs. In short, there is much to do to ensure that individuals with disabilities can effectively access the workforce system.

### *Reduce Taxes and Fees*

*“High taxes, over-regulation, and an anti-business attitude are clearly the cause of our economic problems.”* -Governor Hogan’s 2015 State of the State Address

High taxes stifle economic growth and a business’ desire to expand its operations within the State. UI in Maryland is one of the many taxes and fees businesses are required to pay under Maryland law. Maryland’s businesses continue to see a significant reduction in UI rates, which will be the lowest possible rates allowed under State law. While a decrease in the UI tax rate is a sign of the Administration’s continued commitment to improve the State’s business climate, there is much more to be done.

Maryland’s workforce system must partner with its UI counterparts to ensure that reemployment strategies are fully integrated and proactively implemented for both the benefit of the UI claimants and Maryland’s businesses. UI claimants benefit from reduced unemployment duration, increased reemployment and likely increased earnings. Businesses benefit by even lower UI taxes and a robust pool of candidates ready to work to meet the workforce needs of business and industry.

Increased cooperation and communication between Maryland’s workforce and UI systems will ensure that once an individual is eligible for UI benefits, he or she will quickly and efficiently be placed on the path toward meaningful reemployment. Increased cooperation and communication will also ensure that Maryland’s UI claimants have a clear understanding of the responsibilities required of them as a condition for receiving UI benefits.

Since the initial formulation of the State Plan, Maryland has included UI as a WIOA Partner. As the State’s focuses more on reemployment, this connection will benefit both jobseekers and businesses. Additionally, the State, utilizing federal funds, implemented a module with the MWE geared toward the reemployment of claimants. The REX Module, launched in 2017, will allow the claimant to more easily search for jobs and input work searches from the MWE into the UI system.

### *Fiscal Responsibility*

Maryland’s workforce system must be effective and efficient. If the focus is truly on the people and businesses that are served through the system, Maryland’s workforce partners will naturally seek to create, coordinate, and revise systems to ensure greater delivery of services. Maryland’s

WIOA Partners must continuously coordinate efforts, finding efficiencies not only within their own agencies, but also finding ways in which they can coordinate efforts with their sister agencies.

One way this may be accomplished is through the sharing of data and technological resources. Maryland's workforce agencies have varying systems that, as of March 2015, simply do not communicate with each other to the extent needed. As a result, a customer obtaining services through DLLR must provide the same basic demographic information all over again when obtaining human services, like TANF. This lack of coordination leads to duplicative efforts and frustrated customers.

#### *Government Reform*

*"Our administration will chart a new course; one guided by simple, common sense principles."*

- Governor Hogan's 2015 State of the State Address

While the path toward government reform is not an easy one, it is nonetheless a necessary journey Maryland's workforce system must take. Maryland's WIOA Partners must be innovative. They must find new ways in which they can provide services to Maryland's businesses and jobseekers. Just because something was previously done a certain way does not mean that it must continue to be done that way.

For the first time, Maryland is combining its workforce efforts across multiple agencies into one State plan. The end result will be a greater dedication by Maryland's workforce agencies to deliver services to Maryland's jobseekers from diverse backgrounds, with diverse needs. By committing to serve low-income individuals receiving services through the Maryland Department of Human Resource's TANF program, as well as those with disabilities receiving services from the MSDE's DORS, and to Maryland's adult education population, the workforce system is devoted to serving all of Maryland's jobseekers.

The renewed focus on serving these deserving populations requires a change in philosophy. Maryland's workforce system can no longer place a label on a jobseeker as merely a customer of one single agency. Rather, under this new customer-centric workforce system, the agencies together, with their respective local partners, will identify the services that are needed for the customer. This will be done not by shuffling the customer from one referring agency to another, but through collaboration and increased communication. In doing so, the system focuses on the person before the performance measures an agency reports to federal agencies.

When the focus is on meeting the customer's needs, the workforce system's efforts will be on meeting the needs of the individual, not on meeting the goals written on a page. Maryland's workforce system will recognize that jobseekers are not an input into a system that must be moved through prescribed processes. Rather, the jobseekers who enter Maryland's AJCs, or visit Local Department of Social Services (LDSS) locations are neighbors, friends, and fellow Marylanders who are in need of the critical services these agencies, and their local partners, deliver. This change is what Maryland's jobseekers and businesses not only deserve, but require. This shift in focus also requires a change in the way that Maryland measures its performance. As Maryland has treated the enactment of the WIOA as a way to critically analyze and ultimately "reset" the workforce system, the enactment of the federal act is also an opportunity to "reset"

the performance standards that were negotiated under the WIA. Over the next two years, Maryland's workforce system and its partner agencies are dedicated to establishing a baseline measure as they serve an increased number of customers entering the workforce system that were not served under previous models. In doing so, Maryland is reforming the operations of the workforce system and is truly placing people before performance measures.

Further, Maryland's efforts to increase and foster the growth of apprenticeship opportunities must be aligned with the workforce system. Previous efforts in apprenticeship focused heavily on the traditional trades-based models. However, in order to truly promote apprenticeships, greater opportunity must be given to expand this "earn and learn" model to other traditionally non-apprenticeable fields.

In aligning apprenticeship opportunities with Maryland's workforce system, a pipeline of talent is created. Businesses that participate will be able to train their employees in the skills they need to succeed. It further fosters a continuation of the career pathways approach to workforce development. Youth who pursue an apprenticeship opportunity will be able to obtain on-the-job training in a high-demand career of their choice. The same is true for those adults who wish to begin a new career path. Currently, DLLR has begun efforts to establish a cybersecurity apprenticeship in Maryland. Through working with and learning from Maryland's business community and stakeholders, the Department determined that establishing a talent pipeline for this emerging industry is key to the growth of the cybersecurity and information technology fields in the State. By aligning apprenticeships with the WIOA system, Maryland will ensure that traditional apprenticeship opportunities expand alongside the creation of new opportunities that are grounded in labor market demand.

(2) Goals. Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include—

- (A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment<sup>8</sup> and other populations.<sup>9</sup>
- (B) Goals for meeting the skilled workforce needs of employers.

This new collaborative approach to the workforce system, while not easy, is a necessity for Maryland's businesses and jobseekers. Thus, each decision regarding the workforce system must be centered on how the decision will affect jobseekers and businesses.

In 2015, Maryland identified the following strategies as key to support the workforce system in fulfilling its vision of "placing people before performance":

Desired Outcomes	Strategies for Accomplishing the Goals & Outcomes
Leverage existing resources and minimize costs	<ul style="list-style-type: none"><li>● Integrating technology and data sharing between WIOA partners</li><li>● Enhancing functionality of the MWE</li><li>● Streamlining service delivery between WIOA Partners</li><li>● Using a "systems approach," where partner strengths are relied on and maximized</li><li>● Reducing staff costs as a result of improved customer flow and access</li></ul>

Desired Outcomes	Strategies for Accomplishing the Goals & Outcomes
Increase access to education, training, and key services for individuals with barriers to employment	<ul style="list-style-type: none"> <li>● Integrating career pathway models in competitive grant applications</li> <li>● Expanding collaborative efforts to provide robust supportive services to customers</li> <li>● Strengthening input of customers (jobseekers and business) through implementation of continuous improvement plans for service delivery that involve customer satisfaction surveys, focus groups, etc.</li> <li>● Providing technical assistance and best practice resources</li> <li>● Expanding apprenticeship opportunities in high-demand industries</li> <li>● Ensuring the State has a robust Eligible Training Provider List</li> </ul>
Improve customer intake processes via standardization to reduce the amount of time it takes for a customer to engage in services	<ul style="list-style-type: none"> <li>● Creating metrics, process maps, and models</li> <li>● Implementing universal design practices</li> <li>● Implementing enhanced technologies that increase data sharing and access</li> <li>● Readily identifying and proactively engaging unemployed individuals in intensive reemployment strategies soon after job loss</li> </ul>
Increase focus on businesses and jobseekers as customers of the system	<ul style="list-style-type: none"> <li>● Enhancing business engagement through the development of comprehensive business services teams and strategies which align businesses, trade associations, trade unions, chambers of commerce, community colleges, and other community-based organizations with resources dedicated to business outreach</li> <li>● Creating regional business service units</li> <li>● Aligning of apprenticeship opportunities with workforce development</li> <li>● Expanding industry-driven models, like EARN</li> </ul>
Develop standards, policies, and procedures to ensure the sustainability of these best practice efforts throughout the State	<ul style="list-style-type: none"> <li>● Establish consistent and regular communication between WIOA Partners at leadership and service delivery levels</li> <li>● Increase collaboration between State agencies to determine best practices for service delivery</li> <li>● Reliance on subject matter experts throughout the WIOA system when developing policies and procedures</li> <li>● Soliciting input from WIOA system experts when creating State legislative agendas</li> <li>● Providing technical assistance and financial incentives to establish and sustain initiatives that are in line with this State Plan</li> </ul>

*Table 14: Key Strategies for Achieving State WIOA Goals*

In implementing the *Benchmarks of Success for Maryland's workforce system*, the State will continue to focus on employing these strategies. Additionally, the State will work to identify other strategies that could effectively support the State in realizing its vision.

(3) Performance Goals. Using the table provided in Appendix 1, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

See Appendix.

(4) **Assessment.** Describe how the state will assess the overall effectiveness of the workforce development system in the state in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment and other feedback to make continuous or quality improvements.

#### *Assessments, Performance and Alignment*

To ensure that the workforce system continuously improves, Maryland's WIOA partners must dedicate themselves to placing people before performance standards. In placing the customers (businesses and jobseekers) that rely on the workforce system at the center of the decisions that are made regarding the system, Maryland's WIOA partners must continue to strive for excellence, innovation, and the best service delivery possible. People who need the services the most will benefit from a system that operates out of realistic expectations and is empowered with the flexibility to take risks needed to serve target populations.

#### *Benchmarks of Success*

The *Benchmarks of Success for Maryland's workforce system* will be a framework used by Maryland workforce development system partners to build system effectiveness, support transparency about progress, and help State and local WIOA partners align resources and strategies with its intentions. The Maryland workforce system will work together to implement the *Benchmarks of Success*. The Benchmarks reflect a shared vision of excellence among the State's workforce system partners and provide a strategic tool for continuous improvement. As Maryland seeks to strengthen and enhance its workforce system through implementation of WIOA, success requires a commitment to innovation, collaboration, and readiness to take a true systems approach.

In order to guide the WIOA partners in this work, the *Benchmarks* set forth a clear vision, goals, and measurable achievements that will help gauge success, as the WIOA partners work to lay the foundation of this new system. In keeping with Maryland's commitment to place "people before performance," strategic goals and corresponding benchmarks are focused around a central vision of increasing the earning capacity of Marylanders by maximizing their access to employment, skills and credentialing, life management skills, and supportive services.

In implementing the Benchmarks, Maryland has re-purposed its WIOA workgroups, which will feed back into each other for continuous collaboration and improvement of services, data, and vision. The committees below form the infrastructure for achieving the vision.

Benchmarks of Success for Maryland's Workforce System – Committee Structure

Committee	Mission	Goals
Executive Steering Committee	The mission of the Executive Steering Committee is to provide strategic leadership for the rollout and implementation of	<ul style="list-style-type: none"><li>• Articulate vision and mission statements for the <i>Benchmarks of Success</i> initiative.</li><li>• Evaluate and approve the committee goals and timeline developed by the WIOA Alignment Committee.</li><li>• Champion the adoption of the Benchmarks across</li></ul>

<b>Committee</b>	<b>Mission</b>	<b>Goals</b>
	Maryland's <i>Benchmarks of Success</i> initiative.	agencies.
WIOA Alignment Group	The mission of the WIOA Alignment Group is to ensure that implementation of the Maryland WIOA State Plan and to facilitate system-wide adoption and implementation of the goals and benchmarks.	<ul style="list-style-type: none"> <li>• Evaluate committee goals and makes recommendations to the Executive Steering Committee.</li> <li>• Develop a detailed timeline that coordinates committee activities and identifies due dates for outputs.</li> <li>• Facilitate communication between the committees.</li> <li>• Identify goals for operationalizing the <i>Benchmarks of Success</i> and evaluate the effectiveness of efforts across the project and make adjustments as needed.</li> <li>• Build an efficient workforce system through staff training and information sharing, increase collaboration, streamline service delivery using a “systems approach” where necessary partner strengths are maximized, and improve customer flow and access.</li> <li>• Maximize technology to ensure a collaborative system through: the integration of technology and data sharing between WIOA Partners; enhancing functionality of the MWE; the creation of metrics, process maps, and models; work towards full accessibility of websites and web presences for those with disabilities; and, implement enhanced technologies that increase data sharing and access.</li> <li>• Ensure a system that serves all and is accessible to individuals through the development of clear guidelines outlining the process for managing and referring customers between and among partners; ensure provision of culturally appropriate materials and services; implement universal design practices; create multiple access points to increase outreach; and to ensure that all jobseekers can access services.</li> </ul>
Data and Dashboard	The mission of the Data and Dashboard Committee is to develop a consistent, sustainable system all workforce partners can use to measure, analyze, display and apply Benchmarks data to continuously improve the quality and effectiveness of	<ul style="list-style-type: none"> <li>• Produce a glossary of terms.</li> <li>• Develop metrics to assess Local Area baselines for benchmarks.</li> <li>• Develop a timeline for activities.</li> <li>• Measure system progress in meeting benchmarks over time.</li> <li>• Develop processes and tools for reporting local performance.</li> <li>• Provide ongoing technical assistance for data analysis-related issues.</li> <li>• Explore potential platforms for data sharing across partner agencies, such as the MD Think.</li> </ul>

Committee	Mission	Goals
	services.	<ul style="list-style-type: none"> <li>Maintain communication with the WIOA Alignment Workgroup.</li> </ul>
Professional Development and Technical Assistance	To produce, disseminate, and facilitate professional development and technical assistance programming that supports Maryland's WIOA partners in what the Benchmarks are and how they can be used to drive continuous improvement.	<ul style="list-style-type: none"> <li>Analyze training needs and audiences.</li> <li>Develop training on the <i>Benchmarks of Success</i> for Local Area workforce system managers and frontline staff.</li> <li>Develop training on the <i>Benchmarks of Success</i> for Local Boards.</li> <li>Create technical assistance events and tools to help Local Areas use the benchmarks effectively.</li> <li>Produce a timeline for rollout of training products that is coordinated with other elements of the <i>Benchmarks of Success</i> initiative.</li> <li>Maintain communication with the WIOA Alignment Workgroup.</li> </ul>
Policy	The mission of the Policy Committee is to identify opportunities to support the implementation of the Benchmarks via policy change.	<ul style="list-style-type: none"> <li>Identify alignment opportunities for the <i>Benchmarks of Success</i> across programs and funding streams.</li> <li>Identify policy needs related to <i>Benchmarks of Success</i> implementation.</li> <li>Research best practices to identify innovations.</li> <li>Identify opportunities to integrate / formalize <i>Benchmarks of Success</i>.</li> <li>Maintain communication with the WIOA Alignment Workgroup.</li> </ul>
Communications	The mission of the Communications Committee is to educate stakeholders internal and external to the State's workforce development system on the <i>Benchmarks for Success</i> initiative, and facilitate system-wide adoption and implementation of the goals and benchmarks through clear communication.	<ul style="list-style-type: none"> <li>Develop a strategic communications plan to support the successful rollout and effective implementation of the <i>Benchmarks</i> initiative that includes: <ul style="list-style-type: none"> <li>The identification of internal stakeholders in the State's workforce development system as well as external stakeholders who use and benefit from system services;</li> <li>Clear value statements for the <i>Benchmarks</i> that are relevant for each of the targeted stakeholder groups;</li> <li>Individualized communication strategies that are designed to be effective in reaching specific target audiences;</li> <li>An implementation timeline coordinated with the activities of the other committees that identifies milestones and due dates.</li> </ul> </li> <li>Provide guidance and oversight for the implementation of the communications plan.</li> <li>Develop branding and messaging deliverables.</li> <li>Maintain communication with the WIOA Alignment Workgroup.</li> </ul>

Committee	Mission	Goals
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*Table 155: Benchmarks of Success for Maryland’s Workforce System – Committee Infrastructure*

#### *Jobseeker Advisory Focus Groups*

Maryland’s customer–centric approach requires that the WIOA partners continue to meet the needs of jobseekers and businesses who utilize the services of the WIOA system. As GWDB continues to ensure that businesses are proactively engaged and that the voice of business is represented, the WIOA partners are also dedicated to establishing a Jobseeker Advisory Focus Groups. To ensure that Maryland’s workforce system continually focuses on placing people before performance, this effort will engage jobseekers throughout the state in an effort to better understand the barriers they face in securing employment. The focus groups will advise the workforce system by giving a voice to the jobseekers it serves. As Maryland’s system continues to dedicate its efforts to those with barriers to employment, the focus groups will ensure that the WIOA partners are continually aware of the barriers faced by jobseekers and workers in securing and maintaining stable employment, and earning a family–supporting wage. Engagement of focus groups will allow the WIOA partners to further develop an understanding of how processes could be streamlined from a customer’s point of view. Members of these focus groups could also help improve the reemployment efforts, Rapid Response, and other programs provided at the AJCs throughout the state by providing first-hand information on how these programs can help jobseekers overcome the barriers they face in order to become re-employed quickly. The WIOA partners will develop a process upon which customers are selected to participate in the focus groups without interrupting their lives. Local Areas are also encouraged to include in their local plans how they intend to engage jobseekers who use their services.

#### *Maryland State WIOA Convenings*

The WIOA partners recognize that continuous communication is necessary to ensure that Maryland’s customer–centric workforce model is not just words on a page. Maryland’s WIOA partners have convened on three different occasions to bring together local, state, and federal subject matter experts to break down silos and plan a path forward for the State of Maryland, concerning the implementation of WIOA.

The first convening, in the summer of 2016, communicated the vision for an integrated system, as set forth in the first edition of this State Plan. The goal of the convening was to ensure that the provisions set forth in the Maryland State Combined Plan would be implemented in the most effective and efficient way to better serve Maryland’s jobseekers and businesses.

The second convening, in the winter of 2016, focused on improving outcomes of TANF recipients. For this event, the WIOA partners worked with Mathematica to discuss how the state and local service areas might design and implement WIOA initiatives that will increase the earnings of low-income job seekers who are served by the TANF and/or Workforce systems.

The third convening, in the winter of 2017, unpacked the WIOA Section 188 Nondiscrimination and subsequent guidance, overviewing topics such as the State Nondiscrimination Plan and Language Access Plan, compliance deadlines, Benchmarks, WIOA target populations and priority of service, and cultural competency. In-depth topics will include language access

training, Equal Opportunity Officer Training, disability accessibility, the discrimination complaint process, understanding immigration and eligibility documents, and more.

In all, Maryland is dedicated to ensuring that communication regarding the state's implementation efforts is not a singular event. The WIOA partners are committed to incorporating mass communication systems, such as GovDelivery, to ensure that important messages regarding implementation are continually provided to frontline staff and local providers. Furthermore, Maryland is dedicated to utilizing WIOA implementation funding to ensure that local and state staff are provided professional development and other training opportunities.

**(c) State Strategy.** The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

(1) Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). "Career pathway" is defined at WIOA section 3(7). "In-demand industry sector or occupation" is defined at WIOA section 3(23).

Businesses serve as partners to the workforce system by providing input regarding in-demand training needs, and policy guidance for the system to ensure that initiatives are driven by industry demands. As businesses change and adapt to labor markets, a workforce development system that successfully partners with business must also evolve to ensure that jobseekers receive proper training and opportunities for in-demand careers.

Maryland is committed to meeting the needs of its business community while also providing jobseekers with career pathways in in-demand sectors through making strategic investments in: (1) EARN Maryland; (2) RA; and (3) career pathway initiatives. The following provides details on the specific financial and technical assistance investments Maryland plans to make.

### *EARN Maryland*

Employment Advancement Right Now (EARN) Maryland is the State's nationally-recognized, sector-based workforce program. The program, which is overseen by the DLLR, is industry-led, designed to address business workforce needs by focusing on industry sector strategies that produce long-term solutions to sustained skills gaps and personnel shortages. The success of the program is seeded in collaboration among a diverse group of partners, including employer and industry partners, non-profit and community-based organizations, and workforce, economic development, and education partners. Based upon employer-identified training needs, Strategic Industry Partnerships provide education and skills training to unemployed and underemployed Marylanders, including support for individuals with specific barriers to employment. EARN also provides career advancement strategies for incumbent workers.

Since the program began in 2014, EARN has been recognized as a national best practice for its innovation and implementation of sector strategies. In 2015 and 2016, the National Skills Coalition and Urban Institute praised EARN as a leader in industry-led workforce initiatives. In

2017, EARN was highlighted at the National Conference for State Legislatures as a model to be emulated. Additionally, at the request of the National Skills Coalition, EARN Maryland staff provided technical assistance to states seeking to establish an EARN-like sector strategy program.

EARN focuses on three distinct subsets of the workforce: unemployed, underemployed, and incumbent workers. Regardless of industry and region of the State, employers identify a similar challenge around recruiting candidates with the appropriate skillsets for employment. As of October 2017, 2,767 unemployed and underemployed participants completed entry level training programs. Of those, 2,323 (84 percent) obtained employment. As a result of their participation in EARN, employers have a steady pipeline of candidates with relevant skills to consider for hire, thus decreasing screening, interviewing, and training costs and reducing worker turnover.

Additionally, employers identify incumbent worker training as a cost-prohibitive yet indispensable tool that is critical for expansion, retention, and improved business outcomes. As of October 2017, over 4,400 incumbent workers have participated in training, earning a new skill, certification or credential. Employer partners identify many benefits to their employees participating in EARN training, including increased cost savings, productivity and retention.

Recognizing the success of the program, Governor Hogan invested in EARN through appropriations in the FY 2018 budget to ensure Maryland employers have the talent they need to compete and grow in key industries. Specifically, \$3 million was earmarked to be invested to promote training in Cyber and Information Technology. Over the next three years, \$1 million annually will be provided for green jobs training. These investments by Governor Hogan have doubled the program budget for FY18 and will allow a larger number of employers to benefit from this industry-driven program.

The WIOA Partners are committed to looking for opportunities to expand, promote, and raise awareness about this industry-driven model.

### *Registered Apprenticeship*

Maryland continues to focus its efforts on Registered Apprenticeship expansion. The State's goal is to fully align Registered Apprenticeships with the Maryland workforce system to provide Maryland's businesses with a sustainable employment pipeline in both traditional and non-traditional industry sectors.

To effectively expand Registered Apprenticeship, Maryland remains focused on expanding capacity by: (1) increasing staffing and infrastructure; (2) strategically conducting outreach and education with stakeholders, including the business community and the WIOA Partners; and, (3) advancing innovative practices.

To strengthen the infrastructure, in October 2016, the Maryland Apprenticeship and Training Program was transferred to the Division of Workforce Development and Adult Learning with the enactment of Senate Bill 92.

Also in 2016, the United States Department of Labor awarded DLLR \$2.2 million to accelerate and expand Registered Apprenticeship opportunities within the State. As a result, Maryland is seeing tremendous overall growth both in skilled trades-based Registered Apprenticeships as well as non-traditional areas, such as health care and information technology.

Using USDOL grant funding, DLLR established its “Apprenticeship Innovation Fund” to invest in programs that support and enhance Registered Apprenticeship expansion strategies, particularly for vulnerable populations, youth, and dislocated workers. Through this fund, the Department dedicated over \$600,000 in early 2017 to award competitive grants to applications, so that they may implement new and promising ideas or adapt proven strategies, at the systems or service delivery level, to expand the reach of Registered Apprenticeship programs in Maryland.

Maryland will remain focused on supporting its business community and jobseekers with this proven earn-and-learn model.

#### *Career Pathway Investments*

Maryland continues to prioritize support for career pathway initiatives by providing technical assistance and funding. A strong career pathway system will ensure Maryland’s job seekers are offered education and skills training along with the necessary credentials to meet industry demands.

In 2017, DLLR committed \$1,000,000 of Maryland’s WIOA Set Aside funding to supporting Local Areas in implementing career pathway demonstration projects that will increase training and employment opportunities for Marylanders who do not yet possess high school diplomas and/or limited English proficiency. Through this initiative, the Department aims to fund demonstration projects that pilot interventions involving proven strategies, such as pre-apprenticeship training, English Language Acquisition, distance learning, bridge programming, pathways to employment for out-of-school youth, and more.

Maryland will continue to actively pursue opportunities to further build capacity for sustainable career pathways throughout the State. By investing in career pathways, the state’s local workforce agencies and partners will strengthen the link between adult education, workforce training, and our businesses.

(2) Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional AJC partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2).

In order for the Plan to succeed, leadership from the WIOA Partners must ensure that the programs they administer adapt and effectively integrate to ensure seamless delivery of services for the workforce system’s collective customers. This requires a greater level of communication between the WIOA Partners, as well as a communication throughout the system. The constituent

programs within Maryland's workforce system must be aligned to provide businesses and jobseekers with the best possible service.

### *Maryland's WIOA Alignment Group*

In 2015, the WIOA Partners established a WIOA Alignment Group to ensure a smooth transition into WIOA. To date, the Alignment Group has been critical to Maryland's successful implementation of the WIOA State Plan. Therefore, the Alignment Group will continue to meet monthly and will continue to serve as a forum for the WIOA Partners to collaboratively approach the challenges of WIOA implementation.

The Alignment Group will include leadership from the key programs represented in the Maryland State Plan. At a minimum, the Alignment Group will be comprised of the following:

- At least one representative of the GWDB;
- At least one representative from the Maryland DLLR's DWDAL;
- At least one representative from the Maryland DLLR's DUI;
- At least one representative from the Maryland DHS' FIA;
- At least one representative from the MSDE's DORS;
- At least two Local Board representatives;
- At least one local representative from the DORS;
- At least one local representative of a WIOA Title II adult education service provider;
- At least one representative from a Local Department of Social Services (LDSS).

The Alignment Group will continue to receive strategic direction from the GWDB along with the newly established *Benchmarks of Success* Executive Steering Committee. The Alignment Group will, in turn, provide key oversight to ensure the successful, collaborative implementation of the Maryland WIOA State Plan and to facilitate system-wide adoption and implementation of the new *Benchmarks of Success* initiative.

When developing and/or revising the WIOA State Plan, the WIOA Alignment Group should review membership to ensure the Group maintains appropriate levels of representation. The Group should further ensure that Maryland's WIOA Work Groups exist to support the execution of the vision and goals outlined in this State Plan.

The Maryland DLLR's DWDAL should ensure that the Alignment Group has the appropriate level of staff support to function effectively. It is important to note, however, that the Group is intended to serve as a collaborative, joint decision-making body where no one agency or individual has sole authority or ownership.

### *Communications*

For Maryland to achieve its goal of strengthening and enhancing the effectiveness and efficiency of the State's workforce system, it is paramount that the WIOA Partners prioritize clear, consistent communication between partners.

Recognizing the importance of a clear communication strategy, the WIOA Partners are committed to regularly:

- Support transparency about progress in implementing the WIOA State Plan;
- Leverage technology to communicate en masse about important initiatives, policies and other updates via the WIOA distribution list (Anyone can sign up here: [https://public.govdelivery.com/accounts/MDDLLR/subscriber/new?qspl=MDDLLR\\_3](https://public.govdelivery.com/accounts/MDDLLR/subscriber/new?qspl=MDDLLR_3));
- Offer cross-agency technical assistance and professional development events; including in-person statewide WIOA Convenings;
- Educate stakeholders internal and external to the State's workforce system on the *Benchmarks of Success initiative* that includes:
  - The identification of internal stakeholders in the State's workforce development system as well as the external stakeholders who use and benefit from system services;
  - Clear value statements that are relevant for each of the targeted stakeholder groups;
  - Individualized communication strategies that are designed to be effective in reaching specific target audiences;
- Leverage social media to conduct effective outreach and to reinforce messages;
- Promote WIOA Partner initiatives, events and services, as appropriate;
- Embrace the "AJC" common identifier and invest in branding efforts to ensure that consistent messaging exists across the State and to increase Marylanders' familiarity with the services available through the WIOA network;
- Develop and refine outreach materials targeted at jobseekers and businesses; and,
- Identify and implement strategies that will enhance and continuously improve communications internal and external to the WIOA Partners.

#### *Refocusing of the Maryland WIOA Workgroups*

In the Fall of 2017, Maryland reconfigured its WIOA Work Groups to support the successful implementation and adoption of the *Benchmarks of Success* initiative. In addition to the Executive Steering Committee and the WIOA Alignment Group, the following Work Groups will be established and meet so long as the WIOA Alignment Group deems appropriate:

- Communications – To promote the *Benchmarks of Success* initiative and to educate Maryland's workforce system on the value, implementation, and outcomes of the initiative;
- Policy – to identify opportunities to support the implementation of the *Benchmarks of Success* via policy change;
- Data and Dashboard – To create a sustainable system that supports Local Areas in using the *Benchmarks of Success* to continuously improve the quality of their service delivery;
- Professional Development & Technical Assistance – To produce, disseminate, and facilitate professional development and technical assistance programming that supports Maryland's WIOA partners in what the *Benchmarks of Success* are and how they can be used to drive continuous improvement.

### *Jobseeker Advisory Groups*

Maryland's customer-centric approach requires that the WIOA Partners continue to meet the needs of jobseekers and businesses who utilize the services of the WIOA system. Just as the GWDB continues to ensure that businesses are proactively engaged and that the voice of business is central to decision making, the WIOA Partners are also dedicated to establishing Jobseeker Advisory Groups. This effort will engage jobseekers throughout the State in an effort to better understand the barriers they face in securing and maintaining employment. The focus groups will advise the workforce system by ensuring a strong voice from the jobseekers it serves. As Maryland's system continues to dedicate its efforts to those with barriers to employment, the focus groups will ensure that the WIOA Partners maintain a deep understanding of the barriers faced by jobseekers and workers in securing and maintaining stable employment, and earning a family-supporting wage. Engagement of focus groups will allow the WIOA Partners to further develop an understanding of how processes could be streamlined from a customer's point of view. Members of these focus groups could also help improve the reemployment efforts, Rapid Response, and other programs provided at the AJCs throughout the State by providing first-hand information on how these programs can help jobseekers overcome the barriers they face in order to become reemployed quickly. The WIOA Partners will develop a process upon which customers are selected to participate in the focus groups without interrupting their lives. Local Areas are also encouraged to include in their local plans how they intend to engage jobseekers who use their services.

### **III. OPERATIONAL PLANNING ELEMENTS**

(a) **State Strategy Implementation.** The Unified or Combined State Plan must include—  
(1) State Board Functions. *Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision making processes to ensure such functions are carried out).*

The GWDB is responsible for advising the Governor on the development of strategies and policies to form a coordinated WIOA-compliant workforce system by integrating a variety of education, employment, and training programs. The GWDB brings together and focuses various workforce development partners and stakeholders on two key outcomes – ensuring there is a properly prepared workforce that meets the current and future demands of Maryland employers, and providing opportunities for all Marylanders to succeed in the 21st century workforce.

GWDB Mission: To guide a nationally-recognized workforce development system that aligns with the economic and educational goals of the State of Maryland and will result in a qualified workforce available to employers across the State.

GWDB Vision: A Maryland where every person maximizes his or her career potential and businesses have access to the human resources they need to be successful.

The vision includes:

- Alignment of the business, workforce system, and economic development interests in Maryland
- Well-integrated, coordinated, and collaborative systems across agencies, institutions, Local Areas, and business
- Preservation and expansion of Maryland's highly-educated workforce
- Creation of opportunities for all Maryland residents to participate and succeed in the workforce.

To ensure the State's workforce board's functions are successfully carried out pursuant to the WIOA, the GWDB includes the following key oversight and management positions:

- *GWDB Chairperson* who presides over all meetings, appoints committees, and is responsible for leading the Board in its activities and for serving as the principal liaison between the Governor and the Board. As necessary to facilitate the Board's performance of its WIOA duties and responsibilities, the Chairperson duties include: facilitating and

driving high-performance governance; setting the proposed agenda with the Executive Director; holding task force committees accountable; communicating and coordinating with the Executive Director; managing and facilitating meetings; appointing members to committees; serving as an ambassador, and various advocacy and public relations responsibilities.

- *An Executive Committee* that is comprised of ten GWDB Board members— six members of business, three government representatives, and one member representing community-based organizations. The Executive Committee develops recommendations to the Board in the areas of strategic planning, legislation, and operations. One of their primary duties is to develop the agenda for full Board meetings.
- *An Interagency Workforce Committee* that is comprised of senior officials from the GWDB's partner agencies. The Committee's purpose is to coordinate and align workforce development initiatives and policies to meet the demands of Maryland's industries.
- *GWDB Staff* provide strong administrative support to the Board in its efforts to carry out its WIOA functions.

The GWDB has established five task forces to ensure there is a properly prepared workforce that meets the current and future demands of Maryland employers:

- *The Cybersecurity and Information Technology Task Force* that includes leaders and experts from businesses, universities and non-profits to ensure education and instruction aligns with employer needs within the cybersecurity and information technology industry.
  - The task force continuously works to create a pipeline of talent for employers and to create a career mapping asset that will allow Maryland residents to readily identify skills and training that is needed to work within the cybersecurity and IT industry.
  - Per Executive Order 01.01.2017.27, the task force was recently commissioned to develop a report on cybersecurity and consult on the distribution of grant money designed to help schools provide better education in the cybersecurity field.
- *The Manufacturing and Skilled Trades Task Force* that includes industry leaders and school representatives to ensure that Maryland students are aware of opportunities in the manufacturing and CTE fields across Maryland.
  - Maryland currently has thousands of open jobs in manufacturing and construction. The task force seeks to establish a pipeline that will connect Maryland students to gainful employment within these industries.
- *The Healthcare and Life Sciences Task Force* that includes industry leaders and experts and seeks to establish a viable pipeline of talent to hospitals, nursing homes, and medical companies.
  - The task force works with hospitals and professionals in the medical field to determine future needs; educational professionals are included in the task force in order to ensure applicable course work and instruction.
- *The Workforce Inclusion Diversity and Equality Task Force* that includes experts across multiple industries within Maryland and seeks to ensure that underrepresented populations are consistently involved in the alignment of education and workforce.

- The task force actively seeks to connect underrepresented populations to new industries and gainful employment.
- *The Marketing and Branding Task Force* that comprises professionals across multiple industries and is designed to champion the work of the GWDB and other task forces throughout Maryland industries.
  - The task force works to produce opportunities to connect new employers and potential employees.

The GWDB continues to ensure that all task forces are focused on ensuring opportunities are provided for all Marylanders to succeed in the 21st century workforce.

(2) **Implementation of State Strategy.** Describe how the lead State agency with responsibility for the administration of each core program or a Combined State Plan partner program included in this plan will implement the State's Strategies identified in II(c) above. This must include a description of—

(A) *Core Program Activities to Implement the State's Strategy.* Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.

To support Maryland's comprehensive and collaborative workforce system, the Maryland WIOA Partners are committed to ensuring effective coordination and alignment of the State's WIOA programs through strategic policy development, coordinated resource sharing, and collaboration with local and regional partners. Together, Maryland's WIOA Partners will facilitate the creation of a strong, skilled workforce that effectively connects with businesses to help them compete in the global, State, and local economies. Consistent with Governor Hogan's vision, the WIOA Partners will continue to ensure that customers are provided with the services they need, in a way that avoids duplication of programs and activities carried out through the system.

In commitment to the *Benchmarks of Success*, the WIOA Partners will also conduct strategic outreach to entities outside of the formal WIOA network to: (1) educate them on the vast array of services, programs and supports available through the WIOA network in an effort to raise awareness among their customers; and, (2) to learn about the available services and supports that exist outside of the WIOA network that could potentially benefit jobseekers, such as health resources, child care services, financial empowerment tools, and library resources.

DLLR's DWDAL lead the State WIOA workforce system's implementation of operational protocols, programs, and practices. The Division is committed to the collaborative implementation of policies and procedures that promote systems improvement, efficient operations within the AJC system, and the expansion of established best practices related to service provision. Maryland is positioning itself to make certain that investments in the State's workforce system foster an ecosystem of innovation. With a commitment to continuous improvement, Maryland will continue to take a customer-focused approach to workforce development issues to successfully meet both jobseeker and business needs.

*(B) Alignment with Activities outside the Plan.* Describe how the activities identified in (A) will be aligned with programs and activities provided by required AJC partners and other optional AJC partners and activities provided under employment, training (including RAs), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.

Collaboration is the hallmark of the State's implementation of WIOA. In the Executive Summary of the 2015 version of the State Plan, Maryland committed to implementing provisions of WIOA in a collaborative and inclusive manner. The WIOA partners committed at that time that for “[w]ith every regulation promulgated pursuant to the federal Act, with every guidance issued by the federal agencies charged with oversight of the programs included in this Plan, with every technical assistance and training received, Maryland dedicates to learn together, to discuss the pressing issues, and to come to lasting solutions for our collective customers.” In doing so, the WIOA partners outlined a strategy to “place people before performance.” This strategy pushed Maryland’s WIOA partners to find new opportunities to focus on a customer’s needs and to tailor solutions to address those needs.

Maryland’s WIOA partners continue to search for new opportunities to engage state, local, and non-profit entities for the benefit of our common customer. Since the formation of the State Plan, the WIOA partners have developed deeper relationships across programs in an attempt to better leverage resources and to deliver services in a more collaborative and innovative way. The following are examples of how Maryland has leveraged the federal Act as a catalyst for change.

### *Apprenticeships*

The Hogan Administration has dedicated to making Registered Apprenticeships the premiere workforce solution. The State’s goal is to align apprenticeships with the Maryland’s workforce system, to ensure that traditional apprenticeship opportunities expand alongside the creation of new opportunities grounded in labor market demand.

The National Skills Coalition, in a July 2016 report, applauded Maryland’s vision to invest in Registered Apprenticeship and other innovative training connected to jobs. During the 2016 Legislative Session of the Maryland General Assembly, the Department sponsored Senate Bill 92, a measure that transferred the State’s apprenticeship programming to the Division of Workforce Development and Adult Learning. This legislative enactment, approved unanimously by the Assembly and signed into law by Governor Hogan, provides key resources for the growth and expansion of apprenticeships. Since then, the states of Pennsylvania and Delaware have similarly taken the same legislative action.

In 2016, the Maryland Department of Labor, Licensing and Regulation was awarded \$2.2 million from the United States Department of Labor in for the acceleration and expansion of apprenticeship opportunities in the State. Both the ApprenticeshipUSA Acceleration Grant and the ApprenticeshipUSA Expansion Grant invest in the State’s Registered Apprenticeship programming. The funds provided under the grant are vitally important to this effort to address the pressing workforce needs of Maryland’s businesses.

Maryland continues to use the grant funds and leveraged resources to grow and diversify Registered Apprenticeships. The end goal is to provide Maryland's business with a sustainable employment pipeline in both traditional and non-traditional industry sectors focusing on three critical elements:

### **1. Expanding Capacity by Increasing Staffing and Infrastructure**

- To grow pre-apprenticeship and Registered Apprenticeship opportunities, key infrastructure investments are needed in Maryland's Apprenticeship Office. Currently, Maryland's apprenticeship unit consists of three individuals: a Program Manager, an Apprenticeship Training Representative (ATR), and a Navigator.
- This staff serves the needs of over 8,400 active apprentices and 3,500 participating employers in Maryland. The team works with over 230 approved registered occupations and maintains 417 programs statewide.
- Recognizing the limitation of current staff and noting that growth requires a deeper and continued investment in human capital, DLLR intends to expand this unit's personnel through the addition of five Navigators and one Apprenticeship Training Representative.

### **2. Outreach/Education**

- Maryland has already created unique learning opportunities. DLLR held an all-day training, "Accelerating Apprenticeships in Maryland," on June 28, 2016. This professional development opportunity was conducted by national expert, Dr. Gerald Ghazi, and was made possible through ongoing technical assistance Maryland received through USDOL.
- The State also hosted a portion of the inaugural Transatlantic Apprenticeship Exchange Forum held in Washington, D.C. and Baltimore with representatives from the United Kingdom's apprenticeship program.
- Industry engagement and participation is also key to the successful expansion of RA in Maryland. Outreach to chambers of commerce and industry associations, such as the Tech Council of Maryland (TCM), and state and local Workforce Development Boards will occur. This will provide one of several opportunities to engage industry to develop multi-employer programs and program templates. Lastly, relationships with over 500 industry sector partnerships through EARN will be nurtured.

### **3. Advancing Innovative Practices**

- To build upon these proven, existing partnerships with industry and workforce intermediaries, local workforce development areas, training providers, and institutions of postsecondary education, DLLR established an "*Apprenticeship Innovation Fund*" to invest in programs that support and enhance RA expansion strategies, particularly for vulnerable populations, youth, and dislocated workers. The Department dedicated \$621,000 in early 2017 to award competitive grants to applicants, so they may implement new and promising ideas, or adapt proven

strategies at the systems or service delivery level, so as to expand the reach of Registered Apprenticeship programs in Maryland. This competitive grant structure has proven effective through Maryland's implementation of its Maryland Business Works incumbent worker training fund. In April 2017, the State announced the first four recipients of funding from the Apprenticeship Innovation Fund.<sup>xxvi</sup>

In addition, the State applied for, and received an additional award to institute a pilot program aimed at mitigating the hiring challenges found within the healthcare industry by drawing on an untapped resource, internationally trained skilled immigrants. The Baltimore Alliance for Careers in Healthcare, the entity serving as the sponsor for the pilot initiative that includes Baltimore area hospitals such as Johns Hopkins Hospital, was obtained approval from the Maryland Apprenticeship and Training Council to employ a competency based model.

The State has been able to leverage events during National Apprenticeship Week to increase involvement from Local Areas and the WIOA partners. Maryland's Office of Apprenticeship and Training has provided training opportunities for Local Areas and WIOA partner staff to become more familiar with Registered Apprenticeship opportunities. Maryland is continuing to make a concerted effort in getting Registered Apprenticeship sponsors on the Eligible Training Provider List. Since 2017, the State has seen the list grow from 0 sponsors participating to over 30 by the end of the calendar year. Also in 2017, Prince George's County engaged with its Registered Apprenticeship sponsors to hold the State's first Registered Apprenticeship Job Fair. These activities are all gear toward greater collaboration between the workforce system and Registered Apprenticeships.

#### *Skilled Immigrant Task Force*

Recognizing the detrimental effects of brain waste on our economy as well as the economic hardships of immigrants looking for employment opportunities that align with their professional backgrounds and training, Maryland submitted a Letter of Interest (LOI) to the White House National Skills and Credential Institute in 2016. The LOI identified four key barriers to the integration of skilled immigrants in Maryland's workforce, including:

- **Limited English Proficiency (LEP)**  
Even though most foreign educated individuals possess technical skills needed to perform skilled jobs, they often lack the English proficiency necessary to communicate effectively in a workplace. A study by the Migration Policy Institute found that Maryland has 113,000 LEP individuals who have completed some form of college or higher.
- **Complex licensing and credentialing processes**  
Many professional careers in the United States are within regulated professions, many of which are regulated at the state level. In order to return to previous professions, immigrants have to undergo licensing processes that are particularly complex due to foreign credentials not often well understood or fully recognized. In addition, the licensing process is costly, timely, and confusing for many immigrants.
- **Limited experience of Maryland's workforce system in working with foreign-born individuals**  
The ability to assist foreign-born individuals navigate the complex workforce development system requires specialized accommodation and the provision of culturally

appropriate services that is often lacking at the local level. Staff at local American Job Centers and other federal or state funded workforce projects may not be fully equipped to address the needs of a skilled immigrant seeking to re-enter their profession.

- **Lack of social capital on the part of immigrants**

Numerous studies assert the importance of social connections to find employment. For many newly arrived immigrants who have little to no social connections, finding a job can be difficult despite having all other qualifications.

The Maryland Skilled Immigrant Task Force was created in June 2016 to address these issues, believing that the State of Maryland could lead the way in creating a win-win environment in which immigrants secure jobs that match their professional and educational backgrounds while simultaneously meeting the hiring demands of the business community.

While the Task Force was co-sponsored by two State agencies: the Department of Human Services (DHS) and the Department of Labor, Licensing and Regulation (DLLR), many other organizations contributed toward its inception, including Baltimore City Community College, the Baltimore Mayor's Office for Immigrant and Multicultural Affairs, City of Baltimore Mayor's Office of Employment Development, Gilchrist Center for Cultural Diversity of the Montgomery County Government, International Rescue Committee, Lutheran Immigration and Refugee Service/Higer, Montgomery College, Upwardly Global and the Welcome Back Center of Suburban Maryland.

Within DHS' Family Investment Administration is the Maryland Office for Refugees and Asylees (MORA), which provides support and services to federally-recognized refugees and other humanitarian immigrants including asylees, certified Victims of Trafficking, Special Immigrant Visa holders from Iraq and Afghanistan, Cuban and Haitian entrants, and certain Amerasians. MORA has helped more than 40,000 refugees and eligible humanitarian immigrants make Maryland their home through a state-wide network of public and private organizations. MORA provides transitional cash assistance, employment services, English for Speakers of Other Languages (ESOL) classes, vocational training, health case management, and other supportive services. MORA partners assist individuals to become independent, contributing members to the national and local economy through a number of transitional services aimed at helping the clients achieve social and economic self-sufficiency.

The taskforce has already provided key input into the workforce system. In 2017, the taskforce issued the first ever Workforce System Survey. The survey requested WIOA partners from DLLR, Local Areas, DORS, and local departments of social services to answer questions about how the workforce system engages immigrants and those with limited English proficiency. The taskforce was also key in establishing Maryland's Third WIOA Convening held in January 2018. That convening focused on training for Local Areas and state staff on the provisions of Section 188 of WIOA, the State's Non-Discrimination Plan, and the State's proposed Language Access Plan.

### *Two-Gen*

Since the drafting of the State Plan in 2015, Maryland is beginning to implement strategies designed to address intergenerational poverty. The State has leveraged relationships with the

Annie E. Casey Foundation and Ascend at the Aspen Institute to explore how the workforce system can utilize the 2Gen approach.

The State administers a number of federally mandated programs that have previously existed in silos. Many of these programs are also geared primarily to the adult participant. As a result, individuals who qualify for Temporary Assistance for Needy Families (known in Maryland as Temporary Cash Assistance), workforce training under the federal Workforce Innovation and Opportunity Act, SNAP, energy assistance, adult literacy services, housing subsidies, and other government benefits and subsidies are forced to travel from agency to agency. While at those agencies, customers must complete necessary paperwork in order to determine whether they are eligible for services. The process to gather this information may take, in some instances, hours. Additionally, the customer may be required to provide the same information to multiple agencies.

Simultaneously, other state agencies provide programs and opportunities for youth. Early childhood education through programs such as Head Start and youth employment opportunities for those with disabilities through the Maryland PROMISE provide youth with critical cognitive, behavioral and vocational skills.

Linking policies, systems, and programs together to simultaneously serve parents and children is at the heart of the 2Gen approach. This model is not another government program. It is not an approach that is owned by one particular agency, nor can it be. Rather, Maryland's agencies must together place the family at the center of the way that it delivers services. In doing so, the short term interventions currently being used to support the family gives way. In turn, the family is placed on a sustainable path and the cycle of intergenerational poverty is truly broken.

The 2Gen approach, according to Ascend at the Aspen Institute, is “an antipoverty initiative that provides support for both children and parents together. This approach has proven effective at breaking children and their families free from the traps of poverty and empowering them to live up to their full potential.” A 2Gen approach to service delivery:

- Removes unnecessary silos
- Integrates programs to work across generations
- Focuses on a holistic, family-centric service delivery
- Streamlines services to empower children and families.

With the family’s self-sufficiency at the center, 2Gen interventions will focus on education, workforce development, economic stability, high-quality child care, health and well-being, and family engagement. The 2Gen approach also maximizes the family’s social capital insomuch that it adds to the community of support for the family and its well-being.

In 2017, Governor Hogan, through executive order, established the Two-Generation Family Economic Security Commission and Pilot Program. Under the provisions of the Executive Order, the Commission is charged with investigating policy challenges, opportunities, and recommendations regarding the mitigation of multigenerational poverty as follows:

1. Identify services and policies within State programs that can be coordinated to support a multigenerational approach;
2. Identify program and service gaps and inconsistencies between federal, State policies and local policies;
3. Identify, test, and recommend best practices utilized on federal, State and local levels;
4. Solicit input and guidance regarding Two-Generation Approach practices and policies from external sources with direct knowledge and experience in the field of multigenerational poverty including, but not limited to, Two-Generation Approach practicing states, federal and Maryland Agencies, private foundations, community-action partnerships, and welfare-advocacy organizations.

The WIOA partners are also dedicated to finding ways how the 2Gen approach could be utilized to establish family oriented job centers. Specifically, the Department of Labor, Licensing and Regulation is dedicated to utilizing funding from the Governor's Setaside to pilot this innovative approach.

*(C) Coordination, Alignment and Provision of Services to Individuals.* Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional AJC partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals including those populations identified in section II(a)(1)(B). The activities described shall conform to the statutory requirements of each program.

#### *Jobseekers as Customers: Coordination, Alignment, and Provision of Services*

For jobseekers—especially for those jobseekers who are unemployed or who face barriers to employment—this approach means that the State will strive to ensure customers who are receiving multiple services across agencies are not discouraged or disenfranchised by unnecessary bureaucracy. Instead, Maryland customers will feel encouraged and assisted by the workforce system because the WIOA Partners will continue to communicate often and effectively, taking action to align efforts across programs when possible. The WIOA Partners will meet on a monthly basis through the Alignment Group to discuss implementation and alignment efforts, and to address the progress and opportunities for improvement, which would include training opportunities for staff.

Maryland will leverage multiple avenues and access points to provide efficient and effective services and systems for customers. To help operationalize alignment efforts, DLLR, DHR, MSDE, and local workforce partners are committed to cross training employees and sharing resources and data, as appropriate and when possible. Collaboration between State and local workforce partners and the co-location of resources will further foster improved customer service, as it will help identify commonalities and ensure that processes are in place to provide a greater number of services to shared customers. The WIOA Partners will explore ways to successfully build in incentives for local providers to serve those who are most in need of assistance. The WIOA Partners are further committed to placing jobseekers in the center of service delivery solutions.

Maryland's WIOA Partners are committed to serving the following target populations, identified by the State as individuals with barriers to employment:

**Target Populations: Individuals with Barriers to Employment**

- Displaced Homemakers
- Eligible MSFWs
- Ex-offenders
- Homeless individuals
- Individuals facing substantial cultural barriers
- Individuals with disabilities, including youth with disabilities
- Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act
- Individuals who are English language learners
- Individuals who are unemployed, including the long-term unemployed
- Individuals who have low levels of literacy
- Individuals without a High School Diploma
- Low income individuals (including TANF and SNAP recipients)
- Long-term unemployed individuals
- Native Americans, Alaskan Natives, and Native Hawaiians
- Older individuals
- Single parents (including single pregnant women and non-custodial parents)
- Veterans
- Youth who are in or have aged out of the foster care system

Maryland is dedicated to continued discussions regarding the individual barriers noted on the above list, and is open to exploring whether additional barriers to employment should be included. Maryland allows for Local Areas to include specific additional barriers that the Local Areas may wish to include in their service delivery. These individuals face challenges that require the WIOA Partners to work together to coordinate services and to implement innovative strategies to meet their needs throughout the job acquisition, training, and business recruitment processes.

Maryland's WIOA system will:

- Incorporate continuous staff training, which is paramount to understanding and properly utilizing the tools available to facilitate assessment, to disseminate information on services available throughout the system, and to refer customers to appropriate WIOA partner organizations.
- Provide multiple access points to increase outreach and balance efficiency among the various persons involved with the customer experience.
- Create a robust menu of services and appropriate referrals that can effectively meet the needs of a diverse customer base.

- Establish relationships, competence, and accountability among all partners involved in the system. Through the Alignment Group, the WIOA Partners will establish deeper relationships and accountability to enhance the customers' experiences.
- Encourage sharing of information among partners, such as creating a resource map, workforce network blog, WIOA listserv, and a common customer service management system. The Alignment Group will provide guidance to the system.
- Encourage greater business involvement in workforce processes, in Workforce Development Boards, and in the sharing of "industry-related" work skills and behavioral expectations. This includes a greater collaborative role for community colleges and industry organizations in developing programs that meet labor market needs in the Local Area.
- Develop a common intake process that provides the ability to access customer information on services provided and next steps in the process.
- Reduce duplicative processes to expand staff's ability to serve customers more efficiently;
- Establish guidelines for WIOA Partners to manage and refer customers to other partners;
- Identify liaisons among the various partners to assure that customers experience a seamless flow and referral to appropriate services.
- Develop a mechanism for clear identification of resources and service responsibilities among the partners and within the community.
- Place people before performance by putting customers at the center of policy decisions regarding service delivery.

Maryland's WIOA system can be a pathway to the middle class and a means to maintain and build the skills necessary to remain in the middle class. Maryland is committed to ensuring its target populations are able to access the WIOA system on a priority basis. The State will ensure WIOA priority of service provisions are appropriately followed and monitored through several means. Within the WIOA local plans, Maryland will require Local Areas to provide details on how priority shall be given in the Local Area within the requisite parameters of the law and State policy. Additionally, Maryland's WIOA Memorandums of Understanding (MOUs) will ensure priority of service is effectively offered. Maryland policy requires that local WIOA MOUs contain provisions regarding a number of key components, including priority of service.

### *Supportive Services*

To fully address the wide range of barriers that WIOA participants may face, Maryland is committed to offering a diverse array of supportive services as appropriate. Supportive and wrap-around services will provide financial and other assistance to participants who would not be able to successfully participate otherwise. Using a systems approach, the WIOA Partners are committed to working together to ensure supportive service resources are leveraged effectively for jobseekers. By taking advantage of opportunities to braid funding streams within Maryland's WIOA system, participants may be supported with transportation assistance, suitable attire for work, tools, work or training equipment, child or dependent care, graduation fees, union fees, clothing for interviews or work, and more.

Maryland's WIOA Partners recognize that supportive service needs vary widely by participant and geography and, therefore, supportive services must be designed to assist in the removal of the specific barriers that individual participants face. The Jobseeker Advisory Focus Groups will be of critical importance to the WIOA System in meeting this goal, as it will provide a feedback mechanism from current and past customers. Relying on customer feedback to drive decision-making will help to ensure that supportive service funding is allocated in a way that truly meets customer needs.

Additionally, programs working with out-of-school youth ages 16-24 are strongly encouraged to work with Local Management Boards through the Governor's Office for Children to plan and implement supportive services that respond to the needs of youth in their respective jurisdictions. Local Management Boards are local government designees established in each of Maryland's 24 jurisdictions to ensure the coordinated implementation of a local inter-agency service delivery system for children, youth, and families. Local Management Boards are able to apply for flexible State funds from the Children's Cabinet to support programming that aligns with Governor Hogan's goal of ensuring economic opportunity for all. These flexible State funds may provide necessary supports that could not otherwise be provided with existing, less flexible federal dollars. It is envisioned that collaborative planning and implementation will prevent service duplication and ensure that State funds are used to fill gaps in services. Local plans must address how they will leverage and coordinate supportive services in service delivery.

*(a)(2)(D) - Coordination, Alignment and Provision of Services to Employers.* Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional AJC partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

As the most direct beneficiaries of a strong pipeline of skilled workers, Maryland businesses are a primary driver for, and consumer of, the State's workforce system. Recognizing the essential role businesses play in identifying in-demand occupations and guiding the development of relevant training, Maryland's workforce system partners proactively engage businesses early and often in the development of services, to ensure workforce solutions meet quality criteria and are responsive to employer needs. In addition to working with businesses to innovate new workforce solutions, the State's workforce system must also ensure businesses are benefitting from the wide array of existing professional development, support services, and incumbent worker resources available through Maryland's network of AJCs.

Two metrics are defined in the Benchmarks of Success for Maryland's workforce system to evaluate the performance of the State's WIOA partners in providing employers with coordinated, aligned services. At a strategic level, Maryland WIOA partners will track the increased earning capacity of Maryland's workforce system customers by maximizing access to employment. One of the benchmark measures is currently under development to support this strategic goal is to assess whether, and to what extent, the workforce system is successful in increasing the number of businesses formally engaged in the workforce system over time. Tying the two together, Maryland's workforce system's success will be measured, in part, by determining how effective

the system is in connecting employers with the talent they need, both in terms of the numbers of individuals hired and the frequency with which employers become return customers.

### *The GWDB*

The GWDB is Governor Hogan's chief policy-making body for Maryland's workforce development system, dedicated to promoting comprehensive planning and coordination of employment and training programs in the State. The GWDB advises the State's workforce system regarding strategies for conducting outreach to Maryland's businesses, effectively utilizing Labor Market Information, and developing innovative workforce development practices to meet training needs. In accordance with the key role businesses play and the specific board composition requirements of WIOA, the GWDB is comprised of a business-majority membership. Following the GWDB's model and per WIOA requirements, the State similarly requires Local Boards to develop business-majority Board memberships. Local Areas also must outline in their local WIOA plans how they intend to provide a greater business voice in local workforce services.

### *Maryland's Business Services Team*

The State's WIOA Partners work together to ensure Maryland businesses are provided with quality customer service through the Maryland Business Services Team, comprised of DLLR staff, local workforce staff, and other locally determined partners. The Business Services Team exists to help companies grow and thrive, to foster economic development and stability, and to ensure that Marylanders have opportunities for gainful employment. Together, the members of the Business Services Team partner with companies throughout the State to understand their unique needs and proactively assist them in creating effective workforce development strategies. A diverse coalition of organizations participate in business service activities:

- Maryland Department of Commerce;
- DHS;
- MSDE;
- Maryland Department of Disabilities;
- Local economic development agencies;
- Public libraries;
- Faith-based and community-based organizations;
- Chambers of Commerce;
- Industry associations; and
- Maryland businesses, colleges, and universities.

The Business Services Team strategically utilizes the resources and expertise of the above noted organizations to develop business solutions that meet employer workforce needs, supporting company stabilization and growth throughout the business life cycle.

To gain a deeper understanding of the services different partners contributing to business services have to contribute, the Business Services Team engages in frequent communication with all parties. The bank of shared knowledge this level of communication builds enables Business

Services Team members to refer businesses to the partner organizations best positioned to provide assistance. Recognizing that a workforce system disconnected from business lacks credibility and fails to meet the needs of jobseekers, the WIOA Partners are dedicated to creating an industry-driven solution to workforce development. Business partners are centrally involved in identifying workforce needs, developing curriculum, designing trainings, and placing successful participants. The full engagement of business in the process builds employer confidence that program participants are proficient in relevant skill sets.

#### *Employment Advancement Right Now (EARN) Maryland*

The EARN Maryland program, is a nationally recognized, State-funded competitive workforce development grant program that is industry-led, regional in focus, and a proven strategy for helping businesses cultivate the skilled workforce they need to compete. It is flexible and innovative, designed to ensure that Maryland employers have the talent they need to compete and grow in an ever-changing 21st century economy.

The goals of EARN Maryland are to:

- Address the demands of businesses by focusing intensively on the workforce needs of a specific industry sector over a sustained period.
- Address the needs of workers by creating formal career paths to good jobs, reducing barriers to employment, and sustaining or growing middle class jobs.
- Encourage mobility for Maryland's most hard-to-serve jobseekers through job readiness training, which may include GED® preparation, occupational skills development, literacy advancement, and transportation and childcare components.

EARN Maryland invests in strategic industry partnerships from key economic sectors in every region, coordinating educational, workforce and economic development initiatives to address the multiple needs of companies, starting with the training of skilled workers.

While traditional workforce programs often look to training entities or higher education to determine training needs and develop curriculum, EARN Maryland's innovative model asks business and industry partners to identify skills gaps and workforce training needs, as well as effective training strategies and techniques for identified skillsets. Essentially, the direct involvement of employers is required at every step in the process.

Because EARN targets services to individuals with barriers to employment, the provision of wrap around services are a crucial element in the model's success. Strategic Industry Partnerships who are awarded EARN grants must include at least two "diverse partners," often non-profit organizations or Local Boards with extensive experience in barrier removal. Training plans must describe how support services, including barrier removal services, will holistically meet participant needs.

**(a)(2)(E) Partner Engagement with Educational Institutions.** Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as

partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

Governor Hogan recognizes the value of Maryland's outstanding system of community colleges and career and technology education partners as key contributors in preparing a workforce aligned with the needs of Maryland businesses. Maryland has taken several important strategic actions to create a job-driven education and training system.

#### *Program Administration*

To support the fullest integration of these key educational resources in the State's workforce system, WIOA Title II adult education and literacy programming is operated within DLLR, along with WIOA Title I and Title III workforce system programming. Co-location of leadership promotes an ongoing dialogue that enhances the coordination and alignment of services of local adult education service providers, many of which are community colleges, and Local Areas are empowered to deliver effectively coordinated and aligned services.

#### *Prioritizing System Performance*

One of the issues WIOA seeks to address is the unfortunate siloing of programs. Siloing came about slowly, over decades, and was driven, at least in part, by the fact that different programs were striving to meet divergent performance metrics. Maryland's workforce system partners have taken a leadership role in promoting a new, higher level of system integration with the creation of the *Benchmarks of Success for Maryland's workforce system*. Using the Benchmarks as a framework, the State's WIOA partners are committed to measuring the effectiveness of educational partners as a systems component.

The second of the five strategic goals identified in the *Benchmarks* is to:

*"Increase earning capacity of Maryland's workforce system customers by maximizing access to and use of skills and credentialing."*

By measuring the State's performance in meeting the benchmarks for this goal, Maryland will gain the ability to look beyond performance metrics that may only tell part of the story. This information will empower Maryland's workforce system to re-align and adjust programs to create the effective services for shared customers that move more Marylanders into good jobs on career pathways.

In addition to the obvious benefits associated with improved alignment, assessing services at a systems level with new metrics designed for this specific purpose will provide the State with valuable information that can be leveraged when opportunities arise to apply for supplemental grants.

#### *Alignment of Assessments*

Maryland introduced a new universal assessment policy covering both WIOA Title I and Title II programs in 2016 that has dramatically improved the alignment and quality of the assessment process. Previously, the State's Title II program annually issued separate, comprehensive guidance on assessments in compliance with requirements of the United States Department of Education's Office of Career, Technical, and Adult Education (OCTAE).

By comparison, the State's Title I partners received minimal guidance that lacked substantive direction or quality standards. Moreover, neither the guidance issued separately for Title I or II included any requirement for local Title I and Title II partners to coordinate their assessment activities. This approach resulted in uneven quality of assessment administration by Title I staff. It also inadvertently produced over-testing of customers in Local Areas where Title I and II partners either used different assessment instruments, or, did not accept the results of assessments conducted by the other partner.

The new universal Maryland Basic Education Skills and English Language Assessments Policy<sup>xxvii</sup> maintains, but streamlines content aligned with OCTAE requirements, places uniform standards on the implementation of assessments across WIOA Title I and Title II programs, and requires all Local Areas to develop a coordinated assessment plan that is described in the local WIOA plan. Per OCTAE requirements, the policy will be submitted on an annual basis.

### *Career and Technology Education*

Though WIOA places a greater emphasis on serving out-of-school youth, Maryland's WIOA Partners remain committed to ensuring that clearly defined career pathways exists for in-school youth as well. The workforce system has a strong, enduring relationship with its Career and Technical Education (CTE) schools across the State. Many CTE administrators sit on Local Boards and are actively engaged in conversations with businesses and workforce providers to understand how high school programs can be improved to meet industry needs. Representatives from DLLR's DWDAL are currently meeting alongside MSDE and other key stakeholders to ensure ongoing alignment of Maryland's CTE system with in-demand careers. The group is further committed to placing a greater emphasis on CTE programming as an avenue of college and career readiness for all students.

### *Career Pathways*

Maryland has made significant progress in serving its pledge to establish a robust career pathways system in Maryland. The State continues to build on previously-implemented multi-year pilots of the Maryland Integrated Basic Education and Skills Training (MI-BEST) program and the Accelerating Connections to Employment (ACE) initiative.

In October of 2016, the State committed \$1,000,000 of WIOA Governor set-aside funds to invest in demonstration projects that support career pathway initiatives. The grant, which targets low-skilled jobseekers, including individuals with LEP and those with low reading, writing, and math skills who lack high school diplomas, is designed to drive greater co-enrollment between WIOA Title I and Title II programming.

The State will continue to support the success of career pathways implementations with technical assistance, clear guidance, and innovative funding mechanisms: businesses and jobseekers will be tapped to align the needs of employers with talent development activities; and the system of on-ramps and off-ramps for specific career pathways will be analyzed and refined on an ongoing basis to optimize the effectiveness of the model in helping job seekers not only find their first job, but continue to develop as professionals in satisfying careers that open the door to economic self-sufficiency. And to promote the implementation of career pathways at the local level, the State requires local workforce partners to address in their local plans how they intend to implement a career pathways model to address their local workforce training needs.

#### *EARN Maryland*

The State's EARN Maryland initiative has been recognized as a national best practice for its innovation and implementation of sector strategies, earning praise from the National Skills Coalition and Urban Institute for a program design that requires close collaboration between the educational and industry sector partners for which participants receive training. The tightness of alignment ensures participants are prepared with highly competitive skill sets that make them strong competitors in the job market.

As of October 2017, 2,767 unemployed and underemployed participants completed entry level training programs through the EARN program. Of those, 2,323 (84 percent) obtained employment, and over 4,400 incumbent workers participated in training, earning a new skill, certification or credential. Recognizing the success of the program, Governor Hogan has continued to invest in EARN through appropriations in the FY 2018 budget to promote cybersecurity, information technology, and green jobs training, to ensure Maryland employers will continue to have this valuable resource to develop the talent they need to compete and grow in key industries.

(F) *Partner Engagement with Other Education and Training Providers.* Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

Training without the close involvement of industry and business, training provided by workforce development providers will likely be to no avail. Maryland has embraced employer and industry driven models to training through the Employment Advancement Right Now (EARN) Maryland program and through the State's investments in Registered Apprenticeships.

#### *EARN Maryland*

EARN Maryland is the State's nationally-recognized workforce program. The program is industry-led, designed to address business workforce needs by focusing on industry sector strategies that produce long-term solutions to sustained skills gaps and personnel shortages. The success of the program is seeded in collaboration among a diverse group of partners, including employer and industry partners, non-profit and community-based organizations, and workforce, economic development, and education partners. Based upon employer-identified training needs, Strategic Industry Partnerships provide education and skills training to unemployed and

underemployed Marylanders, including support for individuals with specific barriers to employment. EARN also provides career advancement strategies for incumbent workers.

Since the program began in 2014, EARN has been recognized as a national best practice for its innovation and implementation of sector strategies. In 2015 and 2016, the National Skills Coalition and Urban Institute praised EARN as a leader in industry-led workforce initiatives. In 2017, EARN was highlighted at the National Conference for State Legislatures as a model to be emulated. Additionally, at the request of the National Skills Coalition, EARN Maryland staff provided technical assistance to states seeking to emulate this national best practice.

As of October 2017, over 4,400 incumbent workers have participated in training, earning a new skill, certification or credential. Employer partners identify many benefits to their employees participating in EARN training, including increased cost savings, productivity and retention.

Recognizing the success of the program, Governor Hogan invested in EARN through appropriations in the Fiscal Year 2018 budget to ensure Maryland employers have the talent they need to compete and grow in key industries. Specifically, \$3 million was earmarked to be invested to promote training in Cyber and Information Technology. Over the next three years, \$1 million annually for green jobs training. These investments by Governor Hogan have doubled the program budget for FY18 and will allow a larger number of employers to benefit from this industry-driven program.

Due to the critical role of employer and industry partners in the implementation of the program, EARN partnerships are encouraged to grow their employer network. As of October 2017, over 850 employers have participated in the program. This represents a 24% increase over last year. In 2017, the Business Economic and Community Outreach Network (BEACON) performed a survey to ascertain the effectiveness of the program from the perspective of EARN employer and industry partners. When asked to rate the competitive advantage of EARN participants, nearly 71% of survey respondents stated that they have a significant competitive advantage over their peers, with 28% responding that EARN participants have at least some competitive advantage. Over 99% of respondents expressed that their participation in EARN is worth the investment. Finally, nearly 99% of employers expressed that their participation in EARN has had a positive impact on their business. To this specific question, respondents cited that the program has helped their business to increase efficiency and effectiveness in meeting the mission and goals of the organization, expand and increase the diversity of the talent pool from which they hire, and increase exposure in the community and to candidates. The results of this survey solidify the impact of the industry-led model in improving business outcomes and best serving Maryland's workforce.

In 2017, the Department continued its partnership with the Maryland Department of Human Services' Food Supplement Employment Training (FSET) Program. Funded by the United States Department of Agriculture, the program connects people who receive monthly food supplement benefits (SNAP, food stamps) to job-driven training programs. The program requires a cost-match with non-federal funding. Participating programs will be reimbursed up to 50% of allowable program costs, thus increasing the State and other nonfederal funders' investment and increasing the number of Marylanders to receive in-demand skills training. Because EARN is a state-funded program, EARN Maryland partnerships have the means to provide the cost match. Four EARN grantees have taken advantage of the program, including the Jane Addams Resource

Corporation, Civic Works, Humanim and the Job Opportunities Task Force. DHS has reported that \$500,000 in FSET funds are being utilized as a match for EARN Maryland partnerships.

On October 26, 2017, the State Workforce System released Policy Issuance 2017-09: WIOA Title I Training & Maryland's Eligible Training Provider List. The policy was the result of over a year's worth of convening stakeholders, public comment, and technical assistance. Both EARN partnerships and Registered Apprenticeships were represented in the discussions and policy formulation. Previously, EARN partnerships had not been included on the ETPL. Based on the feedback from EARN partnerships, community colleges, and others, the State established a process that would allow EARN Maryland performance outcome reports to count as past performance data submitted for initial eligibility. It is the State's hope that as the new policy is implemented, more EARN partnerships will be able to take advantage of this additional funding stream, and, more importantly, WIOA customers would be trained in in-demand occupations leading toward employment opportunities.

### *Registered Apprenticeship*

Since becoming a part of the Division of Workforce Development and Adult Learning in 2016, the Office of Apprenticeship and Training has made a concerted effort to utilize this time-tested model as the State's premiere workforce solution. The structure of Registered Apprenticeship is flexible and innovative, allowing for businesses to create a structured training model to connect highly skilled workers to the employer. The Apprentices benefit through the On-the-Job Training, which allows them to earn an income while they learn the skills needed for the job.

Leveraging federal funding for the acceleration and expansion of apprenticeship opportunities, the State hired additional staff charged with building partnerships with new, existing and inactive sponsors and/or businesses. Industry engagement and participation are also key to the successful expansion of Registered Apprenticeship in Maryland. Outreach to chambers of commerce and industry associations, and State and Local Workforce Development Boards are occurring. The connections with these industry groups nurtured several opportunities to engage industry to develop multi-employer programs and program templates. Lastly, relationships are being leveraged with sector partnerships through EARN.

In January 2017, there were no Registered Apprenticeship sponsors on the State's Eligible Training Provider List (ETPL). Due to the effort of the Office of Apprenticeship and Training, and as a result of intensive outreach, over 30 joined the ETPL to leverage WIOA funding.

### **III. OPERATIONAL PLANNING ELEMENTS**

(a)(2)(E) *Partner Engagement with Educational Institutions.* Describe how the State's Strategies will engage the State's community colleges and area career and technical education schools, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv).

Governor Hogan recognizes the value of Maryland's outstanding system of community colleges and career and technology education partners as key contributors in preparing a workforce aligned with the needs of Maryland businesses. Maryland has taken several important strategic actions to create a job-driven education and training system.

#### *Program Administration*

To support the fullest integration of these key educational resources in the State's workforce system, WIOA Title II adult education and literacy programming is operated within DLLR, along with WIOA Title I and Title III workforce system programming. Co-location of leadership promotes an ongoing dialogue that enhances the coordination and alignment of services of local adult education service providers, many of which are community colleges, and local workforce areas are empowered to deliver effectively coordinated and aligned services.

#### *Prioritizing System Performance*

One of the issues WIOA seeks to address is the unfortunate siloing of programs that slowly isolated programs from one another over decades. Siloing was driven, at least in part, by the fact that different programs were striving to meet divergent performance metrics that, at best, were not fully aligned. Maryland's workforce system partners have taken a leadership role in eliminating unnecessary silos with the creation of the *Benchmarks of Success for Maryland's Workforce System*. To underscore the essential role community colleges and career and technical education schools play in preparing a skilled workforce, the State's workforce system partners are committed to measuring the effectiveness of educational partners as a systems component. The second of the five strategic goals identified in the *Benchmarks* is to:

*"Increase earning capacity of Maryland's workforce system customers by maximizing access to and use of skills and credentialing."*

By measuring the State's performance in meeting the benchmarks for this goal, Maryland will gain the ability to look beyond performance metrics that may only tell part of the story. This information will empower Maryland's workforce system to re-align and adjust programs to create the effective services for shared customers that move more Marylanders into good jobs on career pathways.

It also provides the State with an opportunity to apply for supplemental grants together, and it allows for more easily identifiable alignment opportunities.

### *Alignment of Assessments*

Maryland introduced a new universal assessment policy covering both WIOA Title I and Title II programs in 2016 that has dramatically improved the alignment and quality of the assessment process. Previously, the State's Title II program annually issued separate, comprehensive guidance on assessments in compliance with requirements of the United States Department of Education's Office of Career, Technical, and Adult Education (OCTAE). By comparison, the State's Title I partners received minimal guidance that lacked substantive direction or quality standards. Moreover, neither the guidance issued separately for Title I or II included any requirement for local Title I and Title II partners to coordinate their assessment activities. This approach resulted in uneven quality of assessment administration by Title I staff. It also inadvertently produced over-testing of customers in local areas where Title I and II partners either used different assessment instruments, or, did not accept the results of assessments conducted by the other partner.

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### *Career and Technology Education*

Though WIOA places a greater emphasis on serving out-of-school youth, Maryland's WIOA Partners remain committed to ensuring that clearly defined career pathways exists for in-school youth as well. The workforce system has a strong, enduring relationship with its Career and Technical Education (CTE) schools across the State. Many CTE administrators sit on Local Workforce Boards and are actively engaged in conversations with businesses and workforce providers to understand how high school programs can be improved to meet industry needs. Representatives from DLLR's Division of Workforce Development and Adult Learning are currently meeting alongside MSDE and other key stakeholders to ensure ongoing alignment of Maryland's CTE system with in-demand careers. The group is further committed to placing a greater emphasis on CTE programming as an avenue of college and career readiness for all students.

### *Career Pathways*

Maryland has made significant progress in serving its pledge to establish a robust career pathways system in Maryland. The State continues to build on previously-implemented multi-year pilots of the Maryland Integrated Basic Education and Skills Training (MI-BEST) program and the Accelerating Connections to Employment (ACE) initiative.

In October of 2016, the State committed \$1,000,000 of WIOA Governor set-aside funds to invest in demonstration projects that support career pathway initiatives. The grant, which targets low-skilled jobseekers, including individuals with limited English proficiency and those with low reading, writing, and math skills who lack high school diplomas, is designed to drive greater co-enrollment between WIOA Title I and Title II programming.

The Seedco initiative, also mentioned in other sections of this plan, will establish the West Baltimore Career Pathways Collaborative to (1) prepare participants for career pathways in local demand sectors by providing access to training, education, job placement, and career development services; (2) address basic needs and life issues that are barriers for success; and (3) place participants in long-term, well-paying jobs. The program targets services to ex-offenders. The State will continue to support the success of career pathways implementations with technical assistance, clear guidance, and innovative funding mechanisms: businesses and jobseekers will be tapped to align the needs of employers with talent development activities; and the system of on-ramps and off-ramps for specific career pathways will be analyzed and refined on an ongoing basis to optimize the effectiveness of the model in helping job seekers not only find their first job, but continue to develop as professionals in satisfying careers that open the door to economic self-sufficiency. And to promote the implementation of career pathways at the local level, the State requires local workforce partners to address in their local plans how they intend to implement a career pathways model to address their local workforce training needs.

### *EARN Maryland*

The State's EARN Maryland initiative has been recognized as a national best practice for its innovation and implementation of sector strategies, earning praise from the National Skills Coalition and Urban Institute for a program design that requires close collaboration between the educational and industry sector partners for which participants receive training. The tightness of alignment ensures participants are prepared with highly competitive skill sets that make them strong competitors in the job market.

As of October 2017, 2,767 unemployed and underemployed participants completed entry level training programs through the EARN program. Of those, 2,323 (84%) obtained employment, and over 4,400 incumbent workers participated in training, earning a new skill, certification or credential. Recognizing the success of the program, Governor Hogan has continued to invest in EARN through appropriations in the Fiscal Year 2018 budget to promote cybersecurity, information technology, and green jobs training, to ensure Maryland employers will continue to have this valuable resource to develop the talent they need to compete and grow in key industries.

**(a)(2)(G) Leveraging Resources to Increase Educational Access.** Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

Maryland will continue to leverage and coordinate Federal, State and local investments to enhance access to workforce development programs. Active examples of such activities include:

#### *EARN Maryland*

EARN Maryland leverages state funds to offer a competitive grant program to support workforce programs that are industry-led and regional in focus. EARN Maryland is comprised of Strategic Industry Partnerships (SIPs) that represent a variety of industries, including healthcare, manufacturing, construction, and biotechnology. An educational partner is a requirement of the grant, creating an important avenue to post-secondary education and training resources.

#### *Career Pathways*

Maryland continues to build on previously-implemented multi-year pilots of the Maryland Integrated Basic Education and Skills Training (MI-BEST) program and the Accelerating Connections to Employment (ACE) initiative to drive and strengthen career pathways. In October of 2016, the State committed \$1,000,000 of WIOA Governor set-aside funds to invest in demonstration projects that support career pathway initiatives. The grant, which targets low-skilled jobseekers, including individuals with LEP and those with low reading, writing, and math skills who lack high school diplomas, is designed to drive greater co-enrollment between WIOA Title I and Title II programming.

In another example of Maryland's efforts to integrate Career Pathways programming, Seedco and Bon Secours Community Works will serve as the new RExO provider, offering the West Baltimore Career Pathways Collaborative. A variety of partners and resources will be leveraged to deliver this program, including:

- DPSCS
- Baltimore Workforce Development Board
- Baltimore Mayor's Office of Human Services
- Reentry Division
- John Hopkins Hospital
- Whiting Turner Contracting
- University of Maryland, Baltimore City Community College
- Baltimore Alliance for Careers in Health Care
- Job Opportunities Task Force
- Jane Addams Resource Corporation
- Maryland New Directions

The Collaborative is designed to (1) prepare participants for career pathways in local demand sectors by providing access to training, education, job placement, and career development services; (2) address basic needs and life issues that are barriers for success; and (3) place

participants in long-term, well-paying jobs. This training-to-work adult reentry project will be delivered in Baltimore City and West Baltimore within Baltimore County. Seedco/Bon Secours will focus on the demand sectors and career pathways of: (1) Healthcare/Social Assistance, (2) Transportation/Warehousing/Logistics, (3) Manufacturing/Advanced Manufacturing, and (4) Construction

The program model will include cognitive behavioral therapy, mentoring, comprehensive assessments, adult basic education, GED prep, vocational training that leads to industry-recognized credentials, workforce activities that lead to employment, online computer skills training, financial literacy training, job search training, the development of Individual Case Plans, and follow-up services. The program will empower ex-offenders to enter into and retain employment in in-demand occupations and industries.

### *Registered Apprenticeships*

In 2016, the USDOL awarded Maryland \$2.2 million for the acceleration and expansion of RA opportunities in the State. Both the ApprenticeshipUSA Accelerator Grant and the ApprenticeshipUSA State Expansion Grant invest in the State's RA programming. In the case of the Expansion grant, the State included Letters of Support from all 16 of the State's community colleges, including some that joined specifically to participate as partners to the grant.

DLLR established an "Apprenticeship Innovation Fund" to invest in programs that support and enhance RA expansion strategies, particularly for vulnerable populations, youth, and dislocated workers. Through this fund the Department dedicated \$621,000 in early 2017 to award competitive grants to applicants, so they may implement new and promising ideas or adapt proven strategies, at the system or service delivery level, to expand the reach of RA programs in Maryland. In April 2017, the State announced the first four recipients of funding from the Apprenticeship Innovation Fund.

(a)(2)(H) *Improving Access to Postsecondary Credentials.* Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including RA certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

Maryland has established a strong record of implementing best practices related to improving access to education and industry-recognized credentials. The State continues to actively invest in a variety of initiatives that will drive the excellence of Maryland's workforce today and well into the future. Going forward, Maryland's workforce system partners will use the Benchmarks of Success for Maryland's workforce system to assess their effectiveness in working together to expand access to activities leading to industry-recognized postsecondary credentials. The Benchmarks include the strategic goal of "increasing earning capacity of Maryland's workforce system customers by maximizing access to and use of skills and credentialing."

The State's workforce system partners will track four benchmark measures to assess progress towards achieving this goal:

1. Increase the annual percent of Maryland's workforce system customers who obtain an industry recognized credential from X percent to Y percent by date.
2. Increase the annual percent of Maryland's workforce system customers who increase in their Educational Functioning Level.
3. Increase the annual percent of Maryland's workforce system customers who earn a High School Diploma.
4. Increase the annual percent of Maryland's workforce system customers who obtain an occupational skills training completion from X percent to Y percent by date.

These benchmarks will enable Maryland's workforce system to make data-driven adjustments, where necessary, to maintain a responsive system that meets job seekers where they are and prepares them with the in-demand skills Maryland's employers need.

#### *MI-BEST and ACE*

Maryland has implemented two important programs structured around the concepts of team teaching and contextualized learning that have provided a solid foundation for the State's strong career pathways program offerings. With leadership from the Office of Adult Education and Literacy Services within DLLR's DWDAL, Maryland piloted the Maryland Integrated Basic Education and Skills Training (MI-BEST) program with six community colleges located around the State. The pilot was implemented at six Maryland community colleges through a public-private partnership that included DLLR, the Annie E. Casey Foundation, and Local Boards. MI-BEST provided accelerated, integrated learning opportunities for low-skilled jobseekers, including individuals with LEP and those with low reading, writing, and math skills.

Carrying forward principles and lessons-learned from the MI-BEST model, Maryland participated in the multi-state Accelerating Connections to Employment (ACE) initiative. The Accelerating Connections to Employment (ACE) program was a multi-million dollar USDOL evaluation grant designed to build on the success of the MI-BEST model and more fully quantify the model's effectiveness that ended in 2016. The ACE program served ten Maryland jurisdictions, targeting the same populations served through the MI-BEST implementation. In addition to the suite of services included with the previous MI-BEST implementation, ACE incorporated a menu of enhancements, including internships, clinical placements, job placement support, and long-term career navigation.

#### *Registered Apprenticeships*

Governor Hogan's strategic vision for the workforce system, as outlined in the State's Combined State Workforce Plan, is to provide businesses with the skilled workforce they need to compete in the global, regional, and local economies. A bedrock strategy within that vision is the expansion of RA opportunities. The State's goal is to align RAs with the Maryland's workforce system to ensure that traditional RA expand alongside the creation of new opportunities grounded in labor market demand. Specifically, Maryland's Combined State Workforce Plan notes, "[by] aligning apprenticeships with the WIOA system, Maryland will ensure traditional apprenticeship opportunities that are grounded in market demand."

Maryland's Apprenticeship and Training Program registers three types of apprenticeships: time-based, competency-based, and hybrid models. Competency-based apprenticeships programs are a new addition to Maryland's menu, introduced into State regulation in 2017. By expanding the menu of apprenticeship models, Maryland has created new opportunities for employers and prospective apprentices seeking alternatives to a time-based apprenticeship.

A key issue in creating greater access to apprenticeship opportunities is the need to reach more people with information on their availability, diversity, and benefits. The State received a \$200,000 ApprenticeshipsUSA Accelerator grant from USDOL in 2016 to accelerate State-wide growth in apprenticeships through greater outreach efforts. These funds were used to cover professional development activities, assist in branding RA opportunities within the State, and convene promotional events targeting veterans and high school students in Career and Technology Education programs.

Maryland is also directing a significant portion of a \$1.5 million ApprenticeshipUSA Expansion grant awarded in late 2016 to fund five new Apprenticeship Navigators. A primary area of focus for the Apprenticeship Navigator role is to conduct outreach to the business community, existing sponsors, inactive sponsors, and other potential stakeholder groups. These outreach activities have resulted in the registration of fifteen new sponsors and the reactivation of seven Sponsors in 2017 alone.

An additional component of the State's ApprenticeshipUSA Expansion Grant is a Capbreaker Award, designed to institute a pilot program aimed at mitigating the hiring challenges found within the healthcare industry. The pilot program draws on an untapped resource, internationally trained skilled immigrants, who call Maryland home. The Baltimore Alliance for Careers in Healthcare (BACH), the entity, which will serve as the RA sponsor for the pilot initiative, includes Baltimore area hospitals such as Johns Hopkins Hospital. BACH obtained approval from the Maryland Apprenticeship and Training Council to employ a competency based model in May 2017.

Maryland established an "Apprenticeship Innovation Fund" to invest in programs that support and enhance RA expansion strategies, particularly for vulnerable populations, youth, and dislocated workers. Through this fund, DLLR dedicated \$621,000 in early 2017 to award competitive grants to support new and promising ideas or adapt proven strategies at the system or service delivery level, to expand the reach of RA programs in Maryland. In April 2017, the State announced the first four recipients of funding from the Apprenticeship Innovation Fund.

#### *Competitive Grant Proposal (CGP) for Local Areas for Demonstration Projects in Career Pathways and Co-Enrollment of WIOA Title II Students into Title I Programs*

The Career Pathways model has been widely adopted as a systems-based approach to career development. Multiple on and off-ramps allow for ongoing, incremental career advancement tied to the acquisition of work experience coupled with portable and stackable credentials. In late 2017, Maryland committed \$1,000,000 of WIOA Governor set-aside funds to invest in demonstration projects that support career pathway initiatives. Individuals lacking high school diplomas are the target population for the grant, designed to drive greater co-enrollment between WIOA Title I and Title II programming.

### *Eligible Training Provider List (ETPL)*

To expand the number and diversity of high-quality training providers on the ETPL, the State conducted a highly collaborative process to develop a new ETPL policy and processes. The new WIOA Title I Training & Maryland's Eligible Training Provider List policy,<sup>xxix</sup> issued in 2017, was designed to encourage the participation of the education and training institutions that play such a pivotal role in building a highly qualified workforce. Early outcomes of the new policy indicate the inclusive development process was successful in communicating the value of the list to stakeholders. Applications from community colleges have seen a sharp increase, and in the short period of time the new policy has been in force, the 34 new apprenticeship programs have been added.

*(a)(2)(I) Coordinating with Economic Development Strategies. Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.*

#### *Coordinating with Commerce*

Recognizing that greater collaboration between agencies may require the use of common platforms, data collection and information sharing, Maryland is actively working with representatives from Maryland's Commerce Department to align processes and leverage each agency's core strengths in a more coordinated way. Maryland's Business Services members attend quarterly training on business retention, growth and layoff aversion strategies, as well as economic and industry indicators and Labor Market Information. Additionally, representatives from DLLR and Commerce will continue discussions to allow for greater coordination of services, including but not limited to access to Commerce's current business services platform.

Furthermore, joint investment in incumbent worker training programs support employer strategies for upgrading the skills of currently employed workers. Incumbent worker training programs invest not only in the employee who obtains transferable skills and industry-recognized credentials, but also supports the competitiveness of Maryland's businesses by ensuring that their incumbent employees can effectively adapt to meet continually advancing technologies. Additionally, these programs typically support business retention and expansion efforts. They do so not by developing basic skill levels in occupations with growing demand, a primary focus of Maryland's EARN program, but by supporting company efforts to update skills for new processes and equipment.

Both DLLR and the Commerce Department have previously invested in matching grant programs directed to businesses. These investments in Maryland's businesses provided customized training solutions for individual companies with unique or proprietary technical skill requirements. Under WIOA, incumbent worker training can be used to help avert potential layoffs of employees, or to increase the skill levels of employees. DLLR and Commerce will continue to work collaboratively to find ways to renew efforts to increase incumbent worker training funds, and will jointly market the availability of these training funds to ensure Maryland's businesses are competitive and their employees are well-trained to compete in a global marketplace.

**(b) State Operating Systems and Policies.** The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section II **Strategic Elements**. This includes—

(1) The State operating systems that will support the implementation of the State's strategies. This must include a description of—

(A) State operating systems that support coordinated implementation of State strategies (e.g., Labor Market Information systems, data systems, communication systems, case-management systems, job banks, etc.).

Maryland is committed to moving towards an integrated systems approach, in which its separate legacy data systems will be replaced gradually. While the Department of Labor, Licensing and Regulation (DLLR), Maryland State Department of Education Division of Rehabilitation Services (DORS), and Department of Human Services (DHS) are capable of reporting on each individual WIOA program to the respective federal oversight agencies, Maryland does not currently have an integrated system that is accessible to all partner programs. DLLR is therefore currently unable to access data from agencies, like DORS and DHS, which collect data outside of the Maryland Workforce Exchange (MWE) system, and agencies may have limited knowledge of how partner programs are serving mutual customers.

The MWE serves as the data system for a number of WIOA programs: the WIOA Title I Adult, Dislocated Worker, and Youth programs; WIOA Title III Wagner-Peyser employment services, Jobs for Veterans State Grant Program, and the Trade Adjustment Assistance for Workers Program. However, Temporary Assistance for Needy Families (TANF), Vocational Rehabilitation, and Adult Education do not currently house data in the MWE. Due to contract end dates in 2019 and 2020, as shown in the chart below, the WIOA leadership team recognizes that Maryland needs both short- and long-term solutions and goals to data sharing and alignment.

In 2017, DHS was awarded over \$195 million in federal funding to build a groundbreaking technology platform that will transform the state's ability to deliver vital human services to Marylanders. Maryland's Total Human-services Information Network, or MD THINK, is a cloud-based data repository that will break down traditional silos and data barriers between state agencies and provide integrated access to programs administered by agencies including DHS, the Department of Health, the Department of Juvenile Services, and DLLR. MD THINK is the product of two years of work by DHS and other agencies to develop an innovative design and project plan to modernize the state's human services technology infrastructure and customer service process. MD THINK's use of a cloud-based platform is expected to deliver significant cost savings, streamline program operations, and increase agency productivity. Most importantly, enhanced data analytics will better enable state agencies to deliver the highest levels of service to Marylanders. The first phase of the nearly \$200 million revamping of the current system will focus on helping streamline and enhance service delivery to children and families. Data management and data analytics are key elements that better enable the bundling and delivery of services especially for the TANF/WIOA alignment and Two-Generation approach being piloted in Maryland to combat multi-generational poverty.

In the short-term, the WIOA leadership team has identified a number of key steps to take while the MD THINK system is in development. Granting WIOA partner agencies "read only" basic

access, with the appropriate releases, is one key shorter-term, achievable step towards system alignment. On December 18, 2017, the WIOA partners issued Policy Issuance 2017-10: Partner Access to the Maryland Workforce Exchange. The policy allows for read-only access to the MWE be granted to WIOA partners. Expanding partner access to the MWE system to a read-only level requires a team approach, where agencies must triage clients in order to properly enroll them and provide the most appropriate services. The proper memoranda of understanding has been executed between partners and confidentiality statements for individual users outline responsibilities to maintain confidentiality and to protect personally identifiable information.

In short, while many of the State's WIOA programs use the MWE for the processes previously described, several of the State's WIOA programs operate in a different data system. At times, this can challenge the ability to easily share information on mutual customers. Recognizing this challenge, in the interim, Maryland is committed to establishing data sharing agreements in the absence of one common State system. Maryland is also committed to exploring common platform methods that will help us to improve system coordination.

**(B) Data-collection and reporting processes used for all programs and activities, including those present in AJC centers<sup>10</sup>.**

*The Maryland Workforce Exchange (MWE)*

The MWE is the State's online operating system that is the foundation, support, and common link aligning Maryland's workforce system to include Labor Market Information, data systems, and communications systems.

The MWE is utilized to manage and validate operational activities, via an internet-accessible participant reporting and data collection system that all DLLR and Local Area case managers use to report, collect, verify, and manage participant data from each of the local and regional teams. The system's case management capabilities allow staff to determine program eligibility, track services, and report results to federal funding sources. MWE is the official data source for all performance and program management data for all WIOA workforce programs. The State has directed considerable funds and resources in this system's development to ensure that performance measure calculations are consistent with current federal reporting requirements as specified by USDOL.

*LACES System*

DLLR has adopted the online LACES (Literacy, Adult and Community Education System), developed by LiteracyPro Systems to collect and report performance data from adult education providers. The system was designed specifically to report to the National Reporting System for Adult Education (NRS), as required by all states receiving WIOA Title II funding. LACES is currently utilized by approximately one-third of the states to report to NRS. In addition to meeting the requirements for federal reporting, LACES offers adult education providers a tool to manage student demographic, assessment, and progress data. Data may be exported from LACES or imported from partner programs to provide integrated reporting.

### *AWARE System*

DORS utilizes the AWARE VR case management system, a product from Alliance Enterprises. AWARE is a web-based, comprehensive, statewide database of participants, employers, staff, and vendors. The AWARE system is also used by the majority of the VR agencies throughout the nation. AWARE provides DORS with a comprehensive set of modules and tools grouped by general function. Case, Financial, and Organizational modules are each available from the Main Menu. DORS staff can access the modules for which they have been granted the security to do so. The features and procedures in AWARE are consistent and standardized throughout all modules, providing easy navigation and task completion throughout the system. Individual modules are based on VR business practices and Federal requirements. Alliance Enterprises is required by contract to ensure that AWARE VR remains current with all federal reporting requirements. AWARE enables all DORS staff to execute their required tasks, and collect and access all data and reports required to do their case management work and monitor performance. AWARE supports the two primary federal case types that DORS provides – VR and Independent Living Older Blind. In addition, AWARE allows DORS to set up “custom” case types for special programs, such as the new Pre-Employment Transitioning Services. Finally, AWARE has been customized to meet DORS’ need to batch transmit client authorizations (POs) directly into the State’s FMIS. This allows DORS to integrate client tracking and the vendor payment system into one single system, thus eliminating the duplication of effort.

### *WORKS System*

#### *WORKS System*

The Maryland DHS’ WORKS system is an online management information system that tracks work activity for a number of human service programs, including TANF. The system is used to collect and report data for federal reporting requirements and to provide both DHR and its local social service departments with information to help monitor results of work programs. WORKS ensures compliance and interfaces with a number of other DHR systems.

### *Performance Accountability System and Related Performance Issues*

Performance measures are a regular component of technical assistance and training activities throughout the year. In addition to specific performance measure training conferences held as needed, staff participate in roundtables and provide locally customized training upon request. State and local workforce development staffs receive quarterly performance reports and data that help them to monitor and continuously improve their participant reporting and performance outcomes. In addition to locally customized reports that coincide with the USDOL’s quarterly performance reporting formats, DLLR computes PY-to-date performance outcomes so that Local Boards can monitor their progress toward meeting negotiated performance goals. DLLR staff work closely with the local and regional teams to monitor and enhance performance throughout the year. Regularly scheduled training sessions will be held to provide the local and regional teams with basic and specific training on performance indicators, data entry, and data element validation. DLLR is also committed to providing bi-annual performance reports, fiscal and other pertinent information regarding workforce programming to both Local Board chairs and chief local elected officials to ensure that both are well-informed of the workforce activities in their

respective Local Areas. DORS also monitors performance on an ongoing basis. DORS staff have access to AWARE VR standardized performance reports on an ongoing basis - weekly, monthly, quarterly, and annual reports. Performance is monitored regularly to ensure progress toward the achievement of performance goals. Additionally, Alliance Enterprises has been working with DORS and other VR agencies to develop new data reporting elements in accordance with WIOA common performance measures. As Alliance Enterprises updates AWARE, DORS will ensure that staff are provided necessary training. Also, DORS staff will continue to work with its workforce partners toward implementing WIOA common performance measures. Currently, the MWE has the capability to request that the customer participate in a customer service survey outlining his or her experience in obtaining services. Moving forward, the WIOA Partners are dedicated to establishing a common customer service survey to ensure that common measures of customer satisfaction are captured.

(2) The State policies that will support the implementation of the State's strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, describe the State's process for developing guidelines for State-administered AJC partner programs' contributions to a AJC delivery system, including benchmarks, and its guidance to assist local boards, chief elected officials, and local AJC partners in determining equitable and stable methods of funding infrastructure in accordance with sec. 121(h)(1)(B). Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, the State must also include such guidelines.

### WIOA Policy Work

The GWDB sets forth public policy guidance for the workforce system. This includes, but is not limited to, the promotion of sector strategies and the development and growth of industry-led partnerships for workforce training delivery. The GWDB plays the critical role of finding ways to promote Maryland's workforce system to businesses and jobseekers alike. GWDB also provides needed insight into the needs of Maryland's businesses and will be apprised of operational policy needs.

Maryland is committed to a collaborative approach to operational policy making and will continue to encourage participation from State and local partners across the WIOA spectrum. The WIOA Partners will develop WIOA policies using DLLR's eight step process for policy development (<http://www.dllr.state.md.us/employment/mpi/>):

#### Maryland's 8-Step Process for WIOA Policy Development

1. Determine policy need
2. Policy Session with Subject Matter Experts
3. Policy drafting
4. Review & Comment Period
5. Updates to draft
6. Final approvals

7. Policy dissemination
8. Policy modification (when applicable)

The WIOA Partners have a robust and collaborative operational policy plan in place to guide the state's workforce system. Maryland is committed to implementing WIOA with a true systems approach, and therefore, DLLR, DORS, and DHR are committed to jointly issuing policies, memos, and guidance documents for the WIOA system, in line with the direction of the GWDB, and as appropriate. Jointly issuing operational policies is Maryland's way of ensuring all staff and system partners, regardless of which agency or organization they represent, will have the same expectations, training, and understanding of how to interact with customers and each other.

By taking a collaborative, thoughtful approach, which allows for subject matter experts across the system to weigh in, the WIOA Policy Work Group, in coordination with the WIOA Alignment Group and the GWDB, successfully works to provide policy guidance on a variety of topics that are key to WIOA implementation. The USDOL has touted Maryland's approach to policymaking as a national best practice and Maryland often provides technical assistance on the development of policies to other states via webinars and other means.

All of Maryland's policy guidance is provided on DLLR's website to ensure ease of access for staff and the general public, alike (<http://www.dllr.state.md.us/employment/mpi/>). To help identify specific WIOA policy needs, the WIOA Policy Work Group began by soliciting feedback in Spring 2015 from the State's other WIOA Workgroups to ensure policy needs were documented and subject matter experts from relevant State and local organizations were appropriately identified and engaged. Additionally, DLLR reviewed its existing policies and identified areas that could benefit from improvement and/or alignment with other WIOA programs.

The WIOA Policy Work Group, in consultation with the other WIOA Work Groups, have thus identified a variety of policy needs and work is underway to fully develop strong policies that align with the State Plan's vision. The Policy Work Group has strategically solicited the expertise of a wide-range of subject matter experts, ranging from directors to front-line staff, which represent many different organizations and will continue to work systematically to issue policy guidance as necessary for effective and efficient system operations.

These collaborative, comprehensive policy efforts build on and leverage state policies that promote a systems approach to implementing WIOA. Maryland will continue to build partnerships that will ensure the development of effective policies to support the State's strategies.

**(3) State Program and state Board Overview.**

**(A) State Agency Organization.** Describe the organization and delivery systems at the state and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

Three Maryland State agencies are responsible for administration and oversight of the WIOA System: 1. Maryland DLLR – DWDAL and DUI; 2. MSDE – DORS; and 3. Maryland DHS –

FIA. The following section details both the state and local organization and delivery systems for the Maryland's WIOA programs.

Appendix B provides organizational charts to supplement this explanation.

#### *DLLR – DWDAL*

Administration of the majority of the programs set forth in this Combined State Workforce Plan is the responsibility of the DLLR's DWDAL. The Division administers the WIOA Title I, Title II, and Wagner-Peyser Programs. The Division also administers the Trade Adjustment Assistance Act program, the JVSG Program, SCSEP, and Maryland Apprenticeship. The SCSEP is also administered by non-state partners, including Senior Service America, Inc. and its subgrantees.<sup>xxx</sup> The Division coordinates the efforts of Maryland's 32 AJCs, which provide comprehensive services to both jobseekers and businesses. While jobseekers are offered a wide range of career and training services, businesses are provided with numerous types of assistance and growth services. The Division's Business Solution Team and Dislocated Worker Services unit provides centralized oversight and administration of Maryland's Rapid Response and Trade Assistance Act (Trade) Program activities. DWDAL coordinates many workforce training activities, including RESEA, ROW, Rapid response, etc. with the DUI, another division within DLLR. DWDAL also has a number of specialized offices focused on the diverse needs of Maryland's businesses and jobseekers.

Maryland's employment and training programs comprise a workforce system that serves the businesses and jobseekers of the state. Among other workforce programs, DLLR's DWDAL administers the WIOA Title I, Title II, and Wagner-Peyser Programs. To provide support and oversight, DWDAL offers:

- Oversight of the state's WIOA Planning Regions that consist of the state's 12 Local Areas;
- Guidance to Local Boards on the Development of regional and local plans that support WIOA implementation and the *Benchmarks of Success*;
- Policies and Procedures that guide the overall workforce system; and
- Technical Assistance related to programming and system improvements.

Maryland has 12 Local Areas, which are governed by Local Boards. These Local Areas administer much of the state's public workforce system in collaboration with Wagner-Peyser funded staff, DLLR's central offices, the GWDB, MSDE's DORS, DHS, and other entities that receive federal funding (e.g. Senior Service America, Inc., Seedco, and Bon Secours). Other partners include community colleges and the public library system. Community colleges provide career and technical education and adult education services across Maryland. Public libraries offer job search and preparation services, workshops, connect jobseekers to the MWE, and provide screening and access to public benefits (e.g. SNAP). Case management and reporting related to employment services and Labor Market Information are coordinated across the state through a statewide information and technology resource called the MWE.

*Office of the Assistant Secretary (OAS)*

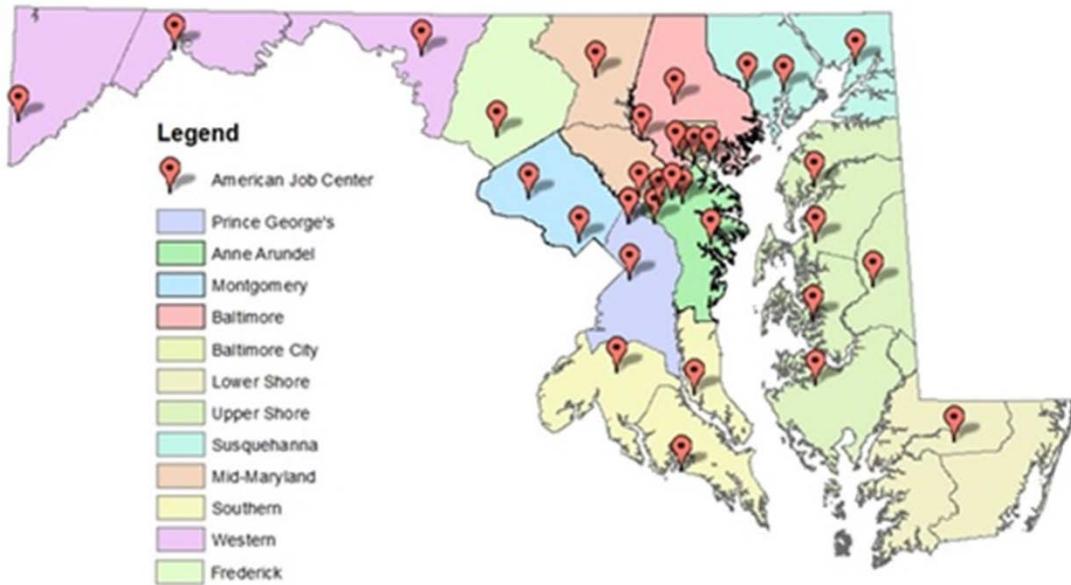
DWDAL is managed by the Division's Assistant Secretary. The Assistant Secretary provides day-to-day supervision of programmatic managers, as well as the strategic vision for the operations of Maryland's workforce system. The office provides centralized oversight for the following:

- Office of Discretionary Grants (ODG) is responsible for developing strategies and partnerships that provide a means for securing additional federal and state funding through the competitive grant process. The ODG successfully secures competitive funds to enhance Maryland's programs and services. Grants target dislocated workers, the long-term unemployed, veterans, and other targeted populations.
- Policy Unit is responsible for leading policies through the process for policy development from beginning to end. When a need for policy is determined, the unit convenes stakeholders and subject matter experts in policy sessions to develop, draft, and implement the Division's policies. The unit works closely with the leadership team and key stakeholders from the business and education community to ensure effective implementation of new laws, regulations, and guidance that affect DLLR DWDAL programs.
- New Americans Initiative was created in 2010 in response to the recommendations of the Maryland Council for New Americans 2009 report, which sought to "expedite immigrant integration into the economic and civic life of the state." Through frequent outreach and community engagement efforts, the New Americans Initiative provides information on the state's training and employment opportunities to those immigrants who call Maryland home. The Initiative further provides multilingual support for AJC staff. The New Americans Initiative promotes adult literacy and English language acquisition for immigrants, including foreign born professionals. Through the New Americans Initiative, DWDAL co-sponsors the Skilled Immigrant Task Force, along with DHS Maryland Office for Refugees and Asylees (MORA). The Maryland Skilled Immigrant Task Force was created in June 2016 to address the issues of LEP, complex licensing and credentialing processes, limited experience of Maryland's workforce system in working with foreign-born individuals, and the lack of social capital on the part of immigrants. The Task Force believes that the State of Maryland can lead the way in creating a win-win environment in which immigrants secure jobs that match their professional and educational backgrounds while simultaneously meeting the hiring demands of the business community.
- Employment Advancement Right Now (EARN) Maryland is the State's nationally-recognized workforce program. The program is industry-led, designed to address business workforce needs by focusing on industry sector strategies that produce long-term solutions to sustained skills gaps and personnel shortages. The EARN coordinator is located in DWDAL's Office of the Assistant Secretary.
- Communications and Outreach Unit works in coordination with various internal and external departments and agencies to ensure that accurate, clear, and consistent messaging regarding DWDAL programs and services is effectively relayed to businesses, jobseekers, and the public.

- Monitoring and Compliance Unit provides fiscal and programmatic monitoring of local workforce and adult education entities to ensure compliance with applicable federal and state law.

## OWD

The OWD coordinates the efforts of Maryland's AJCs. Maryland is home to 32 AJCs across the state – all of which provide comprehensive services to both jobseekers and businesses. While jobseekers are offered a wide range of career and training services, businesses are provided with numerous types of assistance and growth services.



*Graphic 5: Map of Maryland American Job Centers, by Local Workforce Area*

- The AJC Operations Unit provides centralized oversight of DLLR's Labor Exchange Administrators who manage employment and training programs and services throughout the state's AJCs. The Unit provides administrative oversight and jobseeker services through Wagner-Peyser and WIOA Title I Adult, Dislocated Worker, and Youth programs funding.
- Dislocated Worker Services provides centralized oversight and administration of Maryland's Rapid Response, along with the Business Solutions Team, and Trade Assistance Act (Trade) Program activities. Both programs are designed to help individuals through their transition to reemployment.
  - Rapid Response is designed to shorten or eliminate time between employment opportunities for an individual, reducing or eliminating the time an individual would receive UI benefits. Rapid Response activities are coordinated and delivered by a team of workforce professionals, including: DLLR DWDAL Dislocation Services Unit (DSU) staff; DLLR DWDAL Business Solutions staff (including the Regional Business Solutions Consultants and local business solutions representatives); Local Boards, their staff, the Local Area partners, which may include other community partnerships specifically related to the needs

of the laying off business and their employees (e.g. healthcare, financial information, community assistance, etc.); and DLLR DUI staff. Maryland Rapid Response teams work with businesses and employees experiencing a dislocation event to quickly maximize public and private resources and to minimize the disruptions on companies, affected workers, and communities associated with job loss. Local Rapid Response Teams provide customized activities onsite at an affected company or alternate location, accommodate work schedules, and assist companies and workers through the painful transitions associated with job loss.

- Trade Adjustment Assistance Program provides aid to eligible workers who lose their jobs, or whose hours of work and wages are reduced, as a result of increased imports or production transfers abroad. The Trade Program, which is considered to be part of Maryland's WIOA System, is a federal program that offers a variety of benefits and services to workers whose employment has been adversely impacted by foreign trade. Through a number of benefits and services, the Trade Program provides trade-affected workers with opportunities to obtain the support, resources, skills, and credentials they need to return to the workforce in a good job. These include employment and case management services, training, job search allowances, relocation allowances, reemployment and Alternative/Reemployment Trade Adjustment Assistance (ATAA/RTAA) wage subsidies for older workers, and income support in the form of Trade Readjustment Allowances (TRA). The TAA state Merit Staff reviews and makes the final determination on the retraining plan, ensuring it meets the federal requirements under the Trade Act. The Trade Act program is administered, staffed and implemented by the Maryland DLLR, and Local Areas, and the UI Division.
- POAC provides assistance to individuals who are in the professional, executive, technical, managerial, and/or scientific occupations, along with recent college graduates, who find themselves in need of assistance in getting reconnected to the labor market. POAC provides employers with access to an e-service program where they can use active marketing approaches to promote employment opportunities.
- The RESEA Program was developed by the USDOL in an effort to reduce the number of weeks that UI claimants receive benefits, by assisting them in quickly returning to the workforce. The RESEA Program is designed to help claimants to identify potential barriers to employment and assesses work search progress. It also includes an eligibility review, which in turn helps the DLLR DUI to identify claimants that may be out of compliance with basic UI laws and policies regarding ability and availability to work, school attendance, and active work search.
- The ROW Program is a full-day workshop offered to certain UI claimants to shorten the duration of UI benefits received through reemployment efforts
- The Veteran Services Unit operates the JVSG. The JVSG Program's mission is two-fold: it offers employment and training services to Veterans with significant barriers to employment and connects employers with work-ready Veterans.
- The FLC Program is an employment-based immigration program which assists applicable employers, who have obtained USDOL approval to begin the hiring process of permanent or temporary foreign workers. The program assists employers across Maryland in navigating federal program requirements, including application processing, data

collection, wage and prevailing practice surveys in specific employment areas where foreign workers have been brought to Maryland.

- The Tax Credit Unit is charged with administering federal and state tax credit programs which offer income tax incentives to employers for hiring members of targeted population groups, such as ex-offenders or certain individuals with disabilities.
- The MSFW menu of services within the Wagner-Peyser program ensures migrant and seasonal farm workers are receiving the same employment services that non-migrant seasonal farm workers receive at the state's AJCs.
- MRI is a statewide initiative to increase the employability of Maryland citizens with criminal backgrounds. The program provides technical assistance to jobseekers, staff, and employers to increase the number of individuals hired with criminal history and barriers to employment. The MRI administers the federal Bonding Program through the state's AJCs.
- Youth and Disability Services provides disability and youth services coordination and technical assistance to the State of Maryland's Local Areas and partners responsible for serving WIOA Title I youth program participants and AJC customers with disabilities.
- The Business Services Unit exists to help companies grow and thrive, to foster economic growth and stability, and to ensure that Marylanders have opportunities for gainful employment.
- DLLRS serves as the "State Apprenticeship Agency" and, in consultation with the Maryland Apprenticeship and Training Council, is responsible for the following functions in the State: registering apprenticeship programs that meet federal and state standards; issuing certificates of completion to apprentices; encouraging the development of new programs through outreach and technical assistance; protecting the safety and welfare of apprentices; and assuring that all programs provide high-quality training.

#### *OWIP*

OWIP's mission is to collect, analyze, and produce labor market and workforce information as a service to businesses, jobseekers, students, and workforce entities. OWIP carries out five core functions:

- BLS information sharing,
- Labor Market Information Services,
- MWE maintenance,
- MWE Help Desk, and
- WIOA Performance Units.
- 

Additionally, through administering USDOL's Workforce Information Grant, OWIP manages and maintains the Workforce Information Database, the production of industry and occupational employment projections, and other workforce information and economic products and services.

#### *Office of Adult Education and Literacy Services*

The Office of Adult Education and Literacy Services provides services to Maryland's adult learners as required under WIOA Title II. Under the Act, the Office selects local providers of

adult education instructional services via a statewide competition made available to eligible providers every five years. Instructional services include Adult Basic and Secondary Education, English Language Acquisition / Integrated English Literacy and Civics Education, Family Literacy, High School Diploma preparation, and Correctional Education. Maryland's current providers include a wide-range of community colleges, local public school systems, community-based organizations, public libraries, and the state's Correctional Education program. A complete listing of local providers of adult education authorized under Title II can be found at: <http://www.dllr.maryland.gov/gedmd/programs.shtml>. The Office provides monitoring, technical assistance, professional development, and assistance to these providers. The Office further serves as the state's contact for adult education with the United States Department of Education. Also located within the Office is Maryland's GED® and National External Diploma Program® administration. The Office provides key oversight for the administration of these two opportunities for Maryland's adult learners and out-of-school youth to obtain their Maryland High School Diplomas. A complete listing of GED® testing sites in Maryland is found at <http://www.dllr.maryland.gov/gedmd/gedlocations.shtml>.

#### *Correctional Education*

The Office of Adult Education and Literacy Services' Correctional Education provides educational opportunities for incarcerated men and women enabling them to become independent and productive workers, citizens, and parents. Correctional Education, with the oversight of the Correctional Education Council and in partnership with the DPSCS, is responsible for the academic and vocational educational programs provided in Maryland's correctional institutions.

The academic program begins with basic literacy and continues along a learning continuum through high school equivalency completion. Special education services are also available to eligible students. Upon attainment of the Maryland High School Diploma through passage of the GED® examination, students may participate in one of 23 occupational programs or limited post-secondary education courses. Many of the occupational programs provide unique opportunities for the justice-involved individuals to obtain nationally recognized credentials, with the goal of reaching economic self-sufficiency.

<u>Occupational Programs Offered by Maryland Correctional Education</u>	
Architectural CADD	pre-apprenticeship Facilities Maintenance
Automotive Body Repair	pre-apprenticeship HVAC/R
Automotive Maintenance and Inspection	pre-apprenticeship Masonry
Building Maintenance	pre-apprenticeship Plumbing
Fabric and Upholstery Cleaning	pre-apprenticeship Sheet Metal
Furniture Upholstery	pre-apprenticeship Welding
Graphic Arts and Design	Print Communication
Introduction to Word and Excel	Roofing
Office Practice and Management	Small Engine Repair
Office Technology	Warehouse/Distribution

<u>Occupational Programs Offered by Maryland Correctional Education</u>	
pre-apprenticeship Carpentry	Woodworking/Finish Carpentry
pre-apprenticeship Electrical	

*Table 16: Occupational Programs Offered by Maryland Correctional Education*

Transitional programs also provide students with skills for developing short and long-term employment plans including job search strategies and soft skills training for job readiness. In short, the program seeks to provide educational opportunities to support the inmate's successful re-entry and reintegration into the community.

#### *MSDE – DORS*

The public VR Program in Maryland is administered by the MSDE's DORS in accordance with the Rehabilitation Act of 1973, as amended, most recently by the WIOA of 2014. DORS is funded primarily by the United States Department of Education's Rehabilitation Services Administration. The federal funding includes a state matching requirement (federal 78.7 percent and state match of 21.3 percent) and maintenance of effort requirement. DORS provides services and supports to assist eligible students, youth, and adults with significant disabilities transition to post-secondary education, training, and employment. VR services and Pre-Employment Transition Services are provided by the following branches:

- The Office of Field Services provides services such as career counseling, Assistive Technology, vocational training, and job placement services. Staff members are located in 22 field offices located throughout the state, some of which are co-located with AJCs.
- Office for Blindness and Vision Services was established in 2005. Staff located in statewide offices specialize in services to individuals whose primary disability is blindness or vision loss, to assist them in achieving their goals of employment and of independence in their homes and communities. The Office oversees the Maryland Business Enterprise Program (BEP) for the Blind, a program that prepares individuals who are legally blind to operate vending, gift, or food service businesses in public facilities, in accordance with the Randolph Sheppard Act.
- Workforce and Technology Center is a comprehensive VR facility that offers career assessment services, career and skills training, job placement assistance, Assistive Technology services, and other medical and support services. A complete listing of DORS Regions and Offices is available at the following link: <http://dors.maryland.gov/resources/Pages/locations.aspx>.

DORS also engages with businesses throughout the state, assisting Maryland businesses to recruit and maintain qualified, valuable employees. DORS also serves as a resource on disability and employment matters such as disability awareness training, workforce diversity and inclusion initiatives, training on the Americans with Disabilities Act, solutions for reasonable accommodations, and worksite consultations. DORS continues to be dedicated to the creation of the aforementioned Maryland Business Services team.

#### *DHS – FIA*

In Maryland, the TANF program is called TCA and is delivered at the LDSS level. LDSS Offices, a listing of which can be found at [http://www.dhr.state.md.us/blog/?page\\_id=805](http://www.dhr.state.md.us/blog/?page_id=805), is the statewide framework for delivering education, job training, job placement, and other services to assist TANF customers with overcoming barriers to obtaining self-sustaining employment. In Maryland, the efforts led to record TANF job placements in each year of the FY12- 2014 period. Key components of the program include:

- Collaborating with private and public sector partners to identify local growth occupations and their associated education and training requirements
- Assessing customers respective skill sets, career interests, and barriers to obtaining self-sustaining employment
- Developing or procuring appropriate work-related services, including academic remediation, targeted sector training, and job placement services.

TANF workforce development is built on a philosophy of “universal engagement.” This means that customers are expected to participate in activities based on the results of individual assessments with the goal of employment or removing barriers to employment. Many of the remaining welfare families, in addition to many of the new families applying for TCA can be considered “hard to place” into jobs. Workforce development is designed to meet the critical, essential needs of the underemployed, newly unemployed, and hard-to-place. In addition to workforce development, the TANF program provides a broad range of services. The Department’s FIA formed partnerships with other administrations within DHS, including the Child Support Enforcement and Social Services divisions and with other state agencies and community organizations. FIA works with these partners to promote DHS’s goal to protect children by assisting their families to become independent through work, personal and family responsibility, and community involvement. The Department expanded its goal to include support for low-income working families and continues to strengthen those partnerships by empowering staff in the LDSS across the state to work together to provide employment and training activities, supportive services, and benefits that enable customers to obtain jobs and improve their economic circumstances.

#### *DLLR-DUI*

Maryland’s Unemployment Insurance program is administered by DLLR’s Division of Unemployment Insurance (DUI). The program pays benefits to workers who have lost their job through no fault of their own and meet the program’s eligibility requirements. Individuals wishing to file a claim may do so online or via DUI’s Claim Center phone line. Maryland’s AJC staff are also trained to assist customers in filing claims. To help customers to benefit from the wide range of job seeker services available to them through the AJCs and WIOA partners, AJC staff provide presentations to ROW and RESEA participants.

#### *SCSEP*

Maryland’s SCSEP services are designed to assist older workers to develop workplace skills which will enable them to attain permanent, unsubsidized employment, either with their host

agencies or other non-profits, government or private sector employers. Participants are trained by a variety of employers including schools, physicians, health care agencies, hospitals, custodial and maintenance service industries, senior service providers, administrative and management entities, retail merchants, and transportation, security and technology companies. The services of the SCSEP program are available to job seekers, ages 55 and older, who are unemployed, meet established low-income guidelines and desire an opportunity for training and employment. Program participants are given a training assignment that most closely matches their personal goals for employment. Training assignments are coordinated with non-profit or government agencies, also known as host agencies, and are limited to 20 hours per week, at the established minimum wage hourly rate. Applicants are not required to have previous work experience.

#### *Seedco and Bon Secours*

Structured Employment and Economic Development Corporation (Seedco), along with Bon Secours Community Works, is the new RExO partner through the Section 212 grant. They will establish the West Baltimore Career Pathways Collaborative to (1) prepare participants for career pathways in local demand sectors by providing access to training, education, job placement, and career development services; (2) address basic needs and life issues that are barriers for success; and (3) place participants in long-term, well-paying jobs. The West Baltimore Career Pathways Collaborative will conduct this training-to-work adult re-entry project in Baltimore City and West Baltimore within Baltimore County. Seedco/Bon Secours will focus on the demand sectors and career pathways of: (1) Healthcare/Social Assistance, (2) Transportation/Warehousing/Logistics, (3) Manufacturing/Advanced Manufacturing, and (4) Construction.

#### *III(b)(3)(B) State Board. Provide a description of the State Board, including-*

*(i) Membership Roster. Provide a membership roster for the State Board, including members' organizational affiliations.*

#### *Membership Roster*

The Membership Roster shown here is also available online at  
<http://www.gwdb.maryland.gov/board/members.shtml>

**Hon. Lawrence J. Hogan, Jr., Governor**

**(Hon. Boyd K. Rutherford, Lt Governor)**

**Louis M. Dubin**

*Board Chair*

Managing Partner

Redbrick LMD

**Ronald R. Peterson**

*Board Vice-Chair*

President

The Johns Hopkins Health System

**Sam J. Abed**

Secretary  
Department of Juvenile Services

**Honorable Vanessa Atterbeary**  
State Delegate  
**John D. Barber, Jr.**  
President of Local 177  
Northeast Regional Council of Carpenters

**Gary Batey**  
Retired Plan Manager  
Holcim US

**Carol Beatty**  
Secretary  
Maryland Department of Disabilities

**Gary E. Bockrath**  
Consultant – Operational & Financial Tatum

**Francis 'Hall' Chaney, III**  
President  
Chaney Enterprises

**Adrian P. Chapman**  
President and COO  
Washington Gas

**Veronica A. Cool**  
Founder & Managing Director  
Cool & Associates, LLC

**E. Katarina Ennerfelt**  
President/CEO  
ARCON Welding Equipment, LLC

**Christopher M. Ensey**  
Chief Operating Officer  
Dunbar Security Solutions

**James D. Fielder**  
Secretary  
MD Higher Education Commission

**Bernie Fowler**  
Founder and President

Farming 4 Hunger, Inc.

**R. Michael Gill**

Secretary

Department of Commerce

**Steve W. Groenke**

Chief Executive Officer

Curtis Bay Energy

**Alvin C. Hathaway, Sr.**

Senior Pastor

Historical Union Baptist Church of Baltimore

**Tony Hill**

Managing Partner

Edwards & Hill Office Furniture

**Francis 'Frank' X. Kelly, III**

Chief Executive Officer

Kelly & Associates Insurance Group, Inc.

**Charles W. Ketner**

Director

National Automatic Sprinkler Industry

**Allan H. Kittleman**

County Executive

**Rona E. Kramer**

Secretary

Maryland Department of Aging

**Sandra Kurtinitis**

President

Community College of Baltimore County rep. Maryland Association of Community Colleges  
(MACC)

**Andrew B. Larson**

National Project Coordinator

International Union of Painters and Allied Trade, Job Corps Program

**Larry Letow**

President & CEO

Convergence Technology Consulting

**Dawn Lindsay, Ed.D.**

President  
Anne Arundel Community College

**Carl Livesay**  
Vice President of Operations, Land Sea Air Manufacturing

**Roya Mohadjer**  
Senior Technology Strategist  
Leidos

**Stephen T. Moyer**  
Secretary  
DPSCS

**Kirkland 'Kirk' J. Murray**  
President & CEO,  
Anne Arundel Workforce Development Corporation  
President, MD Workforce Investment Network

**Stephen W. Neal**  
President/CEO  
K. Neal International Trucks, Inc.  
K. Neal Idealease

**Alexander G. Núñez**  
Vice President, Governmental and External Affairs, BGE  
Exelon Corporation  
**George W. Owings, III**  
Secretary  
Department of Veterans Affairs

**Lourdes R. Padilla**  
Secretary  
DHS

**Honorable Douglas J.J. Peters**  
State Senator

**Michael Posko**  
CEO  
Habitat for Humanity of the Chesapeake

**Prenterald "P.C." Price**  
President/CEO  
Legal Services Associates, Inc.

**Charles A. Ramos**  
CEO/President  
CR Dynamics & Associates, Inc.

**Edward C. Rothstein (COL Ret)**  
Self-Employed  
ERA Advisory LLC

**Lisa Rusyniak**  
President & CEO  
Goodwill Industries of the  
Chesapeake, Inc.

**Karen Salmon**  
State Superintendent of Schools  
MSDE

**Kelly M. Schulz**  
Secretary  
DLLR

**Martin 'Marty' Schwartz**  
President  
Vehicles for Change

**Gerald 'Jerry' M. Shapiro**  
President  
Shapiro & Duncan, Inc.

**William E. Simons**  
Senior Vice President  
Coakley & Williams Construction, Inc.

**Michelle B. Smith**  
President & CEO  
1st Choice, LLC

**Matt Turpin**  
President and CEO  
ZenTech Manufacturing, Inc.

**Charles T. Wetherington**  
President  
BTE Technologies, Inc.

**Michelle J. Wright**

SVP, Human Resources  
CareFirst BlueCross BlueShield

*(ii) Board Activities. Provide a description of the activities that will assist State Board members and staff in carrying out State Board functions effectively.*

The GWDB is the Governor's chief policymaking body for workforce development. As mandated by WIOA, the GWDB is a business-led board of 53 members, a majority of whom represent the business community. Specifically, 37 members represent business, 11 represent workforce, and 15 represent government. Members include the Governor and the Lieutenant Governor, cabinet secretaries, college presidents, the State Superintendent of Schools, elected officials, labor, and representatives of non-profit organizations.

The full Board holds four quarterly meetings annually, to which the public is invited. The GWDB's Executive Committee holds a quarterly conference call, typically two weeks in advance of full Board meetings to discuss the agenda for upcoming meetings and other issues, as appropriate. Board representation attends quarterly meetings of the State's Interagency Workforce Committee to ensure the Board stays updated on the activities of other Maryland State agencies.

The Executive Director of the GWDB attends monthly meetings of MWA, a coalition of executive directors from Maryland's 12 local workforce agencies. MWA meet monthly with GWDB and DLLR to support a comprehensive workforce system. The group discusses important matters pertaining to the workforce system and exchanges information on current issues.

Expectations for the activities of the GWDB are outlined in the Executive Order signed by Governor Hogan in June 2015. The Executive Order can be accessed at: <http://www.gwdb.maryland.gov/board/execorder.pdf>.

**(4) Assessment and Evaluation of Programs and AJC Program partners.**

(A) Assessment of Core Programs. Describe how the core programs will be assessed each year based on state performance accountability measures described in section 116(b) of WIOA. This state assessment must include the quality, effectiveness, and improvement of programs broken down by Local Area or provider. Such state assessments should take into account local and regional planning goals.

*Measuring Maryland's Success: Performance Accountability*

WIOA made changes to the performance accountability system and created a requirement that the United States Secretaries of Labor and Education create a statistical adjustment model that replaces the regression-based levels that the USDOL used in performance negotiations under the WIA of 1998. USDOL created such a model and states were able to negotiate Program Year (PY) 2016 and PY2017 standards using the model for several measures not indicated as baseline. Under WIOA Adult, Dislocated Worker, JVSG, Wagner-Peyser, Title II and Title IV Performance Measures are as follows:

- Employment Rate QTR2– Percentage of participants in unsubsidized employment in the second quarter after exit (Q2 post-exit).
- Employment Rate QTR4– Percentage of participants in unsubsidized employment in the fourth quarter after exit (Q4 post-exit).
- Median Earnings – Median earnings of participants in the second quarter after exit (Median earnings Q2 after exit).
- Credential Rate – Percentage of participants with post-secondary credential attainment or high school diploma or GED during participation in the program or within one year after exit. (WP and JVSG is excluded)
- Measurable Skills Gain – Percentage of participants who, during the PY, are in education or training programs that lead to recognized post-secondary credential or employment, and who achieve measureable skills gain (documented academic, technical, occupational or other forms of progress, toward the credential or employment). (WP and JVSG is excluded)

In accordance with §677.155(d)(1-6), the primary indicators for the youth program under title I of WIOA are:

#### *WIOA Youth Performance Measures*

- Placement in Employment or Education QTR2 – Percentage of participants who are in education and training, or in unsubsidized employment, during the second quarter after exit (Q2 post-exit).
- Placement in Employment or Education QTR4 – Percentage of participants who are in education and training, or in unsubsidized employment, during the fourth quarter after exit (Q4 post-exit).
- Median Earnings - Median earnings of participants in the second quarter after exit (Median earnings Q2 after exit).
- Credential Rate - Percentage of participants with post-secondary credential attainment or high school diploma or GED during participation in the program or within one year after exit.
- Measurable Skills Gain - Percentage of participants who, during the PY, are in education or training programs that lead to recognized post-secondary credential or employment, and who achieve measureable skill gain (documented academic, technical, occupational or other forms of progress, toward the credential or employment).

In accordance with §677.155(a)(1)(vi), there is a new primary indicator for the effectiveness in serving employers under WIOA, which is:

### *WIOA Effectiveness in Servicing Employers Measures*

- Employer Penetration Rate- addresses the programs' efforts to provide quality engagement and services to all employers and sectors within a state and local economy. Percentage of employers using WIOA core program services out of all employers in the state.
- Repeat Business Customers- addresses the programs' efforts to provide quality engagement and services to employers and sectors and establish productive relationships with employers and sectors over extended periods of time; percentage of employers who have used WIOA core program services more than once during the last three reporting periods.
- Retention with Same Employer in the 2nd and 4th Quarters after Exit. Addresses the programs' efforts to provide employers with skilled workers; Percentage of participants with wage records who exit and were employed by the same employer in the second and fourth quarters after exit.

States must select two of the three measures above to report on for PY2016 and PY2017 PY. Maryland chose to report on all three for PY2016. Maryland has chosen to collect and report all three measures in an effort to provide a complete picture of how the employer

The implementation of WIOA performance accountability requirements were phased in and implemented by July 1, 2016 (PY 2016). Performance reporting of the negotiated performance measures began PY17.

While DLLR, MSDE, and DHR are capable of reporting on each individual program to the respective federal oversight agency, Maryland does not currently have an integrated system that includes partner programs. Under WIOA reporting states must report USDOL program files through the USDOL, while Adult Education and rehabilitation files are submitted through the Department of Education. As shown, the MWE currently houses the following USDOL programs WIOA Adult, Dislocated Worker, Youth, Wagner-Peyser, JVSG, and Trade program participants. While the State has successfully increased the capacity of the MWE by adding in 2017 a module focused on reemployment of UI claimants and will integrate a module for SNAP Employment and Training in 2018, TANF, VR, and Adult Education are not currently in MWE.

The WIOA partners intend to replace the existing multiple systems with a new system that will include imaging and workflow management, and a robust business rules engine to aid in eligibility determination and creating and managing benefit plans, as well as report performance accountability measures.

As previously noted, Maryland's WIOA partners are dedicated to placing customers at the heart of the WIOA system. The *Benchmarks for Success* is one leadership tool that the WIOA partners have developed to drive innovation and collaboration in the State's Workforce System. The State is currently working on a process to incorporate and track the Benchmarks throughout the system and across partners and will make progress through newly formed workgroups in 2018.

Maryland's WIOA partners are further committed to conducting ongoing evaluations of workforce activities carried out in the state in order to promote, establish, implement, and utilize

methods for continuously improving core program activities. This will allow the WIOA system to achieve high-level performance within, and high-level outcomes from the workforce development system.

### *Core WIOA Programs*

WIOA standardizes performance requirements across core programs. For the WIOA Title I Adult and Dislocated Worker Programs, Title II Adult Education and Literacy programs, Title III Wagner-Peyser employment services, and Title IV VR, the primary indicators of performance are, as follows:

- Employment during 2nd quarter after exit,
- Employment during 4th quarter after exit,
- Median earnings,
- Credential attainment rate,
- Measurable skills gain, and
- Effectiveness in serving employers.

For the WIOA Title I Youth program, the primary indicators of performance are, as follows:

- Employment, education, or training during 2nd quarter after exit;
- Employment, education, or training during 4th quarter after exit;
- Median earnings;
- Credential attainment rate;
- Measurable skills gain; and
- Effectiveness in serving employers.

Title III Wagner-Peyser (Employment Services) and JVSG is exempted from Credential Attainment and Measurable Skill Gains. Effectiveness in Serving Employers is a pilot measure, where states must select two of the three federal proposed metrics. This measure is measured across all six core programs. Data sharing agreements are required to secure data from Rehabilitation in order to report these measures for PY2017 and thereafter. For PY2016 Maryland selected to report all three effectiveness measures. WIOA explains that each state shall identify within the State Plan its expected levels of performance for each primary indicator, for each program, for the first two PYs covered by the State Plan. The law subsequently explains that the levels agreed to by the state, the Secretary of Labor, and the Secretary of Education, shall be considered to be the state adjusted performance and shall be incorporated into the State Plan prior to its approval. Maryland received from USDOL further guidance on the WIOA performance measures via Training and Employment Guidance Letters (TEGL 10-16 Change 1) and Training and Employment Notices (TENs). Maryland's WIOA partners are committed to continuing to work closely with USDOL in anticipation of additional information.

**(B) Assessment of AJC Program partner Programs. Describe how other AJC delivery system partner program services and Combined State Plan partner programs included in the plan will be**

assessed each year. Such state assessments should take into account local and regional planning goals.

### *TANF*

The U.S. Department of Health and Human Services assesses state TANF performance based on the Work Participation Rate (WPR) performance indicator. Under the WPR, states must engage TANF work eligible individuals in federally approved, countable work activities for a specific number of hours per week. By statute, the target WPR is 50 percent. Below is Maryland's WPR federal indicator:

- WPR – The total number of work eligible TANF recipients that have met their work requirement, averaging 30 hours per week (20 hours a week for single parents with one or more children under six years old), in the month. In addition to the federal WPR, Maryland assesses performance based on the following indicators:

- Job Placements – The total number of TANF recipients that were placed in a subsidized public employment, subsidized private employment, unsubsidized employment, or on the job training activity;
- Ten Dollar per Hour Job Placements – The total number of TANF recipients that were placed in a subsidized public employment, subsidized private employment, unsubsidized employment, or on the job training activity and scheduled for 30 hours per week or more; and
- Job Retention – Achieve a job retention rate of 75 percent.

Maryland DHR will continue to focus on the primary federal TANF performance measure of 50 percent for WPR. In addition to WPR, DHR will begin to provide and report out data on TANF outcomes for the first three proposed Common Measures: Employment, Retention, and Median Wages. Maryland would like to baseline these TANF Common Measures data for two years to evaluate the effectiveness of the WIOA/TANF mandated partnership, analyze alignment with other WIOA partners' data, and consider adoption of some or all of the Performance Accountability Indicators over time.

### *Trade Program*

USDOL assessed Maryland's Trade performance through the Trade Act Participant Report (TAPR). The TAPR features a data extract capturing the full universe of Trade Adjustment Assistance (TAA) applicants, including TAA participants who receive benefits and services across programs. A standardized set of data elements that includes information on participant demographics, types of services received, and performance outcomes is a key component of this reporting structure. As the TAPR is intended to track information on TAA activity on a "real time" basis for individuals, from the point of TAA eligibility determination through post-participation outcomes, the data are used to respond quickly and effectively to the management information needs of Congress, the Executive Branch agencies of the federal government, and a variety of stakeholders who develop and implement TAA program design. In addition, Trade assessment data are made available to the public based on industry, state, and national aggregates through a queryable search feature on the TAA website located at [www.doleta.gov/tradeact](http://www.doleta.gov/tradeact), which provides an unprecedented level of transparency on TAA participation.

### *JVSG Program*

Annually, the state and USDOL negotiate Maryland's targets for performance measures for employment services for Veterans. Performance during previous periods guides the performance negotiation process to ensure that performance levels are both realistic and challenging. States are expected to develop strategies and policies that demonstrate continuous improvement. USDOL measures the effectiveness of a state's employment services by reviewing:

- The JVSG Program; and,
- All other USDOL administered programs that are offered to Veterans through the AJC delivery system.

Should the state fall short of its negotiated targets, USDOL's Veterans Employment Training Services (VETS) provides technical assistance to help the state achieve success in providing Veterans with employment services that lead to viable opportunities for employment. In accordance with TEGL 8-16, the WIOA core program indicators and reporting requirements now also apply to the JVSG program. Maryland anticipates that additional USDOL VETS guidance is forthcoming on JVSG performance measure.

(C) Previous Assessment Results. Beginning with the state plan modification in 2018 and for subsequent state plans and state plan modifications, provide the results of an assessment of the effectiveness of the core programs and other AJC partner programs and Combined State Plan partner programs included in the Unified or Combined state plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle). Describe how the state is adapting its strategies based on these assessments.

### *Preceding Performance*

Maryland's previous assessment results are, as follows:

WIA Title I & III Performance for PY13			
Performance Measure		Standard	State Performance
Entered Employment Rate			
	Adult	82%	80.3%
	Dislocated Worker	87%	85%
	Wagner-Peyser	55%	51.5%
Retention Rate			
	Adult	87%	88.4%

	Dislocated Worker	91%	91.4%
	Wagner-Peyser	81%	82.4%
<b>Average Earnings</b>			
	Adult	\$15,800	\$16,329
	Dislocated Worker	\$18,500	\$20,127
	Wagner-Peyser	\$15,000	\$15,041
<b>Attainment of Degree or Certificate</b>			
	Youth	70%	80.1%
<b>Placement in Employment or Education</b>			
	Youth	67%	77.2%
<b>Literacy/Numeracy</b>			
	Youth	69%	78.7%

Table 17: WIA Title I & III Performance for PY13

#### WIA Title I & III Performance for PY14

Performance Measure		Stand ard	State Performance
<b>Entered Employment Rate</b>			
	Adult	82%	78.6%
	Dislocated Worker	87%	82.2%
	Wagner-Peyser	55%	53.2%
<b>Retention Rate</b>			
	Adult	89%	90.8%
	Dislocated Worker	91%	92.2%
	Wagner-Peyser	81%	82.9%
<b>Average Earnings</b>			
	Adult	\$16,5 00	\$17,289
	Dislocated Worker	\$19,5 00	\$21,204
	Wagner-Peyser	\$15,0 00	\$15,062

Attainment of Degree or Certificate			
Youth	76%	77.6%	
Placement in Employment or Education			
Youth	73%	78.3%	
Literacy/Numeracy			
Youth	70%	74.1%	

Table 18: WIA Title I & III Performance for PY14

*WIA Title I and Title III Performance PY2015*

Performance Measure		Standard	State Perform.	% Standard
<i>Entered Employment Rate</i>	Adults	82%	75.4%	91.9%
	Dislocated Workers	87%	78.6%	90.3%
	Labor Exchange	55%	55.8%	101.4%
<i>Retention Rate</i>	Adults	89%	86.8%	97.5%
	Dislocated Workers	91%	91.2%	100.2%
	Labor Exchange	81%	81.5%	100.6%
<i>Average Earnings</i>	Adults	\$16,500	\$16,694	101.2%
	Dislocated Workers	\$19,500	\$20,693	106.1%
	Labor Exchange	\$15,000	\$15,429	102.9%
<i>Youth Attainment of Degree or Certificate</i>		76%	77.8%	102.4%
<i>Youth Placement in Employment or Education</i>		73%	76.9%	105.3%

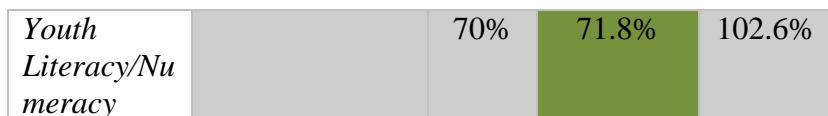


Table 19: WIA Title I & III Performance for PY15

### WIOA Title II Adult Education

Core Follow-Up Outcome Achievement, July 1, 2013 – June 30, 2014

	Participants in Cohort	Participants Responding to Survey or Available for Data Matching	Response Rate or % Available for Match	# of Participants Achieving Outcomes (Unweighted)	# of Participants Achieving Outcome (Weighted)	# Achieving Outcome (Weighted)
Entered Employment	8,431	6,512	77%	1,982	2,566	30%
Retained Employment	9,906	6,176	62%	3,903	6,260	63%
Obtained a Secondary School Credential or its Equivalent	3,205	3,187	99%	1,828	1,838	57%
Entered Post-secondary Education or Training – current PY	4,342	4,342	100%	304	304	7%
Entered Post-secondary Education or Training – prior PY	3,211	3,211	100%	317	317	10%

Educational Gains & Attendance for Pre- & Post-Tested Participants, July 1, 2013 – June 30, 2014

Entering EFL	Total # Enrolled Pre- and Post-tested	Total Attendance Hours	# Completed Level	# Who Completed a Level & Advanced 1 or more Levels	# Separated Before Completing	# Remaining within Level	% Completing Level
ABE Beginning Literacy	445	50,898	265	246	170	10	60%
ABE Beginning Basic Literacy	1,285	171,919	941	867	325	19	73%
ABE Intermediate Low	2,352	293,023	1467	1,382	759	126	62%
ABE Intermediate High	3,577	470,101	1192	1,109	2,095	290	33%
ASE Low	725	96,941	215	195	477	33	30%
ASE High	355	38,591	166	0	175	14	47%
ESL Beginning Literacy	760	71,020	657	606	79	24	86%
ESL Beginning Low	1,243	114,141	1045	943	138	60	84%
ESL Beginning High	2,602	231,571	1740	1,564	521	341	67%
ESL Intermediate Low	3,079	271,160	1747	1,552	871	461	57%
ESL Intermediate High	2,211	201,551	1118	1,013	762	331	51%
ESL Advanced	1,090	96,643	167	0	718	205	15%

TOTAL	19,724	2,107,559	10,720	9,477	7,090	1914	54%
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Table 20: WIOA Title II Adult Education - Core Follow-Up Outcome Achievement and Educational Gains & Attendance for Pre- & Post-Tested Participants, July 1, 2013 – June 30, 2014

EFL = Educational Functioning Level; ABE = Adult Basic Education; ASE = Adult Secondary Education; ESL = English as a Second Language

Educational Gains & Attendance by Educational Functioning Level, July 1, 2014 – June 30, 2015							
Entering EFL	Total # Enrolled	Total Attendance Hours	# Completed Level	# Who Completed a Level & Advanced 1 or more Levels	# Separated Before Completing	# Remaining within Level	% Completing Level
ABE Beginning Literacy	781	67,019	265	246	491	25	34%
ABE Beginning Basic Literacy	2,065	212,454	941	867	1,066	58	46%
ABE Intermediate Low	3,684	351,153	1,467	1,382	1,997	220	40%
ABE Intermediate High	6,304	613,479	1,192	1,109	4,587	525	19%
ASE Low	1,709	150,571	470	195	1,160	79	28%
ASE High	893	71,573	365	0	475	53	41%
ESL Beginning Literacy	1,062	80,208	657	606	337	68	62%
ESL Beginning Low	1,665	126,511	1,045	943	450	170	63%
ESL Beginning High	3,425	257,402	1,740	1,564	1,166	519	51%
ESL Intermediate Low	4,038	301,885	1,747	1,552	1,623	668	43%
ESL Intermediate High	2,943	228,277	1,118	1,013	1,363	462	38%
ESL Advanced	1,485	110,919	167	0	1,067	251	11%
<b>TOTAL</b>	<b>30,054</b>	<b>2,571,451</b>	<b>11,174</b>	<b>9,477</b>	<b>15,782</b>	<b>3,098</b>	<b>37%</b>

Table 21: Educational Gains & Attendance by Educational Functioning Level, July 1, 2014 – June 30, 2015

EFL = Educational Functioning Level; ABE = Adult Basic Education; ASE = Adult Secondary Education; ESL = English as a Second Language

	Participants in Cohort	Participants Responding to Survey or Available for Data Matching	Response Rate or % Available for Match	# of Participants Achieving Outcomes (Unweighted)	# of Participants Achieving Outcome (Weighted)	# Achieving Outcome (Weighted)
Entered Employment	6,135	5,088	83%	1,587	1,914	31%
Retained Employment	11,158	7,274	65%	5,009	7,684	69%
Obtained a Secondary School Credential or its Equivalent	1,810	1,810	100%	985	985	54%
Entered Post-secondary Education or Training – current PY	6,756	6,756	100%	251	251	4%
Entered Post-secondary Education or Training – prior PY	4,342	4,342	100%	411	411	9%

## Educational Gains &amp; Attendance for Pre- &amp; Post-Tested Participants, July 1, 2014 – June 30, 2015

Entering EFL	Total # Enrolled Pre- and Post-tested	Total Attendance Hours	# Completed Level	# Who Completed a Level & Advanced 1 or more Levels	# Separated Before Completing	# Remaining within Level	% Completing Level
ABE Beginning Literacy	435	57,287	272	250	79	84	63%
ABE Beginning Basic Literacy	901	108,227	641	567	213	47	71%
ABE Intermediate Low	2,117	269,290	1,297	1,163	644	176	61%
ABE Intermediate High	2,949	359,290	969	858	1,556	424	33%
ASE Low	820	131,247	273	238	415	132	33%
ASE High	456	78,790	149	0	214	93	33%
ESL Beginning Literacy	867	70,058	734	668	124	9	85%
ESL Beginning Low	957	84,238	732	686	200	25	76%
ESL Beginning High	2,431	212,971	1,481	1,401	845	105	61%
ESL Intermediate Low	2,528	227,220	1,282	1,240	1,120	126	51%
ESL Intermediate High	2,014	177,876	849	807	1,059	106	42%
ESL Advanced	1,058	92,712	299	0	700	59	28%
<b>TOTAL</b>	<b>17,533</b>	<b>1,869,780</b>	<b>8,978</b>	<b>7,878</b>	<b>7,169</b>	<b>1,386</b>	<b>51%</b>

Table 22: Core Follow-Up Outcome Achievement and Educational Gains &amp; Attendance for Pre- &amp; Post-Tested Participants, July 1, 2014 – June 30, 2015

## Educational Gains & Attendance by Educational Functioning Level, July 1, 2014 – June 30, 2015

Entering EFL	Total # Enrolled	Total Attendance Hours	# Completed Level	# Who Completed a Level & Advanced 1 or more Levels	# Separated Before Completing	# Remaining within Level	% Completing Level
ABE Beginning Literacy	766	83,851	272	250	360	134	36%
ABE Beginning Basic Literacy	1,576	155,506	641	567	819	116	41%
ABE Intermediate Low	3,508	349,603	1,297	1,163	1,912	299	37%
ABE Intermediate High	5,468	476,314	969	858	3,793	706	18%
ASE Low	1,734	200,056	395	238	1,081	258	23%
ASE High	1,030	111,920	293	0	558	179	28%
ESL Beginning Literacy	1,363	84,638	734	668	610	19	54%
ESL Beginning Low	1,405	96,760	732	686	637	36	52%
ESL Beginning High	3,442	243,901	1,481	1,401	1,828	133	43%
ESL Intermediate Low	3,492	258,004	1,282	1,240	2,050	160	37%
ESL Intermediate High	2,764	202,678	849	807	1,789	126	31%
ESL Advanced	1,449	106,050	299	0	1,078	72	21%
<b>TOTAL</b>	<b>27,997</b>	<b>2,369,281</b>	<b>9,244</b>	<b>7,878</b>	<b>16,515</b>	<b>2,238</b>	<b>33%</b>

Table 23: Educational Gains & Attendance by Educational Functioning Level, July 1, 2014 – June 30, 2015

### WIOA Title IV VR DORS - Federal Standards & Indicators Report, Federal FYs 2014 & 2015

Standard	Federal FY14	Federal FY15	Federal Standard
Number of Closed Cases with an Employment Outcome	2,545	2,559	At least one more than the previous year.
Standards			Federal Minimum Standard
Of the Closed Cases that received services, the percentage with an Employment Outcome	59.08%	59.65%	55.80%
Of the Closed Cases with an Employment Outcome, the percentage that have a wage greater than or equal to Minimum Wage.	95.09%	90.47%	72.60%
Of the Closed Cases with an Employment Outcome, the percentage that have a wage greater than or equal to the Minimum Wage and have Significant Disabilities.	100.00%	100.00%	62.40%
Ratio of Average State Wage to the average wage of Closed Cases with Employment Outcome that have wages greater than or equal to Minimum Wage.	0.42	0.44	0.52

## DORS - Federal Standards & Indicators Report, Federal FYs 2014 & 2015

Difference between the percentage of Closed Cases with Employment Outcomes that have a wage greater than or equal to the Minimum Wage that are Self Support at Application and the percentage of Closed Cases with Employment Outcomes that have a wage greater than or equal to the Minimum Wage that are Self Support at Closure.	67.645	68.596	53.000
Ratio of Minority Service Rate to Non-Minority Service Rate	0.841	0.894	0.800

Table 23: DORS - Federal Standards & Indicators Report, Federal FYs 2014 & 2015

### TANF

TANF, Federal FY 2014 Aggregate Scores At-A-Glance				
Jurisdiction	WPR	Total Job Placements	Total Full-Time \$10/hr. Job Placements	
<b>Large Counties</b>				
	Baltimore City	52%	5030	1020
	Baltimore County	55%	1713	514
	Prince George's	65%	1099	281
<b>Medium Counties</b>				
	Anne Arundel	56%	1232	375
	Montgomery	56%	768	235
	Wicomico	55%	322	47
	Harford	55%	476	134
	St. Mary's	55%	261	20
	Howard	42%	262	65
	Washington	62%	246	41
	Cecil	50%	227	48
<b>Small Counties</b>				
	Frederick	67%	360	137
	Charles	54%	130	31
	Allegany	58%	139	12
	Dorchester	54%	90	8
	Caroline	79%	117	14
	Carroll	56%	106	36
	Somerset	54%	128	19
	Queen Anne's	67%	70	10
	Calvert	68%	108	25
	Worcester	73%	67	15
	Garrett	55%	35	3

TANF, Federal FY 2014 Aggregate Scores At-A-Glance				
	Talbot	33%	55	22
	Kent	57%	74	14
<b>MARYLAND</b>		<b>55%</b>	<b>13,115</b>	<b>3126</b>

Table 24: TANF, Federal FY 2014 Aggregate Scores At-A-Glance

TANF, Federal FY 2015 Aggregate Scores At-A-Glance

Jurisdiction	WPR	Total Job Placements	Total Full-Time \$10/hr. Job Placements
<b>Large Counties</b>			
	Baltimore City	52%	5572
	Baltimore County	54%	1611
	Prince George's	63%	1147
<b>Medium Counties</b>			
	Anne Arundel	52%	1184
	Montgomery	59%	748
	Wicomico	53%	303
	Harford	58%	471
	St. Mary's	56%	277
	Howard	67%	204
	Washington	65%	246
	Cecil	49%	237
<b>Small Counties</b>			
	Frederick	67%	322
	Charles	59%	149
	Allegany	52%	146
	Dorchester	57%	107
	Caroline	71%	94
	Carroll	54%	119
	Somerset	53%	112
	Queen Anne's	63%	43
	Calvert	68%	98
	Worcester	61%	66
	Garrett	63%	29
	Talbot	23%	73
	Kent	59%	55
<b>MARYLAND</b>	<b>55%</b>	<b>13,413</b>	<b>3,519</b>

*Table 25: TANF, Federal FY 2015 Aggregate Scores At-A-Glance*

*Trade Program*

Trade Program Assessment Results for FY14

Measure	Goal	FY 14 Q1 (as of 4/9/14)	FY 14 Q2 (as of 6/6/14)	FY 14 Q3 (as of 9/5/14)	FY 14 Q4 (as of 12/9/14)
Training Expenditures	85% - 115%	132.5%	166.8%	55.9%	65.7%
TRA Expenditures	85% - 115%	49.1%	98.3%	98.0%	94.0%
A/RTAA Expenditures	85% - 115%	93.2%	92.9%	97.3%	94.7%
Job Srch / Reloc Exp	85% - 115%	0.0%	0.0%	100.0%	100.0%
Tenure	100%	97.5%	98.7%	98.8%	98.9%
ONET	100%	0.9%	0.8%	69.9%	79.1%
ISP	100%	74.4%	69.8%	100.0%	100.0%
NAICS	90%	100.0%	100.0%	96.8%	93.8%
Credential	50%	25.9%	32.1%	37.8%	40.3%
Rapid Response	50%	21.8%	16.7%	51.5%	74.3%
Case Management	50%	73.8%	87.7%	83.2%	83.4%
First TAA Date	90%	99.7%	100.0%	100.0%	100.0%
Agent Liable	75%	89.4%	91.4%	94.9%	93.5%
Employment After Exit	100%	100.0%	100.0%	100.0%	100.0%
Wages Prior	100%	100.0%	100.0%	100.0%	100.0%
Wages Following	100%	100.0%	100.0%	100.0%	100.0%

Trade Program Assessment Results for FY 15

Measure	Goal	FY 15 Q1 (as of 3/10/15)	FY Q2 (as of 6/4/2015)	FY 15 Q3 (as of 9/2/15)	FY 15 Q4 (as of 12/10/15)
Training Expenditures	85% - 115%	Discrepancy	Discrepancy	Discrepancy	Adjustment
TRA Expenditures	85% - 115%	Pass	Pass	Pass	Pass
A/RTAA Expenditures	85% - 115%	Pass	Pass	Pass	Pass
Job Srch / Reloc Exp	85% - 115%	Pass	Discrepancy	Discrepancy	Pass
Tenure	100%	100.0%	100.0%	99.0%	100.0%
ONET	100%	82.1%	74.2%	78.7%	84.7%
ISP	100%	100.0%	100.0%	100.0%	100.0%
NAICS	90%	94.1%	96.5%	95.9%	97.4%
Credential	50%	46.4%	50.9%	51.6%	55.9%
Rapid Response	55%	64.4%	60.0%	65.3%	60.0%
Case	50%	83.2%	80.4%	78.6%	78.9%

## Trade Program Assessment Results for FY14

Management					
First TAA Date	90%	100.0%	100.0%	100.0%	100.0%
Agent Liable	75%	92.7%	88.8%	79.7%	78.1%
Employment After Exit	100%	100.0%	100.0%	100.0%	100.0%
Wages Prior	100%	100.0%	100.0%	100.0%	100.0%
Wages Following	100%	100.0%	100.0%	100.0%	100.0%

Table 26: Trade Program Assessment Results for FY 2014 and 2015

## JVSG

### PY 13 Veterans Program Assessment Results

Performance Targets for JVSG Staff	Negotiated Targets	Q-4 Performance	% of Standard
Intensive Services Provided to Individuals by DVOP Specialists/Total Veterans and Eligible Persons Served by DVOP Specialists in the state	48%	59.2%	123%
Veterans' Entered Employment Rate (weighted)	60%	56%	93%
Veterans' Employment Retention Rate	84%	82%	98%
Veterans' Average Earnings (Six-Months)	\$20,400	\$19,223	94%
Disabled Veterans' Entered Employment Rate	50%	48%	96%
Disabled Veterans' Employment Retention Rate	83%	82%	99%
Disabled Veterans' Average Earnings (Six Months)	\$23,400	\$22,558	96%
Performance Targets for Labor Exchange Services for Veterans	Negotiated Targets	Q-4 Performance	% of Standard
Veterans' Entered Employment Rate	55%	51%	93%
Veterans' Employment Retention Rate	84%	83%	99%
Veterans' Average Earnings (Six-Months)	\$20,300	\$19,627	97%
Disabled Veterans' Entered Employment Rate	50%	47%	94%
Disabled Veterans' Employment Retention Rate	85%	83%	98%
Disabled Veterans' Average Earnings (Six Months)	\$23,000	\$23,227	101%

Table 27: PY 13 Veterans Program Assessment Results

PY 14 Veterans Program Assessment Results			
Performance Targets for JVSG Staff	Negotiated Targets	Q-4 Performance	% of Standard
Intensive Services Provided to Individuals by DVOP Specialists/Total Veterans and Eligible Persons Served by DVOP Specialists in the state	75%	81%	108%
Veterans' Entered Employment Rate (weighted)	57%	65%	114%
Veterans' Employment Retention Rate	83%	82%	99%
Veterans' Average Earnings (Six-Months)	\$19,400	\$18,264	94%

PY 14 Veterans Program Assessment Results			
Disabled Veterans' Entered Employment Rate	49%	49%	100%
Disabled Veterans' Employment Retention Rate	83%	81%	98%
Disabled Veterans' Average Earnings (Six Months)	\$22,600	\$20,556	91%

Performance Targets for Labor Exchange Services for Veterans	Negotiated Targets	Q-4 Performance	% of Standard
Veterans' Entered Employment Rate	52%	54%	104%
Veterans' Employment Retention Rate	84%	82%	98%
Veterans' Average Earnings (Six-Months)	\$19,700	\$19,290	98%
Disabled Veterans' Entered Employment Rate	50%	48%	96%
Disabled Veterans' Employment Retention Rate	84%	81%	96%
Disabled Veterans' Average Earnings (Six Months)	\$23,300	\$22,615	97%

Table 28: PY 14 Veterans Program Assessment Results

(D) **Evaluation.** Describe how the state will conduct evaluations and research projects on activities under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA.

Recognizing that program evaluation and research are two key components of achieving overall system improvement, Maryland's WIOA Partners are committed to working with appropriate organizations to design and coordinate projects that inform sound WIOA policy making that is refined to appropriately meet shared customer needs. Evidence provided by research and evaluations can improve policy in two main ways: it can lead policymakers to adopt or scale-up programs or policies that are found to have net social benefits; or, it can lead policymakers to terminate existing programs that are found to have net social costs. The WIOA Partners, therefore, agree to explore how independent evaluation efforts, that have been historically contracted by each agency independently, can be coordinated to provide a comprehensive, deeper look at the overall WIOA system.

(5) **Distribution of Funds for Core Programs.** Describe the methods and factors the state will use in distributing funds under the core programs in accordance with the provisions authorizing such distributions.

(A) For Title I programs, provide a description of the written policies that establish the state's methods and factors used to distribute funds to Local Areas for—

Maryland is working to establish a new fiscal policy to appropriately describe the methods and factors the state uses in distributing funds under the WIOA Title I Adult, Dislocated Worker, and Youth programs.

TEGL 29-14 outlines methods upon which the state must allocate WIOA Title I funds. The allocation methods for Youth and Adult funds are a fixed formula. The allocation method for Dislocated Worker funds allows flexibility at the state level within given parameters.

(i) Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),

Maryland will distribute WIOA Title I Youth funds in accordance with the formula allocation method cited in WIOA Section 128 (b)(2)(A). As such, 15 percent of the funds will be set aside as the Governor's Reserve, and 85 percent of funds will be distributed to the Local Areas using the following three factors enumerated in Section 127(b)(1)(C) of WIOA:

- 33 1/3 percent shall be allotted on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each Local Area, compared to the total number of unemployed individuals in areas of substantial unemployment in all states;
- 33 1/3 percent shall be allotted on the basis of the relative excess number of unemployed individuals in each state, compared to the total excess number of unemployed individuals in all states; and
- 33 1/3 percent shall be allotted on the basis of the relative number of disadvantaged youth in each state, compared to the total number of disadvantaged youth in all states. In determining an allotment in relation to a Local Area's disadvantaged youth, the allotment shall be based on the higher of— (1) the number of individuals who are age 16 through 21 in families with an income below the low income level in such area; or (2) the number of disadvantaged youth in such area.

The Local Area shall not receive an allocation percentage for a FY that is less than 90 percent of the average allocation percentage of the Local Area for the two preceding FYs. Amounts necessary for increasing such allocations to Local Areas to comply with the preceding sentence shall be obtained by ratably reducing the allocations to be made to other Local Areas.

**(ii) Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3),**

Maryland will distribute WIOA Title I Adult funds in accordance with the formula allocation method cited in WIOA Section 133 (b)(2)(A). As such, 15 percent of the funds will be set aside as the Governor's Reserve, and 85 percent of funds will be distributed to the Local Areas using the following three factors enumerated in Section 132(b)(1)(B) of WIOA:

- 33 1/3 percent shall be allotted on the basis of the relative number of unemployed individuals in areas of substantial unemployment in each Local Area, compared to the total number of unemployed individuals in areas of substantial unemployment in the state;
- 33 1/3 percent shall be allotted on the basis of the relative excess number of unemployed individuals in each Local Area, compared to the total excess number of unemployed individuals in the state; and
- 33 1/3 percent shall be allotted on the basis of the relative number of disadvantaged adults in each Local Area, compared to the total number of disadvantaged adults in the state. The allotment shall be based on the higher of— (1) the number of adults in families with an income below the low-income level in such area; or (2) the number of disadvantaged adults in such area.

The Local Area shall not receive an allocation percentage for a FY that is less than 90 percent of the average allocation percentage of the Local Area for the two preceding FYs. Amounts

necessary for increasing such allocations to Local Areas to comply with the preceding sentence shall be obtained by ratably reducing the allocations to be made to other Local Areas.

(iii) Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.

Maryland will distribute WIOA Title I Adult funds in accordance with the formula allocation method cited in WIOA Section 133 (b)(2)(A). 15 percent of the funds will be set aside as the Governor's Reserve, 17.5 percent of the funds will be set aside for Rapid Response Activities (the allowable maximum for Rapid Response is 25 percent), and 67.5 percent of funds will be distributed to the Local Areas

The Maryland WIOA Fiscal Accountability Workgroup, comprised of Local Directors, local staff, and staff from the DWDAL, met multiple times to discuss the allocation formula for Dislocated Worker funds administered under Title I of WIOA. The workgroup used as a guide Section 133 of WIOA and TEGL 29-14 and examined how the funds were administered previously. Specifically, WIOA Section 133 provides that information that can be used in the formulation of the Dislocated Worker allocation includes "insured unemployment data, unemployment concentrations, plant closing and mass layoff data, declining industries data, farmer rancher economic hardship data, and long-term unemployment data." Utilizing the data referenced above, which included unemployment statistics, Quarterly Census of Employment and Wages and other BLS data, and other sources, the workgroup identified six factors to be used to determine the local Dislocated Worker formula:

1. UI Exhaustee,
2. Insured Unemployed,
3. Unemployed,
4. Declining Industries,
5. Mass Layoffs/Plant Closings, and
6. Farmer/Rancher Data.

The workgroup also recommended the priority of the factors. While recommendations were made, the workgroup deferred any final decision regarding the factors used, and the weighting of those factors. Consistent with the purpose of the dislocated worker program, the allocation method addresses current and future needs by focusing on unemployed individuals. Maryland combines the Insured Unemployed and Unemployed into one factor with a high assigned weighting. This was done to ensure that all unemployed individuals, regardless of their status as receiving UI benefits, can utilize dislocated worker funding within the existing constraints of the law.

Based on that conversation and substantial research and data analysis, it was concluded that the final factors and weighting for the Dislocated Workers local formula allocations are:

1. Priority Weighting Unemployed 49 percent;
2. UI Exhaustee 29 percent;
3. Declining Industries eight percent;

4. Mass Layoffs/Plant Closings (WARN and other data) seven percent; and
5. Farmer/Rancher Data seven percent.

Dislocated Workers Formula Allocation Factors	Priority	Weighting
Unemployed	1	49 percent
UI Exhaustee	2	29 percent
Declining Industries	3	8 percent
Mass Layoffs/Plant Closings (WARN and other data)	4	7 percent
Farmer/Rancher Data	5	7 percent

*Table 29: factors and weighting for the Dislocated Workers local formula allocations*

As this is a change in the way the formula was previously structured, Local Areas that would receive less than 90 percent of their relative share as compared to their last two years' funding level will be held at 90 percent. This is in accordance with guidance set forth in TEGL 3-15.

Again, it is noted that pursuant to Policy Issuance 2016-01: Transfer Authority for WIOA Title I Adult and Dislocated Worker Funds, as issued on January 12, 2016, and consistent with Section 133 of WIOA, a Local Area may transfer up to and including 100 percent of a PY and FY allocation for Adult employment and training activities, and up to and including 100 percent of a PY and FY allocation for Dislocated Worker employment and training activities between the two programs. Transfers may only occur between Adult and Dislocated Worker funds within the same funding phase.

**(B) For Title II:**

(i) Describe how the eligible agency will award multi-year grants or contracts on a competitive basis to eligible providers in the State, including how eligible agencies will establish that eligible providers are organizations of demonstrated effectiveness.

*WIOA Title II - Adult Education & Literacy Services*

For the Title II Adult Education fund, Maryland awards grants to eligible providers through a competitive application process, to establish or operate programs that provide adult education and literacy activities. The application process is open to eligible providers for seamless delivery of services, ensuring that services are available in every jurisdiction based on the level of need. The services provided must focus on the adult education goals described in WIOA Title II, including helping adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency.

In 2016, the office of Adult Education and Literacy Services (AELS) at DLLR developed a competitive Request for Proposals (RFP) for Adult Education and Family Literacy Services in Maryland, authorized and funded under WIOA Title II. The development process for this RFP

included input from partner programs within DLLR's Division of Workforce Development and Adult Learning as well as the external WIOA partners, however AELS assumed the lead to ensure that all Title II requirements were included in the RFP. The RFP was posted on the DLLR website in January 2017, seeking local providers of services to commence operation on July 1, 2017, continuing for a 5-year period, pending compliance with all requirements of the RFP. During the 5-year period, annual continuation applications are required that must include activity and partnership updates, performance reviews and projections, annual class schedules, data quality reviews, budgets and assurances. All applicants for WIOA Title II funding were required to submit a proposal in response to this RFP.

No other requests for funding under this Act were considered, with the possible exception that a separate RFP will be developed for Integrated English Literacy and Civics Education (IELCE) as required under Section 243 of WIOA, Title II. (Should there be a separate RFP for IELCE, it would follow the same process of development and dissemination as the RFP for Adult Education and Family Literacy Services, with the DLLR office of AELS assuming the lead and ensuring compliance with all aspects of the Act.)

Funding allocations by county were determined by AELS, on the basis of need and demand. Need was established through U.S. Census data identifying the numbers of individuals residing in counties with less than a high education and with English language barriers. Demand was established from historical adult education enrollment data by county. Proposals submitted in response to the competitive RFP were reviewed by AELS, along with an independent team of reviewers including individuals with knowledge and expertise in adult education, WIOA partner agency officials, and DWDAL personnel.

Reviewers scored applications on the considerations set out in WIOA, Title II, Section 231. Demonstrated effectiveness was determined by the applicant's submission of verifiable data that documented previous successful provision of services, specifically identifying that participants enrolled in the services demonstrated success in achieving the performance measures required in WIOA, Title I, Section 116.

The following services are funded:

#### Adult Education & Family Literacy Act Services

Adult Basic Skills Education Programs	Maryland adult education programs provide instruction in adult basic skills for adults with low basic skills, or low educational attainment, and will help the most vulnerable adults to gain access to the services they need
Adult Secondary Education Programs	Adult secondary education instruction are provided for students functioning at the adult secondary education level in preparation for a high school diploma through GED® testing or the National External Diploma Program®

### Adult Education & Family Literacy Act Services

English Language Acquisition Programs	English language acquisition programs are provided, especially in jurisdictions with a high population of English language learners. Instructional programs will be required to incorporate mathematics instruction as required in the new law.
Integrated English Literacy & Civics Education	The integrated English literacy and civics education provides instruction that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens. Such services include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation. This may also include workforce training (depending on which section of services are provided).

*Table 30: Adult Education & Family Literacy Act Services*

(ii) Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.

As the oversight and administrative agency for WIOA Title II adult education programs, DLLR evaluates past performance in delivering adult education and family literacy activities, in order to assess the effectiveness of applicants during the competitive process. Selected applicants must document success in providing adult education and literacy services. DLLR convened one statewide application process for eligible providers. Title II providers in each jurisdiction were selected on the basis of this competition.

The DLLR office of AELS was responsible for developing and disseminating the RFP for services to be delivered by local providers, as authorized and funded under WIOA Title II. The RFP was posted publicly on the DLLR website. Only providers who responded to the RFP in a timely manner, adhering to all submission requirements and deadlines were considered for funding under WIOA Title II. Funds were not be awarded to providers who did not apply for funds under this uniform competition. DLLR directly awarded grants to providers deemed to have successfully responded to the RFP requirements and satisfactorily documented previous success in providing the services. Sub-contracts were considered for funding.

Proposals submitted in response to the competitive RFP were reviewed by AELS, along with an independent team of reviewers that included individuals with knowledge and expertise in adult education, WIOA partner agency officials, and DWDAL personnel. Reviewers scored applications on the considerations set out in WIOA, Title II, Section 231.

**(C) Title IV VR**

In the case of a state that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a state agency to administer the part of the VR services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the state to determine the distribution of funds among the two VR agencies in the state.

DORS is a Combined Agency that provides services for individuals who are blind. As such this provision is not applicable in Maryland.

**(6) Program Data**

(A) Data Alignment and Integration. Describe the plans of the lead state agencies with responsibility for the administration of the core programs, along with the state Board, to align and integrate available workforce and education data systems for the core programs, UI programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the state's plan for integrating data systems should include the state's goals for achieving integration and any progress to date.

(i) Describe the state's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation.

*WIOA Program Data and System Alignment*

WIOA Program	Data System(s) Used	Year Contract Expires
Adult Program	MWE	2019
Dislocated Worker Program	MWE	2019
Youth Program	MWE	2019

Wagner-Peyser Act Program	MWE	2019
Adult Education and Family Literacy Act Program	Literacy and Community Education System	2019
VR Program	AWARE	2020
TANF Program	WORKS	2017
Trade Adjustment Assistance for Workers Program	MWE	2019
JVSG Program	MWE	2019
SCSEP	MWE	2019
RExO	N/A	N/A
Apprenticeship	RAPIDS	N/A

Table 31: WIOA Program Data and System Alignment

The following section details Maryland’s plans on how it will ensure that WIOA data systems become aligned and better integrated, all the while maintaining privacy and the highest ethical standards. Under WIOA, states can report an integrated or non-integrated extract based on current federal register documents. Maryland is committed to moving towards an integrated system, but it has not reached that point yet. The following chart documents the data systems used, by WIOA program and contract end date:

While DLLR, MSDE, and DHS are capable of reporting on each individual program to the respective federal oversight agency, Maryland does not currently have an integrated system with all partner programs. DLLR is therefore currently unable to report data from agencies, like MSDE-DORS and DHS-FIA, which report outside of the MWE system.

As shown, the MWE currently houses WIOA Adult, Dislocated Worker, Youth, Wagner-Peyser, JVSG, Trade, and SCSEP program participants, however, TANF, VR, Adult Education, RExO, and Apprenticeship are not currently in MWE. Due to contract end dates in 2019 and 2020, the WIOA leadership team recognizes that Maryland needs both short- and long-term solutions and goals to data sharing and alignment. To reach the long-term goal of system integration or alignment, the WIOA leadership team will work to identify potential options for common platforms and data integration. The team will schedule demonstrations with vendors and will work together to weigh the advantages and disadvantages of the options available.

DHS is leading discussions with WIOA partners on long-term solutions in the development of prototypes, using multiple technologies to evaluate which best suit the needs of the state. Overall requirements and features are to be defined based on the suggestions from various stakeholders. MD THINK is a cloud-based technology platform to revolutionize Maryland’s delivery of human services. MD THINK will integrate data systems at DHS, DLLR, the Department of Juvenile Services, the Maryland Health Benefit Exchange, and the Department of Health in order to break down silos and improve service delivery. Currently, these agencies all have their own systems, housing disconnected yet overlapping in information. MD THINK represents the largest Information Technology project in the history of Maryland. This modern “client-centric”

integrated platform will provide employees, partner providers, and constituents of Maryland's human services agencies an efficient and effective platform for delivering collaborative services. A web and mobile front end will provide a central place to access any service from any participating agency. MD THINK's projected implementation date is December 2018.

The WIOA partners intend to replace the multiple, existing systems, shown above, with the new system. This platform for this new system will be adaptable across multiple Maryland State agencies. All require a system with similar attributes: a flexible, robust case management platform with safeguarding of Personally Identifiable Information, and a comprehensive, adaptable rules engine. It is intended that the MWE will be integrated into this common infrastructure platform for use. Long term, the application solution for the consolidated WIOA management system is to be utilized across the WIOA System.

In the short-term, the WIOA leadership team is very committed to working together to address data alignment and information sharing concerns through the following methods:

- Creating an inventory of data that is collected, by WIOA program, to determine which data elements (SSN, demographic data, etc.) would be helpful to partner WIOA organizations for eligibility purposes, etc.;
- Establishing MOUs between WIOA agencies, when applicable;
- Developing one standard confidentiality/ethics form for use with all personnel within the WIOA system to ensure staff understand, and agree with signature, to their responsibilities related to safeguarding confidential WIOA records;
- Developing one standard waiver for use with customers at first touch within the WIOA system to ensure compliance with applicable state and federal laws (e.g.: Family Educational Rights and Privacy Act (FERPA); Health Insurance Portability and Accountability Act (HIPPA); etc.);
- Granting "read-only" basic access, with the appropriate releases, to limited WIOA system staff;
- Recognizing that if a WIOA partner agency has verified eligibility documentation, then the same documentation does not need to be duplicated by another state agency for a common customer; and
- Expanding partner access to the MWE system to a read-only level requires a team approach, where agencies must triage clients in order to properly enroll them and provide the most appropriate services.

**(ii) Describe the state's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan.**

In the long term, DHS is leading the creation of a long-term solution to sharing information between partners. MD THINK is a cloud-based technology platform to revolutionize Maryland's delivery of human services. MD THINK will integrate data systems at DHS, DLLR, the Department of Juvenile Services, the Maryland Health Benefit Exchange, and the Department of Health in order to break down silos and improve service delivery. Currently, these agencies all have their own systems, housing disconnected yet overlapping in information. MD THINK represents the largest Information Technology project in the history of Maryland. This modern

“client-centric” integrated platform will provide employees, partner providers, and constituents of Maryland’s human services agencies an efficient and effective platform for delivering collaborative services. A web and mobile front end will provide a central place to access any service from any participating agency. MD THINK’s projected implementation date is December 2018.

Until then, in the short term, DLLR is expanding partner access to the MWE system to a read-only level, which requires a team approach, where agencies must triage clients in order to properly enroll them and provide the most appropriate services. Currently, Personally Identifiable Information (PII), including Social Security Number, disability status, etc., are stored and protected through MWE, where partners can only see information that is pertinent to their work. Additionally, limited read-only confidential UI information can be viewed through the MWE system and must be protected accordingly. MWE is a secure platform to protect the confidentiality of customers. As access to the MWE is expanded, client protections are central to determining appropriate partner security level. Each partner contact should only be granted access to data, forms, and reports relevant to their programs and those services offered by those programs, but they cannot edit, change, or add data or case notes to the MWE system.

(iii) Explain how the state board will assist the governor in aligning technology and data systems across required AJC partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals.

The GWDB will establish a Data-Driven Technology Standing Committee to assist the Governor in aligning technology and data systems. The committee will report on high-level, cross-system indicators that are aligned with Maryland’s vision and connection to state data. The committee will analyze, develop, and advise on strategies that support the state workforce system.

(iv) Describe the state’s plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2)).

#### *Interoperability of Maryland’s WIOA Management Information Systems*

Once integrated, the WIOA partners will be able to effectively use the WIOA management system to assess the progress of participants exiting from core programs and completing post-secondary education or entering into or retaining employment. The modernized WIOA management system will provide a common data infrastructure from which ad hoc and automatically generated reports may be produced. Once established, this system will provide the ability to flexibly analyze and visualize data across the WIOA system, either in a consolidated fashion or using system specific data. Analysts will have the ability to quickly explore data through easily customized visualization tools. This allows for a drag and drop type interface, which would eliminate the need for hard coding when generating a new report or changing an existing report.

Until then, in order to collect the participant level data that will be aggregated and displayed in USDOL quarterly reports, Maryland will use a standardized individual record file for program

participants, called the WIOA Joint Participant Individual Record Layout (PIRL). The PIRL provides a standardized set of data elements, definitions, and reporting instructions that will be used to describe the characteristics, activities, and outcomes of WIOA participants. Maryland will be able to meet USDOL requirements to collect participant information that corresponds with the data elements and descriptions delineated within the PIRL. Once collected, this information will then be aggregated according to the conditions outlined in the WIOA Data Element Specifications, which detail the common data elements and technical specifications necessary for calculation of reporting elements under all the USDOL programs listed in the paragraph below. Once aggregated, Maryland will submit the outcomes of the PIRL data to USDOL, which will be displayed according to the frameworks within the USDOL Performance Scorecard and the WIOA Pay-for-Performance Scorecard. Each program mentioned in the supporting statement will generate a program specific report that mirrors the construct of the USDOL Performance Scorecard. The Job Openings Report collects data on individuals who receive core employment and workforce information services through the public labor exchange of the state's workforce delivery system under the Wagner-Peyser Program. This report is also included in the state's collection request.

Additionally, to meet USDOL requirements, Maryland will certify and submit the USDOL Performance Scorecard to USDOL on a quarterly basis and will submit the Pay-for-Performance report(s) and Job Openings report quarterly, when applicable. The accuracy, reliability, and comparability of program reports submitted by Maryland using federal funds are fundamental elements of good public administration, and are necessary tools for maintaining and demonstrating system integrity. The use of a standard set of data elements, definitions, and specifications at all levels of the workforce system helps improve the quality of the performance information that Maryland reports on its WIOA programs. The set of common performance measures represents the key results that Maryland strives to achieve for their customers, and that the WIOA federal oversight agencies, like USDOL are interested in measuring. Using this set of common indicators affords ETA the ability to describe, in a similar manner, the core purposes of the workforce system – through the program services received, how many people obtained jobs; their earnings; and what skill gains they achieved. They are an integral part of Maryland's WIOA performance accountability system, and through the Workforce Performance Accountability, Information, and Reporting System, Maryland will continue to collect and report data on program activities, participants, and outcomes that are necessary for program management and to convey complete and accurate information on the performance of workforce programs to policymakers and stakeholders.

Section 116(d)(1) of WIOA mandates that the United States Secretaries of Labor and Education develop a template for performance reports to be used by states, Local Boards, and eligible providers of training services for reporting on outcomes achieved by participants in the WIOA core programs. Required annual data for the core programs include those related to primary performance indicators, participant counts and costs, and barriers to employment. Once Maryland receives these templates from its federal agency partners, it will work to ensure data are collected and reported in a timely and accurate manner.

The WIOA partners are dedicated to provide their staff with additional training regarding performance reporting to ensure proficiency. Sec. 506(b)(1) of WIOA states that section 116 of

WIOA will go into effect at the start of the second full PY after the date WIOA was enacted. WIOA was enacted on July 22, 2014. Therefore, Section 116's performance accountability system is effective July 1, 2016. Approval of this information collection is required so that the states, grantees, and other entities can begin programming their management information systems in order to allow for collection of the necessary data to implement the data collection and reporting requirements of Section 116 in accordance with the WIOA statute. DORS monitors performance on an ongoing basis. DORS staff have access to AWARE VR standardized performance reports on an ongoing basis through weekly, monthly, quarterly, and annual reports. Performance is monitored regularly to ensure progress toward the achievement of performance goals. Additionally, Alliance Enterprises has been working with Maryland DORS and other VR agencies to develop new data reporting elements in accordance with WIOA common performance measures. As Alliance Enterprises updates AWARE, DORS will ensure that staff are provided necessary training. Also, DORS staff will continue to work with its workforce partners toward implementing WIOA common performance measures.

*Planning Note: states should be aware that Section 116(i)(1) requires the core programs, local boards, and chief elected officials to establish and operate a fiscal and management accountability information system based on guidelines established by the Secretaries of Labor and Education. Separately, the Departments of Labor and Education anticipate working with states to inform future guidance and possible information collection(s) on these accountability systems. States should begin laying the groundwork for these fiscal and management accountability requirements, recognizing that adjustments to meet the elements above may provide opportunity or have impact on such a fiscal and management accountability system.*

(B) Assessment of Participants' Post-Program Success. Describe how lead state agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.

Through WIOA and the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), Congress requires states to track participants' post-program success using a series of measures. For the WIOA Title I Adult and Dislocated Worker Programs, Title II Adult Education and Literacy programs, Title III Wagner-Peyser employment services, and Title IV VR, the primary indicators of performance are, as follows:

- Employment during 2nd quarter after exit
- Employment during 4th quarter after exit
- Median earnings
- Credential attainment rate
- Measurable skills gain
- Effectiveness in serving employers

For the WIOA Title I Youth program, the primary indicators of performance are, as follows:

- Employment, education, or training during 2nd quarter after exit
- Employment, education, or training during 4th quarter after exit
- Median earnings

- Credential attainment rate
- Measurable skills gain
- Effectiveness in serving employers

For the TANF Program, the primary indicator of performance, based on PRWORA requirements, is the WPR. The WPR is a measurement of families getting TANF cash assistance that include an adult “engaged in work”—that is, participating in a qualifying work-related activity for a sufficient number of hours per week. Maryland is fully committed to tracking these mandated outcomes, but recognizes that the WIOA system’s mark of success goes beyond these measures. Utilizing the technical assistance provided to Maryland through its participation in the U.S. Department of Health and Human Services’ Systems to Family Stability National Policy Academy, the WIOA partners have worked collaboratively to determine how best to measure success. As Maryland seeks to strengthen and enhance its workforce system through implementation of the State Plan, success requires a commitment to innovation, collaboration, and a true systems approach among the state’s many workforce partners.

In order to guide the WIOA partners in this work, the Benchmarks of Success for Maryland’s workforce system will set forth a clear vision, goals, and measurable achievements that help define success and lay the core foundation of this new system. In keeping with Maryland’s commitment to place “people before performance,” these goals and corresponding benchmarks will be focused around a central vision of increasing the earning capacity of Marylanders by maximizing access to employment, skills and credentialing, life management skills, and supportive services. These goals and benchmarks are not mere measures, but rather provide a way of thinking systematically about how Maryland delivers services. They reflect Maryland’s dedication to focusing its efforts on people who need the system’s assistance the most. The strategic goals and coinciding benchmarks, which are currently undergoing a collaborative vetting process, will intentionally set a high bar and are meant to be used as a leadership tool, guiding strategic conversations and defining a set of achievements for the workforce system to commit to and strive toward in the collective work to improve the lives of Marylanders. To be clear, the intention of these benchmarks is not to be punitive; but rather, to be forward thinking about what success really means in Maryland. The benchmarks will allow the WIOA partners to collectively measure success, as defined by Maryland, beyond what Congress requires. The WIOA partners are committed to using these goals and benchmarks as leadership tools to propel Maryland forward in its work to put “people before performance.”

Further, the WIOA partners are committed to driving resources, services, and collaboration towards strategies that will effectively and efficiently push the system to make progress in reaching its goals. The WIOA Alignment Group will work with the WIOA Work Groups to find ways to effectively measure and strategize how best to meet these benchmarks across the system. Additionally, the WIOA Alignment Group will continually revisit these benchmarks to gauge progress and to determine whether additional measures should be tracked.

**(C) Use of UI Wage Record Data. Explain how the state will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and Labor Market Information, consistent with federal and state law. (This Operational Planning element applies to core programs.)**

### *Use of UI Data*

Under WIOA, UI wage records will continue to serve as the primary source for all employment related performance measures. To guarantee that Maryland is seeing a full and accurate picture of the impact its WIOA programs have on participants' employment outcomes, the state plans to use supplemental wage record data to document participants' entry and retention in employment when wage records are unavailable. Although a majority of employment situations will be covered by wage records, certain other types of employment, particularly self-employment, are either excluded from UI wage records, or remain difficult to gain access to due to restrictions related to confidentiality. WIOA partners take the responsibilities of privacy and confidentiality very seriously. Therefore, the WIOA partners are dedicated to ensuring that staff who access and review UI wage records sign appropriate confidentiality and ethical disclosures every six months.

### *Fiscal Management and Accountability System*

All of Maryland's WIOA programs use the Financial Management Information System (FMIS) for fiscal and management accountability information. FMIS is an integrated database system with purchasing and accounting components. FMIS runs on the Comptroller of Maryland's Annapolis Data Center's computers, and supports individual agency and statewide purchasing and accounting operations.

FMIS supports purchasing functions through the Advanced Purchasing and Inventory Control System (ADPICS) component, and supports the accounting operations through the Relational Standard Accounting and Reporting System (R\*STARS) component. The integration of procurement and accounting processing within FMIS results in two primary agencies, the Department of Information Technology (DoIT) and the Comptroller of Maryland, having responsibility for separate aspects of FMIS. Specifically, DoIT is responsible for daily FMIS administration, including maintenance, operation, security, and backup of related database records and the computer programs that perform online and overnight processing. The Comptroller of Maryland's General Accounting Division (GAD) is primarily responsible for R\*STARS operations, security, and reporting.

(D) **Privacy Safeguards.** Describe the privacy safeguards incorporated in the state's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable federal laws.

#### *Privacy Safeguards*

To protect Personally Identifiable Information (PII), Maryland adheres to USDOL guidance provided in Training and Employment Guidance Letter 39-11, "Guidance on the Handling and Protection of PII." Whenever possible, Maryland will continue to use unique identifiers for participant tracking instead of Social Security Numbers (SSNs). While SSNs may initially be required for performance tracking purposes, staff may use a unique identifier to link each individual record back to the SSN. Once the SSN is entered for performance tracking, the unique identifier may be used in place of the SSN for tracking purposes. When SSNs are used for tracking purposes, Maryland requires its WIOA programs to store or display SSNs in a way that is not attributable to any particular individual. For Maryland's WIOA programs using the MWE,

the state subsequently uses alternative identifiers, such as state IDs, after SSNs have initially been supplied. When SSNs are used, this information is truncated and encrypted within the MWE. Only WIOA staff with selective privileges can access SSNs. To secure the System Internet communications within the MWE, a Secure Sockets Layer (SSL) is used to encrypt a session between the server and the web user. SSL is a program layer for managing the security of message transmissions in a network. The programming for maintaining data confidentiality is contained in a program layer between an application such as the System and the Internet's Transmission Control Protocol / Internet Protocol (TCP/IP) layers. The "sockets" part of the term refers to the socket method of passing data back and forth between a client and a server program in a network or between program layers in the same computer. SSL uses the public-and-private key encryption system from RSA. A digital certificate is an electronic "credit card" that establishes credentials when carrying out transactions on the web, and is issued by a certification authority. It contains a copy of the certificate holder's public key, which is used for encrypting and decrypting messages and digital signatures, and the digital signature of the certificate-issuing authority. This is used so that a recipient can verify the certificate is real. The following data will always be encrypted when it is accessed by the MWE System:

- Social Security Number,
- Federal Employer Identifier Number,
- Wage Records,
- Identifying information (including LEP and disability status),
- Information relating to benefits and public assistance received, and
- User ID and Password.

The MWE system includes a set of permissions that determine the resources in the system that a specific user can access and/or modify. For example, some staff will be able to only view certain data while others will be able to view and modify this data. When MWE's creator, Geographic Solutions, hosts the System, the data is secured behind the advanced firewall. In addition, DLLR's current policy on PII recommends that SSNs are obtained for performance and reporting purposes, but it also states that SSNs are not required for services to be provided. Because SSNs are important for tracking outcomes, staff should seek SSNs, and in doing so, should communicate the following to customers:

- You are not required to provide us with your SSN. Your receipt of services will not be affected by disclosure or nondisclosure of your SSN or any other information that is voluntarily requested.
- SSNs are used to facilitate efficient recordkeeping, integrated service delivery, performance measurement, research, planning, and program evaluation.
- Your SSN will be kept confidential and is intended for use only by the program administrator and the federal government for reporting and evaluation.

Due to privacy concerns among Local Areas and DLLR, Maryland recently formed a workgroup to assess current policy related to privacy and to work with the federal oversight agencies, like USDOL, to determine alternative methods of tracking that do not require staff to collect PII. The desired goal is to obtain accurate eligibility documentation while reducing paper case files. Utilization of a module within the MWE will allow all eligibility information and supporting

documentation to be scanned and uploaded to the MWE eliminating the need for a paper file. Though this option is still in the planning stages, with further discussion around partner access to MWE and data sharing to come, the DLLR workgroup believes that the adoption of a form in the style of a United States Citizenship and Immigration Services Form I-9 is preferable to the maintenance of a paper case file for each workforce participant. The form would require the attestation of the program participant and the applicable WIOA partner case worker that the information provided on the form is correct and complete. In such a case, the supporting documentation will no longer need to be secured by the partner agency. Thus, documents containing PII will be limited to the information that has been attested to by both the customer and the case worker. While such a form has been created by the DLLR work group, it has yet to be shared by the partners. Once a document is agreed to by the WIOA partners, DLLR is committed to piloting a program that integrates the I-9 type form into the intake process. The pilot will allow agencies and WIOA partners to establish a baseline in determination of an acceptable error rate. Upon successful completion of the pilot, and upon agreement among the WIOA partners, an I-9 based form will be integrated as a part of the intake process until information can be securely uploaded onto the MWE and/or partner systems and information can be successfully shared between the partners.

### *III(b)(7) Priority of Service for Veterans.*

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the JVSGs (JVSG) program, Disabled Veterans' Outreach Program (DVOP) specialist.

Men and women who have served in the U.S. armed forces or who have been the spouses of service members have made significant sacrifices on behalf of the United States. In recognition of their service, and in accordance with the WIOA, the Jobs for Veterans Act of 2002<sup>xxxii</sup> and the Veterans' Benefits, Healthcare, and Information Technology Act of 2006<sup>xxxiii</sup>, Maryland is committed to prioritizing services to Veterans and spouses who meet the criteria for "covered persons." Maryland's workforce system must ensure that members of this population have access to services that enable them to qualify for, find, and keep good civilian jobs in occupations with career pathways.

The table below provides criteria for determining whether an individual meets the WIOA definition for a "covered person."

Definition for "Covered Persons"	
Veterans	Spouses of Veterans
Veterans who have served at least one day in the active military, naval, or air service, who were discharged or released from service under any condition other than a condition classified as dishonorable, and who are otherwise eligible for participation in programming are included as covered	An "eligible spouse" means a spouse of any of the following: <ol style="list-style-type: none"> <li>A spouse of any veteran who died of a service-connected disability;</li> <li>A spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is</li> </ol>

Definition for “Covered Persons”	
Veterans	Spouses of Veterans
persons. This definition includes Reserve units and National Guard units activated for Federal Service. <sup>xxxiii</sup>	<p>listed in one or more of the following categories and has been so listed for a total of more than 90 days;</p> <ul style="list-style-type: none"> <li>i. Missing in action;</li> <li>ii. Captured in the line of duty by a hostile force; or</li> <li>iii. Forcibly detained or interned in the line of duty by a foreign government or power.</li> </ul> <p>c. A spouse of any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or</p> <p>d. A spouse of any veteran who died while a disability was in existence.</p>

*Table 31: Veteran Services Eligibility – Definition of a “Covered Person”*

For universal access programs, such as Wagner-Peyser, covered persons must receive Priority of Service over all other program participants. However, for programs with specific eligibility criteria, such as the WIOA Title I Adult program, covered persons must first meet all statutory eligibility requirements of the program to receive Priority of Service.

Priority of service for the WIOA Title I Adult Program must be provided in the following order:

- First Priority: Veterans and eligible spouses who are also low-income, recipients of public assistance and/or basic skills deficient;
- Second Priority: Individuals who are not veterans or eligible spouses, but meet criteria to be considered a target population;
- Third Priority: Veterans and eligible spouses who did not meet "first priority" conditions;
- Fourth Priority: Individuals who are not veterans and do not meet other target population criteria.

For programs that target specific populations without statutory mandate, covered persons must receive the highest priority for enrollment, consistent with the priority of service applied to universal access programs. State and local operators do not have the discretion to establish further priorities within the overall Priority of Service; this right is reserved for the United States Secretary of Labor only. Local Area directors must ensure that local WIOA plans incorporate a Veterans Priority of Service policy that is consistent with the requirements of State policy and the law.

#### *Identifying Veteran Status*

Each AJC, or other relevant point of entry, should inform covered persons, that by identifying as a Veteran or covered spouse, they are entitled to Priority of Service. One of the responsibilities

of the Local Veterans' Employment Representatives (LVERs) are to ensure that signage and detailed sign-in sheets exist at point of entry. The workforce system and affiliate program operators must enable Veterans and eligible spouses to identify themselves as Veterans at the point of entry to the system or program, so that covered persons can take full advantage of Priority of Service.

AJCs and affiliate program operators must ensure that covered Veterans and eligible spouses are made aware of:

- Priority of Service entitlement;
- The full array of employment training and placement services available;
- Applicable eligibility requirements for programs and services.

#### *Verifying Veteran Status*

Any individual self-identifying as a covered person should be provided immediate priority in the delivery of employment and training services. No covered person should be denied access on a priority basis to any services provided by program staff in order to verify covered person status. The only services that require eligibility verification are those that involve the use of outside resources, such as classroom training. For example, to receive training services under WIOA Title I programs, veteran status must be verified. Even in these instances, verification is only necessary where a decision is made to commit outside resources to a covered person over another individual. For all other purposes, covered persons should be enrolled and provided immediate priority before providing verification as a covered person. It is neither necessary nor appropriate for any staff to require verification of the status of a Veteran or eligible spouse at the point of entry, unless the individual who self-identifies as a covered Veteran or eligible spouse:

1. Is to immediately undergo eligibility determination and must be registered or enrolled in a program; or,
2. The applicable federal program rules require verification of covered Veteran or eligible spouse status at that time.

To receive Priority of Service for career services, covered persons may self-attest their Veteran or eligible spouse status. To receive training services under WIOA, however, Veteran status must be verified.

#### *Implementing Priority of Service*

The regulations provide that priority of service means the right of eligible covered persons to take precedence over eligible non-covered persons in obtaining services. The regulations further specify that taking precedence may mean:

- The covered person receives access to the service or resource earlier in time than the non-covered person; or
- If the service or resource is limited, the covered person receives access to the service or resource instead of or before the non-covered person.

The regulations specify how priority of service is to be applied across three different types of qualified job training programs:

- Universal access programs that do not target specific groups;
- Discretionary targeting programs that focus on certain groups but are not mandated to serve target group members before other eligible individuals; and,
- Statutory targeting programs that are mandated by federal law to provide priority or preference to certain groups.

#### *Monitoring Compliance with Priority of Service*

DOL will monitor recipients of funds for qualified job training programs to ensure that covered persons are made aware of and provided priority of service. Monitoring will be performed jointly by the Veterans' Employment and Training Service (VETS), the USDOL agency responsible for administering the program, and the Regional Local Veterans Employment Representative (RLVER).

The following will be used to measure compliance:

- The ratio of veterans referred to employment and WIOA services versus non-veteran clients
- The ratio of veterans referred and accepted to WIOA training versus non-veterans
- Are veterans priority of service signage easily seen near entrance
- Are front desk personnel fully versed on veteran priority of service

If monitoring identifies non-compliance with priority of service, the results of the monitoring:

1. Will be handled in accord with each program's compliance review procedures; and,
2. May lead to imposition of a corrective action plan.

#### *Referral Process for Veterans Determined to Have Significant Barriers to Employment*

The USDOL's Employment and Training Administration anticipates that approximately 30 percent of veterans seeking AJC services nationwide will be identified as having a significant barrier to employment (SBE). This guidance is designed to assist DVOP specialists in targeting services to eligible veterans and spouses who meet criteria for SBE status in order to fulfill their primary responsibility to provide intensive services to this population.

An eligible veteran or eligible spouse is determined to have an SBE if he or she attests to belonging to at least one of the six criteria below:

1. A special disabled or disabled veteran, defined as a veteran who is -
  - entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans' Affairs; or,

- was discharged or released from active duty because of a service connected disability.<sup>xxxiv</sup>
2. Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a));
  3. A recently-separated service member, as defined in 38 U.S.C § 4211(6), who at any point in the previous 12 months has been unemployed for 27 or more consecutive weeks;
  4. An offender, as defined by WIA Section 101(27), who has been released from incarceration within the last 12 months;
  5. Lacking a high school diploma or equivalent certificate; or
  6. Low-income (as defined by WIA at Sec. 101(25)(B)).

An eligible veteran or eligible spouse who is identified as having a SBE must be immediately referred to a DVOP specialist or, in instances where a DVOP specialist is not available, a Wagner-Peyser job service specialists is responsible for providing services.

Additionally, under 38 U.S.C. 4103A(a)(1)(C), the Secretary may choose to prioritize other categories of veterans and eligible spouses who may receive intensive services from DVOP specialists. Any additional priorities will be set forth in separate guidance. The Secretary regularly reassesses the definition to ensure it reflects the best available data and trends associated with veteran employment and continues to identify those veterans who are to be given priority and maximum emphasis for DVOP services under 38 U.S.C. 4103A(a).

Veterans who do not fall into one of the categories targeted for services by DVOP specialists remain eligible for services under WIOA Title I for adults, dislocated workers, and youth, WIOA Title III for employment services under the Wagner-Peyser program.

**(8) Addressing the Accessibility of the AJC Delivery System for Individuals with Disabilities.** Describe how the AJC delivery system (including AJC center operators and the AJC delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) with regard to the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the state's AJC center certification policy, particularly the accessibility criteria.

#### *WIOA System Accessibility for All Marylanders*

Maryland's WIOA oversight entities are committed to ensuring that individuals with disabilities have equal access to all WIOA covered programs and activities. The State of Maryland will ensure that sub-recipients establish and implement appropriate procedures and processes under the Americans with Disabilities Act (ADA) and Rehabilitation Act -Title IV. The State of Maryland has taken necessary steps to identify compliance under Section 188 of WIOA, which contains provisions identical to those in Section 188 of WIA, as well as 29 CFR Part 38, which is similar to 29 CFR Part 37. Additionally, the state will ensure that all Local Areas comply with provisions that prohibit discrimination against individuals who apply to, participate in, work for, or come into contact with programs and activities that receive financial assistance from USDOL, United States Department of Education, and the U.S. Department of Health and Human Services. Section 188 of WIOA 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 LEP), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I-financially assisted program or activity. Section 188 also requires that reasonable accommodations be provided to eligible individuals with disabilities. AJCs are expected to meet the needs of their customers by ensuring universal access to their programs and activities for all eligible individuals. Universal access includes performance of the following functions:

- Understanding local needs;
- Marketing and outreach;
- Involving community groups and schools;
- Effecting collaboration, including partnerships and linkages;
- Staff training;
- Intake, registration and orientation;
- Assessments and screening; and
- Service delivery.

Maryland's AJCs are required to provide reasonable accommodation for individuals with disabilities to ensure equal access and opportunity. The term "reasonable accommodation" is defined as "modifications or adjustments to an application/registration process that enables a qualified applicant/registrant with a disability to be considered for the aid, benefits, services, training or employment that the qualified applicant/registrant desires;" or "modifications or adjustments that enable a qualified individual with a disability to perform the essential functions of a job, or receive aid, benefits, services, or training equal to that provided to qualified individuals without disabilities," or "modifications or adjustments that enable a qualified individual with a disability to enjoy the same benefits and privileges of the aid." AJC will make visible to participants that:

- Section 188 implements the nondiscrimination and equal opportunity provisions of WIOA, which are contained in Section 188 of the statute.
- Section 188 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 LEP), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I-financially assisted program or activity.
- Section 188 also requires that reasonable accommodations be provided to qualified individuals with disabilities in certain circumstances.

The state expects local providers to acknowledge in local plans and/or policies that they understand that, while Section 188 regulations ensure equal opportunity for individuals with disabilities, subrecipients may also be subject to the requirements of:

- Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of federal financial assistance;
- 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 on the basis of disability;
- Section 427 of the General Education Provisions Act; and
- Maryland Anti-Discrimination laws.

The Office of Fair Practices (OFP) maintains a current listing of businesses and individuals who interpret, that provide for Braille, and other auxiliary aids and services. Alternate formats including large format copies are made available upon request. The OFP maintains regular contact with the Governor's Office on Individuals with Disabilities for related guidance and technical assistance.

Included in the administrative directives that the OFP has developed and disseminated is a directive, entitled "Alternate Formats", which documents the related policy and procedure and includes a resource list of contacts.

DWDAL maintains contact with organizations and agencies that provide services to and/or advocate on behalf of individuals with disabilities. Through these associations, DLLR receives regular guidance and technical assistance on providing notice and services to individuals with disabilities.

The guidelines for the development and submission of each grant recipient's Local WIOA Plan included the requirement that recipients describe the steps they would take to ensure that communications with individuals with disabilities, including individuals with visual or hearing impairments, are as effective as communications with others.

#### *Monitoring of Sites*

For WIOA programs under DLLR's oversight, in order to confirm compliance under Section 188, DWDAL state Regional Program Monitors will conduct an onsite review. Prior to the commencement of the visit, the Monitor will confirm with the Program Manager or Director that notification of the visit was received, staff are aware, and requested information prior to the visit is unchanged. The Program Monitor will observe the site's triage system, confirm that appropriate federal signs are visible to participants, and examine the kiosk to confirm that appropriate WIOA, Veteran, ITA, and OJT information is available. A site walk-through will determine whether:

- EO Law Posters are in plain sight, centrally located, in needed languages and provide state and local EO Officer contact information;
- WIOA, Veteran, ITA, and OJT Literature are present;
- EO tagline is inserted and correct;
- TTY/TDD or Relay Service number is provided where phone numbers are listed;
- Site is accessible, i.e. ADA compliant;
- Disability entrance signage is present;
- Entrance and parking lot are accessible; and
- There are both Accessible stations and Assistive Technology.

The Monitor will perform a case file review analyzing documentation, intake processes, eligibility determination, and access to services based on the laws under WIOA Title I and Title IV from randomly selected files for the PY. Tests will be performed using the monitoring tools, created by the Monitoring Unit, along with instruments provided by DLLR OFP. A report will be developed highlighting any discrepancies, findings, or concerns that will be forwarded to the Office of Fair Practice and the Office of the Assistant Secretary for further review. The WIOA partners are dedicated to ensuring that subject matter experts in relevant areas, such as disabilities and accessibility, are included in monitoring best practice training and discussions to ensure that WIOA programming is delivered thoroughly and effectively.

DORS self-monitors for compliance with the provisions of the Americans with Disabilities Act to ensure that all offices, programs, services, technology, and materials are fully accessible to staff with disabilities and consumers with significant disabilities. On a daily basis, staff with disabilities and participants in the VR program monitor DORS for accessibility. Monitoring activities are also conducted by the United States Department of Education, Rehabilitation Services Administration, as well as by state and federal auditors.

DHS provides assistance to individuals and families with disabilities applying for or receiving TANF by ensuring equal access to people with disabilities; ensuring that policies, practices, and procedures are modified for people with disabilities where necessary; and ensuring that methods of administration do not discriminate on the basis of disability. Applicants and recipients are provided special accommodations and auxiliary aids such as interpreters for individuals with hearing impairments, large type reading materials for individuals with visual impairments, and telephone interviews for those customers who unable to visit a LDSS. Further, specifically with TANF workforce development programs, DHS requires LDSS to complete an annual Plan for Achieving Self-Sufficiency. Included in the annual plan are project descriptions for all work program activities. In the Plan, LDSS are required to describe their assessment, reasonable accommodation, and monitoring processes which will include a communication strategy with vendors that provide workforce development services, if applicable. Additionally, DHS conducts monthly technical assistance/monitoring calls and annual on-site monitoring visits with each LDSS, which includes evaluation of ADA compliance. Compliance will be measured, among other things, by the promulgation of policies, tracking of requests for reasonable accommodations, and participation in DHS ADA trainings. Finally, monitoring is also conducted by the U.S. Department of Health and Human Services as well as state and federal auditors.

**(9) Addressing the Accessibility of the AJC Delivery System for Individuals who are English Language Learners.** Describe how the AJC delivery system (including AJC center operators and the AJC delivery system partners) will ensure that each AJC center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

English language learners represent a large subset, approximately 49 percent, of the adult education population. Immigrant populations make up approximately 17 percent of Maryland's workforce system. They provide substantial contributions to Maryland's economy every day. In turn, Maryland's workforce system must strive to tailor services for this population as they obtain literacy and high school equivalency, training, and employment services. DLLR raises

awareness of available services at the state's AJCs through oral communication in languages other than English and the distribution of multilingual brochures specifically designed for this community. AJCs display "I Speak" and/or LanguageLine posters, displaying 38 languages for language identification. The state has a contract with LanguageLine to provide phone interpretation in the AJCs. Additionally, this availability of language interpretation is conveyed through the mandatory display of Language Line posters in all AJCs. LanguageLine offers phone interpretation in over 240 languages.

In-person interpretation is a real-time, face-to-face oral interpretation service option that allows customers to receive information in their preferred language with incorporation of "cultural and syntactical context."<sup>xxxv</sup> Service is delivered on site by a certified interpreter. The State of Maryland is contracted with Schreiber Translations, Inc. (Schreiber) to provide written translation services. Local Areas and DUI may access this provider under the state's vendor agreement.

The State of Maryland is contracted with Ad Astra, Inc. (Ad Astra) to provide this service. Local Areas and DUI may access this provider under the state's vendor agreement.

Equal Opportunity posters in languages other than English are displayed in AJCs as well as Babel Notices will be used to provide Equal Opportunity notice to English language learners and LEP individuals. Local Areas should include Babel Notices pursuant to the three percent population stipulation in state law. Census data will be used to determine which languages to include. Increased data collection, including LEP status and preferred language, will allow the Local Areas to develop a baseline of what populations use and require linguistic services. Local Areas will collect this new data by or prior to January 2018. Once this baseline is established, then Local Areas will alter their Babel notices according to the languages most relevant to their areas.

State agencies must have all vital documents translated into any language spoken by a LEP population that constitutes three percent of the overall population within the geographic area. This includes accessibility of vital documents online. The following DWDAL and Division of UI publications are available in Spanish: Pocket Resume for Job Interviews; Services for Migrant and Seasonal Farm Workers, New American Workforce Program; and GED Testing. Additional resources are being reviewed for content and ease of translation. The UI publication "What you need to know about UI in Maryland" is available in Spanish. The Division of UI expects to make available Spanish versions of the Division's web filing platform. Because of the significant number of Spanish speaking claimants seeking services, the College Park UI Claim Center employs Spanish speaking staff that review claims over the phone for claimants from the entire state. The Division's Spanish speaking personnel will also assist with employer inquiries when necessary. DORS currently has its website and written materials available in five non-English languages, including Chinese, French, Korean, Spanish, and Vietnamese. These languages were selected based on Census data as well as customer and advocate request. Upon request, DORS translated documents into other languages. DHS has forms and outreach materials available in Spanish and in English as well as FIA forms to apply for assistance available in Amharic, Arabic, Burmese, Chinese, Farsi, French, Korean, Nepalese, Russian, TIG, Traditional Chinese, and Vietnamese. Concerning DHS' LDSS offices, preferred language of customers is recorded in the client database system. This information is utilized to translate documents before sending them out to customers. Multilingual pay, a program for increased pay, for staff that are fluent in

more than one language and interacts directly with customers acts as an incentive program for LDSS staff. DWDAL will take reasonable action to translate relevant portions of its website to non-English languages, selected based on Census data. DWDAL created a document entitled “Multilingual DWDAL Staff” for internal reference. Additionally, the state is creating a similar list for multilingual Local Area staff in the AJCs.

Furthermore, DLLR’s New Americans Initiative will provide much needed outreach and technical assistance for AJC staff. To ensure high quality services to both jobseekers and businesses, professional development opportunities are currently available and advertised through regular communications from Central Office administration. Under WIOA, through leveraging partnerships, new professional development and training opportunities on topics relevant to all WIOA partners will be available to staff. Providing accessibility to the workforce system for all of Maryland’s jobseekers is central to Maryland’s approach under WIOA.

Maryland’s Nondiscrimination Plan fulfills the requirements of WIOA Section 188 and 29 CFR Part 38. The plan states that it is the policy of the State of Maryland to not discriminate against any 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 LEP), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I-financially assisted program or activity.

According to an August 2016 report by the organization New American Economy<sup>xxxvi</sup>, one in seven Marylanders was born in another country. Therefore, Maryland’s workforce system must meet the needs of English language learners. Currently, DLLR’s OFP is responsible for all overall compliance in regard to equal opportunity and nondiscrimination matters. The OFP provides technical assistance and professional development opportunities. All Local Areas have designated an Equal Opportunity Officer to ensure accessibility of the Local Areas’ AJCs. In addition to the equal opportunity and accommodations training conducted by that office, Maryland is dedicated to ensuring that frontline staff is trained to meet the needs of Maryland’s English language learners.

As the office charged with monitoring for equal opportunity and nondiscrimination compliance, the OFP issued an LEP Plan to provide general guidance to DLLR’s Divisions and Commissions to ensure meaningful access to English language learners.

In response, DWDAL developed the Language Access Plan (LAP). This LAP identifies how the DWDAL and the Division of UI, and the statewide network of AJCs and Title II adult education sites, are working to ensure workforce system access for LEP individuals. Additionally, this LAP is established pursuant to and in accordance with, state Government Article, §§10-1101, Annotated Code of Maryland: “The General Assembly finds that the inability to speak, understand, or read the English language is a barrier that prevents access to public services provided by state departments, agencies, and programs, and that the public services available through these entities are essential to the welfare of Maryland residents. It is the policy of the state that state departments, agencies, and programs shall provide equal access to public services for individuals with LEP.” Vital documents must be translated into any language spoken by any LEP population that constitutes three percent of the overall population within the geographic area. Additionally, state agencies must provide face-to-face, in-house oral language service if

contact between the agency and individuals with LEP is on a weekly or more frequent basis. DLLR will provide guidance on implementing this code on a state-level and local-level.

Recognizing the detrimental effects of brain waste on the economy as well as the economic hardships of immigrants looking for employment opportunities that align with their professional backgrounds and training, Maryland submitted a Letter of Interest (LOI) to the White House National Skills and Credential Institute in 2016. The LOI identified four key barriers to the integration of skilled immigrants in Maryland's workforce, including LEP, complex licensing and credentialing processes, limited experience of Maryland's workforce system in working with foreign-born individuals, and lack of social capital on the part of immigrants. The Maryland Skilled Immigrant Task Force (Task Force) was created in June 2016 to address these issues, believing that the State of Maryland could lead the way in creating a win-win environment in which immigrants secure jobs that match their professional and educational backgrounds while simultaneously meeting the hiring demands of the business community. The Task Force includes representation from national programs, state agencies, local workforce development corporations, community colleges, and service providers.

Maryland additionally seeks to enhance services to and remove barriers for English language learners through several grant and technical assistance opportunities. First, Maryland has been chosen as one of eight U.S. localities to receive customized technical assistance from WES Global Talent Bridge to advance its skilled immigrant integration efforts. Each of the eight pilot communities will receive 12 hours of coaching and advising provided by WES Global Talent Bridge; 12 hours of additional customized technical assistance from national experts; and four interactive web-based training sessions with WES Global Talent Bridge and other national partners on topics related to immigrant professional integration. As part of the pilot group, each community will participate in monthly calls with WES Global Talent Bridge and participating communities to share ideas and provide updates on the progress of local efforts. Maryland also hopes to learn engagement strategies that will grow the Skilled Immigrant Task Force. Second, DLLR is a member of the National Occupational Licensing Learning Consortium, a peer learning consortium on occupational licensing policies. This selective group will implement actions to remove barriers to labor market entry and improve professional licensing portability and reciprocity. Member states will identify areas within their individual policies that may impede entry for populations most burdened by those policies. Further, they will examine potential solutions to reduce related barriers. These populations include skilled immigrants, people with criminal records, active duty military, veterans and their spouses, and unemployed and dislocated workers. Through policy issuances and monitoring, the state workforce system will ensure that the needs of English language learners will be met.

**V. COMMON ASSURANCES (for all core programs) The Unified or Combined State Plan must include assurances that:**

1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;
2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;

3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;
  - (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required AJC partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public;
  - (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the UI Agency if such official(s) is a member of the State Board;
4. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;
5. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor Local Areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);
6. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;
7. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;
8. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;
9. The State has a AJC certification policy that ensures the physical and programmatic accessibility of all AJC centers with the Americans with Disabilities Act of 1990 (ADA);
10. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and
11. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.

## **VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS**

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

**Adult, Dislocated Worker, and Youth Activities under Title I-B.** The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B—

(a) General Requirements

(1) *Regions and Local Areas.*

(A) Identify the regions and the Local Areas designated in the State.

*Maryland's Planning Regions*

Regional planning is a new requirement under Section 106 of WIOA. The Act requires the State to identify planning regions as a part of the process for developing the State plan. Maryland's twelve (12) Local Areas have historically entered into agreements wherein they developed regions and produced plans to regionally target various industry sectors. Maryland's workforce areas include: Anne Arundel County, Montgomery County, Baltimore City, Prince George's, County, Baltimore County, Southern Maryland, Frederick County, Susquehanna, Lower Shore, Upper Shore, Mid-Maryland, Western Maryland.

Based on a variety of considerations described in the next section of this plan, the State has designating regions, as follows:

- Western - The Western region is comprised of the Western Maryland Local Area. This Local Area is comprised of Maryland's three most western counties: Garrett, Allegany, and Washington.
- Capital - The Capital region includes three Local Areas: Prince George's, Montgomery and Frederick. All three are located along the Washington, D.C. corridor.
- Central - The Central region is comprised of five Local Areas: Anne Arundel, Mid-Maryland, Baltimore County, Baltimore City, and Susquehanna.
- Southern - The Southern region is comprised of the Southern Maryland Local Area. That Local Area is comprised of Calvert, Saint Mary's, and Charles Counties.
- Eastern Shore - The Eastern Shore region is comprised of two Local Areas: Upper Shore and Lower Shore.

(B) Describe the process used for designating Local Areas, including procedures for determining whether the Local Area met the criteria for "performed successfully" and "sustained fiscal integrity" in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

#### *Process for Determining Regions*

The State of Maryland convened a group of stakeholders as a part of its nine (9) WIOA workgroups to examine proposed methodology in delineating regions pursuant to Section 106 of WIOA. That group, consisting of the DLLR, economists, and local workforce development directors collaboratively reviewed the list of variables that could be used to delineate regions of economic activity pursuant to Section 679.210 of the Notice of Proposed Rulemaking issued by USDOL on April 16, 2015.

The Executive Director of the GWDB contacted Maryland's chief elected officials explaining the statutory requirements regarding regional planning in July 2015.

In October 2015, the WIOA workgroup on Labor Market Information distributed, for public review, a list of draft variables that the State proposed to use for delineating regions. The DLLR led workgroup proposed the use of a similarity index that would include Local Areas with similar or shared labor markets, shared common economic development areas, and adequate

possession of federal and non-federal resources to ensure that a proposed region would have appropriate education and training institutions. The State considered the following additional variables:

- Population centers
- Commuting patterns
- Land ownership
- Industrial composition
- Location quotients
- Labor force conditions
- Geographic boundaries

After allowing for adequate public comment, three (3) draft maps incorporating the variables were circulated for public inspection, review, and comment. After consultation with the Maryland's twelve (12) local workforce directors, the department issued a fourth map for review and comment. The Workforce Investment Network of Maryland (WIN), comprised of the State's twelve Local Area executive directors, ultimately agreed to the designation of areas listed above. That designation was consistent with commuting patterns, industrial composition and previous collaborations that the Local Areas engaged in in the past.

#### *Functions of the Planning Regions*

Pursuant to Section 106 of WIOA, Local Boards and chief elected officials must engage in a regional planning process. That process must result in the preparation of regional plan. The regional plan must incorporate the local plans for each of the Local Areas in the planning region and must be aligned with Maryland's State Plan. Maryland, pursuant to Section 106 of WIOA, will provide technical assistance and Labor Market Information upon the request of a Local Area to assist with regional planning. Pursuant to Section 106 of WIOA, each regional plan shall collaboratively engage in a process that results in:

- The establishment of regional service strategies, including use of cooperative service delivery agreements
- The development and implementation of sector initiatives for in-demand industry sectors or occupations for the region
- The collection and analysis of regional labor market data, in conjunction with the State
- The establishment of administrative cost arrangements, including the pooling of funds for administrative costs, as appropriate, for the region
- The coordination of transportation and other supportive services, as appropriate, for the region
- The coordination of services with regional economic development services and providers
- The establishment of an agreement regarding collective negotiation with the State on local levels of performance, and report on performance accountability measures for Local Areas or the planning region as set forth in Section 116(c) of WIOA.

#### *Subsequent Designation of Regions*

Upon request of the chief elected officials from the Local Areas affected, or every two years beginning July 1, 2016, the State will review the current configuration of regions. Should it be

determined that the regions no longer meet the needs of the State's workforce system, the State will undertake a reconfiguration of the regions in coordination with Maryland's Local Boards and chief elected officials.

#### *Designation and Re-Designation of Local Areas*

Upon request of a chief elected official(s) of a Local Area, the Governor shall approve the re-designation of a Local Area that has performed successfully and sustained fiscal integrity. For the purposes of these measures, Maryland adopts the following definitions:

- *Performed Successfully* -- The term "performance successfully" means the Local Area met or exceeded the adjusted levels of performance for primary indicators of performance described in Section 116(b)(2)(A) (or, if applicable, core indicators of performance described in Section 136(b)(2)(A) of the WIA of 1998) for each of the last two consecutive years for which data are available preceding the determination of performance under this paragraph.
- *Sustained Fiscal Integrity* -- The term "sustained fiscal integrity" means that the Secretary has not made a formal determination, during either of the last two consecutive years preceding the determination regarding such integrity, that the administrative entity of the area misspent funds provided under Subtitle B of WIOA (or, if applicable, Title I of the WIA of 1998) due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration.

Upon receipt of a request from a chief elected official for a particular Local Area to re-designate the Local Area, the Maryland DLLR will conduct a review of the Local Area's performance and fiscal integrity to ensure that it both performed successfully and sustained fiscal integrity. Upon conclusion of the same, the Secretary of the DLLR will recommend to the Governor whether Local Area should be re-designated. By December 2017, Maryland is dedicated to issuing a Policy from the GWDB clearly setting forth the criteria for how a Local Area will be determined as performing successfully and sustaining fiscal integrity. This will ensure that the State will have adequate time to receive guidance from USDOL regarding these important measures.

#### **(C) Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of Local Areas.**

In the event that a unit of general local government (including a combination of such units) is not granted re-designation, or an area is not re-designated as a planning region, the Local Area or region may appeal the decision, pursuant to Section 106(a)(5) of WIOA to the GWDB. In the decision not to re-designate a Local Area or region, the Governor shall temporarily designate the successor for the previously designated Local Area or region. Should the previously designated area or region wish to appeal, such an appeal must be made in writing within 30 days of the Governor's decision not to re-designate either the Local Area or region. If the appeal does not result in a designation of the Local Area or a region, the United States Secretary of Labor, after receiving a request for review from the unit and on determining that the unit was not accorded procedural rights as specified under Section 102(b)(2)(D)(i)(III) of WIOA, or that the area meets the requirements as set forth above, may require the area be designated as a Local Area or region.

The appeal process upon which a Local Area can appeal a designation will be set forth in the Policy from the GWDB on the criteria for how a Local Area will be determined as performing successfully and sustaining fiscal integrity. Again, Maryland is dedicated to developing and issuing that report no later than By December 2017. This will ensure that the State will have adequate time to receive guidance from USDOL regarding these important measures.

**(D) Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.**

On September 14, 2016, the GWDB approved Policy Issuance 2016-09, entitled WIOA MOU and Resource Sharing Agreements (RSAs). The Policy outlines the requirements of a WIOA compliant MOU/RSA, and further outlines the process in which disputes regarding funding are resolved. For purposes of an appeal of a determination regarding the state formula of infrastructure funding, the impasse process outlined in the Policy should be used to resolve the appeal. The impasse process is as follows:

**Impasse Step 1: GWDB Proposes Resolution**

The GWDB Executive Director is responsible for notifying the GWDB Chair that an impasse has been declared. At this point, the GWDB Executive Director and the DLLR-DWDAL Assistant Secretary must provide the GWDB Chair with relevant materials for review, including but not limited to: 1. The completed Dispute Resolution Form; and, 2. DLLR-DWDAL Assistant Secretary's proposed resolution. In turn, the GWDB Chair is responsible for selecting three GWDB members to serve as members of an Impasse Review Team. The Impasse Review Team must investigate the dispute to obtain additional information or to clarify the facts presented. Within fourteen business days of the declaration of impasse, the Impasse Review Team must meet to discuss the dispute with all appropriate state and local partners. After meeting, within seven business days, the Impasse Review Team must provide a written response and dated summary of the proposed resolution to all appropriate Parties. The Local Board Chair (or designee) then must contact the petitioner, the appropriate state and local partners (when a local partner is not the petitioner) and the Local Board (when the Board is not the petitioner) to verify that all appropriate Parties are in agreement with the proposed resolution. The state will consider the dispute to be settled when all partners are in agreement. If the dispute is not resolved within ten business days of receipt of the GWDB Impasse Review Team's written response, then Step 2 of the impasse procedure must be followed.

**Impasse Step 2: Governor Resolves Dispute**

After an impasse has gone through Step 1 and remains unresolved, then it is the responsibility of the GWDB Chair to inform the Governor of the impasse. The Chair must provide the Governor with relevant materials for review, including but not limited to: 1. The completed Dispute Resolution Form; 2. DLLR-DWDAL Assistant Secretary's proposed resolution; and, 3. The GWDB Impasse Review Team's proposed resolution. Upon review, the Governor will determine how the impasse shall be resolved. The Local Board Chair will ensure that all partners are aware of the Governor's decision. In accordance with WIOA, the impasse decision made by the Governor shall be applicable to the Local Area for that PY and for each subsequent PY for which

partners fail to reach such agreement. WIOA Final Rules specify that if the state cannot assist the Local Board in resolving the impasse, the Governor or the GWDB must report the failure to the U.S. Secretary of Labor and to the head of any other federal agency with responsibility for oversight of a partner's program.

#### *Appeal of Infrastructure Funding Determinations*

Pursuant to guidance from USDOL, the specific requirements for the local funding agreements, which are related to how the shared and infrastructure costs of the AJC service delivery system will be paid by the AJC partners, need not be satisfied in the funding agreements for PY16. states and Local Areas may continue to negotiate local funding agreements as they have been doing under WIA for purposes of PY16. However, the local funding agreements must satisfy the requirements of section 121(h) of WIOA for purposes of funding the AJC system in PY17. Therefore, Maryland, pursuant to the Act, will establish a process for an AJC partner administering a program to appeal a determination regarding the portion of funds to be provided through upcoming policy.

#### *(2) Statewide Activities.*

##### **Statewide Policy Activities**

(A) Provide State policies or guidance for the statewide workforce development system and for use of State funds for WIA activities.

Maryland has a robust policy plan in place to guide the state workforce system. Pages 62-67 provide details on Maryland's WIOA policy activities.

#### *(2) Statewide Activities.*

(B) Describe how the state intends to use Governor's set aside funding. Describe how the state will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers

#### *Governor Hogan's WIOA Set Aside Funding*

As required in Section 134 of WIOA, DWDAL has set aside funding for both required (section 134.2) and allowable (section 134.3) Statewide activities. The final determination of the use of available funding for allowable activities is made by the Governor or his designee. DLLR is committed to providing funding opportunities for workforce delivery systems that are innovative and industry-driven. DLLR is particularly interested in providing funding to workforce training opportunities in the industries identified in Governor Hogan's strategic plan. Additionally, in an effort to further align workforce development and apprenticeship opportunities, DLLR is committed to providing funding for apprenticeship opportunities in nontraditional apprenticeship fields.

#### *Rapid Response and Layoff Aversion in Maryland*

In Maryland, Rapid Response is a collaborative effort that involves locally defined partnerships with staff from DLLR DWDAL's Dislocation Services Unit, the Local Areas, the state's

Business Solutions Team, and the DLLR DUI. Rapid Response teams work with both Worker Adjustment and Retraining Notification (WARN) and non-WARN businesses and employees to quickly maximize public and private resources that will minimize the disruptions on companies, affected workers, and communities associated with job loss. Generally, Rapid Response Teams provide customized services onsite at an affected company, accommodate work schedules, and assist companies and workers through the challenging transitions associated with job loss. All Rapid Responses—irrespective of the size of the dislocation event and whether it is a WARN or non-WARN situation—involve: (1) an initial business consultation, which is employer-focused, and (2) an information session, which is employee focused. DWDAL works collaboratively with the Local Areas, the DUI, and other relevant stakeholders to ensure effective, customer-centric Rapid Response provision.

For each Rapid Response event, it is the responsibility of the local Rapid Response team's DLLR Regional Business Solutions Consultant to take the lead in ensuring all relevant parties remain informed throughout the process and all requirements contained in this Policy Issuance are met. The local DLLR Regional Business Solutions Consultant may delegate tasks to any member of the local Rapid Response team so long as all requirements contained within Maryland's Rapid Response policy are met and Rapid Response is effectively delivered.

Once an employer has submitted a Notice of Dislocation, the DSU must complete the Dislocation Event Communication Template for distribution to the relevant Local Rapid Response team(s) across the state. For larger dislocation events involving 25+ impacted workers, the DLLR DSU must also distribute the completed dislocation event notification form en masse to stakeholders beyond the local Rapid Response team, including the DLLR Secretary and the Governor's Office, to raise awareness and leverage additional support.

The local DLLR Regional Business Solutions Consultant (or designee) is responsible for: (1) capturing detail needed for reporting purposes in the MWE; and, (2) managing and coordinating the specific Rapid Response effort with relevant team members to decide:

- What approach should be taken for the initial business consultation?
- Who specifically should participate in the initial business consultation from the local Rapid Response Team and in what capacity?

#### *WARN Protocols*

To ensure quality coordination, DLLR Business Solutions Team and DSU are responsible for sharing WARN information with relevant staff from DWDAL, the affected Local Area(s), the DLLR DUI, and other relevant stakeholders in a timely manner. The Rapid Response team is then responsible for keeping the Local Area well-informed of its anticipated actions, and for contacting the business in a timely manner to explain the importance of Rapid Response services and to determine the business' level of interest.

#### *Non-WARN Protocols*

In the absence of a WARN, a business may contact any member of the Rapid Response team. For example, the business may contact the Local Area directly if it has an existing relationship or

it may contact the DUI to ask specific UI questions. It is the responsibility of the individual who has been contacted to ensure coordination and information sharing between the Rapid Response team occurs timely. In the same way that DWDAL must coordinate with the Local Area(s), DUI, and other stakeholders in WARN situations, the Local Area(s) must coordinate with DWDAL and keep DWDAL well-informed of its anticipated actions in non-WARN situations, as it will be included in reporting to the USDOL.

#### *Initial Business Consultation (Employer Focused)*

The initial business consultation is an opportunity for designated members of the local Rapid Response team to meet with the business to understand employer needs<sup>xxxvii</sup> and provide information regarding the benefits of moving forward with offering an employee-focused Rapid Response Information Session.

In the initial business consultation, the local Rapid Response team should make available to employers:

- Labor market and retraining information;
- On-site UI bulk claim registration;
- Job placement services;
- Job seeking information;
- Referral to retraining opportunities; and,
- Registration of federal trade readjustment services;

The primary goals of the consultation are to: (1) support the business in meeting its needs; and (2) secure the employer's commitment to offer an Information Session geared towards employees. Staff should arrange for initial business consultations on company time at the work site, when appropriate. To gain employer participation and support, the Rapid Response team shall describe the benefits of holding an employee focused information session.

The secondary goal is to obtain information about the impacted workers, so additional services can be planned and implemented appropriately. The Rapid Response team should encourage the employer to provide the following information concerning the affected employees prior to the employee focused Information Session, either by completing the template Impacted Worker Information Form or through other means. Information gained in the initial business consultation would ideally include:

- Salary range for each affected employee;
- Average years of employment;
- Gender and age breakdown;
- Retirees;
- Retirement, pension or severance packages;
- Whether job transfer will be available;
- Educational levels;
- Commuter patterns;
- Literacy issues;
- Whether there is a large English Language Learners population;

- Whether job skills are unique to the employer;
- Whether there is a large number of older workers<sup>xxxviii</sup>; and,
- Whether the company is utilizing an outplacement service for employees.

Prior to an employee-focused Rapid Response event, the designated Rapid Response team should also encourage the business to solicit resumes from affected employees. Staff should gather information concerning the skills and abilities of impacted workers to be used for outreach with local businesses. Staff should use the information learned during a consultation to inform future outreach opportunities and to provide information on business needs.

#### *Information Session (Employee Focused)*

The Information Session is an opportunity for designated members of the Rapid Response team to meet with the impacted workers to:

- Advise the dislocated workers on the transition services that are available via the AJCs and workforce system;
- Explain the basics of the UI benefit system;
- Provide assistance with planning for reemployment services to the labor force;
- Provide assistance with planning for and implementing an on-site displaced worker assistance center;
- Provide financial resources, as available, to assist with a wide range of employment and training services; and
- Offer informational sessions to help reduce worker anxiety and minimize negative impact on the business.

The DUI's involvement will vary based on the size of the dislocation event and staff capacity. For dislocation events impacting 25+ employees, DUI staff must have the capacity to actively participate in the employee-focused information sessions. For smaller dislocation events, the DUI staff will participate as capacity allows.

In these smaller dislocation events where DUI in-person participation is not possible, the Regional Business Solution Consultant from the local Rapid Response team should relay UI information through a standard PowerPoint and provide handouts and DUI contact information, as time permits. If not enough time is permitted to cover any/all UI information, the local Rapid Response team must instead verbally provide DUI's contact information along with handouts of the PowerPoint presentation and other relevant materials.

At the conclusion of the Rapid Response event(s), the Regional Business Solutions Consultant (or designee) should complete the Rapid Response Summary Form and provide the summary to the local Rapid Response Team.

#### *Layoff Aversion and Rapid Response*

Business Service Team members assist eligible businesses with layoff aversion and/or Rapid Response along any given point of a business' lifecycle.

The Business Services Team offers an array of initiatives and strategies that work towards job creation and layoff aversion. As defined by USDOL, layoff aversion is:

- When a worker's job is saved with an existing employer that is at risk of downsizing or closing; or,
- When a worker at risk of dislocation transitions to a new job, with the same employer or a different employer, and experiences no or a minimal break in employment.

Through on going engagement with businesses, field representatives will establish relationships with employers and obtain basic knowledge regarding the company, their needs and processes as well as their well-being. If an employer contacts a field representative and advises them they are struggling, or if the representative suspects difficulties or obtains information suggesting trouble via news articles, current Labor Market Information or other sources, arrangements can be made to work with the employer to take a pro-active approach. Field representatives can assist employers with strategies such as: providing assistance with incumbent worker training or other worker upskilling requirements; funding feasibility studies; connecting companies to business loan programs or other resources; establishing links to economic development activities and assistance; succession planning; proactively identifying opportunities for potential economic transition into other growing industry sectors; cost reduction; process improvement; and connecting businesses to qualified workers.

## **Other Uses of Governor Set Aside Funds**

Innovation requires investment. Since the initial drafting of the State Plan, the WIOA partners have dedicated to providing funding for projects and interventions with the ultimate goal of systems change. As such, the WIOA Alignment Group discussed, in 2017, various proposals that will provide seed funding for Local Areas to innovate and strengthen local partnerships.

### *Career Pathways and Co-Enrollment Demonstration Projects*

Currently, co-enrollment between Title I WIOA Adult, Dislocated Worker and Youth programs and Title II Adult Education and Family Literacy programs is low. As providing career pathways for adult learners is a priority within WIOA and the State Plan, Maryland announced in November 2017 a \$1 million investment in Set Aside Funding for the development of career pathway demonstration projects.

While Maryland has had success in developing career pathway models through MI-BEST and ACE, these programs have since wound down. In response to the solicitation, Local Areas can be awarded up to \$250,000 to utilize the career pathway model in developing a program targeting adult learners. Local Areas were provided a menu of options that could be employed:

- (1) Registered Apprenticeships and pre-apprenticeships,
- (2) Integrated Education and Training,
- (3) Integrated English Literacy and Civics Education,
- (4) English Language Acquisition,
- (5) Out-of-School Youth Pathways,
- (6) Distance Learning,

- (7) Transition Specialist Support, and
- (8) Bridge programming

The Anne E. Casey Foundation provided technical assistance for Local Areas on the subject of career pathways upon the release of the grant. The goal of this funding opportunity is to strengthen relationships and co-enrollment between Title I and Title II entities within a Local Area.

#### *Re-Entry Navigators*

The AJC at Mondawmin Mall is the only designated re-entry center in the state. This is based on the premise that ex-offenders return to Baltimore upon their release. At the same time, correctional education programs are offered throughout the state at various institutions. Before release, inmates take part in Employment Readiness Workshops designed to, among other things, make them aware of the AJCs, help with resume building, etc. However, there is no systematic approach to referring those returning to communities to the AJCs, or to area employers who would hire ex-offenders.

In the first quarter of 2018, the Maryland Workforce System will utilize \$500,000 of WIOA Set Aside Funding to hire five Re-Entry Navigators. These Navigators will be located in the following locations:

- (1) Western Maryland,
- (2) Lower Eastern Shore,
- (3) Anne Arundel (Jessup),
- (4) Baltimore City, and
- (5) Prince George's

The Navigators will interface with inmates as they are in correctional education programs (both academic and occupational). They will then serve at the critical point of contact to the local AJCs. They will also interact with businesses who hire ex-offenders. These contractual positions will report directly to the Labor Exchange Administrator for the Local Area and their progress and training will be overseen by the manager of the Maryland Re-Entry Initiative. The goal of this intervention is to create a connection between correctional education and workforce system, and to inform the State as to best practices for engaging this population.

#### *Two-Generation (2Gen) Service Delivery*

Governor Hogan, through executive order, established a Commission to study how Maryland could implement the 2Gen approach in its delivery of human services. Garrett & Allegany and Montgomery Counties have all been recipients of federal and philanthropic investments aimed at serving both children and parents simultaneously. These projects are yielding promising outcomes. However, the projects did not involve the workforce development entity in those areas.

Maryland is dedicated to utilizing the 2Gen approach in the creation of a “family friendly center.” Partners within this center would provide services for the whole family, and not just for

the adult or the child. An example could be providing child care at the center. The staff providing the care would be trained, potentially through an apprenticeship. DHS has expressed particular interest in utilizing TANF recipients as the trainees. The State estimates that a solicitation would be available by the second quarter of 2018.

#### *Other Potential Interventions and Projects*

The WIOA partners will continue to find ways to invest in the partnerships that continue to form as a result of Maryland's implementation of the federal Act. The State is currently exploring ways, for instance, to incentivize connections between TANF/TCA and WIOA partners. The State has also been in discussion with new plan partners to find ways to implement workforce interventions for homeless individuals. Both of these potential interventions also align with the State's *Benchmarks for Success*.

#### **(C) In addition, describe the state policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.**

For Disaster Planning, USDOL recommends that states use Rapid Response funds to plan for disaster response before a disaster strikes. In keeping with that recommendation, DLLR has developed a plan and taken initial preparation and coordination steps in an effort to strive for strong disaster preparedness. In the event of a disaster, Maryland will use Rapid Response funds to support the following activities:

- Devise prospective strategies to provide assistance to Local Areas experiencing disasters,
- Identify strategies for aversion of layoffs,
- Ensure mechanisms for regular exchange of information relating to potential dislocations are in place,
- Collect and analyze data and information for a number of purposes, and
- Hold disaster drills.

In the event of a natural disaster, mass layoff, or other emergency, DLLR's Secretary will work closely with the Governor and other cabinet-level staff to execute the appropriate actions in a timely manner through the Department's position on the Maryland Emergency Management Agency Board. The Secretary, in turn, will communicate with appropriate staff, including the Rapid Response team, to ensure the state fulfills its obligation to deliver the appropriate services and transitions workers to new employment as quickly as possible. The Director of the Department's Office of General Services serves as the point person for the Maryland Emergency Management Agency (MEMA). The Director takes part in daily conference calls throughout the immediate aftermath of the emergency, and interfaces with FEMA, MEMA and other state agencies to coordinate the appropriate response. That information, in turn, is provided to senior staff of the Department. In July 2016, in response to the Ellicott City flood, Governor Hogan requested that all cabinet secretaries work to find ways to provide services to those affected. In turn, the Secretary worked with all senior leaders to determine the services that could be offered by the Department. The DWDAL and the DUI worked closely together to ensure that those businesses and employees affected have access to technology and dedicated staff to ensure that unemployment benefits were filed and that reemployment efforts occurred immediately. The

DWDAL, in turn, worked closely with staff from the Local Area to ensure that job fairs and listings were widely distributed utilizing social media and agency listservs. Rapid Response teams are expected to be flexible and responsive. Therefore, it is appropriate that that Rapid Response teams play a key role in disaster response in partnership with other internal and external government, non-profit, and private agencies.

If necessary, Maryland will be able to access these funds for the following activities:

- Purchase and deployment of mobile units for service delivery in disaster areas;
- Support for organizing physical locations for disaster relief centers;
- Assist individuals with applying for UI (and Disaster Unemployment Assistance);
- Support sharing information on services available, including temporary jobs through National Dislocated Worker Grants;
- Hiring staff to support range of needs of impacted individuals, including counselors; and
- Job search assistance.

The Dislocation Services Unit, in partnership with Business Services Team, will work to ensure that Maryland businesses consider the importance of having an emergency plan within their own organization as a part of the Maryland Business Services Team's outreach efforts. Staff will offer assistance in the development of their personal disaster plan, according to their projected needs.

(D) Describe how the state provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the state disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the state will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

The federal government provides additional services to workers whose jobs are lost, or hours greatly reduced, due to foreign trade or shifts in production out of the United States. The Trade Act program is administered, staffed, and implemented by DWDAL and DUI, alongside the state's Local Areas. While not all job loss due to foreign competition meets the requirements of the Trade Act, the Rapid Response team will work with businesses to provide information on Trade Adjustment Assistance (TAA) and the benefits workers can receive if a business is certified as trade-affected. A business, union, the Rapid Response team, or the workers themselves can file a trade petition with the USDOL.

Rapid Response activities are offered to all worker groups notified of a layoff when the DSU receives a WARN or when notified of potential layoffs. The Rapid Response Team or Business Solutions Representative works with businesses to schedule Rapid Response information sessions for impacted workers. During these sessions workers are informed of the various services offered by the local AJC and the UI program. When it is determined that a potential Trade impact exists, workers are informed of the Trade program benefits and options available.

These individuals may receive services through their local AJC, as appropriate, prior to their certification of eligibility to apply for benefits and services under the Trade Act programs. Rapid Response funds will be utilized to provide layoff aversion activities.

These activities include recruitment events to create business connections, to support Local Area initiatives to re-train and to provide supportive services. The DSU will review WARN notices and work with businesses to determine if a petition can be filed as early as possible to speed the process for Trade approval. If a worker has been dislocated and is waiting for TAA eligibility determination, that person can receive career services at the local center. Once a petition is approved, DSU staff will notify impacted workers of the additional benefits available under Trade and how to apply. Rapid Response funds will be utilized to provide assistance to Local Areas in situations where the layoff event results and a need beyond the availability of local resources, including TAA assistance. Local Boards may request additional Rapid Response funds as needed to supplement other funding to serve impacted workers that may not seek assistance under Trade.

Trade Adjustment Assistance, offered at no cost to employers, allows impacted workers to access an even wider array of services for which they would not otherwise be eligible. Once the adversely affected workers become certified under the Trade program, DUI is notified and mails out letters to each of the impacted workers of the Trade certified company. The Special Program Unit and the Dislocation Services Unit place advertisements in local papers and/or via online publication, announcing that the company has been Trade Certified and providing instructions for next steps.

The Dislocation Services Unit sends out packets to the impacted workers on the eligibility list that include a letter notifying them of the TAA certification, dates, times and locations where they can attend a Trade Information Session, and information on Rapid Response services. A Trade informational session (or multiple sessions) is delivered by the Dislocation Services Unit Field Representative in coordination with the Trade Readjustment Allowance Coordinator from DUI, and Trade Program case managers local to the impacted workers. All services and benefits for which participants may be eligible based on their approved petition identifier, are presented during these events. Investigations may take several months, and are concluded when USDOL makes a Trade Determination.

Irrespective of the USDOL determination, an initial Rapid Response is always offered and arranged whenever possible for workers effected by business closings, regardless of the size of the dislocation, and whether or not a WARN was received. Maryland strives to ensure all workers receive the same services and information consistently and effectively. All impacted workers may still receive services in any one of the AJCs. Once the notice of Trade Certification is received, they may transition over to the Trade Adjustment Assistance Program if they choose to take advantage of the additional services provided to them under their corresponding certification number.

The Trade Adjustment Assistance Program enables adversely affected workers to prepare for reemployment as quickly as possible by allowing Trade-impacted participants to work individually with a case manager located in one of the statewide AJCs. The case manager will work with the Dislocation Services Unit to enroll eligible participants in the Trade Program. Participants will be co-enrolled whenever possible, as co-enrollment allows the individual to

receive career services, reemployment services, training, and support services. Funding for both programs is available at each of the AJCs. Individuals eligible for Dislocated Worker Services and Trade Adjustment Assistance Services are provided career services with the same case manager, providing a seamless approach to the development of an Individualized Employment Plan.

Case management begins with an initial assessment of the individual's skills, interests, abilities, and goals. Marketable and transferrable skills are identified during this assessment process, as well as matching existing skills to available, suitable employment with local employers. Many times the trade petition is certified well after the assessment process, and because DLLR has a co-enrollment process, the individual can continue working with the same case manager while being provided services and benefits under both the WIOA Title I Dislocated Worker program and the Trade program.

After the assessment is completed, if it is determined that the individual requires retraining in order to become reemployed in suitable employment, the case manager will continue working with the individual to develop a training plan. Participants must research training programs and requirements. They may access statewide Labor Market Information for this purpose. Training is approved if (1) the proposed training meets the six criteria for approval of training under the Trade Act, and (2) Federal Trade funds are available. The Trade Adjustment Assistance state Merit staff review and make final determinations on retraining plans, ensuring they meet the Federal requirements under the Trade Act. Co-enrollment continues through the end of the retraining program ensuring the needs of the individual are met.

Maryland strives to provide high quality, integrated services that meet customer needs. When assisting trade-impacted individuals, all partners must work together to provide accurate and consistent information. Both DLLR divisions and the case manager working with the individual must work together when developing Individualized Employment Plans. The case manager must gather accurate information during the entire training program to provide progress updates and report on benchmarks, and to ensure that the Trade Readjustment Allowance deadlines are met. This is of paramount importance, as the individual must be able to enter and complete the retraining program in the required amount of time with the financial support provided. The Dislocation Services Unit and the DUI Special Programs Unit work hand in hand in an effort to provide TAA training and financial support (TRA) without interruption and in compliance with Program rules and guidance for the duration of their services.

**(b) Adult and Dislocated Worker Program Requirements**

**(1) Work-Based Training Models** If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

*Employment Advancement Right Now (EARN) Maryland*

EARN Maryland is a state-funded, competitive workforce program that is industry-led and regional in focus. The program's flexible and innovative design ensures that Maryland's

businesses have the talent they need to compete and grow, while providing targeted education and skills training to Maryland jobseekers. EARN Maryland is comprised of Strategic Industry Partnerships (SIPs) that represent a variety of industries, including healthcare, manufacturing, construction, and biotechnology.

While traditional workforce programs often look to training entities or higher education to determine training needs and develop curriculum, EARN Maryland's innovative model tasks business and industry partners with designing the programs. At a higher level, employers are challenged to look both within and beyond their individual organization, to identify the specific skill needs for their workforce as well as the broader range of skills needed within their industry sector.

Employers and industry partners are encouraged to analyze the diverse evolving needs within their industry, too, such as training needs associated with keeping pace with increasingly sophisticated technology, and the shifting demographics caused by retirements, etc. By anticipating the changing landscape of training needs, curriculum can be designed flexibly to perform over time as an effective workforce solution.

During the development of training, employer and industry partners are consulted to determine which training strategies and techniques will be most effective in training for the skill sets they need in workers. For instance, some employers indicate that in order to truly master certain skills, on-the-job learning experiences, rather than classroom training, or some combination of both, are ideal. Because employers are the experts on what makes a competent employee, they are experienced in identifying the correct training techniques to ensure success of skill formation. Finally, employers and industry partners are required to participate in training. This occurs in a variety of ways, including teaching specific courses, observing training, and mentoring trainees. This level of participation not only allows employers to ensure the training meets their vision, but also gives employers exposure to potential employment candidates.

Soft skills are frequently rated by EARN Maryland employers as being equal in importance with specific occupational or technical skills. To address the soft skills issue, EARN Maryland partnerships participate in identifying which soft skills are critical to success in the industry. Soft skills training is implemented in the classroom and modeled in on-the-job work experiences. Some partnerships utilize a simulated work environment throughout training that requires trainees to clock in and out and practice leadership techniques on newer trainees. Essentially, trainees are required to prove that they are able to meet employer standards and that they are adequately prepared for employment.

Because EARN employers and industry partners are involved in training throughout the entire process, they play a key role in quality control. Employers are encouraged to provide feedback on training curriculum and implementation during quarterly partnership meetings throughout their participation in the program. And because the EARN program is flexible, changes to curriculum and/or training implementation can be made based on employer feedback. Upon the completion of entry-level training, employers will ideally interview successful candidates who have gone through training designed according to their standards.

EARN trainees often have significant barriers to employment, including criminal backgrounds, low levels of literacy, lack of transportation, and disadvantaged backgrounds. Each industry partnership operating an EARN grant must include at least two “diverse partners,” with experience in barrier removal. Partnerships targeting underserved groups must focus on the whole person when developing a training plan. An EARN trainee may have a wide array of technical skills and strong soft skills, but without transportation to get to work on time, their retention will not be high. To provide holistic services, partners work individually with trainees to ensure all barriers to employment are removed before entering the workforce, maximizing the odds for success. Examples of barrier removal services provided to EARN trainees include record expungement, bus tokens or a vehicle, providing bridge instruction in math and reading, GED courses and stipends for training.

Since the program began in 2014, EARN has been recognized as a national best practice for its innovation and implementation of sector strategies. In 2015 and 2016, the National Skills Coalition and Urban Institute praised EARN as a leader in industry-led workforce initiatives. In 2017, EARN was highlighted at the National Conference for State Legislatures as a model to be emulated. Additionally, at the request of the National Skills Coalition, EARN Maryland staff provided technical assistance to states seeking to emulate this national best practice.

EARN has received these accolades because the program works. As of October 2017, 2,767 unemployed and underemployed participants completed entry level training programs. Of those, 2,323 (84 percent) obtained employment. As of October 2017, over 4,400 incumbent workers participated in training, earning a new skill, certification or credential.

### *EARN Maryland, Going Forward*

Recognizing the success of the program, Governor Hogan invested in EARN through appropriations in the FY 2018 budget to ensure Maryland employers have the talent they need to compete and grow in key industries. Specifically, \$3 million was earmarked to be invested to promote training in Cyber and Information Technology. Over the next three years, \$1 million annually will be provided for green jobs training. These investments by Governor Hogan have doubled the program budget for FY18 and will allow a larger number of employers to benefit from this industry-driven program.

By supporting company efforts to update skills for new processes and equipment, there is an opportunity for business services to educate businesses not currently involved with EARN on both entry-level and incumbent worker training efforts, where appropriate. Both DLLR and Commerce have previously invested in matching grant programs directed to businesses. These investments in Maryland’s businesses provided customized training solutions for individual companies with unique or proprietary technical skill requirements.

Much has been learned through the implementation of EARN to date, but there are new ideas to explore and further develop to better serve businesses and jobseekers.

Areas for future exploration:

1. Developing an approach for industry-lead programs to target special populations such as those served by DORS, TANF, etc. - The interplay between industry-led partnerships and provision of services to targeted populations is one that some grantees have undertaken. We look forward to learning from their experiences.
2. Bringing programs such as EARN to scale - EARN has been successful and has involved more than 500 business and industry partners. However, Maryland has approximately 10,000 businesses. The effort to involve a larger number of businesses in industry-led partnerships, leading to training, and the creation and use of career pathways, is a challenge that EARN can help to address by providing lessons learned.
3. Outline strategies to increase work-based learning experiences such as paid internships and RAs that provide jobseekers with the skills and credentials necessary to secure employment and advance in their jobs with family sustaining wages and benefits by building new sector partnerships and strengthening existing partnerships - EARN will serve as the starting point for this, as some SIPs are providing work-based learning experiences. We look forward to building on lessons learned.
4. Tying business services with EARN - Maryland is committed to creating a business-focused delivery system for workforce needs. In a business-focused system, customized training can be used to meet the special requirements of an employer or group of employers, conducted with a commitment by the employer to employ all individuals upon successful completion of training. Some EARN Partnerships are providing incumbent worker training that meet an employer's specialized needs. Under WIOA, incumbent worker training is an allowable cost, so the partners will review best practices from these training initiatives. The WIOA Partners collaborate with the business to identify eligible program participants and potential sources of training funds.
5. Identification and delivery of industry recognized credentials through industry-led partnerships.
6. Incorporation of an increase in work-based learning opportunities in EARN and throughout the business-focused delivery system with the Job Driven National Emergency Grant Program - Under this system, dislocated worker services will focus on industry-driven partnerships with the business community. Utilizing this renewed focus, employer partnerships create job opportunities for dislocated workers through work based learning, on-the-job training, and customized and occupational skills training. Some EARN Maryland Partnerships are leveraging JDNEG funding, but the WIOA partners will explore ways to more effectively take advantage of this opportunity. Maryland will continue to utilize models like EARN Maryland and those established under the Job Driven National Emergency Grant program in advancing this business focused system. Under this system, dislocated worker services will focus on industry-driven partnerships with the business community. Utilizing this renewed focus, employer partnerships create job opportunities for dislocated workers through work based learning, on-the-job training, and customized and occupational skills training.

#### *The Maryland Youth Apprenticeship Program*

The Maryland Youth Apprenticeship Advisory Committee was charged, pursuant to Chapter 646 of the Acts of 2014, with the review and expansion of youth apprenticeship opportunities throughout Maryland. In December 2015, the Committee released a blueprint for Maryland's

youth apprenticeship system that has since driven the establishment of the State's first youth "Apprenticeship Maryland" youth apprenticeship pilot program specifically dedicated to growing opportunities in Science, Technology, Engineering and Mathematics (STEM) occupations.

The pilot program is a partnership between the Maryland Departments of Labor, Education, and Commerce. As outlined in the legislation, Apprenticeship Maryland is a 2-year pilot program requiring students to complete 450 hours of on-the-job learning and at least one-year of classroom instruction related to the eligible career path.<sup>xxxix</sup> Students completing the program will receive both high school diplomas and state certification, while employers will have the opportunity to build their talent pipeline.

Staff from the Maryland DLLR, the MSDE, and local school systems of Washington and Frederick Counties are engaged in establishing the systems, policies, and strategies to engage businesses, students, and their parents. In March, 2016, the Maryland Secretary of Labor adopted regulations outlining the specific conditions related to youth apprenticeships. Both school systems established Apprenticeship Maryland Local Advisory Committees including representatives from the Local Board and economic development office, employers/sponsors, secondary and postsecondary education, professional school counselors, government agencies, local chambers of commerce; the local school systems and school liaisons, and other stakeholders.

### *General Training Strategies*

Whenever possible, the use of these strategies that reflect best practices in workforce development will be considered as leverage opportunities for future discretionary grant opportunities. Industry-based training will be the priority for any available competitively procured and state discretionary funding. The State's industry cluster approach will be the focus of WIOA statewide activities.

Individual Training Accounts will become increasingly important in a business focused workforce development system. Local Areas are encouraged to maintain a balance between cohort class-size training and Individual Training Accounts (for example, Industry Academies and career pathway systems) to ensure an effective business focused workforce system. Local workforce partners also play a key role in the development of a business-focused workforce system. State and local entities must work together to develop work-based training opportunities, including on-the-job training, apprenticeships and internships for youth and adults. Utilizing limited funding sources for industry-lead partnerships is key, particularly in light of the limited available support for the continued influx of participant training in degree or certificate programs. Therefore, local partners must develop a practice of issuing Individual Training Accounts based on high-demand, difficult to fill positions identified within local industry clusters.

Maryland will further ensure that at least 20 percent of youth formula funds at the local level are used on work-based training activities such as summer jobs, on-the-job training (OJT), and apprenticeship for in school and out of school youth. Local Boards must further utilize WIOA

funds in support of the business focused system. Locally defined priority industries must be identified by Local Boards and appropriate services developed and provided based upon input received from employers and other key partners. Apprenticeships, on-the-job training, incumbent worker training, and individual training accounts can be used to provide business-driven training.

**(2) RA. Describe how the State will incorporate RA into its strategy and services.**

Governor Hogan's strategic vision for the workforce system is to provide businesses with the skilled workforce they need to compete in the global, regional, and local economies. A bedrock strategy within that vision is the expansion of RAs, a time-honored work-based learning model that offers both Sponsors and job seekers valuable benefits.

The apprenticeship model offers job seekers access one-on-one on-the-job (OJT) training and related classroom instruction as a path to mastering occupational skills. Most RAs provide opportunities for career advancement that incorporate progressive wage increases aligned with skill increases. Often, apprenticeships also offer healthcare, retirement and fringe benefits, as well.

Apprenticeships provide desirable outcomes for employers, as well. The employees produced through RAs are technically up-to-date workers capable of meeting existing workforce needs. Over time, these same employees can become the pipeline of skilled workers employers can feel comfortable promoting from technical to management positions. Besides these inherent benefits, RAs are also associated with reduced employee turnover, quality output, increased productivity and a more cohesive team.

Maryland has made significant progress towards the goal set in the State's original 2016-2020 WIOA Plan to align RAs with the Maryland's workforce system. During the 2016 Legislative Session, the Maryland General Assembly transferred the State's RA program from Maryland's Higher Education Commission to DLLR's DWDAL. This legislative enactment, approved unanimously by the Assembly and signed into law by Governor Hogan, has allowed the State to align RAs with workforce development programming. The change also provides key resources for the growth and expansion of RAs.

### *Apprenticeship Models*

RAs combine supervised, structured, On-the-Job Training (OJT) and Related Technical Instruction (RTI) to teach Registered Apprentices (apprentices) the skills needed to succeed in a specific occupation. RAs are voluntary, industry-driven programs sponsored by employers, employer associations, or jointly by management and labor. A program sponsor can be an individual employer, groups of employers, or combinations of employers and unions. Each sponsor develops a RA program based on the needs of specific occupations.

Maryland recognizes three types of RAs:

- Time-based RA Programs – The most common model, Time-based Programs combine a full-time position requiring a minimum of 2,000 hours of paid OJT with 144 hours of

RTI. Time-based programs vary in length from one to five years. Apprentices who satisfy OJT and RTI requirements are certified as Journeypersons in the occupation.

- Competency-based RA Programs – The Competency-based RA model was approved under new regulations as a recognized RA model in 2017. In the Competency-based Model, apprentices progress through a training program, mastering individually identified and measured competencies. Sponsors measure apprentice skill gains through demonstration during work activities. The model enables Sponsors to offer an open entry and exit method, shortening the required time for apprentices who acquire skills more quickly, while extending the training period for apprentices who need more time to meet skill requirements.
- Hybrid RA Programs - This model blends elements of time and competency-based models, blending OJT and RTI. Sponsors establish minimum and maximum ranges of hours based on the job requirements, increasing or decreasing a program's length by up.

#### *The RA Process for Job Seekers*

Jobseekers interested in exploring RA opportunities are encouraged to research trades to learn more about related occupations. A list of apprenticeship occupations is accessible on the Maryland Apprenticeship and Training Program webpage at: [www.dllr.state.md.us/labor/appr](http://www.dllr.state.md.us/labor/appr). Individuals who have selected a trade in which they wish to pursue an apprenticeship may contact program sponsors directly to inquire about specific application requirements and hiring schedules, which vary by Sponsor and program. Prospective apprentices seeking additional information may also contact the Maryland Apprenticeship and Training Program via email at [info@mdapprenticeship.com](mailto:info@mdapprenticeship.com).

Newly hired apprentices and their Sponsors must complete an Apprentice Agreement, which must be filed with the Maryland Apprenticeship and Training Council. The Apprenticeship Agreement formally classifies the individual as a Registered Apprentice. The Maryland Apprenticeship and Training Council is responsible for registering and regulating the State approved RA programs in Maryland. Apprentices who meet all program requirements receive a certificate of completion and are nationally recognized journeypersons.

#### *The RA Process for Sponsors*

Potential Sponsors develop RA programs and apply for registration. The Maryland Apprenticeship and Training Council reviews the “Standards of Apprenticeship” which include:

- An organized, written training plan;
- The terms and conditions of employment;
- Provision of Related Technical Instruction;
- An equal employment opportunity pledge;
- Proper supervision of the apprentice(s).

#### *Growing and Diversifying RAs in Maryland*

Currently, more than 9,000 apprentices are enrolled in RAs in Maryland, in 417 programs covering 230 occupations. A total of 3,500 Sponsors oversee these apprenticeships. To expand on these numbers, Maryland continually explores new funding opportunities to strengthen the State's RA programs.

In 2016, the USDOL awarded Maryland \$2.2 million for the acceleration and expansion of RA opportunities in the State. Both the ApprenticeshipUSA Accelerator Grant and the ApprenticeshipUSA State Expansion Grant invest in the State's RA programming. The funds provided under these grants are vitally important to address the pressing workforce needs of Maryland's businesses.

Maryland is using these grant funds, as well as leveraging resources, to grow and diversify RAs. The end goal is to provide Maryland's business with a sustainable employment pipeline in both traditional and non-traditional industry sectors focusing on the following critical elements:

1. Expanding Capacity by Increasing Staffing and Infrastructure - To grow pre-apprenticeship and RA opportunities, key infrastructure investments are needed. Historically, Maryland's apprenticeship unit consisted of three individuals: a Program Manager, an Apprenticeship and Training Representative (ATR), and an Apprenticeship Navigator. Noting that growth requires a continued investment in human capital, DLLR has utilized grant opportunities to expand the unit through the addition of six contractual staff positions, five Apprenticeship Navigators, and one Apprenticeship and Training Representative.
2. Diversifying Occupations - The majority of Maryland's RAs Programs are within the building trades and construction industries. The growing recognition across industry sectors of the value of RA has driven a significant increase in the number of non-construction/skilled trades occupations. Less-traditional apprenticeship industries, such as hospitality, health care, manufacturing, cybersecurity and information technology, are seeing an uptick in revitalized or new RA Programs. For example, an additional component of the State's ApprenticeshipUSA Expansion Grant is a Capbreaker Award, designed to institute a pilot program aimed at mitigating the hiring challenges found within the healthcare industry. The pilot program draws on an untapped resource, internationally trained skilled immigrants, who call Maryland home. The Baltimore Alliance for Careers in Healthcare (BACH), the entity which will serve as the RA sponsor for the pilot initiative, includes Baltimore area hospitals such as Johns Hopkins Hospital. BACH obtained approval from the Maryland Apprenticeship and Training Council to employ a competency based model in May 2017.
3. Outreach/Education – Through ongoing technical assistance from USDOL, DLLR held a training event for workforce professionals, community colleges, education officials, and other state and local entities facilitated by a national expert on building RA programs. The State also hosted a portion of the inaugural Transatlantic Apprenticeship Exchange Forum, held in Washington, D.C. and Baltimore with representatives from the United Kingdom's apprenticeship program. Outreach to chambers of commerce and industry associations, and State and Local Boards are occurring, and the connections formed through these industry groups have nurtured several opportunities to engage industry to develop multi-employer programs and program templates. Maryland further utilized a

portion of ApprenticeshipUSA grant funds to invest in outreach to existing, but inactive, RA Sponsors, resulting in the reactivation of seven Sponsors and the registration of fifteen new RA Sponsors 2017. Lastly, relationships are being leveraged with over 500 industry sector partnerships through Maryland's Employment Advancement Right Now (EARN) Maryland program.

4. Advancing Innovative Practices - DLLR established an "Apprenticeship Innovation Fund" to invest in programs that support and enhance RA expansion strategies, particularly for vulnerable populations, youth, and dislocated workers. Through this fund the Department dedicated \$621,000 in early 2017 to award competitive grants to applicants, so they may implement new and promising ideas or adapt proven strategies, at the system or service delivery level, to expand the reach of RA programs in Maryland. In April 2017, the State announced the first four recipients of funding from the Apprenticeship Innovation Fund.

Maryland will continue to explore opportunities to leverage existing and future discretionary grant opportunities to create and enhance pre-apprenticeship and apprenticeship programs across Maryland. Detailed information on Maryland's extensive apprenticeship offerings and activity during 2016 can be viewed at [www.dllr.state.md.us/employment/appr/apprannreport.pdf](http://www.dllr.state.md.us/employment/appr/apprannreport.pdf).

#### *Maryland's Eligible Training Provider List*

The State is committed to adding all RA programs that indicate interest to the State's Eligible Training Provider List (ETPL). Per the comprehensive new ETPL policy issued by the State in 2017, RAs are automatically included on Maryland's ETPL if approved via the extensive application and vetting process conducted by Maryland's Apprenticeship and Training Council. Approved RAs will remain on the ETPL as long as the program is registered or until the program Sponsor notifies the Maryland Director of Apprenticeship and Training that it no longer wants to be included on the list. In December 2016, DLLR notified all existing RA program sponsors of their eligibility to be on Maryland's ETPL. For inclusion, new Sponsors must complete and submit the form accessible at:

[www.doit.state.md.us/selectsurvey/RegisteredApprenticeshipProgram](http://www.doit.state.md.us/selectsurvey/RegisteredApprenticeshipProgram).

Through outreach and educational efforts, the ETPL now includes thirty-four RA programs. Maryland's Apprenticeship and Training Council will continue to work with RA programs to encourage use of the ETPL as an important avenue to access WIOA funding for training and to create pipelines for apprenticeship programs across Maryland.

#### *Connecting Individuals with Disabilities to Apprenticeship Opportunities*

The State of Maryland is committed to providing opportunities for individuals with disabilities, and the RA program is no exception. RAs offer young adults, including those with disabilities, career pathways that provides employment as the individual learns on the job. Focused attention is directed towards developing relationships with RA Sponsors/employers to encourage increased participation of individuals with disabilities in RA programs. Outreach efforts to identify and educate individuals with disabilities on the value of and opportunities in RA programs include, but are not limited to:

- Working with State VR agencies, the Veterans' Employment and Training Service (VETS), convening a roundtable of employers who hire people with disabilities to introduce the concept of developing apprenticeable occupations; S
- Showcasing a Registered Apprenticeship model among disability-friendly businesses; and
- Establishing public-private partnerships to develop outreach strategies for those individuals with disabilities.

DLLR is dedicated to aligning RA opportunities with the workforce system as a valuable method for building a pipeline of skilled and qualified labor for years to come. By establishing a robust RA system, Maryland is well-positioned to launch new and innovative RA opportunities within the workforce system.

### *Youth Apprenticeships*

Youth Apprenticeship DLLR partnered with the MSDE and the Department of Commerce in developing the Apprenticeship Maryland youth apprenticeship pilot program in two local Maryland school systems. The collaboration is a part of the Augustine Commission's report released in February 2015.

As a direct result of the Commission's recommendations, Apprenticeship Maryland was established by Maryland's General Assembly. At the beginning of the 2016-2017 school year, students from Frederick and Washington County Public School systems were able to apply for positions with local businesses who have registered to be apprentice sponsors, giving students the opportunity to earn while engaged in work-based learning experiences from the area's top employers. Each county can recruit up to 60 students for participation in the pilot program over the two-year program. The Department has released two annual reports on Youth Apprenticeship. Reports, as well as additional up-to-date information on Maryland's Youth Apprenticeships program may be accessed at [www.dllr.state.md.us/aboutdllr/youthappr.shtml](http://www.dllr.state.md.us/aboutdllr/youthappr.shtml).

**(3) *Training Provider Eligibility Procedure.*** Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including RA programs (WIOA Section 122).

Under WIOA, training is provided to eligible adults, dislocated workers, and youth through a robust eligible training provider and program list (ETPL), comprised of entities with demonstrated capabilities of training individuals to enter quality employment. The Maryland DLLR plays a leadership role in ensuring the success of the ETPL in collaboration with the State's 12 Local Boards and other partners, such as Maryland Higher Education Commission. Maryland's ETPL and the related eligibility procedures ensure the accountability, quality, and labor market relevance of programs of training services that receive funds through WIOA Title I, Subtitle B.

When developing its ETPL policy, the State had the following goals in mind:

- Ensure that Local Areas have sufficient numbers and a diverse pool of quality providers of in-demand training;
- Create an effective marketplace for the training programs available to WIOA participants with Individual Training Accounts (ITAs);
- Reduce burden on training providers to submit accurate performance information and to guide WIOA participants, in conjunction with staff, in selecting training in the State and Local Areas;
- Prohibit discrimination by training providers in accepting and enrolling WIOA program participants; and,
- Provide information on eligible training programs to WIOA participants in a way that helps them make informed decisions, along with staff and within local policy, on how to use their ITAs.

As the State workforce agency, DLLR has been designated as the entity responsible for defining and carrying out the processes and procedures for determining the eligibility of training providers and programs of training services. DLLR is specifically responsible for:

- Developing and maintaining the State ETPL and programs as described in 20 CFR 680.450 (initial eligibility), 20 CFR 680.460 (continued eligibility), and 20 CFR 680.490 (performance and cost information reporting requirements);
- Ensuring that programs meet eligibility criteria and performance criteria established by DLLR;
- Removing programs that do not meet State-established program criteria or performance levels, as described in 680.480(c) and in this policy;
- Taking appropriate enforcement actions against providers that intentionally supply inaccurate information or that substantially violate the requirements of WIOA, as described in 680.480(a) and (b); and,
- Disseminating the ETPL, accompanied by performance and cost information related to each program, to the public and the Local Boards throughout the State, as further described in 680.500.

The State's Local Boards are responsible for the following functions:

- Carrying out the policies and procedures assigned to the Local Board;
- Documenting local policies and procedures as related to ETPL, including the handling of Personally Identifiable Information (PII) and the Family Educational Rights and Privacy Act;
- Ensuring the protection of PII and other sensitive information;
- Working with DLLR to ensure there are sufficient numbers and types of providers of training services, including eligible providers with expertise in assisting individuals with disabilities and adults in need of adult education and literacy activities described under WIOA sec 107(d)(10)(E), serving the Local Area; and,
- Ensuring the dissemination and appropriate use of the Maryland ETPL through the local AJC delivery system.

#### *Initial Eligibility*

The process of initial eligibility for inclusion on the ETPL is designed to ensure that WIOA participants are using ITAs for high-quality training programs that are likely to result in positive employment outcomes. The eligibility review process provides an opportunity to assess whether training programs meet the quality standards required by Maryland to be included on the ETPL and to ensure customers have access to up-to-date information about program requirements and costs.

DLLR, in consultation with the GWDB, is charged with establishing eligibility criteria and procedures for the initial eligibility of training providers and programs to receive funds under WIOA Title I, Subtitle B. The State and its 12 Local Boards must work together to ensure sufficient numbers and types of training providers and programs to maximize customer choice while maintaining the quality and integrity of training services. DLLR will use the information provided in ETPL application to inform customers and stakeholders on: (1) the ETPL website and other related public materials; and, (2) the ETPL annual performance report.

The application process for initial ETPL eligibility has two steps: (1) A provider must complete and submit an electronic application: <http://www.doit.state.md.us/selectsurvey/initialetpl>; and, (2) submit required application enclosures.

Applications must include the following key elements in addition to all other information requested in the application:

- Description of partnership with and relevancy for business;
- Description of how the provider's training services align with in-demand industry sectors and occupations, as specified in the WIOA State and/or Local Plan(s);
- At least two quarters of verifiable performance outcome data for initial ETPL consideration;
- Commitment from the program provider to begin collecting and reporting to DLLR the social security numbers of all individuals engaging in the program (to include all WIOA-funded participants and all non-WIOA funded participants) on an annual basis, as prescribed by DLLR, once included on the ETPL in order to meet performance requirements of WIOA Sections 116(b)(2)(A)(i)(I)-(IV), 20 CFR 680.460(g)(1)-(4), and 20 CFR 361.230.

Initial eligibility for a particular program expires after one year of initial approval, and therefore, providers must apply for continued eligibility within 30 days of the application deadline.

#### *Continued Eligibility*

The USDOL requires DLLR to annually report on the performance of providers included on Maryland's ETPL. The information submitted by providers to DLLR for annual reporting purposes will: assist DLLR in determining whether a program meets requirements for continued ETPL eligibility; assist WIOA participants and members of the general public in identifying effective training programs and providers; and benefit providers by widely disseminating

information about their programs and potentially as a tool to enhance their programs, which in turn would provide a direct benefit to participants.

To complete the annual report, the WIOA Training Program Manager will rely on information from three key places: (1) data submitted annually for reporting purposes by the providers; (2) information provided in the ETPL application (or provided via ETPL program updates from the training provider to the WIOA Training Program Manager); (3) data concerning WIOA participants that are captured in the MWE.

### *RA Programs*

Under WIOA, RA programs are not subject to the same application and performance information requirements or to a period of initial or continued ETPL eligibility as other training providers. This is because they go through an extensive application and vetting process with the Maryland Apprenticeship and Training Council to become a RA program sponsor. RA program sponsors are, therefore, automatically eligible for inclusion on the state ETPL and will remain on the list as long as the program is registered or until the program sponsor notifies the Maryland Director of Apprenticeship and Training that it no longer wants to be included on Maryland's ETPL.

In December 2016, DLLR notified all existing RA program sponsors of their eligibility to be on Maryland's ETPL. DLLR is committed to adding all RA programs that indicate interest to the State's ETPL.

(4) Describe how the state will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.

Maryland's WIOA system can be a pathway to the middle class and a means to maintain and build the skills necessary to remain in the middle class. Maryland is committed to ensuring its target populations are able to access the WIOA system on a priority basis. For the WIOA Title I Adult Program, this means that Local Areas must provide priority for training activities to individuals in the target populations.

#### Target Populations: Individuals with Barriers to Employment

- Displaced Homemakers
- Eligible MSFWs
- Ex-offenders
- Homeless individuals
- Individuals facing substantial cultural barriers
- Individuals with disabilities, including youth with disabilities
- Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act
- Individuals who are English language learners
- Individuals who are unemployed, including the long-term unemployed
- Individuals who have low levels of literacy
- Individuals without a High School Diploma

- Low income individuals (including TANF and SNAP recipients)
- Long-term unemployed individuals
- Native Americans, Alaskan Natives, and Native Hawaiians
- Older individuals
- Single parents (including single pregnant women and non-custodial parents)
- Veterans
- Youth who are in or have aged out of the foster care system

Under WIOA, priority must be provided regardless of the level of available funds. Priority must be provided in the following order:

1. First Priority - Veterans and eligible spouses who are also low-income, recipients of public assistance and/or basic skills deficient;
2. Second Priority - Individuals who are not veterans or eligible spouses, but meet criteria to be considered a target population;
3. Third Priority - Veterans and eligible spouses who did not meet "first priority" conditions; and
4. Fourth Priority - Individuals who are not veterans and do not meet criteria to be considered a target population.

The state will ensure priority of service provisions are appropriately followed and monitored through several means. First, the Local Areas must adhere to these priority provisions and, within their local plans, provide details on how priority shall be given in the Local Area within these parameters. Specifically, Maryland asked its 12 Local Areas to provide "a description of how the Local Board will provide priority of service that conforms with the State Plan. This should include a description of additional local requirements or discretionary priorities, including data to support the need and how the local requirement and/or priority will be documented and implemented for the Adult program." Second, Maryland is in the process of implementing the *Benchmarks of Success* to enhance services for those populations that need them the most. Finally, another key way that Maryland will ensure priority of service is effectively offered is through local WIOA MOUs. The GWDB, DLLR, DHS, and DORS jointly issued a policy on WIOA MOUs and RSAs with fillable templates. This policy requires that WIOA MOU contain provisions regarding a number of key components, including priority of service. The policy states that "all partners must certify within the local WIOA MOU that they will adhere to all statutes, regulations, policies, and plans regarding priority of service, including, but not limited to, priority of service for the WIOA Title I Adult Program and for veterans and their eligible spouses."

**(5) Describe the state's criteria regarding Local Area transfer of funds between the adult and dislocated worker programs.**

On behalf of the Governor, DLLR annually allocates funds for both the WIOA Title I Adult and Dislocated Worker programs. Allocations are made to Local Boards for Local Areas in consultation with the chief local elected officials. As explained in WIOA Section 133, when approved by DLLR, a Local Board may transfer up to and including 100 percent of a PY and FY allocation for Adult employment and training activities, and up to and including 100 percent of a PY and FY allocation for Dislocated Worker employment and training activities between the two programs. Transfers may only occur between Adult and Dislocated Worker funds within the

same funding phase. For example, PY16 expenditures cannot be transferred to PY15 funding. Local Boards may not transfer funds to or from the Youth program. A Local Board may delegate its authority under WIOA Section 133 to the director of Local Area or other designated signatory of the Local Area. A delegation can only be accomplished through a resolution of the Local Board, or by a process that is identified in the area's approved Local Plan.

When a Local Board elects to exercise its transfer authority, DLLR will require that state policy guidance on requesting a transfer, approving a transfer, and reporting a transfer is adhered to. DLLR has additionally established an appeal process for circumstances where a Local Board wishes to appeal a denial of its transfer request. When approved by OFA, a Local Board may transfer up to and including 100 percent of a PY and FY allocation for Adult employment and training activities, and up to and including 100 percent of a PY and FY allocation for Dislocated Worker employment and training activities between the two programs. Transfers may only occur between Adult and Dislocated Worker funds within the same funding phase. For example, PY15 expenditures cannot be transferred to PY14 funding. Local Boards may not transfer funds to or from the Youth program. A Local Board may delegate its authority under WIOA Section 133 to the Director of Local Area or other designated signatory of the Local Area. A delegation can only be accomplished through a resolution of the Local Board, or by a process that is identified in the Local Area's Local Plan. When a Local Board elects to exercise its transfer authority, it is important to adhere to the following policy guidelines. Requesting a Transfer Before making a transfer, a Local Board must obtain OFA's written approval. A Local Board shall request a transfer by completing the Funding Transfer Request form that includes the following information:

- The number for the grant that expenditures would be transferred from;
- The number for the grant that expenditures would be transferred to;
- The amount of the transfer;
- A justification for the transfer;
- The requested effective date of the transfer;
- An assurance that there are sufficient funds in the budget for required activities for the remainder of the PY and FY; and
- The Catalog of federal Domestic Assistance (CFDA) number, which is assigned by the federal funding agency and is listed on the Notice of Obligation.

Transfer requests must be received at least 45 calendar days prior to the end of the grant. If a Local Board has an unforeseen circumstance that may require an exception, the Local Board must contact OFA immediately for further discussion and direction. If the transfer exceeds 50 percent, the Local Board must provide justification for the transfer and assurance that services will be provided to the targeted population of the transferred funding source, with details on what funding sources will be used. The effective date cannot be retroactive past the current reporting period. In other words, the transfer would not change/affect the financial reports previously submitted. Local Boards must submit completed request forms, signed by the Local Board Chair (or the Director of the Local Area or other designated signatory of the Local Area, designated by resolution or identified in the Local Plan, as set forth above), by email to the DWDAL. In the event that the request is made by the Local Area Director, the Local Board Chair must timely affirm that he or she has been apprised of the requested transfer. No request will be reviewed by

OFA until written affirmation is received. Written affirmation should be sent via email to Dorothee Schlotterbeck.

### *Approving a Transfer*

When determining whether a transfer request is approved or denied, OFA must consult the DWDAL Director of the Office of Workforce Development (OWD) and review the Local Area's WIOA Adult and Dislocated Worker funding expenditures, obligations, and balances to ensure these are in support of the Local Board's request. OFA should request additional information or clarification from the Local Board, as needed. As set forth in the state's Policy on the authority to transfer between WIOA Title I funds, an Local Area must provide to DWDAL an assurance that there are sufficient funds in the budget for required activities for the remainder of the PY and FY. Also, should the transfer exceed 50 percent, the Local Area must provide justification for the transfer and assurance that services will be provided to the targeted population of the transferred funding source, with details on what funding sources will be used. After reviewing the request, OFA shall email an official determination to the Local Board Chair, the Local Area Director and the Local Area Fiscal Manager, signed by the DWDAL Assistant Secretary, with the determination to approve or deny within ten business days. OFA shall file documentation in the Local Area's WIOA grant file and, when approved, the transfer amount shall be posted on the grant tracking worksheet/system. A Local Board may appeal a denial of its transfer request to the DWDAL Assistant Secretary within ten calendar days from the received date of the denial notice. The appeal must be in writing and state the grounds for the appeal. Reporting a Transfer When approved, Local Areas shall report the transfer to OFA on the Adult and Dislocated Worker Quarterly Status Reports (QSRs). On the Adult QSR, Local Areas shall report the transfer as "the amount of Adult funds expended on the Dislocated Worker Program." On the Dislocated Worker QSR, Local Areas shall report the transfer as "the amount of Dislocated Worker funds expended on the Adult Program. "In turn, OFA shall report the transfer to the USDOL on the Quarterly Financial Report for both "Local Adult" and "Local Dislocated Worker."

(c) Youth Program Requirements. With respect to youth WIAivities authorized in section 129 of WIOA—

(1) Identify the State-developed criteria to be used by local boards in awarding grants for youth activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants.<sup>11</sup>

WIOA outlines a broader youth vision that is grounded in evidence-based strategies to support a service delivery system that is dedicated to achieving high-levels of performance, accountability and quality in preparing young people for the workforce. Through the WIOA Title I Youth Program, WIOA places a greater emphasis on supporting the educational and career successes of out-of-school youth. A minimum of 75 percent of WIOA Title I Youth Program funds is required to be spent on out-of-school, which is an increase from the minimum of 30 percent under WIA. The law also expands the Youth Program's key elements to include dropout recovery strategies and services, education offered concurrently with workforce activities and training, financial literacy education, entrepreneurship, post-secondary transitional support, and Labor Market

Information. Local Areas now must spend at least 20 percent of WIOA Title I Youth Program funds on work experiences that incorporate academic and occupational education. The WIOA Youth Program is designed to support eligible youth in reaching their educational and career goals. To meet this aim, Local Areas and local provider that are awarded competitive contracts, must:

- Conduct an objective assessment of the participant's skills;
- Develop an Individual Service Strategy (ISS) with the participant; and,
- Utilize WIOA's 14 Youth Program elements to support the participant in reaching his or her career and academic goals.

### *Selecting Service Providers*

DLLR encourages Local Boards to develop formal partnerships, through a competitive process, to select WIOA Youth Program service providers that will allow multiple agencies and organizations to fund different aspects of the WIOA Youth Program. Each local system of services can be coordinated through a combination of contracts and MOUs between the participating entities. As a result of this strategy, funds from federal agencies like the Department of Justice (under programs for incarcerated youth on probation) or the Department of Health and Human Services (under programs for homeless or foster youth), or other USDOL programs (WIOA Title II Adult Education programs) could be leveraged to provide certain services for WIOA Youth Program participants to help them reach their educational and career goals. In granting or contracting WIOA Youth Program services, Local Boards must award grants or contracts on a competitive basis to providers of youth activities identified based on the criteria identified in the State Plan and taking into consideration the ability of the providers to meet performance accountability measures. In an effort to foster WIOA partnerships, DLLR has a preference for the Title II Adult Education service providers for instruction to help youth participants prepare for the GED® and National External Diploma Program® (NEDP®) programs. A Local Board may award grants or contracts on a sole-source basis only if it determines there is an insufficient number of eligible providers of youth activities in the Local Area (such as a rural area) for grants and contracts to be awarded on a competitive basis. It is important to incorporate the major changes in WIOA into Requests for Proposals and youth provider contracts immediately. For example, if a Local Area issues separate Requests for Proposals for in-school youth and out-of-school youth, they should be structured in a way to ensure local areas are moving toward implementation of the 75 percent OSY expenditure minimum. Local Areas should similarly incorporate the 20 percent work experience expenditure minimum into RFPs and new service provider contracts. For DLLR's records, Local Areas must provide DLLR with timely copies of the selected service providers' contracts or grant agreements. DLLR encourages Local Areas that grant or contract out Youth Program services to include DLLR's Youth & Disability Coordinator in the Requests for Proposal evaluation and selection process.

### *Option Year Contracts*

Local Areas must incorporate WIOA requirements by amending or modifying the option years of current contracts, provided that such changes are permissible under the contract (i.e., if the contract includes legislation, regulation, or requirements). In competing new contracts, USDOL and DLLR encourage Local Areas to employ one-year contracts which may contain additional

option years, rather than multi-year contracts, at the beginning of WIOA implementation. Given how resource-intensive the Requests for Proposal process may be, option year contracts are a strategy to ensure maximum flexibility while final regulations are published and program guidance is issued. They also provide added flexibility to Local Areas during a time of transition when regulations and guidance will be issued that could provide information necessary for future service provider contracts.

(2) Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional AJC partner programs, and any other resources available.

WIOA outlines a broader youth vision that is grounded in evidence-based strategies to support a service delivery system that is dedicated to achieving high-levels of performance, accountability and quality in preparing young people for the workforce. Through the WIOA Title I Youth Program, WIOA places a greater emphasis on supporting the educational and career successes of out-of-school youth. A minimum of 75 percent of WIOA Title I Youth Program funds is required to be spent on out-of-school, which is an increase from the minimum of 30 percent under WIA. The law also expands the Youth Program's key elements to include dropout recovery strategies and services, education offered concurrently with workforce activities and training, financial literacy education, entrepreneurship, post-secondary transitional support, and Labor Market Information. Local Areas now must spend at least 20 percent of WIOA Title I Youth Program funds on work experiences that incorporate academic and occupational education. The WIOA Youth Program is designed to support eligible youth in reaching their educational and career goals. To meet this aim, Local Areas and local provider that are awarded competitive contracts, must:

- Conduct an objective assessment of the participant's skills;
- Develop an Individual Service Strategy (ISS) with the participant; and,
- Utilize WIOA's 14 Youth Program elements to support the participant in reaching his or her career and academic goals.

#### *Co-Enrollment*

Given WIOA's focus on providing an integrated service delivery system that leverages resources across the State, DLLR encourages Local Areas to co-enroll youth participants in both the WIOA Youth Program and other related programs when appropriate. The following list provides examples of programs where co-enrollment may make sense for the youth participant:

- DLLR's WIOA Title I Adult Program;
- DLLR's WIOA Title I Dislocated Worker Program
- DLLR's WIOA Title II Adult Education Program
- DHR's TANF Program
- DHR's Supplemental Nutrition Assistance Program (SNAP)
- MSDE's DORS Program
- DLLR's JVSG Program
- DLLR's Trade Adjustment Assistance (TAA) Program

- DHR's John H. Chafee Foster Care Independence Program.

Youth participants must meet eligibility criteria for participation within each program before co-enrollment occurs. Maryland recognizes that the WIOA system's mark of success goes beyond the measures required by federal partners. Utilizing the technical assistance provided to Maryland through its participation in the U.S. Department of Health & Human Services' Systems to Family Stability National Policy Academy, the WIOA Partners have worked collaboratively to determine how best to measure success. As Maryland seeks to strengthen and enhance its workforce system through implementation of the State Plan, success requires a commitment to innovation, collaboration, and a true systems approach among the State's many workforce partners. In order to guide the WIOA Partners in this work, the Benchmarks of Success for Maryland's workforce system will set forth a clear vision, goals, and measurable achievements that help define success and lay the core foundation of this new system. These goals and benchmarks are not mere measures, but rather provide a way of thinking systematically about how we deliver services. They reflect Maryland's dedication to focusing its efforts on people who need the system's assistance the most. To be clear, the intention of these benchmarks is not to be punitive; but rather, to be forward thinking about what success really means in Maryland. Utilizing these benchmarks, Maryland will work to create greater opportunities for Maryland's out-of-school youth through the alignment of the State's core partner programs.

(3) **Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented.<sup>12</sup>**

Local Areas must ensure that each WIOA Youth Program provider consistently conducts an objective assessment of each participant's academic levels, skill levels, and service needs to properly identify the appropriate services and career pathways. The assessment must include a review of: basic skills; occupational skills; prior work experience; employability; interests; aptitudes, including interests and aptitudes for nontraditional jobs; supportive service needs; and, developmental needs.

If the participant has been assessed by a provider to pursue another education or training program within the last year, the WIOA Youth Program provider may use that existing assessment to fulfill program requirements. When used, the provider must retain copies of previous assessment(s) and/or assessment result(s) in the participant's case file.

The Individualized Service Strategy (ISS) serves as a guide for both the participant and staff by outlining the necessary and recommended next steps. Through the ISS, staff should aim to identify the appropriate combination and sequence of services to help the participant fulfill goals and program requirements. It is vital that staff interpret assessment results and incorporate those results into service planning and activities. This will help to ensure that youth achieve established goals and obtain desired career and educational outcomes. Taking into account individual needs, abilities and goals, the Individualized Service Strategy must map out anticipated progress. Local Areas must ensure that each WIOA Youth Program provider develops an Individualized Service Strategy with each youth participant after he or she has been objectively assessed. When developing the Individualized Service Strategy, the Youth Program career planner and participant must jointly take the objective assessment results into account.

The career planner must also take the performance measures into account when developing goals for the Individualized Service Strategy. In the Individualized Service Strategy, career pathways must be identified and must, at a minimum, include an examination of short-term and long-term:

- education goals;
- employment goals;
- appropriate achievement objectives or benchmarks/milestones; and,
- appropriate services.

Once completed, Local Areas must ensure that the ISS is signed by the Youth Program career planner and the participant. Local Areas must ensure that each participant receives a signed copy of his or her Individualized Service Strategy as record. If an Individualized Service Strategy has been developed for a participant to pursue another education or training program within the last quarter, then the WIOA Youth Program provider may use the existing Individualized Service Strategy to fulfill program requirements. The Youth Program career planner must review the Individualized Service Strategy with each youth participant every 90 days, at a minimum, to review progress and make necessary adjustments. As the Individualized Service Strategy is a living document that should be adjusted as the participant and case manager deem necessary, Youth Program career planners should update the document to reflect changes. Examples of updates include, but are not limited to: participant progress; completed activities or benchmarks, rewriting new goals once objectives have been met, outlining a clear direction or career pathway for the participant, changes to household status, legal name changes, address changes, and, other updates to contact information.

Based on assessment results and the Individualized Service Strategy, Local Areas must ensure that providers offer youth participants access to WIOA Youth Program elements that will support attainment of a secondary school diploma, entry into post-secondary education, and career readiness. All activities must be documented within the MWE. The WIOA Youth Program consists of 14 key program elements:

1. Tutoring, skills training, and dropout prevention;
2. Alternative secondary school services;
3. Paid and unpaid work experiences;
4. Occupational skills training;
5. Leadership development opportunities;
6. Supportive services;
7. Mentoring;
8. Follow-up services;
9. Counseling;
10. Concurrent education and workforce preparation activities;
11. Financial literacy education;
12. Entrepreneurial skills training;
13. Labor Market Information (LMI);
14. Preparing for Post-Secondary Education and training.

Whereas program elements 1-9 were offered under WIA, elements 10-14 are new with WIOA. DLLR has provided policy guidance to Local Areas on each program element and will continue

to offer support to help Local Areas achieve related goals. DLLR's policy on the WIOA Title I Youth Program clearly states that Local Areas must ensure that providers offer youth participants access to each of the 14 key program elements. If the WIOA Title I Youth Program provider does not directly offer all program elements, it must ensure that strong partnerships and referral mechanisms are in place to provide access to each element, as necessary. Through ongoing monitoring and technical assistance, DLLR and the Local Areas will ensure that access is effectively provided to youth participants.

- (4) Provide the language contained in the State policy for "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for "requiring additional assistance to complete an education program, or to secure and hold employment" criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII).

**"REQUIRES ADDITIONAL ASSISTANCE TO COMPLETE AN EDUCATIONAL PROGRAM, OR TO SECURE AND HOLD EMPLOYMENT"**

WIOA sections 129(a)(1)(B)(iii)(VIII) and 129(a)(1)(C)(iv)(VII) define eligibility criteria for the WIOA Title I Youth Program. For in-school youth and out-of-school youth, one criterion is that an individual is low-income and requires additional assistance to enter or complete an educational program or to secure or hold employment. Maryland's Local Areas will be required to define what it means to "require additional assistance to enter or complete an educational program or to secure or hold employment."

- (5) Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define "not attending school" or "attending school," indicate that is the case.

## ALTERNATIVE EDUCATION

At the federal level, an alternative school is defined as a public secondary school that addresses needs of students that typically cannot be met in a regular school, provides nontraditional education, serves as an adjunct to a regular school, or falls outside the categories of regular, special, or vocational education. As of September 2014, Maryland offers 89 alternative education programs in 22 of the State's 24 local school systems. Of these programs, most target students with behavioral issues, students who were in contact with law enforcement, and/or students who were having academic difficulties, as evidenced by low grades or being behind grade level. Many also target students with attendance problems. Additional information on alternative education can be found in the following ICF International report dated September 2014: [http://ies.ed.gov/ncee/edlabs/regions/midatlantic/pdf/REL\\_2014038.pdf](http://ies.ed.gov/ncee/edlabs/regions/midatlantic/pdf/REL_2014038.pdf)

## ATTENDING SCHOOL & NOT ATTENDING SCHOOL

While Maryland law does not define "attending school" and "not attending school," it does provide guidance on who is within the age of compulsory school attendance. Effective July 1, 2015, each child who resides in Maryland and is five years old or older and under 17 shall attend

a public school regularly during the entire school year, unless the child is otherwise exempted due to attainment of a high school diploma or GED®; is receiving regular, thorough instruction during the school year in the studies usually taught in the public schools to children of the same age or has completed such instruction; is married; is active military; attends an alternate education program; or is within any other exemptions listed in Education Article, §7-301, Annotated Code of Maryland. Effective July 1, 2017, the age for compulsory public school attendance will change to ages 5-18.

(6) If not using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition.

## BASIC SKILLS DEFICIENT

Scores below Low Adult Secondary Education are considered to be basic skills deficient. Per WIOA Section 3(5), an individual is to be considered “basic skills deficient” if he or she is an individual: (1) who is a youth, that has English reading, writing or computing skills at or below the 8th grade level on a generally accepted standardized test; or, (2) who is a youth or adult that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society. Like WIOA Title II adult education service providers, WIOA Title I Youth providers will be expected to follow all DLLR policy guidance on basic skills and English language assessments.

## **IF REQUESTING ANY WAIVERS, INSERT HERE**

### **TITLE I-B ASSURANCES The State Plan must include assurances that:**

The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;

The State has implemented a policy to ensure Local Areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program’s Disabled Veterans’ Outreach Program (DVOP) specialist;

The State has established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of Local Board members;

The State established written policy and procedures to ensure Local Boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);

Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;

The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in Local Areas throughout the State in determining the distributions;

The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);

The State distributes adult and youth funds received under WIOA equitably throughout the State, and no Local Area suffers significant shifts in funding from year-to-year during the period covered by this plan;

If a State Workforce Development Board, department, or agency administers State laws for VR of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;

The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.

The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor Local Areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);

## **VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS**

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

### **WAGNER-PEYSER ACT PROGRAM (Employment Services)**

#### **(a) Employment Service Professional Staff Development.**

(1) Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers.

In the 2016 State Plan, the WIOA partners dedicated “[w]ith every regulation promulgated pursuant to the federal Act, with every guidance issued by the federal agencies charged with oversight of the programs included in this Plan, with every technical assistance and training received, Maryland dedicates to learn together.” Since then, a WIOA Professional Development work group was formed to consider training needs and opportunities. The key goals of the Professional Development work group were to develop a systems approach to professional development needs, determine best practices for the administration of professional development, and ensure partner integration and cross-training opportunities.

Recommendations were generated by the work group to create opportunities for WIOA partners, including Wagner-Peyser, to promote professional development. The goal is to build a competent, cross-functional team capable of operating in a number of disciplines and able to move flexibly between roles, locations, and funding streams to provide seamless delivery of services. As part of each classification, certifications will be required to advance to higher levels. Staff will have access to professional development activities to support attainment and maintenance of certifications. A training matrix is under development to identify staff needs and progress.

Beginning in 2018, the State will utilize the “The Hub” for virtual training and workforce system resources. “The Hub” is a learning management system available to all Maryland State agencies that is maintained by Maryland’s Department of Budget and Management (DBM). In 2017, DLLR utilized WIOA implementation funds to purchase licenses for this state learning management software for the benefit of local partners. The WIOA partners will use the Hub as the platform on which state and local partners, including Wagner-Peyser staff, will be able to access a variety of training modules and resources. “The Hub” has the capacity to create two home pages: one for DLLR-DWDAL internal training content and a second for content added by external partners. The external home page presents an excellent opportunity to facilitate improved service integration across the system. For example, each partner can post a “101” module that provides other partners with the basics on that organization’s mission, target audiences, resources, key initiatives, etc.

Maryland is committed to the professional development of its staff and all WIOA partners. Leveraging “the Hub” and other resources will allow the partners to learn from each other and better assist their common customers.

(2) Describe strategies developed to support training and awareness across core programs and the UI program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to DUI staff for adjudication.

Secretary Kelly M. Schulz declared 2017 the “Year of UI.” The Secretary focused the divisions within DLLR toward greater collaboration between workforce development and unemployment insurance. The increased collaboration drives initiatives toward the reemployment of claimants.

As a result of the increased collaboration, DWDAL and the Division of Unemployment Insurance have entered into conversations and trainings to outline the ways in which AJC staff will be educated on the correct information and services they can provide to UI claimants. Ongoing information and training will also be provided to Wagner-Peyser staff in the AJCs.

Under Title III of WIOA, the Wagner-Peyser Act, a greater emphasis is placed on providing services to UI claimants with referrals to additional AJC services. This is in an effort to ensure claimants remain eligible for UI benefits and to provide meaningful assistance in their efforts to regain employment. Labor exchange services, which are the primary services provided under Wagner-Peyser, fall under the basic career services identified in WIOA. Wagner-Peyser staff must use funds authorized by WIOA to provide basic career services.

In 2017, the State implemented the Reemployment Exchange module within MWE. Maryland’s purchase of the REX module allowed the State to establish a single web-based application for both workforce registration and filing of unemployment claims. The common registration function allows for seamless transition between UI and workforce platforms. Integration of the two systems provides a centralized data system and coordinated registration for UI claimants to enter and perform necessary tasks while collecting unemployment insurance benefits. Upon completion of a UI registration, a Wagner-Peyser (WP) registration is automatically created. Rather than seeking the same data elements, requiring the claimant to spend more time on entering and re-entering information into both systems, which is the case currently, the REX module allows for the claimant to focus on what is important: reemployment.

Through the purchase of the REX module, Maryland is becoming more proactive in its reemployment activities. Immediately after an individual files an initial UI claim or a UI weekly certification in REX, the system will, as it is being implemented into the State’s UI modernization effort, automatically create a reemployment roadmap for the individual. This is a plan designed to get the claimant back to work.

Implementing a robust, online system will facilitate the sharing of information in real time between the UI benefits system and MWE. This, in turn, will ensure proper payments are made and those claimants are actually meeting the goals set for them by the State’s workforce and UI staff. This requires, and requires, the continued cross-training between workforce and UI staff.

(b) Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through AJC centers, as required by WIOA as a career service.

In collaboration with workforce development program managers, DUI staff will continue to provide training and technical assistance as needed. AJC offices have access to fact sheets,

developed by DUI, available that provide basic instruction on how to apply online or via telephone for an initial claim. For customers that need additional intensive assistance, staff will be trained by DUI to assist with online application and telephone claims. DUI staff will be available by phone and email to answer specific questions AJC staff may not be able to provide. Claimants will be able to reach subject matter experts at 410-767-3246 or [wayne.cooper@maryland.gov](mailto:wayne.cooper@maryland.gov). Wagner-Peyser, ROW, and RESEA staff have been provided training by DUI staff to answer most common questions posed. In addition a FAQ site will be available: <http://www.dllr.state.md.us/employment/unemployment.shtml>.

(c) Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals.

DWDAL and the DUI work collaboratively to provide workforce development opportunities to all non-job attached claimants in Maryland. This will be accomplished utilizing a variety of strategies including initial mailers from DUI describing the requirement for enrollment and call in of claimants for RESEA or ROW for UI claimants. Under the Maryland UI law, claimants must register in Maryland's AJC system within five days of receiving the UI pamphlet. Claimants must register either in person by visiting their nearest AJC career center or via the internet at <https://mwejobs.maryland.gov/vosnet/Default.aspx>. A list Maryland's AJCs is included as part of the mailed pamphlet.

WIOA increases connections between the job training and employment services and the UI system. Maryland will offer its full array of AJC Services as options for reemployment services to UI customers, including basic and individual career services and training services under WIOA. UI claimants will benefit from the enhanced services, including the labor exchange services and career guidance that are included as career services under Title I as well as activities that assist workers in identifying and obtaining jobs in in-demand industries and occupations. Maryland utilizes permanent Wagner-Peyser staff to conduct RESEA activities under Title III WIOA changes. From the UI first pay list, claimants most likely to exhaust benefits are selected to take part in the RESEA program along with UCX claimants. The remaining claimants will be assigned to the ROW. RESEA claimants may be referred to ROW as a result of the RESEA after the eligibility review and if determined that it will assist in reducing the length of unemployment. Historically, Maryland's WPRS system identifies between 20,000-30,000 claimants annually. Maryland's purchase of the REX module will allow the State to establish a single web-based common intake portal for both workforce registration and filing of unemployment claims. The common registration function will allow for seamless transition between UI and workforce platforms.

(d) Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate including the following:

(1) Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

The goal of reemployment in Maryland is to ensure claimants are engaged with their local AJCs beyond the initial mandatory contact for continued eligibility. Labor Exchange staff are an important part of the strategy to keep claimants engaged in the centers. As part of this strategy,

Labor Exchange staff provide reemployment services to claimants during the one on one assessment interviews for RESEA. Staff will make appropriate referrals to programs based on assessment of need during the meeting.

The elements which comprise Maryland's RESEA are AJC Orientation, Labor Market Information provision, Individual Reemployment Plan, Referral to Reemployment and Training Services, and Eligibility Review Interview. As part of the program, claimants are required to complete two additional services within 30 days. Claimants and trainers mutually agree upon which of the array of AJC services are most beneficial to assist in a job search. Examples of AJC program referrals may include WIOA training, the Professional Outplacement Assistance Center (POAC), and specific training for ex-offenders, GED® seekers, seniors, and other targeted populations. The mutually agreed upon service is recorded in MWE and on the claimant's Individual Employment Plan. The trainer follows the Individual Employment Plan to assure compliance with the agreement. If a claimant fails to follow through on agreed upon reemployment services within 30 days, they are referred to UI for adjudication.

The ROW provides reemployment assistance to UI claimants not served by the RESEA program. ROW trainers provide services at AJCs. The goals of the program include shortening the duration of UI and connecting UI claimants to Wagner-Peyser programs. The delivery of reemployment services involves a coordinated approach, involving DUI, Wagner-Peyser, and WIOA Title I staff. ROW is open to all jobseekers, whether they are a current UI claimant or employed, dependent on available space.

Each identified profiled candidate is contacted regarding participation in a job finding and career enhancing workshop for a six hour presentation that covers, at a minimum, the job acquisition process, which includes self-assessment, career transition, employment related correspondence, and interviewing. Local programs are encouraged to provide well-rounded programs with additional topics for customers and partners. Each workshop participant will know by the end of the workshop that successful employment is the ultimate goal, and all AJC staffers are available to assist with their job search. Each workshop completer receives targeted and specific job search assistance, beginning in the workshop, with emphasis on appropriate and necessary Labor Market Information.

Self-assessment instruments, access to supportive services and partner agencies, and individual and group counseling (career guidance) are available. The workshop includes referral and access information to program staff, training, and additional resources. In addition, local training staff can access lists of workshop completers to provide follow up inquiries to potential dislocated workers. Job matching services, one-on-one conferences, follow-up activities, and meetings are used as tools to help customers obtain rapid reemployment. Each workshop participant is contacted for follow-up assistance and additional services. To further support the reemployment strategy, videos and concentrated mini workshops, delivered by partners or Wagner-Peyser staff, are used to provide additional assistance in areas of identified need.

Workshops are available that address interviewing skills, application preparation, résumé writing, social media, and job searches on the Internet. Participants access services and attend workshops at the AJC. They also receive referrals to upcoming job fairs and employer

recruitment events and link with other AJC partners. Partners participate in the RESEA program and ROWs and/or provide information on-site or through their websites. Participants who need additional training to obtain employment are assisted through WIOA programs.

With increasing numbers of LEP individuals filing UI claims, Maryland is responding to the need for Spanish-language workshops. Workshop materials have been translated into Spanish, and a Spanish-speaking workshop facilitator has been hired to provide Spanish-language workshops in the areas with the largest numbers of LEP claimants. The Spanish language facilitator will be available to the rest of the State as numbers increase to provide services to claimants. In addition, the Spanish language facilitator has developed value added workshops as additional workshops/seminars for ROW and RESEA claimants for follow up services.

DWDAL and the DUI continue to work collaboratively to ensure that staff questions, concerns, and challenges are quickly identified and addressed. There is great importance attributed to the fact that DWDAL and the DUI's administration meet regularly, to orient themselves toward the highest standards for the RESEA program. Also, the RESEA Program Administrator and the UI Administrator jointly host regular program staff meetings to allow for frequent training and technical assistance in such areas as UI eligibility issues, fact finding processes, data system operations and reporting, site-specific issues from a more global perspective, and integration of the RESEA program into the AJC fabric. USDOL recently cited how impressed they were by the level of communication between DUI and DWDAL as it relates to collaborative work with UI claimants.

## **(2) Registration of UI claimants with the State's employment service if required by State law;**

DWDAL and the DUI work collaboratively to provide workforce development opportunities to all non-job attached claimants in Maryland. This will be accomplished utilizing a variety of strategies including initial mailers from DUI describing the requirement for enrollment and call in of claimants for RESEA or ROW for UI claimants. Under the Maryland UI law, claimants must enroll in Maryland's AJC system within five days of receiving the UI pamphlet. Claimants must enroll either in person by visiting their nearest AJC career center or via the internet at <https://mwejobs.maryland.gov/vosnet/Default.aspx>. A list Maryland's AJCs is included as part of the mailed pamphlet.

Using the WPRS, Maryland selects all non-job attached claimants who have received initial payment. By identifying these claimants, the Office of Workforce Development/UI can: 1. Engage claimants sooner; 2. Provide reemployment services to more claimants faster; 3. Ensure claimants are fulfilling work search requirements; and 4. Refer claimants who may be non-compliant with Maryland UI law for adjudication. Maryland worked with the USDOL to update its current methodology and will integrate the new methodology when UI modernization is completed in 2018. The decision was made to begin clean and to allow focus on completion of modernization for a seamless transition. Once the methodology is fully updated, every two years it will be reviewed and adjusted to reflect current economic conditions. By having a current methodology, Maryland can provide a wide-reach of relevant reemployment services to meet customers' needs. Maryland offers its RESEA Program to claimants profiled as most likely to

exhaust benefits. ROW continues to be an available service for all other claimants as a path to reemployment.

Soon after filing a claim, profiled claimants are sent a letter, which schedules them for one of the workshops immediately after selection. The letter reinforces the requirement to register in the MWE. Follow-up emails are utilized as reminders of required attendance. With all non-job attached claimants being profiled, DLLR can ensure claimants are fully engaged and registered within the workforce system. Trainers will verify that registration has been completed prior to the workshop.

Claimants identified as failing to register will be directed to do so prior to completion of the workshop. Failure to register, prior to or on the day of the workshop, will result in a referral to the DUI for adjudication. Claimants will be referred to UI for adjudication when identified that they failed to properly register. Upon receipt of a trainers' notification, UI will establish issues, as necessary, and will conduct a fact-finding interview to review and verify whether registration has occurred. If the claims specialist determines during the adjudication that registration was incomplete with no good cause, UI will impose a sanction until the claimant comes into compliance.

WIOA increases connections between the job training and employment services and the UI system. Maryland will offer its full array of AJC Services as options for reemployment services to UI customers, including basic and individual career services and training services under WIOA. UI claimants will benefit from the enhanced services, including the labor exchange services and career guidance that are included as career services under Title I as well as activities that assist workers in identifying and obtaining jobs in in-demand industries and occupations. Maryland utilizes permanent Wagner-Peyser staff to conduct RESEA activities under Title III WIOA changes.

From the UI first pay list, the WPRS will profile claimants weekly, with those profiled as most likely to exhaust assigned to the RESEA program along with UCX claimants. The remaining claimants will be assigned to the ROW. RESEA claimants may be referred to ROW as a result of the RESEA after the eligibility review and if determined that it will assist in reducing the length of unemployment. Historically, Maryland's WPRS system profiles between 20,000-30,000 annually.

The elements which comprise Maryland's RESEA are AJC Orientation, Labor Market Information provision, Individual Reemployment Plan, Referral to Reemployment and Training Services, and Eligibility Review Interview. Claimants and trainers will mutually agree upon which of the array of AJC services are most beneficial to assist in a job search. Examples of AJC program referrals may include WIOA training, POAC, and specific training for ex-offenders, GED® seekers, seniors, and other targeted populations.

The mutually agreed upon service is recorded in MWE and on the claimant's Individual Employment Plan. The trainer follows the Individual Employment Plan to assure compliance with the agreement. If a claimant fails to follow through on agreed upon reemployment services within 30 days, they are referred to UI for adjudication. The ROW provides reemployment

assistance to UI claimants not served by the RESEA program. ROW trainers provide services at AJCs. The goals of the program include shortening the duration of UI and connecting UI claimants to Employment Service programs. The delivery of reemployment services involves a coordinated approach, involving DUI, Wagner-Peyser, and WIOA Title I staff. ROW is open to all jobseekers, whether they are a current UI claimant or employed. Each identified profiled candidate is contacted regarding participation in a job finding and career enhancing workshop for a six hour presentation that covers, at a minimum, the job acquisition process, which includes self-assessment, career transition, employment related correspondence, and interviewing.

Local programs are encouraged to provide well-rounded programs with additional topics for customers and partners. Each workshop participant will know by the end of the workshop that successful employment is the ultimate goal, and all AJC staffers are available to assist with their job search. Each workshop completer receives targeted and specific job search assistance, beginning in the workshop, with emphasis on appropriate and necessary Labor Market Information. Self-assessment instruments, access to supportive services and partner agencies, and individual and group counseling (career guidance) are available.

The workshop includes referral and access information to program staff, training, and additional resources. In addition, local training staff can access lists of workshop completers to provide follow up inquiries to potential dislocated workers. Job matching services, one-on-one conferences, follow-up activities, and meetings are used as tools to help customers obtain rapid reemployment. Each workshop participant is contacted for follow-up assistance and additional services.

To further support the reemployment strategy, videos and concentrated mini workshops, delivered by partners or Wagner-Peyser staff, are used to provide additional assistance in areas of identified need. Workshops are available that address interviewing skills, application preparation, résumé writing, social media, and job searches on the Internet. Participants access services and attend workshops at the AJC. Participants also receive referrals to upcoming job fairs and employer recruitment events and link with other AJC partners. Partners participate in the RESEA program and ROWs and/or provide information on-site or through their websites.

Participants who need additional training to obtain employment are assisted through WIOA programs. With increasing numbers of LEP individuals filing UI claims, Maryland is responding to the need for Spanish-language workshops. Workshop materials have been translated into Spanish, and Spanish-speaking workshop facilitators provide Spanish-language workshops in the areas with the largest numbers of LEP claimants. Spanish-language services are available in the rest of the state as well.

DWDAL and the DUI continue to work collaboratively to ensure that staff questions, concerns, and challenges are quickly identified and addressed. There is great importance attributed to the fact that DWDAL and the DUI's administration meet regularly, to orient themselves toward the highest standards for the RESEA program. Also, the RESEA Program Administrator and the UI Administrator jointly host regular program staff meetings to allow for frequent training and technical assistance in such areas as UI eligibility issues, fact finding processes, data system operations and reporting, site-specific issues from a more global perspective, and integration of

the RESEA program into the AJC fabric. USDOL recently cited how impressed they were by the level of communication between DUI and DWDAL as it relates to collaborative work with UI claimants.

(3) Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and

Maryland utilizes permanent Wagner-Peyser staff to conduct RESEA activities under Title III WIOA changes. From the UI first pay list, the WPRS will profile claimants weekly, with those profiled as most likely to exhaust assigned to the RESEA program along with UCX claimants. The remaining claimants will be assigned to the ROW. RESEA claimants may be referred to ROW as a result of the RESEA after the eligibility review and if determined that it will assist in reducing the length of unemployment. Historically, Maryland's WPRS system profiles between 20,000-30,000 annually.

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The ROW provides reemployment assistance to UI claimants not served by the RESEA program. ROW trainers provide services at AJCs. The goals of the program include shortening the duration of UI and connecting UI claimants to Employment Service programs. The delivery of reemployment services involves a coordinated approach, involving DUI, Wagner-Peyser, and WIOA Title I staff. ROW is open to all jobseekers, whether they are a current UI claimant or employed. Each identified profiled candidate is contacted regarding participation in a job finding and career enhancing workshop for a six hour presentation that covers, at a minimum, the job acquisition process, which includes self-assessment, career transition, employment related correspondence, and interviewing.

Local programs are encouraged to provide well-rounded programs with additional topics for customers and partners. Each workshop participant knows by the end of the workshop that successful employment is the ultimate goal, and all AJC staffers are available to assist with their job search. Each workshop completer receives targeted and specific job search assistance, beginning in the workshop, with emphasis on appropriate and necessary Labor Market Information. Self-assessment instruments, access to supportive services and partner agencies, and individual and group counseling (career guidance) are available. The workshop includes referral and access information to program staff, training, and additional resources. In addition, local training staff can access lists of workshop completers to provide follow up inquiries to

potential dislocated workers. Job matching services, one-on-one conferences, follow-up activities, and meetings are used as tools to help customers obtain rapid reemployment. Each workshop participant is contacted for follow-up assistance and additional services.

To further support the reemployment strategy, videos and concentrated mini workshops, delivered by partners or Wagner-Peyser staff, are used to provide additional assistance in areas of identified need. Workshops are available that address interviewing skills, application preparation, résumé writing, social media, and job searches on the Internet. Participants access services and attend workshops at the AJC. They also receive referrals to upcoming job fairs and employer recruitment events and link with other AJC partners. Partners participate in the RESEA program and ROWs and/or provide information on-site or through their websites. Participants who need additional training to obtain employment are assisted through WIOA programs.

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Maryland profiles all non-job attached UI claimants that file a claim certification for request for payment. This is a change from the previous method of calling-in based on first payment of a claim. If a claimant does fail to report to a required job search activity a referral will be made to UI for review. This allows labor exchange staff to have claimants engaged within two weeks of filing for UI. Claimants that fail to report and register in the MWE are referred to unemployment staff for fact-finding and adjudication for their continued eligibility for benefits.

DWDAL and the DUI continue to work collaboratively to ensure that staff questions, concerns, and challenges are quickly identified and addressed. There is great importance attributed to the fact that DWDAL and the DUI's administration meet regularly, to orient themselves toward the highest standards for the RESEA program. The RESEA Program Administrator and the UI Administrator jointly host regular program staff meetings to allow for frequent training and technical assistance in such areas as UI eligibility issues, fact finding processes, data system operations and reporting, site-specific issues from a more global perspective, and integration of the RESEA program into the AJC fabric.

#### (4) Provision of referrals to and application assistance for training and education programs and resources.

DWDAL and the DUI work collaboratively to provide workforce development opportunities to all non-job attached claimants in Maryland. This will be accomplished utilizing a variety of strategies including initial mailers from DUI describing the requirement for enrollment and call in of claimants for RESEA or ROW for UI claimants. Under the Maryland UI law, claimants must enroll in Maryland's AJC system within four weeks of receiving the UI pamphlet. Claimants must enroll either in person by visiting their nearest AJC career center or via the internet at <https://mwejobs.maryland.gov/vosnet/Default.aspx>. A list Maryland's AJCs is included as part of the mailed pamphlet.

WIOA increases connections between the job training and employment services and the UI system. Maryland will offer its full array of AJC Services as options for reemployment services to UI customers, including basic and individual career services and training services under WIOA. UI claimants will benefit from the enhanced services, including the labor exchange services and career guidance that are included as career services under Title I as well as activities that assist workers in identifying and obtaining jobs in in-demand industries and occupations.

### **MSFW Agricultural Outreach Plan**

- (i) Provide an assessment of the unique needs of Maryland's MSFWs (MSFWs) based on past and projected agricultural and MSFW activity in the State;**

Maryland's multi-billion dollar agricultural industry sector remains the largest commercial industry in the State.<sup>xl</sup> According to the United States Department of Agriculture's (USDA) National Agricultural Statistics Service, 12,256 farms were operating in the State in 2016, producing an annual economic impact of 2.2 billion dollars for the year. Consistent with national statistics, eighty-four percent of Maryland's farms are classified as family farms.<sup>xli</sup>

While the agricultural sector continues to flourish, the demand for farmworkers has seen an overall decline. The drop in field crop values from 2012-2106<sup>xlii</sup> set against a backdrop of rising farmland values may be driving a shift in some agricultural employers' investments. An increased focus on grain crops that utilize mechanization may also be contributing to decreased labor demands, since Maryland's MSFWs (MSFWs) have historically been employed in picking and packing fruits and vegetables.

Maryland's agricultural employers anecdotally report that the decreased need to labor has not eased an ongoing struggle to recruit qualified U.S. workers to meet their hiring needs. Employers compensate for the shortage of domestic workers by seeking temporary agricultural workers through the FLC H-2A program. The USDA's 2016 Annual Report indicates that Maryland ranks 34<sup>th</sup> in the nation for H-2A certifications, with 804 H-2A positions approved.

Both H-2A workers and MSFWs who work in Maryland face many of the same challenges confronted by farmworkers elsewhere. Access to affordable healthcare and dental services is limited for farmworkers who live and work in remote locations where reduced cost services are either unavailable or require significant travel. Some MSFWs have complained that they do not have enough secure storage space for their belongings during the off-season. Outreach staff will work with MSFWs on an ongoing basis to identify challenges and assist in addressing issues via referrals or other assistance, as appropriate.

- (ii) Provide an assessment of available resources for outreach;**

Maryland MSFW Outreach Workers provide coverage in counties across Maryland, visiting the places where MSFWs live and work to provide access to the full range of workforce development services. DLLR seeks to employ Outreach Workers who demonstrate proficiency in languages of the MSFW population to promote effective communication. In the Southern region of Maryland where agricultural activity is most concentrated, Telamon, the State's National Farmworker Jobs Program (NFJP) grantee, is collocated in the comprehensive AJC.

Mobile job centers equipped with computers are available in some Local Areas, enabling MSFWs to use the MWE system, a job search tool designed for job seekers, employers, training providers, workforce professionals, and others seeking workforce services. MWE provide fast access, in both English and Spanish, to a complete set of employment tools.

- (iii) Describe the proposed outreach activities planned by Maryland's DLLR, DWDAL (DLLR-DWDAL), including strategies on how to contact MSFWs who are not being reached by the normal intake activities conducted through the State's network of American Job Centers (AJCs);

DLLR's MSFW Outreach Workers regularly visit local farms to provide MSFWs with information on available employment services, offering brochures and handouts that describe where AJCs and other organizations and resources are located and how they can be accessed. During visits to agricultural worksites, Outreach Workers talk to MSFWs about farmworker rights, and explain the process for registering complaints with the Employment Service and Employment-Related Law system, assisting MSFWs in submitting complaints, as requested. Outreach Workers are trained to identify apparent violations of housing and safety regulations, and can provide MSFWs with information on a range of support services.

Outreach workers employ a variety of strategies to contact MSFWs who are not being reached by the normal intake activities conducted through the State's AJC network.

Outreach Workers:

- Partner with Telamon staff on visits to MSFW work sites, to promote the unique training opportunities available through NFJP, such as pesticide safety and heat stress safety classes;
- Attend meetings of organizations that serve the farmworker population to obtain current knowledge concerning activities in Local Areas.
- Monitor the MWE to identify MSFWs who register remotely. When a potential MSFW is identified through MWE, staff will contact the individual via phone, email or letter to provide information on the full array of AJC services and invite participation.

In addition, FLC staff provide information on farmworker rights, the Employment Service and Employment-Related Law system, and support services to any H-2A workers and MSFWs they encounter on work site visits.

- (iv) Describe the activities planned for providing the full range of employment and training services to the agricultural community, including both MSFWs and agricultural employers, through Maryland AJCs.

DLLR's MSFW outreach staff visiting agricultural worksites share information with MSFWs on AJC services and resources, and encourage MSFWs to avail themselves of these opportunities. Outreach workers will provide MSFWs with information related to bilingual assistance, educational and training programs, health clinics, day care services, transportation resources, and immigration assistance, as appropriate.

Business services staff and FLC staff may both work with agricultural employers to help them assess and meet their workforce needs. FLC staff specialize in assisting agricultural employers to

manage local, regional, national and international recruitments, conduct crew leader registrations, and connect with relevant government and community agencies. FLC staff will help agricultural employers navigate the FLC application process and understand the prevailing wage rate. In addition to direct services to employers, FLC staff will be responsible for conducting wage surveys, crop surveys and farm labor surveys in various regions of the State. FLC staff assist with inspections of housing in conjunction with local health department officials and in the inspection of migrant labor camps. In addition, recruitment of year round and seasonal farm labor and writing agricultural job orders, reviewing and processing clearance orders.

Migrant Seasonal Farmworker training will be provided yearly in two phases for all AJC state staff and for interested partner staff. Once in January of the year for all Wagner-Peyser staff and a refresher training will be held in July for all staff working in MSFW outreach.

**WAGNER-PEYSER ASSURANCES The State Plan must include assurances that:**

The Wagner-Peyser Employment Service is co-located with AJC centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3));

The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW AJC centers;

If a State Workforce Development Board, department, or agency administers State laws for VR of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and

State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations.

## **VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS**

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

### **VI. Adult Education and Family Literacy Program**

Adult education; Literacy; Workplace adult education and literacy activities; Family literacy activities; English language acquisition activities; Integrated English literacy and civics education; Workforce preparation activities; or Integrated education and training that—

- (a) Aligning of Content Standards
- (b) Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The Maryland DLLR has adopted the College and Career Readiness Standards (CCRS) Standards for Adults to align with the State's K-12 College and Career Readiness Standards. The standards establish the foundation for a rigorous education based on shared goals and expectations of what all Maryland high school graduates should know and be able to do in order to succeed in post-secondary education and careers.

To ensure alignment, DLLR will:

- Conduct an assessment to determine local adult education program needs for full integration of CCRS into their practice.
  - Gather data on effective models of statewide implementation.
  - Educate local adult education program leadership and instructional staff on the components of CCRS.
  - Create and deliver professional development and disseminate best practices for implementation in local programs.
  - Provide technical assistance to local adult education programs to determine critical shifts in instruction necessary to align with the CCRS and current high school equivalency assessments.
1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and

### *Local Activities*

Maryland's adult education and literacy activities focus on the adult education purposes described in the Adult Education and Family Literacy Act (AEFLA), otherwise referred to as Title II of WIOA.

Title II activities assist eligible adult participants in:

- Becoming literate and obtaining the knowledge and skills necessary for employment and self-sufficiency;
- Supporting their children's educational development;
- Attaining a secondary school diploma;
- Entering post-secondary education or training.

Maryland conducts a competitive application process to award grants to eligible providers, to operate programs that provide adult education and literacy activities. The State manages and coordinates the application process to ensure that service availability is maintained in every jurisdiction based on level of need. Grantees selected as Title II providers for Local Areas must submit annual non-competitive application documents in order to receive subsequent year funding.

Maryland ensures that:

- Adult basic education classes provide instruction for adults with low basic skills and low educational attainment, and help the most vulnerable adults gain access to the services they need;
- Adult secondary education instruction assists students functioning at the adult secondary education level to prepare for a high school diploma through the GED® or the National External Diploma Program (NEDP) and transition to post-secondary education and employment;
- English language acquisition services assist eligible participants to achieve competence in reading, writing, speaking and comprehension of the English language, as well as the math skills needed to attain a high school credential and successfully transition to post-secondary education and employment;
- All educational programming incorporates evidence-based practices, including the essential components of reading instruction, and contextualized educational content and workforce training are integrated to support participants in achieving their educational and employment goals.

## **2. Is for the purpose of educational and career advancement.**

### *Workplace Adult Education and Literacy Activities*

The following adult education and literacy activities are offered by eligible providers in collaboration with employers or employee organizations at worksites or off-site locations to promote improved workforce productivity:

- In partnership with businesses, adult education programs offer workplace literacy instruction in basic skills, GED® preparation, English language skills and Integrated English Literacy/Civics, to improve the skills and productivity of workers;
- Adult Education and Literacy programs collaborate with Local Boards (WDBs), AJCs (AJCs) and other workforce partners to market workplace literacy to businesses, including through the MWE;
- Approval may be granted for programs to use a portion of instructional funding for workplace literacy instruction and to negotiate payment or in-kind services from a business partner. Workplace education activities are also an allowable activity for WIOA Title I incumbent worker training;
- Professional development and technical assistance in workplace literacy are provided to local adult education programs.

### *Family Literacy Activities*

Family literacy activities are designed to take a collaborative two-generation approach to improving economic opportunity for Maryland families, moving them towards economic self-sufficiency. Family literacy activities assist eligible adult parents with one or more children aged birth through 16 to gain educational skills and credentials, attain employment, and become full partners in the education of their children.

### *English Language Acquisition Activities*

Maryland awards grants to eligible providers for the delivery of English Language instruction that assists adult immigrants and other English language learners to improve reading, writing, speaking and understanding English. Curriculum has been expanded to include basic numeracy and mathematics vocabulary, and to provide transitions to Adult Basic Education classes.

### *Integrated English Literacy and Civics Education*

Through the competitive application process, Maryland awards Section 243 funding grants to eligible providers to carry out Integrated English Literacy and Civics (IELC) instruction. Maryland's adult education population has seen a growth in foreign born students in recent years and a demand for English language instruction that also addresses employment needs. Grants are available to eligible providers in areas of high immigrant residence to provide specialized curriculum in which English language skills are aligned with Maryland's ESL Content Standards and taught concurrently with instruction on the rights and responsibilities of citizenship and civic participation, understanding American systems of government, education, healthcare etc. and participation in the workforce. Previous experiences with integrated education and training models demonstrated the importance of workforce preparation for immigrant populations. Integrated instruction that provides a cultural emphasis with focus on understanding the American workplace has assisted students in making a smoother transition to employment. IELC is offered concurrently with occupational training in a high demand industry leading to potential advancement along a career pathway. Adult education funding will be used to provide the

EL/Civics and workforce preparation components. Occupational training is funded through a partner.

### *Workforce Preparation Activities*

Maryland directs resources to maximize the rate at which students successfully transition from adult education programs to postsecondary education or training and employment. The State's implementation of the Integrating Career Awareness (ICA) curriculum and integrated education and training (IET) pilots demonstrated that students need to master preliminary skills in order to succeed in academic and career training. Therefore, the State's WIOA Title II workforce preparation activities, programs, and services are designed to assist participants in acquiring a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in using resources and information, working with others, and navigating systems. Beyond helping participants prepare for the rigors of a college curriculum and the transition to a work environment, Maryland's integrated approach equips them to enter and advance along career pathways by earning stackable industry-recognized and academic credentials that will help them maintain and build a competitive skill set. The State provides professional development and technical assistance to Local Areas to ensure that contextualized workforce preparation activities are included and effectively implemented in curriculum offerings.

### *Integrated Education and Training*

Maryland's Integrated Basic Education and Skills Training (MI-BEST) initiative is based on the renowned Washington State I-BEST model, which integrates adult literacy and occupational skills instruction concurrently with wrap-around supportive services. Early pilot programs demonstrated this model's effectiveness in increasing student retention, and accelerating progress through training. Maryland utilizes labor market intelligence to align occupational training with in-demand occupations or occupational clusters, positioning participants for educational and career advancement.

- The State's adult education program will continue to support the MI-BEST instructional model in partnership with organizations that fund occupational training in high-demand industry sectors, supporting participants in taking their first step along a career pathway.
- Maryland's adult education program leverages connections with the GWDB, the OWD in DLLR's DWDAL, Local Boards, AJCs, partner State agencies, philanthropic organizations, and other educational organizations to explore funding options to expand the reach and capacity of the MI-BEST initiative. The Maryland Adult Learning Advisory Council (MALAC) and the Adult Education and Career Pathways Workgroup serve in an advisory capacity to guide efforts to increase access to the MI-BEST program in jurisdictions throughout the State.
- Professional development and ongoing technical assistance is provided to local program administrators, teachers and workforce partners on best practices incorporating the experience of the MI-BEST and Accelerated Connections to Employment (ACE) programs including recruitment, training selection, team teaching, support services, employer participation, outcomes, and data collection.

- In FY 2017, adult education providers began collecting data on the number of enrolled adult education learners who have entered into pre-apprenticeships or full apprenticeships. The number is collected quarterly and shared with the Apprenticeship and Training Office at DLLR.

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

(c) Corrections Education and other Education of Institutionalized Individuals. Describe how the state will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II subtitle C, any of the following academic programs for:

Adult education and literacy activities;

Special education, as determined by the eligible agency;

Secondary school credit;

Integrated education and training;

Career pathways;

Concurrent enrollment;

Peer tutoring; and

Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

The Maryland Correctional Education program seeks to provide incarcerated individuals with high quality services that facilitate successful transition into Maryland's workforce and communities. Correctional Education provides academic, library, occupational, and transitional services to incarcerated students in state correctional institutions. The academic program includes Adult Basic Education, GED® Preparation, Special Education, English for Speakers of Other Languages, and a Postsecondary Education Program. The Library Services Program provides informational, research, and recreational reading services. The Occupational Program offers a variety of vocational programs with 12 nationally-recognized certifications. Transitional classes include life skills, financial literacy, introduction to computers, employment readiness and workforce development, and career exploration. Specific attention is given to academic, transitional and occupational students who are under 21 years of age to address their unique needs. Correctional Education prepares incarcerated students to become responsible members of their communities. Instruction is delivered in 19 state prisons and pre-release centers through the

Maryland Correctional Education Program, in partnership with the Maryland DPSCS, and in local detention centers through local adult education grantee programs. Funded programs will deliver academic instruction in adult basic education, adult secondary education and English language acquisition for incarcerated individuals to provide the resources and tools needed for transition to post-secondary education and training opportunities and unsubsidized employment. Within local detention centers, instruction is focused on improving basic academic skills and preparing for high school equivalency testing and providing the necessary credential for enrolling in post-secondary education or training or entering employment.

The need for Correctional Education in Maryland is well documented. The average reading level of the 19,332 inmates currently in the Maryland prison system is between the 5th and 8th grade. Less than half of these inmates have a high school diploma when they enter the correctional system. Correctional Education provides a comprehensive education program designed to meet the needs of students at all educational levels.

Pursuant to COMAR 09.37.02, education for certain inmates is a requirement. Within the state Correctional facilities, inmates with more than 18 months to serve on their sentence are required to take adult education classes if they do not have a high school diploma, unless they are exempt due to a medical, developmental, or learning disability. Special education is available for eligible students under the age of 21, supported by an inter-agency partnership. After earning a high school diploma, a number of transition offerings are available through the support of partner agencies and programs. Offenders are eligible for Correctional Education occupational programs or advanced education through a local partnering college or community college. Programs are designed to reduce recidivism by supporting incarcerated and formerly incarcerated individuals' access to career pathways opportunities through innovative approaches that support academic achievement and transition to post-secondary training. Students who have a high school credential may earn college credit at a four year Liberal Arts college or one of three community colleges. , Correctional Education has established MOU with Anne Arundel Community College, Hagerstown Community College, and Wor-Wic Community College to enhance the educational program statewide. Using funds from grants and other reimbursable sources, this partnership enables Correctional Education to provide additional continuing education, workforce skills training, and transition classes in facilities across the state. As a result, Correctional Education was able to expand the number of classes for students. The postsecondary education self-pay programs continued to be held at three prisons, MCTC, JCI, and ECIE in conjunction with Hagerstown Community College (HCC), Anne Arundel Community College (AACC), and Wor-Wic Community College (WWCC) respectively. Goucher College, through a private grant, continued to offer courses at two institutions, MCI-J and MCI-W that may be applied to a Bachelor's of Arts degree.

Certificates are available in occupations (Desk Top User Specialist, Office Administration and Business Management) aligned with in-demand industry requirements and may be applied toward an Associate's Degree upon release.

Correctional Education supports a number of competency-based occupational training programs which award a state or nationally recognized certificate upon completion.

During the 2016-2017 school year, 860 students received Occupational Certificates in the career programs offered below:

- Architectural CADD,
- pre-apprenticeship Electrical,
- Auto Body Repair,
- pre-apprenticeship Facilities Maintenance,
- Automotive Maintenance and Inspection,
- pre-apprenticeship HVAC/R,
- Building Maintenance,
- pre-apprenticeship Masonry,
- Diesel Automotive Technology,
- Fabric and Upholstery Cleaning,
- pre-apprenticeship Plumbing,
- pre-apprenticeship Sheet Metal,
- Furniture Upholstery,
- pre-apprenticeship Welding,
- Graphic Arts and Design,
- Print Communication,
- Introduction to Word and Excel,
- Roofing,
- Office Practice and Management,
- Small Engine Repair,
- Office Technology,
- Warehouse/Distribution,
- pre-apprenticeship Carpentry, and
- Woodworking/Finish Carpentry.

During the 2016-2017 school year, DLLR was awarded the Edward J. Byrne Memorial Justice Assistance Grant in the amount of \$41,425 through the Governor's Office of Crime Control and Prevention (GOCCP). This grant was awarded to create a Diesel Automotive Technology component to the already existing Automotive Program behind the fence. The funds supported the purchase of resources such as Diesel textbooks for students, as well as various instructional materials and equipment needed to implement a Diesel Training Program. The premise is to train incarcerated men at three schools (Maryland Correctional Training Center, Roxbury Correctional Institution and Maryland Correctional Institution-Jessup) so that they will be employable as entry level Diesel Service Technicians upon their release. Diesel Service Technicians and Mechanics inspect, repair, and overhaul buses and trucks. In addition, they maintain and repair any type of diesel engine.

Correctional Education is also in the process of working to establish a new Barbering Stylist Program during the 2017-2018 school year at two schools. Correctional Education is proposing to implement a Barbering Stylist Program for male inmates at Roxbury Correctional Institution (RCI) located in Hagerstown, MD and a program for female inmates at the Maryland Correctional Institution for Women (MCIW) in Jessup, MD. This new programming is of high

interest among the students and will provide them with an opportunity to earn the new Barbering Stylist License which is currently offered to both men and women. The proposed budget will allow each host school to purchase equipment and educational materials, provide training for the new barbering instructors, as well as assist each location with program set up and offer ongoing support to trouble shoot issues that may occur while training the inmates within the correctional facilities.

DLLR, in collaboration with the DPSCS will be piloting the use of electronic tablets in both academic and transition courses. The tablets are provided by American Prison Data Systems (APDS). APDS tablets provide inmates with secure monitored access to digital education, rehabilitation, and job training and job placement resources in a secure network environment. These tablets will be used to supplement and differentiate instruction. The chosen sites for this pilot program are The Maryland Correctional Institution for Women (MCIW) Education Department and The Brockbridge Correctional Facility (BCF). Both offer academic and transitional classes. These tablets were funded by a grant from the Governor's Office of Crime Control and Prevention submitted by the DPSCS.

Incarcerated individuals may also participate in internships, pre-apprenticeships, and nationally recognized non-union RAs. Maryland's intensive pre-release transition program prepares individuals for life outside of the institution and provides job readiness in collaboration with workforce partners. During the 2016-17 school year, the Correctional Education Transition Program curriculum is offered at 20 sites by 25 instructors with 2511 participants successfully completing courses during FY16. The following courses are offered in the Transition Program:

- Personal Assessment and Career Exploration,
- Employment Readiness Workshop,
- Financial Literacy,
- Health and Nutrition,
- Parenting,
- Introduction to Computers,
- Basic Keyboarding,
- Success at Work,
- Life Skills for Re-entry,
- Internet Job Search, and
- Re-entry and Employment Resource Skills Training.

Representatives from state workforce programs visit exiting ex-offenders and provide services post release to support their transition to employment. The state supports two state of the art AJCs that provide specialized services to this population. All applicants for sections 225, 231, and 243 funds compete for funds through the same competitive grant process. Applicants have direct and equitable access to apply for grants, and funding opportunities are announced in local newspapers and on the DLLR website. Each eligible provider desiring a grant shall submit an application containing information and assurances, as described and required in the Request for Proposals (RFP), including a description of how funds awarded will be spent and a description of any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities. Applications are reviewed by a review panel established by DLLR. The panel is composed of individuals with

expertise in adult education and literacy representatives from external organizations and DLLR personnel. The written grant proposals are evaluated using the same scoring criteria and rated and assigned numerical scores. Grants are awarded to eligible providers who are able to demonstrate effectiveness in providing adult education and literacy services and satisfy the 13 considerations detailed in Subtitle C Section 231 (e) and described in their grant proposals. Each of the considerations receives a weighted value in the scoring rubric. All prospective grantees have equal access to grant processes including announcement, technical assistance meeting, application and submission criteria and review process.

Structured Employment and Economic Development Corporation (SEEDCO) in partnership with Bon Secours Community Works has received Second Chance Act of 2007 Grant funds, making it the first RExO partner under the WIOA. Under the grant, SEEDCO and Bon Secours Community Works will establish the West Baltimore Career Pathways Collaborative to:

- (1) Prepare participants for career pathways in local demand sectors by providing access to training, education, job placement, and career development services;
- (2) Address basic needs and life issues that are barriers for success; and
- (3) Place participants in long-term, well-paying jobs.

The West Baltimore Career Pathways Collaborative will conduct this training-to-work adult re-entry project in Baltimore City and West Baltimore within Baltimore County. SEEDCO/Bon Secours will focus on the demand sectors and career pathways of:

- (1) Healthcare/Social Assistance,
- (2) Transportation/Warehousing/Logistics,
- (3) Manufacturing/Advanced Manufacturing, and
- (4) Construction.

**(d) Integrated English Literacy and Civics Education Program.** Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries.

Maryland awards grants to eligible providers to carry out a program of integrated English Literacy/Civics instruction through a competitive application process. Applicants are required to meet the same requirements as other WIOA Title II applicants. Grants are awarded to applicants that propose serving a significant number of English language learners and best address the following priority areas:

- Workforce participation
- The rights and responsibilities of citizenship
- Naturalization procedures
- Civic participation
- American government

**Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.**

Allocated funds are used to provide integrated instruction to adult English language learners, including those who may have professional degrees or certifications in their native countries, that will enable them to develop proficiency in the English language and in the skills needed to become effective parents, workers and citizens in the United States. Instruction includes evidence-based practices that honor cultural diversity and prepares adults for unsubsidized employment in high demand industries and occupations that lead to economic self-sufficiency. English language learners develop language and academic proficiency to prepare them to access post-secondary education.

Selected providers support the English language and civics portion of an integrated education and training program in partnership with an organization that funds the occupational training. Integrated EL/Civics instruction may also be used to provide funding for workplace education programs in partnership with business. Integrated EL/Civics instruction are contextualized to include academic and workplace preparation skills that provide English language learners with the skills needed to succeed in post-secondary education and develop an understanding of the American workplace, regional in-demand industries and occupations that lead to economic self-sufficiency.

Maryland was recently awarded a Literacy Information and Communication Systems English as a Second Language Pro Technical Assistance grant. Funds will be used to develop instructional practices that enhance the ability of local jurisdictions to effectively prepare English language learners for careers. The best practices developed in this initiative will be shared with all local providers.

Ongoing professional development in Integrated English Literacy/Civics and focused technical assistance are provided to local programs to ensure that effective practices are in place to support the goals of adult English language learners. Local providers of Integrated English Literacy and Civics Education are required to include a plan in their applications for the integration of activities and services with workforce development activities delivered in Local Areas. Maryland upholds the expectation that alignment of activities is achieved through a planning process prior to submission of applications.

**(e) State Leadership.** Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.

#### *Funding Required State Leadership Activities*

Stakeholder input on the State's adult educational programming is regularly sought from stakeholders serving on Maryland's Adult Learning Advisory Council (MALAC), to promote the alignment of adult education and literacy activities with those of other WIOA core programs. In addition to MALAC, which serves as a strategic advisory body, the State also convened the Adult Education and Career Pathways work group in 2016, tasking it with developing policy and creating and implementing a statewide career pathways system that supports the progress of adult learners across the education and employment continuum to achieve economic self-sufficiency.

#### *Professional Development*

High quality professional development programs are vital to ensuring that Maryland's adult learners obtain the best instruction possible. To improve the instruction provided pursuant to local activities required under Section 231(b) of WIOA, including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to the specific needs of adult learners and dissemination of information about models and promising practices related to such programs, Maryland's Adult Education programming:

- Allocates resources to promote the development and implementation of statewide, regional and local training activities for adult education practitioners to improve academic instruction, digital literacy and transitions to post-secondary education and employment
- Conducts an annual statewide needs assessment to provide the State agency with input from the provider network as well as other stakeholders
- Requires adult education teachers to receive professional development that will provide them with the tools to meet the new challenges in daily practice including college and career readiness standards for adult education and opportunities to learn more about the careers for which they are preparing their students
- Requires administrators of local provider programs receive professional development on the best practices for management and collaboration.

During 2017 Maryland laid the foundation for a platform that will allow the State's workforce system partners to learn together - a commitment included in the original iteration of this plan. Licenses have been purchased to use a state run learning management system (LMS), and training is now under development that will be available through the LMS. Licenses and access to training will be opened to all WIOA Title I and II entities and TANF partners as training products come online.

#### *Technical Assistance*

Maryland provides technical assistance to eligible providers of adult education and literacy activities receiving funds under Title II, including:

- the development and dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training; the role of eligible providers as an AJC partner to provide access to employment, education, and training services; and
- assistance in the use of technology, including for staff training, to eligible providers, especially the use of technology to improve system efficiencies. The adult education program will develop and maintain repository of information on research-based and best practices for adult literacy instruction and disseminate findings to local programs.

The State will also:

- Maintain a listserv of adult education providers for disseminating information about adult education
- Communicate regularly through a monthly conference call

- Develop a plan for disseminating information using an online platform of communication and staff development to improve system efficiencies

### *Monitoring and Evaluation*

Monitoring and evaluation is important to ensure the quality of, and the improvement in, adult education and literacy activities and the dissemination of information about models and proven or promising practices within the State. Maryland will ensure the collection and reporting of valid and reliable data consistent with the current state and federal data collection guidelines and requirements through:

- Maintaining the use of the LACES Management Information System database
- Providing training and technical assistance to all agencies using the system
- Conducting annual on-site monitoring of funded adult education program providers
- Providing feedback and information on improvement strategies/models
- Conducting other activities necessary to ensure compliance with federal and state requirements and to determine the effectiveness of the program.

### *Content and Models for Integrated Education and Training and Career Pathways*

In late 2017, Maryland committed \$1,000,000 of WIOA funding to invest in demonstration projects that support career pathway initiatives. The grant program, which is the first of its kind in Maryland, solicited innovative proposals from Local Areas to develop demonstration projects that increase training and employment opportunities for Marylanders lacking high school diplomas. Grant applicants were encouraged to prepare proposals for pilot interventions involving proven strategies, such as (but not limited to) pre-apprenticeship training, English Language Acquisition, distance learning, bridge programming, and pathways to employment for out-of-school youth. Community partners and adult education providers were encouraged to partner with Local Areas to participate in the opportunity.

### *Assessments*

Maryland has made significant progress in improving the coordination and alignment of initial assessments of literacy, numeracy and English language skills and the selection of testing instruments to facilitate co-enrollment and referrals between WIOA Title I and Title II programs. DLLR's Title I and II programs have jointly issued the Basic Education Skills and English Language Assessments Policy to establish unified standards for the following programs:

- WIOA Title I Adult Program;
- WIOA Title I Dislocated Worker Program;
- WIOA Title I Youth Program;
- WIOA Title II Adult Education & Family Literacy Act Program; and,
- Trade Adjustment Assistance for Workers Program (Trade Program).

Effective July 1, 2016, Maryland WIOA Title I Local Areas (where required) and WIOA Title II adult education providers are required to assess Adult Basic Education (ABE) or Adult Secondary Education (ASE) learners with the:

- Comprehensive Adult Student Assessment Systems (CASAS); and/or,

- Tests of Adult Basic Education (TABE).

WIOA Title I Local Areas (where required) and WIOA II adult education providers are required to assess English Language Acquisition (ELA) learners' EFL with:

- CASAS; and/or,
- TABE; and/or,
- TABE Complete Language Assessment System-English (TABE/CLAS-E); and/or,
- Basic English Skills Test (BEST) Literacy; and/or,
- BEST Plus.

#### *Permissible State Leadership Activities*

Maryland will seek to develop and implement the use of technology applications, translation technology, or distance education, including professional development to support the use of instructional technology. This will be accomplished through:

- Utilizing the distance learning program, Maryland i-Pathways, to prepare students to pass the GED® tests.
- Ensuring that all providers integrate Maryland's Adult Education Technology Standards in their practices.
- Assessing and addressing the need for professional development surrounding the utilization of technology in delivering instruction and teacher training.

Developing content and models for integrated education and training and career pathways is also a priority. In establishing career pathways, Maryland is dedicated to:

- Conducting a pilot program through LINCS for English language learners to develop teaching strategies for integrating education and training using contextualization concepts in teaching.
- Identifying and disseminating a model of best practices for career pathways design and implementation through the Adult Education and Career Pathways Work Group.

Maryland will assist eligible providers in developing and implementing programs that achieve the objectives of Title II of WIOA, and in measuring the progress of those programs in achieving such objectives. The State is also planning for integrating literacy and English language instruction with occupational skill training, including promoting linkages with employers. This can be accomplished by funding basic skills and GED® preparation and partnering with local workforce programs to conduct MI-BEST programming. In identifying curriculum frameworks and aligning rigorous content standards that specify what adult learners should know and be able to do in the areas of reading and language arts, mathematics, and English language acquisition; the following factors are considered:

- State adopted academic standards
- The current adult skills and literacy assessments used in the State
- The primary indicators of performance described in section 116

- Standards and academic requirements for enrollment in non-remedial, for-credit courses in post-secondary educational institutions or institutions of higher education are supported
- Where appropriate, the content of occupational and industry skill standards widely used by business and industry in the State.

Maryland is restructuring English Language Acquisition Content Standards to include integration of language acquisition and with workforce preparedness training. Further, professional development on integration of the College and Career Readiness Standards for adults with instruction for all students is utilized. By participating in a state interagency planning process with the WIOA Partners, Maryland's adult education providers will collaborate to leverage existing resources and avoid duplicating efforts, in order to maximize the impact of the activities described above.

**(f) Assessing Quality.** Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

Maryland assesses the quality of adult education providers using a combined desk and onsite monitoring approach. A combined approach of onsite and desk monitoring is used to assess quality in adult education programming. Each grantee is assigned to an Adult Education Program Specialist whose role is to provide monitoring and technical assistance to the grantees. Grantees analyze their program progress on a trimester basis and submit trimester data review reports to the Specialist. The reports include an analysis of data on enrollment, contact hours, student retention, and progress toward meeting performance goals. Specialists review the reports and provide follow up to the grantees. Technical assistance is offered as needed and professional development is recommended where indicated.

All AEFLA funded programs are required to review performance annually, identify any challenges that prevented meeting performance targets, and propose strategies to address these challenges. Proposals are reviewed by State Staff who provide technical assistance and make recommendations for additional strategies and professional development. Low performing programs may be assigned to a mentor from a high performing program. A Performance Based Funding formula provides a system to incentivize high quality programming using available instructional funding.

The LACES data system captures student demographics, enrollment and student progress and meets the requirements of the National Reporting System. Annual sampling of data from LACES is verified in onsite student records to ensure the validity of data entered at the program level. In the event that errors or inconsistencies are found, programs submit a Corrective Action Plan. Subsequent monitoring and technical assistance from state staff is provided to ensure that the required changes are implemented. Program leadership members work as a team to ensure compliance with the Data Quality Checklist, and meet with staff to review new procedures. A fiscal monitoring is conducted for all grantees using a risk analysis model. All programs are

monitored over a three year cycle; however, those with risk factors are prioritized for immediate review.

State staff regularly meet onsite with key local staff, provide timely technical assistance and ensure that state and federal regulations are adhered to in program practice. Assessing the quality of professional learning at both the state and local level supports high quality instruction and is essential to the operation of high professional development programs. The AELS office is responsible for implementing, and maintaining standards for professional learning and using standards to assess and evaluate state funded professional development for adult education.

The tools that AELS staff employ to ensure that professional development programming is addressing the targets for improving instruction in the local activities {required under section 231(b)} are based on Guskey's model for Five Critical Levels of Professional Development Evaluation, that include but are not limited to the following: annual needs assessment, state and local evaluation of materials, presentation and objective completion, workgroups for feedback and information in the field, state and local observation (program operation and instruction) and program outcome data.

Local programs submit a plan for professional development with their grant application detailing selection criteria, delivery method, target audience and method for evaluation. Documentation of local professional development is submitted and maintained on the state online file sharing system and reviewed by state staff. Documentation for all professional learning activities at the state and local level is maintained to ensure that programs are in compliance with all state required professional development. The State also serves as a resource for information on best practices, program models and uses a variety of methods to disseminate information. Aside from tradition email distribution, AELS has a centralized online repository for programs to access resources and information, as well as a monthly conference call or Webinar to communicate promising practices, activities and initiatives.

In evaluating the quality of professional development programs it is important to collect data using a variety of tools both quantitative and qualitative. Feedback from the State delivered foundation trainings and State facilitated sharing sessions for local programs' leadership team members provide data for evaluating the effectiveness of professional development activities.

(1) An emphasis on professional learning will be placed on local adult education providers incorporating the research-based components of phonemic awareness, system phonics, fluency, and reading comprehension. Reading test scores will be analyzed and evaluated at the state and local level to determine the impact, quality and need for changes in professional learning and adjustments will be made according to the results.

(2) Adult learning theory and the needs of adult learners will be the foundation of local adult education instruction. Professional learning activities will be planned and implemented to assist local programs in designing instruction with a basis in Knowles principles of andragogy, the learning needs specific to adult learners: need to be involved in planning and evaluation of instruction, experience as the basis for learning activities, immediate relevance and impact on work and life and problem-centered. Adult learner goal attainment and student education gain will be used to measure if students' involvement in planning and evaluation has been incorporated in the classroom. Additionally those measures are also used to address the

instructor's practice of designing instruction that is relevant to the student's life and work and based on students life experiences. Classroom observation can also demonstrate whether instructors using student experience as the basis for learning activities and is putting problem-centered instruction into practice. Data collected from observation, student goal attainment and educational gain will be used to analyze need and make changes and improvements future professional learning activities.

(3) Personnel both paid and volunteers are afforded foundation professional learning activities in accordance with state required topics/subject areas. These activities include but are not limited to, assessment, College and Career Readiness standards, ESL content standards, essential components of reading, and numeracy. Instructors will be prepared in these core areas in order to implement instruction to support student educational gain and goal attainment. Program and State staff review program data to evaluate the pre/post-test match, as well as student test score gains in reading, math, English language skills to evaluate the quality of the activities, this data will be used for continuous improvement for the foundation professional learning activities.

(4) AELS disseminates information on promising practices and instructional models to local programs and stakeholders in adult education using a variety of methods. Professional learning sharing sessions, leadership team workgroups, meetings, email , as well as centralized online repository help programs access current adult education programing and instruction information. All meetings and sharing sessions are evaluated not only by participant evaluation but also feedback and observation on models or practices that have been implemented as a result of the receiving the information. The results of the evaluation and observations determine the effectiveness of the dissemination processes, adjustments are made as necessary to ensure that all relevant information is being distributed efficiently and effectively.

**ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS AND ASSURANCES States must provide written and signed certifications that:**

The plan is submitted by the State agency that is eligible to submit the plan;

1. The State agency has authority under State law to perform the functions of the State under the program;
2. The State legally may carry out each provision of the plan;
3. All provisions of the plan are consistent with State law;
4. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;
5. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;
6. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and
7. The plan is the basis for State operation and administration of the program.

**The State Plan must include assurances that:**

1. The eligible agency will expend funds appropriated to carry out title II of the WIOA only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions);
2. The eligible agency will ensure that there is at least one eligible provider serving each Local Area, as defined in section 3(32) of WIOA;
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible

- individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;
4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities;
  5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and
  6. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.

## **VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS**

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

### **Vocational Rehabilitation**

The VR Services Portion of the Unified or Combined State Plan 13 must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

- (a) Input of state Rehabilitation Council. All agencies, except for those that are independent consumer-controlled commissions, must describe the following:
  - (1) input provided by the state Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

The MSDE's DORS is a key component of Maryland's WIOA system. DORS offers programs and services that help students, youth, and adults with significant disabilities achieve their goals of post-secondary education, training, and careers. DORS administers the public VR program through the following branches:

- **The Office of Field Services** prepares people with disabilities to become employed or assists them in maintaining their employment. VR counselors located in offices throughout Maryland provide or arrange for services that may include career counseling, Assistive Technology, vocational training, and/or job placement assistance. The Office of Field Services also provides Pre-Employment Transition Services to high school students with significant disabilities, to assist them in preparing for a seamless transition from high school to post-secondary education, vocational training, and employment.
- **The Office for Blindness and Vision Services** specializes in helping people whose primary disability is blindness or vision loss go to work and remain independent in their homes and communities. The Office for Blindness and Vision Services also provides Pre-Employment Transition Services to high school students with significant visual disabilities. Finally, the office oversees the Maryland Business Enterprise Program for the Blind. This program prepares individuals who are legally blind to operate vending, gift, or food service businesses in public facilities.
- **The Workforce and Technology Center** is a comprehensive rehabilitation facility that offers career assessment services, career and skills training, job placement assistance, Assistive Technology services, Pre-Employment Transition Services, and other medical and support services to consumers who are referred from the Office of Field Services and the Office for Blindness and Vision Services.

#### *Input and Recommendations by the state Rehabilitation Council*

The Maryland State Rehabilitation Council (MSRC) was established under the 1992 Amendments to the Rehabilitation Act. The Council is made up of individuals who are interested in the success of public VR programs. Maryland State Rehabilitation Council members are appointed by the Governor and include representatives from education, rehabilitation, employment, industry, and consumer advocacy groups.

The Council reviews, analyzes, and advises DORS about issues, such as service provision, eligibility, strategic planning, and consumer satisfaction. MSRC members meet quarterly, perform extensive committee work, and help with informal consultation. The MSRC provides year-round formal and informal consultation to DORS, particularly at scheduled quarterly full Council meetings, at committee meetings, and during an annual DORS/MSRC executive planning meeting. Meeting minutes document discussions and recommendations. Additionally, DORS provided members of the MSRC Policy and Planning Committee with the following documents, so the committee could offer formal recommendations for the agency's strategic planning needs:

- MSRC FY15 and 2016 Annual Reports,
- DORS FY15 and 2016 Outcomes,
- FY 2015 and 2016 Standards and Indicators,
- Consumer satisfaction survey results from the Office of Field Services and the Office for Blindness and Vision Services,

- DORS/MSRC 2015 and 2016 Public Meetings Report, and
- DORS 2016 Comprehensive statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland.

During FYs 2015 and 2016, MSRC played an active role in many activities with and in support of DORS. These included the following:

- Advocating for increased awareness of public VR programs and the VR services portion of the WIOA System outlined in the Maryland Combined State Plan, including educating stakeholders about the impact of the DORS waiting list on people with significant disabilities, pre-employment transition services to students with disabilities, and enhancing collaboration with workforce partners to promote the competitive integrated employment of individuals with significant disabilities;
- Facilitating statewide public meetings;
- Providing consultation and review for consumer satisfaction surveys;
- Providing review and analysis of Client Assistance Program outcomes and issues;
- Reviewing and analyzing a DORS employment and retention study;
- Contacting members of Maryland's General Assembly regarding the need to maintain state funding to address the needs of underserved populations and DORS staff vacancy rates, and to thank them for their continuing support of the public VR program;
- Actively participating in DORS strategic and annual planning process meetings;
- Expressed continued concern in the MSRC Annual Report regarding the lengthy waiting list of DORS consumers with significant disabilities on the waiting list for services;
- Participated in the Region three state Rehabilitation Councils' Community of Practice, the Council of state Administrators of VR, the National Council of state Agencies for the Blind, and the National Coalition of state Rehabilitation Councils; and
- Completing the DORS 2016 Comprehensive statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland.

#### *Recommendations from the Maryland State Rehabilitation Council*

The Maryland State Rehabilitation Council takes an active and visible role in how Maryland's public VR program is administered through a variety of activities, including:

- Reviewing, analyzing, and advising DORS regarding performance of its responsibilities and quality of its services;
- Ensuring that the needs of individuals with disabilities are identified and addressed by state and federal legislators, service providers, employers, and the community;
- Collaborating with organizations and other state councils to promote services to underserved and unserved populations; and
- Developing and reviewing state goals and priorities and assisting in the preparation of Maryland's annual State Plan for VR.

The Council presented the following recommendations to DORS following the comprehensive 2013 Statewide Needs Assessment:

1. The Council commends DORS for the progress made in developing a comprehensive QA case review process to be implemented no later than July 1, 2014. The Council

looks forward to hearing results of the initial “beta” year of implementation. The Council recommends that the agency address the methodology of consumer satisfaction surveys and explore web-based survey; consider strategies to expand sample size; reach underrepresented groups; preserve anonymity; and explore web-based surveys, follow-up phone calls, and other response methods.

2. The Council recommends that DORS develop training for staff to expand knowledge and understanding of disabilities and functional capacities; means to mitigate limitations, such as Assistive Technology; and impact on employment as a basis for providing effective career counseling.
3. The Council recommends that DORS continue collaboration with local providers, the Maryland Department of Disabilities, and the Developmental Disabilities Administration, at the state and local levels, as related to the *Employment First* initiative. This should include an exploration of programmatic barriers to success and cross-agency training needs.
4. The Council recognizes the continuing barrier that lack of transportation causes for individuals with disabilities seeking employment statewide. The Council will work with DORS staff to determine the status of federal and state transportation efforts that may improve transportation resources for individuals with disabilities.
5. The Council recommends that DORS continue to explore, identify, and implement innovative practices in job development and placement, including evaluating the effectiveness of the new Business Services Branch.
6. The Council is interested in following the benefits realized through the expansion of services at the Workforce and Technology Center for consumers who are deaf/hard-of-hearing, blind, visually impaired, deaf-blind, and on the Autism spectrum; and the Council recommends that the Workforce and Technology Center/DORS provide periodic updates to the Council on the effectiveness and utilization of these expanded services.
7. The Council recommends that DORS continue efforts to improve the effectiveness of the Agency’s website and social media in providing consumer information, public education, and outreach as a means of allowing stakeholders to provide feedback to the Agency.
8. The Council is supportive of the Agency’s three-year strategic plan and annual planning activities.
9. The Council recommends that DORS evaluate the characteristics, including receipt of public benefits, of individuals on the waiting list and determine, within the capacity of the agency and case management system, their outcomes in terms of employment. This is to have a better understanding of the true cost of individuals being on the DORS waiting list.
10. The Council discussed the issue of DORS serving eligible individuals who require specific services or equipment to maintain employment, regardless of DORS’ established order of selection and wait list of individuals with disabilities seeking DORS’ services. The Council discusses the impact of the decision, weighing both the costs and the benefits. The Council recommends maintaining current policies until additional information is available regarding the potential costs to the program.

DORS supports these recommendations and continues to be appreciative of the expertise of the

individuals who comprise the Maryland State Rehabilitation Council. Their passion for and commitment to supporting individuals with disabilities is without equal. DORS values their contributions of time and knowledge.

**(2) the Designated State unit's response to the Council's input and recommendations; and**

*DORS Responses to the Council's Input and Recommendations*

1. DORS looks forward to implementation of the QA case reviews over the next year and will keep the Council apprised of findings and effectiveness of the process and methodology. Additional efforts will be made by DORS in collaboration with the MSRC in addressing the consumer satisfaction survey methodology and tool.

Update 11/24/15- DORS' comprehensive QA case review process was implemented July 1, 2014, and expanded from a 12-month beta period to an 18-month review period. The final district review was completed on November 17, 2015. Data analysis is underway, and a final report will be present in early 2016.

2. DORS agrees that having a clear understanding of the disability, its impact on employment, and ways to lessen the impact of functional limitations is needed in order to provide effective career counseling and to help consumers select appropriate employment goals. DORS will develop a training series to address specific disabilities and will work with its WIOA partners to train staff throughout the workforce system through the Maryland WIOA Convening, the re-purposed WIOA Workgroups, and more.
3. DORS looks forward to continuing to collaborate with other agencies, including the WIOA partners, regarding *Employment First*. *Employment First* is an initiative that assures that employment is considered first for individuals with developmental/intellectual disabilities. DORS expects that there will be more progress toward *Employment First* in Maryland this coming year with new leadership in place at the Maryland Developmental Disabilities Administration.
4. DORS looks forward to working with the Council and its WIOA partners to determine the current status of transportation initiatives, to continue its efforts to work with other entities on transportation barriers, and to share information with all staff about transportation resources. DORS recognizes new opportunities may exist to leverage WIOA partners' ability to provide supportive services to shared customers, and DORS commits to explore these opportunities.
5. DORS has created a new Business Services Branch, including Regional Business Services Representatives. DORS is eager to determine the effectiveness of the new organizational structure and will advise the Council of their role and progress in helping individuals with significant disabilities in achieving competitive integrated employment. DORS will also ensure its Business Services Branch works collaboratively with its WIOA partners on the WIOA Business Service Team through communicating often and actively participating in the re-purposed WIOA Workgroups.
6. DORS will continue to include Workforce and Technology Center staff on the agenda of

the MSRC committee and full council meetings to update the membership on these innovative and effective practices.

7. DORS has developed new MSRC and agency websites and will continue to update its website and effectively use social media. DORS will look for opportunities to highlight individuals with disabilities in social media and websites of its WIOA partners.
8. DORS developed a Strategic Plan for 2014-2017, with input of the MSRC. As DORS continues to work closely with its WIOA partners on implementation through the WIOA Alignment Group and participation on the state's WIOA Work Groups, DORS looks forward to reviewing the Strategic Plan and monitoring outcomes with continued input from the MSRC.
9. DORS will determine what information may be gleaned from the case management system related to waiting list and benefits status, and advise the Council. Through its active participation in the WIOA Alignment Group, the WIOA Jobseeker Advisory Focus Groups (to be planned), and the re-purposed WIOA Workgroups, DORS will explore ways to better assist individuals with disabilities through the entire workforce system.
10. DORS will elect not to serve eligible individuals, regardless of the established order of selection, who require specific services or equipment to maintain employment. The issue will be reviewed regularly, with WIOA partners and the MSRC, to determine the need to revise this position.

(3) the designated State unit's explanations for rejecting any of the Council's input or recommendations.

The agency does not reject any of the recommendations.

(b) Request for Waiver of Statewideness. When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

- (1) a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;
- (2) the designated State unit will approve each proposed service before it is put into effect; and
- (3) requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

The Maryland DORS has not requested a waiver of statewideness.

(c) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System. Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

(1) federal, state, and local agencies and programs;

While DORS is committed to working collaboratively with its WIOA partners, it recognizes the importance of maintaining other strong partnerships to provide exceptional customer service to

businesses and individuals with disabilities. Cooperation with private and non-profit service agencies, related government agencies, and other professional organizations has long been a cornerstone of public VR in Maryland. Such collaborations help to overcome the complex and multiple barriers that confront people with disabilities who want to work or stay independent in their communities.

The Division maintains cooperative agreements, MOU and membership on Interagency Councils and Local Committees, and other collaborative initiatives and projects with agencies and organizations outside the workforce development system.

*(1) Cooperative Agreements*

- Department of Health:

Behavioral Health Administration – This cooperative agreement, most recently updated effective December 2011, addresses referrals between agencies and specifies shared responsibilities for funding of supported employment, as well as cross-training for staff.

Developmental Disabilities Administration – MSDE, DORS, and the Maryland Department of Health, Developmental Disabilities Administration updated and approved the Cooperative Agreement, Employment Services in October 2013. It focuses on implementation of *Employment First* in Maryland and addresses referral between agencies and specifies shared responsibilities for funding of supported employment. It also describes cross-training activities.

- Maryland Association of Student and Financial Aid Administrators - This cooperative agreement specifies the process for defining unmet financial need for higher education and the requirements for PELL Grant and scholarship applications. It also outlines the process for sharing information to determine the amount of assistance DORS can provide to a student for tuition and other educational costs.
- Workers' Compensation Commission– This agreement describes the referral process and the procedure for submitting rehabilitation plans to the Commission to determine if costs will be covered by an insurer.
- MSDE– The Intra-Agency Cooperative Agreement on Transitioning specifies areas of cooperation among the Divisions of Student, Family, and School Support Services; Special Education/ Early Intervention Services; Career and College Readiness; and Rehabilitation Services specific to transitioning students and youth with disabilities.

*MOU*

- An MOU exists between DORS, the Department of Health's—Behavioral Health Administration, and the Developmental Disabilities Administration that authorizes the issuance of vouchers for the Maryland Disability Employment Tax Credit. This MOU remains in effect and will be reviewed later this year.

*Interagency Councils and Local Committees*

DORS maintains an active presence on numerous statewide interagency councils within and beyond the WIOA workforce system.

Within the WIOA System, DORS actively participates on the following committees and groups:

- GWDB Interagency Committee;
- Maryland Adult Learning Advisory Council;
- The state's re-purposed WIOA Work Groups; and,
- The WIOA Alignment Group.

Beyond the WIOA System, DORS regional and field offices, the Workforce and Technology Center, and the Office for Blindness and Vision Services also maintain active working relationships with many local committees and initiatives.

*Statewide:*

- Maryland Statewide Independent Living Council
- Maryland Developmental Disabilities Council
- Maryland Mental Health Advisory Board
- Department of Health, Traumatic Brain Injury Advisory Committee
- Interagency Transition Council for Youth with Disabilities Under Executive Order 01.01.2007.13 (Interagency State Plan for Transitioning Students with Disabilities)
- The Maryland Coordinating Committee for Human Services Transportation
- Department of Health/Developmental Disabilities Administration, Maryland Department of Disabilities *Employment First* The Maryland Library for the Blind and Physically Handicapped Advisory Board
- Local Coordinating Councils
- Maryland Special Education state Advisory Committee

*Other Collaborative Initiatives and Projects*

DORS collaborates with the Department of Disabilities, a cabinet level agency, and is represented on the following committees/workgroups:

- SUCCESS - post-secondary education for individuals with intellectual disabilities;
- The annual Americans with Disabilities Act Celebration committee; and
- Quarterly meetings between the Maryland Department of Disabilities Secretary and DORS Director to discuss state and national disability topics, project updates, etc.

DORS supports/collaborates with Maryland Department of Disabilities during the legislative session on issues of importance to the disability community.

All committees bring together a variety of Maryland agencies that supply programs and services to individuals with disabilities.

There are also agreements with the Maryland School for the Blind and the Maryland School for the Deaf covering referral procedures, evaluation, individualized planning, and follow-up. The Office for Blindness and Vision Services (OBVS) sponsors summer programs with the Maryland School for the Blind at the Workforce and Technology Center.

*Other collaborations:*

- Supported Business Enterprise — DORS works with the Developmental Disabilities Administration and the Behavioral Health Administration to assure that self-employment

is a viable career option for individuals with cognitive and psychiatric disabilities. Supported Business Enterprise is a form of self-employment for individuals who, because of their disability, require supports to operate their business. While the consumer must perform a core function of the business, extended service providers support certain activities and related functions to assure successful operation. All businesses operate within an integrated employment setting.

- Blind Industries and Services of Maryland — DORS provides state-aided grants support services to individuals with vision loss, including rehabilitation teachers, aids and devices, and Braille production.
- Community Colleges - Autism Supports — DORS has agreements with certain Maryland Community Colleges for designated Workforce and Technology Center staff to work collaboratively on their campuses with the college Disability Support Services staff to provide supports required by students with Autism spectrum disabilities. DORS has expanded the Pathways program to include Montgomery College, Howard Community College, and the three campus sites of Community College of Baltimore County. With the expansion of this program, a new position will be added to the staff at WTC, which will offer the opportunity for expansion to other Maryland colleges.
- PROMISE Initiative — Maryland was one of six sites selected in September 2013 to participate in the U.S. Department of Education's PROMISE initiative. The goal of the initiative is to improve education and career opportunities for young people receiving Supplemental Security Income through the Social Security administration. It is a partnership of state agencies, including DORS, and private sector disability organizations. Led by the Maryland Department of Disabilities, the initiative involves research to determine the most effective methods to assist young people and their families to become more self-sufficient.
- Reaching Independence through Self-Employment (RISE) Program — the RISE Program has been a program of DORS since 1997, with program training, guidance, and support services provided by a Community Rehabilitation Program. Its mission is to present self-employment as a realistic and viable vocational option to individuals with significant disabilities who are eligible for DORS services. RISE Program staff work with individuals and their families, rehabilitation professionals, and the business community to facilitate and encourage the successful launch and operation of consumer-owned businesses.
- Maryland Work-Based Learning Collaborative (Way 2 Work) — DORS, in collaboration with University of Maryland, currently manages a 5-year demonstration grant awarded by RSA for Local Education Agencies (LEAs) to provide work-based learning experiences for students receiving pre-employment transition services. Funding awards for 2-year implementation periods have been granted to LEAs in four counties, and DORS will grant funding for up to four more LEAs in February 2018.

(2) State programs carried out under section 4 of the Assistive Technology Act of 1998;

- The Maryland Technology Assistance Program (TAP) is a program of the Maryland Department of Disabilities. The mission of the program is to enhance the lives of Marylanders with disabilities and their families by helping support access to Assistive Technology devices and services. The program assists people with disabilities in obtaining assistive devices and remaining independent in their communities by providing services, such as information and referral, Assistive Technology demonstrations, option

to borrow assistive technologies for a limited time, Assistive Technology re-use program, and low interest rate loans for purchase of Assistive Technology devices.

- The Maryland Technology Assistance Program and DORS partner in demonstrating Assistive Technology devices.
- DORS serves as a member of the Maryland TAP Advisory Committee.
- Maryland TAP and DORS are members of the Governor's Interagency Transition Council for Youth with Disabilities.
- DORS partners with Maryland TAP to coordinate and provide Assistive Technology training to DORS staff.

**(3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;**

The Maryland DORS does not carry out any programs for Rural Development of the Department of Agriculture.

**(4) Non-educational agencies serving out-of-school youth; and**

DORS provides vocational services to out-of-school youth with disabilities in collaboration with Community Rehabilitation Programs licensed through the Maryland Department of Health—for either Developmental Disabilities Administration and/or the Behavioral Health Administration employment services as well as Community Rehabilitation Programs that are DORS accredited.

**(5) State use contracting programs.**

DORS does not carry out any programs for state use contracting programs.

**(d) Coordination with Education Officials. Describe:**

**(1) The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.**

DORS considers service provision to high school students with disabilities and their families a high priority. The agency coordinates services with local educational agencies in order to identify diploma and certificate students with disabilities and to provide services designed to help them prepare for and achieve employment and self-sufficiency. VR services and Pre-Employment Transition services are coordinated both at the statewide level as well by regional directors and supervisors on a local level.

**(2) Information on the formal interagency agreement with the State educational agency with respect to:**

**(A) consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;**

DORS is an organizational unit of the MSDE. DORS, therefore, is a signatory and partner in implementation of the Maryland Intra-agency Cooperative Planning Agreement for Secondary Students with Disabilities. This is an agreement with three other cooperating Divisions within MSDE: the Division of Special Education/Early Intervention Services; the Division of Career Technology; and the Division of Student, Family, and School Services. The agreement identifies

the roles and responsibilities of the cooperating Divisions at the state and local level, including the process for technical assistance and training to schools; assurances for the development and completion of the Individualized Education Program that is coordinated with the development of the Individualized Plan for Employment within 90 days of an Eligibility determination or off-delayed date; financial responsibilities and methods to resolve disputes; and referrals, including those students with disabilities at risk of dropping out, having been suspended or expelled. High School students with disabilities are referred for VR Services during the fall of their next to last year in secondary school. Schools also provide information to families and high school students, who are at least 14 years old but less than 22, regarding Pre-Employment Transition Services available through DORS. The Intra-agency Cooperative Planning Agreement for Secondary Students with Disabilities is in the process of being updated to incorporate changes as a result of the WIOA of 2014.

#### *Local Agreements*

Upon finalization of the updated Maryland Intra-agency Cooperative Planning Agreement for Secondary Students with Disabilities, DORS and local education agencies will update local cooperative agreements to clarify roles and responsibilities at the local level as appropriate. DORS also maintains local cooperative agreements with the Maryland School for the Blind and the Maryland School for the Deaf regarding appropriate transition services for these underserved student populations.

#### *State Law – Counselor Assignment to Secondary Schools; Completion of the Individualized Plan for Employment*

Maryland State Law requires that DORS assign a counselor to each public secondary school in the state to promote effective transition. It also requires that DORS complete the Individualized Plan for Employment for eligible students with disabilities within 90 days of an Eligibility determination or off-delayed date.

#### *The Governor's Interagency Transition Council for Youth with Disabilities*

By state law, DORS is a permanent member of the Governor's Interagency Transition Council for Youth with Disabilities, reissued as Executive Order 01.01.2007.13. DORS collaborates with 26 other Council members, including WIOA partners (DLLR, DHS, and the GWDB), other state agencies (Department of Health, Maryland Technology Assistance Program, Maryland Higher Education Commission, and the Maryland Department of Juvenile Services), representatives of schools, disability advocacy groups, and individuals with disabilities and their families. The purpose of the Council is to promote effective transition services for students with disabilities throughout Maryland. This includes outreach to students and referral to DORS and other agencies that can be of assistance.

(B) transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

DORS maintains a Staff Specialist for Transition position to lead the following activities:

- Coordinate all VR and Pre-Employment Transition Service activities and projects with other WIOA partners to facilitate access to WIOA Programs, such as the Youth Program, the career pathways system, and apprenticeship programs. Also coordinate with other

state agencies, community organizations, public and private facilities, local DORS field offices, and employers.

- Collaborate with the DORS Grants Administrator and WIOA partners in responding to federal and state transition requests for proposals and in implementing cooperative agreements.
- Develop, update, and monitor transition documents in collaboration with WIOA partners in responding to federal and state transition requests for proposals and in implementing cooperative agreements.
- Provide program information to state level transition personnel and to the local education agencies through in-service training and publications.
- Serve as consultative staff for the Governor's Interagency Transition Council for Youth with Disabilities.
- Facilitate an intra-agency transition group for counselors who provide transitioning services for the purpose of information sharing and ongoing training.
- Provide guidance to community rehabilitation programs and providers submitting proposals for the provision of pre-employment transition services.

(C) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

DORS maintains a Staff Specialist for Transition position to lead the following activities:

- Coordinate all VR and Pre-Employment Transition Service activities and projects with other WIOA partners to facilitate access to WIOA Programs, such as the Youth Program, the career pathways system, and apprenticeship programs. Also coordinate with other state agencies, community organizations, public and private facilities, local DORS field offices, and employers.
- Collaborate with the DORS Grants Administrator and WIOA partners in responding to federal and state transition requests for proposals and in implementing cooperative agreements.
- Develop, update, and monitor transition documents in collaboration with WIOA partners in responding to federal and state transition requests for proposals and in implementing cooperative agreements.
- Provide program information to state level transition personnel and to the local education agencies through in-service training and publications.
- Serve as consultative staff for the Governor's Interagency Transition Council for Youth with Disabilities.
- Facilitate an intra-agency transition group for counselors who provide transitioning services for the purpose of information sharing and ongoing training.
- Provide guidance to community rehabilitation programs and providers submitting proposals for the provision of pre-employment transition services.

(D) procedures for outreach to and identification of students with disabilities who need transition services.

- DORS will facilitate activities to bring state of the art transitioning services to Maryland's students and families, including the following Pre-Employment Transition

Services as outlined in the WIOA: job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy.

- DORS will continue to explore, develop, and expand new initiatives and methodologies that promote the provision of Pre-Employment Transition Services and successful post-school outcomes, including the following: work experience, employment, post-secondary education and training, community participation, independent living, and healthy lifestyles. These initiatives will be accomplished through a variety of cooperative agreements, cooperative funding agreements, special grants, or other innovative means.
- DORS will work with local businesses and agencies, as needed, to expand opportunities for work experience, internships, mentoring, and summer employment experiences as a way to prepare students for viable careers.
- DORS will identify opportunities to provide information and outreach materials for transitioning students and their families.

**(e) Cooperative Agreements with Private Nonprofit Organizations.** Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

Cooperative Agreements are developed between DORS and approved Community Rehabilitation Programs in order to assure a mutual understanding of the services to be provided to DORS consumers, referral procedures, expectations, and responsibilities of all parties. The Division utilizes Community Rehabilitation Programs to the maximum extent feasible to provide a wide range of highly skilled VR services to individuals with disabilities around the state. DORS continually assesses the needs of individuals with disabilities, recruits new organizations, and expands services with existing ones in order to meet those needs.

*DORS Accreditations*

Accreditation of Community Rehabilitation Programs is an important factor in the operation of the state VR program in Maryland. The purpose of these reviews and accreditations is, as follows:

- To improve the quality of services delivered to individuals with disabilities;
- To assist the governing board of the Community Rehabilitation Program and other interested groups in the community to better understand what is required for a sound program; and
- To serve as a means for self-evaluation by the board, administrator, and staff.

*The Accreditation Process*

DORS purchases services from Community Rehabilitation Programs that are accredited, operate in compliance with federal regulations, and operate in compliance with the regulations for Title I, VR Services Program implementing the Rehabilitation Act Amendments of 1992, Section 361.51.

These Community Rehabilitation Programs must hold accreditations from a national organization such as the Commission on Accreditation of Rehabilitation Facilities (CARF), or

may also be in “deemed” status, having been accredited by other Maryland government agencies, such as the Department of Health. Otherwise, the DORS staff specialist for community rehabilitation programs will perform onsite accreditations every three years. The specialist, along with a local DORS staff person, advises the Community Rehabilitation Programs on what is required and then conducts an onsite review to examine all resource documents, consumer files, and details about programs. As appropriate, Community Rehabilitation Programs staff may attend the overview and exit conferences.

If the program demonstrates its ability to serve DORS consumers, a cooperative agreement is drafted for approval and signature. The agreement outlines roles, responsibilities, and fees.

#### *Services Purchased by DORS*

DORS purchases a wide variety of services that assist people with disabilities to reach independence and employment. These may include pre-employment transition services, Assistive Technology services, employee development services, job coaching, skills training, and specialized services such as those for individuals with an acquired brain injury.

DORS may also purchase job-coaching services from CRPs that have supported employment programs approved by the Behavioral Health Administration and the Developmental Disabilities Administration.

DORS will also purchase career assessment services which include community based assessment provided by private vendors who are Certified Vocational Evaluators or Professional Vocational Evaluators.

(f) **Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.** Describe the designated State agency’s efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

DORS enters into cooperative agreements with the Developmental Disabilities Administration and the Behavioral Health Administration in order to provide for increased interagency cooperation, to ensure the maximum utilization of appropriate programs and resources in the provision of services to individuals with disabilities, to expand and improve services to individuals with significant disabilities, and to maximize the use of comparable benefits.

Formal written agreements set forth terms and conditions under which DORS and another agency or organization will cooperate in the provision of services. These formal interagency cooperative agreements will: identify policies, practices, and procedures that can be coordinated among the agencies (particularly definitions, standards for eligibility, the joint sharing and use of evaluations and assessments, and procedures for making referrals), identify available resources, define the financial responsibility of each agency for paying for necessary services (consistent with state law) and procedures for resolving disputes between agencies, and include all additional components necessary to ensure meaningful cooperation and coordination.

### *Evidenced Based Supported Employment*

DORS has implemented a Milestone Payment system for psychiatric rehabilitation programs approved by the Behavioral Health Administration to provide Evidence-Based Supported Employment services. The Milestone Payment system significantly streamlines provision of services for DORS and provider staff by substantially reducing preparation of authorizations and invoices, tracking of hours of services, and simplifying reporting.

### *Employment First*

DORS is a partner with other state agencies (including WIOA partner, DLLR) and Community Rehabilitation Programs in implementing *Employment First*, a national effort to assure that all individuals, including those with significant disabilities, consider employment on a preferred basis in planning for their lives. *Employment First* is consistent with DORS' belief that individuals with disabilities, even the most significant disabilities, can work in meaningful positions in integrated settings when provided with adequate, appropriate supports. Supported employment is appropriate for individuals in *Employment First* and is the means to assure the best chance for success in employment. Benefits planning is an important part of services for individuals served through *Employment First*.

### *Governor's Employment Program for Persons with Acquired Brain Injury*

The Governor's Employment Program for Persons with Acquired Brain Injury (ABI Project) provides intensive VR and long-term supports to individuals with acquired brain injuries. This often includes needed neuropsychological and other assessments, training, supported employment services, and long-term job coaching.

Individuals with acquired brain injuries often do not qualify for long-term supports offered through the Behavioral Health Administration for people with chronic mental illness or the Developmental Disabilities Administration for individuals with developmental disabilities. This program includes periodic meetings of DORS staff assigned ABI Project cases, DORS managers and staff of CRPs serving individuals with acquired brain injuries, and includes a training component.

The ABI Program allows DORS to identify and serve 50 individuals annually with traumatic brain injuries with intensive and continuous service delivery with community partnerships. DORS is working with Community Rehabilitation Programs and other organizations to provide the necessary services, including job coaching, to eligible individuals. A unique aspect of this program is that DORS provides the funding for the long-term job coaching support as part of the post-employment services for individuals.

Update: To remain in compliance with WIOA, DORS discontinued providing funding for extended supported employment services for adults who have an acquired brain injury (ABI Program) as of June 30, 2017.

Working with its partners, DORS continues to offer training opportunities to its staff and staff of WIOA and community partners to provide current information and research regarding acquired brain injury, as well as, effective strategies related to VR services for youth and adults.

(g) Coordination with Employers. Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

(1) VR services; and

Businesses must play a central role in the workforce system and in coordination with its WIOA partners. DORS is well-positioned to expand engagement with businesses to provide for quality VR services and employment outcomes. Like its WIOA partners, DORS has embraced the dual-customer model and has been building capacities over the last several years for dedicated positions tasked with employer outreach and engagement, as well as technical assistance to VR counselors and consumers.

DORS has created a Business Relations Branch that includes a Program Manager and seven regional Business Services Representatives. This organizational structure ensures statewide oversight, information sharing, collaboration, and a team approach to employer engagement. The Business Relations Branch works closely with the agency's Workforce and Technology Center Employment Services to coordinate services to employers that enhance services and employment outcomes for consumers. Workforce and Technology Center's training advisory committees engage employers in specific industries to ensure training programs are in line with industry needs and standards, and the Workforce and Technology Center's Work Readiness Programs work with community employers to develop worksites for students. Additionally, the Workforce and Technology Center's Rehabilitation Technology Services is a key component to serving employers through its worksite services.

Currently, DORS Business Services Representatives participate alongside DLLR state and local workforce business services representatives in quarterly statewide training that includes effective skills, strategies, and collaboration for business outreach and quality services, business and industry-specific information, and real-time and projected labor market and economic development information. The WIOA partners and their Business Services Team agree to work together in order to ensure quality customer service to businesses. In frequent communication, the WIOA Business Services Team will develop a deeper understanding of the services each partner offers, and, after understanding a business's needs, will be able to refer the businesses to the services of fellow team members.

The DORS Business Relations Branch and Employment Services at the Workforce and Technology Center meet and participate in quarterly training to enhance team capacities in working with employers to expand employment and work-based learning experiences.

These structures and collaborative activities ensure that DORS is prepared and able to effectively engage with businesses to meet their workforce needs. The activities also provide the best information on careers, business needs, Labor Market Information, and opportunities to jobseekers so that they can make informed choices on their employment goals and access programs and services that lead to successful outcomes.

(1) DORS will build relationships with businesses that result in improved career development and competitive-integrated employment outcomes for consumers through the following activities:

- Promoting and marketing the employment of persons with disabilities by networking and developing active partnerships with businesses and business-related organizations, such as Chambers of Commerce, Society of Human Resource Managers, Business Leadership Networks, WIOA partners in the state's AJCs, DLLR, state and Local Boards, and statewide and local economic development offices. Regional Business Services Representatives will be visible and available to area businesses and will serve as a single-point-of-contact, leading to improved business relations and access.
- Training and technical assistance to employers and WIOA partners to promote the awareness of the skills and benefits that people with disabilities can bring to their workforce. Types of training include: information on DORS services and training programs, disability awareness, requirements of the Americans with Disabilities Act, and federal contractor compliance with Section 503. Group training opportunities for businesses will be offered, as well as individual consultation and need-driven training for specific employers.
- Providing consultation on and support to remove disability-related obstacles to employment and the provision of reasonable accommodations for recruitment, work-based learning activities, on-boarding, and retention of employees, including Assistive Technology and worksite assessments. Business Services Representatives will serve as points of contact for businesses needing guidance, and the Workforce and Technology Center Rehabilitation Technology Services unit will provide specific and applicable worksite services for consumers and employers.
- Providing information and resources on hiring incentives, including tax credits and on-the-job training wage reimbursements. Business Services Representatives will provide technical assistance to businesses in completing any required forms to access incentives.
- Facilitating and coordinating recruitment activities for business partners who are interested in hiring DORS consumers, including advertisement, pre-screening, interview preparation of consumer applicants, providing interview venues, referral, and follow-up. Job openings and recruitment activities will be shared via email with counselors, consumers, and Community Rehabilitation Programs, and jobs will be posted and tracked in the AWARE Employer module.
- Collaborating with WIOA partners, including DLLR business solutions representatives, and economic development partners to leverage business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities.
- Coordinating with the WIOA Business Services Team and AJCs in recruitment events and job fairs, including recruiting businesses and facilitating the inclusion of DORS consumers in the talent pool.
- Engaging with businesses interested in hiring people with disabilities through VR National Employment Team (NET) connections and activities. This includes NET conference calls, webinars, and events with business partners and facilitating the inclusion of Maryland consumers in the national Talent Acquisition Portal.
- Partnering with Community Rehabilitation Programs to facilitate communication and collaboration among business services representatives and employment specialists in

- sharing business contacts, job openings, and strategies on job placement for consumers; this includes expansion of regional Job Placement Networks.
- Providing business and industry-specific career information and training sessions for consumers.
- Developing and monitoring of work-based learning and resume-building opportunities, such as internships, job shadowing, disability employment awareness month activities, volunteering, and on-the-job training, including expanding programs already in place, such as the Governor's QUEST Internship Program and the federal agency VR internship programs.
- Promoting the federal Workforce Recruitment Program to businesses and consumers.
- Engaging businesses in Training Program Advisory Committees at DORS' Workforce and Technology Center to ensure training programs meet business and industry needs and standards and to facilitate work-based learning and employment opportunities.
- Coordinating with businesses to develop community worksites for students in Workforce and Technology Center's Work Readiness 2 Program. Students spend a portion of their day during the six-week program at a business worksite learning and performing job tasks.
- Developing customized training programs for DORS' consumers based on business-specific workforce needs.
- Collaborating with strategic partners, such as the Maryland Department of Disabilities, colleges and universities, and federal, state, and local governments to connect employers and consumers.
- Supporting and promoting state industry-led workforce training initiatives of the WIOA system, such as pre-apprenticeship and RA programs and Maryland's EARN program to DORS consumers.
- Connecting DORS consumers with businesses and employment opportunities through the MWE.

DORS Business Services Representatives will provide technical assistance to both counselors and consumers related to job readiness, career information, labor market analysis, and real-time and projected employment opportunities gleaned through active engagement with businesses, business-related organizations, and WIOA partners.

**(2) transition services, including pre-employment transition services, for students and youth with disabilities.**

DORS will work with employers to develop and expand work-based learning for students and youth with disabilities through the following activities:

- Awareness opportunities on careers, industries, Labor Market Information, and workforce needs, including workshops or other training that includes employer speakers and presentations, career fairs, and workplace tours;
- Preparation activities that teach workplace skills, job readiness, interview skills and practice, and self-advocacy in application and employment processes;
- Exploration and skill-building opportunities to include job shadowing and mentoring, volunteering, internships, on-the-job training, and employment;
- Development and coordination of pre-employment transitioning programs through community colleges, schools, Community Rehabilitation Programs, and AJCs;

- Expansion of current internship programs, such as QUEST, to include students and transitioning youth; and
- Promotion of summer youth employment programs to businesses and students.

(h) **Interagency Cooperation.** Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

(1) the State Medicaid plan under title XIX of the Social Security Act;

DORS will work with the Maryland Medicaid agency toward establishing a cooperative agreement, as outlined in WIOA. DORS and the state Medicaid agency will collaborate in developing strategies to maximize resources and develop opportunities for competitive integrated employment for individuals with disabilities.

(2) the State agency responsible for providing services for individuals with developmental disabilities; and

DORS has entered into a cooperative agreement with the Maryland Department of Health, Developmental Disabilities Administration (DDA), to provide for increased interagency cooperation, to ensure the maximum utilization of appropriate programs and resources in the provision of services to individuals with disabilities, to expand and improve services to individuals with significant disabilities, and to maximize the use of comparable benefits. The agreement sets forth terms and conditions under which DORS and DDA will cooperate in the provision of services. The formal interagency cooperative agreement identifies policies, practices, and procedures that are coordinated between DORS and DDA (particularly definitions, standards for eligibility, the joint sharing and use of evaluations and assessments, and procedures for making referrals). It also identifies available resources and defines the financial responsibility of each agency for paying for necessary services, consistent with state law and procedures for resolving disputes between agencies, and includes all additional components necessary to ensure meaningful cooperation and coordination.

DORS and DDA updated and approved the Cooperative Agreement, Employment Services, in October 2013. The agreement focuses on the implementation of *Employment First* in Maryland. It addresses referral between agencies, specifies shared responsibilities for funding of supported employment, and describes cross-training activities.

(3) the State agency responsible for providing mental health services.

DORS has also entered into a cooperative agreement with the Department of Health, Behavioral Health Administration. The cooperative agreement, most recently updated effective December 2011, addresses referrals between agencies and specifies shared responsibilities for funding of supported employment, as well as cross-training for staff.

(i) **Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development.** Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

(1) Data System on Personnel and Personnel Development

(A) Qualified Personnel Needs. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:  
(i) the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

DORS has established policies and procedures for a Comprehensive System of Personnel Development, which ensures that all personnel:

- Are well qualified,
- Regularly take part in staff development,
- Participate in performance-based evaluation systems, and
- Meet required licensing/certification standards.

Training, education, and developmental activities ensure appropriately skilled staff, with special emphasis given to rehabilitation technology, employer services, transitioning, and disability-specific (e.g., blindness) skills. This system strives to fill vacancies with well-qualified and culturally diverse applicants.

As part of the MSDE, DORS is required to adhere to personnel development policies and procedures contained in 34 CFR 300.15, 34 CFR 300-383, 20. U.S.C. 1413 (A) (3) and in the Code of Maryland Regulations 13 A., 05.01.03G.

(1) Data System on Personnel and Personnel Development.

(A) Qualified Personnel Needs.

DORS has a data system to annually obtain information on personnel and personnel development, as follows:

- The number of personnel who are employed by the state agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category.
- By December 31 of each year DORS will:
  1. Use the RSA A2 Report of September 30 to determine the number of DORS positions in provision of VR services (total number of DORS positions minus total number of Disability Determination Services positions).
  2. Determine the number of positions in the following categories:
    - a. Rehabilitation Counselors;
    - b. Administrative Staff;
    - c. Staff Supporting Counselor Activities; and,
    - d. Other.
  3. Determine the number of individuals served effective September 30 from the AWARE case management system.
- The number of personnel currently needed by the state agency to provide VR services, broken down by personnel category;

Using the MSDE Personnel Report of September 30, DORS will analyze the vacancy rate and vacancies in the specific categories. DORS will also consider total number of staff needed based on waiting list and other factors.

- Projections of vacancies in personnel, broken down by personnel category, needed by the state agency to provide VR services in the state in five years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.
  - Ascertain turnover rate for most recent federal FY; and,
  - Project vacancies over the next five years in light of current staffing and turn-over rate and other relevant factors.

(ii) the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Job Title	Current positions	Current vacancies	Projected Vacancies over next 5 years
Rehabilitation Counselors	174	15	75
Administrative Staff	64	2	10
Staff Supporting Counselor Activities	143	16	80
Other	9	1	5

(iii) projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in five years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Job Title	Current positions	Current vacancies	Projected Vacancies over next 5 years
Rehabilitation Counselors	174	15	75
Administrative Staff	64	2	10
Staff Supporting Counselor Activities	143	16	80
Other	9	1	5

(B) Personnel Development. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

(i) a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

Following is a description of DORS' system for collecting and analyzing data on personnel development on an annual basis:

- Compile a list of the institutions of higher education in the state that are preparing VR professionals, by type of program.
- Compile a list of programs in Maryland preparing VR staff at the Bachelor's, Master's, and certificate level.
- Determine the number of students enrolled at each of those institutions, broken down by type of program.
- Determine the number of students who graduated during the prior year from each institution with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

(ii) the number of students enrolled at each of those institutions, broken down by type of program; and

At the conclusion of each academic year, DORS will contact coordinators of programs at Maryland institutions of higher education to obtain information about the following:

- The number of students enrolled in each type of program,
- The number of employees sponsored by DORS or the US Department of Education, Rehabilitation Services Administration,
- The number of employees sponsored by DORS or the Rehabilitation Services Administration who have graduated,
- The number who have graduated, and
- The number who have graduated with certification or licensure or credentials required to achieve certification/licensure.

DORS staff will then determine personnel category of graduates who have certification, licensure, or credentials to achieve certification/licensure.

(iii) the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

#### *ANNUAL ANALYSIS/REPORT*

1. Compile data;
2. Analyze information compared to previous years and determine trends;
3. Based on data and trends, determine implications for rehabilitation services for individuals with disabilities in Maryland; and
4. No later than December 31, prepare a report of findings to include recommendations in Division planning and other activities, as appropriate.

Institution	Students Enrolled	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and/or RSA	Graduates from the previous year
Coppin state University	170	03	01	18
George Washington University	48	03	01	19
Towson University	(not available)	(not available)	(not available)	(not available)
University of the District of Columbia	38	0	0	10
University of Maryland: ES	357	0	0	59

\* 2016 data. NOTE: This is the first year Towson University is listed as a collegiate resource; data is being requested, and will be included in the next state plan.

**(2) Plan for Recruitment, Preparation and Retention of Qualified Personnel.** Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

- Annually take the information and recommendations from the Data System described above regarding current and projected needs for personnel;
- Based on findings, design a recruitment plan for the upcoming year in collaboration with colleges and universities, and the Maryland Rehabilitation Association; and,
- Update the Plan on an annual basis, as needed.

#### Colleges/Universities in Maryland with Rehabilitation Counseling Programs:

Institution	Location	Programs
Coppin state University (Historically Black Institution)	Baltimore, Maryland	<ul style="list-style-type: none"> <li>• Undergraduate degree in Rehabilitation Counseling;</li> <li>• Master's degree in Rehabilitation Counseling;</li> <li>• Certificate Program in Assistive Technology; Vocational Assessment, and Job Placement and Development</li> <li>• Post-Master Certificate Program in Professional Counselor Licensure.</li> </ul>
The George Washington University	Washington, DC	<ul style="list-style-type: none"> <li>• Master's degree in Rehabilitation Counseling (online and on-site);</li> </ul>

Institution	Location	Programs
		<ul style="list-style-type: none"> <li>• Certificate program in Job Development/Placement;</li> </ul>
Towson University	Towson, MD	<ul style="list-style-type: none"> <li>• Bachelor's degree in Deaf Studies</li> </ul>
The University of the District of Columbia	Washington, DC	<ul style="list-style-type: none"> <li>• Master's degree in Rehabilitation Counseling</li> </ul>
University of Maryland Eastern Shore	Princess Anne, Maryland	<ul style="list-style-type: none"> <li>• Undergraduate degree in Rehabilitation Counseling;</li> <li>• Master's degree in Rehabilitation Counseling</li> </ul>

The plan may include the following:

- Active membership on advisory boards of colleges/universities with programs in Rehabilitation Counseling;
- Provision of job shadowing opportunities for Masters level students in their first year;
- Provision of internship opportunities in the comprehensive rehabilitation facility and field offices;
- Staff presentations to students and classes about the public rehabilitation program;
- Collaboration with the Maryland Rehabilitation Association training committee to provide on-going in-service training opportunities to current and prospective staff;
- Maintain effective partnership with historically black institutions to assure sufficient number of applicants for state agency job vacancies, so the workforce reflects the composition of the state; and
- To support retention of staff and succession planning, collaborate with university, professional association and the National Rehabilitation Leadership Institute partners to provide on-going mentoring and leadership activities.

(3) *Personnel Standards.* Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

(A) standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

(B) the establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

DORS has policies and procedures in place related to personnel standards to ensure that designated state unit professional and paraprofessional personnel are adequately trained and prepared, including:

- Standards for hiring VR specialists/rehabilitation counselors are consistent with standards in Maryland law, Labor and Employment Article which specify that rehabilitation

counselors “have a Bachelor’s degree from an accredited institution in rehabilitation counseling, human services, psychology, or a related field with at least one year of work experience in a human services occupation.” §9-6A-09. DORS considers related fields to include rehabilitation – career assessment, rehabilitation – employer services, education, deaf education, social work, psychology, human services, blind and vision services, employment/career counseling, and community counseling.

- Specific time period by which all state unit personnel will meet the Comprehensive System of Personnel Development standard: For 2014, 100 percent of DORS VR specialists/rehabilitation counselors met the Comprehensive System of Personnel Development standard of a Bachelor’s degree and a year of experience. No one is hired for such positions with less than a Bachelor’s degree.
- Standards for achievement of journeyman counselor status include a Master’s degree. DORS requires that VR specialists considered for promotion to rehabilitation technical specialist (the highest level of rehabilitation counseling) have a Master’s degree in rehabilitation counseling or a closely related field, which may include rehabilitation – career assessment, rehabilitation – employer services, education, deaf education, social work, psychology, human services, blind and vision services, employment/career counseling, and community counseling. DORS provides technical assistance in career development for staff, facilitates staff application for Rehabilitation Services Administration scholarships, and provides tuition reimbursement to support staff in achieving required credentials. These education and experience requirements ensure that personnel have current understanding of the labor force and the needs of individuals with disabilities.
- DORS encourages and supports achievement of Certified Rehabilitation Counselor certification through reimbursement of initial certification fees but does not require it.
- Paraprofessional personnel must meet standards of their specific position in the classified service according to position descriptions developed and updated by the MSDE Personnel Office and the Maryland Department of Personnel.

(4) *Staff Development*. Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

(A) a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

The Division maintains a system of staff development for staff professionals and paraprofessionals that includes the identification of training needs, developing policies and procedures, and conducting training activities.

Training needs are identified based upon results of a variety of assessment instruments and methods which include: (1) the organizational Planning Process in which training areas are determined by the initiatives identified in the Division’s five year Strategic Plan, the Annual Program Plan, and the Maryland WIOA State Plan; (2) DORS Performance Appraisal, which allows each professional employee and the employee’s supervisor to identify on a semi-annual basis the training needs and to develop a plan to assist the employee to meet the essential

functions of their position as reflected in their position description. These needs are shared with the Staff Development Specialist and training needs are prioritized, developed, implemented, and/or coordinated based on the results of the information; (3) Program Evaluation: Areas of need are identified by the DORS program evaluator, through the case review process and the RSA 107 review; (4) The triennial comprehensive assessment of the needs of individuals with disabilities; (5) Division's Policy Review Committee, the state Rehabilitation Council (SRC), and annual public meetings provide feedback and a continuous evaluation component identifying needs which can be addressed and/or alleviated by training which are submitted to the Staff Development Office for appropriate action; (6) Individual Staff Training Needs Survey: A training needs assessment questionnaire is distributed to all staff annually. The results are tabulated and categorized to prepare for individual and/or group training programs.

Policies and Procedures for staff development activities are maintained in the Division's Rehabilitation Services Manual I, Administrative Manual, section 700, as well as the Staff Development Site on InDORS, the Division's intranet which allows staff to access information on policies and procedures for in-service training opportunities, tuition reimbursement, reimbursement for fees related to achievement and maintenance of CRC credentials, mentoring and leadership activities, and provides a training calendar with links to brochures and registration information.

### *Training Activities*

The Staff Development program identifies training needs from surveys and sources noted above, and it develops and provides training to professional and paraprofessional staff through quarterly, annual, and customized training activities, which include the following:

- Orientation and training on fundamental rehabilitation process and procedures is provided to all new staff through Getting Connected, the Supervisor's Guide to training new staff through the Divisions, and the Quality Rehabilitation Training program provided to all new staff.
- Training for special populations is provided including: blindness and vision services, deaf and hard of hearing services, services for individuals with acquired brain injury, individuals on the autism spectrum, transitioning youth, and psychiatric rehabilitation throughout the year.
- Training in career assessment services is offered semi-annually.
- Rehabilitation technology training is offered throughout the year on a variety of Assistive Technology and worksite accommodation issues. When possible, these Assistive Technology trainings are coordinated with the MD Technology Assistance program.
- Statewide prescriptive training on a variety of topics is delivered to all counselors, including career counseling, employer services, ethics, job placement, case note/case documentation training, Americans with Disabilities Act training, and autism spectrum disorders.
- Staff participate in the annual statewide training conference sponsored by the DORS and the Maryland Rehabilitation Association.
- New supervisors training and ongoing training activities for supervisors and Division administrators are provided during semi-annual statewide supervisors meetings. Staff managers participate in management and leadership training through vendors.
- Training is provided on topics specific to the implementation of WIOA, such as Pre-

- Employment Transition Services and Sub-Minimum Wage requirements.
- Paraprofessionals participate in statewide prescriptive training throughout the year with their units as well as an annual training activity customized to meet the needs of staff and to address agency priorities.

The Staff Development office maintains a database of all training activities attended by Division professional and paraprofessional staff, organized by data fields of individual staff member, unit, and Office.

**(B) procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.**

The Division ensures that professional and paraprofessional staff receive significant knowledge from research and other sources by keeping abreast of the latest information on disability issues, legislation, and current topics and training on rehabilitation. Information, including WIOA implementation policy and procedures, will continue to be disseminated to staff in a variety of ways including the following:

- Posting information to staff on the Division's InDORS intranet and public website: [www.dors.maryland.gov](http://www.dors.maryland.gov);
- Disseminating email and agency program directives, administrative instructions, and information bulletins;
- Developing agency policy and procedures based on federal and state law and regulation, as needed;
- Revising agency policy and procedures manuals, as needed;
- Providing staff training on new policy and policy and procedural updates;
- Providing staff training, by DORS and WIOA partners, on a variety of current topics;
- Attending meetings, conferences, and workshops, including the three Maryland WIOA Convenings, Maryland WIOA Alignment Committee meeting, and WIOA partner training; and
- Posting training resources and archive presentations on the DORS website and intranet.

**(5) Personnel to Address Individual Communication Needs.** Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

*Meeting the needs of individuals who are deaf, hard of hearing or deaf/blind*

DORS has personnel skilled in American Sign Language (ASL) (ASL) who are assigned to provide services to consumers who are deaf and hard of hearing and deaf/blind who require such communication. DORS has TTYs in offices and has installed video phones within the office locations of the rehabilitation counselors for the deaf (RCDs). DORS hires approved interpreters, as needed, to assure that consumers have access to the full range of rehabilitation services they may need. DORS supports attendance of consumers at institutions specializing in services for the deaf, as appropriate.

*Meeting the needs of individuals who are blind or vision impaired*

DORS has a dedicated office, the Office for Blindness and Vision Services, which has counselors who have specialized caseloads working with individuals who are blind, visually impaired, or deaf blind. These staff participate in at least quarterly training on topics specific to blindness and vision services, Assistive Technology, job development, career counseling, and participate in other Division sponsored training with all staff. DORS collaborates with its partners in the provision of training including the National Federation of the Blind (NFB), the American Foundation for the Blind (AFB), Association for Education and Rehabilitation of the Blind and Visually Impaired (AER), and Helen Keller National Center (HKNC). DORS provides Assistive Technology, as appropriate and required, for individuals who are blind or vision impaired. DORS provides all information for consumers in the requested alternate format of the individual. DORS' website and intranet are fully accessible to users of screen readers.

#### *Meeting the needs of LEP individuals*

DORS provides interpreter and translation services to consumers through the state contract for such services and through staff with skills in languages other than English. A DORS workgroup addresses a multicultural initiative, which includes identification of staff with language skills in addition to English, enhancing cultural competencies of staff, identification of community resources, and provision of public information and agency forms in alternate languages. The Division includes periodic in-service training opportunities on cultural proficiency.

(6) *Coordination of Personnel Development Under the Individuals with Disabilities Education Act.* As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

The Division has personnel who have specialized caseloads serving transitioning youth. These staff participate in quarterly training activities on current transition topics. Staff are also encouraged to participate in ongoing professional development through participation in a variety of workshops, conferences, and in service training opportunities that are disseminated via email to all staff and posted on the Division's InDORS intranet. The Division also co-sponsors and coordinates an annual transition conference that is attended by over 500 staff, education partners, stakeholders, parents, and consumers. Staff are also encouraged to participate on WIOA partner trainings and in other activities. Examples of cross-training with secondary school personnel include the following:

- Training in evidence-based transition practices for Local Education Agency staff and DORS staff provided by TransCen, Inc., as part of the Maryland Seamless Transition Collaborative;
- Training on Autism Spectrum disorders provided by DORS in partnership with Pathfinders for Autism and the Maryland Rehabilitation Association; the Workforce and Technology Center supervisor of Autism Services is a certified Autism Specialist and has provided training to Workforce and Technology Center staff, to offices with the Office of Field Services, and at the Maryland Rehabilitation Association/DORS Annual Training Conference; and
- Training and presentations on blindness and vision services with the Local Education Agency, itinerate teachers, and DORS staff are held on a regular basis.

**(j) Statewide Assessment.**

**(1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:**

**Maryland DORS and  
Maryland State Rehabilitation Council**

*Executive Summary*

The Maryland DORS and the Maryland State Rehabilitation Council (MSRC) continually assess the rehabilitation needs of Maryland citizens with disabilities, as part of its state and strategic planning process. DORS and the MSRC hold annual public meetings and the MSRC regularly provides input on Agency planning, policy development, and recommendations. The results of the consumer satisfaction surveys are also reviewed in order to provide insight into the rehabilitation needs of Maryland Citizens with disabilities.

This year the Division, in collaboration with the MSRC, undertook the triennial comprehensive needs assessment in compliance with the Code of Federal Regulations at 34 CFR (361.29). One member of the MSRC was an integral part of this 14-member Needs Assessment team which (1) collected and analyzed relevant existing data and (2) conducted and analyzed findings of supplemental surveys, focus groups held during the DORS public meetings, and key informant interviews, in order to ascertain the needs of individuals with disabilities throughout the state.

*Required Elements*

The results of the comprehensive statewide needs assessment include the following required elements:

1. The rehabilitation needs of individuals with disabilities residing within Maryland, particularly the VR needs of --
  - A. Individuals with most significant disabilities, including their need for supported employment services;
  - B. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;
  - C. Individuals with disabilities served through other components of the statewide workforce investment system;
  - D. Youth with disabilities, and students with disabilities, including
    - 1) Their need for pre-employment transition services or other training services and
    - 2) An assessment of the needs of individuals with disabilities for transition services and pre-employment transition services, and the extent to which such services are coordinated with local education agencies; and
2. An assessment of the need to establish, develop, or improve community rehabilitation programs within the state.

*Recommendations from the Focus Areas of the Needs Assessment Addressing the Required Elements.*

1. **Develop a strategic plan for fulfilling WIOA requirements**, in collaboration with workforce and educational partners.
2. **Evaluate staffing needs within DORS**, including a detailed analysis of required work functions, who will perform these functions, and how work performance will be

evaluated, and considering how to increase the number of DORS staff able to communicate using American Sign Language (ASL) (ASL), such as by including “ASL-preferred” on all announcement for direct-hire positions.

3. **Provide opportunities for mutual training and collaboration between DORS and other workforce programs**, especially the AJCs, TANF, and community colleges, to strengthen the network of partners at the local level and increase staff knowledge about services offered by these programs.
4. **Increase the agency’s capacity to fully utilize the 15 percent reserve fund for pre-employment transition services (Pre-ETS) Statewide** by sufficiently aligning staff resources according to need, encouraging more Community Rehabilitation Programs (CRPs) to offer Pre-ETS as a fee-for-service, implementing updated MOUs with each of the local education agencies, developing WTC summer programs for deaf and hard of hearing, and considering how to use remaining reserve funds for authorized activities.
5. **Improve customer service and maximize staff time by utilizing technology** (e.g. Smartphone applications, electronic signatures, etc.) to expedite communication between DORS and consumers, community rehabilitation programs, and other workforce programs.
6. **Develop a system for consumers to provide feedback on their satisfaction with services at key points during the rehabilitation process**, establishing formal procedures for tracking consumer complaints in order to identify staff training needs.
7. **Improve information and referral services to AJCs and other workforce partners for individuals on the DORS waiting list**, especially Social Security Ticket to Work holders who may benefit from Work Incentive Planning and Assistance (WIPA) programs and Employment Network services, while waiting for DORS services to be available.
8. **Improve the variety of employment opportunities available to DORS consumers** by increasing staff knowledge of current labor market trends; by collaborating with community colleges to develop pre-apprenticeships and RA programs for high growth industries in Maryland in collaboration with workforce and educational partners; by providing customized employment services; and by increasing opportunities for DORS consumers to participate in internships.
9. **Create a catalogue of standard letters in the same foreign languages for which the DORS Application is already available** to ensure individual understanding of services and their rights and responsibilities, during the rehabilitation process.
10. **Increase technology training opportunities for DORS consumers** to include advanced training on Apple software/devices and access technology used in competitive integrated employment.
11. **Expand and increase, as appropriate, the programs and services designed specifically for individuals who are deaf and hard of hearing, including students in need of Pre-ETS**, by evaluating the Rehabilitation Communication Services pilot to determine whether services and outcomes have improved, establishing an in-state Pre-ETS program to complement existing out-of-state programs, and providing consultation services for other WIOA workforce programs on using technology to communicate with deaf individuals.
12. **Promote comprehensive rehabilitation services for Deaf-Blind individuals by reconvening a Deaf-Blind workgroup** to collaborate closely with grassroots

organizations, community partners, advocacy groups, and the Helen Keller National Center, ensuring that Deaf-Blindness remains a priority for the agency.

#### *Impact of Federal Funding and State Government Personnel Actions on Staff Capacity.*

As emphasized in the previous three Needs Assessments, the DORS waiting list and delays in service provision remain a prominent concern and constitute the most prominent barrier to VR services for individuals with significant disabilities in Maryland. As of the completion of this Needs Assessment, over 3,500 eligible individuals with significant disabilities are placed on a waiting list for VR services lasting up to 28 months. Clearly, individuals on the waiting list are the most seriously unserved of populations. Several factors currently prevent DORS from moving people from the waiting list.

##### *Sequestration*

Since sequestration began, Maryland DORS has been fairly flat funded in its base level funding. Congress has passed the FY 17 VR appropriations bill, and the high level funding for VR continues to be basically flat when compared to FY 16. On top of that, Congress has applied a 6.9 percent sequestration cut. Maryland DORS estimates a \$2.8 million dollar loss in funding as a result. While DORS has received a re-allotment of funds over the years that helped negate the lack of growth in base funding, an agency cannot rely on that funding as it is unpredictable from one year to the next.

##### *Pre-employment Transition Services 15 percent Reserve Fund Requirement*

The Rehabilitation Act of 1973, as amended by the WIOA, requires VR agencies to reserve not less than 15 percent of the federal VR allotment to provide, or arrange for the provision of, pre-employment transition services (Pre-ETS) for students with disabilities transitioning from school to postsecondary education programs and employment in competitive integrated settings. This requirement to reserve 15 percent of the state grant also applies to re-allotted funds, and leaves only 85 percent of the annual budget remaining for services to adults. These factors have and will continue to contribute to the waiting list. During FY15, DORS received approval to hire six additional contractual positions from the state. However, since these new staff will be 100 percent devoted to provision of Pre-ETS, their performance is not expected to result in a decrease in the agency's waiting list for VR services.

##### *Federal Requirement to Invest in the State workforce system Infrastructure with VR Grant Funds*

The Rehabilitation Act of 1973, as amended by the WIOA, requires VR agencies to begin setting aside a percentage of the VR Grant to support entities within the state administering WIOA programs. This percentage will increase by .25 percent over four years, capping at 1.5 percent of the VR Grant per year. Based on FY 16 funding levels, DORS estimates this set aside requirement to equal up to \$1.8 million over the next four years.

##### *State Government Personnel Actions*

From 2006-2016 the VR program has seen a 19 percent reduction in its permanent workforce due to statewide budget constraints and the state's desire to reduce the overall size of the state's workforce. In addition, staff vacancies are affecting VR specialists/counselors, as well as most

other agency staff, and continue to be another significant factor in the agency's ability to shorten the waiting list and provide services to individuals with significant disabilities on a more timely basis. The state government hiring freeze, which intensified during the recession, has continued to result in extended periods of vacancies after staff leave the agency. During federal FY 15, DORS field offices experienced 23 vacancies, which is equivalent to approximately 18 percent of the VR counseling positions. In light of the new responsibilities placed on DORS with the implementation of WIOA, DORS may again need to request an exemption to the state hiring freeze for VR specialist positions.

#### *Use of DORS Public Meetings for CSNA Information Gathering*

Throughout this 2016 CSNA report, the DORS public meeting is frequently mentioned as a methodology used during the assessment period. These meetings were held on six dates in July and August in Annapolis (ten attendees), Baltimore (17 attendees), Easton (14 attendees), Westminster (seven attendees), and Wheaton (38 attendees), and remotely via teleconference (12 attendees). Other than in Westminster, where only DORS staff were present, each of the other meetings enjoyed a variety of attendees, including DORS staff, Community Rehabilitation Program (CRP) staff, consumers, advocates, and others. During the agenda for each of these meetings, CSNA focus groups were convened. Each focus group had a facilitator and two individuals to take notes, and the facilitator explained the purpose of the CSNA and reviewed confidentiality requirements.

Participants were given the opportunity to provide feedback on the major topic areas of the CSNA, including:

1. The rehabilitation needs and barriers encountered by the following groups of individuals with disabilities:
  - a. Those with most significant disabilities, including their need for supported employment;
  - b. Those from minority populations, the unserved, and the underserved; and
  - c. Those served by other workforce programs;
2. The need for transition services, including pre-employment transition services, among students with disabilities, and how VR and the LEA's can partner together in the provision of these services; and
3. The need to establish, develop, and/or improve Community Rehabilitation Programs.

#### *DORS Regions*

Following the 2013 CSNA, DORS reorganized the regions within the Office of Field Services (OFS) during federal FY14. The Regions and counties served by each are identified below:

- Region 1: Serving Allegany, Carroll, Frederick, Garrett and Washington Counties;
- Region 2: Serving Anne Arundel, Calvert, Caroline, Charles, Dorchester, Queen Anne's, St. Mary's, Somerset, Talbot, Wicomico and Worcester Counties;
- Region 3: Serving Baltimore City and Eastern Baltimore County;
- Region 5: Serving Baltimore, Cecil, Harford, Howard and Kent Counties; and
- Region 6: Serving Montgomery and Prince George's Counties.

The Office of Blindness and Vision Services (OBVS) operates from three Regional offices. The office locations and counties served by each are identified below:

- Cumberland: Serving Allegany, Carroll, Frederick, Garrett, Montgomery and Washington Counties;
- Baltimore: Serving Baltimore City and Baltimore, Howard and Harford Counties; and
- Annapolis: Serving Anne Arundel, Calvert, Caroline, Cecil, Charles, Dorchester, Kent, Prince George's, Queen Anne's, St. Mary's, Somerset, Talbot, Wicomico and Worcester Counties.

(A) with the most significant disabilities, including their need for supported employment services;

*The Need of Individuals with Most Significant Disabilities for Supported Employment Services in Maryland*

An increased need for supported employment services, including extended services for youth with most significant disabilities for a period not to exceed four years, is anticipated for several reasons:

- Section 511 of WIOA states that the DSU must provide youth with disabilities documentation that the youth have completed certain activities, such as receipt of transition services and Pre-Employment Transition services, under the VR program prior to the youth engaging in subminimum wage employment.
- In Maryland Senate Bill 417/House Bill 420: Individuals With Disabilities: Minimum Wage and Community Integration (Ken Capone Equal Employment Act) was passed during the 2016 Maryland Legislative Session. The bill phases out the authority for the Commissioner of Labor and Industry to authorize a work activities center or other sheltered workshop to pay a subminimum wage to an employee with a disability. It also restricts the authority of a work activities center or other sheltered workshop to pay a subminimum wage and/or a sub-prevailing wage to an employee with a disability. Beginning October 1, 2020, the Developmental Disabilities Administration (DDA) may not fund providers that pay individuals less than the minimum wage under a specified federal certificate.

Other considerations:

- According to MSDE data described later in this report, over 1,000 students with Intellectual Developmental Disabilities or Autism are expected to exit school each year for the next several years. While not all of these students are expected to require supported employment, many of those who would benefit from these services will exit prior to age 21 and will be subject to the Developmental Disabilities Administration (DDA) Waiting List.
- The Maryland Developmental Disabilities Coalition FY16 DDA Budget Fact Sheet reports that the DDA Waiting List has increased nearly four percent from 7,700 to over 8,000 children and adults.

*Methodology: DORS data review.*

DORS data was reviewed to assess the number of initial Individualized Plans for Employment (IPEs), identified as Supported Employment plans, developed during FY 13 through FY 15.

#### *Discussion*

- **Number of Supported Employment Plans Developed Each Year:**
  - In FY13, of 5,178 plans initiated, **1,556** (30 percent) were supported employment plans. Out of 1,556 supported employment plans, **455** (29 percent) were developed for youth with disabilities age 24 and younger.
  - In FY14, of 5,274 plans initiated, **1,626** (31 percent) were supported employment plans. Out of 1,626 supported employment plans, **419** (26 percent) were developed for youth with disabilities age 24 and younger.
  - FY 2015, of 5,276 plans initiated, **1,501** (28 percent) were supported employment plans. Out of 1,501 supported employment plans, **340** (23 percent) were developed for youth with disabilities age 24 and younger.
- **Specific Populations Provided Supported Employment Services each year:**
  - The numbers of EBPSE individuals served rose 51 percent from **1,841** in FY13 to **2,783** in FY15.
  - The number of GTYI students served decreased 12 percent from **1,199** in FY 13 to **1,046** in FY 15, during which DORS ceased to use the Governor's Transition Youth Initiative Fund with the Youth Supported Employment Fund when preparing authorizations for services.

#### *Needs/Concerns Identified*

- The overall number of initial plans developed during the year, which included supported employment services, decreased three percent from 1,556 in FY13 to 1,501 in FY15. This is largely due to the six percent decrease in initial plans, which included supported employment, developed for youth with disabilities age 24 or less at application during this same period, when initial plans were more frequently being prepared for students in high school before long-term funding for supported employment could be verified.
- During this same period, the percentage of initial plans developed for individuals referred by community rehabilitation programs and including supported employment services increased from 77 percent in FY13 to 84 percent in FY15. This is largely due to the strong collaboration between DORS and BHA to ensure that both DORS staff and CRPs are working effectively to maximize the braided funding mechanism.
- With the potential influx of over 3,000 sub-minimum wage earners applying for VR services during the next three years and the requirement to be able to evaluate their potential for competitive integrated employment, DORS may need to establish a waiting list for individuals assigned to Order of Selection Category I: Most Significantly Disabled.

#### *Recommendations*

- Examine DORS policy regarding supported employment in light of WIOA requirements regarding Section 511 and provisions for customized employment and extended services.
- Develop a strategy for increasing the number of students with disabilities exiting high school to whom extended services can be made available.

- Update the DORS and DDA MOU considering whether a braided funding mechanism similar to the DORS and BHA model can be utilized.
- Partner with DDA, BHA, and 14c certificate holders to plan for implementation of Section 511 requirements.

*Individuals who are Blind/Visually Impaired and Deaf-Blind*

As reported in the 2013 State Plan Needs Assessment, the Maryland DORS and the Office for Blindness and Vision Services (OBVS) are committed to providing quality and specialized services to Maryland citizens who are Blind, Visually Impaired, and Deaf-Blind. Together, the Office for Blindness and Vision Services and the state Rehabilitation Council, Blind Services Committee Provides oversight and leadership in guiding policies and enhancing services to Maryland citizens. The Office for Blindness and Vision Services (OBVS) operates the following programs and services for eligible participants:

- i. VR Counselors are located throughout the state in DORS field offices and at the Workforce and Technology Center. The staff provides employment and independent living services for individuals who have a goal of employment.
- ii. Rehabilitation Teachers for the Blind are also located throughout the state in DORS field offices and at the Workforce and Technology Center. The staff provides independent living assessments and services to individuals who have a goal of employment. Additionally, these Rehabilitation Teachers provide in-home teaching for the Independent Living Older Blind Grant (ILOB). They assess for areas such as: mobility training, household management skills, and communication device training.
- iii. OBVS has, on staff, a Deaf-Blind Specialist whose role is to provide technical assistance and support to all staff on issues pertaining to Deaf-Blindness. Another major component of this role is to communicate with the Deaf-Blind Community, expand program development, and manage the agencies VR SSP program.
- iv. The Maryland Business Enterprise Program for the Blind (MDBEP) is also operated through the Office for Blindness and Vision services and provides opportunities for individuals who are legally blind to operate vending, gift shops, or other food service facilities in federal and other property.
- v. Services for the Blind and Visually Impaired (SBVI) is a center-based program for individuals who are Blind and Visually Impaired and is located at the Workforce and Technology Center (WTC). SBVI addresses areas of independent living, mobility, technology, and communication training in a residential setting. The program also has a support group for individuals in need of this service.

*Prevalence (Blind/Visually Impaired)*

According to the 2014 American Community Surveys, there are 59,439 individuals in the state of Maryland with vision loss who are between the ages of 18 and 64. During the past three years, DORS served 1,159 individuals for whom blindness was reported to be their primary impairment, and 180 of these were youth in transition when applying for services.

*Methodology: Blindness Services Survey*

A survey regarding blindness services was emailed to stakeholders, consumers, community partners, caregivers, and DORS staff to solicit feedback regarding the unmet needs of individuals

who are blind or visually impaired. DORS received 39 completed surveys via email, and the responses are as follow:

#### *Needs/Concerns Identified*

- The need to improve job placement methods to ensure individuals, especially those who complete trainings and internships, receive continuous assistance and have access to job leads through various mediums.
- The need for more comprehensive and intensive blindness skills training to help consumers become proficient in independent living/daily living skills as a necessary precursor for a successful employment outcome.
- Concerns related to technology, especially the lack of advanced technology/computer training being offered to consumers.
- Concerns regarding employers', including Society of Human Resource Management (SHRM), lack of knowledge regarding blindness and workplace accommodations
- Concerns regarding transportation for consumers in rural areas.

#### *Recommendations*

- Hiring additional DORS staff with specific knowledge of blindness and visual impairments (including Staff Specialists, Orientation and Mobility Specialists, Rehabilitation Teachers, Employment Specialists, Rehabilitation Technology Specialists, and VR Counselors) to ensure more personalized services, increased counseling services, and driven with a customer service approach that is fully embraced and actualized.
- Enhance and emphasize counselor role in (1) Advising consumers about the full scope of services, the rehabilitation team, and process, including expediting services to those in job jeopardy to ensure the consumer has the opportunity to gain knowledge and skills necessary to maintain current employment; (2) focusing on capabilities and individualized needs and learning styles; (3) facilitating access to Assistive Technology; and (4) minimizing gaps in the provision of services and (5) Increasing timeliness of the services provided.
- Explore home based employment and/or self-employment opportunities for the addressed population.
- Provide updated technology trainings to DORS consumers including more advanced trainings on Apple software/devices and access technology used in competitive integrated employment.
- Explore possible solutions to issues related to limited transportation in order to assist those in more rural areas have full access to DORS services.

#### *Prevalence (Deaf-Blind Community)*

There is little data available on individuals experiencing a significant level of both vision and hearing loss in Maryland, but the number does appear to be relatively low. The 2014 National Child Count of Children and Youth who are Deaf-Blind, administrated by the National Center on Deaf-Blindness, identified 178 children or youth with significant levels of dual sensory loss in Maryland. Over the past three years DORS has provided VR services for 113 individuals who are Deaf-Blind, and 20 of these were transition age youth.

### *Methodology: Deaf-Blind Services Survey*

A survey regarding Deaf-Blind (DB) services was emailed to stakeholders, consumers, community partners, caregivers, and DORS staff to solicit feedback regarding the unmet needs of individuals who are deaf-blind. 41 returned surveys were received via email.

### *Methodology: DORS Public Meetings*

During the meeting which took place in Wheaton, Maryland, 15 Deaf-Blind community members attended to express their concerns regarding DORS services and other related community services. As in the previous Needs Assessment survey, there were universal themes of transportation, communication, and support services as major unmet needs of individuals who are Deaf-Blind. The concerns expressed are summarized below:

#### *Needs/Concerns Identified*

- Lack of skilled professionals and customized services to address the employment and independent living needs of the Deaf-Blind Population. Services that are currently lacking include a comprehensive community-based statewide Support Service Program (SSP), adjustment to blindness services, psychological services, and employment services
- Lack of counselors within OBVS that understand the complexities of Deafness. DORS should be providing services through direct communication and not through interpreters.
- Few employers are willing to hire Deaf-Blind consumers due to fear of liability issues, lower work production, and uncertainty of complex accommodations.
- Lack of technology resources including skilled technologists to train on devices and funding to repair expensive devices, such as braille displays and other equipment.

#### *Recommendations*

- Increase flexibility and consider supporting and funding “unconventional” VR services that may be exclusive to this disability, in light of their unique needs and complexities. Unconventional VR services could include: hiring Deaf-Blind mentors to work with consumers to increase advocacy skills and decrease isolation, offering Pro-Tactile and Tactile ASL trainings to ensure effective communication for consumers and decrease misunderstandings, and incorporating Support Service Providers (SSPs) as job coaches.
- Enhance career services for Deaf-Blind individuals. Employ the assistance of experts to assist with navigating the complexities associated with job development and placement. This includes services such as SSPs, Orientation and Mobility, Rehabilitation Teaching, and Assistive Technology.
- Expand staff and advocate for community resources to provide a full range of independent living and employment services to Deaf-Blind, including older Deaf-Blind, within DORS and community programs/providers (qualified interpreters, technologists, teachers, counselors, therapists, psychologists, psychiatrists, and other professionals).
- Explore means of increasing access to transportation; limitations are primarily due to the communication barriers.
- Reconvene a Deaf-Blind workgroup to collaborate closely with grassroots organizations, community partners, advocacy groups, and the Helen Keller National Center, ensuring that Deaf-Blindness remains a priority for the agency.

## *Individuals who are Deaf, Hard of Hearing and Late Deafened*

### *Prevalence*

Per the U.S. Census Bureau 2014 American Community Survey 1-Year Estimates, over 158,000 Maryland citizens report having a hearing disability. 35 percent (55,855) of these individuals are ages 18 to 64, and nearly another five percent are under age 18. Individuals who are deaf and/or hard of hearing constitute 2,423 of the consumers served by DORS between FY 13 and FY 15 (approximately six percent of the total served), and 702 of these were transition youth at the time of application.

### *Methodology - Deaf and Hard-of-Hearing (DHOH) Open Online Survey*

An online survey for the Deaf and Hard-of-Hearing (DHOH) community was used to evaluate how effectively DORS meets the needs of DHOH individuals. This survey was sent directly to consumers, DORS staff, CRPs, members of the grassroots community, interpreters, and was also made publicly available on the DORS website during the three weeks that it was available. The link to the survey is shareable, and 95 individuals provided responses to the survey questions.

### *Survey Responses*

When asked about their satisfaction with services, respondents gave the following scores:

- Speed of service: 55 percent;
- Quality of service: 58 percent;
- Confidence in services: 58 percent;
- Accessibility of services: 75 percent;
- Cost of services: 63 percent;
- “Deaf-Friendliness:” 63 percent; and
- Effectiveness in currently meeting the needs of DHOH job-seekers in Maryland: 76 percent.

### *Needs/Concerns Identified*

Respondents identified the following needs/concerns:

- Length of waiting list to access services and lack of results;
- Insufficient number of rehabilitation counselors for the Deaf (RCDs);
- Communication (including interpreters) and lack of job coaches;
- Lack of awareness of accommodations needed for Deaf employees;
- Lack of accessibility to accommodations needed for Deaf employees;
- Discrimination;
- Lack of English skills;
- Lack of Driver’s License; and
- Issues with SSI/SSDI.

In addition, respondents spoke of perceived barriers to accessing DORS services, including unresponsiveness on the part of the counselors, and spoke of the need to reduce the waiting list, to have more counselors to respond to inquiries, to increase availability of job coaching services,

to provide assistance with college and finding internships, and to provide more interpreting services.

### *Recommendations*

- Begin to include “ASL preferred” on all direct-service position to grow the number of signing staff at DORS.
- Provide adequate support to the RCDs to help with time management and prioritization.
- Invest in Deaf services within the agency and at CRPs:
  - Because DHOH resources are limited in Maryland, the agency needs to explore, at the national level, programs which are helping consumers to better prepare for self-advocacy, personal growth, internships, and jobs.
  - Deaf Self Advocacy Training (DSAT) train-the-trainer classes are needed for DORS RCDs, as well as for Rehabilitation Communication Specialists, and Maryland School for the Deaf staff, so consumers have additional opportunities to learn self advocacy skills.
- WTC also needs to expand services and trainings that are easily accessible to deaf and hard of hearing consumers.

### *Methodology: Key Informant Interview*

The agency’s Staff Specialist for Deaf and Hard of Hearing (DHOH) Services was provided an opportunity to review the needs, concerns, and recommendations regarding Deaf and Hard of Hearing services in the 2013 CSNA and was then asked to comment on current services and share any recommendations for future improvement.

### *Needs/Concerns Identified*

- **Order of Selection:**  
In 2013, there were a large number of DHOH individuals who fell under Category II of the DORS Order of Selection who are placed on the waiting list and who are in need of assistance for job retention. In 2016, this is still true. DORS RCDs need to be encouraged to fully utilize a recently introduced Functional Capacities Assessment form to more clearly define an applicant’s eligibility status and order of selection.
- **Transitioning Youth:**  
In 2013, the CSNA reported that transitioning students need to have more opportunities for basic work experiences and exposure to role models to develop an understanding of employer expectations and to develop a strong work ethic, rather than be satisfied with remaining on government assistance. In 2016, this is still true and even more so because of the requirement to make pre-employment transition services available for students with disabilities. There are very few community rehabilitation programs that offer opportunities for youth who are deaf to participate in a work-based learning environment. Gallaudet University (GU) and National Technical Institute for the Deaf (NTID) continue to offer Science, Technology, Engineering, and Math (STEM) summer camps and other summer learning programs on campus. DORS is committed to serving consumers that participate in these camps and summer learning programs, but the associated out-of-state

costs are high. There is a need for these types of programs to be offered in-state to provide increased access for all deaf students.

- **AJCs:**

In 2013, AJCs, then known as AJC centers, were not adequately serving DHOH individuals, due primarily to a general lack of staff trained on how to communicate with these individuals. In 2016, these same issues are ongoing, as many AJCs are still referring applicants back to DORS, due to a lack of understanding as to how they can communicate with or work with an individual who is deaf.

- **Foreign-Born:**

In 2013, the CSNA found a significant increase in foreign born deaf consumers, who often had complex communication needs preventing their successful involvement in services such as Adult Basic Education/GED or training from other agencies. In 2016, Certified Deaf Interpreter (CDI) service utilization has resulted in some improvements in Adult Basic Education (ABE) through the assistance of the Office of Deaf and Hard of Hearing (ODHH). ODHH is currently working with the DLLR to update their policies regarding working with foreign populations. ODHH still refers most deaf individuals to DORS for employment-related services.

- **Veterans:**

In 2013, veterans returning from service with hearing loss often received limited assistance from other agencies and faced great difficulty adjusting to their disability. Today, Veteran Affairs works with family and veterans who have hearing loss to assist with coping and communication. Technical assistance is provided at Bethesda Hospital where professionals have received training to learn more about "hidden" disability loss.

- **Cost of Interpreter Services:**

In 2013, the CSNA reported that many employers seemed reluctant to hire deaf and hard of hearing individuals due to concerns over paying for interpreting services or other accommodations. Today, businesses are still reluctant to pay for interpreter services due to a lack of knowledge regarding the use of tax credits. However, Video Remote Interpretation (VRI) training has become more popular and provides a short-term resolution for improved communication in the workplace.

### *Recommendations*

- DORS RCDs and WTC Deaf Unit staff need updated career counseling training regarding current job trends to explore with their consumers the most viable post-secondary training options. There appears to be an increasing amount of employment opportunities in technology-related careers that require an Associate's Degree (AAS), such as: Mobile application development, 3d Graphics technology, Biomedical Technology Technician, and various Healthcare training programs.
- Collaborate with colleges, including Gallaudet U. and NTID, to better track employment outcomes of students who obtain two and four-year degrees.
- To help address staffing challenges experienced by CRPs and to improve the low success rate of deaf consumers served by CRPs, consider expanding the Rehabilitation Communication Specialists (RCS) pilot so that RCS' will have more opportunities to work with CRPs. The RCS 6-month pilot is currently underway in Region VI and the Elkton district office. Rehabilitation communication specialists work in partnership with a consumer's DORS counselor to provide individualized employment services ranging

from self-advocacy and job readiness to job development and job retention with consumers who are experiencing difficulties with communication that have created long-term unemployment or under-employment.

- Evaluate the RCS Pilot to determine the successful placement rate and to analyze its overall cost-effectiveness. According to anecdotal reports of counselors and RCS Monthly Progress Reports received thus far, the services provided by the RCSs are adding a much-needed valuable service that is empowering consumers to obtain solid jobs with a career path, not simply “soft money” jobs which often result in recurring referral to DORS.
- Since the State of Maryland has accepted a new contract with Visual On-Site Communication, the quality of interpreter services has improved, but there are still ongoing referral and/or scheduling issues for consumers in rural areas, such as the Eastern Shore and Western Maryland. Recommend addressing these issues.
- The AJC staff often do not know how to access deaf services due to a lack of related knowledge and skills. Identify DORS staff to provide consultation services to AJC staff on using VRI services to meet communication needs.
- Create a resource guide for staff working with special populations including foreign born deaf individuals, transitioning youth and people who are hard of hearing/late deafened.
- Design a Maryland DORS Pre-ETS program for DHOH students to complement existing programs, such as those currently offered by G.U. and NTID: Discover Your Future (DYF) and Explore Your Future (EYF). Perform a Cost-Benefit analysis to compare the value of providing these services in- vs. out-of-state.
- Offer students a Deaf Self-Advocacy Training course to increase their independence and enhance their ASL skills so that they may better communicate with employers and leaders.

*Individuals with Intellectual and Developmental Disability, including Section 511 Considerations*

WIOA Section 511 does not require a DSU to identify individuals who are currently earning sub-minimum wage. However, DORS has compelling reasons for developing a proactive approach for managing these referrals, including the sheer number of individuals in Maryland currently earning sub-minimum wage who could self-refer or be referred to the agency at any time to obtain the documentation required to continue earning sub-minimum wages, and the implications of Maryland SB 417/HB 420: Individuals With Disabilities: Minimum Wage and Community Integration (Ken Capone Equal Employment Act), signed into law on May 19, 2016 described in the background discussion for the Need of Individuals with Most Significant Disabilities for Supported Employment Services in Maryland on page nine of this report. Because the majority of 14c certificate holders are also programs funded by the Developmental Disabilities Administration, it is understood that the majority of individuals working for subminimum wage are individuals with intellectual and developmental disabilities. As such, this section of the Needs Assessment will focus on the use of 14c certificates in Maryland and the impact for VR in providing the services required by WIOA for individuals employed in these settings.

### *Prevalence*

Data available on the DLLR, Wage and Hour Division (WHD) was reviewed for Maryland. This data was current through March 2016. Information was compared to the DORS Fee Schedule to determine which geographic regions the providers primarily serve.

An analysis of the information available noted that 36 CRPs have 14c certificates permitting them to pay sub-minimum wages. All but two of the CRPs are currently providing services for Maryland VR. Of the 36 CRPs mentioned above, 3,469 Individuals are being paid through the use of sub minimum wage certificates. Five CRPs have more than 200 individuals involved in subminimum wage work. Of the top five, the highest is 387 and the lowest 214.

Over DORS five regions the Wage and Hour Division information translates as follows:

- Region 1: 479 Consumers (7 CRPs)
- Region 2: 1,406 Consumers (12 CRPs)
- Region 3: 258 Consumers (3 CRPs)
- Region 5: 606 Consumers (8 CRPs)
- Region 6: 720 Consumers (6 CRPs)

### *Needs/Concerns Identified*

- Significant impact to DORS capacity in specific geographic areas regarding the ability to provide required counseling/guidance to individuals engaged in sub-minimum wage employment.
- Need to establish how the work will be allocated within the regions. This will especially affect areas where counselors already have over 200 individuals on their caseloads.

### *Methodology: Public Meetings and DORS Survey*

Providers expressed significant concern regarding how to streamline the DORS referral process for individuals currently working below minimum wage. Other providers had questions about whether training would be provided on the new regulations for competitive, integrated employment as they are unclear about how it all fits together.

### *Needs/Concerns Identified*

- Need to establish liaisons with providers who have been issued 14c certificates, and to implement a protocol for initially obtaining specific information that identifies the individuals already working at subminimum wage who will need to be counseled.
- Need to create an on-going process for the annual counseling of individuals who choose to remain in sub-minimum wage employment.
- Need to continue to provide opportunities for the CRPs to participate in the training being provided to DORS counselors in regard to what constitutes competitive, integrated employment.

### *Recommendations*

- Review literature from Office of Disability Employment Policy and Vermont Conversion Institute and, in collaboration with CRPs, evaluate how to implement 511 WIOA requirements within the agency and each region.

- Establish a process for obtaining consumer information from CRPs with 14c certificates for individuals working at subminimum wage.
- Provide training opportunities to DORS staff and CRPs in the implementation of Section 511 especially around competitive integrated employment.

*Individuals with Severe and Persistent Mental Illness*

Information from the 2013 Comprehensive Needs Assessment noted that the utilization of mental health supported employment services varies by county. Additionally, a documented need was to examine longitudinal data to inform program development and staff and provider training.

*Prevalence*

Per a Behavioral Health Organization (BHO) Services Report provided by the Maryland Department of Health (DHMH) Behavioral Health Administration (BHA) for claims paid through June 2016, over 68,000 individuals in Maryland are being served by the BHA and, of those, 3,054 are receiving long-term funding for supported employment.

*Methodology: DHMH and DORS Data Comparison.*

A policy and braided funding mechanism with BHA assures that the individuals BHA report as receiving SEP services are individuals referred to DORS for the provision of job coaching for job development and intensive job coaching at the onset of employment. To assess whether supported employment services for individuals with Severe and Persistent Mental Illness are being appropriately integrated between DORS and BHA statewide according to this braided-funding policy, the BHO Services Report data on the number of individuals served by County paid through June 2016 was compared to DORS data on the number of individuals with a priority population diagnosis served under an Individualized Plan for Employment through June 2016.

The results of this comparison are provided in the table below. For each County, the table displays the total number receiving any Behavioral Health Administration (BHA) services, the total receiving BHA supported employment funding, the total receiving services from DORS under an IPE, and the total number of Community Rehabilitation Programs (CRPs) approved both by DORS and BHA to provide services in the County.

County	Total receiving any BHA service	Total receiving BHA supported employment funding	Total receiving services from DORS (in a Plan)	# DORS/BHA CRPs
Alleghany	1,695	25	43	2
Anne Arundel	4,959	202	245	4
Baltimore City	22,454	364	765	15
Baltimore County	9,795	215	365	7
Calvert	732	83	120	1
Caroline	495	16	15	2
Carroll	1,442	157	203	5
Cecil	1,608	28	69	1
Charles	1,326	141	110	1
Dorchester	771	28	22	1
Frederick	2,002	176	128	1
Garrett	340	19	12	2
Harford	2,733	62	95	4
Howard	1,753	202	126	3
Kent	279	14	13	1
Montgomery	5,470	741	430	4
Prince George's	5,970	169	369	3
Queen Anne	384	24	17	1
Somerset	396	11	18	0
St. Marys	1,158	181	140	2
Talbot	378	12	17	0
Washington	2,632	116	145	1
Wicomico	1,776	50	96	3
Worcester	794	18	24	0
<b>Total</b>	<b>68,062</b>	<b>3,054</b>	<b>3,587</b>	<b>33*</b>

\*Total number of DORS approved BHA CRPs. Some providers provide more than one service including: BHA SEP (12); EBPSE (13); and ACT (10).

DORS next evaluated whether each Region has a sufficient distribution of DORS counselors with technical specialties to serve consumers with severe and persistent mental illness and to function as liaisons with BHA-approved CRPs.

The table below displays for each DORS Region the distribution of consumers receiving BHA supported employment services, the number of DORS consumers with priority population diagnoses receiving services under DORS Individualized Plans for Employment, the number of BHA-approved CRPs, the number of DORS counselors with technical specialties to serve this population, and the average number of consumers per counselor.

DORS Region	# BHA SEP Consumers	# DORS Consumers in Plans	# BHA *CRP Locations	# DORS Technical Specialists	Average # of Consumers Per DORS Liaison
1	493	531	10	6	88
2	766	824	15	9	91
3	364	765	15	11	70
5	521	668	9	9	74
6	910	799	8	6	133
<b>Total</b>	<b>3,054**</b>	<b>3,587</b>		<b>41</b>	

\*There is an overlap of CRP locations within Regions, and one provider may provide services in more than one county within the same region and/or more than one region.

#### *Needs/Concerns Identified*

- A review of DORS information for individuals with a potential priority population diagnosis (e.g. Major Depression, Bi-Polar Disorder, or Schizophrenia) who were in an Individualized Plan for Employment (IPE) in SY2016 found that DORS is capturing a majority of the individuals reported to be receiving SEP through BHA.
- In Baltimore City it appears that DORS is working with about twice the number of individuals reported by BHA. This may be due to a number of factors: counselors, other than those with the behavioral health supported employment expertise, are working with those individuals and are not aware of supports available in the community, miscoding of primary diagnosis, or they may be carryover cases from previous years that have been closed/discharged from the BHA system.
- In Region 6, there appears to be a need for additional CRPs and additional counselors with a technical specialty to service this population.

#### *Recommendations*

- Information related to the psychiatric disability identified by DORS needs to be further researched for accuracy and source.
- Continue to monitor statewide and regional trends of individuals accessing Behavioral Health Supported Employment services through BHA and DORS.

- Provide training to DORS staff regarding behavioral health services, eligibility criteria, and the referral process for assisting individuals to access BHA support.
- Assure that DORS counselors are aware of the BHA liaisons in their offices so they may receive consultation in the identification and provision of appropriate support services.

*Methodology: DORS Public Meetings*

Attendees were asked about providing services for students with mental health issues as an underserved population.

*Needs/Concerns Identified:*

- Assure information regarding Pre-Employment Transition Services is being made available to BHA providers who could consider developing these programs.
- Continue to collaborate with BHA in the development of IPS (Individualized Placement Services) services for Students and/or transition age youth.
- Collaborate with BHA in the provision of Early Intervention Program (EIP) for youth in their initial psychotic episode.

*Recommendations:*

- Continue to work with BHA providers to develop Pre-Employment Transition Services for transitioning students.
- Maintain collaborative efforts with BHA in the development of IPS services for students and transition age youth and in the provision of the EIP.
- Use DORS media to highlight programs that emphasize DORS and BHA collaboration in providing services to transitioning students.

**(B) who are minorities;**

The Maryland 2013 Comprehensive Assessment of the Needs of Individuals with Disabilities identified a need for DORS to enhance services to minority individuals with disabilities, focusing especially on those from the Hispanic and Asian communities. DORS continues to be committed to increasing and improving services for minority populations.

*Prevalence*

According to the 2010-2014 US Census, 14.2 percent of the population in Maryland are foreign-born, and 47.5 percent of these individuals are naturalized U.S. citizens.

**Hispanic:**

- 8.8 percent of the population is identified as Hispanic (2010: 8.2 percent).
- 7.0 percent of the population here five years or more speak Spanish at home, and, 3.2 percent indicate they speak English less than “very well.”

**Asian:**

- 5.9 percent of the population is identified as Asian (2010: 5.5 percent).
- 3.7 percent of the population here five years or more speak a foreign language at home, and 1.6 percent indicate they speak English less than “very well.”

### *Methodology*

AWARE data was reviewed to assess the numbers of individuals served by DORS who speak a foreign language, and the numbers of Hispanic and Asian served, in particular. As indicated in below, DORS has maintained consistent service levels for individuals from Hispanic backgrounds and has seen a modest increase in individuals served from Asian backgrounds:

Hispanic:

- FY 13 numbers served: 721 (3.0 percent of total served)
- FY 14 numbers served: 722 (3.0 percent of total served)
- FY 15 numbers served: 725 (3.0 percent of total served)

Asian:

- FY 13 numbers served: 588 (2.0 percent of total served)
- FY 14 numbers served: 607 (2.2 percent of total served)
- FY 15 numbers served: 650 (2.4 percent of total served)

### *Needs/Concerns Identified:*

- Individuals from Hispanic and Asian backgrounds continue to be underrepresented among individuals receiving services.
- Less than one percent of those served during the past three years report having a primary language other than English, suggesting that individuals for whom English is a second language may not know how to access services.
- More than half of the foreign-born individuals are not U.S. citizens.

### *Methodology -DORS Public Meetings*

Attendees commented on the unmet needs of individuals who are minorities.

### *Needs/Concerns Identified*

- Comments focused on the need for an increase in the number of foreign languages for which interpretation is available, as well as for more flexibility in scheduling. Currently, the state contract provider requires a minimum of two weeks notice to schedule an interpreter, and has a 24 hour cancellation policy.
- A CRP providing services in the D.C.-Metro area spoke to the need to deliver presentations about services in person, using presentation materials in the language of the target audience, and spoke of having introductory remarks for her business available in multiple languages, including Spanish, Hindi, Mandarin, Portuguese, German, and French.
- DORS staff also noted during this CSNA the need for standard letters to be available in foreign languages, as the Application for Rehabilitation Services is already.

### *Recommendations*

- Consider targeted outreach efforts, in collaboration with workforce and education partners, to increase the numbers of minorities provided VR services, with emphasis on Hispanic and Asian individuals with disabilities.
- In addition to providing the Application for Rehabilitation Services and other required documents in foreign languages, provide a catalogue of standard letters in the same foreign languages for which the application is already available to ensure individual understanding of services, their rights, and responsibilities, during the rehabilitation process.
- Equip counselors with information to share with non-Citizens on how to become legally allowed to work in the U.S.

### **(C) who have been unserved or underserved by the VR program;**

Certainly, as it was during the 2013 CSNA, individuals on the waiting list continue to be the most recognizable underserved population, and their needs and how the agency may address those needs are addressed here. In addition, other unserved and underserved populations have also been identified.

Due to budget reductions which lead to loss of positions, lengthy delays in filling vacant positions, WIOA requirements, and other factors, the agency has been unable to remove any consumers from the waiting list since April 2015. These factors have also caused staff to have less opportunity to reach out to unserved and underserved populations.

### *Prevalence*

During the past three years, the primary counselor assigned to a caseload has changed for nearly 50 percent (60 out of 124) of the agency's VR caseloads. Slightly less than 50 percent of these caseloads are currently assigned to VR technical specialists, suggesting that at least half of the agency's consumers are currently being served by counselors with less than three years of experience.

### *Methodology - DORS Public Meetings*

Attendees identified multiple groups of individuals who could potentially be considered unserved or underserved by DORS.

- Consumers who are currently on the DORS waiting list (Category II).
- Consumers who appear to be higher functioning than they really are. More comprehensive assessment for individuals with Asperger's Syndrome or who have had traumatic brain injuries, for instance, may be needed to determine their true order of selection.
- Transient individuals, including youth in and out of foster care programs.
- Individuals, including students, with persistent mental illness or dual diagnosis, unspecified learning disabilities, and Autism.
- Refugees

Potential barriers to receiving VR services experienced by these groups are listed in the needs and concerns below:

### *Needs/Concerns Identified*

- DORS caseloads are large and expected to grow larger due to regulatory changes, as is the DORS waiting list; decreasing staff opportunity to provide targeted outreach.
- Communication/language barriers decrease effectiveness of print materials.
- Lack of transportation needed to apply for or participate in services.
- Lack of direct services available in rural areas (e.g. Western Maryland and Eastern Shore), especially for individuals with TBI or individuals who are deaf/blind;
- Insufficient college programs to support students with Autism.
- Lack of quality controls, leading to inconsistency in service delivery practices from one office to the next.

### *Recommendations:*

- DORS should conduct a detailed analysis of which work functions, including current case management procedures, are required and who must perform them to ensure that required services are consistently and appropriately provided, in light of the publication of the WIOA final regulations on August 19, 2016. Such an analysis should include input from front-line counselors, district supervisors, regional directors, network technicians and programmers, and others, as needed, to ensure a comprehensive review process.
- DORS may wish to pilot various case management approaches which appear to hold promise. For instance, the agency may choose to assign counselors a specialty based upon their work strengths. For example, Counselor A may meet with a consumer to gather all pertinent intake information (e.g. demographics, documentation of disability, etc.), then Counselor B may provide all services related to implementation of the IPE, while Counselor C may manage all financial matters for an assigned number of consumers (e.g. issue and track purchase authorizations and Maintenance and Transportation logs), Counselor D may assist consumers to access services in the community to address barriers affecting their ability to become or maintain employment.
- DORS may wish to recruit at least two other workforce programs to apply together for the Workforce Innovation Technical Assistance Center (WINTAC) grant to pilot a new approach to communicating with consumers, using Smartphone technology. This approach could assist personnel within these programs to acquire required documentation for federal reporting.
- DORS may wish to consider moving further in the direction of becoming fully electronic by permitting field office staff to shred, rather than file in hard copy folders, all documents which they first scan and attach into the AWARE case management system.
- DORS may also wish to finalize an approach to be used for obtaining electronic signatures, which would, among other advantages, assist staff to be more efficient in sending out authorizations for services.

As DORS navigates changes in policies and procedures related to WIOA regulations, an analysis of case management will need to occur to ensure compliance with WIOA regulations and that DORS meets the rehabilitation needs of the unserved and/or underserved groups listed above.

### *Methodology: DORS Survey*

As part of the current Needs Assessment, a survey was made available on line to consumers, advocates, families and community rehabilitation programs. 226 responses were received from consumers, parent/guardians, family members and service providers.

### *Needs/Concerns Identified:*

The survey asked respondents to identify any unmet rehabilitation and employment needs of individuals with disabilities:

- 28 percent mentioned inadequate employment options,
- 27 percent of respondents raised customer service and procedural concerns, including responsive communication, timely return of administrative approvals, and completion of required documentation,
- 12 percent spoke of the need for more training options,
- 10 percent raised transportation-related concerns,
- 8 percent raised issues around the waiting list, and
- 5 percent mentioned the need for DORS staff to be more actively reaching out to the community.

### *Recommendations*

- In collaboration with WIOA workforce partners, provide staff training on labor market analysis, utilizing readily available online tools and software to assist in vocational guidance and counseling during plan development and the job search process.
- Develop a system for consumers to provide feedback on their satisfaction with services at key points during the rehabilitation process, such as after their initial interview (Do they have any questions?), while on the waiting list (Have they been referred to other WIOA workforce programs?), after development of the Individualized Plan for Employment (Do they understand their plan and believe they will become employed as a result of this plan?), and after they have been referred to a CRP for job placement (Is the job developer identifying job leads that fit their experience, interests, abilities, etc.?).
- Develop a quality control system for evaluating how effectively and accurately staff integrate policy and procedure change into their work routine. This approach should encourage staff feedback, and include a rapid response when staff development needs are identified.

### *Methodology - Key Informant Interview and Data Analysis*

Data analysis and interview with the DORS staff specialist for Social Security Programs in the DORS Program Income office, regarding the status of individuals on the waiting list who are Social Security claimants and recipients.

### *Needs/Concerns Identified*

- Individuals may be placed on the waiting list, while their applications for Social Security benefits are pending, or may choose to apply for Social Security benefits at any time after being placed on the waiting list.
- 39 percent of DORS consumers on the waiting list reported being Social Security recipients at the time of application.

- Via the Ticket to Work Verification Portal, DORS Program Income staff determined that 44 percent of those currently waiting for services are Ticket holders, indicating that at least five percent of consumers on the waiting list became Social Security beneficiaries after entering the waiting list.
- Since counselors and consumers do not routinely communicate during this waiting period, counselors often miss potential opportunities to request new diagnostic information from the Disability Determination Services regarding their consumers—information which, if available, may provide sufficient support for increasing their consumer's disability priority to Category I: Most Significantly Disabled.
- These individuals may be considered underserved because they are most likely not being advised by their DORS counselors of services available through Work Incentive Program and Assistance (WIPA) providers and/or Employment Networks.

*Recommendations:*

- Develop a system for routinely comparing the DORS waiting list with the Disability Determination Services (DDS) list of open claims so that counselors may have the opportunity to secure the consumer's permission to request any available documentation when it is most readily available.
- Implement a strategy for informing Social Security beneficiaries in general and Social Security Ticket to Work holders in particular about WIPA and EN services that may be available while they are waiting for agency services to be available.

**(D) who have been served through other components of the statewide workforce development system; and**

*Introduction:* Maryland's state Combined Workforce Plan

In October 2015, Governor Larry Hogan determined that Maryland would have a combined state plan, requiring the DLLR, the DHS, and the MSDE to work collaboratively to develop a strategic and operational plan to include the following programs:

<b>WIOA State Plan Program</b>	<b>Core WIOA Program as determined by law</b>	<b>Additional WIOA Program as determined by Governor</b>	<b>MD state Agency Responsible for Oversight</b>
Adult Program			DLLR
Dislocated Workforce Program			DLLR
Youth Program			DLLR
Wagner-Peyser Act Program			DLLR
Adult Education and Family Literacy Act Program			DLLR
VR Program			MSDE
TANF Program			DHS
Trade Adjustment Assistance for Workers Program			DLLR
Jobs for Veterans State Grant (JVSG) Program			DLLR
Unemployment Insurance**			DLLR

<b>WIOA State Plan Program</b>	<b>Core WIOA Program as determined by law</b>	<b>Additional WIOA Program as determined by Governor</b>	<b>MD state Agency Responsible for Oversight</b>
SCSEP**			DLLR and Senior Service America, Inc
RExO			Seedco and Bon Secours
<i>** = New addition to Maryland Combined State Plan effective 2018-2020</i>			

## *Maryland AJCs*

### *Prevalence*

During the previous three years, the agency has seen a decrease in individuals reporting that they were referred by the AJCs.

- FY 13: 361 individuals referred
- FY 14: 280 individuals referred
- FY 15: 221 individuals referred

The agency would like to investigate the reason for this decline, so that this trend may be reversed, and the partnership between these programs may be strengthened.

### *Methodology: DORS Survey of AJC Personnel*

To assess how effectively DORS staff are collaborating with the Maryland AJCs a survey was distributed to the staff of these Centers in Maryland. Fifteen surveys were completed and will be used in this assessment of the utilization of the Maryland AJCs by individuals with disabilities. The results of the survey are as follows:

- When asked how often do you collaborate /partner with the DORS staff, 13.3 percent of respondents replied “Never,” 73.3 percent replied “Occasionally,” and 13.3 percent replied “Frequently.”
- When asked to rate on a scale of one to ten (with one being completely unsatisfied and ten being completely satisfied) their overall satisfaction working with DORS, the satisfaction rating came to an average of 70 percent with the majority responding with a rating of eight or higher.
- When asked about their awareness of services provided through the DORS to individuals with disabilities to help them develop employment related skills, 73.3 percent of respondents indicated that they are aware of VR services and 26.7 percent indicated that they were not aware.
- When asked whether they have received information or training on what is considered an appropriate referral to the Division, 60 percent indicated that they had at least some training and 40 percent indicated they had not been trained.
- When asked whether they had referred individuals to the Division for services, 73.3 percent indicated that they had and 26.7 percent indicated that they had not.
- Of those who advised that they had referred individuals to the Division, 45.4 percent indicated that these referrals resulted in the individual receiving services, and 54.5 percent indicated that they did not know whether the individuals had begun receiving services.

### *Needs/Concerns Identified*

- The results of the surveys completed by the staff of the Maryland AJCs indicate a general knowledge of the Maryland DORS and the help and services provided to individuals with significant disabilities to help them prepare for and find employment.
- 86.6 percent of the Maryland AJC respondents indicate they collaborate with DORS staff “occasionally” or “frequently.” A majority of the respondents (73.4 percent) did indicate “occasionally” when responding to this question.

- 54.5 percent of those who made referrals to the Division were unaware of the outcome of those referrals.

*Methodology: Public Meetings*

Additional information on how the Maryland AJCs are utilized by individuals in the state in gaining employment was obtained by the DORS during the annual meetings that it conducts as part of its yearly planning process. During these public meetings DORS counselors, service providers, and job seekers were asked a set of questions to gain a better understanding the AJCs' role in the rehabilitation and employment process.

*Needs/Concerns Identified*

- The responses given by individuals attending the public meetings indicated that the services offered by the AJCs are difficult to access and are not geared to individuals with disabilities.
- Individuals with disabilities who do try to use the AJCs are often referred to the DORS for help in finding employment.

*Recommendations*

- Since the survey indicates that the staff of the AJCs have received limited training on when an individual with a disability would be appropriate to refer to the Division for services to assist them in becoming employment ready, the Division may wish to explore the understanding of the AJC staff as to when it is to the benefit of the individual to be referred to the Division for services.
- Develop a strategy for sharing outcome information with the AJCs regarding individuals served by both programs

*Other Workforce Programs*

*Prevalence*

During this 2016 CSNA, DORS utilized a variety of methodologies to assess the approximate numbers of individuals with disabilities in Maryland served by partner programs identified within the Maryland State Combined Workforce Plan.

*Methodology: Literature Review*

The Maryland DLLR DWDAL WIA 2014 Annual Report was reviewed for information regarding the numbers of individuals with disabilities who were accessing services through WIA partner programs.

During PY14:

- The Adult Program served 207 individuals with disabilities.
- The Dislocated Worker Program served 130 individuals with disabilities.
- The Youth Program served 637 youth with disabilities.
- The Wagner-Peyser Act Program served 9,388 individuals with disabilities.
- The Adult Education and Literacy Services Program served 680 individuals with disabilities.

### *Methodology: DORS and Maryland DHR Data Review*

Each year between FY 13 and FY 16, about 650 DORS consumers reported receiving financial support from DHR when they applied for VR services.

During FY 16, DHR provided TCA to 6,611 adults with disabilities. In addition, DHR provided long-term Temporary Disability Assistance Program (TDAP) support for 16,751 individuals with disabilities.

### *Needs/Concerns Identified*

- The number of individuals with disabilities referred to DORS from the DHS is expected to increase during the next three years, as DHR, DLLR, and DORS roll out a TCA/Workforce Innovation Opportunity Act (WIOA) partnership across the 12 Local Areas in Maryland.
- Identify DORS counselors to serve as liaisons to the LDSS offices in each of the 12 jurisdictions.

### *Methodology: Maryland Judiciary Case Search*

During this CSNA, DORS sought to determine the approximate number of DORS consumers who may require assistance overcoming barriers to employment resulting from having a record of arrest or conviction found in the Maryland Judiciary Case Search. Out of 23,808 individuals who applied for DORS services between FY 13 and FY 15, fifty (50) were randomly sampled, and their names and birth dates were looked up in the Maryland Judiciary Case Search. Of these, 56 percent (28) were found to have a history of being subject to some stage of the criminal justice process within Maryland.

### *Needs/Concerns Identified*

- Due to the lower number of consumers randomly sampled for this Maryland Judiciary Case Search process, the percentage reported here is not statistically significant and should be viewed cautiously. However, this result suggests that additional review is warranted.
- DORS has not consistently used one field in the AWARE case management system over time to track the number of individuals who report having a history of justice involvement or who have lost job offers due to background checks.
- Based on anecdotal reports from DORS Business Service Representatives and Employment Specialists, as well as CRP job development staff, it does appear that businesses frequently perform background checks and subsequently revoke job offers made to DORS consumers. These instances have the potential to jeopardize job opportunities for future DORS consumers.

### *Recommendations*

- Identify DORS counselors to serve as liaisons for LDSS offices, and provide opportunities for mutual staff training.
- Provide training to familiarize DORS staff with the services available from the various partner programs in the combined state plan, including those who can assist DORS consumers who have records of arrest or conviction.

- Provide information to counselors on industries and business in Maryland which routinely run background checks before hiring, so counselors can have that for reference when providing vocational guidance and counseling, especially during plan development and prior to job search.

### *Maryland Community Colleges*

With the implementation of WIOA, there is increased focus on the outcomes of individuals involved in post-secondary education, in general, as well as an expectation that workforce programs, including VR, will utilize community colleges to prepare individuals for employment within the local labor market. Community colleges continue to remain a major component of Maryland's Workforce Investment System, as well as a primary training provider to DORS consumers for both credit and non-credit instruction leading to workforce certificate training.

While strides have been made partnering with community colleges there are additional objectives to be met, including advancing apprenticeship as a workforce strategy. Working with community colleges to expand the scope of services provided through RA Programs could help state and local workforce systems transform how they meet the needs of businesses and workers and fully achieve the vision for the workforce system under WIOA.

### *Methodology: Review of DORS Service Data*

The closed cases of consumers for whom DORS authorizations were issued to community colleges in Maryland before or during the past three federal FYs were reviewed.

### *Discussion*

During the past three federal FYs, DORS closed the cases of 823 individuals after providing financial assistance for them to attend community college programs. The chart below provides data on the rehabilitation rate of these DORS consumers, the count of individuals closed unsuccessfully and successfully, the total paid to each college and the average cost per individual.

<b>Community College</b>	<b>Rehab Rate</b>	<b>Closed Unsuccessful</b>	<b>Closed Rehabilitated</b>	<b>Grand Totals</b>		
	<b>Percent</b>	<b>Count</b>	<b>Count</b>	<b>Count</b>	<b>Paid</b>	<b>Avg. Cost</b>
Allegany College Of Maryland	60.87 percent	9	14	23	\$37,580	\$1,634
Anne Arundel Community College	56.41 percent	17	22	39	\$62,685	\$1,607
Baltimore City Community College	52.63 percent	9	10	19	\$25,588	\$1,347
Carroll Community College	49.23 percent	33	32	65	\$95,018	\$1,462
Community Colleges of Baltimore County	56.54 percent	83	108	191	\$403,425	\$2,112
Cecil College	78.57 percent	3	11	14	\$17,169	\$1,226
Charles County Community College	50.00 percent	1	1	2	\$1,894	\$947
Chesapeake College	76.47 percent	4	13	17	\$40,419	\$2,378

	<b>Rehab Rate</b>	<b>Closed Unsuccessful</b>	<b>Closed Rehabilitated</b>	<b>Grand Totals</b>		
College of Southern Maryland	49.31 percent	73	71	144	\$204,256	\$1,418
Frederick Community College	56.25 percent	14	18	32	\$49,314	\$1,541
Garrett College	50.00 percent	4	4	8	\$11,433	\$1,429
Hagerstown Community College	56.52 percent	20	26	46	\$51,849	\$1,127
Harford Community College	25.00 percent	15	5	20	\$31,317	\$1,566
Howard Community College	45.24 percent	23	19	42	\$72,658	\$1,730
Montgomery College	65.43 percent	28	53	81	\$92,077	\$1,137
Prince George's Community College	44.68 percent	26	21	47	\$66,986	\$1,425
Wor-Wic Community College	70.97 percent	9	22	31	\$26,690	\$861
Grand Total	55.50 percent	371	450	821	\$1,290,360	\$1,475

During the past three federal FYs, DORS has provided financial assistance for 906 individuals to attend community college programs. The cases for 620 of these individuals are still open. The chart below provides data on the rehabilitation rate of the 285 consumers whose cases have already been closed.

	<b>Rehab Rate</b>	<b>Closed Unsuccessful</b>	<b>Closed Rehabilitated</b>	<b>Grand Total</b>
<b>Community College</b>	<b>Percent</b>	<b>Count</b>	<b>Count</b>	<b>Count</b>
Allegany College of Maryland	57.14 percent	3	4	7
Anne Arundel Community College	85.71 percent	2	12	14
Baltimore City Community College	33.33 percent	2	1	3
Carroll Community College	60.00 percent	6	9	15
Community Colleges of Baltimore County	72.46 percent	19	50	69
Cecil College	100.00 percent	0	3	3
Chesapeake College	80.00 percent	2	8	10
College of Southern Maryland	71.70 percent	15	38	53
Frederick Community College	75.00 percent	2	6	8

	<b>Rehab Rate</b>	<b>Closed Unsuccessful</b>	<b>Closed Rehabilitated</b>	<b>Grand Total</b>
Garret College	50.00 percent	1	1	2
Hagerstown Community College	87.50 percent	2	14	16
Harford Community College	100.00 percent	0	3	3
Howard Community College	53.85 percent	6	7	13
Montgomery College	66.67 percent	11	22	33
Prince George's Community College	58.82 percent	7	10	17
St Marys College Of MD	N/A	0	0	0
Wor-Wic Community College	84.21 percent	3	16	19
Grand Total	71.33 percent	81	204	285

*Analysis:*

- When considering all 821 individuals whose cases were closed during the past three FYs after having received financial assistance for community college participation at some point while their case was open with DORS, the success rate is 54 percent.
- After subtracting the 285 individuals who participated in community college programs during the past three years (285) from the 3-year total of all cases closed (821), the remaining 536 individuals are those who participated in community college programs prior to FY 13 and who were closed during the last three years. The success rate of these individuals is 46 percent.
- The success rate of the 285 individuals who participated in community college programs during the past three years and whose cases were subsequently closed was 71 percent.

*Needs/Concerns Identified*

- Community college participation appears to be quite effective in preparing individuals with disabilities for employment when brief training is sufficient for them to become employed.
- Community college participation appears to be less likely to result in successful employment outcomes when the individual's participation in that training occurred several years ago. This may be due to a number of reasons. For instance, these individuals may have chosen not to continue attending community college after giving it try, or they may be continuing after not achieving the grades necessary to continue receiving DORS funding and choosing to have their cases closed, or they may have continued on to further their education and then lost touch with their DORS counselor.

## *Recommendations*

- DORS consumers who have attended Cecil College, Chesapeake College, and Wor-Wic Community College, and, within the past three years especially, Anne Arundel Community College, Frederick Community College, and Hagerstown Community College, appear significantly more likely to have had their cases closed successfully employed. This merits further exploration into the partnership practices of the DORS staff and Disability Support Services (DSS) staff at those particular community colleges in order to determine whether there are any promising practices contributing to that success.
- The agency may also want to study why very few authorizations are being issued to certain community colleges, as this may be indicative of assistance being provided in another way, such as providing Maintenance and Transportation expenses for college, which were not taken into consideration here, or this may be indicative of a perceived lack of training opportunities for individuals with disabilities in those areas.
- The agency may also find it helpful to collaborate with community colleges at an organizational level to track the education and employment success of individuals with disabilities after they exit community college programs, especially as these are common measures shared by all workforce programs, including community colleges.

## *Methodology: Disability Support Services Professionals Survey*

An online survey for Disability Support Services (DSS) professionals was used to evaluate how effectively DORS collaborates with DSS staff to meet the needs of students with disabilities. This survey was sent directly to members of the Maryland Association of Higher Education and Disability (MD-AHEAD), and was also made publicly available on the DORS website during the three weeks that it was available. 28 individuals provided responses to the survey questions.

## *Survey Responses:*

- When asked if they refer consumers to DORS, 67 percent indicated that they do.
- When asked how often they partner with DORS staff, 57 percent stated occasionally, 25 percent stated frequently and 17.9 percent indicated never.
- When asked to rate their overall satisfaction with DORS (with one being completely unsatisfied and ten being completely satisfied), 24 individuals responded to this question, and the average overall satisfaction rating with DORS was five.
- When asked what assistance or services are most requested from DORS, respondent answers clustered around the following partnership activities and services:
  - Collaboration on various transition activities with the high schools, such as DSS and student college orientations
  - Funding to assist students with higher education costs
  - Counselor consultation about student accommodations and academic goals
  - Assessment services to assist with documenting student need for reasonable accommodation
  - Assistance for students to acquire and learn to use adaptive technology
  - Social skills groups for individuals on the Autism spectrum
    - Weekly one on one and small group meetings during the school year (the DORS Pathways Program)

When asked about their expectations when working with a DORS counselor, respondent answers suggested that the following attributes were most important:

- Professionalism, including timely services and responsiveness to students and DSS personnel.
- Competency, including knowledge regarding higher education and reasonable accommodations
- Provision of technical assistance, equipment and training, and additional resources that the college may not provide and of which the college personnel may be unaware.

#### *Needs/Concerns Identified*

- Although 67 percent of those surveyed, indicated that they do refer consumers for DORS services, they do not all collaborate with DORS staff, and the majority of those who do (57 percent) indicated that they do so only occasionally.
- DSS professional staff indicated that their overall satisfaction with DORS staff was five on a scale of one-to-ten.
- DSS professional staff indicated that they most frequently refer students for accommodations, tuition assistance and Assistive Technology from DORS staff.
- It appears that DSS staff expects DORS staff to be professional, knowledgeable, and responsive in a timely manner, and to provide additional resources and be competent and responsive.

#### *Recommendations*

- Consider establishing a liaison relationship with each DSS office, to strengthen the partnership between DORS field staff and DSS staff in community colleges, as not all community college DSS professionals are familiar with DORS services and support.
- Pursue training for DORS staff on 504 and accommodations in higher education.

#### *Methodology: Public Meeting Forum*

During the 2016 DORS Public Meetings, attendees were asked several questions regarding Maryland Community Colleges, including:

- How effectively are community colleges addressing the needs of students with disabilities?
- What barriers to success do students with disabilities encounter at community colleges?
- How can DORS best work with community colleges to facilitate the success of students with disabilities?

#### *Needs/Concerns Identified*

- Some Community College staff come across as not open to assisting students,
- Community Colleges provide recommended accommodations differently in different locations, sometimes using older equipment as an accommodation and often depending on the professor's interest and willingness to accommodate.

- One community college was reported as refusing to provide physical accommodations for a student to navigate through a door.
- One community college was reported as refusing to provide interpreter services within the classroom.
- One community college was reported to discourage students with disabilities from registering for full-time schedules, assuming inability due to disability.
- Community college personnel report not being allowed to talk with parents.

An attendee suggested that the DORS Business Service Representatives or the DORS Transition Staff Specialist, once hired, could offer education on accommodations and support services to facilitate the success of students with disabilities in college settings.

#### *Recommendations*

- To facilitate the success of individuals with disabilities being served at community colleges, first ensure that they are not spending extra time trying to facilitate communication between DORS and DSS.
- Significant accommodation and accessibility issues were raised. Improved communication between DORS and DSS will facilitate more timely, proactive, and collaborative responses to these issues before too much time has elapsed for the student to be successful.

#### *Methodology: Literature Review*

CSNA committee members reviewed the USDOL (DOL) Office of Disability and Employment Policy (ODEP) July 2015 report on [RA PROGRAMS: IMPROVING THE PIPELINE FOR PEOPLE WITH DISABILITIES](#), and USDOL data regarding apprenticeship opportunities and participation in Maryland.

#### *Discussion*

- 91 percent of RA Program participants remain employed after completing their programs, with average annual starting wages above \$50,000.
- Nationally, more than 52,500 participants graduated from the apprenticeship system during FY 15.

According to The USDOL, the chart below shows Maryland's 2014 FY Totals as it relates to Apprenticeships:

state Name	Active Apprentice	New Apprentices	Completers	Active Programs	New Programs
Maryland	9,130	3,630	545	1,228	88

### *Needs/Concerns Identified*

- DOL found that, despite their initiatives in promoting apprenticeship, a majority of disability-serving organizations that work with people with disabilities may not be aware of the potential that exists for creating pre apprenticeship or RA programs.
- The scarcity of apprenticeship programs for people with disabilities suggests that disability service providers need to be made aware of RA programs and of the important role they can play in partnering with RA sponsors to support making RA opportunities available to more people with disabilities.
- Promoting more apprenticeship training through apprenticeship-community college collaboration can help to reduce costs for RA sponsors and disadvantaged students, including youth with disabilities, while also offering apprentices the benefit of earning college credits from community colleges.
- Need to increase recruitment efforts and tracking of apprenticeship participation and success at the community college and DORS level.
- During transition planning, students with disabilities should be encouraged to consider apprenticeship programs.
- Employer impressions of individuals with disabilities in general may be still be limiting the number of apprenticeship opportunities available to this population.

### *Recommendations*

- Collaborate with the DLLR, MSDE, and the Maryland Higher Education Commission (MHEC) to convene a roundtable of employers to discuss how to increase the number of individuals with disabilities participating in pre-apprenticeship and apprenticeship programs in growth industries in Maryland.
- Identify community colleges to provide basic skills training and pre-apprenticeship programs to prepare students with disabilities for future apprenticeship opportunities as a pre-employment transition service (work readiness).
- Use the Workforce and Technology Center (WTC) in various ways to increase the number of businesses offering apprenticeships in growth industries in Maryland and to increase the number of individuals with disabilities involved in these programs, such as:
  1. Assisting WIOA workforce partners to establish pre-apprenticeships and RA programs.
  2. Hiring additional DORS/WTC staff to provide consultation services to Community Colleges, DLLR and businesses, as needed to ensure individuals with disabilities are fully included in these pre-apprenticeship and RA programs.
  3. Assessing and recruiting youth and adults with disabilities for pre-apprenticeship programs and RA programs, and collaborating with BSR's and Pre-Employment Transition Services (Pre-ETS) providers to incorporate apprenticeships into transition planning.
  4. Explore if WTC can provide related technical instruction that can be used within a RA program.

(E) who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

## **1. Their Need for Pre-Employment Transition Services (Pre-ETS) or Other Transition Services.**

### *Prevalence*

The need for pre-employment transition services and other transition services in Maryland is most evident when reviewing the post-school outcomes of students receiving Special Education, as reported on the Maryland Report Card.

- In 2014, 4.73 percent of students in Grades 9-12 receiving Special Education services dropped out of school, compared to 2.72 percent of students in regular education.
- 70 percent of the Class of 2014 students receiving Special Education services graduated high school, compared to 90 percent of students in regular education.
- Similarly, in 2014, 41.5 percent of students who received Special Education services in high school were attending college 16 months post high school, compared to 72.1 percent of students who were in regular education.

Theoretically, students receiving pre-employment transition services to increase, for instance, their self-advocacy and independent living skills, would be encouraged to remain in high school and plan to pursue post-secondary education or employment. One would also expect that many of the Maryland high school students with Intellectual Development Disorder (IDD) or Autism who entered Grades 9-12 during 2015 would certainly benefit from such services. Regarding these students, the MSDE provides the numbers below.

#### High School Students with Intellectual Development Disorder (IDD):

- 9th Grade - 623
- 10th Grade - 476
- 11th Grade - 514
- 12th Grade - 665

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Total – 2,278

#### High School Students with Autism:

- 9th Grade - 883
- 10th Grade - 716
- 11th Grade - 748
- 12th Grade - 692

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Total – 3,039

During summer 2016, the George Washington University conducted an inter-disciplinary survey of VR and special education staff involved in providing transition services specifically for students with autism. Of the 15 respondents who were from Maryland, 70 percent indicated that students, youth, and young adults seeking higher education do so by pursuing a two-year community college program.

## **2. Assessment of the Needs of Individuals with Disabilities for Transition Services and Pre-Employment Transition Services and the Extent To Which Such Services Are Coordinated with Local Education Agencies**

DORS would like to assess the current need for Pre-Employment Transition Services (Pre-ETS) Statewide as well as what the availability is of such services. As a result of the WIOA of 2014 (WIOA), DORS is now required to set aside 15 percent of the federal allotment to provide Pre-Employment Transition Services to students with disabilities between the ages of 14 and 21, and are to be available to all students with disabilities regardless of the severity of their disability.

Pre-ETS are very specific in nature and include the following:

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs
- Workplace readiness training to develop social and independent living skills
- Instruction in self-advocacy, including peer mentoring

#### *Background*

DORS has been reviewing proposals submitted by CRPs, secondary schools, and colleges and universities, desiring to begin offering pre-employment transition services as a fee-for-service. The current, statewide distribution of these offerings is below:

- Region 1 has one CRP and one secondary school (Maryland School for the Deaf)
- Region 2 has three CRPs and two college programs
- Region 3 has three CRPs and one secondary school (Maryland School for the Blind)
- Region 5 has no CRPs and one college program
- Region 6 has five CRPs and no secondary or college programs

There are three additional programs available out-of-state for students who are deaf.

DORS seeks to use this CSNA to acquire a better understanding of the numbers of potentially eligible VR consumers who will be able to participate in these services in the next few years, as well as which LEAs are already providing these services, and where there may be opportunities for collaboration.

#### *Methodology: Survey of Local Education Agencies (LEA)*

- Surveys were sent to each of the Local Education Agencies to determine (1) which of the five Pre-Employment Transition Services are currently provided by the schools as part of secondary transition, (2) of those services provided, which can be further enhanced by partnering with DORS, and (3) which services are not currently available in their respective geographical areas.
- Data collection related to the number of potential Pre-Employment Transition Services applicants statewide utilizing both data provided by MSDE and data found on the Maryland Report Card.

#### *LEA Survey Responses*

Note: The information summarized below represents only the responses received from seven of the local education agencies surveyed. This is considered a representative sample for purposes of this CSNA.

#### **Job Exploration Counseling:**

- Baltimore County Public Schools
- Caroline County Public Schools
- Carroll County Public Schools

**Work-Based Learning:**

- Baltimore City Public Schools
- Caroline County Public Schools
- Carroll County Public Schools
- Dorchester County Public Schools
- Howard County Public Schools
- Worcester County Public Schools

**Counseling on Enrollment Opportunities:**

- Baltimore City Public Schools
- Caroline County Public Schools
- Carroll County Public Schools
- Worcester County Public Schools

**Workplace Readiness Training:**

- Baltimore City Public Schools
- Baltimore County Public Schools
- Caroline County Public Schools
- Carroll County Public Schools
- Dorchester County Public Schools
- Worcester County Public Schools

**Self-Advocacy Instruction:**

- Caroline County Public Schools
- Carroll County Public Schools
- Worcester County Public Schools

*Needs/Concerns Identified*

**Baltimore County Public Schools:**

- Not enough school staff to do career exploration in the community
- Would like to see DORS assist with Career exploration – maybe through presentations
- Would like to see DORS assist with job development for those required to complete service learning hours
- Need workplace readiness training available for diploma kids
- Need Self-Advocacy Instruction

**Baltimore City Public Schools:**

- Travel Training
- More Career Assessments and job exploration counseling
- More job readiness and placement opportunities

**Carroll County Public Schools:**

- More Counseling on Post-Secondary enrollment opportunities

**Dorchester County Public Schools:**

- Expand work-based learning opportunities

**Howard County Public Schools:**

- Summer Employment not available

**Worcester County Public Schools:**

- More opportunities for Career counseling for diploma kids A need to expand work
- More work based learning, work readiness training, self-advocacy instruction needed for diploma kids

**Maryland School for the Blind**

- More Pre-Employment Transition Services in general for those with severe developmental disabilities
- More work based learning for blind students
- More opportunity for Workplace readiness skills

*Methodology: Data Collection*

Students with 504 Plans in 2015

(Source: Maryland Report Card):

- Elementary Students – 8,317
- Middle School Students – 8,010
- High School Students - 10,379

Total - 26,706

High School Students with Individualized Education Plans (IEP) in 2015  
(Source: MSDE):

- 9th Grade – 9,973
- 10th Grade – 7,232
- 11th Grade – 6,110
- 12th Grade – 4,025

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Total - 27,340

Total Number of Students Potentially Requesting Pre-ETS in FY 16: 37,719

*Needs/Concerns Identified*

- It is anticipated based on data collected that the number of students accessing DORS services will increase each year
- It is anticipated based on data collected that the number of HS students with Autism will increase each year
- It is anticipated that the number of students with IDD accessing DORS services will increase each year as a result of WIOA requirements related to Section 511
- DORS Transitioning caseloads will continue to grow each year;

*Recommendations*

- DORS needs to continue to expand the availability of Pre-Employment Transition Services statewide, and especially in DORS Region V.
- DORS needs to align its staffing and caseload assignments to have sufficient counselors available to coordinate the provision of pre-employment transition services.

### **3. Pre-Employment Transition Services 15 percent Set-Aside Calculation.**

#### *Number of Students with Disabilities in the state*

In any given year over the next four years, approximately 10,000 high school students with 504 plans and 27,000 students with Individualized Education Plans could potentially request pre-employment transition services.

During federal FY 15, DORS received 1,061 applications from students in school who were less than age 22. During federal FY 16, DORS received 1,527 applications from students in school as of August 24, 2016, and anticipates an additional 100 applications from students in school by September 30, 2016. Given these numbers, DORS is projecting the number of applications from students with disabilities to increase by approximately 50 percent each year for the next three years, as follows:

- FY 17: 2,440 students
- FY 18: 3,660 students
- FY 19: 5,490 students

**Estimated Total: 11,590 students**

#### *15 percent Reserve Fund Usage to Date and Fiscal Forecasting:*

In FY15, the agency needed to reserve \$6,000,000, which was the equivalent of 15 percent of its VR grant for that year. Assuming that figure does not change over the next three years, then DORS will need to pay \$18,000,000 in the provision of pre-employment transition services between FY 17 and FY 19.

At the close of FY 16 and after 24 months available to spend the initial 15 percent reserved out of the FY 15 VR grant, DORS will have spent approximately \$4,000,000 in pre-employment transition services, including purchased services, agreements for Pre-ETS Summer Youth Employment Programs, and DORS personnel costs. That is an average of \$2,000,000 per year. During that same period of time, 1,850 students will have been served. This means the average per student cost for pre-employment transition services is currently \$1,080.00.

Dividing the estimated \$18,000,000 combined 3-year reserve by \$1,080 per student indicates that DORS will need to provide pre-employment transition services for approximately 16,666 students between FY 17 and FY 19.

The estimated total number of students who will require pre-employment transition services, based on a projected 50 percent increase in applications each year for the next three years, is 11,590. This is 5,076 students shy of the number required to expend the 15 percent reserve fund, and that assumes that each of those 11,590 students will require DORS funding to receive pre-employment transition services.

This suggests that a minimum of \$5.4 million may need to be spent on authorized pre-employment transition services activities to ensure that the 15 percent reserve fund is fully expended.

The opportunity to hire six, full-time, contractual counselors specifically to provide pre-employment transition services will certainly help boost the number of students provided pre-employment transition services. However, these counselors will not be able to manage the number of students required to pay out the reserve fund fully. They will need assistance, either from other VR counselors or, when possible, newly hired staff.

*Recommendations:*

- DORS is committed to serving students with disabilities by providing Pre-Employment Transition Services. The delivery and tracking of these services to Students with Disabilities and eligible Youth with Disabilities will require DORS to update its MOU with each of the local education agencies. The MOU will need to clearly delineate who will be providing and funding the services in order to avoid duplication and/or supplantation of services.
- Consider how to increase the number of counselors dedicated to the provision of pre-employment transition services.
- Consider how to use the 15 percent reserve fund for authorized activities.

(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

The success of DORS consumers is due in many instances and respects to the partnerships DORS has established with Community Rehabilitation Programs which provide a number of direct services throughout the state. Efforts are made throughout the year to ensure that there is a sufficient number of CRPs to provide employment services to consumers statewide.

To assess the need to establish, develop or improve community rehabilitation programs within the state, DORS reviewed the results from (1) a survey of CRP Executive Directors, CRP front line staff and DORS staff as part of a grant received from ICI UMass in 2014/2015, (2) four focus groups related to the ICI UMass project, (3) an Agency survey regarding unmet needs and (4) focus groups conducted through Agency Public Meetings in 2016.

*Methodology: DORS Fee Schedule Review.*

Community Rehabilitation Program Distribution by DORS Region:

- Region 1: 41
- Region 2: 46
- Region 3: 32
- Region 5: 44
- Region 6: 43

*Discussion*

While allocation of CRPs by Region would appear to be robust, there are a number of CPRs that have become relatively inactive and provide little to no services in collaboration with DORS. For Region 1: two providers. For Region 2: six providers. For Region 3: four providers. For Region 5: seven providers and Region 6: ten providers.

*Methodology: ICI Survey of CRPs and DORS Staff.*

Information was requested from CRPs and DORS staff as part of a DORS project to consider a rate adjustment for job coaching for job development and job coaching for job support and to elicit feedback on the current service structure, reporting requirements, and monitoring areas. 51 responses were received from CRPs and 48 from DORS staff.

#### *Discussion*

Information from both CRPs and DORS staff indicates: a desire for additional training and job placement programs for consumers available in all geographic areas, more training available for CRPs to increase skill level of job placement staff (especially related to customized employment and disability information as it pertains to an individual's limitations on a job and in the selection of an appropriate placement), and higher level skills training in IT, administrative, and medical office work. Additionally, there were numerous comments from both CRPs and DORS staff that better collaboration is needed in the areas of communication, especially in returning phone calls and emails.

#### *Methodology: ICI Focus Groups of DORS consumers.*

Four groups were held as part of information gathering for the ICI project. Two groups took place in a rural setting and two in a suburban area. At each location one group was scheduled for the morning and another in the afternoon. A total of two consumers attended each session.

#### *Discussion*

While turnout may have been low, there were similarities in information consumers shared: concerns about waiting for services at both the CRPs and DORS and the amount of actual time staff spent with them in the provision of services. Of particular interest was that consumers who had a clear understanding of the roles and responsibilities (theirs, the DORS counselor, and the provider) responded more favorably to services. Consumers who were satisfied with communication and their DORS counselor reported more optimism regarding their outcome and overall satisfaction.

#### *Methodology: 2016 DORS Survey*

As part of the current Needs Assessment, a survey was made available on line to consumers, advocates, families and CRPs. Responses were received from consumers, parent/guardians, family members and service providers.

#### *Discussion*

An overarching theme was the need for transportation and employment options close to public transportation, especially in rural areas. Additional comments included: a need for services designed for individuals who require a higher level/professional placement than what is typically considered entry level, a need to address the prolonged wait for assistance in job development, and for DORS to work more closely with CRPs who are referring consumers to DORS.

#### *Methodology: 2016 DORS Public Meetings*

Information from CRPs that attended the public meetings indicated a need for employment services for students with mental health needs and a need for funding to develop programs not just fee-for-service. Areas for expansion include CRPs for the Deaf Blind, Deaf and Hard of

Hearing, and Individuals with Blindness. These are also addressed in other areas within the needs assessment.

(3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act .

*Recommendations:*

- Develop additional training for both CRPs and DORS staff in service areas, particularly for job development and services that are new to both entities such as customized employment.
- Continue to enhance collaboration between DORS and CRPs focusing on communication and working relationships.
- Determine if inactive CRPs will begin to provide services to DORS consumers and if not, remove from DORS CPR list.
- Develop resources, including CRPs, for DORS counselors to be able to access employment services for individuals requiring professional level job placement.
- Expand the number of CRPs to provide employment services for specialized populations including Deaf Blind, Deaf and Hard of Hearing, and Individuals with Blindness.

**(k) Annual Estimates. Describe:**

(1) The number of individuals in the State who are eligible for services.

DORS estimates that 25,000 individuals are eligible for services under Title I of the Rehabilitation Act.

**(2) The number of eligible individuals who will receive services under:**

**(A) The VR Program;**

Based on historical data, economic trends, and other factors, the estimated number of individuals who will receive services under the VR program is 18,800. The chart in Section C provides details.

**(B) The Supported Employment Program; and**

Based on historical data, employment trends, and other factors, the estimated number of individuals who will receive services under the Supported Employment Program is 300. Chart in next section provides details

**(C) each priority category, if under an order of selection.**

The following breakdown provides data on the number of individuals receiving services under an Individualized Plan for Employment:

- Title I - 17,900;
- Title VI – 300;
- Category 1, Most Significant: 14,000
- Category 2, Significant: 4,800; and,
- Category 3, Non-Severe: 0.

Category	Title I or Title VI	Estimated Funds	Estimated Number to be Served	Average Cost of Services
Most Significant	Title I	\$30,774,341	14,000	\$2,198
Most Significant	Title VI	\$480,000	300	\$1,600
Significant	Title I	\$13,189,003	4800	\$2,748

(3) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

The number of individuals determined eligible for VR services, but not receiving services due to an order of selection is 3,400. Individuals on the wait list are those determined to be Category 2, Significant Disability.

(4) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

The table below provides information on the number of individuals to be served under the VR Program and the Supported Employment Program, by priority category, and the cost of services.

Category	Title I or Title VI	Estimated Funds	Estimated Number to be Served	Average Cost of Services
Most Significant	Title I	\$30,774,341	14,000	\$2,198
Most Significant	Title VI	\$480,000	300	\$1,600
Significant	Title I	\$13,189,003	4800	\$2,748

(l) State Goals and Priorities. The designated State unit must:

(1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The goals and priorities provided below were jointly developed and agreed to by DORS and the Maryland State Rehabilitation Council. These two entities have also agreed to the revisions of the same.

(2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.

**Goal 1: Assure high-quality integrated employment outcomes for individuals with significant and most significant disabilities in Maryland through the VR program.**

**Objective 1.1 - Provide quality customer service consistent with the Governor's Customer Service Promise.**

**Strategies: DORS will**

1. Ensure staff implement the principles of the Governor's Customer Service Promise.
2. Develop an internal strategy for evaluating customer satisfaction during service delivery in partnership with the state Rehabilitation Council (Needs Assessment Rec. 6).
3. Refine the Quality Assurance Program for VR, as needed, to ensure consistency with required measures under WIOA.

**Performance Measures by September 30, 2018:**

- Provide feedback on the Governor's Customer Service Promise and customer service training.
- Implement a system for consumers to provide feedback on their satisfaction with services at key points during the rehabilitation process.
- Identify and train a Quality Assurance Case Review Team, and complete one District case review for each District during the FY.

**Objective 1.2 - Provide rehabilitation services and pre-employment transition services in partnership with local education agencies that lead to successful outcomes in post-secondary education and employment for students with disabilities.**

**Strategies: DORS will**

1. Ensure that VR counselors and staff work with high school students with disabilities, families, school personnel, business partners, and community partners to help these students prepare for and achieve employment and self-sufficiency.
2. Emphasize and implement transition services, including work-based learning experiences such as Project Search, internships, and summer work-based learning experiences to promote long-term career success and leadership, including expanding transitioning services through federal initiatives, such as the Maryland Workplace Collaborative.
3. Provide Pre-Employment Transition Services as outlined in the Workforce Investment and Opportunity Act (WIOA) including the following services: Job exploration counseling, Work-based learning experiences, Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs, Workplace readiness training, and Instruction on Self-Advocacy for students with disabilities who are 14-21 years old.
4. Provide training and support to DORS transition counselors and pre-employment transition services counselors through the Transition Specialists Group and other meetings, the Transition Conference, and training programs. Training shall help counselors identify and develop tools and resources related to post-secondary education, and best practices in working with families and transitioning students.

**Performance Measures by September 30, 2018:**

- The number of students and youth with disabilities served will match or exceed those served in the previous year, including an increase in the number of students receiving pre-employment transition services compared with the previous year.
- There will be an increase in transitioning youth with disabilities who achieve employment and/or enroll in post-secondary education programs, compared with the previous year.
- The DORS Transition Specialists Group will meet at least semiannually and include staff training on pertinent topics (e.g. pre-employment transition services), and will identify, develop and disseminate tools and resources for transitioning students related to post-secondary education.

**Objective 1.3 - DORS will provide high quality services and outcomes for individuals with disabilities served by the Office of Field Services (OFS).**

**Strategies: DORS will:**

1. Provide high quality comprehensive services to eligible individuals with significant disabilities in accordance with the WIOA and federal Regulations, the Code of Maryland Regulations, and DORS Policy.
2. Collaborate with WTC in assuring consumers with all disabilities receive services offered at WTC in a seamless and timely manner.
3. Strengthen relationships with WIOA partners to improve competitive integrated employment outcomes and reporting on common performance measures for DORS consumers.
4. In conjunction with the Staff Specialist for Community Rehabilitation Programs, OFS management will continue to enhance relationships with community rehabilitation programs.
5. Implement training to define and accurately track credential attainment and measurable skills gain of DORS consumers.

**Performance Measures by September 30, 2018:**

- Meet federal performance standards for timely determination of eligibility and development of the Individualized Plan for Employment.
- Provide staff training related to the new federal and state common measures for WIOA Core Programs.
- OFS will achieve at least 85 percent consumer satisfaction based upon Consumer surveys.
- Consumers will achieve an increase in average hourly earnings from the previous year.
- OFS will achieve 1,892 Competitive Integrated Employment Outcomes.

**Objective 1.4 - DORS will provide high-quality services and outcomes for individuals who are blind, vision impaired and Deaf-Blind (B/VI, D-B).**

Strategies: DORS will

1. Provide high quality comprehensive services to eligible individuals who are blind, vision impaired and Deaf-Blind in accordance with the WIOA and federal Regulations, the Code of Maryland Regulations, the Randolph Shepard Act and DORS Policy.
2. Provide independent living services to older individuals who are blind through (1) direct services of DORS rehabilitation teachers and (2) grants to community organizations.
3. Collaborate with WTC to enhance services to assure that blind, vision impaired and Deaf-Blind consumers have equal access to all programs offered at WTC.
4. Enhance collaboration with businesses and work force partners to include customized training, education, disability awareness, and worksite support to facilitate increased competitive integrated employment opportunities for OBVS consumers.
5. Develop creative, innovative services and programs including Pre-ETS programs to increase employability, skills, advancement and credential attainment.
6. Continue to expand services and outreach to individuals who are deaf-blind and provide technical assistance to staff serving this population (Needs Assessment). Recruit and train Maryland Business Enterprise Program for the Blind vendors, and grow the program strategically.
7. Increase targeted training and develop standardized training for OBVS staff.

**Performance Measures by September 30, 2018:**

- Meet federal performance standards for timely determination of eligibility and development of the Individualized Plan for Employment.
- Provide staff training related to the new federal common performance measures for WIOA programs.
- OBVS will achieve 108 competitive integrated employment outcomes.
- The Business Enterprise Program will recruit/train/license six new managers and establish new vending sites where available.
- OBVS will close 190 ILOB cases successful.
- An increased number of consumers who are blind/vision impaired or Deaf-Blind will be referred to WTC compared to the previous year.
- OBVS will achieve at least 85 percent consumer satisfaction based upon Consumer surveys.
- OBVS will serve more Consumers who are Deaf-Blind as compared to the previous year.

**Objective 1.5 - Provide effective pre-employment transition services and employment services at the Workforce and Technology Center using state-of-the-art interdisciplinary strategies.**

**Strategies: DORS will**

1. Provide high quality comprehensive services to individuals with significant disabilities to facilitate successful competitive integrated employment outcomes.
2. Develop relationships with employers utilizing agency staff who specialize in underserved populations to address service needs; as well as, issues and trends related to the employment of underserved disability populations.
3. Enhance linkages between employers, the business community, DORS Business Services staff, and community partners.
4. Implement strategies for WTC staff to collaborate with OFS and OBVS to enhance consumer services for pre-employment transitioning youth.
5. Provide comprehensive services and awareness to employers to enhance knowledge and understanding of the benefit of Assistive Technology at the worksite.
6. Implement and promote WTC training programs which lead to industry recognized credentials.

**Performance Measures by September 30, 2018:**

- Increase the number of consumers achieving competitive integrated employment outcomes compared to the previous year.
- Increase the number of consumers who are blind/vision impaired and Deaf-Blind who will receive services compared to the previous year.
- Increase the number of consumers who are deaf or hard-of-hearing who will receive services compared to the previous year.
- Increase the number of consumers who are Autistic who will receive services compared to the previous year.
- Increase the number of customized and/or partnership trainings compared to the previous year.

- Participate in the division-wide Business Services Team which will implement collaborative projects between OFS, OBVS, and WTC to enhance the Agency's delivery of effective and efficient consumer services.
- Explore the opportunity with the agency's Staff Specialist–Transition Services to develop pre-employment transition services to occur during the traditional school year.
- Increase the number of worksite services provided, as compared to the previous year.
- Establish a baseline number of available WTC training programs, which lead to an industry recognized credential.

**Objective 1.6 - Enhance collaboration with and services to Maryland private and public employers.**

**Strategies: DORS will:**

1. Continue to have the Business Services Representatives in each region assist with enhancing services to businesses to include recruitment assistance, technical assistance for tax incentives, development of work-based learning opportunities, OJT and customized training, education and disability awareness training.
2. Engage with businesses through the CSAVR National Employment Team (NET) activities, including use of the national Talent Acquisition Portal (TAP).
3. Collaborate with WIOA partners and community rehabilitation programs to leverage business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities.

**Performance Measures by September 30, 2018:**

- The number of services to business will increase as compared to the previous year, and will be documented in the AWARE employer module, as well as through a pilot using the MWE to measure effectiveness in serving employers.
- The number of work-based learning opportunities, including, but not limited to, QUEST, Summer Youth Employment, and On-the-Job Training opportunities will increase as compared to the previous year, and be tracked through the AWARE case management system.
- Minutes of CSAVR NET meetings and the number of consumers enrolled in the Talent Acquisition Portal will confirm activities and progress.
- Monthly reports from Business Service Representatives will show evidence of activities with agency partners.
- Increase, as compared to the previous year, the number of regional employment/job development alliance groups, to include WIOA partners. Conduct one ADA or disability awareness training for employers in each region.

Goal 2: This goal focuses on a non-VR program that is outside of WIOA and not applicable to the WIOA State Plan (Disability Determination Services).

**Goal 3: partner and collaborate with other WIOA programs, private organizations, employers, community groups and individuals to advance the employment and independence of individuals with disabilities.**

**Objective 3.1 - Enhance/expand services for DORS consumers in collaboration with WIOA partners (Needs Assessment Rec. three and seven).**

**Strategies: DORS will**

1. Cross-train staff regarding services available from WIOA partners at the state and local level.
2. Participate in meetings regarding WIOA policy development and partnerships.
3. Participate in local planning meetings regarding service provision and collaboration in AJCs.
4. Strengthen referral procedures to increase engagement of consumers, including Consumers on the DORS waiting list, with WIOA partners.
5. Develop and implement procedures for referring consumers whose cases were recently closed to Maryland Employment Networks.

**Performance Measures by September 30, 2018:**

- Disability awareness training for WIOA partners will be provided.
- A common referral form and release of confidentiality will be developed.
- A baseline number of individuals involved in services provided by WIOA partners will be determined, using AWARE documentation.
- Develop a method for tracking ticket hand-offs to Maryland Employment Networks.

**Objective 3.2 - Assure collaborative relationships are in place with Community Rehabilitation Programs, Community Colleges, Local Education Agencies, MANSEF Schools, and other organizations to enhance effectiveness in service delivery.**

**Strategies:**

1. DORS managers will monitor and address concerns raised by consumers, DORS staff and community partners.
2. DORS will develop and expand collaboration between partners to address unmet consumer needs.

**Performance Measures by September 30, 2018:**

- Four times a year, DORS will survey consumers with open cases regarding their satisfaction with services provided by DORS in collaboration with community partners.
- Managers will follow-up on all concerns raised regarding DORS partners raised via the DORS satisfaction survey process.

**Objective 3.3 - Reevaluate service delivery for individuals in special populations for consistency with priorities within WIOA.**

**Strategies:**

1. Evaluate agency resources which support BHA Evidence-Based Practice Supported Employment (EBPSE) and consumers who receive Assertive Community Treatment (ACT) services.
2. Collaborate with DDA and clarify procedures, including those related to Employment First, to ensure seamless delivery of services.

3. Continue strategic activities that will meet the unique needs of individuals with autism spectrum disorders preparing for employment.
4. The DORS Multi-Cultural workgroup will continue to develop and publicize specialized resources for minority groups.

**Performance Measures by September 30, 2018:**

- Review and update DORS MOU with BHA and DDA for consistency with WIOA requirements.
- Match or exceed the number of Asian and Hispanic consumers served by DORS, compared with the previous year.
- Match or exceed the number of consumers with Autism achieving employment compared with the previous year.

**Objective 3.4 - DORS will provide support to the state Rehabilitation Council (SRC) to maintain and enhance its leadership role in the oversight of VR service delivery in Maryland.**

**Strategies:**

1. DORS will ensure that it works with the state Rehabilitation Council (SRC) in accordance with federal law and regulations and Council By-Laws.
2. Council members will review and comment on the Annual Agency Program Plan, DORS progress in meeting its performance goals, and DORS program accomplishments.

**Performance Measures by September 30, 2018:**

- The Maryland SRC will conduct four quarterly meetings including a meeting during the legislative session in Annapolis.
- The Maryland SRC and DORS will conduct annual public meetings in preparation for developing the VR portion of the Maryland Combined State Plan.
- The Maryland SRC will submit its annual report to the Governor and RSA as required by law.

**Objective 3.5 - Promote and enhance quality independent living outcomes for individuals with disabilities in Maryland through independent living programs.**

**Strategies:**

1. Provide grant support, technical assistance and monitoring to the statewide Independent Living Council (SILC).
2. Manage DORS grants to Centers for Independent Living (CILs), including providing technical assistance and monitoring regarding the IL program, the IL AT program, and fiscal responsibilities.
3. Participate as an IL partner in implementation of the 2017-2019 State Plan for Independent Living.
4. Regional Directors and OBVS Supervisors will conduct an annual meeting with Executive Directors of CILs within their areas to discuss issues of mutual interest.

**Performance Measures by September 30, 2018:**

- Annual reviews of grant performance will be conducted for each CIL with which DORS has a grant, and the statewide Independent Living Council.
- Meeting minutes will confirm DORS staff attendance and participation in quarterly meetings of Maryland IL partners.
- DORS Regional/Program directors will confirm at least annual meetings with CIL Executive Directors.

**Goal 4: Provide Infrastructure to promote and support the accomplishment of the DORS mission.**

**Objective 4.1 - Implement strategies required by the WIOA, consistent with WIOA final regulation, including Title IV, Amendments to the Rehabilitation Act of 1973, and in consultation with the Rehabilitation Services Administration, the Maryland State Rehabilitation Council, other core programs identified within the Combined State Plan, and the Technical Assistance Centers.**

**Strategies:**

1. DORS will collaborate with workforce partners to update and implement the Combined State Plan.
2. Implement MOU/RSAAs with workforce partners required for DORS to fulfill new federal reporting requirements.
3. Identify a technology training team to increase effective use of current technology for case management.
4. Develop strategy for use of Career Index Plus to enhance vocational guidance and counseling for development of the Individualized Plan for Employment.
5. Provide ongoing training to staff regarding the Rehabilitation Act and implications for DORS policy, procedures, and data collection.
6. Leverage electronic communication strategies to gather information from DORS consumers during service delivery as well as post-exit.

**Performance Measures by September 30, 2018:**

- DORS Rehabilitation Services Manuals, publications, and the AWARE case management system will be updated consistent with changes in the Rehabilitation Act.
- Ongoing training will be provided to DORS staff regarding the Rehabilitation Act (e.g. pre-employment transition services, supported employment, limitations on use of subminimum wage, competitive integrated employment criteria, measurable skills gains, and services to employers).
- The DORS section of the Combined State Plan will be updated.
- DORS will request and receive UI wage data from DLLR four times per year, as required for federal reporting.
- Electronic communication procedures for requesting and collecting information from DORS consumers will be implemented.

**Objective 4.2 - Staff training and leadership development programs will be provided to assure that staff maintain current competencies in rehabilitation policy and practice, targeted populations, business services, and administrative/leadership issues.**

**Strategies:**

1. Provide effective VR training for all staff by identifying new approaches to training new hires and to provide ongoing professional development training for all staff.
2. Provide clear and consistent communication to staff regarding policy and performance expectations to increase standardization of policy application and to improve quality of services.
3. Utilize an online/web-based learning management system or platform for training staff to promote continuing education
4. Provide leadership/development activities, including a supervisory training series designed specifically for DORS staff.
5. Continue to support DORS staff obtaining advanced degrees in VR and related fields.
6. DORS staff and Agency partners will be given opportunities to receive internal technical assistance and training regarding WIOA implementation.
7. Conduct at least quarterly trainings of Business Services staff to enhance their skills and develop strategies for engaging businesses.

**Performance Measures by September 30, 2017:**

- The number of online/web-based training opportunities for staff and community partners, as appropriate, will increase as compared to the previous year.
- There will be a minimum of four trainings or meetings specifically for DORS Supervisors.
- The number of staff who enroll in graduate school programs will increase which will improve succession planning.
- Staff will be trained and/or updated on policies and procedures related to WIOA implementation at least quarterly.
- At least one multi-session leadership program will be offered annually.
- Trainings of all staff assigned to business services will be conducted on a quarterly basis; agendas and minutes of Business Services meetings will document training progress.

(3) Ensure that the goals and priorities are based on an analysis of the following areas:

- (A) the most recent comprehensive statewide assessment, including any updates;
- (B) the State's performance under the performance accountability measures of section 116 of WIOA; and
- (C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

The state goals and priorities are based on the analysis of the 2016 comprehensive needs assessment and updates, the state's performance under performance accountability measures, input from the Maryland State Rehabilitation Council, and recommendations from monitoring activities.

(m) Order of Selection. Describe:

(1) Whether the designated State unit will implement and order of selection. If so, describe:

(A) The order to be followed in selecting eligible individuals to be provided VR services.

Individuals shall be placed in priority categories at the time of eligibility determination. Depending upon DORS' resources, the categories shall be closed for services in ascending order beginning with Category III and proceeding to Categories II and I. Services shall be provided only to those individuals in an open category. However, DORS shall continue to plan for and provide services to any individual determined eligible prior to the date on which the Order of Selection category to which the individual has been assigned has been closed, irrespective of the severity of the individual's disability.

DORS staff will be advised via formal issuance when categories are closed or reopened. Consumers shall be taken off the waiting list when resources are available to provide services, based on their application date.

The Order of Selection categories are as follows:

- I. Individuals with Most Significant Disabilities.
- II. Individuals with Significant Disabilities.
- III. Individuals with Non-Severe Disabilities.

Under the order of selection, DORS will continue to emphasize and enhance services to students with disabilities transitioning from school to work.

#### *Description of Priority Categories*

An individual with a most significant disability is an eligible individual:

- a) Who has a severe physical or mental impairment which seriously limits three or more functional capacities such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills, in terms of an employment outcome;
- b) Whose VR can be expected to require multiple VR services: at least two from the main services of guidance and counseling, medical rehabilitation services including technology services, job placement and vocational training; and,
- c) Whose VR is projected to require an extended period of time of at least six months.

An individual with a significant disability is an eligible individual whose severe physical or mental impairment seriously limits one or two functional capacities, and also meets requirements in b and c above.

An individual with a non-severe disability is an eligible individual who does not meet the definition of significant or most significant disability.

#### *(B) The justification for the order*

An order of selection is required under section 101 (a)(5) of the Rehabilitation Act if a rehabilitation agency determines that it is unable to provide services to all eligible individuals who apply for services. With an order of selection, services must first be provided to individuals with the most significant disabilities before they are provided to other eligible individuals.

Due to limited personnel and financial resources, DORS has been unable to provide services to all eligible individuals. Based on projected fiscal and personnel resources, an order of selection

will remain in effect. The Division's order of selection ensures that eligible individuals with the most significant disabilities receive priority.

Update: Between March and August 2017, DORS reduced the number of open cases on counselor caseloads by over 3,600 after communicating with consumers who no longer wished to remain on the wait list or who had not been actively participating in services for over a year and determining that they were no longer interested in services. As a result, for the first time since March 2015, DORS began moving individuals off of the wait list into active case status at the end of September 2017. Between September and December 2017, DORS will roll close to 400 consumers off of the wait list and begin working with them. In January 2018, DORS will reassess the workload and wait list, and then plan for continued roll-off of the wait list. DORS will also investigate methods to increase engagement of DORS consumers, including youth, while they are on the wait list, such as by more proactively providing information and referral services, including timely follow-up on those referrals.

**(C) The service and outcome goals.**

**(D) The time within which these goals may be achieved for individuals in each priority category within the order.; and**

The Division's case management system is designed to assure that individuals with the most significant disabilities are selected for services before all others

Priority Category	Number of individuals to be served	Estimated number of individuals who will exit with employment after receiving services	Estimated number of individuals who will exit without employment after receiving services	Time within which goals are to be achieved	Cost of services
I	14,000	2027	1640	27 months	\$30,774,341
II	4800	507	410	27 months	\$13,189,003
III	0	0	0	0	\$0

**(E) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities.**

Under an order of selection, DORS selects individuals with the most significant disabilities first for the provision of VR services. (Section 101(a)(5)(C) of the Act and 34 CFR 361.36(a)(3)(iv)(A). Individuals who are eligible for VR services and who cannot presently be served under the order of selection are advised that their record will be placed on a waiting list. Eligible individuals are removed from the wait list based on their application date, once resources are available to serve them.

**(2) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.**

DORS has elected not to serve eligible individuals who require specific services or equipment to maintain employment, regardless of the established order of selection.

(n) Goals and Plans for Distribution of title VI Funds.

(1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

Goals and Priorities for the Provision of Supported Employment Services

Supported employment services are provided on a statewide basis through the Title VI, Part B, and also Title I funds. Supported employment is competitive employment or employment in integrated work settings in which individuals are working toward competitive work, with ongoing support services for individuals with the most significant disabilities for whom competitive employment has not traditionally occurred, or for whom competitive employment has been interrupted or intermittent as a result of a significant disability. Fund allocation on a statewide basis ensures an equitable statewide service delivery.

(2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including :

(A) the provision of extended services for a period not to exceed four years; and

DORS will continue to encumber Title VI, Part B funds on a fee-for-service basis. When supported employment services exhaust Title VI, Part B funds, DORS counselors shall be instructed to encumber Title I funds. In that way, individuals in need of supported employment services will continue to be served, even when Title VI, Part B funds are exhausted. DORS counselors will expend Title VI, Part B funds after receipt of documentation confirming the provision of extended services. In compliance with the Rehabilitation Act, as amended, DORS will expend Title I dollars until an extended source of funding has been obtained. The goal of the state's supported employment program is to maintain a system whereby individuals with the most significant disabilities are afforded the opportunity to participate in integrated competitive employment. It is estimated that 4,000 individuals with the most significant disabilities will be served in FY17 in supported employment.

(B) how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

It is estimated that 1,250 transitioning students will be served in supported employment. In accordance with WIOA requirements, DORS will be setting aside 50 percent of its Supported Employment allotment as well as a ten percent match to provide services to youth with disabilities. In addition, DORS will be using state funds through the Governor's Transitioning Youth Initiative. There has been a steady growth in the numbers of individuals with serious and persistent mental illness being served in supported employment.

Update: DORS and the Developmental Disabilities Administration (DDA) collaborate to provide a seamless transition for youth with intellectual disabilities to consider competitive integrated employment as their first option. As collaborative partners in serving youth with the most significant disabilities, DORS is assigning counselor liaisons to for each DDA provider and DDA are updating their cooperative agreement to reflect the roles and responsibilities of both partners at the state and local level, consistent with changes resulting from the WIOA of 2014.

DORS and the Maryland Behavioral Health Administration collaborate in provision of supported employment services to youth and adults with persistent mental illness at approximately 29 community programs throughout the state. Further, DORS and the Maryland Behavioral Health Administration work with the Evidence-Based Practice Center at the University of Maryland to promote the Evidence-Based Supported Employment initiative. The initiative now includes 13 of the community programs statewide that meet Evidence-based Supported Employment fidelity.

DORS supports the use of supported employment models that maximize integration of youth and adults with the most significant disabilities in competitive integrated employment.

DORS and the Maryland Behavioral Health Administration are currently updating the MOU that identifies the roles and responsibilities of both partners at the state and local level. This agreement will further strengthen the collaborative relationship between both agencies and for the first time define the process for serving Youth with serious and persistent mental illness.

The estimated number of individuals with significant disabilities who will achieve a supported employment outcome during FY17 is 775 individuals.

(o) State's Strategies. Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

(1) The methods to be used to expand and improve services to individuals with disabilities.

#### Expanding and Improving Services to Individuals with Disabilities

- DORS will continually analyze office locations, staff deployment, staff positions and responsibilities, in accordance with DORS mission to more effectively serve students and adults with disabilities, and in collaboration with the WIOA partners;
- The 2016 Comprehensive Statewide Needs Assessment will include an assessment and recommendations for expanding and improving services to students and adults with disabilities;
- In collaboration with the WIOA partners, DORS will establish linkages with businesses and employers to include training, customized employment, education and disability awareness, on-site worksite Assistive Technology services, and mentoring/internship activities;
- DORS will continue to enhance relationships with Community Rehabilitation Programs to ensure availability of Community Rehabilitation Program services statewide;
- DORS will continue to expand services and outreach to individuals who are deaf-blind and provide technical assistance to staff and WIOA partners serving this population;
- In collaboration with WIOA partners, DORS will develop relationships with employers and analyze labor trends, to increase opportunities for employment of populations that are unserved or underserved.

(2) How a broad range of Assistive Technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

The DORS, Workforce and Technology Center's Rehabilitation Technology Services program is a national leader in providing worksite evaluation and Assistive Technology services that help people with disabilities get and maintain employment. Through the effective use of Assistive Technology, Rehabilitation Technology Services staff solve problems for people who have limitations in communication, mobility, vision and thinking.

- Rehabilitation Technology Services provides services to DORS consumers and employers in the areas of worksite job accommodations, adaptive driving, Assistive Technology assessment and training, and residential modification consultation. Examples of Assistive Technology provided included hand controls for cars, ramps and stair glides for the home, alternative keyboards and mice or screen magnification and screen readers for computers, and specialized computer-based writing tools. Rehabilitation Technology Services include assistive technology, driver and vehicle services, residential modifications, and worksite evaluations.
- DORS policies and procedures will continue to support statewide Assistive Technology services and devices for consumers at each stage of the rehabilitation process.

(3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

- DORS will continue to provide staff resources and staff training to support Evidence-Based Practice Supported Employment and consumers who receive Assertive Community Treatment services;
- The DORS multi-cultural workgroup will continue to develop and publicize specialized resources for minority groups, focusing on Hispanic and Asian consumers;
- DORS will continue strategic activities to enhance the agency's capacity to meet the unique needs of students and adults with autism spectrum disorders who are preparing for employment;
- DORS will enhance utilization of the Acquired Brain Injury program and continue meetings with Acquired Brain Industry VR Specialists, to include Transitioning Youth Specialists;
- DORS will pilot the Rehabilitation Communication Specialists for the Deaf and Hard of Hearing; and,
- Through the WIOA Jobseeker Advisory Focus Groups and additional means, DORS will seek input of minorities, those with the most significant disabilities, and those who have been unserved or underserved at statewide public meetings and at quarterly state Rehabilitation Council meetings.

(4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

DORS provides VR services and pre-employment transition services in partnership with local education agencies, workforce partners, and businesses that lead to successful outcomes in postsecondary education and employment for students with disabilities.

- DORS will ensure that VR counselors and staff work with high school students (including those in special education, with 504 plans, with severe medical conditions, and those who have a disability for purposes of section 504), families, school personnel and community partners to help students prepare for and achieve employment and self-sufficiency;
- DORS will continue to emphasize and implement evidence-based transition practices, including work-based experiences such as Project Search, internships, and summer employment to promote long-term career success and leadership, including expanding transitioning services at the Workforce and Technology Center (especially for consumers not planning to attend college);
- DORS will implement the provision of Pre-Employment Transition Services as outlined in the Workforce Investment and Opportunity Act, including the following services: Job Exploration Counseling, Work-based learning experiences, Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs, Workplace readiness training, and Instruction on Self-Advocacy for high school students with disabilities who are 14-21 years old;
- The Division will continue to provide training and support to transition counselors through the Transition Specialists Group and other meetings, the Transition Conference, and training programs. Training shall help counselors identify and develop tools and resources related to post-secondary education, and best practices in working with families and transitioning students. The agency will also collaborate with Developmental Disabilities Administration and clarify procedures to ensure seamless transition for individuals receiving Developmental Disabilities Administration assistance.

**(5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.**

- DORS is exploring means of monitoring Community Rehabilitation Programs to assure accountability and quality of services;
- DORS is also exploring payment rates and systems of payment which incentivize outcomes and are fair to providers; and,
- DORS promotes the availability of Community Rehabilitation Programs that serve unserved and underserved populations.

**(6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.**

- DORS will continue to actively participate with the WIOA partners on the Performance Accountability WIOA Workgroup. The collaboration will ensure effective and efficient implementation of new common performance accountability measures in Maryland, identification of best presentation of WIOA performance reports for state and Local Areas, development of recommendations for additional measures, and negotiation of levels of performance/adjustment factors;
- DORS and the other WIOA Core Programs will establish base-line or benchmarking data in the first year of data collection for the new Common Performance measures;
- In order to secure wage data for DORS consumers working in other states, DORS will explore strategies with DLLR to access Wage Record Interchange System wage reporting system;

- DORS will review data sharing agreement with the WIOA partners as described within this plan for possible revisions to have better access to wage data; and,
- federal employment data is available through FEDES, which is operated by the University of Baltimore, Jacob France Institute under contract with DLLR and the USDOL. DORS will work with WIOA partners to review existing agreement and take appropriate actions to ensure access to federal wage records.

**(7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.**

- DORS is collaborating with its WIOA partners, including those within the AJCs throughout the state, on office space. As leases expire, DORS will look for opportunities to expand the co-location of DORS and other WIOA partners, in an effort to assist in better serving individuals with disabilities;
- DORS will collaborate with WIOA partners to offer cross-training on disability awareness, customized employment, Assistive Technology, and other disability-specific topics;
- DORS Business Service members will collaborate with WIOA partner Business Service teams to leverage business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities; and,
- DORS will coordinate with WIOA partners, including WIOA Business Services Team and AJCs in recruitment events and job fairs.

**(8) How the agency's strategies will be used to:**

- (A) achieve goals and priorities by the State, consistent with the comprehensive needs assessment;
- (B) support innovation and expansion activities; and
- (C) overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

DORS has developed a Strategic Plan for 2014-2017. In order to achieve the best employment outcomes for students and adults with significant disabilities, DORS is committed to assuring a responsive, accountable agency structured to meet consumer needs, to support staff, to develop leadership, to enhance partnerships, and to take full advantage of the technology and resources of today and tomorrow. Strategic goals of the plan include the following:

- Goal 1. Organization structure evolves in supporting the success of consumers in a manner that reflects statutory and regulatory requirements, respect for consumer, and equitable working conditions for staff;
- Goal 2. Information technology further enhances administration of the VR and Supported Employment programs, provisions of services, and achievement of employment for students and adults with significant disabilities;
- Goal 3. partnerships with Community Rehabilitation Providers are improved through enhanced monitoring practices and payment systems and rates; and,
- Goal 4. Future agency leaders are recognized and developed.

- (p) Evaluation and Reports of Progress: VR and Supported Employment Goals. Describe:
- (1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed PY were achieved. The evaluation must:
- (A) Identify the strategies that contributed to the achievement of the goals.
- (B) Describe the factors that impeded the achievement of the goals and priorities.

**Goal 1: Assure high-quality employment outcomes for individuals with significant and most significant disabilities in Maryland through the VR program.**

**Objective 1.1 - Provide quality customer service consistent with the Governor's Customer Service Promise.**

**Strategies:**

4. Ensure staff implement the principles of the Governor's Customer Service Promise.
5. Develop an internal strategy for evaluating customer satisfaction during service delivery in partnership with the state Rehabilitation Council (Needs Assessment Rec. 6).
6. Refine the Quality Assurance Program for VR, as needed, to ensure consistency with required measures under WIOA.

**Performance Measures by September 30, 2017:**

- Provide information on the Governor's Customer Service Promise and customer service training.

*During FY 17, DORS provided administrative instruction for staff regarding the Governor's Customer Service Promise, and posted this promise on the DORS website. All DORS staff participated in Customer Service Training, and included links to the Governor's 3-question Customer Satisfaction Survey in their email signatures.*
- Develop a system for consumers to provide feedback on their satisfaction with services at key points during the rehabilitation process.

*OBVS contracts with the University of Maryland to conduct satisfaction surveys to DORS consumers with closed cases on a quarterly basis. Surveys are send by mail with follow up phone calls for non-respondents. Similarly, DORS HQ sends surveys to DORS consumers with closed cases on a monthly basis. During FY 17, the DORS Quality Assurance Program Manager has been collaborating with the Maryland State Rehabilitation Council on a satisfaction survey to send to OBVS and OFS consumers with open cases. DORS anticipates beginning to use this survey during 2018.*

- Recommendations for updating the QA Program will be provided to Executive Staff.

*DORS updates to the QA program were initially delayed, pending completion of the RSA monitoring and technical assistance process which began April 2017. RSA's draft report was received in September 2017.*

**Objective 1.2 - Provide rehabilitation services and pre-employment transition services in partnership with local education agencies that lead to successful outcomes in post-secondary education and employment for students with disabilities.**

**Strategies: DORS will**

1. Ensure that VR counselors and staff work with high school students with disabilities, families, school personnel and community partners to help these students prepare for and achieve employment and self-sufficiency.

2. Emphasize and implement transition services, including work-based learning experiences such as Project Search, internships, and summer employment to promote long-term career success and leadership, including expanding transitioning services at the Workforce and Technology Center.
3. Provide Pre-Employment Transition Services as outlined in the Workforce Investment and Opportunity Act (WIOA) including the following services: Job exploration counseling, Work-based learning experiences, Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs, Workplace readiness training, and Instruction on self-advocacy for students with disabilities who are 14-21 years old.
4. Provide training and support to DORS transition counselors through the Transition Specialists Group and other meetings, the Transition Conference and training programs. Training shall help counselors identify and develop tools and resources related to post-secondary education, and best practices in working with families and transitioning students.

**Performance Measures by September 30, 2017:**

- The number of students and youth with disabilities served will match or exceed those served in the previous year, including an increase in the number of students receiving pre-employment transition services compared with the previous year.

*During FY 17, DORS saw a 7.6 percent increase in the numbers of transition youth served between FY 16 (9,491) to FY 17 (10,216). In FY 16, 9,121 students received traditional VR and/or pre-employment transition services (Pre-ETS), and 370 other students with disabilities received only pre-employment transition services (Pre-ETS), prior to applying for VR services. By contrast, in FY 17, 8,306 students received traditional VR and/or Pre-ETS, while 1,910 other students with disabilities received only Pre-ETS prior to applying for VR services. Overall, these figures reflect the Division's new emphasis on making pre-employment transition services available for students with disabilities statewide.*

- There will be an increase in transitioning youth with disabilities who achieve employment compared with the previous year.

*DORS saw a decrease in the number of students who achieved employment outcomes from 849 in FY 16 to 590 in FY 17. This decrease was partially due to the new emphasis on providing pre-employment transition services to students with disabilities and partially because DORS discontinued assisting individuals to obtain employment in jobs created for the purpose of employing individuals with disabilities because they do not fit the definition of "integrated" employment.*

- Funding will be provided to support leadership programs for youth with disabilities.

*During FY17, DORS contributed \$17,130.00 to support the Maryland Youth Leadership Forum for youth with disabilities.*

- The DORS Transition Specialists Group will meet at least semiannually and include staff training on pertinent topics (e.g. pre-employment transition services), and will identify, develop and disseminate tools and resources for transitioning students related to post-secondary education.

*In FY 17, the DORS Transition Specialists Group met on four occasions in person and participated in two webinars. Targeted training provided counselors with information on managing cases of “potentially eligible” students in the AWARE case management system, coordinating and providing Pre-Employment Transition Services (Pre-ETS), collaborating with local education agencies, AJCs, and the Behavioral Health Administration. DORS developed a Pre-ETS Fact Sheet, and updated transition-related information on the DORS website and in publications to include the availability of pre-employment transition services for students in post-secondary education. DORS also collaborated on the Interagency Transitions Council for Youth with Disabilities (IATC) to provide a statewide transition conference for professionals working with transition youth.*

**Objective 1.3 - DORS will provide high quality services and outcomes for individuals with disabilities served by the Office of Field Services (OFS).**

**Strategies: DORS will**

1. Provide high quality comprehensive services to eligible individuals with significant disabilities in keeping with the WIOA and federal Regulations, the Code of Maryland regulation, and DORS Policy.
2. Collaborate with WTC in assuring consumers with all disabilities receive services offered at WTC in a seamless and timely manner.
3. Strengthen relationships with WIOA partners to improve employment outcomes and reporting on common performance measures for DORS consumers (Needs Assessment Rec. 1).
4. In conjunction with the Staff Specialist for Community Rehabilitation Programs, OFS management will continue to enhance relationships with community rehabilitation programs.

**Performance Measures by September 30, 2017:**

- Meet federal performance standards for timely determination of eligibility and development of the Individualized Plan for Employment.  
*During FY 17, OFS achieved 98 percent eligibility determination timeliness compliance compared to 93 percent in FY 16, and 91 percent Individualized Plan for Employment development timeliness compliance compared to 81 percent in FY 16.*
- Provide staff training related to the new federal and state common measures for CORE WIOA Core Programs.  
*DORS provided and/or supported two learning events pertaining to WIOA state and federal common performance measures.*
- OFS will achieve at least 85 percent consumer satisfaction.  
*93 percent overall customer satisfaction achieved.*
- OFS will achieve 1,910 employment outcomes.

*In FY 17 1,853 employment outcomes achieved (97 percent of goal). Employment objective slightly missed due primarily to federal guidance on the definition of “competitive integrated employment”, which has resulted in DORS no longer claiming successful outcomes for consumers employed in positions which are created for the employment of individuals with disabilities and are, therefore, not typically available in the community.*

- Consumers will achieve an increase in average hourly earnings from the previous year.  
*In FY 17 average hourly earnings were \$12.32 (FY 16: \$11.19).*
- Develop a strategy for measuring the rate of credential attainment and measurable skills gain of DORS consumers.  
*Guidance and instruction has been provided to staff for completing and updating educational goal records in AWARE, including detailed reference materials. Training on documenting Measurable Skills Gains and Credential Attainment will continue during 2018.*

**Objective 1.4 - DORS will provide high-quality services and outcomes for individuals who are blind, vision impaired and Deaf-Blind (B/VI, D-B).**

Strategies: DORS will

2. Provide high quality comprehensive services to eligible individuals who are blind, vision impaired and Deaf-Blind in keeping with the WIOA and federal Regulations, the Code of Maryland regulation, the Randolph Shepard Act and DORS Policy.
3. Provide independent living services to older individuals who are blind through (1) direct services of DORS rehabilitation teachers and (2) grants to community organizations.
4. Collaborate with WTC in assuring that Blind, Visually Impaired and Deaf-Blind consumers have equal access to all programs available at WTC.
5. Enhance linkages with businesses and employers to include customized training, education and disability awareness, work site Assistive Technology services and mentoring/internship activities, raising awareness and expectations for competitive employment for consumers who are blind/visually impaired and Deaf-Blind.
6. Continue to expand services and outreach to individuals who are deaf-blind and provide technical assistance to staff serving this population (Needs Assessment Rec. 12).
7. Recruit and train Maryland Business Enterprise Program for the Blind vendors.

**Performance Measures by September 30, 2017:**

- Meet federal performance standards for timely determination of eligibility and development of the Individualized Plan for Employment.  
*During FY 17, OBVS achieved 92 percent eligibility determination timeliness compliance compared to 90 percent in FY 16, and 74 percent Individualized Plan for Employment development timeliness compliance compared to 69 percent in FY 16. OBVS will continue to emphasize improvement in both areas during FY 18.*
- Provide staff training related to the new federal and state common measures for CORE WIOA Core Programs.  
*DORS provided and/or supported two learning events regarding WIOA state and federal common measures.*
- OBVS will achieve 108 employment outcomes.  
*In FY 17 51 employment outcomes achieved. Employment objective missed due primarily to federal guidance on the definition of “competitive integrated employment”, which has resulted in DORS no longer claiming successful “homemaker” outcomes or other outcomes for consumers obtaining jobs in positions created for the employment of individuals with disabilities and are, therefore, not typically available in the community.*
- The Business Enterprise Program will recruit/train/license four new managers and establish new vending sites where available.

*In FY17, the Maryland Business Enterprise Program for the Blind accepted, trained, and licensed six new vendors. All six received their initial six-month provisional license and five have bid on and have been awarded a facility. The other newly licensed vendor, who has not chosen a facility on which to bid, is operating a facility that temporarily has no manager, at the request of the program and is being paid as a staff. The BEP continues to grow the program and locate new facilities that will provide a livable income for Maryland Vendors. During FY17, three new facilities were opened: One manned Micro-market (Concession store with a kiosk open 24 hours a day); one large cafeteria with a teaming partner at National Archives and Records Administration; and one large military contract with a teaming partner at the House of Five Hats.*

- OBVS will close 190 ILOB cases successful.

*OBVS closed 184 ILOB cases successfully by DORS teachers for the blind during FY 17. In addition, OBVS served 731 consumers in ILOB this year with the assistance of the two sub-grantees, Blind Industries and Services of Maryland and Metier.*

- An increased number of consumers who are blind/vision impaired or deaf-blind will be referred to the WTC compared with the previous year.  
*386 (348 Blind or Low Vision and 38 Deaf-Blind) in FY17; down 1.5 percent from 392 in FY16 (353 Blind or Low Vision and 39 Deaf-Blindness)*
- Achieve a consumer satisfaction rate of 85 percent.

*OBVS receives quarterly reports on customer satisfaction from the University of Maryland, which is contracted to conduct consumer satisfaction surveys for consumer's whose cases have been closed. An average of the overall satisfaction rating for the four quarters of FY 17 is 74.25 percent. This is below target and may reflect the changes in policies as a result of WIOA related to Ability One contracts and Homemaker goals.*

- Develop a strategy for measuring the rate of credential attainment and measurable skills gain of DORS consumers.

*Guidance and instruction has been provided to staff for completing and updating educational goal records in AWARE, including detailed reference materials. Training on documenting Measurable Skills Gains and Credential Attainment will continue during 2018.*

- Reconvene a DORS Deaf-Blind Work Group beginning in Summer 2017.

The Deaf-Blind Work Group has been reconvened. The Work Group will meet three-to-four times a year. The Work Group met twice in FY17. The next meeting is scheduled for January 11, 2018.

### ***Objective 1.5***

**Provide effective pre-employment transition services and employment services at the Workforce and Technology Center using state-of-the-art interdisciplinary strategies.**

**Strategies:** DORS will

1. Provide high quality comprehensive services to individuals with significant disabilities to facilitate successful employment outcomes.
2. Develop relationships with employers utilizing agency staff who specialize in underserved populations to address service needs; as well as, issues and trends related to the employment of underserved disability populations.

3. Enhance linkages between employers, the business community, DORS Business Services staff, and community partners.
4. Implement strategies for WTC staff to collaborate with OFS and OBVS to enhance consumer services, increase referrals to WTC, develop pre-employment transition services, and contribute to successful employment outcomes.
5. Provide comprehensive services and awareness to employers to enhance knowledge and understanding of the benefit of Assistive Technology at the worksite.

**Performance Measures by September 30, 2017:**

- Increase the number of consumers achieving employment outcomes compared to the previous year.

*370 consumers achieving employment; down 33 percent from FY17 (556). Decline due to extended medical leave of staff and multiple resignations.*

- Increase the number of consumers in special populations (blind, deaf, Deaf-Blind, Autism) who will receive services compared to the previous year.

*854 individuals served in FY17; up two percent from FY16 (840)*

- Increase the number of customized and/or partnership trainings compared to the previous year.

*Customized and partnership trainings increased from 16 in FY16 to 19 in FY17. Training included: Caliber Collision, Heritage Toyota Service Center and Body Shop, Little Bears Den, Lyles Cleaning, Montessori Luna Bilingual Daycare, Safelite AutoGlass, two Starbucks trainings, Tulkoff Food Products, CCBC Auto Detailing I, CCBC Auto Detailing II, CCBC Auto Refinishing, CCBC Childcare, CCBC PAWS, two CCBC Security training programs, and three CCBC Warehouse trainings.*

- Participate in a division-wide Business Services work group which will develop a collaborative effort between OFS, OBVS, and WTC to enhance the Agency's delivery of effective and efficient consumer services.

*The DORS Business Relations Branch worked closely with WTC's Career and Technology Training Services and Employment Services to coordinate services to employers that enhance services and employment outcomes for WTC consumers. A RA "Think-Tank Team" including staff from DORS, WTC, the DLLR, and other Maryland Workforce partners, business representatives and stakeholders has been developed. The WTC has expanded partnership collaboration with Starbucks yielding additional training classes that occurred in FY17. Six new customized training programs for individuals with community-based businesses/employers occurred this year. A CVS customized training program was developed with training beginning in FY18.*

- Explore the opportunity with the agency's Staff Specialist–Transition Services to develop pre-employment transition services to occur during the traditional school year.

*WTC Leadership met with the Staff Specialist–Transition Services to discuss a plan of action regarding the development of pre-employment transition services during the school year. The plan included meeting with Baltimore County Transition staff to*

*implement a pilot program beginning September 2017. However, plans were halted due to the loss of the contractual position identified to run this pilot.*

- Increase the number of worksite consumers served compared to the previous year.

*65 individuals served in FY17; down 24 percent from FY16 (86). Decline due to decreased referrals.*

**Objective 1.6 - Enhance collaboration with and services to Maryland private and public employers.**

**Strategies:**

1. The Business Services Representatives in each region will assist with enhancing services to businesses to include recruitment assistance, technical assistance for tax incentives, development of work-based learning opportunities, OJT and customized training, education and disability awareness training.
2. The Business Relations Branch will assist counselors and consumers to use Labor Market Information when identifying appropriate employment goals (Needs Assessment Rec. 8).
3. Conduct at least quarterly trainings of Business Services Staff to enhance their skills and develop strategies for engaging businesses.
4. Engage with businesses through the CSAVR National Employment Team (NET) activities, including use of the national Talent Acquisition Portal (TAP).
5. Collaborate with WIOA partners and community rehabilitation programs to leverage business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities.

**Performance Measures by September 30, 2017:**

- The number of services to business will increase and will be documented in the AWARE employer module, as well as through a pilot using the MWE to measure effectiveness in serving employers.  
*376 business services were documented in AWARE, 98 more than FY 16.*
- The number of work-based learning opportunities, including QUEST, and On-the-Job Training opportunities will increase and be tracked through the AWARE case management system.

*61 QUEST internship opportunities were made available, and 34 individuals completed QUEST internships. The number of opportunities decreased; however, nine intern host agencies offered three month extensions to their interns in lieu of advertising for a new intern. This allowed those individuals to gain additional skills and six months of experience, which is the minimum requirement for many entry level state positions. In addition, 33 work-based learning activities and 26 on-the-job training (OJT) activities were documented in AWARE.*

- Develop strategy for use of Career Index Plus to enhance vocational guidance and counseling for development of the Individualized Plan for Employment.

*During FY 17, all Business Services Representatives (BSRs) participated in Career Index Plus (CIP) webinars offered through the Workforce Innovation Technical Assistance Center (WINTAC), and WINTAC presented on the CIP at the DORS annual conference. OBVS has incorporated the use of Career Index Plus into the curriculum and activities of the Virtual Job Club, and several counselors and career assessment staff have been*

*practicing with the tool. DORS has arranged for additional technical assistance in FY 18 related to using the Career Index Plus for DORS staff.*

- Trainings of all staff assigned to business services will be conducted on a quarterly basis; agendas and minutes of Business Services meetings will document training progress.  
*Training topics included: AWARE documentation; WIOA Common Performance Measures; Competitive Integrated Employment; ADA Title I; Virtru email encryption to protect personally identifiable information (resumes); and on the job training. Business services staff also completed ADA training through the Mid-Atlantic ADA Center and became members of the ADA Leadership Network of trainers. Additionally, business services staff attended the following: Raising the Bar workforce conference; JD-VRTAC Conference: Meeting Employer Demand in a Job-Driven Economy; and the ADA Update Conference.*
- Minutes of CSAVR NET meetings and the number of consumers enrolled in the Talent Acquisition Portal will confirm activities and progress.  
*The NET Point of Contact participates in NET conference calls, webinars, and the Employment Committee meetings at the Fall and Spring CSAVR meetings. Several national employers have connected through the NET and information on the TAP was disseminated regularly. There are 54 candidates in TAP currently. That number should increase as additional employers begin streaming Maryland opportunities into the portal.*
- Monthly reports from Business Service Representatives will show evidence of activities with partners.

*Business Services Representatives (BSRs) worked in the AJCs (AJCs) in their regions on regular schedules to connect with other business services staff and employers, as well as to connect job seekers to those businesses. BSRs also partnered on various recruitment activities, including employer-specific and industry job fairs at the AJCs. Several job developer/employment alliance groups have been engaged in various areas of the state (Lower and Upper Shore, Baltimore area, Hagerstown, Carroll County). During monthly alliance group meetings, BSRs, community rehabilitation program staff and other workforce partners collaborate and share job leads and receive training on subjects of mutual interest (resumes, passing online assessments, benefits, ADA, etc.) from guest speakers, including employers. DORS looks forward to these networking groups expand to other areas of the state during 2018.*

Goal 2: This goal focuses on a non-VR program that is outside of WIOA and not applicable to the WIOA State Plan (Disability Determination Services).

**Goal 3: partner and collaborate with other WIOA programs, private organizations, employers, community groups and individuals to advance the employment and independence of individuals with disabilities.**

**Objective 3.1** - Enhance/expand services for DORS consumers in collaboration with WIOA partners (Needs Assessment Rec. three and seven).

**Strategies:**

1. Cross-train staff regarding services available from WIOA partners.
2. Participate in meetings regarding WIOA policy development and partnerships.
3. Participate in local planning meetings regarding MOU development.

4. Strengthen procedures for referring consumers to WIOA partners, including those on the DORS waiting list.

### **Performance Measures by September 30, 2017:**

- Disability awareness training for WIOA partners will be provided.  
*During FY 17, the DORS Workforce and Technology Center (WTC) Rehabilitation Technology Services (RTS) staff worked collaboratively with Maryland TAP and the AJCs to ensure equal access of equipment to all individuals with disabilities served by the AJCs. WTC RTS also continued to work with two- and four-year higher education institutions to provide disability awareness regarding Autism. In addition, DORS sponsored training on "Effectively Communicating with People who have Hearing Loss and/or Vision Loss by 64 representatives from WIOA partner programs.*
- A common referral form and release of confidentiality will be developed.  
*WIOA partners completed a draft common referral form which is still under review.*
- A baseline number of individuals involved in services provided by WIOA partners will be determined, using AWARE documentation.  
*1,703 DORS consumers served during FY 17 have been involved with WIOA partners, per AWARE documentation.*

**Objective 3.2 - Assure collaborative relationships are in place with Community Rehabilitation Programs, Community Colleges, Local Education Agencies, MANSEF Schools, and other organizations to enhance effectiveness in service delivery.**

#### **Strategies:**

1. DORS managers will monitor and address concerns raised by consumers, DORS staff and community partners.
2. DORS will develop and expand collaboration between partners to address unmet consumer needs.

#### **Performance Measures:**

- Strong partner relationships will be reflected in positive customer feedback as documented in customer satisfaction surveys.  
*During FY 17, DORS surveyed consumers on the DORS Waiting List to determine whether they continued to be interested in DORS services and whether they had been connected with other workforce partners, and received 810 responses. 459 of respondents (57 percent) reported receiving services through an AJC and/or the MWE, receiving funding through the Department of Social Services and/or Social Security, and/or taking classes, and approximately 25 percent reported that their DORS counselor provided them information about these services. During 2018, DORS will continue to focus on partnering with other workforce programs so that more consumers may participate in those services.*
- Consumers will be informed and active participants as demonstrated through customer satisfaction survey results.

*Quarterly customer satisfaction surveys found that 95 percent of OFS consumers were satisfied with their involvement in decision-making. 79 percent of OBVS consumers reported satisfaction with their decision-making. OBVS consumer satisfaction with decision-making appears to be reduced in areas where consumers have fewer service options from which to choose. OBVS conducts quarterly training every year, as well as*

*other training sessions, to expose staff to community vendors, services, and resources and to ensure that consumers are provided comprehensive information regarding resource availability.*

**Objective 3.3 - Reevaluate service delivery for individuals in special populations for consistency with priorities within WIOA.**

**Strategies:**

1. Evaluate agency resources which support BHA Evidence-Based Practice Supported Employment (EBPSE) and consumers who receive Assertive Community Treatment (ACT) services.
2. Collaborate with DDA and clarify procedures, including those related to Employment First, to ensure seamless delivery of services.
3. Continue strategic activities that will meet the unique needs of individuals with autism spectrum disorders preparing for employment.
4. Continue strategic activities that will meet the unique needs of individual with acquired brain injury, including training for transitioning youth VR specialists and pre-employment transition counselors.
5. Pilot the Rehabilitation Communication Specialists (RCS) for the Deaf and Hard of Hearing in at least one region (Needs Assessment Rec. 11).
6. The DORS Multi-Cultural workgroup will continue to develop and publicize specialized resources for minority groups, focusing on Hispanic and Asian consumers (Needs Assessment Rec. 9).

**Performance Measures by September 30, 2017:**

- Review and update DORS MOU with BHA and DDA for consistency with WIOA requirements.

*During FY17, DORS and the Maryland Behavioral Health Administration (BHA) have been updating the MOU to meet the requirements under WIOA, specifically, the process for serving youth with serious and persistent mental illness. This agreement, which identifies the roles and responsibilities of both partners at the state and local level, will further strengthen the collaborative relationship between both agencies. Also, throughout FY17, DORS and DDA have been actively updating their cooperative agreement to reflect collaborative practices and changes related to WIOA. DORS anticipates finalizing both cooperative agreements in 2018.*

- Match or exceed the number of Asian and Hispanic consumers served by DORS, compared with the previous year.

*675 Asian individuals and 774 Hispanic individuals served; up one percent from the previous year of 668 (Asian) and two percent from the previous year of 761 (Hispanic).*

- Match or exceed the number of ABI consumers achieving employment compared with the previous year.

*92 individuals with acquired brain injury achieved employment; down two percent from the previous year (94).*

- Match or exceed the number of consumers with Autism achieving employment compared with the previous year.

*190 individuals with autism achieved employment (2,470 total served); down 12 percent from the previous year (217 achieved employment, 2,398 total served). However, the*

*overall number of individuals with Autism served during FY 17 increased three percent to 2,470, as compared to 2,398 in FY 16.*

- Track and assess RCS pilot outcomes.

*DORS provided funding for Rehabilitation Communication Specialist (RCS) services for 45 consumers during FY17, at a total cost of \$47,700, and 22 consumers achieved successful employment outcomes during FY 17. Of the four individuals who received RCS services when the pilot first began during FY 16, all four are successfully employed. Due to the success of this pilot, DORS has committed to expanding these services to additional locations during FY 18.*

**Objective 3.4 - DORS will provide support to the state Rehabilitation Council (SRC) to maintain and enhance its leadership role in the oversight of VR service delivery in Maryland.**

**Strategies:**

1. DORS will ensure that it works with the state Rehabilitation Council (SRC) in accordance with federal law and regulations and Council By-Laws.
2. Council members will review and comment on the Annual Agency Program Plan, DORS progress in meeting its performance goals, and DORS program accomplishments.

**Performance Measures by September 30, 2017:**

- The Maryland SRC will conduct four quarterly meetings including a meeting during the legislative session in Annapolis.  
*During FY 17, the Maryland SRC met on February, 24, 2017, May 10, 2017, August 24, 2017, and September 13, 2017. In addition, the SRC held its annual Legislative Day on February 24, 2017.*
- The Maryland SRC and DORS will conduct annual public meetings in preparation for developing the VR portion of the Maryland Combined State Plan.  
*DORS held two public meetings in 2017. Both meetings were held at the DORS' Workforce and Technology Center and offered an option to call-in to the meetings. These meetings were held on June 7th, at 10:00 AM and on June 15th, at 3:00 PM. Approximately 21 individuals participated in these meetings.*
- The Maryland SRC will submit its annual report to the Governor and RSA as required by law.

*The MSRC 2015 Annual Report was submitted by December 31, 2015 as required.*

**Objective 3.5 - Promote and enhance quality independent living outcomes for individuals with disabilities in Maryland through independent living programs.**

**Strategies:**

1. Provide grant support, technical assistance and monitoring to the statewide Independent Living Council (SILC).
2. Manage DORS grants to Centers for Independent Living (CILs), including providing technical assistance and monitoring regarding the IL program, the IL AT program, and fiscal responsibilities.
3. Participate as an IL partner in implementation of the 2017-2019 State Plan for Independent Living.

4. Regional Directors and OBVS Supervisors will conduct an annual meeting with Executive Directors of CILs within their areas to discuss issues of mutual interest.

#### **Performance Measures by September 30, 2017:**

- Annual reviews of grant performance will be conducted for each CIL with which DORS has a grant, and the statewide Independent Living Council.  
*DORS scheduled all CIL reviews for FY17. Due to unforeseen situations, only half were conducted and rescheduling has continued for the early months of 2018.*
- Meeting minutes will confirm DORS staff attendance and participation in quarterly meetings of Maryland IL partners.  
*DORS continues to support and attend all quarterly IL partner meetings.*
- DORS Regional/Program directors will confirm at least annual meetings with CIL Executive Directors.  
*Regional Program Managers meet annually with CIL directors to address various concerns and interests related to consumer services.*

#### **Goal 4: Provide Infrastructure to promote and support the accomplishment of the DORS mission.**

**Objective 4.1 - Complete year three activities that support the goals and objectives of the DORS 2014-2017 Strategic Plan, in the areas of organizational structure, information technology, succession planning, and community partners.**

##### **Strategies:**

1. Assign appropriate staff to work groups to see that strategic planning activities are carried out.
2. Review Strategic Plan for possible revisions, as necessary.
3. Analyze work requirements resulting from WIOA changes and consider staffing needs. (Needs Assessment Rec. 2.)
4. Increase the capacity of DORS to utilize the 15 percent reserve fund for provision of pre-employment transition services statewide (Needs Assessment Rec. 4.)
5. Assure that progress is made through presentations to the Executive Staff.

#### **Performance Measures by September 30, 2017:**

- DORS staffing needs will be evaluated.  
*Staffing needs are evaluated on a regular basis, especially when a position becomes vacant, to determine the most effective and equitable utilization of human resources.*
- DORS capacity to provide pre-employment transition services and to document related expenditures will increase.  
*Previously, DORS was able to report through the AWARE case management system only on services paid for via the DORS authorization process. During FY 17, the AWARE case management system was updated to collect and report on pre-employment transition services provided by DORS via MOU with partnering programs (e.g. Summer*

*Youth Employment Programs). DORS also expanded its capacity to provide pre-employment transition services by continuing to receive, review, and approve proposals from community partners seeking to these services.*

- Recommendations will be made to Executive Staff for updating the DORS Strategic Plan for 2018-2020.

*Recommendations pending receipt of finalized RSA monitoring and technical assistance report.*

**Objective 4.2 - Staff training and leadership development programs will be provided to assure that staff maintain current competencies in rehabilitation policy and practice, targeted populations, and administrative/leadership issues.**

**Strategies:**

1. Provide effective VR training for all staff, including but not limited to increasing the earning capacity of consumers, utilizing technology, addressing barriers to employment for targeted populations, and general professional development. (Needs Assessment Rec. 5.)
2. Continue to utilize online/web-based platforms for training staff.
3. Provide leadership development activities for staff.
4. Continue training staff on implementation of WIOA.
5. Community and WIOA partners will be included in DORS training and meetings as appropriate.

**Performance Measures by September 30, 2017:**

- Staff training in rehabilitation topics, including the needs of targeted populations, will be available monthly, and will include community and WIOA partners as appropriate.  
*Rehabilitation training topics were available to staff on a monthly basis. DORS sponsored and/or supported 194 total training opportunities for staff. Community and WIOA partners participated in five of these opportunities. Training topics included: Blindness, Deaf-Blind, Deaf/Hard of Hearing, Autism, Psychiatric, Student/Youth, Acquired Brain Injury, New Staff training, WIOA, Leadership, and general Professional Development.*
- The number of online/web-based training opportunities for staff and community partners, as appropriate, will increase as compared to the previous year.  
*DORS supported a total of 57 staff participating in 43 online/web based training opportunities. These opportunities included both DORS sponsored training, and training provided by external organizations.*
- There will be a minimum of four trainings or meetings specifically for DORS Supervisors.  
*DORS provided two trainings specifically for supervisors. The Supervisors and Managers within each Office meet on a regular basis to discuss updates, changes, etc. However, these meetings are not tracked by the Staff Development office.*
- Staff will be trained and/or updated on policies and procedures related to WIOA implementation at least quarterly.  
*DORS provided and/or supported seven trainings related to WIOA. There was a training at least quarterly.*

- At least one multi-session leadership program will be offered annually.

*DORS provided two multi-session leadership opportunities: Emerging Leaders, and Leadership Exploration and Agency Programs. DORS supported staff participation in two externally sponsored leadership programs: The National Rehabilitation Leadership Institute (sponsored by Interwork Institute of San Diego state University), and Supervisory Boot Camp (sponsored by MD Works Inc.).*

**Objective 4.4 - Implement changes required by the WIOA, consistent with WIOA final regulation, including Title IV, Amendments to the Rehabilitation Act of 1973, and in consultation with the Rehabilitation Services Administration, the Maryland State Rehabilitation Council, other core programs identified within the Combined State Plan, and the Technical Assistance Centers.**

**Strategies:**

1. Establish work groups to review the final regulation and recommend changes in policy and practice accordingly.
2. Provide training to staff on changes in the Rehabilitation Act and implications for DORS policy and procedures.
3. Develop MOU/RSAAs with workforce partners required for DORS to fulfill new federal reporting requirements.
- 4.

**Performance Measures by September 30, 2017:**

- DORS Rehabilitation Services Manuals, publications, and the AWARE case management system will be updated consistent with changes in the Rehabilitation Act.

*The AWARE case management system was updated four times during this FY in compliance with new federal requirements to submit case service data to RSA on a quarterly basis for open and closed cases. With each AWARE update, the Rehabilitation Service Manuals were updated with direction provided to staff.*

- Training will be provided to DORS staff on changes resulting from the reauthorization of the Rehabilitation Act (e.g. pre-employment transition services, customized employment, limitations on use of subminimum wage, “competitive integrated employment” criteria, and services to employers).

*DORS provided and/or supported seven training opportunities to staff relating to WIOA.*

- DORS will continue to collaborate with workforce partners in the development and implementation of the Combined State Plan.

*The WIOA Alignment Group, comprised of leaders from all WIOA partner agencies, met on a monthly basis to develop benchmarks and strategic goals to strengthen the competitiveness of Maryland’s workforce and to effectively support Maryland businesses. The WIOA Alignment Group is developing a coordinated effort to disseminate information related to the benchmarks and implementation strategies to staff throughout 2018.*

(2) An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent PY were achieved. The evaluation must:

- (A) Identify the strategies that contributed to the achievement of the goals.  
 (B) Describe the factors that impeded the achievement of the goals and priorities.

(3) The VR program's performance on the performance accountability indicators under section 116 of WIOA.

(4) How the funds reserved for innovation and expansion (I&E) activities were utilized.

(q) Quality, Scope, and Extent of Supported Employment Services. Include the following:

(1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

The quality, scope, and extent of supported employment services are consistent with the definition of supported employment as it is contained in the Rehabilitation Act of 1973, as amended. As required by the WIOA of 2014, 50 percent of the total Supported Employment Allotment will be utilized to provide supported employment services, including extended services, to youth with the most significant disabilities.

The quality of supported employment services is assured through the Division's case review process. Records are reviewed in terms of eligibility, Individualized Plan for Employment, service delivery, case closure, and expenditures. The review emphasizes technical compliance with the Title I and Title VI-B regulations. DORS uses case review findings to identify policies that may require modification or clarification and to identify staff training needs. DORS also conducts periodic onsite reviews of supported employment providers to assure compliance with established policy and procedure and regularly updates cooperative agreements with these facilities.

Supported employment means competitive work in integrated work settings, or employment in integrated work settings. Individuals with the most significant disabilities are working toward competitive work consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. These are persons including youth with the most significant disabilities:

- For whom competitive employment has not traditionally occurred or for whom competitive employment has been interrupted or intermittent as a result of a significant disability; and,
- Who, because of the nature and severity of a disability, need intensive supported employment services from the designated state unit, DORS, and extended services after transition in order to perform this work.

The scope of supported employment services is contained in DORS' Rehabilitation Services Manual II, Section 800. DORS provides ongoing training to counselors about supported employment policy and best practices, including to new staff at the Quality Rehabilitation Training Program conducted at least twice a year.

Supported employment services are defined in the regulations as ongoing support services and other appropriate services needed to support and maintain an individual with the most significant disability in supported employment.

In recognition of the time required to develop employment opportunities and place individuals with the most significant disabilities in employment, DORS policy permits payment of job development and placement as discrete activities within "job coaching". Supported employment

services are any services that assist an individual in entering or maintaining integrated, competitive employment. They also include services necessary to establish and maintain a supported business enterprise. They may include, but are not limited to, the following:

- Development of and placement in jobs or businesses in integrated settings for the maximum number of hours possible based on the unique strengths, resources, interests, concerns, abilities, and capabilities of individuals with the most significant disabilities;
- Intensive on-site job skills training and other training provided by skilled job trainers, coworkers, and other qualified individuals;
- Off-site supports to address issues and concerns;
- Follow-up services, including regular contact with employers, trainers, parents, guardians, or other representatives of trainees, and other suitable professional and informed advisors to reinforce and stabilize the job placement;
- Other services specified in the regulations needed to achieve and maintain job stability; and/or,
- Discrete post-employment services following transition that are unavailable from an extended services provider and that are necessary to maintain the job placement.

All supported employment services are available to all individuals, including youth with the most significant disabilities, determined eligible to receive supported employment services. Individuals are eligible if:

- The individual is eligible for VR services;
- The individual is determined to be an individual with a most significant disability;
- A comprehensive assessment of rehabilitation needs of the individual, including an evaluation of rehabilitation, career, and job needs, identifies whether or not supported employment is the appropriate rehabilitation objective;
- If Supported Employment is not found to be appropriate at the time of comprehensive assessment, DORS will reassess annually.

## **(2) The timing of transition to extended services.**

Supported employment services are provided by DORS for a period not to exceed 24 months, unless under special circumstances the eligible individual and the rehabilitation counselor jointly agree to extend the time in order to achieve the rehabilitation objectives identified in the Individualized Plan for Employment. Services must occur at least twice monthly to assess the employment situation at the job site; at the request of the consumer, they may be conducted off-site. Service providers coordinate and provide intensive services, at or away from the job site, that are needed to maintain employment stability. Following transition, these services are only provided by DORS as post-employment services that are unavailable from an extended services provider and that are necessary to maintain or regain the job placement or advance in employment.

### *Extended Phase (Extended Service Provider)*

Transition to extended services occurs when all objectives on the Individualized Plan for Employment and any amendments to the plan have been met, and the need for support has been reduced or faded to approximately 25 percent or less. This will occur on an individual and

mutually agreed upon basis between the rehabilitation counselor, the consumer, and the provider. In the extended phase, ongoing support services and other appropriate services are defined as extended services. The provision of extended services in supported employment is made possible with cooperative agreements. Extended services include any service(s) needed for an individual to maintain integrated, competitive employment after the individual has transitioned from time-limited support provided by DORS. Such services are based on the needs of an eligible individual as specified in an Individualized Plan for Employment, which includes a statement of the source of the extended services.

#### *Funding*

The supported employment services, made possible by the anticipated state allotment, means that hundreds of individuals with the most significant disabilities will have an opportunity for competitive employment. An allotment of funds to provide supported employment services will be met with similar increases in other agencies' ongoing funds to maintain supported employment services when the DORS time-limited services are completed.

#### *Evidence-based Supported Employment*

DORS has a strong partnership with Maryland's mental health system related to Evidence-based Practice in Supported Employment. This is based on overwhelming evidence that supported employment is the most effective route to competitive employment for consumers with severe mental illness. The partnership is characterized by streamlined access to VR services through guest access of VR counselors into the Behavioral Health Administration's, Administrative Service Organization's case management system; presumption of eligibility for VR services for individuals determined eligible for Supported Employment through the Behavioral Health Administration; and adherence to principles of Evidence-based Practice in Supported Employment.

These principles include:

- Competitive employment is the goal;
- Eligibility for Evidence-Based Practice is based on consumer choice. Consumers are considered work ready when they say they want to work;
- Job search starts soon after a consumer expresses interest in working;
- Supported employment is integrated with treatment. Employment specialists have frequent meetings with the treatment team to integrate supported employment with mental health treatment. (DORS staff participation is critical to success.);
- Follow-along supports are continuous. Employment supports are never terminated unless the consumer directly requests it;
- Consumer preferences are important. Consumer preference plays a key role in determining the type of job that is sought, the nature of supports provided, and the decision about disability disclosure;
- Employment specialists practice systematic job development, based on consumer work preferences and face-to-face meetings with consumers, and gather information about job opportunities and assess whether they may be a good job fit for an individual. Employment specialists continue to make periodic visits to promote networking and achievement of employment; and,
- Personalized benefits planning is provided.

Evidence Based Practices in Supported Employment are funded using a braided model in which the Behavioral Health Administration pays for pre-placement services, VR funds job development, the Behavioral Health Administration funds placement, and VR funds intensive supports at the onset of employment. This effectively makes use of both systems' resources, allowing hundreds of consumers to receive Evidence Based Practices in Supported Employment.

#### *Employment First*

DORS is a partner with other state agencies, including WIOA partner DLLR, and Community Rehabilitation Programs in implementing *Employment First*, a national effort to assure that all individuals with significant disabilities consider competitive, integrated employment on a preferred basis in planning for their lives. *Employment First* is consistent with DORS' belief that individuals with disabilities, even the most significant disabilities, can work in meaningful positions in integrated settings when provided with adequate, appropriate supports. Supported employment is appropriate for individuals in *Employment First* and is the means to assure the best chance for success in employment. Benefits planning is an important part of services for individuals served through *Employment First*.

## VR CERTIFICATIONS AND ASSURANCES

### **CERTIFICATIONS States must provide written and signed certifications that:**

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA,<sup>14</sup> and its supplement under title VI of the Rehabilitation Act<sup>15</sup>;
2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency)<sup>16</sup> agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan<sup>17</sup>, the Rehabilitation Act, and all applicable regulations<sup>18</sup>, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;
3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan<sup>19</sup>, the Rehabilitation Act, and all applicable regulations<sup>20</sup>, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;
4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;
5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.
6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.
7. The (enter title of State officer below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

8. The (enter title of State officer below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;
9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

## **ASSURANCES**

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

### **The State Plan must provide assurances that:**

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

### **The State Plan must provide assurances that:**

1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.
2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
  - (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
  - (b) the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (Option A or B must be selected):
    - (A) is an independent State commission.
    - (B) has established a State Rehabilitation Council.
  - (c) consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
  - (d) the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).

- (e) the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds, (Yes/No)
- (f) the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs, (Yes/No)
- (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan.
- (h) the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.
- (i) all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act .
- (j) the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.
- (k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.
- (l) the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.
- (m)the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:
- (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.
  - (b) impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act .
  - (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No)
  - (d) determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.
  - (e) comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act .
  - (f) comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.
  - (g) provide VR services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
  - (h) comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14)of the Rehabilitation Act.
  - (i) meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs
  - (j) with respect to students with disabilities, the State,

- (i) has developed and will implement, (A) strategies to address the needs identified in the assessments; and  
(B) strategies to achieve the goals and priorities identified by the State, to improve and expand VR services for students with disabilities on a statewide basis; and
- (ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement:

- (a) The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
- (b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
- (c) The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

6. (a) Financial Administration of the Supported Employment Program: The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act. (b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

7. (a) Provision of Supported Employment Services: The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

- (b) The designated State agency assures that:
  - i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act
  - ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

## **VI. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS**

### **TANF PROGRAM (TANF)**

(OMB Control Number: 0970-0145)

States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:

(a) Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).

### **Overview of TANF Programs**

TANF Programs are designed around four main purposes:

1. Provide assistance to needy families so that children can be cared for in their own homes;
2. Reduce the dependency of needy parents by promoting job preparation, work, and marriage;
3. Prevent and reduce the incidence of out-of-wedlock pregnancies; and,
4. Encourage the formation and maintenance of two-parent families.

The State of Maryland's DHS Family Investment Program provides TANF with children while preparing program participants for independence and self-sufficiency. In Maryland, the TANF program is called TCA. The FIA Program assistance consists of services and cash assistance to eligible individuals. The assistance program components under Family Investment Program include TCA, Welfare Avoidance Grants, Child Care and Medical Assistance, as well as a full range of programs targeted at special issues and populations.

The TANF Federal Block Grant funds designated for workforce development are allocated to Maryland's 24 local jurisdictions recognizing that the local jurisdictions are able to accurately target resources, programs, and services needed by their customers. Each local department submits a plan defining the program for their jurisdiction, which includes the core program components. The requirements and procedures may be tailored to fit the unique population of the jurisdiction.

Financial and technical eligibility criteria are the same for all programs, including those funded by state maintenance of effort, unless otherwise noted in program descriptions. The financial (income and resource) eligibility criteria for the Family Investment Program core components are found in the Code of Maryland Regulations section 07.03.03. Unless otherwise stated in their program descriptions, Family Investment Program non-core programs that are described as serving needy families have income criteria but do not have resource criteria.

*TANF Partnership with WIOA for Enhanced Workforce Development Services*

Currently, Maryland's TCA workforce programs are built on connecting individuals to work participation activities that ultimately result in permanent employment. Local departments of social services (LDSS) workforce programs are operated through pay-for-performance vendors, vendors, or the LDSS themselves. This allows the LDSS to achieve the federal TANF performance measure of 50 percent for WPR. DHS will continue to deploy an "employment first" model, but with TANF's new mandated partnership in the WIOA system, DHS can leverage the myriad of opportunities that the WIOA Partners will offer to improve upon the employment and training trajectories of TCA recipients in Maryland.

Over the first four years of the WIOA Combined Plan, DHS will begin to integrate TANF into the WIOA system as a full partner, thus increasing meaningful access to WIOA services for TCA work eligible individuals (WEI) who are determined to be ready, supported, and eligible.

A few WIOA Priority of Service populations, within the WEI TCA group, may include: work ready TCA recipients, TCA recipients between the ages of 18–24 who may be able to take advantage of the new focus on older, out-of-school youth services, individuals receiving or who have exhausted UI and may need TCA, and non-custodial parents. All of these groups fit into Maryland's overall list of targeted populations for Priority of Service. A complete list of Maryland's WIOA Target Populations and additional details on Priority of Service can be found on pages 51–53. In addition, TCA will be able to offer potential services and supports to other eligible customers within the WIOA system, thus providing value to the entire system on the whole.

DHS, in partnership with the 24 LDSS and the WIOA Partners, will implement this partnership using a phased-in approach over the four year period of the Plan in all of Maryland's 12 Local Areas. This will allow for strategic and thoughtful roll-out, flexibility based on crucial local needs and input, evaluation, and ability to change course as needed.

DHS leaders continue to serve on the WIOA Alignment Group to ensure an ongoing active TANF voice. Further, the WIOA Partners in the Alignment Group created under this Plan have ensured that high level leaders from the LDSS, and other decision makers from partnering agencies, have adequate representation on Local Boards. This has ensured local TCA representation for alignment, effective operations, compliance, evaluation, and partnership purposes. To assist Maryland with this phased in approach of TANF integration within the WIOA system, DHS, the LDSS, and other WIOA Partners, successfully completed the Health and Human Services Office of Family Assistance (OFA) Systems to Family Stability National Policy Academy (the Academy). Through leveraging the Academy's resources, tools, and subject matter experts Maryland will continue to:

- Assess the current status of LDSS and Local Area partnerships;
- Provide direct technical assistance and guidance to the areas selected to phase in first. Areas will be offered a variety of technical assistance options to work towards a meaningful, operational partnership;
- Monitor the progress of the partnership plans and provide ongoing technical assistance; and,
- Set up evaluation criteria, to measure the effectiveness of the partnership.

As a general framework, based on a strong individualized assessment, TCA recipients will receive appropriate services through one of three portals: (1) the LDSS only; (2) through a combined effort between the LDSS and WIOA system; or, (3) through the WIOA system only. All services delivered to TCA recipients should focus on: (1) meeting the WPR by placing TCA recipients in federally countable work activities for sufficient hours each week; and, (2) achieving the WIOA performance measures, as applicable. The ultimate goal is for TCA recipients to achieve employment that leads to long-term independence from public assistance. Throughout participation in these activities, the LDSS will provide supportive services that may include: child care, medical assistance, transportation, food assistance, emergency assistance, clothing assistance, and employment retention services.

Through the WIOA system, TCA recipients may:

- Receive Labor Market Information, recruitment, job development, and placement services through WIOA, in partnership with LDSS business services staff;
- Participate in training programs such as short term credentialing training programs, work based learning programs, on-the-job training programs, DLLR's EARN industry-led training programs, Career Pathways training programs, and/or apprenticeships; and/or,
- Participate in Adult Basic Education (ABE), Adult Secondary Education (ASE), or English Language Acquisition (ELA).

In order to achieve this partnership, DHS will continue to:

- Consider co-location of LDSS and/or WIOA Partners at AJCs or LDSS, depending on the nature of local partnerships and operations to:
  - Monitor the progress of TCA WEI and keep them countable for the federal WPR;
  - Become an integrated part of the WIOA Partners and serve customers collaboratively;
  - Become an integrated member of the WIOA Partners Business Services teams (refer to "Business as WIOA Customers" section of the Plan, pages 54–55) in order to engage with the business community collaboratively and provide the best customer service to businesses and jobseekers alike;
  - Develop common intake and assessment strategies; and,
  - Braid and blend funding as appropriate.
- Leverage existing financial and in-kind contributions to the WIOA system:
  - Analyze existing LDSS vendor contracts with the WIOA System and possibly re-tool to create more meaningful access and integration into the WIOA system;
  - Explore partnership models that leverage existing funding to increase TCA recipients' participation in WIOA system programs;
  - Analyze existing co-location contracts or consider co-location of staff or shared space;
  - Provide training and access to DHS's online benefits application and access system, myDHR; and,
  - Offer TCA and other LDSS services as needed.
- Contribute outcomes data to the WIOA system:

- Provide and report on performance data for some of the proposed WIOA Common Measures; and,
  - Use the data to evaluate the TANF/WIOA partnership.
- Participate in Statewide WIOA Partners activities:
  - Serve on the statewide WIOA Alignment Group;
  - Participate in the planning of Maryland's WIOA Convening; and,
  - Contribute to the Jobseeker Advisory Groups to ensure the inclusion and participation of TANF recipients on the Advisory Groups

Maryland will leverage DHS's research partner to research, track, and evaluate the TCA partnership with the WIOA system throughout the life of this first WIOA Combined Plan. As Maryland continues to rollout the partnerships regionally and statewide, a research partner will provide the WIOA Partners with data and recommendations of how the partnership are working regarding such components as performance, types of WIOA services for TCA recipients, collaborative policies and procedures, shared funding, administration, alignment of program missions, and cross-program staff training and knowledge.

#### *Current TANF Workforce Programs*

DHS, through the local departments, provides workforce related services and referrals to all applicants or recipients of TANF assistance. The local departments have the responsibility and some flexibility, within State and Federal guidelines, to develop the systems, processes, and programs necessary to implement the work requirements of the Act specific to their local jurisdiction.

Annually, the local departments submit their local plans called the Partnership for Achieving Self-Sufficiency (PASS) Plans. These plans describe the activities that local departments will operate to implement the work requirements of the TANF law.

Plan goals include:

- Maintain current TCA Work Program goals:
  - A minimum WPR of 50 percent – This goal is important because WPR is a key benchmark that the federal government uses to evaluate the effectiveness of Maryland's TCA program;
  - Universal Engagement (All TANF recipients must be engaged in a federal or State defined activity unless otherwise exempted); and,
  - Job placements at prevailing minimum wage (federal, state or local) Job placements in \$10/hour jobs;
- Improve outcomes for all workforce development vendor contracts;
- Develop meaningful partnerships that advance DHS goals, to include partnership with the WIOA system; and,
- Leverage local, State, and federal resources to assist individuals with moving towards self-sufficiency.

The Local PASS Plans also include the State-defined work activity of substance abuse treatment for the purposes of section 402(a)(1)(A)(ii) of the TANF law as well as any additional locally

defined work activities that are also incorporated as state defined activities for the purposes of that section of the law. As long as the individual is participating with substance abuse requirements and is not able to participate in a work activity, the substance abuse treatment is considered the individual's activity for a specified length of time.

In order to monitor and ensure that TANF recipients are engaging in work activities, DHS uses a key tool, the PASS Scorecard (FY 2014 and FY 2015 performance included in the Plan) to obtain a snapshot view of a local departments' performance. The Scorecard posts three critical metrics that indicate the overall levels of performance local departments made in engaging TANF recipients in work activities and moving them into employment. These measures include: the universal WPR; universal engagement; clients placed in employment; and clients placed in full-time employment paying \$10 per hour or more.

#### *Other TANF Program Descriptions*

In addition to workforce development, Maryland's TANF program provides a broad range of other services. The Department's FIA formed partnerships with other administrations within DHS, including the Child Support Enforcement and Social Services divisions, and with other State agencies and community organizations. DHS's FIA works with these partners to promote DHS's goal to protect children by assisting their families to become independent through work, personal and family responsibility, and community involvement.

The Department expanded its goal to include support for low income working families. This new edition to the TANF portion of Maryland's Combined State Plan continues to strengthen those partnerships by empowering staff in offices across the State to work together to provide employment and training activities, supportive services, and benefits that enable customers to get jobs and improve their economic circumstances. Additionally, Maryland is committed to providing targeted services to customers facing multiple barriers to employment, including LEP and disabilities.

This Plan includes a full range of programs targeted at special problems and needy populations in every jurisdiction throughout the State. These programs are:

#### **Core Family Investment Program Components**

Eligible individuals may be referred to one or more program components during the application process. The Family Investment Program core components all have the same eligibility criteria mentioned above, unless noted in the component description. They are funded out of TANF, TANF-MOE or Commingled Funds as appropriate and as reported in Maryland's fiscal reports.

#### **TCA**

Individuals may apply for TCA when available resources and referrals do not fully address their families' needs. Applicants must satisfy child support requirements before their applications for TCA are approved. Medical Assistance eligibility is determined in a separate determination and system for each member of an active TCA assistance unit. DHS contracted with two vendors

who are qualified to implement TANF/workforce programs for refugees and/or asylees: the International Rescue Committee and the Ethiopian Community Development Center. In order to qualify as a provider for refugee services, vendors must be authorized through the Department of Homeland Security, Bureau of Citizenship and Immigration Services, and the United States Department of State, Bureau of Population, Refugees and Migration.

### **Diversion Programs**

Maryland operates a diversion program, the Welfare Avoidance Grant (WAG). A local department may offer a WAG according to criteria described in a local plan approved by DHS. A WAG is a one-time only, short-term cash benefit to a family with children, which is paid based on an agreement signed by the applicant or recipient and the local department. Following the intent of §407 of the Social Security Act, WAG is a non-assistance TCA diversion program that provides for a specific family episode of need, rather than a chronic or continuing situation. The WAG provides funding to meet that need so that the breadwinner may take a job or return to a job. A WAG payment is not intended to cover a family's on-going needs. Applicants or recipients may not receive TCA during any period covered by a WAG. An application for TCA is denied during the period covered by the WAG. Any on-going TCA case would be closed. This program provides non-assistance.

### **Alternative Programs**

An alternative program is an optional program, in addition to Family Investment Programs, which may be developed and implemented by a local department to achieve the Family Investment Program goals. The program shall have the approval of the Secretary of DHS, is funded within the local department's allocated funds and any local supplement, and operates within Federal requirements. Local Department welfare diversion programs are included in this category.

### **Emergency Assistance to Families with Children**

Maryland's Emergency Assistance to Families with Children program uses TANF funds to operate. Funds are allocated to local departments to meet emergencies for families with children. The financial eligibility criteria for this component differ from the other components, in that the family is needy if they have an emergency situation, as defined in the local plan, and do not have income or readily available liquid assets to meet that emergency. The family must have at least one child under the age of 21 and the emergency cannot have been created by quitting a job.

### **Program Requirements**

The following section outlines requirement for the State's TCA Program.

#### **Assessment**

The application for a Family Investment Program includes an assessment to consider the individual's reasons for applying for, or continuing to rely on, assistance, educational level, job

skills and readiness, identifying potential impairments, disabilities, and interests to enable evaluation for appropriate program activities, and any available personal and family resources to facilitate independence. Based on the assessment of needs, the local department offers supportive services to the individual which may include, but are not limited to:

- Child support services;
- Job services;
- Supplemental Nutrition Assistance Program (SNAP / Food Supplement Program);
- Medical Assistance;
- Social services;
- Referral to Family Planning and Early and Periodic Screening, Diagnosis, and Treatment Services;
- Child care;
- Transportation; and,
- Other appropriate services.

The applicant signs a Family Responsibility Plan with the local department specifying the requirement to comply with requests for cooperation, participation in work activities, and supportive services which the local department provides. The applicant's actions may include, but are not limited to, participating in child support activities, job search activities, employment activities, community service, and substance abuse treatment programs, if appropriate.

### **Application Decision**

A decision on an application for any Family Investment Program component is made as promptly as possible, but no later than 30 calendar days from the date the signed application is received in the local department.

### **Residence**

The applicant and all recipients shall be residents of the State. A resident of the State is one who is living in the State voluntarily, and not for a temporary purpose, and has no immediate intention of moving from the State, and is not receiving assistance from another state.

### **Citizenship Status**

A Family Investment Program recipient must be a U.S. citizen or a qualified alien as defined in §8 USC 1611 et seq, as amended. A State program for other qualified legal immigrants who are not eligible under federal law has been developed and is paid with 100 percent state maintenance of effort (MOE) funds.

### **Employment and Education Requirements**

Each adult in the assistance unit, and each child age 16 years or older in the assistance unit who is not enrolled full-time in school, must participate as requested in a work activity which is approved by the local department and is likely to result in unsubsidized employment. The participation requirement is based on the concept of immediate universal engagement and is compliant with the 24 month work rule found in §402(a)(1) A (ii) of the TANF law.

Exemptions from the work activity requirements are:

- A single custodial parent who is required to care for a child under age one who is a member of the assistance unit (This exemption applies for a cumulative total of 12 months for a parent's lifetime and does not apply to each child); and,
- Children under age 16;
- A teen parent (either head of household or included as a child on an adult's TCA case) who has not finished secondary school may not be exempt to care for a child younger than one year old;
- A caretaker relative in assistance unit with a child cared for by a non-parent relative who has demonstrated need, and has no dependent children of his or her own in the assistance unit; and/or,
- Immigrant, parent/caretaker relatives who are not eligible for federal TANF assistance, with the exception of adult only qualified immigrant households for which TCA eligibility is based on an unborn child.
- Failure of any non-exempt adult to cooperate in a work requirement without good cause, including failure to accept offered employment, shall result in ineligibility for the entire assistance unit until the household cooperates.

### **Work Requirements**

The State of Maryland provides work-related services and referrals for services to all applicants or recipients of TCA. These referral services are initiated at the local departments. The local departments have the responsibility and limited flexibility, within State and Federal guidelines, to develop the systems, processes, and programs necessary to implement the work requirements of the Act specific to their local jurisdiction.

### **Quitting a Job**

When an adult voluntarily quits a job within 30 days of their TCA application date, the entire assistance unit is ineligible for TCA for 30 days after the quit. When a 16–17 year old child applicant who is not enrolled in school voluntarily quits a job within 30 days of the TCA application date, the child is ineligible and the child's incremental portion of the TCA grant is not paid. To be eligible, the adult or child must work at a new job or wait 30 days after the quit date to apply for TCA. When an adult recipient voluntarily quits a job without good cause, the entire assistance unit is ineligible after conciliation and sanction procedures are applied. When a 16–17 year old child recipient who is not enrolled in school voluntarily quits a job without good cause that child is ineligible and the child's incremental portion of the TCA grant is not paid. Work sanctions are imposed on both adults and children over age 16 and must be cured before benefits are paid. Good cause reasons are stated in the Code of Maryland Regulation at 07.03.03.07.

### **Participation Rates**

The State of Maryland elects to take the option to exempt individuals from work requirements and participation rates that are single custodial parents of a child under the age of 12 months. This exemption applies for a cumulative total of 12 months for a parent's lifetime and does not apply to each child.

## **Child Support Requirements**

As an eligibility condition for the Family Investment Program, the caretaker relative must file an application for child support enforcement services at the time of application for the Family Investment Program, and assign to the State the right to support for any child included in the Family Assistance Program assistance unit for the period of time the child receives Family Assistance Program assistance. The TANF policy and Maryland regulations were revised to address the Deficit Reduction Act of 2005 changes to child support requirements. The caretaker relative must, unless exempt for good cause, cooperate in the establishment and enforcement of child support for each child in identifying and locating the absent parent of a child for whom assistance is requested, establishing the paternity of a child born out of wedlock for whom assistance is requested, and obtaining support payments or any other payments or property due to the caretaker relative or the child for whom assistance is requested. A determination of non-cooperation without good cause or adequate reason results in ineligibility of the entire assistance unit until the household cooperates.

## **The Assistance Unit**

The assistance unit includes parents or another caretaker relative acting as a parent, a minor child, or a pregnant woman. The degree of relationship for the caretaker other than a parent is not a factor. A minor child is under the age of 18 or expected to complete a program of secondary education or the equivalent level of vocational or technical training before the child turns 19.

To encourage the formation and maintenance of two-parent families, one parent and two-parent assistance units are treated the same and follow the same regulations even though they have different funding sources. When determining the amount of the TCA benefit, the needs of the assistance unit may not include a child age 16 (not head of household) or older who is not a full-time student and who failed to comply with work requirements without good cause. The assistance unit may not include families with an adult head of household or spouse who has received 60 months of benefits under this Act, unless the individual lived in Indian Country as described in §408 of the TANF law or is included in the 20 percent of caseload exception allowable under the TANF law. Nor may it include a teen parent who is not participating in educational activities directed at the attainment of a high school diploma or its equivalent.

The needs of an individual failing to comply with substance abuse treatment requirements are removed from the grant. Also, an individual may not be included in the assistance unit for ten years, if the individual misrepresented a residence in order to receive duplicate benefits. In addition, an individual who is a fugitive felon or parole and probation violator as described in §408 of the TANF law may not be included in the assistance unit. The assistance unit does not include the caretaker relative in families with a child cared for by a non-parent relative who has not demonstrated need and has no dependent children of his or her own in the assistance unit.

The assistance unit cannot include immigrant, parent/caretaker relatives who are not eligible for federal TANF assistance, with the exception of adult only qualified immigrant households for which TCA eligibility is based on an unborn child. Adult only legal immigrant households will be one of the Separate State Program TCA sub-populations. For the federal TANF funded families, a room and board payment is made for the children only. The adults are not included in the assistance unit. Any 100 percent federal TANF funded assistance unit with a dependent 19

year old student in a household that shows a demonstrated need will qualify for separate state funded TCA.

The assistance unit may include married same gender adults and their child/ren. The children must be related to both parents by birth/blood, marriage, or adoption for both parents to be eligible for TCA. In situations where only one parent in the marriage is related to the child/ren, the assistance unit will be treated as a stepparent case. Maryland also serves families with a parent and/or child who has a disability which will last more than 12 months and who is required to apply for SSI, and the SSI application is approved, pending, or in the appeal stage with 100 percent TANF funds. This program includes services to assist the recipient adult/child apply for and pursue eligibility for SSI benefits.

### **60–Month Time Limit**

Families that reach their 60–month time limit and are granted a hardship exemption remain eligible for TCA. Families that reach their 60–month time limit and are not meeting one or more of the Family Investment Program requirements are not eligible for TCA. Criteria for granting a hardship exemption are stated in the Code of Maryland Regulation at 07.03.03.20. Penalties for not meeting Family Investment Program requirements are stated in Code of Maryland Regulation at 07.03.03.19.

### **Primary Prevention Initiative**

As part of the plan to both reduce infant mortality and encourage children to remain in school, Maryland requires TCA recipients with children, age seven and under to provide medical documentation of annual health checkups. TCA recipients with children age seven and over must verify their children are registered in and attending school at least 80 percent of the time. Children not meeting either the health verification requirement or the school attendance requirement cause a TCA disallowance or reduction in the TCA benefit of \$25 per child, per month. When the child is back in compliance, the full benefit is reinstated.

### **Families Served in a Separate State TCA Program**

Because of their special circumstances, the State of Maryland serves the following families in a Separate State TCA Program funded with 100 percent TANF Maintenance of Effort funds.

The eligibility requirements are the same as for TANF/TANF–MOE funded families:

- Families where there are qualified immigrant adults (admitted to the country on or after August 22, 1996) who are not eligible under federal law, but meet all other TCA eligibility requirements and include a pregnant adult, but no other children. A separate State program will serve these families until the child is born;
- Families consisting of a parent (or parents) or a non-parent caretaker relative (or non-parent caretaker relatives) with the only child (or children) in the household who is a full time student in a secondary school or an equivalent program and expected to graduate in the year the child turns 19. Eligibility ends the month after the month of the child's graduation; and/or,
- Adult parents in families that are determined by the local department to be exempt for reason of hardship and who meet all other TCA technical and financial eligibility

requirements, are not eligible under federal law because of the 20 percent hardship exemption limit.

### **Families Served in a Segregated State TCA Program**

Because of their special circumstances, the State of Maryland will serve the following families in a TCA Program funded with State funds segregated within the TANF program. The eligibility requirements are the same as for TANF/TANF-MOE funded families:

- Families with at least one assistance unit member who is employed;
- Has countable earned income; and,
- Receives Maryland's 40 percent income disregard.

These families are not subject to the 60-month time limits but are subject to all other TCA requirements.

Because of their special circumstances, the State of Maryland serves the following families in a Segregated TCA Program funded with Federal TANF funds. Maryland uses TANF funds to provide adoption services (that do not constitute "assistance") to a needy family in which an unrelated adult is in the process of adopting a child.

To qualify on the basis of income:

- The annual adjusted gross income, as defined by the Internal Revenue Service, of the prospective adoptive family may not exceed 80 percent of the latest published figure for the median income for a family of that size for the State, as set forth in Schedule A under COMAR 07.02.04.11;
- The adoptive child is included in determining the family size;
- The annual adjusted gross income of the family shall be the latest figure that was reported to the Internal Revenue Service. In this circumstance, Maryland cannot provide income support (i.e., assistance) to the family prior to adoption, because the family would not include a child living with a parent or adult relative. Maryland uses segregated Federal TANF funds to pay for the services because the family would not be an "eligible family" for Maintenance of Effort purposes. Funds used for this program are for services and are non-assistance, outside the purview of the IV-E (child welfare) program and meet the first purpose of TANF.

### **Families Served with State General Funds Not Counted Toward the TANF Maintenance of Effort Requirement**

Maryland opts to serve families with two able-bodied parents, including same gender married couples, in the assistance unit in a program with its own funds and will not count these funds toward its TANF Maintenance of Effort requirement. Such families are subject to the work requirements of the TCA program.

### **Minor Children Who Are Absent From the Home for a Significant Period**

States may opt out of paying TCA for a child who has been, or expected by a parent or other caretaker relative to be, absent from the home for a period of 45 consecutive days, or at the

option of the State, a period of no less than 30 and not more than 180 consecutive days. The State of Maryland elects the option to continue assistance for a child absent from the home fewer than 180 consecutive days. The State of Maryland elects the option to establish a good cause exception to allow children to exceed this 180 day limit: when the absence is for educational or treatment purposes, approved by the Secretary, the parent does not relinquish responsibility for the child, and the removal of the child from the assistance unit creates a hardship for the child's family.

### **Unmarried Minor who is a Parent or Pregnant**

When TCA is granted for a minor who is an unmarried parent or pregnant, the minor shall reside in the household of the minor's parent, legal guardian, other adult relative, or in a supportive living arrangement in order to receive assistance. The parent, legal guardian, or the adult supervisor in a supportive living arrangement is the authorized representative for the unmarried parent or pregnant minor.

### **Relative of a Minor Child who is Absent for a Significant Period of Time**

Assistance may not be provided for a period of three months, to a parent (or other caretaker relative) of a minor child, who fails to notify the local department of the absence from the home of the minor child, by the end of the 5-day period that begins with the date it becomes clear to the parent that the minor child will be absent longer than 180 days.

### **Child Care Allowance**

A disregard of out of pocket child care payments from earned income may not exceed \$200 per month for the care of each child in the assistance unit when the caretaker is employed 100 hours or more, or \$100 per child in the assistance unit when the caretaker works less than 100 hours per month.

### **Income Calculations**

The TCA income calculations are stated in the Code of Maryland Regulations at 07.03.13. Eligibility for benefits is measured against a payment standard at 07.03.03.17, which is reviewed each year. These income calculations apply to both members of an assistance unit and non-members whose income is countable to the assistance unit. Each member of the assistance unit is considered to be a recipient of the Family Investment Program, even though no cash assistance is paid. The income countable to TCA from a stepparent is determined by excluding income which falls below 50 percent of the official poverty level established under the Federal Community Services Block Grant, adjusted for family size, and counting as available to the TCA benefit, income which equals or exceeds 50 percent of the poverty level established under the Federal Community Services Block Grant, adjusted for family size.

### **Benefit Amount**

The local department determines the TCA benefit payment amount by deducting the net countable income, rounded down to the nearest dollar, from the allowable amount for the assistance unit size. The period of time covered by the TCA benefit is a calendar month. The assistance unit budget is determined for the length of the eligibility period or until there is a change in circumstances. At the end of the eligibility period, the family's eligibility for

assistance is re-determined and the budget is re-calculated. The eligibility period is usually four, six, or 12 months, set by the local department based on the family's circumstances.

### **Assets**

Effective May 1, 2010, the State of Maryland chose to exclude all assets for the financial determination of TCA benefits.

### **Drug Felonies**

In order to receive assistance, individuals convicted of drug king pin or volume drug dealer felonies must agree to random drug testing and treatment if necessary. Individuals who fail to comply with drug testing or treatment are denied TCA and Food Supplement Program benefits. Individuals convicted of a drug king pin or volume drug dealer felony after receiving assistance are ineligible for TCA and Food Supplement Program for one year from the date of conviction and are subject to substance abuse testing for a period of two years from the date of:

- Release from incarceration
- Completion of probation
- Completion of parole or mandatory supervision
- Sanctions for Noncompliance with Program Requirements

### **Failure to Comply with Program Requirements**

When an adult does not comply with program requirements, the entire assistance unit becomes ineligible. The Family Investment Program case manager investigates the reasons for noncompliance and helps the individual comply by sending a letter to schedule a conciliation conference, and by following up through telephone or personal contact to the extent appropriate and feasible. The first sanction is not imposed less than 30 days from the start of the conciliation process. For noncompliance with any program requirement other than a work activity, TCA is resumed upon compliance with the program requirement. When a 16–17 year old child, who is not enrolled in school, does not comply with a work activity, the child's needs are removed and the child remains a member of the assistance unit. The TCA grant for the family is therefore reduced by the child's incremental portion. For noncompliance with a work activity, TCA is resumed immediately upon compliance in the first instance of noncompliance, after ten days of compliance with the work activity in the second instance or after 30 days of compliance with the work activity in any future instance. States may elect to allow Medical Assistance eligibility to adults who fail to comply with work requirements until compliance is met. For noncompliance with the requirement for prohibited use of an electronic benefits transfer card for federally funded cash assistance programs, **Maryland elects to warn recipients in violation the first time that their EBT card is in danger of being revoked. After a second instance of using the electronic benefits transfer card to access TCA benefits, it will be revoked. Recipients whose electronic benefits transfer cards have been revoked will be required to either provide checking or savings account information for direct deposit of their assistance benefits, or accept a paper check.**

### **Sanctions for Intentional Program Violations**

An individual who has waived the right to an administrative hearing, or was found to have committed an intentional program violation, is ineligible to participate for a period of 12 months after the first finding of fraud or until full repayment of any overpayment of TCA benefits, 24

months after the second finding of fraud or until full repayment of any overpayment of TCA benefits, and permanently after the third finding of fraud. Allegations of potential TCA fraud must be reported by any individual or entity working with the TCA program.

### **Fraud Under Means–Tested Welfare and Public Assistance Programs**

If an individual's benefits under Federal, State, or local law relating to a means–tested welfare or a public assistance program are reduced because of an act of fraud by the individual under the law or program, the individual may not, for the duration of the reduction, receive an increased benefit under any other means– tested program.

### **Other Sanctions**

Maryland elects to sanction a family, which fails to ensure that minor dependent school age children attend school, and minor dependent preschool children receive preventive health care. The sanction is a disallowance of \$25 per child not meeting the attendance or health care requirement.

### **Timely Notice of Termination or Reduction**

The local department mails or hand delivers advance, written notice at least ten calendar days before the date of reduction, termination, or suspension action.

### **Local Department Waivers**

Any LDSS may submit a request for a waiver of Family Investment Program regulations to the Secretary of DHS. The waiver(s) may be granted for up to two years if the Secretary determines that the waiver:

- Promotes more efficient, effective, and appropriate management and delivery of Family Investment Program services and benefits;
- Improves opportunities for Family Investment Program customers to gain self-sufficiency;
- Provides more flexibility to the LDSS in administering the Family Investment Program; and,

Remains cost neutral for the duration of the waiver.

A waiver that violates federal law or regulations may not be granted to any local department unless prior approval has been received from HHS. The Secretary has the authority to terminate a waiver by written notice to the LDSS 30 days prior to the effective date of the termination.

### **Demonstration Projects**

Demonstration projects are developed through grants to non–profit organizations in partnership with local departments and approved by DHS. The Department may also contract with non–profit organizations including charitable, private, and faith–based organizations, and institutions of post–secondary education to develop demonstration projects. Faith–based organizations may participate in the Family Investment Program demonstration projects on the same basis as any other non–governmental entity. The funds allocated to demonstration projects may not be used to further sectarian religious instruction or worship. An individual may not be required to accept assistance from a faith–based organization if acceptance would violate the individual's bona fide religious beliefs and practices.

All demonstration projects are subject to prescribed outcomes consistent with the Department's mission, goals and objectives. All demonstration projects must meet specified performance measures as developed by the Department as prescribed by the State's Managing for Results guidelines. The Secretary of DHS will award grants for these demonstration projects through a competitive bid process which includes the issuance of a request for a proposal in accordance with the requirements of the Human Service Article §5–319 Annotated Code of Maryland, and establishment of an evaluation panel to review competing proposals and to recommend to the Secretary of DHS those proposals which have the greatest programmatic and financial merit. Multi-year awards based on program performance may also be considered. The request for demonstration project proposals requires applicants to specify the ways in which the proposed demonstration projects create incentives for increased employment and job retention.

### **Cooperative Living Project**

A Cooperative Living Project will provide its participants on-site child care, communal dining facilities, job readiness programs, and other support services necessary to move participants toward economic self-sufficiency. A Cooperative Living Project may provide its participants living quarters, recreation programs, and individualized case-management. Participants in a Cooperative Living Project are chosen from volunteers eligible for TCA benefits. Participants enter into an agreement with the non-profit organization to attend at least one communal meal per day. While unemployed, participants share in responsibilities for meal preparation, and cleaning and maintaining demonstration project facilities. Participants also assist in providing child care for children of participants in the Cooperative Living Project, and work towards achieving economic self-sufficiency.

### **Formula for Disbursement of Funds**

While TCA cash assistance is distributed centrally through an Electronic Benefits Transfer system, the Department allocates funds to local departments for child care, work activities, welfare avoidance, emergency funds, administration, and other services that the Secretary of DHS deems appropriate for the program.

### **Displaced Workers Grievance Procedure**

Maryland has established and maintains grievance procedures to resolve complaints concerning the displacement of workers by an adult in a work activity associated with the Family Investment Program.

### **Non-Custodial, Non-Supporting Minor Parents**

Maryland does not currently provide activities for non-custodial, non-supporting minor parents within its TANF program.

### **Other options**

Maryland does not have Tribal Family Assistance as a category of assistance.

## **PROGRAMS FUNDED BY COMMINGLED FUNDS**

Maryland has developed a broad array of services for families and children that are reasonably calculated to accomplish the first and second purposes of the TANF law. These are funded out of

federal TANF and TANF Maintenance of Effort funds or other sources. Maryland has designed these programs to be as effective and efficient as possible. Using the flexibility in the statute and regulations, Maryland will report the exact amount of federal TANF and/or TANF Maintenance of Effort funds charged to these programs using the appropriate federal mechanisms. Unless otherwise noted, for the purposes of this Plan and federal reporting, eligibility for the following programs is generally limited to those families with incomes under 300 percent of the federal poverty level at the time of service delivery.

### **Substance Abuse Treatment for Non–Waiver Recipients**

Maryland has a IV–E (child welfare) waiver to use federal funds to provide substance abuse treatment services to the parents of children who are at risk of placement or have been placed in foster care and are eligible for IV–E (child welfare) funds. This program is designed to serve those ineligible for the waiver program. This substance abuse and treatment model focuses on intervening with families and breaking the substance abuse and child maltreatment cycle. The program’s purpose is to help needy families, who have income within 300 percent of poverty, so that children may be cared for in their homes, and end the dependence of needy parents on government benefits by promoting job preparation, work and marriage.

The program provides non-medical intensive case management and supportive services to caretaker relatives whose children are in foster care or at risk for being placed in foster care. One of three treatment options are available—a residential treatment up to 180 days with or without children, a 28-day intermediate care facility, and an intensive outpatient program (90 days to nine months). The program’s design is shaped from a social services perspective and requires collaboration with health, drug treatment, education, and other essential service delivery entities. The intent is to provide the services of a gender-specific treatment program. The design: (1) provides drug treatment and support services to substance abusing parents and caretakers; (2) provides drug affected children the treatment and support services to overcome the trauma of physical abuse, sexual abuse, and neglect that can occur as a result of living with a substance abusing caretaker relative; and, (3) prevents unnecessary out-of-home placements or reduces the length of stay of children already placed in foster care. A unique program feature is a committed collaboration between State and local departments of social services, State and local health departments and the treatment provider. This program provides non-assistance.

### **Children in Need of Assistance – Drug–Addicted Babies (1997 Md. Laws, Chapter 367)**

The purpose of the SB 512 Program is to identify newborns exposed to heroin, cocaine, and crack cocaine, to refer the mothers to drug treatment, and to provide supportive services to the families. Hospitals assess mothers for risk of child abuse and neglect. When deemed high risk, the mother is referred to the LDSS and to drug treatment. If the mother refuses drug treatment or does not successfully complete drug treatment, and if neither the mother nor the father is able to provide adequate care for the child, the LDSS may file a Child In Need of Assistance and begin the process of termination of parental rights. The program serves up to 300 women who deliver newborns exposed or addicted to heroin, cocaine, or crack cocaine in seven jurisdictions statewide. Services are available to both TCA and non-TCA recipients who are within 300 percent of the poverty level. This program does not serve women whose parental rights have been severed. This program provides non-assistance.

### **DHS/SSA Model Demonstration Program at Tuerk House**

DHS has entered into contracts with the Baltimore City Health Department for the purpose of providing substance abuse treatment for Baltimore City parents receiving TCA for themselves and their children with an identified substance abuse problem. Those parents are provided access to seven substance abuse treatment beds at the Tuerk House substance abuse treatment program. Additionally, customers receive continuing treatment, as prescribed, parenting classes, and support in the community. The primary objective is to demonstrate that a comprehensive family focused, community based, integrated substance treatment and support service delivery model reduces and prevents child maltreatment and other problems that jeopardize the health, safety, and independent survival of some families. The program also provides help to needy families, so that children may be cared for in their homes in an effort to end the dependence of needy parents on government benefits by promoting job preparation, work and marriage. Eligibility is limited to families with income below 300 percent of the federal poverty level. This program provides non-assistance.

### **Post-Entitlement Case Management Services**

Services are provided to former TCA customers within twelve months of leaving TCA. Case management services are provided to former TCA families for up to twelve months from the family's last TCA grant. These services are tailored to help the family stay off assistance by providing individualized support and referrals to the family. The purpose is to end dependence of needy parents by promoting job preparation, work, and marriage. Eligibility is limited to families with income within 300 percent of poverty and \$5,000 or less in assets. This program provides non-assistance.

### **Attendant Care Program**

The Attendant Care Program allows individuals, in needy families with children, with chronic or permanent physical disabilities, to maintain their independence, and live with their families in their own homes. This includes adults who are currently employed or seeking employment or enrolled in post-secondary or higher education. The program also serves adults who can be discharged from, or avoid placement in, a nursing home or similar institution to live at home with their family on the basis of receiving these benefits. However, Maryland will only claim expenditures made on behalf of eligible families. The program provides financial reimbursement to adults who must rely on the services of attendants for help with bathing, dressing, eating, and transportation, in order for them to seek or maintain employment, participate in an educational or training program, or to prevent an institutional living arrangement. Eligibility is limited to families with income below 300 percent of the federal poverty level. Payment is calculated using a sliding scale based on annual gross income and family size. This program provides non-assistance.

### **In-Home Aide Services Program (IHAS)**

This program assists individuals in needy families with activities of personal care with nursing supervision, chore services, meal planning and preparation, transportation/escort services, respite care, training in self-care, and/or care taking skills (help with children or homemaking tasks). The program also offers family members training in care-giving skills, and guidance and support in coping with stress associated with care giving. Another component of the program provides Parent Aides, who intervene to prevent child abuse and neglect by providing hands on service,

help with children or homemaking tasks when parents are unable to perform these activities. As a result, the home remains a safe environment for the child and there are more opportunities for the parent to interact with the child. This program serves families under 300 percent of the poverty level. This program provides non-assistance.

### **Job Skills Enhancement Pilot Program**

The Jobs Skills Enhancement Pilot Program is in limited areas and targets newly employed, unskilled, and semiskilled, current TCA recipients. Former TCA recipients are also targeted as part of the post-entitlement continuing services package provided to families beyond cash assistance. Participants are provided with training to enhance existing skills, gain additional or alternative skills, or learn interpersonal communication and other related skills to retain their jobs and increase the potential for advancement beyond their entry-level positions. The pilot program is administered by the Local Departments of Social Services or through the State service delivery area system. This program provides non-assistance. Current TCA recipients are eligible for this program. Former recipients are eligible if they meet the criteria below:

- Former recipients' assets must not exceed \$5,000;
- Income cannot exceed 300 percent of the federal poverty level for a comparable family size; and,
- One vehicle for each employed family member is excluded.

### **Job Skills Enhancement for Non-TCA Families Program**

The Job Skills Enhancement for Non-TCA Families Program provides comprehensive job skills enhancement services to low-income working families whose employed members' lack of job skills consigns the family to inadequate income and little opportunity for improved earnings in the future. Such families are at risk of welfare dependence. By enhancing the job skills of these wage earners, this program improves participants' incomes and their capacity for long term financial self-sufficiency. The Job Skills Enhancement for Non-TCA Families Program offers comprehensive workforce support services including, but not limited to, child care, transportation, skills training, and more. The program provides non-assistance services and not payments. Close interagency cooperation and extensive involvement of the business community, from whom skill enhancement services are procured, characterize the program.

Participants, all of whom are voluntary, receive a menu of services tailored to meet their individual needs. Recruitment and orientation is followed by an individual assessment to assist program participants in defining skills, aptitudes, and interests. Assessment results are used to identify and develop the participant's Individual Training Plan. The Individual Training Plan identifies the participant's goals, action steps, outcome measures, and specific time frames – not to exceed one year. This jointly developed plan outlines appropriate training and education to meet the states career objectives. Job skill enhancement activities may include experiential learning and/or formal training.

In addition, the program's multi-agency configuration and its close links with the business community affords participants the opportunity to enroll in on-the-job training, job shadowing, career exploration, business tours, mentoring activities, and more. Information pertaining to job openings, industry projections, labor market analyses, and job skill demand are utilized to assist participants in developing their Individual Training Plan. The program is a diversion program intended to assist Maryland families in avoiding welfare dependency by improving their job skills, and thus, their capacity for achieving long-term financial self-sufficiency.

For program purposes, “family” also includes a pregnant woman or a parent with one or more minor children or a caretaker relative with one or more minor children. Targeted customers are Maryland families whose adult wage earners have been employed for a minimum of six months for not less than 30 hours per week in entry-level and other positions with limited potential for advancement and whose income meets the program’s eligibility criteria. Participant families are limited to those with an annual earned income up to 300 percent of the federal poverty guidelines, adjusted for family size and \$5,000 or less in assets. The program will also exclude one vehicle for each working person in the family. This program provides non-assistance.

### **Family Preservation**

Family Preservation represents a variety of programs available to families to provide supportive services to promote safety and well-being of children and their families. This includes families with identified stresses around family life, including disruption, child abuse and neglect issues, domestic violence, homelessness, substance abuse, mental health, physical health, and educational concerns, who are within 200 percent of the poverty level. The principal purpose behind these programs is to enable children to continue to live and thrive in their home with their parents or relatives. Each program is child safety based, goal oriented, family focused, flexible, provided in the home or community, culturally relevant and sensitive, and designed to build on family strengths and unity. Manageable caseload sizes and a team approach of social worker and case associate are an integral part of all services. Each service has designated timeframes, with the possibility for limited extensions when service goals have not been realized. Employment and self-sufficiency are program goals and part of the mutually agreed upon family service agreement. This program provides non-assistance.

### **Individual Development Accounts**

Maryland and/or local jurisdictions may elect to fund Individual Development Accounts for families under 300 percent of the poverty level, in accordance with local plans and budgets. Federal funds are not used for Individual Development Accounts. State General Funds or local funds may be used to fund these Individual Development Accounts. These programs provide non-assistance.

### **The Eviction Assistance Program**

To prevent homelessness, this program provides funds to local jurisdictions to hire staff and work with families under 300 percent of the poverty level who are facing imminent eviction. The recipient of a grant must show that the grant will resolve the issue.

### **The Displaced Homemaker Program**

This program provides a continuum of comprehensive services to help individuals, who have income less than 300 percent of the poverty level, enter or re-enter the workforce in order to become self-sufficient. Recipients must be: 35 years or older; experienced a loss of income through separation, divorce, disability or death; received assistance through care of a child on TCA and are no longer eligible or have received TCA for 24 or more months. This program provides non-assistance.

### **The Maryland Emergency Food Program**

This program provides cash grants to assist emergency food providers (including soup kitchens and food pantries) in purchasing food for needy families with income under 300 percent of the poverty level. This program provides non-assistance.

### **Summer Youth Employment Program**

The summer youth employment program is designed to provide work subsidies for work placements focused on basic skills enhancement and the opportunity to learn marketable work skills. These summer programs can operate in partnership with WIOA Partners, thus creating robust work experiences for youth. Program counselors help youth develop positive work habits and attitudes and can reinforce the relationship between the skills acquired on the job and what is learned in an educational setting. Transportation for youth to travel to and from the work site may also be provided. Summer youth employment programs reduce the risk of welfare dependency by improving the youths' capacity to obtain employment that leads to long-term financial self-sufficiency. This program serves youth ages 14 through 21 that are members of a family whose total family income is up to 300 percent of the federal poverty level. This program provides non-assistance.

### **Refugee Employment Programs**

Refugee Employment Programs provide employment and supportive services to families who hold a humanitarian immigrant status (refugees, asylees, certified Victims of Trafficking, Cuban-Haitian parolees, Amerasians, and Iraqi and Afghan Special Immigrant Visa holders). Services are designed to enable Employable Refugees to achieve economic self-sufficiency as soon as possible. Services include, but are not limited to job development, job placement, removal of employment barriers (such as childcare, transportation, limited English language proficiency, financial literacy, and unfamiliarity with U.S. work culture and customs), case management and follow-up after job placement. Certain Refugee Employment Programs also provide training that allows participants to attain job upgrades, or to return to their previous field of work. Services are available for up to 60 months following the date of eligible immigration status, and there is no income limit for program participation.

### **Informal Kinship Care Services**

These services are provided to children who live with their relatives through an informal arrangement made within the family. The child is not in the care, custody, or guardianship of the LDSS. Both the child and the relative caregivers receive informal kinship care support services including information and referral through local departments of social services and the Kinship Care Resource Center funded by the Department of Human Service and entities such as the Brookdale Foundation. The children's income must be within 300 percent of poverty. This program provides non-assistance.

### **Post Adoption Services**

Post Adoption Services provide supportive services to adoptive parents and children with income under 300 percent of the poverty level. Services provided include, but are not limited to: individual and group support, child or family mentoring, marriage support, information and referral, crisis intervention, community and recreational services, and educational support, such as tutoring and educational plan development. Benefits under this program meet the definition of

non-assistance under the TANF program. This program is reasonably calculated to meet the first goal of the TANF statute.

### **Independent Living Program**

The Independent Living Program is a part of a continuum of foster care services administered by the Social Services Administration and delivered by the 24 local departments of social services. The purposes of the program are to: (1) end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage; (2) prevent and reduce the incidence of out-of-wedlock pregnancies, and establish annual numerical goals for preventing and reducing the incidence of these pregnancies. The program provides a wide range of services designed to enable families to live independently. The goal of the program is to prepare older foster care youth for self-sufficiency by their 18th birthday or upon completion of high school. The youth may remain in foster care up to age 21 if in school, in training or disabled. Eligibility for this program's services is based on receipt of foster care maintenance payments paid to the kinship care family on behalf of the child and on assessment outcomes. The financial and eligibility criteria for the foster care maintenance payment are in the Code of Maryland Regulations at 07.02.11.26 and the schedules against which payments are measured are at 07.02.11.34. The program provides non-assistance.

### **Kinship/Foster Care Maintenance Payment**

This program serves children who are full time students, under age 19, who are not eligible for Foster Care IV-E (child welfare) funds and who can no longer reside in their home of origin because of abuse or neglect. These children were determined to be a Child in Need of Assistance through the court system, committed to a LDSS, and placed in the home of a relative. The targeted population is relative caregivers of needy children committed to a LDSS and the Child in Need of Assistance children living with that relative who is a licensed foster parent. The purpose of the program is to provide assistance to needy families so children may live with their relatives. Relative caregivers in this program are local department-approved foster parents of the kin child. The children for whom payment is made must have income below 300 percent of the poverty level. The complete financial and eligibility criteria for the foster care maintenance payment are in the Code of Maryland Regulations at 07.02.11.26 and the schedules against which payment is measured are at 07.02.11.34. Foster care maintenance payments are made to the caregiver on behalf of the child. This program provides assistance.

### **Local Programs Administered by the Local Departments of Social Services**

This include a wide variety of programs that have funds in them coming from a wide variety of sources, such as county and local governments, contributions from churches and other non-profit organizations, and philanthropic entities. Because of the nature and history of the service delivery system in Maryland, many of these groups view their LDSS as the best vehicle to deliver help to low-income families beyond that available through the principal programs administered by the Department. These programs are sometimes stand-alone and at other times supplement some of the programs mentioned elsewhere in this Plan.

They provide eligible families with income under 300 percent of the poverty level with the following kinds of services, which are all considered to be non-assistance for TANF purposes:

- Emergency Food Programs;

- Local supplemental funding for welfare to work programs, including funding for additional space, staff, services, etc.;
- Family Counseling;
- Emergency relief services to help families attain safe and affordable housing, which include the provision of emergency shelter, relocation assistance, homeownership counseling, home repairs, utility restoration, or shut-off prevention;
- Information and referral;
- Medical supplies and services, of an emergency nature, that are not covered by medical assistance or for those ineligible for medical assistance (Only State funds are used for costs associated with this program.);
- Substance Abuse Services;
- Family Support Services, which are primarily community-based preventive activities designed to promote parents' ability to successfully nurture their children; enable families to use other resources and opportunities available in the community; and, create supportive networks to enhance the child-rearing abilities of parents;
- Family Preservation Services that help families alleviate crises that might lead to the out-of-home placement of children; maintain the safety of children; support families preparing to reunite; and assist families in obtaining services and other supports necessary to address their needs. They include, but are not limited to parent skill training and crisis intervention services;
- Transportation to work, training, job interviews or to access other needed services;
- Clothing to replace that which is lost in an emergency, is needed for work preparation, or which the family cannot afford because of their present circumstances, which includes such disposable items as diapers;
- Domestic Violence programs that offer services to victims of domestic violence and their families. Services include, but are not limited to: safe accommodations for a period of less than four months, hotline counseling, advocacy accompaniment and abuser intervention;
- Boys Club/Girls Club support;
- After school programs;
- Screening for local department services; and,
- Grants to Food Bank Services.

### **Assistance to Individuals with Disabilities**

Maryland provides assistance to individuals and families with disabilities applying for or receiving TANF. Maryland: (1) ensures equal access to people with disabilities; (2) reasonably modifies policies, practices, and procedures for people with disabilities where necessary; and, (3) ensures that methods of administration do not discriminate on the basis of disability. Applicants and recipients are provided special accommodations and auxiliary aids, such as interpreters for the hearing impaired, large type reading materials for visually impaired, and telephone interviews for those customers whose impairment prevents them from coming into the Department of Social Services.

### **English Language Learners**

This program's services provide language and other services needed by families with LEP in applying for or receiving TANF or TANF-MOE funded benefits. Examples of services include,

but are not limited to interpreter services and English Language Acquisition classes. This program serves those with incomes under 300 percent of the federal poverty level and provides non-assistance.

### **Adoption Assistance**

Maryland provides adoption benefits that include a monthly payment and other non-financial services to needy parents of an adopted child who is not eligible for title IV-E (child welfare) adoption assistance. In this instance, the final adoption establishes a parental relationship even if no blood relationship exists. To qualify on the basis of income, the annual adjusted gross income, as defined by the Internal Revenue Service, of the adoptive family may not exceed 80 percent of the latest published figure for the median income for a family of that size for the State, as set forth in Schedule A under COMAR 07.02.04.11. The adoptive child is included in determining the family size. The annual adjusted gross income of the family shall be the latest figure that was reported to the Internal Revenue Service. This program provides assistance.

### **Electric Universal Service Program**

The Electric Universal Service Program is an affordable electric service program authorized under the Electric Customer Competition and Choice Act of 1999 to help low-income, needy families afford electric service in the deregulated environment and to have safe and reliable electric service. The program provides a one-time-only payment that targets the elderly, working poor, disabled and families with children. Eligibility is limited to families with income up to 175 percent of the federal poverty guidelines. The program provides non-assistance.

### **Refundable Earned Income Tax Credit Refunds**

The Earned Income Tax Credit Refund Program provides a state paid earned income credit that is refundable to eligible low-income taxpayers with one or more dependents. "Eligible low income taxpayer" means an individual, or an individual and individual's spouse if taxes are filed jointly, whose federal adjusted gross income does not exceed the applicable poverty income level and has applied for these benefits. The "applicable poverty income level" is defined as the amount specified in the poverty income standard that corresponds to the number of exemptions to which the taxpayer is entitled to claim. Poverty income standard means the most recent poverty income guidelines published by HHS, as of July 1 in the taxable year. The EIC can be claimed against State and local income tax. In addition, EIC Support Services include, but are not limited to, Volunteer Tax Preparation, Public Awareness Campaigns, and a 24-Hour Hot Line. The purpose is to increase the income levels in low-income families and end dependence of low-income, needy parents on government benefits by promoting job preparation, work and marriage. This program provides non-assistance.

### **Transportation Assistance Program**

The Transportation Assistance Program (TAP) empowers TCA families with financial challenges to achieve economic self-sufficiency and personal independence through car ownership. This program affords customers the ability to purchase a used Maryland state-inspected vehicle at or below the vehicle's market value through Vehicles for Change (VFC), a vendor that serves all of Maryland. FIA anticipates providing vehicles to 100-120 families per year at an estimated cost to FIA of \$4,000 per car. Each customer receiving a vehicle is

responsible for paying a flat fee of \$800 (the customer's portion of the vehicle's cost). The customer may pay part of the fee or the entire portion at the time of vehicle selection.

In order to be eligible for TAP, VFC applicants:

- Must be currently receiving TCA; or if no longer on TCA , must have been a TCA recipient within the last 12 months; or a youth aging out of foster care age 18-21; a current TCA-connected non-custodial parent or a non-custodial parent connected to a TCA case that has closed within the last 12 months
- Must be employed or have a verified job offer working an average of 30 hours per week or greater;
- Must have a valid Maryland Driver's License;
- Do not have access to any other vehicles in the household; and
- Does not have a driving while intoxicated (DWI) or driving under the influence (DUI) citation on his or her driving record.

## **PROGRAMS FUNDED BY SEGREGATED FEDERAL TANF FUNDS**

Maryland has developed a broad array of services to families and children that are reasonably calculated to accomplish the third and fourth purposes of the TANF law. These programs are not means tested (Maryland has designed these programs to be as effective and efficient as possible. This has the effect that certain specific services and/or beneficiaries of some of the services of some of these programs may not be eligible for federal TANF or MOE. Maryland will determine the exact amount using the appropriate federal mechanisms outlined it its Cost Allocation Plan.). These programs provide non-assistance.

### **Adolescent Pregnancy Prevention**

The Governor's Office for Children provides funding for initiatives and/or training throughout the State that focus on teen pregnancy prevention and/or intervention. The program's main goal is to prevent adolescent pregnancies, which will subsequently prevent and reduce the incidence of out-of-wedlock births. The program includes initiatives that provide parenting skills and promote responsible fatherhood. The program serves pre-adolescents, teenagers, parents, educators, and counselors, according to specific program criteria. This program provides non-assistance.

### **Maryland's Tomorrow**

Maryland's Tomorrow is a statewide dropout prevention program operating in 70 high schools across the State (all jurisdictions are covered) and 23 middle schools in nine jurisdictions. The purposes of the program are to: (1) prevent and reduce out-of-wedlock pregnancies and improve the self-esteem, attendance, school performance, promotion rate, and behavior of at-risk students in grades six through twelve; and, (2) to motivate them to succeed in high school, make wise career choices, and continue their education and training. Case managers visit elementary schools and identify students who meet at least one of the following criteria (there is no monetary criteria):

- Low achievement on standardized tests;
- Prior grade retention;

- Poor attendance; or
- A GPA of less than 2.0.

Programs are arranged during the summer between fifth and sixth grade. This approach is also used for eighth graders who are going into high school. Local school systems can choose different approaches. Services can include after school tutoring and computer assisted instruction, daily help with homework, student-operated businesses, jobs' in the school community, weekly service learning, wellness activities, rewards, and incentives. Activities may involve families, businesses and communities. This program provides non-assistance.

### **Home Visiting**

This program provides home visitation and on-site services to families, such as parenting education, family planning, and employment services. The program's main goal is to reduce subsequent out-of-wedlock pregnancies among participants through family planning counseling. The program serves clients over age sixteen who are expecting their first child. Both parents must be involved in this program, which is also designed to prevent intergenerational welfare dependency. This program provides non-assistance.

### **Family Support Center Network**

Family Support Centers were developed to establish preventive supports for families during the early formative years and to encourage the formation and maintenance of two-parent families. The Family Support Centers are community-based programs that provide services to assist mothers and/or fathers with children age birth to three, particularly those in high-risk communities, raise healthy children and build productive futures. Comprehensive services are provided either on-site or through referral, and existing programs coordinate to benefit mothers and/or fathers and their children, and develop new resources to satisfy unmet needs. Services include parenting skills, outreach, peer support and recreational activities, infant and child stimulation, employability and literacy opportunities, health education, and referral for services. This program also includes services developed using this same, successful model. For example, the Family League of Baltimore has also developed a similar set of services based on this Family Support Center Model called "Success by Six," which also includes home visitors, many of whom are former TCA recipients.

There is no income criteria required to participate in the Family Support Center program, although a significant number of participants receive TCA. Others may need cash assistance, but choose not to receive TCA. There are also participants who are financially capable of attending to their basic daily life needs, but need Family Support Center services to enhance their parenting skills. The objective is to develop a cadre of services appropriate for each family. This program provides non-assistance.

### **Collaborative Supervision and Focused Enforcement Initiative**

The Collaborative Supervision and Focused Enforcement initiative is a statewide crime reduction strategy that promotes locally based, comprehensive planning in high-crime at-risk neighborhoods for youth and adults. The program is based on strategies implemented by neighborhoods and nonprofit advocacy groups that are successful in collaborating and engaging key community leaders in solving problems in the community. The program aims to develop

locally based strategies to respond to the problems that interact at the neighborhood level and bring the justice system to the community, as opposed to bringing the community to the justice system. Many of the strategies include an after school program. These strategies are designed to enhance the motivation, performance, and self-esteem of youth and are thus reasonably calculated to achieve the third goal of the TANF law, the reduction of out of wedlock pregnancies.

The overall goal for the initiative is a 25 to 35 percent reduction in serious crime and quality-of-life improvements in communities that implement the comprehensive strategy. Each participating community surveys residents to measure whether there are improvements in the quality of life and changes in their sense of hopefulness and ability to make a difference. The program seeks to involve youth, as much as possible, in all phases of planning and implementation. This program provides non-assistance.

### **Project Retain**

This project supports welfare reform efforts in Maryland by assisting former and current TANF customers. Project Retain supports welfare reform and workforce development efforts in Maryland in two ways. First, the project enhances staff capacity in local departments by providing skills training on post-employment retention and advancement strategies to avoid high welfare recidivism rates for employed former and current customers. High-performance customer service also requires staff to learn about the career path for higher paying jobs and employers. Secondly, Project Retain assists employed customers with solving problems, removing barriers or resolving issues that place them at risk of termination or self-termination from employment. Project Retain services help TCA customers retain employment, work toward job advancement, and achieve and sustain self-sufficiency. These efforts reduce welfare rolls and interrupt the cycle of dependency. Additionally, Project Retain provides training to local departments of social services to build staff capacity. The training is conducted by internal staff, resulting in cost savings to local departments that would otherwise have to use outside contracts for retention and advancement services. This program provides non-assistance and is reasonably calculated to accomplish TANF purpose four.

### **Responsible Choices Projects**

Responsible Choices Projects work with middle school age adolescents and high school age teens to promote abstinence. Of note is the Best Friends Program, which enlists peer support. Special efforts are also made to work with first-time teen parents, age 16 and older, in an effort to reduce the incidence of subsequent non-marital births using the Healthy Families America home visitation model. These programs provide non-assistance.

### **Maryland Fatherhood/Motherhood Initiative**

This initiative builds on Maryland's highly successful individually focused, location specific welfare to work program to serve the non-custodial parents of TCA children eligible either at present or in the past 12 months, or who owe a TCA related arrearage to the State. By supplementing existing welfare to work strategies and contracts for this population, this initiative is able to make the best use of limited resources to achieve, among other things, employment of the non-custodial parent, payment of child support, decreased recidivism if previously

incarcerated, and engagement in the Department's other Healthy Marriage/Healthy Families initiatives. This program provides non-assistance.

### **The Offender Workforce Transition Initiative**

The Offender Workforce Transition Initiative prepares and supports inmates' efforts to re-integrate into the community, become productive wage earners, and lead personally satisfying and fulfilling lives. Collaboration with various federal, state, local, business, and community partners ensures that soon to be released inmates have the necessary career training, work habits, teamwork, conflict resolution skills, and interview techniques that will enable them to land and keep good jobs with a self-sustaining salary. Workforce development professionals and career development facilitators work with individuals on financial literacy and communication strategies. They support efforts to re-unify family members and encourage custodial and non-custodial parents to be "responsible" parents. Staff works with recommended offenders until job placement occurs and continues with post-employment follow-up. The goal is to encourage the ex-offenders' adjustment to living and working in a non-restrictive environment and to be competitively employed in an economically viable career pathway. The initiative reduces inmate recidivism and supports the formulation and maintenance of two-parent families. This program provides non-assistance.

### **Block Grant Programs**

Maryland provides an extensive array of services to families and children under its Social Services Block Grant, Community Action Block Grant, Title IV-B State Plan, the Child and Maternal Health Block Grant, and the Substance Abuse and Mental Health Block Grant plans that are reasonably calculated to accomplish the third and fourth purposes of TANF. To the extent that the State expends state or local funds on these services that exceed available block grant funds, the State reserves the option to use TANF funds or TANF-MOE as appropriate and reported in the State's fiscal reports subject to federal limitations. The funds claimed for these will be for non-assistance.

### **Maryland Higher Education Commission scholarship programs**

These scholarships are eligible for TANF funding because post-secondary educational attainment by State residents decreases the incidence of out-of-wedlock births by raising the "opportunity cost" of having children outside of marriage. Studies also show that professional careers (often the product of higher education) delay fertility. These programs provide non-assistance.

## **PROGRAMS FUNDED BY COMMINGLED FUNDS**

Maryland has developed a broad array of services for families and children that are reasonably calculated to accomplish the third and fourth purposes of the TANF law. The changes brought by the Deficit Reduction Act of 2005 allow these programs to be funded with federal TANF dollars or count toward the State's MOE requirement. Maryland has designed these programs to be as effective and efficient as possible. This has the effect that certain specific services and/or beneficiaries of some of the services of some of these programs may not be eligible for federal TANF or MOE. Maryland will determine the exact amount using the appropriate federal mechanisms outlined in its Cost Allocation Plan. These programs provide non-assistance.

## **Means Tested Programs**

### **Child First Authority Extended School Day Programs**

This program provides extended school day activities from 3–6 p.m. to 1,100 children of low income families in ten Baltimore City public elementary/middle schools – 98 percent of the schools' student population is eligible for free or reduced lunch. The eligibility standard is 300 percent of the federal poverty level. Teachers and/or school principals in participating schools can refer a child to Child First Authority if the child is determined to be at risk of poor school performance and/or attendance. All parents of participating children must actively participate in nine hours of Child First Authority sponsored training or activities each school year.

The extended school day enriches children's lives and enables parents to work or attend school. Child First Authority programs focus on safety, self-esteem, motivation, performance, character development, and educational enrichment. Child First Authority programs provide additional educational experiences by conducting sessions in art, music, dance, history, reading, writing, and math. Many of the participating schools do not have "arts" activities as a part of their curriculum. The Annenberg Institute chose Child First Authority as one of nine successful initiatives nationally for School Reform. Child First Authority partners include the Maryland Historical Society, Maryland Institute of Art, numerous faith organizations, and parent volunteers. The purpose of the program is to enhance the motivation, performance, and self-esteem of youth and is thus reasonably calculated to achieve the third goal of the TANF law, the reduction of out of wedlock pregnancies. This program is not in any way a component of Maryland's system of free public schools. This program provides non-assistance.

### **Substance Abuse Treatment and Services Program**

The Welfare Innovation Act of 2000 and HB 1024 of the 2005 Session of the Maryland General Assembly required the hiring and placement of addictions specialists in local departments of social services to conduct screening, testing, assessments, referrals, and reporting for TCA adults and minor parents, and certain Food Supplement Program applicants and recipients (custodial and non-custodial parents who are convicted drug felons). The program requirements and possible sanctions for TCA adults and minor parents are mentioned above as part of the Family Investment Program Core Components. This program provides non-assistance to TANF eligible individuals and certain Food Supplement Program applicants and recipients whose income is less than 130 percent of the Federal Poverty Level.

### **After School Programs**

The basic after school program is available statewide for school age children in families at or below 300 percent of poverty. This also includes local programs that provide the same or similar services. Vendors chosen to operate within the statewide program must incorporate features that will have a positive measurable impact on one or more of the conditions of well-being for children and youth identified by a report of Maryland results and indicators of child wellbeing. One of the results and indicators is "Babies Born Healthy," which includes a measure for "the rate of births to adolescents less than 18 years of age." Another is "Stable and Economically Self-Sufficient Families," which includes a measure of "the percent of single parent households."

Additionally, local providers offer a variety of after school opportunities to Maryland's youth using their own or combinations of State and local funds. Programs include those housed in local schools that have an academic focus in addition to traditional recreation programs and those based in the community, in a church, recreation center or similar facility, which stress academics, recreation, and artistic skill development equally as well as programs providing skill development activities around a particular artistic activity. Some pair older youth in a tutoring relationship with younger youth, an experience geared to preparation for the work world. Outcomes sought by these activities include: increased school attendance, increased school achievement, reduction in delinquent behavior, reduction in substance abuse, and reduction in teen pregnancy. Therefore, this program is reasonably calculated to achieve purposes three and four of the TANF statute. This program provides non-assistance.

### **Howard P. Rawlings Program of Educational Excellence Awards**

The State funds two need-based scholarships under this program: (1) the Guaranteed Access Program; and, (2) the Educational Assistance Grant. The Guaranteed Access Program is open to current high school seniors who will complete a college preparatory program or a student who graduated prior to the current academic year who provides written documentation explaining why they were unable to attend college within one year of graduating from high school. The income scale for the Guaranteed Access Grant program is below and annual updates can be found at: [http://www.mhec.maryland.gov/financialAid/ProgramDescriptions/prog\\_ga.asp](http://www.mhec.maryland.gov/financialAid/ProgramDescriptions/prog_ga.asp).

<b>2018-2019 Guaranteed Access Grant: Family Income Requirements</b>		
<b>Family Size</b>	<b>130% of Poverty Level (New)</b>	<b>150% of Poverty Level (Renewal)</b>
<b>1</b>	<b>\$15,678</b>	<b>\$18,090</b>
<b>2</b>	<b>\$21,112</b>	<b>\$24,360</b>
<b>3</b>	<b>\$26,546</b>	<b>\$30,630</b>
<b>4</b>	<b>\$31,980</b>	<b>\$36,900</b>
<b>5</b>	<b>\$37,414</b>	<b>\$43,170</b>
<b>6</b>	<b>\$42,848</b>	<b>\$49,440</b>
<b>7</b>	<b>\$48,282</b>	<b>\$55,710</b>
<b>8</b>	<b>\$53,716</b>	<b>\$61,980</b>
<b>Each additional person</b>	<b>\$5,434</b>	<b>\$6,270</b>

The Educational Assistance Grant is open to Maryland residents who are full time undergraduate students. The awards are based on a financial need formula that relies on the Free Application for Federal Student Aid (FAFSA). An Educational Assistance Grant is determined by student need. Need for an Educational Assistance Grant is determined using the following formula:

- College Cost of Attendance
- Expected Family Contribution + or – Regional Cost Of Living Adjustment
- Certain State scholarship awards (if awarded)
- Federal Pell Grant (if eligible)
- = Financial Need

Both types of Rawlings scholarships provide non-assistance.

### **Programs Funded and Administered by Entities Other than the Local Departments of Social Services**

This may include a wide variety of programs in receipt of funds from a wide variety of sources, such as county and local governments, contributions from churches and other non-profit organizations, and philanthropic entities. In accordance with Policy Announcement TANF-ACF-PA-2004-01, the State will claim as MOE only those expenditures made under agreements between the State and these third party entities that permit the State to count those expenditures toward its MOE requirement. These programs provide eligible families under 300 percent of the poverty level, with the following kinds of services which are all non-assistance for TANF purposes:

- Emergency Food Programs;
- Local supplemental funding for welfare to work programs, including funding for additional space, staff, services etc.;
- Family Counseling;
- Emergency relief services to help families attain safe and affordable housing, which include the provision of emergency shelter, relocation assistance, homeownership counseling, home repairs, utility restoration, or shut-off prevention;
- Information and referral;
- Medical supplies and services, of an emergency nature that are not covered by medical assistance or for those ineligible for medical assistance (Only State funds are used for costs associated with this program.);
- Substance Abuse Services;
- Family Support Services, which are primarily community-based preventive activities designed to: promote parents' ability to successfully nurture their children; enable families to use other resources and opportunities available in the community; and, create supportive networks to enhance the child-rearing abilities of parents;
- Family Preservation Services that help families alleviate crises that might lead to the out-of-home placement of children; maintain the safety of children; support families preparing to reunite; and assist families in obtaining services and other supports necessary to address their needs. They include but are not limited to parent skill training and crisis intervention services;
- Transportation to work, training, job interviews, or to access other needed services;
- Clothing to replace that which was lost in an emergency, is needed for work preparation, or which the family cannot afford because of their present circumstances, which includes such disposable items as diapers;
- Domestic Violence programs that offer services to victims of domestic violence and their families. Services include but are not limited to safe accommodations, hotline counseling, advocacy accompaniment, and abuser intervention;
- Boys Club/Girls Club support;
- After school programs;
- Screening for local department services;
- Grants to Food Banks; and,
- Food Bank Services.

## **Non–Means Tested Programs**

### **Responsible Fathers Programs**

These programs provide services to custodial and non–custodial fathers such as parenting education, family planning, GED® instruction, job training, employment– search assistance, and self–esteem building. Sites throughout the State serve young fathers, age 16+, who have one or more children. The program’s main goal is to reduce subsequent out–of– wedlock pregnancies among participants through family–planning counseling. Program objectives seek to increase parent–child interaction, emotional support, financial responsibility and the development of two parent families.

These programs also encourage co-parenting for non–custodial fathers. Although participation in the program is voluntary, participants are required to comply with Child Support Enforcement, if not currently doing so. Programs serve fathers who are initially unemployed. Though not a requirement of program enrollment, participant referrals are actively solicited from local departments of social services’ TCA and child support enforcement rolls. This program provides non–assistance.

### **The Maryland Healthy Marriage / Healthy Families Initiative**

This initiative recognizes that children are more likely to thrive in the context of a two–parent family. The Maryland Healthy Marriage / Healthy Families Initiative has been established as the umbrella for several family focused programs. The purpose of the initiative is to build the capacity of participants, so that they are prepared for the responsibilities of parenting and marriage, and ultimately to enhance the lives of their children. The family focused programs target mothers, fathers, and youth, providing a continuum of services to strengthen and empower families. The programs include fatherhood and non–marital birth reduction initiatives and a marriage preparation curriculum.

The Maryland Healthy Marriage / Healthy Families Initiative focuses primarily on expectant and never married parents and fragile families in need of support services. The initiative connects participants with resources, information and services to strengthen and empower families. Some of the services offered include parenting skills enhancement, educational activities, employment development, job search and support, counseling, and anger management. The services are provided through a network of social service systems, educational systems, and community and faith based organizations. This program provides non–assistance.

### **The Responsible Fathers, Healthy Marriage and Healthy Families Programs**

These programs include activities that are enumerated in sections 403(a)(2)(A)(iii) and 403(a)(2)(C)(ii) of the Social Security Act. States may claim these pro–family expenditures for non–assistance benefits provided to or on behalf of an individual or family as MOE, regardless of financial need or family composition, unless a limitation, restriction or prohibition under 45 CFR 263 Subpart A applies.

There are instances when the following programs that are not means tested serve eligible families. The State will count these expenditures for services received by needy families as

TANF-MOE expenditures only when an audit trail can be established that links the non-means tested service to needy families.

One example is when a program supplies an enrollment list and it is matched to the TCA caseload. If the list shows that five percent of families served were needy, then five percent of the non-federal expenditures for that FY may be claimed as TANF-MOE.

The following commingled funded programs will use this or a similar methodology if TANF-MOE expenditures are claimed.

### **Community Partnerships**

These programs are locally defined and based on indicated needs to help families by providing family support through projects such as home visiting, after school programs and family preservation. The program objectives seek to reduce out-of-wedlock pregnancies, increase parent-child interaction, emotional support, and financial responsibility, and promote the development of two parent families. This program provides non-assistance.

### **Safe and Stable Families**

These are a variety of programs available to families to provide supportive services to promote safety and well-being of children and their families, promote stability and permanency, preserve family unity, and build empowerment, self-sufficiency and psychosocial well-being. This includes families with identified stresses around family life, including disruption, child abuse and neglect issues, domestic violence, homelessness, substance abuse, mental health, physical health, and educational concerns. These programs help families by providing: protective services or potential protective services to families; family support through projects such as parenting classes and after school programs; and family preservation, through grants for Interagency Family Preservation Services and through other means as appropriate, such as by counseling families in crisis, referring them to other existing services, and providing a wide range of service to the family to maximize the chances the children grow up in safe, stable and loving homes. The programs include, but are not limited to, Families Now, Intensive Family Services, Continuing Protective Services, Services to Families with Children, Kinship Care, Parent Aide Services and those provided through Inter-Agency Agreements such as the Family Recovery Program. These programs prevent or reduce out-of-wedlock pregnancies and encourage the formation and maintenance of two parent families, since the ultimate goal of all of them is to provide a safe home for children in a stable, two-parent environment. These programs provide non-assistance.

### **Baltimore City Public Schools After-School Program**

In an agreement between State and City officials, the Maryland After-School Opportunity Fund Program was expanded for Baltimore City. As required by legislation, vendors chosen to operate the program must incorporate features that "will have a positive measurable impact on one or more of the conditions of well-being for Maryland children and youth identified by the Maryland Partnership for Children, Youth and Families." The Maryland Partnership for Children, Youth and Families has developed results and indicators of child wellbeing with assistance from the U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation.

One of the results and indicators is “Babies Born Healthy,” which includes a measure for “the rate of births to adolescents less than 18 years of age.” The programs support the Baltimore City Public Schools’ efforts to provide quality after school experiences for at risk students enrolled in the City’s public schools. Programs are designed to help children succeed in school, increase positive and healthy behaviors, and decrease negative behaviors such as juvenile crime, substance abuse, and teen pregnancy. This program provides supervision and activities for children of many low-income families and is reasonably calculated to achieve the third goal of the TANF statute. This program provides non-assistance.

### **Juvenile Delinquency Prevention and Diversion Initiative**

This initiative provides community based, multi-service prevention programs serving youth and families. Sites are incorporated non-profits with a Board of Directors, local governments, or state government. The youth served are those at risk of becoming delinquent because of their behaviors and circumstances, and youth who committed minor delinquencies. Referrals are accepted from schools, parents, the Department of Juvenile Justice, police, the juvenile him or herself, other agencies, and friends. The purpose of the program is to enhance the motivation, performance and self-esteem of youth and is, thus, reasonably calculated to achieve the third goal of the TANF law, the reduction of out of wedlock pregnancies. This program provides non-assistance.

### **Enhancement Grants for Local School Systems**

These grants help local school systems provide full day, all year, early childcare and educational programs. Funds can be used to: provide before and after care services for public schools, preschools, pre-kindergarten or kindergarten programs; increase the number of child care programs that are open full day and year round; expand services to half day programs; and provide family support programs promoting parental involvement. This program provides education and supervision for children of eligible families under 300 percent of the poverty level and promotes parental involvement in their children’s learning. The program is reasonably calculated to achieve the first and second goals of the TANF statute. The program provides non-assistance.

Maryland will apply the following methodology for any MOE funds claimed from this program. An enrollment list from the program will be matched to the TCA caseload. If the list shows that X percent of families served were needy, then X percent of the non-federal expenditures for that FY may be claimed as TANF-MOE.

### **Department of Juvenile Services Programs that are TANF or TANF-MOE Eligible**

Department of Juvenile Services Programs may be TANF or TANF-MOE eligible when serving families and children in the community related to Purpose Four of TANF. Among them are community services programs such as Drug Courts for youth, Functional Family Therapy, and Multi-systemic Therapy. The latter two are evidenced-based, family focused interventions that are designed to improve family interaction and prevent re-arrest. Certain services offered by the Department of Juvenile Services residential facilities also serve families.

Families are encouraged to participate in the treatment programs. One initiative, the After Care Program, offers behavioral health professionals that develop aftercare plans that link youth and

their families with appropriate services once they return to the community. Families are encouraged to participate in aftercare planning while youth are in the facilities. These programs provide non-assistance. MSDE Programs funded under the Bridge to Excellence Act The Bridge to Excellence Act is an “umbrella” funding mechanism that provides aid to local school districts for a variety of educational enhancements. A number of the funding streams within the Act can be TANF or TANF-MOE eligible, either for enhanced funding for schools in low income areas or for services to specific low-income populations. These programs provide non-assistance.

## **SEPARATE STATE PROGRAMS FUNDED BY 100% TANF MAINTENANCE OF EFFORT**

Maryland has developed a broad array of services to families and children that are reasonably calculated to accomplish the first and second purposes of the TANF law. These are means tested and are funded out of 100 percent TANF Maintenance of Effort funds in a Separate State Program or other sources that are not federal TANF or TANF Maintenance of Effort. Maryland has designed these programs to be as effective and efficient as possible. This has the effect that certain specific services and certain specific beneficiaries of some of the services of some of these programs may not be eligible for federal TANF or that Maryland will not find it necessary to claim all of the TANF funds that could be claimed for the program because of its own substantial investment in it.

Using the flexibility in the statute and regulations, Maryland will report the exact amount of state funds for MOE charged to these programs using the appropriate federal mechanisms. Unless otherwise noted, for the purposes of this Plan and federal reporting, eligibility for the following programs is limited to those families with incomes under 300 percent of the federal poverty level in effect at the time of service delivery.

### **Rental Assistance Program to Work**

The Rental Assistance Program to Work provides rental assistance to families currently receiving TCA, former TCA families who received TCA in the past year, and families who received a Welfare Avoidance Grant and who are employed or unemployed and in a work activity (as defined by the LDSS). The families receive assistance from the Rental Assistance Program for up to 12 months. Six-month extensions may be granted if customers provide reasonable explanations of why they are not becoming self-sufficient. Eligibility is limited to families who receive income that is 30 percent or less than the statewide or area median income. Rental assistance provides reasonable, stable housing to keep families working, enhance family income, and keep the family off TCA. In addition, rental assistance provides stable, low-cost housing to TCA families preparing for work or working at a low-wage job that will eventually move off TCA. This program provides assistance.

### **Judith P. Hoyer Early Child Care and Family Education Centers (Judy Centers)**

Judy Centers are unique early childhood learning centers that promote school readiness through an integrated approach. The centers, written into Maryland Law in May 2000, envision professional collaboration in integrating a wide spectrum of early childhood education programs and family support services for children from pre-birth to age six. The centers have a “one stop” approach eliminating fragmented services. Children and their families can visit a single location

to access community-based organizations providing services such as health services, family support and family literacy, Head Start and the public library. The community-based services are in addition to the services provided by the Center, such as: early intervention services, health care (immunizations, vision and hearing tests, and pediatric care), professional family support, and student breakfast and lunch. This program encourages eligible families with incomes under 300 percent of poverty to obtain the services they need to ensure their children are healthy and successful in school by making the services easily accessible. The program is reasonably calculated to achieve the first and second purposes of the TANF statute. The program provides non-assistance.

### **Adoption Benefits Funds**

This provides funds for adoption benefits to needy parents of an adopted child who is not eligible for title IV-E adoption assistance. Families are eligible if their annual adjusted gross income, as defined by the Internal Revenue Service, does not exceed 80 percent of the latest published figure for the median income for a family of that size for the State, as set forth in Schedule A under COMAR 07.02.04.11. The adoptive child is included in determining the family size. The annual adjusted gross income of the family shall be the latest figure that was reported to the Internal Revenue Service. Funds are available to pay for benefit payments. The final adoption establishes a parental relationship even if no blood relationship exists. This program is reasonably calculated to meet the first goal of the TANF statute. Benefits under this program meet the definition of assistance under the TANF program.

(b) Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)

Each adult in the TCA assistance unit and each child age 16 years or older in the assistance unit who is not enrolled full-time in school must participate in a work activity approved by the local department that is likely to result in unsubsidized employment. Local departments follow the 12 approved core and non-core work activities set forth by the law (The participation requirement is based on immediate universal engagement and is compliant with the 24 month work rule found in §402(a)(1) A (ii) of the TANF law.).

Exemptions from the work activity requirements are:

- A single custodial parent who is required to care for a child under age one who is a member of the assistance unit (This exemption applies for a cumulative total of 12 months for a parent's lifetime) Children under age 16.
- A teen parent (either head of household or included as a child on an adult's TCA case) who has not finished secondary school may not be exempt to care for a child younger than one year old.
- A caretaker relative in an assistance unit with a child cared for by a non-parent relative who has demonstrated need and has no dependent children of his or her own in the assistance unit.
- An Immigrant parent or caretaker relative who is not eligible for federal TCA assistance.

Failure of any non-exempt adult to cooperate in a work requirement without good cause, including failure to accept offered employment, shall result in ineligibility of the entire assistance unit until the household cooperates.

(c) Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance.

To ensure that individuals receiving assistance are engaging in work, there is a sanctioning process in place for noncompliance. Refer to Section (a), on page 233, Sanctions for Noncompliance with Program Requirements. Also Section (a), page 224 refer to the TANF Workforce Development Programs description that discusses how LDSS workforce development activities are addressing employment and training services for individuals receiving assistance.

(d) Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)

To restrict the use and disclosure of information, the Secretary of DHS and the Executive Director of the FIA, or their designees, develop partnership agreements for the exchange of information to assist in the verification of cash assistance eligibility. The agreements are in writing and include procedures for requesting, obtaining, and examining the information, and specify the Secretary's designee for requesting and receiving information by title or position. Additionally, customers sign a consent form to share information needed for the verification of cash assistance eligibility. The State of Maryland elects the option to collect data on a monthly basis and report on a quarterly basis, a sample of the caseload as prescribed by the Secretary, to produce statistically valid estimates of the performance of the program. Sampling will be used only when the universe is large enough to comply with established sampling methodology.

(e) Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)

The State of Maryland developed a comprehensive approach to the adolescent pregnancy problem including:

- Improvements in education, such as providing sexuality education, access to contraceptives and other health promotion services to reach out-of-school adolescents;
- Community based programs, such as local multimedia promotion of responsible decision-making on sexual matters;
- Enhanced social services, such as physical and sexual abuse prevention at primary, secondary and tertiary levels;
- Employment development, such as school-to-work opportunities in partnership with private business and public agencies; and,

- Health initiatives, such as improved access to birth control counseling and services for sexually active adolescents and parenting classes for every pregnant teenager and her partner. Programs and services for people in this age group will be improved or added, as needed.

(f) Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)

The State of Maryland recognizes that effective campaigns to reduce incidences of statutory rape are needed. Both the Maryland Department of Health and the MSDE developed and implemented programs targeted to reducing teen pregnancy. The Statewide comprehensive plan includes the following:

- An awareness campaign targeted to reach the male population that is likely to commit these crimes;
- A program of education/training for law enforcement officials;
- A plan that increases awareness through public schools; and,
- Enhancement of existing programs that provide counseling to both adolescent females and males. Maryland supports agencies and community groups that serve high risk populations that are in need of abstinence education.

The goal is to prevent unintended pregnancy and sexually transmitted infections (STIs), including HIV/AIDS in youth ages 10–19 who meet the following criteria:

- Live in geographic areas with high teen birth rates;
- Youth in or aging out of foster care or the juvenile justice system;
- Homeless, runaway, or Out-of-School Youth;
- Pregnant or parenting youth; and,
- Youth with HIV/AIDS.

As part of the State's campaign to reduce infant mortality, the reduction of teen pregnancy means fewer infants are born who might die before they reach one year old. The goal is to reduce infant mortality by ten percent by the end of calendar year 2017.

(g) Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)

Maryland's DHS operates an electronic benefits transfer system under agreement with the United States Department of Health and Human Services and pursuant to United States Department of Agriculture regulations. A TCA grant is typically paid via the electronic benefits transfer system. The Middle Class Tax Relief and Job Creation Act of 2012 (P.L. 112–96), provides that

individuals and families who are receiving federally funded cash assistance may not use an electronic benefits transfer card for any purpose at a liquor store, adult entertainment venue, or gambling casino.

The State of Maryland provides penalties for non-compliance with program requirements that include the suspension of the use of the cash access portion of the card for specific time periods. Effective October 1, 2014, all TCA applicants and recipients are required to sign an acknowledgement that they understand the prohibition against using their electronic benefits transfer cards at an establishment whose primary purpose is gambling, the sale of liquor, or an adult entertainment venue where individuals or groups disrobe for an audience.

Customers who violate the prohibition against using their cards at unauthorized locations will receive a warning notice that a subsequent violation may result in the use of their electronic benefits transfer cards for cash assistance benefits being suspended. Customers who have twice violated Federal law and State policy prohibiting the use of EBT cards at unauthorized locations will no longer have their cash assistance payments put onto their electronic benefits transfer cards. While the cards will still be active for use at Food Supplement Program retailers for those recipients, DHS will deliver cash assistance payments by direct deposit, or check. Suspension of the card for cash benefits is for a minimum of one year for the second violation and permanently for a subsequent violation after electronic benefits transfer use has been reinstated.

(h) Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

Individuals and families may incur fees and charges when withdrawing funds from ATMs that are not in the State vendor's network. DHS will provide customers with recommendations on how to access funds in a way that minimizes ATM fees or additional surcharges, such as using ATMs that do not charge a usage fee, or using the ATMs from the State vendor who manages the electronic benefits transfer funds accounts. DHS will continue to explore additional methods of reducing fees for customers and provide them with notifications via the DHS website where a link to the information will be available. In addition, information will be provided in the local departments of social services. If families or individuals are unable to access TCA benefits due to card restrictions, DHS will advise them of other payment options available including mailing a paper check or direct deposit into the customer's checking or savings account.

(i) Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)

Families moving into Maryland from another state will be treated no differently than any other family residing in Maryland. The number of months of TANF used by residents of another state who move to Maryland will be counted in the number of months of TCA received.

(j) Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

DHS's Citizenship Status policy for the Family Investment Program states that a Family Investment Program recipient must be a United States citizen or a qualified alien as defined in §8 USC 1611, et. seq., as amended. Qualified immigrants, including humanitarian entrants such as refugees, certified Victims of trafficking, Cuban and Haitian parolees, and asylees, who meet the federal technical and financial TCA eligibility requirements, may be referred to one or more of the following Family Investment Program components when applying for assistance:

- Welfare Avoidance Grant;
- TCA;
- Emergency Assistance to Families with Children; and/or,
- Disaster Assistance.

Local Departments may develop Alternative Programs tailored to fit the unique needs of that jurisdiction. To assist English Language Learners in meeting the TCA work requirements, DHS contracts with , the International Rescue Committee (IRC) which is qualified to implement TANF/workforce programs for humanitarian immigrants.

(k) Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)

Refer to Section (a) for a description of Maryland's delivery of benefits and the determination of benefits eligibility. Regarding fair and equitable treatment, Maryland uses a combined application and thus follows the guidelines established by the U.S. Department of Health and Human Services and the U.S. Department of Agriculture. The local departments of social services, all vendors and contractors must also follow State and federal non-discrimination requirements. The local departments will provide persons with disabilities individualized treatment and effective and meaningful opportunity to educational or employment activities as they are provided to others. The local department will make reasonable accommodations and provide auxiliary aids for persons with disabilities, such as but not limited to: interpreters, note takers, and materials in alternate formats to the extent that it does not cause a fundamental alteration with the program, or result in undue financial or administrative burden.

Appeals and Complaints of Discrimination— A Family Investment Program applicant or recipient may request an agency conference for an explanation of the reasons for proposed actions, and present information to show that the proposed action is incorrect. The local department gives each applicant or recipient written notification of the right to and procedures for requesting and obtaining a hearing as set forth in Code of Maryland Regulations 07.03.03.28 or 07.01.04. An applicant or recipient may file a written complaint by contacting the U.S. Department of Health and Human Services. The complaint must set forth the events and circumstances of alleged discrimination, if he or she thinks that DHS or LDSS has discriminated against them. Non-

**Discrimination Assurances** –The State of Maryland assures that the following provisions of law will apply to programs and activities funded under TANF:

- The Age Discrimination Act of 1975 (42 U.S.C. §§ 6101 et seq.);
- Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794);
- The Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12101 et seq.); and,
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d et seq.)

The State of Maryland assures that persons with disabilities will be provided with individualized treatment and effective and meaningful opportunity to the extent that it does not cause a fundamental alteration with the program or result in undue financial or administrative burden.

(l) Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

- providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or
- in other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

As a WIOA Partner, DHS is connected with the State's workforce system to stay informed about high-demand occupations. DHS accomplishes this in these ways:

- DHS's Secretary serves on the GWDB (GWIB). This access to the GWIB provides DHS with knowledge about high-demand occupations, industry sector initiatives; and business workforce development needs;
- DHS's Bureau of Workforce Development has a team member that is tasked with business engagement through DHS's Hiring Agreements program, for both private and public employers. Companies contracted to provide services or goods to the State are required to sign Hiring Agreements which declare DHS as the “first source” in filling positions that may be created as a result of the contract. Further, companies work with DHS to develop specific training to equip eligible TCA customers to fill vacancies. In addition, this team member works closely with the WIOA Partners statewide business services team, thus integrating into the larger workforce development system's team that addresses business workforce development needs; and,
- The local department staff that work with businesses to place TCA customers in employment, internships or on-the-job training opportunities are also connected to the WIOA Partners business services teams. This creates a coordinated and integrated system of business engagement. Additionally, the local department staff will begin taking advantage of the quarterly WIOA Partners business services training. Additionally, some local departments have contracts and MOUs with local community colleges to assist customers with vocational skills training and credentialing programs that will allow them to obtain employment at wages that will support their families. These programs include training in the healthcare related field, such as CNA, GNA, Medical Billing and Coding. The current demand for skilled workers in these positions is high. These positions will increase in demand as the population of “baby boomers” continues to age. The State will

continue to support training for careers in elder care, as well as provide job search and job placement assistance for careers in the elder care field.

(m) Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

Refer to Section (a) for detailed descriptions of MOE-funded services.

## **TANF OPTIONS SELECTED**

Maryland has opted for the following:

- The option to assist all legal immigrants who lived in the U.S. before August 22, 1996 in the same way U.S. citizens are treated;
- In 2000, the Maryland General Assembly chose to opt out of the PRWORA Section 115 requirement to disqualify custodial parents convicted of a drug-related felony involving possession, use, or distribution of a controlled substance on or after August 22, 1996 from receiving TCA or Food Supplement Program benefits. Mandatory and recurrent drug testing is a condition for receiving TCA and Food Supplement Program benefits for these custodial parents. The Department developed regulations in consultation with the Department of Health regarding testing methods and intervals.
- The option to not require an individual who is a single custodial parent caring for a child who has not attained 12 months of age to engage in work.
- The option to disregard the single custodial parent exempt from work due to caring for a child under the age of 12 months in determining the participation rates for work requirements for not more than 12 months.
- The option to terminate assistance to a family where an individual receiving assistance refuses to engage in work requirements, subject to good cause.
- The option to deny assistance to a family where an individual is not cooperating with the establishment of paternity or obtaining child support.
- The option to exempt from the 60 month limitation a family by reason of hardship, not to exceed a total of 20 percent of the average monthly number of families to which assistance is provided.
- The option to continue assistance for a child absent from the home fewer than 180 consecutive days.
- The option to develop a family responsibility plan. The plan sets forth an employment goal and a plan for moving the individual into employment, sets forth the obligations of the individual which may include a requirement to attend school, keep school aged children in school, immunize children, attend parenting and money management classes, set other requirements which will result in unsubsidized employment, and describe the services the State will provide to assist the individual to attain self-sufficiency.

- The option to comply with the above option within 180 days after the effective date of this part for a recipient of assistance, and within 90 days after the effective date of this part after the individual is determined to be eligible for assistance.
- The option to apply a full-family sanction to a family that includes an individual who fails, without good cause, to meet the individual responsibility plan.
- The option to use a sampling method using the procedures the Secretary deems to be necessary to produce statistically valid estimates of the performance of State programs funded under this part.
- The option to sanction a family that fails to ensure that minor dependent school-age children attend school and minor dependent pre-school children get preventive health care.
- The option to screen and identify victims of domestic violence. Refer such individuals to counseling and supportive services. Waive, pursuant to a determination of good cause, other program requirements outlined in Section 402 (a), (7), (A), (I), (ii), and (iii) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.
- The option to exempt a family from the 60 month limitation when a family includes an individual who has been battered or subject to extreme cruelty.
- The option to establish good cause reasons for a minor to be absent from the home for longer than 180 consecutive days.
- The option to screen recipients of assistance for use of controlled substances or sanction recipients who test positive for controlled substances.

## **TANF OPTIONS NOT SELECTED AT THIS TIME**

Maryland has elected to opt out of the following options at this time:

- The option to require a parent or caretaker receiving assistance under the program that, after receiving such assistance for two months is not exempt from work requirements and is not engaged in work, to participate in community service employment.
- The option to sanction a family that includes an adult who is older than 20 and younger than 51 if such adult does not have, or is not working toward attaining, a secondary school diploma or its recognized equivalent unless certain exceptions are met.
- The option to reduce the amount of assistance otherwise payable to a family pro rata with respect to any period during a month in which an individual receiving assistance refuses to comply with work requirements.
- The option to deduct from the assistance that would otherwise be provided to a family of an individual who is not cooperating in the establishment of paternity or obtaining child support 25 percent of the amount of such assistance.
- The option to not use any part of the grant to provide assistance for a minor child who has been, or is expected to be absent from the home for a period of 45 consecutive days.

**TANF CERTIFICATIONS** States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the FY, the State will:

1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children

- receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the FY, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—
    - (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and
    - (B) have had at least 45 days to submit comments on the plan and the design of such services;
  4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);
  5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);
  6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—
    - (i) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
    - (ii) refer such individuals to counseling and supportive services; and
    - (iii) waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly Penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.



### TANF CERTIFICATIONS

The State will operate a program to provide Temporary Assistance for Needy Families (TANF) so that children may be cared for in their homes or in the homes of relatives; to end dependence of needy parents on government benefits by promoting job preparation, work and marriage; to prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and encourage the formation and maintenance of two-parent families.

This program is known as Temporary Cash Assistance (TCA).

Executive Officer of the State: Governor Larry Hogan.

In administering and operating a program which provides TANF for families with minor children under Title IV-A of the Social Security Act, the State certifies the following:

**Certification that the State will operate a Child Support Enforcement Program.**

The Department of Human Resources (DHR) will operate a child support enforcement program under the approved Title IV-D State Plan.

**Certification that the State will operate a Foster Care and Adoption Assistance Program.**

DHR will operate a foster care and adoption assistance program under the State Plan approved under Title IV-E, and the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for Medical Assistance under the State Plan under Title XIX of the Social Security Act.

**Certification of the Administration of the Program.**

DHR will administer and supervise the program known as TCA. We will consult local governments and private sector organizations regarding the Plan and the design of welfare services in Maryland so that services are provided in a manner appropriate to local populations; and these same governments and private sector organizations will have had at least 45 days to submit comments on the plan and design of the such services.

*Equal Opportunity Employer*

**Certification that the State will provide Indians with equitable access to assistance.**

Maryland does not have any registered Indian tribes living within its borders. If that changes, however, DHR certifies that it will provide each member of a tribe who is not eligible for assistance under a tribal family assistance plan approved under Section 412, with equitable access to aid under the State's TANF program.

**Certification of Standards and procedures to ensure against program fraud and abuse.**

The State of Maryland has established and is enforcing standards and procedures to ensure against program fraud and abuse, including provisions concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks and the use of political patronage.

**Optional certification of standards and procedures to ensure that the State will screen for and identify domestic violence.**

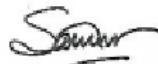
DHR will establish and enforce standards and procedures to:

- Screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
- Refer such individuals to counseling and supportive services;
- Waive, pursuant to a determination of good cause, other program requirements such as time limits for individuals receiving assistance, residency requirements and child support cooperation requirements in cases where such compliance will make it more difficult for individuals receiving TANF assistance to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.

**Certification**

I hereby certify that I am authorized to submit these TANF Certifications on behalf of the Maryland Department of Human Resources.

1/15/16



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Date

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Sam Malhotra, Secretary

## **VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS**

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

### **TRADE ADJUSTMENT ASSISTANCE**

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Has the state incorporated TAA into the sections indicated above? Yes

## **VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS**

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

### **Jobs for Veterans State Grant (JVSG)**

(OMB Control Number: 1225-0086)

The JVSGs are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a FY (not PY) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four “rolling quarters”) on a PY basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

- (a) How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

To meet the training and employment needs of Veterans, DLLR reports to two USDOL agencies—the Veterans Employment and Training Service (VETS) and the Employment and Training Administration (ETA). In collaboration with VETS, DLLR administers the JVSG (JSVG) Program, which allows for Veterans with significant barriers to employment to receive tailored employment and training services. DLLR also administers important ETA programs, such as WIOA Title I Adult, Dislocated Worker, and Youth Programs, and Wagner-Peyser Act Employment Services. These programs are universally accessible to all eligible job seekers.

Pursuant to Title 38 of the United State Code and rules and regulations issued by USDOL, Veterans and eligible spouses, including widows and widowers as defined in applicable law, receive Priority of Service for all programs or services for workforce preparation, development, or delivery that is directly funded, in whole or in part, by USDOL. Both VETS- and ETA-administered programs are offered through the AJC system. Maryland’s AJCs, facilitate connections between employers and work-ready Veterans, and provides Veterans with comprehensive employment and training services.

Partner agencies interested in leveraging the AJC system to connect Veterans with employment services are encouraged to contact their nearest AJC. Disabled Veterans Outreach Program (DVOP) specialists provide intensive services and facilitate placements to meet the employment needs of Veterans. Pursuant to 38 U.S.C. 4103A, “special disabled Veterans,” “other disabled Veterans,” and “other eligible Veterans” receive priority in the provision of intensive services in accordance with priorities determined by the U.S. Secretary of Labor. In any event, maximum emphasis must be placed on meeting the employment needs of veterans who are economically or

educationally disadvantaged, including homeless Veterans and those with barriers to employment.

LVERs conduct outreach to local employers to assist Veterans in gaining employment. Outreach activities conducted by LVERs include: conducting seminars for employers, job search workshops, and facilitating access to occupational training, and placement services. The DVOPS and LVER roles have defined, differentiated duties that are designed to function in a complimentary fashion. Both staff positions are dedicated resources for the exclusive purpose of serving Veterans, other eligible covered persons, transitioning service members, their spouses and, indirectly, employers.

DVOP staff assist veterans and other covered persons with:

- Finding a job;
- Enrolling in training or applying for educational assistance (credential attainment);
- Accessing VRAP/Gold Card Services; and
- Connecting to resources/information related to meeting immediate needs such as housing/food/mental health services.

DVOPs encourage veterans or other covered persons enrolled at a Maryland AJCs to attend an orientation session and register with the MWE. In addition to a wide range of civilian resources, MWE serves as an access point for the Mil2FedsJobs portal, is a virtual resource designed to help transitioning military personnel find jobs for which their service experience and training make them qualified and attractive candidates. The portal uses military occupations to identify matches in public sector industries.

The following efforts have been taken to ensure the strategic development of the JVSG program:

- Local Area directors are charged with staying current on Veteran Priority of Service requirements, and discussing integration strategies with the Veterans Program Manager and the DLLR OWD Director. To ensure that local workforce directors maintain a strong knowledge base with respect to Veteran Priority of Service, they are listed to receive additional training from the National Veterans' Training Institute.
- Local Areas have been encouraged to include Veterans' staff in AJCC workgroups and organizational teams. LVERs, whose responsibilities include working with employers on behalf of Veterans, receive integrated Business Services training, and are an integral part of each Local Area's Business Services Team.
- Maryland continues to explore employment and training opportunities previously underutilized by veterans, including apprenticeships and on-the-job training.

(b) The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;

DLLR recognizes that all AJC staff play a critical role in serving transitioning service members, Veterans, and their families by providing resources to assist and prepare them for meaningful careers. In Maryland, the JVSG program provides funding for three key positions to ensure

program success – Disabled Veterans’ Outreach Program (DVOP) specialists, Local Veterans’ Employment Representatives (LVERs) and a Veterans Program Manager.

In addition to functionally managing and overseeing the JVSG program, the Veterans Program Manager must also ensure that up-to-date signage, handouts and webpages are available.

To ensure that DVOP specialists have adequate time to serve those most in need of support, staffers in this role deliver services exclusively to Veterans, spouses of Veterans and other covered persons who have Significant Barriers to Employment (SBE). An eligible Veteran or spouse is determined to have a SBE if he or she attests to belonging to at least one of the ten following categories:

- A special disabled or disabled Veteran
- A homeless Veteran
- A recently separated service member, who at any point in the previous 12 months has been unemployed for 27 or more weeks
- An offender who is currently incarcerated or has been released from incarceration
- A Veteran who is lacking a high school diploma or equivalent certificate
- A low-income Veteran
- A Veteran between the ages of 18-24
- A wounded, ill or injured Armed Forces member, spouse, or caregiver
- A service member who does not meet military services’ Capstone Career Readiness Standards
- An active duty service member being involuntarily separated through a Service reduction-in-force

By limiting DVOP specialists’ activities to assisting Veterans and spouses of Veterans with one or more SBEs, DVOPs are able to provide more concentrated, intensive services to those who are most in need. Intensive services designed to mitigate SBEs include: comprehensive and specialized assessments of skill levels and service needs, an individual employment plan to identify the employment goals, objectives and services, group and individual counseling, career planning, and job search assistance. Short-term prevocational services may also be offered, including learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare for unsubsidized employment or training. Referrals to other service providers, such as the VR and Employment (VR&E) Program offered by the Department of Veterans Affairs (VA), and job search assistance, and short-term instruction to augment skills development may also be provided.

DVOP specialists are prohibited from completing LVER duties, and when not otherwise actively engaged with a full case-load should complete the following activities, in the following order:

- Review all open case files of Veterans with SBE and perform case management duties;
- Conduct relationship building, outreach and recruitment activities with other service providers in the Local Area to locate and enroll other Veterans with SBE in relevant services.

To ensure that correct Intensive Services are recorded, DVOP specialists must use DVOP Service Codes, which provides a list of applicable Services to be entered into the MWE. DVOP

staff must only report Services for activities provided. DVOP staff must record all relevant case notes. The Department has issued a policy that lists basic case note guidelines and procedures. The Veterans Program Manager should ensure that staff is properly trained on acceptable case management practices.

LVERs work to develop relationships with business to secure employment opportunities for Veterans. LVERs conduct employer outreach, engage in advocacy efforts, organize and facilitate job fairs, recruitments, and job clubs, and conduct prescreening for hiring executives, local businesses, business associations, business groups, industry partners and community based organizations. This is done in an effort to increase employment opportunities for Veterans, encourage the hiring of disabled Veterans, and generally assist Veterans to gain and retain employment. LVERs conduct seminars for employers and job clubs for eligible Veterans and spouses who are seeking employment. LVER staff is prohibited from completing DVOP specialists' duties.

However, a LVER may meet with Veteran jobseekers recommended by AJC staff for referral to specific employment opportunities. The goal of these interactions is for the LVER to assess the Veteran's suitability for referral, make connection between Veterans and a particular business, and develop feedback to the AJC system on best or promising practices to maximize successful Veteran employment. LVERs play an important role in the development of Local Area service delivery strategies for Veterans. LVERs and Local Area staff must work together to educate partner staff on the roles of DVOPs and LVERs.

All staff must support Veteran employment initiatives and programs. Regional LVERs act as supervisors for JVSG staff. As supervisors, they must still perform the functions of a LVER. They will review and may approve additional activities as part of the local Veteran service delivery system. Supervisors must also review roles with JVSG staff and evaluate JVSG staff performance. Annually, LVERs must work with the Veterans Program Manager to create annual training plans for Local Areas. These plans help to ensure that all staff are updated and remain informed on current programs, staff roles, and policies.

**(c) The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or AJC delivery system partner network;**

DLLR recognizes that all Local Area staff, including AJC staff, are responsible for providing services to Veterans and eligible spouses. As JVSG Program staff, DVOP specialists and LVERs exist to supplement and not supplant the duties of the AJC staff. All personnel are responsible for serving Veterans and eligible spouses with applicable programs and services. During a Veteran's initial visit, AJC staff are responsible for assessing the Veteran to determine whether a significant barrier to employment exists. If a Veteran self identifies as having a significant barrier to employment, AJC staff should use an eligibility checklist to document the Veteran's status.

The checklist, which has been provided with policy guidance issued by DLLR, should be used by AJC staff as a way to lead a conversation concerning potential barriers; staff should not ask the Veterans to complete the form themselves. AJC staff should assess the Veteran for SBEs in a

private area to allow the Veteran an opportunity to feel safe about providing sensitive information. After staff conduct an initial assessment and deliver Basic Career Services, Veterans with a significant barrier to employment that require and will benefit from intensive services should be referred to the DVOP upon the Veteran's agreement.

If a DVOP is requested and is unavailable, the self-attestation form should serve as a referral for DVOPs to follow-up. If the Veteran with a significant barrier to employment refuses DVOP services he or she can be provided with the applicable and available ETA-administered AJC services. LVER staff may not receive referrals, and are prohibited from providing these services. If a significant barrier to employment is not identified, then the Veteran should be provided with the applicable and available ETA-administered services. If a Veteran without a significant barrier to employment indicates a preference to work with a Veteran's representative, AJC staff should work with JVSG staff to ensure the Veteran job seeker understands DVOP specialists and LVER staff roles.

Priority of Service must be given to all eligible Veterans and spouses. As supervisors, Regional LVER (RLVER), with support from Labor Exchange Administrators (LEA), must ensure that signage and handouts are visible in high-traffic areas of each AJC. Regional LVERs are also encouraged to participate in the military service's Capstone sessions by sending a staff member to Capstone activities, upon the request of a military service commander. The AJC staff member's role, if sent to a Capstone session, is to provide an overview of the services available via the AJC and the overall workforce system. Capstone sessions are offered by the military service to help transitioning service members make adequate preparations for post-military careers before they leave active duty.

During Capstone sessions, service members are assessed by unit commanders on career readiness standards. For each transitioning service member, unit commanders evaluate and document readiness for transition to civilian employment on the DD-2958 Form, "Service Member CRS/Individual Transition Plan (ITP)." When a service member is assessed as not meeting career readiness standards (e.g., if a member does not have an adequate civilian resume), the commander then facilitates a "warm handover" of the service member to an AJC staff member or DVOP for intensive services.

**(d) The Incentive Award program implemented using the one percent grant allocation set aside for this purpose, as applicable;**

The Governor's Salary Commission Report of January 2014 indicates that non-pay-for-performance bonuses were provided to employees during 2003-2014. Maryland's Department of Budget and Management has instructed the pay-for-performance bonuses should not be budgeted in FY 2015 and FY 2016. There has been no further information to indicate that pay-for-performance bonuses will be budgeted in the out years. However implementation of this program will be pursued again starting in 2018.

**(e) The populations of veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the**

State Workforce Agency for services from AJC delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);

Maryland is dedicated to serving Veterans, and in particular, Veterans SBEs. As outlined above, those individuals include:

- A special disabled or disabled Veteran
- A homeless Veteran
- A recently separated service member, who at any point in the previous 12 months has been unemployed for 27 or more weeks
- An offender who is currently incarcerated or has been released from incarceration
- A Veteran who is lacking a high school diploma or equivalent certificate
- A low-income Veteran
- A Veteran between the ages of 18-24
- A wounded, ill or injured Armed Forces member, spouse, or caregiver
- A service member who does not meet military services' Capstone Career Readiness Standards
- An active duty service member being involuntarily separated through a Service reduction-in-force

The JVSG program, as a WIOA Partner, will also work to improve the quality of services provided to Veterans through the AJC system and looks forward to aligning the program with other WIOA Partner programs outlined above.

**(f) How the State implements and monitors the administration of priority of service to covered persons;**

In accordance with the Jobs for Veterans Act of 2002 and the Veterans' Benefits, Health Care, and Information Technology Act of 2006, DLLR offers covered Veterans and eligible spouses "Priority of Service." The purpose of Priority of Service is to give first consideration for program participation to covered Veterans and eligible spouses who also meet the eligibility criteria of a USDOL training, employment, or placement service in any workforce preparation program.

To receive Veterans Priority of Service for a specific program, a Veteran or eligible spouse must meet the statutory definition of a "covered person" and also must meet any other statutory eligibly requirement applicable to the program. Depending on the type of service or resource being provided, Priority of Service may mean:

- A covered person gains access to services or resources earlier than the non-covered persons;
- A covered person receives service or resources instead of a non-covered person when resources are limited;
- A covered person is placed at the top of a waiting list for the formation of a training class.

However, it is important to note that while a covered person is placed at the top of a waiting list for the formation of a training class, priority of service applies up to the point at which an individual is both (1) approved for funding; and, (2) accepted or enrolled in a training class. Priority of service is not intended to allow a Veteran or eligible spouse to "bump" the non-covered person from that training class. Veterans Priority of Service should take precedence

before applying WIOA Priority of Service for recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient.

For universal access programs, such as Wagner–Peyser services, covered persons must receive Priority of Service over all other program participants. However, for programs with specific eligibility criteria, such as the WIOA Title I Adult program, covered persons must first meet all statutory eligibility requirements for the program to receive Priority of Service. For programs that target specific populations without statutory mandate, covered persons must receive the highest priority for enrollment, similarly to the Priority of Service applied to universal access programs. State and local program operators must understand that Priority of Service, as defined in this policy, must be followed. As established by statute, State and local operators do not have the discretion to establish further priorities within the overall Priority of Service; this right is reserved for the United States Secretary of Labor only. Local Area Directors must ensure that local WIOA plans incorporate a Veterans Priority of Service policy that is consistent with the requirements of this State-issued policy and the law.

For WIOA Title I programs, Priority of Service is available to any Veteran who has served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as defined by 38 U.S.C. 101(2). Active military service includes full-time Federal service in the National Guard or a Reserve unit activated for Federal Service. Active service, however, does not include full-time duty performed strictly for training purposes (i.e., weekend or annual training), nor does it include full-time active duty performed by National Guard personnel mobilized by State rather than Federal authorities.

For instance, a National Guard member mobilized by the State in response to a natural disaster would not be considered in active military service. For Wagner–Peyser and JVSG programs, Priority of Service is available to any Veteran who has served at least 180 days in the active military, naval, or air service, and who was discharged and released under conditions other than dishonorable, as defined by 38 U.S.C. 4211(4)(A). Priority of Service is also available to any “eligible spouse” of a Veteran.

As defined by 38 U.S.C. 4215(a)(B)(i–iv), a spouse is eligible if he or she meets any of the following four categories:

- A spouse of any Veteran who died of a service-connected disability;
- A spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days: o Missing in action; o Captured in the line of duty by a hostile force; or o Forcibly detained or interned in the line of duty by foreign government or power.
- A spouse of any Veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or,
- A spouse of any Veteran who died while a disability was in existence.

A spouse whose eligibility is derived from a living Veteran or service member, as is the case with Category 2 and Category 3, would lose his or her eligibility if the Veteran or service member was to lose the status that is the basis for the eligibility (e.g. if a Veteran with a total

service-connected disability were to receive a revised disability rating at a lower level). Similarly, a spouse whose eligibility is derived from a living Veteran or service member would lose that eligibility upon divorce from the Veteran or service member. However, a spouse who qualifies under Category 1 or Category 4 would not lose covered status through subsequent remarriage. By way of example, a spouse of a service member who was killed in action, or who was married to a veteran who has a total disability and now is divorced would not be an “eligible spouse.”

The application of Priority of Service varies by program. Workforce programs that operate or deliver services to the public as a whole, without targeting specific groups, must extend Priority of Service to Veterans and eligible spouses over all other program participants. For WIOA Title I programs, and other “core” services delivered through the AJC system, Veterans and eligible spouses receive the first level of priority. Veterans Priority of Service must take precedence before applying WIOA Priority of Service for recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. In such instances, program operators must determine the status of each individual veteran or eligible spouse and apply priority of service as follows:

**HIGHEST LEVEL PRIORITY** — Veterans and eligible spouses who meet the mandatory priorities or spending requirements or limitation;

**SECOND LEVEL PRIORITY** – Non-covered persons who meet the program’s mandatory priority or spending requirement or limitation;

**THIRD LEVEL PRIORITY** – Veterans and eligible spouses outside the program-specific mandatory priority or spending

**FOURTH LEVEL PRIORITY** – Non-covered persons outside the program-specific mandatory priority or spending. For programs with eligibility criteria that identify basic conditions each participant is required to meet, a Veteran or eligible spouse:

- Must first meet any and all of the statutory eligibility criteria to be considered eligible for program enrollment; and,
- Must receive priority for enrollment in the program; and, ultimately, priority of service. For example, the SCSEP requires that every participant be 55 years of age or over, meet a certain income level, reside in a designated area, and be considered “not job-ready.” To receive priority of service for this program, a Veteran or eligible spouse must meet all of the minimum requirements specific to the SCSEP program in order to obtain priority of service.

Studies indicate that Post-9/11 Veterans face persistently high unemployment rates. To help Post-9/11 Veterans to quickly transition back into the civilian labor market, the ETA and VETS agencies offer a joint effort Gold Card initiative. This initiative offers enhanced Priority of Service to Veterans who served in active military service on or after September 11, 2001. Post-9/11 Veterans may print a Gold Card here: <http://www.dol.gov/vets/goldcard.html>. Eligible Veterans may present the Gold Card at any AJC.

Gold Card Veterans with significant barriers to employment (as defined on page 10) should receive enhanced services from DVOPs, which could include:

- Personalized case management for a minimum of six months;
- Assessments;

- The development of an Individual Employment Plan (IEP);
- Career guidance through individual or group counseling to help Veterans in making training and occupational decisions;
- Evaluation of occupational skill transferability and resume development;
- Referrals to connect with employment opportunities and supportive services; and,
- Referrals to job-driven training, like On-the-Job Training (OJT) and RA programs.

DVOP staff, as appropriate, must ensure that eligible Post-9/11 Veterans receive this special type of Priority of Service. Gold Card Veterans without SBEs should receive enhanced services from AJC staff. VETS, in partnership with the ETA, offers a resource page on Veterans' Priority for workforce practitioners, such as Local Area, JVSG and AJC staff, at: <http://veterans.workforce3one.org/page/priority-of-service>. The site is designed to assist staff by providing an easy to use source of information for the USDOL Veterans' employment and training programs. DWDAL encourages all staff to visit the site for updated tools and resources. Included on this resource page are:

- A list of relevant ETA guidance for serving Veterans;
- Information on the Gold Card;
- A Priority of Service page, which includes important guidance and technical assistance;
- Online tools including: My Next Move for Veterans, the Veterans Reemployment Portal, the Career One-Stop Business Center, and the eBenefits Veterans' Employment Center;
- Announcements regarding veterans employment; and,
- A collection of useful links and resources for serving veterans.

The State of Maryland acknowledges that the USDOL's VETS or ETA agencies may conduct annual monitoring of Maryland's employment services for Veterans. Prior to a VETS agency audit, the following information is typically requested for review:

- WIOA State Plan, Local Plans and policies;
- State policy letters pertaining to use of JVSG funded staff and services to Veteran customers;
- Position descriptions for JVSG Program Staff;
- Fiscal documentation;
- Links to state Veteran service websites operated by the State that are funded wholly or in part by USDOL;
- Training materials utilized at the state or local level pertaining to employment services for Veterans;
- Performance plans, individual performance standards, individual goals or other measures used to evaluate performance of JVSG funded staff;
- Pertinent ad hoc reports available in respective state;

Materials that may assist with the audit process, including promotional materials, fact sheets, etc. To ensure that policies are being followed and expectations are being met, Local Area directors and AJC administrators should also expect DLLR to conduct its own monitoring. Additionally, Regional LVERs will monitor the same audit items to find and fix discrepancies and to assist in the assurance that Maryland is in compliance at all times.

(g) How the State provides or intends to provide and measure, through both the DVOP and AJC delivery system partner staff:

(1) job and job training individualized career services,

All staff must support Veteran employment initiatives and programs through the provision of services and through the recognition of the application of Priority of Service. Integration of the JVSG program into the AJC system ensures that Veterans obtain the employment training services they need. DVOP specialists provide intensive services to eligible Veterans and eligible spouses who face significant barriers to employment and therefore necessitate DVOP services to obtain or maintain employment.

Intensive services include comprehensive and specialized assessments of skill levels and service needs; development of an individual employment plan to identify the employment goals, appropriate achievement objectives and appropriate combination of services for the participant to achieve the employment goals; group counseling; individual counseling and career planning; and short-term prevocational services that may include development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training. The measures the State is evaluated on address the outcomes experienced by eligible Veterans and spouses with significant barriers to employment, who are served by DVOP specialists.

These measures are as follows:

- Intensive Services provided by DVOP specialists divided by the total veterans and eligible persons served by DVOP specialists;
- Total Veterans and eligible persons served by DVOP specialists in Maryland;
- Veterans' entered employment rate;
- Veterans' employment retention rate;
- Veterans' average earnings (six months);
- Disabled Veterans' entered employment rate;
- Disabled Veterans' employment retention rate;
- Disabled Veterans' average earnings (six months).

Additional measures seek to quantify the effectiveness of Maryland's employment service delivery system, as a whole, in meeting the needs of Veterans, transitioning service members, and other eligible persons who are seeking employment.

The State's AJC system is evaluated on the following measures:

- Veterans' entered employment rate;
- Veterans' employment retention rate;
- Veterans' average earnings (six months);
- Disabled Veterans' entered employment rate;
- Disabled Veterans' employment retention rate;
- Disabled Veterans' average earnings (six months).

(2) employment placement services, and

Similarly, JVSG and AJC Staff work together to ensure that Veterans obtain employment placement services. As noted in the State's Workforce Plan, Local Area and Business Services

staff should work closely with DVOPs and LVERs, to establish effective linkages to ensure that veterans and their eligible spouses are aware of outreach activities, job fairs, and VA Stand Down events. Business Services staff, such as Business Services Representatives and Business Resource Representatives, should consider LVERs as active team members. The measures the State is evaluated on address the outcomes experienced by eligible Veterans and spouses with significant barriers to employment, who are served by DVOP specialists.

These measures are as follows:

Intensive Services provided by DVOP specialists divided by the total veterans and eligible persons served by DVOP specialists;

- Total Veterans and eligible persons served by DVOP specialists in Maryland;
- Veterans' entered employment rate;
- Veterans' employment retention rate;
- Veterans' average earnings (six months);
- Disabled Veterans' entered employment rate;
- Disabled Veterans' employment retention rate;
- Disabled Veterans' average earnings (six months).

Additional measures seek to quantify the effectiveness of Maryland's employment service delivery system, as a whole, in meeting the needs of Veterans, transitioning service members, and other eligible persons who are seeking employment.

The State's AJC system is evaluated on the following measures:

- Veterans' entered employment rate;
- Veterans' employment retention rate;
- Veterans' average earnings (six months);
- Disabled Veterans' entered employment rate;
- Disabled Veterans' employment retention rate;
- Disabled Veterans' average earnings (six months).

(3) job-driven training and subsequent placement service program for eligible veterans and eligible persons;

On-the-job training (OJT) is training conducted by an employer that occurs while a participant is engaged in productive work. OJT optimizes the resources available under workforce development initiatives to meet the needs of employers and job seekers. Employers generally pay a reduced OJT wage (generally 40-50 percent of wages) to employ participants, while they train for the job.

RA programs combine work-based learning and classroom training to help successful program completers obtain secure, full-time journeyman positions. DLLR's Apprenticeship and Training Program offers over 100 active apprenticeship programs. The measures the State is evaluated on address the outcomes experienced by eligible Veterans and spouses with significant barriers to employment, who are served by DVOP specialists.

These measures are as follows:

- Intensive Services provided by DVOP specialists divided by the total veterans and eligible persons served by DVOP specialists;
- Total Veterans and eligible persons served by DVOP specialists in Maryland;
- Veterans' entered employment rate;
- Veterans' employment retention rate;
- Veterans' average earnings (six months);
- Disabled Veterans' entered employment rate;
- Disabled Veterans' employment retention rate;
- Disabled Veterans' average earnings (six months).

Additional measures seek to quantify the effectiveness of Maryland's employment service delivery system, as a whole, in meeting the needs of Veterans, transitioning service members, and other eligible persons who are seeking employment.

The State's AJC system is evaluated on the following measures:

- Veterans' entered employment rate;
- Veterans' employment retention rate;
- Veterans' average earnings (six months);
- Disabled Veterans' entered employment rate;
- Disabled Veterans' employment retention rate;
- Disabled Veterans' average earnings (six months).

## **VI. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS**

### **Unemployment Insurance**

(OMB Control Number: 1205-0132)

The UI program requires a state Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the state's UI performance management and planning process that allows for an exchange of information between federal and state partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, states may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 21-14 for the FY15 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a state chose to submit their SQSP through the Combined State Plan process.

(b) Requirements for states electing to include **UI in the Combined State Plan**: states that elect to include UI in the Combined State Plan must:

(1) Submit an SQSP in the following manner depending on their timing in the SQSP cycle:  
(A) If a state is in the first year of their 2-year cycle, a complete SQSP package must be submitted. A complete SQSP package will include the **Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs** (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the key goals for the UI program is to ensure that claimants are able to successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.

(B) If a state is in the second year of the 2-year cycle, the state is required to submit the most recently approved complete SQSP package with a modification that must include the Transmittal Letter, Budget Worksheets/Forms, Organizational Chart, and the SQSP Signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

(2) Submit the required off-year SQSP components as a modification to the Combined State Plan on the same cycle as the regular SQSP process which must be approved by September 30th each year.

In accordance with ETA Handbook 336, the Maryland DLLR presents this strategic report to address the program emphasis areas of the DUI Biennial state Quality Service Plan (SQSP) for FY18.

## A. OVERVIEW

### 1. State Priorities and the Strategic Direction

The Maryland DUI Program is a solid and mature functioning program. the **trust fund is solvent** with a balance of \$1,180,750, 281.24 as of June 30, 2017. Total contribution deposits are \$369,998,029.98 and the total UI benefits paid as of Quarter ending June 30, 2017 are \$275,538, 273.00.

Trust Fund Solvency	
Total Contribution Deposits	\$369,998,029.98
Total UI Benefits Paid	\$275,538,273.00
Trust Fund Balance for June 30, 2017	\$1,180,750,281.24

### Organizational Restructuring

During December 2016, *DUI restructured its operations* according to economies of scale (i.e., with purpose and synergism) into five major areas, including: (1) **Benefit Operations**, (2) **Contributions**, (3) **UI Administration and Support**, (4) **UI Modernization**, and (5) **Legal Services and Policy**. All current subunits, as well as new proposed and revamped units (e.g. realignment of the Reemployment Unit to Legal Services), were aligned under one of these five umbrellas.



In the efforts to ensure continuous quality service delivery and improve overall program administration, *metrics-based management, employee accountability, core work behavior values, succession planning, effective communication and ongoing process improvement* are being infused into the UI organization as critical components for this biennial period.

***DUI Mission: Put People to Work as Fast and as Efficiently as Possible***

To achieve the mission, DLLR-DUI management and staff are in the process of developing a strategic plan that will serve as an integrated UI service delivery model. The aim is to ensure that workers (i.e., eligible UI recipients) receive timely UI benefits to which they are entitled and that employers are

serviced efficiently and treated in a business-friendly environment. In the efforts to maximize performance efficiency and the goals outlined in the strategic initiatives, *DLLR-DUI is utilizing a UI Management Model* to achieve these strategic objectives.

## UI Management Model

- **Focus on Metrics-Based Management** - This ensures all important decisions, strategies, and performance measures are based on sound data. The UI Management team meets monthly to review and discuss the monthly performance. There, UI managers discuss trends, and assess workload volume fluctuations, capacity, resources, and technology concerns.
- **Staff Accountability through Data Driven Performance Reviews** - DLLR's performance evaluation review process requires all employee planning sessions and reviews to occur on the same schedule and at the same time each year. This standardized schedule allows for more efficient training for reviewing supervisors and managers, and it ensures each employee receives an appropriate and timely performance review. This model also requires each supervisor's plans and ratings to have a secondary review by the reviewing supervisor's manager. This process assists DLLR in reaching a high degree of consistency and fairness within the performance review process.
- **Work Unit Analysis and Strategic Staffing of Critical UI Functions** - This component is an ongoing process by UI executive management and unit managers to ensure appropriate staffing, supervision, organization, and administration of critical functions. Analysis focuses on ensuring staff have appropriate skill sets and training, proper workload management procedures are in place, appropriate quality assurance systems and processes are in place, and that metrics exist to measure performance and success.
- **Continuous Process Review and Improvement** - DLLR instituted multiple process review teams for specific critical processes and functions. The teams consist of UI management, subject matter experts, and IT staff. The teams are tasked with the systematic review of current processes, making recommendations for improvements, and implementing the necessary recommendations.
- **Formal Supervisory Reviews** - All supervisors throughout DLLR UI are required to complete reviews of each staff member's work product. Based on the outcomes, appropriate training, corrective action, and counseling are provided.
- **Planning and Implementation of Appropriate Automation** - This includes the intensive management of all automation issues via the UI Modernization Office (UIM). The UIM utilizes industry proven project management processes and its own System Development Life Cycle to ensure appropriate tracking of automation projects. The UIM ensures collaboration between user subject matter experts (SMEs) and IT programmers/developers
- **Collaboration with USDOL** - This component of the management model is most important to ensure DLLR receives the necessary guidance, assistance with strategies to overcome problems and issues, and awareness of best practices and other methods that are advantageous to the UI Program
- **Ongoing Research and Identification of UI Best Practices** - DLLR staff research other states, publications, and other sources for UI best practices from across the nation. This

component allows for travel to UI-specific conferences, networking with other UI professionals, and travel to other states to view proven UI processes.

- **Commitment to Task Based Project Management and Accountability** - This component ensures all projects and other commitments undertaken by DLLR-DUI are intensively managed utilizing sound project management techniques. A **newly formed unit, UI Support and Metrics was set up in Spring of 2017** to develop tools for UI Management that require the identification of all tasks and sub-task necessary for the completion of the project, the assignment of a realistic deadline for each task and sub-task, the assignment of a staff member responsible for completion of the assigned task within the mandated timeframe, and the overall tracking and management of all tasks by a project manager. This management style greatly increases the success rate of necessary projects delivered on time. All supervisors and managers will be expected to follow the model and will be held accountable for this through the performance evaluation process. Utilizing a model of this sort provides a standard approach to assess, improve, manage, and supervise.

UI defines its success in terms of timeliness and accuracy, ever balancing a quality review process against workload demands and trust fund strengthening against revenue neutral activities.

### **Improving state Capacity to Administer and Operate the UI Program Effectively**

In the continuing efforts to automate the current business processes and streamline operations, the UI Modernization project with West Virginia is well underway. The name of the modernized system is called **Reemployment BEACON**. The name represents two meanings. The term **“Reemployment”** was chosen to promote the idea of assisting individuals in their reemployment efforts, as well as paying benefits to those who are unemployed through no fault of their own. The term **“BEACON”** represents the idea of a guide as well as an acronym for three areas in which UI provides services: **BEnefits, Appeals, CONtributions**.

#### **Reemployment BEACON**

Reemployment BEACON is a fully integrated, real-time system that provides customers and staff with a centralized and seamless web application that supports:

- Re-employment services at Initial Registration and Weekly Certification
- UI Benefits, federal Reporting, Integrity and Appeals
- UI Tax, Employer Reporting, Collections, Audits, Rate Calculations

Reemployment BEACON will replace Maryland and West Virginia’s aging mainframe systems that currently serve employers and claimants in the UI program.

The MW Consortium (formerly VMW) consists of the states of Maryland and West Virginia for the purpose of implementing a common UI Benefits Appeals and Contributions solution. The Maryland West Virginia Consortium (MWC) is in its fifth year of collaboration. DLLR completed the requirements in 2013; hired a Project Management Officer to support the state; hired a law firm to ensure state and federal Intellectual Property rights were protected; and in September 2015, signed a contract with Sagitec Solutions to develop and implement a system according to the documented requirements.

The new system will be web based, using Microsoft Azure – a Fed Ramp certified cloud hosting environment. Increasing employee retirement and a lack of industry support for mainframe systems make the pending modernization of the system of record critical to ensure continuous and uninterrupted service for all stakeholders of the UI Program in Maryland and West Virginia. *The Reemployment BEACON project consists of five major activities: (1) Development, (2) Data Conversion, (3) Interfaces, (4) Testing, and (5) Organizational Change Management.*

## **Organizational Change Management**

A dedicated Organizational Change Management (OCM) training team has been established to help prepare management and staff for the new modernized system and the day-to-day changes that will take place once implemented.

Organizational Change Management (OCM) for the UI Modernization project is focused on addressing how people will be impacted by the new system. *OCM is using the ADKAR Model (i.e. Awareness, Desire, Knowledge, Acceptance, and Reinforcement)* in order to assess, promote, and monitor the speed of adoption for the new UI Reemployment BEACON system; and to measure the successful transition of the internal and external customers to this change.

Activities conducted using this model includes establishing a website to communicate to internal and external audiences regarding the progress of the modernization efforts and important technical information for employers and agents. A bi-weekly newsletter will be launched in September and emailed to managers so they can communicate project status directly with their staff. Surveys are conducted monthly as an ongoing effort to engage staff and assess their awareness and desire for the new system and to assess the effectiveness of OCM communications. OCM has also communicated with employers via mail, email, and the website making them aware of the new system and offering them opportunity to test wage files, ask questions, and become familiar with this change. Training is also a big part of OCM activities to prepare managers to adopt and lead change with their staff by using Leadership Alignment techniques.

A job classification study is being conducted to determine the impact that Reemployment BEACON will have on staff regarding how they will perform their work in the new system versus how it's done with the current legacy system. Maryland DUI will ensure that staff receives the necessary training prior to system implementation.

With the implementation of Reemployment BEACON projected for Fall of 2018, DUI has and will continue to take advantage of available training and Supplemental Budget Requests to implement solutions that will aid in decreasing improper payments through fraud prevention, field audits, and improving data validation.

## **Improving Detection, Prevention and Recovery of UI Improper Payments**

Maryland is implementing multiple strategies to correct and improve the improper payment and fraud detection rates. Strategies include:

- **State Work Search Requirements** – DUI has formed an Active Work Search Committee to address work search errors. The committee has re-written the Active Work Search Policy to be in accordance with Maryland Regulations and laws. The policy also provides guidance to field staff concerning the requirements for an active search for work. the goal is to increase claimant awareness and accountability of their responsibilities concerning work search requirements. *DUI will also be increasing work search requirements from two to three contacts per week.*

DUI expects through the integrated efforts with DWDAL to put jobseekers back to work as fast as possible and with the implementation of a new **Reemployment Exchange Module (REX)**, the number of work search errors will decrease. The REX Module will provide DUI with information from workforce on claimants who are not seeking work and have barriers or restrictions to their availability to work. This will allow for a timely resolution of issues detected early in the claims process. (**Please refer to “Reemployment of UI claimants” on page eight for further information pertaining to the REX Module.**)

- **National and state Directories of New Hires** - Maryland is taking immediate action to identify improper payments when it gets a match from the weekly National Report of Hire (NDNH) and the state Report of Hire (SROH). claimants are sent notification of the report of hire from both NDNH and SROH and given the opportunity to dispute the report before any action is taken to create an overpayment or deny benefits. Request for weekly earnings are sent to the employer for any weeks filed from the week in which the first day of work occurred. This process allows for earlier detection of improper payments and an eventual decrease in the number of fraud overpayments. A decrease in overpayments caused from the NDNH and SROH hits has already been realized.
- **Prisoner Crossmatch** – Appriss provides real time incarceration cross match data. Appriss expands Maryland’s current practice of cross matching with state jails to a nationwide audience while at the same time satisfying audit findings by the legislative auditors. In addition, this should help decrease Appriss provides Maryland the capability to prevent improper payments before they are made versus the “pay and chase” method. Appriss will also be a centralized resource for obtaining incarceration data on UI claimants.
- **Prisoner Update Processing System (PUPS)** - Maryland is also working with the Social Security Administration (SSA) to begin using their Prisoner Update Processing System (PUPS) to allow us to identify those in jails, prisons, and other penal institutions. This will be a second resource for incarceration data and it is free for states.
- **Suspicious Actor Repository (SAR)** - Maryland has been an active participant in the pilot for the Integrity Academy’s Suspicious Actor Repository (SAR’s) Project. Maryland, as a pilot state, collaborated on the system detail design, protocols, testing and evaluation of the application. The SAR database application will provide Maryland with information (i.e., IP addresses, phone numbers, etc.) on claimants and employers associated with identity theft and interstate fraud schemes. This will give Maryland the opportunity to share and receive suspicious actor information from other states, thus identifying fraud or stopping payments either before benefits are paid or reduce the total

amount of benefits overpaid. The application is expected to be fully functional by the end of the third quarter of 2017.

- **Neo-Fraud App** – Neo-Fraud is a supplemental software application included in the Re-Employment BEACON project. This application will provide Maryland with the ability to develop predictive machine-learning models that will assign risk of initial and continued claimant activity with a probability of being fraudulent based on historical patterns related to known fraud. This modeling can also be used to model or predict any activity, for example, claim exhaustion or overpayment recovery based on known historical data.
- **Benefit Rights Interview Process** – Instructions for claimants filing for benefits have been revised to more clearly define work search requirements, suitable work, and the consequences of fraud.
- **IP Address Reports** – Maryland is identifying claims that may not meet able and available eligibility requirement through IP address reports.
- **Employer Notification of New Charging Law** – Maryland provided employers with notification of a Maryland law change that benefit charges will not be removed from the employer's account if the employer fails to provide adequate and timely separation information. Distribution of this information should increase employer participation and reduce overpayments.
- **SIDES** – Maryland is one of the 34 states which met the UIPL 19-16 goal of implementing SIDES with all available Third-Party Administrators (TPAs). In addition, Maryland will implement single sign-on for all Maryland employers who use Maryland's current online system to electronically respond to separation information requests. These employers will be automatically signed in to the SIDES E-Response program using the same credentials that they presently use to logon and respond to requests for separation information. Aside from single sign-on, an email alert notification system for SIDES E-Response will also be implemented which will allow Maryland employers to register and receive an email message instead of a paper form request for separation information.
- **Community of Practice** – DUI continues to participate in USDOL's Community of Practice website for new ideas, best practices and participation in pilot opportunities.
- **Tax Offset Program (TOP)** – Maryland implemented this program the first year it was offered and continues participation in this successful overpayment recovery strategy.

### **Improving Program Performance Nationally**

Maryland staff is taking advantage of technical assistance provided by USDOL's National and Regional offices. For example, Maryland has been working with the Region to more acutely identify the root causes of improper payments. A UI Taskforce then assesses the causes and develops a plan for changes as needed.

Additionally, Maryland's BAM and BTQ units are currently cross training and will rotate quarterly. This will help identify systemic and programmatic errors found during their reviews. Both BAM and BTQ units have been working closely with regional and national partners to identify and correct problems with the issue detection date and administration of the BAM and BTQ programs.

## **WIOA**

Maryland DUI in conjunction with DWDAL is actively engaged in the execution of the WIOA signed into law July 22, 2014 and effective July 1, 2015. Under WIOA (i.e., Title III - the Wagner-Peyser Act), emphasis is placed on providing services to UI claimants with referrals/increased connections to AJCs/workforce services. To ensure claimants' eligibility and compliance, DUI continues to work with DWDAL staff by providing pertinent assistance to help claimant job seekers regain employment quicker (e.g., through required workforce registration, reemployment workshop attendance and completion, weekly work search activity, able and availability issues). DUI is also providing on-going instruction, guidance and training pertaining to mandated Reemployment Programs and services (e.g., the RESEA Program - RESEA and the Maryland State ROW referred to as ROW).

DUI and Workforce are working to effectuate enhanced service delivery approaches; to ensure correct UI information is provided and that staff and claimant UI-related questions, concerns and challenges are quickly identified and addressed. Furthermore, UI claimants are provided with direct access via inquiry lines to speak directly to a UI representative or subject matter expert to obtain answers to claim and benefit-related questions or concerns. Maryland DUI anticipates improved reemployment outcomes as the division complies with prescribed WIOA legislation and continue to implement these or other viable solutions. To further the efforts and mission to "*put people back to work as fast and as efficiently as possible,*" Maryland DUI plans to do a Combined State Plan with the DWDAL.

### **Reemployment of UI claimants**

DLLR-DUI is working in a collaborative effort with the DWDAL to ensure UI claimants, from the onset of filing their initial claims, are exposed to a full array of services and resources provided under one roof through Maryland's AJCs (AJCs) conveniently located throughout the state. Maryland AJCs are fully equipped with Internet access, computer stations, printers, copy and fax machines, telephones, resource libraries and more. Maryland's customer-driven employment-related services are designed to assist all job seekers regardless of their job status quickly return to the labor force. Services include reemployment workshops, Labor Market Information, skills assessments, consultation and career guidance, career exploration and planning, training programs, apprenticeship programs, adult and family literacy programs, resume development, job search strategies, employer recruitments, job matching, job referral and placement assistance, including other supportive services.

Jobseekers and employers have access to the MWE - Virtual One Stop (MWE) System which is an online web-based resource. MWE can be accessed within the AJC, from an individual's personal computer, or via mobile application. The mobile app was made available for users to download to their smart phones, tablets and other devices; to search jobs by locations or keywords; to filter job searches and set up job alert notifications announcements. By utilizing MWE employers can post job announcements, manage job openings, and pre-screen applicants at no cost any time day or night. MWE provides a wealth of comprehensive information that UI claimants can use in their job search efforts, including electronic connection to agencies, programs, services, education, training and much more. Since Maryland UI claimants must be able to work, available for work, and actively seeking full-time work without restrictions, DUI requires all UI claimants to register on MWE within ten business days of filing their initial claim.

MWE serves as a powerful job search engine and resource tool allowing jobseekers /UI claimants access to local, regional, statewide, and national job openings.

During the upcoming biennial period, the implementation of Reemployment BEACON will enable real-time registration. Maryland's average benefit duration (i.e., average number of weeks claimants receive UI benefits) is hovering around 19.1 weeks. DLLR-DUI is therefore seeking to reduce the average benefit duration to less than 15 weeks over this biennial period by proactive engagement of UI claimants early and throughout their claims life cycle. To reach the goal of reducing the average duration of UI benefits and to expedite claimant reemployment, Maryland DUI will serve as a "bridge to reemployment" by reengineering DUI to a "reemployment-focused" UI operation and not strictly an "unemployment-focused" operation.

Maryland is thereby implementing an integrative UI/Workforce IT tool utilizing **Geographic Solution, Inc.'s Reemployment Exchange Module (REX)** to facilitate claimant job searches and return to work efforts. The REX Module was secured as an effective system connectivity integration solution for Maryland DUI and DWDAL. DUI's legacy system, the Maryland Automated Benefit System (MABS), runs on a separate and distinct mainframe platform that was built in the early 1980s. This outdated system requires convoluted custom programs to be written in order to make minor changes to the system or develop system-to-system data sharing methodologies.

The REX Module is comprised of progressive functionality components which will help boost service delivery efforts and facilitate the ultimate sharing of real-time information between staff and systems. REX will immediately display suitable job openings to claimants that closely match their recent/ past employment, educational background, desired occupation and skill set; automatically create a reemployment roadmap designed to help the claimant obtain employment; display real time Labor Market Information to help claimants make intelligent sources and provide claimants real-time access to a comprehensive list of openings repeatedly upon entering the system; allow claimants to enter job search contact information within the system; send system-generated alert notifications to claimants when they are not meeting work search requirements/established thresholds; monitor and notify claimants as to whether they have active online resume and virtual recruiters, and allow staff to view claimants' ongoing work search status.

Maryland DUI will increase UI claimant accountability by enforcing workforce registration and work searches; increasing job search thresholds from two per week to a minimum of at least (3) three per week; requiring online resumes and virtual recruiters; and engaging claimants early and often in required reemployment activities with Workforce utilizing REX System Alert Notifications at various intervals throughout their claim series. Non-compliance will result in adjudication and potential delay /denial of benefits until requirements are met. Maryland DUI strongly believes that engaging UI recipients throughout their UI eligibility claim series and utilizing the REX module in an effort to provide knowledge of available services and required activities will help facilitate rapid claimant reemployment.

To foster greater integration through the workforce system, expose claimants to AJC services earlier, facilitate and ultimately expedite claimant reemployment, Maryland DUI increased its

pool of UI claimants profiled for required reemployment services. During the 4th quarter of 2016, Maryland began using initial claim files for profiling purposes in addition to first pay files traditionally used. Utilizing initial claims data files results in a larger / universal pool of UI claimants to select (profile) for required reemployment programs, such as the RESEA Program and Maryland's ROW referred to as ROW.

USDOL requires all claimants who are most likely to exhaust UI benefits (with the exception of those exempt eligible) and transitioning veterans receiving unemployment compensation (i.e. UCX claimants referred to as Unemployment Compensation for Ex-Service members) to attend and complete the RESEA mandated Reemployment Program. In addition, Maryland requires all claimants least likely to exhaust benefits (with the exception of those exempt eligible), to attend and complete Maryland's ROW.

Maryland RESEA profiled claimants are required to receive an orientation overview on AJC services; labor market and career information; a UI eligibility assessment review with potential referral to adjudication if required; one-on-one consultation with development of an individual reemployment plan (IRP) of action along with referral to additional services.

Recently (Q2-2017), system enhancements were made to MWE, requiring and enabling all profiled RESEA claimants access to view a new online Orientation video. The video provides RESEA claimants with an overview of Maryland's AJCs, including some general information on the mandated RESEA Program and a review quiz upon completion. Watching the full video fulfills one of the required RESEA services (i.e. Orientation Services) allowing RESEA facilitators to spend more time providing one-on-one in-depth consultation services for required Eligibility Reviews and Individual Reemployment Plans.

Currently, Maryland has been using the Reemployment and Eligibility Assessment (REA) System which is a web-based (database) application designed to facilitate RESEA transmission of information between DUI and DWDAL. In accordance with the National Office, Maryland DUI and DWDAL are utilizing a profiling methodology which targets and selects those most likely to exhaust benefits, including recently separated transitioning veterans receiving benefits for RESEA services.

RESEA trainers notify DUI of potential disqualifying RESEA-related claimant issues (such as, fail-to-report, able and available issues, active work search, etc.) by submitting UI referrals through the web-based system. Once the RESEA claimant fulfills the obligation and the results are entered in the system, an automatic notepad is electronically submitted and posted on the individual's UI claim in the Maryland Automated Benefits (MABS) System.

The REA System is accessed daily by UI claim center staff to obtain and process a list of UI referrals and fulfilled (RESEA) obligations (FO's). Prior to the REA Database System, REA trainers would notify the DUI liaison of all potentially disqualifying issues only by email and the DUI liaison would then create the necessary issue and /or lift prior related issues.

With the utilization of the current REA system, REA trainers are able to upload RESEA information into the system, allowing access by adjudication staff prior to conducting the telephone fact-finding interviews on issues that were created based on documentation.

With the implementation of Reemployment Beacon during Fall of 2018 and Phase Two of REX, Workforce (i.e. MWE-REX) will interface with the new UI system, providing real-time data and retrieval of relevant reemployment-related information.

### **Worker Misclassification**

DUI strategically adjusted the audit assignment methods and further improved the effective detection of misclassified workers while meeting or exceeding other factors of the USDOL Effective Audit Measures. Audit assignment procedures were modified to select employers with extremely large payroll volumes and effectively evaluate their worker classification practices. Software enhancements were implemented to electronically receive and process employer payroll-related records in order to efficiently and effectively complete assignments with complicated and very large accounting data. DUI continues to maintain MOU Agreements with several state and federal taxing authorities in order to share and receive data on potential worker misclassification practices.

Additionally, DUI has shared audit tips and data with other state agencies participating in the Workplace Fraud Joint Enforcement Taskforce and also with the IRS in the efforts to detect misclassified workers. To continue Maryland's high-level ranking in detecting worker misclassification practices, resources are being targeted towards industries that have the highest degree of worker misclassification based on benefit claims and results from audits completed in previous years. DUI evaluates these areas at least once a year and will continue to refine the processes to achieve better results with fewer audit staff due to a decline in funding.

## **2. Assessment of past performance and expected future performance.**

*Include, at state discretion, a discussion of external factors that may have performance implications.*

This year Maryland was asked to provide Corrective Action Plans (CAPs) for six UI Program Measures. (*Please refer to the 2018 Biennial Excel Workbook for information on these CAPs.*) Additionally, three Narratives were requested for the following: Incorrect Recording of Issue Detection Date, Detection of Benefit Overpayments and Establish Tax Accounts Promptly. (*Please refer to the narrative information below within this biennial report.*)

During September 2016, Maryland DUI underwent a change in leadership and is currently operating under a new administration. To accommodate for the change in administration, along with staff retirement and attrition, some roles shifted including changes in programs and/or program leadership. Under new administration and in accordance with ETA priorities, Maryland DUI will continue to focus efforts on establishing effective integrity measures; preventing, detecting and recovering improper UI payments; and reducing work search errors. DUI will also direct its attention to other US-DOL and state-level identified UI program priorities.

## **Program Narratives (Requested by US-DOL per Maryland's 2018 Biennial Excel Workbook)**

### **Incorrect Recording of Issue Detection Date**

Maryland implemented a process which began in the third quarter of 2015 of notifying individuals within each specific office of its detection date errors in an effort to correct this measure. This process has shown a continued reduction in issue detection date errors that are within the state's control. Clarification was disseminated during February 2017 regarding what appears to be the last major detection date problem within the control (i.e., DWDAL/AJC notification to UI regarding claimant's failure to attend workshops). Maryland continues to notify offices quarterly following the BTQ review and the concurrent internal review of non-monetary determinations.

The majority (i.e., 75 percent or more) of Maryland's issue detection date errors are the result of the automated processing system and are considered out of the control. Most of the errors occur when wages are added to monetarily ineligible claims. These system problems cannot be adequately addressed at this time. Maryland is modernizing the system as part of the Maryland – West Virginia Consortium UI Modernization Project. The Correct Recording of Issue Detection Dates is being addressed as part of the modernization. However, DUI expects the notification process will continue to hold the line against future human error.

Additionally, DLLR has identified root causes of the invalid recording of detection dates through BAM, BTQ findings and Error Trend tracking. Information indicates a lack of universal knowledge on determination of detection dates which indicates a need for training that targets Detection Date Errors.

Maryland will therefore undertake the following actions to correct the deficiencies and improve performance:

- Work closely with DLLR UI Technical Support and Quality Control to develop a training program guided by BTQ guidelines and DLLR policies to ensure all understand the method and purpose of determining the correct detection date.
- Work closely with DLLR Training Academy to develop training modules to coincide with the training program in order to establish a multifaceted approach to determining the correct detection date.
- Conduct specialized training programs through DLLR's Training Academy designed to progressively rebuild staff knowledge base and offer broad based courses designed to improve cross functionality of staff.
- Conduct continuous process analysis to determine the root cause of cases that have cited errors.
- Conduct BAM/BTQ monthly reviews of cited errors
- Hold Supervisory Reviews for out of compliance cases
- Provide unit and one-on-one feedback to those found to be out of compliance for greater accountability.

## **Detect Benefit Overpayments**

In the area of Detection of Overpayments, DUI has a broad and aggressive approach. During the previous CAP DUI took steps to fully utilize both state and national report of hire programs. In addition, DUI has added the Appriss prison crossmatch. DUI is revising all of the crossmatches. DUI will be adding data analytical tools to the approach with the rollout of the UI modernization during Fall of 2018. DUI will also enhance the phone and IP tracking abilities. These tools will be of great benefit in detecting and preventing overpayments.

Our nemesis is and will be in the near term, hiring, training and retaining adequate staff to use these tools. Within the last five years DUI has experienced over a 50 percent loss in staff and have encountered ever increasing difficulties with hiring and staff retention. The ongoing challenges will not be so much with the detection of overpayments but utilizing existing staffing levels to maximizing the creation of overpayment. DUI feel the revisions that the division are undertaking will aid us in this effort.

## **Establish Tax Accounts Promptly**

The new upcoming Reemployment Beacon System will allow employers to establish their tax accounts online and receive their UI employer account number on the same day.

Currently, Maryland DUI uses a combined registration application in which employers are required to complete the application online first via the State of Maryland Comptroller's website. It is afterwards passed to DUI to review and determine liability. the Employer Status Unit will be hiring two additional contractual employees to assist in processing employer applications.

Therefore, Maryland expects employer tax accounts to be established quicker due to the functionality of Reemployment Beacon which is being designed to determine liability immediately once the application is filed.

## **Past Performance**

Maryland DUI has spent the past year focused on improving performance and reaching federal compliance. Analysis of the past performance revealed the following issues that required immediate response:

- **BYE Errors** - Improper payments made positive improvements decreasing from 23.85 percent of all overpayments in the calendar year 2015 to 15.92 percent in calendar year 2016. This equated to 3.378 percent of all benefits paid which were below the baseline of 4.504 percent. Full implementation of both national and state Report-of-Hire programs is driving this reduction. With continued emphasis on new hire and the implementation of Re-employment BEACON within the UI Modernization of 2018, DUI expects continued reductions.
- **Non-Monetary Decision Delays** - Improvement has been made in the area of 1st Payment Promptness, Nonmonetary Time Lapse, and Lower Appeals Timeliness. This is evident by recent compliance in the 1st Payment, Nonmonetary and Lower Appeals measures. Significant improvement has been made with 1<sup>st</sup> payment and Appeals timeliness. Both 1<sup>st</sup> payment and lower level appeal timeliness are on the verge of being removed from out of compliance status. A marked improvement in the timelines of non-monetary determinations has been made.

- **Detection of Overpayments** - Detection of Overpayments is still non-compliant, however effective progress is being made. DUI improved the GPRA from 36.44 percent in the first quarter of 2015 to 48.91 percent in the first quarter of 2017. DUI is experiencing some statistical lag in the ALP but fully expect this to be within compliance within the period of the CAP. DUI has implemented revisions within the crossmatches to enhance the productivity; added the Appriss Prisoner Software; and are continuing to fully utilize the New Hire Report. Staffing continues to be a challenge, but DUI is making progress in this area.
- **Insufficient Staffing** - Staffing of critical functions was insufficient (particularly during the ongoing increased rate of initial claims) and caused timeliness and quality issues for claims and appeals processing. DLLR has since taken the opportunity to cross train all Benefits staff and rewrite their job duties to allow for flexibility to move all staff to the area of greatest need.
- **Lack of Automation** - Lack of Automation exacerbated the quality problems listed above. Many of DLLR-DUI's issues resulted from a lack of automation solutions. During FY14, DUI began the task of replacing an outdated legacy mainframe system with Reemployment BEACON and updating the Claim Center's telecommunications software. Both upgrades presented their own unique set of challenges and opportunities.

### **Expected Future Performance**

Over this biennial period, DUI will be focused on three key areas: (1) the new UI Modernization System (Reemployment Beacon) including Organizational Change, (2) Reemployment (i.e., making claimants more accountable) including System Connectivity between Workforce and UI to help reduce the benefit duration and exhaustion rate, and (3) operating at a systemic funding appropriation deficit.

### **External Factors that may have performance implications / provide challenges in FY18-2019**

#### **Reemployment Beacon**

The Fall 2018 plan of Reemployment BEACON implementation will require transition from a legacy mainframe system environment to a web-based system that is fully hosted by the vendor. Though DLLR has hired a Project Management firm to manage the conversion process over the next year, the nature of the process demands that DLLR prepare for unexpected issues to arise.

DLLR is therefore taking precautions, i.e. identifying risks, documenting mitigation strategies, and procuring needed assistance and expertise to ensure that DLLR can manage such issues in an expeditious manner.

#### **Funding Levels**

*At the start of FY15*, DUI had several funding sources supporting its operations. However, there has been a steady funding decline of the UI program since FY15. The reduction in DUI funding is due to the combination of a reduced base grant allocation from USDOL and the cessation of recession-related ARRA funding. The UI base grant's decline stems from the decline in claims load activity which began with the ending of the EUC program.

DUI leadership continues to review all programmatic expenditures and questions the necessity of all costs. Additional cost cutting pursuits include cutting back on travel, contractor services, reducing mailings to claimants and employers (e.g. postage and paper saving), consolidating operations, and streamlining services to the public. Nevertheless, cuts of this sort produce little effect to the overall budget since salaries represent 77 percent of the program's expenditures.

### **Staffing Levels**

Along with reduced funding levels, Maryland has and will continue to experience periodic loss of staff, inclusive of essential subject matter experts, due to retirement or transition to other areas of opportunity. To address this concern, DUI is cross-training staff to other responsibilities to compensate for vacancies. DUI intends to revamp policies and procedures for succession planning and continued cross training purposes.

Despite all of these factors, Maryland DUI anticipates ongoing improvement for overall program performance especially with the upcoming implementation, new functionality components, and continuous monitoring of the new modernized UI System - Reemployment Beacon, during Fall of 2018.

## **B. FEDERAL EMPHASIS - GPRA GOALS**

### **1. Maryland performance compared to the GPRA Goals**

GPRA Goal	FY 15	FY 16	FY 17	FY 18
FIRST Payment Promptness (Intrastate 14/21 Days) (87 percent)	91.6 percent	90.8 percent	87.5 percent	87.5 percent
Detect Benefit Overpayments (61.9 percent)	36.44 percent	48.79 percent	48.91 percent	48.91 percent
Establish Tax Accounts Promptly (89 percent)	85.6 percent	84.2 percent	88.7 percent	88.7 percent
UI Reemployment Rate (National Target to be set FY19)	58.7 percent	62.6 percent	64.1 percent	63.0 percent

### **2. Actions planned to achieve GPRA goals and targets**

#### **GPRA - First Payment Promptness – Intrastate**

Maryland FY17 Performance Level for this measure is 87.50 percent. *The GPRA goal was met.* DUI is committed to maintaining compliance for this measure.

Contributing factors to sustain this improvement include:

- **Reduce Backlogs** – Significant effort made to reduce pending backlogs
- **Metrics Focus** – Focused management utilizing appropriate metrics
- **Case Aging Reports** – Establishment of case aging reports
- **Root Cause Analysis** – Root cause analysis of cases that miss time lapse standards
- **Critical Staffing Plan** – Strategic planning to meet adjudication staffing requirements
- **Staff Education** – Staff education on prompt payment when due and the negative impact late payment has on integrity and improper payments

## **GPRA - Detect Benefit Overpayments**

Maryland FY17 Performance Level was 48.91 percent with a slight increase from FY16 performance level off 48.79 percent. DUI fell short of the GPRA goal of 61.9 percent. However, there was dramatic increase seen from FY15 to current due to an increase in manual processing of NDNH crossmatches. In order to see progress, additional automation will have to be utilized. The agency is seeing an increase in detections, however the process still involves manual work and additional staff is needed to process the investigation cases until full automation is in place. With implementation of the new Reemployment BEACON (Fall 2018), manual processes will be automated and staff can be shifted to adjudication. This should result in significant improvements for this GPRA measure.

Contributing factors to sustain this improvement include:

- **BTQ Performance** – DUI will continue reduction of the overall number and dollar amount of overpayments through the CAPs for Nonmonetary Separation and Non-Monetary Non-Separation Quality Determinations. Improvement in BTQ performance will translate directly to an improvement in the Operational Rate. For FY10 the Operational Rate was 16.46 percent, for FY-2011 this rate increased to 18.99 percent, for FY12 the rate improved to 15.28 percent and for FY13 the operational rate increased to a disappointing 19.16 percent. Systemic issues in procedures as well as technology have hampered the reduction of the Operational Rate.
- **NDNH Web-portal** - Both the national and state new hire programs match hiring data against current individuals claiming benefits. This is currently a “paper intensive” process which requires significant staff to maintain. The process is also highly dependent on employer compliance. DLLR continues to promote these programs with the agency partners to the employer community. As DLLR continues to automate the processes the department expects to increased employer participation.
- **SAS Visual Analytics and Visual Statistics** - The SAS visual analytics and visual statistics system will provide Maryland with the ability to increase efficiency of data analytics and statistical reporting by providing a heads-up user-user friendly solution to explore, process and visualize raw data. SAS also provides the ability to develop predictive models based on analysis of historical data trends. This will aid in the identification of potential and undetected overpaid claimants by simultaneously weighing the combined significance of numerous factors in contrast to handling all indicators and cross-matches independently. This modeling can also be used to target limited resources to maximize return on collection and recovery efforts, identify potential multi-claimant and fictitious employer schemes, and help identify industry trends in unemployment that could target re-employment efforts.
- **DUI partnerships - USDOL-Office of Inspector General (OIG), U.S. Attorney General’s Office, and Maryland Identity Theft Working Group partnership** - Maryland DUI has joined forces with the U.S. Attorney General’s Office (AG’s), the USDOL OIG, Office of Labor Racketeering and Fraud Investigations, and the Maryland Identity Theft Working Group to investigate, arrest, and prosecute individuals committing Fraud. Those individuals and their actions are publicized in the media through press releases from the U.S. Department of Justice. DUI works closely with these agencies to assist in investigations of small and large-scale identity theft and fictitious employer schemes. Maryland DUI was commended in a press release dated July

7, 2016 for the assistance in the arrest and prosecution of over eight conspirators and co-conspirators of an identity theft conspiracy to fraudulently obtain over \$1.4 million in UI benefits from both Maryland and Pennsylvania. The arrest and plea agreements will hopefully result in substantial restitution payments to both states' trust funds.

- **Legislation** - Stronger legislation has been passed to deter individuals from committing fraud and to address workplace fraud.
- **UI Modernization** - Modernization of the current legacy mainframe system will centralize all of Maryland UI benefits, appeals, and contribution activity into a single account management style web application and data store. This system will incorporate numerous crossmatches and integrate automation based on vetted business rules to detect and process overpayments. DUI will continue to modify the investigations portal to improve the functionality until DUI can merge the portal with Reemployment BEACON.

#### **GPRA - Establish Tax Accounts Promptly**

Maryland FY17 Performance Level for this measure is 88.7 percent. *Maryland missed the GPRA goal slightly by 0.25 percent due to decreased staffing levels within the Tax Unit.*

Contributing factors to sustain this improvement:

- Overtime and assistance from additional contractual staff
- Utilizing Reemployment Beacon System - with the rollout of the new UI modernized system, employers and Third-Party Administrators (TPAs) will be able to go directly online and establish their own accounts in real-time.

#### **GPRA - UI Reemployment Rate**

Maryland FY17 Performance Level for this measure (also referred to as Facilitate Reemployment) is 63 percent. ETA expects to establish a GPRA target for this measure; however, Maryland met the Acceptable Level of Performance of 63 percent for the past two federal FYs.

DUI is creating a robust integrated re-employment program that emphasizes the shared responsibility between the state and UI recipients to expedite claimant reemployment while reducing the average duration of benefit weeks. (*Please refer to "Facilitate Reemployment of UI claimants" within this biennial report for initiatives and activities to sustain and improve this measure.*)

### **C. PROGRAM REVIEW DEFICIENCIES**

Maryland DUI completed all required reviews and activities.

### **D. PROGRAM DEFICIENCIES**

There were no program deficiencies to report from the Procedural Performance Reviews, although Internal Security has incorporated several key elements of UIPL 14-17 (i.e., "states' Responsibilities for Internal Security in the UI Program and the Internal Security Guidelines for UI Programs) to satisfy Internal Security requirements and ensure DUI staff are made aware of

the requirements. The key elements were in the areas of: IT Security, Benefits and Tax Operations.

## **E. REPORTING DEFICIENCIES**

Maryland has no reporting deficiencies for FFY 2018 to correct.

## **F. CUSTOMER SERVICE SURVEYS - (Optional)**

Maryland has no survey data to report for this submission.

## **G. OTHER - (e.g., Approach to maintaining solvency, request for technical assistance)**

Maryland routinely seeks guidance and/or technical assistance from the National and Regional US-DOL Offices, including the Information Technology Support Center (ITSC) to meet on-going program requirements. As the state works to improve program accountability and performance efforts, DUI expects to continue the open dialogue.

## **H. ASSURANCES**

Per UIPL 21-11, by signing the SQSP Signature Page, DLLR certifies that it will comply with the assurances listed in Handbook 336, 18<sup>th</sup> Edition, Change 3. DLLR will institute any plans or measures necessary to comply with the requirements.

Additionally, UIPL 21-11 does require information for Assurance “h” (i.e., Assurance of Contingency Planning) and Assurance “j” (i.e., Assurance of Automated Information Systems Security).

### **h. Assurance of Contingency Planning (as of writing, these are planned dates):**

Date IT Contingency Plan Implemented:	<u>11/2003(conducted twice each year)</u>
Date IT Contingency Plan Reviewed/Updated:	<u>August 2014</u>
Date IT Contingency Plan Tested:	<u>June 2017</u>

### **j. Assurance of Automated Information Systems Security**

Date Risk Assessment Completed:	<u>April 2013</u>
Date System Security Plan Reviewed/Updated:	<u>2014</u>

## VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

### **SCSEP** (OMB Control No. 1205-0040)

#### **(a) Economic Projections and Impact**

The projections for Maryland are developed in the Office of Workforce Information and Performance (OWIP) within the Maryland DLLR. This section will discuss long-term projections for industries and occupations in the state that have the most potential to benefit older workers seeking unsubsidized employment. Further, it will provide current and future strategies to identify and coordinate training opportunities to improve the employment prospects of the Program-eligible population.

**(1) Discuss long-term projections for jobs in industries and occupations in the state that may provide employment opportunities for older workers. (20 CFR 641.302(d))(May alternatively be discussed in the economic analysis section of strategic plan.)**

#### **Long-term projections for jobs in industries and occupations in Maryland**

According to the latest Labor Market Information, the long-term projections of employment in Maryland are promising through 2022 with the exception of utilities, manufacturing, and finance/insurance.

**Table 1.2 – Maryland Industry Projections 2012-2022**

Industry	Employment			Percent Change
	2012	2022	Change	
<b>Total All Industries</b>	<b>2,740,196</b>	<b>2,919,510</b>	<b>179,314</b>	<b>6.54</b>
Agricultural, Forestry, Fishing and Hunting	4,973	5,218	245	4.93
Mining	1,447	1,518	71	4.91
Utilities	10,278	9,224	-1,054	-10.25
Construction	144,041	154,932	10,891	7.56
Heavy and Civil Engineering Construction	15,093	16,949	1,856	12.30
Manufacturing	109,037	100,776	-8,261	-7.58
Transportation and Warehousing	86,429	92,857	6,428	7.44
Water Transportation	1,133	1,355	222	19.59
Transit and Ground Passenger Transportation	19,833	23,300	3,467	17.48
Warehousing and Storage	11,548	14,812	3,264	28.26
Information	43,991	46,318	2,327	5.29
Other Information Services	5,601	6,464	863	15.41
Finance and Insurance	95,201	94,833	-368	-0.39
Real Estate and Rental and Leasing	42,998	43,587	589	1.37

Professional, Scientific, and Technical Services	242,093	284,648	42,555	17.58	
Management of Companies and Enterprises	25,970	27,790	1,820	7.01	
Administrative and Support and Waste Management and Remediation Services	152,676	171,388	18,712	12.26	
Administrative and Support Services	143,154	160,907	17,753	12.40	
Waste Management and Remediation Service	9,522	10,481	959	10.07	
Educational Services	251,316	275,034	23,718	9.44	
Healthcare and Social Assistance	351,939	384,934	32,995	9.38	
Hospitals	114,919	131,306	16,387	14.26	
Arts, Entertainment and Recreation	41,796	45,976	4,180	10.00	
Amusement, Gambling, and Recreation Industries	31,208	34,806	3,598	11.53	
Hospitality and Food Services	207,265	225,678	18,413	8.88	
Repair and Maintenance	23,445	24,985	1,540	6.57	
Religious, Grant making, Civic, Professional, and Similar Organizations	25,169	29,485	4,316	17.15	
Government	283,183	285,740	2,557	0.90	

Source: <http://www.dllr.state.md.us/lmi/iandoproj/>

Maryland's diversified economy offers employment opportunity to individuals with low, high, or specialized skills. The table above illustrates the importance of isolating and targeting those industries most conducive to the provision of solid and viable employment to individuals at various levels of skill. MD SCSEP works with local employment partners to collaborate on best practices to engage, train, and ultimately place low-income seniors in job within industries that have the most potential for job growth. Currently, MD SCSEP is experiencing training assignment success within the following areas:

- Hospitality and Food Services
- Administrative and Support Services
- Healthcare and Social Assistance; and,
- Religious, civic, professional and similar organizations.

In addition to state and local government, these aforementioned areas are where the bulk of MD SCSEP trainees declare interest, receive training, and are ultimately placed for unsubsidized employment.

(2) Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))

#### Aligning MD SCSEP with High Growth Industries in Maryland

The long term projections in the areas of healthcare, administrative and support services, transportation and warehousing are industries of interest to MD SCSEP as these are the industries in which majority of the community service assignments are being developed.

**Table 1.3 – High-Growth Industries in Maryland 2012-2022**

Of all the total industries in Maryland Industry Projections 2012-2022, the chart below summarizes the industries with more growth potential. These industries have a positive and double digit number for their percent change from 2012 to 2022:

<b>Industry</b>	<b>Employment 2012</b>	<b>Employmen t 2022</b>	<b>Percentage Change</b>
Arts, Entertainment and Recreation	41,796	45,976	10.00
Waste Management and Remediation Service	9,522	10,481	10.07
Amusement, Gambling, and Recreation Industries	31,208	34,806	11.53
Administrative and Support and Waste Management and Remediation Services	152, 676	171,388	12.26
Heavy and Civil Engineering Construction	15,093	16,949	12.30
Administrative and Support Services	143,154	160,907	12.40
Hospitals	114,919	131,306	14.26
<b>Industry</b>	<b>Employment 2012</b>	<b>Employmen t 2022</b>	<b>Percentage Change</b>
Other Informative Services	5,601	6,464	15.41
Religious, Grant making, Civic, Professional and Similar Organization	25,169	29,485	17.15
Transit and Ground Passenger Transportation	19,833	23,300	17.48
Professional, Scientific, and Technical Services	242,093	284,648	17.58
Water Transportation	1,133	1,355	19.59
Warehousing and Storage	11,548	14,812	28.26
Wholesale Electronic Markets and Agents and Brokers	15,393	19,744	28.27
Source: <a href="http://www.dllr.state.md.us/lmi/iandopproj/">http://www.dllr.state.md.us/lmi/iandopproj/</a>			

MD SCSEP is very interested in the amusement, gambling, and recreation industry due to its long term job development potential for older workers in the current service area. For example, Rocky Gap Casino opened in May 2013 in Cumberland, Maryland, and the Horseshoe Casino opened in August 2014 in Baltimore City. Both facilities have quickly become employers of choice in their respective regions. The Horseshoe Casino employs 1,700 workers in a variety of roles. Organizational leaders are committed to hiring Baltimore City residents and are offering extensive training specific to various fields, including game dealing, customer service, and food and beverage services.

The program intends to further develop similar opportunities at the National Harbor development project. The program intends to coordinate with the Maryland National Grantee, Senior Service America, Inc., as well as local workforce development initiatives in Prince Georges and Charles counties, to draw participants living within the commuting area to lucrative, long-term job training and unsubsidized employment opportunities.

Occupational growth, which occurs by job without regard to specific industry, will also continue to factor into how MD SCSEP establishes and executes job development partnerships

**Table 1.4 – Occupational Growth Projections 2012-2022**

Occupational Code	Occupational Title	Employment		Projected Annual Percent Growth Rate	Projected Annual Opening	Most Significant Source of Education or Training	Median Annual Wages
		2012	2022				
35-0000	Food Preparation and Serving Related Occupations	210,656	229,491	8.9	100,721	Short-term on-the-job training	19,591
15-0000	Computer and Mathematical Occupations	113,993	132,595	16.3	37,554	Bachelor's degree	93,047
15-1100	Computer Occupations	107,304	124,535	16.1	34,361	Bachelor's degree	N/A
29-0000	Healthcare Practitioners and Technical Occupations	167,842	184,568	10.0	51,904		69,939
25-0000	Education, Training, and Library Occupations	167,783	183,201	9.2	49,975	Bachelor's degree	54,086
13-0000	Business and Financial Operations Occupations	174,080	189,193	8.7	49,390	Bachelor's degree	74,246
35-3000	Food and Beverage Serving Workers	118,360	130,090	9.9	64,113	Short-term on-the-job training	N/A
11-0000	Management Occupations	185,303	196,575	6.1	49,315	Bachelor's degree	112,708

13-1000	Business Operations Specialists	114,803	125, 906	9.7	30,619	Bachelor's degree	N/A
53-0000	Transportation and Material Moving Occupations	153,792	163, 843	6.5	45,423	Short-term on-the-job training	32,278
29-1000	Health Diagnosing and Treating Practitioners	106,814	116, 194	8.8	32,267	Bachelor's degree	N/A
47-0000	Construction and Extraction Occupations	128,298	137, 502	7.2	30,208	Short-term on-the-job training	42,520
39-0000	Personal Care and Service Occupations	95,639	104, 561	9.3	30,843	Short-term on-the-job training	23,098
41-0000	Sales and Related Occupations	271,305	280, 048	3.2	93,001	Bachelor's degree	26,662
43-0000	Office and Administrative Support Occupations	416,603	424, 936	2.0	105,610		36,178
37-0000	Building and Grounds Cleaning and Maintenance Occupations	98,142	106, 366	8.4	28,453	Short-term on-the-job training	24,844

Source: <http://www.dllr.state.md.us/lmi/iandoproj/maryland.shtml>

(3) Discuss current and projected employment opportunities in the state (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))

### Opportunities in Maryland's Healthcare Economy

Maryland has emerged as an international leader in healthcare, support services, and medical innovation. MD SCSEP participants increasingly are seeking training assistance that will help them qualify for healthcare industry-related jobs; therefore, the program will be intensely focused on cultivating and expanding training partnerships throughout the service area. Maryland has about 70 hospitals; of those, 17 hospitals are located in the Baltimore City

service area. There are also three hospitals in Western Maryland and one hospital located in Eastern Maryland within the MD SCSEP service area.

**Table 1.5 – Maryland Hospitals within the DLLR SCSEP Service Area**

Hospitals	Location
Baltimore VA Medical Center	Baltimore City
Bon Secours Hospital	Baltimore City
Johns Hopkins Hospital	Baltimore City
Johns Hopkins Bayview Medical Center	Baltimore City
Kennedy Krieger Institute	Baltimore City
Levindale Hebrew Geriatric Center and Hospital	Baltimore City
MedStar Good Samaritan Hospital	Baltimore City
MedStar Harbor Hospital	Baltimore City
MedStar Union Memorial Hospital	Baltimore City
Mercy Medical Center	Baltimore City
Mt. Washington Pediatric Hospital	Baltimore City
R Adams Cowley Shock Trauma Center	Baltimore City
St. Agnes Hospital	Baltimore City
Sinai Hospital of Baltimore	Baltimore City
University of Maryland Medical Center	Baltimore City
University of Maryland Medical Center Midtown Campus	Baltimore City
University of Maryland Rehabilitation and Orthopedic Institute	Baltimore City
Brandenburg Center	Allegany County
Thomas B. Finan Center	Allegany County
Western Maryland Regional Medical Center	Allegany County
University of Maryland Shore Medical Center at Easton	Talbot County

The Johns Hopkins Hospital has been ranked as one of the nation's top medical institutions for more than two decades. Johns Hopkins Institute, headquartered in Baltimore City, is one of the state's largest private employers; in FY10 the health care system employed 53,352 people worldwide. The University of Maryland Medical Center (UMMC), also located in Baltimore, provides a full range of healthcare services to the Mid-Atlantic Region, including the world renowned R. Adams Cowley Shock Trauma Center.

The flagship academic medical center for the state, UMMC is comprised of 12 hospitals that make up the University of Maryland Medical System. The University of Maryland Medical System employs 8,261 people. Currently, some of the MD SCSEP participants serve in the food service department at UMMC. the goal is to expand the partnership with UMMC and triple the number of training opportunities in the food service department and seek and secure other training opportunities throughout various departments within UMMC.

The table below further illustrates the projected job development (and need for skilled workers) in healthcare industry occupations.

**Table 1.6 – Occupations in the Healthcare Sector with the Largest Anticipated Employment Changes**

Occupation Code	Occupational Title				Education Value*	Median Annual wage
			Employment			
		2012	2022	Change		
29-1141	Registered Nurses	48,337	54,567	6,230	B	\$72,342
43-6014	Secretaries and Administrative Assistants, Except Legal, Medical, and Executive	54,989	58,640	3,651	C	\$38,010
37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	39,759	43,078	3,319	C	\$23,892
31-1014	Nursing Assistants	29,505	32,659	3,154	B	\$28,162
39-9021	Personal Care Aides	13,798	16,545	2,747	C	\$23,201
31-1011	Home Health Aides	11,557	13,814	2,257	C	\$24,805
43-1011	First-Line Supervisors of Office and Admin. Support Workers	31,595	33,571	1,976	C	\$56,829
37-2012	Maids and Housekeeping Cleaners	21,253	23,158	1,905	C	\$22,275
43-6013	Medical Secretaries	11,802	13,431	1,629	C	\$34,405
29-2061	Licensed Practical and Licensed Vocational Nurses	12,752	14,246	1,494	B	\$50,731
39-9011	Childcare Workers	18,971	20,120	1,149	C	\$20,947
11-9111	Medical and Health Services Managers	10,691	11,778	1,087	A	\$99,677
29-1123	Physical Therapists	4,407	5,136	729	A	\$87,972
31-9092	Medical Assistants	9,814	10,444	630	B	\$32,676
29-2034	Radiologic Technologists	4,627	5,099	472	B	\$63,712
21-1093	Social and Human Service Assistants	5,309	5,745	436	C	\$29,565
25-2011	Preschool Teachers, Except Special Education	7,091	7,328	237	B	\$28,719
29-1069	Physicians and Surgeons, All Other	13,007	13,229	222	A	\$168,058
29-2021	Dental Hygienists	3,019	3,137	118	B	\$85,570

43-9061	Office Clerks, General	50,770	50,817	47	C	\$30,420
43-4171	Receptionists and Information Clerks	22,517	22,517	0	C	\$27,167
31-9091	Dental Assistants	5,449	5,335	-114	B	\$39,416

Source: <http://www.dllr.state.md.us/lmi/iandoproj/maryland.shtml>

Employment estimates by occupation are specific to the Healthcare and Social Assistance Sector industries.

\* Education Codes:

- A. Bachelor degree or higher
- B. Postsecondary award or Associates degree
- C. High school or less

### Other Employment Opportunities in Maryland

Almost all of the occupations in Maryland that are projected to grow require either specialized long term training, such as a secondary or postsecondary academic certificate or Bachelor's degree, or short-term on the job training. MD SCSEP anticipates that as more high-skilled baby boomers age in the state, the program will experience the need to develop higher-level training assignments to attract and place older adults with college degrees who may also be experiencing poverty. However, the majority of current participants have no college degree and are therefore prime candidates for training opportunities that occur on the job or have shorter-term qualifying certification periods. The occupations that require short-term on the job training include food preparation and service related occupations, transportation and material moving occupations, construction and extraction occupations, personal care and service occupations, and building and grounds cleaning and maintenance occupations.

Occupations in the food service industry such as hosting, waitstaff, food prep workers, and cooks require limited education and generally compensation tends to be on the lower end of the wage spectrum. The Maryland General Assembly has increased minimum wage above the federal level to \$9.25 per hour, and it is slated to increase yearly until it reaches \$10.10 per hour effective July 1, 2018. (This minimum wage increase excludes certain food service occupations.) Under MD SCSEP, several participants are currently training at senior centers, hospital cafeterias, and restaurants as food preparers, food handlers, and cooks- roles that traditionally are paid at least minimum wage. MD SCSEP plans to enroll eligible participants in food handlers' certification programs, which offer basic food safety courses. The completion of certification programs strengthens the participants' ability to secure and maintain unsubsidized employment.

Maryland's economic activity is strongly concentrated in the tertiary, or service, sector, and this sector is a critical partner in helping workers gain unsubsidized employment. One major tertiary service activity is transportation, centered on the Port of Baltimore and its related rail and trucking access. As a result of its proximity to the Port of Baltimore, the Chesapeake Bay, the Atlantic Ocean, the nation's capital, and the major distribution routes along the East Coast,

Maryland's transportation infrastructure, including its international airport hub as well as its freight rail system, is a key to the region's economic vitality and quality of life.

The transportation and material moving industry is also projected to be one of the fastest growing industries in Maryland. In this sector, the biggest job opportunities will be in warehousing and storage, transit, and ground passenger carriage. Freight and material movers, hand packers, motor vehicle operators, truck drivers, and bus drivers are just some of the opportunities that will be created by anticipated growth in these industries. For participants who are interested in pursuing these occupations and demonstrate commitment to skills training, MD SCSEP in certain circumstances, will help them acquire a valid training and/or certifications. This could include assistance with obtaining a commercial driver's license (CDL) learner's permit or paid enrollment into a commercial driver's education class. MD SCSEP makes every effort to assess and extend paid training opportunities according to funding availability every PY. Another service area that is anticipated to grow is personal care and hygiene. According to the U.S. BLS, overall employment of barbers, hairdressers, and cosmetologists is projected to grow ten percent from 2014 to 2024, faster than the average for all occupations. The need for barbers will stem primarily from an increasing population, which will lead to greater demand for basic hair care services. Overall job opportunities for personal care and service are expected to grow. A large number of job openings will stem from the need to replace workers who transfer to other occupations, retire, or leave the occupation for other reasons.

Where appropriate, MD SCSEP will make an effort to ensure participants interested in pursuing these occupations can train at nursing home facilities. These training locations are ideal because patients in the long term care facilities rely on personal hygiene service providers to meet patients' personal needs. MD SCSEP may also be able to assist participants in training for their barber or cosmetology license. Once certified, these participants can seek unsubsidized employment with long term care facilities such as rehabilitative facilities, nursing home facilities, and private assisted living homes.

### **Current and Projected Employment Opportunities in the State of Maryland**

During the most recent economic downturn Maryland lost more than 8,000 businesses, and Maryland's unemployment nearly doubled. Maryland is committed to restoring its economy and creating jobs. Over the past year, Maryland has created an additional 53,000 jobs, the most in the mid-Atlantic region. For a glance of Maryland's current employment opportunities see the chart below:

**Table 1.7 – Maryland Economy at a Glance**

Data Series	June 2015	July 2015	Aug 2015	Sep 2015	Oct 2015	Nov 2015
<b>Labor Force Data</b>						
Civilian Labor Force	3,151.8	3,154.2	3,152.8	3,152.1	3,158.1	3,167.5
Employment	2,987.5	2,991.1	2,991.8	2,992.1	2,996.4	3,003.7
Unemployment	164.3	163.1	161.1	160.0	161.7	163.8
Unemployment Rate	5.2	5.2	5.1	5.1	5.1	5.2

Nonfarm Wage and Salary Employment						
Total Nonfarm	2,661.9	2,671.6	2,674.3	2,674.0	2,685.9	2,689.5
12-month percent change	1.6	2.1	2.0	1.8	2.0	2.0
Mining, Logging and Construction	157.7	158.6	157.9	158.2	159.6	159.9
12-month percent change	4.1	4.9	4.0	4.1	4.8	4.7
Manufacturing	102.0	102.2	101.6	101.2	103.0	104.2
12-month percent change	-1.5	-1.1	-1.6	-2.1	-0.2	1.6
Trade, Transportation and Utilities	463.2	461.5	461.6	460.8	462.1	464.0
12-month percent change	1.7	1.4	1.3	1.2	1.3	1.6
Information	37.8	38.2	37.3	37.3	37.5	36.7
12-month percent change	0.8	1.1	-2.6	-0.3	1.1	-0.8
Financial Activities	144.3	146.0	147.6	146.2	147.2	146.9
12-month percent change	0.0	1.0	2.1	1.4	1.9	1.9
Professional and Business Services	431.1	437.9	434.5	433.3	437.3	438.2
12-month percent change	1.6	3.0	2.3	2.0	2.8	2.5
Education and Health Services	437.8	439.6	443.2	444.2	443.2	443.5
12-month percent change	2.7	2.9	3.4	3.5	2.8	2.5
Leisure and Hospitality	271.0	270.3	266.9	267.4	271.0	270.2
12-month percent change	4.5	4.3	3.1	2.5	2.9	2.5
Other Services	110.1	110.6	111.6	111.1	111.5	111.9
12-month percent change	-1.9	-1.4	-0.5	-1.2	-0.9	-0.7
Government	506.9	506.7	512.1	514.3	513.5	514.0
12-month percent change	0.2	1.0	1.8	1.6	1.3	1.4

Source: <http://www.bls.gov/regions/mid-atlantic/maryland.htm#tab-1>

MD SCSEP anticipates that it will be able to continue to assist older workers in gaining new skills and employment opportunities in line with the economic projections for the state. The program will utilize industry and occupational growth information to recruit new host agencies and develop new training partnerships; better allocate and prioritize the use of training funds across a broad spectrum of participant training needs; and to recruit effective employment partners in public and private industries and organizations.

### (b) Service Delivery and Coordination

#### Section 2: Service Delivery and Coordination

The SCSEP, as administered by the state and national grantee, is the main focal point of service delivery in job training for low-income older workers. As such, it is important that MD SCSEP closely coordinate the program activities with WIOA Title I and Title III programs; programs under the Older Americans Act (OAA); private and public entities; labor market and job training initiatives; community organizations; and other state programs. Program coordination ensures

the reduction of barriers to participation for full spectrum analysis and resource referral process to participants receiving services.

(1) A description of actions to coordinate SCSEP with other programs. This may alternatively be discussed in the state strategies section of the strategic plan, but regardless of placement in document, must include:

#### **Planned actions taken to coordinate SCSEP with other programs**

MD SCSEP plans to coordinate activities with other WIOA Title I and Title III programs, community and faith based initiatives, and programs authorized under the Older Americans Act.

Specific actions are being taken to integrate the program into DLLR's workforce development system and AJCs (AJCs). The Labor Exchange Administrators (LEAs) and the Job Service Supervisors in Western, Southern, Upper Shore and Baltimore City will become more involved in overseeing local programs. The SCSEP staff (Employment Specialists and Senior Service Liaisons) will engage applicants into the workforce development system before being vetted into the program. The applicants will also be orientated to the AJCs through the completion of the online orientation.

Upon completion of orientation, applicants will attend workshops including the Dependable Strength, My Next Move and RESEA workshops if space allows. The LEAs will refer eligible adults to Title I for assessments upon completion of these workshops. Once eligible and enrolled, the participant will be assigned to a case manager for career guidance to ensure they are adhering to their Individual Employment Plan.

In addition, to support coordination efforts, MD SCSEP will collaborate with AJC staff to ensure that issues of employment and training are considered in Local Area plans. MD SCSEP will also provide, as needed, advice and technical assistance to Labor Exchange Administrators.

Finally, MD SCSEP will train local staff, including participant staff, to engage potential SCSEP participants by supporting local programs for seniors. Senior activity fairs, employment fairs, support services open houses, in addition to host-agency hosted community events will be announced, staffed and debriefed by MD SCSEP local staff as necessary.

(A) Planned actions to coordinate activities of SCSEP grantees with WIOA title I programs, including plans for using the WIOA AJC delivery system and its partners to serve individuals aged 55 and older. (20 CFR 641.302(g), 641.325(e))

#### **Coordination with other WIOA Programs**

At the present, MD SCSEP and the DLLR, DWDAL are in active partnership with the AJCs (AJCs) located across Maryland. The AJCs provide comprehensive services to both job seekers and businesses. For the eleven counties that MD SCSEP serves, partnerships exist at five full service AJCs including:

- 1) Allegany County AJC,
- 2) Charles County Southern MD Job Source,

- 3) Talbot County AJC,
- 4) Washington County AJC, and
- 5) Baltimore City Northwest AJC (re-entry center for ex-offenders).

To assist participants with SCSEP related business and job search activities, SCSEP staff are co-located at the AJCs in the service areas.

MD SCSEP has integrated with the program into DLLR AJCs as mentioned above. To strengthen these partnerships, MD SCSEP staff periodically schedule joint meetings with the Labor Exchange Administrators at these AJCs to find ways to work together more efficiently. Joint meetings will also ensure that all participants receiving services within the local AJCs become informed of the wealth of supportive services.

(B) Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the state under the other titles of the Older Americans Act (OAA).

(20 CFR 641.302(h))

#### **Coordination with other OAA Programs**

Congress passed the Older Americans Act (OAA) in 1965 in response to concerns by policymakers about a lack of community social services for older adults. Under Title V, the OAA also included community service training and employment for low-income older Americans. MDa administers and provides oversight of numerous programs that are authorized by the Older Americans Act. To help coordinate activities, the Secretary and the Deputy Secretary of the Maryland Department of Aging are fully aware of the Agency activities conducted under other titles of OAA and will ensure that all opportunities for cooperation and leverage of resources are maximized.

In addition, the MD SCSEP program manager will make an effort to collaborate with the program managers from other titles of OAA such as the Aging and Disability Resource Center (known as Maryland Access Point), the Long Term Ombudsman Program and the Senior Health Insurance Assistance Program (SHIP) to better serve the same population. MD SCSEP participants are currently being considered for specialized training with county-level ombudsman coordinators. Participants in this customized training partnership will learn Medicare and Medicare supplemental policies, Medicare prescription drug programs, long-term care insurance, and private health insurance to answer questions and provide assistance to older Marylanders. This training may also lead SCSEP participants to train as ombudsman representatives. MD SCSEP anticipates that each participant selected for this opportunity will become certified to visit residents in the long term care facilities by receiving adequate training and preparation to effectively carry out the responsibilities of the training assignment.

Calendar coordination for outreach programming at the senior management level of MDa will also be implemented to maximize any opportunities for shared staffing and service recruitment resources statewide. If these activities occur outside of the MD SCSEP service area, the program manager will make a standard referral or request, as needed, to SSAI for participation and follow-up.

(C)Planned actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith-based organizations,

transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))

### **Coordination with Public and Private Organizations**

MD SCSEP participants gain new work experience in a variety of community service activities at government agencies, non-profit and public facilities, including schools, hospitals, senior centers, churches, and community action centers.

**Table 2.2 – MD SCSEP Current Host Agencies**

<b>Current Host Agencies</b>	<b>County</b>	<b>Type</b>
Allegany County Board of Education	Allegany	Government
Allegany County Human Resources Development Commission, Inc.	Allegany	Not-for-profit
Allegany County AJC AJC	Allegany	Government
County United Way	Allegany	Not-for-profit
Horizon Goodwill Industries	Allegany	Not-for-profit
The Salvation Army Cumberland	Allegany	Not-for-profit
Maryland Department of Aging	Baltimore City	Government
Baltimore City Community Action partnership	Baltimore City	Government
Bea Gaddy Family Center	Baltimore City	Not-for-profit
Department of Assessment and Taxation	Baltimore City	Government
DHS	Baltimore City	Government
Eating Together	Baltimore City	Government
Eutaw Marshburn Elementary	Baltimore City	Government
Fusion partnership Inc. (Clean Slate America)	Baltimore City	Not-for-profit
Govans Ecumenical Development Corporation	Baltimore City	Not-for-profit
Greater Gethsemane Missionary Baptist Church	Baltimore City	Not for profit
Mayor's Office of Employment Development	Baltimore City	Government
McVet	Baltimore City	Not-for-profit
NAACP	Baltimore City	Not for profit
Northwest Community Action Agency	Baltimore City	Government
Older Women Embracing Life, Inc. (OWEL)	Baltimore City	Not-for-profit
Olivet Baptist Church	Baltimore City	Not-for-profit
Park Heights Renaissance, Inc.	Baltimore City	Not for profit
Reading partners – Callaway Elementary	Baltimore City	Not for profit
University of Maryland Medical Center	Baltimore City	Not-for-profit
Zion Baptist Church	Baltimore City	Not for profit
Garrett County Health Department	Garrett	Government
Garrett County Lighthouse	Garrett	Not-for-profit
Queen Anne's County Housing Authority	Queen Anne's	Government
Queen Anne's Department, Area Agency on Aging	Queen Anne's	Government
Leonardtown Library	St. Mary's	Government
St. Mary's Adult Medical Day Care	St. Mary's	Not-for-profit

St. Mary's County Office of Aging	St. Mary's	Not-for-profit
Tri-County Youth Services Bureau, Inc.	St. Mary's	Not-for-profit
DLLR Talbot Career Center	Talbot	Government
Housing Commission of Talbot County	Talbot	Government
Neighborhood Service Center	Talbot	Not-for-profit
ReStore Habitat for Humanity Choptank	Talbot	Not-for-profit
Talbot County Health Department	Talbot	Government
Upper Shore Aging, Inc.	Talbot	Not-for-profit
American Red Cross Region Washington County Chapter	Washington	Not-for-profit
Habitat for Humanity ReStore	Washington	Not-for-profit
Housing Authority of Washington County	Washington	Government
Interfaith Service Coalition of Hancock, Inc.	Washington	Not-for-profit
Office of Consumer Advocates	Washington County	Not-for-profit
Robert W. Johnson Community Center, Inc.	Washington County	Not-for-profit
United Way of Washington County	Washington County	Not-for-profit
Washington County Commission on Aging	Washington County	Not-for-profit
YMCA – Hagerstown	Washington County	Not-for-profit

In the last PY, MD SCSEP has provided over 74,454 community service hours to public and non-profit agencies, allowing them to enhance provision of needed services in the community. The participants train an average of 20 hours a week and are paid \$9.25 an hour, the current state minimum wage. This training serves as a bridge to unsubsidized employment opportunities for participants.

During the course of the next two years, MD SCSEP will continue to promote collaboration and coordination among private and public organizations. MD SCSEP will add more state and local government departments and agencies as new host agencies. To support the mandate to better serve minority populations, host agencies that serve in languages other than English will be sought as MD SCSEP prepares to expand job training activities amongst older Asian and Hispanic seniors.

MD SCSEP will also continue to utilize the Individual Employment Planning process to target specific private and public entities whose work aligns with participant trainees' employment goals. Starting July 2018, MD SCSEP has been consider to leverage On the Job Experience (OJE) contracts with private, for-profit organizations. These contracts allow MD SCSEP to expand training opportunities to participants approaching job readiness by providing training funds at or near market salary for up to 12 weeks. OJEs are considered successful if the participant, at the conclusion of training and assessment of effectiveness, is converted to an unsubsidized hire working 20 or more hours per week at a salary not below the market rate.

MD SCSEP will also coordinate support services information with the representatives of the following local AARP Maryland Chapters located throughout the service area:

Allegany County	AARP Chapter 2400 Allegany County St. Lutheran Church 1601 Frederick Street Cumberland, MD 21502-1035
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Baltimore City	AARP Chapter 4636 Baltimore City Baltimore Community College 6764 Reisterstown Road, Room 133A Baltimore, MD 21215-2306
Caroline County	AARP Chapter 0915 Caroline County Church of the Nazarene 10660 Greensboro Road Denton, MD 21629-3309
Charles County	AARP Chapter 3845 Jaycees Community Center 3090 Crain Highway Waldorf, MD 20601-2800
Kent County	AARP Chapter 3635 Kent County Upper Shore for the Aging 100 Schaubert Road Chestertown, MD 21620-1148
Talbot County	AARP Chapter 1601 Talbot County 400 Brookletts Avenue Easton, MD 21601-3404

MD SCSEP intends to make participants aware of AARP member benefits available in their communities. Further, MD SCSEP will identify the local employers in each of the county jurisdictions that signed the AARP Employer Pledge. Employers that have signed the pledge do so to reflect value of experienced workers and a belief in equal opportunity for all workers, regardless of age. For example, in Baltimore City, the Maryland Women's Heritage Center and DLA Piper, a national law firm, are two of the employers that signed the AARP Employer Pledge. To establish and inform their recruitment of older workers in Maryland, MD SCSEP will partner with these employers in support of targeting these workers for current and future staffing needs.

Under the guidance and oversight of Maryland Department of Aging, the nineteen Area Agencies on Aging (AAA) administer Older Americans Act programs at the local level; however, eight of the nineteen AAAs are in the SCSEP service area. Of these eight, currently six AAAs serve as host agencies for the participant trainees. These local agencies advocate for older adults, deliver services and offer advice and feedback on aging issues. The community service assignments are mostly office and administrative support, food preparation and service and community and social services. On a few occasions the AAA hired participant trainees upon the completion of their current training assignments.

(D)Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

## **SCSEP and Current Labor Market and Job Training Initiatives**

DLLR Labor Exchange Administrators (LEA) will work directly with the SCSEP staff to analyze current labor market in each of the respective counties. LEAs will increase the SCSEP staff's program knowledge about DLLR initiatives such as Apprenticeship, EARN Maryland, Wagner-Peyser and WIOA Programs. The goal is for the SCSEP staff to learn how to assess the participants' needs and select the right job training initiative.

The SCSEP staff will regularly attend the local staff meetings to share job leads and potential participants actively seeking jobs.

(E)Actions to ensure that SCSEP is an active partner in the AJC delivery system and the steps the state will take to encourage and improve coordination with the AJC delivery system. (20 CFR 641.335)

### **SCSEP and Maryland's AJC Service Delivery System**

SCSEP remains a partner under WIOA and is a viable part of the AJC delivery system. The MD SCSEP staff who are co-located in the AJCs (formerly known as AJC centers) will continue to provide the career services including determination of eligibility; outreach intake and orientation; initial assessment of skills, aptitudes, abilities, and supportive services needs; and job search and job placement.

On a regular basis, MD SCSEP will encourage and improve coordination in the AJC delivery system in the following ways:

- Identify and collaborate with workforce development professionals who can assist with Title III service delivery and other employment-related services, training referrals, job openings, resume writing, mock interviews and career counseling;
- Screen and inform all new SCSEP applicants and current participants about DLLR's Adult Learning and Literacy Services (AELS). The Office of Adult Learning help Maryland adults who lack a high school diploma, who lack basic reading, writing, and mathematical skills and/or who does not speak English as their first language.
- Register new applicants and participants in MWE website and case manage applicants and participants progress using MWE.
- partner with the Business Service Representatives in the AJCs to conduct outreach to local businesses to promote the program and the current participants.

(F) Efforts to work with local economic development offices in rural locations.

**Efforts the state will make to work with local economic development offices in rural locations**

MD SCSEP continues to improve service delivery in rural areas. To further support local economic development in those areas, MD SCSEP will utilize program and participant staff to join local leaders in informing the business community of human capital and job training resources. MD SCSEP will also advocate for the expansion of support services in transportation to specifically connect older workers residing in rural areas with local employment opportunities.

Coordination with other OOA programs, as mentioned above, will ensure that MD SCSEP maintains and expands the presence as an employment related service provider in rural areas. Where feasible, MD SCSEP will seek to be the employment partner of choice for businesses as well as older workers in rural Maryland.

(2) The state's long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (May alternatively be discussed in the state strategies section of strategic plan.)

### **Long-term Strategies for Unsubsidized Employer Engagement for SCSEP in Maryland**

DLLR will make SCSEP participants a part of their pipeline of talent identified by business services staff. Business services staff will be trained to understand the program and participants as potential candidates for openings.

MD SCSEP will also continue to cultivate and grow relationships with host agency partners who have demonstrated their commitment to employing older workers by hiring SCSEP participants. Proper exit and follow-up procedures are critical to this area of employer engagement and will be measured as a job performance standard of MD SCSEP staff. The program aims to develop an internal network of training and job referral completely comprised of proven hiring and training partners. These partners will assist MD SCSEP in advocating for older workers as viable human capital for Maryland businesses and agencies, and the program will rely on them to increase host agency, training partner, and employer recruitment and retention.

### **Senior Service America, Inc. (SSAI) Long-Term Strategy for Engaging Employers**

SSAI's subgrantees have well-established partnerships with local Chambers of Commerce. Subgrantees often attend meetings in order to network with local business representatives. Through training provided by SSAI, subgrantees regularly get on a Chamber's agenda to engage employers by promoting both SCSEP and job ready participants. In PY2014, SSAI Field Support Program Officers introduced an Employer Outreach Kit to a pilot group of subgrantees. The kit includes both three-minute and ten-minute talking points, a PowerPoint presentation, general presentation tips, suggested wording for an elevator pitch, and advice on how to handle both cold and warm calls with employers. This kit has been proven to save a great deal of preparation time and has increased subgrantee staff confidence about engaging employers. Further improvements to the kit will be made as MD SCSEP expands its use in future PYs.

To promote employer outreach, SSAI Program Officers also work with subgrantees to identify other employer organizations in order to increase the visibility of SCSEP. For example, SSAI promotes subgrantee engagement with local chapters of the Society for Human Resource Management (SHRM), a professional association of human resources professionals from various employers. These professionals are usually involved with hiring and tend to be focused on ensuring a diverse workforce, including mature workers. In addition, many of these SHRM chapters have a committee of volunteers willing to give their time to nonprofits. They can be a great resource for educating participants about what their companies look for in a new employee, helping prepare for interviews, and writing résumés that will get read.

Other SSAI employer outreach training focuses on showing subgrantees how to approach the hidden job market by establishing relationships with their local, county, and state economic development councils and accessing their press releases of future or growing business announcements. SSAI staff trains subgrantees to approach these employers with the goal of establishing relationships as business partners. Job Development training of subgrantees will remain multi-focused. One area of focus will continue to promote the identification and targeting of local employers by using the internet, especially in rural areas. Another focus will be on the basics of how to conduct employer outreach. The training to be provided includes group activities, role playing, and videos about job development. Another area of focus will be to provide technical assistance geared towards developing advanced networking skills of both subgrantees and SCSEP participants.

Furthermore, as MD SCSEP increases employer engagement, SSAI will also increase exploration of on-the-job-experience (OJE) as a method of expanding employer engagement. While OJE has not been widely utilized by the subgrantees in the past, the Program Officers will actively promote OJE as a tool for subgrantees to use in future PYs to gain more unsubsidized jobs for participant job seekers.

**Source:** Senior Service America, Inc.

### **SSAI's Strategies for Preparing Participants for Unsubsidized Jobs**

SSAI's Program Officers will further expand subgrantees capabilities to use a multi-pronged approach to prepare participants for unsubsidized jobs. SSAI Program Officers develop turnkey tools that a subgrantee may use when meeting with participants. For example, a presentation has been developed on how to navigate a job fair that a subgrantee can deliver at a participant meeting. Additionally, Program Officers provide sample agendas and activities, as well as facilitate job club meetings at subgrantee locations. Program Officers are often asked to present at participant meetings. Topics may vary and can include interviewing techniques, résumé writing tips, approaching the hidden job market, using social media in a job search, and completing online job applications.

SSAI has developed and launched a new tool to increase the support SSAI subgrantees offer participants. SSAI launched a web-based job application practice tool for SCSEP participants across its partnership network. This tool provides a safe and comfortable opportunity for a participant to practice completing an online job application. Tips are provided, and participants can save multiple versions of the application and customize them to fit jobs of interest. An opportunity to try uploading a document is also a part of the experience. Once the application is completed and "submitted," the participant receives an email that provides them a copy of their application. Participants are advised to review with their Project Director the information they have entered. In this way, the subgrantee staff is provided an excellent opportunity to coach on information that should or should not be submitted to an employer. The participant can also print their own copy of the application they submitted. An additional value of this is that the participant can use this copy as a reference when completing an application in the future. The initial feedback during a pilot phase was quite positive. SSAI continues to train its subgrantees on how to use the tool effectively.

**Source:** Senior Service America, Inc.

(3) The state's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))

### **The Long-term Strategy for Serving Minorities under MD SCSEP**

Service to minorities under SCSEP is measured annually by DOL. The Service to Minorities data report helps guide and inform efforts to engage diverse low-income seniors in job training activities. The most recent Service to Minorities report for MD SCSEP highlighted gaps in program reach to Asian, Hispanic, Native Hawaiian, and Pacific Islander populations. In response, MD SCSEP will increase efforts to target Asian Americans age 55 years and older for program participation. The local MD SCSEP staff in Baltimore City, Charles County, and St. Mary's County will use faith-based and social organizations as recruitment sources since minority groups who experience a language barrier often look to these organizations to connect with people of similar backgrounds.

MD SCSEP will identify and target community organizations who serve in languages other than English to recruit potential participants as well as host agencies. Specifically targeting these organizations will expand the availability of training options for seniors who experience LEP as a barrier to employment. This may also create a new opportunity in utilizing OJEs to engage businesses who specialize in multilingual operations to develop training opportunities for older workers.

In addition, MD SCSEP will seek the advice and help of the Maryland Office of Asian Pacific American Affairs on issues related to the Asian Pacific American population of Maryland, including economic and workforce issues.

One national economic disparity is that 10.4 percent of Asian Americans live at or below the poverty line, including 12 percent of adults age 65 and over. Among Asian Americans, social and economic disparities are significantly greater for immigrant communities from Laos, Cambodia, and Vietnam, who came to the United States in large waves during the latter half of the 20<sup>th</sup> century. MD SCSEP intends to address employment needs in underserved population by targeting existing support organizations already in service to them.

(4) A list of community services that are needed and the places where these services are most needed. Specifically, the plan must address the needs and location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)

### **Exact Placement of Most Needed Community Services**

Community services that support employment activity continue to be of critical need to the MD SCSEP service area. The most needed community support service throughout the MD SCSEP service area is for transportation. While Baltimore City MD SCSEP participants experience a variety of public and private transportation options, many low-income seniors residing in the remaining areas do have access to a regional interconnected transportation system. MD SCSEP participants experience a limitation in training options and future placement due to unmet transportation needs in the community.

Other services that are needed throughout the service area are focused on the availability of fresh, affordable food; access to affordable and accessible healthcare; the availability of food service to persons who are home bound or limited mobility; the availability of affordable housing for seniors; the availability of postsecondary training options, e.g. certification and community college programs; and the availability of programs to support literacy and English proficiency. These services are needed in all ten counties in the MD SCSEP service area. In Baltimore City, the primary need is affordable senior housing in lieu of the established transportation resources.

(5) The state's long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the state, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR 641.302(k))

#### **Long-term Strategies to Improve MD SCSEP Services, including Planned Long-term Changes to the Design of the Program with the state**

The state's long-term strategy to improve SCSEP services is to integrate the program into DLLR's workforce delivery system. At the present, the state is exploring one of two options 1) creation of a generic SCSEP application in MWE or 2) combining the applicant profile form and the SCSEP intake into a fillable pdf application, which allows SCSEP field staff can complete the intake and the onboarding document electronically and submit the package to the home office for processing. This strategy will likely help to expedite the enrollment process and streamline the process.

The LEAs will be more involved in overseeing the local programs. The Employment Specialists and Senior Service Liaisons will report directly to the LEAs or the Job Service Supervisors. The SCSEP Program Manager will monitor and provide technical assistances to the local SCSEP team to ensure they meet and exceed program expectations. The SCSEP Program Manager will also ensure that all current participants in the program rotate after one year in a training assignment.

Lastly, the state is evaluating three current work processes for the program including 1) participant onboarding and 2) participant departures and 3) host agency recertifications. The state plans to develop standardized process that all field staff can implement and follow to improve work efficiency.

MD SCSEP will better align the design of the program to work more closely with community colleges to expand training opportunities for older workers throughout the service area. The program would like to maximize the free or low-cost training options available to older Marylanders at these organizations.

MD SCSEP will continuously assess ways to improve SCSEP service delivery, including measuring the effectiveness of staff, quality of host agency partnerships and training outcomes, and placement performance. Annually, all MD SCSEP staff will be evaluated on their work performance in accordance with the standards of their agency as well as in relation to program performance goals articulated by DOL. Further, MD SCSEP will coordinate a combined employer engagement initiative with SSAI to highlight SCSEP operations in Maryland. The

goal of this initiative is to ensure that both SCSEP grants in Maryland meet the “entered employment” performance goal annually, in every jurisdiction in the state.

(6) The state’s strategy for continuous improvement in the level of performance for SCSEP participants’ entry into unsubsidized employment, and to achieve, at a minimum, the levels specified in OAA Section 513(a)(2)(E)(ii). (20 CFR 641.302(f))

### **Strategies for Continuous Improvement in Unsubsidized Placement Performance for MD SCSEP Participants**

To maximize a participant’s opportunity to enter into unsubsidized employment, MD SCSEP intends to implement several strategies to improve placement performance, including:

- Educate and empower host agencies to value older workers and where possible, hire MD SCSEP participants;
- Encourage MD SCSEP participants to pursue and participate in community college courses and/or certificate training programs;
- Provide programmatic information sessions for local businesses and potential employers to increase awareness of the MD SCSEP brand in the counties within the service area; and
- Charge local MD SCSEP staff with cultivating relationships with local businesses as potential OJE partners in each jurisdiction.

### **(c) Location and Population Served, including Equitable Distribution**

#### **Section 3: Location and Population Served, including Equitable Distribution**

Maryland is a unique state comprised of 23 counties and the City of Baltimore, bordering the District of Columbia, Delaware, Pennsylvania, and Virginia. The majority of Maryland’s population is concentrated in the cities and suburbs surrounding Washington, DC, and Maryland’s most populous city, Baltimore.

Every PY, USDOL employs a formula to determine the number of SCSEP participant slots to be awarded to a state or national grantee, by county and population distributed over urban and rural areas of a particular state. That number seeks to provide the grantee with a balanced number of slots for participation in areas that are defined as urban or rural by the United States Census. “Equitable Distribution” refers to the grantees’ ability to administer SCSEP fairly and equitably amongst older workers residing in urban and rural zip codes within their service area over the duration of the PY.

In this section, MD SCSEP will discuss current equitable distribution and participation rates as well as define strategies to increase participation throughout the state.

(1) A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))

#### **The Localities and Populations for which Projects, authorized by Title V, are Most Needed**

The Maryland DLLR oversees and administers the SCSEP for the following counties: Baltimore City, Allegany, Garrett, Washington, Charles, Calvert, St. Mary’s, Caroline, Kent, Talbot and Queen Anne’s counties. This territory stretches from the mountainous western edge of the state

(Allegany, Garrett and Washington counties), bordering Pennsylvania, Virginia and West Virginia, through north central Maryland (Baltimore City) onto Southern Maryland (Calvert, Charles and St. Mary's counties) and the Eastern Shore (Caroline, Kent, Queen Anne's and Talbot counties).

The population that benefits from MD SCSEP are individuals 55 years and older who are unemployed, low-income, disabled, severely disabled, frail, veterans, homeless or at risk of homelessness, and individuals who possess LEP, low literacy skills, and who live in an area of persistent unemployment.

(2) List the cities and counties where the project will be conducted. Include the number of SCSEP authorized positions and indicate where the positions changed from the prior year.

**Table 3.1 – MD SCSEP Authorized Position by County:**

<b>Counties</b>	<b>PY 2015 Authorized Positions</b>	<b>PY2014 Authorized Positions</b>	<b>Changes in the Authorized Positions</b>
Allegany	13	14	-1
Baltimore City	35	35	0
Calvert	7	7	0
Caroline	7	6	+1
Charles	9	9	0
Garrett	8	8	0
Kent	4	4	0
Queen Anne's	4	4	0
St. Mary's	8	8	0
Talbot	5	5	0
Washington	23		0

		23	
<b>Total</b>	<b>123</b>	<b>123</b>	<b>0</b>

(3) Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

### Current Slot Imbalances and Proposed Steps to Ensure Equity

The number of authorized positions for each county is determined by the latest census data. Using the USDOL “Tables by state” on www.scseped.org, a calculation of the variance was determined between the authorized positions and the number of current enrollments by county. SCSEP defines significant variance as any city or counties with a -50 percent or +50 percent or more variance.

**Table 3.2 – PY15Q2 Equitable Distribution Reportable 3.2.1 – Currently Underserved Counties**

FIPS	County	Authorized Positions (AP)	Number of Current Enrollments	Variance
24001	Allegany	13	12	-1 (-8 percent)
24009	Calvert	7	3	-4 (-57 percent)
24011	Caroline	7	2	-5 (-71 percent)
24023	Garrett	8	7	-1 (-13 percent)
24029	Kent	4	2	-2 (-50 percent)
24035	Queen Anne's	4	3	-1 (-25 percent)
24037	St. Mary's	8	7	-1 (-13 percent)
24043	Washington	23	16	-7 (-30 percent)

Calvert, Caroline, and Kent are the three counties that are significantly under enrolled as seen in Table 3.2.1. Kent and Caroline County are a part of the Eastern Shore of Maryland. Calvert County is located in Southern Maryland. MD SCSEP will direct the focus on increasing enrollment in these three counties which have met the threshold of significant variance of -50 percent or more. The reason for the significant variance is the decline and change of the demographics for older adults in that region. Kent County has become more populated with recent retirees whose income levels exceed program income criteria; therefore, it is difficult to identify and enroll applicants that meet SCSEP income eligibility criteria.

To increase enrollment, MD SCSEP will collaborate with Upper Shore Aging Inc., the Area Agency on Aging (AAA) in that geographical area. MD SCSEP staff will work closely with the Maryland Access Point (MAP) coordinators to develop a referral system for employment resources. For Calvert County, MD SCSEP staff will also partner with the AAA, the Calvert County Office on Aging, to develop a similar referral system.

**Table 3.2.2 – Current Over-served Counties**

FIPS	County	Authorized Positions (AP)	Number of Current	Variance
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			Enrollments	
24510	Baltimore City	35	53	+18 (51 percent)
24017	Charles	9	10	+1 (11 percent)
24041	Talbot	5	11	+6 (120 percent)

MD SCSEP will closely monitor the equitable distribution in all counties with variances, mainly focusing on Talbot County. MD SCSEP will work closely with the participants in Talbot County, which has a variance of 120 percent, to assist them one on one with pursuing unsubsidized employment prior to their durational limit. According to SCSEP Performance and Results QPR System four of the eleven participant trainees' durational limits will end in PY17, which will reduce the variance from 120 percent to 40 percent. The possible reason for the over enrollment in this county is because the MD SCSEP staff overcompensated in Talbot county to make up for the difficulty of finding eligible participant trainees in Kent and Caroline Counties. MD SCSEP will make every effort to ensure that equitable distribution is maintained, regardless of over-enrollment, throughout the service area over the duration of the PY. To do this, enrollments will be monitored and a quarterly assessment of slot availability will determine best practices to support program participation.

#### **Senior Service America, Inc. (SSAI's) Current Slot Imbalances and Proposed Steps to Correct Inequities to Achieve Equitable Distribution**

SSAI monitors their subgrantees' equity status using a variance +/- 4. SSAI staff counsel subgrantees monthly as to the status of the variance and provide technical assistance to ensure that the subgrantee will serve the number of authorized positions per county by June 30, 2016. In counties that are under enrolled (under equity), such as Frederick, SSAI's subgrantee Jewish Council for the Aging has approximately 11 modified authorized positions. To date, the subgrantee has served four participants from Frederick and has until June 30, 2016 to enroll at least seven more in that county to ensure the SCSEP resources intended for Frederick are fully utilized. SSAI staff confers with subgrantees on issues related to service such as: recruiting new host agencies; conducting outreach to attract applicants to the program; and figuring out program operations issues that may be impacting enrollment of new participants.

In counties where an SSAI subgrantee is over enrolled (over equity) such as Prince Georges, SSAI staff look review both the total variance as well as the "snapshot variance" taken from SPARQ at the end of each quarter. SSAI staff would not take any action with regard to Prince Georges because the subgrantee is currently serving 45 of 47 participants and has done an excellent job of extending SCSEP resources to achieve 134 percent service level in that county so far this PY. However, in a county such as Wicomico, located on the far Eastern Shore, SSAI staff is working with their subgrantee to stop enrolling new participants in Wicomico and instead focus on exiting participants into unsubsidized jobs and improve equity (12 modified authorized positions) over time through attrition. SSAI staff would advise this subgrantee to enroll new participants from Worcester County instead.

**Source:** Senior Service America, Inc.

**Table 3.3 – SSAI Equitable Distribution Report – PY2015**

Subgrantee Name	County	PY15 Authorized Slots	PY15 "ball park" Modified Authorized Slots by County	Served Participants from July 1, 2015 to Report Date	Variance (+/-4 highlighted)	Active Participants as of Report Date	Snapshot Variance as of Report Date (+/- 4 highlighted)	SSA I Guidance
Jewish Council for the Aging of Greater Washington	Frederick County	14	11	4	-7	3	-8	Enroll
Jewish Council for the Aging of Greater Washington	Montgomery County	68	54	72	18	58	4	Exit
Baltimore County Department of Aging	Baltimore County	75	66	76	10	59	-7	Continue to enroll/exit as needed
Prince George's County Department of Family Services	Prince George's County	59	47	63	16	45	-2	Continue to enroll/exit as needed
Family and Children `s Services of	Baltimore City	68	60	87	27	68	8	Exit

Central Maryland								
Family and Children `s Services of Central Maryland	Carroll County	14	12	4	-8	2	-10	Enroll
Family and Children `s Services of Central Maryland	Howard County	17	15	5	-10	4	-11	Enroll
MAC, Inc.	Wicomico County	14	12	29	17	19	7	Exit
MAC, Inc.	Worcester County	9	8	1	-7	1	-7	Enroll
Catholic Charities of the Archdiocese of Baltimore	Baltimore City	42	37	72	35	50	13	Exit
Catholic Charities of the Archdiocese of Baltimore	Baltimore County	19	17	5	-12	4	-13	Enroll

Source: Senior Service America, Inc.

(4) The state's long-term strategy for achieving an equitable distribution of SCSEP positions within the state that:

- (A) Moves positions from over-served to underserved locations within the state in compliance with 20 CFR 641.365.
- (B) Equitably serves rural and urban areas.
- (C) Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)

### **The states Long-term Strategy for Achieving an Equitable Distribution of MD SCSEP Positions within the state**

Based on the PY2015 Quarter two Equitable Distribution Report (EDR) (see Table 3.2 on page 40), three counties are under-enrolled by a variance of two-to-five slots and one county is over enrolled by a variance by seven slots.

Many of the variances based on over enrollment are a result of MD SCSEP striving to reach the 175 percent service level performance goal; however, variances based on under enrollments are monitored regularly. To monitor and correct inequities on an ongoing basis, MD SCSEP will implement the following strategies:

1. Prepare and review EDR quarterly and discuss variances with employment specialists and the senior service liaisons during monthly conference call and/or one-on-one conference calls as needed.
2. Review EDR semi-annually with SSAI, the national grantee, and develop strategies needed to achieve equitable distribution.

Monitor local equity distribution status using a variance measurement of +/- 50 percent. SCSEP local staff will be informed of their current status and provided technical assistance to ensure that they serve the appropriate number of authorized positions per county by the end of each PY.

- (5) The ratio of eligible individuals in each service area to the total eligible population in the state. (20 CFR 641.325(a))

### **Ratio of Eligible Individuals in Each Service Area to Total Eligible Population in the state**

*The estimated population for the State of Maryland in 2014 was 5,976,407.*

**Table 3.4 – Limited Maryland Population and Poverty Chart, by county**

County	Total Estimate County Population (2014- 5 year Population Estimate )	Total Estimate e 65 years and older, less than 125 percent of poverty	Total Estimat e 65 years and older	Total Estimate Female 65 years and older	Total Estima te 55 to 59 years	Total Estimat e 60-64 years	Total Estimat e 65-74 years	Total Estimate 75-84 years	Total Estimate 85 and over Years

		level							
Allegany	73,976	16.1 percent	5,813	7,865	4,995	4,544	7,199	4,584	1,895
Calvert	89,793	No data	4,871	5,841	6,303	5,340	6,363	2,996	1,353
Caroline	32,759	No data	2,095	2,626	2,312	1,881	2,688	1,540	493
Charles	150,960	10.9 percent	6,769	2,722	9,489	7,641	9,516	4,282	1,693
Garrett	29,945	No data	2,566	3,060	2,450	1,938	3,242	1,756	628
Kent	20,016	No data	2,033	2,541	1,429	1,497	2,438	1,377	759
Queen Anne's	48,439	No data	3,698	4,180	3,593	3,165	4,848	2,133	897
St. Mary's	108,472	8.6 percent	5,675	6,343	6,994	5,244	7,232	3,371	1,415
Talbot	37,894	No data	4,319	5,226	2,850	2,850	5,206	3,058	1,281
Washington	148,913	12.7 percent	9,635	12,655	9,785	8,864	11,938	7,220	3,132
Baltimore City	622,271	25.3 percent	29,252	44,899	38,913	34,228	40,720	23,926	9,505

Source: 2010-2014 American Community Survey 5-Year Estimates, U.S. Census Bureau

PY2017 experienced reduction of funding, lost 11 slots. MD SCSEP lost 45 slots for low-income seniors to gain job skills and ultimately unsubsidized employment, and the program continues to struggle to assist the great number of seniors residing in its service area that may be qualified to participate.

Although MD SCSEP is still a critical job skills development partner in each county it serves, the funding cuts have deeply affected low-income older Marylanders who may not be experiencing service priority status, such as being a Veteran, or may not be experiencing multiple barriers to employment, such as facing homeless as well as using English as a second language. Still, recruitment and placement priorities of such participants add a degree of difficulty in finding adequate training partners and support services. These realities demonstrate the need for services provided under MD SCSEP; conversely, they also reflect widening gaps in the only federally-funded employment safety net designed for low income older Marylanders.

- (6) The relative distribution of eligible individuals who:
  - (A) Reside in urban and rural areas within the state
  - (B) Have the greatest economic need
  - (C) Are minorities
  - (D) Are LEP.
  - (E) Have the greatest social need. (20 CFR 641.325(b))

**Table 3.5 – Distribution of Individuals within MD SCSEP Service Area**

<b>Counties</b>	<b>Population Estimates</b>	<b>Urban/Rural</b>	<b>Persons in Poverty</b>	<b>Minorities,%</b>	<b>Language other than English spoken at home (Limited English Proficiency)</b>
Allegany	72,952	Rural	18.5 %	8.2% Black 0.2% American Indian 1.0% Asian 0.1% Native Hawaiian 1.6% Hispanic/Latino	4.7%
Baltimore City	622,793	Urban	24.2%	63.7% Black 0.4% American Indian 2.3% Asian 0.0% Native Hawaiian 4.2% Hispanic/Latino	8.8%
Calvert	90,613	Urban	7.2%	13.2% Black 0.4% American Indian 1.7% Asian 0.1% Native Hawaiian 3.5% Hispanic/Latino	4.3%
Caroline	32,538	Urban	16.0%	14.3% Black 0.8% American Indian 1.0% Asian 0.4% Native Hawaiian	6.2%

Charles	154,747	Urban/Rural	7.2%	43.8% Black 0.8% American Indian 3.3% Asian 0.1% Native Hawaiian 5.3% Hispanic/Latino	7.2%
Garrett	29,679	Rural	12.4%	1.1% Black 0.1% American Indian 0.5% Asian 0.0% Native Hawaiian 1.0% Hispanic/Latino	4.6%
Kent	19,820	Rural	13.8%	15.1% Black 0.3% American Indian 1.0% Asian 0.1% Native Hawaiian 4.3% Hispanic/Latino	5.3%
Queen Anne's	48,804	Rural	7.5%	6.9% Black 0.4% American Indian 1.1% Asian 0.0% Native Hawaiian 3.4% Hispanic/Latino	5.3%
St. Mary's	110,382	Rural	8.6%	14.5% Black 0.4% American Indian 2.8% Asian 0.1% Native Hawaiian	7.0%

				3.8% Hispanic/Latino	
Talbot	37,643	Rural	11.7%	13.2% Black 0.3% American Indian 1.5% Asian 0.2% Native Hawaiian 6.3% Hispanic/Latino	8.0%
Washington	149,573	Urban	13.8%	10.9% Black 0.3% American Indian 1.7% Asian 0.1% Native Hawaiian 4.3% Hispanic/Latino	6.9%

**Source: U.S. Census Bureau 7-2014**

(7) A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))

#### **Avoiding Disruptions to SCSEP Operations**

MD SCSEP has a dual responsibility to USDOL as well as its participants. Therefore, in the event that MD SCSEP has to redistribute positions in accordance with a new Census or other reliable data, the program will seek to comply with equitable distribution while avoiding disruption to current program participants. This may mean pausing enrollments, monitoring exits for cause as well as durational limit, monitoring hours, or changing waiver policies. Any action taken will be done in accordance with SCSEP Policies and Procedures. Participants retain their right to grievances throughout their duration in the program.

#### **(d) SCSEP Operations**

**(1) Administrative:** describe the organizational structure of the project and how subprojects will be managed, including:

The Maryland DLLR, DWDAL currently administer the SCSEP (MD SCSEP) as the designated state grantee in 11 counties as follows:

- Allegany County
- Calvert County
- Caroline County

- Charles County
- Garrett County
- Kent County
- Queen Anne's County
- St. Mary's County
- Talbot County
- Washington County
- Baltimore City

The program will be under the direct supervision of the Director of Office Workforce Development and the Special Program Manager. The SCSEP Program Manager will report directly to the Special Program Manager.

**(A) identification of the key staff, including the primary responsibilities and the amount of time assigned to the SCSEP grant:**

### **Key Staff and Primary Responsibilities**

#### **Deborah Wilburn – Program Manager - 100 percent state Employee**

- Establish an overall goal of unsubsidized employment for the PY and develop a system to transition participants from subsidized to unsubsidized employment before their individual durational limit maximum.
- Prepare and submit grant applications, including program narrative, budget, budget justification and the equitable distribution report.
- Prepare the quarterly narrative reports and the state's four year strategic plan.
- Monitor the grant funds and expenditures to ensure compliance with cost allocations in the regulations. Ensure the 9130 report and close out reports are submitted in a timely manner.

#### **Tamara Snell – Assistant Program Manager/Admin. Specialist - 100 percent state Employee**

- Manage all aspects of the national web-based entry system for SCSEP including process new program enrollments, host agency agreements, host agency transfers, and follow-ups to ensure the collection and reporting of all SCSEP required data according to specified time schedules.
- Ensure employment specialist and participant staff are familiar with the latest instructions for data collection, including ETA administrative issuances (e.g. TEGLS, Data Collection and Data Validation Handbooks).
- Support quality improvement including interpretation and training on SCSEP regulations. Maintain excellent contacts with the USDOL Charter Oak, host agencies, participants and potential participants.

#### **Chapman Richardson, Program Operator/Employment Specialist - 100 percent state Employee**

- Recruit and select eligible individuals with priority service and/or minorities to assure maximum participation in the program.
- Develop and implement an Individual Employment Plan (IEP) for each participant. Update and modify IEP twice per year to reflect the participant progress and new goals.

- Collaborate with workforce investment boards, AJCs, VR providers and disability networks to maximize opportunities for participants to obtain workforce development, education, and supportive services to help participants move into unsubsidized employment.
- Identify and recruit new 501(c)(3) organizations or public agencies as Host Agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
- Orientate and train program participants and host agency supervisors on the program goals, objectives and policies and procedures.

**Chapman Richardson, Program Operator/Employment Specialist - 100 percent state Employee (continued)**

- Recertify the income eligibility of each participant at least once every 12 months.

**Josephine Cabi, Program Operator/Employment Specialist - 100 percent Contractual Employee**

- Recruit and select eligible individuals with priority service and/or minorities to assure maximum participation in the program.
- Develop and implement an Individual Employment Plan (IEP) for each participant. Update and modify IEP twice per year to reflect the participant progress and new goals.
- Collaborate with workforce investment boards, AJCs, VR providers and disability networks to maximize opportunities for participants to obtain workforce development, education, and supportive services to help participants move into unsubsidized employment.
- Identify and recruit new 501(c)(3) organizations or public agencies as Host Agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
- Orientate and train program participants and host agency supervisors on the program goals, objectives and policies and procedures.
- Recertify the income eligibility of each participant at least once every 12 months.

**(1) Vacancy – SCSEP Program Operator/Employment Specialist – 100 percent Contractual Employee (Plan to fill one full time vacancy in Baltimore City)**

- Develop and implement an Individual Employment Plan (IEP) for each participant. Update and modify IEP twice per year to reflect the participant progress and new goals.
- Collaborate with workforce investment boards, AJCs, VR providers and disability networks to maximize opportunities for participants to obtain workforce development, education, and supportive services to help participants move into unsubsidized employment.
- Establish an initial goal of unsubsidized employment for participants and promote and facilitate job placement with host agencies or other organizations.
- Identify and recruit new 501(c)(3) organizations or public agencies as Host Agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
- Orientate and train program participants and host agency supervisors on the program goals, objectives and policies and procedures.
- Plan and participate in job fairs, older worker conferences, training seminars, and other planned older worker events.

- Ensure program standards and goals are maintained through recruitment, placement and follow up and individual durational limit exit.
- Recertify the income eligibility of each participant at least once every 12 months.

(B) Include an organization chart depicting any subgrantees or local affiliates implementing the grant. Include a table with authorized positions for each subgrantee or affiliate, if applicable;

**Table with Local Affiliates, Location and Authorized Positions**

<b>Local Staff</b>	<b>Location</b>	<b>Authorized Positions</b>
Chapman Richardson/Program Operator (17 years experience)	Allegany and Garrett Counties	19
Vacant – Program Operator Karen Lucas/Participant Staff (9 months experience)	Baltimore City,	42
Josephine Cabi – Program Operator (4 months)	Calvert, Charles and St. Mary's Counties	26
Helene Rookard/Participant Staff (1 year and 9 months experience)	Caroline, Kent, Queen Anne's and Talbot Counties	17
Melody Hain/Participant Staff (2 years and 8 months experience)	Washington County	19
<b>Total</b>		<b>123</b>

(C) describe training that will be provided to local staff;

The local affiliates will be trained on how to conduct outreach to local businesses and how to promote the program and the current participants. They will partner with the Business Service Representatives in their respective counties and identify participants in the program who have mastered all the training and ready to become gainfully employed with local employers. The local affiliates will be provided case management training to better learn how to keep case notes on the participants and

(D) describe how projects will be monitored for program and financial compliance, including audit plans; and

DLLR's Monitoring and Compliance team will conduct an internal audit and monitor for program and financial compliance. The monitoring team will use an AJC questionnaire that will ask the local affiliates questions about the SCSEP services. The questionnaire will include the following questions:

1. What type of SCSEP information is provided to new applicants at the AJCs or satellite locations (e.g. SCSEP applicant profile form, SCSEP fact sheet and/or TABE testing information)?
2. During the eligibility determination process, did the applicants complete a basic education test (e.g. TABE) and obtain their reading and math grade level? \_\_\_\_\_ Yes \_\_\_\_\_ No
3. After 90 days of enrollment in the program, does the Participant Trainees register on the MWE and complete a minimum of two job searches a month? \_\_\_\_\_ Yes \_\_\_\_\_ No
4. After 90 days of enrollment in the program, have the Participant Trainees completed Individual Employment Plans (IEP) in the MWE?
5. How and when are the IEPs updated?
6. Are former Participant Trainees who have exited the program being followed up? \_\_\_\_\_ Yes \_\_\_\_\_ No
7. What kind of information is being gathered during the follow up activities?
8. Was the performance measures for entered employment and employment retention achieved in the county or counties in the last two PYs? \_\_\_\_\_ Yes \_\_\_\_\_ No

In addition, the monitoring and compliance team will review local affiliates' program files and perform a data validation. The team will receive a data validation sample list and check the files against the information in the SCSEP web based system.

(E) describe how the state will manage its providers and how it will transfer participants if new providers are selected to serve in the state.

The local affiliates will manage the host agencies which are the training providers by conducting periodic monitoring visits with the participant and the host agency supervisors. MD SCSEP will closely monitor and transfer participants to new training assignments within a year. When new training providers enter a host agency agreement with the state, participants approaching their one year anniversary and whose job interests match the training assignment, will be transferred to new training providers.

(2) *Recruitment:* describe how grantee will recruit and select of participants will be achieved. The eligibility of participants is described under 20 CFR 641.500 and 641.525.

Local affiliates will recruit potential participants through walk-ins to the local AJCs, senior centers, and referrals from participants, current host agencies, Senior Service America, Inc, the Maryland National Grantees and other WIOA partners. DLLR, the Maryland State grantee will recruit and select participants based on eligibility. For participant enrollment, older mature adults must be residents of Maryland, 55 years or older, unemployed, with a family income of 125 percent or less of the poverty level (after allowable exclusions), as established by the U.S. Department of Health and Human Services. Enrollment priority is given to the individuals with the following employment barriers:

- Is a Veteran or a qualified spouse of a veteran
- Is 65 years of age or older

- Has a disability
- Has LEP
- Has low literacy skills
- Resides in a rural area
- Is homeless or at risk of homelessness
- Has low employment prospects
- Has failed to find employment after utilizing services provided under Title I of WIOA

All candidates who meet the age, income and possess a minimum of two or more employment barriers will be selected to enroll in the program.

**(3) Income Eligibility:** describe how participant income will be recertified each year, including where eligibility records will be maintained.

Income eligibility of every participant, even participants on an approved break will be reviewed prior to June 30<sup>th</sup> of each year by the local affiliate (Employment Specialist) or SCSEP staff. If, at any time, the Employment Specialist or SCSEP staff suspects that a participant may be over the federal poverty level, the participant may be asked to provide information for the necessary documentation.

If a participant is determined to be over-income on the recertification date or at any other point during SCSEP participation, they will be provided a thirty (30) day written notice of termination. The participant can continue to train until their exit date. The local SCSEP staff will refer the participant to a DLLR job service specialist for assistance.

All eligibility records will be maintained at the local program office.

**(4) Orientation:** describe the orientation procedures for:

**(A) Participants**

New participants will be provided orientation and the essential information required to effectively fulfill their training assignments.

Group or one on one orientation sessions will include, but not be limited to, information:

- a) SCSEP project goals and objectives.
- b) Participant rights and responsibilities; participant handbook.
- c) Training site information, including the following:
  1. Name of the agency;
  2. The agency's address and directions to the location, if needed;
  3. The training site supervisor's name;
  4. A training plan with duties listed; and
  5. A training schedule (including hours and days).
- d) Administrative procedures (including instructions on how to enter and submit a time sheet in Workday). Policies on training hours, wages, and fringe benefits.
- e) Policies on leave and calling in sick.
- f) The Individual Employment Plan (IEP).
- g) Training opportunities available through the project.
- h) Service plans in the IEP to assist in the participant's transition to unsubsidized employment.

- i) Available supportive services.
- j) Permitted and prohibited political activities.
- k) Safe working habits and conditions.
- l) Procedures for reporting accidents and handling emergencies.
- m) The Age Discrimination in Employment Act (ADEA).
- n) The Americans with Disabilities Act of 1990.
- o) The Drug-Free Workplace Act of 1988.
- p) Grievance procedures.

#### **(B) Host Agencies**

The local affiliates will meet with the new host agency and provide a copy of the host agency handbook on the program. They will provide training on how to assist the participant with completing their time sheet in Workday. They will also provide  
antee to the training site supervisor and any other staff involved with SCSEP participants. The form(s) should be placed in the Host Agency file.

***(5) Duration Limits:* describe any policy for maximum duration of enrollment or maximum time in community service and provide a copy of the current Duration Limit policy.**

MD SCSEP has a maximum duration of enrollment of 48 months without the possibility of extension. This means that no participant can remain in the program beyond the 48-months time limit for participation.

***(6) Assessments:* describe the procedures for assessing job aptitudes, job readiness, and job preferences of participants and their potential to transition into unsubsidized employment. Also describe how the assessment will be used to develop the participant's Individual Employment Plan (IEP).**

After participants have been determined eligible to participate in SCSEP, they will:

- Be interviewed to determine job aptitudes, job readiness and job preferences, current skills and past work and volunteer experience
- Complete a self-assessment of current interests, experiences and abilities
- Complete an independent, computer-based assessment of trainability (i.e., the Test of Adult Basic Education or TABE)

Based on this information they will be matched to a community service assignment at a host agency. Within the first 30 days of training, the local affiliate will meet with the participant to develop an Individual Employment Plan (IEP). Together the participant, the Employment Specialist and/or the Senior Service Liaison will establish goals such as training needed for viable unsubsidized employment and supportive services to address barriers that may get in the way of obtaining IEP goals. The SCSEP staff will conduct periodic assessments and enter the case notes in the MWE Website.

Referrals will be made to Title I for eligible participants for additional assessment and training as needed.

***(7) Community Service Assignments:* describe how the participant will be assigned to community service including:**

**(A) the types of community service activity that will be emphasized and how they were chosen; methods used to match participants with community service training;**

The participant will be assigned to a community service assignment based on their job interests and job preferences. The community service assignments are mostly office and administrative support, food preparation and service and community and social services. MD SCSEP plans to seek more meaningful community service activities in other state agencies for example the Maryland Department of Vehicle Administration because this department can likely provide community service assignments as customer service representatives, driving instructors, test administrators, etc.

**(B) the extent to which participants will be placed in the administration of the project itself;**

Currently, MD SCSEP three participant staff training as office support and as case workers. MD SCSEP is in the process of interviewing and selecting another participant staff to assist the SCSEP administrative office. Interviews are scheduled at the beginning of the year.

**(C) the types of host agencies used and the procedures and criteria for selecting the assignments;**

The current host agencies include churches, libraries, schools and senior centers, non-profit organizations and government agencies. The community service assignments must be relevant and meaningful assignments that will provide legitimate new job skills that can be applied to a new job.

**(D) the average number of hours in a participant's training week;**

Participants train an average of 20 hours a week to a maximum of 40 hours within a pay period.

**(E) the fringe benefits offered (if any); and**

Fringe benefits that are offered to participants employed under the program include:

- All fringe benefits required by law and by federal regulations, e.g. FICA;
- Physical examinations; and
- Workers' compensation coverage.

A physical exam is offered to each participant annually. The examining physician shall provide, to the participant only, a written report of the results of the assessment. A participant may refuse the physical exam. The participant must sign the participant waive refusal form. MD SCSEP will provide workers' compensation coverage for participants.

**(F) procedures for ensuring adequate supervision.**

To ensure adequate supervision, all host agencies are required to sign a host agency agreement and assigned a host agency supervisor to oversee the participant(s) and the community service assignments. The local affiliates will conduct periodic onsite monitoring visits to the host agencies.

**(8) Training: describe the training that will be provided during community service assignments and any other types of training provided, including linkages with local AJC centers, and RA.**

Specific steps will be taken to integrate the training program into DLLR's AJCs (AJCs) and DLLR's workforce development system and programs including the Apprenticeship.

(9) *Supportive Services*: describe the supportive services that will be offered to help participants obtain and retain an unsubsidized job, including transportation assistance (if applicable).

Participants will have several supportive services available. The types of supportive services include but are not limited to:

- Training,
- Job search assistance (creating resume, mock interview skills and online job applications)
- Incidentals such as uniforms, safety glasses
- Counseling and referrals (housing and transportation assistance);

If a participant needs transportation assistance the Employment Specialist or Senior Service Liaison will contact the transportation authority to inquire about travel vouchers, mobility transportation or other options.

(10) *Termination*: describe procedures for terminating a participant, including Individual Employment Plan(IEP) terminations. Please provide a copy of the current termination procedures.

## **B. TERMINATION PROCESS AND POLICY**

The DLLR will provide all participants a written copy of the Participant Trainee Handbook that includes the *Termination Policy* and will verbally review this policy with each participant at the time of enrollment. The Termination Policy will be followed fairly and equitably in terminating any participant. There is no upper age limit for participating in SCSEP and participants cannot be terminated due to age. All terminations require a 30-day written notice. All terminations are subject to the DLLR *Grievance Policy* and participants will be informed of their right to appeal.

### **DISCIPLINARY/TERMINATION PROCEDURES**

The termination procedure will typically include the following disciplinary steps:

#### Step One: Documented Written Warning

The SCSEP staff will warn a participant and follow up with written documentation of the warning. The SCSEP staff will discuss with them via telephone or in person. The participant will be informed of the corrective action needed and the time frame for which the corrective action must be taken. A copy of the written warning will be sent to the participant and placed in their personnel file.

#### Step Two: Termination

Participants may not be terminated until 30 calendar days after they have been provided a written notice. Written notices of termination, including the reason for the action and appeal procedures must be given to the participant if he/she is expected to be terminated from SCSEP. Participants have the right to appeal any decision.

The SCSEP staff may skip Steps One and go straight to Step Two (outlined above) and terminate a participant immediately for serious violations such as fraud, theft, destruction of property, violence, or threats to health and safety of the participant or others.

## **TERMINATIONS FROM SCSEP**

At time of enrollment, DLLR provides each participant with a written copy of its Participant Trainee Handbook. Each participant is also notified verbally of the termination policies held therein. This handbook contains policies for terminating a participant for cause or otherwise, as described in 20 CFR 641.580(g).

Participants may be terminated from the program by statute, for cause, or Individual Employment Plan, over income related reasons and for failure to accept a reasonable number of job offers or referrals to unsubsidized employment consistent with their Individual Employment Plan (IEP). The specific conditions for termination under one of these categories are as follows:

### **BY STATUTE** reasons for termination include:

- Fraud
  - Examples of fraudulent actions include knowingly providing false information to qualify for SCSEP or maintaining other employment while also participating in the SCSEP program.
- Staff incorrectly determined participant to be eligible at enrollment or recertification.
- Participant is deemed ineligible during recertification.
- Participant reaches individual durational limit.
- Participant becomes employed while enrolled in SCSEP.
  - To qualify for enrollment in SCSEP, a participant has to be unemployed; all participants are informed that they may not be employed while participating in the program and that they must notify the program representative immediately upon becoming employed. A participant who is discovered to be employed while enrolled without having notified the program of the employment will be terminated from the program. The participant will be placed immediately on “Leave without Pay” and a 30 day notification of termination will be issued in writing to the participant.

### **FOR CAUSE** reasons for termination include:

- Refusal to cooperate in establishing eligibility.
- Unwillingness to perform training assignment duties.
- Refusal to accept a transfer to a different training assignment supported by the participant's IEP.
- Frequent tardiness or unauthorized absences as documented by records.
  - Participants must follow the attendance and tardiness policy of their host agency.
  - Falsification of timesheets or official documents by the SCSEP participant.
- Insubordination:
  - Refusal to accept or complete tasks as assigned by host agency supervisor.
  - Refusal to follow verbal or written instructions as given by program staff or authorized host agency staff.

- Obscene/abusive language or behavior.
- Non-compliance with Substance Abuse Policy, which states:
  - The DLLR absolutely prohibits the use, consumption, sale, purchase, transfer, or possession of any illegal prescription drug or non-prescription drug by any SCSEP participant during working hours while enrolled in SCSEP. In addition, SCSEP participants are strictly prohibited from being under the influence of alcohol during working hours, while enrolled in SCSEP.
- Failure to cooperate with Program and/or Host agency staff.
  - Failure to attend SCSEP sponsored meetings with program staff
  - Failure to attend any required training in support of the overall training assignment (i.e., not attending food safety classes as a kitchen aide)
  - Failure to complete paperwork or communicate break status before commencing
  - Failure to follow policies and procedures of host agency without good cause.

**FOR INDIVIDUAL EMPLOYMENT PLAN (IEP)** related reasons for termination may include, but are not limited to:

- Failure to participate in the process as outlined in the IEP document.
- Repeated refusal by the SCSEP participant to perform specific actions, without good cause:
  - Attending a job interview;
  - Accepting an initial or alternative assignment;
  - Registering at the local AJC;
  - Improving personal habits or appearance as required by the standards of the specific host agency or in the commission of specific tasks outlined in the training plan;
  - Participating in workshops, training, etc.

For Cause violations and IEP-related violations must be documented in writing. Each documented violation must be discussed in a meeting with the SCSEP participant, the host agency supervisor and/or the Employment Specialist.

*Termination for Individual Employment Plan Violation* – Failure to participate in the IEP process may be cause for corrective actions and, as a last resort, termination. Prior to an IEP related termination, the participant will be given a chance to correct the offending action. Written notice shall be given to the participant, citing a specific incident in which they did not fulfill their responsibility. The notice should list the specific event, cite the jointly signed agreement provision and provide a period of time for corrective action.

**FOR OVER INCOME** reasons for termination include: If at any time, SCSEP program staff determine that a participant is no longer eligible for continued enrollment because he/she has attained additional includable income during the preceding six or 12 months or because of a change in family status, that participant must be terminated with a 30 day notification. Determinations of ineligibility cannot be based on anticipated changes in income or family size; they must be based on actual data. Participants have the responsibility to report increases in income and changes in family status. Participants are allowed to continue training at their

Community Service Assignment until their date of exit.

**FOR VIOLATION OF LEAVE OF ABSENCE** reason for termination include: Participants may be terminated if they reach the time limit established with the DLLR or if they do not comply with the DLLR approved policy as outlined in the Participant Handbook.

**FOR REACHING DURATIONAL LIMIT** reason for termination include: The maximum eligibility period for SCSEP participation for people enrolled on or after July 1, 2007, is a total of 48 months. Participants who reach their durational limit must be terminated on or before the date when they reach their four year limit. Participants are allowed to continue training at their community service assignment until their date of exit but not encouraged to do so.

**FOR PROGRAM INELIGIBILITY** reason for termination include: If the DLLR determines that a participant is no longer eligible during the eligibility verification process, DLLR must give written notice explaining the reasons for termination and applicable procedures to appeal. If the DLLR discovers (after the eligibility or recertification process is finished) that staff incorrectly determined the participant to be eligible through no fault of their own; DLLR must give written notice. Participants are allowed to continue training at their community service assignment until their date of exit.

**FOR BECOMING EMPLOYED WHILE ENROLLED IN SCSEP** reason for termination include: To remain qualified for enrollment in SCSEP, a participant has to be unemployed. If, at any time, the DLLR staff determines that a participant acquired an unsubsidized job while enrolled on SCSEP, that participant will be placed on “Leave Without Pay” for 30 calendar days and will be given an immediate written 30 calendar notice letter explaining the reason for termination and the appeal procedure.

**FOR FAILURE TO ACCEPT A REASONABLE NUMBER OF JOB OFFERS OR REFERRALS TO UNSUBSIDIZED EMPLOYMENT CONSISTENT WITH THE INDIVIDUAL EMPLOYMENT PLAN** reasons for termination include: If at any time, the DLLR staff determines that a participant has fail to accept reasonable number of job offers or referrals to unsubsidized employment, that participant will be placed on “Leave Without Pay” for 30 calendar days and will be given an immediate written 30 calendar notice letter explaining the reason for termination and the appeal procedure.

(11) *Complaints and Grievances:* describe the procedures for addressing and resolving participant complaints and grievances related to program termination. Please provide a copy of the current complaint/grievance policies.

### **GRIEVANCE/COMPLAINT POLICY AND PROCEDURE**

DLLR grievance/complaint policy and procedure are conveyed to the participants and the host agency supervisors through the Participant Trainee Handbook and the Host Agency Handbook and to potential applicants upon request.

Written notices of termination including the reason for the action and appeal procedures must be given to participants who SCSEP program staff expect to terminate. Participants have the right to appeal any termination decision. Participants may not be terminated until 30 calendar days

after they have been provided a written notice. The DLLR will ensure that the grievance procedure will be provided uniformly and fairly.

A participant must file a grievance within 15 days of the alleged incident to the SCSEP Program Manager, triggering the following grievance policy and procedure. All written appeals should *first* be submitted to the following:

Ms. Deborah Wilburn, SCSEP Program Manager  
DLLR  
1100 North Eutaw Street, Room 201  
Baltimore, MD 21201  
(410) 333-5162 Fax

Upon receipt of a written complaint or appeal of Termination, the Program Manager and/or the SCSEP staff, the participant who filed the complaint, and the host agency supervisor, if appropriate, should seek to resolve the differences in an informal conference, which should be held within 15 business days. The receipt of the written complaint/appeal will be documented by the Program Manager and/or SCSEP staff. A written statement concerning the result of the decisions made at the conference should be provided to all involved persons within the following five days.

If the participant who filed the complaint is not satisfied with the results of the informal conference, the participant shall have the right to further appeal, in writing, to the Secretary of the DLLR or a designee. This level of appeal should be submitted to:

Mr. Carl Reavis  
Special Programs Manager  
DLLR  
1100 North Eutaw Street, Room 201  
Baltimore, MD 21201  
(410) 333-5162 Fax

The appeal shall be heard within 15 business days upon receipt. The participant shall have the opportunity to confer regarding the affected policies, the right to use the assistance of other persons at the hearing, to call witnesses, and to question the persons involved in the complaint. A written summary of the results of the appeal and all related decisions made as a result of the hearing shall be provided to all persons involved within five business days. The Program Manager will keep all rendered decisions on file within the main SCSEP office for a period not less than three years.

1. All SCSEP staff are provided training and direction to effectively accept, investigate, and respond to appeals submitted by participants of the SCSEP.
2. The complaint resolution procedure of the DLLR's SCSEP shall be completed within 45 days of the filing of a complaint, unless there are mutually agreed upon delays, which shall be documented. The 45 day period shall include time for the filing of an appeal to the Secretary or designee of DLLR's SCSEP.

3. The DLLR's response is considered final unless the complainant (participant) alleges that the grievance policies and procedures found herein were not followed OR there is a further allegation of a violation of federal law (other than civil rights laws) that has been unresolved for the previous 60 days.
  - a. If the complainant alleges the factors in #2, an appeal must be filed with the USDOL, Employment and Training Administration.

Allegations of violations of federal law, which are not resolved within 60 days under the DLLR's procedures, may be filed with the Chief, Division of Adult Services, Employment and Training Administration, USDOL, 200 Constitution Avenue, NW., Washington, DC 20210. Allegations determined to be substantial and credible will be investigated and addressed.

NOTE: If the complaint alleges discrimination in violation of civil rights laws, the complaint must be filed with the Civil Rights Center at the US USDOL:

Office of External Enforcement  
Civil Rights Center  
US USDOL  
Room N-4123  
200 Constitution Avenue, NW  
Washington, DC 20210

(12) *Maximizing enrollment:* describe procedures for fully enrolling all available slots, including over enrolling participants, and how over-enrollments will be balanced with equitable distribution requirements.

MD SCSEP will closely monitor the equitable distribution in each of the eleven counties. To fully enroll all available slots, the equitable distribution report is shared and discussed with the Labor Exchange Administrators, Employment Specialists, Lead Senior Service Liaison and the Senior Service Liaisons.

MD SCSEP will seek best practices for improving equitable distribution from counterparts including Senior Service America, Inc. and the District of Columbia, Department of Employment Services (DOES) Division of state Initiatives (DSI).

Over enrollments will be balanced with equitable distribution requirements by focusing on exiting the SCSEP participants into unsubsidized jobs. Currently only one of the eleven counties is over enrolled.

(13) *Performance:* include a proposed level for each performance measure for each of the PYs covered by the plan. While the plan is under review, the state will negotiate with the Employment and Training Administration to set the appropriate levels for the next year. The state may also negotiate performance levels in a subsequent modification. At a minimum, states must identify the performance indicators required under the SCSEP Final Rule published on September 1, 2010, and, for each indicator, the state must develop an objective and quantifiable performance goal for the next year. The performance measures include:

- (A) entered employment,
- (B) employment retention,
- (C) average earnings,
- (D) service level,
- (E) service to most-in-need, and
- (F) community service

(14) *Administrative Costs:* describe any request for an increase in administrative costs consistent with section 502(c)(3) of the Older Americans Act.

## **SCSEP ASSURANCES**

1. The State Plan must include assurances that: Where SCSEP is included in the Combined Workforce Plan, the state established a written policy and procedure to obtain advice and recommendations on the State Plan from representatives of the state and area agencies on aging; state and local boards under WIOA; public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the state, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Social service organizations providing services to older individuals; Grantees under Title III of OAA, Affected Communities, Unemployed older individuals, Community-based organizations serving older individuals; business organizations; and labor organizations.

## VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

**COMMUNITY SERVICES BLOCK GRANT** Note: Below is information about the employment and training activities carried out under the Community Services Block Grant (CSBG) (42 U.S.C. 9901 et seq.) that is included in the WIOA Combined State Plan. The complete CSBG State Plan is submitted directly to the Federal agency that administers that program and is collected under OMB Control Number: 0970-0382. Where CSBG is included in the Combined State Plan, the State CSBG Lead Agency (as designated by the chief executive of the State under the requirements of section 676(a) of the CSBG Act (42 U.S.C. 9908(a)) will coordinate plans for employment and training activities under CSBG as part of a larger antipoverty and workforce development strategy.

As part of the Combined State Plan, the State CSBG Lead Agency must: (a) Describe how the State and the eligible entities will coordinate the provision of employment and training activities through Statewide and local WIOA workforce development systems; and may (b) Provide examples of innovative employment and training programs and activities conducted by eligible entities or other neighborhood-based organizations as part of a community antipoverty strategy.

As of January 2018, conversations are ongoing regarding the inclusion of the Community Services Block Grant into the Maryland WIOA Combined State Plan.

## VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

### **REINTEGRATION OF EX-OFFENDERS PROGRAM (RExO)**

*Note: Please note that the USDOL has updated the name of the RExO program. This program is now the Re-entry Employment Opportunities Program (REO).*

There are no program-specific state planning requirements for RExO. If the state includes RExO in a Combined State Plan, the state must incorporate RExO in its responses to the common planning elements in sections II, III, IV, and V WIOA State Plan requirements instrument.

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- <sup>i</sup> Bureau of Economic Analysis. (2017). National Data.
- <sup>ii</sup> Bureau of Economic Analysis. (2017). Regional Data.
- <sup>iii</sup> Ibid.
- <sup>iv</sup> Ibid.
- <sup>v</sup> Ibid.
- <sup>vi</sup> Ibid.
- <sup>vii</sup> Bureau of Economic Analysis; Bear Facts; Personal Income for Maryland, 2017
- <sup>viii</sup> BLS; Current Employment Statistics, Not Seasonally Adjusted, 2017
- <sup>ix</sup> International Trade Administration. (2014). *Exports, Jobs, and Foreign Investment*. Retrieved from International
- <sup>x</sup> Ibid.
- <sup>xi</sup> Ibid.
- <sup>xii</sup> BLS; Current Employment Statistics, Not Seasonally Adjusted, 2017
- <sup>xiii</sup> Ibid.
- <sup>xiv</sup> Ibid.
- <sup>xv</sup> Ibid.
- <sup>xvi</sup> Ibid.
- <sup>xvii</sup> Ibid.
- <sup>xviii</sup> Ibid.
- <sup>xix</sup> Ibid.
- <sup>xx</sup> Ibid.
- <sup>xxi</sup> Ibid.
- <sup>xxii</sup> Ibid.
- <sup>xxiii</sup> DLLR; Occupational Employment Statistics, 2017
- <sup>xxiv</sup> Ibid.
- <sup>xxv</sup> Senior Service America, Inc. is the Maryland national SCSEP grantee with subgrantees Jewish Council for the Aging of Greater Washington; MAC, Inc.; Baltimore County Department of Aging; and Prince George's County Department of Family Services, Aging Services Division. The DLLR is the Maryland State SCSEP grantee, which serves the Allegany, Baltimore City, Calvert, Caroline, Charles, Garrett, Kent, Queen Anne's, St. Mary's, Talbot, and Washington counties. Senior Service America, Inc. operates in the remaining 13 counties. In Baltimore City, both Senior Service America, Inc. and the DLLR administer the SCSEP program concurrently.
- <sup>xxvi</sup> The press release outlining the projects can be accessed here: <http://www.dllr.maryland.gov/whatsnews/appinnovation.shtml>
- <sup>xxvii</sup> Maryland's Basic Education Skills and English Language Assessments policy is accessible at [www.dllr.state.md.us/employment/mpi/mpi5-16.pdf](http://www.dllr.state.md.us/employment/mpi/mpi5-16.pdf)
- <sup>xxviii</sup> Maryland's Basic Education Skills and English Language Assessments policy is accessible at [www.dllr.state.md.us/employment/mpi/mpi5-16.pdf](http://www.dllr.state.md.us/employment/mpi/mpi5-16.pdf)
- <sup>xxix</sup> WIOA Title I Training & Maryland's Eligible Training Provider List is accessible at [www.dllr.state.md.us/employment/mpi/mpi9-17.pdf](http://www.dllr.state.md.us/employment/mpi/mpi9-17.pdf)
- <sup>xxx</sup> Senior Service America, Inc. is the Maryland national SCSEP grantee with subgrantees Jewish Council for the Aging of Greater Washington; MAC, Inc.; Baltimore County Department of Aging; and Prince George's County Department of Family Services, Aging Services Division. The DLLR is the Maryland State SCSEP grantee, which serves the Allegany, Baltimore City, Calvert, Caroline, Charles, Garrett, Kent, Queen Anne's, St. Mary's, Talbot, and Washington counties. Senior Service America, Inc. operates in the remaining 13 counties. In Baltimore City, both Senior Service America, Inc. and the DLLR administer the SCSEP program concurrently.
- <sup>xxxi</sup> Information on the Jobs for Veterans Act of 2002 is available at [www.doleata.gov/programs/VETS](http://www.doleata.gov/programs/VETS).
- <sup>xxxii</sup> Information on the Veterans' Benefits, Healthcare, and Information Technology Act of 2006 is available at [www.congress.gov/bill/109th-congress/senate-bill/3421](http://www.congress.gov/bill/109th-congress/senate-bill/3421)
- <sup>xxxiii</sup> 38 U.S. Code § 4215 - Priority of service for veterans in Department of Labor job training programs - <https://www.gpo.gov/fdsys/pkg/USCODE-2008-title38/pdf/USCODE-2008-title38-partIII-chap42-sec4215.pdf>; A Protocol for Implementing Priority of Service For Veterans and Eligible Spouses: <https://wdr.doleata.gov/directives/attach/TEN/ten2010/ten15-10a1.pdf>
- <sup>xxxiv</sup> Veterans Program Letter 03-14 - <https://www.dol.gov/vets/VMS/VPLs/VPL-03-14.pdf>
- <sup>xxxv</sup> <http://ad-astrainc.com/services/interpretation/>. October 2017.
- <sup>xxxvi</sup> Report can be found here: <http://www.newamericanconomy.org/wp-content/uploads/2017/02/nae-md-report.pdf>
- <sup>xxxvii</sup> Including the possibility of Trade impact.
- <sup>xxxviii</sup> Defined as ages 55+ in accordance with WIOA Section 3(39).
- <sup>xxxix</sup> For comparison, state and federal RA programs require 2,000 hours of on-the-job learning and 144 hours of classroom instruction per year.
- <sup>xl</sup> <http://msa.maryland.gov/msa/mdmanual/01glance/html/agri.html>
- <sup>xli</sup> [https://www.nass.usda.gov/Quick\\_Stats/Ag\\_Overview/stateOverview.php?state=MARYLAND](https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=MARYLAND)
- <sup>xlii</sup> [https://www.nass.usda.gov/Statistics\\_by\\_State/Maryland/Publications/Annual\\_Statistical\\_Bulletin/2016/2016-2017%20MD%20Annual%20Bulletin.pdf](https://www.nass.usda.gov/Statistics_by_State/Maryland/Publications/Annual_Statistical_Bulletin/2016/2016-2017%20MD%20Annual%20Bulletin.pdf)