

**HEARTLAND WORKFORCE SOLUTIONS BOARD**

**SERVING THE GREATER OMAHA WORKFORCE DEVELOPMENT AREA IN NEBRASKA**

**July 1, 2015 to June 30, 2017**

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**EXECUTIVE SUMMARY**

* 1. **Introductory Overview**

*(Each local plan should begin by providing a brief introduction of the local workforce investment area highlighting the geographical workforce investment area, population, diversity of the population, area strengths, and opportunities for improvement. It would be appropriate to address how the local workforce investment system has improved and changed since the enactment of the Workforce Investment Act of 1998 and the expectations for further transformation anticipated in the next few years.)*

Heartland Workforce Solutions (HWS) Board serves the Greater Omaha Workforce Development Area of Douglas, Washington and Sarpy counties. This document is the local plan for the three-county area for the Workforce Innovation and Opportunity Act (WIOA) Program Year 2015-2016 (July 1, 2015 – June 30, 2016. Its purpose is to provide a roadmap for future focus and to inspire creative and innovative actions by HWS, Inc., its Workforce Development Board and staff during the transition year for WIOA. It is intended to result in clear, measurable outcomes that will provide value to the many customers and beneficiaries of the Workforce Investment System.

The strategic focus in this plan considers the great needs in our community and ways to wisely invest WIOA resources to impact unacceptable levels of poverty, underemployment and unemployment, low educational attainment and high secondary school dropout rates. The board will implement a dual customer approach in developing a truly demand-driven system that utilizes workforce development as a partner in economic and community development efforts.

**Population**

The Greater Omaha population base continues to steadily increase and reflects the highest growth rate of the three Workforce Development Areas. In 2012, the three-county Local Area’s population of 717,390 represented 38.5% percent of the state’s population. Sarpy County (population 166,881) represents the fastest growing county in the state with a 4.4% increase in population with Douglas County (population 529,915) growing at a rate of 2.7%. Washington County (population 20,594) grew 0.1% from 2010 to 2012.

**Diversity of Population**

The Omaha metropolitan statistical area (MSA) also features great diversity within its population. The American Community Survey (2010-2012, 3-year average) reports a total population of 876,971 for the Omaha MSA. African-Americans represent 7.7% of the population; American Indian and Alaska Natives represent 0.6% of the population; Asians represent 2.1% of the population and Native Hawaiian and Other Pacific Islanders represent 0.1% of the population. Persons reporting two or more races account for 2.5% of the population. Persons reporting Hispanic or Latino ethnicity account for 9.2% of the population.

An analysis of the workforce issues faced by HWS requires a closer look at the dynamics of the population served. The diversity of the Greater Omaha area means that solving issues of unemployment and underemployment will necessitate a nimble and flexible approach to the varied conditions created by that diversity. The Omaha metropolitan area faces significant workforce challenges including but not limited to, low literacy rates, higher secondary school dropout rates, widespread and multi-generational poverty, and a higher number of ex-offenders than anywhere in the state. While the three-county area doesn’t have a monopoly on any of these community issues, they exist at rates that exceed those of any other geographic area of Nebraska. As such, this population requires different strategies to address the numerous and significant obstacles encountered by its job seekers.

The economic gap between persons of color and whites remains. Omaha’s urban core, predominately in north and south Omaha, has resulted in a deep divide among the have and have-nots. Compared to the 100 largest metropolitan areas in the U.S., Omaha ranks 5th in economic disparity between Black and White populations in poverty. The city also ranks 14th for poverty rate for black individuals (32% of blacks live in poverty) and sadly, ranks 12th in its poverty rate for black children under age 18 (45% of black children live in poverty). *(U.S. Census Bureau, 2006-2010 American Community Survey)*

**Local Market Trends**

The Metro Area, as defined by the Greater Omaha Economic Development Partnership, encompasses the 8-county Greater Omaha Metropolitan Statistical Area (MSA) of Cass, Douglas, Sarpy, Saunders, and Washington Counties in Nebraska and Harrison, Mills, and Pottawattamie Counties in Iowa.

The Greater Omaha Economic Development Partnership reports in its December report “Greater Omaha Indicators” reported that Omaha ranked 10th on Nerd Wallet’s list of 2013 Best Cities to Start Business. Nerd Wallet examined the biggest cities in the U.S. and covered a variety of measures including how easy it is to get funding, favorable business climate, ease of hiring, and lastly cost of living. *(Source: Nerd Wallet creates user-friendly tools, crunches numbers and provides unfiltered analysis to the public. Nerd Wallet provides data-driven tools and impartial information to help the public make solid decisions about the money, finance, investing, credit cards, cost of living and shopping. Their analysis has appeared in several media outlets, including the following: The New York Times, CNN Money, Reuters, and MSN Money.)*

The Greater Omaha Economic Development Partnership Executive Summary also highlighted the positive business climate in Nebraska, claiming, “Nebraska has fostered a tax structure that is equitable to both businesses and individuals.” Transportation is another Omaha strength outlined in the report created by the air, interstate and railroad resources available in the area. The communications capabilities of the Omaha area also set it apart. According to the Greater Omaha Economic Development Partnership, “…Greater Omaha has developed a thriving information technology sector, attracting companies with skilled, high-tech workforces.” Per the summary, the attractiveness of the Greater Omaha area is furthered by the fact that Nebraska is the only public power state in the nation; the cost of living in the Omaha area is 10 to 12 percent below the national average; and Omaha can provide a high quality of life. Additionally, the Omaha area has 14 colleges and universities to meet the workforce training needs of the region.

The three counties are home to over 18,000 businesses, including five Fortune 500 companies:

• Berkshire Hathaway

• Union Pacific

• ConAgra Foods, Inc.

• Peter Kiewit & Sons, Inc.

• Mutual of Omaha

In addition to large prominent corporations, the region is also home to a vibrant small business sector. This sector represents as much as 80% of Greater Omaha’s Chamber of Commerce members and is critical to the vibrant economic engine in Omaha and across the entire state.

The 2012 Small Business Profile, compiled by the U.S. Small Business Administration’s Office of Advocacy (<http://www.sba.gov/sites/default/files/ne12.pdf>) demonstrates that small businesses are job generators and innovators, and that they represent an array of opportunities to the diverse spectrum of individuals in their communities.

Additional good news for Omaha and the state is Nebraska’s low unemployment rate. In spite of the nation’s recession, Omaha’s rate averaged 4.2% in 2013 (preliminary), while the national unemployment rate for 2013 was 7.4%. For the same time period, Douglas County, at 4.4%, had the highest unemployment rate amongst the three counties in our region; Sarpy County had an unemployment rate of 3.9% and Washington County had an unemployment rate of 3.8%. Even more significant than the unemployment rates for Douglas, Sarpy, and Washington counties are the extreme levels of high unemployment rates within the North Omaha area, where unemployment levels reach double digits (over 10%) and are greater than 20% in particular census tracts. The specific unemployment rates in our service areas require special consideration and strategies. *(Source: According to the American Community Survey (US Census), the 5-year average unemployment rate for the following Census Tracts was above 20%: Tract 8 (27.1%); tract 6 (26.9%); Tract 7 (25.6%); Tract 11 (21.6%); and Tract 59.02 (20.4%). For the same period of time the unemployment rate for Douglas County was 6.8%.)*

**Strengths**

Based on the economic health of the region, the three-county Workforce Development Area enjoys the following strengths:

• A pro-business climate

• An educated, highly productive, cost efficient workforce

• Well-developed transportation

• Sophisticated communications

• Public power

• Low cost of Living

• High quality of Life

• Access to quality educational institutions

Since January, 2010, the Greater Omaha Chamber also considers the founding of Heartland Workforce Solutions, Inc. a positive force toward resolving institutional poverty and impacting Greater Omaha’s economic disparity and gaps in workforce development.

**Local Areas for Improvement**

In addressing the employment needs of special populations, HWS will continue to address the needs of:

* Immigrant populations and English language learners toward employment
* Decreasing barriers to employment for ex-offenders or individuals with criminal backgrounds
* Supporting transition of veterans from active service to employment with assessment for transferrable skill sets from military to civilian life
* Coordination with area community based organizations to support seamless services between training and employment and their delivery of individualized social services.

**Improvements, Change and Expectations**

On July 2, 2010, HWS incorporated as a private nonprofit serving public purposes and received its final IRS 501(c)(3) determination in 2011. This transition has enabled the HWS Board to work strategically in resolving workforce issues in our community and seek private funding beyond WIA dollars to support system reform. The board’s strategic plan provides a roadmap with specific goals and directs investments in the area's workforce system to achieve the outcomes required for system change.

In partnership with the Local CEO (Omaha Mayor's office), HWS began administrative oversight of the local workforce structure effective January 1, 2011. An executive director and program staff was hired and, effective April 1, 2011, HWS assumed administrative and programmatic oversight of the WIOA Adult, Dislocated Worker and Youth programs and the One-Stop operation in Greater Omaha.

The HWS Board contracted with Goodwill Industries on April 1, 2011 with the goal of overhauling the One-Stop Career Center (now called the American Job Center) to one which improves and increases levels of customer service provided and increases levels of collaboration among workforce partners. New processes and operating procedures have been implemented to offer higher quality services and meet the new demands in preparing for the 21st century workforce. The strategies HWS has implemented are data driven and based on best practices from workforce development innovations implemented across the U.S. Strategies recognize that individuals enter the program with different skills, motivation, and barriers to employment. Therefore, the Plan will focus on individual needs of participants and matching resources to fill the gaps of knowledge, experience, and skills that are required to known jobs in the community.

HWS identified three strategies that targeted services may be delivered to both adults and youth for implementation in the 2012-2014 Local Plan. These will continue in the new plan. They include:

* Basic skill development including emphasis on numeracy and literacy;
* Employability (soft) skill training; and
* Career Pathway support of youth, adult and dislocated workers as individuals pursue education, retooling and career development strategies.

These three pillars of employment success have been documented as local area priorities through interviews of employers and job-seekers alike. A summary of both mission based and operational goals are attached. (CC)

Working directly with an employer to evaluate employment opportunities, and then support their interviews with ready job-seekers possessing the requisite skills required for employment, is a critical step toward developing a cohort group of employers who will hire from a more diverse workforce pool than from the past.

**Outcomes**

The Board will track local outcomes for employment, wages and job retention for WIOA participants for whom services have been targeted. Data will be collected from NEworks to inform the Board and Service Provider of progress and modifications to the Plan. Impact on WIOA performance standards on youth and adults, and employer feedback will be reported to the full Board on a quarterly basis.

**Industry Sectors**

Building upon the industry sector based partnerships that began with the Community College, Community Based-Organizations, employers, and the Omaha Workforce Collaborative; HWS will ensure the delivery of training and supportive services as a part of our community’s economic development strategy. Transportation, Distribution, Warehousing and Logistics (TDWL) and Healthcare sectors will serve as the employer sectors that we will utilize to track the impact of standard and innovative service delivery.

**Partnerships**

Community partnerships are key to the long term success of job-seekers. Public school districts, Metropolitan Community College and the other area educational institutions are critical toward educational success of our clients.

**One Stop-American Job Center and Access**

In July 2012, the comprehensive Career Center called the Workforce Solutions Center was relocated from 24th and Lake to 58th and Ames and is now the American Job Center for the local area. New and existing partners moved to the new location with hopes to ensure optimal customer service delivery. Technology will be used to reach more consumers and support their employment goals. Options to access virtual and hands-on services will be incorporated into our planning for ease and accessibility to all services. The Board believes this will improve our ability to deliver high quality customer- focused service. Additionally, access will be sought through partnerships with the area public libraries and at Metropolitan Community College’s Express center in South Omaha.

**Technical Assistance**

HWS is aware that strong outcomes result from well informed workforce career specialists. Specialized training for career specialists and persons who work with difficult populations both in the community and within the American Job Center will be a future focus. The goal will be to bridge the gap between institutions and service providers to offer a seamless means by which clients follow their career pathway and are eventually hired into jobs with livable wages that break the cycle on unemployment or underemployment.

* 1. **Analysis of Local Economic and Labor Market**

*(The Workforce Innovation and Opportunity Act requires that local plans identify an assessment or evaluation of local economic and labor market needs. Each plan shall include the following:*

*a. Identify current and projected trends of the local area’s economy, industries and occupations.*

Three County Area (Sarpy, Washington, Douglas-Omaha MSA)

(LEHD State of Ne County Reports http://lehd.ces.census.gov/applications/qwi\_online/)

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Economic Indicators** | **2009** | **2010** | **2011** | **2012** |
| Total Employment | 381,876 | 378,202 | 380,420 | 388,560 |
| Net Job Flows | (1,868) | 2,787 | 2,275 | 3,182 |
| Job Creation | 14,279 | 16,073 | 15,230 | 16,860 |
| New Hires | 47,055 | 49,686 | 50,507 | 55,774 |
| Separations | 56,602 | 53,775 | 55,312 | 59,638 |
| Simple Avg. Monthly Earnings | $3,471.50 | $3,526.00 | $3,619.67 | $3,730.33 |
| Simple Avg. New Hire Earnings | $2,162.08 | $2,055.17 | $2,146.58 | $2,395.33 |

*b. Describe the workforce skills and knowledge individuals need to find current and future employment in the local area. Please provide evidence these skills and knowledge are employer identified and necessary for economic growth in the local area.*

Some of the priority needs identified by business and industry are:

• Better information on the services available through the American Job Center

• Quick access to diverse, qualified workers with strong employability skills

• Accurate, timely, easy-to-use local, state and national labor market information

• Resources to train incumbent workers

• Resources to train pre-employment workers

• Workforce development partnering in economic development strategies

• Recruitment, assessment and matching support for job openings and for customized job training programs

• Resources for supervisory, management and leadership training for existing employees

Some of the priority needs of worker and job seekers are:

• Strong support services (resources for daycare and transportation)

• Re-entry support for ex-offenders

• Veterans and eligible spouses

• Individuals in need of English as a second language and refugees

• Work ethic and employability skills

• Spousal and dependent job search assistance for new residents

• Simple and easy to use system

• Basic computer literacy and customer service skills

• Flexible hours of operation

• Basic skills education

• Technical skills necessary for employment

• Assessments about skill levels and career interests

• Assistance in developing employment/training plan

Employers indicated that once workers were hired out of the workforce development system and in place, they were unable to successfully retain or compete for jobs that would yield higher wages or career growth. To address this issue, the Greater Omaha area will continue to offer training and assessment, coaching and mentoring on employability skills. These skillsets will continue to be monitored and retested to ensure workers are successful once employed. *(Source: Omaha Workforce Collaborative Evaluator Report, First Quarter, 2011, Prepared for Greater Omaha Chamber of Commerce by Capital Analytics and Bellevue University’s Human Capital Lab, May 12, 2011)*

Some of the workplace competencies that employers want are:

• Learning to Learn

• Reading, Writing and Computation

• Digital literacy

• Communication: Understanding Ideas and Information

• Adaptability: Creative Thinking and Problem Solving

• Self-Esteem Goal Setting, Motivation and Personal/Career Development

• Interpersonal Skills, Negotiation and Teamwork

• Organizational Effectiveness and Leadership

• Initiation: Anticipation of needs, proactive

*(Source: Adapted from Workplace Basics: The American Society for Training & Development, U.S. Department of Labor, Employment and Training Administration and Employer Focus Group, Tri County Chamber of Commerce, May 3 and 4, 2005.)*

*c. Describe the characteristics of the local area's population. Describe specific needs of diverse sub-populations including those from racial, ethnic, linguistic groups, older persons, and individuals with disabilities.*

**Racial and Ethnic Literacy Challenges**

Minority communities have been particularly hard hit, with some high minority rate census tracts for the 3-county area reporting unemployment rates of 31-32%, with income levels of $10-12,000 and poverty rates of 40-50%. In these same areas, education levels are at critical lows, with only one third of residents over age 18 having completed high school or earned a GED. Overall minority high school graduation rates are at 57%, with minority unemployment rates hovering near 20%. (*Source: Nebraska Department of Education and American Community Survey (U.S. Census))*

**English as Second Language and Refugee Populations**

ESL and Refugee Populations: HWS is a subscriber to Legal Language Services to assist with translations for those who come to the Center and are unable to communicate in English. This service assists with translating over 200 languages and dialects so that anyone seeking services through the American Job Center will not be turned away due to limited English-speaking skills. WIOA staff participates in the Refugee Task Force meetings. A representative from Lutheran Family Services was able to do a presentation for front-line staff and management on the history of refugees in the local area and their needs.

A significant number of people served by HWS have tremendous barriers before them that must be dealt with before that person can realistically pursue self and family sustaining employment. Educational and literacy deficits are among the most difficult to remedy.

**Older Persons**

The number of persons over age 55 who wish to continue to work or are interested in second careers is growing. Partnerships with the Eastern Nebraska Office on Aging and Experience Works provide work experience opportunities, job search assistance, and when appropriate, intensive and training services. The Title V partners provide workshops at the American Job Center to specifically address issues faced by the mature workforce seeking employment.

**Ex-Offender Population**

Another subset of the population the area serves is ex-offenders. Each year over 18,000 individuals are returned to the Omaha area by the Douglas County Department of Corrections and another 1,000 return from the state prison system. More than three hundred return from Federal facilities, and another 5,000 are released annually from the Pottawatomie County Jail. Considering totals from the Sarpy County Department of Corrections and all juvenile facilities in the area were not immediately available, and not included in this estimate, it is likely that more than 30,000 individuals return to our community each year from various settings and lengths of incarceration.

These individuals face tremendous challenges in re-starting their lives. Finding and maintaining stable, self-sustaining employment is among the greatest issues they face upon re-entry. Entire industry sectors are often unavailable to them due to their status as ex-offenders. The stigma assigned to ex-offenders along with any existing educational or skills deficits make this population exceedingly hard to serve. The Greater Omaha Workforce Development Area’s situation is unique in the scope in which this problem exists in its region.

**Individuals with Disabilities**

Another aspect of diversity is the number of individuals with disabilities in this area of the state. As reported in the 2000 Census, 142,256 persons aged 5 and older experience some form of disability; including sensory, physical, mental, and self-care disabilities. This number accounts for approximately 23 (23.5%) percent of the total population.

*d. Provide an analysis of the challenges associated with the local area's population attaining the education, skills, and training needed to obtain employment.*

Analysis of data shows a large number of individuals who have been unemployed for 15 weeks or more. This speaks to the chronic nature of the issue of unemployment in the area. Many of these individuals require remedial education, workplace literacy skills and a need for specific skilled training to hold a living wage job. Historically, Greater Omaha’s challenges are the number of youth and adults in this category who do not have a High School diploma or equivalency or have graduated but do not have command of applied math or English at an eighth grade or higher level. Many of these persons are not competitive in the workplace, or may have complex co-occurring social barriers that must be addressed before they would be successful candidates for job placement. Other persons that fall into this category are ex-offenders, who may be qualified to hold a job, but are disqualified by employers simply because of their criminal record.

*e. Describe specific strategies the local WDB and American Job Center Operator are or will be implementing during this plan period to insure the skill needs of local employers is met and to close any existing skill gaps. Strategies should include partner agencies that target populations in diverse populations.)*

The employers with the highest number of job openings advertised online in Omaha Consortium, Nebraska on February 13, 2014 are Catholic Health Initiatives (502), First Data Corporation (368), ConAgra Foods, Inc. (228), Alegent Creighton Health (144), H&R Block (133), University of Nebraska Medical Center (112), YMCA of Greater Omaha (110), Pizza Hutt, Inc. (107), Cornerstone Staffing, Inc. (106), and Methodist Health System (104) (Jobs De-duplication Level 1).

The most common minimum education requirement on job openings advertised online in Omaha

Consortium, Nebraska on February 13, 2014 was a High School Diploma or Equivalent with 45.11% of the total specified. The second most common requirement was a Bachelor's Degree with 39.80% of the total specified.

The most common education level of potential candidates in the system in Omaha Consortium, Nebraska on February 13, 2013 was a High School Diploma or Equivalent with 35.58% of the total specified. The second most common level was a 1 to 3 Years at College or a Technical or Vocational School with 30.41% of the total specified.

The most common minimum experience requirements on job openings 2 Year to 5 Years with 43.52%, both with 37.45% of the total specified.

The most common experience level of potential candidates in Omaha Consortium, Nebraska on February 13, 2014 was More than 10 Years with 49.19% of the total specified. The second most common requirement was 5 Years to 10 Years with 17.49% of the total specified.

The average weekly wage for Omaha Consortium, Nebraska in 1st quarter, 2013 was $886. This would be equivalent to $22.15 per hour or $46,072 per year, assuming a 40-hour week worked the year around.

Industries that are growing rapidly and employ a substantial number of workers are identified as critical industries. In the Greater Omaha Local Area, the following industries have been recognized as ‘critical’ according to the Nebraska Department of Labor.

**Greater Omaha (GO) Local Area ‘Critical’ Industries” Identified; EMSI Occupation Projections to 2023**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **SOC Number** | **Industry Title** | **2013 Jobs** | **2023 Projection** | **Numeric****Change** | **% Change** |
| 11-0000 | Management Occupations | 14,316 | 15,912 | 1,596 | 11.1% |
| 13-0000 | Business and Financial Operations Occupations | 23,238 | 26,624 | 3,386 | 14.6% |
| 15-0000 | Computer and Mathematical Occupations | 16,302 | 18,153 | 1,851 | 11.4% |
| 17-0000 | Architecture and Engineering Occupations | 5,017 | 5,693 | 676 | 13.5% |
| 19-0000 | Life, Physical, and Social Science Occupations | 2,689 | 3,100 | 411 | 15.3% |
| 21-0000 | Community and Social Service Occupations | 5,086 | 5,745 | 659 | 13.0% |
| 23-0000 | Legal Occupations | 2,506 | 2,703 | 197 | 7.9% |
| 25-0000 | Education, Training, and Library Occupations | 22,514 | 25,437 | 2,923 | 13.0% |
| 27-0000 | Arts, Design, Entertainment, Sports, and Media Occupations | 5,515 | 6,080 | 565 | 10.2% |
| 29-0000 | Healthcare Practitioners and Technical Occupations | 25,677 | 29,293 | 3,616 | 14.1% |
| 31-0000 | Healthcare Support Occupations | 10,111 | 12,179 | 2,068 | 20.5% |
| 33-0000 | Protective Service Occupations | 6,735 | 7,432 | 697 | 10.3% |
| 35-0000 | Food Preparation and Serving Related Occupations | 32,661 | 35,848 | 3,187 | 9.8% |
| 37-0000 | Building and Grounds Cleaning and Maintenance Occupations | 11,087 | 13,014 | 1,927 | 17.4% |
| 39-0000 | Personal Care and Service Occupations | 12,229 | 14,967 | 2,738 | 22.4% |
| 41-0000 | Sales and Related Occupations | 44,644 | 47,487 | 2,843 | 6.4% |
| 43-0000 | Office and Administrative Support Occupations | 69,091 | 74,222 | 5,131 | 7.4% |
| 45-0000 | Farming, Fishing, and Forestry Occupations | 548 | 552 | 4 | 0.7% |
| 47-0000 | Construction and Extraction Occupations | 15,539 | 18,510 | 2,971 | 19.1% |
| 49-0000 | Installation, Maintenance, and Repair Occupations | 13,513 | 14,866 | 1,353 | 10.0% |
| 51-0000 | Production Occupations | 21,272 | 22,755 | 1,483 | 7.0% |
| 53-0000 | Transportation and Material Moving Occupations | 30,826 | 34,139 | 3,313 | 10.7% |
| 55-0000 | Military occupations | 0 | 0 | 0 | 0.0% |
| 99-0000 | Unclassified Occupation | 0 | 0 | 0 | 0.0% |
|  | Total | 391,115 | 434,711 | 43,596 | 11.1% |

 *Source: QCEW Employees - EMSI 2013.4 Class of Worker*

**EMSI Industry Data, Projections to 2023**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| NAICS Code | Description | **2013 Jobs** | **2023 Jobs** | **Numeric Change** | **Percentage Change** |
| 11 | Agriculture, Forestry, Fishing and Hunting | 528 | 512 | -16 | -3.0% |
| 21 | Mining, Quarrying, and Oil and Gas Extraction | 79 | 166 | 87 | 110.1% |
| 22 | Utilities | 1,010 | 952 | -58 | -5.7% |
| 23 | Construction | 19,343 | 23,544 | 4,201 | 21.7% |
| 31 | Manufacturing | 25,606 | 27,418 | 1,812 | 7.1% |
| 42 | Wholesale Trade | 14,714 | 15,110 | 396 | 2.7% |
| 44 | Retail Trade | 43,780 | 46,698 | 2,918 | 6.7% |
| 48 | Transportation and Warehousing | 18,486 | 20,924 | 2,438 | 13.2% |
| 51 | Information | 10,745 | 11,094 | 349 | 3.2% |
| 52 | Finance and Insurance | 29,485 | 31,376 | 1,891 | 6.4% |
| 53 | Real Estate and Rental and Leasing | 5,178 | 5,526 | 348 | 6.7% |
| 54 | Professional, Scientific, and Technical Services | 26,382 | 31,840 | 5,458 | 20.7% |
| 55 | Management of Companies and Enterprises | 11,646 | 12,775 | 1,129 | 9.7% |
| 56 | Administrative and Support and Waste Management and Remediation Services | 25,736 | 30,010 | 4,274 | 16.6% |
| 61 | Educational Services (Private) | 6,092 | 6,963 | 871 | 14.3% |
| 62 | Health Care and Social Assistance | 51,534 | 61,287 | 9,753 | 18.9% |
| 71 | Arts, Entertainment, and Recreation | 8,319 | 9,125 | 806 | 9.7% |
| 72 | Accommodation and Food Services | 30,354 | 33,048 | 2,694 | 8.9% |
| 81 | Other Services (except Public Administration) | 10,961 | 11,907 | 946 | 8.6% |
| 90 | Government | 51,138 | 54,435 | 3,297 | 6.4% |
| 99 | Unclassified Industry | 0 | 0 | 0 | 0.0% |
|  | Total | 391,115 | 434,711 | 43,596 | 11.1% |

*Source: QCEW Employees - EMSI 2013.4 Class of Worker*

Of these critical industries, the area has focused its resources on the following targeted industries through funding received from National Fund for Workforce Solutions. These industries are: transportation/distribution/logistics (TDL), and health care. Employer-led sector groups will be re-formed with a goal of designing collaborative initiatives that include training, screening, hiring and career pathway opportunities for low income individuals. The sector industries will continue to define workforce development priorities for the next several years as they grow their business plans and increase their employment capacity through a stronger workforce.

In looking at the data provided by the Nebraska Department of Labor, the ten occupations with the best job prospects based on growth rate, total openings and 10-year employment change are shown below for the Greater Omaha area.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Occupation Group | 2010 Estimated Employment | 2020 Projected Employment | Numeric Change | % Change |
| Office and Administrative Support Occupations  | 75,915 | 81,089 | 5,174 | 6.8% |
| Sales and Related Occupations  | 50,853 | 54,897 | 4,044 | 8.0% |
| Transportation and Material Moving Occupations  | 35,912 | 41,108 | 5,196 | 14.5% |
| Food Preparation and Serving Related Occupations  | 33,640 | 37,019 | 3,379 | 10.0% |
| Healthcare Practitioners and Technical Occupations  | 27,550 | 31,815 | 4,265 | 15.5% |
| Education, Training, and Library Occupations  | 27,612 | 30,998 | 3,386 | 12.3% |
| Business and Financial Operations Occupations  | 26,960 | 30,990 | 4,030 | 14.9% |
| Construction and Extraction Occupations  | 21,855 | 26,079 | 4,224 | 19.3% |
| Production Occupations  | 21,660 | 23,247 | 1,587 | 7.3% |
| Management Occupations  | 18,863 | 20,316 | 1,453 | 7.7% |

HWS is aware of the human, natural and energy resources that are unique and available to the local area. HWS has written letters of commitment and support for agencies that apply for Federal grants, including “green” grants. HWS supports and approves Eligible Training Provider initial applications that are focused on trainings for “green” jobs, many of which reside across industry sectors, especially in manufacturing and trades.

Green jobs are also included under “Dynamic Occupations” as defined in the Demand Occupations Policy that went in effect in 2009.

* 1. **Plan Development** *(Describe the steps for developing the local plan, including:*

*a. Timeline*

*b. Consultation process with the local elected official(s), local Workforce Development Board, members of the public including representatives of businesses and representatives of labor organizations, and other partners*

*c. Actions taken to acquire other input into the plan development process*

*d. Dates the plan was posted electronically to the local website*

*A summary of the comments received (including comments from businesses and labor organizations) should be included in the Attachment section. If no comments were received, please include a statement to that effect.)*

The draft of the Greater Omaha transition Local Plan for WIOA was developed following WIOA education sessions on March 18, 2015 and April 7, 2015 and discussions at the Youth Council, Performance Committee, and Executive Committee. Additional strategic planning discussions will occur as part of the regular board process. In this way, a strategic focus can be set and adjusted as needed following mission-driven objectives.

In March 2015, the Nebraska Department of Labor issued a policy entitled Local Plan Instructions. This provides a framework for the local workforce investment plan. The HWS WIOA Transition Local Plan was drafted based on those instructions and in the required format. Revisions to the draft will be made as needed, based on feedback received as a result of the public posting of the draft document. Notice was published in the Omaha World Herald and is being sent to the Chief Elected Official, county representatives, business organizations, organized labor, state agencies, the local service provider and other public and private agencies. Notice of the work on the new plan will be provided at the public meetings of the HWS Executive Committee on 4-21-15, the full Board on 4-23-15. The draft plan was posted on the HWS web site on 4-16-15 with a notice that public comments are being taken through May 17, 2015. The final draft will be posted to the NDOL website by 5-29-15.

The HWS Executive Committee will meet again on May 19, 2015 to discuss the transition plan and to approve the draft of the HWS Workforce Development Board WIOA Transition Local Area Plan. Feedback will continue to be sought from staff and by the general public until a final plan is submitted.

In summary, the local plan was developed with input from meetings with the Board and Committees to discuss all sections of the plan, progress to date on issues, any changes that have occurred and new, future directions. Meetings were held with the Service Provider staff members to gather and discuss the same information. For this plan, any modifications and changes were discussed with Board Committees and members and service provider staff and Chief Elected Official when required.

1. **ADMINISTRATIVE SECTION**
	1. **Organization**
		1. Chief Elected Official

*1) Identify the chief elected official by name, address, phone number, and email.*

Mayor Jean Stothert

 City of Omaha

 1819 Farnam Street, 3rd Floor

 Omaha, NE 68183

 PH: 402-444-5000

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*2) Describe the process utilized to secure the chief elected official agreement. Current agreements for the time period of this plan are a required attachment of the final local plan.*

The original operating agreement was developed in 1999 and entered into by the then Mayor, Hal Daub as the Chief Elected Official, City of Omaha, the counties of Douglas, Sarpy, and Washington, and the then Tri-County Alliance Workforce Investment Board. In 2014, working with the City of Omaha’s Legal Department and in conjunction with the Mayor of Omaha, Jean Stothert, representatives from the boards of Douglas, Sarpy, and Washington counties, and Heartland Workforce Solutions Board, a new chief elected official agreement was created. It set forth all of the interaction necessary to carry out activities relative to the Workforce Investment Act (WIA). This Inter-local Agreement was signed and adopted by resolution by each county of the local workforce investment area. This year (2015), the agreement was reviewed and updated to incorporate WIOA and specific changes to the Board structure.

The CEO Agreement and the CEO/WIB Agreements are found in Attachments G & H respectively.

* + 1. Workforce Development Board

*1) Describe the structure, including the nomination process, of the Workforce Development Board (WDB). A current agreement between the chief elected official and the WDB, a WDB member list, and current WDB By-Laws are required attachments of the final local plan.*

In 1999, the Operating Agreement to activate the local plan was entered into by and between then Mayor Hal Daub (Chief Elected Official), City of Omaha and the Tri County Alliance Workforce Investment Board (the WIB). This agreement set forth all of the interaction necessary to carry out activities relative to the Workforce Investment Act (WIA). The Operating Agreement was developed by the City of Omaha Legal Department in cooperation with the local Board and the then Chief Elected Official, Mayor Hal Daub, City of Omaha. The City of Omaha Legal Department established the Local Workforce Investment Area Inter-local Agreement for (Omaha) the County of Douglas, Nebraska, (Douglas County), the County of Sarpy, Nebraska (Sarpy County), and the County of Washington, Nebraska (Washington County), all political subdivisions of the State of Nebraska. The Inter-local Agreement was signed and adopted by Resolution by each county.

As the result of a federal review with the Nebraska Department of Labor (NDOL) and the Greater Omaha area, NDOL revised the Criteria for Local Workforce Investment Boards Policy (Posted 1-10-14) requiring that new Chief Elected Official Agreements be done upon the election of a new Chief Elected Official. The Greater Omaha Workforce Investment Area began working on this process in January 2014 and a draft of the new Inter-local Agreement was approved by each of the Counties and the City of Omaha. This agreement is now being reviewed to bring it into compliance with WIOA.

The Heartland Workforce Solutions (HWS) Board is made up of members representing business, community partners, community based organizations, economic development, labor and government entities. At least 50% plus one of Board members are private business representatives. The WDB Membership list is Attachment U to this document.

The Chief Elected Official appoints all members to the HWS Board. Nominations for such appointments, based on what sector of the community they are to represent (i.e. business, education, labor), may originate from various applicable sources such as the Chief Elected Official, current board members, community partners, local chambers of commerce, educational agencies, labor organizations and the general public.

A nomination is made by completing the Local Area Nomination Form and submitting it to the HWS Board staff along with a copy of the nominee’s resume (optional) and any other supporting documentation, such as a nomination letter. This information is reviewed for accuracy and faxed or emailed to the Chief Elected Official’s office. Upon review and approval, the Chief Elected Official forwards a letter to the nominee officially notifying them of their appointment to the Board. The HWS Board has outlined the basic nomination process in the HWS By-laws that are attached to this plan as Attachment T.

The composition of the HWS Board is in compliance with the Workforce Innovation and Opportunities Act, Section 107, and with the Nebraska Department of Labor’s Policy issuance entitled “Criteria for Local Workforce Investment Boards.”

*2) Describe how the business members of the WDB play a leading role in ensuring the workforce system is demand-driven.*

HWS Board business members play an important advisory role when collaborating with the One Stop Operator, Service Provider and Board staff. The business members serve as real-time testimonials as to the needs of the labor market, thereby enhancing the legitimacy of the workforce development system.

Through the HWS Board meetings, Committee meetings and related activities, business members are provided opportunities to network and conduct outreach to other business members and customers. Ultimately, as business leaders in the Local Area, the HWS Board business members ensure that the system has a focus of building strong partnerships with business and One Stop Career Center services are customized to meet the changing business demands in the community. In addition, four private business members were also added to the Executive Committee to allow for greater input and as part of succession planning for future leadership positions.

The HWS Board is highly supportive of business partnerships. The Vision Statement of “Full employment for all drives economic growth and stability for Greater Omaha” is reflective of the importance of working collaboratively with businesses to ensure that those receiving training through the WIOA programs will gain employment. Efforts to build on past partnerships such as the Ophthalmic Assistant Program, Pre-trades Welding, and Customer Service training continue to grow. Two industry sector groups have been developed to work on keep issues. They involve Healthcare and the Transportation, Distribution, and Logistics (TDL) industries. In 2015, a new focus on Manufacturing has been developed. A Business and Industry Partnership was formed to develop a strategic action plan for sector partnerships.

Under the HWS Performance Committee, in collaboration with the Adult and Dislocated Worker WIOA Service Provider, criteria were developed and a corresponding policy was formulated to define and document in-demand occupations. Input from all Committee members, including business representatives was utilized to create the policy. The policy guides the enrollment of all Adult and Dislocated Worker, and now Youth, WIOA clients and is revisited as necessary to make changes to reflect variations in the local job market. A sub- committee under the Performance Committee was formed to review the Accreditation Policy through HWS. This process, described in the Operations Section of this plan, details the steps an eligible training provider must complete in order to be eligible to receive WIOA funds in exchange for providing training services to clients.

*3) Identify the circumstance which constitutes a conflict of interest for any local Workforce Development Board member.*

All HWS Board members shall comply with the provisions of Neb Revised Statute §49-1499 through 49-14,103.07 and Section 107(h) of WIOA regarding conflicts of interest.

A board member must disclose with particularity the nature and extent of any financial interest in or affiliation with any person, business or organization that is seeking anything of value from the Board prior to consideration of the request by the Board.

Under Section 107 (h) of the Workforce Innovation and Opportunity Act (WIOA), board members may not vote on a matter under consideration regarding the provision of services by such member or by an entity that such member represents or that would provide direct financial benefit to such member or the immediate family of such member. As defined by 29 USCA § 2832 –”A member of a local board may not (1) vote on a matter under consideration by the local board (a) regarding the provision of services by such member (or by an entity that such member represents); or (b) that would provide direct financial benefit to such member or the immediate family of such member...”

In order to ensure compliance with conflict of interest policies, the conflict of interest language in the cited regulations above shall be included on any public meeting agenda. Notification to the affected Board member and Board leadership shall be made if a possibility of a conflict of interest exists on any vote. This notification shall be made by placing notification on the agenda itself and possible notification may be made to the Board member before the meeting. Lastly, Board member conflict of interest will be considered when seeking Committee Chair positions and may prevent these representatives from holding such positions. If a Board member votes on matters that constitute a conflict of interest, the first incident shall result in a warning by the Chair of the Board. If a Board member insists on voting on matters that constitute a conflict of interest, the Board member will be removed from the Board.

*4) Describe the membership of the local Youth Council and the process used to determine the appointments. Identify the responsibilities of this council. Specify if this includes recommending eligible youth service providers and conducting oversight with respect to eligible providers of youth activities. A current Youth Council membership list is a required attachment of the final Local Plan.*

The Youth Council shall act as a standing committee within the HWS Board and carry out those duties established by the HWS By-laws. The Youth Council shall be a standing committee and will have the authority to investigate and make recommendations to the HWSB or the Executive Committee.

The Youth Council Chair is authorized to make all appointments to the Youth Council. Membership of the local Youth Council includes:

• Members of the WDB with special interest or expertise in youth policy;

• Representative of youth service agencies, including juvenile justice and local law enforcement agencies;

• Representative of local public housing authorities;

• Parents(s) of youth, including, but not limited to, parents of eligible youth seeking assistance under the Nebraska Workforce Investment Act;

• Individuals, including former participants, and representatives of organization that have experience relating to youth activities;

• Representative of the Job Corps, as appropriate; and

• Representatives of local kindergarten through grade twelve school boards, community colleges, and such other individuals as the chairperson of the local board, in cooperation with the chief elected official, determine to be appropriate.

Individuals serving on the Youth Council who subsequently retire or no longer hold the position that made them eligible council members may not continue to serve on the Youth Council as a representative of that segment but may stay involved if interested. The Youth Council’s mission is to prepare youth today for employment tomorrow. Through a common community vision, the Youth Council becomes actively engaged in planning and managing youth funds received in the local area under Workforce Innovation and Opportunity Act (WIOA) to support its stated mission. The primary responsibilities of the Youth Council are to provide expertise in youth policy, advise the Performance Committee of the HWS Board and assist the local Workforce Development Board (WDB) as appropriate. Other responsibilities include:

• Developing recommendations for the portions of the local plan relating to eligible youth

• Recommending eligible providers of youth programs be awarded grants or contracts on a competitive basis by local board to carry out the youth programs, in collaboration with the Board and Performance Committee

• Conducting oversight with respect to the eligible providers of youth activities in the local area, in collaboration with the Board and Performance Committee

• Coordinating youth activities authorized under WIOA

• Coordinating youth career preparation programs

• Broadening the youth employment and training focus in the community to incorporate a youth development perspective

• Promoting and marketing the goals, activities and accomplishments of the Youth Council

• Other duties determined to be appropriate by the Chair of the local board

*5) Describe how the local WDB shall coordinate and interact with the local elected official(s)****.***

Buy-in, support and participation of the Local Chief Elected Official (LCEO) for the Greater Omaha area is important. Engagement begins with information and communication. Therefore, to help keep the LCEO informed of activities of the Board and to ensure consistent communication, a representative from that office will be appointed to serve on the HWS Board. In addition, the Board’s Executive Director will meet with the Chief Elected Official as needed to discuss issues and share information. Since the HWS Board represents three counties, the Inter-local Agreement adds a representative from each County Board to the HWS Board to enhance their involvement in the planning processes and to help keep information flowing on activities in the local area.

The Board may also report to members of the Omaha City Council, local state senators, or other elected officials.

*6) Explain how the local WDB shall ensure nondiscrimination and equal opportunity.*

The HWS Board will ensure nondiscrimination and equal opportunity by adhering to all federal and state laws and regulations and has established a complaint/grievance policy to allow submission and investigation of complaints/grievances regarding nondiscrimination and equal opportunity. Postings of law are located within each HWS administered facility and documented in procedure and policy guidelines. The policy and practice directs complaints to HWS offices for questions and grievance instructions. Contact information is also available on the HWS website. The HWS Board will adhere to the Equal Opportunity Methods of Administration per HWS policy and practices. The HWS Board will also require each contractor, subcontractor, and/or recipient of WIOA funds to assure they will not discriminate or deny program access on the basis of race, color, national origin, age, handicap, sex, religion, citizenship, political affiliation, or belief. Other activities shall include onsite monitor reviews to insure that recipients of grant awards have policies in place, proper posters and systems in place to allow the submission of grievances/complaints in Spanish or English.

*7) Explain what strategies the CEO and local WDB shall create to utilize the leadership of faith-based and neighborhood partnerships.*

 The HWS Board will make local area efforts to:

• Appoint members to the Board and committees who are specifically familiar with local grassroots faith- based organizations to work alongside representatives who are familiar with a broad range of other community groups and service providers;

• Create campaigns that will educate appropriate local faith-based and community- based organizations about the workforce investment system, including available grants and opportunities for participation and partnership with the American Job Center;

• Ensure that information on websites about applying for grants or becoming service providers is easy to find and understand for those non-profit organizations seeking to partner with the workforce investment system;

• Ensure that beneficiaries and prospective beneficiaries of their programs understand their rights by having literature available for the beneficiaries explaining their rights; and

• Keep informed about the latest opportunities and outreach materials by accessing the U.S. Department of Labor's Center for Faith-Based and Community Initiatives at their website at <http://www.dol.gov/cfbnp>.

*8) Describe the intended waiver process (if any) to be used by the local WDB using the criteria by which the state shall determine if local WIBs may provide programs in-house.*

At this time, the HWS Board does not foresee changing any requests for waivers to operate programs and will abide by those that are in place by Nebraska Department of Labor. If, based on strategic planning or restructuring, a change is needed, an appropriate revision to this plan will be made.

* + 1. Administrative Entity

 *1) Identify the administrative staff and their responsibilities in carrying out the work of the local WDB.*

Heartland Workforce Solutions, Inc. (HWS) staff currently serves as the Administrative Entity for the Board and WIOA programs. Staff include: Executive Director Erin Porterfield; Director of Operations Shirley Carlson; Finance Officer Michael Phillips; and Office Manager Donna Knerr. HWS assumed full Fiscal Agent responsibilities for administrative and program costs on January 1, 2011. The accounting responsibilities fall under the Finance Officer and Officer Manager with the Director of Operations serving as back-up to these positions. The Director of Operations also provides oversight of the American Job Center (comprehensive One Stop) and WIOA services for the local area and direct support to the Youth Council and Performance Committee. The Executive Director with the assistance of the rest of the staff, provides Board support and overall management of Board activities and responsibilities.

* 1. **Local Vision, Goals and Priorities**

*The vision, goals and priorities of the local plan must be consistent with the state plan and take into account and reflect on the U.S. Department of Labor’s Employment and Training Administration’s (ETA) current policy emphasis and strategic priorities. TEN 15-10 stated: “With the many competing priorities that the workforce system is facing during this challenging economic environment, it is critical that the system ensure priority of service to veterans and their eligible spouses.” TEGL 15-10 announced ETA’s “commitment to the Secretary of Labor’s High Priority Performance Goal to increase credential attainment by participants of the public workforce system.” Also, ETA’s New Strategic Vision for the Delivery of Youth Services (TEGL 28-05), and their Vision for 21st Century Apprenticeship (TEN 17-06) are useful resources and should be addressed.*

*a. Outline the vision, goals, and priorities for the local area as identified by the local WIB and Chief Elected Official. Include planning efforts conducted by the local WDB and Chief Elected Official in the past 12 months.*

Per the State Strategic Plan, the Nebraska Vision states “Our vision for the years ahead must be about preparing Nebraska to compete in the 21st Century, in an age of technological marvels, new educational challenges, international competition and entrepreneurial opportunity.” The Governor’s Vision is expressed in six goals:

1. Build strong, effective relationships with employers.

2. Create opportunities for stakeholders in Nebraska’s Workforce System to collaborate and find solutions to workforce issues

3. Explain the use of technology as a way to communicate, collaborate, and streamline services

4. Implement innovative approaches to deliver employment and training services to Nebraskans in all 93 counties

5. Build Nebraska’s reputation as one of great job opportunities for all members of the workforce

6. Collaborate with statewide initiatives such as Forging Nebraska’s Future, the Entrepreneur Acceleration Program.

In addition, the State Strategic Plan includes four priorities that lead to the actualization of the goals described above. These goals will be integrated into the strategic planning process as the HWS Board continues to restructure itself and the local system under WIOA. With the advent of the new HWS Executive Director in October 2013, multiple meetings have been held with the HWS Board Chair and the Chief Elected Official’s office to review the vision and priorities for the local area. Information on actions and potential plans are regularly shared at Board meetings.

Our local WDB mission, goals and values:

MISSION: To promote and develop a workforce system that is responsive to the needs of business and career seekers resulting in economic prosperity

VISION: HWS, with our partners, will lead, through alignment and coordination, collectively impacting economic and workforce development.

CORE VALUES:

•Focus on service excellence, emphasizing a welcoming environment, treating all customers with dignity, respect, and compassion.

•Promote a synergistic atmosphere, where we concentrate on connections, partnerships, teamwork, and the community.

•Foster a team environment where innovation is critical. We will provide guidance, encouraging creativity, developing best practice models relevant locally, regionally, and nationally.

During a strategic planning session held on August 28, 2014 and facilitated by representatives from Omaha Public Power District, the need for strategic action plans was identified. Groups were developed to address key issues. These plans will be brought together to form a full, comprehensive action plan for the Board.

*b. Identify "action steps" the local WDB and delivery system will take to contribute to reaching the local vision, goals, and priorities.*

In an effort to align with the State Strategic Plan goals and priorities, the following HWS Board goals and outcomes have been established.

**State Priority—Cross Program Strategies:** integration of strategies for special populations and subpopulations to meet the workforce needs of the state’s employers, and regional and sector strategies tailored to the state’s economy.

 **HWS Board Goal:** Create an infrastructure to increase the knowledge and understanding of services available to partners and employers and to enhance collaboration to improve relationships and outcomes.

*Outcome: Infrastructure of communication is in place to efficiently connect partners together with employers to increase linkage of people with service and employment.*

This goal will be addressed by implementing the following strategies:

* Convene meetings and roundtable discussions with partners and/or employers to include both those currently involved with the American Job Center and those who are not. These meetings could serve to both share information and gather information to help set additional goals on a community wide level.
* Partner with a variety of agencies to train staff to offer the “Bring Your “A” Game to Work” curriculum to job seekers to enhance soft skills and improve job retention rates. This is designed to have a collective impact on a major concern of employers.
* Research the development of a common intake system that will allow partners to actively communicate and make referrals to each other. It will also serve as a way to gather data on shared clients and other information related to the workforce.

**State Priority—Partnerships:** In order to successfully implement strategies, regular communication and planning will need to be robust among the partners.

 **HWS Board Goal:** Serve as the conduit between business and a skilled workforce.

*Outcome: A structure is in place for partner and business to implement strategies resulting in workforce system efficiency and responsiveness to the needs of consumers and businesses.*

This goal will be addressed by implementing the following strategies:

* Convene sector groups and education stakeholders in response to the Omaha Industry and Workforce Analysis completed by the Economic Modeling Specialist Intl. (EMSI) February 2014 for the Greater Omaha Chamber in conjunction with the Nebraska Department of Economic Development.
* Identify systemic strategies developed by sector groups and stakeholders to escalate the pace of skilled workforce to meet business occupation needs.
* Implement systemic strategies and measure progress

**State Priority—Leveraging Resources:** Leveraging and coordinating grant funding through joint planning, cross training of staff, and participant co-enrollment. This is designed to meet the Governor’s vision to build a system that supports the workforce needs of job seekers and employers.

 **HWS Board Goal:** Develop Board resources and enhance community recognition of the programs and services and to have a greater impact for both the job seeker and employer customers by coordinating and leveraging shared resources.

*Outcome: Board, partners, businesses, and community stakeholders align resources from human capital, funding, program, to further our local workforce goals.*

This goal will be addressed by implementing the following strategies:

* Create networking opportunities by developing Board “socials” at which a Board member will invite theirs and other companies’ staff to host a gathering at the American Job Center. This will allow for sharing of information about the Center and services as well learning more about the businesses.
* Provide educational opportunities at the Board meetings to help inform the members about the needs and opportunities to interact.
* Analyze the funding structures, both public and private, to see how these can be enhanced. This will be done through the creation of a fund development task force. This group will also review and make recommendations regarding funding opportunities through private funders, grant opportunities, holding a funding summit, etc.

**State Priority—Policy Alignment:** Align policies, operations, administrative systems, and other procedures to assure coordination and avoid duplication of workforce programs and activities.

 **HWS Board Goal:** Use collaborative integrated data system to influence state and local workforce policy led by the Performance Committee.

*Outcome: Common data system and intake are in place among partners to enhance coordination for customers, understand trends, opportunities and adjust the workforce system to meet needs.*

This goal will be addressed by implementing the following strategies:

* Convene stakeholders to identify needs and uses for a collaborative data system for the workforce system. Identify and implement data system with partners that will include an MOU. Generate and analyze reports that identify trends. Identify short and long term strategies to adjust workforce system of service through: policy change, public awareness, fund raising, targeted education, and program enhancements.
* Understand and communicate methods to escalate the pace of the workforce needed locally.
* Generate a think tank among business and educational systems. Identify and communicate best practices across the nation.
* Understand and communicate methods to escalate the pace of the workforce needed locally. Generate a think tank among business and educational systems. Identify and communicate best practices across the nation.
	1. **The One-Stop System**

*The establishment of a One-Stop delivery system is a cornerstone of the reforms contained in Title I of WIOA. The One-Stop system is designed to enhance access to services and improve long-term employment outcomes for individuals seeking assistance. The regulations define the system as consisting of one or more comprehensive, physical American Job center(s) in a local area that provide the core services specified in WIOA. Describe the One-Stop delivery system in the local Workforce Development Area. Description must:*

*a. Describe the process for the selection of American Job Center operator(s), including the competitive process or the agreement process between the local board and a consortium of partners.*

The HWS Board will use the following to select the One-Stop Operator(s) for the local area. Eligible entities include [Section 121(d)(2)(B):

• An entity (public, private, or nonprofit), or consortium of entities (including a consortium of entities that, at a minimum, includes 3 or more of the one-stop partners described in subsection (b)(1), of demonstrated effectiveness, located in the local area, which may include--

1. An institution of higher education;
2. An employment service State agency established under the Wagner-Peyser Act on behalf of the local office of the agency;
3. A community-based organization, nonprofit organization, or intermediary;
4. A private-for-profit entity
5. A government agency; and
6. Another interested organization or entity, which may include a local chamber of commerce or other business organization, or a labor organization.

EXCEPTION.—Elementary schools and secondary schools shall not be eligible for designation or certification as one-stop operators, except that nontraditional public secondary schools and area career and technical education schools may be eligible for such designation or certification.

The agreement between the HWS Board and the One-Stop Operator shall specify the operator’s role. That role may range between simply coordinating service providers within the center to being the primary provider of services within the center. A process for selecting a new One- Stop Operator ~~was~~ will be determined in PY15 with the goal that ~~a new~~ an operator be identified to transition no later than July 1, 2016.

**Designation/Certification of the One-Stop Operators:**

The HWS Board with agreement of the Chief Elected Official must designate and certify the One-Stop Operator(s) in the local area. [Section 121(e). The One-Stop Operator(s) will be designated or certified as follows: Through a competitive process to select an entity (public, private, or nonprofit), or consortium of entities (including a consortium of entities that, at a minimum, includes 3 or more of the one-stop partners described in subsection (b)(1), of demonstrated effectiveness.

The designation or certification of the One-Stop Operator must be carried out in accordance with the “sunshine provision” of the Workforce Innovation and Opportunity Act. The designation or certification will be reviewed at least every two years.

*b. Describe the appeals process to be used by entities not selected as the American Job Center operator.*

The HWS Board will utilize the following process for One Stop Operator applicants to appeal a decision of non-selection or decertification.

The applicant must submit a written request for a hearing within 15 days of the initial notification of the Workforce Development Board’s decision. The request for hearing shall specify the reason for non-selection or decertification, if known, and contain a statement as to why the decision should be reversed or a mutual compromise is established.

The Executive Director of the HWS Board shall conduct a meeting within 30 days of the receipt of the request for review and, if appropriate, establish negotiations with the applicant to clarify their initial decision and to allow the applicant to present additional information.

The Executive Director of the HWS Board will issue a decision within 10 days after the hearing. The decision shall identify the reason(s) for non-selection or decertification and the conditions or requirements the applicant must meet in order to be reconsidered, if applicable.

If the applicant is not satisfied with the final decision, the applicant may request a hearing before the Executive Committee of the HWS Board. If not satisfied with the decision of that committee, the applicant may request a hearing before an impartial hearing officer, as outlined in the HWS procedures for complaints and grievances of a nondiscriminatory nature.

*c. Identify the policy and procedures for certification of the comprehensive American Job Center site.*

The Workforce Development Board has established three levels of certification for its One Stop Career Centers: Comprehensive, Affiliate, and Access. Certification status primarily focuses on the following elements: number of co-located One Stop partners (including both mandated and community; full time equivalencies, availability of services, physical environment of the One- Stop Career Center and completed Memorandum of Understanding (MOUs). The requirements of the three levels are as follows:

**COMPREHENSIVE ONE STOP CAREER CENTER (to be designated as an American Job Center)**- requires that all available mandated partners be physically co-located and/or, providing their core services on a part-time or full-time basis, in-person or electronically. The Comprehensive site must have a fully equipped resource area. Completed Memorandums of Understanding (MOU) will be established with all partners at the American Job Center. The HWS Board staff will negotiate the mandated partners’ MOUs and also be responsible for completing the community partners’ MOUs.

**ONE STOP CAREER CENTER AFFILIATE**- Requires that four or more required partners are physically located at the center and that core services are offered on a full-time basis. Staff at an Affiliate Center must regularly attend cross-training on all partner services, must have information or electronic access to all of the system’s services, and have computers available for use by customers. MOUs will describe the specific arrangements with various partners for Affiliate Centers.

**ONE STOP CAREER CENTER ACCESS** – Facility offers at least one staff who is knowledgeable of the WIA partner services and is able to successfully assist or refer clients to those services coupled with the establishment of an electronic network providing integrated core services. The Access site will be driven primarily by technology. The Access site will coordinate and collaborate with the local area comprehensive One Stop Center.

The HWS Board will certify all Career Centers identified in the One Stop delivery system every two years. An onsite review will be conducted to establish certification.

*d. Outline procedures for decertification of American Job Center(s) and/or service providers.*

At any time, the HWS Board may terminate or decertify a One-Stop Center and/or service provider for any one or a combination of the following reasons:

* Failure to meet performance measures for two (2) consecutive years,
* Failure to collect customer satisfaction information and to demonstrate a positive response to customer needs, feedback and ratings, or
* Failure to comply with another term of the memorandum of understanding.

Prior notification is not required for de-certification. However, since the certification/re-certification process will normally occur in April or May, there will be 30-60 days’ notice that the Center has not met the criteria. Written notification will be provided to the One Stop Operator with specific dates identified for responding.

If a site/partner is decertified, the One Stop Operator shall not be allowed to reapply for that site for a period of twelve months. When a site is decertified, the Workforce Innovation and Opportunity Act (WIOA) funds to that site will stop.

*e. Provide overview of the One-Stop Delivery system, including physical site location, operator, personnel, and participating partners. Include organizational chart for the comprehensive American Job Center site.*

*The HWS Board has established a One-Stop Delivery system that serves as a community resource for both job seekers and employers to increase the efficiency with which the right person is matched with the right job, and to offer an abundance of career exploration and job readiness resources in a user-friendly, customer-focused, results-driven environment.*

*This system is based on the following principles:*

* *Streamlining services.*
* *Empowering individuals.*
* *Universal access.*
* *Increased accountability.*
* *Strong role for local Workforce Investment Boards and private sector.*
* *State and local flexibility.*
* *Improved youth programs.*

The HWS Board certified the HWS American Job Center, 5752 Ames Avenue, Omaha, NE 68104 as the comprehensive one-stop center for the Greater Omaha area on October 18, 2012. Recertification will be achieved in May 2015.

The following partners are currently located at the American Job Center: Goodwill Industries, NDOL NEres and JD NEG Services/Veteran Services/ Unemployment Insurance (direct access for the latter), Indian Center Inc., Experience Works, Nebraska Vocational Rehabilitation, Nebraska Commission for the Blind and Visually Impaired, Metropolitan Community College, HWS Offender Employment Program (effective 7-1-15), Impact One Community Connections, Project Everlast, Goodwill’s Goodhire and Restart programs, Veteran’s Financial Coach, Boys Town Family Services, and Grayson’s Nonprofit for Re-entry Services.

The HWS Board has requested that all partners support an integrated model of service delivery as much as possible to be able to provide seamless services to any person entering the Center. Partner staff participate on the functional teams as well as in the monthly partner meetings to discuss delivery of common services.

*f. Identify and describe any affiliate site or agents or specialized centers to be established in the local area. Include any remote sites accessed through the use of technology.*

Although there are no certified affiliate sites in the Greater Omaha area, efforts have been made to expand the outreach efforts to Sarpy and Washington counties by having WIOA staff located on a part-time basis at sites in those counties. Co-locating staff at other sites in the three county area will be explored as the opportunities arise.

*g. Describe how the Workforce Development Board shall engage employers and organized labor in the One-Stop delivery system.*

 The HWS Board will utilize the following strategies to engage employers in the One-Stop Delivery System.

* Create industry-specific employment and training partnerships to assist both the economic development of employers and the advancement of low-wage workers
* Access to training to produce job-seekers who are work-ready by offering life skills, financial literacy, employability, and work maturity skills training
* Encourage employers to assist the HWS Board in identifying training programs that prepare workers for real jobs within their organizations
* Promote the benefits of becoming a Workforce Innovation and Opportunity Act (WIOA) Youth work experience worksite, provide internships and job shadowing opportunities for the emerging workforce
* Make better use of the on-the-job training (OJT) activity as a viable training option for employers
* Utilize customized training to support unique training needs of employers with unmet labor demands
* Offer a variety of business services that appeal to large, medium and small employers particularly in industries with high demand, high growth, and wages meeting the self-sufficiency standards
* Continue to partner in sector based workforce partnership initiatives that create a pipeline of qualified employees for employers
* The One Stop Operator has organized a business services team comprised of business services staff from partners to collaborate on providing comprehensive services to businesses.

Employers are also engaged directly by the Service Provider. The Adult, Dislocated Worker, and Youth Service Provider’s Business Outreach Coordinator is primarily responsible for managing all aspects of work experience and OJT activities within the programs, including coordination with other governmental workforce development agencies when applicable. These staff positions also focus on employer relations and coordinating communications to employers with other partner agencies.

The HWS Board will make use of the following strategies to engage organized labor:

* Support the recruitment of apprentices for demand trades
* Explore opportunities for the creation of pre-apprenticeship programs
* Educate local organized labor regarding the resources available through the American Job Center and provide opportunities for ideas for future partnership initiatives

The HWS Board will make use of the following strategies to engage education.

* Support Nebraska Career Education by creating stronger linkages between career and technical education programs and utilizing the career cluster and pathways language developed by the Nebraska Department of Education.
* Collaborate with community organizations which support the development of career and life skills for students.
* Participate in the development of creative strategies that enable high school students to master the competencies necessary to succeed in the work environment.
* Champion, support and encourage stronger linkages between local industry and the community college system by sharing information related to skill and training gaps, building cooperative relationships and maintaining flexibility in the delivery of programs.

*h. Describe services offered to businesses.*

The WIOA Business Outreach Coordinator and the Youth Business Outreach Specialist have regular contact with area businesses to develop OJT and work experience opportunities and meet the needs of area employers. Business Service Representatives through NDOL have a primary responsibility to conduct outreach services with employers in their community. Training for Business Service Representatives and Managers is provided by the Nebraska Department of Labor on an on-going basis. The formation of a functional business service team is designed to streamline and eliminate duplication on the part of the NDOL and other business service representatives of the partner programs under WIOA as they work with area employers.

Through the American Job Center and NDOL, the following services are provided to employers:

* Labor exchange services
* Recruiting and referral services
* Job postings
* Access to applicant database through NEworks
* Rapid Response/downsizing assistance
* Through the Business Services Functional Team and partners at the Center, knowledge and experience is available to help address company specific needs
* Proficiency tests for typing and data entry
* Labor Market Information and Economic Trends, Occupational Projections and Wage & Benefit Statistics
* Space for on-site recruiting and interviewing
* Information on tax credits, training grants, bonding program, and other employer specific incentives.

*i. Describe universal access and what services shall be provided. Include the strategy for outreach and recruitment. Explain how the services shall meet the needs of dislocated workers, displaced homemakers, low-income individuals including: migrants and seasonal farmworkers; women; minorities; individuals training for nontraditional employment; veterans; public assistance recipients; and individuals with multiple barriers to employment, such as, older individuals, people with limited English-speaking proficiency, and people with disabilities. Include a description of how the local WDB shall ensure physical and programmatic accessibility for individuals with disabilities at American Job Centers.*

Universal Access ensures that all population groups will have access to a wide array of job seeking and employment development services regardless of their eligibility for specific categorical programs. One-Stop Career Centers, will offer a range of services to both employers and job seekers based on individual need. The HWS Board ensures services provided are in compliance with the Workforce Innovation and Opportunities Act, Section 188

by making sure that it is taking appropriate steps to ensure that they are providing universal access to the WIOA Title I-financially assisted programs and activities. These steps involve reasonable efforts to include members of both sexes, various racial and ethnic groups, individuals with disabilities, and individuals in differing age groups.

Such efforts may include, but are not limited to the following.

**Strategy for Outreach and Recruitment:**

* Promote the recipients’ programs and/or activities in media, such as newspapers or radio programs, that specifically target various populations
* Send notices about openings in the recipients’ programs and/or activities to schools or community service groups that serve various populations
* Consult with appropriate community service groups about ways in which the recipient may improve its outreach and service to various populations
* Regularly communicate and build partnerships with community and faith based organizations and service providers

**Services to Meet the Needs of Specialized Populations:**

The HWS Board will use the following strategies, nationally recommended through the public comment process on Workforce Innovation and Opportunity Act (WIOA) Reauthorization legislation, to enhance services to specialized populations.

Dislocated Workers: American Job Center and WIOA Staff will participate in the rapid response efforts and provide information on employment and training services available to both the dislocated employee and the employer. Individuals seeking employment and/or training services shall be afforded core services, intensive services and training services as appropriate.

Displaced Homemakers: Individuals meeting the local area eligibility requirements for displaced homemaker will be provided core, intensive and training services as appropriate. These services may include initial and objective assessments, individual service strategies, job referral, classroom training, work experience activities, job development activities, individual case management and referral to other agencies/organizations for both supportive and other services not provided through the American Job Center.

Low Income Individuals: A wide array of employment and training services are available to individuals who meet the low income eligibility criteria. These services include the core, intensive and training services identified under the Workforce Innovation and Opportunity Act and the Wagner-Peyser Act. When program funds are limited, the HWS Board has established a priority of service to all low income individuals.

The Migrant Seasonal Farm Worker service organization (Proteus, Inc.) serves as a represented partner on the Board and a member of the American Job Center System. Efforts will continue to be made to partner with this organization to specifically target services to migrant and seasonal farm workers; however, services will not be provided exclusively through that organization. The ability to register through NEworks and receive job search assistance is available to all through the Center.

In providing services to low income individuals, the American Job Center will pursue active coordination and collaboration with other service organizations/agencies to ensure the needs of these clients are fully met.

Individuals training for non-traditional employment, veterans, and public assistance recipients: The HWS Board has established a priority of service to veterans in the Greater Omaha Area. Employment and training services provided under the Wagner-Peyser Act, WIOA, and other employment and training programs are also designed to provide individuals who are seeking non-traditional employment and individuals receiving public assistance, with sufficient assistance to enable such individuals to enter into self-sufficient employment.

**Individuals with multiple barriers to employment:**

Older individuals: The HWS Board will continue to enhance its relationship with its Title V partners in the area and utilize older workers in Work Experiences in various offices and roles as appropriate.

People with limited English-speaking proficiency (LEP) and translation services: As much as possible, services of staff that are bilingual will be used to assist clients directly. However, where this is not possible, HWS and the Service Provider will have access to translation services through Legal Language Services. This service assists with translating over 200 languages and dialects so that anyone seeking services through the American Job Center system will not be turned away due to limited English-speaking skills. Outreach documents for WIOA Adult, Dislocated Worker, and Youth services have been translated into Spanish and the Service Provider has developed an outreach plan that includes community involvement and development of partnerships with organizations that work with LEP populations. In the coming years, additional opportunities will be taken to translate more of the Center handouts and to provide signage to better assist LEP customers.

People with disabilities: The Board will integrate Vocational Rehabilitation programs into the system through collaborative partnerships. There has been and will continue to be increased investment in assistive technology and sign language interpreters to serve persons with disabilities.

People with criminal backgrounds: The Douglas County Commissioners have engaged a Re-entry Council to make recommendations regarding re-entry processes and supportive services. As these recommendations are developed, the HWS Board will work the council to further these initiatives.

**Accommodations and Assistive Technology**

The HWS Board relies upon individuals in need of reasonable accommodations, translation services or assistive technology to request such services. Information on how to make a request is posted on bulletin boards, advertisements and at the American Job Center and in all public notices.

To afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits of the Workforce Innovation and Opportunity Act (WIOA) Title I program or activity, the Local Area will furnish (at no cost to the individual) appropriate auxiliary aids or services where necessary. In determining what type of auxiliary aid or service is appropriate and necessary, the Local Area will give primary consideration to the requests of the individual with a disability. Primary consideration means honoring the choice unless the Local Area can demonstrate that another equally effective means of communication is available, or that using the means chosen would result in a fundamental alteration in the service, program, or activity, or undue financial and administrative burdens.

*j. Describe any innovative initiatives or service delivery strategies.*

 **One-Stop Operations Strategies**

* Dedicated Navigator staff (effective 7-1-11) to provide universal access and serve as a common entry and initial assessment point for all customers entering the American Job Center.
* Information sharing among partners through regular meetings and email. Research is being done to develop a common intake system that will be available to partners beyond WIOA and Wagner-Peyser.
* The sharing of community resources through a continuously updated web site available to all partner staff.
* Use of social media such as Facebook and LinkedIn to reach out to both business and job seeker customers.
* Development of basic computer skill training so that all customers may benefit from the virtual job searching models.

**Business Initiatives and Strategies**

* Private industry leadership of the One-Stop delivery system through the HWS Board
* The organization of an inter-agency business outreach team to collectively approach businesses and share business contacts.
* Sectorial employment and training partnership initiatives via participation in the National Workforce Fund Initiative. Examples ongoing initiatives can include:
* Development of career pathway training for the Healthcare Partnership
* Development of career pathway training for the Transportation, Distribution, and Logistics (TDL) Partnership
* Application for grants that will enhance technology to provide better services to businesses.

**Youth Strategies**

* Innovative youth service delivery focused on collaborative partnerships, career exploration and skills training for demand occupations.
* Partnership between Youth WIOA service delivery and programs that offer additional resources.

*k. Identify the case management system to include what the system will consist of and how it will be implemented.*

The primary mechanism for case management in the Greater Omaha Workforce Development Area is the NDOL NEworks and ECM computer system. This system went into effect in October 2010. In addition, the WIOA Service Provider uses an internal process to serve as a back-up system for client tracking and reporting. This system was developed by Goodwill Industries to be able to provide statistical information as needed for the management of the program. Its function is separate from the NEworks and ECM systems.

The WIOA staff members regularly maintain contact with each client to evaluate client progress, determine additional needs to complete employment and training activities, and to update other issues as appropriate. Case management notes of each contact are maintained in the NEworks system.

*l. Identify how the local area has implemented electronic case files on new enrollments since July 1, 2012.*

The WIOA staff are actively using the ECM system. Scanners are in place along with signature pads so that all new enrollment paperwork is done directly through ECM or scanned into the system.

*m. Identify One-Stop partners by organization and name of contact person for each Board certified comprehensive American Job Center. Describe examples of strategic partnering with required and optional American Job Center partners and other organizations to provide services.*

Listed below is the current partner and contact information for each partner that holds an active MOU with HWS and the American Job Center.

|  |  |  |
| --- | --- | --- |
| **Mandated Partner** | **Contact Person** | **Organization** |
| Title I WIOA – Adult and Dislocated Worker Programs | Justin Dougherty | Goodwill Industries |
| Title I WIOA – Youth Program | Justin Dougherty | Goodwill Industries |
| Adult Basic Education | Bill Owen | Metropolitan Community College |
| Community Service E & T | Evangeline Levison | Eastern Nebraska Community Action Partnership (ENCAP) |
| HUD Employment & Training Program | Clifford Scott | Omaha Housing Authority |
| Job Corps | Denny Knittle | Odle Management |
| Migrant and Seasonal Farmworkers | Susan Billups Rabick | Proteus, Inc. |
| Post-Secondary Vocational Education | Bill Owen | Metropolitan Community College |
| Senior Employment (Title V) | Muriel Duckett | Experience Works |
| Trade | Mike Eastman | Nebraska Department of Labor |
| TAA | Mike Eastman | Nebraska Department of Labor |
| Unemployment Insurance | Evan Littrell | Nebraska Department of Labor |
| Veteran’s Program | Mike Eastman | Nebraska Department of Labor |
| Wagner-Peyser Employment Services | Mike Eastman | Nebraska Department of Labor |
| Vocational Rehabilitation | Deb Dixon | Nebraska Vocational Rehabilitation |
| Vocational Rehabilitation | Nancy Flearl | Nebraska Commission for the Blind and Visually Impaired |
| WIA Native American Program | Cuba Dabney | Indian Center, Inc. |
| **Community Based Partner** | **Contact Person** | **Organization** |
| At-risk Youth and Young Adults | Jane Prine | Impact One Community Connections |
| Foster Care and Home Visitation Programs | Nick Juliano | Father Flanagan’s Boys Town |
| Offender Program | Gary Grayson | Grayson’s Nonprofit for Re-entry Services |
| Senior Employment (Title V) | Charles Garrett | Eastern Nebraska Office on Aging  |
| Transitioning Foster Care Youth | Sara Riffel | NCF—Project Everlast |

One Stop/American Job Center partners jointly participate in job/career fairs, specific marketing efforts, reception/information desk and resource responsibilities, and employer outreach and placement activities. Business Services staff from all partners meets regularly as a team to share employer contacts and streamline business outreach efforts and other partner representatives actively participate in the Workshop Functional Team to establish meaningful learning opportunities for customers.

*n. Identify an operating budget or cost allocation plan for each WDB certified comprehensive American Job Center including the amount and the type of funding of each American Job Center partner.*

The Partner contributions for operational costs of the American Job Center in the Greater Omaha Workforce Development Area are detailed in either the sub-lease and/or Memorandum of Understanding Attachment A to each MOU. The co-located Partner currently agrees to contribute a pro rata share of all allocated costs of the American Job Center based upon the percentage of occupied square footage of the Center occupied by the Partner. Costs for maintaining common areas (including but not limited to the reception area, resource room, hallway and restroom area, and common point of entry will be allocated among the co-located Partners in the same manner. The purchase, installation and maintenance of telephone and computer access meeting the specifications designated by the One Stop Operator is also provided to the co-located Partners. The HWS Board adheres to the guidance provided in the State policy “Cost Allocation and Resource Sharing for a One-Stop Delivery System.” It is understood that there will be changes under WIOA for developing infrastructure costs. These are being reviewed by the HWS Finance Officer and Finance Committee for a recommendation to the full Board.

MOUs and Attachment A’s are effective for two years. Copies of the MOUs and Attachment As are included in Attachment M.

*o. If there are any gaps where the amount of funding does not meet the workforce investment needs of businesses and jobseekers, describe the actions to be taken by the WDB to address these gaps.*

Efforts to address these gaps will be made by:

* Making better use of the employment and training resources available in the Local Area through collaboration and further integration of the partners
* Identifying additional grant opportunities to supplement existing resources
* Advocating for funding as part of the City of Omaha budget
* Encourage and support creative partnering initiatives that streamline services, eliminate duplication and maximize funding to jobseekers and employers.

*p. Identify whether or not the local area will be transferring funds between the adult and dislocated worker funding systems. If funds are to be transferred, indicate the reason for the transfer of funds.*

The HWS Board will take advantage of the WIOA allowance for transfers of up to 100% of funds between the Adult and Dislocated Worker programs to maximize the flexibility in serving the Adult population, as necessary, in compliance with State Policy. The purpose for this request would be to support the local area program needs when either program has insufficient funding. A fund transfer was completed in PY14. Although transfers are not currently planned for PY15-16, there is always a possibility that this activity may be needed.

* 1. **Memorandum of Understanding**

*A Memorandum of Understanding (MOU) shall be developed and signed between the WDB, with the agreement of the chief elected official, and the American Job Center partners relating to the operation of the One-Stop delivery system in the local area. A single “umbrella” Memorandum of Understanding may be developed that addresses the issues relating to the local One-Stop delivery system for the local board, chief elected official and all partners, or the local board may decide to enter into separate agreements between the local board, chief elected official, and one or more partners. A draft of the most current MOU between the local board, chief elected official, and each of the American Job Center partners must be submitted with the draft local plan, understanding that fully executed MOUs covering the time period of the plan must be included in the final plan.*

*The Memorandum of Understanding must contain the following:*

*a. A description of methods for referral of individuals between the American Job Center operator and the American Job Center partners, for the appropriate services and activities.*

*b. A description of the services and how these services will be provided through the One-Stop delivery system.*

*c. A description of the funding arrangements for services and operating costs of the One-Stop delivery system.*

*d. The duration of the memorandum and the procedures for amending the memorandum during the term of the memorandum.*

*The local plan must include documentation of the negotiations and efforts that took place in completing the Memorandums of Understanding. In addition, the local plan must also acknowledge the following provision:*

*In the event there is failure to execute an MOU between a local board and a required partner, the local board will report this to the Governor or Nebraska Workforce Development Board, and the State agency head responsible for administering the partner's program.*

*In turn, the Governor or the State Workforce Development Board and the responsible State agency, will then inform the U.S. Secretary of Labor, as well as, the head of any other federal agency with responsibility of oversight for a partner's program.*

*Any Memorandums of Understanding that have not successfully been executed at the time of final local plan submission must be identified in the plan and, if appropriate, a plan submitted for action to secure the MOU. In addition, any partner that fails to execute an MOU may not be permitted to serve on the local board. When a local board has failed to execute an MOU with all the required partners, the local area is not eligible for any portion of state incentive grants awarded on the basis of local coordination of activities. If appropriate, the plan should describe any formal or informal agreements that are in place, or that will be developed during the planning cycle.*

The HWS Board developed a Memorandum of Understanding (MOU) that reflects the mandated partner’s intent to participate in the local American Job Center system. In addition, the HWS Board developed an Attachment A to show cost allocation and services for each partner. The HWS Board set up a negotiation process to ensure that MOU negotiation processes occur within acceptable timeframes to maintain consistent compliance. Services identified will include core, intensive, and training services including activities designed to introduce youth to the labor market.

The following process is facilitated by the HWS Board staff in partnership with the One Stop Operator (for the American Job Center) and supported by the HWS Board and the Chief Elected Official.

1. Four months In advance of expiration
	* 1. Check partner’s current status with the One Stop Operator relevant to cost allocation, service delivery and referral processes related to the Career Center.
		2. Update the MOU’s Attachment A (Cost Allocation, Services and Referrals) as needed:
* Current rent, utilities, other fees, etc.
* Career Center’s current dedicated, resource room and common square footage
* Partner’s current share of dedicated, resource room and common square footage
* Partner’s staffing levels, schedules or other methods for delivering services at the Career Center
* Confirm the services provided by Partner, differentiating between core, intensive and training
* Confirm Partner referral processes with the Career Center
	+ 1. Using confirmed information, revise cost allocation, service delivery and referral processes on Attachment A as appropriate. Update MOU term and expiration information.
		2. Confirm all proposed changes with the One Stop Operator.
1. Three months In Advance Of Expiration
	1. Share proposed changes with Partner. Finalize negotiations, confirm changes and all information regarding MOU Partner signature.
2. One to two months In Advance Of Expiration
	1. Send MOU & Attachment A to Partner for signature.
	2. When Partner returns signed documents, the HWS Board staff sends the MOU and Attachment A to the HWS Board Chair for signature.
	3. The Chair signs and returns MOU documents to the HWS Board staff.
	4. HWS Board staff distributes MOU and Attachment A to the HWS Executive Director for signature.
	5. The HWS Executive Director will sign and return originals to the HWS Board staff.
	6. HWS Board staff forwards the MOU documents to the Chief Elected Official for signature. Chief Elected Official signs and returns MOU documents to the HWS Board staff.
	7. HWS Board staff makes copies for the MOU Partner and places the originals on file.

The Board is collaborating with the One Stop Operator to initiate all partner negotiations. The MOU and Attachment templates will be revised as necessary. The Board will comply with all Federal and State regulations that pertain to the MOU process of development and implementation.

In the event of failure to execute an MOU between the HWS Board and a required partner, the HWS Board will report such to:

* State Agency Head responsible for administering the required partner program
* State Workforce Investment Board
* Governor

In turn, the Governor, in partnership with the State Workforce Development Board (NWDB) and State Agency Head (NDOL) will inform the U.S. Secretary of Labor, as well as, the head of any other federal agency with responsibility for oversight for the required partner program failing to execute an MOU.

Any partner that fails to execute an MOU with the Local Area will not be permitted to serve on the HWS Board. In addition, any local Board that has failed to execute an MOU with all required partners is not eligible for state incentive grants awarded on the basis of local coordinated activities.

The HWS Board is excited about the possibility of additional MOUs and agreements to further workforce development in the Greater Omaha Workforce Investment Area. Partnering with other organizations on grant opportunities and the addition of new co-located partners at the American Job Center will lead to the development of new agreements. However, at this time, there are no specific plans in place for new MOUs or agreements.

* 1. **Fiscal Controls and Reporting**

*Each local plan must:*

*a. Identify the fiscal agent or entity responsible for the disbursal of grant funds.*

Heartland Workforce Solutions, Inc. assumed the Fiscal Agent duties effective October 1, 2011 for the Greater Omaha Workforce Investment Area.

*b. Describe the fiscal system and controls used by the fiscal agent for administering WIOA funds. Explain measure taken to ensure funds are expended in a timely fashion.*

The system provides federally required records and reports that are uniform in definition, accessible to authorized federal and state staff, are verifiable for monitoring, reporting, audit, program management and evaluation purposes, and are governed by procedures that are in accordance with generally accepted accounting principles (GAAP).

This Department’s financial system includes:

* Identification of sub-grant and contract awards
* Accurate, current and complete disclosure in financial reporting
* Records that identify authorizations, obligations, unobligated balances, assets, expenditures, income and interest supported by source documentation
* Effective internal controls to safeguard assets and assure their proper use
* Comparison of actual expenditures with budgeted amounts
* Written procedures for payment
* Written procedures to determine the allowability of costs

HWS began administering the fiscal accounting system of the Greater Omaha Workforce Investment Area effective 10-1-11 for both administrative and program funds. The accounting system encompasses all phases of accounting transactions, including identifying and classifying transactions through the proper recording and reporting of them.

This system, managed by HWS has three primary responsibilities:

* Prescribing the system of accounts and accounting used
* Developing necessary accounting policies and procedures
* Coordinating and approving financial systems

Within this broad framework, HWS provides accounting capabilities which meet federal requirements and yet are consistent with state practices to ensure compliance with prevailing laws and generally accepted accounting principles (GAAP).

All warrants (checks paid) flow through HWS for approval and redemption. The accounting system will not allow a warrant to be drawn unless sufficient cash exists within the agency’s funds,

To effectively manage cash flow, HWS Fiscal staff will analyze the cash needs for the accounting period to ensure efficient withdrawal of funds using NDOL’s RRS system. Items such as administrative salaries, rent, contract reimbursements, utilities, and other recurring expenditures are known in sufficient time to develop reasonably accurate schedules for requesting cash. When funds are needed to cover other expenditures that are less predictable, the withdrawal of funds is scheduled to coincide as closely as possible with regular requests for routine recurring expenditures.

Schedules have been developed to prevent the unnecessary and undesirable practice of having a large cash balance of funds over extended periods of time. The primary objective is that the Fiscal Unit has only as much cash on hand as is needed.

The local area has developed a Client Account Ledger and procedure to assist with the tracking of client expenditures and obligations. This system allows WIOA Career Specialists and Administrative staff to plan “obligations” for clients and track remaining funds, thereby ensuring that we know the amount of funds still available to be committed and to ensure funds are expended in timely fashion. In addition, the Service Provider and HWS will work together to enter and approve (respectively) obligations into the NDOL RRS system for obligation tracking.

*c. Describe the competitive and noncompetitive processes that will be used by the local area to award grants and contracts for activities under Title I of WIOA including how potential bidders are being made aware of grants and contracts.*

The Greater Omaha Workforce Development Area will follow appropriate state and federal procurement standards (Workforce Innovation and Opportunity Act of 2014, OMB Uniform Guidance (2 CFR part 200) (2 CFR part 2900), and final rule (20 CFR Part 40-48)) to solicit proposals, bids, and applications for an award of all grants and contracts which are developed to procure services or activities determined as allowable under federal rule. A review of the federal procurement standards will be conducted prior to the award of any grant or contract to ensure that the local standards meet federal and state requirements. The HWS Board will utilize the Request for Proposal (RFP), the Invitation for Bid (IFB), or an application process to select such providers. The HWS Board may utilize the non-competitive process for awards under $20,000 but will adhere to appropriate procurement standards when this process is used.

The HWS Board reserves the right to select the respondent who delivers services that are cost effective, efficient, and best meet the needs of the request. Lowest cost shall not be the sole criteria for the final selection.

*d. Describe the procurement process for purchasing goods and services in the local area.*

The HWS Board will follow the procedures outlined in the Procurement Policy (Attachment BB) to procure equipment, supplies and other services (with the exception of the services identified above). These standards ensure fiscal accountability and prevent waste, fraud, and abuse in programs identified in the Workforce Investment Act and its implementing rules and regulations. All policies and procedures are available for public review at the HWS administrative office located at 5752 Ames Avenue, Omaha, NE 68104. Documentation of the processes followed is retained at the office for annual review by the City or State Program Monitor(s), auditors, or Federal reviewers.

The HWS Board will ensure that all sub-recipients who receive grant funds shall have in place procurement standards which meet or exceed their standards or agree to abide by the State provisions when grant funds are used to procure equipment or services.

If local standards are in effect, they shall be in writing and must include at a minimum, the following elements:

* Authority to take procurement actions
* Standards of Conduct
* Procurement methods that include a solicitation and selection process that maximizes free and open competition
* Documentation requirements

Sub-recipient procurements in excess of five thousand dollars ($5,000), or in the aggregate, must be reviewed and approved by the Executive Committee or the full HWS Board. Documentation of any changes to the policy will be recorded in Board or Executive Committee minutes.

*e. Identify (if applicable) the process to be used to procure training services that are made as exceptions to the Individual Training Account process.*

Training services not provided through the Individual Training Account process will be delivered by training providers selected and approved by HWS Inc. The procurement process shall comply with the HWS and Douglas County procurement standards and other training providers will be selected through an open and competitive selection process. This is based on the basic tenet of the standards found in 29 CFR 95.42, which states that an open and competitive process avoids even the appearance of a conflict of interest (either individually or organizationally).

*f. Identify what system will be used to collect data, track and report local performance measures and program activity.*

The statewide NEworks system and the Nebraska Department of Labor, Labor Market Information Division, will provide the system/mechanism to report local performance measures and Workforce Innovation and Opportunity Act program activity. The system will allow the HWS Board to evaluate local performance and program accomplishments against the negotiated values of the federal performance standards. The NDOL RRS system will be used for financial requests and for obligation tracking. In addition, the HWS Board will utilize information collected by the NEworks to evaluate performance and program issues and information obtained through a common client intake and case management and tracking system which will be used by the One Stop Operator and alternate entities where clients enter the program and receive services.

*g. Describe the fiscal agent's property management system.*

The Greater Omaha Workforce Development Area will utilize a Property Management System developed by HWS. This system provides guidelines regarding the purchase, maintenance, inventory and disposal of equipment purchased with WIA/WIOA funds. HWS will conduct an annual physical inventory of all WIA/WIOA funded non-expendable and small and attractive property. All policies and procedures are available for public review at the HWS administrative office located at 5752 Ames Avenue, Omaha, NE 68104. Documentation of process is retained at the office for annual review by the City and/or State Program Monitor, auditors, and Federal reviewers.

*h. Describe system/mechanism that will be included for consumer reports.*

The Greater Omaha Workforce Development Area will utilize the NDOL consumer reports system (as noted below) which is designed to assist clients in selecting educational or training institutions in order to make educational or career choices toward achieving economic security and financial independence.

HWS and the One Stop Operator and Service Provider will continue to use the Nebraska Department of Labor’s collection of resources, including NEworks, H3.ne.gov, and TrainingLink. Together, these resources form a system that provides information such as:

* Location of education or training providers by school type, city, and region
* Description of a specific course of study
* A list of schools offering a specific course of study
* Comparison reports between institutions in a specific course of study
* Average 3 month wages for graduates working in the state.
* Occupational wage comparisons
* Career and job information

For clients interested in vocational or technical training, the system also provides current employment prospects, current wage level for completers of the program and the most recent information on the performance of institutions providing training in the Workforce Investment Area.

*i. Acknowledge the requirement of submitting an annual report to the Nebraska Workforce Development Board after the end of each program year, as requested. The report shall include, but is not limited to information on: number of customers,* *(individuals and businesses) receiving services through the One-Stop system; office locations and certification status of Career Centers; recognitions and awards; successes; evaluations and continuous improvement efforts; impact of waivers, and web sites.*

The HWS Board will submit an annual report to the Nebraska Workforce Development Board after the end of each program year. The report shall include, but is not limited to information on: number of customers (individuals and businesses) receiving services through the One-Stop system; office locations and certification status of Career Centers; recognitions and awards; successes; evaluations and continuous improvement efforts; and web sites.

*j. Describe the actions to be taken to ensure the salary and bonus limitation is not exceeded.*

The Greater Omaha Workforce Development Area will utilize the State’s Salary and Bonus Limitations policy which states the limitation on salaries and bonuses applies to funds appropriated in Fiscal Year 2006 on or after June 15, 2006 under Public Law 109-149 or prior Acts under the heading “Employment and Training Administration.” Such funds will not be used by a recipient or sub recipient to pay the salary and bonuses of an individual, whether as direct costs or indirect costs, at a rate in excess of Executive Level II, except as provided for under section 101 of Public Law 109-149. According to the law, this limitation does not apply to vendors as defined in OMB Circular A-133.

* 1. **Oversight Plan**

*“The local board, in partnership with the chief elected official, shall conduct oversight with respect to local programs of youth activities authorized under section 129, local employment and training activities authorized under section 134, and the one-stop delivery system in the local area.” [Sec. 117(d)(4)]*

* 1. *Identify the plan for conducting monitoring of sub-recipients.*

Each recipient of a grant award involving WIOA funds from the HWS Board will be subject to a compliance review of their fiscal and administrative systems by the Nebraska Department of Labor Program Monitor. The compliance review shall insure:

Fiscal Systems

* Expenditures have been made against appropriate cost categories and within the cost limitations specified by the WIOA.
* The system meets the standards of Generally Accepted Accounting Principles (GAAP)
* The system provides records and reports that are uniform in definition, accessible to federal, state, and the HWS Board members or staff and are verifiable for monitoring, audit, program management, and evaluation purposes.
* Program costs are reasonable, allowable, and necessary to achieve program goals and are in accordance with applicable cost principles
* Internal controls are in effect to safeguard assets and prevent fraud and abuse of funds
* A system is in place to compare actual expenditures with budgeted amounts
* There is adequate documentation to support accounting records
* Procurement activities are conducted in accordance with federal, state and local procurement standards

Program Activities

* Only those activities and services identified by the WIOA, its implementing regulations and the Memorandum of Understanding are being provided
* A system is in place to determine client eligibility and no ineligible clients are being enrolled into the programs
* Client data is entered into the participant data system (NEworks) in an accurate and timely manner
* Effective coordination is taking place between the Service Provider, One Stop Operator, and One Stop Partners.
* The Service Provider has demonstrated substantial compliance with the provisions of the WIOA, its implementing regulations and the Greater Omaha policies and procedures

The State Program Monitor will provide a standard monitoring report to the HWS Board through the Board Chair and HWS staff. All findings associated with each monitoring report will require corrective action and potential progress reports to the State Program Monitor until the corrective action has been fully implemented.

In addition, the HWS Board has established an oversight plan for the Adult, Dislocated Worker and Youth WIOA programs. The oversight plan includes monthly, quarterly, and annual oversight activities performed by the Board Operations staff and the HWS Board Performance Committee, Program Director, and Youth Council. The oversight activities include budget and program statistics reports, performance projections, file reviews, and participation in Service Provider staff meetings. The full oversight plan is detailed in Attachment Z to this plan.

Lastly, the HWS Board will use the State’s quarterly WIOA Performance reports and other information generated by NEworks to document official Service Provider performance.

* 1. *Address how the Local WDB shall be engaged in oversight activities.*

As described above and in detail in the HWS Board Oversight Plan, the Performance Committee, in conjunction with the HWS Program Director and Youth Council are responsible for the oversight of WIOA Title I monitoring activities.

The Performance Committee, HWS Program Director, and Youth Council will have the authority to monitor all recipients of Workforce Innovation and Opportunity Act funds awarded by the HWS Board. The Committee, Board staff, and Council may examine records (including making certified copies of such records), question employees, interview clients who are receiving assistance under the WIOA program, and enter any premise or site in which any part of a program or activity of a recipient is conducted or records of the recipient are kept.

The HWS Finance Committee and HWS Board will review the budget status for all WIOA programs, including current obligations and expenditures, status of enrollments and most recent quarterly performance results. The Service Provider will be present at each meeting, as requested, to present on these items as needed and answer any questions posed by the Board members, Executive Director, or public.

In addition, the HWS Board will fully implement its Performance Oversight Plan (Attachment Z). This plan states that the HWS Board staff will review client files at a minimum on a quarterly basis, searching for compliance with eligibility, employment strategy implementation, and fiscal regulations. This will be done for the Adult, Dislocated Worker, In-School Youth and Out-of-School youth files. The HWS Director of Operations will be primarily responsible for completing the files for review. Findings will be shared with the Service Provider. Depending on the severity or frequency of the findings, corrective action may be required. (All policies and procedures are available for public review at the HWS Administrative office located at 5752 Ames Avenue, Omaha, NE 68104. Documentation of the reviews are retained at the office for annual review by city and state monitors, auditors, and/or federal reviewers.

* 1. *Describe evaluation tools used to assess effectiveness of services to customers and ensure continuous improvement of the One-Stop delivery system.*

The One Stop Operator through the American Job Center uses written customer satisfaction survey results on a monthly basis to determine the effectiveness of services to customers and areas for improvement. These surveys are provided to customers throughout the American Job Center Resource Area and by individual partners who are co-located there. These are collected by the One Stop Operator for review. The American Job Center Manager follows up with any customers requesting contact and with those who indicate dissatisfaction with services (if contact information is provided). The results are compiled on a monthly basis and provided to the Performance Committee, Board, Executive Committee, and made available for public viewing. In addition, a quarterly interest survey is completed by the American Job Center customers to help determine additional program and service needs. The One Stop Operator summarizes the information for presentation to the functional teams at the Center as well as to the HWS Board.

1. **OPERATIONAL SECTION**
	1. **Services**
	2. Eligibility Definitions

*Describe in this section the definition and criteria established by the local board in order to deliver services funded under Title I of WIOA for a - k. Include local policy and/or local operational procedures.*

*a. Eligibility for adult services. Priority system for providing adult intensive and training services based on funding limitations. Include discussion of veterans’ priority provisions. As discussed in TEN 15-10, address how the local Workforce Investment Board has put into operation a veterans’ priority of service policy in a way that provides veterans and eligible spouses with the full range of employment and training services in a manner that is comprehensive, customer-driven, and seamless.*

Each adult who receives services funded under Title I of the Act must be registered in the NEworks System and meet the following eligibility requirements:

* A resident of Douglas, Sarpy or Washington County (at the time of participation, unless otherwise approved by the HWS Board Staff)
* Age 18 or older
* Authorized to work in the United States
* Registered under the Military Selective Act, if appropriate.

 \* Generally, there are no special eligibility requirements for participation by adults in career services under WIOA section 134(c)(2). However, if the career services provided include services under WIOA section 134(c)(2)(A)(xii) (number 13 on the previous list), priority must be given to recipients of public assistance, other low-income individuals (as defined by NDOL Preliminary Policy on Eligibility for Adult Programs), and individuals who are basic skills deficient.

**Veteran Priority of Service:** The HWS Board has established the following priority of service for veterans for the adult program. For the purposes of priority of service the following definitions apply:

* *Veteran - an individual who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable, as specified in 38 U.S.C. 101 (2). Active service includes full-time duty in the National Guard or a Reserve component, under orders during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge.*
* *Eligible Military Spouse – the spouse of any of the following:*
* *Any veteran who died of a service-connected disability;*
* *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 listed for a total of more than 90 days: (I) missing in action, (II) captured in the line of duty by a hostile force, or (III) forcibly detained or interned in line of duty by a foreign government or power;*
* *Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; and*
* *Any veteran who died while a disability, as indicated in paragraph 3 (above), was in existence.*

***Adult Program priority of service:*** *The HWS Board desires that at least 65% percent of Adults enrolled in intensive and training services must be recipients of public assistance or meet low income standards as established by the state. In addition, the following priorities apply to the adult program. The priorities are in a ranked system, with the top priority going to the first population listed, the next level of priority going to the second population listed and so on.*

*1) Veterans who are recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all other criteria for adult eligibility).*

*2) Military Spouses who are recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all other criteria for adult eligibility)*

*3) Non-Veterans who are recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all criteria for adult eligibility)*

*4) Veterans who are NOT recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all other criteria for adult eligibility)*

*5) Military Spouses who are NOT recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all other criteria for adult eligibility)*

*6) Non-Veterans who are NOT recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all criteria for adult eligibility)*

*b. Eligibility for dislocated worker services.*

Each dislocated worker (DLW) who receives services funded under the Workforce Investment Act must be registered in the NEworks System and meet the following eligibility requirements:

* Authorized to work in the United States
* A resident of Douglas, Sarpy or Washington County in Nebraska as of their participation date (documentation must be within 90 days of participation date). Exceptions may be made only with the approval of HWS designated staff.
* Registered under the Military Selective Service Act, if appropriate
* Individuals who have entered into other employment since a termination or layoff are considered eligible if the employment is less than one continuous year, and the individual is earning seventy-five percent or less of the wage paid at the time of termination or layoff. Employment over one continuous year shall be considered an occupational change.

DLWs shall not be considered eligible for services with the same employer or in the same occupation without showing a need for skill upgrading.

A DLW must also meet at least one of the following criteria:

Part I

* + - 1. Has been terminated or laid off, or who has received a notice of termination or layoff, from employment;

a. is eligible for or has exhausted entitlement to unemployment compensation; or

b. has been employed for a duration sufficient to demonstrate, to the appropriate entity at a one-stop center referred to in section 121(e), attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a State unemployment compensation law; and

* + - 1. is unlikely to return to a previous industry or occupation;

Part II

1. Has been terminated or laid off, or has received a notice of termination or layoff from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise;

2. is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or

3. for purposes of eligibility to receive services other than training services described in section 134(c)(3), career services described in section 134(c)(2)(A)(xii), or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close.

Part III

1. Was previously self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides, or because of natural disasters;

Part IV

1. Is a displaced homemaker;

Displaced Homemaker – WIOA section 3(16) defines “displaced homemaker” as an individual who has been providing unpaid services to family members in the home and who:

* Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment; and either
	+ Has been dependent on the income of another family member but is no longer supported by that income; or
	+ Is the dependent spouse of a member of the Armed Forces on active duty1 and whose family income is significantly reduced because of
		- A deployment;
		- A call or order to active duty pursuant to a provision of law referred to in section 101(a)(13)(B) of title 10, United States Code;
		- A permanent change of station; or
		- The service-connected death or disability of the member

Part V

1. Is the spouse of a member of the Armed Forces on active duty and who has experiences a loss of employment as a direct result of relocation to accommodate a permanent change in duty state of such member; or

2. Is the spouse of a member of the Armed Forces on active duty and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

**DLW Program Priority of Service:** Veterans’ priority of service as documented under the Adult program section of the plan also applies to DLWs.

In determining DLW eligibility, the term “terminated” would apply to a Veteran who is being honorably discharged either voluntarily or involuntarily.

*c. Eligibility for youth services. Priority system for providing services to youth including narrative on how the local area shall invest in youth who are most at-risk and in need. Shall services be offered to area youth who are not eligible under the youth program through the American Job Centers? If so, what funding will pay for these One-Stop services for non-eligible youth?*

Each youth who receives services funded under the Workforce Innovation and Opportunity Act (WIOA) must be registered in NEworks and meet the following eligibility requirements:

* Ages 14 – 21 for In-School Youth and 16-24 for Out-of-School Youth
* Authorized to work in the United States
* A resident of Douglas, Sarpy or Washington County (at the time of participation, unless otherwise approved by the HWS Board Staff)
* Registered under the Military Selective Act, if appropriate.

Additional qualifications apply to youth for receipt of services. These are outlined in the NDOL Preliminary Policy on Eligibility for Youth Programs.

In addition, the HWS Board eligibility criteria state that at least 95% percent of youth enrolled in services and qualifying by income, must be recipients of public assistance or meet low income standards as established by the state and face at least one of the following barriers:

* Basic skills deficient
* School dropout
* Homeless, runaway, or foster child
* Pregnant or parenting
* Offender
* Requires additional assistance to complete an educational program or to secure and hold employment

Priority will be given to low-income youth, and a 5% non-priority window is established for individuals who do not meet the low income standard but do face at least one serious barrier to employment (see definition of serious barrier to employment below). Youth that meet the low income criteria and have multiple serious barriers to employment will receive priority over youth who meet the low income criteria and only have one serious barrier to employment.

Priority will also be given to any youth who qualifies as a veteran and or eligible military spouse. Veterans’ Priority of Service as documented under the Adult program section of the plan will also apply to qualified Youth following the same ranking priority provisions that apply to Adult veteran participants.

The HWS Board embraces the Employment and Training Administration’s New Strategic Vision for the Delivery of Youth Services under WIOA and therefore will give priority to serving out-of-school youth who are high school drop outs, runaway and homeless youth, youth in foster care, court involved youth, children of incarcerated parents and migrant youth. In addition, the HWS Board supports that at least 75% of all youth funds shall be expended on out of school youth. The reasoning behind this decision is that out of school youth do not have the same access to resources as do in-school youth. However, the need to provide service to in-school youth is also important to help ensure success in secondary school that will lead to further training, education, and employment. Therefore, this population will continue to be served in the local area.

Area youth who are not eligible for Title I WIOA services will be referred to a community agency for appropriate services. Examples of such agencies include the Eastern Nebraska Community Action Program (ENCAP), Urban League of Nebraska, Project Everlast, Impact One Community Connections, the Hope Center for Kids, Public School System, and Youth Emergency Services.

*d. Eligibility – Verification of Lawful Presence.*

The HWS Board through the Service Provider will have each applicant for WIOA services attest that he or she is a U.S. citizen or a qualified alien using the Citizenship Attestation Form. If the applicant indicates he/she is not a U.S. citizen, the Service Provider will submit appropriate documentation to the HWS Board staff for processing through the SAVE (Systematic Alien Verification for Entitlements) program operated by the U.S. Department of Homeland Security. Coordination of the submission will be done through the City of Omaha.

*e. Definition of "face serious barriers to employment."*

* Basic skills deficient
* School dropout
* Homeless, runaway or foster child
* Pregnant or single parent
* Offender
* Individual with a disability
* Homeless
* Military Veteran
* Substance abuse
* Unable to obtain or maintain employment during the last 12 months
* Requires English as a Second Language to function on the job
* Requires additional assistance to complete an educational program or to secure and hold employment

*f. Definition of "deficient in basic literacy skills."*

Computes or solves problems, reads, or writes at or below the 8th grade level, as determined by a norm or criterion referenced assessment tool, and/or is unable to compute or solve problems, read, write, or speak English at the level necessary to function on the job, in the individual’s family or in society.

*g. Definition of "requires additional assistance to complete an educational program or to secure and hold employment."*

* Requires remedial training to obtain GED.
* Requires English as a Second Language to enable the individual to read, write, and speak English that is necessary to function on the job, in the individual’s family, and in society.
* Youth with a disability, including a learning disability
* Deficient in pre-employment or work maturity skills.
* Unable to obtain or maintain employment during the last 12 months.
* History of substance abuse by parent or client
* Are one or more grade levels below the grade level appropriate to the individual’s age
* Have been identified as unlikely to graduate due to lack of school credits
* Eligible to receive free or reduced price lunch
* Enrolled in an alternative education program
* Native American Youth
* Requires intensive “case management.” Use of ‘intensive case management’ in determining client eligibility requires administrative approval. Intensive case management includes, but is not limited to:

1. Lack of family stability resulting from a nighttime residence that is not with an immediate family member

2. Death of a parent

3. Incarceration of a parent

4. Victim of domestic violence/sexual or child abuse

5. Enrolled in an alternative education program

6. Lacking significant or positive work history

7. Major illness of a parent

8. Gang involved/affiliated/affected

9. Identified mental health issues

10. Lacking affordable housing

11. Migrant family member

*h. Criteria used to determine "in need of training services."*

Participants are determined to be in need of training services if they meet any one of the following conditions:

* Minimal or no work history
* Actively seeking work and unable to obtain or maintain employment during the past 60 days or more
* Individual assessment indicates need for training, retraining and/or skill upgrade in order to gain self-sufficient employment
* Deficient in basic skills
* Limited English that limits an individual’s employment opportunities

*i. Criteria to demonstrate “skills and qualifications to successfully complete the selected training program."*

An individual is considered to have skills and qualifications to successfully complete the selected training program when the following criteria are met.

* Meets all program eligibility criteria
* Skill assessments establish a functioning level sufficient to pursue desired employment goals with the assistance of WIOA and American Job Center services
* Other assessments that establish the individual is able to sustain an acceptable standard of living for themselves and dependents with the assistance of WIOA and American Job Center services

Any identified participation barriers (such as transportation, child care, substance abuse etc.) that would interfere or prevent reliable and predictable attendance and cannot be addressed satisfactorily with WIOA and One Stop American Job Center services must be satisfactorily resolved before enrollment.

*j. Criteria to demonstrate local occupational demand (or demand in another area to which the individual is willing to relocate) related to the program of training services.*

Training services for Adult, Dislocated Worker (DLW), and Youth in the Greater Omaha Workforce Development Area during the program year shall be for H3 occupations (defined as high demand, high wage, and high skill and are identified on the NELearn website), apprenticeships and other occupations qualifying as in-demand. Individuals must select a program that is directly linked to employment opportunities either in the local area or in an area to which the individual is willing to relocate.

In addition, under WIOA, at least 20% of the Youth funds will be used for work-based learning activities. These include work experience, internships, pre-apprenticeships, apprenticeships, and on-the-job training. Although the Act allows for the 20% to include staff salaries and not just the direct payments to participants and employers, the Greater Omaha WDB requires that the 20% be used specifically for the work-based learning activities that benefit the youth. Therefore, staff salaries will not be included in the calculation for local area purposes.

Furthermore, the HWS Board will utilize national, regional and local labor market information, board member input, data from labor and business organizations such as Chamber of Commerce and Economic Development and historical data referencing WIA client enrollments in eligible training provider programs to systematically align training opportunities with real job opportunities in the local area for all training. Priority will be given to local area sectors/industries that have high potential for sustained demand, growth and job seeker earning potential to meet or exceed the Nebraska self-sufficiency standards.

The Service Provider will use the Demand Occupation Determination form to demonstrate that a participant’s employment goal was determined in relation to a demand occupation (H3 = high wage, high skill, high demand), an apprenticeship, or other qualified in-demand occupation as defined by the Act and NDOL policy.

*k. How efforts to obtain financial assistance from other sources to pay the costs of training are going to be documented and coordinated including Pell Grants.*

The HWS Board authorizes WIOA funds to be expended on participants who are unable to obtain funds from other sources to pay the costs of their training or who require funding assistance beyond that available to them from other sources to pay for such training.

The HWS Board will ensure that the Service Provider and training providers establish linkages and funding arrangements with One Stop partners and other entities that consider the availability of Pell Grants and other funding sources so that WIOA funds may supplement these sources of training grants. Staff tools and forms are available to assist WIOA staff in coordinating and tracking the financial assistance opportunities available to WIOA clients, including Pell Grants. This information is tracked on the participant’s Individual Employment Plan (or Individual Service Strategy in the case of a Youth) and in case notes. Relationships are developed with local institutions’ financial aid offices and with agencies such as Education Quest Foundation to assist clients with accessing possible funds that may be available for financial assistance.

The HWS Board also ensures that WIOA Service Provider staff members actively assist participants in learning about other financial assistance. The American Job Center will make financial aid offices and institutions’ contact information readily available to clients via electronic means and by informational fliers and cards, when available. In participant case files, staff will document assisting WIOA participants with information on financial aid, accessing informational websites and contacting financial aid offices.

In instances where a participant is enrolled in a training program funded by the WIOA and is awaiting approval of a Pell Grant, the Service Provider shall make arrangements with the training provider and the participant regarding the allocation of the Pell Grant and other financial assistance programs.

Financial assistance is recognized as a public or private grant or scholarship. Loans of any form are not considered financial assistance for the purposes of the procedures described above.

* 1. Adults and Dislocated Workers

A. Career Services

*1) Describe in detail the type and availability of core services and how they will be provided to all adults and dislocated workers under WIA funding. Include coordination with Wagner-Peyser activities. Include discussion of how career guidance is provided.*

The HWS Board considers career services to be the initial step in providing clients with workforce activities that will lead to unsubsidized employment. The commitment to the principle of providing job seekers with career assistance, including job searching and career pathways, is evident in the method of delivery for career services.

Career services shall be available to youth, adults and dislocated workers through the One Stop delivery system which may be provided directly through the One Stop Operator(s) or through contracts with service providers which may include public, private for profit, and private non- profit organizations approved by the HWS Board. Staff funded partly or in-whole by Wagner-Peyser funds are co-located in the American Job Center, and the HWS Board will work with Wagner-Peyser funded activities offered by the Nebraska Department of Labor Employment Service for the delivery of career services.

Each client must be registered in the NEworks system to receive a career service, other than self- service or informational activities. Activities under career services include:

|  |  |
| --- | --- |
| **Basic Service** | **Definition** |
| Eligibility Determination | Determination of whether the individual is eligible to receive assistance under one or more partner programs. |
| Intake, Outreach | Outreach, intake (which may include worker profiling), and orientation to the information and other services available through the one-stop delivery system |
| Initial Assessment | A preliminary evaluation of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities (including skills gaps), and supportive service needs. |
| Labor Exchange Services | Services to the customer that lead to:a. Job search and placement assistance and, in appropriate cases, career counseling, including—  i. Provision of information on in-demand industry sectors and occupations; and  ii. Provision of information on nontraditional employment and b. Appropriate recruitment and other business services on behalf of employers, including small employers, in the local area, which services may include services described in this subsection, such as providing information and referral to specialized business services not traditionally offered through the one-stop delivery system. |
| Referrals | Provision of referrals to and coordination of activities with other programs and services, including programs and services within the one-stop delivery system and, in appropriate cases, other workforce development programs |
| Labor Market InformationDelivery | Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including— a. Job vacancy listings in such labor market areas; b. Information on job skills necessary to obtain the jobs described in (a); and c. Information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for such occupations |
| Eligible Training ProviderInformation Accessed | Provision of performance information and program cost information on eligible providers of training services as described in Section 122, provided by program, and eligible providers of youth activities described in Section 123, providers of adult education described in Title II, providers of postsecondary vocational education activities and vocational education activities available to school dropouts under the Carl D. Perkins Vocational and Applied Technology Education Act , and providers of vocational rehabilitation program activities described in Title I of the Rehabilitation Act of 1973. |
| Local Area PerformanceInformation Provided | Provision of information, in formats that are usable by and understandable to one-stop customers regarding how the local area is performing on the local performance accountability measures and any additional performance information with respect to the one-stop delivery system in the local area. |
| Supportive ServicesInformation Provided | Provision of information, in formats that are usable by and understandable to one-stop center customers, relating to the availability of supportive services or assistance, including: a. Childcare, child support, medical or child health assistance under title XIX or XXI of the Social Security Act (42 U.S.C. 1396 et seq. and 1397aa et seq.); b. Benefits under the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.); c. Assistance through the earned income tax credit under section 32 of the Internal Revenue Code of 1986 d. Assistance under a State program for temporary assistance for needy families funded under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.); and e. Other supportive services and transportation provided through funds made available under such part, available in the local area;Referral to the services or assistance described above as appropriate. |
| Unemployment CompensationClaim Filing InformationProvided | Provision of information and assistance regarding filing claims for unemployment compensation. |
| Assistance in Getting FinancialAssistance beyond PartnerPrograms | Assistance in establishing eligibility for programs of financial aid assistance for training and education programs that are not funded under WIOA. |
| Services to assist in obtaining or retaining employment | Services, if determined to be appropriate in order for an individual to obtain or retain employment, that consist of— a. Comprehensive and specialized assessments of the skill levels and service needs, which may include:  i. Diagnostic testing and use of other assessment tools; and  ii. In-depth interview and evaluation to identify employment barriers and appropriate employment goals; b. 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; c. Group counseling; d. Individual counseling; e. Career planning f. Short-term prevocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct; g. Internships and work experiences that are linked to careers; h. Workforce preparation activities; i. Financial literacy services j. Out-of-area job search assistance and relocation assistance; or k. English language acquisition and integrated education and training programs |
| Follow-Up Services | Follow-up services, including counseling regarding the workplace, for participants in workforce investment activities who are placed in unsubsidized employment for not less than 12 months after the first day of employment, as appropriate.  |

Generally, there are no special eligibility requirements for participation by adults in career services under WIOA section 134(c)(2). However, if the career services provided include services under WIOA section 134(c)(2)(A)(xii) (number 13 on the previous list), priority must be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. The local board and the Governor will direct the one-stop operators in the local area with regard to making determinations related to such priority per WIOA section 134(c)(3)(E). At this time, the local board has not established a priority. Decisions regarding this will come through the strategic planning process for implementation in PY16.

Career guidance is available in several formats within the Resource Area of the American Job Center. Information related to various careers is displayed publicly and available through on-line systems. Staff and partners are available to meet with clients on an appointment basis for more in-depth discussions regarding career exploration options and tools.

*2) Explain if the WDB will provide career services based on community need and/or state criteria.*

The HWS Board does not contemplate delivering career services directly. These activities shall be provided through the American Job Center system by the One Stop Operator, One Stop Partners, or contractual service providers. RFPs for services will be posted in PY15.

*3) Describe the process used in selecting the service providers under a contract for services. The process must include a public comment period of at least 30 days for interested providers.*

The HWS Board will utilize the RFP process to identify, select and designate service providers for the WIOA Adult, DLW, and Youth programs as well as the One Stop Operator, under a contract for services. The application process will comply with the requirements of the Workforce Innovation and Opportunity Act, State policy, and the HWS and City of Omaha procurement policies.

B. Training Services

*1) Describe in detail the type and availability of training services and how they will be provided to adults and dislocated workers who meet eligibility requirements.*

*Training services shall be available to eligible adults and dislocated workers through the One Stop delivery system which may be provided directly through the One Stop operator(s) or through contracts with service providers which may include public, private for profit, and private non- profit organizations approved by the HWS Board or via Board approved eligible training providers.*

*The HWS Board will provide the following training services:*

|  |  |
| --- | --- |
| **Training Services** | **Service Description** |
| Customized Training | Training that is designed to meet the special requirements of an employer (or group of employers) that are conducted with a commitment by the employer to employ the individual on successful completion of the training. The employer pays for not less than 50% of the cost of the training. (This training does not have to be with a training entity from the ETP list.) |
| Adult Education/BasicSkills/Literacy Training | Adult education and literacy activities (remedial classroom training, English as a second Language, GED) normally conducted in an institutional setting and designed to upgrade basic skills and prepare the individual for further training, future employment, or retention in present employment, provided concurrently or in combination with any of the other services in this list.  |
| Entrepreneurial Training | Training designed to provide customers with the skills to start businesses of their own. |
| Job Readiness | Activities that help an individual become familiar with general workplace expectations and learn behaviors and attitudes necessary for employment in combination with the other services in this list. |
| Occupational SkillsTraining | Instruction conducted in an institutional setting (Classroom Training) designed to provide or upgrade individuals with technical skills and information required to perform a specific job or group of jobs, including non-traditional jobs. |
| On the Job Training | Training by an employer that is provided to a paid participant while engaged in productive work in a job that provides knowledge or skills essential to the full and adequate performance of the job. Provides reimbursement to the employer of up to 75% of the wage rate (based on size of the employer) of the participant for the extraordinary costs of providing the training and additional supervision related to the training. It is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant. (This training does not have to be with a training entity from the ETP list.) |
| Private Sector Training | Formal training programs conducted or sponsored by private business or organized labor. It may include apprenticeship training programs and specialized programs on specific machines or in the application of specific computer programs presented by the manufacturers of such machines or programs. |
| Skill Upgrading andRetraining | Training designed to enhance the skills of currently employed customers who are working at less than their skill potential and have minimal or no advancement opportunities and who require upgrade training to increase earnings potential and move then to self-sufficiency. |
| Workplace Training with Related Instruction | Programs that combine workplace training with related instruction, operated either concurrently or sequentially, which may include cooperative education programs.  |
| Incumbent Worker Training | Up to 20% of WIOA funds may be used to pay the program cost of training for incumbent workers to assist them in obtaining the skills necessary to retain employment or avert layoffs. |
| Transitional Jobs | Work based learning to assist special population groups such as those with disabilities or in foster care, to transition to unsubsidized employment. |

These training services may be made available to employed and unemployed adults and dislocated workers who have met the eligibility requirements for training services.

All occupational skills training services will be delivered through approved eligible and accredited training providers. Eligible Training Providers and their approved program information are available on TrainingLink, located on the internet at [www.dol.nebraska.gov](http://www.dol.nebraska.gov). Eligible training providers, who meet the eligibility criteria and are selected and accredited through the HWS Board’s Performance Committee, shall provide training services.

*a. Discuss implementation of the fifty percent requirement for initiating adult and dislocated workers into training for a high-demand, high wage and high skill occupation.*

*b. Explain how WIOA funding shall be used to support Registered Apprenticeship training.*

*c. List dynamic occupations identified by the local board, and clarify the process for identifying additional dynamic occupations in the future.*

*d. Include a discussion of how the local board will promote entrepreneurial skills training and micro-enterprise services.*

*e. Describe the increased leveraging of resources brokered through the one stop center(s) for training services. Include local policy and/or local operational procedures.*

Under WIOA, training activities in the Greater Omaha area covered through an Individual Training Account (ITA) must be for in-demand occupations (high-demand, high-wage and high-skill occupations as defined per the H3 Workforce Training List, either at the State or Regional level) which is hosted on the Nebraska Department of Labor website, identified as Registered Apprenticeships or identified as In-demand by the HWS Board. Individuals must select a program that is directly linked to employment opportunities either in their area or an area to which the individual is willing to relocate. To offset the effect of the declining industries in Nebraska, occupations in cutting edge growth industries, i.e., alternative energy development, biotechnology (agribusiness), electronic manufacturing, software development, etc. shall be given special consideration even though in some cases they are too innovative to have a data track record. The HWS Board shall approve training services for ~~dynamic~~ in-demand occupations determined by the HWS Board to be in sectors of the economy that have a high potential for sustained demand or growth in the local area. When providing training under an exception to the NDOL Preliminary Policy on In-Demand Industries and Occupations for use of an ITA, at least 50% of the services must be in an in-demand occupation as defined by the H3 criteria.

Currently, green occupations have been identified as In-demand Occupations by the HWS Board. The list of these occupations is provided through the NELearns website as part of the H3 Occupation List. Those that qualify as “green” have a green leaf next to the job title. The WIOA Adult, Dislocated Worker, and Youth staff use this designation when determining if an occupation qualifies as “green”. As other occupations are defined as “in-demand”, a list will be created and maintained by the HWS Board staff and shared with the Service Provider.

Furthermore, the HWS Board will utilize national, regional and local labor market information, board member input, data from labor and business organizations such as the Chamber of Commerce and Economic Development, information from the Workforce Collaborative and historical data referencing WIOA client enrollments in eligible training provider programs to systematically align training opportunities with real job opportunities in the local area for all training. Priority will be given to Local Area sectors/industries that have high potential for sustained demand, growth and job seeker earning potential to meet or exceed the Nebraska self- sufficiency standards.

Customized training, on-the-job training, incumbent worker, and partner training will be delivered via a contract or another partner as monitored by the Board staff. The Board will continue to encourage entrepreneurial skills training and micro-enterprise. Connections have been made with the micro-business program through Catholic Charities in Omaha for the classes they offer. Information on the Small Business Administration and SCORE is also available at the American Job Center.

Greater Omaha WIOA funds are available for client trainings that are Registered Apprenticeship trainings. Relationships are developed with trade organizations that utilize apprenticeships as a means of training individuals. The Department of Labor has a Registered Apprenticeship section on its website. Referrals from this website and the American Job Center may be directed to WIOA Career Specialists for follow-up to see if individuals could benefit from WIA in assistance with the Apprenticeship program.

**Leveraging funds**

*2) Describe the Individual Training Account policy to be used in the local area. Include information such as dollar limits, duration, etc. Explain how customers receive quality workforce information and access quality training providers. The local Individual Training Account Policy is a required attachment to the final Plan.*

The HWS Board adopted the policy that Individual Training Account (ITA) funds can only be used for training that is offered by an eligible training provider who is accredited under the Board policy. The Service Provider staff will also follow the NDOL WIOA Policy for Pell Grants and Other Financial aid to ensure that funds are not duplicated and efforts are made to leverage other sources of funding as much as possible.

The HWS Board adopted the policy that participants may be enrolled in only those eligible training provider programs that can be expected to be completed by a full time student in twenty four months or less. If a participant, prior to enrollment, has completed a portion of a degree program, he/she may be enrolled to complete the unfinished degree if it can be completed in twenty four months or less. Lastly, the Board adopts the policy that an Adult or Dislocated Worker participant may only be enrolled in the WIOA program and receiving intensive and/or training services for a total of thirty consecutive months. When the participant takes longer than the planned thirty months to receive all services from the WIOA program, an extension shall be required and the extension shall require approval by the HWS Board staff.

The maximum payment by the Board for an approved ITA shall be set at $6,000. Eligible training provider payments exceeding the amounts identified above shall require approval by the HWS Board staff.

The ITA may cover the following items: tuition, fees, books and supplies that are required by the course or program curriculum. The HWS Board staff may approve additional items with approval subject to review by the Performance Committee of the HWS Board at the next scheduled meeting.

The Greater Omaha Workforce Development Area will utilize in-house fiscal systems to reimburse the Service Provider for payments to eligible training providers under an ITA.

The HWS Board also ensures that the Service Provider staff will assist participants in accessing quality workforce information and quality training providers. Computers located at a staff member’s desk or in the American Job Center resource area will all have Internet access to online workforce information resources and the list of eligible training providers. A list of eligible training providers can be accessed via TrainingLink at www.dol.nebraska.gov. Additional online workforce tools and information can be accessed through that site as well. A staff member will always be available when a client is working on a American Job Center computer to guide the client to appropriate websites, identify proper tools, and assist with general navigation of the website.

*3) Describe the process and procedures used by the local area to initially and subsequently determine eligibility for inclusion of providers on the eligible provider list. How is it ensured that such providers meet the continuously changing employment needs of local employers and participants? Explain how the list is disseminated.*

The HWS Board and the State will be responsible for managing the eligible training provider process. An application for certification as an approved training provider is available on the NDOL website via the State maintained database called TrainingLink. Upon completion of the application and subsequent approval, the training provider will be added to TrainingLink, to which the service provider and clients will have access. The eligible training providers and their approved program information will be available on TrainingLink, located on the internet at www.dol.nebraska.gov.

The State has agreed to carry out the following responsibilities in recruiting, approving and listing eligible training providers:

* Develop and maintain TrainingLink, the statewide list of eligible training providers
* Verify the accuracy of the information on TrainingLink in consultation with the local HWS Board and remove those training providers who do not meet the eligibility criteria
* Disseminate the statewide list via TrainingLink, accompanied by performance data and cost information relating each training provider to the One Stop Operators throughout the state
* Ensure the eligible training provider list is available to clients, the service provider, and other interested parties

The HWS Board has agreed to carry out the following responsibilities in recruiting, approving and listing eligible training providers:

* Review all initial applications to ensure eligibility
* Comply with the procedures prescribed by the State in determining initial eligibility of training providers
* Comply with the procedures prescribed by the State in determining the subsequent eligibility of training providers
* Use TrainingLink as the list of local training providers who meet the eligibility criteria.
* Ensure that TrainingLink is accessible to the Service Provider and used appropriately throughout the Greater Omaha One Stop system.
* Consult with the State in cases where termination of an eligible training provider is contemplated because inaccurate information has been provided or is in violation of the Act
* Make recommendations to the State regarding the process to initial and subsequent eligibility of training providers.

There are several opportunities for the HWS Board to ensure that the eligible training providers meet the continuously changing employment needs of local employers and participants. These include when Eligible Training Provider Programs are reviewed and approved, when an Eligible Training Provider is Accredited and Re-Accredited, and during any annual Accreditation reviews that may take place. Areas considered include the appropriateness of the training provider’s services and program, the local area’s employment needs and trends, and how the provider’s application/program meets these needs. A periodic review may be made of the performance of Accredited Training Providers. This review will focus on determining if clients achieved employment in occupations related to their training. An Annual Accreditation Workshop will also be helpful to ensure that the eligible training providers meet the continuously changing employment needs of local employers and participants.

State Eligible Training Provider Eligibility Criteria

* Training providers who seek subsequent eligibility must meet the required performance levels established by the HWS Board in accordance with the State policy.
* In addition to meeting the annual performance levels, the Service Provider will track the following for each training provider. This information will be available for the HWS Board to review on an annual basis:
* Program completion rates for all individuals participating in the applicable program
* Percentage of all individuals participating in the applicable programs who obtain unsubsidized employment, which may also include information specifying the
* percentage of individuals who obtain unsubsidized employment in an occupation related to the program
* Wages as placement in employment of all individuals participating in the applicable program (when available)

The following only applies to Workforce Innovation and Opportunity Act participants who complete a training program:

* The percentage of participants who have completed the applicable program and have been placed in unsubsidized employment
* The retention rates in unsubsidized employment of participants who have completed the applicable program, 6 months after the first day of the employment involved
* The rates of licensure or certification, attainment of academic degrees or equivalents, or attainment of other measures of skills, of the training participants receiving funds authorized under the Workforce Investment Act and who graduate from applicable programs.

The Governor or the HWS Board may require other verifiable and program specific performance information to obtain subsequent eligibility. In light of this flexibility, the HWS Board created an accreditation process to help ensure that eligible training providers are fully engaged in the success of the Greater Omaha Workforce Development Area and the WIOA participants. This accreditation process is in addition to the requirements set forth by the State Eligible Training Provider policy described above. A copy of the HWS Board’s Accreditation Policy is attached as Attachment Y.

*4) Describe the local appeals procedure for providers in conjunction with the state appeals procedure for providers denied approval by the WDB. The local appeals procedure is a required attachment to the final Plan.*

The Greater Omaha Workforce Development Area will utilize the following appeal process for denial of eligibility for a training provider by the HWS Board or denial of eligibility by the Service Provider for providers of on-the-job training (OJT) or customized training. This appeal process includes training providers who are subsequently terminated from a training provider list.

The training provider must submit a written request for a hearing within 20 days of the initial denial notification to the Greater Omaha Chief Elected Official.

The Chief Elected Official shall conduct a hearing within 30 days of receipt of the request for hearing. The request for hearing shall specify the reason for the denial or termination and contain a statement(s) as to why the decision should be reversed or a mutual compromise established.

The Chief Elected Official will issue a decision within 10 working days of the hearing. The decision shall identify the requirements or conditions the provider must meet in order to re- establish eligibility and, if appropriate, identify the length of time the provider must remain in ineligible status. The decision by the Chief Elected Official is final.

*5) Identify local provisions of On-the-Job Training (OJT) and customized training and how these training opportunities are marketed. The local OJT and customized training policy and/or operational procedure is a required attachment to the final Plan.*

On-the-Job Training (OJT) is training by an employer provided to a paid participant while engaged in productive employment. The employer may be from the public, private non-profit, or private sectors. The OJT training service:

* Provides knowledge or skills essential to the full and adequate performance of the job;
* Shall be available to employers who agree to hire and train an individual who does not have sufficient skills to enter employment or is not earning self-sufficient wage as determined by the HWS Board;
* Provides reimbursement to the employer for up to 75 percent of the wage rate of the clients (not to exceed $6,000) based on the size of the employer, for the extraordinary costs of providing the training and additional supervision related to the training; and
* Is limited in duration as appropriate to the occupation the client is being trained for, taking into account the training content, participant/s prior experience and the service strategy of the participant.

A training contract must be developed between the Service Provider and the employer providing the training. The Service Provider must conduct a pre-award review to determine if the employer is qualified and capable of entering into a contractual agreement to provide OJT. The pre-award review, in addition to the participant’s employment plan, will provide supporting documentation for the appropriateness of the OJT assignment. A pre-award review must be completed prior to the negotiation and approval of the OJT contract. The OJT contract must contain:

* The occupation(s) for which training is to be provided
* The length of time the training will be provided
* The wage rate to be paid to the trainee
* The rate of reimbursement to the employer
* The maximum amount of reimbursement
* A training outline that reflects the skills and competencies to be learned in the position
* An outline of any other separate classroom training that may be provided by the employer
* The employer’s agreement to maintain and make available accurate and complete time and attendance, payroll and other records to support amounts claimed by the employer for reimbursement under the contract
* Other written assurances

A more detailed explanation of the OJT contract requirements is located in Attachment N. Outreach and employer engagement efforts related to the enhancement of OJT services is described in the One Stop System section.

Customized training has the following stipulations:

* It is designed to meet the special requirements of an employer or a group of employers;
* It is conducted with a commitment by the employer(s) to employ the client upon successful completion of the training;
* The employer pays for not less than fifty percent of the training costs; and
* It must be approved by the HWS Board

A copy of the Customized Training Policy is located in Attachment J.

C. Supportive Services

*1) Identify the local area policy on supportive services that ensures service and resource coordination. Such policy should address procedures for referral to such services, including how such services will be funded when they are not otherwise available from other sources. Such policy must include whether or not needs related payments will be authorized and, if they are, establish the payment level for adults. Address coordination of transportation and, if applicable, public transportation in the local area. The local area policy on Supportive Services is a required attachment to the final Plan.*

Supportive services may include, but are not limited to, transportation, child care, health/medical assistance, dependent care, emergency housing, and needs-related payments. Participants who are participating in intensive or training services shall be eligible to receive supportive services as long as they meet two conditions. Supportive services may be available to Adult and Dislocated Worker participants up to six months after exit as long as the two conditions are still met and documented.

First, it must be determined that the supportive services are deemed necessary to enable the individual to participate in the Workforce Innovation and Opportunity Act program. Any supportive service or assistance provided by another entity must be considered when making this determination. Secondly, once the need for supportive services has been determined, the service provider staff should work with other available American Job Center programs and partners to determine that supportive services are not available from another program. Exploration of other sources may be conducted in person, via phone, internet or other methods initiated by Service Provider staff members. Exploration efforts must be documented unless it is known and can be documented that a certain service is not available via a partner agency.

The primary supportive service related to transportation will be bus tickets for the local public transit system. The service provider will maintain a list of local partners that also provide similar transportation assistance. Where bus transit is not appropriate and/or unavailable, the service provider may assist with mileage reimbursement, basic car repairs and other expenses incurred in the guarantee of making an individual’s car drivable. The Service Provider will establish appropriate limits for all supportive services, which will be subject to Board review and approval. A detailed outline of the Supportive Services is located in Attachment S.

D. Rapid Response

*1) Describe how the local area shall coordinate local workforce investment activities with statewide rapid response activities. Include: procedures and involvement in the delivery of local rapid response activities; services offered through rapid response; policy for evaluating performance; and procedures to respond to disaster. The local area Rapid Response procedure is a required attachment to the final Plan.*

Rapid response activities are those activities necessary to plan and provide Workforce Investment Act services to enable dislocated workers to transition to new employment as quickly as possible, following either a permanent facility closure, mass layoff, or a natural or other disaster resulting in mass job dislocation.

The HWS Board establishes the following policies and procedures to coordinate and deliver rapid response activities in the Greater Omaha Workforce Development area:

**Procedures for delivery of local rapid response activities**

The HWS Board will follow the direction of the State entity responsible for providing rapid response activities. The HWS Board has authorized the One Stop Center(s) and its Service Provider to assist the State entity in providing information and services to all individuals impacted by a dislocation. In addition, the HWS Board will immediately notify the State entity of any dislocation which occurs in the local area.

**Services offered through rapid response**

Rapid response activities provided by the Workforce Development Area may include:

* Onsite contact with the employer, employees or representative of the employees and representative of the local community. The onsite contact may include an assessment of the:
* Layoff plans and schedule of employer.
* Potential for averting the layoff in consultation with state or local economic development entities.
* Background and probable assistance needs of the affected employees
* Re-employment prospects and intensive and training services for affected employees in the local community or other areas where the employee is willing to relocate.
* Available resources to meet the short term and long term needs of the affected employees.
* Delivering career and training services as well as supportive services to the affected employees through the American Job Center or Service Provider delivery system.
* The provision of information and access to unemployment insurance compensation benefits and services provided through the American Job Center system including information on the Trade Adjustment Assistance.
* Assisting the State entity in providing guidance and information toward establishing a labor management committee voluntarily agreed to by labor and management or a workforce transition committee comprised of representatives of the employer, the affected employees and the local community.

**Policy for Evaluation of Performance**

The HWS Board will collaborate with the State Dislocated Workers entity, service providers, and training providers to collect and analyze information relating to economic dislocations, including potential closings and layoffs, and with other available resources in the local area to provide an adequate basis for effective program management review and to evaluate the rapid response efforts.

Methods used to collect the appropriate information will include the statewide Workforce Investment Area Management Information System (NEworks), employer surveys, economic development surveys, etc.

**Procedures to Respond to Disaster**

The HWS Board will authorize the American Job Center and local Service Provider to fully participate in any rapid response effort caused by a natural disaster or other disaster resulting in a mass job dislocation. The participation will include provisions of Dislocated Worker services and activities authorized by the Workforce Innovation and Opportunity Act and close coordination and collaboration with the State Dislocated Workers entity, other State agencies and the Federal Emergency Management Agency (FEMA).

* + 1. **Youth**

*a. Describe in detail the type and availability of youth activities in the local area identifying successful providers of such activities. Include in this discussion the local area's strategy for providing comprehensive services to eligible youth addressing these required local program elements:*

*1) Tutoring, study skills training, and instruction, leading to completion of secondary school, including dropout prevention strategies;*

*2) Alternative secondary school services, as appropriate;*

*3) Summer employment opportunities that are directly linked to academic and occupational learning;*

*4) As appropriate, paid and unpaid work experiences, including internships and job shadowing;*

*5) Occupational skill training, as appropriate;*

*6) Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors;*

*7) Supportive services;*

*8) Adult mentoring for the period of participation and a subsequent period for a total of not less than 12 months;*

*9) Follow-up services for not less than 12 months after the completion of participation, as appropriate; and*

*10) Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.*

*Identify all youth service providers currently responsible for implementing each of the WIA youth program elements in the local area. Formulate the information in a table that includes:*

|  |  |  |
| --- | --- | --- |
| *Mandatory Youth Element* | *Service Provider* | *Method of Delivery/Service Strategy* |
| 1) Tutoring, study skills training, and instruction, and evidence-based dropout preventions and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential | Goodwill Industries; Gateway to College; or other provider | The Local Area Youth program will focus a minimum of 75% of its funding on out- of-school youth; those that have either already graduated or those that have dropped out of school. In those cases where an eligible youth can re-enroll in a formal secondary setting, the youth is encouraged to do so, with program supports such as tutoring, school supplies stipends, etc. available as needed. The program utilizes its partnership with Metropolitan Community College (MCC) for their expertise in the area of adult education as a resource for participants whose educational goal is to earn a GED. Another resource that is highly utilized by participants focusing on education is the “Achieving TABE Success” materials. These are used in addition to the tutoring classes provided by the Education Specialist.  |
| 2) Alternative secondary school services, or dropout recovery services, as appropriate | Metropolitan Community College, Omaha Public Schools, Bellevue Public Schools, and other providers | The Local Area Youth Program assistsyouth in successfully pursuing credit recovery programs through the school programs or a GED by assisting them in signing up for Adult Basic Education or GED classes based on their TABE test results. Once a youth is enrolled in an ABE/GED course through an accredited provider, Career Specialists will regularly contact the class instructor and youth to maintain monthly updates on the progress of the youth. Tutoring is available as described above along with support stipends (funds for test costs, supplies, etc.) as needed. |
| 3) Paid and unpaid work experiences that have as a component academic and occupational education, which may include  a. Summer employment opportunities and other employment opportunities available throughout the school year;  b. Pre-apprenticeship programs;  c. Internships and job shadowing; and  d. On-the-job training opportunities;20% Spending Requirement **At least 20%** of the total youth funds must be spent on paid and unpaid work experiences that have an academic and occupational education component.  | Various employers forwork experience; Goodwill Industries and other providers for academic component | The program staff (Business OutreachCoordinator and Youth Business Outreach Specialist) identify numerous and vocationally diverse work sites to compliment participant ISS vocational goals by matching an individual to an appropriate work site and situation. Academic and occupational learning is accomplished through well-defined training that takes place early on in the job placement cycle. Training included Summer School, Career Exploration, College-credit courses, job readiness classes, and leadership exposure to motivational speakers. Youth in formal summer school settings are placed in settings that complement their school settings. Local Area Youth Program staff work closely with area businesses and agencies in providing job coaching, time/payroll accounting, and case management as necessary. A work experience workplace may be in the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee-employer relationship, as defined by the Fair Labor Standards Act, exists. |
| 4) Occupational skill training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved, if the local board determines that the programs meet the quality criteria established by the Governor in the State plan | Coordinated by the Service Provider with various training providers | Work experiences are planned, structured learning experiences that take place in a workplace for a limited time. The Greater Omaha Youth program assists youth in obtaining paid and unpaid work experiences, On-the-Job Training (OJT), internships, job shadowing, and educational transitional activities that complement the ISS vocational goals. The program assists you in gaining experience as well as a positive work history, and in many cases, an opportunity for permanent employment. The Greater Omaha Youth Program staff includes a Business Outreach Coordinator who is primarily responsible for managing all aspects of work experience and OJT activities within the program, including coordination with other governmental workforce development agencies when applicable. |
| 5) Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster | Various training providers | Youth are encouraged to set goals andtake full advantage of developing the appropriate skills needed in high demand, high wage, and high skill occupations. Program Career Specialists seek to find other funding sources (grants, scholarships, etc.) to help pay for training prior to spending WIOA funds. The Greater Omaha Youth Partnership works closely with Metropolitan Community College and other local colleges, and various training providers to obtain educational and vocational trade degrees and certifications. Training providers are carefully scrutinized, with NDOL’s WIA approved provider’s list given particular attention when selecting a provider. |
| 6) Leadership Development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate | Goodwill Industries and other partners | Leadership development opportunitiesencourage responsibility and other positive social behaviors. These activities may include exposure to post- secondary opportunities, community service, and service learning projects, peer centered activities including peermentoring and tutoring, organizational and team leadership training, training in decision making, including determining priorities, and citizenship training including like-skills training. |
| 7) Supportive Services for youth, as defined in WIOA section 101(59), means services that are necessary to enable an individual to participate in WIOA programs and may include the following: * assistance with transportation costs;
* assistance with child care and dependent care costs;
* assistance with housing costs; and
* assistance with needs-related payments
 | Various providers | Supportive services may include the following: linkages to community services, assistance with transportation costs, referrals to medical services and assistance with uniforms or other appropriate work attire and work related tools costs, including such items as eye glasses and protective eye gear. Working closely with program youth (both active and follow-up), Career Specialists address the barriers keeping youth from reaching their goals. Remedies to address these barriers often include providing a wide array of supportive services. |
| 8) Adult mentoring for a minimum duration of 12 months that may occur both during and after program participation | TeamMates, Goodwillstaff, private individuals | Adult mentoring is defined as a continuous relationship between a participant and an adult, most notably, case managers who spend significant time with their assigned youth. Volunteer mentors associated with certified mentoring agencies may also be used. The mentoring will be carried out via an active involvement by offering the youth, social and moral support, guidance, and assistance as the younger person goes through a difficult period, faces new challenges, or works to correct earlier problems. |
| 9) Follow-up services for a minimum duration of 12 months after the completion of participation, as appropriate\*All youth participants must receive some form of follow-up services for a minimum duration of 12 months after the completion of participation, and may be provided beyond 12 months at the Local Board’s discretion per WIOA section 129(c)(2)(I) | Goodwill Industries | While active clientele receive most of the focus, follow-up, done correctly, requires significant effort and attention. All participants must receive at least twelve months of follow-up services at exiting the program to ensure continuity of services and progress towards the performance outcomes. The follow-up services will be provided by the same program that provided the case management during participation, and will be based on the needs of the individual. Follow-up services will entail the participants being contacted at least once a month and at least four times a quarter. Follow-up services may include, but are not limited to, the following: leadership skills development, supportive services activities, regular contact with the participants’ employer, addressing the workplace issues that may arise, assistance in securing better paying jobs through job searches, career development, adult mentoring, additional training and if necessary further education, and tracking the progress of the youth in employment. |
| 10) Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate | Goodwill Industries in conjunction with other providers | Comprehensive Guidance andCounseling is the provision of those specialized activities that assist students in identifying, planning, and attaining those goals consistent with their aptitudes, needs, abilities, and interests. As necessary, a youth will be referred to a specialist (e.g. drug and alcohol abuse counseling and community based counseling). |
| 11) Financial literacy education | Goodwill Industries with banks, credit unions, etc. | Financial literacy education is offered at the HWS American Job Center and youth participants are encouraged to attend these workshops. In addition, a financial counselor is now available at the Center and youth will have the opportunity to schedule one-on-one appointments. |
| 12) Entrepreneurial skills training | Goodwill Industries with training providers | As interest is shown by participants, the Career Specialist will provide information on entrepreneurial skills training and make referrals as appropriate. In addition, the One Stop Operator is researching providing workshops on this top at the American Job Center. |
| 13) Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as:a. career awareness;b. career counseling; c. career exploration services; | Goodwill staff, NDOL website for LMI and interest surveys, and NELearn for in-demand occupations | Through computers in the Resource Area of the American Job Center and by Internet access from other computers, participants are able to access labor market information, the listing of H3 occupations, career interest surveys, etc. Based on the results, the Career Specialist will work with the youth participant to help identify career pathways and provide career guidance to help in the development of Individual Service Strategy goals. |
| 14) Activities that help youth prepare for and transition to postsecondary education and training per WIOA section 129(c)(2) | Goodwill staff; Gateway to College; and services such as Education Quest | Career Specialists will work with the participants to identify appropriate training opportunities and what is needed to be successful in transitioning to postsecondary education and training. |

*b. Explain how eligible applicants who do not meet enrollment requirements of a particular program will be referred for further assessment and appropriate programs.*

Referrals to other programs will be provided by Career Specialists to ineligible clients or those clients who are eligible but are not enrolled in the program via written notification, phone or face- to-face discussion. This conversation will take place either at the very beginning or during the intake process, or at whichever point the client’s ineligibility is determined. The Local Area Youth program staff will document referrals in the NEworks system and client case file.

*c. Describe how the local board ensures appropriate links to entities that will foster the participation of eligible local area youth. Such links may include connections to: local area justice and law enforcement officials; local public housing authorities; local education agencies; job corps representatives; and representatives of other area youth initiatives, including those that serve homeless youth and other public and private youth initiatives.*

The HWS Youth Council in conjunction with the Service Provider is developing relationships with other youth-serving agencies in order to maximize resources without duplicating services. The HWS Board will create appropriate linkages to entities that will foster the participation of eligible youth via members of the Youth Council and regular presentations to the Youth Council by community service agencies and other organizations that specifically serve youth.

The Youth Council assesses the appropriateness of partnerships with other providers of youth services by gathering the following information about those providers:

• An overview of the organization or program

• Strengths of the program

• Data about the program’s performance

• Information about how the program is funded

• Information on how a youth can become involved in the program

• The target population of the program and the program’s enrollment goal

Appropriate links to other providers would include, but not be limited to, the creation of referral systems to ensure increased co-enrollment of youth in the WIOA program and programs that provide alternate or expanded services beyond those available through WIOA. Partnering to hold community events for youth such as a job fair that promotes the WIOA program would also be considered an appropriate partnership.

The Youth Council regularly provides feedback and suggestions to the Service Provider for the development of new opportunities that may help to foster participation of eligible youth in the local area. Exploration of connections with the following agencies is actively promoted by the Youth Council: (Organizations represented on the Youth Council are identified with an asterisk.)

• Local justice and local law enforcement officials\*

• Local public housing authorities\*

• Local education agencies\*

• Job Corps\*

• Local Employment & Training Partners\*

• Local employers who support academic learning, occupational training programs, mentoring programs, internships or work experience opportunities\*

• Local refugee service organizations

• Community Learning Centers

• Local youth service agencies such as, but not limited to, Avenue Scholars, Urban League of Nebraska, Youth Emergency Services, 100 Black Men, Winner’s Circle, Nebraska Children’s and Family Foundation and Nothing But Net

Foundation\*

*d. Describe the measures taken by the local area to ensure compliance with applicable safety and child labor laws.*

The HWS Board will work with the Service Provider to ensure that a WIOA funded activity involving youth will adhere to the Fair Labor Standards Act as it relates to Child Labor Laws. This requirement will be a part of the procurement, contract negotiation and contract execution processes. The oversight will be the responsibility of the HWS Board staff and will be included as a part of the on-going monitoring efforts.

*e. Describe how the local board shall make opportunities available to individuals who have successfully participated in programs carried out under this section to volunteer assistance to participants in the form of mentoring, tutoring, and other activities.*

Volunteer opportunities could be provided to successful program participants and/or those that have successfully completed the program in a variety of ways. Partnerships with area providers such as Project Everlast, Omaha Home for Boys, Avenue Scholars, PALS, as well as community members and leaders are fostered to better enhance volunteer opportunities for participants. For current and past participants that have met particular “milestones” within the program, such as earned a credential, obtained a GED, etc., they may be invited, at the Service Provider’s discretion, to participate in volunteer and recognition activities. Volunteer activities may include participation in a rap session, speaking at a workshop, mentoring a participant, and serving on the Youth Council.

*f. Identify the criteria used in awarding grants for youth activities. Criteria should address what determines effective and ineffective youth activities and providers of such activities. The criteria shall be determined by the local WDB and youth council and include, but not be limited to, the state minimal criteria.*

The Greater Omaha Workforce Development Area will utilize the HWS and City of Omaha procurement policies to select providers of youth activities not provided by the American Job Center partners and normal service providers. The Youth Council will establish, on an as needed basis, specific criteria to be included in the proposal. These criteria may vary depending on the service needs. The proposal will require each entity that responds to identify their ability to deliver the required service, fiscal capability, individual costs, previous experience in delivering such services, and information supporting the success of past efforts. Providers of youth services will be solicited by the HWS Board once a need has been established.

The evaluation process will be done by a committee of diverse members. The State Purchasing Bureau recommends a minimum of five (5) members. This committee will be supported by staff with the appropriate expertise to conduct such proposal evaluations. Purchasing further recommends that the individuals be from various agencies/divisions/organizations.

The following areas of consideration will be used in making the selection:

* **Executive Summary** - Understanding the Local Area’s Needs - The contractor’s understanding of the needs as specified in the RFP, of the objectives in asking for the services, and of the nature and scope of the work involved;
* **Corporate Overview/Contractor Qualifications** - The ability of the contractor to meet the requirements of the RFP;
* **Professional Personnel** - The competency of professional personnel who will be assigned by the contractor to provide youth services during the contract. Qualifications of professional personnel will be evaluated by education and relevant experience.
* **Technical Approach - Soundness of Approach** - The proposed method for meeting the proposed RFP technical requirements;
* **Cost** - Cost will be considered to the extent that the State receives maximum value for the least cost.
* **Oral Interviews** – The oral interviews may or may not be required.

*g. Describe the competitive procurement process for selection of local service providers. Include information on efforts made to ensure that information on websites about applying for grants or becoming service providers is easy to find and understand for those non-profit organizations seeking to partner with the workforce investment system.*

The HWS Board will follow the appropriate City, State and Federal procurement standards to solicit proposals, bids, and applications for an award of all grants and contracts which are developed to procure services or activities determined as allowable under federal rule. A review of the federal procurement standards will be conducted prior to the award of any grant or contract to ensure that the State standards meet federal requirements. The HWS Board will utilize the Request for Proposal (RFP), the Invitation for Bid (IFB), or an application process to select such providers. The HWS Board may utilize the non-competitive process for awards under $20,000 but will adhere to the appropriate procurement standards when this process is used.

The HWS Board reserves the right to select the respondent who delivers services that are cost effective, efficient, and best meet the needs of the request. Lowest cost shall not be the sole criteria for the final selection.

*h. Describe how the local area will establish and disseminate a list of eligible providers of youth activities. Include information on efforts made to ensure this information is available electronically and easy for the public to find.*

The HWS Board Youth Council will utilize providers of youth activities outlined on the statewide 211 website. This resource mapping information is available at the [www.ne211.org](http://www.ne211.org) website. Resources identified for the provision of youth services will be reviewed with the Youth Council on a regular basis.

Nebraska 211 is a database of information on several thousand agencies, programs and services across the state. It is maintained by I & R Nebraska (IRNe), a collaborative group of organizations from across the state working to ensure that individuals have an easy means to search the entire state for health and human service agencies and programs serving their area to find the help they need. The project partners work to ensure that its information is current and updated. Each agency is contacted twice per year for updates. Information concerning this website will be available in the American Job Center and will be utilized by Career Specialists in order to identify providers of youth activities in the Greater Omaha Workforce Development Area.

In addition to this website, the Greater Omaha Youth Program will also utilize training providers located on the State TrainingLink website that are approved by one of the Local Workforce Development Boards and accredited by the HWS Board and other providers approved by the Youth Council to deliver youth services as appropriate. Youth service providers must have all appropriate federal, state and local certifications as relevant to their services. If the Greater Omaha Youth Program provider would like to utilize a training provider that is not approved by one of the Local Workforce Development Boards and accredited by the HWS Board and/or not located on the Resource Mapping document or TrainingLink, they are required to receive approval from the Youth Council to utilize the training provider prior to expending any WIA funds at such an institution. Other providers so approved will be listed on [www.hws-ne.org](http://www.hws-ne.org) on the Home page under News/Events.

*i. Describe the local appeals procedure for providers in conjunction with the state appeals procedure for providers of youth activities denied approval by the WDB.*

The Local Appeal Procedure established by the HWS Board Accreditation Sub-committee states that the training provider must submit to the Board Chair within thirty (30) days, a written request for a hearing of the initial denial of notification. The Board Chair shall conduct a hearing within 45 days upon receipt of the request for hearing. The request for hearing shall specify the reason for the denial or termination and contain a statement(s) as to why the decision should be reversed or a mutual compromise established. Recommendations are forwarded to the Chief Elected Official (CEO). The CEO will issue a decision within 15 days of the hearing. The decision shall identify the requirement or conditions the provider must meet in order to reestablish eligibility and if appropriate identify the length of time the provider must remain in ineligible status. The decision by the CEO is final.

*j. Specify out-of-school youth expenditure requirements based on the state’s minimum expenditure requirements. Out-of-school youth are considered “an important part of the new workforce supply pipeline needed by businesses to fill job vacancies in the knowledge economy.”*

The HWS Board has instructed the Youth Service Provider that at least 75% of the total WIA youth funds should be expended on out-of-school youth. The HWS Board embraces the Employment and Training Administration’s Strategic Vision for the Delivery of Youth Services, and by nature of doing so, expects to meet or exceed this minimum requirement while still serving In-School Youth.

* 1. **Performance Measures**

*a. Describe the local levels of performance negotiated with the Governor and chief elected official pursuant to section 136(c) to be used to measure the performance of the local area and to be used by the local WDB for measuring the performance of the local fiscal agent (where appropriate), eligible providers, and the One-Stop delivery system.*

The HWS Board is required to establish local performance measures in order to evaluate program effectiveness and achieve continuous improvement in the delivery of Workforce Investment Act programs.

The following chart is an historical picture of baseline goals of the Common Measures through PY2014. Performance Measures for PY15 have not yet been finalized (as of May 19, 2015).

**ADULTS**

**PY2006 PY2007 PY08/09 PY10/11 PY12 PY13/14**

Entry into unsubsidized employment 86% 86% 83% 78.8% 70.0% 72.0%

6 months retention in such employment 87% 87% 87.5% 83.1% 85.4% 88.0%

6 months average earnings $9424 $10,036 $10,186 $10,000 $10,900 $10,900

**DISLOCATED WORKERS**

Entry into unsubsidized employment 91% 91% 91.5% 89% 90.3% 89.0%

6 months retention in such employment 93% 93% 93% 90% 94.4% 94.0%

6 months average earnings $12,930 $13,440 $13,574 $13,000 $16,757 $16,000

**YOUTH**

Placement in Employment or Education 76% 76% 76.0% 70.0%

Attainment of Degree/Certificate 73% 73% 61.8% 62.0%

Literacy & Numeracy 38% 38% 52.0% 55.0%

WIOA Performance Measures will be in full effect July 1, 2016. Strategies are being put in place now with the Service Provider, to address the new measures.

*b. Describe current methods for measuring customer satisfaction.*

The Workforce Solutions Center collects written Customer Satisfaction Surveys which are completed by customers as they choose. These surveys are provided to customers throughout the American Job Center Resource Area and by individual partners who are co-located there. These are collected by the One Stop Operator for review. The AJC Manager compiles the data and reports the information monthly to the HWS Board staff and full Board/Executive Committee. The AJC Manager meets immediately (whenever possible) with customers who express concerns. In other cases, she follows up with the individuals by phone. An analysis of the survey results is used to enhance the services provided at the American Job Center.

*c. Describe how the local area’s service strategy is designed to meet WIOA performance.*

To ensure success for the placement in Employment or Education and the Attainment of a Degree or Certificate measures, all youth in the program will have an Individual Service Strategy (ISS) that will outline specific employment and/or education goals. The ISS will be developed upon enrollment in the program and updated regularly. Participants enrolled in training will be enrolled in at least one program leading to a certificate as defined by the State Attainment of a Degree or Certificate Performance Measure policy. Alternate training that is necessary to obtain employment can be completed, but the primary training for all youth participants in training shall lead to a certificate as defined by the State Attainment of a Degree or Certificate Performance Measure policy. Participants with ISS training and employment goals will be exited from the program only if they have completed these goals or are on track to do so within the performance time frame set for each measure (provided the client is not exited with an exclusionary code or administrative separation). Administrative Separation from the program will only be used after many and varied attempts have been made to help a client engage and be successful in the completion of the goals outlined in the ISS.

Specific to the Literacy & Numeracy Common Measure, the Greater Omaha Youth Program Service Provider has reduced the Education Specialist to a part-time position in light of this performance measure being eliminated under WIOA. At this time, the Youth Council has recommended retaining this performance measure. The full impact of doing so and how this will be accomplished will be reviewed before full implementation. This staff person performs all client pre-tests, post-tests, tutoring, and instruction. This best practice has yielded positive results in the improvement of client performance and consequently, performance on this particular measure.

As with the Youth program, the Adult and DLW programs are emphasizing shorter term trainings that result in a credential to help make the participant more marketable to employers. In addition, the Service Provider’s Business Outreach Coordinator works with the Adults and DLWs for On-the-Job Training (OJT) and Apprenticeships. Emphasis in this area is designed to improve the Entered Employment and Retention Rates. HWS Board staff receives monthly reports on the status of OJTs. The staff also monitors training provided to the Service Provider staff for all program areas to ensure best practices for impacting program outcomes is achieved. The HWS staff and the Service Provider actively work together on opportunities to enhance the staff’s ability to excel in these performance areas. They regularly review performance data to ensure accuracy, for potential indicators of areas of improvement, and with thoughts on how to enhance outcomes.

* 1. **Equal Opportunity, Affirmative Action, and Grievance Procedures**

*a. Provide the name, title, telephone number, and job description of the administrative entity's Equal Opportunity Officer.*

Erin Porterfield, Executive Director and Equal Opportunity Officer

Heartland Workforce Solutions, Inc.

5752 Ames Avenue

Omaha, NE 68104

Telephone: 402-218-1163

The job description of the Equal Opportunity Officer is attached as Attachment AA.

*b. Provide a copy of the administrative entity's EO policy statement. The EO Policy Statement is a required attachment to the final plan.*

The Greater Omaha Workforce Development area will ensure nondiscrimination and equal opportunity by adhering to all federal and state laws and regulations covering this subject. The local HWS Board will also require each contractor, subcontractor and/or any recipient of WIOA funds to assure they will not discriminate or deny program access on the basis of race, color, national origin, age, handicap, sex, religion, citizenship, political affiliation or belief.

*c. Describe the local area's complaint and grievance procedures. The procedures must explain the process for dealing with grievances and complaints from participants and other interested parties affected by the local Workforce Investment System, including American Job Center partners and service providers. Specifically, indicate the procedure from initial filing of the complaint up to appeal to the Secretary of Labor.*

*Describe the criteria and selection process for choosing an impartial hearing officer when needed. The local area’s complaint and grievance policy or written procedure is a required attachment to the final plan. If the local area’s policy or procedure addresses all of the elements outlined in this section then referencing the attached policy/procedure is an adequate response. If the local policy/procedure does not address all the elements in this section then those missing elements should be provided in this section.*

The Greater Omaha Workforce Development area adopts the following procedures for processing complaints that allege violation of equal opportunity provisions of WIOA. These procedures will provide for prompt and equitable resolution of complaints.

These procedures shall also apply to the American Job Center, One Stop Operator, training providers, service providers, their sub-recipients, and other contractors with the Greater Omaha Workforce Development Area.

A written notification of the resolution of such a complaint will be provided to the complainant within 60 days of the filing of the complaint. This written notification will include a statement of the complainant’s right to file a complaint with the Director, Directorate of Civil Rights (DCR), U. S. Department of Labor, 200 Constitution Avenue NW, Room N-4123, Washington, DC,

20210.

**Complaint Process**

Who may file: Any person who believes that he or she or any specific class of individuals has been or is being subjected to discrimination prohibited by the equal opportunity provisions of WIOA may file a written complaint by him or herself or by a representative.

Where to file: The complaint may be filed with the Equal Opportunity Officer, Heartland Workforce Solutions, Inc., 5752 Ames Avenue, Omaha, NE 68104; or with the Director, Directorate of Civil Rights (DCR), U. S. Department of Labor, 200 Constitution Avenue NW, Room N-4123, Washington, DC, 20210; or at the local level, including the One Stop operator, training provider, service provider or any sub-recipient who receive federal funds from the HWS Workforce Development Board.

Timeline for Filing: The complaint must be filed within 180 days of the alleged violation. Extensions may be granted for good cause shown. Extensions shall be for administrative convenience only, and shall not create a defense for the respondent.

Contents of Complaints: Complaints must be in writing, and:

• Be signed by the complainant or his or her authorized representative;

• Contain the complainant’s name and address (or specify another means of contacting him

or her);

• Identify the respondent; and

• Describe the complainant’s allegations in sufficient detail to allow the respondent to know whether:

The respondent has jurisdiction over the complaint and will determine that:

• The complaint filing was timely; and

• The complaint has apparent merit, i.e., whether the allegations, if true, would violate any of the equal opportunity provisions of WIOA. The information required by this paragraph may be provided by completing and submitting the Directorate’s Complaint Information and Privacy Act Consent Forms.

Right to Representation: Each complainant and respondent has the right to be represented by an attorney or other individual of his or her own choice.

Time Schedule: The respondent is allowed 60 days to process a complaint, provide a written resolution to the complainant, and inform the complainant of the right to file a complaint with the Directorate of Civil Rights within 30 days of the end of the 60-day period.

Failure to Respond to Complaint: The complainant may file a complaint with the Directorate of Civil Rights if the respondent has not processed the complaint and notified the complainant or the resolution at the end of sixty days. This complaint must be filed by the complainant or his or her representative within 30 days. The Directorate of Civil Rights may extend this 30-day limit if the complainant was not notified or for cause.

Notification of Non-jurisdiction: The respondent shall notify the complainant in writing if it does not have jurisdiction over the complaint. This notification must include the basis of this determination, and a statement of the right to file a written complaint with the Directorate of Civil Rights within 30 days of the receipt of the notification.

Insufficient Information: The respondent will contact the complainant for information. A complaint may be closed by sending a notice to the complainant’s last known address if:

* The complainant does not furnish sufficient information.
* The complainant does not respond.

Right to file with the Directorate of Civil Rights: The complainant may file a complaint with the

Directorate of Civil Rights both initially or as a review of an offered resolution.

**Process for Grievances and Complaints of a Non-Discriminatory Nature**

Submission Requirements

The following provides standardized procedures for the submission and processing of complaints that allege:

* Violations of WIOA Act, regulations or agreements under the Act and other non-criminal complaints.
* Violations of the labor standards provisions at Section 181(b), i.e., violations involving activities that impact wages of employees, displacement, working conditions, and employment conditions.
* Violations of the relocation provisions in Section 181(d).

Each local area, State, and direct recipient must:

* Provide information about the content of the grievance and complaint procedures to participants and other interested parties affected by the local Workforce Investment System, including American Job Center partners and service providers.
* Make reasonable efforts to assure the grievance and complaint procedures information is understood by affected participants and other individuals, including youth and those who are limited-English speaking individuals. Such efforts must comply with the language requirements of 29 CFR 37.35 regarding the provision of services and information in languages other than English.
* Respond to written complaints through written acknowledgement of receipt and explanation of status and next steps. If an oral complaint is received, an informal attempt at resolution can take place prior to the filing of a written complaint. If resolution does not result, the complaint must be put in writing. Complaints must be legible, signed by the complainant or the complainant's authorized representative, and dated. In the event the complainant is unable to provide a written statement, an alternative method of obtaining written documentation from the complainant shall be pursued, which may include assistance by agency staff or local service provider.

These procedures will be available to all WIOA staff, applicants, participants, American Job Center and One-Stop partners, service providers, sub-recipients, contractors, labor unions, community based organizations or other interested parties seeking to do business with Workforce Solutions, Inc.. Dissemination will be made through the Internet, HWS Operations Manual, grant awards, and upon request. These procedures provide for prompt and equitable resolution of complaints.

**Who May File**

A complaint may be filed by any individual or organization, including but not limited to:

* Program Participants
* Contractors
* WIOA Staff
* Local Area Staff
* One-Stop Partner Staff
* Applicants for Program Participation
* Labor Unions
* Community Based Organizations.

The identity of the complainant or any other person who has furnished information or assisted in an investigation of a complaint will be kept confidential to the maximum extent possible, consistent with a fair determination of the issues.

No person, organization or agency may retaliate against any individual who files a complaint or testifies during complaint proceedings. Any individual may file a complaint without fear of jeopardizing their position, opportunity for advancement, salary increase or denial of rights, and benefits provided by the Act, regulations, or state and local laws.

**Time Frames**

Except for complaints alleging fraud or criminal activity, complaints shall be made within one hundred and eighty (180) days of the alleged occurrence. This policy provides that complaints submitted under this procedure will be either resolved or a decision issued within sixty (60) days.

**Submission Requirements for the Complaint**

Local Area Procedures: These procedures may be utilized in lieu of local entity procedures, providing no local procedures are in effect. If local procedures are in place, the local process must be exhausted before a complaint or grievance can proceed through this system.

Complaints and grievances not resolved at the Administrative Entity level shall be submitted to the:

Greater Omaha Chief Elected Official

Mayor of Omaha

1819 Farnam Street, Third Floor

Omaha, NE 68102

Elements to include in the Complaint Requesting Appeal of Career Center Decision: Complaints must be legible, signed by the complainant or the complainant's authorized representative, and dated. The date of receipt of the written complaint by the appropriate authority triggers the clock for counting days of action taken.

* Complaints must pertain to a single subject, situation or set of facts.
* The name, address and phone number must be clearly indicated. If the complainant is represented by an attorney or other representative of the complainant's choice, the name, address and phone number of the representative must also appear in the complaint
* Complaints must state the name of the party or parties complained against and, if known to the complainant, the address and phone number of the party or parties complained against.
* Complaints must contain a clear and concise statement of the facts including pertinent dates constituting the alleged violations.
* Complaints must cite the provisions of WIOA regulations, grants or other agreements under WIA believed to have been violated, if known.
* Complaints must state the relief or remedial action(s) sought.
* Copies of documents supporting or referred to in the complaint must be attached to the complaint.

**Investigation and Initial Determination**

The HWS Executive Director will review and/or investigate the alleged incident and issue a written initial determination within ten (10) days.

The Initial Determination will include:

* Statement of Issues
* Initial Determination
* Reason for Determination
* Opportunity for Complainant to request a hearing if not satisfied with the determination.

**Hearing**

If the complainant is not satisfied with the Initial Determination, they may request a hearing before an impartial hearing officer. The request for hearing will be filed within seven (7) days of receipt of the Initial Determination. The hearing will be conducted in an informal manner and formal or technical rules of evidence will not apply.

If a hearing is requested, the HWS Executive Director will:

* Arrange for a hearing in the complainants locale if possible.
* Insure the hearing is held within thirty (30) days of filing.
* Prepare a written notice of hearing and forward to all affected/interested parties.

The written notice of hearing will include:

* Identity of hearing officer;
* Date, time, and place of hearing; and
* How hearing will be conducted and issues to be decided.
* The opportunity to withdraw the request before the hearing. This request must be received in writing before the hearing date.
* The opportunity to bring witnesses and/or documentary evidence.
* The opportunity to be represented by an attorney or representative selected by the complainant.
* The opportunity to have records or documents relevant to the issues to be decided at the hearing produced by their custodian.
* The opportunity to question any witness or parties.
* The opportunity to amend the complaint prior to the hearing.

The decision of the hearing officer will be rendered, in writing, within ten (10) days from the date of hearing. The decision will include:

* A statement of issues presented at the hearing; and
* Hearing Officer's decision; and
* Reason for decision; and
* Recommended remedies to be applied.
* If the issues are not resolved at the local level, then there needs to be an opportunity for a local level appeal according to the procedures below and submitted to the State at:

Nebraska Department of Labor

Office of Employment and Training

550 South 16th Street

Lincoln, Nebraska 68509

**State Appeal/Review Process**

Appeal of a Local Area Grievance or Complaint: If the complainant does not receive a determination on a complaint filed at the local level within sixty (60) days of filing, or if either party is dissatisfied with the local hearing decision, an appeal may be made to the State. The request for review shall be filed within ten (10) days of receipt of the adverse determination or, if no determination is made within sixty (60) days, then at any time prior to receipt of a determination from the local level. Staff will review and/or investigate, provide opportunity for a hearing, and the hearing officer will issue a decision within sixty (60) days of the appeal to the State. A complainant may withdraw his/her appeal at any time prior to the hearing. The decision is final unless appealed to the Secretary.

Statewide Workforce Investment System Grievance or Complaint Review Process: Grievances and complaints from participants and other interested parties affected by Statewide Workforce Investment programs may be submitted to the State at:

Department of Labor

Office of Employment and Training

550 South 16th Street

Lincoln, Nebraska 68509

If it is determined that the complaint is directly related to the local WIOA program, then the complaint/grievance will be remanded to the local area grievance process. Local level procedures shall be exhausted before the complaint may be addressed at the State level. The local area shall either resolve the complaint informally or have a hearing and issue a final local decision within sixty (60) days.

Elements to Include in the Complaint Requesting Appeal of Local Area Decision or State Review:

* Complaints must be legible
* signed by the complainant or the complainant's authorized representative, and dated. (The date of receipt of the written complaint by the appropriate authority [local area, State, or direct recipient], triggers the clock for counting days of action taken.)
* Complaints must pertain to a single subject, situation or set of facts.
* The name, address and phone number must be clearly indicated. If the complainant is represented by an attorney or other representative of the complainant's choice, the name, address and phone number of the representative must also appear in the complaint.
* Complaints must state the name of the party or parties complained against and, if known to the complainant, the address and phone number of the party or parties complained against.
* Complaints must contain a clear and concise statement of the facts including pertinent dates constituting the alleged violations.
* Complaints must cite the provisions of WIOA regulations, grants or other agreements under WIA believed to have been violated, if known.
* Complaints must state the relief or remedial action(s) sought.
* Copies of documents supporting or referred to in the complaint must be attached to the complaint.

**Investigation and Initial Determination**

The Office of Employment and Training will review and/or investigate the alleged incident and issue a written initial determination within ten (10) days.

The Initial Determination will include:

* Statement of Issues
* Initial Determination
* Reason for Determination
* Opportunity for Complainant to request a hearing if not satisfied with the determination.

**Hearing**

If the complainant is not satisfied with the Initial Determination, they may request a hearing before the Commissioner of Labor or an appointed representative. The request for hearing will be filed within seven (7) days of receipt of the Initial Determination. The hearing will be conducted in an informal manner and formal or technical rules of evidence will not apply.

If a hearing is requested, the Office of Employment and Training will:

* Arrange for a hearing in the complainants locale if possible.
* Insure the hearing is held within thirty (30) days of filing.
* Prepare a written notice of hearing and forward to all affected/interested parties.

The written notice of hearing will include:

* Identity of hearing officer, date, time, and place of hearing, how hearing will be conducted and issues to be decided.
* The opportunity to withdraw the request before the hearing. This request must be received in writing before the hearing date.
* The opportunity to bring witnesses and/or documentary evidence.
* The opportunity to be represented by an attorney or representative selected by the complainant.
* The opportunity to have records or documents relevant to the issues to be decided at the hearing produced by their custodian.
* The opportunity to question any witness or parties.
* The opportunity to amend the complaint prior to the hearing.

The decision of the hearing officer will be rendered, in writing, within ten (10) days from the date of hearing. The decision will include:

* A statement of issues presented at the hearing.
* Hearing Officer's decision.
* Reason for decision.
* Recommended remedies to be applied.

**Appeal to the Secretary of Labor**

The Secretary of Labor shall investigate an allegation of a violation of the requirements of Title I if:

1. A decision relating to a Statewide Workforce Investment program grievance or complaint has not been reached within sixty (60) days of receipt of the grievance or complaint or within sixty (60) days of receipt of the request for appeal of a local level grievance and either party appeals to the Secretary; or

2. A decision relating to such violation has been reached and the party to which such decision are adverse appeals such decision to the Secretary.

All appeals to the Secretary of Labor must be submitted by certified mail, return receipt requested, to the:

Secretary, U.S. Department of Labor

Washington, D.C. 20210

Attention: ASET

A copy of the appeal must be simultaneously provided to the opposing party and to:

Region V Administrator

U.S. Department of Labor

Employment and Training Administration

230 S. Dearborn Street

Chicago, Illinois 60604

Appeals made under (2) above must be filed within sixty (60) days of the receipt of the decision being appealed. Appeals made under (1) above must be filed within 120 days of the filing of the grievance with the State, or the filing of the appeal of a local grievance with the State. All appeals should contain the following information:

* The full name, telephone number (if any) and address of the person making the complaint.
* The full name and address of the respondent against whom the complaint is made.
* A clear and concise statement of the facts, including pertinent dates, constituting the alleged violation.
* The provisions of the Act, regulations or grant or other agreements under the Act believed to have been violated.
* A statement disclosing whether proceedings involving the subject of the request have been commenced or concluded before any Federal, State or local authority and if so, the date of such commencement or conclusion, the name and address of the authority and the style of the case.
* The Secretary is required to make a final determination relating to an appeal no later than 120 days after receiving such appeal.

**Remedies**

Remedies that may be imposed through this grievance/complaint process for a violation of any requirement of Title I shall be limited to:

* Suspension or termination of payments under this title;
* Prohibition of placement of a participant with an employer that has violated any requirement under this title;
* Where applicable, reinstatement of an employee, payment of lost wages and benefits, and reestablishment of other relevant terms, conditions, and privileges of employment; and
* Where appropriate, any other relief available under Title I of the Workforce Investment Act of 1998.

**Other Remedies**

Nothing prohibits a grievant or complainant from pursuing a remedy authorized under another Federal, State, or local law for a violation of Title I of the Workforce Investment Act.

**Violations of the Labor Standards Provisions at Section 181(b)**

Complaints Related to Conditions of Employment: Employees of the Local Areas and Sub- Contractors shall submit and resolve complaints through local employer procedures.

Each employer of WIA participants who is a recipient of WIA funds shall continue to operate or establish and maintain a grievance procedure relating to the terms and conditions of employment.

Employers, including private-for-profit employers of WIA participants, may operate their own grievance system or may utilize the grievance system established by the State or the Local Area. Employers shall inform WIA participants of the grievance procedure they are to follow when the participant begins employment.

A complainant may appeal/submit the complaint if any of the following conditions exist:

* The employing agency does not operate a complaint system.
* The employing agency operates a complaint system but the procedures are not followed.
* The complaint alleges a violation of Federal or State rules and regulations.

Appeal to the Secretary: When the grievance alleges violation of Section 181(b) and the grievance procedure rights have been exhausted or the 60-day time period has elapsed without a decision, either party to such procedure may submit the grievance to the Secretary of Labor. The Secretary shall investigate the allegations and make a determination as to whether a violation of Section 181(b) has occurred.

If a modification or reversal of the decision issued pursuant to the recipient's grievance procedure is warranted, or the 60-day time period has elapsed without a decision, the Secretary may modify or reverse the decision, or issue a decision if no decision has been issued, after an opportunity for a hearing.

If the Secretary determines the decision issued pursuant to the grievance procedure is appropriate, the determination shall become the final decision of the Secretary.

Binding Arbitration: As an alternative to the above, a person alleging a violation of Section 181(b) may submit the grievance to a binding grievance procedure if a collective bargaining agreement covering the parties to the grievance so provides. However, binding arbitration decisions are not reviewable by the Secretary, and the remedies available to the grievant are limited to those set forth in the Act.

**Violations of the Relocation Provisions in Section 181(d) of the Act**

When the grievance alleges violation of the Relocation Provisions in Section 181(d) of the Act, the grievance may be submitted to the Secretary of Labor for investigation to determine whether the State or local area is in compliance with the Act.

If the Secretary determines that a violation of the relocation prohibitions has occurred, the Secretary shall require the State that has violated such provisions to repay to the United States an amount equal to the amount expended in violation.

**Recordkeeping Requirements**

Complaint records must be retained for a minimum of three years following resolution of the complaint. These records should be made available for review, as needed for compliance verification purposes.

*d. Describe the means by which the grievance and complaint procedures information is made available electronically to all individuals, particularly those with hearing or visual impairments and limited English speaking abilities.*

Individuals may access any of the American Job Center materials or specific grievance and complaint procedures upon request of the Center’s or HWS Administrative staff. Individuals may also request grievance documents via email. All staff will make reasonable accommodations to meet the individual’s needs. Staff will also obtain sign language interpreters, print out large print and Braille documents and further assist with the visually impaired population and support TDD or TTY access. When electronically accessing the procedures while at the Center, visually impaired individuals will be able to use software that will read the material to them. Depending on the extent of the visual impairment, the screen view of the material may also be enlarged.

For those clients that have limited English speaking abilities, we have translators and interpreter services available. For electronic accessibility at the Center, arrangements for an interpreter would be made as needed. Limited English Proficiency (LEP) Assistance Procedures have been developed to provide individuals with limited English proficiency information on accessing programs and services provided by the American Job Center and One Stop Partners on an equitable basis. This plan addresses the entities that receive Federal financial assistance under Title 1 of the Workforce Investment Act and programs and activities that are part of the One Stop delivery system operated by One Stop partners identified in the Act.

* 1. **Continuous Improvement**

*a. Provide a description of how the local WDB will ensure the continuous improvement of eligible providers of services and ensure that such providers meet the employment needs of local employers and participants.*

Key to developing an effective system will be the flexibility to adjust to meet the changing employer and employee needs for skills training and skilled employees. As part of the HWS Board continuous improvement strategy, a strategic planning session was held in August 2014 to identify key focus areas. One of these relates to the work done with businesses to assist with hiring needs. This need is the basic tenant of our mission statement: To promote and develop a workforce system that is responsive to the needs of business and career seekers resulting in economic prosperity. By meeting the mission driven objectives outlined below, the Board will ensure continuous improvement to meet employment needs. The Youth Council and Performance Committee are charged with this role and to inform the Board as a whole about performance and opportunities for improvement.

• Ensure job candidates have basic skills in literacy and numeracy to be hired in the marketplace.

• Prepare job candidates with the essential employability skills to be retained in the workplace.

• Support attainment of educational and employment credentials to fill essential jobs.

*b. Describe efforts to continuously improve in meeting performance.*

Similar to the priority set by the State, the HWS Board has set its own goal to focus on the continuous improvement of meeting and exceeding performance standards. The Board has developed a comprehensive Service Provider oversight system to include monthly reporting, quarterly file reviews and frequent technical assistance. It is also enhancing Youth Council, Performance Committee, and Service Provider knowledge on the ability to impact and manage performance outcomes. Ongoing staff training to enhance not only technical skills but also an in- depth understanding of the program, will lead to more effective case management and have a positive impact on performance outcomes.

Additionally, the Board set a goal to obtain and implement a common intake and data system for partners to increase efficiency and measure opportunities to increase performance among the wider workforce partners inclusive of WIOA.

1. **REQUIRED ATTACHMENTS**
2. Signed Assurances
3. Budget, Participant, and Exit Summary Form – Adult
4. Budget, Participant, and Exit Summary Form – Dislocated Worker
5. Budget, Participant, and Exit Summary Form – Youth
6. Budget Summary – Administration
7. Local Area Participant Appeals Procedure
8. CEO Agreement
9. CEO/WIB Agreement
10. Local Area Complaint and Grievance Policy and/or Procedure
11. Local Area Customized Training Policy and/or Procedure
12. Local Area Equal Opportunity Policy Statement
13. Local Area Individual Training Account Policy
14. Memorandums of Understanding
15. Local Area On-the-Job Training Policy and/or Procedure
16. Proof of Publication of the Public Notice
17. Public Comments on Plan
18. Local Area Rapid Response Procedure
19. Signature Sheet
20. Local Area Supportive Services Policy
21. WIB By-laws
22. WIB Membership List
23. Youth Council Membership List
24. WIA Grant Agreement with NDOL
25. HWS Organizational Chart
26. Accreditation Process Policy
27. Performance Oversight Plan
28. Equal Opportunity Officer Job Description
29. HWS Procurement Policy
30. Incumbent Worker Policy