

Local Area Plan Instructions Policy

References:

Workforce Investment Act of 1998; Federal Register/Vol. 65, No. 156/August 11, 2000; State Workforce Investment Plan; TEGL 15-10; TEGL 9-10; TEGL 13-06; TEGL 28-05; TEGL 14-04; TEN 15-10; TEN 17-06; P.L. 109-234; and Fed. Register/Vol. 73, No. 231/December 1, 2008, Fed Register/Vol. 76, No 138/July 19, 2011

Purpose:

The purpose of this document is to provide guidance to local workforce investment boards and chief elected officials in the submission of their local strategic plan for the three-year period of **July 1, 2014 through June 30, 2017** for Title I of the Workforce Investment Act of 1998 and the Wagner-Peyser Act.

Background:

“Each local board shall develop and submit to the Governor a comprehensive 5-year local plan (referred to in this title as the ‘local plan’), in partnership with the appropriate chief elected official. The plan shall be consistent with the State plan.” Sec. 118(a)

Action:

After the 10 day public review period, this policy is considered final. Questions and comments should be submitted in writing to Stan Odenthal, Policy Coordinator, stan.odenthal@nebraska.gov.

Policy:

These planning instructions provide a framework for the local workforce investment plan. The local plan must contain an executive summary, administrative section, operational section, and attachments. The plan must be developed by the local Workforce Investment Board in partnership with the chief elected official. It must provide the Workforce Investment Board's strategy for addressing customer needs using a system that is delivered through integrated, user-friendly services accountable to the customers and the public.

Where the instructions call for a description or explanation, the narrative must provide sufficient detail so the general public or interested parties are able to understand the process or procedure described and, therefore, are able to make informed responses or comments.

The Nebraska Workforce Investment Board (NWIB) shall assist the Governor in the review of the local plans. Local Workforce Investment Boards (WIBs)/Chief Elected Officials may be requested to provide clarifications to specific sections of the local plan.

“A local plan submitted to the Governor under this section shall be considered to be approved by the Governor at the end of the 90-day period beginning on the day the Governor receives the plan, unless the Governor makes a written determination during the 90-day period that; (1) deficiencies in activities carried out under this subtitle have been identified, through audits conducted under section 184 or otherwise, and the local area has not made acceptable progress in implementing corrective measures to address the deficiencies; or (2) the plan does not comply with this title.” Sec. 118(d)

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STATE OF NEBRASKA

LOCAL PLAN INSTRUCTIONS

for

The Workforce Investment Act

Program Years 2014 – 2016

July 1, 2014 – June 30, 2017

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I. PLANNING TIMETABLE

*For new local plans or plan modifications for the three-year period of **July 1, 2014 through June 30, 2017.***

December 2013	Develop plan instructions
January, 2014	Distribute and post plan instructions
January 27, 2014	Local Workforce Investment Boards notify Joan Modrell at joan.modrell@nebraska.gov whether they will submit a new Workforce Investment Strategic Plan or extend their current plan through a plan modification
March 14, 2014	Website available to upload new local plan (Option 1) and attachments
April 7, 2014	Local Workforce Investment Boards electronically upload to the website one copy of the proposed new plan, or submit electronically a plan modification to Joan Modrell at joan.modrell@nebraska.gov and required attachments after 30 days of public comment
April 18, 2014	Requests are due to the Office of Employment and Training for Recertification of Local Workforce Investment Boards
May 5, 2014	Copy of proposed plan, with State staff comments, is forwarded to Performance Committee of Nebraska Workforce Investment Board and local area representatives
May 21, 2014	Performance Committee meets and reviews local plan or plan modifications and WIB Recertifications
June 2, 2014	The local area will upload electronically to the website one fully executed final new plan or submit electronically a plan modification to Joan Modrell at joan.modrell@nebraska.gov . New plans and modifications will be posted at www.dol.nebraska.gov .
June 20, 2014	NWIB meets and makes recommendation to Governor
June 2014	Governor approves local plans and WIB Recertifications before July 1, 2014
June 2014	Approved, fully executed, and signed plans are distributed to: <ul style="list-style-type: none">• Submitting Agency• NE Dept. of Labor – Office of Finance• NE Dept. of Labor – Office of Employment and Training• Posted on NDOL website
July 1, 2014	Program Year 2014 begins

II. ELECTRONIC SUBMISSION

The Local Plan and all of the required attachments and charts must be submitted electronically. The Local Plan must be formatted consistent with the plan content outlined on pages **7 – 16** of these instructions. A website established by the State will allow each local area to upload their local plan and all required attachments.

Access to the website will be restricted and will require a password that will be provided to local area administrative staff. The password will have an effective date and an expiration date, to protect the integrity of the information uploaded to the website. The website will be available on **March 14, 2014**, to allow each local area to upload their local plan and attachments by the April 7, 2014 deadline. New passwords will be assigned.

The Local Plan must be uploaded as a Word document, to allow for electronic tracking of review comments. The “Local Plan” content is considered material covered in section VI (pages **7 – 16**) of these instructions.

- The file name of the Word document that is uploaded must include the name of the local area. This will ensure a file does not override another file with the same name.
(Examples: “Greater Lincoln, Local Plan 2015,” “GL – Local Plan 2015,” etc.)

Attachments to the local plan may be uploaded as Word documents, Excel documents, PDFs, or other types of documents.

- Each attachment must include on the first line of the actual document the letter identifying it, typed or written in the upper right corner, so it is easily identifiable when/if printed in hardcopy.
- The title of each Attachment must correspond to the titles used in this policy and must also include the name of the local area within the title of the electronic file
(Examples: “Greater Lincoln – Attachment A, Assurances,” or “GL – Attachment O – GEO Agreement,” or Gr. Lincoln, Attachment R, Signature Sheet,” etc.)

III. PUBLICATION

The local board must provide an opportunity for public comment on, and input into, the development of the local Workforce Investment plan prior to submission. The opportunity for public comment on the local plan must include:

- 1) Copies of the proposed local plan available to the public through such means as public hearings, local news media and electronic availability (i.e. website—include website address).
- 2) Description of the process used by the local board to provide an opportunity for public comment, including:
 - input into the development of the local plan prior to submission of the plan
 - comments from representatives of business and labor organizations
 - dates posted to website

Documentation (e.g. letters of transmittal) to this effect must be kept on file.

- 3) A 30-day comment period beginning on the date the proposed plan is made available, prior to its submission to the Governor.
- 4) Consistency with the requirement in Sec. 117(e) that the local board make information about the plan available to the public on a regular basis through open meetings (Sunshine provision).

“The local board shall make available to the public, on a regular basis through open meetings, information regarding the activities of the local board, including information regarding the local plan prior to submission of the plan...”

The local board **must** submit any comments that express disagreement with the plan to the Governor along with the plan. The plan must be jointly submitted by the local Workforce Investment Board and the Chief Elected Official to the Nebraska Department of Labor, Office of Employment and Training.

IV. MODIFICATIONS AND REVISIONS

Refer to the State Policy, *Local Plan Modifications and Revisions*, posted on Nebraska Department of Labor’s website, www.dol.nebraska.gov.

V. ASSURANCES

The plan will contain a signed assurance section including the assurances listed in the Attachments section.

VI. LOCAL PLAN DEVELOPMENT PROCESS AND CONTENTS

“The Workforce Investment Act (WIA) of 1998 created dramatic changes to the public workforce system. The overarching goal was to streamline, consolidate, and integrate a wide array of employment and training programs. Because of this, system changes have spanned every facet of operation, including governance, administration and funding, and service delivery. However, while the vision of WIA is for an integrated workforce investment system, many barriers remain and need to be addressed.” During Program Year 2014, there are significant opportunities to “train people for jobs” and move the local workforce system to the next level of transformation, i.e., developing and implementing talent development strategies that support economic growth in regional economies.

The Workforce Investment Act requires the board of each local workforce investment area, in partnership with the appropriate chief elected official, to develop and submit a comprehensive local plan to the Governor which identifies and describes policies, procedure and local activities that are consistent with the state plan. The Local Plan must be formatted consistent with the plan content as outlined below. The Local Plan consists of the plan content and required attachments.

A. 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.

2. Analysis of Local Economic and Labor Market

The Workforce Investment 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.
- 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.
- 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.
- d. Provide an analysis of the challenges associated with the local area's population attaining the education, skills, and training needed to obtain employment.
- e. Describe specific strategies the local WIB 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.

3. Plan Development

Describe the steps for developing the local plan, including:

- a. Timeline
- b. Consultation process with the local elected official(s), local Workforce Investment 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.

B. ADMINISTRATIVE SECTION

The administrative section of the local plan must address each area listed below in the format provided.

1. Organization

a. Chief Elected Official

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

b. Workforce Investment Board

- 1) Describe the structure, including the nomination process, of the Workforce Investment Board (WIB). A current agreement between the chief elected official and the WIB, a WIB member list, and current WIB By-Laws are required attachments of the final local plan.
- 2) Describe how the business members of the WIB play a leading role in ensuring the workforce system is demand-driven.
- 3) Identify the circumstance which constitutes a conflict of interest for any local Workforce Investment Board member.

- 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.
- 5) Describe how the local WIB shall coordinate and interact with the local elected official(s).
- 6) Explain how the local WIB shall ensure nondiscrimination and equal opportunity.
- 7) Explain what strategies the CEO and local WIB shall create to utilize the leadership of faith-based and neighborhood partnerships.
- 8) Describe the intended waiver process (if any) to be used by the local WIB using the criteria by which the state shall determine if local WIBs may provide programs in-house.

c. Administrative Entity

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

2. 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 WIB and Chief Elected Official in the past 12 months.
- b. Identify "action steps" the local WIB and delivery system will take to contribute to reaching the local vision, goals, and priorities.

3. The One-Stop System

The establishment of a One-Stop delivery system is a cornerstone of the reforms contained in Title I of WIA. 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 WIA. Describe the One-Stop delivery system in the local Workforce Investment 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.
- b. Describe the appeals process to be used by entities not selected as the American Job Center operator.
- c. Identify the policy and procedures for certification of the comprehensive American Job Center site.
- d. Outline procedures for decertification of American Job Center(s) and/or service providers.

- 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.
- 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.
- g. Describe how the Workforce Investment Board shall engage employers and organized labor in the One-Stop delivery system.
- h. Describe services offered to businesses.
- 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 non-traditional 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 WIB shall ensure physical and programmatic accessibility for individuals with disabilities at American Job Centers.
- j. Describe any innovative initiatives or service delivery strategies.
- k. Identify the case management system to include what the system will consist of and how it will be implemented
- l. Identify how the local area has implemented electronic case files on new enrollments since July 1, 2012.
- 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.
- n. Identify an operating budget or cost allocation plan for each WIB certified comprehensive American Job Center including the amount and the type of funding of each American Job Center partner.
- 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 WIB to address these gaps.
- 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.

4. Memorandum Of Understanding (MOU)

A Memorandum of Understanding (MOU) shall be developed and signed between the WIB, 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 Investment Board, and the State agency head responsible for administering the partner's program.

In turn, the Governor or the State Workforce Investment 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.

5. Fiscal Controls And Reporting

Each local plan must:

- a. Identify the fiscal agent or entity responsible for the disbursement of grant funds.
- b. Describe the fiscal system and controls used by the fiscal agent for administering WIA funds. Explain measures taken to ensure funds are expended in a timely fashion.
- 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 WIA including how potential bidders are being made aware of grants and contracts.
- d. Describe the procurement process for purchasing goods and services in the local area.
- e. Identify (if applicable) the process to be used to procure training services that are made as exceptions to the Individual Training Account process.
- f. Identify what system will be used to collect data, track and report local performance measures and program activity.
- g. Describe the fiscal agent's property management system.
- h. Describe system/mechanism that will be included for consumer reports.
- i. Acknowledge the requirement of submitting an annual report to the Nebraska Workforce Investment 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.

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

6. 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)]

- a. Identify the plan for conducting monitoring of sub-recipients.
- b. Address how the Local WIB shall be engaged in oversight activities.
- c. Describe evaluation tools used to assess effectiveness of services to customers and ensure continuous improvement of the One-Stop delivery system.

C. OPERATIONAL SECTION

The operational section of the local plan must address each area listed below in the format provided.

1. Services

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 WIA 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.
- b. Eligibility for dislocated worker services.
- 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?
- d. Eligibility – Verification of Lawful Presence.
- e. Definition of "face serious barriers to employment."
- f. Definition of "deficient in basic literacy skills."
- g. Definition of "requires additional assistance to complete an educational program or to secure and hold employment."
- h. Criteria used to determine "in need of training services."
- i. Criteria to demonstrate "skills and qualifications to successfully complete the selected training program."
- 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.
- 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.

Adults and Dislocated Workers

A. Core and Intensive 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.
- 2) Explain if the WIB will provide core or intensive services based on community need and/or state criteria.
- 3) Describe in detail the type and availability of intensive services and how they will be delivered to adults and dislocated workers who qualify. As part of the Case Management process, local areas are encouraged to utilize "The Self-Sufficiency Standard for Nebraska" data prepared for the Nebraska Appleseed Center for Law in the Public Interest.
- 4) For individuals receiving intensive services, describe the criteria set by the local board that determines whether employment leads to self-sufficiency and the relationship of self-sufficiency and local WIA performance achievement. NOTE: For dislocated workers, the rule allows self-sufficiency to be defined in relation to a percentage of the layoff wage.
- 5) 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.

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.
 - a. Discuss implementation of the fifty percent requirement for initiating adults and dislocated workers into training for a high-demand, high wage and high-skill occupation.
 - b. Explain how WIA 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.
- 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.
- 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.
- 4) Describe the local appeals procedure for providers in conjunction with the state appeals procedure for providers denied approval by the WIB. The local appeals procedure is a required attachment to the final Plan.
- 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.

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.

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.

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 Deliver/Service Strategy
1)		
2)		
3)		
4)		
5)		
6)		
7)		
8)		
9)		
10)		

- b. Explain how eligible applicants who do not meet enrollment requirements of a particular program will be referred for further assessment and appropriate programs.
- 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.
- d. Describe the measures taken by the local area to ensure compliance with applicable safety and child labor laws.
- 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.
- 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 WIB and youth council and include, but not be limited to, the state minimal criteria.
- 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.
- 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.
- i. Describe the local appeals procedure for providers in conjunction with the state appeals procedure for providers of youth activities denied approval by the WIB.
- 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."

2. 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 WIB for measuring the performance of the

- local fiscal agent (where appropriate), eligible providers, and the One-Stop delivery system.
- b. Describe current methods for measuring customer satisfaction.
- c. Describe how the local area's service strategy is designed to meet WIA performance.

3. 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.
- b. Provide a copy of the administrative entity's EO policy statement. The EO Policy Statement is a required attachment to the final plan.
- 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.
- 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.

4. Continuous Improvement

- a. Provide a description of how the local WIB will ensure the continuous improvement of eligible providers of services and ensure that such providers meet the employment needs of local employers and participants.
- b. Describe efforts to continuously improve in meeting performance.

VII. REQUIRED ATTACHMENTS

The following documents must be submitted as attachments to the local plan and may be uploaded as Word documents, Excel documents, PDFs, or other types of documents. See section II. Electronic Submission (page 6) for specific instructions on titling and labeling the required attachments.

The required attachments are:

- A. Signed Assurances
- B. Budget, Participant, and Exit Summary Form – Adult
- C. Budget, Participant, and Exit Summary Form – Dislocated Worker
- D. Budget, Participant, and Exit Summary Form – Youth
- E. Budget Summary - Administration
- F. Local Area Participant Appeals Procedure
- G. CEO Agreement
- H. CEO/WIB Agreement

- I. Local Area Complaint and Grievance Policy and/or Procedure
- J. Local Area Customized Training Policy and/or Procedure
- K. Local Area Equal Opportunity Policy Statement
- L. Local Area Individual Training Account Policy
- M. Memorandums of Understanding
- N. Local Area On-the-Job Training Policy and/or Procedure
- O. Proof of Publication of the Public Notice
- P. Public Comments on Plan
- Q. Local Area Rapid Response Procedure
- R. Signature Sheet
- S. Local Area Supportive Services Policy
- T. WIB By-Laws
- U. WIB Membership List
- V. Youth Council Membership List
- W. WIA Grant Agreement with NDOL

Assurances

The purpose of distinguishing the following assurances is to highlight specific requirements and does not limit local area responsibilities in any way. Local areas are required to ensure the local area and its subrecipients are held accountable to all state and federal laws, regulations, and policies. By signing the following assurances, the local area assures the state that the local area and all of its subrecipients will abide by the following requirements:

Access to Records - The Grantee assures it will give the Department of Labor or its representatives the access to, and the right to, examine all documents related to the grant agreement.

Administration - The Grantee assures it will fully comply with all Grantor instructions relating to the administration of the grant funds.

Administration and Fiscal Systems - The Grantee assures it has adequate administrative and fiscal systems necessary to promote effective use of the grant funds. This includes a financial management system that satisfactorily accounts for and documents the receipt and disbursement of all WIA funds including information pertaining to subgrants and contract awards, obligations, unobligated balances, assets, expenditures, and income. Effective internal controls are in place to safeguard assets and assure their proper use (including property location and usage). All source documentation will be maintained to support accounting records that will permit the tracking of funds to a level of expenditure adequate to establish that funds have not been used in a violation of the applicable restrictions on the use of such funds.

Audit Resolution File - Assures the local area will maintain an audit resolution file documenting the disposition of reported questioned costs and corrective actions taken for all findings.

Bonding - All persons and/or subrecipients who are authorized to receive or deposit WIA funds, or to issue financial documents, checks, or other instruments of payment for WIA program costs, will be bonded in accordance with federal and state regulatory requirements for protection against loss.

Cash Management - No excess cash will be kept on hand, and procedures exist for maintaining and monitoring the minimum amount of cash on hand necessary to efficiently improve the timing and control of disbursements.

Compliance with LB 403 Lawful Presence in the U.S. - The Grantee assures all contracts shall certify that the Contractor has registered with and is using a federal immigration verification system as defined in section 7 of Nebraska Laws 2009, LB 403 to determine the work eligibility status of all new employees physically performing services within the State of Nebraska. Upon reasonable notice, the Contractor shall provide documentation to the Department of Labor which proves the Contractor is or was at all times during the term of the agreement in compliance with this provision. If the Contractor is an individual or sole proprietorship, the Contractor shall complete the U.S. Citizenship Attestation Form, available on the Department of Administrative Services Website at www.das.state.ne.us. If the Contractor indicates on such attestation form that he or she is a qualified alien, the Contractor shall agree to provide the U.S. Citizenship and Immigration Services documentation required to verify the Contractor's lawful presence in the U.S. using the Systematic Alien Verification for Entitlements (SAVE) Program. The Contractor

understands and agrees that lawful presence in the U.S. is required and the Contractor may be disqualified or the contract terminated if such lawful presence cannot be verified.

Compliance with WIA - The Grantee assures that it will fully comply with the requirements of PL 105-220, the Workforce Investment Act of 1998, and all Federal regulations pursuant to the Act.

Confidentiality – The Grantee assures it will comply with the confidentiality requirements of section 136(f)(3).

Consultation - The Grantee has developed this plan in consultation with local elected officials, the local Workforce Investment Board, the business community, labor organizations, and other partners.

Demand Occupations - WIA training shall be provided only for those occupations for which there is a demand in the area served, or in another area to which the customer is willing to relocate.

Disabilities - The Grantee assures it will comply with Section 504 of the Rehabilitation Act of 1973 and the American's with Disabilities Act of 1990.

Expending Funds - The Grantee assures funds will be spent in accordance with the Workforce Investment Act and the Wagner-Peyser Act and their regulations, written Department of Labor guidelines, and all other applicable federal and state laws.

Governor's Grant Procedures - The Grantee assures it will comply with the grant procedures prescribed by the Governor that are necessary to enter into grant agreements for the allocation and payment of funds under the Act. The procedures and agreements will be provided by the Governor and will specify the required terms, conditions, assurances, and certifications, including, but not limited to, the following:

General Administrative Requirements:

- 29 CFR part 97 – Uniform Administrative Requirements for State and Local Governments (as amended by the Act)
- 29 CFR part 96 (as amended by OMB Circular A-133) – Single Audit Act
- OMB Circular A-87 - Cost Principles (as amended by the Act)

Assurances and Certifications:

- SF 424 B - Assurances for Non-construction Programs
- 29 CFR part 37 – Nondiscrimination and Equal Opportunity Assurance (and regulation) 29 CFR § 37.20
- CFR part 93 - Certification Regarding Lobbying (and regulation)
- 29 CFR part 98 - Drug Free Workplace and Debarment and Suspension Certifications (and regulation)

Special Clauses/Provisions:

Other special assurances or provisions as may be required under Federal law or policy, including specific appropriations legislation, the Workforce Investment Act, or subsequent Executive or Congressional mandates.

Grievances/Complaints - The Grantee will comply with federal, state, and local procedures for grievances and complaints from participants and employees under the WIA program.

Licensing, Taxation, and Insurance - The Grantee assures it will comply with federal, state, or local laws governing applicable licensing, taxation, and insurance requirements.

Nondiscrimination - The Grantee assures it will comply with the nondiscrimination and equal opportunity provisions of Section 188 and its implementing regulations at 29 CFR Part 37, Title VI

of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and maintain data necessary to show compliance.

Regional Planning - The WIB will participate in regional planning.

Reporting - The Grantee shall submit complete, accurate, and timely reports as specified by the Governor.

Responsibility Matters - The Grantee shall enforce standards and procedures to ensure against fraud and abuse, including standards and procedures against nepotism, conflicts of interest, lobbying, kickbacks, drug-free workplace, political patronage (Hatch Act) and provisions which govern debarment, suspension, and other responsibility matters.

Retention of Records - The Grantee assures it will retain all financial and program records, books of account, and other documents related to the grant agreement for a period of three years. If prior to the expiration of the 3-year retention period, any litigation or an audit has begun, the records, books of account, and documents relating to the grant agreement will be retained until the litigation is complete and audit findings are resolved.

Salary and Bonus Limitation – The Grantee assures none of the funds appropriated in Public Law 109-149 or prior Acts under the heading “Employment and Training Administration” that are available for expenditure on or after June 15, 2006, shall be used by a recipient or subrecipient of such funds to pay the salary and bonuses of an individual, either 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. This limitation shall not apply to vendors providing goods and services as defined in OMB Circular A-133.

Sunshine Provision - The local WIB assures the public, including individuals with disabilities, has access to local WIB meetings and information regarding local WIB activities, including membership and meeting minutes.

Uniform Administrative Requirements - The Grantee assures it will establish, in accordance with Section 184 of the Workforce Investment Act, procedures that ensure compliance with the uniform administrative requirements for grants and agreements applicable to the type of entity receiving funds.

Union Organizing – The Grantee assures no funds received under the Workforce Investment Act will be used to assist, promote, or deter union organizing.

Veterans – The Grantee assures it will comply with the veterans’ priority provisions established in the Jobs for Veterans Act.

Local WIB CHAIRPERSON

LOCAL CHIEF ELECTED OFFICIAL

Signature

Date

Signature

Date

BUDGET, PARTICIPANT, AND EXIT SUMMARY – AdultProgram Area Adults (Training Funds - 90%)

Issuance No. _____

Program Period _____

Additional
and/or
Transferred
Funds**I. Funds Available**

- A. Program (90%)
 B. Additional/Transfer
 C. Additional/Transfer
 D. Additional/Transfer

E. Total Funds

1. Carry In Funds	2. PY Funds (July – Sept.)	3. FY Funds (Oct – June)	4. Name/Year Effective Date	5. Total Available Funds

II. Projected Costs

- A. Participant Costs
 B. Staff Costs
 C. Operational Costs
 D. Equipment Costs

E. Total Projected

III. Projected Carry-In
(to next Program Year)

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IV. Actual Expenditures

- A. Program

1. 1st Qtr (July-Sept.)	2. 2nd Qtr (Oct.-Dec.)	3. 3rd Qtr (Jan.-March)	4. 4th Qtr (April-June)	5. Cumulative Total

V. Participants

- A. Prior Year Carry-In
 B. New Enrollees

1. 1st Qtr (July-Sept.)	2. 2nd Qtr (Oct.-Dec.)	3. 3rd Qtr (Jan.-March)	4. 4th Qtr (April-June)	5. Cumulative Totals	6. Carry-In to Next PY

VI. Exits

- A. Planned Exits
 B. Entered Employment

Projected Cost per Participant #DIV/0!
 For Current Year

Actual Cost per Participant #DIV/0!
 For Previous Year

BUDGET, PARTICIPANT, AND EXIT SUMMARY – DLW

Program Area DLW (Training Funds - 90%) Issuance No. _____
 Program Period _____

				Additional and/or Transferred Funds	
	1. Carry In Funds	2. PY Funds (July – Sept.)	3. FY Funds (Oct – June)	4. Name/Year Effective Date	5. Total Available Funds
I. Funds Available					
A. Program (90%)					
B. Additional/Transfer					
C. Additional/Transfer					
D. Additional/Transfer					
E. Total Funds					

II. Projected Costs

A. Participant Costs					
B. Staff Costs					
C. Operational Costs					
D. Equipment Costs					
E. Total Projected					

III. Projected Carry-In
(to next Program Year)

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IV. Actual Expenditures

A. Program					
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1. 1st Qtr (July-Sept.)	2. 2nd Qtr (Oct.-Dec.)	3. 3rd Qtr (Jan.-March)	4. 4th Qtr (April-June)	5. Cumulative Total

V. Participants

A. Prior Year Carry-In
 B. New Enrollees

1. 1st Qtr (July-Sept.)	2. 2nd Qtr (Oct.-Dec.)	3. 3rd Qtr (Jan.-March)	4. 4th Qtr (April-June)	5. Cumulative Totals	6. Carry-In to Next PY

VI. Exits

A. Planned Exits
 B. Entered Employment

Projected Cost per Participant #DIV/0!
 For Current Year

Actual Cost per Participant #DIV/0!
 For Previous Year

BUDGET, PARTICIPANT, AND EXIT SUMMARY – Youth

Program Area	Program Period

Youth (90%)

Issuance No.

			Additional Funds	
	1. Carry In Funds	2. PY Funds	3. Program/ Year Effective Date	4. Total Available Funds
<u>I. Funds Available</u>				
A. Program (90%)				
B. Additional Funds				
C. Additional Funds				
D. Additional Funds				

II. Projected Costs

A. Out of School Youth

1. Participant Funds
2. Staff Costs
3. Operational Costs
4. Equipment Costs

[illegible]

B. In School Youth

1. Participant Funds
2. Staff Costs
3. Operational Costs
4. Equipment Costs

III. Projected Carry-In Funds

(to next Program Year)

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IV. Actual Expenditures

- C. Total Expenditures**

1. 1st Qtr (July-Sept.)	2. 2nd Qtr (Oct.-Dec.)	3. 3rd Qtr (Jan.-Mar.)	4. 4th Qtr (April-June)	5. Cumulative Total

V. Participants

- A. Prior Year Carry-In
- B. New Enrollees
 - 1. Low Income/ Econ. Disadvantaged
 - 2. High School Dropouts/ No GED
 - 3. Unemployed
 - 4. Out of School
 - 5. In School

1. 1st Qtr (July-Sept.)	2. 2nd Qtr (Oct.-Dec.)	3. 3rd Qtr (Jan.-Mar.)	4. 4th Qtr (April-June)	5. Cumulative Totals	6.

VI. Exits

- A. Exits
 - 1. Placement in Empl. / Educ.
 - 2. Attain Degree / Certificate
 - 3. Literacy/Numeracy Gains

Projected Cost per Participant #DIV/0!
For Current Year

Actual Cost per Participant #DIV/0!
For Previous Year

BUDGET SUMMARY – Administration

Program Area Administration (10%) Issuance No. _____
 Program Period _____

				Other Funds	
I. Funds Available	1. Carry In Funds	2. PY Funds (July – Sept.)	3. FYFunds (Oct – June)	4. Source	5. Total Available Funds
A. Adult					
B. DLW					
C. Youth					
D. Total Funds					
II. Projected Costs					
A. Staff Costs					
B. Overhead Costs					
C. Total Projected					
III. Projected Carry-In (to next Program Year)					
IV. Actual Expenditures	1st Qtr PY (July-Sept.)	2nd Qtr FY (Oct.-Dec.)	3rd Qtr (Jan.-Mar.)	4th Qtr (April-June)	Cumulative Totals
A. Administration					

INSTRUCTIONS FOR THE BUDGET, PARTICIPANT, AND EXIT SUMMARY SHEETS—Adults & Dislocated Workers

The correct Issuance number and Program Period must be completed. If an Issuance is not applicable, indicate "N/A." Program Period must be completed, and include Program and Fiscal Year. The Budget, Participant, and Exit Summary sheet should only reflect program costs (90% funds) and no administrative costs (10%).

I. Funds Available

Under the Funds Available section:

- **Column 1** should reflect the estimated carry-in funds from the previous year.
- **Column 2** should reflect the Program Year (PY), July through September funds the local area will receive. This amount should match the amount provided for planning purposes in the State Issuance.
- **Column 3** should reflect the Fiscal Year (FY), October-June funds the local area will receive. This amount should also match the amount provided for planning purposes in the State Issuance.
- **Column 4** is to be used when transferring funds between adult and dislocated workers. In the header column, the local area will need to identify the Name (i.e. PY or FY) and the Effective Date which is the program or fiscal year the funds were initially awarded to the State. When transferring funds the original funds source should be displayed as a negative and the receiving funding source should be displayed as a positive.
- **Column 5** is the total of Columns 1, 2, 3 and, if applicable, 4.

II. Projected Costs

Under the Projected Costs section, staff costs are salary and benefit cost that will be charged to the adult program and operational costs are those expenses needed to operate the adult program (i.e. all cost related to the program that are not a personnel cost such as; rent, utilities, publications and printing, travel, etc.). :

- **Column 1** should reflect the amount of carry in funds that will be spent on participant costs, staff costs, operational costs, and equipment costs.
- **Column 2** should reflect the amount of Program Year funds that will be spent on participant costs, staff costs, operational costs, and equipment costs.
- **Column 3** should reflect the amount of Fiscal Year funds that will be spent on participant costs, staff costs, operational costs, and equipment costs.
- **Column 4** should identify any participant, staff, operational, or equipment costs that will be charged to additional or transferred funds.
- **Column 5** should be the total of Columns 1-3 and, if applicable, 4, for participant, staff, operational, and equipment costs.

III. Projected Carry-In

In this section the local area should indicate the planned amount to be carried in for the following program year.

- **Column 1** should be left blank.
- **Columns 2-3** and, if applicable, 4, should be totaled and reflected in Column 5.

IV. Actual Expenditures

This section only needs to be completed when the local plan is being modified or revised after the beginning of the program year. Depending on the quarter of the program year the modification is submitted, the local area needs to complete in the appropriate column (1-4), the actual per quarter expenditures for the quarters completed to date.

- Column 5 should reflect the total of columns 1-4 as appropriate.

V. Participants

- **Columns 1-4** of this section should show the planned number of new enrolled participants per quarter. Each column should only show the number of **new** enrollees per quarter.
- **Column 1** reflects both the number of prior year carry-in participants and the new enrollees for 1st quarter.
- **Column 5** is the annual cumulative total over a four quarter period which includes the prior year carry-in shown in Column 1 and the addition of Columns 1-4 of new enrollees.
- **Column 6** needs to show the number of planned participants to be carried into the next program year.

VI. Exits

- **Columns 1-4** – The number of planned Exits per quarter should be shown in Columns 1-4. Of the planned Exits, Columns 1-4 also asks how many will enter employment.
- **Column 5** is the cumulative total of Exits over a 4 quarter period and of those exited how many will enter employment

VII. Projected Cost Per Participant is the planned average cost per participant for the program period. **Actual Cost Per Participant** is the local area's average cost per participant for the previous program year.

INSTRUCTIONS FOR THE BUDGET, PARTICIPANT, AND EXIT SUMMARY SHEETS – YOUTH

The correct Issuance number and Program Period must be completed. If an Issuance is not applicable, indicate "N/A." Program Period must be completed, and include Program and Fiscal Year. The Budget, Participant, and Exit Summary sheet should only reflect program costs (90% funds) and no administrative costs (10%).

I. Funds Available

Under the Funds Available section:

- **Column 1** should reflect the estimated carry-in funds from the previous year.
- **Column 2** should reflect the Program Year (PY), July through June funds the local area will receive. This amount should match the amount provided for planning purposes in the State Issuance.
- **Column 3** should reflect any additional youth funds the local area may receive. In the header of Column 3, the local area will need to identify the source of the additional funds and the Effective Date which is the program or fiscal year the funds were initially awarded to the State.
- **Column 4** is the total of Columns 1, 2 and 3, if applicable.

II. Projected Costs

The Projected Cost section has two parts; A. Out of School Youth, and B. In School youth. For the purpose of this section, staff costs are salary and benefit cost that will be charged to the youth program and operational costs are those expenses needed to operate the youth program (i.e. all cost related to the program that are not a personnel cost such as; rent, utilities, publications and printing, travel, etc.).

- **Column 1** should reflect the amount of carry in funds that will be spent on participant costs, staff costs, operational costs, and equipment costs for both A. Out of School Youth and B. In School Youth.
- **Column 2** should reflect the amount of Program Year funds that will be spent on participant costs, staff costs, operational costs, and equipment costs for both A. Out of School Youth and B. In School Youth.
- **Column 3** should reflect any additional funds the local area received that will be spent on participant costs, staff costs, operational costs, and equipment costs. Additional funds must also be identified as either Out of School, In School, or both.
- **Column 4** should be the total cost for participant, staff, operational, and equipment expense (Columns 1-3).

III. Projected Carry-In Funds

In this section the local area should indicate the planned amount to be carried in for the following program year.

- **Column 1** should be left blank.
- **Columns 2-4** should be totaled and reflected in Column 5.

IV. Actual Expenditures

This section only needs to be completed when the local plan is being modified or revised after the beginning of the program year. Depending on the quarter of the program year the modification is submitted, the local area needs to complete, in the appropriate column (1-4), the actual per quarter expenditures for the quarters completed to date. This information must be provided specific to Out of School and In School Youth expenditures.

- **Column 5** should reflect the total of Columns 1-4.

V. **Participants**

- **Columns 1-4** of this section should show the planned number of new enrolled participants per quarter. Each column should only show the number of new enrollees **per** quarter.
- **Column 1** reflects both the number of prior year carry-in participants and the new enrollees for 1st quarter. Of the combined total, A. prior year carry-in and B. new enrollees, indicate how many are planned to be: 1. Low income/economically disadvantaged, 2. High school dropout/ no GED, 3. Unemployed, 4. Out of school and, 5. In school.
- **Column 5** is the annual cumulative total over a four quarter period which includes A. prior year carry-in shown in Column 1 and B. new enrollees in Columns 1-4.
- **Column 6** needs to show the number of planned participants to be carried into the next program year.

VI. **Exits**

- The number of planned Exits per quarter should be shown under A. Exits in **Columns 1-4**.
- Of the planned Exits, **Columns 1-4** also asks per quarter how many will: 1. Be placed in Employment/Education, 2. Attain a degree/certificate, and/or 3. Achieve literary/numeracy gains.
- **Column 5** is the cumulative total of Exits over a four quarter period and a cumulative total of those exited how many plan to: 1. Be placed in Employment/Education, 2. Attain a degree/certificate, and/or 3. Achieve literary/numeracy gains.

VII. Projected Cost Per Participant is the planned average cost per participant for the program period.

Actual Cost Per Participant is the local area's average cost per participant for the previous program year.

INSTRUCTIONS FOR THE BUDGET SUMMARY SHEETS - Administration

This Budget Summary Sheet should only reflect the 10% Administrative set aside funds allowed for administration under the WIA Adult, Youth and Dislocated Worker Programs.

The correct Issuance number and Program Period must be completed. If an Issuance is not applicable, indicate "N/A." Program Period must be completed, and include Program and Fiscal Year. The Budget, Participant, and Exit Summary sheet should only reflect administrative costs (10% funds) and no program costs (90%).

I. Funds Available

Under the Funds Available section:

- **Column 1** should reflect the estimated carry-in funds from the previous year.
- **Column 2** should reflect the Program Year (PY), July through September funds the local area will receive. This amount should match the amount provided for planning purposes in the State Issuance.
- **Column 3** should reflect the Fiscal Year (FY), October-June funds the local area will receive. This amount should also match the amount provided for planning purposes in the State Issuance.
- **Column 4** is to be used when the local area receives any other funds for administration. The local area will need to identify the source of the administrative funds.
- **Column 5** is the total of Columns 1, 2, 3 and, if applicable, 4. This section should only reflect administrative costs (10% funds) and no program costs (90% funds).

II. Projected Costs

Under the Projected Costs section, staff costs are salary and benefit cost that will be charged to administrative funds and overhead costs are those expenses needed to support administrative functions (i.e. all cost related to the program that are not a personnel cost such as; rent, utilities, publications and printing, travel, etc.):

- **Column 1** should reflect the amount of carry in funds that will be spent on: A. staff costs and B. overhead costs.
- **Column 2** should reflect the amount of Program Year funds that will be spent on staff costs and overhead costs.
- **Column 3** should reflect the amount of Fiscal Year funds that will be spent on staff costs and overhead costs.
- **Column 4** should identify any administrative costs (staff or overhead) the local area may receive.
- **Column 5** should be the total of Columns 1-4 for participant, staff, operational, and equipment costs.

III. Projected Carry-In

In this section the local area should indicate the planned amount to be carried in for the following program year.

- **Column 1** should be left blank.
- **Columns 2-4** should be totaled and reflected in Column 5.

IV. Actual Expenditures

This section only needs to be completed when the local plan is being modified or revised after the beginning of the program year. Depending on the quarter of the program year the modification is submitted, the local area needs to complete in the appropriate column (1-4), the actual per quarter expense for the quarters completed to date.

- Column 5 should reflect the total of columns 1-4 as appropriate.