



## LOCAL PLAN REQUIREMENTS PI 20-07

Local Plans serve as four-year action plans to develop, align, and integrate service delivery strategies and to support the state's vision and strategic and operational goals. The Local Plan sets forth the strategy to:

- Direct investments in economic, education, and workforce training programs to focus on providing relevant education and training to ensure that individuals, including youth and individuals with barriers to employment, have the skills to compete in the job market and that employers have a ready supply of skilled workers.
- Apply job-driven strategies in the One-Stop system.
- Enable economic, education, and workforce partners to build a skilled workforce through innovation in, and alignment of, employment, training, and education programs.
- Incorporate the Local Plan into the Regional Plan per 20 Code of Federal Regulations (CFR) 679.540.

Section 108(b) (1) through (22) of the WIOA requires local boards and CEOs to develop and submit a comprehensive four-year Local Plan that is consistent with the State Plan and based on an analysis of regional labor market data. The Local Plan shall include the following:

### 1. An analysis of regional labor market data and economic conditions including:

- The regional analysis prepared as part of the Regional Plan.

The information provided below reflects the data as we knew it before the COVID pandemic significantly impacted economic conditions in March of 2020. We will continue to monitor labor market information in the months to come and make the appropriate pivots as new data emerges, and we begin to understand the new workforce needs.

Current Labor Market information (LMI) for West Michigan, provided by the DTMB, Bureau of Labor Market Information and Strategic Initiatives, and Quarterly Census of Employment and Wages (QCEW), shows that Construction and Manufacturing, along with Professional and Business Services are leading all industries in talent needs and that Education and Health Services, Transportation and Utilities, along with Leisure and Hospitality are following slightly behind.

Table 8 - Private Industry Employment Trends – 2013 - 2019

INDUSTRY	SECOND QUARTER 2013	SECOND QUARTER 2015	SECOND QUARTER 2017	SECOND QUARTER 2019	2013–2019 NUMERIC CHANGE	2013–2019 PERCENT CHANGE
<b>Total Employment</b>	578,849	618,904	655,957	677,081	98,232	17.0%
Construction	23,789	27,172	30,648	33,133	9,344	39.3%
Education and Health Services	95,107	100,584	106,548	110,004	14,897	15.7%
Financial Activities	26,607	26,296	27,772	28,591	1,984	7.5%
Information	6,282	6,091	6,346	6,445	163	2.6%
Leisure and Hospitality	59,611	62,547	65,701	67,625	8,014	13.4%
Manufacturing	134,980	145,981	154,966	159,962	24,982	18.5%
Natural Resources and Mining	11,183	12,606	12,528	12,062	879	7.9%
Other Services (except Public Administration)	20,533	20,939	21,951	22,945	2,412	11.7%
Professional and Business Services	86,228	93,239	103,349	108,001	21,773	25.3%
Trade, Transportation, and Utilities	113,236	122,701	125,570	127,240	14,004	12.4%

Source: DTMB, Bureau of Labor Market Information and Strategic Initiatives, Quarterly Census of Employment and Wages (QCEW)

High demand occupations within West Michigan’s Construction Industry include job titles such as carpentry, civil engineers, cost estimators, plumbers, heating and air mechanics and installers, and first line managers and laborers.

High demand occupations within West Michigan’s Manufacturing Industry include automotive, aerospace, pharmaceuticals, food production, machinery manufacturing, plastics product manufacturing, and machine shops.

Within the Healthcare industry the job titles include physicians, surgeons, dentists, technicians, registered nurses (RN), licensed practical nurses (LPN), physicians assistants, home health aides and medical assistants. These occupations continue to show regional growth. Michigan Works! West Central and West Michigan Works! are collectively focused on growing the talent pipeline in this area. The Professional occupations include higher skilled and educated positions such as mathematical analysts, architecture, and art and designer.

Agribusiness, the business of agricultural production, can be identified throughout high demand occupations in the Construction, Manufacturing, and Information Technology sectors. With its continuous growth, it is becoming an emerging sector of its own with high demand occupations within West Michigan that include many cross-industry careers. Occupational opportunities include maintenance mechanic, food processing and production, tractor-trailer truck driver, first line supervisors, computer and IT services, and general farm labor.

Jobs in Information Technology span between several industries such as information and professional and business services. Jobs in data processing, hosting and related services indicates grew 167% between 2013 and 2019. Additionally, jobs within computers systems design and custom computer programming services both grew over 25% during the same time frame. High demand positions within the IT industry include software developer, web developer, information security analyst and computer user support."

The Trade, Transportation, and Utilities occupations are also growing and include job titles such as Heavy and Tractor Trailer Truck Drivers, Bus and Truck Mechanics, Material Movers, First Line Supervisors of mechanics, installers and repairers.

Private sector jobs continue to grow overall with the greatest change from 2013 to 2019. West Michigan outperformed the state in private sector job growth in every industry except for Healthcare.

As of the second quarter of 2019, approximately 17,300 jobs were advertised online in West Michigan, according to the Conference Boards' Help Wanted Online Database. This is a decline of 4,300 ads since the 1st quarter 2016. The top job advertisements were for Retail Salespersons with Registered Nurses and Customer Service Representatives close behind.

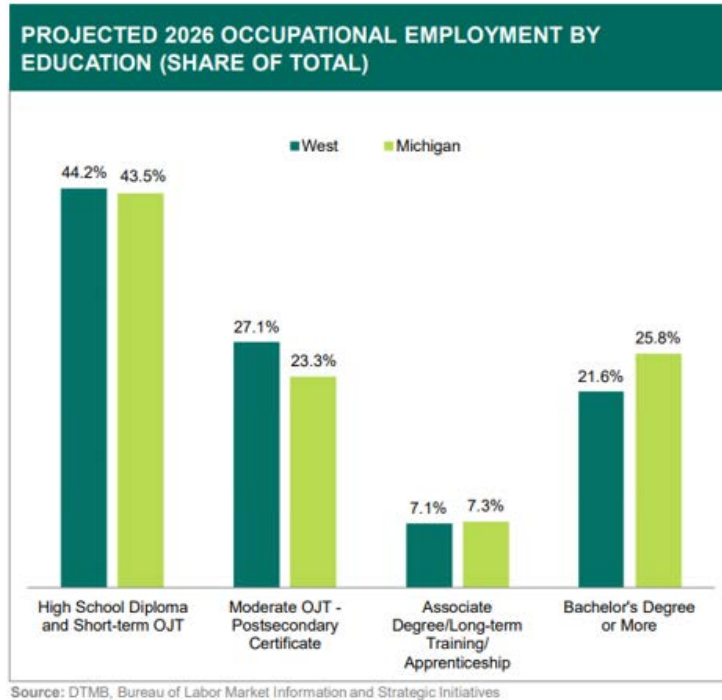
ONLINE ADVERTISED JOB POSTINGS, WEST MICHIGAN	
JOB TITLE	NUMBER
Retail Salespersons	593
Registered Nurses	579
Customer Service Representatives	540
First-Line Supervisors of Retail Sales Workers	472
Sales Rep., Whlsl & Manu., Exc. Tech. & Sci. Prod.	404
Heavy and Tractor-Trailer Truck Drivers	373
Laborers & Freight, Stock, & Material Movers, Hand	318
Managers, All Other	277
Software Developers, Applications	276
Production Workers, All Other	241

Source: The Conference Board, Help Wanted OnLine® Database

- The knowledge and skills necessary to meet the employment needs of the employers in the region, including employment needs of in-demand industry sectors and occupations.

The analysis on the projected occupational growth rates suggests that 44% of West Michigan jobs will require a high school diploma or less with short term or on-the-job- training. Thirty-four percent of the jobs will require an associate degree, post-secondary training, some college with no degree, or a high school diploma or less accompanied with an extensive apprenticeship or on-the-job-training experience. Approximately 21% of the jobs will require a bachelor's degree or higher. These projections mirror with the projections for the State of Michigan overall, however the growth rate in West Michigan will supersede the state's average before arriving at these outcomes. Occupations requiring a bachelor's degree or higher are expected to grow 8.5% from 2016-2026.

This expected growth is 2.5 percentage points greater than the statewide projected growth. High school and short-term on the job training is projected to grow 12.8% during the period.



When comparing high-demand, high-wage jobs with educational requirements, Heavy and Tractor-Trailer Truck Drivers are expected to have the most annual openings according to the Bureau of Labor Market Information and Strategic Initiatives. Software Developers are showing the greatest growth percent with a high median hourly wage. General and Operational Managers are showing the highest wages but the least amount of growth. This completed research confirms that pay level is directly correlated with the level of formal education and/or the length of the job training or apprenticeship.

- An analysis of the current workforce in the region, including employment and unemployment data, labor market trends, and the educational and skill levels of the workforce, including individuals with barriers to employment.

An analysis completed by the State of Michigan’s Department of Technology, Management and Budget Bureau of Labor Market Information and Strategic Initiatives provides the population estimate for West Michigan Prosperity Region 4 was at 1,613,924 people in 2019 (US Census Bureau). This is a 4.1% increase over 2013-2019. While the statewide population showed an increase of only 0.7% the data reflects much of the increase was in Kent County, totaling more than 30,000 new residents. Although West Michigan as a region was growing during this time (2013-2019) Mecosta, Osceola, and Oceana showed the least amount of growth, with counties in Region 4b showing a growth rate higher than the rest of the state.

**Table 1 - Population Trends – 2013 – 2019**

AREA	2013	2015	2017	2019	2013–2019 NUMERIC CHANGE	2013–2019 PERCENT CHANGE
West Michigan Prosperity Alliance	1,549,658	1,571,649	1,596,609	1,613,924	64,266	4.1%
Allegan	112,009	114,112	116,368	118,081	6,072	5.4%
Barry	59,090	59,426	60,682	61,550	2,460	4.2%
Ionia	63,991	64,056	64,284	64,697	706	1.1%
Kent	624,303	637,164	649,278	656,955	32,652	5.2%
Lake	11,396	11,697	11,981	11,853	457	4.0%
Mason	28,668	28,738	28,996	29,144	476	1.7%
Mecosta	43,260	43,005	43,258	43,453	193	0.4%
Montcalm	62,794	62,763	63,527	63,888	1,094	1.7%
Muskegon	172,273	172,447	173,645	173,566	1,293	0.8%
Newaygo	47,869	47,882	48,320	48,980	1,111	2.3%
Oceana	26,298	26,323	26,422	26,467	169	0.6%
Osceola	23,322	23,177	23,267	23,460	138	0.6%
Ottawa	274,385	280,859	286,581	291,830	17,445	6.4%
<b>Michigan</b>	9,913,065	9,931,715	9,973,114	9,986,857	73,792	0.7%
<b>United States</b>	315,993,715	320,635,163	324,985,539	328,239,523	12,245,808	3.9%

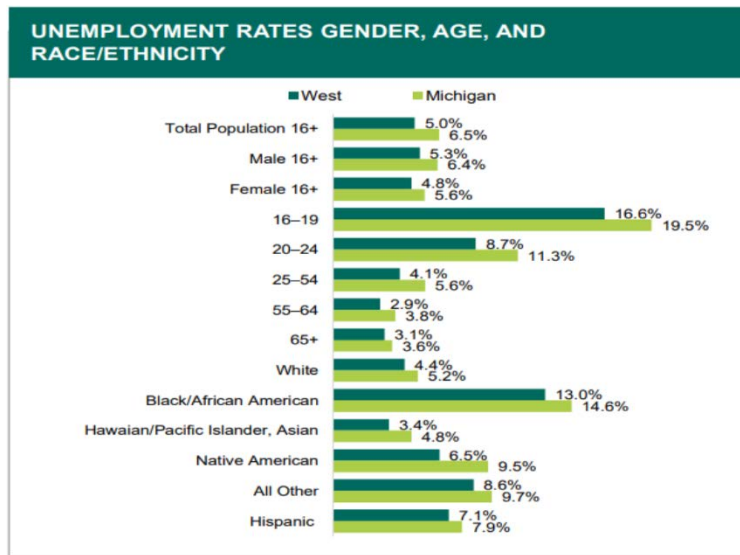
Required: WIOA Act, Section 108, (b), (1), (A)

Source: U.S. Bureau of the Census, Annual Population Estimates

Further research conducted by this same source demonstrates the current workforce trends within Region 4. The data below will provide an accurate analysis of the labor force by demographics and education attainment levels.

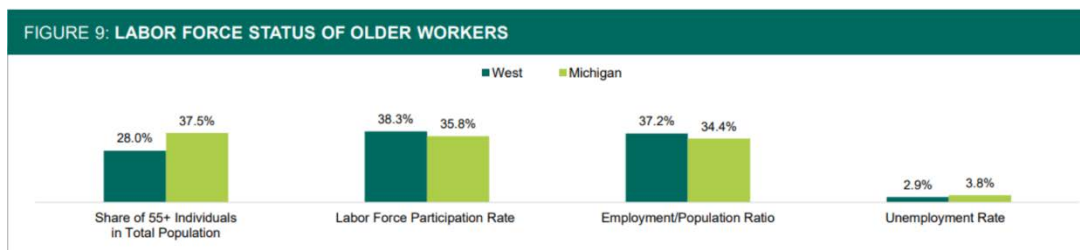
On par with the increase in population, the labor force has also increased for a total workforce population of 833,100. With this increase, the area still maintained unemployment trends that followed both the State of Michigan trends and the United States trends of steady decrease since 2013. From 2013 to 2019, West Michigan went from a 7.2% unemployment rate to a 3.3% unemployment rate landing 0.8% below the Michigan average and 0.4% below the United States average. As of the writing of this plan, West Michigan, along with the rest of the United States is experiencing much higher unemployment rates due to COVID-19 across all industry sectors and demographics.

Looking at jobless rates by demographics, West Michigan experiences rates below the State average in every category except African American and Some Other Race category. Males age 16 and over show a slightly higher unemployment rate than females in the same age category; however, this rate is still below the state average. West Michigan's highest jobless rates are found within the subcategory of males age 16-19 showing almost 17.3%, female age 16-19 showing 16% and Black/African American showing 13%. This rate was 1.6 percentage points less than the rate statewide for African American's.



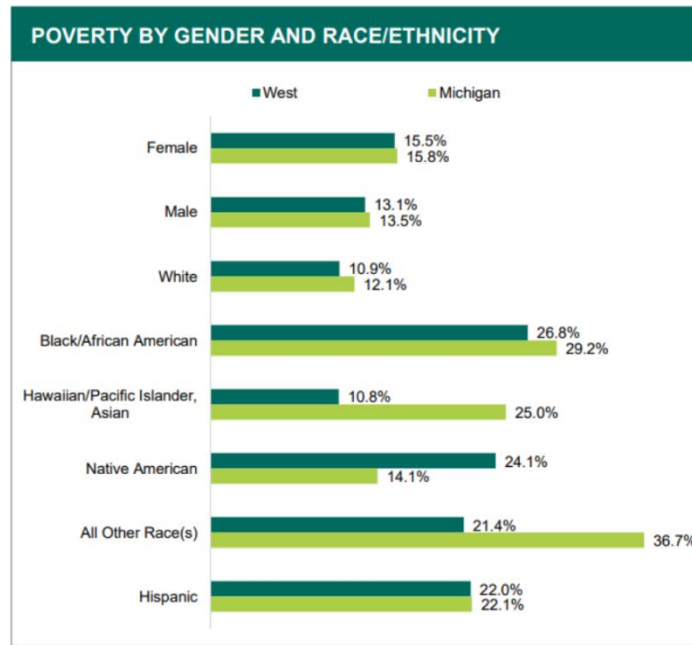
Source: U.S. Census Bureau, 2014-2018 American Community Survey Five-Year Estimates

When looking at the data provided by the U.S. Bureau of the Census, 2012-2016 American Community Survey Five-Year Estimates, the number of older workers staying in the labor market longer in West Michigan is slightly higher than the State average. During 2014-2018, this group has had a 39% workforce participation rate (employed or seeking work). Overall, the total population and labor force rates remain slightly higher than the State average. The jobless rate of older workers in West Michigan is nearly a full percentage point lower than the state rate, at 2.9%.



Source: U.S. Census Bureau, 2014-2018 American Community Survey Five-Year Estimates

Poverty rates for West Michigan are just slightly below the state average with an estimated 14% of residents living below the poverty line. When broken down by demographics, West Michigan is close, but below the State averages in all categories with the biggest exception being Native Americans, which is showing a poverty rate of 10% higher. The data also shows a larger percentage difference in West Michigan between White, 11% falling below the poverty line, and Black/African American, 27% falling below the poverty line.

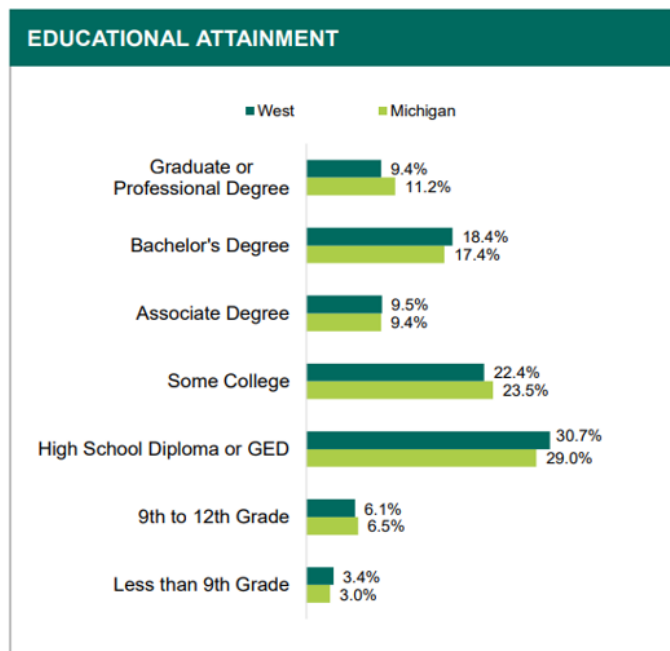


Source: U.S. Census Bureau, 2014-2018 American Community Survey Five-Year Estimates

According to the Michigan Department of Health and Human Services, roughly 31,738 assistance program registrants resided in West Michigan as of June 2019. This number is down by 15,119 individuals since June 2017. Females make up almost 59% of registrations in Michigan. Over 56% of the assistance program registrants were white, while only 19% were Black or African American. This data suggests that the Black or African American population is accessing welfare reform services at a much lower rate.

Individuals with a reported disability account for 198,036 of West Michigan's population. The demographic characteristics are like the State average with the biggest variance being between the white (86%) and Black/African American (7%) populations. The percentage of male and female individuals with disabilities in West Michigan is on par with the State average in both categories with the male to female share in the region being 49% to 51%. Those of Hispanic ethnicity had a higher share (5.9%) in West Michigan than in the state (3.6%).

Educational attainment is based on the number of residents 25 and older. In Michigan, that number represents 1,021,053 residents. Overall, the attainment rate for West Michigan is consistent with the overall state average; however, individuals holding Bachelors' Degrees outperforms the State average by 1% and Individuals with a High School Diploma or GED outperform the State average by almost 2%. The chart below demonstrates the educational attainment levels through 2014-2018 for West Michigan in comparison to the State of Michigan.



Source: U.S. Census Bureau, 2014-2018 American Community Survey Five-Year Estimates

- An analysis of workforce development activities in the region, including available education and training opportunities. This analysis must include the strengths and weaknesses of workforce development activities in the region and the region’s capacity to provide the workforce development activities necessary to address the education and skill needs of the workforce, including individuals with barriers to employment, and the employment needs of employers in the region.

Although West Michigan has experienced population increases, a steady decrease in unemployment rates until the Covid-19 pandemic, and slightly better than state averages in most of the workforce trends, it remains a region in need of intentional workforce development. Given that there are pockets of communities at high rates of poverty and unemployment, both geographically and across specific demographics, WMW is committed to removing barriers to equitable work and opportunities.

WMW is seeking ways to provide better, more relevant services to those currently utilizing the welfare reform or other workforce systems, provide one stop barrier removal services in coordination with existing and newly sought out community partners, analyzing WMW services to determine both access and outcomes across multiple demographics, better prepare individuals to attend various training opportunities, and finding ways to increase the labor force by re-engaging people with disabilities who are otherwise capable of working. Michigan Works! West Central and West Michigan Works! are relentlessly pursuing innovative and relevant solutions to these challenges through unique partnerships and resources to meet individual and employer needs.

Using sector strategies, the Region 4 Michigan Works! agencies continue to convene and connect to enhance the network of partners to meet the demands of the region’s current employers as well as the emerging industry needs in order to achieve a skilled workforce.



Industry Councils have been established within the region to help identify employer needs from the industry-wide perspective. These councils allow for the identification of best practices and shared strategies as well as increased articulation of what areas employers may need in workforce development assistance.

Key roles of each of the industry sector councils include:

- **Information conduit:** sharing trends and best practices affecting talent.
- **Talent Initiatives:** leading, supporting and promoting talent initiatives throughout West Michigan.
- **Training Needs:** sharing current training needs with educational partners to develop curriculum, create career pathways and nurture a supply chain of talent.
- **Networking:** promoting networking among employers, educators, workforce development and economic development professionals for the purpose of developing a skilled workforce.

Educating youth and enhanced outreach activities allows for a better understanding of what the regional economy looks like and what career opportunities are in existence post high school or following postsecondary education. Building the talent pipeline will increase the skilled talent pool and retain young people in our area. [MiCareerQuest](#), a region-wide career exploration event for youth, Jobs for Michigan Graduates (JMG) and the Summer Youth Work Experience Program are all examples of current workforce development activities targeted at increasing the local labor force and addressing the education and skill gaps in our region.

West Michigan is also focused on identifying and advocating to provide more meaningful and efficient services to individuals with disabilities. These initiatives include addressing the infrastructure improvements needed to lessen the barriers brought by housing, transportation, and internet access as well as increasing the training and employment opportunities that are available to this population. Michigan Rehabilitation Services (MRS) is a core partner and a representative are co-located inside many of the Service Centers. In addition, West Michigan has established relationships with Michigan Bureau for Blind Services and Disabilities Advocates. These agencies are sharing resources and are at the table investigating ways to promote common intakes, assessments, and making direct connects to opportunities.

In rural areas or where public transportation is unavailable, support services, such as gas cards or auto repairs, may be provided to assist individuals with getting to and from workforce development activities including education and employment. Though the causes of transportation barriers are different, these barriers exist in both urban and rural areas of the region.

Adult Education and Literacy programs are made available through established and emerging partnerships with local providers. Some of the West Michigan Region 4 Service Centers provide instruction and testing onsite or through direct services. In areas that have expanded resources, community conversations and informational tours are taking place to increase awareness of workforce development services. In some communities, Michigan Works! staff conduct workshops and initiate career coaching as part of the educational curriculum.

Short-term Occupational Skills Training and Higher Education opportunities are also available throughout the region and are funded with local WIOA Adult, Dislocated Worker and Youth allocations for those who qualify, and WMW is committed to finding and using additional funding

in order to best utilize our traditional funding to have a greater impact on our West Michigan communities. Region 4 works closely with training providers to ensure that the supported programs lead to an industry recognized credential and that the credential falls in line with employer demand. Recent initiatives have also shown that training providers including community colleges, are responsive to the development and delivery of a curriculum that directly addresses the skill gaps.

The geographic factors of Region 4 present the greatest weaknesses to both the rural communities and employers. Although some training opportunities are offered online, many are only available in the urban areas making transportation a barrier that often discourages individuals from pursuing Occupational Skill Training or Higher Education. Commuting patterns suggest that many people living in the rural areas are working in urban locations; however there is still a large gap presented for both employers and residents when they are not able to obtain the skills needed to live and work in the same community. Efforts to better assess training needs and accessibility of training programs are being made in collaboration with the West Michigan Industry Councils, Higher Education providers, Vocational Training partners, Michigan Rehabilitation Services (MRS), Adult Education providers, Veterans Services, and other community organizations.

Work-based training is available and is a viable option that allows individuals to learn the skills that employers need without attending an occupational skill based or higher education training. Depending on the desired skill, the training type and the length of the training, this may assist residents with employment opportunities that will require an education attainment of high school diploma through Associate's Degree (approximately 80 % of projected jobs). Work-based training can be funded with local WIOA Adult, Dislocated Worker and Youth allocations and for those who qualify.

Work-based training opportunities include:

- **On-The-Job-Training:** intended to provide a participant with the knowledge and skills necessary for the full performance of the job. OJT is a critical tool that can help job seekers enter successful employment. The term "on-the-job training" means training by an employer that is provided to a paid participant while engaged in productive work in a job that:
  - Provides knowledge or skills essential to the full and adequate performance of the job.
  - Provides reimbursement to the employer of typically 50% and up to 75% of the wage rate of the participant for the extraordinary costs of providing the training and additional supervision related to the training.
  - Is limited in duration as appropriate to the occupation for which the participant is being trained, considering the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.
- **Pre-Apprenticeship Training:** designed to provide work experiences that can help participants obtain the skills needed to be placed into a registered apprenticeship.
- **Registered Apprenticeships:** designed to combine paid learning on-the-job and related technical and theoretical instruction in a skilled occupation. This training is an important component of the education and training services that the workforce system can provide to its participants and should be used as a strategy to train and employ job seekers. Registered

Apprenticeships offer job seekers immediate employment opportunities that usually pay higher wages and offer continued career growth. WMW is committed to creative solutions to increase the number and the diversity of those participating in apprenticeships.

- ***Incumbent Worker Training:*** designed to assist employers with training current workers in specific circumstances to meet the needs of employers and increase the skill level of workers.

West Michigan Works! has built strong relationships with education providers at all levels to ensure quality high demand trainings are accessible to individuals.

- A description of the local board's strategic vision and goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment), including goals relating to performance accountability measures based on primary indicators of performance as described in the WIOA Section 116(b)(2)(A) in order to support regional economic growth and economic self-sufficiency.
- A description of the local board's strategy to align local resources, required partners, and entities that carry out core programs to achieve the strategic vision and goals.

West Michigan Works! is an employer-recognized model of high-quality service that convenes an aligned network of partners, cultivates a skilled workforce, and meets the needs of employers. This strategic vision includes goals for preparing an educated and skilled workforce as well as aligning local resources with required partners to carry out core programs.

The West Michigan Works! Strategic Plan was developed in 2016, shortly after the organization was created through a merger of multiple Michigan Works! agencies to serve a seven-county region. The comprehensive process that resulted in the plan engaged numerous stakeholders, including board members and staff, community partners, education and training providers, economic development, employers, and job seekers. This input was incredibly valuable and ensured a strong plan that launched the newly formed entity, providing strategic direction and focus. After nearly four years and achieving many of the goals set forth in the plan, the plan was updated in the spring of 2020, based on new conditions, and needs among partners and local communities. The revision process also engaged numerous stakeholders, through focus groups and surveys.

The agency's contracted One-Stop Operator (OSO) facilitated this process, evaluating current conditions, collecting, and aggregating input, and identifying new strategic directions. The updated plan builds on the success of the previous four years, leveraging the foundations laid by the board and staff. The Vision, Mission, Values, and Core Competencies are unchanged; however, the Goals and Strategies are more targeted than before, reflecting the specific needs expressed by stakeholders during the input process.

This updated plan reflects the next phase of the organization's forward momentum, building on the progress made to date, and leveraging strengths and opportunities. All goals and strategies are inclusive to serving target populations such as youth and individuals with disabilities. For a list of previous goals and strategies, as well as an assessment of their progress, you can access the strategic plan on our website or [here](#).

## Goals and Strategies

<b>Goal A:</b>	Foster widespread networks to collaboratively address workforce needs in the region.
<b>Goal B:</b>	Expand the local pipeline of work-ready talent to meet the needs of the workforce and of West Michigan employers.
<b>Goal C:</b>	Enhance capacity and increase resources by leveraging strengths, successes, and networks.
<b>Goal D:</b>	Improve engagement across the organization through strategic initiatives, professional development, and a solutions-driven culture.
<b>Goal E:</b>	Enable a culture that honors the worth and dignity of all people, where staff and customers have equitable access to opportunities.

### Customer-Focused Strategies

- 1) Engage opportunity youth with experiences that build occupational awareness and prepare them for career pathways within the local economy. (A, B, D, E)
- 2) Connect with overlooked talent pools through partnership networks and strategic outreach efforts. (A, B, E)
- 3) Expand employability skills training services to new, targeted audiences across the region. (B, C, E)
- 4) Establish and expand services that provide solutions for retention of employees at West Michigan employers. (A, C, E)

### System-Focused Strategies

- 5) Advocate for systems and resources that lessen barriers to success for employers and underserved communities in West Michigan. (A, B, E)
- 6) Maintain career pathways mapping for the region's key industries and serve as the primary resource for pathways information across the region. (A, C)
- 7) Enhance the positive reputation of West Michigan Works! through brand association with workforce resources and opportunities. (A, C, E)

### Capacity-Building Strategies

- 8) Develop mechanisms that enable the organization to capitalize on successful initiatives and pursue different sources of funding. (C, D)
- 9) Develop robust systems for professional development in support of a culture that emphasizes staff diversity and inclusion, training, and empowerment. (D, E)
- 10) Improve communication among staff departments in support of a culture that prioritizes team based approaches and solutions-driven strategies. (D, E)

### Accountability Strategies

- 11) Engage board members in ongoing continuous improvement through subcommittees and workgroups that reinforce strategic priorities. (A, D, E)

12) Conduct annual reviews of service delivery models and execution to ensure equity, consistency, and quality at all West Michigan Works! Service Centers. (A, D, E)

- Expected performance levels may be used to evaluate outcomes until such time as formal performance goals are established.

The negotiated performance goals for Program Years PY20 and PY21 are reflected below.

<b>West Michigan Works!</b>		
<b>Performance Measure</b>	<b>PY20 MWA Proposed Target</b>	<b>PY21 MWA Proposed Target</b>
<b>WIOA ADULT</b>		
Employment Rate 2nd Quarter After Exit	88.6	89.1
Employment Rate 4th Quarter After Exit	84.9	85.4
Median Earnings 2nd Quarter After Exit	\$6,856	\$6,856
Credential Rate 4th Quarter After Exit	83.4	83.4
Measurable Skill Gains	41.4	41.4
<b>WIOA DISLOCATED WORKER</b>		
Employment Rate 2nd Quarter After Exit	85.8	85.8
Employment Rate 4th Quarter After Exit	82.7	82.7
Median Earnings 2nd Quarter After Exit	\$8,839	\$8,839
Credential Rate 4th Quarter After Exit	80.6	80.6
Measurable Skill Gains	33.6	33.6
<b>WIOA YOUTH</b>		
Employment Rate 2nd Quarter After Exit	78.6	78.6
Employment Rate 4th Quarter After Exit	79.0	79.0
Median Earnings 2nd Quarter After Exit	\$3,354	\$3,354
Credential Rate 4th Quarter After Exit	59.7	59.7
Measurable Skill Gains	32.5	32.5
<b>WAGNER-PEYSER</b>		
Employment Rate 2nd Quarter After Exit	73.6	74.6
Employment Rate 4th Quarter After Exit	71.8	71.8
Median Earnings 2nd Quarter After Exit	\$6,445	\$6,545

## 2. A description of the workforce development system in the local area including:

- The programs that are included in that system.

West Michigan Works! is part of the statewide Michigan Works! system and is the official workforce development agency in West Michigan, serving the employers and job seekers of Allegan, Barry, Ionia, Kent, Montcalm, Muskegon and Ottawa counties. The agency brings federal and state workforce programs to the region, leveraging and aligning resources for maximum impact, with the ultimate goal of preparing a skilled workforce that meets the needs of local businesses. The full picture of workforce development in West Michigan is much bigger than one agency. It operates as a system, incorporating a broad set of partners and stakeholders, including community-based organizations, education and training partners, and employer associations.



Within this system, job seekers and employers can connect to valued work force programs from an American Job Center that include:

- WIOA Title I Youth, Adult and Dislocated Worker programs
- Wagner-Peyser Act
- Trade Adjustment Assistance (TAA)
- Migrant and Seasonal Worker Program
- Fidelity Bonding
- Adult Education and Literacy activities
- Vocational Rehabilitation
- Older Worker services
- Veterans services
- Employment and training activities including programs authorized under the Carl D. Perkins Career and Technical Education Act
- Unemployment Insurance Agency – registering for work
- Partnership, Accountability, Training and Hope (PATH), including Refugee programming
- Food Assistance Employment and Training Program (FAE&T)
- Prisoner Re-entry
- Job Corp
- Youth Build

- Telamon
- Industry Sector partners
- Business Services, including Rapids Response

West Michigan Works! delivers services for WIOA Title I, except for youth services in Kent County. Those services are provided through contracts by experienced community partners who hold expertise in working with young adults. Services that cannot be provided directly are offered through various partner agencies in the West Michigan Works! service area.

Services can be accessed by contacting or visiting one of the 12 locations (10 full One-Stop Service Centers and 2 affiliate sites) throughout the seven-county region. Contact information, service center locations, and hours of operation can be found [here](#).

- A description of the local board's strategy to work with entities carrying out core programs and other workforce development programs to provide service alignment (including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006).

The delivery of core programs and the alignment with one-stop partners is bridged by the One Stop Service Operator (OSO). The OSO is charged with assisting WMW in the coordination of services from multiple partners to ensure both quality and efficiency are achieved. In areas where expansion of services is identified, the OSO will facilitate the connections among programs and partners so that services are integrated as much as possible and the customer experience is streamlined.

This coordination includes working closely with the Intermediate School Districts (ISDs) to strengthen the relationship with Career Technical Education programs authorized under the Carl D. Perkins Career and Technical Education Act. In addition to local partnerships, the Career and Educational and Advisory Council (CEAC) reviews and provides input on the ISD's Career and Technical Education (CTE) plans.

As noted in the regional plan, organizations such as [Talent 2025](#), Adult Learning Partners of West Michigan (ALPWM), Michigan Department of Corrections (MDOC) [Offenders Success Program](#) and [The West Michigan Veteran Coalition](#) (WMVC) are also critical to ensuring that core services align with the broader needs of region 4.

Additionally, we have identified *Convening and Connecting* as a strategic core competency. Staff members across the organization have built partnerships and established relationships with partners in the workforce development ecosystem. WMW will continue to build on this competency using the following tactics:

- Act as a hub for connecting organizations across regional networks
- Continuously identify gaps and target resources accordingly
- Continue convening Industry Councils focused on the talent needs of employers
- Work with Community Colleges and other training organizations to create programs and pathways that meets employers' needs for their current and future workforce



### 3. A description of how the local board, working with the entities carrying out core programs will:

- Expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment.

West Michigan is also focused on identifying and expanding access to employment, training, education, and support services to eligible individuals, including those with disabilities.

These initiatives include addressing the infrastructure improvements needed to lessen the barriers brought by housing, transportation, and internet access, as well as increasing the training and employment opportunities that are available to this population. Based on the data shared earlier in this plan, race is a clear indicator of employment and earning opportunities and outcomes in West Michigan. Therefore, West Michigan is committed to ensuring access to services and opportunities for all people groups in the region. Efforts include structured training for West Michigan Works! staff around race, culture, and equity practices, partnerships with community-based organizations who work with targeted populations, training opportunities for West Michigan employers in equitable hiring practices, and continuous evaluation of our own service delivery practices.

Onsite Certified Nursing Assistant (CNA) classes that target this population are in Kent, Muskegon, and Ottawa Counties. These classes offer a longer learning time and include instruction from local training partners and work-ready instruction from a WMW Talent Development Instructor (TDI).

Michigan Rehabilitation Services (MRS) is a core partner and co-located inside of many of the local Service Centers. In addition, WMW has established relationships with Michigan Bureau for Blind Services, Disabilities Advocates, Disability Connections, and agencies offering services for older workers.

Adult Education and Literacy programs are also accessible. Some of the Service Centers throughout the Region 4b area provide instruction and testing onsite in partnership with Adult Education providers. In areas that have expanded resources, community conversations and informational tours are taking place to increase awareness of workforce development services.

In some communities, Michigan Works! staff conduct workshops and initiate career coaching at the Adult Education Provider location. Adult education services are currently provided in four of WMW's eight Service Centers. Short term occupational skills training, career technical training and higher education opportunities are also available throughout the region and are funded with local WIOA Adult, Dislocated Worker and Youth allocations for those who qualify.

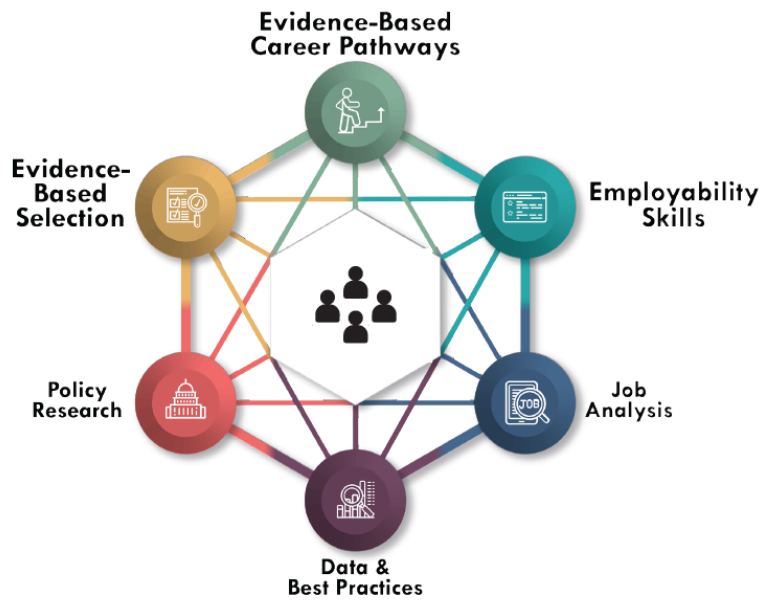
WMW works closely with training providers to ensure that the supported programs lead to an industry-recognized credential and that the credential aligns with employer demand. Recent initiatives have also proved that training providers, including community colleges, are responsive to the development and delivery of a curriculum that directly addresses the skill gaps.

- Facilitate the development of career pathways and co-enrollment, as appropriate, in core programs.
- Improve access to activities leading to a recognized post-secondary credential (including a credential that is an industry-recognized certificate or certification, portable, and stackable).



WMW actively engages with local employers and training providers through the various committees and councils to develop career pathway options that promote career laddering opportunities in high demand industry sectors.

WMW is a key partner of the Talent Innovation Network of West Michigan (TaINet), emerging in 2019 and known as a vehicle for taking the workforce development work of West Michigan and advancing it from good to great, incorporates evidence-based career pathways into the six-prong approach. With dedicated stakeholders of employers, educators, public workforce agencies, economic development groups and human-service agencies covering the 13-county region, collectively we are working towards the vision for success.



### **Evidence-Based Career Pathways**

Advance the use of the seven-step career pathways model by educational institutions, workforce agencies and employers to improve career coaching, career profiles and career navigation skills.

### **Vision for Success**

Our vision is to create a regional talent system where:

- Employers identify the competencies that are measurably related to job performance and align their internal systems to source, select, and develop talent based on these competencies.
- Employers communicate their competency requirements to job seekers, talent suppliers, employees, parents, and students.
- Educational institutions and workforce agencies align their offerings to deliver the needed competencies.

- Students and job seekers have the skills and resources needed to make smart decisions about career choices and effectively represent their skills to targeted employers
- Policy and funding are aligned to support the above.

WMW continues to understand the needs of area employers, evaluate the variety, locations, and effectiveness of the trainings currently offered and with the support of all stakeholders, work together to improve the access to activities and training opportunities leading to a recognized post-secondary credentials.

WMW is dedicated to creating access to creative and innovative solutions to training and credentials, including work-based learning opportunities that are also tied to credentials and programs such as Integrated Education and Training, allowing individuals to work on both a high school equivalency certificate and an industry-recognized credential. Strategies such as these meet individuals where they are and assist in solving real-life problems of needing to earn money immediately while continuing to further the training of the individual.

With the recent economic shift caused by Covid-19, many of the available trainings have either temporarily halted or have moved to a hybrid of in-person and online platforms. This brings more challenges regarding the availability and access of needed training in our area. As this shift continues to evolve, WMW is committed to seeking innovate ways to assist job seekers with access by means of maximizing support services through dual enrollment into programs when appropriate and expanding allowable supports to include technology packages and internet access.

#### 4. A description of the strategies and services that will be used in the local area to:

- Facilitate engagement of employers, including small employers and employers in in-demand industry sectors and occupations, in workforce development programs.
- Support a local workforce development system that meets the needs of businesses in the local area.

As previously mentioned, West Michigan Works! facilitates the engagement of employers through the various Industry Councils. Through the leadership of a West Michigan Works! Industry Council Lead (ICL), we strive to meet the workforce development needs of area employers.

The ICL is part of a more robust [West Michigan Works! Business Solutions team](#) and serves as the primary liaison between the agency and employers offering a wide variety of services and resources available through the Michigan Works! system and pulling in workforce development, economic development, education, and other regional partners, as needed.

The WMW Business Solutions team also consists of Regional Managers, Business Solution Representatives (BSR), an Apprenticeship Success Coordinator and Project Manager offering services to assist employers recruit, train, and retain talent through job fairs, employer of the day events, networking job clubs, work based trainings and a rapid response system.

The Retention Solutions Network at West Michigan Works! offers customized, timely, in-person support and training to member employers to keep employees on the job and businesses thriving. This network

offers a deeper level of service to help employers minimized work disruptions, decrease absenteeism, increased employee retention and engagement, provide insightful data on impact, train front line workers, supervisors, and managers, and share best practices among employer members.

WMW also supports local businesses by leveraging federal and state funding, as well as other grant opportunities to braid resources used to support training needs aimed at upskilling the current workforce.

Small businesses are represented by the Industry Councils and also supported on a one-on-one basis, ensuring that they can take advantage of the services that many larger businesses in the area are already participating in. West Michigan Works! relies on established Industry Talent Councils to engage employers and help provide the capacity needs of the workforce system. Industry talent councils are employer led, and each council has representation from local small business owners, area employers, and established higher education providers. This diverse group of stakeholders allow the councils to identify the current employer demand and the skills needed to align those efforts.

Establishing Industry Talent Councils in each of the high demand industries in the region has proven to be a great strength for West Michigan Works! Stakeholders involved in the council provide real time feedback and strategy to move each industry forward.

Key roles of each of the Industry Talent Councils include:

- Information conduit; sharing trends and best practices affecting talent.
- Talent Initiatives; leading, supporting and promoting talent initiatives throughout West Michigan.
- Training Needs; sharing current training needs with educational partners to develop curriculum, create career pathways and nurture a supply chain of talent.
- Networking; promoting networking among employers, educators, workforce development and economic development professionals for the purpose of developing a skilled workforce.

West Michigan Works! focuses on the following four Industry Sectors: Agribusiness, Construction & Energy, Manufacturing, HealthCare, and Information Technology. Each of the Industry Sectors has formed an Industry Council to identify the needs of employers within the sector and meet those needs through creative and collaborative solutions.

### *Construction*

The [Construction Workforce Development Alliance of West Michigan](#) (CWDA) was created by the Associated Builders and Contractors Western Michigan Chapter (ABCWM), American Subcontractors Association of Michigan (ASAM), and Home Builders Association of Greater Grand Rapids (HBAGGR). It includes a collaborative of partners including workforce development, educators, and construction employers.

Projects within CWDA include:

- [Core Construction Jump Start Program](#)
- [MiCareerQuest](#)
- [Careers in Construction Month](#)

### *Manufacturing*

Region 4b is a key stakeholder in facilitating and maintaining the council that includes employers, community partners, and training providers who all share the mission on expanding talent throughout West Michigan.

Recent projects of this council include:

- The expansion of West Michigan Manufacturing Week activities
- MiCareerQuest
- Adopt a School Program
- Best Practices Seminars
- Development of an updated Discover Manufacturing website that invites students, parents, educators, and employers to stay connected and engaged in manufacturing.

### *Healthcare*

The West Michigan Health Careers Council is a collaborative of healthcare employers, educators, workforce development, and economic development organizations working together to meet West Michigan's healthcare talent needs. The Council offers employers opportunities to help solve healthcare talent needs, whether that be developing pools of qualified candidates, utilizing proven assessment tools, engaging in training programs, or opening access to training funding streams, among others. The work of the West Michigan Health Careers Council includes a focus around continued growth of occupation awareness and career pathways.

### *Information Technology*

West Michigan Tech Talent (WMTT) is a collaborative of technology employers, educators, workforce development and economic development organizations working together to meet West Michigan's current and future technology talent needs. WMTT achieves its goals through the work of three workgroups. WMTT also supports its network by helping coordinate and promote a variety of events, workshops, and community organizations through its website and by financially supporting a sponsorship program.

Some of the initiatives in these workgroups include:

- **GROW:** efforts towards K-12 students with an aim to support projects which create awareness and interest in the IT field and encourage students to prepare for careers in IT. Projects include MiCareer Quest, Events for Teachers to incorporate computer science in the classroom, and the West Michigan Hour of Code Initiative. In 2019, the West Michigan Hour of Code initiative had over 80 volunteers from nearly 30 local IT employers, reaching nearly 3,000 3<sup>rd</sup>-5<sup>th</sup> grade students across our seven-county region.
- **DEVELOP:** efforts towards adult learners and career changers. It aims to align local training and development opportunities with identified skill gaps from employers. West Michigan Tech Talent employer members created a video campaign called *Jump In: Women in Tech* encouraging females to consider tech careers. The campaign provided local resources available to pursue a career in technology.

- **RECRUIT/RETAIN:** efforts towards attracting IT talent from outside the region and retain current talent within our region, utilizing best practices and partnering with organizations that currently pursue these efforts. Projects include organizing a campaign around collective data about IT positions and job openings, and support/sponsorship of local tech conferences.

### *Agribusiness*

Recent collaboration of West Michigan food processing and traditional agricultural companies has led to the development of the [Agribusiness Talent Council](#). The council is dedicated to attracting talent, promoting the industry, and providing training and resources to employers.

- Improve coordination between workforce development programs and economic development.

West Michigan Works! convenes an aligned network of partners, cultivates a skilled workforce, and meets the needs of employers. With the mission to lead workforce development strategy and resource alignment in West Michigan by understanding the talent needs of employers and employment needs of jobseekers and connecting them to solutions, the coordination between workforce programs and economic needs is imperative.

WMW has a strong partnership with all local economic development organizations. Representation from the Right Place, Muskegon Area First, Lakeshore Advantage, and the Barry County Economic Development Alliance serve on the WMW WDB, and WMW representatives serve on many of the economic development boards and committees. Additionally, our local economic development agencies and business solutions representatives actively work together to create solutions for area businesses.

- Strengthen linkages between the One-Stop delivery system and Unemployment Insurance programs.

Michigan's Unemployment Insurance Agency (UIA) manages the unemployment insurance program which provides temporary income to workers who have lost their job through no fault of their own. The program is funded through unemployment taxes paid by employers.

Under normal circumstances, Michigan residents who apply for Unemployment Insurance (UI) benefits will also visit a local service center to create a profile on the Pure Michigan Talent Connect (PMTTC), which serves as the state's labor exchange system by connecting Michigan's job seekers and employers. WMW frontline staff will view the claimant's online profile and then electronically transmit the claimant's validated registration using a shared electronic system. This data is then downloaded into the UI mainframe, where the registration date is posted to the claimant's UI record.

It is the entry of registration data that allows benefit payments. If a claimant enters his or her profile into the PMTC but fails to report in-person to a One-Stop Service Center, the UI system will not allow benefit payment, even though the claimant is registered for work.

West Michigan Works! and the UIA work closely together with a goal to assist individuals with employment reengagement. This collaboration includes ensuring that employment services are available to claimants including assistance with:

- Access to computers to file a claim, review information about their claim, see job opportunities in their area and check their UI "to do" list so they do not miss important deadlines.

- How to best use the PMTC to navigate through and provide valuable information on this site for job seekers and employers to assist in the many facets of career development and placement.
- Meet the work test requirements of the state unemployment compensation system by finding and applying for jobs.
- Processing waivers of work search for claimants who are enrolled in approved training or school.

To streamline the programmatic registration process, increase documentation accuracy and gain insight on the quality of education and training programs, the state has established a Confidential Agreement for Information with the UIA to allow the Michigan Works Agencies (MWA) access to wage record data and customer email addresses.

Additionally, all West Michigan Works! full-service centers had a designated phone that gives claimants in the One-Stop Service Center priority when seeking assistance from a UI agent.

To promote a wholistic understanding of the UI system, West Michigan Works! staff have been encouraged to job shadow agents and the UIA offices and UI agents have been encouraged to job shadow WMW frontline staff while assisting claimants in the Service Centers.

The region also has an established relationship with the state's Reemployment Analyst, allowing for more frequent information sharing and quick resolution for claimants who may be experiencing unique issues.

More recently, due to the health risk of Covid-19 and the rising number of people in need of UI benefits, the UIA has temporarily waived in-person registration and work search requirements for Michigan residents. Although this has temporarily changed some of the service delivery strategies outlined in this plan, West Michigan Works staff have shifted to assisting claimants in a different way, strengthening the linkage between the two agencies even more.

## 5. A description of how the local board will coordinate local workforce investment activities with regional economic development activities that are carried out in the local area and how the local board will promote entrepreneurial skills training and microenterprise services.

WMW partners with regional and local economic developers to provide the best possible service to new and expanding companies and better understand the forecasted skills needed to fill job vacancies. When appropriate, the WMW Business Solutions Representative (BSR) and economic developers make joint calls to businesses to fact find employer needs and possible solutions. On a regional level, WMW also works closely works with Talent 2025 to address the growing needs of the region.

In the space of workforce activities and regional economic development, it is recognized that there are some individuals who may be particularly well suited for entrepreneurial enterprises. Within the local One-Stop Service Center, efforts are made to ensure individuals are exposed to the appropriate resources. This is achieved by offering job seekers resources, career coaching, career pathway planning

and working with community partners, such as Grand Valley State University's Small Business Development Center.

## 6. A description of the One-Stop delivery system in the local area, including:

- How the local board will ensure the continuous improvement of eligible providers of services through the system and that such providers will meet the employment needs of local employers, workers, and job seekers.

West Michigan Works! delivers core workforce services directly, except for youth services in Kent county. This allows us to continuously evaluate, analyze, and improve effectiveness to ensure we are meeting the needs of the employers, workers, and job seekers.

In addition to professional staff development that includes opportunities for personal and professional growth, diversity awareness, career coaching techniques, Business Solutions Professional (BSP) certificate, and leadership workshops, WMW is also committed to continuous improvement in developing community partnerships, understanding the needs of area employers, and providing better access to career and training services for job seekers.

Evaluation of effectiveness is accomplished through negotiated performance goals, programmatic monitoring, and internal quality and compliance reviews. Internal reviews take a holistic approach to identify possible areas of weakness in service delivery, staff training deficiencies, and best practices that can be shared across our region. When possible, demographics, educational attainment, and poverty levels are also studied.

Results and progress towards our strategic goals are provided to and reviewed by the Workforce Development Board (WDB) and the governing Board.

- How the local board will facilitate access to services provided through the One-Stop delivery system, including in remote areas, through the use of technology and other means.

WMW has eight full One-Stop Service Centers and two affiliate sites within the seven-county region. Access to services is provided through the Center either at the center or off site depending on the needs of the job seeker and or employer. Appointments may be made outside of regular business hours as deemed necessary. During the recent COVID-19 crisis, WMW has been creative in providing new ways of accessing services, including through video conferencing, prerecorded videos outlining information and workshops, telephone intakes, electronic documentation processes, and the provision of activities through a learning management system. Though forced into some of these activities out of necessity, we believe that many of these practices will continue permanently as we move forward. WMW has updated supportive service policies to include the provision of technology to access services where necessary, and we have partnered with creative ways with existing structures that provide internet access to those who may live in outlying areas.

Additionally, WMW uses its network of partners to meet individuals where they are, both literally and figuratively by identifying creative solutions to access. Information on how to access services and service locations can be found on our [website](#).

- How entities within the One-Stop delivery system, including One-Stop operators and the One-Stop partners, will comply with the nondiscrimination provisions of the WIOA (Section 188), if



applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 United States Code [U.S.C.] 12101, et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities.

West Michigan Works! supports universal access to diverse customer needs that exist within the local delivery area, which includes the needs of individuals with disabilities, people of different cultures, and persons with barriers to employment. Where inclusion abounds, centers are welcoming, inviting, accommodating, and accessible to everyone. Reasonable accommodations are made including access to facilities, services, technology, and materials.

The WMW agency and the OSO comply with all regulations relating to non-discrimination, equal opportunity, and inclusion.

- A description of the roles and resource contributions of the One-Stop partners.

The roles and resource contribution of the One-Stop partners are outlined in Memorandum of Understandings (MOUs) that ensure coordination and delivery of services and establish joint procedures to enable all parties to be more fully integrated into the current service delivery system. These service provisions vary county by county; therefore, the county-specific MOUs are attached to this document.

## 7. A description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area.

Training services are provided to equip individuals to enter the workforce and retain employment. Under the Workforce Innovation and Opportunity Act (WIOA), a program of training services includes a structured regimen that leads to specific outcomes. A program of training services is one or more courses or classes, or a structured regimen that leads to:

- a) An industry-recognized certificate; a certificate of completion of a registered apprenticeship, a license recognized by the state involved or the federal government
- b) A post-secondary credential (an associate or baccalaureate degree)
- c) Consistent with 20 Code of Federal Regulation (CFR) 680.350, a secondary school diploma, or its equivalent
- d) Employment, or
- e) Measurable skill gains toward such a credential or employment as described in (a) or (b).

Training services are available to eligible, registered WIOA participants who, after an interview, evaluation or assessment and career planning, are determined to be unlikely or unable to obtain or retain employment that leads to self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone.

WMW relies on annual labor market information to identify in-demand occupations and the level of training needed for each one. This information is then vetted through the Industry Talent Councils to confirm the accuracy of the data for our local area. WMW makes this information available to the public, including training partners, to help identify the need for new trainings and methods of delivery.

Types of training offered for eligible Adult, Dislocated Workers and Youth include:

- On-the-Job Training



- Skill Upgrading
- Entrepreneurial Training
- ABE or ESL (contextualized or other) in Conjunction with Training
- Customized Training
- Other Occupational Skills Training
- Registered Apprenticeships
- Other Non-Occupational Skills Training

## 8. A description of the design framework for youth programs in the local area, and how the 14 program elements required in 20 CFR Section 681.460 are to be made available within that framework.

West Michigan Works! provides youth services across the seven-county region through a blend of direct and contracted programs. Direct, out-of-school youth (OSY) services are delivered by WMW staff in Allegan, Barry, Ionia, Montcalm, Muskegon, and Ottawa. Subcontractors deliver youth services in Kent County and include both in-school youth (ISY) and out-of-school youth (OSY) services. Youth are immediately informed of the various program elements available within WIOA through the use of flyers and discussion with interested youth and partner agencies. Program elements accessed by the youth are determined based on the Individual Service Strategy (ISS) development with the youth. The fourteen elements are available, either provided directly by WMW or contracted Youth Career Coaches or through referral to a partner organization. Memorandums of Understanding (MOUs) or contracts are developed for elements that cannot be provided directly by WIOA staff.

Jobs for America's Graduates (JAG)/Jobs for Michigan's Graduates (JMG) is the delivery curriculum and framework implemented for the direct service youth locations and is available at one of the Kent County contractors. JMG competencies and events align well with the WIOA program elements and provides assessment of progress made with the youth towards career readiness. JAG/JMG was chosen as the WMW youth model for service delivery due to its success as a school-to-college/career program for at-risk, disadvantaged youth.

## 9. A local definition of Part B of Basic Skills Deficiency, which reads "a youth who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society."

The local definition of Part B of Basic Skills Deficiency can be found in the WMW *WIOA In- and Out-of-School Youth Eligibility Policy 15-03c2*, which states is a youth "Who is unable to compute or solve problems, or read, write, or speak English at the level necessary to function on the job, in the individual's family, or in society, as locally defined with one or more of the following criteria:

- English is the individual's second language; or
- Has a social, mental, or physical impairment as documented by a physician or other qualified service provider; or
- Enrolled in remedial courses in post-secondary education; or

- Lacks the short-term pre-vocational skills (i.e. learning, communication or computer literacy skills) an individual needs to prepare for unsubsidized employment or training, as documented by and in his/her comprehensive assessment; or
- On-the-Job Training ONLY: if an individual possesses 50% or less of the skills required to do the job, as indicated by the training outline.

**10. A description and assessment of the type and availability of youth workforce investment activities in the local area, including activities for youth who are individuals with disabilities, which shall include an identification of successful models of such activities.** Further, local areas are to define “requires additional assistance” for In-School and Out-of-School Youth eligibility criterion in their Local Plan.

Youth activities include both individualized and group offerings, as appropriate. The fourteen program elements are available and accessible through the youth service provider or through an identified community resource that offers the necessary service. Beyond the fourteen program elements, services also include eligibility and suitability determination, academic and occupational assessments, individual service strategy development with the youth, support services, incentives, and career coaching.

A variety of activities are available to help youth become employment ready. These include, but are not limited to, resume building, interview skills, workplace etiquette, job search assistance, job placement, paid and unpaid work experience (summer and year-round) and access to funding for industry recognized training and certification. Career guidance and education is provided through online and in person career exploration and assessments, labor market information, college and talent tours, assistance with FAFSA application and identifying other financial aid information and options.

WMW and partnering organizations host MiCareer Quest, a regional career exploration program serving over 9,000 students each year. MiCareer Quest provides employer-led, hands-on experiences for youth in various in-demand industries including healthcare, manufacturing, IT, construction, and agribusiness. Educational institutions help link the career and education elements. This event primarily targets in-school youth; however, WIOA-enrolled out-of-school youth from the region are also invited and participate in the event.

Academic services are provided through tutoring, time management, monitoring of academic progress and attendance, goal setting/career planning, decision-making, mentoring, financial literacy, high school completion or GED preparation and testing. Jobs for Michigan’s Graduates (JMG) is the curriculum and foundation of the direct, out-of-school youth program and services.

Reasonable and necessary accommodations are provided to youth with disabilities to ensure WIOA services and activities are available. Collaborative relationships exist in the region with Michigan Rehabilitation Services (MRS) to assist in coordinating programs, funding, and opportunities for disabled youth, when identified as a need. Attendance at the Michigan Career Technical Institute (MCTI) is also available to assist with credentialing, for those eligible.

WMW *WIOA In- and Out-of-School Youth Eligibility Policy 15-03c2* includes the approved criteria for determining youth who requires additional assistance. This policy is attached for reference of the fifteen “requires additional assistance” barriers and basic skills deficiency definition.

11. Information regarding any waivers being utilized by the local area, in accordance with any Michigan Department of Labor and Economic Opportunity-Workforce Development (LEO-WD) communicated guidelines or requirements regarding the use of the waiver(s).

West Michigan Works! has not requested any waivers.

12. A description of how the local board will coordinate relevant secondary and post-secondary education programs and activities with education and workforce investment activities to coordinate strategies, enhance services, and avoid duplication of services.

With the support of the Career Education Advisory Council (CEAC), the Talent Innovation Network of West Michigan (TalNet) and the members of the ALPWM, West Michigan Works! continues to identify and implement opportunities to coordinate and enhance secondary and post-secondary education activities with workforce activities.

With adult education providers and WMW aligning the use of the Comprehensive Adult Student Assessment System (CASAS), the area can avoid duplication of eligibility and suitability requirements often imposed on the job seeker. The recognition of an evidence-based career coaching model and agreement on what it takes to prepare a skilled workforce is also instrumental in avoiding duplication of services and moving job seekers towards their career goals. Through TalNet, community colleges, WMW, and several K-12 districts have agreed on an employability skills framework that will be taught throughout K-12, postsecondary, and the public workforce system. Additionally, WMW has close partnerships with the local ISDs and frequently coordinate on workforce activities, including the offering of employability skills and job search workshops.

In areas where it is not feasible for secondary education providers to offer instruction in a One-Stop Service Center, WMW Career Coaches work alongside the provider to support the job seeker and remain focused on the goals identified as part of a developed Individual Employment Plan. This helps bridge the transition from secondary education to post-secondary education and increases credential attainment.

Integrated Education and Training (IET) opportunities are also emerging in West Michigan. This approach provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation for the purpose of educational and career advancement. Although this level of collaboration can be more challenging, the area has successfully completed cohorts for Truck Driving (CDL A), Certified Nursing Assistant (CNA) and Corrections Officer, and through Special 107 grants, welding, machining, and electronics training.

13. A determination of whether the Michigan Works! Agency (MWA) has elected to provide supportive services and needs related payments. The MWAs that elect to provide supportive services to participants during program enrollment must describe the procedure to provide supportive services. The procedure will include the conditions, amounts, duration, and documentation requirements for the provision of supportive services.

Support services will be made available to enrolled individuals who demonstrate a need that directly correlates with participation, employment and training. This need will be assessed by a Career Coach and documented on the participant's Individual Service Strategy (ISS) or Individual Employment Plan

(IEP). Needs Related Payments (NRP) may be available to those participating in an approved training activity, as allowed by the utilized funding stream. The parameters for eligibility, service conditions, amounts, duration and required documents are outlined in the *Support Services Policy 15-06c4* and subsequent changes.

#### 14. A description of how the local board will coordinate the WIOA Title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area.

When possible, activities will be scheduled jointly with community partners or at the same location to minimize transportation barriers. Virtual offerings for enrollment, assessments and other service provision are currently being expanded to help reduce transportation and public space barriers in response to the Covid-19 pandemic.

As part of the assessment process, a WMW Career Coach works with the individual to complete an Individual Service Strategy (ISS) or Individual Employment Plan (IEP). This employment plan identifies employment and training goals as well as barriers that might impact successfully achieving these goals.

Whenever possible, the WMW Career Coach will work directly with the individual to seek community resources deemed to aid in removing the barriers. If no other resources are available, and the support needs fall within the provisions of the local support service policy, such supports may be approved through WIOA.

#### 15. A description of the local per participant funding cap, if applicable.

WMW has not established a per participant funding cap outside of the support service and Individual Training Account (ITA) service provisions. Support services are capped at \$1,000/rolling 12-month period and ITA's are capped at \$5,000/year and \$10,000/24 months with no lifetime limit.

#### 16. A description of plans, assurances, and strategies for maximizing coordination, improving service delivery, and avoiding duplication of Wagner-Peyser Act services and other services provided through the One-Stop delivery system.

West Michigan Works! feels that duplication of services does not align with a human centered approach and takes intentional measures to avoid duplication whenever possible. This includes duplication of referral, duplication of forms, and duplication of services provided.

Since WMW provides all Wagner-Peyser and WIOA Adult and Dislocated Worker services directly, a natural coordination of referrals into other WIOA and partner services occur. Career Coaches and Career Navigators are cross-trained within the core programs and utilize the state One Stop Management Information System (OMSIS) to case note progress and access information or services previously provided to the job seeker. This also allows for dual enrollment into multiple programs when needed. Where possible, WMW staff is organized by function, rather than by program.

In cases where individuals are referred through a partner agency or are referred to a partner agency, the two agencies will convene to determine a strategy in the best interest of the jobseeker. In many cases,

it's feasible to implement a direct referral process that allows us to share information using signed releases.

For individuals being referred to or from partner education providers that also offer career coaching, the progress made by the individual is recognized and the coaches can resume service delivery where the previous coach left off, thus meeting the job seeker where they are.

**17. A description of how the local area is planning to deliver employment services in accordance with the Wagner-Peyser Act of 1933, as amended by Title III of the WIOA. This description shall include:**

- The identification of a point of contact (name, address, phone number, email).

*Contact information:*

Tasha Evans, Policy Manager  
West Michigan Works!  
215 Straight Ave. Grand Rapids, MI 49504  
Telephone: (616) 336-2070  
Email: [tevens@westmiworks.org](mailto:tevens@westmiworks.org)

- Information regarding whether the MWA is providing employment services directly in the local area or if service providers are being used. If service providers are being used, please include the name of the provider, the type of entity, and whether or not the provider is a merit-based organization. For type of entity, please choose from the following: state governmental agency, local unit of government, special purpose unit of government, school district, intermediate school district, public community college, public university, or other.

West Michigan works! provides employment services directly as a special purpose unit of government.

- A description of how Wagner-Peyser funded services will be provided at no cost to employers and job seekers.

Access to services is provided at no cost to employers and job seekers by visiting a West Michigan Works! One-Stop Service Center or filiate sites or by accessing available services online. One-Stop Service Centers are equipped with ample computers, workstations, office space, webcams for virtual job fairs and hiring events, a resource kiosk, and other equipment commonly utilized for job search activities such as printers and fax machines. All One-Stop Service Centers also provide reasonable accommodations for individuals with disabilities and priority of service for veterans and eligible spouses.

Additionally, services are often delivered onsite or remotely for Rapid Responses, Worker Benefit Orientations (WBO), On the job training (OJT) follow-ups, individuals who are incarcerated, Job Corp students, and cohort style enrollment and trainings.

Recently, WMW has also responded to the economic impact of Covid-19 by enhancing electronically accessible resources on our website, finding innovative ways to provide labor marker information (LMI), assessments, workshops, and other service options remotely.

- An explanation of how labor exchange services will be provided using the three tiers of services: self-services, facilitated services, and staff-assisted services.
- A description of the manner in which career services are being delivered.

Regardless of the service delivery method, WMW is committed to providing universal access to three levels of services for employers and job seekers:

#### *Self-Services:*

Any service that is provided to employers through an electronic resource or at a physical location in which there is little to no staff involvement; Any service that is provided to the job seeker through an electronic resource or at a physical location in which there is little to no staff involvement.

#### *Staff-Assisted Services:*

Assisting the employer in using any of the self-service tools, including:

- Assistance with navigating the Pure Michigan Talent Connect (PMTTC)
- Distributing and collecting job applications

Assisting the job seeker in using any of the self-service tools, including:

- Assistance with navigating the PMTC and internet sites
- Inputting information on the PMTC for job seekers
- Printing and making copies of resume
- Job search assistance

#### *Individualized Staff-Assisted Services:*

A service that requires a significant amount of staff-time, including:

- Inputting job orders on the PMTC for employers
- Completing a search of resumes that match the criteria of job orders for employers
- Contacting job seekers, on behalf of the employers, for initial screenings prior to interviewing with the employer
- Scheduling interviews for the employer
- General Services/Assistance
  - Assistance establishing eligibility for Financial Aid
  - Initial assessment of skill levels and supportive service needs
  - Provision of information and meaningful assistance filing for Unemployment Insurance (UI)
- Job/Training Preparation
  - Career Counseling/Guidance
  - Job search assistance
- Placement Assistance
  - Placement assistance/referred to employment

The level of career service needed will be determined jointly with a West Michigan Works! staff using fact finding techniques and probing questions. For job seekers, Career Navigators, Talent Development Specialists (TDS), and Talent Development instructors (TDI), are available to assist at all service center

locations. For employers, regional Business Solutions Representatives (BSR), Industry Council Leads (ICL), and an Apprenticeship Coordinator can assist on site or in any of the service center locations.

In some areas, partnerships with youth providers, local prisons, Job Corps, education providers using cohort style training, and disability advocates have also been established to provide all three levels of service to job seekers on site.

More recently in response to Covid-19, West Michigan works! has enhanced information about services and access to services through our website.

WMW follows the protocols set for serving veterans through the Jobs for Veterans State Grant (JVSG), priority of service, and serving people with disabilities.

- A listing of how many staff at each site will be available to provide services.

Staffing levels are based on the traffic patterns and unique needs of the local area. Although staff are typically assigned to one center, WMW also employs “floating” staff who are trained in delivering employment services (ES) and are equipped to provide seamless coverage for planned leave time and special events. The following listing includes the WMW Career Navigators, Talent Development Specialists (TDS), Talent Development Instructors (TDI) and the Manager responsible for overseeing ES services.

**Designated Michigan Works! Service Center Offices:**

One-Stop Service Center Location		Staff Available
<b>Allegan County</b>	Allegan Service Center 3255 122nd Ave. Suite 101 Allegan, MI 49010	6
	Fennville Service Center (Affiliate Site) 220 E. Main Fennville, MI 49408	
<b>Barry County</b>	Barry Service Center 130 E State St. Hastings, MI 49058	
<b>Kent County</b>	Westside Service Center 215 Straight NW Grand Rapids, MI 49504	8
	Franklin Service Center 121 Franklin S.E. Suite 120 Grand Rapids, MI 49505	11

<b><i>Kent county</i></b>	North Kent Service Center (Affiliate Site) 10075 Northland Dr NE Rockford, MI 49641	
<b><i>Ionia county</i></b>	Ionia Service Center 301 W. Main St. Ionia, MI 48846	6
<b><i>Montcalm County</i></b>	Montcalm Service Center 114 S Greenville W Dr. Greenville, MI 48838	
<b><i>Muskegon County</i></b>	Muskegon Service Center 316 Morris Ave Muskegon, MI 49440	9
<b><i>Ottawa County</i></b>	Ottawa Service Center 121 Clover St. Holland, MI 49423	6
<b><i>Regional Floating Career Navigators (Job seeker services)</i></b>		4
<b><i>Regional Business Solutions (Employer services)</i></b>		28

- A description of how the Unemployment Insurance (UI) Work Test will be administered. This description must include an explanation of how the registration of UI claimants will be conducted and how reporting claimant non-compliance with the “able, available, and seeking work” requirements will be managed.

Registration of Unemployment Insurance (IU) claimants occur after an individual applied for UI benefits. This process requires that the claimant visit a Michigan works! One-Stop Service Centers and create a job seeker account or registration on the Pure Michigan Talent Connect, an online tool connecting job seekers to employers.

During this process, WMW frontline staff will administer the UI Work Test to help assure that UI claimants receive exposure to job opportunities and demonstrate that claimants are meeting the basic requirements for receiving UI benefits: “If they are able, available, seeking employment, and did not refuse any suitable employment.”

Noncompliant issues or reasons associated with a violation to the Work Test include:

- Not being able to work
- Not being available to work
- Not seeking work
- Refusing offers of suitable work

If it comes to the attention of a WMW staff that a UI claimant is in violation of the work test requirements, it will be reported through the non-compliance to UI through the Michigan Integrated Data Automated System (MiDAS).



- A description of how the Reemployment Service Eligibility Assessment requirements will be administered.

Whenever possible, claimants who have been referred through RESEA and are within the local service area, will receive a personal invitation via US mail or email as an introduction to the One-Stop Service Center. Claimants also receive a time sensitive notice form UI requiring them to make an appointment with a one-stop service center within 21 days.

Appointments are scheduled at a minimum of two hours to ensure enough time to deliver all required components to the claimant. WMW will be flexible in scheduling when time permit and honor any request to reschedule within the policy guidelines.

West Michigan Works! will be responsible for providing the following components and reemployment activities:

#### *Orientation to West Michigan Works! services (First RESEA Only)*

The orientation will provide an overview of services available through the Michigan Works! Service Centers. In addition, each RESEA participant will be provided a packet of information related to job searching to take with them. This overview will include the following elements:

- What services/programs are offered through Michigan Works!
- Workshops, job fairs & other scheduled events
- Other partner services offered such as Adult Education, Veterans Services, and Michigan Rehabilitation Services (MRS)
- A description of and the benefits that the Pure Michigan Talent Connect (PMTTC) offers job seekers
- How to use the PMTC in your job search including how do you find employers and how employers find you
- Job search assistance including self-services, staff assisted services and individualized services
- Other job search methods and online web searches
- Opportunity to explore career pathways through Pathfinder and other career pathway exploration methods
- Information on classroom training, portable credentials, and work based training such as on-the-job training (OJT) opportunities and apprenticeships

#### *Confirmation of active Profile on Pure Michigan Talent Connect (PMTTC)*

For each RESEA participant, staff will verify their active profile status on PMTC. In addition, participants will be encouraged to complete the following resume sections:

- *Career status* is marked as “*actively searching*” and information entered is “*viewable to employers*”
- All basic required resume component are completed
- The *education* and *certificates* sections are completed
- *Work Experience* information is entered for the most recent employer, preferably 10 years of employment history will be entered

### *UIA Eligibility Assessment using the UI Eligibility Review Guide*

West Michigan Works! staff will meet with claimants in a confidential location to complete the Eligibility Assessment. Failure to seek or accept work will be reported as noted above.

### *Verification of Monthly Record of Work Search (Form #1583)*

Michigan Works! is expected to review the claimants' job search activities. UIA provides claimants with the "Bi-Weekly Emergency Unemployment Compensation Record of Work Search (UIA-1583)". The claimant completes the form prior to meeting with an ES staff. Review of the job search activities and offering of suggestions for improving searching strategies will be provided at this time.

### *Develop an Individual Service Strategy (ISS)*

The ISS prepared will list those services identified as needed, appropriate, and agreed to by the claimant, including job search, self-services, and training activities. Services offered to the claimant may be any of any combination and will be customized to the specific needs of the individual. The ISS will be used to assist in determining if a second appointment would be beneficial the claimant and will be documented electronically in the OSMIS.

### *Discuss specific Labor Market Information (LMI) with the claimant:*

Labor market and career information will be provided in a variety of ways. Assistance accessing or interpreting this information will be made available by skilled WMW staff. At a minimum, each participant will be provided current information from local Hot Jobs lists and encouraged to utilize the following websites:

- [www.milmi.org](http://www.milmi.org)
- [www.careeronestop.org/lmihome.asp](http://www.careeronestop.org/lmihome.asp)
- [www.mitalent.org](http://www.mitalent.org)

### *Provision of at least 2 hours of Reemployment Services:*

In addition to the elements described above, services including the direct referral to participate in a variety of employment readiness workshops and continued employment follow-up will take place. These services will be monitored to ensure they are meeting the minimum required time provisions.

For some RESEA participants the ISS will indicate that more individualized career coaching, barrier removal, occupational training or on-the-job training is necessary. In these instances, the Employment Specialist (ES) staff will take the appropriate steps to refer the participant to the needed service and will follow-up to determine if the RESEA participant has completed the entry process properly. In most cases this will mean a referral to the Workforce Innovation and Opportunity Act (WIOA) or the Trade Adjustment Act (TAA) programs also operated by West Michigan Works!

In other instances, re-employment will be the proper 'next step'. The Employment Specialist staff will work with West Michigan Works! Business Solutions Unit (BSU) to identify suitable employment opportunities. The participant will be referred to those job openings and whenever possible, follow-up will be done to determine if the participant is hired.

Success stories will be captured as often as possible and at a minimum, at least one success story will be submitted per quarter for reporting purposes.

- An explanation of how the MWA will participate in a system for clearing labor between the states by accepting and processing interstate and intrastate job orders as a component of the National Labor Exchange System.

West Michigan Works! participates in the system for clearing labor between the states by accepting and processing interstate and intrastate job orders by providing access to the Pure Michigan Talent connect and receiving and routing certain job orders to designated Employment Services staff for proper processing.

- An explanation of how the MWA will ensure veterans will be provided access to the same employment services received by the general population. This explanation must include a description of the screening process the MWA uses to refer eligible veterans to Veteran Career Advisors for case management services and how priority of service for veterans and eligible spouses will be applied in the delivery of Wagner-Peyser funded services.

All job seekers accessing the one-stop service center for the first time “register” with West Michigan Works!. This process captures basic information and demographics to create an account that will allow them to visit the center by means of a self-check in system for future visits.

As part of the registration process, veteran status is determined. If the job seeker has identified as a veteran or eligible spouse, it is requested they complete a Veterans Career Advisor (VCA) questionnaire. This questionnaire helps determine referral eligibility for VCA services. If the veteran is eligible, the questionnaire is given to the VCA either in person or by means of email depending on the location of the veteran and the availability of the VCA.

Regardless of eligibility or participation with VCA, these individuals will receive priority of service to employment services offered through the one-stop.

Priorities include but are not limited to access to job postings on the PMTC one day prior to the public and next available access to job search tools such as computers and printer.

- An assurance that Migrant and Seasonal Workers (MSWs) will have equitable access to and receive the full range of employment services that are provided to non-MSW customers.

Staff development opportunities, a West Michigan Works! designated point of contact, and internal monitoring ensures equitable access to services for MSW’s.

- An explanation of the services and staffing the MWA will use to ensure that MSWs will be provided access to the same employment services, benefits, protections, counseling, testing, and job and training referral services received by the general population. This explanation shall include a description of the referral process to MSWs or other appropriate MWA staff.

West Michigan Works! offer MSWs the full range of employment services, benefits, and protections, including counseling, testing, and job training referral that are provided to non-MSWs. The levels of services offered, and a listing of one-stop locations and staffing levels have been previously noted.

Should a MSW job seeker require a referral to or from one of the two State Agriculture Employment Specialist located in the Montcalm County one-stop service center or the Ottawa County one stop service area, the following process is implemented:

- Interested MSW job seekers who call or walk into the Service Center will have a WMW staff member review the appropriate H-2A Job Referral Quick Start Information Guide.
  - WMW will review job posting and required skills/experience required of the position to determine if the MSW job seeker qualifies for the position.
    - If the job seeker *does not* qualify for referral to the position, the MSW job seeker will be provided ES services and be referred to other open employment opportunities.
    - If the MSW job seeker *does* qualify for referral to the position, WMW will review all items on the 2524 Form for that job order found within the ETA 790 with the MSW job seeker.
  - Once the 2524 Form has been completed, it must be signed by the WMW staff member and the MSW job seeker.
  - The qualified MSW job seeker will also be provided a copy of the ETA 790.
  - Contact information for the MSW job seeker is then sent to the appropriate employer for employment consideration by the WMW Business Solutions staff member.
- A description of any other planned services or activities for which Wagner-Peyser funds will be utilized.

Additional planned services or activities utilizing Wagner-Peyser funds include New American Navigator services and staff resources to administer employer assessments and job seeker work ready assessments.

### 18. A description of any navigators being utilized in the local area to provide targeted support and resources to specific groups of individuals with barriers to employment.

WMW also employs a fulltime New American Navigator whose primary responsibility is to assist this growing population navigate through the workforce system and help them connect to needed resources and agencies that can assist with barrier removal. Although this navigator is available for individuals accessing services throughout the region, the home office is in the Kent County Franklin Street Office, the service center who serves the largest percentage of refugees.

Additionally, career navigators in all one-stop centers who are administering employment services are cross trained by the Department of Human and Health Services (DHHS) to aid in the navigation of MI Bridges, a system used by low income families to access Medicaid, childcare assistance, food benefits, health insurance, and dental plans.

### 19. A description of how the local board will coordinate the WIOA Title I workforce investment activities with adult education and literacy activities under the WIOA Title II.

This description shall include how the local board will carry out the review of local applications submitted under Title II consistent with the WIOA Sections 107(d)(11)(A) and (B)(i) and the WIOA Section 232.

Partnerships with adult education and literacy services have been established throughout the seven-county region. These partnerships will continue to strengthen through collaboration and shared goals aimed at increasing education opportunities and credential rates for Michigan residents. WMW has contracted with an Adult Education Coordinator to assist in the coordination of activities, identifying

gaps in Adult Education needs, and help facilitate programs and relationships between the local One-Stop offices and the Adult Ed providers located in each county.

In some areas, adult education providers conduct instruction to individuals in one of our One-Stop Service Centers and in other areas, WMW staff provide employment services in one of the many adult education facilities. When it is not feasible to deliver services utilizing shared space, referrals are made with intentional follow-up to ensure the continued success of the individual.

Review of the local title II applications is completed by two or more members of the WMW workforce development board using a rating system.

## 20. Copies of executed cooperative agreements which define how all local service providers, including additional providers, will carry out the requirements for integration of and access to the entire set of services available in the local One-Stop delivery system.

This includes cooperative agreements (as defined in WIOA Section 107(d)(11)) between the local Workforce Development Board (WDB) or other local entities described in WIOA Section 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) and the local office of a designated State agency or designated State unit administering programs carried out under Title I of the Rehabilitation Act (29 U.S.C. 720 et seq.) (other than Section 112 or Part C of that Title (29 U.S.C. 732, 741) and subject to Section 121(f)) in accordance with Section 101(a)(11) of the Rehabilitation Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination.

West Michigan Works has MOUs in place that define the requirements for integration of and access to all services available within the local one stop delivery system. Please see MOUs attached.

## 21. A description of the entity responsible for the disbursement of grant funds (Grant Recipient).

Area Community Services Employment and Training Council (ACSET) is a Public Agency and the administrative and fiscal agent for WMW. It was initially established under an interlocal Agreement between Kent County and the City of Grand Rapids dated September 23, 1985. ACSET is a separate legal entity and a public body incorporated under Section seven of the Urban Cooperation Act (UCA). Currently ACSET is the Michigan Works! Agency (MWA) for seven counties and is governed by a board consisting of representation from those seven county Commission Boards, as well as the City of Grand Rapids Commission Board.

The WMW Workforce Development Board (WDB) consists of 35 members, which includes representation from the seven counties in Region 4b. Membership includes sector categories, including: Business, Adult Education, Economic Development, Community Based, Higher Education, Vocational Rehab, and Labor Training, Organized Labor and Public Assistance.

## 22. A description of the competitive process that will be used to award the sub-grants and contracts for the WIOA Title I activities.

Sub-grants and contracts are awarded through a request for proposal (RFP) process. The RFP is released on the WMW website, through media outlets, and notification is mailed to current contractors, community partners and other identified potential bidders. The RFP is not released in advance of the scheduled date. A review committee is selected to review proposals, and may include community partners, Workforce Development Board (WDB) members and administrative staff. Proposals are reviewed and rated on a competitive basis according to the criteria stated in the RFP. Sub-recipients selected for funding will be approved in the manner required by WIOA or subsequent legislation.

## 23. The local levels of performance negotiated with the Governor and CEO(s) to be used to measure the performance of the local area and to be used by the local board for measuring the performance of the local fiscal agent (where appropriate), eligible providers under the WIOA Title I Subtitle B, and the One-Stop delivery system in the local area.

Local boards are not required to provide or negotiate performance levels for those measures designated by the U.S. Department of Labor (USDOL) as baseline measures as described in Section II.

WIOA Performance measures were negotiated in Program Year 19/20 and agreed upon. Please refer to the chart provided in question #1.

## 24. A description of the actions the local board will take toward becoming or remaining a high-performing board, consistent with the factors developed by the State Board. For this section local boards shall include:

- Effectiveness and continuous improvement criteria the local board will implement to assess their One-Stop centers.

Through the guidance of the One Stop Operator and Strategic policy consultants, WMW has developed and updated a Strategic Plan Report that engaged numerous stakeholders, including board members and staff, community partners, education and training providers, economic development, employers, and job seekers.

As outlined in the Strategic Plan, specific goals identified to be in alignment with West Michigan Works! Vision, Mission, Values, and Core Competencies are as follows:

- Foster widespread networks to collaboratively address workforce needs in the region.
- Expand the local pipeline of work-ready talent to meet the needs of the workforce and of West Michigan employers.
- Enhance capacity and increase resources by leveraging strengths, successes, and networks.
- Improve engagement across the organization through strategic initiatives, professional development, and a solutions-driven culture.
- Enable a culture that honors the worth and dignity of all people, where staff and customers have equitable access to services and opportunities.

Strategies to achieve these goals have been defined to include customer focused, system focused, capacity building and accountability. Progress, effectiveness and continues improvements are analyzed and updated annually. The most recent West Michigan Works! Strategic Plan Report can be found [here](#).

- A description of how the local board will allocate One-Stop center infrastructure funds.

Funding for the basic infrastructure of the Workforce Service Centers is based on the overhead and fixed costs of each one-stop service center and in consideration of local and partner funding. These are the basic costs of the physical locations and services. Each partner will annually confirm and agree to the number of FTEs providing services in the one-stop. The FTE number will be utilized in the IFA to determine each parties' share of the one-stop cost.

- A description of the roles and contributions of One-Stop partners, including cost allocation.

As previously mentioned, the roles and resource contribution of the one-stop partners are outlined in MOUs that ensure coordination and delivery of services and establish joint procedures to enable all parties to be more fully integrated into the current service delivery system. Please see the attached MOUs.

## 25. A description of how training services outlined in the WIOA Section 134 (Adult and Dislocated Worker) will be provided through the use of individual training accounts, including:

- If contracts for training services will be used.
- Coordination between training service contracts and individual training accounts.

Training funds will be referred to as scholarships, and approvals will be made based on local in demand occupations, giving priority of services to veterans and qualified spouses, individuals with disabilities, individuals who are basic skills deficient, individuals who are low income and youth residing in a high poverty area. Ideally, individuals will have a high school diploma or GED and are both eligible and suitable for training.

WMW does not use a per provider training contract in addition to an Individual Training Account (ITA); however, approved providers must meet the eligibility criteria and performance standards of the Michigan Training Connect (MiTC) to be considered for training services.

When an individual is issued a training scholarship, the training provider is emailed a copy of the approved ITA. This receipt serves as the confirmation of training classes and funding levels approved by WMW. The ITA also includes the release of information to facilitate ongoing communication between the provider and WMW should that be necessary for the overall success of the individual.

- How the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided.

Individuals in need of skill upgrading or other training services will have access to the state and local Labor Market Information (LMI) through various websites and printed materials available in all WMW One-Stop Service Centers. Additionally, service center staff will assist individuals in identifying high demand employment opportunities and the skill or credential requirements needed to obtain available positions.



Local area training providers who are eligible to receive ITA training funds can be found on the MiTC. Participating training providers are required to disclose a description of the offered program, contact information, admission requirements, program duration and cost, training format, credential earned as well as post completion placement rates and median earnings.

Using an identified career coaching model, qualified Career Coaches will assist eligible WIOA individual in navigating through career pathway planning, identifying skill gaps, career exploration, high demand training program options, training provider requirements, FAFSA, and placement rates but will not endorse or recommend one training provider over another.

## 26. A description of the process used by the local board, consistent with Section III, to provide a 30-day public comment period prior to submission of the plan, including an opportunity to have input into development of the Local Plan, particularly for representatives of businesses, labor organizations, and education.

West Michigan Works! partners, including job seekers, state agents, economic development organizations, education providers, employers, industry councils, and community-based organizations have worked collaboratively with WMW to identify, develop, and implement the content included in this plan. This work has and will continue to influence inclusive service delivery strategies that address the needs of our changing economy. WMW will notify the public through newspapers and online platforms that a draft of this plan is available for review, and public comments will be accepted directly through the WMW website. All comments will be encouraged and taken into consideration.

Following a final review, an electronic version of this plan will be available on the WMW website for a 30-day public comment period. Printed copies of the plan will be provided upon request.

## 27. A description of how One-Stop centers are implementing and transitioning to an integrated, technology-enabled intake and case management information system for programs carried out under the WIOA and by One-Stop partners.

The local board will continue to use the One-Stop Information Management System (OSMIS) as the primary means of case management. Although there is no system currently in place that would allow for the integrated tracking across one-stop partners, awareness of eligibility and tracking systems are being shared in an effort to reduce the duplication of services.

WMW is committed to sharing our intake process with partners and has offered the same career coach training it provides staff to partners in an effort to reduce differences in approaches to career coaching, forms used, and internal processes.

## 28. A description of the local priority of service requirements.

Per the *Priority of Service Policy 16-06c1*, priority of service will be given to eligible recipients of public assistance, other low-income individuals, and/or individuals who are basic skills deficient when receiving individualized career and training services who qualify for WIOA Adult funding. Veterans and eligible spouses as well as individuals with disabilities and individuals living in a high poverty area will also be given priority of services. Please see attached. WMW will make intentional efforts to reach the priority of service population and make individualized career and training services available. Funding levels for



these services will be monitored and individuals eligible under this priority will be given career services and training approvals before all other eligible individuals.

- Low income will be defined as individuals who received income for a six-month period that does not exceed the higher level of the poverty line or 70% of the Lower Living Standards Income Level (LLSIL)
- Basic Skills deficiency will be assessed through the Comprehensive Adult Student Assessment System (CASAS)
- High-poverty area will be defined as a Census tract; a set of contiguous Census tracts; Indian Reservation, tribal land, or Native Alaskan Village; or a county that has a poverty rate of at least 25% as set every five years using American Community Survey five-year data
- WMW will focus on intentional outreach targeting these groups including the enhancement of partnerships with community partners and organizations who are providing services to these individuals.

### 29. A description of how the local board will coordinate workforce investment activities carried out in the local area with statewide Rapid Response (RR) activities.

Rapid Response is designed to provide an entry point into the workforce system for both dislocated workers and employers. This is a component of a demand-driven system. WMW has an identified lead staff person who is responsible for the coordination of Rapid Response partners and the execution of services. Notifications of a WARN or mass layoff are promptly communicated with LEO, as well as coordinated meeting times and dates. The Rapid Response includes a UIA presentation and a Michigan Works! orientation.

### 30. A description of RR activities.

The RR activities encompass activities necessary to plan and deliver services to dislocated workers to facilitate a relatively quick and unencumbered transition to employment or training, following either a permanent closure or mass layoff or a natural (or other) disaster resulting in a mass job dislocation. The state is responsible for providing RR activities.

The state staff is assigned a geographic territory with the responsibility for the coordination of RR activities between the state and the local area. A Worker Adjustment Retraining Notification (WARN) Act notice typically activates the RR intervention in plant closings and mass layoffs. The WARN Act requires employers with more than 100 employees to provide at least 60 days advance notice of a covered plant closing or mass layoff at a site where the plant closing/mass layoff will affect at least one-third of the workforce and a minimum of 50 employees.

The state monitors media reports and uses a network of local contacts, such as the MWAs, state and local economic development officials, the Michigan Economic Development Corporation, union officials, United Way, and other partners to identify plant closings or layoffs.

- Services included as part of the RR process include:
  - a) Initial RR meeting with the company and union officers (if applicable).

- b) Worker orientation meetings for employees. These meetings include presentations by MWA service providers and provide information on employment services; WIOA-funded career services (basic and individualized) and training services; Trade Adjustment Assistance, if applicable; special population services (Michigan Rehabilitation Services, Veterans' services), and local/community services (United Way, local community colleges, credit union counseling, etc.). Collaboration with other state agencies (e.g., Office of Retirement Services, Friend of the Court) are planned as needed. Michigan Unemployment Insurance Agency representatives may also participate in worker orientation meetings and provide information on how to file/claim unemployment insurance benefits. Establishment and organization of a Joint Adjustment Committee (JAC). A JAC is an ad hoc group of workers and managers who organize to provide adjustment services on behalf of the employees who are about to lose their jobs due to a plant closure or a mass layoff. The purpose of a JAC is to help displaced workers make a successful transition to a satisfactory job or training in the shortest possible time (reference Policy Issuance (PI) 06-12, "Establishment of Labor Management Committees, also known as JACs at Sites of Facility Closures and Mass Layoffs," issued September 26, 2006).
- c) Layoff Aversion IWT, which includes an assessment of the potential for averting layoffs in consultation with the state or local economic development agencies, including private sector economic development entities and other key partners, up to a year in advance of an actual or potential dislocation event. Special attention and reference should be given to the timeframes and activities charted in the USDOL Training Employment Notice (TEN) 9-12. An IWT is the actual employment and training instrument to upgrade and alter skills to maintain employment or transition to similar employment, a preventative measure, to save jobs, increase economic productivity, and decrease the negative impacts of unemployment. Reference the USDOL Training and Employment Guidance Letter (TEGL) 30-09, the USDOL TEN 9-12, and the PI 12-02.
- d) State Adjustment Grants (SAGs) are additional increments to a local area's Dislocated Worker formula funding award to meet documented funding deficits. The MWAs may request additional funding for a single or multiple dislocation event(s) via a SAG, following the application process outlined in the SAG PI 12-32. The process includes review of the application and supporting documents and negotiation with the MWA to finalize the award. The WD reserves the right to award SAGs with specific terms and conditions, including demonstration that the SAG aligns with the Michigan Industry Cluster Approach, an obligation to spend all or part of the SAG by the end of the Program Year (PY) in which it was granted, or other time period as determined by the WD.
- e) National Dislocated Worker Grants (NDWGs) are another form of assistance provided to dislocated workers. The NDWGs are discretionary grants awarded by the Secretary of Labor to provide employment-related services for dislocated workers in specific circumstances. The WD and local MWAs work together to develop the application and project design for an NDWG, in response to a specific dislocation event.
- f) The MWAs shall develop a policy describing how the local WDB will coordinate workforce investment activities carried out in the local area with the aforementioned statewide RR activities provided by the WD to address actual or potential dislocation events, in accordance with the WIOA, Section 134(2)(A) and 20 CFR 682.300 to 682.330. In addition to the general RR elements listed under the subsections above, the policy must include, but is not limited to the following actions:

- i. A listing of the name of the person, title, mailing address, email address, and telephone number primarily responsible for (1) JACs, (2) SAGs, and (3) NDWGs.
- ii. The steps taken to include layoff aversion as a component of RR, whether realized as a policy or a set of procedures in conformity with the USDOL TEGl 30-09, the USDOL TEN 9-12, and the PI 12-02.
- iii. A description of the coordination of layoff aversion with IWT.
- iv. A description of the MWA's role in the function of JACs.
- v. A description of the local circumstances which would activate a request for a SAG (for example, specific level or percent of local dislocated worker formula funding expended, obligated and/or unobligated; specific level or percent of local and/or regional unemployment; the size of an actual or potential dislocation event; the time period between local dislocation events, etc.).

WMW staff works closely with LEO to coordinate Rapid Response activities necessary to plan and deliver services to dislocated workers in order to facilitate a relatively quick and unencumbered transition to employment or training, following an announcement or notification of a permanent closure or layoff, regardless of the number of workers affected, or a natural (or other) disaster resulting in job dislocation.

In accordance with the WIOA section 134 (a)(2)(A) and 20 Code of Federal Regulations (CFR) 682.300 to 682.370, WMW will coordinate, arrange, and provide services as part of Rapid Response (see attached). Steps include:

- Notification of potential event includes notifying LEO of closures or layoffs and coordinating the presence and involvement of local agencies.
- Research and strategy meeting, leading to an initial employer meeting.
- Coordinate the development of an approved plan with employer, LEO and local agencies
- Rapid Response worker orientation sessions
- DW surveys
- Workforce Transition Committees or Joint Adjustment Committees (JACs)
- Peer-to-Peer Assistance, Transition Centers, Job/Career/Education Fairs
- Workshops, including job-seeking skills, resume writing, interviewing, basic computer literacy classes, other computer classes, and remedial education
- Transition to local One-Stop services
- Post-Rapid Response follow-up with employer

WMW has developed a worker orientation presentation outline so that information provided through worker orientation sessions is consistent across our region. During these sessions, subject matter experts address topics that are pertinent to affected workers.

If an employer is unable to hold a Rapid Response or worker orientation in person, WMW offers these meetings virtually. All parties involved (including the employer, LEO, UIA, and relevant community services) meet through a virtual meeting platform and electronic documents are shared. If an employer does not want to hold any virtual worker orientation sessions, WMW sends electronic documents that include UIA information to be shared with workers.

The Business Solutions Unit of WMW will be primarily responsible for the MWA role in the JAC applying for State Adjustment Grants (SAG) or National Emergency Grants (NEG).

*Contact information:*

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As part of the research and initial meeting with the employer, Layoff Aversion will be one of the first topics discussed. A fact finding discussion with the employer will be conducted to determine if training assistance could be helpful and likely to avert layoffs. This option is often appropriate early in the employer's decision-making process. West Michigan Works! works with the employer, LEO, and local agencies (if and when appropriate) to determine if other activities or assistance could be undertaken to accomplish layoff aversion.

If training can assist in averting layoffs, an Incumbent Worker application will be initiated. Fact finding will occur with the employer to determine the type of training necessary for workers who are at risk of being laid off. These efforts will be coordinated by West Michigan Works! in conjunction with the company and any training providers that may be involved. WMW's Rapid Response process is integrated with our *Work Based Training Policy 18-06*.

West Michigan Works! will assist and facilitate, in collaboration with LEO, the workers and company's establishment of a JAC. West Michigan Works! will assist the workers in seeking out candidates to staff and facilitate the JAC, and to participate as support. The JAC is the worker's organization, so all assistance would be to provide information and choices, not to direct or run the JAC.

State Action Grant (SAG) request would be activated when the number of potential laid off workers is significant and existing funding is not likely to handle the request for services without impeding the operation of the Dislocated Worker program elsewhere in the area. Additionally, if the employer request is outside of West Michigan Works! realm of expertise (such as stress or financial counseling) SAG may be requested.



**Title:** WMW 15-03c2  
Workforce Innovation Opportunity Act (WIOA) In and Out-of-School Youth Eligibility

**Effective Date:** 4-22-2019

**Approved By:** West Michigan Works! Workforce Development Board on 4-8-2019  
ACSET Governing Board on 4-22-2019

**Program(s) Affected:** This policy applies to individuals seeking eligibility to participate in the Workforce Innovation Opportunity Act (WIOA) Youth programs

**Scope:** WIOA Youth programs

**Supersedes:** WMW 15-03c1

**References:** WIOA Section 129(a)(1)(B & C); WIOA Rules, 20 CFR 681.300; WIOA Manual

**Policy:** Provisions of career or training services for all WIOA programs is dependent upon the individual's ability to prove authorization to work in the United States. Any individual who cannot demonstrate authorization to work will not be eligible for program enrollment, career or training services and will be referred to appropriate agencies. Efforts to determine authorization to work and/or refer customers to appropriate agencies or offices to assist will be coordinated with Migrant Services. All individuals, regardless of authorization to work, are able to receive self-services through West Michigan Works! service centers.

#### **A. In-School Youth**

An eligible in-school youth is defined, under WIOA section 129(a)(1)(C), as an individual who:

1. Is age 14-21 (or through the age of 25 with a disability) **and**
2. Attending a school (as defined by state law) **and**
3. A low-income individual **and**
4. Has one or more of the following barriers
  - a. A homeless individual, including runaways
  - b. An offender
  - c. A foster care youth including a youth who has aged out of the foster care system or who has attained 16 years of age and left foster care

for kinship guardianship or adoption, a child eligible for assistance under Section 477 of the Social Security Act, or in an out-of-home placement

- d. Pregnant or parenting youth
- e. Basic skills deficient
- f. A youth who is an individual with a disability
- g. An English language learner
- h. Requires additional assistance to complete an educational program or to secure or hold employment

Note: youth who are homeschooled, in alternative education or virtual learners are in-school youth.

## **B. Out-of-School Youth**

An eligible out-of-school youth is defined, under WIOA section 129(a)(1)(B), as an individual who:

1. Is age 16-24 **and**
2. Not attending any school (as defined by state law) **and**
3. Has one or more of the following barriers
  - a. A recipient of a secondary diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner
  - b. A school dropout (age 18+ or 16+ with parent consent)
  - c. A homeless individual, including runaways
  - d. A youth within the age of compulsory (required by law) school attendance, but has not attended school for at least the most recent completed school year calendar quarter
  - e. An offender
  - f. A foster care youth including a youth who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under Section 477 of the Social Security Act, or in an out-of-home placement
  - g. Pregnant or parenting youth
  - h. A youth who is an individual with a disability
  - i. A low-income youth who requires additional assistance to complete an educational program or to secure or hold employment

## **C. Requires Additional Assistance**

Definitions and eligibility documentation requirements regarding the “requires additional assistance to complete an educational program, or to secure or hold employment” criterion must be established at the local level.

The West Michigan Works! Workforce Development Board definition for Youth Who Require Additional Assistance includes the following:

1. GPA less than 2.0 in secondary or post-secondary education
2. Dropping out of post-secondary education
3. Fired from one or more employers (for any reason, including attendance)
4. No employment history
5. An employment history of less than six months for one employer
6. Member of a single parent household
7. Gang affiliation
8. High absenteeism rate from school
9. Responsible for care of siblings or other family members
10. Recreational or addictive use of drugs or alcohol
11. In need of credit recovery
12. Living in rural areas lacking adequate transportation to employment
13. Received an Individual Education Plan (IEP), an accommodation under Section 504 of the Rehabilitation Act of 1973 (also called a “504 Plan”), or an Individualized Plan for Employment (IPE) through Michigan Rehabilitation Services (MRS)
14. Child of an incarcerated parent
15. Victim of human trafficking

#### **D. Five Percent Allowances**

WIOA allows a five percent enrollment exception under two situations:

- Per section 681.250 of the Federal Register, WIOA allows a low-income exception where five percent of WIOA youth may be participants who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA except the low-income requirement.
- Per 681.310 (b) of the Federal Register, not more than five percent of the in-school youth newly enrolled in a given program year may be eligible based only on the “requires additional assistance to complete an educational program or to secure or hold employment” condition.

Both exceptions require the MWA to calculate the five percent exception based on new enrollees for the program year rather than the total caseload. Due to the limited number eligible for the five percent allowance, the MWA reserves the 5% exception determination within the administrative operations. Contractors and direct service youth staff must not enroll youth using either of the five percent exception criteria.



**E. Other Responsible Adult**

For purposes of authorizing a minor to participate in the WIOA programs, the signature of a parent, guardian or other responsible adult is required. Local areas may define “other responsible adult” in order to enroll minors with the authorization of individuals other than a parent or legal guardian.

Other responsible adults shall include the following:

- A relative with whom the individual resides;
- An adult who has been delegated custodial or administrative responsibilities in writing, either temporarily or permanently, by a parent or by an appropriate agency;
- An agency or organization representative who is in a position to know the individual’s circumstances (i.e. clergy, school teacher, probation or other officer of the court or foster parent);
- A representative of an agency which provided services to the individual and who is aware of the individual’s circumstances (i.e. social worker, homeless shelter official, child protective worker, foster worker, or health clinic official).

## **Attachment A: Definitions**

Attending School: An individual attending any secondary school, home school, alternative education, virtual learning or credit bearing post-secondary education. This includes full or part-time and those who are between school terms and intend on returning to school.

Not Attending School: An individual not attending secondary education or credit bearing post-secondary education. An individual attending adult education under title II of WIOA, YouthBuild, Job Corps, high school equivalency or dropout re-engagement programs or those attending non-credit bearing classes are not considered attending school.

Low-Income Individual: A low-income individual must meet one of the following conditions -

- a) Is receiving or is a member of a family that receives, or was determined eligible to receive income-based public support within the prior six months;
  - a. Temporary Assistance to Needy Families (TANF)
  - b. Supplemental Security Income (SSI)
  - c. Refugee Assistance
  - d. Supplemental Nutrition Assistance Program (SNAP)
  - e. Food Assistance Program (FAP)
- b) A member of a family that lives at 100% or less of the poverty threshold or at 70% or less of the Lower Living Standard Income Level (LLSIL)
- c) Receives or is eligible to receive free, or reduced lunch
- d) Qualifies as a homeless individual
- e) Is a foster youth
- f) An individual with a disability whose own income meets the income requirement of the poverty level (item b above), but who is a member of a family whose income does not meet this requirement
- g) Living in a high poverty area

School Dropout: An individual who is no longer attending secondary school and who has not received a secondary school diploma or its recognized equivalent. The term “school dropout” does not refer to individuals who have dropped out of post-secondary education.

Homeless Individual: A homeless individual is defined as an individual who lacks a fixed, regular, adequate night time residence; and any individual –

- Who has a primary night time residence that is a publicly or a privately operated shelter for temporary accommodation;
- An institution providing temporary residence for individuals intended to be institutionalized; **OR**
- A public or private place not designated for, or ordinarily used as, a regular sleeping accommodation for human beings.

Offender: An offender is an individual who is an adult or juvenile –

- a) Who is or has been subject to any stage of the criminal justice process, and for whom services under this Act may be beneficial; or
- b) Who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction

Runaway: A runaway youth is defined as an individual who lacks a fixed, regular, adequate night time residence; and any individual -

- Who has a primary night time residence that is a publicly or a privately operated shelter for temporary accommodation;
- An institution providing temporary residence for individuals intended to be institutionalized; **OR**
- A public or private place not designated for or ordinarily used as a regular sleeping accommodation for human beings.

In Foster Care or Aged Out of Foster Care: Foster care means 24-hour substitute care for children placed away from their parents or guardians and for whom the State agency has placement and care responsibility. This includes, but is not limited to, placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, child care institutions, and pre-adoptive homes. A child in foster care is in accordance with this definition regardless of whether the foster care facility is licensed and payments are made by the State or local agency for the care of the child, whether adoption subsidy payments are being made prior to the finalization of an adoption, or whether there is federal matching payments that are being made.

Pregnant or Parenting Youth: A pregnant or parenting youth is an individual who is between the ages of 14 and 24 years of age and pregnant, or a male or female youth who is providing custodial care for one or more dependent children under the age of 18.

Basic Skills Deficient: Basic skills deficient is defined as an individual –

- a) Who is a youth that has English reading, writing, or computing skills at or below the 8<sup>th</sup> grade level on a generally accepted standardized test; or
- b) Who is unable to compute or solve problems, or read, write, or speak English at the level necessary to function on the job, in the individual's family, or in society, as locally defined with one or more of the following criteria:
  - English is the individual's second language; or
  - Has a social, mental or physical impairment as documented by a physician or other qualified service provider; or
  - Enrolled in remedial courses in post-secondary education; or
  - Lacks the short-term pre-vocational skills (i.e. learning, communication or computer literacy skills) an individual needs to prepare for unsubsidized employment or training, as documented by and in his/her comprehensive assessment; or
  - **On-the-Job Training ONLY: if an individual possesses 50% or less of the skills required to do the job, as indicated by the training outline.**

Family: The term “family” means two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:

- A married couple and dependent children
- A parent or guardian and dependent children
- A married couple

Income: For registration eligibility purposes, income is divided into included income and non-included income.

*Included Income:*

Includes all income *actually received* by the members of the applicant’s family during the income determination period six months prior to application. Only the income for individuals included in the applicant’s family size is considered when determining family income. In addition, the income of these family members is only to be counted during the periods persons are actually members of the applicant's family unit.

\* Included income is income *actually received* by the participant, meaning they have actually received a check stub for hours worked. If an applicant has worked, but has *not* yet received payment, this will **not** be factored as income.

*Included income:*

1. Gross Wages and Salary - The total money received (amount paid before deductions) from work performed as an employee including:

- gross wages and salaries
- tips
- commissions
- piece rate payments (payments based on the number of items/units completed, instead of hours worked)
- cash bonuses
- vacation pay (this includes Armed Forces terminal leave pay)
- Income earned through the senior community service employment program.

2. Net Self Employment Income - Net income (gross receipts - operating expenses = net employment income) from a business firm, farm, or other enterprise (including odd jobs) in which a person is engaged on his/her own account. If net self-employment income reflects a deficit amount, income from the source is to be considered "-0-" when calculating family income. Self-employed includes a farmer, rancher, fisherman, professional person, independent trades person, and other business people.

3. Miscellaneous Income:

- Regular payments from railroad retirement, strike benefits from union funds, worker's compensation, veteran's payments, and training stipends

- Alimony
- Unemployment compensation
- Child support payments
- Military family allotments, excluding allotments for active duty, or other regular support from an absent family member or someone not living in the household
- Pensions whether private, including employer contributing 401(k), **OR** government employee (including military retirement pay)
- Regular insurance or annuity payments
- College or university grants (does NOT include Pell), fellowships, scholarships, and assistant ships
- Dividends, interest, net rental income, net royalties, and periodic receipts from estates or trusts.
- Net gambling or lottery winnings.
- WIOA, On-the-Job Training payments.
- Old Age, Survivors and Disability Insurance benefits including Social Security Disability Income – SSDI, received under Section 202 of the Social Security Act (42 USC 402)

*Non-Included Income:*

- Severance Pay
- Welfare payments (including Temporary Assistance for Needy Families, Supplemental Security Income, Food Assistance Employment and Training Program, and Refugee Assistance)
- Capital gains
- Foster child care payments
- Any assets drawn down as withdrawals from a bank, the sale of property, an employee exclusive 401(k), the sale of property, a house or a car
- Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury
- Non - cash benefits such as employer paid fringe benefits, food or housing received in lieu of wages, Medicare, Medicaid, Food Stamps, school meals, and housing assistance
- Pay or allowances received while on Active Military Duty. (38 U.S.C. 2013)
- Pell grants
- Education assistance and compensation payments to veterans and other eligible persons (Chapters 11, Compensation for Service Connected Disability or Death, 13, Dependence and Indemnity Compensation for Service Connected Death, 31, Vocational Rehabilitation, 34, Veterans' Education Assistance, 35, War Orphans' and Widows' Educational Assistance, and 36, Administration of Educational Benefits. 38 U.S.C. 2013)
- Allowances, earnings, and payments to individuals participating in programs under WIA shall not be considered as income for the purposes of determining eligibility for WIA
- Earned income credit (EIC). (TEIN #35-93)
- Educational financial assistance received under Title IV of the High Educational Act. (20 U.S.C. 1087)
- Needs-based scholarships
- Adoption subsidies

Individual with a Disability: an individual with any disability as defined in section 3 of the Americans with Disabilities Act of 1990 (42 USC 12102)

English Language Learner: An English language learner means an eligible individual who has limited ability in reading, writing, speaking, or comprehending the English Language, and –

- a) Whose native language is a language other than English; or
- b) Who lives in a family or community environment where a language other than English is the dominant language

Age of Compulsory School Attendance: Per Michigan Combined Law 380.1561, for a child who turned age 11 before December 1, 2009 or who entered grade 6 before 2009, the child's parent, guardian, or other person in this state having control and charge of the child shall send that child to a public school during the entire school year from age of 6 to the child's sixteenth birthday. Except otherwise provided in this section, for a child who turns age 11 on or after December 1, 2009 or a child who was age 11 before that date and enters grade 6 in 2009 or later, the child's parent, guardian, or other person in this state having control and charge of the child shall send the child to a public school during the entire school year from age 6 to the child's eighteenth birthday.

High Absenteeism Rate: High Absenteeism will be considered as 10 or more unexcused absences in a school year (10 days or 60 hours).



**Title:** WMW 15-06c4  
WIOA Support Services Policy, including Needs-Related Payments

**Effective Date:** June 8, 2020

**Approved by:** West Michigan Works! Workforce Development Board on June 8, 2020

**Programs Affected:** All Workforce Innovation and Opportunity Act (WIOA) Programs.

**Scope:** This policy provides guidance for providing supportive services to job seekers enrolled in West Michigan Works! WIOA programs and includes provisions to address participant and program delivery needs during COVID-19.

**Supersedes:** WMW 15-06c3

**References:** WIOA Section 3(2); WIOA Section 3(15); WIOA Section 3(59); WIOA Section 129(c)(2)(G); WIOA Section 134(d)(2) and (3); WIOA Rules 680.120; 680.130; 680.900 et. seq. and 681.570; State of Michigan WIOA Manual; Code of Federal Regulations (CFR), Title 48 – Federal Acquisition Regulations; CFR, Title 2 – Grants and Agreements; U.S. Department of Labor, Employment and Training Administration; One-Stop Comprehensive Financial Management Technical Assistance Guide; and State of Michigan Workforce Development Agency Policy Issuance 15-12; Food Assistance Employment and Training (FAE&T) Program Plan Instructions.

**Background:** The Workforce Innovation and Opportunity Act of 2014 (WIOA), provides program guidelines for supportive services and needs-related payments for adults, dislocated workers and youth. All WIOA enrolled adults, dislocated workers and youth may be eligible for supportive services as defined in WIOA Section 3(59). Local Workforce Development Boards, in consultation with one-stop partners and other community service providers, must develop a policy on supportive services that ensures resource and service coordination in the local area.



**Policy:**

This policy provides guidance on the provision of supportive services for eligible program participants. Supportive services may be made available to those in need of additional assistance in order to secure employment, participate in education/training, and/or overcome barriers to full participation. Information regarding the availability of supportive services in the region and referral to those services must be provided to all adults, dislocated workers and youth. Program staff are responsible for verifying the participant's need for supportive services. Supportive services are not entitlement payments and are provided at the discretion of West Michigan Works! staff. Supportive services are provided based on individual circumstances; thus payment made on behalf of one participant may not necessarily be made on behalf of another.

**Supportive Service Categories and Conditions**

**Supportive Service Procurement**

Purchase and procurement of all supportive services must follow ACSET's Procurement Policy.

**Cap:** \$1,000 per participant in a rolling 12-month period.

Supportive services including, but not limited to the below categories may be provided to program participants when:

1. They are an allowable (authorized) program expense;
2. They are necessary to enable an individual to participate in program (employment and training) activities; and
3. Job Seekers are unable to obtain supportive services through other community programs and resources.
4. YOUTH ONLY: May be provided supportive services during the 12 months of follow up to ensure successful transition to employment or postsecondary education.

**Non-reoccurring Work-Related**

- Equipment or tools necessary for employment are eligible with verification of employment and documentation from employer stating the need and list of necessary equipment or tools.

**Equipment for Virtual Participation**

- Devices such as laptops, tablets or chrome books may be necessary for individuals to participate in online workshops, events, or trainings. Individuals may be provided such equipment when assigned to virtual activities or trainings and have a demonstrated need.

**Internet Accessibility**

- Participants may be provided internet accessibility, such as prepaid data cards or Hot Spots, when needed for online workshops, events, or trainings to ensure their access and ability to participate in assigned virtual program services.

**Employment and Training Related Medical**

- Immunizations
- Physicals
- Mental health assessments
- Optical (including eyeglasses)
- Dental services

**Clothing (\$300 max)**

- Interview clothing
- Uniforms
- Boots/shoes
- Other work/training-related clothing

**Automobile**

Allowable vehicle expenses may be provided when the vehicle is registered to the participant or the participant’s family, as defined in the WIOA Manual definition of “family”.

- Vehicle repairs
- Inspection costs
- Auto insurance
  - A new auto insurance policy will not be provided for longer than three (3) months.
- Plates and registration.

***NOTE: Penalty-related fees and fines are not allowable expenses.***

**Childcare (\$120 per week max)**

Allowable childcare costs may be provided to those who are employed or in an approved training. Costs must be paid to a licensed daycare provider or MDHHS License Exempt provider. The Job seeker must apply for childcare assistance through MDHHS to be eligible for this support service. Regardless of the assistance determination, WIOA funding may either support the childcare costs or supplement MDHHS funded childcare up to the cap amount, if necessary.

### **Transportation (\$100 per week max)**

Allowable transportation includes:

- Mileage reimbursement
- Bus passes
- Taxi or other transportation services (i.e. Uber, Lyft, etc.)

Transportation support may be provided to participants traveling to and from:

- An approved training program – up to participant cap
- Work experience – up to participant cap
- Unsubsidized Employment – ONLY first 6 weeks – up to participant cap
- YOUTH ONLY: Transportation support may be provided to assist with travel to job search, workshops/event attendance or Career Coach meetings – up to participant cap

When found reasonable and necessary, participants who are dual-enrolled with the FAE&T program may also receive transportation when traveling to and from assigned activities.

### **Testing & Document Fees**

- Birth Certificate and Identification Card
- ICHAT and Drug Screening
- Application, testing (academic and occupational), permits and license fees when not included in an Individual Training Account (ITA)
- Driver's training, testing and licensing

***NOTE: Penalty-related fees and fines are not allowable expenses.***

### **Needs-Related Payments**

Needs-Related Payments (NRPs) are defined as financial assistance in a stipend form provided to participants for the purpose of enabling unemployed participants to participate in training. Needs-Related Payments will only be available if required by a program or funding source.

### **Documentation**

Supportive service provision must follow the WMW Support Service Staff Guide which provides guidance regarding documentation, justification, Individual Employment Plan/Individual Service Strategy (IEP/ISS) coordination, data entry and case noting.

### **Waivers or Exceptions**

In cases with unique circumstances, when a Career Coach determines it would be beneficial to exceed a cap amount or provide support services not categorized in the local policy, a waiver request may be made on a case-by-case basis, per WMW Staff Guide procedures.



<b>Title:</b>	WMW 16-06c1 Priority of Service
<b>Effective Date:</b>	August 28, 2017
<b>Applicability:</b>	Workforce Innovation and Opportunity Act (WIOA) Programs Trade Adjustment Assistance (TAA) Programs
<b>Scope:</b>	Veterans' priority of service means that veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training, and placement services provided under a qualified job training program. Veterans' preference applies to all USDOL-funded employment and training programs, including programs funded under WIOA and the Trade Act of 1974, as amended, not just when a local area is in limited funds status. Federal law requires that the individual receiving priority must first meet the program's existing eligibility requirements. In addition, the Workforce Innovation and Opportunity Act of 2014 (WIOA) Sec. 134(c)(3)(E) requires priority be given to "public benefits recipients, other low-income individuals, and individuals who are basic skills deficient" when providing individualized career and training services using WIOA Title I Adult funds.
<b>Supersedes:</b>	WMW X16-06 Priority of Service February 1, 2017
<b>Reference:</b>	Jobs for Veterans' Act P.L. 107-288, 20 CFR Part 1010 and Policy Issuance #04-26 Change #3 Implementation of the Veterans' Priority Provision of the Jobs for Veterans Act, The Workforce Innovation and Opportunity Act (WIOA) Public Law 113-128 Section 134 (c) (3) (E), Draft WIOA Manual July 2015. 20 CFR 680.600; 20 CFR 680.640; 20 CFR 680.650; 20 CFR 683.230; 38 U.S. Code Part 4213, TEGL 18-11, TEGL 26-13. Trade Adjustment Assistance (TAA) Manual sec. 1-9, TEGL 10-09 and TEGL 22-04.
<b>Policy:</b>	Priority of service for individualized career and training services funded through Title I WIOA Adult funds will be applied to all WIOA eligible public benefits recipients, other low-income individuals, and individuals who are basic skills deficient, and veterans' priority for covered persons, as defined by the Jobs for Veterans Act, will be applied for those services as well. Veteran's priority of service for covered persons will also be given for TAA services offered under the Trade Act, and basic career services and services to Dislocated Workers under WIOA. This policy defines both the applicable eligibility requirements for priority of service as well as the order in which priority will be applied.



- Title:** WMW 18-06 Work Based Training Policy
- Effective Date:** August 27, 2018
- Approved by:** West Michigan Works! Workforce Development Board on 8/13/2018  
Area Community Services Employment and Training (ACSET) Governing Board on 8/27/2018
- Programs Affected:** WIOA Adult, Dislocated Worker, & Youth Programs and PATH Program
- Supersedes:** WMW 15-09 Workforce Innovation and Opportunity Act (WIOA) On-the-Job Training (OJT) Policy, WMW 15-05 Incumbent Worker Training (IWT) Policy & Guidelines, WMW 16-05 WIOA Work Based Training Policy
- Reference:** Workforce Innovation and Opportunity Act (WIOA) Manual; Training & Employment Guidance (TEGL) 15-10; 20 CFR 680.700 et seq.; PATH Manual, Chapter 7: PATH Work Participation Requirements; 45 CFR 261.30 et seq.
- Background:** This policy applies to agreements with public or private employers who will train participants pursuant to Work Based Training Agreements: On-the-Job Training (OJT), Customized Training, Incumbent Worker Training, and Registered Apprenticeships under the Workforce Innovation and Opportunity Act (WIOA) and On-the-Job Training (OJT) under the Partnership, Accountability, Training, and Hope (PATH) program. The policy includes a strategy to implement Work Based Training Agreements administered by West Michigan Works!
- Policy:** This policy outlines the various types of work based training agreements that may be executed in the region and the strategy to implement them.

Strategy to Implement Work Based Training Services

Work-Based Training Services can be an effective training strategy to provide opportunities for participants and employers in both finding high-quality work and in developing a high-quality workforce. Training is employer-driven and defined as Customized Training, On-the-Job Training (OJT), Incumbent Worker Training, and Registered Apprenticeships (RA).

*West Michigan Works! is a division of ACSET, an Equal Opportunity Employer/Program & a proud partner of the American Job Center network. Auxiliary aids and services are available upon request to individuals with disabilities. Supported by the State of Michigan.*

The general goal is continued unsubsidized employment upon completion of training. The Business Solutions Unit will work directly with local employers in order to best assess their training, recruiting and retention needs, and develop appropriate solutions as needed.

Work based training may be appropriate to implement when:

- There is a reasonable expectation of continuing employment with the employer training the participant.
- The applicant lacks the specific skills required for the job and the employer will provide training to insure the participant obtains the identified skills. Individual assessment of the participant's current skills and previous work history will be conducted to determine participant need.

#### Outreach Strategy

Outreach to employers is conducted both directly and indirectly. Through the demand-driven system, the Business Solutions Unit is able to work directly with employers, as well as within industry specific clusters, to better identify specific training and hiring needs throughout major industry clusters. This approach allows for streamlined recruiting and training in relevant fields for jobs that are currently in high demand, as well as best utilizing Business Solutions Unit's time and resources. Development of industry clusters has allowed cohesive dialogue by employers within the same industry to express needs and concerns openly and address solutions appropriately. Direct outreach is also conducted through one-on-one fact finding meetings with a Business Solutions Representative and an employer. Presentations and outreach surveys are conducted with local chambers, human resource associations, and with state and local economic developers and community partners to spread West Michigan Works' outreach.

Job seekers are also educated through career coaching on employment and training options made available to eligible individuals with priority of service given to adults who are identified as low income, basic skill deficient or a qualified veteran or spouse of a veteran.

Awareness of activities leading to work based programs is promoted through social media sites, local school boards, community colleges, community partners, job fairs, on-site and community workshops, West Michigan Works! Career Coaches, employer participation, and strategic events organized to target a larger audience such as MiCareerQuest, a region wide career exploration event for youth ([www.micareerquest.org](http://www.micareerquest.org)).

In WMW's demand-driven system, employer engagement results in:

- Employers identifying industry demand and vacancies
- Employers providing direct input into the design of educational program offerings that directly respond to industry identified demand, and curriculum that addresses occupational skill requirements (work-based learning)
- Alignment of State and local services and programs with industry's need for workers and skills
- Michigan Training Connect (MiTC), includes programs representing high-demand occupations based on input from employers
- Michigan Industry Cluster Approach (MICA Strategy) is being utilized to increase employer-sponsored trainings, obtain accurate data on in-demand jobs and skill gaps, and establish a strategic training fund to sustain the demand-driven workforce system.

### **Customized Training**

Customized training is designed to ensure that training meets the unique needs of the jobseekers and employers or groups of employers. Customized training is to be used to meet the special requirements of employer or group of employers and conducted with a commitment by the employer to employ all individuals upon successful completion of training. Employers must pay 50% of the training costs.

For employed workers to qualify for customized training, the employee must not be earning a self-sufficient wage or wages comparable to or higher than wages from previous employment as determined by the Workforce Development Board (WDB) policy WMW 15-04c1, WIOA Adult and DW Eligibility. Additionally, the training must incorporate new technologies, processes, or procedures, skills upgrade, workplace literacy, or other appropriate purposes.

### **On-the-Job Training**

OJT training can assist employers who are looking to expand their businesses and who need additional staff trained with specialized skills. OJT is primarily designed to first hire the participant and provide the participant with the knowledge and skills necessary for the full performance of the job. Prior to approving an OJT, potential participants will be assessed by a career coach to ensure they are eligible for the program and suitable for the training. The Business Solutions Unit shall target occupations for OJT that are defined by the Workforce Development Board, as high demand in



the area with wages that are equal to, or greater than, the current labor market occupational wage for the applicable job title and which align and support the Michigan Industry Cluster Approach.

#### Participant Eligibility

A Business Solutions Representative in conjunction with Talent Solutions staff will assess an occupation's specific vocational preparation, the participant's academic and occupational skill level, prior work experience and the Individual Employment Plan (IEP) or Individual Service Strategy (ISS). The results will be used to determine the appropriateness of and suitability for the OJT, along with determining the duration of the training.

No OJT subcontract may be written with a company if the participant is currently employed, or has been employed at any time, by that firm in the same, similar, or upgraded job classification unless:

- An eligible employee is not earning a self-sufficient wage and the OJT is for a self-sufficient wage, as determined by the Workforce Development Board (WDB) or State policy;
- The training relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other purposes identified by the WDB; and
- The employer complies with WIOA regulations and this policy.

#### Employer Eligibility

All employers in public, private non-profit or private sector must be capable of providing the on- the-Job training described in the OJT training plan. Prior to entering into an OJT agreement with an employer, the Business Solutions Representative shall conduct a fact finding meeting to ensure that the employer meets the minimum standards and can provide both training and long-term employment to an OJT participant. The employer may hire OJT employees for training using only the approved West Michigan

Works! Model Training Agreement or an agreement approved by West Michigan Works!

- Participants must be employed only in positions which are classified as permanent and full-time, defined as a minimum of thirty (30) hours per week or an average of thirty-two (32) hours per week for each (4) week period.
  - A participant with a documented disability may be employed part-time, if their disability is related to the position, as defined by law, or if the reduced schedule is a bona fide accommodation to the disability.
- Employers must offer wages, benefits, and working conditions that are equal to those provided to regular employees who have worked for a similar length of time and are doing the same type of work.
- The employer must comply with all applicable federal, state, and local laws and regulations providing safe and clean working conditions.
- The employer must certify that it has not relocated any part of its business from any location in the United States, in the last 120 days, which relocation resulted in the unemployment of any of its employees at the former location.
- The employer must agree to release all documentation as outlined in the OJT Agreement.
- The employer must not be experiencing any abnormal labor conditions, such as a strike, lockout, or similar conditions.
- The employer training position covered by an OJT contract must not have been created by the displacement of employed workers in the same or similar position.
- Employers shall provide appropriate Workers Compensation protection and unemployment insurance to OJT participants.
- After successful completion of the required training, the employer must agree to hire and retain the participant, on the same terms as its other newly hired employees in similar positions.
- The position's compensation must not be dependent primarily upon commissions or tips.

In determining employer eligibility for multiple contracts, the following circumstances need to be considered:

- The employer has demonstrated "satisfactory performance" in previous OJT or other training programs.
- If the employer has failed to exhibit a pattern of providing participants with long-term employment and/or comparable labor market wages the employer will be disqualified from West Michigan Works! OJT program for one (1) year. After the one-year disqualification, the employer may again be evaluated for OJT program participation if a good faith effort has been made to correct previous problems.

A participant may be placed in an OJT position through a personnel or staffing agency, provided that:

- The Business Solutions Unit of West Michigan Works! reviews turnover patterns in such positions of the host employer and determines that there is a good chance of long-term continued employment at the worksite;
- The pay rate for the OJT participant meets State and local requirements, and benefits for the OJT employee would be equal to similarly employed persons;
- The host employer, the staffing agency, and WIOA-eligible participant all must sign the OJT employer agreement; and
- The reimbursement check is payable to the employer that provides the training and is exclusive of any fees paid to the staffing agency.

#### Contract Instrument

West Michigan Works! Business Solutions Representatives and its contractors shall use the appropriate version of the West Michigan Works! Model Training Agreement, or an agreement approved by West Michigan Works!. West Michigan Works! has detailed contracts with all contractors authorized to train participants under OJT programs, which contracts specify the terms and conditions of such programs. All OJT Agreements

with employers include the following elements:

- Each position is individually negotiated with the employer. Length of training time must be limited to the period required for the participant to become proficient in the occupation for which he or she is being trained, and will be determined based on the applicant's current skills, previous work history, skills required for the position, level of job difficulty, participant's IEP or ISS, and the United States Department of Labor's Occupational Information Network (O\*NET) suggested training time
- Each OJT Subcontract specifies the skills to be learned, the participant's initial proficiency level in each skill, and the estimated number of training hours to be used to teach each skill, as well as the approximate total amount of time to be used for training.
- OJT employers shall be reimbursed for the costs associated with training OJT employees at the rate indicated in the contract, which shall not exceed an amount equal to 50% of the straight-time hourly wages paid to the employee for hours actually worked, excluding overtime, holiday, sick pay, or commissions (from start date until completion of training period). Reimbursement to employers shall be managed by a system that clearly documents the number of hours worked each day by the participant and rate of pay for the time period. Supporting documents must be signed by both the participant and the employer or only by the employer if accompanying documentation (timesheets/time cards) is signed by the participant.
- OJT participants may not commence employment in a position covered by the OJT subcontract prior to the effective date of the subcontract, except as outlined under the Participant Eligibility section of this policy.

The following employer eligibility and OJT contract requirements

will be reviewed by a Business Solutions Representative, with the employer, prior to an OJT agreement, using the OJT Pre-Award Employer Checklist. The position and worksite must comply with the following standards:

- No participant shall be trained under an OJT subcontract when the position is funded in whole or in part with other Federal or State funds. A participant may be trained under an OJT subcontract when the position is funded in whole or in part with local public funds only with the written authorization of West Michigan Works!
- No OJT program may impair an existing contract for services or collective bargaining agreement. Any OJT contract for a position which is covered by a collective bargaining agreement must be authorized in writing by the labor organization involved.

OJT subcontracts may be extended beyond the original completion date if:

- The participant did not obtain necessary skills during the original training period, based on his or her needs.
- The extension of the original subcontract would not exceed the allowable length of training specified for the job in the United States Department of Labor O \* NET Specific Vocational Preparation guidelines, unless individual circumstances warranting such an extension are documented; and
- The extension is authorized in writing by West Michigan Works! Business Solutions Management.

#### Monitoring

- West Michigan Works! monitors OJT contracts once each program year for general compliance issues, including reviews of records and files. West Michigan Works! monitoring staff write reports which describe

problem areas needing corrective action. West Michigan Works! shall make and retain records of OJT employers which do not comply with their contracts and require corrective action when necessary.

- West Michigan Works! staff review OJT contracts with employers, particularly with respect to wages, training length, and training outline.
- All OJT worksites are monitored by a Business Solutions Representative writing the contract with the employer prior to execution of the OJT Blanket Contract. Monitoring visits include review of the worksite for health and safety issues and working conditions; review of and assistance with billing and record-keeping procedures; and review of the participant's progress utilizing the training outline.
- Follow up evaluations with the employer to ensure that training is successfully being delivered will be completed by the Business Solutions Representative at the mid and end point of the contract.

### **Incumbent Worker Training**

In an effort to be more responsive to the needs of local employers, West Michigan Works! utilizes WIOA funding to provide incumbent training solutions to employers of West Michigan Region 4b. Incumbent Worker Training is designed to ensure that employees of a company can gain the skills necessary to retain employment or avert a layoff and must increase both the participant's and a company's competitiveness. Incumbent Worker training is designed to meet the special requirements of an employer (including a group of employers in partnership with other entities) to retain a skilled workforce, or to avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment. This policy includes a description of local and or regional layoff aversion strategies and services being utilized in our region. It addresses the requirement of using Incumbent Worker training as part of the demand-driven strategy.

Business Solutions Representatives from West Michigan Works! will conduct fact finding sessions with employers to determine pre-eligibility of training grant request(s). An application and training plan is completed by the employer as a single point of reference to establish that the company's training needs. It will document details of the training being requested, name of training provider(s), trainees, time period, and cost.

Once a determination for approval is made, a contract between West Michigan Works! and the employer will be completed. The employer, or group of employers, must pay for 50% of the cost of training incumbent workers. The portion of the training cost is the non-federal share of the cost of providing the training. Employers are required to contribute their share of the training costs. Employers may receive up to \$25,000 reimbursement for incumbent worker eligible training per program year. Through continuous outreach through our industry councils, employers who have utilized the grant in prior years, and promotion of the grant to new employers through Chamber Events, Job Fairs, employer seminars, local partners, and networking events in the region, the Business Solutions Unit encourages the use of this grant for employers needing to advance the skills level of their employees or avoid layoffs.

#### Employee Eligibility

Eligible workers employed by local companies are defined as workers who are:

- currently on the payroll of the applicant employer for no less than six months
- meet the Fair Labor Standards Act requirements for an employer-employee relationship

In the event that the IWT is being provided to a cohort of employees, not every employee in the cohort must have an established employment history for six or more months, as long as the majority of employees within the cohort do meet the requirements. An Incumbent Worker does not necessarily have to meet eligibility requirements for career and training services for adults and dislocated workers under the WIOA, however, a WIOA pre-registration and documentation form verifying that the worker meets program eligibility criteria of age, citizenship/right to work, and compliance with Selective Services registration requirements must be obtained. The West Michigan Works! Business Solutions Unit will be responsible for determining the employee's eligibility and training attendance records, training and instruction coordination, and the submittal of claims.

#### Employer Eligibility

All Michigan employers that have at least one full-time employee, are financially viable, and current on all state tax obligations are eligible.



Businesses will be required to provide a minimum of 50% of the requested direct training costs, tuition, and textbooks and manuals.

Priority will be given to businesses in the following targeted sectors: agribusiness, energy, healthcare, information technology and manufacturing where additional training will represent a significant upgrade in employee skills, and/or businesses whose request for training represents a layoff avoidance strategy.

#### Eligible Training

Incumbent Worker Training activities may include the following types of training:

- **Occupational Skills:** Training designed to meet the special requirements of a business or a group of businesses, and is conducted with employer commitment to continue to employ all participants upon successfully completing their training. It is a training instruction conducted in an institutional setting or worksite setting designed to provide or upgrade individuals with technical skills and information required to perform a specific job or groups of jobs such as auto mechanics, health services, or clerical training, etc.
- **Skill Upgrading and Retraining:** Training provided to individuals whose skills have been rendered obsolete or outdated by the development of new technologies or processes. Retraining is provided to those individuals whose skills are not transferable and require new skills set to maintain or obtain employment.

Training is provided to equip individuals to retain employment. Under the WIOA, training services include a structured regimen that leads to specific outcomes. A program of training services is one or more courses or classes, or a structured regimen that leads to:

- a) A recognized post-secondary credential, or its equivalent;
- b) Employment; or
- c) Measurable skill gains toward such a credential or employment.

The following are examples of the type of training that is not allowable:

- CPR and First Aid
- New hire orientation
- Diversity and Sexual Harassment
- Degree programs
- Training that takes places as part of a conference or other event where food and/or beverages are included.
- Training that includes equipment (such as iPads or other equipment/supplies/devices that can be used outside of training) in the cost of the training.

Documents required prior to employer reimbursement:

- Incumbent worker participants are subject to selection for the federally mandated data validation. Therefore, all documentation requirements apply to incumbent workers.
- A verification of qualification or competence issued to an individual by a third party in recognition of an individual's attainment of measurable technical or occupational skills, necessary to obtain employment or advance within an occupation. These technical or occupational skills are generally based on standards developed or endorsed by employers.

#### Eligible Training Providers

Training services may be provided through local community colleges, school districts, area vocational-technical centers, state universities, licensed and certified post-secondary private institutions, and from subject-matter experts and consultants.

Training can be conducted at the business' own facility, at the training provider's facility, or at a combination of sites.

#### Lay off Aversion

Layoff aversion is a comprehensive approach that allows an assessment of the economic situation in a given area. Layoff aversion strategies and activities will be offered to employers to prevent, or minimize the duration of, unemployment resulting from layoffs. Strategies will be customized to allow for quick deployable tactics that are informed by economic data and inclusive of multiple partners. When appropriate, WMW will assist the employer with Incumbent Worker Training (IWT)

program or other work up-skilling approaches.

The West Michigan Works! Business Solutions Unit will maintain a strong diverse network with local Economic Development, education providers, business associations, and other State and local government organizations in order to continue to effectively service employers. This Rapid Response network will be committed to ongoing strategic planning and data gathering that will play a key role in the management of economic transition. The widest array of services possible will be provided based on the needs of the workers and employers. These services include:

- Access to real-time information on layoffs and growth, as well as information on available skilled workers for growing companies.
- Early warning networks and systems to understand economic transition trends within industries, communities, or at specific employers, and plan strategies for intervention when necessary and appropriate.
- Informational and Direct Reemployment Services offered for affected workers.
- Provision of information and access to unemployment compensation benefits and programs, comprehensive one-stop services, and employment and training activities (including information on the Trade Adjustment Assistance Program, Pell Grants, the GI Bill and other Resources).
- Solutions for Businesses in Transition; Growth and Decline.
- Adjustment Retraining Notification (WARN) Act notice.

Targeting and Aligning Layoff IWT within a Demand-Driven Strategy:

Providing IWT is one of the most common strategies employed by practitioners to assist companies in regaining economic health. Small to mid-sized companies or businesses unable to provide resources toward training required as a result of technology or workforce changes(s) may become vulnerable or “at-risk.” Demand-driven strategies can provide the linkages with and resources to assist with job retention and lay off

aversion efforts. Partners include community based organization, economic developers, rapid response staff, financial institutions, chambers of commerce, educational institutions, trade organization, councils, or associations. The objective of the demand driven system is to adapt the workforce to help ensure the supply of workers with skills and competencies that better align with industry, and thus increase employment and retention.

### **USDOL Registered Apprenticeships**

USDOL Registered Apprenticeship is a national training system that combines paid learning on-the-job and related technical and theoretical instruction in a skilled occupation. USDOL Registered Apprenticeships offer jobseekers immediate employment opportunities that usually pay higher wages and offer continued career growth. Certifications earned through Registered Apprenticeship programs are recognized nationwide as portable industry credentials. The primary apprenticeship certification is a certificate of completion, awarded at the end of the apprenticeship. Many programs also offer interim credentials and training certificates based on a competency model that leads to a certificate of completion.

West Michigan Works! is dedicated in increasing the skilled labor market in West Michigan through development of Registered Apprenticeships. Building apprenticeships in which the WIOA agency/workforce intermediary is the backbone organization positioned in the region to focus on collaborative work among area employers/competitors. West Michigan Works! acts as the “sponsor” for employer demand apprenticeship program development by allowing for more employer participation across the region.

- As the program Sponsor, WMW is the liaison between employers and the Department of Labor making program development and administration seamless for employers.
- WMW facilitates collaboration with employers, local community colleges and training providers to develop the best supporting curriculum with flexibility to meet individual company needs.
- WMW’s connections with high school apprenticeship feeder programs and other community resources assist in development of a talent pipeline.
- WMW can provide recruitment and assessment of candidates so they are apprenticeship ready.
- Our industry apprenticeship consortiums provide a forum to collaborate and share best practices with other employers in each industry.

- Employers have access to funding to help support their apprenticeship program.

West Michigan Works! Business Solutions and the Apprenticeship Coordinator, have created a robust engagement between USDOL Registered Apprenticeship and the public workforce system to include the incorporation of USDOL Registered Apprenticeship into strategic planning, service design, and service delivery. The development of apprenticeship programs with WMW as the program sponsor has led to an accelerated advancement and growth of the industry sector councils.

Eligible participants may use Individual Training Accounts (ITAs) to pay tuition for USDOL Registered Apprenticeships. OJT contracts may be written with USDOL Registered Apprenticeships or participating employers in USDOL Registered Apprenticeship programs for the OJT portion of the program, consistent with the requirements under the 20 Code of Federal Regulations (CFR) 680.710 and 680.740(b).

There is no federal prohibition on using both Individual Training Account (ITA) and OJT funds when placing participants into a USDOL registered apprenticeship program. 20 CFR 680.330 provides further information on using ITAs to support participants in registered apprenticeships.

### **Priority for Service under WIOA Title I Adult funds:**

Priority for individualized career services and training services under WIOA Title I Adult funds must be applied to adult recipients of public assistance and other low income individuals, and/or individuals who are basic skills deficient.

Individuals who are interested in receiving career and training services under the local priority of service system must first be determined eligible for the service requested.

Individuals who are not in a priority of service category but are actively enrolled in a career or training service will be allowed to complete the activity. It is not expected that non-priority service participants must give up their place to an individual who is in a priority of service category and may be just starting a career and/or training service.

**Basic Skills Deficient:** West Michigan Works! (WMW) has defined basic skills deficient as the same for adult and youth participants, namely, an individual that has English reading, writing, or computing skills at or below the 8th grade (8.9 or lower) level. It also includes a youth or adult, that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society. Basic skills deficiency will be determined using an objective, valid and reliable assessment, such as the Test for Adult Basic Education (TABE). Refer to TEGL 18-11, Youth Literacy and Numeracy Gains, for further information on testing.

If the priority of service determination is based on the basic skills deficient criteria, the job seeker file must contain academic tests (including the job seeker's name, date of test, and results).

**Low-Income Individual:** An individual who meets any one of the following criteria satisfies the low-income standard for priority for WIOA adult individualized career services and training services:

1. Receives, or in the past six months has received, or is a member of a family that is receiving or in the past six months has received, assistance through the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Supplemental Security Income (SSI) program or state or local income based public assistance;
2. Receives an income or is a member of a family receiving an income that, in relation to family size, is not in excess of the higher of the current U.S. Department of Labor 70 percent Lower Living Standard (LLS) Income Level or the U.S. Department of Health and Human Services (HHS) Poverty Guidelines;
3. Is a homeless individual as defined in §41403(6) of the Violence Against Women Act of 1994, or a homeless child or youth as defined in §725(2) of the McKinney-Vento Homeless Assistance Act;
4. Receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell National School Lunch Act;
5. Is a foster youth on behalf of whom state or local government payments are made; or
6. Is an individual with a disability whose own income meets: WIOA's income requirements, even if the individual's family income does not meet the income requirements; or The income eligibility criteria for payments under any federal, state, or local public assistance program.

## Military Pay and Benefits:

All pay and/or financial allowances earned while a veteran was on active duty must be disregarded when determining whether the veteran is a “low income individual” for the purpose of applying the rule of priority for low – income persons under Title I of WIOA in this policy. Title 38 U.S.C. 4213 also exempts from inclusion in “low income” calculations any financial benefits received by a covered person under the following Chapters of Title 38 of the U. S. Code:

- 11. Compensation for service-connected disability or death;
- 13. Dependency and indemnity compensation for service-connected deaths;
- 30. All-volunteer force educational assistance program;
- 31. Training and rehabilitation for veterans with service-connected disabilities;
- 34. Veterans Educational Assistance
- 35. Survivors’ and dependents’ educational assistance; and
- 36. Administration of educational benefits.

Also excluded from “low income calculations” are benefits received under Chapter 106 of Title 10 of the U. S. Code, Educational assistance for members of the selected reserve.

However, pension payments authorized by Title 10 of the U. S. Code, such as those received by military retirees, whether or not their retirement was based on disability, and pension benefits paid under Chapter 15 of Title 38 of the U. S. Code, are **not** exempt from being included in the calculation of low income.

Also, veterans and eligible spouses are not required to coordinate their entitlement to VA benefits for education and training benefits with any concurrent eligibility they may have for WIOA funded training. West Michigan Works will not require veterans or eligible spouses to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training.

## **Veterans Priority:**

The regulations specify that the definition for veteran specified at 38 U.S.C. 101(2) applies across all qualified job training programs for the purpose of priority of service. That definition includes two key criteria:

1. Service in the active army, marines, naval including coast guard, or air service; and,
2. Discharge under conditions other than dishonorable.

**Veteran:** Under this definition, the term “veteran” means a person who served at least one day in active military, naval or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service includes full-time Federal service in the National Guard or a Reserve component. This definition of “active service” does not include full-time duty performed strictly for training purposes, nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities (i.e. in response to natural disasters).

**Priority of service:** Priority of service means the right of eligible covered persons to take precedence over eligible non-covered persons in obtaining services.

- The covered person receives access to the service or resource earlier in time than the non-covered person; or

- If the service or resource is limited, the covered person receives access to the service or resource instead of or before the non-covered person.
- The regulations specify how priority of service is to be applied across three different types of qualified job training programs:
  - Universal access programs that do not target specific groups;
  - Discretionary targeting programs that focus on certain groups but are not mandated to serve target group members before other eligible individuals; and,
  - Statutory targeting programs that are mandated by federal law to provide priority or preference to certain groups.

**Covered Person:** The term “covered person” means a veteran or an eligible spouse, as defined herein.

**Eligible Spouses:** The regulation specifies spouses of any of the following veterans:

1. Any veteran who died of a service-connected disability;
2. Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
  - a. Missing in action
  - b. Captured in line of duty by a hostile force; or
  - c. Forcibly detained or interned in line of duty by a foreign government or power;
3. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
4. Any veteran who died while a disability was in existence. A spouse whose eligibility is derived from a living veteran or service member (i.e., categories 2 or 3 above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

Consistent with TEGL 26-13, the definition of “eligible spouse” includes same-sex spouses. Eligibility for WIOA Title I services incorporates the definition of family where low-income priority of service is a consideration. Consistent with ETA’s policy, same sex spouses are included within the definition of family. Interpreting “husband” and “wife” as gender neutral in the definition of “family” could impact an individual’s family income calculation.

**Implementing Priority of Service:**

West Michigan Works! will remain intentional in conducting outreach to priority populations to ensure that covered persons, low income and basic skill deficient individuals receive the employment and training services they need.

Outreach will include but is not limited to; informing areas of the community that are likely to have priority populations of the services available; collaborating with social service agencies and other community partners that serve a similar population, creating opportunities to present information on-site at neighborhood events and when permitted, scheduling individual appointments alongside of WIOA required partners to reduce transportation needs and associated barriers.



The individual seeking career or training services under priority of service must be identified and categorized prior to enrollment. Priority of service is initiated on the local level and must follow the standard procedure outlined below:

- A. Priority for individualized career services and training services funded through Adult funds under Title I of WIOA will be applied in the following order:
  - 1. Covered Individuals (Veterans and eligible spouses) who are low-income, recipients of public assistance or are basic skills deficient.
  - 2. Individuals (non-covered) who are low-income, recipients of public assistance, or are basic skills deficient.
  - 3. Covered Individuals (Veterans and eligible spouses) who are NOT low-income and are NOT recipients of public assistance or basic skills deficient.
  - 4. All other eligible individuals.
  
- B. Priority for basic career services and services for Dislocated Workers under WIOA; and TAA services for adversely affected workers under the Trade Act of 1974, as amended, will be applied in the following order:
  - 1. Covered persons (veterans and eligible spouses).
  - 2. All other eligible individuals.