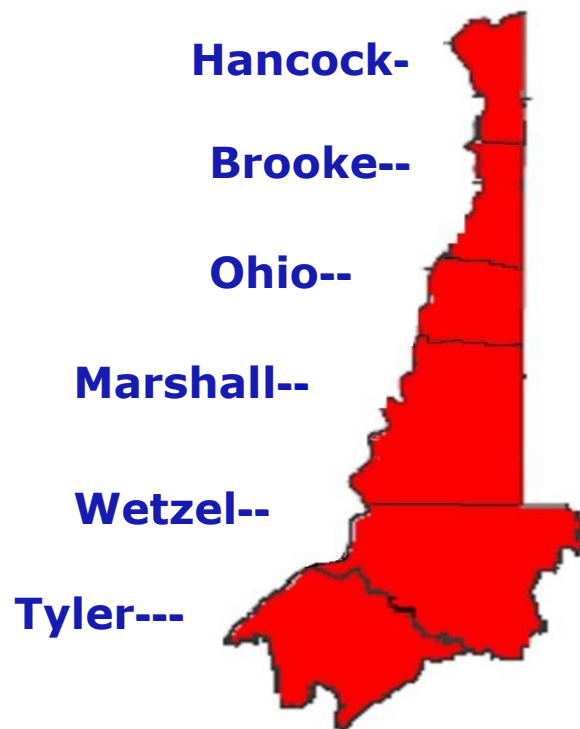


Modification, 2023

**THE NORTHERN PANHANDLE
WORKFORCE DEVELOPMENT BOARD, INC.
(NPWDB, INC.)
(REGION #5)**

LOCAL PLAN

JULY 1, 2020 – JUNE 30, 2024



AREAS COVERED IN PLAN

Hancock County
City of Weirton
Brooke County
Ohio County

City of Wheeling
Marshall County
Wetzel County
Tyler County

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SECTION 1: STRATEGIC PLANNING

A) An Analysis of the Regional Economic Conditions including Existing and Emerging High Demand Industry Sectors and Occupations; and the Employment Needs of Business in those Industry Sectors and Occupations. The Analysis should identify local Priority Industries based on Employer and WIOA Partner Input;

The last two (2) years may be one of the most tumultuous times in the US workforce due to the extraordinary influence the global pandemic had on the workplace. Factors such as the economy, job growth and unemployment significantly impacted the workforce at large and how employees behave. Thankfully, a global pandemic is rare. For most employers, 2021 was more turbulent. In the wake of the pandemic, employers experienced what became a common heading – “the great resignation.” During the initial stages of the pandemic, employees reacted to a rapidly changing environment and workforce by behaving in both predictable and unpredictable ways. Of note, was the disruption to family dynamics, such as child and elder care, health risk, education and how workers adapted to these changing conditions. Unprecedented numbers of employees exited the workforce via retirement. Most employers stepped up to comply with safety protocols and went to great lengths to protect employees.

One of the major impacts of COVID-19 was its impact on the war for talent. Worker shortages are the new norm and the new rules for talent attraction are being written daily. Labor participation rates hover at historic lows, competition for the best and brightest workers continues to ratchet up in intensity; and, workers with needed skillsets for many occupations remain in short supply. The most pressing issues facing the workforce in 2022 are labor participation, worker training and child care. Getting labor participation up to modern standards is the most critical need today. The country has not had this low of a participation rate since the mid-1970s.¹ On worker training, there is a growing need to take huge pieces of the traditional academic sector and focus them on workforce training, certification and reskilling. And to help solve the first problem, addressing the childcare workforce issue would go a long way toward getting many more women back in the workforce. Nearly 3 million women left the workforce in 2020 due to the impacts of COVID-19 on their jobs and families. The number one workforce issue is the continuing shortage of workers. The shortage has led to high wage rates, helping to fuel inflation. The two biggest items that will drive success or failure over the next couple of years will be workforce participation and skillset match. There appears to be a great emphasis on hiring people with the right soft skills and then providing them with company-specific training. Other critical workforce issues of 2022 include: Increased automation to replace human workers; Continuing shakeup of the retail workforce; Instead of people chasing jobs, jobs are chasing people. And, as jobs chase workers, employers realize they no longer must remain in big cities; and, Equity and diversity. It is an employee market now.

The Northern Panhandle’s economy continues to recover from the initial response to the COVID-19 pandemic, when shelter-in-place orders and broad shutdowns caused employers to shed jobs at a dramatic pace between mid-February and mid-April 2020. As shelter-in-place orders ended and businesses re-opened at various levels of maximum capacity (depending upon their sectors), employers managed to bring back

more than half of the jobs they had previously eliminated by mid-August. Although the Northern Panhandle region has shown some economic resiliency since March and April, its economy was on somewhat shaky ground before the pandemic started. Sectors most affected by social distancing requirements, namely retail and leisure and hospitality, have experienced the most volatility since the pandemic began. Healthcare services also saw some disruption as providers delayed non-emergent care and routine appointments to limit spread of the virus and allow hospitals to surge bed and ICU capacity.

Significant long-term challenges will likely dampen potential job growth in the region's energy sector, which is expected to add jobs at a rate of just 0.6 percent. While steam coal production is expected to rebound during the next several quarters amid higher global demand and recent increases in natural gas prices, the continued transition toward natural gas and renewables, as feature fuels to generate electricity in the US does not bode well for long-term coal demand. The region's natural gas industry will experience some weakness over the next year or so due to the retrenchment in exploration and development activity and challenging capital market conditions. Longer term prospects are more promising due to rising domestic and international demand for natural gas to generate electricity and for downstream manufacturing activity and other industrial applications. For instance, while PTT Global Chemical's proposed ethane cracker plant in Belmont County, Ohio remains in limbo, the upcoming completion of Shell's ethane cracker plant in Monaca, PA, in 2022 will boost use of regionally produced NGLs and create additional market uses for natural gas. Moreover, this would yield potential growth opportunities for the region's manufacturing sector, which has struggled to sustain any meaningful growth for much of the last few decades. Of course, the natural gas industry does face its own set of downside risks. These risks largely stem from legal challenges to midstream assets such as interstate natural gas pipelines and storage as well as downstream projects such as natural gas power plants and petrochemicals manufacturing plants. The regulatory environment poses a risk to the forecast, as the Biden Administration has signaled some willingness to subject fossil fuel projects to tougher standards based on their emissions and impact on the climate. Natural resources and mining had been the area's key source of job growth between early-2016 and late-2018 thanks to rapid increases in output from the Utica Shale, but production and exploration activity has slowed significantly over the past few years. Although Ohio County has experienced the largest swing in jobs during the COVID-19 pandemic, Marshall County has accounted for most of the regional economic volatility since 2016. Given the massive level of natural gas pipeline infrastructure development occurring within Marshall County, payrolls in the county surged by more than one third (3,300 jobs) between late-2016 and mid-2018. The completion and/or delay of them eventually resulted in a nearly an equal number of jobs being lost during 2019. Energy sector payrolls struggled further prior to and during the pandemic as steam coal output cratered due to the combined effects of a general downward decline in coal-fired electricity generation and the global economic shock caused by the COVID-19 pandemic.

Coal and natural gas payrolls have begun to inch higher in recent months thanks to rebounding output, but their high levels of productivity and the ongoing labor shortages related to the pandemic have kept job gains very modest so far. Overall, while Marshall County experienced the smallest percentage decline in payrolls as the COVID-

19 pandemic began, only 25% of those jobs lost have been recovered over the past five (5) quarters. Wetzel County is the region's most rural economy but has also experienced the strongest rebound in economic activity from the beginning of the pandemic. Payrolls have bounced back to their pre-pandemic levels due in large part to continued growth in the natural gas industry. Wetzel County is among the State's top natural gas producing counties and has seen withdrawal volumes rise steeply in the past three (3) years or so, leading to a near doubling of gas industry payrolls over that period. Completion of the Mountaineer Xpress Pipeline and Sherwood Lateral for the Rover II project have weighed on the construction sector and services industries connected to the projects and construction work on other projects in the area have boosted payrolls over the past year.

The Wheeling Area is unique in comparison to other economic regions in West Virginia as the region possesses both major coal mining operations and abundant natural gas and natural gas liquid (NGL) reserves. Marshall, Ohio and Wetzel Counties rank 1st, 3rd, and 5th in the State in terms of coal production among the two dozen or so coal-producing counties West Virginia. During 2019, Marshall County's production eclipsed a new record high of 18.3 million short tons, though output fell to 13.9 million short tons during 2020, the lowest annual total since 2010. With the rebound in broader economic activity and increases in natural gas prices, domestic steam coal demand has improved. Coal output from Marshall County mines has increased more than forty percent (40%) during the first half of 2021 compared to the same six-month period in 2020, though production does remain down ten percent (10%) versus the first and second quarter total in 2019. Ohio County's coal production also achieved all-time highs in 2019, but registered a much smaller decline in output during 2020 as tonnage fell from 7.3 million to 6.8 million short tons. Several of the power plants in other States supplied by Tunnel Ridge Mine were at risk of closure in recent years, but appear to likely remain in operation for the foreseeable future. During the first half of 2021, tonnage is roughly on par with that of the last two (2) years. The Wheeling Area's economy has developed into a major player in natural gas production thanks to its location in the heart of the Utica and Marcellus Shale plays. Marshall, Wetzel and Ohio Counties ranked 2nd, 5th and 8th in terms of statewide natural gas production in 2020 and their recorded withdrawal volumes accounted for nearly one-third of the State's output.

Though occupying a smaller footprint in the Wheeling Area's economy compared to say 25 years ago, the manufacturing sector certainly remains a significant presence in the area thanks to a sizable concentration of chemicals, plastics and metals manufacturing businesses. The shale gas boom throughout the region has energized portions of the manufacturing base, most notably the chemicals and plastics producers, which rely heavily on natural gas and by-products from shale deposits as feedstock. In addition, new companies have emerged in the region (e.g., Pietro Fiorentini) that manufacture pipe fittings, controls and other components that are used to drill or transport natural gas.

The Wheeling area has experienced major episodes of economic volatility in recent years. The region has swung between periods where natural gas pipeline construction activity added thousands of jobs locally during 2017 and most of 2018, only to be followed by unprecedented job losses in just two (2) months due to the COVID-19 recession, projects that wound down and other major pipeline projects that were

delayed or even canceled. Additionally, a major hospital, Ohio Valley Medical Center, closed which accelerated job losses (700 health care sectors jobs were lost).

Several key factors are behind the Wheeling area's recent economic performance: 1) Above-average rates of job losses during the COVID-19 pandemic as regional employment fell by more than sixteen percent (16%), a loss of nearly 10,000 jobs between mid-February and mid-April 2020; 2) Payrolls have increased at a strong pace over the past year, but only sixty percent (60%) of jobs lost during the initial phase of the pandemic have been recovered. Ohio County experienced the largest losses of any county in the region while Wetzel County is the lone county to see payrolls return to pre-pandemic levels; 3) Coal production in the region plunged to its lowest levels in a decade during the pandemic, but productive operations and rebounding demand have allowed output to return close to pre-pandemic levels; 4) Natural gas output from horizontal wells has increased nearly ten percent (10%) combined in Marshall, Ohio and Wetzel counties over the past year; 5) Measured unemployment in the region has been volatile in recent years. The jobless rate reached a pandemic high of nearly sixteen (16%) but has fallen to just below six percent (6%) in late-2021; 6) The area's work force has declined steadily over the years, but the pandemic has added another strain to the labor market as nearly 3,000 people have left the workforce since early-2020; 7) Per capita income has grown well above State and national averages in recent years. Ohio County residents have the highest income levels in the State; and, 8) The region will see continued volatility over the next year or so due to pandemic-related factors. Growth will lag the State average over the remainder of the outlook period. The Wheeling area has seen its economy bounce back to some extent over the past eighteen (18) months or so as most public health measures have been lifted and vaccines as well as other treatments for COVID-19 have become more widely available, but the region continues to lag broader statewide and national-level growth as several key sectors remain encumbered by continued public health concerns, supply chain constraints and labor shortages. Overall, the region has recovered only half of the jobs lost during the initial phase of the pandemic.

Although energy production and manufacturing activity play a major role in the area's economy, the trade, transportation and utilities super-sector ranks as the largest source of private sector employment.

Prior to 2019, the super-sector was relatively stable in terms of payroll levels, though the performance was uneven across its underlying sectors. For example, retail trade was the weakest segment in the area by a wide margin. Traditional brick-and mortar retail activity across the US has seen its struggles deepen in recent years as consumer spending activity continued to shift spending to online direct-ship or online order-and-pickup platforms. As a result, several retailers have closed in the region due to weak sales or as part of broader bankruptcy liquidations by their national corporate offices. Of course, the pandemic led to an abrupt loss in retail and transportation jobs locally due to the imposition of temporary business closures and capacity restrictions during the initial public health response. Payrolls have recovered to some extent over the past year or so as healthy consumer balance sheets and strong levels of pent-up demand have boosted spending on goods much more so than services, both in-person and online. At the same time, payroll growth remains encumbered by the pandemic as retailers and other service sector businesses cope with labor shortages caused by

workers facing quarantines due to virus exposures as well as a higher than-normal level of unfilled job openings. Education and health services contain nearly one-in-five of the region's jobs. While the sector's trends have been positive at the State and national level over the past decade, conditions locally have been less sanguine. The sector has experienced problems in recent years as several hospitals in the region have posted poor fiscal results amid rising costs and declining populations in the service area. Reynolds Memorial Hospital was purchased by WVU Medicine in 2016 while Wheeling Hospital and Wetzel County Hospital all entered into management agreements with WVU Medicine within the past few years to make their respective facilities stronger. The closure of the Ohio Valley Medical Center was offset to some extent by WVU Medicine absorbing patients and taking on some of the staff. The COVID-19 pandemic has also represented a significant blow to the sector's well-being over the past year or so. Indeed, the surge in hospitalizations in Winter 2020/2021 as well as the much larger surge in cases and hospitalizations during late-Summer 2021 due to the Delta variant have led to considerable strains on hospital staff and resources, forcing many providers to cancel routine appointments and in-patient procedures as more capacity had to be shifted to intensive care or larger covid wards to prevent viral spread within hospitals.

The Northern Panhandle could benefit from the largest economic development project in the State's history. Nucor Corporation has chosen Mason County for a new state-of-the-art sheet steel mill facility. Local legislators expect this plan could provide a much-welcomed economic boost in the Northern Panhandle. Nucor Corporation is the country's largest steel manufacturer, based out of Charlotte, N.C., but it could soon have ties to Brooke or Hancock County.

"Nucor Steel has stated it will be investing just under \$3 billion in our State for a new electric arc furnace steel plant," Delegate Pat McGeehan said. ".....They also announced they are considering building a separate facility in the northern part of the State, a transloading processing center that would help them serve their customers in the upper Midwest and Northeast regions," State Senator Ryan Weld said. "They have not announced a location for that but have indicated that it will be in the northern part of the State." According to West Virginia Governor Jim Justice's press release, the initial facility will bring around 800 jobs. Then, once it expands and other sites become developed, an additional 1,000 jobs are expected. State Senator Weld said if a site in the Northern Panhandle is selected it could bring a big economic boost to the area. "I think that the Northern Panhandle is in a prime location to serve that location because of our rail access, our river access, obviously, and the fact that we are close to major routes - I-70, I-79, U.S.22," Weld said. Nucor is a publicly-traded company that has a track record of performance, as well as delivering on promises they've made - expansion and location," State Senator Weld said. Information regarding a timetable of when Nucor could release its secondary site has not been announced. Additionally, legislators in Charleston remain unsure of how many jobs this could bring specifically to the Northern Panhandle.

TOP 10 EMPLOYERS BY COUNTY, MARCH 2021

<p><u>Hancock County</u> Arcelormittal, Inc. Board of Education Mountaineer Park, Inc. Homer Laughlin China Co. Bellofram Corp. Weirton Geriatric Center, Inc. Ergon - WV City of Weirton Change, Inc. Hancock County Commission</p>	<p><u>Brooke County</u> Weirton Medical Center Board of Education Wal Mart Mountain State Carbon, LLC* WMC Physicians Practices, LLC Justrite Manufacturing Co, LLC Kroger Co. Wheeling-Nippon Steel, Inc. Bethany College New RSC, LLC</p>
<p><u>Ohio County</u> WVU Medicine Board of Education Cabela's Wholesale, LLC Williams Lea, Inc. Wesbanco Bank, Inc. American Consol Natural Resources Tunnel Ridge, LLC City of Wheeling Health Plan of the Upper Ohio Valley West Liberty University</p>	<p><u>Marshall County</u> Board of Education American Cons. Natural Resources WVU Medicine Wal Mart Williams WPC-1, Inc. Consol PA Coal Co, LLC Covestro, LLC Warren Distributing, Inc. Department of Highways Westlake Mining Services, Inc.</p>
<p><u>Wetzel County</u> Board of Education Wal Mart American Cons. Natural Resources WVU Medicine Sunbridge Mountain Care Management Wetzel County Commission City of New Martinsville McDonald's Litman Excavating Eastern Gas Transmission & Storage</p>	<p><u>Tyler County</u> Momentive Perf. Materials USA, Inc. Board of Education Minton Management, Inc. Tyler County Commission Quality Carriers, Inc. Real Alloy Recycling, LLC Sistersville Center Department of Highways Council of Senior Tyler Countains Sistersville Tank Works, Inc.</p>

*Closed in May, 2022.

*Workforce West Virginia Research, Information and Analysis, LMI and Trends, 2022.

**INDUSTRY EMPLOYMENT PROJECTIONS, 2018-2028
NORTHERN PANHANDLE REGION**

<u>INDUSTRY</u>	<u>ESTIMATED 2018 EMPLOYMENT</u>	<u>PROJECTED 2028 EMPLOYMENT</u>	<u>NUMERIC CHANGE</u>	<u>ANNUAL GROWTH RATE</u>
GROWING INDUSTRIES				
Hospitals	4,974	5,576	602	1.1
Food Services & Drinking Places	5,117	5,713	596	1.1
Ambulatory Health Care Services	3,251	3,744	493	1.4
Administrative & Support Services	2,073	2,385	312	1.4
Social Assistance	1,347	1,573	226	1.6
DECLINING INDUSTRIES				
Merchant Wholesalers Durable Goods	1,317	1,194	-123	-1.0
Fabric & Metal Product Manufacturing	1,276	1,174	-102	-0.8
Mining (except Oil and Gas)	2,165	2,076	-89	-0.4
Health & Personal Care Stores	452	404	-48	-1.1
Electronics & Appliance Stores	380	335	-45	-1.3

***Workforce West Virginia Research, Information and Analysis, LMI and Trends, 2022.**

**OCCUPATIONAL PROJECTIONS, 2018-2028
TOP 15 OCCUPATIONS BY GROWTH RATE
NORTHERN PANHANDLE REGION**

Personal Care Aides
 Taxi Drivers & Chauffeurs
 Cooks, Restaurant
 Rehabilitation Counselors
 Medical Assistants
 Combined Food Preparation & Serving Workers, Including Fast Food
 Registered Nurses
 Weighers, Measurers, Checkers & Samplers, Recordkeeping
 Residential Advisors
 Billing and Posting Clerks
 Janitors & Cleaners, Except Maids and Housekeeping Cleaners
 Food Service Managers
 Hosts & Hostesses, Restaurant, Lounge & Coffee Shop
 Nursing Assistant
 Chemical Equipment Operators & Tenders

***Workforce West Virginia Research, Information and Analysis, LMI and Trends, 2022.**

- *" Employee Retention Insights from Work Institute," Workforce 2022 Magazine, pages 20-21.
- *" The Top 10 Workforce Issues of 2022," Workforce 2022 Magazine, pages 10-14.
- * Wheeling Area Economic Outlook 2022-2026, Bureau of Business & Economic Research WVU.
- * WVU Economic Outlook, 2021-2025.
- * WTOV-9 News, January 12, 2022.

B) An Analysis of the Knowledge and Skills required to meet the Employment Needs of Businesses in the Local Area, including Employment Needs for High Demand Industry Sectors and Occupations;

As America continues to emerge from the pandemic's grip, several economists anticipate a wave of job creation in the second half of the year, a level of growth we haven't seen in thirty (30) years. Our national labor market has reached a critical juncture. Are we ready? Survey suggests that we aren't ready and it's time to change how we train and upskill our workforce. A recent Kelly Survey reveals employers and workers views on upskilling. Eight (8) in ten (10) managers say workers need more education, credentials or training. And seventy-three percent (73%) of workers say they would prefer upskilling opportunities if their employers offered it to them. But nearly half of workers, forty-seven percent (47%), say they don't understand which skills matter most to employers.

To remake our post-pandemic workforce and to ride the wave of high-demand skilled jobs, more employers must clearly define the knowledge, skills and abilities they require. They must look at workers through a "skills lens" and provide pathways to help them obtain requisite learning. This "learn while you earn" approach will play an increasingly vital role in preparing people for work. This approach will benefit workers. To help workers develop the skills they need, federal and State policymakers and education providers must adopt a more transparent, accessible and open-minded approach to awarding and valuing industry certification and other credentials. This is needed because one (1) in four (4) workers say they don't know where to acquire new skills and more than half are worried about how to pay for it. We must expand the availability of employment and upskilling opportunities.

According to "Balance Careers," January, 2020, there are certain skills and qualities employers seek in all their employees, regardless of the position. These are called soft skills and they are the personal attributes, personality traits, inherent social cues and communication abilities needed for success on the job. Soft skills are also commonly referred to as professional skills. Examples of soft skills include: Adaptability; Communication; Creative Thinking; Teamwork; Work Ethics; Networking; Decision-Making; Time Management; Motivation/Initiative; Flexibility; Problem-Solving and Critical Thinking; Digital Literacy; Emotional Intelligence; and, Conflict Resolution.

Every job required employees to engage with others in some way. Being able to interact well with others is very important in any job. One of the reasons employers look for applicants with soft skills is because soft skills are transferable and can be used regardless of the job at which the person is working. This makes job candidates with soft skills very adaptable employees with unique and broad backgrounds that can diversify a company and help it run more efficiently. Soft skills are particularly important in customer-based jobs.

Hard skills are more tangible or technical skills that most jobs required. They are the specific knowledge and abilities required to do the job. It's important to show employers you have both, soft and hard skills or a combination of hybrid skills, they need when you're applying and interviewing for jobs. Hard skills are acquired through formal education and training programs, including college, apprenticeships, short-term

training classes, online courses and on-the-job training. Examples of hard skills include: Computer Programming; Web Design; Typing; Accounting/Finance; Automotive; Bookkeeping; Construction; Information Technology; Carpentry; Pipefitter; Nursing; Mechanical; Teaching; and, Word Processing. Most “key” technical skills that cut across all “high demand” occupations are related to technology, including use and maintenance of equipment and effective communications through technology. Recognized credentials and/or proof of experience are often required to demonstrate occupation-specific technical skills. Science, Technology, Engineering and Mathematics (STEM) knowledge and competencies are among the most critical for most “high demand” occupations.

With a number of older workers preparing to retire in manufacturing and construction in the region, it is anticipated there will be a shortage of skill-ready workers to replace them. As an example, the oil and gas boom the region has been experiencing the past few years attracted a large number of heavy equipment and tractor trailer truck drivers and construction workers. Short-term training is required, especially those of a high-tech nature, because advanced automation will intensify the need for more technical skills. To become job-ready for these positions, today’s workers need to possess a combination of math, computer, mechanical engineering and troubleshooting skills. Apprenticeship Training (some of which are applied to college credits), On-The-Job (OJT) training, Certification/Degree training, and vocational/career technical training programs are aimed at developing these skills in job seekers in an effort to create a pipeline for employment in manufacturing, construction, including the trades, etc. Employment in office and administration and retail industries also require OJT or short-term training. For the healthcare industry, with the exception of support positions, some post-secondary skills or industry-recognized credentials are required. Likewise, along with technical skills, post-secondary degrees are needed for information technology, engineering, management and professional occupations. Additional conditions for hiring in various industry sectors, including healthcare, financial and education and transportation, will most likely require criminal background checks, drug testing, physicals, etc.

C) An Analysis of the Workforce in the Local Area, including Labor Force Employment and Unemployment Data, and Information on Labor Market Trends, and the Educational and Skill Levels of the Workforce in the Local Area, including Individuals with Barriers to Employment;

Each county in the region has lost residents. According to population estimates, between July 1, 2020 and the same date in 2021, Ohio County lost 488 people, going from 42,264 to 41,776 people. Marshall County went from 30,444 to 30,115, losing 329 people. Brooke and Hancock counties saw a decrease of 324 and 363 people, respectively, while Wetzel and Tyler counties saw population drops of 212 and 124, respectively.

Just as with the rest of the State, the area’s population has been negatively affected by deaths consistently outnumbering births. Part of this is due to the area’s larger-than-normal share of elderly residents where causes of death range from a host of health issues, like heart disease and drug overdoses help explain the region’s high mortality rate. COVID-19 has also impacted the region’s health outcomes and mortality

over the past year or so, as more than 18,000 residents have been confirmed to be infected and more than 450 have died over the course of the pandemic.

Historical demographic trends for the Wheeling Area are expected to persist into the outlook period as the forecast calls for the region's population to shrink at a rate of more than 0.3 percent annually over the next five years, or a decline of nearly 600 residents per year.

The economic forecast for the Northern Panhandle region is as follows: 1) Employment will increase at an average annual rate of 0.8 percent over the next five (5) years. Job growth in the region is expected to be at its strongest during the first half of the outlook period, driven in large part by pandemic recovery; 2) Growth could exceed expectations if growth in downstream natural gas industries is realized, such as PTT Global proposed ethane cracker facility; 3) Service sectors will lead the region in terms of job growth going forward, as consumer-driven sectors such as leisure and hospitality benefit from the waning impacts of the COVID-19 pandemic; 4) Goods-producing sectors will grow slower than the regional average, though the energy sector is likely subject to considerable upside and downside risk during the outlook period; 5) Unemployment is expected to moderate further over the next couple of years before stabilizing in the low to mid-5-percent range; 6) Inflation-adjusted per capita income is expected to rise at an annual average rate of 1.8 percent between 2022 and 2026; 7) Population has declined by more than 18,000 residents over the past two decades. Poor health outcomes and a growing share of elderly residents have contributed to an increasing natural population decline; 8) Population losses are expected to continue in the area during the outlook period, but declines will be smaller compared to the past few years; and, 9) All counties are expected to lose residents, but Wetzel County will likely endure the largest percentage declines (0.8 percent) going forward.

Marshall County Commission President John Gruzinskis said that the county's development of tax increment financing districts along the Ohio River is aimed at attracting business and industry into Marshall County, hopefully providing a long-term fix to population loss in addition to its more immediately obvious benefits. "We've established two TIF districts along the river, and that's to attract more industry to the area," Gruzinskis said. "We realize there's always going to be an ebb and flow, because it's a statewide trend, that the entire State is losing the youngest of our population. The industry we're starting to see, as it relates to (oil and) gas, ... the technology requires younger individuals," Gruzinskis continued. "That's something we're just going to have to deal with, but we're trying to make our area as attractive as possible to industry, because industry will draw employees, and hopefully they'll be from out of our high schools." Ohio County Commission President Randy Wharton agreed, saying that the commission has worked to entice local businesses to expand. The commissioners have highly incentivized businesses to remain in the area as much as possible, and we will continue to do that, especially when it relates to manufacturing and light industry. "You get a double whammy on that – you get a boost of jobs to build them, and then you get permanent jobs, which in most cases are the higher-paying jobs," he added. "We have always done that, and we will continue to do that." Wharton pointed out that many counties struggle with enticing the younger population to stay local, especially in an age where remote employment is becoming more highly sought after by younger professionals. "It's a shame with some of these

larger companies, especially software, technical offices, large corporations don't realize how inexpensive it would be to have their employees working remotely from here," he said. "... We have reliable utilities. We're not suffering rolling blackouts, forest fires or things like that. We don't have a high crime rate. It boils down to, where do the people leaving want to live? That's a tough problem to deal with."

In West Virginia, few of the 55 counties saw significant population growth. The biggest population jump was in Berkeley County, which saw an increase of 3,415 people, and was the only county to see an increase of more than a thousand people. Monongalia County reported an increase of 471 people, with other counties which grew reporting fewer than 500 additional people. Statewide, 6,839 fewer people resided within the Mountain State in 2021 compared to the previous year.

COUNTY POPULATION NORTHERN PANHANDLE REGION			
	POPULATION	AGE 65 +	VETERANS
HANCOCK	28,656	23.7%	2,560
BROOKE	22,140	24.6%	1,555
OHIO	41,776	22.2%	2,897
MARSHALL	30,115	23.0%	2,029
WETZEL	14,179	23.2%	828
TYLER	8,155	23.4%	692

***US Census Bureau, Quick Facts, July 1, 2021.**

Overall, the region's workforce declined by roughly 5,000 people between 2010 and late-2019. The COVID-19 pandemic has exacerbated the drop-off in the region's workforce, as numerous workers retired early, and others remain out of the workforce due to concerns over contracting the virus at the workplace. Overall, the region's labor force has shrunk by more than 3,000 since the beginning of 2020.

Workforce participation rates in the Wheeling Area tend to be at least on par with the West Virginia statewide. Marshall County lags the statewide average by several percentage points overall, but like Ohio County, workforce participation among the prime working age (25 to 54 years) falls roughly in line with the national average. By comparison, Wetzel County's workforce participation rate (46.6 percent) lags both State and national averages by a sizable margin and the county's participation rate deficit persists across all age cohorts.

Over the past decade, per capita income growth in the region has surpassed both State and national averages due to strong wage growth, particularly within coal, natural gas and more recently pipeline construction, rising royalty income paid to mineral rights owners and large increases in small business income. Transfer payments account for an above-average share of personal income in the area, though this is attributable to the region's high share of elderly residents. Ohio County residents received income levels of \$70,000 per person during 2020, ranking it as the highest among West Virginia's 55 counties and the only county in the State with average

income levels exceeding the national average. Marshall and Wetzel counties fall short of the statewide average, with residents receiving an average of between \$42,000 and \$41,000 respectively in 2020.

The energy industry will play an outsized role in the area's performance during the outlook period in a direct manner, but its influence will extend into other segments of the region's economy as well. A significant portion of the region's professional and business services sector has an interdependent relationship with the area's coal and natural gas industries vis-à-vis providing contract labor workers, as well as engineering, legal and other support services. During the forecast horizon, we anticipate the energy industry's growth, along with broader US economic gains that will buoy demand for business services firms, will cause payrolls to increase nearly three percent (3%) per year.

Construction payrolls in the area are expected to grow 0.8 percent annually during the outlook period, though growth will be concentrated over the next couple of years. Natural gas pipeline infrastructure located within the region's footprint has mostly been completed, but additional investment is possible contingent upon the legal/regulatory environment and market conditions for natural gas and NGLs. Other portions of the construction sector is expected to see a solid performance over the next five (5) years. Public infrastructure investment is expected to be at a relatively high level as the region has projects ongoing under the Roads to Prosperity program (I-70 Bridges project) and the State's recent announcement to spend \$1 billion on broadband development bodes well for high-skill construction activity. Moreover, federal infrastructure spending will likely contribute to baseline construction activity across the country in a significant manner as the Infrastructure Investment and Jobs Act and Build Back Better Act (2022 budget reconciliation) add hundreds of billions to physical infrastructure outlays for the next decade. In addition, strong income growth will likely bolster demand for new or remodeled housing in the area as a large share of the regional housing stock was built more than 50 years ago. Further development of the Tri-State Area's natural gas industry should benefit the four-county region as well, as extraction companies set up their core and auxiliary offices in Ohio and Marshall counties, along with legal, accounting, engineering and other business services firms. This should also help with revitalization efforts in the City of Wheeling as new industrial and office construction can remove some of the area's deteriorating properties.

The forecast calls for manufacturing payrolls to increase just over 0.3 percent annually during the outlook period. The region's chemicals industry has endured what has mostly been a decades-long downward trend in both production and employment caused by the closure and downsizing of many plants over the years. Going forward, it is anticipated that there will be some stabilization for these manufacturers, a direct result of an abundant supply of low-cost feedstock in the Marcellus and Utica Shale plays. Moreover, opportunities will increase as the Monaca, PA, Shell ethane cracker scales up operation over the forecast horizon since the facility will produce polyethylene pellets that can be used by local plastics and chemicals manufacturers and not imported from the Gulf Coast.

Education and health services are expected to add jobs at a 1.0 percent average annual rate through 2026. Initial gains for the sector will be driven by the expected

waning of the COVID-19 pandemic, which should allow healthcare facilities to return to more normal staffing and scheduled care provision. Longer term, demographic factors suggest healthcare demand will likely increase going forward as the area's population ages further, but decades of declining population suggest limited upside for significant additions to hospital capacity—particularly given the recent closures of two (2) area hospitals. At the same time, the emergence of WVU Medicine as a strategic partner for several facilities provide at least a stabilizing presence for the sector and could foster growth in certain types of specialty medicines not previously available to residents. Public sector payrolls in the Wheeling Area are expected to increase by one percent (1%) per year. Most of the growth will occur at the local government level as State and local governments recover to more normal staffing levels after the pandemic prompted a spike in early retirements and job exits across many agencies. Federal aid to State and local governments is expected to add a backstop to certain activities, such as education, while increased federal spending on infrastructure and other programs will enable to direct locally-generated revenue streams to targeted areas of opportunity.

Large revisions to historical data in the next benchmark revision as well as any unanticipated changes in the Wheeling Area's labor force participation rate could cause the forecast for the regional unemployment rate to differ significantly from both its projected level and path. In addition, the path of the pandemic over the next year or so will have a significant influence on the trajectory of the unemployment rate. With that said, the forecast calls for the regional unemployment rate to average just below 6% in 2021 before falling to the region's more natural rate of unemployment in the low 5% range. Ohio County is expected to have the lowest unemployment rate in the region with Wetzel County continuing to have the highest rate going forward.



UNEMPLOYMENT RATES BY COUNTY, FEBRUARY, 2022
NORTHERN PANHANDLE REGION

COUNTY	UNEMPLOYMENT RATE	CIVILIAN LABOR FORCE RATE	TOTAL EMPLOYMENT	TOTAL UNEMPLOYMENT
HANCOCK	5.5%	13,040	12,320	720
BROOKE	5.4%	9,910	9,380	540
OHIO	4.5%	20,320	19,410	920
MARSHALL	6.6%	13,500	12,610	890
WETZEL	7.0%	7,040	6,550	490
TYLER	8.0%	3,060	2,820	250

*Workforce West Virginia Research, Information and Analysis, LMI and Trends, County Data Release, March, 2022.

ECONOMY
NORTHERN PANHANDLE REGION

IN CIVILIAN LABOR FORCE
AGES 16 +, 2016-2020

HANCOCK	57.4%
BROOKE	54.3%
OHIO	57.6%
MARSHALL	51.2%
WETZEL	46.5%
TYLER	45.5%

*US Census Bureau, Quick Facts, July 1, 2021.

INCOME & POVERTY
NORTHERN PANHANDLE REGION

	POVERTY RATE	MEDIAN HOUSEHOLD INCOME	PER CAPITA INCOME PAST 12 MONTHS
HANCOCK	12%	48,140	27,261
BROOKE	11.9%	48,168	26,694
OHIO	18.1%	48,056	31,208
MARSHALL	13.7%	48,179	27,328
WETZEL	15.9%	44,539	23,050
TYLER	14.4%	47,498	27,150

*US Census Bureau, Quick Facts, July 1, 2021.

The period between 2022 and 2026 will likely see real income growth proceed at an average annual rate of 1.5 percent. Job gains in high-wage industries such as public infrastructure construction activity, natural gas and manufacturing as well as continued growth in royalty payments from gas production will support income gains. Transfer payments will be a major buoy to incomes in the area as a growing share of residents become eligible for Social Security and Medicare programs; however, these safety net programs will account for a smaller share of total income going forward when compared to 2020 and 2021 as federal pandemic relief programs have ended and will not continue.

WVU's economists say the State's opioid crisis, in addition to the direct problems associated with it, is costing thousands of jobs and diverting resources that could be used elsewhere. John Deskins, Director of WVU's Bureau of Business and Economic Research, said "WV's labor force participation rate stands dead last among the 50 states and Washington, DC." Mr. Deskins said, "A big contributing factor to the State's low rate in the prevalence of opioids and the inability of many workers to pass a drug test. It's a huge black mark on our State in terms of drawing in potential businesses. This is dramatic and this is a major, major impediment to job growth." He noted that the status quo is a vicious cycle: jobs dry up, so people turn to drugs out of despair and as a result can't pass a drug test when new employers consider setting up shop.

"High demand" occupations and employee hiring trends can be found in many different sectors of the labor market and require various levels of education and preparation. This is due to rising employment opportunities in occupations that require more preparation, including education, experience and job training. Technology will be playing a crucial role in hiring, besides recruitment marketing and candidate relationship management that will gain importance. The NPWDB, Inc. and Core Partners will continue to concentrate its efforts on developing Career Pathways with industry-recognized credentials in "high demand" occupations. In particular, Youth and young Adults will be connected to work opportunities in defined Career Pathways in "high demand" occupations so they can develop the necessary knowledge and skills needed to ensure their self-sufficiency and prosperity in the future.

According to the U.S. Bureau of Labor Statistics, 2014-2018, an estimated 89.8% of working individuals 25 years and older in the region earned a High School Diploma as their highest educational achievement, while an estimated total of 19.9% earned a Bachelor's Degree or higher. In comparison, West Virginia had 86.5% of working individuals 25 years and older earn a High School Diploma and 20.3% earn a Bachelor's Degree during the same time frame. And nationally, 87.7% of working individuals 25 and older earned a High School Diploma as their highest educational achievement, while a total of 31.5% earned a Bachelor's Degree or better. We need to continue investing in our people to give them the sort of skills that bode well in the tech-driven economy of the future.

The area lags both State and national averages in measures of attaining four-year degrees or higher, with less than 21 percent of residents aged 25 years and older possess at least a bachelor's degree. At the same time, the region does perform well in terms of two year degrees and other types of vocational training as 10 percent of the 25 years and older population have received an associate degree.

**EDUCATION LEVELS
NORTHERN PANHANDLE REGION**

**HIGH SCHOOL GRADUATE
OR HIGHER, AGES 25 +,
2016-2020**

**BACHELOR'S DEGREE OR HIGHER,
AGES 25 +, 2016-2020**

HANCOCK	89.3%	16.3%
BROOKE	91.9%	20.2%
OHIO	92.8%	31.6%
MARSHALL	92.4%	18.6%
WETZEL	86.6%	12.6%
TYLER	89.4%	16.2%

***US Census Bureau, Quick Facts, July 1, 2021.**

Workers with higher levels of education tend to earn more than those with less education, but that is not always the case. More education doesn't always get you more money. Factors influencing lifetime earnings include: age, field of study, occupation, gender, race, ethnicity and location, which was based on ten (10) years of working age earning data through 2019 from the US Census Bureau American Community Survey. Among other findings the Report determined that sixteen percent (16%) of High School Graduates, twenty-three percent (23%) of workers with some college education and twenty-eight percent (28%) of Associate's Degree holders earn more than half of workers with a Bachelor's Degree. To be sure, having more education typically pays off, says the Report. An Associate's Degree typically results in a twenty-five percent (25%) boost and a Bachelor's Degree a seventy-five percent (75%) boost in lifetime earnings over a High School Diploma. A Bachelor's Degree holder earns at median, \$2.8 million over a lifetime, which translates into average annual earnings of about \$70,000. Master's Degree holders earn a median of \$3.2 million over their lifetimes, while Doctoral Degree holders earn \$4 million and Professional Degree holders earn \$4.7 million. However, one quarter of workers with a Bachelor's Degree earn more than half of workers with a Masters or a Doctoral Degree says the Report. The gaps in earning by education level tend to widen with age as earnings of workers with more education increases more dramatically. Post-secondary education has become more valuable in the workforce. Pathways beyond just going to college are abundant and complex. Counselors are in short supply in most public schools and colleges. There is often separate academic and career counseling offered, which means that student's academic programs may not be aligned with their career plans or with employment opportunities. Students need to be interacting with career counselors by middle school and continue interacting with them as they maneuver through the secondary and post-secondary education systems towards their careers. A comprehensive career counseling system would greatly benefit students by giving them the information and support they need to make informed decision about their education and occupation that ultimately influence their lifelong earnings and well-being.

- * "Is America's Workforce Ready for a Tsunami of Skilled Jobs?" Workforce 2022 Magazine, Pages 52-53.
- * Wheeling Area Economic Outlook 2022-2026, Bureau of Business & Economic Research WVU.
- * The Intelligencer/Wheeling News Register "Ohio Valley looks to Stem Tide of Population Loss." March 29, 2022.
- * Wheeling Area Economic Outlook 2022-2026, Bureau of Business & Economic Research WVU.
- * State Journal, November 27, 2017.
- * "Education Level is Only One Part of the Lifetime Earnings Picture," Workforce 2022 Magazine, Pages 54 - 55.

D) An Analysis of Workforce Development Activities, including Education and Training, in the Local Area, including an Analysis of the Strengths and Weaknesses of such Services, and the Capacity to provide such Services, in order to address the identified Education and Skill Needs of the Workforce and the Employment Needs of Employers in the Local Area;

The implementation of the Workforce Innovation & Opportunity Act (WIOA) provides us with an opportunity to establish new policies, procedures and strategies that better meet the needs of job seekers, including those with disabilities, and employers. The local workforce development system is universally accessible, customer-centered and training is job-driven. The most promising strategies for serving job seekers with barriers to employment involve a concurrent mix of employment, training and support services. WIOA makes clear that low income people and those with barriers to employment are priority populations for funding and services. So, training services and strategies in the region will specifically target this population. An effective set of comprehensive services will be implemented to address WIOA eligibility issues that often deter Adults and Youth with barriers to economic success from accessing services they need to get ahead in life. Improved economic opportunity depends on an individual's ability to access education and training that prepares them for college and career success. Strategies will require collaboration involving workforce development agencies, education and training institutions and employment services agencies. Adults and Dislocated Workers will be able to access a number of career and training services. Youth will be provided with access to fourteen (14) required program elements of services. Employers will be able to access a talented pool of qualified potential employees and the most current labor market data. Training will be supported through an Eligible Training Provider List (ETPL) comprised of Training Providers with proven track records of securing family-sustaining employment for participants once training has ended. There will be accessible and flexible Work-Based Training options available, like: On-The-Job (OJT); Customized Training; and, Incumbent Worker Training. The local workforce development system will be an important Partner to the region's community college, four (4) year colleges, Career and Technical Centers and employers in helping underprepared Adults and Youth obtain skills that lead to family-sustaining careers. Collaborating with Core and Required Partners will allow us to improve the efficiency of the local workforce development system and avoid duplication of services in the region. In an effort to expand services to eligible individuals with barriers to employment, the NPWDB, Inc. and its Core and Required Partners will develop, expand and fund a number of high quality Training Programs and Services for them. We will work closely with area employers on developing long-term career opportunities. We will provide necessary Supportive Services that will help individuals during their training and/or career.

Career Pathway Services are a collective look at education, training, wage and outlook information for "high demand" occupations and will be provided in concert with Core and Required Partners. Career Pathways will help job seekers gain the skills necessary to start, jumpstart, advance within multiple occupations or advance within a single occupation or move to a new occupation that has similar skills to the previous occupation. These services offered will encompass a combination of rigorous and high

quality education, training and other services that align with the skill needs of industries of the State and regional economy. They will provide a road map for individuals that show the certificate or degree requirements and employment outlook that will lead that individual to their desired education and employment goals. The delivery of Career Pathways will include: Intake; Assessment; Advising; Instruction; and, Individual learning plans. Job seekers can be assured that, wherever or whenever, they enter the local workforce development system there will be a clear pathway that ensures referral(s) are made to appropriate program and services, and ultimately, successful outcomes are achieved. Any point of entry will provide a job seeker access to the full continuum of Programs and Services. Partnerships will be implemented between the local workforce development system, post-secondary institutions and Supportive Services. Besides the delivery of Career Pathways Services, other Adult Education and Literacy activities offered may include: Basic Literacy instruction and/or instruction in English as a second language; High School Equivalency Test (HiSet); contextualized career cluster Fast TRACK; College Transition Fast TRACK; Integrated education; Training with Adult Career and Technical Education; and, Adult workforce training and retraining. Education that is offered concurrently with workforce preparation activities and training for a specific occupation or occupational cluster may result, as appropriate.

There appears to be a supply and demand misalignment in the regional labor market. A gap exists between available jobs and unemployed individuals' skill levels, or lack thereof. And, employers continue to say there is a shortage of talent. The NPWDB, Inc. will work diligently to connect eligible individuals with training funding that provides high quality training so they can be more competitive in the workplace. Helping individuals with barriers to employment find jobs with family-sustaining wages is a priority for us. The NPWDB, Inc. will work to ensure that the long-term unemployed, in particular, are reconnected to the workforce. It is important to reach these individuals before their skills deteriorate or they become discouraged and leave the labor force altogether. Their absence from the workforce has a significant long-term negative effect on the region's economy and productivity overall. Another key challenge for the NPWDB, Inc. and its Core and Required Partners is to create a "Youth Pipeline" that will be adequately equipped to fill jobs of retirees and Older Workers now and in the future. In collaboration with Youth Services Systems, Inc. (YSS, Inc.), the local Youth Provider, and Core and Required Partners, the NPWDB, Inc. will work to build a youth workforce development system that addresses the need for a "Youth Pipeline" by ensuring the delivery of quality academic and workforce programs to In-School and Out-of-School Youth in the region. Youth Programs and Services are designed to provide Youth with job readiness, career exploration, Work Experiences and Life Skills necessary to successfully transition Youth into post-secondary education and/or employment.

In addition to year-round programs, the region's Summer Youth Work Experience Program provides Youth with job readiness training and paid work experience opportunities in "high demand" occupations that allow Youth to explore careers while working. Other work experience programs available to Youth in the region are the Fall Works Program; the Winter Works Program; and, the Spring Works Program. The NPWDB, Inc. and YSS, Inc. engage area employers on a regular and ongoing basis in an effort to help make more meaningful job opportunities available to area Youth.

Because we will be creating a “Youth Pipeline” of Youth with the experience and skills businesses require, our regional economy will be stronger and better. Other challenges that we will need to address include: Limited transportation available for job seekers; Broadening access of services to individuals in rural areas; and, Encouraging secondary and post-secondary systems, in particular, to expand education and training opportunities and degree and credentialing opportunities for job seekers.

There are strong partnerships already in place with local Economic Groups, Educational and Training Providers, Employers and Community-Based Organizations. The NPWDB, Inc. has a proven long-term track record of accountability, successful performance and effective business outreach methods in place. The NPWDB, Inc., Core and Required Partners feel confident we have the capacity to adequately provide high-quality Programs and Services in the region.

E) 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 the Performance Accountability Measures based on Primary Indicators of Performance described in Section 116 (b)(2)(A) of the WIOA in order to support the Local Area, Economic Growth and Economic Self-Sufficiency;

The NPWDB, Inc.’s vision is “to create a well-trained workforce-ready labor force by aligning training with skills and matching employers with qualified workers.” The region’s goals were developed in alignment with the Governor of West Virginia’s State Plan, Program Year 2020 – 2024.

❑ **GOALS**

#1. MAXIMIZE EFFICIENCY OF THE WORKFORCE DEVELOPMENT SYSTEM

The local workforce development system will be flexible in its service delivery. A Common Participant Intake/Referral Form is being used by Core and Required Partners in an effort to streamline the intake and referral process for participants and eliminate duplication. Integration and alignment of Core and Required Partners’ programs and services are altered as needed in order to adapt to the needs of both businesses and job seekers. Funding streams target specific populations (ie: individuals with barriers to employment, Older Youth, etc.). American Job Center Staff are properly trained, and cross-trained, to ensure familiarity with, and knowledge about, all available programs and services. American Job Center Staff actively engage businesses in employer programs and services. The most current labor market data drives decisions made that connect individuals to self-sustaining, “high demand” careers and/or training. Supportive Services are readily available to those in need. Core and Required Partners will work to strengthen data sharing by using the Mid-Atlantic Career Consortium (MACC) system.

#2. STRENGTHEN RELATIONSHIPS WITH EMPLOYERS

Training programs are aligned with area employer needs, especially those within “high demand” industries, so job seekers can ultimately secure good paying, self-sufficient jobs. When appropriate, employers are engaged in the design of training programs; Employers are asked to assist in the mapping of Career Pathways by providing input and

feedback. Employers play an active role in developing their Customized Training Program and Incumbent Worker Training Program. American Job Center Staff regularly communicate the cost savings that would result if Employers accessed the region's On-The-Job (OJT) Program for new their hires. When hiring, employers are provided access to regional American Job Centers' pools of trained participants. Employers are encouraged to offer internship opportunities and apprenticeship programs to participants. American Job Center Staff makes available the most recent labor market data. They also make available assessment, recruitment, applicant screening services available to area Employers.

#3. OVERCOME EMPLOYMENT BARRIERS OF INDIVIDUALS

Barriers like, having a disability; lacking education; having ineffective job search skills; being a recovery addict, having low Literacy skills; being homeless; being an ex-offender, etc. can negatively impact an individual's ability to secure self-sustaining employment. In an effort to help individuals overcome barriers, the NPWDB, Inc., Core and Required Partners target funding to create new, effective training opportunities for them. We increase their access to a wide array of career services, soft and life skills services and work-based training programs. We make attempts to increase Employers' use of work-based training programs that individuals with employment barriers can participate in. Youth programs and services are prioritized for In-School and Out-of-School Youth with barriers to employment, being pregnant or parenting or in the juvenile or Adult justice system. It is our intent to always promote and support an equitable, inclusive local workforce from outreach to service delivery strategies.

#4. PROMOTE CAREER PATHWAYS

The local workforce development system provides high quality education and training for skills that lead to family-sustaining employment in "high demand" jobs. Career Pathways Services are made available to eligible participants by Customer Career Planner/Data Control Coordinators at regional American Job Centers. Services are diverse with multiple entry and exit points that allow individuals with varying degrees of ability, including low-skilled Adults and Youth with multiple barriers to employment, especially those with disabilities, to have realistic access to pathways. The local workforce development system supports Career Pathways Services that help Adults and Youth enter the labor force and/or advance among multiple occupations, advance within an occupation or move to a new occupation that has similar skills to a previous occupation. Career Pathways Services have been developed in the following "high demand" occupations in the region: Advanced Manufacturing; CDL; Health Science; Audio/Video Technology & Communications; Finance; Education & Training; Business Management & Administration; Law, Public Safety & Security; Hospitality & Tourism; Architecture & Construction; Agriculture & Natural Resources; Transportation, Distribution & Logistics; IT. Government & Public Administration; Welding; and, Building Restoration, with more to be developed in the future. The goal is to create a Career Pathways system where education and training are provided and offers credentials that prepare individuals, regardless of their skill level(s) at the point of entry, for post-secondary education, training and/or employment.

#5. IDENTIFY AND MAXIMIZE POST-SECONDARY AND EMPLOYMENT OPPORTUNITIES FOR YOUTH

It is imperative to ensure area Youth have easy access to high quality programs and services that produce the best results for them. Career Pathways Services are made available to Youth. The NPWDB, Inc. and its Youth Provider, Youth Services Systems,

Inc. (YSS, Inc.) vigorously work to expose Youth to a wide range of available training and educational options in “high demand” industries so they will be able to effectively identify their career goal(s). Through a mix of meaningful work experiences, mentoring and training programs, the NPWDB, Inc. assists Youth in developing skills like, leadership, team-building, communications and problem solving. Youth Programs and Services offered to In-School and Out-of-School Youth will focus on measureable skill gains. Initiatives will be put in place by the NPWDB, Inc. to close skills gap for area Youth.

#6. ALIGN WV’S LABORFORCE PARTICIPATION RATE WITH THE NATIONAL LABOR FORCE PARTICIPATION RATE

West Virginia hit its lowest unemployment rate in State history at 3.7% in March, 2022, but the State continues to have the worst labor force participation rate in the country at only 55%. Unemployment continues to decrease in West Virginia as the State keeps breaking its own records for low unemployment. The unemployment rate has not seen an increase in twenty-three (23) straight months. However, the State’s unemployment rate is still slightly higher than the national unemployment rate, which is 3.6%. West Virginia’s labor force participation rate, however, remains unchanged from last month and is still the lowest in the nation at 55%. Its labor force participation rate is more than seven (7) percentage points lower than the national average, which is 62.4%. Subsequently, there are still a lot of West Virginians who are neither employed, nor looking for work despite record low unemployment rates. More or expanded job creation in the State is necessary to increase the State’s labor participation rate. Job creation in the goods producing, mining, construction, manufacturing sectors will put the State on a trajectory for job growth. Simply put, there is a need to develop more jobs either with new employers or existing ones in the State. And, when these jobs become available, employer programs and services like On-the-Job (OJT) Training; Customized Training; Incumbent Worker Training; and, Transitional Job Training need to be readily available for Employers to access. Additionally, substance abuse and its multiple effects remain the number one problem the State faces. The Center for Disease Control and Prevention figures show there were an estimate 1,519 drug overdose deaths in West Virginia from November 2020 – November 2021. This is a fifteen percent (15%) increase and a continuation of the ignominious distinction of our State having the highest overdose death rate per capita in the country. State and community leaders in West Virginia, health providers, emergency workers and addiction specialists continue to fight this battle every day. In our area, communities are adopting innovative strategies like quick response teams to try to get individuals into treatment promptly, then integrate them back into the local communities and workforce. This is no easy task. Drug addiction has permeated nearly every corner of West Virginia, cutting into the ability to provide a drug-free workforce. However, the NPWDB, Inc. has many working relationships already in place with existing employers, educational institutions and area treatment and drug rehabilitation programs which we lean on for participant referrals and support. Collectively, we all work together to ensure those impacted by the drug epidemic have a strong, comprehensive “network of support” to ensure work and life success for them and their families.

#7. USE LABOR MARKET DATA EFFECTIVELY

It is important that we have a good understanding of local, regional, State and national labor market data so we can determine needs of job seekers and demands of employers. In an effort to more effectively understand the demands of local employers and the needs of job seekers, the NPWDB, Inc. closely evaluates labor market data several times throughout the program year to determine trends in the job market. Labor market

updates are completed no less than twice a program year and are shared with employers and community leaders through regular speaking engagements, local media coverage and Core and Required Partner notifications. Labor market data is always used to guide our support for training in “high demand” occupations.

#8. DEVELOP AND SUPPORT PRE AND REGISTERED APPRENTICESHIP PROGRAMS

The Workforce Innovation & Opportunity Act (WIOA) provides an opportunity for the local workforce development system to transform and improve the quality of life for job seekers and workers through pre and registered Apprenticeship Programs. any sector strategies or Career Pathways developed will be at the heart of available Apprenticeship Programs. The foundation of Apprenticeship Programs is deep industry engagement that can further the local workforce development system’s efforts to support and improve regional economics. Apprenticeship Programs are made available to Labor Unions, Employers, Adults, Dislocated Workers and Older Youth.

#9. MEET PERFORMANCE ACCOUNTABILITY MEASURES

The NPWDB, Inc. always strives to meet and/or exceed negotiated performance measures for its WIOA funded Programs and Services. The NPWDB, Inc. works closely with Core Partners, Training Providers, Sub-Grantees/ Contractors to make them aware of the importance of meeting or exceeding them through regular and ongoing communications. The NPWDB, Inc. provides these stakeholders with the status of performance measures no less than once a quarter through regular and ongoing communications. Specific language about performance measures is included in all NPWDB, Inc. performance-based contractual agreements. Future funding is dependent on these entities meeting or exceeding performance measures. The NPWDB, Inc. uses an internal database to track participant services and outcomes. If necessary, any corrective action with regard to program performance is taken by the NPWDB, Inc. prior to performance measure outcomes becoming final. Tracking participant data lets us know where we need to provide technical assistance and to which providers of training. The NPWDB, Inc. monitors Training Providers, Sub-Grantees and Contractors no less than two (2) times each program year to review and evaluate the delivery of program curriculum and program performance and address any noted issues. A Corrective Action Plan (CAP) is provided to the NPWDB, Inc. from Training Providers, sub-grantees and contractors should it be recognized that program performance is not being met. In an effort to meet and/or exceed performance measures, we align ourselves with Training Providers, sub-grantees and contractors that work closely with “high demand” industry sectors to ensure Adult and Youth Participants are exposed to “high demand” training that will ultimately lead to permanent employment with family-sustaining wages. Partnerships provide us with insight that helps with the development of: Training curriculum; Career Pathways Services; Career exploration activities; Work-based learning opportunities; and, Industry-recognized credentials. The NPWDB, Inc. also encourages input about credentialing requirements in “high demand” occupations or jobs within specific “high demand” industries from area education, labor and Veteran institutions/organizations. The NPWDB, Inc. strongly emphasizes placements in employment or post-secondary education with the attainment of industry-recognized credentials. Performance measures include participation in employment, postsecondary education or the military in the 4th quarter after exit for Youth Programs and Services for the first time. The NPWDB, Inc. assists Youth Services Systems, Inc., (YSS, Inc.), the region’s Youth Provider, with implementing “best practices” for Follow-Up Services in order to retain Youth Participants who have historically been more attached to the local workforce development system than Adults. Beyond those required by WIOA, the NPWDB, Inc. may also implement additional Adult, Dislocated Worker and Youth performance measures to ensure success.

F) Taking into Account Analysis described in Subparagraph (A) through (D), Describe a Strategy to work with the Entities that carry out the Core Programs to align Resources available to the Local Area, to achieve Strategic Vision and Goals described in Subparagraph (E).

The NPWDB, Inc. works collaboratively with entities of Core Programs to align and access resources that are available in the region to support its objectives.

Memorandums of Understanding (MOUs) are in place with entities that carry out Core Programs and Services. MOUs help facilitate an integrated local workforce development system. Staff from Core Programs will be housed, either on a full or part-time basis, at regional American Job Centers creating a seamless access to a variety of programs and services. Entities of Core Programs have agreed to use a combination of co-location and technology strategies to ensure access to integrated services. The following priorities have been developed to carry out Core Programs, align resources and to achieve the vision and goals described in Subparagraph (E): Provide effective oversight of funding to ensure greater return on investment; Assist area businesses to remain competitive by hiring and retaining talent essential to meet current and future workforce needs; Ensure that individuals with barriers to employment reach their full career potential by equipping them with the necessary skills and credentials to secure jobs with family-sustaining wages; Develop sector strategies in "high demand" industries; and, Develop and maintain a local workforce development system that has a positive impact on the local and regional economy. Our goal is to create a stronger partnership between the NPWDB, Inc. and entities of Core Programs and build a network of Training Providers that seamlessly meet the needs of job seekers.

The Board of Directors created the following four (4) Sub-Committees that are responsible for ensuring goals of the local workforce development system are being met. They are:

- ❑ **The Executive Committee**: Develops and reviews NPWDB, Inc. budgets; Maintains accurate financial records of the NPWDB, Inc.; Approves expenditures on behalf of the NPWDB, Inc.; Sets policy direction for workforce activities in the region; Initiates corrective action for Training Providers, Sub-Grantee(s) and Contractors as needed to ensure compliance with the Workforce Innovation & Opportunity Act (WIOA); Oversees and addresses personnel and management issues at the NPWDB, Inc. and regional American Job Centers; and, Establishes priorities for reviewing Requests for Proposals (RFPs).
- ❑ **The One Stop Committee**: Oversees the development and management of the American Job Center system; Ensures local performance for the region are being met and/or exceeded by reviewing levels of performance on a regular basis throughout the program year; Ensures that high quality Programs and Services are being provided to individuals with barriers to employment; Solicits and review Request For Proposals (RFPs) received from potential One Stop Operator(s), Sub-Grantees and Contractors; and, Ensures Memorandums of Understandings (MOUs) are in place with Core and Required Partners;
- ❑ **The Youth Committee**: Oversees the successful delivery of Programs and Services to In-School and Out-of-School Youth; Solicits and reviews Request for Proposals (RFPs) received from potential Providers of Youth Programs and Services; Recommends funding

awards for Sub-Grantee(s) of Youth Programs and Services to the Board of Directors; Ensures Youth with disabilities are provided with adequate and effective Programs and Services; and, Reviews levels of performance for Youth Programs and Services on a regular basis to ensure they are being met.

□ **The Committee that Serves Individuals with Disabilities:** Oversees the delivering of Programs and Services to individuals with disabilities; Assists in the development of educational and job opportunities for individuals with disabilities to ensure that a wide range of educational and job opportunities and Support Services are available to them; Ensures regional American Job Centers are in compliance with Section 188, and other applicable provisions, of the Americans with Disabilities Act of 1990 ensuring individuals with disabilities have programmatic and physical access to services, programs and activities; and, Ensures Staff at American Job Centers is properly trained to address the needs of individuals with disabilities.



1 Open jobs hit a record 11 million in July as reported by the BLS in their Job Openings and Labor Turnover Summary.

***KPVI News, April 14, 2022.**

SECTION 2: ALIGNMENT OF THE LOCAL WORKFORCE DEVELOPMENT SYSTEM

A) A Description of the Workforce Development System in the Local Area that identifies the Programs that are included in the System and how the Local Board will work with the Entities carrying out Core and other Workforce Development Programs identified in the State Plan. The Description should also include how the Local Board and the Programs identified plan to align and integrate Services to Customers. The Description should also include Programs of Study authorized under the Carl D. Perkins Career and Technical Education Act of 2006;

Some of the principles that guide the local workforce development system are:

- ❑ The elimination of the sequence of services. Participants will not be required to pass through multiple layers of services before entering into training. Core and intensive services will be combined into a new category called "Career Services."
- ❑ This change will give Job Center Operator, Core and Required Partner Staff the flexibility to provide access to training based on assessed need;
- ❑ More flexible training delivery options to meet the need of low income individuals. Eligible Training Providers will supply training for jobs in "high demand" occupations or industry sectors rather than solely relying on Individual Training Accounts (ITAs). This increased flexibility will help to better scale innovative and effective models for obtaining industry recognized credentials, including integrated education and training approaches, Career Pathways, industry or sector partnerships and other evidence-based approaches that reflect best practices. Pay for performance contracts may be used as a form of training delivery. These options will help enhance services and avoid duplication of services;
- ❑ Improvements in the integration of education and training by creating effective Career Pathways that lead to industry recognized credentials. Work-Based Learning and use technology to accelerate learning and promote college and career success will be accessed;
- ❑ The delivery of extensive career and training services to participants;
- ❑ There will be a priority for training programs that lead to post-secondary credentials and are aligned with "high demand" industry sectors or occupations;
- ❑ Focus will be broadened for Adult Education, Literacy and English language services that will include transitions to post-secondary education and employment;
- ❑ The use of new models, such as integrated education and training and workforce preparation activities, will be encouraged; and,
- ❑ English Literacy and civics education for workforce training will be integrated.

Stakeholders in the local workforce development system are: Job seekers; Core program providers and other required Partners; Training Providers including those in post-secondary educational; and, Employers. Each of these stakeholders plays a distinctive yet integral role in the local workforce development system. They are responsible for maximizing resource sharing and holding entities accountable. Core and Required Partner programs and services are jointly responsible for workforce and economic development, educational and other human resource programs that creates a seamless "customer-focused" local workforce development system that integrates

service delivery across all programs and enhances access to programs' services. The NPWDB, Inc. has taken a number of important steps to meet new requirements under the Workforce Innovation & Opportunity Act (WIOA), like: Ensuring that regional American Job Centers house a team of Core and Required Partners who provide a wide array of programs and services to job seekers and employers; and, Incorporating an integrated intake and referral process for customers by properly training Job Center Operator, Core and Required Partner Staff through capacity building, cross training and staff training. The NPWDB, Inc., Core and Required Partners adopted "cross-system" approaches to address available employment, education and training opportunities within the local workforce development system. Collectively, we: Provide job seekers with the skills and credential necessary to secure and advance in employment with family-sustaining wages; Provide access and opportunities to all job seekers, including individuals with barriers to employment such as individuals with disabilities, to prepare for, obtain, retain and advance in high quality jobs and "high demand" careers; Enable businesses and employers to easily identify and hire skilled workers and other supports, including education and training for their current workforce; Participate in rigorous evaluations that support continuous improvement of American Job Centers by identifying which strategies work better for different populations; Ensure that high quality integrated data inform decisions made by policy makers, job seekers and employers; and, Recruit individuals, especially those with barriers to employment, into Core Programs and career services.

Core Programs included in the local workforce development system are:

❑ **TITLE I – TRAINING PROGRAMS.**

These programs are the primary source for federal workforce development funding that help prepare low-income Adults, Dislocated Workers and Youth for employment and also help them continue to build on their skill levels once they are employed. A number of high quality programs and services are made available to Adults, Dislocated Workers and Youth at regional American Job Centers, like: Objective Assessments; Career Pathways Services; Case Management and Eligibility Services; Soft Skills Training; Occupational Training in "high demand" industries; Training that leads to Industry-Recognized Certification; Pre and Registered Apprenticeship Training; On-the-Job (OJT) Training Program; Basic Skills Training; Job Development and Placement Services; and, Supportive Services. Additional services provided to Dislocated Workers include, but are not limited to: Relocation Assistance; and, Retraining Programs. Additional services provided to Youth target the acquisition of the required fourteen (14) program elements; access to High School Equivalency Test (HiSet); and, Work Experience Programs and Internships. Typically, training programs will be provided on site and electronically.

❑ **TITLE II ADULT EDUCATION AND LITERACY PROGRAMS.**

The Workforce Innovation & Opportunity Act (WIOA) provided new opportunities for the local workforce development system and Adult Education (AE) and Literacy programs system to work together. By coordinating with the AE system, there is more emphasis on serving low-skilled Adults. A determination is made as to whether providers are serving individuals who are most in need of AE and Literacy services, including those with low levels of Literacy skills or those who are English language learners and the past effectiveness of providers in improving Literacy eligible individuals, especially with respect to individuals who have low levels of

Literacy. For individuals who are deficient in basic skills, AE is a critical Partner in establishing Career Pathways Services. AE services allow individuals to acquire basic skills and English language services necessary to function in today's society so that they can benefit from the completion of secondary school. AE services include: Work readiness; Workplace preparation; Career awareness and planning; and, Case management services. AE Staff helps individuals address barriers to participation in AE Programs and help individuals use employment and/or postsecondary education or training to prepare and plan for entry into a Career Pathway. AE staff assists individuals in the preparation of the High School Equivalency Test (HiSet) and offer testing for the HiSet at various sites and times in the region. Individuals are also connected to needed Supportive Services like: Child care; Transportation, Housing; and, Health Care, to name a few. AE services are provided by the Mountain State Educational Services Cooperative (MSESC) at regional American Job Centers. MSESC assists individuals in becoming literate and obtaining the knowledge and skills necessary for employment and self-sufficiency. They also assist individuals who are parent or family members to become involved in the educational development of their children that will then lead to sustainable improvement in the economic opportunities of their family and assist individuals in attaining a secondary school diploma and in the transition to post-secondary education and training including through Career Pathways. MSESC assists English language learners with improving their English reading, writing, speaking comprehension, mathematics skills and acquiring an understanding of the American system of government. MSESC also provides the following services in the region: Distribution of promotional and informational materials for the purpose of outreach; Intake and orientation that will include class locations, contact information and available services, resource and tools; Appropriate services, tools and resources to customers based on need and eligibility; Customized Training to select individuals based on need and eligibility in cooperation and collaboration with area employers, post-secondary institutions and other training providers for employment, continuing education; Upgrading of skills and preparation for a high school equivalency credential; Specialized Training Programs, like Career Pathways, that combine workplace training with related technology instruction which may include or result in eligibility for industry standard credentials; Supportive Services that may include, but are not limited to, career counseling, academic advising, Career Pathways and track options, job search strategies, employer contacts, post-secondary training and transition options and Internship options; and, A follow-up tracking system for customers served in AE program for the purpose of program reporting and data collection. These programs are provided on site and electronically. The NPWDB, Inc. is waiting for guidance from the WorkForce West Virginia Office before developing a local process for reviewing local applications under Title II. But, applications submitted under WIOA Title II Adult Education and Literacy will be reviewed and ultimately approved by the Board of Directors. And, eligible Providers will be ones that have demonstrated effectiveness in delivering Adult Education and Literacy activities. Eligible Providers include but are not limited to: Local education agencies; Community-based organizations; Institutions of higher education; and, Libraries.

□ TITLE III – WAGNER-PEYSER SERVICES.

Wagner-Peyser Services are provided by WorkForce West Virginia at regional American Job Centers.¹ Wagner-Peyser Staff provides employment services to job seekers and employers. Services to job seekers include: Resume writing; Career exploration activities; Job search assistance and placement; Career counseling; Needs and interest assessments; Workshops; and, Case management services. Services for employers include: Developing and posting job orders; and, Referrals of qualified job seekers to job openings. Both job seekers and employers are provided with labor market data. WorkForce West Virginia Staff will inform Unemployment Insurance (UI) claimants of available Partner training opportunities during new claims group meetings as well as in

specialized workshops. WorkForce West Virginia Staff will make referrals to Partner training opportunities manually and through the Mid-Atlantic Career Consortium (MACC) system. Proper training of Staff and effective communications will help to expedite participant referrals among Partners without duplication of services. Information and data is collected and shared with Partners. Program accessibility for those with disabilities will be delivered via an onsite interpreter and Americans with Disabilities Act (ADA) compliant technology. Proper ADA training is provided to WorkForce West Virginia Staff regularly throughout the program year. These services will be provided on site and electronically.

□ TITLE IV – VOCATIONAL REHABILITATION SERVICES.

Vocational Rehabilitation Services help individuals with disabilities prepare for, obtain or maintain employment. Services are usually provided on an individual basis and are tailored to meet the individual's needs. Counselors assist clients by assessing needs and assisting them in identifying vocational goals and services. An individualized employment plan (IEP) is developed outlining vocational objectives, services, providers and responsibilities. Counseling and guidance diagnostic services, training restoration services assessment, information and referrals job development, and placement, as well as other supportive Services like readers or sign language interpreters are available. These services are provided by West Virginia Division of Rehabilitation Services (WVDRS) Staff at regional American Job Centers. WVDRS Staff strives to align its activities and services with other agencies, including Partners. WVDRS Staff works in tandem with the Adult Education (AE) and Literacy Program Provider, referring customers as needed, to ensure individuals with disabilities have an adequate opportunity to obtain a completed high school level education. These services will be provided on site and electronically.

The NPWDB, Inc. works closely with Core Partners to align resources in the delivery of Core Programs through co-location and participant referrals. The NPWDB, Inc. works continually to strengthen connections among Core Program Providers to ensure cohesive alignment of Title I Adult and Youth Programs and Services, Adult Education (AE) and Literacy programs, Vocational Rehabilitation Programs and Wagner-Peyser Programs at regional American Job Centers. Core Program Providers deliver programs and services they carry out according to their respective governing laws. It's through the leveraging of these Programs and Services and resources that optimum outcomes can be achieved. American Job Center and Core Partner Staff are aligned functionally rather than by program. Aligned functions include, but are not limited to: Greeting and initial intake and assessment of customers; Skill and career development assessment that includes the provision of career and training services; A good understanding of current local labor market supply and demand; and, Business services that include building relationships with employers through Career Pathways design, sector partnerships and talent pipeline development. This alignment offers job seekers and employers direct access to a broad range of services that can be adapted and leveraged to address an individual's needs. Individuals seeking assistance through the local workforce development system can access job matching services online or in person. Job Center Operator and Core Partner Staff is available to provide direct assistance to customers in both group and individual settings and self-service resources are available in Resource Rooms at American Job Centers. Job Center and Core Partner Staff will distribute information about their respective programs and services to job seekers and employers alike. In particular, alignment of Core Partner Programs includes establishing effective Career Pathways that combine education, training and Supportive Services to prepare individuals for jobs. Given individuals' needs and career goals, Career Pathways help guide them to the appropriate Programs

and Services. A Strategic Plan that highlights how Core Programs and Services are coordinated and delivered was developed by NPWDB, Inc., Core and Required Partner Staff. It is important all entities effectively and efficiently provide integrated services to our job seeking and employer customers.

OTHER REQUIRED PARTNERS

❑ **PROGRAMS AUTHORIZED UNDER SECTION 403(A) (5) OF THE SOCIAL SECURITY ACT;** These services and activities are introduced to customers at American Job Centers. These services enable Adults to acquire job and educational training skills necessary to secure and maintain long-term employment and self-sufficiency. Services provided by the recipient of these funds include, but are not limited to: Training programs; Job placement assistance; Job search assistance; and Supportive Services. These services are provided by the West Virginia Department of Health and Human Resources (WVDHHR).² These services will be provided electronically.

❑ **ACTIVITIES AUTHORIZED UNDER TITLE V OF THE OLDER AMERICANS ACT OF 1965;** Services and activities under the Title V Older American's Act of 1965 are made available to customers at American Job Centers in an effort to meet the needs of Older Individuals. Assessment, job search assistance, counseling and other Supportive Services are provided for individuals, 55 years of age or older, searching for full or part-time employment. These services are provided by the National Council On Aging (NCOA). These activities will be provided on site and electronically.

❑ **POST-SECONDARY VOCATIONAL EDUCATION ACTIVITIES & PROGRAMS AUTHORIZED UNDER THE CARL D. PERKINS VOCATIONAL AND APPLIED TECHNOLOGY EDUCATION ACT of 2006;** These services include, but are not limited to: Initial assessment of skill levels; Aptitude testing; Job placement assistance; Career guidance; Academic counseling services; and, Supportive Services. These services are provided by the West Virginia Northern Community College (WVNCC) and the West Virginia Department of Education (WVDOE). These activities will be provided on site and electronically.

❑ **ACTIVITIES AUTHORIZED UNDER CHAPTER 2 OF TITLE II OF THE TRADE ACT OF 1974;** A variety of services are provided to eligible workers whose jobs were lost at no fault of their own. Funds may be granted after qualification determination is made to help regional American Job Centers. Subsequently, WVDHHR Staff is not required to physically be located at American Job Centers. In our region, they are not. Services provided include, but are not limited to: Eligibility/assessment determination; Job placement assistance; Career guidance; work; and, Supportive Services. These services are provided by WorkForce West Virginia. These activities will be provided on site and electronically.

❑ **ACTIVITIES AUTHORIZED UNDER CHAPTER 41 OF TITLE 38;** Activities authorized under Chapter 41 of Title 38, U.S.C., Veteran's Employment Representatives and Disabled Veterans Outreach Programs are also provided. They include, but are not limited to: Assessment of skill levels; Referral Services; Occupational Skills Training; Job Placement assistance; Career guidance; Counseling Services; and, Supportive Services. These services are provided by WorkForce West Virginia's Jobs for Veterans Program. The NPWDB, Inc. links with WorkForce West Virginia's Jobs for Veterans Program and other local Veteran agencies to provide various workshops for Veterans throughout the program year. These workshops address employment opportunities within "high demand" industries among other things. These activities will be provided on site and electronically.

❑ **EMPLOYMENT AND TRAINING ACTIVITIES CARRIED OUT UNDER THE COMMUNITY SERVICES BLOCK GRANT ACT;** These services and activities expand economic opportunities for low-to-moderate income individuals. Services include but are not limited to: Community revitalization; and, Redevelopment of property and

assistance to for-profit businesses with regard to special economic development activities. These funds help prepare eligible individuals for employment opportunities through education and Training Programs. These services are provided by the recipient(s) of these funds. These activities will be provided electronically.

□ EMPLOYMENT AND TRAINING ACTIVITIES CARRIED OUT BY THE

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT; These services enable Adults to acquire the job skills necessary to secure employment in today's world of work. Services provided by the recipient(s) of these funds include, but are not limited to: Training Programs; Job placement assistance; and, Supportive Services. These activities will be provided electronically.

□ PROGRAMS AUTHORIZED UNDER THE STATE UNEMPLOYMENT

COMPENSATION LAWS; AND, Individuals have access to, and file a claim for, unemployment compensation. Services include, but are not limited to: Assessment services; Job placement assistance; Job referral assistance; and, Career guidance and counseling. These services are provided by WorkForce West Virginia. Effective and regular communications will be the key to strengthening ties between regional American Job Centers and Unemployment Insurance Programs. These activities will be provided on site and electronically.

□ PROGRAMS AUTHORIZED UNDER SECTION 212 OF THE SECOND CHANCE

ACT OF 2007. These Programs enable ex-offenders and individuals from within the criminal justice system to acquire the job and training skills necessary to secure long-term employment. Services provided include, but are not limited to: Work readiness skills training; Training Programs; Job placement assistance; and Supportive Services. These services are provided by the Lee Day Report Center. These activities will be provided on site.

WIOA also authorizes programs for specific vulnerable populations, including the Job Corps, YouthBuild, Indian and Native Americans and Migrant and Seasonal Farmworkers programs. Other "optional" Partners may include: Provider(s) of Title IV of the Social Security Act Programs; Provider(s) of Programs authorized under Section 6(d)(4) of the Food Stamp Act of 1977 and Work Programs authorized under Section 6(o) of the Food Stamp Act of 1977; Provider(s) of Programs authorized under the National and Community Service Act of 1990; and, Other appropriate federal, State, or local Programs, including Programs in the Private Sector.

B) A Description of how the Local Board working with the Entities identified in A) will expand access to Employment, Training, Education and Supportive Services for eligible Individuals, particularly eligible Individuals with Barriers to Employment, including how the Local Board will facilitate the Development of Career Pathways and Co-Enrollment, as appropriate, and 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;

Efforts will be taken to further expand access to employment, training, education and Supportive Services by: Increasing focus on serving low income Adults and Youth who have limited skills, lack work experience and face other barriers that stand in the way of economic success; Regularly expanding education and training opportunities; Helping eligible Adults and Youth "earn while they learn" through available Supportive

Services. Work-based training opportunities give underprepared Adults and Youth the chance to earn income while also receiving training and developing essential skills that are best learned on the job. Training is tied to “high demand” occupations (through encouraging employers and industry sectors to define needed skills); and, Making available effective employment-based activities. Examples of available Supportive Services include, but are not limited to: Intensive case management services; Rehabilitation services; Job coaching; and, In-depth assessment services that include disability screening, functional needs assessment and vocation assessment which will be made available by appropriate Core and/or Required Partners.

Far too often, educational programs at post-secondary institutions lag behind labor’s needs. Curriculum in “high demand” programs of study are not always aligned with requirements of industry-based skills certifications that ensure graduates have the knowledge and skills required for jobs in today’s workforce. With industry-based skills certifications, individuals would be able to validate the talent and skill levels they bring to the job. Graduates will increase their career opportunities and earning potentials. Transferable skills will be enhanced. And, employers will have a level of certainty about the skill level of an individual before hiring them; thereby reducing training costs and turnover, as well as enhancing workplace safety. The employer will witness increased productivity and an improved quality of his/her workforce. Industry-based skills certifications are beneficial to all. Individuals need to be provided with the opportunity to both learn and earn by acquiring shorter term credentials with labor market value even as they continue to build on these to access more advance jobs and higher wages. Industry-based skills certifications can validate an individual’s knowledge and skills as compared to industry standards because it provides an objective assessment of skill level. Stackable industry-based skills certifications focus on basic academic and workplace skills.

There needs to be a collaborative and shared responsibility between the NPWDB, Inc., Core and Required Partners, especially those who are educational and training institutions. Implementing industry-related skills certification involves multiple steps that may take anywhere from several months to a few years. Below are some of the steps already taken, to be taken, to ensure successful implementation:

- ❑ **Identify State/Regional Economic Demands.** Use State and regional economic data to guide decision-making. Identify potential “high growth” industries, projected worker demands and “high demand” occupations;
- ❑ **Identify Available Resources.** Consider all resources and expertise already available in the region that would support industry-related skills certification;
- ❑ **Engage Industry Leaders.** Build a pool of certified workers for area employers. Engage businesses and labor associations;
- ❑ **Recruit Community Support.** Involve not only Core and Required Partners, but also community-based agencies, Chambers of Commerce, State and local leaders, business and labor organizations, etc. in the decision-making process;
- ❑ **Align Programs to Certification Requirements.** Encourage area colleges and schools to analyze existing curriculum against the needs of targeted industry-related skills certifications. Colleges and schools need to identify gaps in existing curriculum then develop new curriculum to fill gaps;
- ❑ **Build Partnerships to Support Efforts.** Identify Core and Required Partners that can refer potential eligible individuals to Adult Education (AE) and Community and Technical Schools. Collaborate with secondary, community and four (4) year colleges

and schools to develop necessary agreements to maximize transfers of course credits. Aggressively encourage STEM skills training (Science, Technology, Engineering, Mathematics) be implemented into career technical curriculum. Recruit Core and Required Partners to assist with job placement. Meet regularly with Core and Required Partners and educational and training institutions to share progress;

❑ **Design Effective Career Pathways Services based on “high demand”**

occupations. Develop Career Pathways Services that connect levels of education, training, support services and credentials in a way that optimizes the progress and success of individuals with varying levels of abilities and needs. Objective assessments need to be completed for Youth for the purpose of identifying appropriate services and Career Pathways. Adult Education (AE) activities need to be aligned with other available Core Programs in the region, including the development and delivery of Career Pathways. The Career Pathways system needs to encompass education and training strategies that go from the acquisition of skills and credentials to the advancement of higher levels of employment within “high demand” sectors and industries. A strong Career Pathways system will provide individuals most at risk of dropping out-of-school or failing to graduate college with opportunities they need to obtain and build upon credentials. Career Pathways Services are linked to the State’s Eligible Training Provider List (ETPL) in an effort to help job seekers understand viable options available to them and how training can be leveraged for success. Career Pathways Services have multiple on/off entrances and exits and is flexible so individuals can achieve goals with minimal disruption to their employment histories;

❑ **Incorporate Real-World Learning Experiences.** Work closely with employers to incorporate as many real world experiences as possible into the program and curriculum design, like, job shadowing, Internships, Pre-Apprenticeship opportunities; and,

❑ **Measure Performance.** Identify performance measures to serve as benchmarks for measuring progress. Collect participant data on a regular basis to assess actual vs. planned progress.

The NPWDB, Inc. places strong importance on serving individuals with barriers to employment. The NPWDB, Inc. works to leverage partnerships to expand access to programs and services and explore co-enrollment for this target group. The NPWDB, Inc. works with Core and Required Partners to identify individuals who are considered “priority” at the point of entry at regional American Job Centers. Individuals identified with barriers to employment receive programs and services they need to be successful in the labor force. Planning and accountability procedures are aligned across the NPWDB, Inc., Core and Required Partner programs and services in an effort to support a more unified approach to serving this target group. The NPWDB, Inc. adheres to State and local eligibility policies to identify individuals with barriers to employment.

Individuals with barriers to employment often need a comprehensive set of support that involves many services that help them ultimately earn secondary and post-secondary credentials and then transition into the labor force. In an effort to encourage more eligible individuals to enter into non-traditional occupations, Job Center Operator Staff reviews the region’s most current labor market data with them. Labor market data details all training being offered, not only in “high demand” industry occupations but also in non-traditional “high demand” occupations. Job Center Staff carefully interprets labor market data to eligible individuals that includes average earnings per occupation, the type(s) and length(s) of training and degree/certification required for employment. Labor market data is used as a way to inform, prepare and educate individuals on jobs and training in “high demand.” Job Center Operator Staff also reviews the region’s long-term and short-term Training Provider Listing of

occupations. The NPWDB, Inc. encourages the facilitation of Career Pathways Services and co-enrollment in a Core Program(s), as appropriate, in an effort to improve access to activities that lead to a recognized postsecondary credential. So, if necessary and appropriate, the NPWDB, Inc. may arrange for an individual to be co-enrolled in Career Pathways Services and a Core Program(s). Job seekers who are without a high school diploma or a High School Equivalency Test (HiSet) or are basic skills deficient will be referred to the provider(s) of Title II Services before participating in Occupational Skills Training. Recognizing that Title III Wager-Peyser programs represent one (1) of the main entry points to the local workforce development system for a large share of job seekers, workshops will be offered that include a discussion of available Title I Services. The NPWDB, Inc. works closely with Core and Required Partner Staff to identify models for co-enrollment for Adults and Youth with disabilities in order to ensure this target group is provided with a series of vigorous Career Services. The NPWDB, Inc., Core and Required Partners may explore outside partnerships with local social service agencies to provide additional Supportive Services necessary for this target group while they work on their job readiness skills.

C) A Description of the Steps taken by the Local Board to engage entities in A) in the Formulation of its Local Plan;

The NPWDB, Inc. recognizes the value and importance of engaging the public and key stakeholders in the development of the Local Plan. Input is critical to ensuring that the Local Plan is a comprehensive document that works for every organization within the local workforce development system that serves job seekers and area employers. During the preparation of the Local Plan, NPWDB, Inc. Staff requested input from Core and Required Partners and other key stakeholders, like: Area employers; Training Providers; Educational and training institutions; Labor organizations; and, Economic development organizations. Core and Required Partners, in particular, assisted in preparing and drafting the Local Plan.

Feedback received about the Local Plan is first reviewed by NPWDB, Inc. Staff. NPWDB, Inc. Staff then compiles feedback and presents it to the Board of Director's One Stop Committee for review and discussion. One Stop Committee members approves feedback be included in the Local Plan in consideration of Workforce Innovation & Opportunity Act (WIOA) rules and regulations. The One Stop Committee then makes recommendations of modifications to the Local Plan to the Board of Directors. The Board of Directors had final authority on all modifications made to the Local Plan based on feedback received. Modifications are then included in the final version of the Local Plan. All feedback received is maintained at the NPWDB, Inc. Office.

D) A Description of the Strategies and Services that will be used in the Local Area;

1. To Facilitate Engagement of Businesses, including Small Businesses and Businesses in High Demand Industry Sectors and Occupations, in Workforce Development Programs.

The NPWDB, Inc., Core and Required Partners believe that coordinating with businesses,

especially small businesses and businesses in “high demand” industries, is crucial to improving the local workforce development system. Our priority is to increase training and education for job seekers, including those with barriers to employment, to meet the needs of employers, existing and emerging, small, mid-size or large, in “high demand” industries. To do this, it is imperative we stay informed of trends in employment including changes in education and training requirements. Through regular meetings and frequent communications between the NPWDB, Inc., Core and Required Partners, we are kept informed of emerging careers and occupations through the sharing of current labor market data.

The NPWDB, Inc. ensures workforce development activities are meeting the needs of employers by facilitating effective employer utilization of the local workforce development system. The NPWDB, Inc. has a Business Services Team (BST) in place that focuses on encouraging and promoting greater employer involvement at regional American Job Centers. BST members consist of Core and Required Partners, representatives from economic development groups and area businesses. Each member is cross-trained in understanding each other’s Employer Programs and Services. The BST ensures they are providing services to businesses small, mid-size and large which fall within “high demand” industry sectors. To facilitate engagement with businesses, the BST initiates outreach efforts to businesses to gain a better understanding of workforce needs and challenges and establish industry sector partnerships to develop strategies and solutions to address challenges within particular “high demand” industries. Adult Education (AE), a Core Partner, plays an active role by using their expertise to better prepare individuals entering the workforce and educating Incumbent Workers within sector partnership activities. AE also helps identify available outside resources for employers and coordinate workforce development programs with economic development partners and employers.

One of the main objectives of the BST will be to recruit businesses, especially small ones, from “high demand” industries, like, healthcare, construction, retail, utilities, manufacturing and professional and technical services to access American Job Center job seeker pools that will consist of individuals who have acquired the necessary Occupational Skills Training in “high demand” occupations and industries. To meet the demands of employers, it is the goal of the BST to ensure job seekers are “job-ready.”

The purpose of the BST is to “help businesses grow and create jobs by bringing a strategic and collaborative approach to solving their workforce issues and expanding their opportunities.” There will be five (5) Steps involved in the BST process. They are: Step 1: Target and prioritize businesses for outreach; Step 2: Create an interview process to obtain information directly from the employer; Step 3: Develop a responsive proposal with BST members’ input; Step 4: Create a plan of service for the employer; and, Step 5: Continually seek ways to assist the business as it deals with changing workforce conditions over time.

Currently, there are twenty-two (22) area organizations who are members of the NPWDB, Inc.’s BST. They are: The Brooke County Economic Development Authority; Belmont College; Brooke Hancock Family Resource Network; The Marshall County Chamber of Commerce; The Tyler County Development Authority, Inc.; The Wheeling Area Chamber of Commerce, WVNCC; The Robert C. Byrd Institute; The John D. Rockefeller Center; The Brooke County CTC; The Ohio County Resource Network; The Ohio County CTC; The Follansbee Chamber of Commerce; Belomar Regional Council; The Wetzel County CTC; The Weirton Chamber of Commerce; Mountain State Education Cooperative; WesBanco; National Council on Aging (NCOA); Marshall County Schools; The Jobs & Hope Program; and, West Virginia Department of Rehabilitation Services.

We intend to continue using different outreach strategies to promote programs and services to businesses. Job Center Operator and WorkForce West Virginia Staff makes regular onsite visits to employer sites as a way to introduce American Job Center Programs and Services to them and periodically speak at area business events and functions in the region. Job Center Operator Staff coordinates and/or participates in in-state and out-of-state job fairs and workshops. Job Center Operator Staff regularly sends mailings and e-mailings to businesses that describe available American Job Center programs and services. Employers will have access to the statewide Mid-Atlantic Career Consortium (MACC) system to do self-postings of job openings and view job seeker searches. Area employers can access the NPWDB, Inc.'s website which details employer programs and services. American Job Centers coordinate with WorkForce West Virginia on executing employer job orders. Job Center Operator and WorkForce West Virginia Staff encourage area employers to utilize space at American Job Centers for hiring, interviewing and screening of applicants. WorkForce West Virginia Staff offers office space to business representatives for on-site job fairs.

WorkForce West Virginia shares event notices so job seekers in other regions around the State are made aware of various event happenings in the region in case they are willing to relocate. They also share job order details with other WorkForce West Virginia Offices for the same reasons. Labor market information that includes specific "high demand" data that is relevant at the time is also provided to employers upon request. The NPWDB, Inc., Core or Required Partner Staff serve on the following business committees and groups in the region: Regional Economic Development Partnership (REDP); Economic Development Group of Brooke and Hancock counties; Local Chambers of Commerce; and, Other employer-specific organizations and public-private partnerships. These partnerships help us identify and address key workforce challenges.

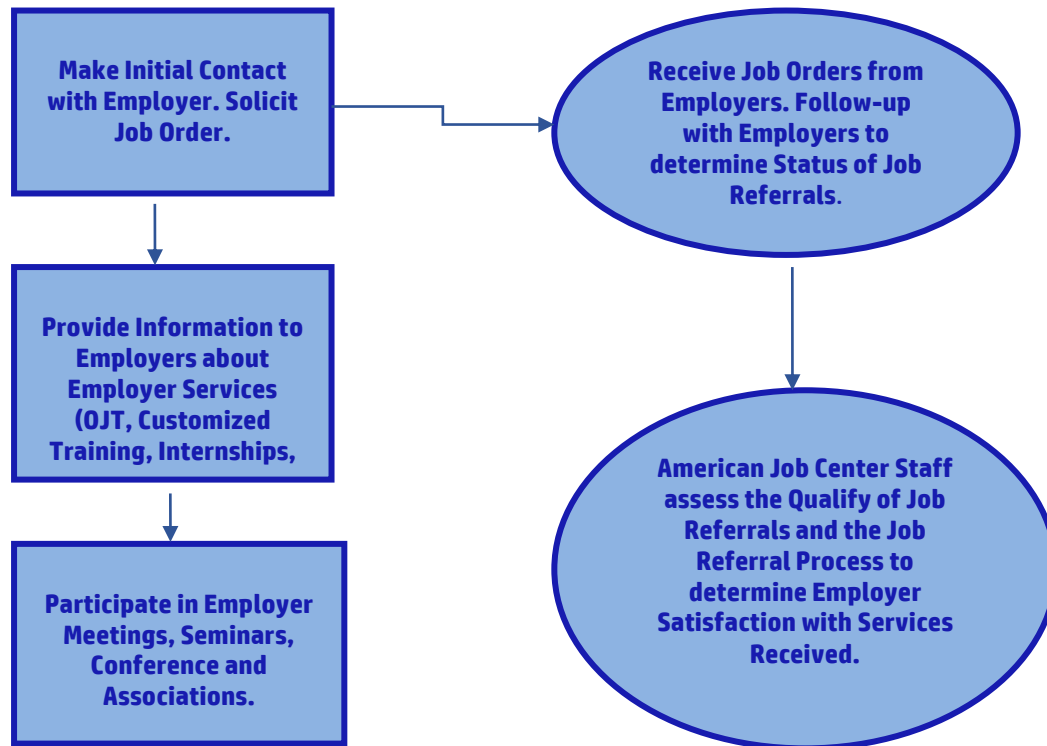
2. To Support a Local Workforce Development System that meets the Needs of Businesses.

The NPWDB, Inc. values businesses as key customers in the local workforce development system and works to serve them effectively and efficiently through many business-driven programs. Employers need access to qualified individuals and assistance with recruitment, retention and upgrading skills of their existing workforce. The NPWDB, Inc. and members of its Business Services Team (BST) and Business Resource Network (BRN) work to customize services for employers in an effort to meet their demands at any given time. Career Pathways Services developed for job seekers are employer-driven and consist of required skills and credentials needed for "high demand" occupations.

The NPWDB, Inc. facilitates employer connections to qualified, potential hires. The NPWDB, Inc. increases public awareness among the business community of American Job Center, Core and Required Partners' Programs and Services to employers. Job readiness services, including but not limited to: Career counseling; Workshops; and, Assessment are provided to potential hires. Access to American Job Center job seeker pools, recruitment and job matching provide employers with the ability to reach a new set of qualified individuals at a cost savings. Core Partners, like Adult Education (AE) and the West Virginia Division of Rehabilitation Services (WVDRS), provide services that assist job seekers, including those with disabilities, with job development and placement efforts that meet employer needs. Collaboration among Partners aims to increase awareness among employers about resources and services available through the local workforce development system. After engaging employers and discussing their workforce needs, the NPWDB, Inc., Core and Required Partners provide appropriate solutions that involve the coordination and delivery of work-based training programs and services, like the On-

the-Job (OJT) Program, Customized Training Program and Incumbent Worker Training Program, to name a few. Our goals are three-fold: 1) To improve an employer's workforce by tapping into our pool of talented job seekers; 2) To decrease hiring/screening costs; and, 3) To increase the retention of workers.

Flow Chart for Employer Services



3. To Better coordinate Workforce Development Programs and Economic Development Partners and Programs.

Partnerships with local economic development groups are well-developed and include frequent interactions. The NPWDB, Inc. works closely with these groups at the city and county levels. The NPWDB, Inc. maintains strong linkages with regional economic development groups in the region like, the Regional Economic Development Services (REDS), the Hancock-Brooke Business Development Corporation and the Wetzel and Tyler Counties Economic Development Group. A member of the REDs serves on the Board of Directors and provides valuable insight of the economic climate in the region. Collaboration with these groups ensures economic development partners are well-informed of the capability of the local workforce development system with regard to providing employer services, like, On-The-Job (OJT), Customized Training and Incumbent Worker Training, and can, in turn, help us effectively market them to the business community. NPWDB, Inc. Staff is regularly invited to participate in meetings with area employers at the request of our economic development partners and the West Virginia Development Office. Employer services and workforce and training issues are discussed during these meetings.

4. To Strengthen Linkages between the American Job Center Delivery System and Unemployment Insurance Programs.

Information about Unemployment Insurance (UI) Programs is available at American Job Centers. The UI Program uses a number of strategies to align and integrate programs and services at American Job Centers, like: Information about all programs and initiatives are presented by UI Program Staff during UI workshops; Referrals are made from one Core and/or Required Partner to another; and, Follow-up on participant referrals outcomes are shared among Partners. The NPWDB, Inc. conducts targeted outreach efforts throughout the program year to ensure UI recipients are aware of training programs and services available at American Job Centers.

E) A Description regarding the Implementation of Apprenticeship, Incumbent Worker Training Programs, On-The-Job Training Programs, Customized Training Programs, Industry and Sector Strategies, Integrated Education and Training, Career Pathways Initiatives, Utilization of effective Business Intermediaries and other Business Services and Strategies, designed to meet the needs of Businesses in support of the Strategy described in Section I;

Apprenticeships are industry-driven models that combine on-the-job learning with job related instruction as an “earn and learn” model. Apprentices are employed and earn wages from the first day on-the-job. According to Apprenticeship USA, there are currently more than one thousand (1,000) occupations, including careers in welding, transportation and energy in which Apprenticeships are used to meet business needs for qualified workers. Using Apprenticeships as work strategies contribute to higher performance outcomes in employment, retention, earnings and credential attainment. Beginning in 2018, the NPWDB, Inc. has worked to ensure Workforce Innovation & Opportunity Act (WIOA) funding is directed towards the development of Apprenticeships because we recognize that Apprenticeships are extremely effective experiences that allow individuals gain hands-on experience in building the skills that employers required. To date, the NPWDB, Inc. has funded about one hundred seventy-five (175) individuals who are enrolled in the following Apprenticeship Programs: Roofers; Sheet Metal; Ironworkers; Bricklayers; Laborers; Painters; Plumbers/Pipefitters; Carpenters; The Cities of Weirton and Wheeling Firefighters; Electricians; and, Insulators Heating & Frost. Along with the rise of new industries in the region comes a need to properly educate and train individuals seeking employment within these industries. In late 2019, WVNCC announced it was opening a new Industrial Training Center in Weirton, Hancock County. Plans are to begin offering welding programs at the new Center starting in mid-2022. The goal is to create comprehensive workforce training programs out of the Center to ensure “high demand” jobs can be filled locally. The Center will have twenty (20) workstations and provide full academic opportunities, including one (1) and two (2) year certification and degree programs as well as short-term training. Additional training programs for other skills will be developed in the future. WVNCC has similar training facilities on their Wheeling and New Martinsville campuses. The NPWDB, Inc. supports the development of Apprenticeships in non-traditional industries.

Incumbent Worker Training is designed to meet the special requirements of an employer or a group of employers in “high demand” industries to retain skilled workers or avert the need to lay off employees by assisting workers in obtaining the skills

necessary to retain employment. Incumbent Worker Training is conducted with a commitment by the employer to regain or avert lay-offs of the workers trained.³ The number of participants an employer(s) plans to train or retrain has to be no less than twenty-five (25). Incumbent Worker Training funding is only considered for employers located in the region. The training period can last no more than fifteen (15) days. Incumbent Worker Training may be used for upskilling apprentices who already have established working/training relationships with the Registered Apprenticeship Program. The participating employer(s) is required to pay the non-federal share of the costs of providing training to their Incumbent Workers in accordance with a sliding reimbursement scale. The amount of reimbursable hours to a participating employer(s) will depend on the total number of existing employees the employer has.

The NPWDB, Inc. engages area employers from “high demand” industry sectors to participate in its On-the-Job (OJT) program. ⁴ OJT opportunities benefit employers by helping them meet their hiring and skill needs. Occupational training is provided by an employer to an OJT participant in exchange for reimbursement to cover the extraordinary cost of providing training and supervision related to the training. OJT reimbursement is limited in duration depending on the occupation the new hire is being trained for, but will not, in any circumstance, exceed six (6) months or one thousand forty (1,040) hours. Employer reimbursement occurs in accordance with the region’s reimbursement sliding scale. The amount of reimbursable hours to a participating employer will depend on the total number of existing employees the employer has. An OJT contractual agreement can be written with a Registered Apprenticeship Program or a participating employer in a Registered Apprenticeship Program for the OJT portion of the Registered Apprenticeship Program.

Depending on the length of the Registered Apprenticeships and available funding, WIOA funds may cover some or all of the Registered Apprenticeship Training. Through participation on the OJT program, an employer may be eligible for the Earned Income Tax Credit.

Customized Training will be offered to an employer or group of employers to introduce workers or potential workers, including those with disabilities: To new technologies or new production or services procedures; To upgrading employee skills for new jobs; or, for other appropriate workforce development purposes in accordance with the WIOA. Customized Training contracts will be limited to the period of time required for an individual to reach a competency level required in the occupation for which the individual is being trained. However, under no circumstances will Customized Training exceed thirty (30) days. Customized Training may be offered to no less than a total of ten (10) eligible participants. The employer pays for no less than fifty percent (50%) of total training costs. These services are provided to an employer or a group of employers when: Employees are not earning a self-sufficient wage; The training is designed to meet the special requirements of an employer or group of employers; When there is a commitment by the employer(s) to employ individuals upon successful completion of the training; If the employer(s) pays for a significant cost of training of total training costs; or, If the employer(s) is not delinquent in unemployment insurance or worker’s compensation tax, penalties or interest. Through participation in Customized Training, an employer may be eligible for the Earned Income Tax Credit. In order to advance efforts of creating industry sector initiatives in the region, the NPWDB,

Inc., Core and Required Partners will use focus groups, business panels and surveys to identify desired skills and to solicit input into programming. We need to work to develop solutions around the hiring needs of employers while focusing on the hard-to-fill jobs that struggle with retention. We will regularly communicate with employers to better understand their challenges and needs. We will bring together education and Training Providers to assess existing training options. Our goal is to determine if the types of training being provided are relevant to the skills needed in the workplace. We need to design and implement practices that engage industry sectors and use economic and labor market information to develop industry and sector strategies. The NPWDB, Inc. will have a renewed focus on Work-Based Learning.

Integrated education and training may be offered by a Core Partner, like Adult Education (AE), or in partnership with other Core Programs. Regardless, we will need to rely on employer input through sector partnerships to ensure that integrated Education and Training Programs are aligned with area employers' skill needs. Integrated education and training may include: Basic skills upgrading; Occupational Skills Training; and, Supportive Services that will help individuals earn certifications in "high demand" occupations. Career Pathways will align education, training, employment and Supportive Services, as well as core academic, technical and employability skills that are needed by Adults and Youth, especially those with general workforce preparation and training for a specific "high demand" occupation. The NPWDB, Inc. may include education offered concurrently with and in the same context as continue to work to increase partnerships with area employers to better serve their needs through cooperative strategies with Core and Required Partners. In partnership with AE and Career & Technical Education Programs, the NPWDB, Inc. can integrate technical training and basic skills education that will lead to industry-recognized credentials and opportunities to continue on a career pathway. Job Center Operator, Core and Required Partners will work to develop or expand Work Experiences, Internships and employment opportunities for Adults and Youth, especially those with barriers to employment. In addition to providing Individual Training Accounts (ITAs), the NPWDB, Inc. will also strive to provide OJT Training and Work-Based Learning opportunities and/or blend OJT Training and Internships with ITAs. Under the guidance of AE, Core and Required Partners will implement Career Pathways initiatives and identify opportunities to expand access to existing Career Pathways as well as unmet skill needs of employers that may be addressed through the development of new Career Pathways programs or modification of existing Career Pathways. The delivery of Career Pathways will be diverse depending if an individual is low-skilled with multiple barriers to employment or not. Career Pathways prepare individuals to be successful in any of a full range of secondary or post-secondary education options including apprenticeships. Career Pathways will incorporate sector strategy principles by engaging employers to increase relevance and labor market value of participant skills and credentials which in turn improve a participant's employment prospects. The NPWDB, Inc. will cohesively combine public-private partnerships, resources and funding, policies, data and shared performance measures to successfully develop high quality, sustainable Career Pathways.

Business services representatives, along with Job Center Operator, Core and Required Partner and Higher Education Staff and representatives from the economic development sector serve as members of the Business Services Team (BST) in an effort to

strengthen relations with employers to learn of their workforce needs and to provide them with access to a talent pipeline, especially for industry sectors experiencing a shortage of talent. The BST supports sector business strategies by serving as a business intermediary between Core and Required Partners and area employers within targeted "high demand" sectors. This arrangement allows us to leverage our resources to the greatest extent possible and provide a more robust menu of Work-Based Learning opportunities to area businesses. The BST conducts informational session where businesses can learn of grants, tax credits and other services available to them to help them become more competitive. The NPWDB, Inc. collaborates with other business intermediaries, like, local Chambers of Commerce, business development groups and area staffing service agencies. Job Center Operator Staff will assist these groups when they can offer access to quality employment opportunities to our customers and when they are working with businesses that have good temp-to-hire ratios. Working relationships with business intermediaries will be evaluated in terms of employee wages and retention. The NPWDB, Inc.'s goal is to streamline local workforce development efforts while always addressing employers' needs.

F) A Description of how the Local Board will coordinate Workforce Development Activities carried out in the Local Area with Economic Development Activities carried out in the Local Area in which the Local Area, or Planning Region, is located and promote Entrepreneurial Skills Training and Microenterprise Services;

One of the Board of Directors priorities is to link local workforce development activities with economic development strategies. Economic Development and Business Representatives serve on the Board of Directors and on the Business Services Team (BST) at American Job Centers. To ensure the local workforce development system is meeting the needs of employers, the NPWDB, Inc. needs to leverage resources, share information, coordinate outreach efforts and co-host business events on a regular and ongoing basis. By understanding the needs of employers, the local workforce development system can better prepare individuals to acquire the skills they need to satisfy employer recruitment requirements.

The NPWDB, Inc. recognizes and supports entrepreneurship as a viable opportunity for job seekers, especially those with barriers to employment. If a job seeker indicates an interest in starting a small business, the job seeker will be directed to the West Virginia Small Business Development Center located on the campus of West Virginia Northern Community College (WVNCC), a Core Partner, in Wheeling for information and guidance. Small businesses are the cornerstone of economic growth in the region. With assistance from a business coach, a job seeker can receive expert coaching and needed services at every stage, including market identification, business plan development, financial statement preparation and analysis, case flow preparation and analysis and identification of funding sources. In 2013, West Liberty University in partnership with the Wheeling Academy of Law and Science, established a business incubator in the City of Wheeling in an effort to create economic growth and encourage businesses to mature and remain in the region. The incubator assists with technology and office needs, business planning, identifying funding sources and locating clients. Microenterprise services are closely related to entrepreneurial services and may include training in

business skills and best practices, tax and financial planning and credit building. Entrepreneurs and microenterprise services generally begin with only a couple of individuals. The NPWDB, Inc. will seek to work with local government, WVNCC and/or a local non-profit where individuals can share office space common areas, reception duties and other services as they seek to grow their business. The BST will work closely with small businesses and microenterprises to support the growth and development of the workforce including offering entrepreneurial and microenterprise workshops. The Board of Directors strongly supports small Veteran-owned businesses.

G) A Description of how the Local Board will leverage and coordinate Supportive Services in the Delivery of Workforce Development Activities carried out in the Local Area. Specifically, the Local Plan should address how the Local Board will work with Local Management Boards and other Providers to deliver Supportive Services to Job Seekers;

The NPWDB, Inc. recognizes the need and value of Supportive Services in helping economically disadvantaged customers, including Youth, overcome barriers and successfully complete training and/or enter family-sustaining employment. The NPWDB, Inc., and the network of Core and Required Partners and Training Providers ensures appropriate and necessary Supportive Services are made available to assist Adults, Dislocated Workers and Youth. The NPWDB, Inc. and all Partners are aware of the region's Supportive Service Policy and vice versa through cross-training efforts and ongoing communications. It is the responsibility of Job Center Operator, Core and Required Partner and Training Provider Staff to inform job seekers of what types of Supportive Services are available to them upon arrival at American Job Centers. Supportive Services are made available to eligible individuals during their participation in any Workforce Innovation & Opportunity Act (WIOA) funded training activity. In order for Supportive Services to be paid with WIOA funds, documentation is maintained showing that a referral for like services was first made to access other outside, potential funding sources and no other means of outside funding were either available or suitable, so it was necessary to use WIOA funds. Documentation about the availability of Supportive Services in the area, as well as referrals made to a training activity, are maintained in participant files. Supportive Services include, but are not limited to:

H) A Description of how the Local Board intends to provide a great Business Voice in the Delivery of Workforce Development Activities carried out in the Local Area. The Description should include how the Local Board will engage Businesses on Decisions regarding the Type and Context of Training Activities;

The Board of Directors oversees and sets priorities for training in the region. In order to implement a strong "demand-driven" approach to training development, the Board of Directors uses sector-based training as a way to determine skills and occupational training needs of "high demand" industries. Educational and training institutions are asked to initiate alignment of curriculum with industry-related skills certification requirements. More partnerships are being developed with employers in specific "high demand" industries so they can provide input on skill levels required, including soft skills. Then, based on this input, educational and training institutions can develop and

implement a number of industry-related skills certifications into its regular curriculum. Educational institutions will most likely be at different levels of readiness with regard to implementing industry-related skills certifications. There are more vocational skills training opportunities being provided in the region. However, there is a need for more individualized training programs to address the skill development/advancement of Incumbent Workers. The Career and Technical Education system works to meet the needs of employers, education and training institutions, students and workers seeking to acquire education and training credentials that are both portable and stackable. The NPWDB, Inc. continues to forge stronger partnerships with the local educational and training community and area employers so we can continue to fund successful and relevant training programs for job seekers. Success depends on our ability to encourage key stakeholders to get involved.

I) A Description of how the Local Board will promote and cultivate Industry -Led Partnerships in the Delivery of Workforce Training Opportunities;

Industry-led partnerships are coupled with Career Pathways Services and play an integral part of the Board of Director's strategic plan for the region. The local workforce development system allows customers to receive Career Pathway Services at any stage. Industry-led partnerships inform and drive the delivery of Career Pathways and affect decision-making regarding types of training and skills offered in the region. Industry-led partnerships are developed as a means to connect with the regional economic outlook at any given time. The needs of industry are tied to workforce projects that include training, recruitment industry-sector partnerships, Career Pathways development and enhancement of training options. The NPWDB, Inc. continues to meet with key business organizations in the region, like, local Chambers of Commerce, business groups and associations and economic development entities in an effort to engage or increase collaboration with industry sectors. Making up-to-date labor market data accessible assist post-secondary education and training programs to better align with labor market demand and allow them to more quickly adapt to changes in the labor market. The NPWDB, Inc. works to improve job seeker and employer matching because the needs of employers sometimes are disconnected from the qualifications of job seekers. Employers continue to struggle to find the talent they need and jobs seekers cannot find the jobs they want. So, we'll continue to make available training programs and services that match needed skills with available jobs.

J) A Description of the Role, if any, of Local Faith or Community-Based Organizations in the Local Workforce Development System.

The NPWDB, Inc. recognizes faith and community-based organizations provide essential resources and services our customers can take tap into. Some examples of faith and community-based organizations customers can be referred to include: CHANGE, Inc. which provides transportation, housing assistance and weatherization to low income individuals, Supportive Services to Veterans and a summer food program for Youth; Catholic Community Charities which provides food assistance, child care assistance, free work attire and mentoring services to needy Adults and Youth; The YWCA which provides free work attire to economically disadvantaged women; and, The Greater Wheeling Coalition for the Homeless which provides housing assistance and other

needed Supportive Services to homeless individuals. In turn, faith and community-based organizations regularly refer their clients to regional American Job Centers for employment and training opportunities. Representatives of faith and community-based organizations participate in regular Job Center Operator and Partner meetings and cross-training sessions at American Job Centers. Upon request, faith and community-based organizations are able to be placed on the NPWDB, Inc.'s Request for Proposals (RFPs) mailing list. NPWDB, Inc. Staff serves as board members on some of the faith and community-based organizations in the area.



1 In accordance with the WIOA, WorkForce West Virginia will be physically co-located in no less than one (1) American Job Center in the region. In our region, Wagner-Peyser Services are co-located at two (2) American Job Centers in the region.

2 The Governor of West Virginia has exempt WVDHHR from contributing to the sustainment of regional American Job Centers. Subsequently, WVDHHR Staff is not required to physically be located at American Job Centers. In our region, they are not.

3 An Incumbent Worker under WIOA needs to be employed, meet the Fair Labor Standard Act requirements for an employer & employee relationship and have an established employment history with the employer for at least six (6) months or more.

4 OJT services will be provided through contractual agreements with employers in public, private non-profit or private sectors. An OJT Contract can be written with an employer in the public or private non-profit sector only when there are no less than ten (10) active OJT Contracts in place in the region with private-for-profit employers.

SECTION 3: AMERICAN JOB CENTER DELIVERY SYSTEM

A) List the American Job Centers in your Local Area, including Addresses and Phone Numbers. Indicate the One Stop Operator for each Site and whether it is a Comprehensive or Satellite Center;

Eligible individuals, especially those with barriers to employment, are provided with the opportunity to actively participate in American Job Center activities, programs and services, as needed. Assistive technology is made available to meet the anticipated wide range of customer needs. If necessary, unique and individualized services are made available to eligible individuals. In an effort to make American Job Center services as accessible as possible for individuals, the NPWDB, Inc. has two (2) comprehensive, full-service American Job Centers and one (1) affiliate American Job Center in the region:

Wheeling American Job Center (Comprehensive Site) 1
1275 Warwood Avenue
Wheeling, WV
Ohio County
304-232-6280

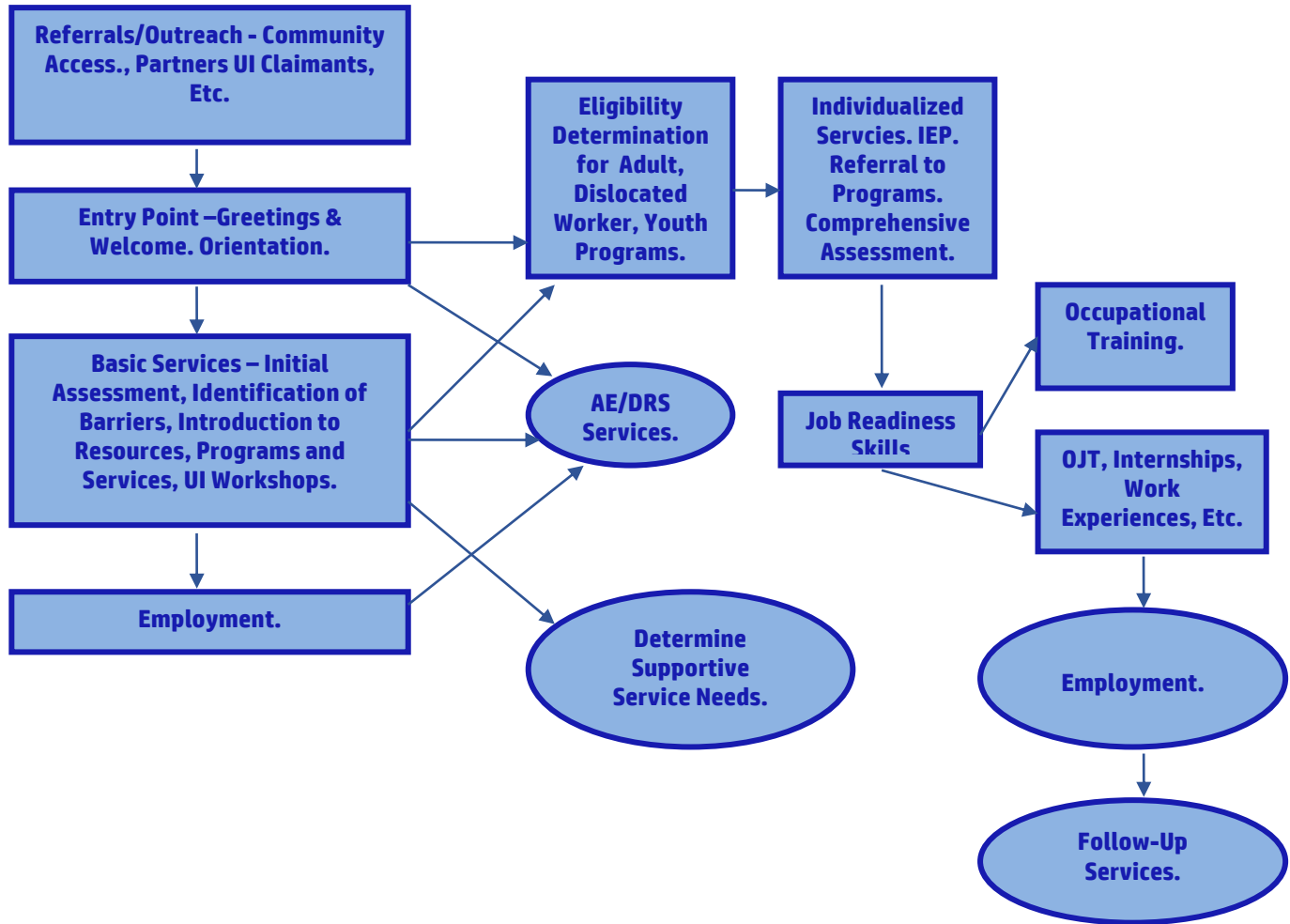
Weirton American Job Center (Comprehensive Site)
WV State Building Complex
200 Municipal Plaza
Suite 350
Weirton, WV
Brooke County
304-723-5337

American Job Center (Affiliate Site)
141 Main Street
Room 108
New Martinsville, WV
Wetzel County
304-455-6184

Selection of American Job Center sites were based on the following criteria: ADA accessibility (handicap accessibility), easy access, spacious rooms/offices, available public transportation, ample free parking and for customer convenience/accessibility reasons, to name a few. American Job Center sites offer inviting environments to job seekers and employers.

B) Customer Flow System to describe the Customer Flow Process used in the Local Area. This Description should include Eligibility, Assessment, Individual Training Plans and Case Management;

Flow Chart for Customers



The local workforce development system continually strives to expand access to employment, training and educational opportunities and Supportive Services for eligible individuals. An American Job Center system is in place that is committed to first addressing the needs of individual customers, then, specialize services depending on need. There is no wrong door to enter the local workforce development system. In fact, there are multiple entry points to services at American Job Centers. Examples are: Participant orientation sessions or re-employment workshops; Core and Required Partner services; and, Eligibility assessment sessions. At workshops, customers learn about basic career, training services and labor market data information.

Collaboration and coordination between Job Center Operator, Core and Required Partner Staff allows us to leverage all available resources while creating a facility capable of "universal" service delivery to job seekers and employers. Customers can freely access American Job Center Programs and Services, like: Youth Workforce Investment Activities; Adult and Dislocated Worker Employment/Training Activities; Wagner-Peyser Act Employment Services; Rehabilitation Act Programs and Services; Adult Education and Literacy Activities; and, Apprenticeship Programs. All American Job Centers are ADA compliant.

Entering a facility as “universal” as an American Job Center can be somewhat disorienting and overwhelming to a customer, whether that customer is the president of a large corporation or a long-time welfare recipient looking to re-enter the workforce. The challenge facing Job Center Operator Staff is to make the experience of entering an American Job Center less intimidating. Job Center Operator Staff is committed to providing quality customer service. Upon entering an American Job Center, customers always have the choice of staff assistance, the degree of engagement, as well as the pace of how they intend to use services. Because there is no sequence of services, the customer is given the ability to choose self-paced, self-selected workshops and services but also have Job Center Operator Staff available at their disposal who are ready to assist them directly and in the manner that best suits their needs. The option to discuss individualized services is always available through customer determination or staff assessment.

Each American Job Center designates a “Greeter” who is responsible for welcoming customers. Greeters are trained and knowledgeable in American Job Center Programs and Services. Customers entering an American Job Center are served promptly, comprehensively, efficiently and professionally by a Greeter. The Greeter asks each job seeker or employer customer to “sign-in” in the Reception Area. Customers are then asked if he/she would like to be given a guided tour of the facility. Appropriate signage is on display at each American Job Center showing the layout of the facility. Depending on the needs of the job seeker, the Greeter may direct a new customer directly to the Resource Room where he/she can immediately begin to conduct an active job search and explore current job opportunities. Repeat customers are able to direct themselves to the appropriate area and begin working independently. After initial contact with a Greeter has been made, customers are referred to Job Center Operator Staff who is responsible for processing and interviewing customers. Job Center Operator Staff can offer resume writing or resume writing assistance to customers, if requested. Job Center Operator Staff orientates job seekers on career and training services available. Orientation sessions fall into two (2) broad categories: Orientation to American Job Center Programs and Services; and, Orientation to a specific career service and training program. Orientation sessions are provided on an individual or group basis. Job Center Operator, Core and Required Partner Staff determine the content of the orientation session. However, at the very least, orientation sessions will include review of the following information: Education/Training Opportunities; Career/Employment Opportunities; Career Pathways Services and Planning; Available Supportive Services; Labor Market Data; Types of Career Counseling available; Eligibility/Work Registration; Placement Assistance; Referral to Jobs/Job Search Assistance; Information on Basic/Job Skills Training; Post-Employment and Follow-up Services; High School Equivalency Test (HiSet); Employability Skills (Job Preparation); and, Assistance in accessing Financial Aid for Training/Education.

A list of approved, eligible Training Providers is given to job seekers. Flyers are also distributed to customers that detail they can go to the Social Security website to set up an account and monitor their earnings and future social security benefits once training has been completed and a job secured. By informing job seekers of all services available, Job Center Operator staff upholds the principle of “customer choice.” In short, orientation sessions stress four (4) major points: 1) Benefits and advantages of working; 2) Personal responsibility; 3) Types of assistance for Workforce Innovation &

Opportunity Act (WIOA) eligible customers; and, 4) Career and training services. The orientation process is intended to be an all-inclusive informational session that facilitates informed customer choice. Orientation sessions include an overview of customers' rights and responsibilities.

Sessions emphasize a seamless continuum of career and training services, providing important information to customers that allow them to make informed choices about which services are most appropriate and effective for them to seek. The ability of a customer to choose a realistic course toward training and/or employment requires significant assistance from Job Center Operator Staff. The most important consideration when selecting a training program is a simple question: Will the training increase my chances of obtaining employment once the training is completed? The more "high demand" a skill is, the easier it will be to obtain employment after training in that particular skill is completed. One of the goals of the Job Center Operator Staff is to ensure that all customers are empowered to choose their future careers to the greatest extent possible. If warranted, a preliminary determination of eligibility may be made. 2 This process includes a one-on-one interview with Job Center Operator Staff. Subsequently, Job Center Operator Staff will guide the customer in making an informed choice about what Programs and Services he/she will seek. Job Center Operator Staff remains associated with customers until he/she has concluded all activities associated with an American Job Center. Job Center Operator Staff will then refer job seekers to a Customer Career Planner/Data Control Coordinator to determine final program eligibility. Customer Career Planner/Data Control Coordinators will determine eligibility of the customer for enrollment into a WIOA funded program or service. Customer Career Planner/Data Control Coordinators will detail the documents the customer needs to provide in order to demonstrate eligibility. Eligibility determination for Adults, Dislocated Workers and Youth will be determined based on self-sufficiency standards for program eligibility. Individuals wishing to receive Employment and Training Services funded through Adult and Dislocated Worker Programs must meet all of the following requirements: Be legally authorized to work in the United States; Be eighteen (18) years of age or older; and Be properly registered for the Selective Service. Priority for Career and Training Services funded by and provided through the Adult program will be given to recipients of public assistance, other low income individuals and individuals who are basic skills deficient for receipt of Career Pathways Services determined appropriate to obtain or retain employment. Additional eligibility requirements for Dislocated Workers include: Has been terminated or laid off or has received a notice of termination or layoff from employment; AND, Is eligible for or has exhausted entitlement to Unemployment Compensation; OR, Has been employed for a duration sufficient to demonstrate attachment to the workforce but is not eligible for Unemployment Compensation due to insufficient earnings or having performed services for an employer that were not covered under a State Unemployment Compensation Law; AND, Is unlikely to return to a previous industry or occupation.

If a customer expresses an interest or need for individualized services or if a Customer Career Planner/Data Control Coordinator determines individualized services are the right approach after interaction with the customer, the customer will receive a staff-assist assessment to review their educational background, employment status, service needs, barriers to employment, what types of career services should be provided and level of Literacy. Appropriate referrals to Core and Required Partners will be

determined as needed in an effort to remove barriers or for additional support. Customers will be informed of the total range of career and training services available and will be provided with the opportunity to choose which services best meet their needs and goals. ³

Once the WIOA application process is completed and appropriate documents collected, the Customer Career Planner/Data Control Coordinator will initiate a more intensive assessment and review process of the customers' needs and suitability for individualized services, including but not limited to training. The Customer Career Planner/Data Control Coordinator and the customer will develop an initial Individual Employment Plan (IEP) or an Individualized Service Strategy Plan (ISS) to identify customized employment goals and achievement objectives. Planning around labor market data and industry demand is integrated to ensure appropriate employment goals are set. The IEP or ISS is reviewed and updated regularly. Customer Career Planner/Data Control Coordinators will provide case management services to customers enrolled in a WIOA program or service. Case management services include: Assessment of a customer's skills, interests and abilities; IEP development with periodic reviews and updates; Regular contact with the customer to discuss goals; Job search activities; and, Training progress, if applicable. File documentation of all WIOA funded services, including training approval, Supportive Services, employment outcomes and follow-up services for the customer will be maintained by Customer Career Planner/Data Control Coordinators.⁴

Recognizing employer customers are the link between job seekers and the opportunity for employment. Job Center Operator Staff emphasize the importance of serving employers in a professional and timely manner. Job Center Operator Staff continually works on developing and maintaining relationships with area employers in an effort to identify a wide array of job opportunities for customers, especially those with barriers to employment. Ongoing contact with area employers allows Job Center Operator Staff to identify job "leads" and "fields" of career opportunity that help customers increase their chances for successful job placement. Partnerships with employers allow Job Center Operator Staff to make recommendations to customers based on discussions with those employers about skills that are in "high demand." Job Center Operator Staff makes regular onsite visits to employers.

American Job Center marketing activities are coordinated in concert with marketing initiatives by its Core and Required Partners. Job Center Operator Staff understands the importance and need for a diverse and multi-faceted marketing and outreach plan in order to secure continued success for its American Job Center system. Job Center Operator Staff is committed to continually improving quality of services. A calendar of events that include newsletters, job search seminars, job fairs, guest speakers and informational session about training programs are advertised on the NPWDB, Inc.'s website – npworkforcewv.org. Additionally, American job Centers use a multitude of social media outlets to outreach and communicate to the public about American Job Center events. Sound communication networks in place for job seekers and employers include newsletters, follow-up cards, telephone calls, use of peer mentors during critical junctures of the customer's progress, customer surveys, customer suggestion boxes and customer recognition programs.

C) Describe how the Local Board will ensure Meaningful Access to all Customers;

The NPWDB, Inc. remains committed to ensuring customers, especially those with barriers to employment, have meaningful physical and programmatic access to services. When individuals enter an American Job Center, they are thoroughly vetted to determine the delivery of services that would be most meaningful for them. Job Center Operator Staff is able to accurately identify a customer's needs then ensure the prompt delivery of appropriate services. Job Center Operator Staff are aware of all available Supportive Services and how customers can access them. Core and Required Partners, like the West Virginia Division of Rehabilitation Services (WVDRS), have assisted the NPWDB, Inc. in the setup and design of American Job Centers in an effort to enhance the delivery of services to customers, especially those with disabilities. Adult Education (AE) is available to assist customers with limited English proficiency and Literacy skills. If necessary, Job Center Operator Staff approach other organization's sites like: Homeless shelters; Halfway houses; and, Juvenile facilities so they can offer services.

D) A Description on the Process the Local Board intends to provide for the Solicitation and Selection of a One Stop Operator as identified in Section 107 of the WIOA;

The Board of Directors, in conjunction with Local Elected Officials (LEOs), identify a One Stop Operator(s) through an open and competitive procurement process in accordance with the Uniform Administrative Guidance at Chapter II of 2 CFR (in particular 2 CFR 200.318 through 200.326. Public notice of the search for a One Stop Operator(s) is advertised for at least thirty (30) days in media where prospective local, State, and national bidders typically identify such opportunities (ie: print newspapers, on-line newspapers, the NPWDB, Inc.'s website and other community websites). The One Stop Operator(s) is selected via a Request for Proposal (RFP) process. RFPs are solicited for a One Stop Operator every four (4) program years. It is the responsibility of the One Stop Operator(s) to effectively coordinate the service delivery of Core and Required Partners and Service Providers at all three (3) regional American Job Centers. Some of the information requested in the RFP include: Types, variety and coordination of services to be provided to customers at American Job Centers, specifically those with barriers to employment; Methods for referral of individuals between American Job Centers and Core and Required Partners for appropriate services and activities; Proposed budget; and, Performance strategies. The One Stop Committee, which consists of board members, is tasked with reviewing and evaluating RFPs received. The One Stop Committee recommends a One Stop Operator(s) to the Board of Directors and LEOs, who have final approval on the selection of a One Stop Operator(s) for regional American Job Centers. The One Stop Operator(s) can be a single entity or a consortium of entities. Types of entities that may be a One Stop Operator include: An institution of higher education; A State Employment Service agency established under the Wagner-Peyser Act; A community based organization, nonprofit organization, or workforce intermediary; A private for-profit entity; A government agency; A local Board, with the approval of the Chief Elected Official and the Governor of West Virginia; An interested organization or entity capable of carrying out the duties of One Stop Operator; Local Chamber of Commerce; Business organization; or, Labor organization. If the consortium of entities is a consortium of One Stop Partners, it must include no less than

three (3) One Stop Partners. Local Workforce Development Boards, like the NPWDB, Inc., are also permitted to serve as the region's One Stop Operator. The NPWDB, Inc. has served as the One Stop Operator of regional American Job Centers since Program Year 2006. If the NPWDB, Inc. bids on providing One Stop Operator Services in 2021, an outside 3rd party will be solicited in accordance with State and WIOA policy to prepare, review and evaluate the RFP. The outside 3rd party will be responsible for recommending a One Stop Operator(s) to the One Stop Committee. The NPWDB, Inc. will adhere to federal, WFWV Policy 4-17 and Local NPWDB, Inc. Policy #71 in selecting a One Stop Operator(s) (Attachment I).

E) A Description of how the Local Board will ensure the Continuous Improvement of Eligible Providers of Services through the System and ensure that such Providers meet the Employment Needs of local Businesses and Workers and Job Seekers;

The NPWDB, Inc. works diligently to ensure the quality and continuous improvement of eligible providers, including contracted providers. The One Stop Committee, comprised of board members, meets to discuss strategies for continuous improvement of the local workforce development system, including opportunities for cross-training and collaboration across Core and Required Partner programs. The selection of providers is based on: Past performance, Projected cost; and, Assurance that deliverables are in line with the need of employers. RFPs are publicly advertised on the NPWDB, Inc.'s website and in local print media. The One Stop Committee is responsible for reviewing and evaluating RFPs using a Program Evaluation Form/Rater Scoring System. Rating scores are then totaled and averaged among Staff and Sub-Committee members who reviewed them. The One Stop Committee then makes a recommendation(s) to the Board of Directors. The Board of Directors and Local Elected Officials (LEOs) are responsible for approving all awards/contracts to Provider(s).⁵ The NPWDB, Inc. stays apprised of employment trends and projected employment opportunities in the area when determining funding awards to Providers. The NPWDB, Inc. draws on the experience of Core and Required Partners to assist in the update and improvement of Providers so that the employment needs of employers and job seekers are being met. Job Center Operator Staff collects customer satisfaction data at regional American Job Centers. Results of customer feedback are used to improve existing programs or develop new ones. Through a comprehensive monitoring process, the NPWDB, Inc. is able to measure performance levels of Providers. The monitoring process can provide "warning signals" that a deficiency or problem may be developing so that improvement measures or corrective action can be taken swiftly. Monitoring of Providers occurs no less than two (2) times a program year. The monitoring process also allows the NPWDB, Inc. to ensure Providers are: Meeting the needs of area employers by verifying customers went to appropriate placements, whether it be in jobs or training programs; and, Ensuring that the best possible matches between customers and employment or training opportunities have occurred. Failure of a Provider to meet performance measures will be considered a valid reason to remove that Provider from the Eligible Training Provider List (ETPL) or to discontinue contract funding.

F) A Description of how the Local Board will facilitate access to Service Providers through the American Job Center Delivery System, including in Remote Areas, through the use of Technology and through other

Means;

A key priority for the NPWDB, Inc. is to ensure job seekers and employers have access to the wide array of education training and support services offered at regional American Job Centers. Our focus is to provide programs and services to those most in need and hard-to-serve. The NPWDB, Inc. provides the highest quality of programs and services to job seekers and employers through the use of strategically located American Job Centers, technology and partnerships with Core and Required Partners and Providers. The NPWDB, Inc. continually builds on existing technology present at American Job Centers, along with implementing new technology, in an effort to provide a more integrated delivery of intake and case management information to individuals with barriers to employment. In an effort to reach those living in remote areas in the region, the NPWDB, Inc. has to rely on social media outlets to convey information about American Job Center programs and services. Using technology like web access addresses resources for customers who cannot physically access American Job Centers. The NPWDB, Inc. is encouraging Core and Required Partners to develop a link on website home pages that direct customers to American Job Center Programs and Services. The NPWDB, Inc. provides information and instructional activities to area libraries, housing authorities, etc. for display and distribution to individuals who are physically unable to access American Job Centers. Additionally, the NPWDB, Inc., Core and Required Partners continue to explore ways to leverage new technology in an effort to increase our ability to better serve job seekers and employers who cannot physically get to a regional American Job Center to access Programs and Services.

Our ultimate goal is to have job seekers be able to scan services and for employers to be able to apply for employer services by simply using the internet. Under the direction and guidance of the WorkForce West Virginia Office, the NPWDB, Inc. would like to eventually implement an electronic registration system that will enable job seekers to enroll with American Job Centers simply by accessing the internet. This electronic registration system may also help facilitate participant referrals to available jobs. Employers would be able to track referrals and communicate any progress made with new hires. Job seekers would also be able to sign up and register for American Job Center Programs and Services from any Core or Required Partner Office. Youth could complete applications for participation in work experience programs and be able to upload associated documents and forms. The NPWDB, Inc. will take the lead in developing partnerships with interested stakeholders in the region that serve Adults and Youth. We will reach out to stakeholders like: Community-Based Organizations; Homeless Centers; and, Juvenile Centers in an effort to connect community-based programs to American Job Center services. As a result, we will be able to more effectively exchange job seeker assessment and placement efforts, exchange best practices, streamline recruitment efforts and avoid duplication of efforts. Together, we will be able to better prepare individuals for "high demand" occupations. Partnerships like these will enable us to pilot innovative strategies to expand the reach of American Job Centers.

G) A Description of how Entities within the American Job Center Delivery System including American Job Center Operators and the American Job Center Partners, will comply with Section 188 of the WIOA, if applicable, and applicable Provisions of the Americans with

Disabilities Act of 1990 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 Disabilities;

Individuals with disabilities will have easy access to necessary and needed levels of service(s) they require. NPWDB, Inc. Staff are responsible for evaluating customer usage in an effort to determine if American Job Centers are meeting the needs of job seekers and employers, especially those with disabilities. When an individual with a disability visits an American Job Center, the following technology is available: a TDD/TYY phone system for the deaf; information on the ADA and accessibility; a magnifying sheet; verbal presentations of the orientation process, etc.; orientation and eligibility packets written in braille; a specialized computer(s) & printer(s) to assist with resume writing, job applications, etc.; a document holder to assist with typing, testing or searches for online employment opportunities; formal referrals to appropriate Core and Required Partner Programs and Services; and, appropriate Supportive Services. If necessary, Job Center Operator, Core and Required Partner Staff use pictorial, written and verbal models of communications. Adequate space for the use of assistance devices or personal assistants is provided for disabled customers. Job Center Operator, Core and Required Partner Staff receive regular training from the West Virginia Division of Rehabilitation Services (WVDRS) Staff, a Core Partner, on disability awareness throughout the program year. WVDRS Staff provides training in areas like: Programmatic and physical accessibility; Serving individuals with disabilities that require Supportive Services; Disability etiquette; Sensitivity training; and, Assistive technology.

H) An Acknowledgement that the Local Board understands that, while Section 188 of the WIOA ensures Equal Opportunity for Individuals with Disabilities, Sub-Recipients may also be subject to the Requirements of : Section 504 of the Rehabilitation Act, which prohibits Discrimination against Individuals with Disabilities by Recipients of Federal Financial Assistance; Title I of the ADA, which prohibits Discrimination in Employment based on a Disability; Title II of the ADA, which prohibits State and Local Government from Discrimination on the Basis of Disability; Section 427 of the General Education Provisions Act; and, West Virginia Anti-Discrimination Act;

The NPWDB, Inc. acknowledges all sub-recipients will be subject to the following provisions of law:

- ☐ Section 188 of the Workforce Innovation & Opportunity Act (WIOA) which prohibits discrimination on the grounds of race, color, religion, sex (including pregnancy, childbirth and related medication conditions, sex stereotyping, transgender status and gender identity), national origin (including limited English proficiency) , age, disabilities, political affiliation or belief and requires that reasonable accommodations be provided to qualified individuals with disabilities in certain circumstances;
- ☐ Section 504 of the Rehabilitation Act which prohibits discrimination against individuals with disabilities by recipients of federal financial assistance;

- ❑ Title I of the Americans with Disabilities Act which prohibits discrimination in employment based on disability;
- ❑ Title II of the Americans with Disabilities Act which prohibits State and local governments from discriminating on the basis of disability;
- ❑ Section 427 of the General Education Provisions Act which requires recipients to ensure equitable access to, and participation in, certain programs run by the U.S. Department of Education; and,
- ❑ West Virginia Anti-Discrimination Act which prohibits discrimination based on race, color national origin, religion, sex, disability, age, citizenship status, AIDS/HIV and off-duty tobacco use.

I) A Description of the Roles and Resource Contributions of the American Job Center Partners;

American Job Center Partners include entities that operate the following programs:

- ❑ Adult;
- ❑ Dislocated Worker;
- ❑ Youth;
- ❑ Job Corps;
- ❑ YouthBuild;
- ❑ Native American;
- ❑ Migrant and Seasonal Farmworkers;
- ❑ Employment Services authorized under the Wagner-Peyser Act;
- ❑ Adult Education and Literacy Activities authorized under Title II of the Workforce Innovation & Opportunity Act (WIOA);
- ❑ Vocational Rehabilitation Programs authorized under Title I of the Rehabilitation Act of 1973;
- ❑ Senior Community Service Employment Programs authorized under Title V of the Older American Act of 1965;
- ❑ Career and Technical Education Programs at the Post-Secondary Level authorized under the Carl D. Perkins and Technical Education Act of 2006;
- ❑ Trade Adjustment Assistance Activities under Chapter 2 of Title II of the Trade Act of 1974;
- ❑ Jobs for Veterans State Grants Program authorized under Chapter 41 of Title 38;
- ❑ Employment and Training Activities carried out under the Community Services Block Grant;
- ❑ Employment and Training Activities carried out by the Department of Housing and Urban Development;
- ❑ Programs authorized under State Unemployment Compensation Laws;
- ❑ Programs authorized under Sec. 212 of the Second Chance Act of 2007; and,
- ❑ Temporary Assistance for Needy Families (TANF) authorized under Part A of Title IV of the Social Security Act.⁶

Each American Job Center Partner must provide: Access to its programs and activities through the American Job Center System, in addition to making them available at other appropriate locations; Use a portion of its funds to the extent consistent with the federal law authorizing the Partner's program(s) and with federal cost principles; To provide applicable career services; and, Work collaboratively with the State and the NPWDB, Inc. to establish and maintain the regional American Job Center system which includes jointly funding the American Job Center infrastructure through Partner contributions that are based on a reasonable cost allocation methodology where

infrastructure costs will be charged to each Partner in proportion to the relative benefits, federal costs principles and any local cost requirements in the federal law authorizing the Partner's program. The NPWDB, Inc. enters into a Memorandum of Understanding (MOU) with each American Job Center Partner that details and outlines roles, responsibilities and contributions to be provided for the sustenance of regional American Job Centers.

J) A Description of how the Local Board will use Individual Training Accounts based on High Demand, "Difficult to Fill" Positions identified with Local Priority Industries identified in Section 1(A);

Individual Training Accounts (ITAs) are vouchers funded by the Workforce Innovation & Opportunity Act (WIOA) that are used to provide training opportunities in "high demand" industry sectors to WIOA eligible individuals via the Eligible Training Provider List (ETPL). The ETPL is maintained and managed by the WorkForce West Virginia Office and is updated annually. The ETPL has over one thousand (1,000) "high demand" training occupations on it with high projected annual openings and high average wage earnings. Adults and Dislocated Workers and Older Youth, including those with barriers to employment, can select a training program of his/her choice through an ITA. An eligible individual's Individualized Employment Plan (IEP) is used to help identify employment goals and activities and Career Pathways direction necessary to obtain career objectives for the individual. Individuals who have met eligibility requirements may receive WIOA training funds through an ITA at a maximum amount of five thousand five hundred dollars (\$5,500) per program year per ITA participant, not to exceed eleven thousand dollars (\$11,000) for a two (2) year period. The maximum amount for the funding of an ITA includes any Supportive Services to be received by the individual. Potential Training Providers on the ETPL include: Institutions of higher education that provide a program that leads to a recognized post-secondary credential; Entities that carry out programs registered under the National Apprenticeship Program; and, Other public or private Providers of a program of training services which may include joint labor-management organizations and eligible Providers of Adult Education and Literacy activities under Title II of WIOA if such activities are provided in combination with Occupational Skills Training. A Provider of training needs to comply with the criteria, information requirements and procedures established in Section 122 of the WIOA to be included on the ETPL.

The NPWDB, Inc. adheres to the process and criteria developed by the WorkForce West Virginia Office with regard to the establishment and ongoing maintenance of an ETPL. The NPWDB, Inc. prioritizes Training Programs that lead directly to a credential, unsubsidized employment or a measurable skill gain. Potential Providers of training will need to demonstrate alignment with "high demand" industry sectors and be able to effectively detail performance information. Participation on the ETPL will be increased through active employer outreach in the region which will allow for a wider range of opportunities in "high demand" industries like: Health Care; Manufacturing; Oil & Gas; and, Utilities and Information Technology to assess their hiring needs and initiate a diverse mix of training opportunities. Once types of training have been identified, they can then be included on the ETPL. The NPWDB, Inc. will work with the WorkForce West Virginia Office and Training Providers and economic development organizations, when necessary, to petition for additional "high demand" occupations to be included on the

ETPL. Current labor market data for the region, as well as other areas in which participants are willing to relocate to, will be used to support the inclusion of any new "high demand" occupations for the ETPL. State and local Providers of Work-Based Training Services, like On-The-Job (OJT), Customized Training and Incumbent Worker Services, are exempt from requirements of the ETPL. Instead, there are local policies in place that oversee the delivery of these programs.

K) A Description of how the Local Board will provide Priority of Service that conforms with the State Plan. This should include a Description of Additional Local Requirements or Discretionary Priorities including Data to support the Need and how the Local Requirements and/or Priority will be documented and implemented for the Adult Program;

In accordance with the State Plan, Priority of Services for Training Services for Adults is as follows: Veterans and eligible spouses, including those who are also recipients of public assistance; Other low income individuals or individuals who are basic skills deficient; individuals who are not Veterans or eligible spouses but are recipients of public assistance, low income or are basic skills deficient; Veterans and eligible spouses who are not recipients of public assistance, who are not low income or who are not basic skills deficient; and then, Individuals who do not meet the above priorities. A "low income" individual is an individual who: Receives, or is a member of a family that receives, cash benefits under a federal, State or local income based public assistance program; Receives an income, or is a member of a family that receives a total family income, for the six (6) month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, payments described in subparagraph (A), and old age and survivors insurance benefits received under Section 202 of the Social Security Act that, in relation to family size, does not exceed the higher of the poverty line for an equivalent period; or; Is a member of a household, two hundred percent (200%) of the lower living standard income level for an equivalent period that received (or has been determined within the six (6) month period prior to application for the program involved to eligible to receive) food stamps pursuant to the Food Stamp Act of 1977; Qualified as a homeless individual, as defined in subsection (a) and (c) of Section 103 of the Stewart B. McKinney Homeless Assistance Act; Is a foster child on behalf of whom State or local government payments are made; or, In cases permitted by regulations promulgated by the Secretary of Labor, is an individual with a disability whose own income meets the requirements of the program, but who is a member of a family whose income does not meet such requirements. Priority of Services for Training Services for Dislocated Workers is as follows: Veterans and eligible spouses, including those who are also recipients of public assistance; other low income individuals or individuals who are basic skills deficient; individuals who are not Veterans or eligible spouses but are recipients of public assistance low income or are basic skills deficient; Veterans and eligible spouses who are not recipients of public assistance, who are not low income or who are not basic skills deficient; and then, individuals who do not meet the above priorities. Priority of Services for Training Services for Youth is as follows: Individuals must be between the ages of eighteen – twenty-four (18-24); Individuals must meet WIOA eligibility guidelines (seventy percent (70%) of the lower living standard income level); Individuals must reside within the six (6) county region (Hancock, Brooke, Ohio, Marshall, Wetzell and Tyler counties); Individuals who are deficient in basic Literacy skills; School Drop-Out; Homeless, Runaway and/or Foster

Child; Pregnant or Parenting; Offender; Any individual, including an individual with disabilities, who requires additional assistance to complete an educational program or secure/maintain employment; Children of Incarcerated Parents; and, Migrant and Farmworker Youth. The NPWDB, Inc. will use its partner network to strengthen its reach to these targeted groups. Essential workplace skills and industry certifications will be made available. Other services to be delivered by Job Center, Core and Required Partner Staff include: Work-Based Skills Training; Life skills; Job readiness training; Career exploration skills enhancement; Occupational training; Follow-up; and, Retention. Basic skills and Occupational Skills Training may be blended to more efficiently serve these target groups. Supportive Services will be made available. Barriers to employment will be addressed and removed. Participant data can be accessed via the Mid-Atlantic Career Consortium (MACC) system and at American Job Centers to ensure that we are adhering to the priority of services policy as outlined by the WorkForce West Virginia Office. The NPWDB, Inc. may, in the future, identify other local priority populations through local policy.

The NPWDB, Inc. uses its partner network to strengthen its reach to targeted populations. The NPWDB, Inc. identifies priority populations through data collected via the Mid-Atlantic Career Consortium (MACC) system and at American Job Centers. The NPWDB, Inc. identifies outside training and service providers who serve same or similar target populations. Job Center Operator Staff gathers information and collect data on the different target populations served.

L) A Description of how the Local Board will utilize Funding to create Incumbent Worker Training Opportunities;

The NPWDB, Inc. allocates up to ten percent (10%) of its Adult and Dislocated Worker training funds to create training opportunities for Incumbent Workers.⁷ Incumbent Worker Training will support the delivery of Career Pathways for existing workers and will create more entry-level positions for job seekers. The NPWDB, Inc. engages in working partnerships with local business and economic development groups, like the Regional Economic Development services (REDs), the Hancock-Brooke Business Development Corporation and the Wetzel and Tyler Counties Economic Development Group. These partnerships benefit businesses and industries alike because it will support skill development of current employers. When considering a request for Incumbent Worker training funds, the NPWDB, Inc. considers the characteristics of the employer's workers like: Length of unemployment; Current skill level; and, If any workers have barriers to employment. Incumbent Worker Training will be provided to an employer or group of employers in the private business sector only. Incumbent Worker Training funding is only considered for employers located in the region. For an employer to be considered for Incumbent Worker funding, the NPWDB, Inc. ensures: The training to be delivered is in a targeted "high demand" industry as identified by the NPWDB, Inc.; and, Employees are going to receive training to address a documented skill shortage in the local labor market; The number of participants the employer plans to train or retrain is no less than twenty-five (25); The training to be provided relates to the competitiveness of participants and the employer(s); That high quality training will be delivered, like: industry recognized, portable credentials and advancement of job opportunities; Job upgrade(s) are available for participants as a result of training and any backfill position(s) created at the entry level; participants receive a measurable wage gain, an

increase of no less than one dollar (\$1.00) per hour post training; and, There is an increase in, or maintenance of, benefits earned. If applicable, training will be provided in new equipment or new technologies as a result of new products or processes that will enhance an employer's competitiveness or avoid or avert the possibility of a pending layoff; and, the employer has a commitment to retain or avert layoffs of Incumbent Workers being trained. The Incumbent Worker Training period will last no more than fifteen (15) days. Incumbent Worker Training may be used for upskilling apprentices who already have established working/training relationships with the Registered Apprenticeship Program.

M) A Description of how the Local Board will train and equip Staff to provide Excellent WIOA- Compliant Customer Service.

Front-line Staff at regional American Job Centers is expected to provide outstanding customer service by being courteous, polite, responsive and helpful at all times to job seekers and employers alike. Staff is knowledgeable about local labor market dynamics and keenly aware of available WIOA training services. They are sensitive to the unique needs of individuals with barriers to employment and are prepared to provide necessary accommodations when and if needed. The NPWDB, Inc., Core and Required Partners work together to offer intensive training to Front-line Staff no less than twice a program year. Training focuses on: Customer service; Instructions on serving clients with disabilities; Properly assessing individuals with barriers to employment; How to access outside resources; and, The introduction of new regulations, policy, procedures, etc. that impacts the delivery of services to job seekers and employers. Front-line Staff participates in cross-training sessions offered at American Job Centers. Cross-training sessions focus on familiarizing Staff about any changes in the delivery of Core and Required Partners' Programs and Services or about any new programs and services being offered in the region. Front-line Staff are knowledgeable about basic eligibility requirements and Core and Required Partner functions so they have the expertise to assist customers properly and efficiently.



1 Under the WIOA, the WorkForce West Virginia Office requires that at least one (1) American Job Center in the region provide access to physical services of all Core Programs on a daily and ongoing basis. We have identified the American Job Center located in Wheeling, Ohio County. However, Core Programs will be available at American Job Centers located in Weirton, Brooke County and New Martinsville, Wetzel County on some level.

2 Job seekers who do not meet certain program's entrance requirements and/or eligibility requirements will be offered alternate services. Veteran customers and those customers with barriers to employment are immediately directed to the appropriate Core Partner Staff so they can receive a thorough needs assessment to determine barriers to employment and services needed.

3 Training Provider Report Cards are prepared and updated locally at the start of each Program Year for each approved Training Provider on the region's ETPL. These Report Cards are maintained in a three-prong booklet by Customer Career Planner/Data Control Coordinators and are also framed and hanged throughout regional American Job Centers. Report Cards inform and educate job seekers on the following information about Training Providers: number of years in training or business; type(s) of training and services provided; training location(s); number of participants enrolled and trained y-t-d; participant completion rates; average participant employment rates; average participant wage rates, etc. Additionally, job seekers accessing an ITA may review consumer reports in order to obtain information about specific educational programs.

4 All customer information collected will be kept confidential.

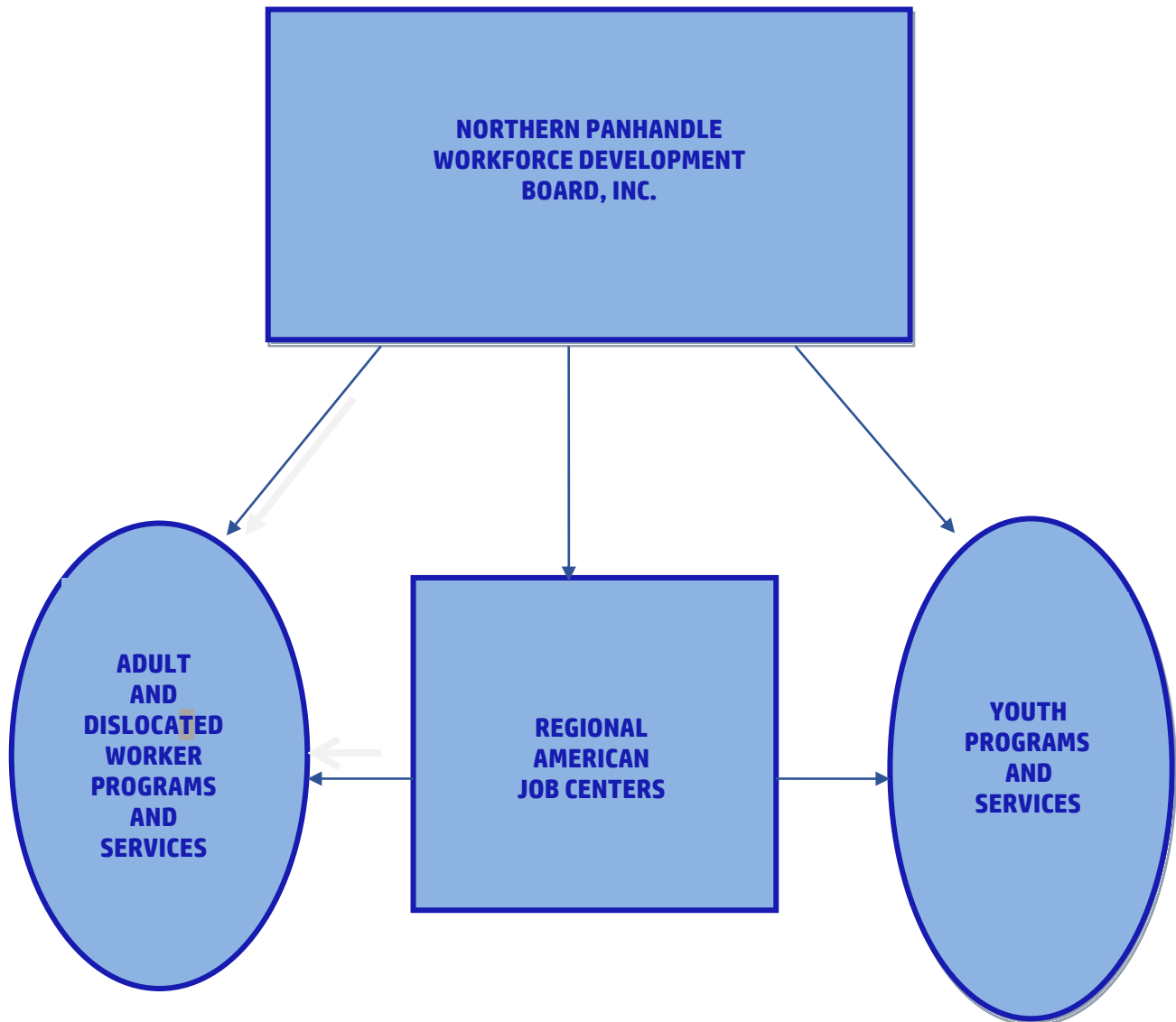
5 The NPWDB, Inc. implements the performance-based contracting method.

6 The Governor of West Virginia has yet to approve whether TANF, a mandated partner under the WIOA, will be required to physically be co-located at American Job Centers and contribute to the sustainment of American Job Centers.

7 An Incumbent Worker does not have to meet the eligibility requirements for career and training services for Adults and Dislocated Workers. An Incumbent Worker under WIOA needs to be employed, meet the Fair Labor Standard Act requirements for an employer/employee relationship and have an established employment history with the employer for at least six (6) months or more.

SECTION 4: TITLE I – ADULT, YOUTH AND DISLOCATED WORKER FUNCTIONS

A) A Description and Assessment of the Type and Availability of Adult and Dislocated Worker Employment and Training Activities in the Local Area;



Programs and Services are designed to begin, advance or transition eligible individuals on a career pathway to employment in “high demand” industries. Adults and Dislocated Workers can improve their economic and/or training opportunities depending on their ability to access education and training that prepares them for college and career success.

ACTIVITY	PARTNER
WIOA Eligibility	Core Partners
TABE Testing	NPWDB, Inc./ WorkForce West Virginia/ AE & Literacy Provider
Outreach, Intake and Orientation	Core Partners
Initial Assessment	Core Partners
Labor Market Information	NPWDB, Inc./ WorkForce West Virginia
Referrals to Programs	Core Partners/Title I Providers
Supportive Services Information	Core Partners/Title I Providers
Unemployment Insurance Information	WorkForce West Virginia
Financial Aid Information	Core Partners
Comprehensive Assessment	Core Partners
Individual Employment Plan	NPWDB, Inc./Core Partners
Career Planning and Counseling	NPWDB, Inc./Core Partners
Work Experiences	NPWDB, Inc./Core Partners
Financial Literacy Services	NPWDB, Inc./Title I Providers
English Language Services	AE/ Literacy Provider
Workforce Preparation	Core Partners
Occupational Skills Training	Training Providers
Skill Upgrading	Training Providers
OJT Training	NPWDB, Inc.
Customized Training	NPWDB, Inc./AE & Literacy Provider
Incumbent Worker Training	NPWDB, Inc./AE & Literacy Provider
Adult Education and Literacy Activities	AE & Literacy Provider
Job Readiness Skills Training	Core Partners

B) A Description of how the Local Board will coordinate Workforce Development Activities carried out in the Local Area with Statewide Rapid Response Activities as described in Section 134 (a) (2) (A);

Rapid Response is a process that provides information and services to area employees experiencing job loss. When a layoff is announced, Rapid Response links community services to employees to assist them in securing new jobs. Involuntary job loss can be one of the most stressful events in a person’s life. This support increases the chances of employees to successfully adjust to the situation and securing new employment. Rapid Response services were created to coordinate transition assistance to impacted employees. The WorkForce West Virginia Office created a statewide Rapid Response Dislocated Worker Unit and regional Rapid Response Units that respond to company layoffs and closures. The Rapid Response Dislocated Worker Unit receives “WARN”

and/or "Sub-Warn" notices that will trigger a need for Rapid Response services. Rapid Response efforts begin as soon as job loss is verified. The Rapid Response Dislocated Worker Unit is made up of representatives from several different State and local agencies/groups. Agencies/groups that make up the Rapid Response Dislocated Worker Unit are: the NPWDB, Inc., Job Center Staff, UI Staff, Resource Center peer advocates, local Wagner-Peyser Staff and other interested stakeholders. The Rapid Response Dislocated Worker Unit and the NPWDB, Inc. are responsible for gathering, collecting and updating any and all information obtained through local Rapid Response services. This information may be shared with other workforce development areas in the State. In accordance with the Workforce Innovation & Opportunity Act (WIOA), Rapid Response activities are delivered quickly to the affected company/plant and workers in order for employees to be provided the opportunity to secure new employment as soon as possible. If Rapid Response activities are rejected, alternative(s) methods will be identified as a means of making affected employees aware of available services. Some alternate methods that are used to increase employee awareness of available services are: newspaper articles, community information sessions, union communications or direct mailings to affected workers' home addresses. Members of the Rapid Response Dislocated Worker Unit hold an employee information session. Some of the information detailed during the employee information session is: American Job Center Programs and Services, WIOA eligibility requirements, current job openings with skill level requirements and an overview of WIOA Programs and Services. This overview includes: An in-depth discussion of WIOA funded training services for demand occupational fields, eligibility requirements for unemployment benefits and their impact on severance packages, welfare payments, including food stamps, application for TAA and/or NAFTA funding, if appropriate, Supportive Services and other available services offered by such agencies as the Veterans Administration, Department of Education, etc. Other additional topics that may be addressed are: How to survive a layoff; How to plan your finances; The wellness impact on the affected worker and his/her family; How to interview; and, How to properly write a resume. A substantial number of affected employees will be interested in retraining as a way to increase their competitiveness in the labor market. The local Rapid Response Team promotes labor-management cooperation with affected employers, employees, union and other community partners.

Members of the local Rapid Response Team regularly communicate and network with key stakeholders in the business and labor community even before the need for Rapid Response services arise. This way, local Rapid Response activities will have a wide base of support for Rapid Response efforts. Local Rapid Response Team members will have a thorough understanding of available employment and training services. Knowledge of these services assists local Rapid Response Team members in anticipating types of services to provide when addressing a layoff. The Rapid Response Dislocated Worker Unit and the local Rapid Response Team identifies available fiscal and staff resources at the State and local levels. Individuals are instructed on how they can access available training and education resources and information. WIOA training services are detailed and offered to affected workers.

C) A Description and Assessment of the Type and Availability of Youth Workforce Development Activities in the Local Area, including Activities

for Youth who are Individuals with Disabilities, which Description and Assessment shall include an Identification of Successful Models of such Youth Workforce Investment Activities;

Social and economic challenges young people face have been heightened by the growing economic crisis of high unemployment and low high school graduation rates. With many young people out of work or stuck in dead-end, low wage and low skills jobs, economic growth slows and social changes increase dramatically. To tackle Youth unemployment and support the needs of today's economy, Youth and their families need to be informed about all education options available to them including college and Career Pathways that don't necessarily include pursuing a four (4) year degree immediately. Youth who connect to high quality Training Programs have a chance to find a way out of poverty and a real chance at economic success. The NPWDB, Inc. remains committed to increasing the number of young people who get on a pathway to economic success by being college and career-ready. The NPWDB, Inc. strives to build on and maintain a Youth workforce development system that steers Youth to post-secondary education and sustainable employment. To do this, the NPWDB, Inc. maintains a strong partnership with the region's Youth Provider, Youth Services System, Inc. (YSS, Inc.), the education community and area employers in order to provide a seamless continuum of career exploration, work readiness activities, life skills development, Work-Based Learning opportunities and quality Work Experiences. The NPWDB, Inc. and YSS, Inc. have developed and implemented strategies that connect Youth with meaningful training, and subsequently, family-sustaining careers through past experiences, research and best practices. The NPWDB, Inc. has identified the following objectives that will help us achieve a stronger and more cohesive Youth workforce development system in the region:

- ❑ Serve Youth, especially those with disabilities, through a high quality Youth workforce development system;
- ❑ Provide intensive year-round Programs and Services that meet the education and employment needs of Youth;
- ❑ Establish strong links with career technical schools and post-secondary schools to align Programs and Services with Career Pathways and current labor market data;
- ❑ Ensure youth activities will lead to the attainment of a secondary school diploma or its recognized equivalent or a recognized post-secondary credential or preparation for post-secondary education and training opportunities; and,
- ❑ Support the development of alternative evidence-based programs and other activities that will enhance choices available to Youth.
- ❑ Pull together resources and funding streams – public, private and foundation - in a strategic way and will draw on the strength of community Providers to create supported pathways that provide Youth with education, skills and access to good jobs and successful careers.
- ❑ Offer a wide range of options, helpful Supportive Services and the flexibility to connect Youth to the most appropriate set of services, including skills like: Teamwork; Leadership; Oral and written communications; and, Ethical responsibility.
- ❑ Work to eliminate the stigma attached to career and technical education (Classes dedicated to robotics, coding and welding provide skills training employers desperately need. So, the NPWDB, Inc. needs to make greater investments in developing new and

effective models of career-focused education that align with the needs of emerging “high demand” industries).

To be eligible to participate in Workforce Innovation & Opportunity Act (WIOA) Title I Youth Programs and Services, a Youth must be either an In-School or an Out-of-School Youth, be a citizen or noncitizen authorized to work in the United States, meet Selective Service Registration requirements and meet WIOA eligibility guidelines.¹ Participating Youth, especially those with significant barriers to employment, receive a preliminary assessment of academic levels, skill levels, aptitudes and supportive service needs. ²

This information will serve as the basis for the development of an Individual Service Strategy (ISS) that will identify employment goals, Career Pathways, achievement objectives and Supportive Services that need to be provided to a Youth in order for him/her to meet career goals. The ISS will be flexible in nature due to the Youth’s age and experience. YSS, Inc., Core and Required Partners will provide Youth with information regarding the full array of applicable and appropriate services and programs that are available to them.

Resources like: educational support, employment opportunities integrated with educational pursuits, work readiness skills, Adult mentoring and other guidance or intervention, as well as follow-up services to ensure retention will be made available and accessible to Youth. YSS, Inc. will help eligible Youth develop the skills needed to succeed in post- secondary education. YSS, Inc. will systemically enrich academic preparation through service learning, internships, career exploration, work readiness training and post-secondary planning. Work readiness skills training will help prepare Youth for success in the workplace; helping them gain industry-recognized credentials with a focus on finding and retaining employment.

IN-SCHOOL YOUTH ELIGIBILITY GUIDELINES	OUT-OF-SCHOOL YOUTH ELIGIBILITY GUIDELINES
An Individual who is: Attending School as defined by State law including Secondary and Post-Secondary School; Not younger than Age 14 (unless it is an Individual with a Disability who is attending School under State law) and not older than age 21 at the Time of Enrollment;	An Individual who is not attending any School as defined under State Law; not younger than 16 or older than 24 at the Time of Enrollment;
A Low Income Individual;	A School Dropout;
An Individual with one (1) or more of the following: Basic Skills Deficient; or, 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;	An Individual who falls within one (1) or more of the following Categories; A Youth who is within the age of Compulsory School Attendance but has not attended School for at least the most recent complete School year Calendar Quarter 6; A Recipient of a Secondary School Diploma or its Recognized Equivalent who is Low Income and is either is Basic Skills Deficient or an English Language Learner; An Individual who is subject to the Juvenile or Adult Justice System; A Homeless Individual as defined in Section 41403 (6) of the Violence Against Women Act of 1994, A Homeless Child or Youth as defined in Section 725 (2) of the McKinney-Vento Homeless Assistance Act, A Runaway, In Foster Care or has aged out of the Foster Care System, A Child eligible for assistance under Section 477 of the Social Security Act or in an Out-of-Home Placement; An Individual who is Pregnant or Parenting; An Individual with a Disability; or A Low Income Individual who requires Additional Assistance to enter or complete an Educational Program or to secure or hold Employment.
An Individual with Disabilities;	
An English Language Learner;	
An Offender;	
A Homeless Child or Youth;	
A Runaway in Foster Care or has aged out of the Foster Care System;	
A Child or Youth a child eligible for assistance under Section 477 of the Social Security Act or in an Out-of-Home Placement;	
An Individual who is eligible to receive a Free or Reduced Priced Lunch under the Richard B., Russell National School Lunch Act; and,	
An Individual who lives in a High Poverty Area.	

YSS, Inc. provides comprehensive industry-specific career exploration and training for In-School Youth. YSS, Inc.'s goal is to ensure Youth Participants graduate high school, and upon graduation, pursue some form of post-secondary training or education in a viable career pathway(s) or successfully gain employment in a high wage, "high demand" occupation. YSS, Inc. works closely with local school systems in an effort to expand access to career exploration activities for In-School Youth. Whenever possible, In-School Youth can be dual-enrolled in Occupational Skills Training, Internships or

work experiences while working to complete their high school diploma. Local school-to-work resources are coordinated with WIOA funded Youth Programs and Services. YSS, Inc. provides comprehensive industry-specific career exploration and training for Out-of-School Youth as well. Activities for Out-of-School Youth include workforce preparation and integrated education and training. This linkage presents an opportunity to coordinate and align Title I and Title II services to ensure successful education and integrated outcomes for Out-of-School Youth. Out-of-School Youth are equipped with work readiness preparation, academic instruction and occupation skills training. YSS, Inc. focuses on developing work readiness and skill learning to employment and employer recognized credentials. YSS, Inc. Staff assists Out-of-School Youth who did not earn a high school diploma earn one or a High School Equivalency Test (HiSet), its equivalent. Out-of-School Youth can receive preparation for Career Pathways employment that focuses on skills upgrading and can be placed into Occupational Skills Training, Internships or paid work experiences while pursuing the completion of their HiSet. YSS, Inc. helps Out-of-School Youth pursue some form of post-secondary training or education in a viable Career Pathway(s) or successfully gain employment in a sufficient wage, "high demand" occupation. Year-long Youth Programs and Services are complimented with four (4) Work Experience Programs that are administered by YSS, Inc.; The "Summer Youth" Work Experience Program; The "Fall Works" Experience Program; The "Winter Works" Experience Program; and the "Spring Works" Experience Program. These programs provide eligible Youth, ages 14-24, with an opportunity to work in "high demand" occupations all year long ³. These programs increase opportunities for Youth to explore different Career Pathways. Additionally, YSS, Inc. Staff oversees and maintains a STEM Youth Room at the Wheeling American Job Center for area Youth to visit and learn. The STEM Youth Room was put in place as a way to introduce Youth to "high demand" training occupations in the science, technology, engineering and mathematics fields and subsequently, entice Youth to enter a training program in any of these fields. The STEM Center has: A XYZ Da Vinci 1.0 Printer with three (3) colors of filament that can create projects with a computer attached to it to create items, etc.; A Lego Mindstorms Robotics Kit as well as STEM curriculum for it that operates through the corresponding laptop; Five (5) VEX Robotics STEM Kits for various building projects tied to engineering and technology; A Laptop set up for NASCAR STEM Program to do various activities through the NASCAR Acceleration Nation Site for younger Youth and through the Ten80 Student Racing Challenge for older Youth; A Weighted Math Building Kit to use math and engineering to build structures; and, A growing Library of forty-nine (49) books based on STEM Curriculum to read and learn from.

The NPWDB, Inc. and YSS, Inc. work diligently to serve Youth with disabilities. The West Virginia Division of Rehabilitation Services (WVDRS), a Core Partner, assists YSS, Inc. in identifying Youth with disabilities who could benefit from participating in year-long Youth Programs and Services.

Year-long Programs and Services help prepare this target group for competitive employment following high school or post-secondary education. Youth with disabilities are recruited to participate in work experience program that connect them to different Career Pathways with employers in "high demand" occupations. Some different approaches that are taken when serving Youth with disabilities are: Identifying and responding to the distinctive needs of Youth with disability; Building Staff capacity (aka:

preparedness); Expanding services and funding; Providing employment and community service opportunities; Proactively targeting and customizing program resources; and, Increasing work opportunities to improve workplace skills, including Internships and apprenticeships. YSS, Inc. refers Youth with disabilities to the WVDRS as necessary once it has been determined the need for these types of services exist based on assessment, testing and through observations. WVDRS provides a number of programs and services to In-School Youth with disabilities: 1) Pre-Employment Transition Services (PETS) to high school students beginning in the 10th grade. PETS include: Job exploration; Counseling; and Work-based learning experiences in an integrated environment in the community that includes Internships, counseling or enrollment in comprehensive training or post-secondary education programs and workplace readiness training to develop social skills and independent living and instruction in self-advocacy including peer mentoring. 2) Each High School in the region has a WVDRS Counselor assigned to guarantee service provisions of students with disabilities. WVDRS Counselors take part in the development of the Individualized Education Program (IEP) for students with disabilities when they are invited to do so. Counselors stay in contact with educators to discuss and resolve any educational difficulties as they arise; and, 3) The Student Transition to Employment Program (STEP). This program uses school personnel to facilitate a more seamless transition from high school to post-secondary activities for students with disabilities. By allowing students to continue working with an individual who has provided them with classroom instruction and/or transition services while in high school, they are working with people who are most familiar with their interests, skills, and barriers to employment. The STEP also includes the use of science and math teachers to provide students with further career exploration opportunities in science, technology, engineering and mathematics (STEM) fields. Engaging high school students early will help them have a better understanding of the labor market and the value of obtaining a post-secondary credential. Students with disabilities that are eligible for vocational rehabilitation services may, in accordance with their IEP, receive assistance from the WVDRS on obtaining post-secondary training.⁴ WVDRS monitors the education achievement of its students.

To be successful, the NPWDB, Inc. and YSS, Inc. needs to maintain strong partnerships with post-secondary institutions, area employers, Core and Required Partners, parents of participating Youth, former Youth Participants and other community-based organizations with experience operating programs and services to area Youth, like: local Housing Authorities, the Boys & Girls Club of the Northern Panhandle, Big Brothers/Big Sisters and the Lee Day Center. Core and Required Partners assist us by: Identifying and recruiting Youth for participation in our programs; Providing Youth referrals; Helping market our programs to area Youth; Providing transportation to Youth to/from regional American Job Centers; and, Providing YSS, Inc. Staff with office space to talk with interested Youth. These entities are regularly asked to input in both the design and the implementation of Youth Programs and Services in the region in an effort to maximize resources and avoid duplication of services.

D) A Description of how the Local Board will coordinate Education and Workforce Development Activities carried out in the Local Area with relevant Secondary and Post-Secondary Education Programs and Activities to coordinate Strategies, enhance Services and avoid Duplication of Services;

The NPWDB, Inc., Core and Required Partners developed Common Referral and Participant Information Release Forms. The NPWDB, Inc., Core and Required Partners use a shared tracking system – Mid-Atlantic Career Consortium (MACC) system. These efforts help decrease duplication of efforts spent on data and information collection for everyone, and more importantly, make the service delivery process more effective and efficient for customers. Regular ongoing discussion and open communications also prevent any duplication of services.

The NPWDB, Inc. uses Adult Education (AE) Career Pathways materials as a way of coordinating education and workforce activities with relevant secondary and post-secondary activities. The NPWDB, Inc. has Memorandums of Understanding (MOUs) in place with the region's six (6) county school systems, Career and Technical Centers and its community college, West Virginia Northern Community College (WVNCC), a Required Partner and the region's Carl D. Perkins Act Training Provider. NPWDB, Inc. Staff regularly attends Northern Panhandle District Consortium Meetings sponsored by WVNCC that address current and future curriculum needs based on most recent labor market data relevant to post-secondary populations. These meetings help guide and implement new programs of study at the college.

A post-secondary education, particularly a degree or industry-recognized credential related to jobs in "high demand," is the most important determinant of difference in a worker's lifetime earnings and income. Education and training goals increase a family's financial resources and helps parent(s) stay employed and maximize their wages. So, the NPWDB, Inc. encourages and supports programs at post-secondary institutions that train job seekers for "high demand" occupations to apply for acceptance on the State's Eligible Training Provider List (ETPL). In an effort to prepare and inform individuals about post-secondary education opportunities, the NPWDB, Inc. provides the most current labor market data, with median earnings, on an annual basis to high schools, Career and Technical Centers and the region's community college - WVNCC. The purpose of providing these entities with this data is to educate them on which occupations are in "high demand." Youth Services System, Inc. (YSS, Inc.) meets regularly with high school guidance counselors to encourage their input and feedback about career planning and preparation activities offered for Youth at regional American Job Centers. The West Virginia Division of Rehabilitation Services (WVDRS) always strives for quality career-based employment outcomes for its customers. The WVDRS has a long history of providing customers with the necessary training that leads to a recognized post-secondary credential because they understand the importance of having a recognized post-secondary degree from the perspective of employers and job seekers. The WVDRS has assigned a number of counselors to work solely with high school students with disabilities on pre-employment transition services that include: Job exploration; Counseling; Work based learning experiences which may include In-school or after school opportunities or experiences outside the traditional school setting; internships that are provided in an integrated environment to the maximum extent possible; Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs at institutions of higher education; Workplace readiness training to develop social skills and independent living; and, Instruction in self-advocacy which may include peer monitoring.

E) A Description of how the Local Board will coordinate Workforce

Development Activities carried out under this Title in the Local Area with the Provision of Transportations, including Public Transportation and other Appropriate Supportive Services in the Local Area;

Workplace transportation has been identified by the NPWDB, Inc. as one of the major barriers to employment in the Northern Panhandle region. There are only two (2) counties that have public transportation available: Ohio County and Hancock County. And, Hancock County's public transportation system is only available on a part-time basis. The NPWDB, Inc. will continue to actively participate in conversations around workplace transportation on a State, regional and local level. The NPWDB, Inc. will explore carpooling efforts, transportation allowances, use of taxi services and the use of technology in connecting participants to training and employment opportunities.

F) A Description of how the Local Board will utilize Local Adult Funding based on Adult Priority Groups as specified in the State Plan;

The NPWDB, Inc. adheres to State and Federal guidelines regarding Priority of Services provided to Veterans and other priority groups. In particular, the NPWDB, Inc. works diligently to: Increase Veteran access to career services and Work-Based Training Program and increase employer use of Work-Based Training Programs as an incentive to hire Veterans and other identified target populations.

The NPWDB, Inc. works with Core and Required Partners to develop new innovative ways to address customers' barriers to employment and ensure that they have essential workplace skills and industry certification in order to meet their full career potential. Front-line Staff at regional American Job Centers who work with targeted populations focus on the delivery of intensive services and needed Supportive Services. Front-line Staff is expected to become more involved and proactive in determining the needs of customers and direction(s) to be taken with regard to career success. Services to be provided for individuals include: Workplace skills training; Life skills training; Job readiness training; Barrier removal; Career exploration; Occupational training; Work-Based Training; and, Follow-up. Basic skills and occupational training is provided as a means of moving Adults more quickly and efficiently towards family-sustaining employment. The NPWDB, Inc. ensures strong collaboration with Core and Required Partners to ensure alignment and availability of adequate Supportive Services to these target groups.

G) A Description of how the Local Board will utilize Local Dislocated Worker Funding;

A Dislocated Worker is an individual who has been terminated or laid off from employment; is eligible for or has exhausted unemployment compensation; is unlikely to return to previous industry or occupation; was self-employed but is now unemployed as a result of general economic conditions in the community in which the individuals resides or because of natural disasters; is a displaced homemaker; is a spouse of a member of the Armed Forces on active duty; or, is a spouse of a member of the Armed Forces on active duty who has experience a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member. The NPWDB, Inc. provides this target group with opportunities to gain skills

that would allow them to quickly reconnect to jobs with family-sustaining wages. The skill and education levels of Dislocated Workers are assessed to define skills gaps, transferable skills and create an Individual Employment Plan (IEP). Barriers to re-employment will be addressed. The IEP focuses on: Identifying Career Pathways; and, Identifying occupational training that leads to certification, credential attainment and/or employment opportunities. Credentials are important because they allow an individual to be marketable within a "high demand" industry or occupation. Employment opportunities will provide the individual a chance to obtain work experience and skills through performance in an actual job. In order to support challenges that Dislocated Workers face in obtaining employment and training, Supportive Services will be made available. Referrals to Core and Required Partner services will be made as necessary.

H) A Description of how the Local Board will define "Self-Sufficiency" for Employed Adults and Employed Dislocated Worker Participants;

An individual is considered "self-sufficient" if he/she is considered to be non-reliant, or is a member of a family that is no longer reliant, on cash payment (TANF) or non-cash benefits (Food Stamps) under a Federal, State or local income based assistance program; and, He/she is employed with a fringe benefit package that includes medical; and, is employed with a family income annualized at being greater than 125% of the Lower Living Wage Standard Income Level according to the West Virginia Lower Living Standard Income Levels Guideline Chart.

I) A Description of the Local Board's Definition of "Unlikely to return to Previous Industry or Occupation" when required for Eligible Dislocated Workers Services;

"Unlikely to return to work" refers to an individual who has family or personal issues and a lack of necessary skills or difficult financial circumstance whereby it is affecting the individual's likelihood to return to a previous industry or occupation. This individual is laid off without a recall date and the projected annual increase in employment growth according to labor market data is fewer than thirty (30) jobs in the previous occupation. Eligibility documentation criterion is: Letter stating that the layoff is permanent or a copy of the WARN Notice stating closure of business where individual was employed is permanent; Self-attestation statement from individual.

J) A Description of how the Local Board will interpret and document Eligibility Criteria for "Requires Additional Assistance to complete an Education Program or to secure or hold Employment" as set for the in the State Youth Guidance Policy and WIOA Sections 129 (a)(1)(B) (iii)(VII) and (a)(1)(C) (iv) (VII);

The NPWDB, Inc. has determined that a Youth who has had only low-wage employment, short-term employment or an inability to secure a wage at a self-sufficient level for a single Adult (\$10.00 per hour) will be considered as "requiring additional assistance." Eligibility documentation criterion is: Copy of the Individual

Service Strategy (ISS); Case notes; Intake application, Registration form; and, Applicant statement. These documents must include a barrier to employment, other than an eligibility requirement barrier.

K) A Description of the Documentation required to Demonstrate "A Need for Training;"

A need for training is a collaborative decision made with input from the individual and his/her Customer Career Planner/Data Control Coordinator. Past activities, experience and education levels, job readiness level and the Individual Employment Plan (IEP) will determine the need for training. Eligibility documentation criterion is: Layoff Notice, if applicable; Proof of unemployment; Self-attestation statement; Proof of low income; Proof of public assistance; and, Justification statement.

L) A Description of how the Local Board will provide the Fourteen Required Program Elements for the WIOA Youth Program Design;

Youth Services System, Inc. (YSS, Inc.) develops an Individual Service Strategy (ISS) or Individual Employment Plan (IEP), aka: "action" plans, for each Youth's based on needs and goals. YSS, Inc. has the discretion to determine what specific programs and/or services will be provided to Youth based on the Youth's objective assessment for the purpose of identifying appropriate career services to be delivered. As an example, if YSS, Inc. Staff identifies any "barriers" a participating Youth has, basic skills deficiencies are addressed and whether there exist a need for the Youth to obtain a high school diploma or a High School Equivalency Test (HiSet). Afterwards, the Youth can work towards an occupational training goal, which will encompass work readiness skills training, and hopefully, employment. However, in all instances, YSS, Inc. will ensure Youth are provided with access to the fourteen (14) required program elements of services in accordance with the Workforce Innovation & Opportunity Act (WIOA). YSS, Inc. makes every effort to identify additional, available outside services and resources that may be accessed at no cost to the Youth. However, because of specific, special needs of some at-risk Youth, funding for certain programs or services is directly provided by the NPWDB, Inc. or YSS, Inc. in order to ensure success for the participating Youth.

PROGRAM ELEMENT	DESCRIPTION OF SERVICES
Tutoring, Study Skills Training, Instruction and Drop-Out Prevention	From note-taking and homework skills to time management and test taking, this training helps Youth achieve academic success. Intensive one-on-one tutoring is provided with an emphasis on improving Literacy and skills so Youth can become gainfully and successfully employed. Drop-out prevention strategies will be used for Youth who are still In-School. In-School Youth are provided with instructional support and homework assistance while remedial tutoring is provided to Out-of-School Youth who learn the skills and knowledge needed to graduate or pass the HiSet exam. This type of training helps participating Youth achieve grade level proficiency in math, reading, and writing. It also fosters good study habits so Youth can be better prepared for employment.
Alternative Secondary School Services/Dropout Recovery Services	These services focus on those Youth who have dropped out-of-school. Most dropouts are likely to have behavioral difficulties, academic failures, pregnancy, family or job obligations or experience problems like: poverty, incarceration, and economic hardship. The goal is to recruit these Youth back into an educational setting while providing the necessary support for the attainment of a diploma or the HiSet. Dropouts can choose an alternative form of education where skills and services offered meet their needs and skills that will ultimately help prepare them for employment. Curriculum of Drop-Out Prevention Programs focuses on encouraging Youth to remain in-school. Drop-Out Prevention classes may be coordinated with local school districts or Adult Education (AE).
Paid and Unpaid Work Experiences	Work experience programs are structured learning experiences. Opportunities for career exploration and skill development will also be available. Participating in these programs help eligible Youth establish work history, credibility and move out of poverty. Career awareness and development training helps Youth define their career options and understand the relationship between education and the world of work. Work-Based Learning involves actual Work Experiences that are conducted to promote contextual learning opportunities. Integration of the classroom and the worksite is always encouraged. These types of programs will take place in workplaces that may be private for-profit, non-profit or public. Length of training will be for a specific period of time. Work Experiences will be created in science, technology, engineering and math (STEM) fields and in other "high demand" occupations within specific industry sectors. These opportunities will vary from paid Internships to training and may be subsidized or unsubsidized. WIOA funds may be used to pay wages to Youth Participants on a work experience program(s) Types of work experience programs are: A "Summer Works" Program; A "Fall Works" Program; A "Winter Works" Program; and, A "Spring Works" Program. which are all administered by YSS, Inc. in the region. In addition to the actual work experience component, this program provides Youth with competencies like, computer Literacy, customer service, job readiness, interpersonal communications, problem solving and financial Literacy. Work Experience Programs run for about eight (8) weeks throughout the program year. About sixty (60) eligible Youth within six (6) counties are recruited for

	<p>participation. Priority is given to Youth already enrolled in year-long Youth Programs and Services. Newly recruited Youth will be accepted into the Summer Youth Work Experience Program who will be required to enroll in year-long Youth Programs and Services after their participation in the Summer Youth Work Experience Program has ended. Job placements will be made in "high demand" occupations with private for-profit Career Pathways businesses, non-profit and public organizations in the region. Services are delivered to participating Youth by YSS, Inc. in this program. The NPWDB, Inc. monitors Youth activities on a regular basis to ensure compliance with safety and child labor laws. Program procurement rules and regulations require a Training Provider(s) of Youth Programs and Services to ensure safety and child labor laws are adhered to at all times. Hard copy Child Labor Laws are distributed to appropriate Training Programs and work sites for public posting. Work and training sites for Youth are notified in writing of any and all non-compliance issues or deficiencies and the need for corrective action.</p>
Occupational Skill Training	<p>An On-The-Job (OJT) Program will be made available to older Youth ages 18 -24, including those with disabilities. This program matches employer needs with a Youth's qualifications. The NPWDB, Inc. will engage area employers from "high demand" industries in its On-the-Job (OJT) program. Through participation on the OJT program, an employer may be eligible for the Earned Income Tax Credit. Occupational training is provided by an employer to a Youth Participant in exchange for reimbursement based on the region's Employer Reimbursement Sliding Scale to cover the extraordinary cost of providing training and supervision related to the training. An OJT contractual agreement must be limited to a period of time required for a Youth Participant to become proficient in the occupation for which the training is being provided. However, an OJT contractual agreement will not exceed a six (6) month period or 1040 hours under any circumstance. OJT funds may be used when placing a Youth Participant into a Registered Apprenticeship Program. An OJT contractual agreement may be written with a Registered Apprenticeship Program or a participating employer in a Registered Apprenticeship Program for the OJT portion of the Registered Apprenticeship Program. Depending on the length of the Registered Apprenticeships and available funding, WIOA funds may cover some or all of the Registered Apprenticeship Training. These opportunities mean the organization of high quality education, training and other services to help Youth with different needs accelerate their education and career advancement. These opportunities are used to support a Youth's transition from education into and through the workforce. YSS, Inc. regularly invites representatives from regional educational institutions to speak to Youth at training workshops held throughout the program year.</p>
Educational Training Opportunities	<p>YSS, Inc. includes representatives of Training Providers who provide training in non-traditional occupations like: truck driving, mining and welding. Graduates for non-traditional Training Programs are invited to share their educational and job experiences with Youth. The NPWDB, Inc. provides older Youth, ages 18-24, with the opportunity to participate in the region's Individual Training Account (ITA) Program. Older Youth are provided with the opportunity to select a "high demand" occupational training program of his/her choice. Participating Youth can receive \$5,500 per program year not to exceed \$11,000 for a two (2) year period for training. Pell grants, established under Title IV of the Higher Education Act of 1965, or any other grant assistance available to pay for the costs of training, must be accessed first before WIOA funds can be used.</p>

Leadership Development	Leadership development activities to be made available to Youth are: Analyzing strengths and weaknesses; Setting personal and vocational goals and building self- esteem, confidence, motivation and abilities to carry them out fully; Participating in community life and effecting positive change; Guiding or directing others on a course of action, influence, opinions and behavior of others; and, Serving as a role model. Leadership development training will promote positive life skills learning.
Supportive Services	Supportive Services may be provided, if needed and necessary, especially to older Youth, ages 18-24. These services include, but are not limited to: transportation, child care support, food stamps, health assistance, dependent care costs, housing assistance, work attire, medical child health assistance, earned income tax credit, referrals to medical services, etc. If needed, the NPWDB, Inc. may also provide comprehensive guidance assistance, including drug and alcohol abuse counseling, as well as referral to appropriate outside counseling group(s).
Comprehensive Guidance & Counseling	These services will be in place to support a Youth's transition throughout school, achievement of a diploma or HiSet or preparation for post high school "next steps." Comprehensive guidance and counseling is an integral part of the "support" system that advances high quality learning and job opportunities. It promotes successful transitions by providing opportunities for Youth to acquire and master critical academic, career, personal, social and community involvement skills. These skills enable Youth to learn, work, interact with others and contribute.
Adult Mentoring	An Adult mentor is a person who devotes time to a Youth in an effort to help them achieve their potential and discover their strengths. These services will provide Youth with assistance in defining career goals and objectives that can include job shadowing and career exploration, encouraging positive choices and supporting academic achievement.
Follow-Up Services	Follow-up services are conducted for both In-School and Out-of-School Youth. Follow-up services include, but are not limited to: Career exploration; Group or individual meetings to discuss career and education opportunities; Use of the internet to research education; and, Career information, mentoring, tutoring and job shadowing. Follow-up services will be conducted by YSS, Inc. and will be provided for a period of no less than twelve (12) months. The scope of these services may vary on an individual basis and may be more intensive for Youth who participated in programs for a longer period of time.
Financial Literacy Education	Services provided include helping Youth create household budgets, initiate savings plans and make informed financial decisions about education, retirement, home ownership, wealth building or other savings goals, manage spending, credit and debt including credit card debt, be aware of the availability and significance of credit reports and credit scores in obtaining credit including determining their accuracy and their effect on credit terms, understand, evaluate and compare financial products services and opportunities, etc. These activities also address particular financial Literacy needs of non-English speakers including providing support through the development and distribution of multilingual financial Literacy and education materials.

Entrepreneurial Skills Training	This training helps Youth develop the skills necessary to start and run their own businesses. It offers Youth the opportunity to gain critical skills that will open up a world of possibilities. Youth learn resilience, professionalism, self-confidence, leadership, teamwork and a host of other abilities that will prepare them for a pathway to success.
Labor Market Data	Youth will be provided with access to the most recent labor market data and trends for the region and State that will enable them to acquire the educational skills and training necessary to get good jobs with high wages.
Post-Secondary Education and Training	Older youth, ages 18 -24, who are eligible to access post-secondary education or training services, may do so through Individual Training Accounts (ITAs). ITAs are vouchers funded under the WIOA and are used by Older Youth to access training in "high demand" occupations. YSS, Inc. will study the Youth's IEP to identify educational and employment goals and activities and the necessary Career Pathways the Youth needs to take in order to obtain their objectives. Older Youth may be provided training through an ITA at the maximum amount of \$5,500 per program year not to exceed \$11,500 for a two-year period. The maximum amount for the funding of an ITA includes any Supportive Services payments to be received by the Older Youth.

M) A Description of the Steps the Local Board will take to ensure as least 20% of Youth Funds are used for Work-Based Training Activities;

At least twenty percent (20%) of Youth funds must be spent on paid and unpaid work experiences that incorporate academic and occupational education for In-School and Out-of-School Youth. Allowable expenditures beyond wages include: Staff time spent identifying potential work experiences opportunities; Staff time working with employers to develop the work experience; Staff time spent working with employers to ensure a successful work experience; and, Staff time spend evaluating the work experience, participant work experience orientation sessions, classroom training or the required academic education component directly. Youth Services Systems, Inc. (YSS, Inc.), the region's Provider of Youth Programs and Services, track program funds spent on paid and unpaid work experiences, including wages and staff costs for the development and management of work experiences and report such expenditures to the NPWDB, Inc. in monthly and close-out reports. Also, the NPWDB, Inc. has developed an internal tracking form for YSS, Inc. to use when tracking these expenditures exclusively. Work experience expenditures are also tracked in the Mid-Atlantic Career Consortium (MACC) system. The percentage of funds spent on work experiences is calculated based on the total local area Youth funds expended for work experiences rather than calculated separately for In-School and Out-of-School Youth. Administrative costs are not subject to the twenty percent (20%) minimum work experience expenditure requirements.

N) A Description of the Local Board plan to serve 75% Out-of-School Youth and identify Specific Steps that have been taken to meet this new Goal;

At least seventy-five percent (75%) of the region's total Youth program budget is allocated and spent on serving Out-of-School Youth. Youth Services Systems, Inc. (YSS, Inc.), the region's Provider of Youth Programs and Services, tracks funds spent on serving Out-of-School Youth to the NPWDB, Inc. in monthly and close-out reports in accordance with their contractual agreement. YSS, Inc.'s contractual agreement clearly states that no less than seventy-five percent (75%) of YSS, Inc.'s budget award must be spent serving Out-of-School Youth. The NPWDB, Inc. charts and tracks these expenditures in the Mid-Atlantic Career Consortium (MACC) system no less than once a month. Although this is a goal under the Workforce Innovation & Opportunity Act (WIOA), YSS, Inc., with guidance from the NPWDB, Inc., spends no less than seventy-five percent (75%) of its budget award on serving Out-of-School Youth by forming effective working relationships with the local school system, alternative schools, juvenile centers, housing authorities and simply through word-of-mouth. Additionally, no less than seventy-five (75%) of Youth targeted for participation in work experience programs are Out-of-School.

O) If the Local Area has contracted with Youth Service Providers, provide a List and Description of Services;

To be eligible to participate in Youth Programs and Services, Youth must be between the ages of 14 and 24 and meet Workforce Innovation & Opportunity Act (WIOA) eligibility requirements. Youth Services Systems, Inc. (YSS, Inc.), the region's Youth Provider, works to develop and implement strategies for connecting Youth with meaningful careers or training. Objectives for Youth Programs and Services are two-fold: 1) Providing quality Programs and Services in "high demand" occupations to area youth; and, 2) Developing strong Career Pathways Services that establish linkages with community and technical centers and post-secondary schools in an effort to align programs with Career Pathways and labor market demand.



YOUTH PROVIDER	DESCRIPTION OF SERVICES
Youth Services Systems, Inc. (YSS, Inc.)	<p><u>DELIVERY OF THE FOURTEEN (14) REQUIRED PROGRAM ELEMENTS TO BOTH IN-SCHOOL AND OUT-OF-SCHOOL YOUTH.</u></p> <p><u>IN-SCHOOL YOUTH ACTIVITIES</u></p> <p>Assessment of academic levels, skill levels, aptitudes and supportive service needs; Industry-specific career exploration and training in family-sustaining employment in either a high wage in a "high demand" occupation or in pursuing post-secondary training or education toward viable Career Pathways. (Whenever possible, In-School Youth Participants can be dual-enrolled in Occupational Skills Training); Internships or work experiences while completing a high school diploma; Developing skills needed to succeed in post-secondary training or education; Opportunities for career exploration and skill development; Academic preparation through partnerships, career exploration, work readiness training and post-secondary planning. (Whenever possible, In-School Youth Participants can be dual-enrolled in credit earnings and non-remedial college courses while completing their high school diploma).</p> <p><u>OUT-OF-SCHOOL YOUTH ACTIVITIES</u></p> <p>Assessment of academic levels, skill levels, aptitudes and supportive service needs; Identify unsubsidized employment opportunities; Build work readiness skills necessary to succeed in the workplace including helping them gain industry-recognized credentials; Delivery of Career Pathways employment by placing participants into Occupational Skills Training or paid Work Experiences while they earn their High School Equivalency Test (HiSet); Develop life skills such as leadership and effective communications; Work experience opportunities. On-The-Job (OJT) training opportunities; Post-secondary occupational training using Individual Training Accounts (ITAs); Opportunities for career exploration and skill development; Apprenticeship opportunities; Internships and job shadowing.</p>

P) A Description of how the Local Board will provide Basic and Individualized Career Services to Customers. The Description should explain how Individualized Career Services will be coordinated across Programs/Partners in the American Job Centers, including Vocational

Rehabilitation, TANF and Adult Education and Literacy Activities. This Description should specify how the Local Area will coordinate with these Programs to prevent Duplication and improve Services to Customers.

In an effort to streamline the referral and service delivery process, the NPWDB, Inc., Core and Required Partners have coordinated the delivery of basic and individualized career services. We also developed a Common Referral and Information Release Form and a Common Intake Form that is being used by all of us. We also share participant information through the Mid-Atlantic Career Consortium (MACC) system. Steps taken have reduced the burden on the customer to produce similar information and data multiple times.

Basic or Individualized Career Services are provided to customers at the first point of entry into the local workforce development system. Basic Career Services include: A determination of eligibility; Assessment of Literacy and English language proficiency levels; Access to labor market data; Information on "high demand: industry sectors; Job search and placement assistance; and, Performance and program cost information on eligible Training Providers. Individualized career services include: Comprehensive assessment of skills and services needed by the participant; Development of an Individual Employment Plan (IEP) to identify employment goals, objectives and appropriate combination of services to help the participant achieve his/her employment goals; Individual counseling and mentoring; Career planning; Job readiness; and, Referral to Occupational Skills Training. The type, level and degree of basic or individualized career services to be delivered will be dependent on the customer's needs as identified in the initial assessment. If the first point of entry is at an American Job Center, an orientation to available services, which is provided by Job Center Operator Staff, is conducted for customers seeking employment and/or training information. The orientation process allows customers to access a wide range of Career Services, inclusive of Core and Required Partner services. Basic or Individualized Career Services can also be offered to customers during workshops conducted by WorkForce West Virginia, a Core Partner. If customers access Career Services through Core or Required Partner Programs not located at an American Job Center, Basic or Individualized Career Services are provided by the Partner at that location. If a Partner determines the customer would be best served through Individualized Career Services, the Partner will determine if another Partner(s) can provide additional Individualized Career Services and make appropriate referrals. Any assessments done on customers either at an American Job Center or through a Partner program(s) will be shared among programs. If an Individual Employment Plan (IEP) is developed for the customer, it too will be shared among all stakeholders. The same goes for case management notes. These steps eliminate duplication and maximize available services and funding.

The lines of communications have been significantly streamlined at the American Job Center in Wheeling because Title I, WorkForce West Virginia, the West Virginia Division of Rehabilitation Services (WVDRS) and Adult Education (AE) are co-located there. The same can be said for other American Job Centers in the region, but on a limited basis.

Co-location allows us to blend our services so they are more responsive to customers' needs.

The NPWDB, Inc. continues to work with the Temporary Assistance to Needy Families (TANF) Program offered by the West Virginia Department of Health and Human Services (DHHR), a Core Partner, to better coordinate services at American Job Centers. Job Center Operator Staff is familiar with TANF programs and refer customers to TANF or Food Stamps programs when deemed necessary. In October 2018, the WVDHHR began offering its Supplemental Nutrition Assistance Program (SNAP) out of the American Job Center in Wheeling. The SNAP Program was made available to eligible individuals from Ohio County only. However, in October, 2019, the SNAP Program was expanded to include eligible individuals Hancock, Brooke and Marshall Counties as well.

Regular meetings will continue to be held between Job Center Operator, Core and Required Partner Staff in an effort to share information about programs and services and work for continuous improvement of customer-focused processes at regional American Job Centers.

Q) Describe the Local Board's Follow-Up Policy. This should include Follow-Up Requirements, Frequency of Contact and Required Documentation.

Follow-Up Services are provided to each Adult and Youth participating in a Workforce Innovation & Opportunity Act (WIOA) funded program or service. Follow-up Services may include: Referrals to medical or community resources; Tracking progress on-the-job; Assistance securing better paying job; Career development and further education planning; Assistance with work-related problems; Adult mentoring; and, Leadership development. Hard copy documentation that supports Follow-Up Services provided to Adult and Youth Participants are maintained in the participant's file by Job Center Operator Staff.

Follow-Up Services to Adult Participants are provided by Customer Career Planner/Data Control Coordinators no less than once a quarter for a period of no less than twelve (12) months upon completion of training or exit from the local workforce development system. Documentation of Follow-Up Services is entered into the Case Notes Section of the Mid-Atlantic Career Consortium (MACC) system by Customer Career Planner/Data Control Coordinators. Hard copy documentation of Follow-Up Services is provided to the NPWDB, Inc. MACC Coordinator who enters the information in the Outcome Screen Page of the MACC system for that Adult Participant. Follow-Up Services for Youth Participants who are enrolled in Year-Long Programs and Services are conducted by Youth Services Systems, Inc. (YSS, Inc.), the Provider of Youth Programs and Services, for a period of no less than twelve (12) months upon completion of the program. Follow-Up Services for Older Youth enrolled in the Individual Training Account (ITA) Program are conducted by Customer Career Planner/Data Control Coordinators. Documentation of Follow-Up Services is entered into the Case Notes Section of the MACC system by either YSS, Inc. Staff or Customer Career Planner/Data Control Coordinators. Hard copy documentation of Follow-Up Services is provided to

the NPWDB, Inc. MACC Coordinator who enters the information in the Outcome Screen Page of the MACC system for that Youth Participant.

During each quarter for Adults and each month for Youth, Follow-Up contacts are made to the participant to confirm whether or not he/she is employed. Adult and Youth Participants who are not working, or enrolled in advanced training, may request help in securing additional needed services.

Follow-Up Services are done each quarter after an Adult or Youth Participant completed training or exits. Even though, performance measures are based on the second (2nd) and fourth (4th) quarter at employment or exit, we begin providing Follow-Up Services during the first (1st) quarter and continue through the fourth (4th) quarter to: Make certain we do not lose contact with the participant; To ensure all participant data is captured and entered into the MACC system: and, To ensure participants are getting all the services needed.

The scope of Follow-Up Services may vary on an individual basis depending on the participant's needs. Follow-Up Services help participants complete training and/or maintain employment and provides a continuous link to the local workforce development system as a whole. Follow-Up contact is meaningful and client-centered. It can be a simple phone call or text or a one-on-one visit.



1 Determination of whether a Youth Participant is an In-School or Out-of-School Youth will be made by Customer Career Planner/Data Control Coordinators at American Job Centers at the time program enrollment. Once the school status of a Youth is determined, that school status will remain the same through the Youth's participation in a WIOA youth activity. Up to five percent (5%) of In-School Youth Participants only refers to the barrier for an In-School Youth who required "additional assistance" to complete an educational program or to secure or hold employment. This criterion may result in additional services being provided to In-School Youth with more significant barriers to employment; an individual who is pregnant or parenting; an individual with a disability; or, an individual who requires additional assistance to complete an educational program or to secure or hold employment.

2 The NPWDB, Inc. will use the Test of Adult Basic Education (TABE) Assessment Tool to assess participating youth. The NPWDB, Inc. may consider using up to ten percent (10%) of its youth funding to implement additional pay-for-performance contracts to administer youth activities.

3 During work experience programs, Youth are required to complete a work readiness training component that includes the development of a career pathway(s), time management, communication skills, financial literacy, resume writing, etc.

4 The income level, for eligibility purposes, of a Youth with a disability will be based on the Youth's own income rather than his/her family's income.

5 Out-of-School and Older Youth may participate in either Youth or Adult Programs or both depending on individual assessment of skills and age.

6 Follow-Up Services will be integrated into the design of Adult and Youth Programs and Services.

SECTION 5: WAGNER-PEYSER FUNCTIONS

A) A Description of Plans and Strategies and assurances concerning Maximizing Coordination of Services under the Wagner-Peyser Act and Services provided in the Local Area through the American Job Center Delivery System to improve Service Delivery and avoid Duplication of Services;

Wagner-Peyser Staff is present at each regional American Job Center. They are fully engaged in the delivery of American Job Center Programs and Services to job seeking and employer customers. Wagner-Peyser Staff delivers many basic and individualized Career Services to customers at American Job Centers. Wagner-Peyser Staff conducts regular job search workshops for customers. Workforce Innovation & Opportunity Act (WIOA) Employment and Training Programs and Services are discussed at these workshops. The NPWDB, Inc. and Core and Required Partners developed a Common Referral and Information Release Form and a Common Intake Form that are being used by all Core and Required Partners. Participant information is shared in the Mid-Atlantic Career Consortium (MACC) system. Wagner-Peyser Staff hosts employer job fairs and recruiting events with Job Center Operator Staff and other Core and Required Partners. They share the following information and data with Job Center Operator, Core and Required Partner Staff: State and local workforce data which will allow individuals, employers and Training Providers to obtain information related to job opportunities, labor supply, labor market and workforce trends within particular "high demand" industries. Roles and responsibilities for Wagner-Peyser programs will be outlined in the Memorandum of Understanding (MOU). Wagner-Peyser Staff serves on the Board of Directors and the Business Services Team (BST). Wagner-Peyser Staff provided input on this local plan and collaborated with the NPWDB, Inc., Core and Required Partners in the development and implementation of a regional Strategic Plan that it is in alignment with WIOA regulations and the Board of Director's goals.

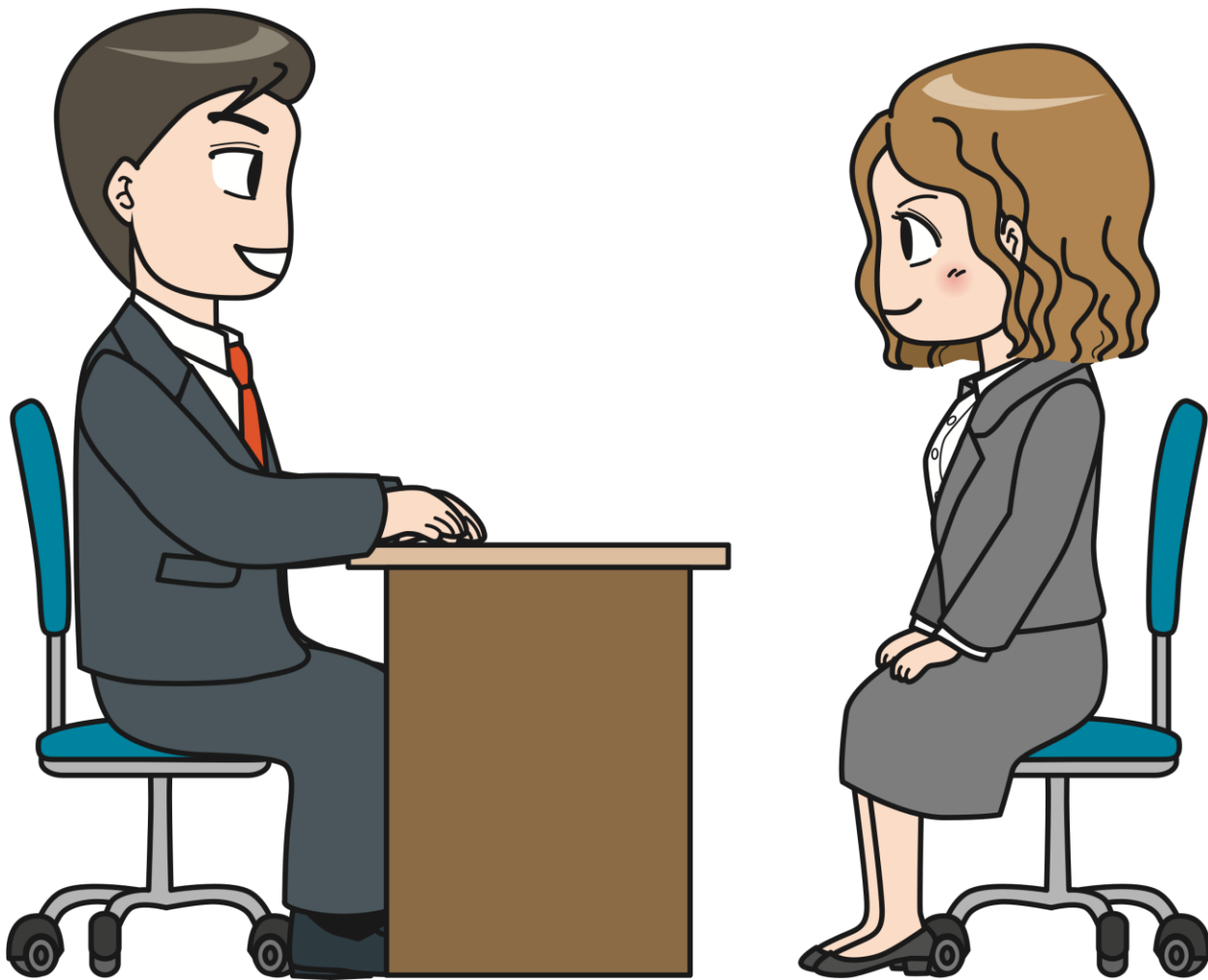
B) A Description of how the Local Board will utilize the Wagner-Peyser Program to provide access to Local Workforce Development Services for Unemployment Insurance Claimants;

Individuals receiving unemployment benefits are provided with regular workshops and informational sessions to help them get back to work as quickly as possible. Due to co-location, Wagner-Peyser Staff works closely with the NPWDB, Inc. and other Core and Required Partners to assess individuals who have barriers to return to work and quickly enroll them in Programs and Services under Dislocated Worker funding.

C) If applicable, a Description of how the Local Board will ensure that Migrant and Seasonal Farmworkers in the Local Area will be provided Employment Services.

Migrant and Seasonal Farmworkers (MSFWs) Outreach Specialist will conduct outreach to employed and unemployed MSFWs who are not visiting the WorkForce West Virginia

Office to ensure these workers are aware and have access to employment, training and supportive services. This information will be provided either written or verbally and in a language readily understood by MSFWs. While conducting outreach, the Specialist will use the specified application to offer MSFWs the full range of employment services, benefits and protections, including the full range of counseling, testing and training services. Core and Required Partner Staff, like the Community College and Higher Education, Social Service agencies, etc. will contact employers and provide services as well. Outreach efforts will also be coordinated with public and private service agencies as deemed necessary.



SECTION 6: TITLE II – ADULT EDUCATION AND LITERACY FUNCTIONS

A) A Description of how the Local Board will coordinate Workforce Development Activities in the Local Area integrating the Provisions of Adult Education and Literacy Activities under Title II of WIOA including, but not limited to, the implementation of the Career Pathways Model;

The Mountain State Educational Services Cooperative (MSESC) is the regional Provider of Adult Education and Literacy services. Adult Education Staff is co-located at the American Job Center in Wheeling and is available on an as-needed basis at the other American Job Centers in the region. The NPWDB, Inc. has had a long standing, effective working relationship with MSESC, and RESA 6 before that, for a number of years. They facilitate education services and provide basic Literacy and Adult Education Services to those in need of their services. MSESC partners with the NPWDB, Inc. in the development and delivery of Career Pathways Bridge and Pre-Bridge Programs in "high demand" sectors. They also: Assess the Adult Education and Literacy needs of customers at American Job Centers, and other points of service, and accept appropriate referrals for services; Conduct outreach, intake and orientation services; Provide academic support to Adults who are preparing for the High School Equivalency Test (HiSet), post-secondary transition or other secondary level credential options; Provide English for Speakers and other Language Instruction Services; Assist the NPWDB, Inc. with providing Customized Training for employers; Provide technology training that combines workplace training with related technology instruction which may include cooperative education and result in eligibility for an industry standard credential; and, Collect participant data and complete progress reports that are then relayed to other Core and Required Partners. Roles and responsibilities for Adult Education and Literacy activities are outlined in the Memorandum of Understanding (MOU). A representative from MSESC serves on the Board of Directors, the Business Services Team (BST) and the Business Resource Network (BRN). MSESC Staff provided input on this Local Plan and collaborated with the NPWDB, Inc., Core and Required Partners in the development and implementation of a regional Strategic Plan that is aligned with the Workforce Innovation & Opportunity Act (WIOA) regulations and the Board of Director's goals. The Strategic Planning in Occupational Knowledge for Employment and Success (SPOKES) Program, which was created by the West Virginia Department of Education's (WVDOE's) Office of Adult Education, is offered by MSESC at various locations throughout the region.

B) A Description of how the Local Board will coordinate Efforts with Title II Providers to align Basic Skills and English Language Assessment. The Description should include:

- 1. An Outline of the agreed upon Steps that will be taken to align Basic Education Skills and English Language Assessment within the Local Area, including, but not limited to, any Memorandum of Understanding entered into by the Workforce Development and Adult Learning Partners;**

An outline of agreed upon steps taken to align Adult Education skills and English language assessments in the region is included in the Memorandum of Understanding (MOU) between the NPWDB, Inc. and the Mountain State Educational Services Cooperative (MSESC), the provider of Adult Education (AE) and Literacy activities in the region. MSESC provides assessment and instructional services in academic and life skills and English language skills. In an effort to align assessments, the NPWDB, Inc. and Core Partners ensure the Test for Adult Basic Education (TABE) is administered to participants in need of skills remediation. MSESC is charged with the sole responsibility of conducting English language assessments for those participants in need of this type of assessment on behalf of the NPWDB, Inc. and other Core and Required Partners. Using common standardized assessment tools facilitates accurate information sharing among the NPWDB, Inc., Core and Required Partners.

2. An Identification of how Assessment Scores will be shared among WIOA Title I Areas and Title II Providers in consideration of the Federal Education Rights and Privacy Act (FERPA);

A universal Referral Form was developed and includes basic demographic information and participant assessment scores. An Information Release Statement is included in the Referral Form and signed by participants giving us authority to share their information and assessment scores. The Referral Form is sent to the contact person(s) for the Job Center Operator, Core and Required Partners. Information contained in the Referral Form is also entered into the Mid-Atlantic Career Consortium (MACC) system by the appropriate stakeholder. Job Center Operator, Core and Required Partners use the MACC system to gain access to pertinent participant information.

3. An Identification of who will conduct which of the approved Assessments (including Trade Participants), and when such Assessments will be conducted, consistent with this Policy;

In addition to Mountain State Educational Services Cooperative (MSESC) administering the Test for Adult Basic Education (TABE) test to participants, Job Center Operator Staff are trained to administer the TABE test to participants as well (The Test for Adult Basic Education (TABE) is used to assess all participants at American Job Centers). Wagner-Peyser Staff administers the TABE test to Trade participants. The West Virginia Division of Rehabilitation Services (WVDRS) administers specific assessments to individuals with disabilities. Once a participant decides on a training of his/her choice, the Training Provider may require other specific assessments which they will be responsible for administering.

4. An Outline of how the Local Area will coordinate Testing between Workforce Development and Adult Education Providers; and,

Job Center Operator Staff assesses participants who are eligible for participation in Workforce Innovation & Opportunity Act (WIOA) funded programs and services. If participants are identified as lacking a high school diploma or English language proficiency, they are referred to Mountain State Educational Services Cooperative (MSESC) for appropriate services. Referrals are made to and from MSESC as appropriate.

5. An Outline of how the Local Area will ensure that Test Administrators are trained in accordance with the Policy and applicable Testing Guidelines as set forth by the applicable Test Publisher.

Job Center Operator and Mountain State Educational Services Cooperative (MSESC). Staff are responsible for training Core Partners to use the Test of Adult Basic Education (TABE) test as an assessment tool.

C) A Description of how the Local Board will ensure that the Individual appointed to represent Title II Services on the Board will coordinate with all Title II Grant Administration in the Local Area in an Uniform, Regular and Consistent Manner;

Providers of Title II Services are represented on the Board of Directors and are members on some of the Board's Sub-Committees, like, the One Stop Committee and the Youth Committee.

D) A Description of how Adult Education Services will be provided in the American Job Center System within the Local Area.

Adult Education (AE) services are provided at the American Job Center in Wheeling on a daily basis and at the other American Job Centers in the region on an as-needed basis.



SECTION 7: VOCATIONAL REHABILITATION FUNCTIONS

A) A Description of the Cooperative Agreements between the Local Board or other Local Entities described in Section 101(a)(11) (B) of the Rehabilitation Act of 1973 and the Local Office of a designated State Agency or designated State unit administering Programs carried out under Title I of such Act and subject to Section 121(f) in accordance with Section 1010(a)(11) of such Act 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;

The NPWDB, Inc. partners with the West Virginia Division of Rehabilitation Services (WVDRS), a Core Partner, to further enhance the delivery of services for individuals with disabilities. This working relationship is formalized through a Memorandum of Understanding (MOU) between the NPWDB, Inc. and the WVDRS. A WVDRS representative serves on the Board of Directors and its Sub-Committee – The Committee to Assist Individuals with Disabilities. WVDRS is an active partner at regional American Job Centers. A WVDRS representative is a key member of the American Job Center's Business Services Team (BST). WVDRS Staff provided input on this Local Plan and collaborated with the NPWDB, Inc., Core and Required Partners in the development and implementation of a regional Strategic Plan that is aligned with Workforce Innovation & Opportunity Act (WIOA) regulations and the Board of Director's goals. Some of the services the WVDRS provides to individuals with disabilities are: Intake and Orientation; A comprehensive assessment; Development of Individual Employment Plan for participants; Guidance and counseling; Follow-Up services; and, Supportive Services. Programs and devices for individuals with disabilities are coordinated through regular cross-training sessions of Job Center Operator, Core and Required Partner Staff. WVDRS Staff provides Job Center Operator, Core and Required Partner Staff with ongoing training on American with Disabilities Act (ADA) compliancy, Tele-printer (TTY), benefits, counseling and disability awareness and sensibility, programmatic and physical accessibility, serving individuals with disabilities that require Supportive Services, disability etiquette, sensitivity training and assistive technology. WVDRS Staff also provides specialized technical assistance, to Job Center Operator Staff, Core and Required Partner Staff when needed and on an individualized basis. As a result, Job Center Operator, Core and Required Partner Staff is better able to identify advanced opportunities for individuals with disabilities as well as the possibility for co-enrollment.

In order to meet business needs and expectation of current and future workers, WVDRS Staff gathers and collects information about employer needs, which is shared with the NPWDB, Inc. and other Core and Required Partners to optimize its coordination with employers to identify competitive integrated employment and career exploration opportunities for individuals with disabilities. WVDRS Staff takes a multi-faceted approach. They use their own personnel in addition to partnering with local Workforce Development Board like the NPWDB, Inc. to coordinate with employers across the State. The WVDRS has specific program and strategies to identify employment and career

exploration opportunities for individuals with disabilities. The Employer Services section of WVDRS specializes in providing employers with disabilities- related information, services and pre-screened job seekers. Employers are provided with business options and assistance in: Staffing; Employee retention strategies; Education on disability-related issues; Job accommodations; and, Information about financial incentives for employers who hire individuals with disabilities. WVDRS Staff provides the following additional services to employers: Consultation and training for potential employees who have a disability; Technical assistance on ADA; Accessibility options and solutions; Employer on-site disability awareness training; and, Information on tax credits available to participating employers. Direct contact with employers is key to identifying competitive integrated employment and career exploration opportunities for individuals with disabilities. WVDRS Staff uses labor market data to identify employers in “high demand” industries. WorkForce West Virginia has a large database of both job seekers and job openings in the State. The NPWDB, Inc., Core and Required Partners are able to tap into this database to identify statewide employment opportunities for individuals with disabilities.

B) A Description of how Individuals with Disabilities will be serviced through the American Job Center System in the Local Area.

Adaptable equipment and software are already in place and ready for use at regional American Job Centers. Through a Memorandum of Understanding (MOU) with the West Virginia Division of Rehabilitation Services (WVDRS), individuals that need specialized equipment not available at American Job Centers are referred to the WVDRS. Youth with disabilities are encouraged to participate in Youth Programs and Services. The universal Participant Referral Form being developed for use between the NPWDB, Inc., Core and Required Partners will enable individuals, in particular those with disabilities, to connect with the Programs and Services they need. The goal is to ensure that information and services provided at American Job Centers are readily accessible to this target group.



SECTION 8: JOBS FOR VETERANS STATE GRANT FUNCTIONS

A) A Description of how the Local Board will provide Priority of Service to Veterans and their eligible Spouses;

Priority of services will be afforded to Veterans and their eligible Spouses at the point of entry to the local workforce development system. They will be made aware of the full array of employment and Training Programs and Services available to them. Veterans and their eligible Spouses who are determined to have barriers to employment will be referred to appropriate Wagner-Peyser Staff for intensive case management services. Wagner-Peyser Staff will work closely with Veterans and/or their eligible Spouses to identify and remove any barriers to employment to ensure they have the skills necessary to meet the demand of area businesses. The referral of a Veteran, and their eligible Spouses, who has been determined to have a significant barrier to employment, should be made to appropriate Wagner-Peyser Staff. Wagner-Peyser Staff will further assess eligibility for Disabled Veteran Outreach Program services. The NPWDB, Inc. will work diligently to increase access to career services and Work-Based Training Programs for Veterans and their eligible Spouses. We will work to increase employer use of Work-Based Training Programs as an incentive for them to hire Veterans or their eligible Spouses.

B) A Description of how the Local Board will engage the Local "Veterans Employment Representative" in providing Services to Local Businesses.

The local WorkForce West Virginia Employer Services Representative works specifically with area businesses. This staff member also serves as a member of the Business Services Team (BST).



SECTION 9: FISCAL, PERFORMANCE AND OTHER FUNCTIONS

A) An Identification of the Entity responsible for the Disbursal of Grant Funds described in Section 107(d)(12)(B)(I)(III) as determined by the Chief Elected Official or the Governor under Section 107(d)(12)(B)(i);

As determined by the Local Elected Official (LEO) consortium, NPWDB, Inc. Administrative Staff serves as the fiscal agent, as well as the grant recipient, for the receipt and distribution of Workforce Innovation & Opportunity Act (WIOA) funds in the region in accordance with WIOA regulations. Practices and procedures implemented within the internal financial system employ a checks and balances system to ensure continuous accountability of WIOA funds and property. Funds are used solely for WIOA purposes. All financial information is kept on site at the NPWDB, Inc. Office. Federal and State oversight entities can readily access financial information as needed and necessary.

B) A Description of Financial Sustainability of the American Job Center Services with Current Funding Levels, and a Description of the Ability to make Adjustments should Funding Levels change;

Workforce Innovation & Opportunity Act (WIOA) allocation formulas are used by the Governor of West Virginia to determine local workforce development systems' funding amounts and play a significant role in the sustainability of American Job Centers. American Job Center operations are funded with WIOA Title I funds provided by the NPWDB, Inc. and some Core and Required Partners. Non-WIOA funds provided by some Required and Non-Required Partners also help fund operations at regional American Job Centers. An Infrastructure Agreement for regional American Job Centers was developed by the NPWDB, Inc., Core, Required and Non-Required Partners. The CAP details the amount of total funds needed to sustain American Job Center operations and how funds contributed by Core, Required and Non-Required Partner are distributed. The CAP is approved annually by a majority of Core and Required Partners. The NPWDB, Inc. evaluates the sustainability of American Job Centers no less than two (2) times per program year through fiscal monitoring reviews. This review provides the NPWDB, Inc. with the opportunity to determine if any adjustments need to be made to American Job Centers' budgets. American Job Centers depend on all Partners collaborating and working together to sustain it.

C) A Description of the Competitive Process to be used to award the Sub-Grants and Contracts in the Local Area for Activities carried out under this Title including Risk Assessment of potential Sub-Grantees and Contracts;

PROCESS TO AWARD FUNDS – GOODS AND SERVICES

The NPWDB, Inc. adopted a procurement policy that is compliant with the Uniform Code and State policies. Additionally, procedures and practices were developed in accordance with Workforce Innovation & Opportunity Act (WIOA) requirements, as well as U.S. Department of Labor guidelines, to oversee the procurement, control and disposition of

property. Sub-Grantees and Contractors purchasing property with WIOA funds will contractually be required to adhere to the same WIOA and U.S. Department of Labor guidelines for the purchase and management of property. The Property Officer completes a Supply Request Form detailing supplies needed by Staff on an as-needed basis. The Executive Director, or Assistant Director, must sign the Supply Request Form, indicating approval, before any purchases can be made. NPWDB, Inc. Staff will purchase only American-made equipment and products whenever possible. Purchases of supplies or one (1) time services of less than \$3000 may be made at the discretion of the Executive Director, or Assistant Director, without competitive quotations but should be distributed equitably among qualified suppliers. Fixed price type contracts such as office cleaning, printing of contracts, etc. are procured on a competitive proposal basis of written quotations electronically and by direct mailings. Risk assessment factors are detailed in the proposal to ensure adequate delivery of services and high quality of supplies. No less than annually, an inventory will be taken of all equipment and property, including hardware and software. At least three (3) quotations should be obtained if possible. If a sole source contract is awarded by the NPWDB, Inc. one (1) or more of the following conditions have occurred: There is prior approval from the federal awarding agency or pass-through entity; The item or service is available only from one (1) source; a public exigency or emergency exists; or, Competition was determined to be inadequate. If there is a supplier or Service Provider who has previously exhibited a pattern of failing to provide high quality supplies or adequate services, the NPWDB, Inc. will not contract with that supplier or Service Provider in the future.

PROCESS TO AWARD FUNDS - ADULT AND DISLOCATED WORKER SERVICES

The NPWDB, Inc. competitively and openly solicits bids for programs and/or services via a Request for Proposal (RFP) process electronically and by direct mailings.¹ The Board of Director's One Stop Committee, with assistance from NPWDB, Inc. Staff, is responsible for reviewing RFPs received and making recommendations for funding to the Board of Directors. The criteria for an award of funding is based on: Past performance, if applicable; Cost effectiveness; Program Design; Demonstrated need for a particular type of "high demand" training; Demonstrated overall program effectiveness; Group(s) targeted for services; Placement and retention efforts; Ability of the eligible Provider(s) to meet performance goals; and, the ability to meet administrative; and, Fiscal grant responsibilities. A Program Evaluation Form is used to rate complete RFPs. Evaluation Forms are scored, averaged and totaled. The One Stop Committee then provides their recommendation(s) to the Board of Directors, which includes a proposed level of funding, among other things. The Board of Directors has final approval of all Contracts awarded to an eligible Provider(s). If a Provider is not awarded funds, the bidder is provided an opportunity to appeal the Board of Director's decision in accordance with the RFP. The NPWDB, Inc. uses a performance-based contracting method with eligible Provider(s).

PROCESS TO AWARD FUNDS - YOUTH PROGRAMS AND SERVICES

About every three (3) program years, the Board of Directors, on the recommendation of its Youth Committee, competitively and openly solicits a Sub-Grantee(s) to deliver Youth Programs and Services to In-School and Out-of-School Youth via a Request for Proposal (RFP) process.² The successful Bidder(s) must provide Youth Programs and Services in all six (6) counties in the region. Solicitation of a Sub-Grantee(s) is done on a competitive

basis electronically and by direct mailings. The Youth Committee, with assistance from NPWDB, Inc. Staff, is responsible for reviewing RFPs received and making recommendations for funding to the Board of Directors. The criteria for an award of funding is based on: Past performance, if applicable; Cost effectiveness; Demonstrated overall program effectiveness; Youth group(s) targeted for services; Placement and retention efforts in offered education or employment programs; Ability of the Sub-Grantee(s) to meet performance goals with prior grant funding; Level of customer satisfaction with past programs; Ability to meet administrative and fiscal grant responsibilities; The ability to provide an objective assessment of academic levels skills levels and service needs of Youth Participants; Effective delivery of high quality Career Pathways services that include education and employment goals; The delivery of activities that lead to attainment of a secondary school diploma or its recognized evaluation; Preparation for post-secondary education and training; The delivery of Programs and Services that provide strong links between academic and occupational education preparation for unsubsidized employment and effective connections to employment; and, The ability to effectively deliver the fourteen (14) program elements identified in WIOA. A Program Evaluation Form is used to rate complete RFPs. Evaluation Forms are scored, averaged and totaled. The Youth Committee then provides their recommendation(s) to the Board of Directors, which includes a proposed level of funding. The Board of Directors has final approval of all contracts awarded to Sub-Grantee(s).

Youth Services Systems, Inc. (YSS, Inc.), has delivered Youth Programs and Services in the region for the past ten (10) program years. YSS, Inc. has continually met and/or exceeded performance measures. YSS, Inc. Staff is housed at regional American Job Centers to ensure Youth have easy access to available WIOA Title I Youth Workforce Investment Activities. YSS, Inc. offers on and off-site program programs, services and activities on a daily basis at regional American Job Centers. Services include: Improving educational achievement of Youth; Preparing Youth for success in employment; Supporting Youth during and after services; and, Developing Youths' potential to become productive citizens and leaders. Youth services are aligned with the vision and goals of the WIOA and the WorkForce West Virginia Office. Youth services are provided in an efficient, cost-effective manner. If a Sub-Grantee(s) is not awarded funds, the Sub-Grantee is provided an opportunity to appeal the Board of Director's decision in accordance with the RFP. The NPWDB, Inc. uses a performance-based contracting method with Sub-Grantees, like YSS, Inc.

D) A Description of the Local Levels of Performance negotiated with the Governor and Chief Elected Official pursuant to Section 116 (c) 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 Subtitle B and the American Job Center Delivery System in the Local Area;

The Workforce Innovation & Opportunity Act (WIOA) creates a single set of performance measures for Adults across all Core Programs, including occupational training and Adult Education programs and a similar set of performance measures across all Youth Programs and Services. Negotiated performance levels provide a means for the public to assess how effectively the local workforce development system is in providing high

quality Programs and Services to customers and helping unemployed individuals find family-sustaining employment in “high demand” occupations. Negotiated levels of performance take into account challenges in serving certain target groups and account for the number of participants steered toward Career Pathways. Levels of performance include a set of goals for Adults, Dislocated Workers and Youth in terms of: Employment; Median earnings; Credential attainment rate; and, Measurable skill gains. The NPWDB, Inc. and Core Partners are committed to meeting and/or exceeding assigned performance levels by establishing a highly functioning local workforce development system. The NPWDB, Inc. adheres to established performance measures for Core Programs as a way to support greater integration of services. More coordinated data sharing enables the NPWDB, Inc. to accurately evaluate program performance to ensure the Employment and Training Programs we are funding actually work. Meeting and/or exceeding negotiated performance levels helps ensure more Adult and Dislocated Worker job seekers are placed in Career Pathways and related employment while earning a family-sustaining wage. Youth Participant without a High School Equivalency Test (HiSet) or high school diploma are required to obtain targeted credentials while working in Occupational Skills Training. Negotiated performance levels illustrates a commitment in serving individuals with barriers to employment. The NPWDB, Inc. works with Core Partners to improve data sharing, including data from unemployment insurance wage records. The NPWDB, Inc. tracks the number of individuals with barriers to employment served by each core program, with specific breakdowns by sub-population, on a quarterly basis throughout the program year. The NPWDB, Inc. also reports the number of individuals with barriers to employment that are served in the Adult and Dislocated Worker program, with specific breakdowns by subpopulations, race ethnicity, sex and age on quarterly basis.

Negotiated Program Year 2020 - 2021 levels of performance for the local workforce development system are:

WIOA ADULT	PY 20	PY 21
Employment (Q2 Post Exit)	69.3%	69.3%
Employment (Q4 Post Exit)	69.6%	69.6%
Median Earnings	\$6,251.00	\$6,251.00
Credential Rate	78.0%	78.0%
Measurable Skill Gain	28.0%	33.0%
Customer/Employer Satisfaction	80.0%	80.0%
WIOA DISLOCATED WORKER		
Employment (Q2 Post Exit)	81.2%	81.2%
Employment (Q4 Post Exit)	83.2%	83.2%
Median Earnings	\$9,719.00	\$9,719.00
Credential Rate	83.0%	83.0%
Measurable Skills Gain	27.5%	35.0%
Customer Employer Satisfaction	80.0%	80.0%
WIOA YOUTH		
Placement in Employment, Education, Training (Q2 Post Exit)	63.3%	63.3%
Placement in Employment, Education, Training (Q4 Post Exit)	69.7%	69.7%
Median Earnings	\$3,182.00	\$3,182.00
Credential Rate	73.3%	73.3%
Measurable Skills Gain	34.4%	34.4%
Registration at Local American Job Centers	100%	100%
Employment Preparation (for Region 5 Youth Provider Subcontractor(s))	70.0%	70.0%
LABOR EXCHANGE		
Employment (Q2 Post Exit)	61.0%	61.0%
Employment (Q4 Post Exit)	62.5%	64.0%
Median Earnings	\$5,093.00	\$5,093.00

E) A Description of the Actions the Local Board will take toward becoming or remaining a High Performing Board. This should include a Description of the Process used by the Local Board to review and evaluate Performance of the Local American Job Center(s) and the One Stop Operator;

The NPWDB, Inc. has a history of: Providing strategic leadership; Maintaining fiscal and programmatic accountability; and, Good performance. The NPWDB, Inc. has the ability to align Programs and Services to execute effective solutions and address local, State and federal priorities. The NPWDB, Inc. refers to federal performance measures to evaluate performance of Sub-Grantees, contractors, the Job Center Operator and American Job

Centers no less than twice each program year. Monitoring performance measures this frequently will allow us an opportunity to correct any performance deficiencies promptly. The NPWDB, Inc. works closely with the WorkForce West Virginia Office to track performance measures on a quarterly basis. The NPWDB, Inc. uses only performance-based contractual agreements. The NPWDB, Inc. and its Core and Required Partners developed a Strategic Plan for the region that focuses on: Staff and partner capacity building; Financial stability; Developing strategic partnerships; Maintaining current labor market information; and, Initiating effective community and employer outreach efforts. NPWDB, Inc., Job Center Operator, Core and Required Partner Staff are encouraged to participate in offered training, like; training that focuses on meeting performance measures and professional development training. The local workforce development system is evaluated no less than annually to ensure high performance. If any deficiencies are noted, they are addressed swiftly.

F) A Description, including a Copy of the Local Area's Individual Training Account Policy. The Description should include Information such as Selection Process, Dollar Limits, Duration;

Individual Training Accounts (ITAs) are used as a mechanism for providing Workforce Innovation & Opportunity Act (WIOA) eligible Adults, Dislocated Workers and Older Youth, ages 18-24. ITAs empower individuals through: Comprehensive assessment and evaluation of skills; Aptitudes; Abilities, and, Values. ITAs allow participants to acquire marketable skills in "high demand" industries to successfully enter or re-enter the workforce at family-sustaining wages. Individuals in need of training are provided with an in-depth orientation that introduces them to the ITA policies and procedures and the application requirements. Older Youth, ages 18 and up, may be enrolled in the ITA Program using Adult Funds. To be eligible to receive ITA funding, an individual must be determined WIOA eligible. In order for an individual to secure ITA funding for a college level training program, the individual must have a score of at least a twelfth (12th) grade level in two (2) out of three (3) areas of Reading, Math, and/or English on a generally accepted standardized test approved for use in the region. The NPWDB, Inc. uses the Test of Adult Basic Education (TABE) and the Career Plan Development Manual to assess Adults, Dislocated Workers and Older Youth. The cost limit for an ITA under WIOA funding is five thousand five hundred dollars (\$5,500) per program year per ITA participant, not to exceed eleven thousand dollars (\$11,000) for a maximum period of two (2) program years.

G) A Description of how Training Services under Chapter 3 of Subtitle B will be provided in accordance with Section 134 (c) (3) (G), including, if Contracts for the Training Services will be used, how the use of such Contracts will be coordinated with the use of Individual Training Accounts under that Chapter and 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;

Training is made available to those customers in need of training services in order to obtain or regain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment. A training priority is to support programs that lead to recognized post-secondary credentials aligned with "high

demand” industry sectors in the region. In any case, training services selected must be directly linked to “high demand” employment opportunities in the local area or the region, or in another area where the Adult or Dislocated Worker is willing to commute or relocate. Training services are made available to eligible individuals who have been determined in need of training services through assessment or evaluation and through the delivery of career planning services. The NPWDB, Inc. continues to use Individual Training Accounts (ITAs) which maximized customer choice. Customers are provided with a copy of the Eligible Training Provider List (ETPL) and are given guidance about the quality and performance of Training Providers to help them make an informed decision about an appropriate Training Provider. After the customer reviews the data and makes his/her selection of a Training Provider, the customer is provided with a referral to that Training Provider. In addition to ITAs, other types of training services that may be provided to eligible individuals are: Occupational Skills Training, including training for non-traditional occupations; On-The-Job Training (OJT), Incumbent Worker Training; Skills Upgrade and Retraining; Job Readiness Training; Adult Education and Literacy Activities; and, Customized Training. The NPWDB, Inc. may also decide to select a training program(s) of demonstrated effectiveness offered in the region by a community-based organization or another private organization to serve eligible individuals with barriers to employment. If the NPWDB, Inc. decides to do this, it will be done on a competitive Request for Proposal (RFP) basis and the training program(s) chosen for funding will be required to enter into a performance-based agreement with the NPWDB, Inc.

H) A Description of the Process used by the Local Board, consistent with Subsection (d), to provide an Opportunity for Public Comment, including Comment by Representatives of Business and Comment by Representatives of Labor Organizations and input in the Development of the Local Plan, prior to Submission of the Plan;

The NPWDB, Inc. released a draft of the Local Plan modification on April 26, 2022, making it available for a fourteen (14) day public comment period.³ The draft modified Local Plan was announced on the NPWDB, Inc. website and in local print media. A hard copy of the draft modified Local Plan will be made available at the NPWDB, Inc. Office, 1245 Warwood Avenue, Wheeling, WV. An electronic notification or hard copy notification of the draft modified Local Plan was sent to NPWDB, Inc. stakeholders, including the Board of Directors, Local Elected Officials (LEOs), Core and Required Partners, area employers, labor unions, Training Providers and community-based organizations. There were no public comments received to the draft modified Local Plan. A copy of the final version of the modified Local Plan will again be made available for another fourteen (14) day public comment period using the same practices that were used when advertising the draft modified Local Plan. If any comments are received during the public comment period, the NPWDB, Inc. will address them promptly, including those comments that are in disagreement, and include them with the final version of the modified Local Plan. The Local Plan covers the period July 1, 2020 – June 30, 2024. The Local Plan is approved by the region’s Chief Local Elected Official and the Board of Directors. The NPWDB, Inc., Core and Required Partners expect to continually update the Local Plan to respond to the regional economy at any given time.

I) A Description of how the American Job Centers are utilizing the MACC as the Integrated, Technology-Enabled Intake and Case Management Information System for Programs carried out under WIOA and Programs carried out by American Job Center Partners;

The NPWDB, Inc., Core and Required Partners provide customer service through a common data base – the Mid-Atlantic Career Consortium (MACC) system. When a customer accesses the local workforce development system, Job Center Operator Staff assists him/her with identifying goals and the service needed to achieve desired goals. Job Center Operator Staff provides intake, registration, skill assessment and an initial needs assessment. Job Center Operator Staff is trained to identify services needed for the customer and the appropriate Core and/ or Required Partner(s) he/she will be referred to. Any participant data collected during the intake and initial service delivery is entered into the MACC system. This action results in integrated data collection that Core and Required Partners can access and view. Participant referrals will not require a separate intake process since Core and Required Partner Staff are co-located at American Job Centers and because of the shared database. In many cases, customers won't even be aware that they have been transferred from one (1) program to another. The same holds true when customers are receiving services simultaneously. In these cases, transfers are made and services are provided uninterrupted. Employers can have access to the MACC system to do self-postings of job openings and view job seeker searches. The NPWDB, Inc. and WorkForce West Virginia's websites can also be accessed by job seeking customers and employers.

J) A Description of the Local Board's Procedures for conducting Oversight and Monitoring of its WIOA Activities and those of its Sub-Grantees and Contractors. The Monitoring Plan shall address the Monitoring Scope and Frequency and shall include the following:

1. The Roles and Responsibility of Staff facilitating this Procedure;

Monitoring reviews are conducted by NPWDB, Inc. Staff, on behalf of the Board of Directors. Appropriate Board of Director's Sub-Committees, through NPWDB, Inc. Staff, are responsible for reviewing overall performance of Sub-Grantees and Contractors. The Assistant Director is responsible for monitoring Adult and Dislocated Worker Training Programs and Services and American Job Center programmatic operations; The Program Coordinator and the Assistant Director is responsible for monitoring Youth Programs and Services; and, The MACC Coordinator is responsible for monitoring the performance levels of Adult, Dislocated Worker and Youth Training Programs and Services, as well as the performance levels of regional American Job Centers. The Executive Director reviews and approves results detailed in all monitoring reports.

2. A Requirement that all Sub-Grantee Agreements and Contracts be monitored at least annually;

There is at least two (2) announced monitoring reviews performed each program year for every contracted Sub-Grantee and/or Contractor. Should any deficiencies

or problems be identified, additional monitoring reviews, both announced and unannounced, are conducted throughout the program year.

3. Procedures for determining that Expenditures have been made against the Cost Categories and within the Cost Limitation specified in the Act and WIOA Regulations;

A fiscal review occurs every time a payment is made to a Sub-Grantee or Contractor. Expenses are immediately compared to the approved budget(s) before any payments are made. All costs are evaluated to determine whether they are in compliance with applicable Workforce Innovation & Opportunity Act (WIOA) rules and regulations, as well as with the NPWDB, Inc. fiscal policies and procedures. Supporting document must accompany each invoice, Individual Training Account (ITA) or participant timesheet to ensure accuracy and compliance. The Fiscal Officer and Assistant Director reviews and approves all requests for payment prior to submission to the Executive Director. The Executive Director is responsible for final approval of all payments to be made. If any discrepancies are noted, they will be addressed and resolved prior to compensation. Sub-Grantees and Contractors will submit monthly financial reports to the NPWDB, Inc. where expenditures will be compared against funding stream and line item as detailed and approved in the contractual agreement or financial arrangement. The Executive Director reviews internal fiscal reports prepared by the Fiscal Officer on a monthly basis. Any problems identified are corrected immediately. The Treasurer of the Board of Directors and the Executive Committee review fiscal reports on a monthly basis. Mid-Atlantic Career Consortium (MACC) generated fiscal reports reflecting expenditures each quarter are prepared by the Subcontracting Accountant, Fiscal Officer and the Assistant Director. Any other fiscal reports required by WorkForce West Virginia Office are completed using the MACC system.

4. Procedures for determining Compliance with other Provisions of the Act and Regulations and other Applicable Laws and Regulations, including the Methods of Monitoring to be used for Sub-Grantees and Contractors;

The following activities are monitored, as applicable, through onsite visits, desk reviews, data collection, file reviews, policies reviews, or a combination of activities:

- a) Program Goals and Objectives;
- b) Program Quality;
- c) Procurement;
- d) Fiscal Accountability;
- e) Labor Standard;
- f) Audit/Audit Resolution;
- g) Actual Expenditures;
- h) Grievance Procedures;
- i) Equal Opportunity;
- j) Expenditures against Cost Categories and Limitations;
- k) Provisions of the American with Disabilities Act (ADA);
- l) Property Management;

- m) Internal Monitoring;
- n) Administration Procedures;
- o) Program Performance;
- p) Program Accountability;
- q) Eligibility Verification; and,
- r) Other Activities as determined by the Board of Directors.

The NPWDB, Inc. provides advance notification to Sub-Grantees and Contractors prior to monitoring reviews. Unannounced visits are made to Sub-Grantees and Contractors when there is a reason to believe such visits are necessary. A Desk Monitoring Report is used for desk reviews to ensure all pertinent records and information is documented. Data is collected, reviewed and analyzed for all grant-related activities. A desk review includes: Fiscal; Programmatic; and, General compliance. An Onsite Monitoring Report will be used for onsite visits to ensure that pertinent data is being collected, reviewed and analyzed. The Report includes: Administrative; Fiscal; Programmatic; and, General compliance. Additionally, Monitoring Reports will include: The dates of the review and areas covered; A listing of findings, if applicable; A description of the findings or violation, if applicable; and, Recommendations for each finding which will set forth the most appropriate action to correct the deficiencies or violation noted, if applicable; and, A Signature Page signed by NPWDB, Inc. Staff conducting the review, the Sub-Grantee's or Contractor's representative and the Executive Director. All findings resulting from a monitoring review are clearly documented in the Monitoring Report. The documentation includes a description of the specific violation or finding of federal, State laws, policies, regulations or contractual provisions. Monitoring Reports are prepared and provided to Sub-Grantees or Contractors within fifteen (15) working days of the actual review.

Because federal funding is being used, comprehensive monitoring reviews are necessary to ensure that program operations and expenditures are within the guidelines established by federal, State cognizant agencies and the NPWDB, Inc. The monitoring review process allows the NPWDB, Inc. to know what is happening at any given time during a program year and can provide "warning signals" that a deficiency or problem may be developing so that improvement measures or corrective action can be taken swiftly. One of the reasons for the strong emphasis on monitoring is to assist in reducing the possibility of audit exceptions, sanctions, and/or unallowable costs. Through the use of the region's Monitoring Procedures Manual, the NPWDB, Inc. minimizes problems through early detection and correction. In addition to monitoring reviews that are conducted by the NPWDB, Inc., Workforce West Virginia Office and U.S. Department of Labor Staff and other authorized federal authorities or their agents may also conduct monitoring reviews.

5. Provisions for the Recording of Findings made by the Recipients' Monitor(s), the forwarding of such Findings to the Sub-Grantee or Contractor for Response and the Recording of all Corrective Actions;

The analysis of deficiencies and problems usually occurs after the fact. The Monitor(s) observes conditions and performance issues caused by events that

have already occurred. The process of correcting deficiencies or problems is proactive and future-oriented. Findings and any deficiencies realized during the monitoring review will be documented in the Monitoring Review Report. Findings and deficiencies are discussed with a representative of the Sub-Grantee or Contractor during the exit conference. The representative is provided with a copy of the Monitoring Review Report which will detail findings and deficiencies. Depending on the nature and seriousness of deficiencies or problems, the Monitor(s) may request the Sub-Grantee or Contractor develop and submit a Corrective Action Plan to the NPWDB, Inc. for review and comment within seven (7) working days from receipt of the Monitoring Review Report.

The Corrective Action Plan specifically describes the steps and actions that will be put in place to ensure that any noted deficiencies or problems are corrected promptly. Objectives are included in the Corrective Action Plan with specific mention to what is to be done, by whom, how, when, etc. Options may also be mentioned in the Corrective Action Plan providing alternative approaches in resolving any noted deficiencies and problems. The NPWDB, Inc. has seven (7) working days to accept or reject the submitted Corrective Plan of Action. If the Corrective Action Plan is accepted and approved by the NPWDB, Inc., the Monitor(s) will conduct more frequent, special monitoring reviews to ensure continued and ongoing resolution of noted deficiencies or problems. Implementation of corrective action will be closely followed-up on by the Monitor(s) to determine to ensure deficiencies and problems have been rectified timely, efficiently and effectively. Failure to respond within seven (7) working days with a Corrective Action Plan or rejection of the Corrective Action Plan by the NPWDB, Inc. warrants a termination notice which becomes effective thirty (30) working days after receipt of the Corrective Action Plan. After termination results, the NPWDB, Inc. is only liable for appropriate payments of services rendered prior to the termination date. Follow-up monitoring reviews will be determined by the nature of the finding(s) and the Sub-Grantee's or Contractor's response. A follow-up monitoring review may be an onsite review, a desk review or a combination of both.

6. Provisions of Technical Assistance as Necessary and Appropriate; and,

Technical Assistance is formal or informal training provided to Sub-Grantees and Contractors by Staff Monitors. It can be provided in conjunction with monitoring reviews or independently. Technical assistance is typically provided to strengthen overall program performance, as well as to prevent weaknesses from becoming problem areas that require correction at a later time. It may be as simple as identifying a lack of a procedure or an inappropriate procedure which, if continued, will result in deficiencies or problems. Technical Assistance will automatically be provided by Monitors at the start of a contractual agreement period. Thereafter, technical assistance is provided by Monitors as requested and needed or if Monitors feels there is a significant need for additional technical assistance.

7. Specific Local Policies developed by the Local Board for

Oversight of the American Job Center System, Youth Activities and Employment and Training Activities under Title I of WIOA.

In accordance with the NPWDB, Inc.'s Monitoring Procedures Manual, it is the responsibility of our Monitors to ensure that terms, conditions, policies and procedures of all contractual agreements and financial arrangement in place are being adhered to at all times by Job Center Operator Staff, Sub-Grantee and/or Contractors. Job Center Operator Staff, Sub-Grantees and/or Contractors are expected to adhere to established federal and State policies, procedures, rules, regulations, etc. at all times while doing business with the NPWDB, Inc. Since Workforce Innovation & Opportunity Act (WIOA) funds are being used, comprehensive oversight and monitoring reviews are necessary to ensure that program operations and expenditures are within the guidelines established by federal, State cognizant agencies and the NPWDB, Inc. The oversight and monitoring review process allows the NPWDB, Inc. to know what is happening at any given time during a program year and can provide "warning signals" that a deficiency and/or problem may be developing so that improvement measures or corrective action can be taken swiftly. Subsequently, the reason for the emphasis on monitoring is to assist in reducing the possibility of audit exceptions, sanctions, and/or unallowable costs. Through the use of the Monitoring Procedures Manual, the NPWDB, Inc. minimizes problems through early detection and correction. The American Job Center system, Sub-Grantees or Contractors of Youth Programs and Services and employment and training activities under Title I of the WIOA are monitored by NPWDB, Inc. Staff no less than twice a program year in accordance with the NPWDB, Inc. Monitoring Procedures Manual.

Contractual agreements or financial arrangements in place with these entities state that regular monitoring reviews will be conducted via onsite visits only. In accordance with the NPWDB, Inc. Monitoring Procedures Manual, activities to be monitored include: Program Goals and Objectives; Program Quality; Procurement; Fiscal Accountability; Labor Standard; Audit/Audit Resolution; Actual Expenditures; Grievance Procedures; Equal Opportunity; Expenditures against Cost Categories and Limitations; Provisions of the American with Disabilities Act; Property Management; Internal Monitoring; Administration Procedures; Program Performance; Program Accountability; and, Eligibility Verification. Advance notification is provided prior to monitoring reviews. Unannounced visits are made when there is a reason to believe such visits are necessary or could be performed on a sample basis.

K) A Description of the Local Board's Policy and Procedures regarding the Handling of Personally Identifiable and Confidential Information;

Financial Software Program(s) on the Fiscal Officer's computer requires password protection. Only the Executive Director, Assistant Director and Fiscal Officer have access to the password identity. Password(s) is kept in a locked, fireproof safe. The Fiscal Officer is responsible for securing all blank checks that are kept in a locked, fireproof safe. Only the Executive Director, Assistant Director and Fiscal Officer have a key to the locked, fireproof safe. The Executive Director and Fiscal Officer secure all personnel files,

which contain social security numbers, addresses, etc., in a locked, fireproof safe. The payroll register, payroll checks, payroll tax reports and check registers are also kept in a locked, fireproof safe. Staff computers, which contain records, documents, etc., require password protection. Only NPWDB, Inc. Staff can access said records, documents, etc. on NPWDB, Inc. owned computers. Only the Executive Director and Assistant Director shall have access to all password identities. The MACC Coordinator/Property Officer keeps equipment and property lists in a locked, fireproof safe. The insurance register, insurance policies and all leases will also be kept in a locked, fireproof safe.

L) A Description of the Local Board's Procedures for Handling Grievances and Complaints from Participants and other Interested Parties affected by the Local American Job Center System, including Partners and Service Providers. Provide a Separate Description for the:

1. Complaints alleging Discrimination on the Grounds of Race, Color, Religion, Sex, National Origin, Age, Disability, Political Affiliation or Belief and for Beneficiaries only, Citizenship or Participation in any WIOA Title I- Financially Assisted Program or Activity.

Section 188 of the WIOA, and the implementing regulations at 29 CFR Part 37, prohibits exclusion of an individual from participation in, denial of the benefits of, discrimination in, or denial of employment in the administration of or in connection with any programs and activities funded or otherwise financially assisted in whole or in part under Title I of WIOA because of race, color, religion, sex (including pregnancy, childbirth or related medical conditions, gender identity, and transgender status), national origin (including limited English proficiency), age, disability or political affiliation or belief, citizenship status, or participation in any WIOA Title-I financially-assisted program or activity. The WIOA's nondiscrimination regulations prohibit discrimination in all aspects of the administration, management and operation of WIOA programs and activities.

A complainant must file a complaint within one hundred and eighty (180) days of the alleged act(s) of discrimination or retaliation. The filing period may be extended for good cause in some limited circumstances. However, only the Director of the Civil Rights Center may extend the filing time. Complaints can be accepted by an employee in an American Job Center or the EO Officer of the NPWDB, Inc. The employee or NPWDB, Inc. EO Officer will immediately accept the complaint and forward the complaint to the WorkForce West Virginia EO Officer. The complainant may file with WorkForce West Virginia or the U.S. Department of Labor, Director of the Civil Rights Center (Federal). Filing a complaint with WorkForce West Virginia does not affect a complainant's right to file a complaint with the CRC if he or she is not satisfied with the resolution provided by WorkForce West Virginia. State complaints may be submitted to: William Sochko, EO Officer, WorkForce West Virginia, 40 Commerce Drive, Suite 200, Westover, WV 26501, Phone: (304) 558-1600, WV Relay 7-1-1. Federal complaints may be submitted to: Naomi M. Berry-Perez, Director, U.S. Department of Labor Civil Rights Center (CRC), 200 Constitution Avenue, Room N-4123, Washington, DC 20210, Phone: (202) 693-6502, TDD:

Forms Used to File Complaint

- ❑ **State Level** - An individual may file a complaint at the state level by completing and submitting the WorkForce West Virginia Discrimination Complaint Form which may be obtained from the WorkForce West Virginia EO office or the NPWDB, Inc.;
- ❑ **Federal Level** – Complainant may file a complaint with the Civil Rights Centers by completing and submitting the “Civil Rights Center’s Complaint Information and Privacy Act Consent” forms. Forms may be obtained from the WorkForce West Virginia EO Officer or from the CRC. Forms are available electronically on CRC’s website, and in hard copy via postal mail upon request. Hard copy complaints may be sent to the CRC. (Reference 29 CFR Part 38.70); and,
- ❑ **State Level Complaint Processing** –The complaint may be filed with either the recipient, WorkForce West Virginia (state) or the DOL, CRC (federal). WorkForce West Virginia has chosen mediation as the method of ADR. The complainant will be requested to notify the WorkForce West Virginia EO Officer within 5 days of receipt of the written notice if the complainant wishes to participate in mediation. Or the complaint can follow the customary state level complaint process. Any person electing to file at the state level shall allow WorkForce West Virginia 90 days from the date of receipt of complaint to process the complaint. (Reference 29 CFR Part 38.72) (If the Notice of Final Action is issued during the ninety (90) day period and the complainant is dissatisfied with the decision, the complainant has a right to file a complaint with the CRC, within thirty (30) days of the date on which the complainant receives the Notice of Final Action). Respondent will be notified that a complaint alleging discrimination has been filed and is being processed.

2. Complaints and Grievances not alleging Illegal Forms of Discrimination. This includes Grievances from Individuals alleging Labor Standard Violations.

Any WIOA Title I program participant or other interested party adversely affected by a decision or action by the local workforce development system, including decisions by One-Stop partners and services providers, has the right to file a grievance or complaint with the WDB. It must be filed within thirty (30) days of the date the incident occurred. The WDB shall issue a written decision of a hearing within 60 days. The WDB shall notify the complainant and the respondent of the opportunity for an informal resolution. When the complaint has been resolved through the informal resolution process, the WDB shall attempt to contact the complainant and have him or her provide a written withdrawal of the complaint within 10 days. Hearings on any grievance or complaint shall be conducted within 30 days of filing of a grievance or complaint. The complainant and the respondent must be notified in writing of the hearing 10 days prior to the date of the hearing. The WDB will seek impartial hearing officers. Not later than 60 days after the filing of the grievance or complaint, the hearing officer shall mail a written

decision to both parties by first class mail. Either party has the right to request a review of the decision by the State Review Panel within 10 days of the receipt of the decision. If a complainant does not receive a decision at the WDB level within 60 days of the filing of the grievance or complaint, or receives an adverse decision, the complainant then has the right to file an appeal with the State. The complainant may request a State hearing by submitting a written notice of appeal to: State WIOA EO Officer, Workforce West Virginia, 40 Commerce Drive, Suite 200, Westover, WV 26501. For further explanation of this policy, including State and Federal Level Grievances and Grievance forms, please refer to Attachment F-NPWDB, Inc./WIOA Grievance Procedures.

3. Remedies that may be imposed for a Violation of any Requirement under WIOA Title I, limited to, Suspension or Termination of Payments under the Title; Prohibition of Placement of a Participant with an Employer that has violated any Requirement under WIOA Title I; Reinstatement of an Employer, Payment of Lost Wages and Benefits, and Reestablishment of other Relevant Terms, Conditions and Privileges of Employment, where applicable; and other Equitable Relief as Appropriate.

Remedies will be tailored to the specific circumstance and violation and may include, but not limited to: Provisions of services, benefit or employment opportunity denied; Monetary payment for loss of employment opportunity or benefit; Disciplinary action against the individual found to have discriminated; Training for individual found to have discriminated and for other appropriate individuals; Nullification of an adverse action; Removal of adverse records or documents from customer's personnel files; and, Preparation of statement of no retaliation.

M) A Description of the Local Board's Policy and Procedures with regard to Aid, Benefits, Services, Training and Employment, include a Statement of Assurance that you will provide Reasonable Accommodations to qualified Individuals with Disabilities unless providing the Accommodations would cause Undue Hardship;

In servicing individuals with disabilities, the NPWDB, Inc. makes every effort to provide reasonable accommodations to allow for full program participation including, but not limited to, providing auxiliary aides and services and ensuring effective communications through alternation formats.

N) A Description of how the Local Board will ensure Compliance with the Americans with Disabilities Act. The Description should include how the Local Board will provide Reasonable Accommodations regarding Materials, Technology and Physical and Programmatic Accessibility of Facilities. The Description should also include how the Local Board will provide Staff Training and Support for addressing the Needs of Individuals with Disabilities;

As a condition to the award of financial assistance under Workforce Innovation & Opportunity Act (WIOA), the NPWDB, Inc., the grant applicant, assures, with respect to operation of this WIOA funded program or activity, that it will comply fully with the nondiscrimination and equal opportunity provisions of the Workforce Innovation & Opportunity Act, Title VI of the Civil Rights Act of 1964, as amended, Section 504 of the Rehabilitation Act of 1964, as amended: The Age Discrimination Act of 1975, as amended; Title II Subtitle a of the Americans with Disabilities Act of 1990; Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in education programs; and, Section 188 of the WIOA Title I, which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth and related medication conditions, sex stereotyping, transgender status and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States or participate in an WIOA Title I financially assisted programs and activities. The grant applicant also assures that it will comply with 29 CFR Part 38 and all other regulations implementing the laws listed above. The assurance applies to the grant applicants' operation of the WIOA Title I financially assisted programs and activities and to all agreements the grant application makes to carry out the WIOA Title I financially assisted program or activity. The grant applicant understands that the United States has the right to seek judicial enforcement of this assurance.

INDIVIDUALS WITH DISABILITIES NORTHERN PANHANDLE REGION WITH A DISABILITY UNDER AGE 65, 2016-2020	
HANCOCK	10.5%
BROOKE	11.9%
OHIO	10.2%
MARSHALL	12.7%
WETZEL	13.2%
TYLER	13.1%
(WEST VIRGINIA – 13.9%)	

***US Census Bureau, Quick Facts, July 1, 2021.**

In an effort to provide easy access to workforce development system facilities and programs for individuals with disabilities, the NPWDB, Inc., Core and Required Partners assure compliance with WIOA Section 188 and the Americans with Disabilities Act of 1990. In the local workforce development system facilities, we will be responsible for continued compliance with all federal, State and local laws and regulations. West Virginia Division of Rehabilitation Services (WVDRS) staff regularly meets with American Job Center Staff to identify opportunities for improvements at regional American Job Centers including: Cross-training; Technology assistance for American Job Center, Core and Required Partner Staff; Coordinating Programs and Services to better address the diverse needs of disabled job seekers; and, Reducing duplication of efforts. American

Job Center, Core and Required Partner Staff share valuable data among each other in an effort to fully integrate the delivery of Programs and Services to this target group. Job Center Operator Staff and other Core and Required Partner Staff provide individuals with disabilities access to a variety of resources, programs, services and information, including information about available training opportunities. Intensive Supportive Services are provided as a way to help an individual better manage his/her disabilities. WVNCC will also provide rehabilitation technology that will serve as a viable resource for ensuring American Job Center locations are physically and programmatically accessible. The Mountain State Educational Services Cooperative (MSESC) also makes special, unique programs and activities available for individuals with disabilities.

O) A Description of the Local Board's Policy and Procedures in place to ensure that Communications with Individuals with Disabilities, including Individuals with Visual or Hearing Impairment, are as effective as Communications with Others;

The NPWDB, Inc. will work with sign language translators to deliver Programs and Services to this target group. Assistive technology available at American Job Centers includes technology for the visually impaired. Sign language translators will be provided by the West Virginia Division of Rehabilitation Services (WVDRS).

P) A Description of the Steps the Local Board will take to meet the Language Needs of Limited English Speaking Individuals who seek Services or Information .The Description should include how the Local Board proposes that Information will be disseminated to Limited English Speaking Individuals;

For individuals who speak limited English, the NPWDB, Inc. will provide written materials in Spanish and other languages as required and use interpreting services offered by NPWDB, Inc. Staff and Partner agencies.

Q) A Description of the Local Board's Procurement System, including a Statement of Assurance that the Procedures conform to the Standards in USDOL Regulations set forth in 2 CFR 200.

The NPWDB, Inc. gives its assurance that procedures will conform to the Standards in USDOL Regulations set forth in 2 CFR 200. The NPWDB, Inc. will comply with 2 CFR 200.318 which states non-federal entities will reflect applicable state laws and regulations "which conform to applicable federal law." All purchases must also follow West Virginia Code Section 5A-3-1 et seq., and the Code of State Rules Section 148-1-1 et seq. The Purchasing Division Procedure Handbook can be found at:
<http://www.state.wv.us/admin/purchase/Handbook/default.html>.

Purchases of supplies or one (1) time services of \$3000 or less may be made without competitive quotations, but should be distributed equitably among qualified suppliers. All purchases must have prior written approval by the Executive Director. All purchases over \$3000 are made on the basis of formal written quotations from an adequate number of qualified sources. At least three (3) quotations must be attained. All

purchases must have prior written approval by the Executive Committee. Selection of Service Providers will be done via a competitive bid or a Request for Proposal (RFP) format. Selection of a Service Provider will be based on the vendor's ability to demonstrate prior effectiveness of performance, provide fiscal accountability and cost effectiveness and serve the target population. When appropriate and necessary, consultant services or professional services are publicly solicited. Once the solicitation process is completed, a Professional Services Rating System Form is completed by the Property Officer. The Executive Director, or the Executive Committee, will then review, and approve, the Property Officer's recommendation on this Form. Once an award has been approved, a written contract will be initiated between the NPWDB, Inc. and the Vendor or Service Provider. A written contract will clearly define the work to be performed. The written contract will be signed by the Executive Director or Assistant Director and the Vendor or Service Provider. The qualifications of the consultant and reasonableness of fees will be considered in hiring consultants. Consultant services will be paid for as long as work is performed. The Board of Director or the Executive Committee will approve all audit and other significant contracts. Sole source contracts may be necessary for services not available by multiple vendors. Sole source procurement will be justified because one (1) or more of the following conditions have occurred: There was prior approval from the federal awarding agency or pass-through entity; The item or service is available only from one (1) source; A public exigency or emergency exists; or, Competition was determined to be inadequate. Duplication of services or facilities available from federal, State or local funds will not occur unless it can be demonstrated that alternative services or facilities are more effective. The NPWDB, Inc. will provide maximum opportunities to minority and women-owned entities to obtain contract(s). We will: Place qualified small businesses and minority and women-owned businesses on regional solicitation lists; Ensure that small business and minority and women-owned businesses are solicited whenever they are potential sources; Encourage maximum participation of small businesses and minority and women-owned businesses; Establish delivery schedules that encourage participation by all businesses, including small businesses and minority and women-owned businesses; Use services and assistance, as appropriate, from entities such as the Small Business Administration (SBA) and Minority Business Development Agency; and, Require prime contracts to follow the previously identified requirements. Any variance or additions to these procedures must be approved in writing by the Board of Directors. The NPWDB Inc. publicly solicits Provider(s) of Training Programs and Services via a Request for Proposal (RFP) process every one (1) to three (3) program years. Appropriate Sub-Committee(s) of the Board of Directors will be responsible for soliciting, reviewing and rating RFPs received. Appropriate Sub-Committee(s) will also be responsible for recommending what level of funding, if any, should be awarded to a Provider(s). Once completed RFP packets are received back at the NPWDB, Inc., they are evaluated using a Program Evaluation Form/Rater Scoring System. Rating scores are totaled and averaged among those staff and sub-committee members who actually reviewed, then rated them. Appropriate Sub-Committee(s) then voice their recommendation(s) to the Board of Directors. The Board of Directors is responsible for approving all awards/contracts to Provider(s). The NPWDB, Inc. will provide maximum opportunities to community-based organizations.

The NPWDB, Inc. will not: Give non-competitive contracts to consultants that are on retainer contracts; Award contracts that pose an organizational conflict of interest;

Specify only a brand name product instead of allowing an equal product to be offered; Engage in other any arbitrary action in the procurement process; and, Will not provide geographical preference in awarding a contract with federal funds

R) A Description of Documentation to demonstrate that the Acquisition, Management and Disposition of Property adheres to the Property Management Procedures taken from USDOL Regulations 2 CFR 200;

Equipment with a current fair market value of \$5,000 or less may be retained, sold or disposed of with no further obligation. Equipment with a current fair market value in excess of \$5,000 may be retained by the NPWDB, Inc. or sold. If sold, the U.S. Department of Labor is entitled to an amount calculated by multiplying the current market value or proceeds from the sale by the NPWDB, Inc.'s percentage of participation in the cost of the original purchase. If the equipment is sold, the U.S. Department of Labor may permit the NPWDB, Inc. to deduct and retain its share of five hundred dollars (\$500) or ten percent (10%) of the proceeds, whichever is less, for its selling and handling expenses. The NPWDB, Inc. may transfer title to the property sold to the U.S. Department Of Labor or to an eligible third party provided that in such cases the NPWDB, Inc. must be entitled to compensation or its attributable percent of the current fair market value of the property. The MACC Coordinator/Property Officer is notified of all cases of loss, damage or destruction of equipment and will make a report to the Executive Director. The Property Officer is responsible for conducting an investigation of said equipment. Once the investigation is completed, the Property Officer immediately notifies the Executive Director. Any equipment disposed or destroyed must first have the prior approval of the Executive Director. Equipment disposed/destroyed is taken to a dumpster or the city dump. Prior to disposing/destroying any equipment, the Property Officer ensures any and all valuable information stored in said disposed equipment is erased and/or transferred. Equipment with a current fair market value of five thousand dollars (\$5,000) or less may be retained, sold or disposed of with no further obligation. The acquisition, management and disposition of property is detailed in Attachment #2 – Financial Procedures, of the NPWDB, Inc.'s Cost Allocation Plan and is in accordance with U.S. Department Of Labor Regulations 2 CFR 200. If the total cost of leasing equipment over a three-year period or less exceeds the purchase price, the equipment should generally be purchased.

S) A Description of any Policies or Procedures the Local Board adopted to avoid Conflicts of Interest or the Appearance of such Conflicts in the Exercise of their Responsibilities, particularly those related to the Awarding of Contracts;

The NPWDB, Inc. strictly adheres to a Code of Ethic Policy to avoid any potential conflict of interest, or the appearance of, in the exercise of their responsibilities to award contracts. Local Elected Officials (LEOs), Board Members and Staff sign a Conflict of Interest Statement and a Code of Ethics Statement at the start of their term or first day of employment respectively. The NPWDB, Inc. By-Laws set the standards for governing the local workforce development system and the performance of Board Members and Staff, especially since they engage in the procurement of good and services using federal funds.

LEOs, Board Members or Staff cannot solicit gratuities, favors or anything of monetary value from suppliers, or potential suppliers and do not participate in the selection, award or administration of any type of procurement, where to the individual's knowledge, any of the following individuals have a financial or other substantive interest in an organization which may be considered for an award: An officer, employee, agent, member of his/her immediate family, a partner, a person or organization which employs any of the above or with whom any of the above has an arrangement concerning prospective employment; and, Any LEO or Board of Directors member or his/her immediate family or place of business. Any violation of law or established standard or conduct by LEOs, Board Members or Staff or members of their families or others may be subject to penalties, sanctions, or other forms of disciplinary actions to the extent permissible by federal, State and local law. All parties involved in the procurement process are fair to all offers. Fairness impartiality is extremely important when reviewing proposals/bids. A proposal/bid must be reviewed on what it says, taking into account past performance and capabilities of the proposer to fulfill the requirements of the proposal/bid when applicable.

LEOs, Board Members and Staff are bound by a Code of Ethics Policy. The Code of Ethics Policy consists of: Conducting oneself, on a personal and professional level, with honesty, integrity, respect, fairness and good faith in a manner which will reflect well upon the Board of Directors; Providing training and employment services consistent with available resources and assure the existence of a resource allocation process that considers ethical ramifications; Assuring the existence of a process to evaluate the quality of services rendered; Avoiding exploitation of relationships for personal advantage; Avoiding practicing or facilitating discrimination; Assuring the existence of procedures that will safeguard the confidentiality and privacy of Providers, participants and others who are served. In particular but not exclusively, Board Members will follow confidentiality requirements for wage and education records as required by the Family Educational Rights & Privacy Act of 1974, as amended, WIOA, and applicable Departmental regulations; Assuring he/she is not in a position to benefit directly or indirectly by using authority or inside information, or allows a friend, relative or associate to benefit from such authority or information; Assuring he/she will not use authority or information to make a decision to intentionally affect the organization in an adverse manner; Conducting all personal and professional relationships in such a way that all those affected are assured that decisions are made in the best interest of the organization and the individuals served by it; Disclosing to the appropriate authority any direct or indirect financial or personal interests that might pose potential conflicts of interest; Accepting no gifts or benefits offered with the expectation of influencing a board decision; Informing the appropriate authority and other involved parties of potential conflicts of interests related to appointments or elections to boards or committees inside or outside the organization; Working to identify and meet the training and employment needs of the community; Refusing to represent special interests or to use this board for personal gain and/or for the gain of friends of supporters; Abiding by the procedures, rules, and regulations of the Workforce Innovation & Opportunity Act (WIOA), policies adopted by the NPWDB, Inc. and all applicable laws of the United States and the State of West Virginia; and, Accepting no employment offers by any contracting agency, any organization or individual contracting with the agency during the Board's procurement process. Nor authorize the employment of a present or former employee of the contracting agency by contractors during the Board's procurement

process. If any violations of the Code of Ethics Policy are made, the Executive Committee reviews and investigates the infraction. The Executive Committee is responsible for detailing any findings and make recommendations to the Board of Directors for corrective and/or disciplinary action, if warranted. LEOs, Board Members and Staff are bound by a Conflict of Interest Policy. Each LEO, Board Member and Staff pledges its support of the NPWDB, Inc. Conflict of Interest Policy via signature at the start of their term or first day of employment. LEOs, Board Members and Staff certify that they have no other interest or relationship which might be expected to be affected by any action taking by the NPWDB, Inc., or which, in the public interest, should be disclosed except for the following: The WIOA law does not prohibit a State or local officer or employee from voting on matters as he/she chooses or from expressing his/her individual opinion on political subjects and candidates; and, The WIOA law also does not prohibit an employee from voluntarily engaging in partisan political management or campaigning. Candidacy for political party office is not prohibited. However, an employee may be a candidate in non-partisan elections. Volunteer work for a partisan candidate, campaign committee, political party or nominating convention of a politic party is permitted.

T) A Description of the Local Board or (Fiscal Agent's) Accounting Procedures, including the Procedures used in preparing Reports to the State. In addition to the Requirements that all Financial Transactions be conducted in Compliance with Generally Accepted Accounting Principles (GAAP), the Fiscal Management System must include the following in the Accounting Procedures. This Description must address how the Fiscal System:

1. Tracks Funding Types, Funding Amounts, Obligations, Expenditures and Assets.

The Subcontracting Accountant, with assistance from the Fiscal Officer, prepares a general journal entry to record each type of funding award received. The Fiscal Officer lists each type of funding award on the Grant and Contract Register Form. The Subcontracting Accountant and the Fiscal Officer carefully review requirements, etc. of each funding award to ensure that all financial provisions are in compliance. Then, the Assistant Director and the Executive Director carefully review each funding award to ensure that all programmatic provisions are in compliance. Original copies of all grants and contracts are maintained at the NPWDB, Inc. Office. The Subcontracting Accountant and the Fiscal Officer track all funds using the accrual method of Generally Acceptable Accounting Principles (GAAP). The NPWDB, Inc.'s Independent Auditor also uses this method of accounting when auditing the NPWDB, Inc. Sub-Grantees and Contractors also track awarded funds using the accrual method of GAAP. The NPWDB, Inc. maintains Workforce Innovation & Opportunity Act (WIOA) funds in non-interest bearing account(s). Financial budgets are prepared by the Fiscal Officer based on amounts of funding awards provided by the WorkForce West Virginia Office. The Fiscal Officer ensures financial budgets are on file for all grants and contracts. Any changes to financial budgets are submitted by the Fiscal Officer to the Executive Director for review and approval as soon as they are realized. The Subcontracting

Accountant and the Fiscal Officer ensure: Expenditures do not exceed total funding awards and/or budget amounts; Expenditures are being charged off to the correct and appropriate budget award(s); and, The administration cost limitation within each budget award does not exceed ten percent (10%). The Fiscal Officer and the Assistant Director ensure Sub-Grantee or Contractor expenditures do not exceed the total funding award and expenditures are being charged off to the appropriate line items correctly and appropriately. The Assistant Director and/or the Program Coordinator monitor Sub-Grantees and Contractors fiscal activities no less than two (2) times each program year. To ensure expenditures stay within the funding awards and the budget amount(s) and cost limitations, internal fiscal forms and reports have been developed and are used by the Fiscal Officer and the Subcontracting Accountant to track expenditures for the NPWDB, Inc. and its Sub-Grantees and Contractors. Internal forms and reports are reviewed by the Executive Director at least once a month. The Fiscal Officer and the Executive Director are responsible for developing contracts and budgets for each funding award received. Any modification to a funding award is updated by the Fiscal Officer. Each funding award is charged for direct costs relating to a specific program, activity or service. Expense accounts in the general ledger correspond to the award budgets. The Executive Director reviews fiscal recordings and trial balance(s) at the end of each month for accuracy. In accordance with Section 133 (b) (4) (A) (B) of the WIOA, the NPWDB, Inc. may transfer up to one hundred percent (100%) of funds between Adult and Dislocated Worker funding sources. If so, the NPWDB, Inc. will submit the necessary documentation and effective date of transfer to the WorkForce West Virginia Office. The reason for the requested transfer of funds will be documented. The Fiscal Officer maintains inter-fund transfers between operating accounts and other accounts in checkbook registers. The Executive Director must provide written prior approval for all funds being transferred.

2. Permits the Tracking of Program Income, Stand-In Costs, and Leveraged Funds.

The NPWDB, Inc. may, if necessary, carry out fundraising projects and solicit non-Workforce Innovation & Opportunity Act (WIOA) program funds. The NPWDB, Inc. may use non-WIOA program funds to match and/or leverage other outside resources, grants or funding. The NPWDB, Inc. must use non-WIOA program funds to pay a disallowed cost. If needed, a stand-in cost may be substituted for a disallowed cost. A stand-in cost does not include in-kind contributions. Program-related income will be generated back into WIOA program activities as a way to reduce the total cost of the program(s) generating the income. Donations of cash and non-program related income will be accounted for and tracked separately.

3. Is adequate to prepare Financial Reports required by the State.

The Fiscal Officer develops and maintains a listing of all required fiscal and expenditure reports with their due dates. It is the responsibility of the Subcontracting Accountant and Fiscal Officer to ensure that fiscal and expenditure reports are submitted to the appropriate individual or group of individuals at the WorkForce West Virginia Office in a timely manner. The Subcontracting

Accountant and Fiscal Officer prepare monthly, quarterly and annual expenditure reports for all funding awards. After the Executive Director reviews, approves and signs off on fiscal and expenditure reports, they are submitted to the WorkForce West Virginia Office via the Mid-Atlantic Career Consortium (MACC).

U) An Identification of Key Staff who will be working with WIOA Funds;

The Board of Directors formulates financial policies, reviews and oversees financial operations and activities on an ongoing and regular basis and delegate administration of financial policies to Administrative Staff. The Administrative Staff is responsible for all operations and activities, including financial. The Assistant Director, Fiscal Officer and Subcontractor Accountant are responsible to the Executive Director and the Board of Directors for financial operations and activities. Lines of authority are detailed in the NPWDB, Inc.'s fiscal organizational chart and are followed by all Staff. Job descriptions are maintained for Staff who have fiscal responsibilities and perform fiscal duties. Financial duties and responsibilities are separated among appropriate Staff so that no one has sole control over cash receipts, disbursements and payroll. The Subcontracting Accountant is responsible for reconciling and preparing: bank reconciliation statements, financial spreadsheets, trial/cash balances, cash disbursement journals, the general ledger and the chart of accounts. The Subcontracting Accountant and the Fiscal Officer are responsible for documenting and maintaining records of all contracts and grant awards.

V) A Description of how the Local Board's (or Fiscal Agent's) Financial System will permit Tracking of Funds to a Level adequate to establish that Funds have not been used in Violation of WIOA Standard or USDOL Regulations;

Funds are drawn down by the Fiscal Officer on an as-needed basis in accordance with federal and State regulations. The amount of funds drawn down is determined by anticipating future expenditures for the allowed period. Requests for drawdown of funds are supported with proper back-up documentation justifying the amount of funds being requested. Drawdown of funds must have prior written approval from the Executive Director. Funds drawn down are provided to the NPWDB, Inc. via electronic transfer from the State WorkForce West Virginia Office. The NPWDB, Inc. receives email notifications that funds drawn down have reached its bank account. All Fiscal Staff are bonded for protection against potential loss and wrongful acts and covered by a fidelity bond.

Deposit slips are completed in duplicate by the Fiscal Officer. Deposit slips include: The source; Account number; and, Amount of each receipt. Documentation for all receipts, including a copy of the deposit slip, copy of check, letter, etc. will be attached and filed accordingly. Deposits are made by the Executive Director or the Assistant Director on an as-needed basis. The Fiscal Officer maintains duplicate copies of all deposit slips. The Fiscal Officer records cash receipts in the cash receipts journal. Any checks made out to the NPWDB, Inc. are endorsed as follows: "For Deposit Only" Northern Panhandle Workforce Development Board, Inc. (NPWDB, Inc.).

About twenty-five (25) years ago, Local Elected Officials (LEOs) and the Board of Directors hired a Subcontracting Accountant on a part-time basis to provide oversight of

the NPWDB, Inc.'s financial system and to ensure a solid check and balances system is in place that further supports fiscal accountability. Some of the responsibilities of the Subcontracting Accountant are: To develop and maintain an accounting system using a double entry accounting system, general ledger, cash receipts and cash disbursement journal; To prepare federal-FICA payments, submit federal and State quarterly and yearly forms and payments; To prepare monthly, quarterly and annual fiscal reports and financial statements; To prepare balance sheets; To prepare fiscal reports and records; To reconcile bank statements on a monthly basis; and, To complete and file all federal, State and local income tax payments throughout the program year.

Invoices, vouchers, timesheets, etc. are date stamped upon receipt, prepared and charged off to the appropriate funding award. Invoices, vouchers, timesheets, etc. must be originals and must be signed off and approved by the Executive Director of the NPWDB, Inc. prior to payment being made. NPWDB, Inc. Staff records all invoices, vouchers, timesheets, etc. in the appropriate check register. A general ledger is kept showing all checks written against the WIOA account, receipt of funds and a trial balance. On a monthly basis, the NPWDB, Inc. prepares a report detailing: Expenditures among WIOA funding awards; Receipt of funds; Activity in interest account, etc. for the Executive Committee to review and approve. On behalf of the Executive Committee, the Treasurer of the Board of Directors is responsible for signing off on the report. The Fiscal Officer maintains all financial documents, checks, etc. in a locked, fireproof safe at all times during and after the regular workday. The Fiscal Officer executes and oversees Staff payroll. Staff payroll is prepared and disbursed to staff by the Fiscal Officer after Itinerary Reports and Timesheets have been submitted, reviewed and approved by the Executive Director. Reconciliation of checking account(s) and ledgers is done on a monthly basis. The Fiscal Officer and Subcontracting Accountant prepare required federal and State reports. The financial system is capable of generating necessary and required information and reports required under the WIOA. This information assists Staff with its monitoring and management efforts of WIOA funded Training Programs and Services. All financial records, checks, ledgers, etc. are maintained and stored by the Fiscal Officer in a locked, fireproof safe on a daily basis.

The NPWDB, Inc.'s travel policies are applicable to all Local Elected Officials (LEOs), Board Members and Staff. All work-related travel in and out of the region of service is approved in advance by the Executive Director or the Executive Committee, as appropriate. 4 Staff completes the Request for Authorization Form prior to travel and submit it to the Executive Director for approval. The Executive Director or the Executive Committee will approve all out-of-area travel. Disapproved requests will be returned to the Staff and marked "disapproved." Once work-related travel has been completed, LEOs, Board Members and Staff will complete a Travel Expense Voucher Form. Hard copy receipts must be attached to the Travel Expense Voucher Form supporting any lodging and/or common carrier transportation. Hard copy receipts for tolls and parking are required as well. No hard copy receipts equals no reimbursement. Incomplete Travel Voucher Expense Form (Mileage Form) will be returned to the staff member for completion. The reimbursable mileage rate will not exceed the current Internal Revenue Service (IRS) approved mileage rate. There will be no loans made to any employee of the NPWDB, Inc., Sub-Grantee or Contractor under any circumstance. The same holds true for LEOs and Board Members. Debts are unallowable.

The Executive Director reviews all leases prior to submission to the Executive Committee for final approval. All significant leases are approved by the Board Chairperson, Executive Director and/or the Executive Committee. Other less significant leases can be approved and signed by the Executive Director. Leases correspond to program years whenever possible. Copies of all signed leases are immediately forwarded to the Property Officer who files them in a locked, fireproof safe. The Property Officer lists each lease on the Lease Register Form which is maintained in a locked, fireproof safe.

The NPWDB, Inc. is the custodian of all financial and program records, files, participant folders and documents. All records, files, participant folders and documents are safely stored and kept in locked, fireproof filing cabinets at NPWDB, Inc. facilities. Current and past records, files, participant folders and documents are periodically checked to ensure safekeeping and to ensure they have not been altered, damaged, deleted or destroyed. No original records, files, participant folders or documents are removed from a NPWDB, Inc. facility. They will be retained by the NPWDB, Inc. for a period of no less than six (6) program years. However, if there is any type of litigation involving a particular issue or matter, those records, files, participant folders or documents are retained for an extended period until litigation is resolved and finalized. Records, files, participant folders or documents may be transferred among NPWDB, Inc. facilities by NPWDB, Inc. or Sub-Grantee and Contractor Staff only. When use of/work in records, files, participant folders or documents are completed, NPWDB, Inc., Sub-Grantee or Contractor Staff must return these documents to the headquarter facility site. All protected personally identifiable information and other sensitive data are safeguarded.

Should a disaster be projected and time is limited, only information and data considered to be the most critical will be saved so as to avoid a potential disruption in Programs and Services. If a disaster unexpectedly occurs, NPWDB, Inc. Staff immediately recovers all critical information, data, property and equipment so business can be restarted immediately. Good communication lines among Staff, the Board of Directors, Core and Required Partners, Sub-Grantees, Contractors and the WorkForce West Virginia Office will be frequent and open during any disasters.

The Fiscal Officer prepares and maintains an Insurance Register which is stored in a locked, fireproof safe. Insurance policies are maintained in an insurance file by the Fiscal Officer and will be stored in a locked, fireproof safe as well. Insurance policies correspond to the program year whenever possible. Insurance policies are carefully reviewed by the Fiscal Officer and the Executive Director before renewal. Reasonably adequate coverage is maintained for property and liability insurance. Records, programmatic and financial, are retained for at least a three year (3) period from the date of submission of annual final expenditure reports. Should there be any outstanding litigation, claims or audit findings at the end of this three (3) year period, the records will be retained for an additional three (3) years or until all litigation has been resolved. The same holds true for any designated Sub-Grantee, Contractor or Training Provider of WIOA Programs and Services in the region. All Staff, including Sub-Grantee and Contractor Staff, backs up all electronic information and data with thumb or flash drives. Backup of electronic information and data is completed by NPWDB, Inc., Sub-Grantee and Contractor Staff no less than once weekly and then be stored in a locked fireproof safe.

A clear audit trail is in place. A Subcontracting Independent Auditor performs an annual audit of all NPWDB, Inc. WIOA expenditures. Results of this independent audit are reviewed and discussed with the Board of Directors. A copy of it is then provided to the WorkForce West Virginia Office for review. A copy of the independent audit is filed with the Federal Audit Clearinghouse with Form SF-SAC. If there are any findings noted in the audit, the NPWDB, Inc. works closely with the Subcontracting Independent Auditor to resolve findings under the guidance and direction of the WorkForce West Virginia Office. The Subcontracting Independent Auditor prepares the following on behalf of the NPWDB, Inc.: The Form 990; Return of Organization Exempt from Income Tax; and, Filing of all Income Tax Extensions. The Executive Director or an Officer of the Board of Directors signs Form 990. Incidents of fraud, especially financial ones, are well-documented and immediately reported to the appropriate governing entities, like: the Board of Directors; WorkForce West Virginia Office, the U.S. Department of Labor, the Office of the Inspector General (OIG).

W) Provide a Brief Description of the following:

1. Fiscal Reporting System.

The Executive Director, Assistant Director, Subcontracting Accountant and Fiscal Officer maintain administrative and program costs reports generated from the Mid- Atlantic Career Consortium (MACC) system indicating the amount of funds spent on each program, activity and/or service in each title of funding. These reports are submitted to the WorkForce West Virginia Office through the MACC system on a monthly basis. Administrative and program cost reports are signed off on and approved by the Executive Director prior to submission. Reimbursements/adjustments may be made to a title of funding based upon these reports at the end of the quarter.

2. Obligation Control System.

Once actual award amounts are known, the NPWDB, Inc. prepares internal budgets for each of its funding streams: Adult, Dislocated Worker and Youth. Associated delivery of program and services, with estimated amount allocated for the program year, are detailed within each budget. Internal budgeting allows us to control the total obligation level of each funding stream. NPWDB, Inc. Staff monitors obligations and expenditure levels of each budget, program or service no less than two (2) times a program year to ensure costs are in line with total available funding. The same process is used when the NPWDB, Inc. is awarded other funding stream(s), besides Adult, Dislocated Worker and Youth Funding.

3. ITA Payment System.

The expenditure limit for an Individual Training Account (ITA) under Workforce Innovation & Opportunity Act (WIOA) funding is five thousand five hundred dollars (\$5,500) per program year per ITA participant, not to exceed eleven thousand dollars (\$11,000) for a maximum period of two (2) years. The Training Provider first completes a Cost Data Sheet for each ITA participant wanting to enroll in an approved training program or course on the Eligible State Provider

List (ETPL). The Training Provider sends this Sheet to the NPWDB, Inc. for prior approval of all costs associated with the ITA Participant training. Once the NPWDB, Inc. approves costs associated with the ITA Participant's training, the Training Provider completes an ITA Invoice Sheet to request payment. The total amount invoiced for each ITA participant cannot exceed the amount detailed on the ITA participant's Cost Data Sheet. Backup documentation is available for review if requested. The Training Provider invoices the NPWDB, Inc. for tuition costs a total of three (3) times per ITA participant based on the payment schedule below: Forty percent (40%) of tuition cost at enrollment in the training program or course. Enrollment is defined as: ITA participant has been accepted into a training program or course and has attended at least five (5) days of Training Program; Thirty percent (30%) of tuition cost at mid-point of training program or course. Mid-point of training program or course is defined as: ITA participant has completed no less than one-half ($\frac{1}{2}$) of the training program curriculum; and, Thirty percent (30%) tuition costs upon completion of training program or course. Completion of training program or Course is defined as: ITA participant has completed one hundred percent (100%) of the required training program or course curriculum. For long-term training programs, one (1) to two (2) years that has semester/quarter based tuition costs, the above schedule will be adhered to on a semester/quarter basis. The above payment schedule will be followed by all Training Providers unless an otherwise mutually agreed upon payment schedule for Higher Education and/or State operated institution of learning has been negotiated.⁶ If an invoice from a Training Provider for an ITA participant includes several items, like, tuition, books and supplies, a breakdown of said charges must be included with the invoice. Payments for any fees will not be made prior to it actually occurring. Payments for fees such as parking, graduation, etc. must have backup documentation attached to the invoice detailing said costs. Invoices for WIOA funded ITA Training Programs are due to the NPWDB, Inc. Office on the 10th and 25th of each month by 4:00 pm. If the 10th or the 25th falls on a weekend or holiday, invoices will be accepted through 4:00 pm on the next workday. If an invoice is received after 4:00 pm on the due date, it will be processed on the next invoice cycle. Requests for payments will be processed and paid no later than five (5) working days after due date. Payments will be mailed to payee. ITA participants will only be paid attendance per diem, if approved, for actual classroom attendance as initialed and signed by instructors. Child care, if approved, will be paid for time the ITA participant is in scheduled training only. Child care payments are not made to parents and/or any other individual who lives in the same household. Under no circumstances can a parent of a child receive childcare payments. The costs of any repeated course(s), lost books, etc. shall not be borne by the NPWDB, Inc.'s WIOA funds. In order for payments to be made, the ITA participant must be making satisfactory progress, as defined by 2.0 Grade Point Average (GPA) or better.

4. Chart of Account System.

A Chart of Accounts is kept to identify all expenditures by cost categories. The Chart of Accounts is maintained by the Fiscal Officer and the Subcontracting Accountant to track financial accounts. The Chart of Accounts includes, but is not limited to: Account #, Type, Account Description and Tax Line #. The NPWDB,

Inc. uses a double entry system for accounting of its funds. The Fiscal Officer records all receipts and checks in the cash receipts and disbursements journal/check register on a daily basis. The Subcontracting Accountant prepares general journal entries. The Executive Director approves all general journal entries. Adequate documentation is maintained to support all general journal entries. At the end of the month, the Subcontracting Accountant: Totals cash receipts in the disbursements journal; Posts totals in the general ledger; Posts the general ledger; and, Prepares a trial balance.

5. Accounts Payable System.

Checks issued are pre-numbered. The Fiscal Officer prepares checks based on supporting, hard copy documentation. Payments made electronically to vendors are supported by back-up documentation as well. One (1) signature, the Executive Director's, or Chairperson's, or Treasurer's, is required on all checks. The Fiscal Officer stamps all invoices "Paid". Checks are distributed as follows: Original – Mailed to the payee by the Fiscal Officer. Duplicate or Copy of Check – Filed at the NPWDB, Inc. Office, with all supporting documentation attached to it, alphabetically by vendor. In no event will checks: Be prepared unless these procedures are followed; Be prepared from monthly statements or copies of invoices; Be used other than in chronological order; Be prepared and signed in advance; Be made out to "cash", "bearer", "petty cash", etc.; or Be prepared on verbal authorization. Original Checks when canceled are filed monthly at the NPWDB, Inc. Office with back statement and bank reconciliation for cross reference. A voided check has "void" boldly written in ink across the face of the check and the signature portion of the original check will be perforated or cut out. The original voided check is filed with bank statements and canceled checks in chronological order. The reason the check was voided is recorded on canceled check. Bank statements are received by the Executive Director and given to the Subcontracting Accountant unopened who will prepare the bank reconciliation and then provide it to the Executive Director for review, approval and signature. The Subcontracting Accountant provides signature on the bank reconciliations. Checks paid are examined for date, name, cancellation and endorsements periodically. The reconciled bank balance is compared to the Cash in Bank account in the general ledger on a monthly basis and approved by the Subcontracting Accountant. Vendors are notified of all checks outstanding over sixty (60) days. Monthly expenditures are recorded in the cash disbursement journal on a monthly basis. The Fiscal Officer records checks in the check register as well as in QuickBooks. The cash disbursement journal is posted to the general ledger detailing each check written and summarizing the disbursement by the Chart of Accounts. All subsequent adjustments, to properly split account allocations, are recorded as adjusting journal entries and are posted at the end of each month.

6. Staff Payroll System.

QuickBooks software is maintained on the Fiscal Officer's computer and is password protected. Only the Fiscal Officer, the Executive Director and Assistant Director have access to the password identity. The password is kept in a locked, fireproof safe. The Executive Director approves the hiring of all Staff, except

enrollees. A Staff's hiring is not effective until a Change of Status Form, a Form W-4 and all Insurance Forms have been completed. The Change of Status Form is used to detail the new Staff starting salary and when any salary adjustments are made thereafter.

Each Staff is responsible for completing and signing off on a Timesheet and Itinerary Form on a daily basis that details the type of work performed under each funding award.⁷ Itinerary Forms are submitted to the Fiscal Officer who allocates Staff hours worked among funding awards each pay period. The Fiscal Officer then provides Itinerary Forms to the Executive Director for review, approval, signature and filing. Timesheets are submitted to the Fiscal Officer who allocates Staff hours worked among funding awards at the end of each month. The Fiscal Officer then provides Timesheets to the Executive Director for review, approval, signature and filing.

The Fiscal Officer prepare a payroll register. Payroll checks, the check register and the EFTPS worksheet for 941 payroll taxes are provided to the Executive Director for review. The Fiscal Officer then: Phones in the 941 payroll taxes; Records the Acknowledgement Number, and, Records payroll figures in the check register. The Executive Director signs off on all staff payroll checks. In order to maintain a separation of duties, the Subcontracting Accountant signs off on the Executive Director's payroll checks using a signature stamp of the Chairman or Treasurer of the Board of Directors.

The Executive Director or Fiscal Officer distributes payroll checks to Staff. Staff is required to sign off that he/she is accepting his/her payroll check. The Fiscal Officer records Staff payroll in the checkbook and in the Staff's Earnings Record Report. The Subcontracting Accountant maintains all payroll tax reports. The Executive Director signs off on the reports. The Subcontracting Accountant prepares all quarterly payroll tax reports. The Executive Director approves and signs off on all quarterly payroll tax reports. The Fiscal Officer prepares all payments for taxes and records payments in the check register. The Fiscal Officer makes the payment(s) electronically. State Income Tax Reports are completed by the Fiscal Officer.

7. Participant Payroll System.

Youth Services Systems, Inc. (YSS, Inc.), the region's Youth Provider, is responsible for executing and overseeing the payroll system for the "Summer Youth Work Experience" Program; the "Fall Works Experience" Program; the "Spring Works Experience" Program; and the "Winter Works Experience" Program (and any Program Monitors and/or Site Supervisors hired to oversee working Youth). Youth work Monday thru Thursday, eight (8) hours per day. Hours worked per week do not exceed thirty-two (32). There are no paid holidays. There are no paid sick days. There are no paid lunch periods. Youth Participants, Program Monitors and Site Supervisors are paid for time worked only. Youth Participants, Program Monitors and Site Supervisors complete Timesheets at the end of each work day. Each Youth Participant, Program Monitor and Site Supervisor must sign the Timesheet with his/her full name at the end of the pay

period in an effort to verify time reported. Hours of work are not reported until the work is actually performed. Timesheets must be signed by the appropriate parties at the end of each pay period. Completed and signed Timesheets must be received by YSS, Inc. no later than two (2) days after the pay period has ended. Only original timesheets are accepted and processed. Timesheets with original signatures are maintained on file at the YSS, Inc. Office. Payroll is bi-weekly. Checks are delivered to participating worksites by YSS, Inc. Staff no later than five (5) working days after the end of the payroll period. At that time, payroll checks are distributed to Youth Participants, Program Monitors and Site Supervisors. Youth Participants, Program Monitors and Site Supervisors must provide proper identification in order to receive their paycheck. They must also sign a Check Register upon receipt of their paychecks. Signatures certify the delivery and receipt of paychecks were made to the correct individuals and amounts of paycheck are correct. The Check Register is a tool to avoid check distribution problems. The Check Register is maintained at the YSS, Inc. office. Should an individual not be available to receive his/her paycheck, the paycheck is given back to YSS, Inc. Staff who is then responsible for ensuring that the individual receives and signs for his/her paycheck. NPWDB, Inc. Monitors are responsible for monitoring all aspects of the Summer Youth Work Experience Program, including fiscal operations.

8. Participant Stipend Payment System.

The NPWDB, Inc. Assistant Director is responsible for providing Individual Training Account (ITA) participants with NPWDB, Inc. approved Reimbursement Forms which the participant is expected to use/complete when claiming Needs-Related Payments (NRPs). Forms are to be properly completed/signed by the participant and returned to the NPWDB, Inc. by no later than 4:00 pm on the 10th and 25th of each month. Should the 10th or the 25th fall on a weekend or holiday, Forms will be due to the NPWDB, Inc. by 4:00 pm on the next scheduled business day. The NPWDB, Inc. Assistant Director reviews Forms. Once the NPWDB, Inc. Assistant Director determines the completion of these Forms is complete, accurate and signed by the participant, The Assistant Director provides signature. The NPWDB, Inc. Assistant Director provides Forms to the Fiscal Officer and Executive Director for further review and signature as well. A check is then processed by the NPWDB, Inc. Fiscal Officer in the participant's name for the approved amount of NRP's. The NPWDB, Inc. Fiscal Officer provide the participant's check to the NPWDB, Inc. Assistant Director who is responsible for mailing the check to the participant by no later than the fifth (5th) business date after the due date. The participant is also provided with the option of personally picking up his/her check at the NPWDB, Inc. Office. The NPWDB, Inc. Assistant Director is responsible for tracking all participants who receive NRPs, the amounts of payments and the date NRPs were made through an internal participant tracking system. In the event of overpayment or fraudulent activity on the part of the participant, all NRPs made to the participant will immediately be ceased and attempts for recovery will be initiated. All cases of fraud will be immediately forwarded to the appropriate legal authorities for prosecution.

X) A Description of the Local Boards (or Fiscal Agent's) Cash Management System, providing Assurance that no Excess Cash will be kept on hand and that Procedures are in place to monitor Cash;

The NPWDB, Inc. provides assurance that no excess cash will be kept on hand. Procedures are in place to ensure an appropriate level of Workforce Innovation & Opportunity Act (WIOA) funds exists at all times to cover organizational and program expenses. Financial account amounts will be kept as a minimum and limited to only actual, immediate costs needs. Cost reimbursement requests are submitted to the WorkForce West Virginia Office about twice a month on an as-needed basis. WIOA funds are received electronically from the WorkForce West Virginia Office approximately ten (10) days after requests are made. Receipt of WIOA funds is immediately recorded in the NPWDB, Inc.'s accounting system, including QuickBooks. When preparing cash reimbursement requests for WIOA funds, the NPWDB, Inc. estimates cost projections for an expected time period. Cost projections include actual payments being requested from Sub-Grantee(s), Contractors and Training Providers. They also include recurring costs, like: Staff payroll, rent, utilities, etc. The NPWDB, Inc. pays vendors, Sub-Grantees, Contractors and Training Providers at least twice a month.⁹ Staff payroll is paid on a bi-weekly basis. The amount of WIOA funds on hand is reviewed by the Subcontracting Accountant and the Executive Director no less than twice a month.

Y) Description of the Local Board's Cost Allocation Procedures including;

1. Identification of Different Cost Pools.

Costs that are considered "Direct Costs" are ones that can be satisfactorily assigned to a particular activity, service, etc. within a specific funding award, with appropriate, supporting backup documentation. Direct Costs are those that are directly charged to a cost category. Examples of Direct Costs are: Employee Wages; Fringes; and, Benefits. Indirect Costs are those costs incurred for a common or joint purpose benefitting more than one cost objective and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Subsequently, Indirect Costs do not have a direct relationship to a particular funding award and will be treated as such. After Direct Costs have been determined and assigned directly to awards or other work as appropriate, Indirect Costs are those remaining to be allocated to benefitting cost objectives. Examples of indirect costs are: Membership fees; Conference and workshop travel; Supplies and equipment for Staff; and, Facility expenses. These costs will be "pooled" on a monthly basis. Indirect Costs will be consistent and measurable and be supported by appropriate backup documentation. The Indirect Cost Rate used is ten percent (10%) De Minimis Rate. There are two (2) categories of Indirect Costs incurred by the NPWDB, Inc.: 1) Operational Costs (These are costs incurred directly by the NPWDB, Inc.); and, 2) Job Center Core and Required Partner Costs. These are costs incurred to operate regional American Job Centers.

2. Procedures for Distribution of Staff Costs between Cost Categories (ie: Administrative, Program and Indirect Cost).

Benefits received by each program dictate how costs are distributed and reported by Program Title, Subtitle or Cost Category. Staff is required to keep daily record of time and attendance that indicates the allocation of costs between funding streams based on effort and benefit by program activities. The cumulative percentage of time allocable to each funding activity is established each month and allocated back to the appropriate cost category and funding source(s). Staff maintains and submits a monthly Travel Voucher Expense Form (Mileage Form) to the Fiscal Officer. Mileage reimbursement includes a distribution of miles traveled in support of individual funding stream(s). Membership fees, conference or workshop travel or other related Staff costs are directly charged to the appropriate function and/or project once determination of the funding stream and cost category benefited has been identified.

3. Procedures used for Distribution of Funds from each Cost Pool.

Direct Costs are directly assignable to a particular funding award(s) based on daily or monthly itinerary reports completed/kept by all Staff. Work hours detailed in the daily or monthly itinerary reports for each Staff are totaled. The total number of hours is multiplied by funding stream by each Staff Member's hourly rate. This amount is then directly allocated to a particular funding award(s) and/or the Administrative Line Item. These costs are allocated on a monthly basis and are the basis for the allocation of all related indirect costs. Any activity or cost that can be specifically assigned to a particular cost center is a direct cost. Examples are: Staff travel; Sub-Grantee and Contractor costs; Marketing; Printing; Supplies; and, Materials. These costs are allocated based on benefit received and charged to each program component (Adult, Dislocated Worker, Youth) in the same manner as Staff salaries. Indirect Costs include: Rent; Telephone; Office and printing expenses; Insurance; Utilities; Dues and subscriptions; Postage; Computer maintenance; Salary and fringes for Job Center Operator Staff and other associated Job Center Operator; and, Miscellaneous expenses.

4. Description of Funds included in each Cost Pool.

Funds included in each Cost Pool include: Workforce Innovation & Opportunity Act (WIOA) Adult; Dislocated Worker; and, Youth funds. Also included are other types of funds that are awarded to the NPWDB, Inc. on a limited basis and/or temporary basis, like: Supplemental Nutrition Assistance Program (SNAP) Program funding and Opioid Grant funding.

5. Description of the Cost Allocation Plan for American Job Centers.

The cost allocation method used in the Cost Allocation Plan for American Job Centers is "equitable," "consistent" and "fixed." Costs are considered "reasonable" and within Core and Required Partners individual program guidelines.¹⁰ Care is taken to ensure that the allocation base does not distort

the results. Costs are distributed in a fair and equitable manner without distorting the results. To be allowable, costs are deemed necessary for the proper and efficient operations of American Job Centers. This step reduces the risk of accumulating costs and, subsequently, being held accountable for any potential disallowed costs. Costs are in compliance and in conformance with Generally Accepted Accounting Principles (GAAP). Costs are consistently applied over time and are drawn from the same period in which costs to be allocated have been incurred. Costs are not solely based on a budget or other estimates of planned activity, instead they are a measure of actual costs expended. Measuring benefits is a critical requirement and central task to be considered when allocating costs. "Direct Costs" are allocable to a particular cost objective on benefits received by that cost objective. When the direct measurement of benefit cannot be properly identified, then it is appropriate to pool those costs for later distribution. The allocation base is the mechanism used to allocate the "Indirect or Pooled Costs" to final cost objectives. The preference is to assign costs as "Direct Costs" over the use of "Indirect or Pooled Costs." If a cost objective, it is treated consistently with other costs incurred for the same purpose in like circumstance. Any cost allocated to a particular cost objective cannot be shifted to other federal grants to overcome funding deficiencies, to avoid restrictions imposed by law or grant agreement or for any other reasons. Costs prohibited by a funding source(s) cannot be paid or used as offsets. Costs that are incurred for common or joint purposes and are not readily assignable to a particular cost objective are considered "Indirect or Pooled Costs." A cost is not allocated as an "Indirect or Pooled Cost" if that cost or any other cost incurred in the same circumstance and for the same purpose has already been assigned as a "Direct Cost." Contributions to "Indirect or Pooled Costs" are limited to those costs incurred during the period of operations. Each Core, Required and Non-Required Partner pays its proportional, fair share of "Indirect or Pooled Costs," in addition to paying its proportional, fair share of "Direct Costs." Operational and infrastructure costs at American Job Centers are determined using the "occupied square footage" method which is based on actual square footage leased. **11** Operational and infrastructure costs that is included in a Core, Required and Non-Required Partners' actual square footage leased/rented amount is: Private or cubicle office space – actual square footage of being leased; **12** Common office space – usage of all communal office space, like: Resource Room; Bathrooms; and, Walkways; Utilities and maintenance; Equipment, including assessment-related products and assistive technology for individuals with disabilities; Copy machine; Postage machine and fax machine; Technology to facilitate access to regional American Job Centers, including the planning and outreach activities; Internet usage; Phone usage; Supplies, like: Hand soap, toilet paper and garbage bags; Dues, like: Chamber memberships; and, Miscellaneous – Other American Job Center-related costs

and unforeseen incidentals. These costs are determined by figuring out the percentage of actual square footage leased within the total amount of actual square footage available. Third party in-kind contributions are accepted from individuals or entities. Third party in-kind contributions can be contributions of: Space; Equipment; Technology; Non-personnel services; or, Like items

that would support costs associated with American Job Center operations. The Job Center Operator Manager and Job Center Operator Bookkeeper is responsible for tracking all vendor invoices and payments and receipts of payments made by Core, Required and Non-Required Partners on a monthly basis. Payments are appropriately charged off to the American Job Center's operational and infrastructure budgets. A Core, Required or Non-Required Partner may request to review any American Job Center-related invoice, bill or fee at any time. The request is to be made in writing to the Job Center Operator Manager. A Core, Required and Non-Required Partner's agreed upon monthly charge is "fixed" throughout the program year unless a modification to the total "fixed" charge amount is requested by a Core, Required or Non-Required Partner and is approved by the NPWDB, Inc. and the Job Center Operator Manager or if the NPWDB, Inc. and Job Center Operator Manager requests a necessary modification to the total "fixed" cost amount that supports an immediate decrease or increase in a Core, Required or Non-Required Partner's total "fixed" cost amount. If this is the case, the NPWDB, Inc. and Job Center Operator Manager must show proper hard copy documentation that supports the need for the decrease or increase. Any and all fiscal transactions between Job Center Operator Staff and Core, Required or Non-Required Partners must be completed within thirty (30) calendar days after the end of the program year. The Job Center Operator Manager provides each Core, Required and Non-Required Partner with a year-to-date Budget and Expenditure Report for the American Job Center(s) it is directly contributing to no less than once a quarter.

Z) A Description of the Local Board's (or Fiscal Agent's) Procedures for collecting Debts/Disallowed Costs involving WIOA Funds.

All good faith efforts are made to collect a disallowed cost. Collection of a disallowed cost from a Sub-Grantee, Contractor or Vendor is made to the NPWDB, Inc. by direct payment prior to the close of the Program Year for which the disallowed cost occurred. Workforce Innovation & Opportunity Act (WIOA) Program funds are not used to pay a disallowed cost. Liens will be placed on the assets of any Sub-Grantee, Contractor or Vendor who fails to repay a disallowed cost. A Sub-Grantee, Contractor or Vendor who fails to repay a disallowed cost will be forbidden from participating in any future WIOA funded programs operated and sponsored by the NPWDB, Inc.

1 The NPWDB, Inc. solicited RFPs for management/oversight of an OJT Program in the region. There were no responses received during the solicitation period. Subsequently, the NPWDB, Inc. will request the Governor of West Virginia name it the Provider of the OJT Program in the region.

2 The Board of Directors may award Grants or Contracts on a sole source basis if the Board of Directors determines there is a sufficient number of eligible Providers of Youth Programs and Services in the local area.

3 Core and Required Partners contributed to the development of the draft Local Plan prior to it being made public.

4 Mileage to and from residence to work will not be paid.

5 Examples of "significant leases" are NPWDB, Inc. and American Job Center office space leases. Examples of "less significant leases" are sub-leases with Core and Required Partners located at American Job Centers.

6 If an ITA participant leaves a training program between disbursement periods, the balance of costs due will be prorated.

7 The Executive Director submits Timesheets and monthly Itinerary Forms to the Chairman of the Board of Directors for review and approval at the end of each month. The Chairman verifies the accuracy of Timesheets and Itinerary Forms. Timesheets and monthly Itinerary Forms are signed off on by the Chairman.

8 Paychecks will not be given to anyone other than the individual it is written for.

9 Sub-Grantees, Contractors and Training Providers are paid on a reimbursement basis or on a pay-for-performance basis as outlined in their contractual agreements.

10 The Cost Allocation Plan for American Job Centers is approved by a majority of Core and Required Partners prior to implementation. Any modifications made to the Cost Allocation Plan in the future is approved by a majority of Core and Required Partners. Job Center Operator costs are allocated based on benefit received and charged to each program component (Adult, Dislocated Worker, Youth) based on number of participants served at the regional American Job Centers.

11 Core and Required Partners are not required to cover personnel costs at the American Job Center in Wheeling. However, Non-Required Partners may be asked to help cover personnel costs at any regional American Job Center. However, Core and Required Partners may contribute to personnel costs, in addition to infrastructure costs, at other American Job Centers in the region if they so choose.

12 The NPWDB, Inc. uses the official blue print office space specifications provided by the appropriate landlords of regional American Job Centers to determine square footage of office spaces, private, cubicle and common, being requested for usage. Based on cost methodology detailed in the CAP, a private office space, office space with a locked door, cost more than cubicle office space, office space that is simply partitioned off.



**IF YOU WOULD LIKE TO REVIEW ATTACHMENTS TO
THE LOCAL PLAN OR IF YOU HAVE ANY QUESTIONS
OR COMMENTS ABOUT THE LOCAL PLAN
PLEASE CONTACT:**

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