DRAFT WIOA State Plan
2020 – 2024

For Public Comment

Note: Formatting and layout will be enhanced in the final version.

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I. WIOA STATE PLAN TYPE

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

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

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

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

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

Executive Summary

Changing Maryland for the Better

Providing businesses with the skilled workforce required to compete in global, regional, and local economies is central to Governor Hogan's strategic vision for Maryland and his charge to ensure that the State is "open for business." Maryland's workforce system provides that talent pipeline through the collaboration of State and local agencies, businesses, economic development, education, and community stakeholders.

The Workforce Innovation and Opportunity Act (WIOA) is the federal law that governs Maryland's workforce system. WIOA is designed to integrate services to support both businesses and jobseekers through strategic cross-sector partnerships. It envisions connecting workforce, education, human services, and economic development entities to ensure strategic leveraging of resources and optimum results. The law addresses the needs of customers through establishing a comprehensive system that provides access to employment, education, training and support services. Through the American Job Centers (AJCs), WIOA works to prepare a trained and competitive workforce to meet the demands of employers and the labor market.

To establish the high quality network envisioned under WIOA, in 2016, Governor Hogan directed relevant Maryland agencies to jointly develop the State's workforce plan. This marked the first time that Maryland's Department of Labor (MD Labor), the Department of Human Services (DHS), the Maryland State Department of Education (MSDE), the Governor's Workforce Development Board (GWDB), and local workforce partners collaborated to develop the operational components of Maryland's workforce system. The Governor's charge to these stakeholders was to develop a plan that maximized state resources in order to deliver outstanding customer service to the workers and businesses that are vital to Maryland's economic growth and prosperity.

During its first two years of implementation, Maryland successfully launched an integrated workforce network that ensures citizens have access to quality occupational training and employment opportunities. In 2018, the Department of Housing and Community Development's (DHCD) Community Services Block Grant program, the MD Labor Division of Unemployment Insurance (DUI), and the Senior Community Services Employment Program (SCSEP) were formally added into Maryland's Combined Plan. Recognizing that no single entity can exclusively provide *all* services to a customer, this more inclusive approach will diversify services and invest in new, integrated practices that surpass the traditional expectations of a workforce system.

As Maryland seeks to strengthen and enhance its practices through the implementation of this revised State Plan, success will require a commitment to innovation and collaboration, and a cohesive approach among the abovementioned partners. Governor Hogan's principles of economic development and jobs, government reform, and improving the quality of life for Marylanders, the GWDB, WIOA Alignment Group, and additional network contributors developed the *Benchmarks of Success for Maryland's Workforce System.* The *Benchmarks* are a foundational outline used to build system effectiveness, support transparency about progress, and help State and local WIOA partners align resources and strategies with the vision and mission articulated in this Plan.

Maryland's core partners are committed to implementing the *Benchmarks of Success for Maryland's Workforce System,* which reflect a shared vision of excellence and provide a strategic tool for continuous improvement.

The *Benchmarks of Success* are built around five major strategic goals:

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

Maryland's workforce system uses the *Benchmarks of Success* as a framework, guiding the shared goals and activities of the WIOA system. The *Benchmarks* allow partners to think systematically about how workforce services are delivered, whether services are reaching priority populations, and where to eliminate existing gaps to build a more prepared, responsive workforce for Maryland's businesses.

Commonly Used Abbreviations

2Gen	Two Generation
AELS	Adult Education and Literacy Services
AJC	American Job Center
AMP	Apprenticeship Maryland Program
BACH	Baltimore Alliance for Careers in Healthcare
CAA	Community Action Agency
CRP	Community Rehabilitation Program
DHS	Department of Human Services
DHCD	Department of Housing and Community Development
DORS	Division of Rehabilitation Services
DPSCS	Department of Public Safety and Correctional Services
DUI	Division of Unemployment Insurance
DWDAL	Division of Workforce Development and Adult Learning
EARN	Employment Advancement Right Now
ETPL	Eligible Training Provider List
FIA	Family Investment Administration
FLC	Foreign Labor Certification
FY	Fiscal Year
GWDB	Governor's Workforce Development Board
JVSG	Jobs for Veterans State Grant
LACES	Literacy, Adult and Community Education System

LDSS	Local Departments of Social Services
LEP	Limited English Proficiency
LMI	Labor Market Information
Local Area	Local Workforce Development Area
Local Board	Local Workforce Development Board
LSS	Local School Systems
LVER	Local Veterans Employment Representative
LQ	Location Quotient
MD Labor	Maryland Department of Labor
MD THINK	Maryland's Total Human Services Information Network
MORA	Maryland Office for Refugees and Asylees
MSDE	Maryland State Department of Education
MSFW	Migrant and Seasonal Farmworker
MWA	Maryland Workforce Association
MWE	Maryland Workforce Exchange
NRS	National Reporting System
OFP	Office of Fair Practices
OWD	Office of Workforce Development
OWIP	Office of Workforce Information and Performance
PII	Personally Identifiable Information
PIRL	Participant Individual Record Layout
POAC	Professional Outplacement Assistance Center
Pre-ETS	Pre-Employment Transitioning Services
PY	Program Year
RA	Registered Apprenticeship
RESEA	Reemployment Services and Eligibility Assessment
RFP	Request for Proposals
REO	Reentry Employment Opportunities
ROW	Reemployment Opportunity Workshop
SCSEP	Senior Community Service Employment Program
SSN	Social Security Number
TANF	Temporary Assistance for Needy Families
TCA	Temporary Cash Assistance
UI	Unemployment Insurance
USDOL	United States Department of Labor
VR	Vocational Rehabilitation
WIOA	Workforce Innovation and Opportunity Act
WPR	Work Participation Rate

II. STRATEGIC ELEMENTS

Economic and Workforce Analysis

(a) Economic, Workforce, and Workforce Development Activities Analysis. The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate.

(1) Economic and Workforce Analysis

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

(A) Economic Analysis.

In 2018, Maryland's real GDP increased by 2.5 percent, continuing a trend of steady economic growth over the past decade. This success was shared broadly; of Maryland's 18 major industries, 17 experienced growth. Professional, scientific, and technical services; manufacturing; and information drove the bulk of growth in Maryland's GDP in 2018. Combined, these industries accounted for 61.5 percent of annual growth. In the same period, the United States' GDP grew at a rate of 2.9 percent. The management of companies and enterprises industry also shone brightly, leading all industries with an 11 percent annual growth rate. The table below shows the size and growth rate for each of Maryland's major industries (sectors representing at least one percent of the state's GDP) in 2018.

Table: Industry GDP and growth rate

Industry	**GDP**	**Annual Growth**
Maryland Total	*368,860*	*2.5%*
Utilities	6,743	0.3%
Construction	14,174	-1.6%
Manufacturing	22,633	5.3%
Wholesale trade	16,480	2.1%
Retail trade	19,501	2.7%
Transportation and warehousing	7,861	5.7%
Information	19,815	8.2%
Finance and insurance	17,400	0.7%
Real estate and rental and leasing	60,062	2.5%
Professional, scientific, and technical services	39,006	4.4%
Management of companies and enterprises	4,790	11.0%
Administrative, support, waste mgmt., remediation services	11,191	2.7%
Educational services	5,740	3.0%
Health care and social assistance	28,327	2.7%

Industry	GDP	Annual Growth
Arts, entertainment, and recreation	3,921	2.2%
Accommodation and food services	9,465	1.5%
Other services	7,984	3.1%
Government and government enterprises	73,027	0.5%

Notes: GDP is reported in millions of chained 2012 U.S. dollars.

Maryland's economy is relatively insulated from exposure to international trade, but it is also an area of growing strength. State industries accounted for 0.7 percent of total US exports in 2018. The state's $12.1 billion in exports represents a 29.9 percent growth over the prior year.

Buoyed by broad economic growth, Maryland's labor force saw a number of gains. In 2018, Maryland's unemployment rate continued to trend down. At a 3.9 percent unemployment rate, more Marylanders had jobs than ever before. The 3.07 million employed in 2018 represented an increase in the average employment level of nearly 14,000 individuals over the prior year, and a 7.6 percent decrease in the number of unemployed.

Employment in the education services industry rose the fastest of all industries in 2018, with a 4.6 percent annual growth. The health care and social assistance industry added the most jobs with 7,900 jobs added during the year. The table below gives the employment level (in thousands of jobs) and annual growth rate by industry, excluding the farming industry, which is not tracked, and industries employing less than one percent of the population.

Table: Employment by industry, annual average

Industry	Employment	Annual Growth
Construction	163.1	0.4%
Manufacturing	108.3	1.2%
Wholesale trade	85.3	0.7%
Retail trade	284.8	-1.5%
Transportation and warehousing	87.6	3.2%
Information	36.5	-2.7%
Finance and insurance	97.5	-0.8%
Real estate and rental and leasing	46.9	-2.3%
Professional, scientific, and technical services	251.2	1.2%
Management of companies and enterprises	27.4	0.7%
Administrative, support, waste mgmt., remediation services	172.3	1.8%
Educational services	92.6	4.6%
Healthcare and social assistance	378.8	2.1%
Arts, entertainment, and recreation	46.8	1.3%
Accommodation and food services	234.8	0.3%
Other services	114.7	0.7%

Industry	Employment	Annual Growth
Government and government enterprises	504.6	0.1%

Note: employment reported in thousands of jobs. Only non-farm industries with employment of at least one percent of workforce included.

With fewer individuals looking for jobs in 2018, businesses worked harder to fill vacancies, and incomes also rose. The median household income in Maryland rose by over $4,000 dollars from 2017 to 2018 (inflation adjusted), a 5.0 percent increase. At $86,000, the state ranks second among all states for median household income.

Amidst a historically long period of steady economic expansion, a variety of industries and occupations in Maryland have growing needs for a talented workforce. The following sections divide these industries and occupations into two categories: existing and emerging in-demand areas.

Existing in-demand areas are defined as growing industries and occupations that make up a relatively large share of the economy and workforce, compared to the U.S. as a whole. These areas represent places where Maryland is already strong and becoming stronger. Emerging in-demand areas are defined as growing industries and occupations that make up a small share of the workforce, relative to the US. Emerging in-demand areas have relatively low employment but are becoming a more significant part of the state's economy.

(i) Existing Demand Industry Sectors and Occupations. Provide an analysis of the industries and occupations for which there is existing demand.

Maryland's existing in-demand industries

In 2018, Maryland businesses added 19,100 new jobs. The healthcare and social assistance industry sector saw the largest gain, adding 7,900 jobs. Other industry sectors posting strong gains included Educational services (4,100) and Administrative and support and waste management and remediation services (3,100).

While the composition of Maryland's economy remained largely the same from 2017 to 2018, the share of GDP attributed to the government sector decreased from 20.0 percent to 19.7 percent. Professional, scientific, and technical services increased its share of Maryland's GDP by 0.3 percentage points from 10.4 percent to 10.7 percent.

Eighteen Maryland industries are classified as existing in-demand industries using the growth in private employment and a measure of industry concentration in 2018. The largest of these industries was Professional and technical services, which employed 252,292 workers in 2018, a growth of 2.0 percent over the previous year. The fastest growing of the existing in-demand industries was Warehousing and storage after an 18.8 percent expansion in employment.

Industries with growth in employment and a higher than average employment concentration within Maryland are considered existing in-demand industries. The table below lists existing in-demand

industries with employment above 10,000 in 2018. Location Quotient (LQ) is used to measure industry concentration and help determine whether an industry is an existing in-demand industry. At the state level, LQ is defined as the share of Maryland employment in a particular industry to the national share of employment in that industry. A higher LQ indicates that an industry is a relatively larger share of Maryland's economy compared to the U.S. economy.

Table: Existing in-demand industries

Industry	Establishments	Employment	Location Quotient	Employment Change
Professional and technical services	29,868	252,292	1.5	2.0%
Administrative and support services	11,650	164,016	1.0	1.1%
Ambulatory health care services	12,876	146,746	1.1	3.3%
Specialty trade contractors	9,954	109,918	1.3	2.6%
Hospitals	275	106,472	1.2	0.1%
Nursing and residential care facilities	1,659	70,789	1.2	1.1%
Educational services	2,963	69,417	1.3	3.8%
Amusements, gambling, and recreation	1,597	37,255	1.2	2.1%
Construction of buildings	5,703	36,335	1.2	0.7%
Real estate	5,870	34,964	1.2	1.6%
Personal and laundry services	4,339	32,667	1.2	0.7%
Membership associations and organizations	3,431	26,740	1.1	1.4%
Warehousing and storage	279	21,917	1.1	18.8%
Computer and electronic product manufacturing	437	20,233	1.0	6.6%
Couriers and messengers	369	14,959	1.1	7.2%
Transit and ground passenger transportation	701	12,100	1.4	0.9%

Source: Quarterly census of employment and wages, and calculations by MD Labor.

Regional existing in-demand industries

Maryland's Local Areas have historically entered into agreements wherein they developed regions and produced plans to regionally target various industry sectors. Maryland's workforce areas include:

- Anne Arundel County;
- Baltimore City;
- Baltimore County;
- Frederick County;

- Lower Shore (made up of Wicomico, Somerset, and Worcester Counties);
- Mid-Maryland (made up of Carroll and Howard Counties);
- Montgomery County;
- Prince George's County;
- Southern Maryland (made up of Charles, Calvert, and St. Mary's Counties);
- Susquehanna (made up of Harford and Cecil Counties);
- Upper Shore (made up of Kent, Queen Anne's, Talbot, Caroline, and Dorchester Counties); and
- Western Maryland (made up of Garrett, Allegany, and Washington Counties).

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

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

Using the growth in private employment from 2017 to 2018 in combination with LQs greater than one, 16 existing in-demand industries were identified in the Capital region, 25 in the Central region, 22 in the Eastern Shore region, 12 in the Southern Maryland region, and 18 in the Western Maryland region. The following tables (Tables 3a-3e) show existing in-demand industries for each region that make up more than 0.25 percent of the region's employment.

The largest growth industry in the Capital region is Professional and technical services, employing 101,492 workers after growing at a rate of 1.2 percent from 2017 to 2018. In the Central region, Administrative and support services grew by 0.4 percent to employ 89,562 workers in 2018. 8,292 workers were employed in Ambulatory health care services, the Eastern Shore's largest growth industry. Professional and technical services was also the largest growth industry in Southern Maryland, with 12,145 workers in 2018. The largest Western Maryland growth industry was Credit intermediation and related activities with 5,968 workers, an expansion of 18.9 percent over 2017.

Table: Existing in-demand industries – Capital Region

Industry	Establishments	Employment	Location Quotient	Employment Change
Professional and technical services	10,253	101,492	1.3	1.2%
Administrative and support services	3,726	53,963	1.1	0.3%

Industry	Establishments	Employment	Location Quotient	Employment Change
Ambulatory health care services	5,180	50,202	1.0	4.1%
Specialty trade contractors	3,200	42,248	1.2	3.8%
Nursing and residential care facilities	515	24,171	1.0	5.5%
Construction of buildings	2,152	15,544	1.3	2.7%
Membership associations and organizations	1,118	14,737	1.5	28.7%
Real estate	2,289	14,654	1.3	0.4%
Motor vehicle and parts dealers	530	13,214	1.1	0.3%
Personal and laundry services	1,593	11,487	1.0	0.6%
Building material and garden supply stores	332	9,240	1.1	5.4%
Couriers and messengers	143	5,806	1.2	7.4%
Rental and leasing services	320	5,011	1.3	5.4%
Waste management and remediation services	151	3,368	1.1	10.8%
Data processing, hosting and related services	91	1,868	1.7	5.3%
Textile product mills	26	336	1.2	18.1%

Table: Existing in-demand industries – Central Region

Industry	Establishments	Employment	Location Quotient	Employment Change
Administrative and support services	5,031	89,562	1.1	0.4%
Hospitals	162	75,438	1.3	5.5%
Educational services	1,248	47,467	1.3	4.8%
Social assistance	1,599	29,214	1.0	3.5%
Merchant wholesalers, durable goods	1,982	25,021	1.1	2.7%
Amusements, gambling, and recreation	850	21,234	1.0	2.9%
Merchant wholesalers, nondurable goods	897	20,435	1.2	13.7%
Insurance carriers and related activities	1,644	20,251	1.2	2.0%
Warehousing and storage	173	19,274	1.5	21.0%
Management of companies and enterprises	307	15,050	1.0	13.0%
Repair and maintenance	2,165	13,599	1.0	0.8%
Computer and electronic product manufacturing	198	13,198	1.2	22.7%
Food manufacturing	221	10,489	1.2	7.9%
Truck transportation	886	9,850	1.1	7.6%

Industry	Establishments	Employment	Location Quotient	Employment Change
Heavy and civil engineering construction	380	9,482	1.1	2.1%
Support activities for transportation	400	7,308	1.2	8.1%
Utilities	85	6,793	1.1	24.9%
Air transportation	27	5,314	1.7	2.9%
Performing arts and spectator sports	365	5,229	1.2	11.1%
Plastics and rubber products manufacturing	74	4,819	1.5	2.5%
Transportation equipment manufacturing	56	3,322	1.4	11.6%
Miscellaneous manufacturing	200	3,156	1.2	2.1%
Electrical equipment and appliance mfg.	53	1,364	1.3	1.5%
Museums, historical sites, zoos, and parks	51	1,324	1.3	0.2%
Primary metal manufacturing	18	711	1.6	2.8%

Table: Existing in-demand industries – Eastern Shore Region

Industry	Establishments	Employment	Location Quotient	Employment Change
Ambulatory health care services	722	8,292	1.0	5.6%
Accommodation	193	4,397	2.5	3.4%
General merchandise stores	107	3,958	1.4	0.5%
Food manufacturing	65	3,241	3.6	2.3%
Amusements, gambling, and recreation	178	2,983	1.4	7.9%
Motor vehicle and parts dealers	171	2,553	1.2	7.4%
Merchant wholesalers, nondurable goods	167	2,066	1.2	2.2%
Truck transportation	196	1,893	2.0	32.4%
Repair and maintenance	334	1,717	1.3	0.9%
Building material and garden supply stores	120	1,671	1.2	7.2%
Health and personal care stores	144	1,368	1.2	5.3%
Gasoline stations	134	1,210	1.8	0.2%
Fabricated metal product manufacturing	34	1,122	2.5	2.4%
Chemical manufacturing	24	1,088	1.5	1.6%
Heavy and civil engineering construction	81	1,041	1.1	16.9%
Paper manufacturing	5	857	4.4	4.6%
Non-store retailers	53	673	2.2	3.1%

Machinery manufacturing	20	443	1.1	0.5%
Wood product manufacturing	19	431	3.1	3.2%
Transportation equipment manufacturing	21	398	1.6	22.3%
Beverage and tobacco product manufacturing	19	395	1.9	7.4%
Nonmetallic mineral product manufacturing	18	305	1.4	4.0%

Table: Existing in-demand industries – Southern Maryland Region

Industry	**Establishments**	**Employment**	**Location Quotient**	**Employment Change**
Professional and technical services	1,022	12,145	1.4	5.9%
Specialty trade contractors	705	5,698	1.4	0.6%
Food and beverage stores	218	4,063	1.6	4.1%
General merchandise stores	62	3,624	1.8	4.3%
Nursing and residential care facilities	101	3,020	1.1	11.9%
Support activities for transportation	57	1,652	4.0	4.9%
Utilities	16	1,627	3.9	3.7%
Building material and garden supply stores	73	1,479	1.6	1.5%
Repair and maintenance	212	1,174	1.3	1.4%
Health and personal care stores	116	962	1.3	10.8%
Miscellaneous store retailers	107	755	1.3	3.2%

Table: Existing in-demand industries – Western Maryland Region

Industry	**Establishments**	**Employment**	**Location Quotient**	**Employment Change**
Credit intermediation and related activities	172	5,968	3.2	18.9%
General merchandise stores	70	3,082	1.4	4.2%
Social assistance	147	2,518	1.1	1.2%
Couriers and messengers	37	2,174	3.4	1.4%
Furniture and related product manufacturing	18	2,151	12.2	10.4%
Truck transportation	142	2,107	2.8	9.8%
Merchant wholesalers, durable goods	160	2,079	1.1	13.5%
Machinery manufacturing	14	2,071	6.8	6.7%
Building material and garden supply stores	81	2,061	1.9	6.5%
Gasoline stations	88	1,521	2.9	4.4%
Accommodation	66	1,403	1.0	1.5%

Industry	Establishments	Employment	Location Quotient	Employment Change
Merchant wholesalers, nondurable goods	77	1,402	1.0	35.4%
Fabricated metal product manufacturing	35	935	2.6	5.3%
Plastics and rubber products manufacturing	11	808	3.1	2.7%
Printing and related support activities	14	612	1.8	2.0%
Beverage and tobacco product manufacturing	15	474	2.9	6.0%
Broadcasting, except internet	11	348	2.0	8.5%
Wood product manufacturing	20	275	2.5	0.6%

Maryland's existing in-demand occupations

Based on Maryland's occupational employment growth from 2016 to 2018 and a measure of the State's occupational concentration, 12 major occupational clusters are in demand. Management jobs lead the list. With a significant concentration of employment within the state (163,380 employed; 1.2 LQ), high median wage ($118,442), and rapid employment growth (3.6 percent from 2016 to 2018), managers are experiencing high and growing demand. Most other existing in-demand occupations require some type of STEM background. With high wages and employment growth, these occupations represent significant opportunities for workers with the proper training and areas where companies are experiencing growing demand.

Occupational demand cannot be measured directly with available data. However, similar to existing in-demand industries, emerging in-demand occupations are defined as occupations with positive growth in employment and a higher than average employment concentration within Maryland. The table below lists existing in-demand occupations in 2018. LQ is used to measure occupation concentration and help determine whether an occupation is an existing in-demand occupation. At the state level, LQ is defined as the share of Maryland employment in a particular occupation to the national share of employment in that occupation. A higher LQ indicates that an occupation is performed by a relatively larger share of Maryland's workforce compared to the U.S. workforce.

Table: Maryland's existing in-demand occupations

Occupation Cluster	Employment (2018)	Median Wage	Employment Growth	LQ
Management	163,380	$118,442	3.6%	1.2
Business and financial operations	167,260	$ 76,210	0.9%	1.2
Computer and mathematical	128,230	$ 97,855	2.1%	1.6
Architecture and engineering	60,480	$ 91,537	2.1%	1.3
Life, physical, and social science	41,280	$ 88,148	0.6%	1.9
Community and social service	43,090	$ 49,012	1.7%	1.1

Occupation Cluster	Employment (2018)	Median Wage	Employment Growth	LQ
Legal	25,320	$ 69,974	1.5%	1.2
Education, training, and library	176,170	$ 58,517	0.7%	1.1
Healthcare practitioners and technical	173,210	$ 74,507	1.8%	1.1
Protective service	73,200	$ 46,305	0.6%	1.1
Building and grounds cleaning and maintenance	85,930	$ 28,012	0.5%	1.0
Construction and extraction	118,520	$ 46,328	1.8%	1.1

Source: U.S. Bureau of Labor Statistics, Occupational and employment statistics.

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

Maryland's emerging in-demand industries

Maryland's diverse and growing economy supports the development of many emerging in-demand industries. In complement to the existing in-demand industries in the previous section, industries with positive 2018 growth in employment and a lower employment concentration within Maryland are considered emerging in-demand industries. Thirty-two industries meet this definition, led by the food service and drinking places industry, which employed 206,248 individuals in 2018. Other notable emerging in-demand industries include merchant wholesalers of nondurable goods, which saw a 10.1 percent increase in employment compared to 2017, and the management of companies and enterprises industry, which, despite being a relatively small share of Maryland's economy, saw employment grow by 6.5 percent in 2018.

The table below lists existing in-demand industries with employment above 5,000 in 2018. LQ is used to measure industry concentration and help determine whether an industry is an emerging in-demand industry. At the state level, an industry LQ is defined as the share of Maryland employment in the industry compared to the national share of employment in that industry. A lower LQ indicates that an industry is a relatively smaller share of Maryland's economy compared to the U.S. economy.

Table: Emerging in-demand industries

Industry	Establishments	Employment	Location quotient	Employment growth
Food services and drinking places	11,442	206,248	1.0	0.3%
General merchandise stores	967	52,008	0.9	1.9%
Social assistance	3,084	51,904	0.7	2.0%
Merchant wholesalers, durable goods	4,116	44,103	0.8	3.1%
Merchant wholesalers, nondurable goods	1,884	31,396	0.8	10.1%
Management of companies and enterprises	716	27,381	0.6	6.5%

Building material and garden supply stores	1,012	23,312	1.0	1.9%
Securities, commodity contracts, investments	1,945	16,499	1.0	2.9%
Truck transportation	1,750	16,309	0.6	2.3%
Food manufacturing	464	15,842	0.5	1.5%
Chemical manufacturing	293	13,159	0.9	3.2%
Gasoline stations	1,385	11,524	0.7	0.4%
Support activities for transportation	714	10,955	0.8	5.9%
Publishing industries, except internet	863	9,553	0.7	0.1%
Performing arts and spectator sports	772	8,264	0.9	5.2%
Fabricated metal product manufacturing	440	8,206	0.3	0.5%
Machinery manufacturing	237	7,078	0.4	5.5%
Plastics and rubber products manufacturing	113	5,998	0.5	5.0%
Air transportation	60	5,923	0.6	2.7%
Non-store retailers	784	5,575	0.5	5.6%

Source: Quarterly Census of Employment and Wages, calculations by MD Labor.

Regional emerging in-demand industries

Using the growth in private employment from 2017 to 2018 in combination with the LQs less than or equal to one, 19 emerging industries were identified in the Capital region, 29 in the Central region, 17 in the Eastern Shore region, and 11 each in the Southern Maryland and Western Maryland Regions.

The following tables list these industries that also employ more than a 0.25 percent of the respective region's workforce. In the Capital region, the largest of these industries was Hospitals with a 2018 employment level of 20,838 workers. It grew at a rate of 0.6 percent from 2017 to 2018. Professional and technical services was the largest industry in the Central Region with 2018 employment of 119,300 workers after a growth of 1.5 percent from 2017. Hospitals was also the largest emerging industry on the Eastern Shore, with 5,898 workers in 2018. In Southern Maryland, Ambulatory health care services employed 5,335 workers in 2018, making it the largest of the emerging industries in this region. 3,100 people worked in the Specialty Trade contractors, the largest emerging industry in the Western Maryland region.

Table: Emerging in-demand industries – Central Region

Industry	**Establishments**	**Employment**	**Location Quotient**	**Employment Growth**
Hospitals	74	20,838	0.6	0.6%
Educational services	1,092	17,755	0.8	8.4%
Social assistance	1,152	17,705	1.0	5.6%

Industry	Establishments	Employment	Location Quotient	Employment Growth
General merchandise stores	305	16,851	1.0	2.5%
Amusements, gambling, and recreation	476	11,239	0.9	2.1%
Merchant wholesalers, nondurable goods	456	7,175	0.7	11.7%
Health and personal care stores	801	6,663	1.0	3.7%
Computer and electronic product manufacturing	134	6,104	0.9	2.6%
Transit and ground passenger transportation	154	3,547	0.9	4.6%
Truck transportation	466	3,306	0.6	9.7%

Table: Emerging in-demand industries – Capital Region

Industry	Establishments	Employment	Location Quotient	Employment Growth
Professional and technical services	11,950	119,300	0.9	1.5%
Food services and drinking places	6,138	108,429	0.9	0.4%
Ambulatory health care services	6,186	78,342	1.0	3.0%
Specialty trade contractors	4,646	54,725	0.9	4.9%
Nursing and residential care facilities	892	37,260	0.9	1.9%
Motor vehicle and parts dealers	871	18,171	0.9	2.0%
Personal and laundry services	2,278	17,820	1.0	3.7%
Real estate	2,951	17,432	0.9	4.4%
Construction of buildings	2,680	16,500	0.8	2.2%
Accommodation	352	12,786	0.8	24.9%
Membership associations and organizations	1,427	12,271	0.8	5.2%
Health and personal care stores	1,149	10,438	1.0	8.4%
Building material and garden supply stores	507	10,211	0.8	2.3%
Couriers and messengers	170	6,093	0.8	7.3%
Chemical manufacturing	140	5,884	0.8	1.0%
Furniture and home furnishings stores	463	5,570	1.0	4.6%
Gasoline stations	700	5,460	0.8	4.2%
Waste management and remediation services	309	4,747	1.0	0.8%
Fabricated metal product manufacturing	254	4,174	0.9	4.9%
Printing and related support activities	219	3,694	0.9	12.1%
Machinery manufacturing	117	3,587	0.9	3.4%

Table: Emerging in-demand industries – Eastern Shore Region

Industry	Establishments	Employment	Location Quotient	Employment Growth
Hospitals	16	5,898	1.0	2.7%
Specialty trade contractors	869	5,341	0.9	7.6%
Administrative and support services	612	5,241	0.6	3.5%
Professional and technical services	985	5,004	0.4	5.6%
Social assistance	158	2,645	0.9	4.5%
Educational services	114	2,306	0.6	5.8%
Merchant wholesalers, durable goods	235	2,239	1.0	0.4%
Credit intermediation and related activities	219	1,871	0.8	2.7%
Real estate	442	1,625	0.8	5.2%
Construction of buildings	420	1,539	0.8	5.8%
Insurance carriers and related activities	157	1,381	0.8	11.5%
Computer and electronic product manufacturing	28	658	0.6	25.9%
Couriers and messengers	17	508	0.6	13.9%
Support activities for transportation	36	494	0.8	27.2%
Warehousing and storage	25	418	0.3	15.0%
Waste management and remediation services	42	366	0.7	5.7%

Table: Emerging in-demand industries – Southern Region

Industry	Establishments	Employment	Location Quotient	Employment Growth
Ambulatory health care services	587	5,335	1.0	4.1%
Social assistance	152	1,742	0.9	2.5%
Amusements, gambling, and recreation	76	1,069	0.8	8.3%
Educational services	95	1,033	0.4	4.9%
Merchant wholesalers, durable goods	108	784	0.5	1.7%
Management of companies and enterprises	24	571	0.5	39.0%
Membership associations and organizations	92	523	0.5	12.9%
Furniture and home furnishings stores	40	382	0.9	2.5%
Waste management and remediation services	38	319	0.9	4.6%
Truck transportation	57	297	0.5	13.4%
Couriers and messengers	6	294	0.5	1.7%

Table: Emerging in-demand industries – Western Region

Industry	Establishments	Employment	Location quotient	Employment growth
Specialty trade contractors	377	3,100	0.6	4.7%
Construction of buildings	245	1,469	0.9	8.3%
Insurance carriers and related activities	107	847	0.6	3.6%
Repair and maintenance	175	840	0.8	1.8%
Membership associations and organizations	125	830	0.6	4.0%
Food manufacturing	26	577	0.8	10.0%
Furniture and home furnishings stores	51	438	0.9	3.8%
Rental and leasing services	49	429	0.8	0.3%
Heavy and civil engineering construction	36	373	0.5	20.0%
Waste management and remediation services	25	346	0.9	3.4%
Utilities	10	314	0.7	5.4%

Maryland's emerging in-demand occupations

Using the occupational growth from 2016 to 2018 in combination with LQ less than or equal to one, nine major occupation clusters were identified for Maryland. While experiencing strong employment growth, these occupations tend to be relatively lower paying compared to the state's median wage. Personal care and service occupations grew at 5.4 percent, the fastest rate among emerging in-demand occupations, it was the occupation that also added the most employment adding 13,550 workers between 2016 and 2018.

In complement to existing in-demand occupations, emerging in-demand occupations are defined as occupations with positive growth in employment and relatively low employment concentration within Maryland. The table below lists emerging in-demand occupations in 2018. LQ is used to measure occupation concentration and help determine whether an occupation is an existing in-demand occupation. At the state level, LQ is defined as the share of Maryland employment in a particular occupation to the national share of employment in that occupation. A lower LQ indicates that an occupation is performed by a relatively smaller share of Maryland's workforce compared to the U.S. workforce.

Table: Maryland's emerging in-demand occupations

Occupation cluster	Employment (2018)	Median Wage	Employment Growth	LQ
Arts, design, entertainment, sports, and media	32,110	$ 51,819	1.5%	0.9
Healthcare support	74,760	$ 31,726	1.2%	1.0
Food preparation and serving related	225,040	$ 22,960	1.8%	0.9

Occupation cluster	Employment (2018)	Median Wage	Employment Growth	LQ
Personal care and service	92,370	$ 24,820	5.4%	0.9
Farming, fishing, and forestry	2,620	$ 31,051	3.3%	0.3
Installation, maintenance, and repair	104,250	$ 49,887	1.2%	1.0
Production	80,640	$ 36,383	1.2%	0.5
Transportation and material moving	164,620	$ 34,700	1.8%	0.9

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

Maryland's employers posted more than 900,000 jobs online in 2018. With 102,643 job openings posted, health care practitioner occupations were the most recruited occupational cluster. Computer and mathematical occupations (100,554) and management occupations (73,260) were the next most sought after. These numbers are on par with jobs postings from previous years. The table below lists the occupations most frequently recruited via online job advertisements in 2018. This data comes from the Maryland Workforce Exchange (MWE) and includes job postings to all major job boards, such as Monster.com and Indeed.

Table: Top advertised job openings by occupation

Occupation group	Job postings	Mean wage
Healthcare practitioners and technical	102,643	$73,518
Computer and mathematical	100,554	$96,072
Management	73,260	$86,352
Office and administrative support	58,109	$37,481
Sales and related	38,816	$54,625
Architecture and engineering	38,793	$91,253
Business and financial operations	37,909	$68,374
Transportation and material moving	32,916	$40,243
Food preparation and serving related	19,517	$37,399
Installation, maintenance, and repair	18,983	$48,929

The most desired certifications in online job postings include several used in health care practitioner occupations, two for IT occupations, one for transportation occupations, and one for business and financial services. The table below lists these most frequently requested.

Table: Top certification group by 2018 advertised job openings

Advertised Certification Group	Job Openings
Advanced Cardiac Life Support Certification (ACLS)	7,613
Registered Nurse (RN)	7,492
Certification in Cardiopulmonary Resuscitation (CPR)	6,982

Advertised Certification Group	Job Openings
(ISC)² Certifications	3,148
Cisco Associate Certifications	1,991
CompTIA Certifications	1,894
Commercial Driver's License (CDL)	1,823
Certified Nursing Assistant (CNA)	1,624
Certified Public Accountant (CPA)	1,529
Basic Life Support (BLS) Certification	1,443

Job openings are available for a range of education levels. The table below lists the 15 occupation/school education level combinations with the greatest number of job openings in 2018. For example, the most frequently posted occupation/education combination was for computer and mathematical jobs postings that required a bachelor's degree. Of these 15 most frequently recruited occupation/education groups, four have no minimum education requirements, six required a high school diploma or equivalent, and five requested at least a bachelor's degree to qualify for a job. Note that professional credentials and certifications are not considered in determining these groups. So while there were 7,207 jobs posted for healthcare practitioners with no minimum education requirement, many of those job postings likely required some set of formal certifications.

Table: Job postings for occupational group at specified education level

Occupational Group	Education Level	Job Openings
Computer and mathematical	Bachelor's degree	23,648
Office and administrative support	High school diploma or equiv.	11,691
Management	Bachelor's degree	11,596
Business and financial operations	Bachelor's degree	9,202
Architecture and engineering	Bachelor's degree	8,844
Healthcare practitioners and technical	No minimum education req.	7,207
Sales and related	High school diploma or equiv.	6,684
Healthcare practitioners and technical	Bachelor's degree	6,283
Healthcare practitioners and technical	High school diploma or equiv.	5,819
Transportation and material moving	High school diploma or equiv.	5,531
Business and financial operations	No minimum education req.	5,143
Computer and mathematical occupations	No minimum education req.	4,662
Installation, maintenance, and repair	High school diploma or equiv.	4,581
Computer and mathematical occupations	High school diploma or equiv.	4,562
Community and social services	No minimum education req.	4,502

Note: Education requirements are distinct from certification, professional or experience requirements. These other requirements are not considered in this table.

In addition to formal educational credentials and professional certifications, Maryland businesses often cite a weakness in soft skills as an additional challenge in recruiting new hires that can succeed in their job. The table below lists skills associated with some of the most recruited occupations that may not be well measured by education of certification credentials.

Table: Occupational Skill Needs

Occupation	**Occupational Skill Needs**
Healthcare practitioners and technical	Customer service skills, interpersonal skills, problem solving, Registered Nurse (RN) skills, decision making, flexibility, critical thinking, time management, occupational therapist skills, and ability to educate patients
Management	Customer service skills, managerial skills, marketing skills, operations, manufacturing, technical skills, human relations, work effectively with people, conceptual skills, interpersonal skills, oral and written communication, constructive listening, honest and direct dialogue, sensitivity, flexible and adaptable, high energy level, ability to synthesize, work ethic, initiative, business judgment, self-confidence, leadership ability, decisiveness, and problem solving ability
Computer and mathematical	Repairing, quality control analysis, programming, troubleshooting, systems evaluation, installation, equipment selection, technology design, equipment maintenance, operation monitoring, systems analysis, operations analysis, judgment and decision making, operation and control, persuasion, instructing, service orientation, coordination, social perceptiveness, negotiation, management of material resources, management of financial resources, time management, management of personnel resources, complex problem solving, speaking, mathematics, science, writing, active learning, learning strategies, monitoring, active listening, reading comprehension, and critical thinking
Sales and related	Customer service skills, interpersonal skills, relationship management, business development skills, telemarketing skills, cold calling, time management, problem solving, ability to analyze, marketing skills, and closing skills
Office and administrative support	Customer service skills, problem solving, interpersonal skills, travel agent skills, time management, office clerk skills, word processing, typing, receptionist skills, answering phones, administrative assistant skills, and administrative management
Transportation and material moving	Customer service skills, problem solving, truck driving skills, unloading deliveries, web developer skills, application development, operate tractor-trailer, interpersonal skills, flexibility, unloading freight, and transportation management
Architecture and engineering	Customer service skills, apply mathematical and scientific principles to building design; concentrate on structural demands, functionality, and economic and safety factors; diagram designs manually and through computer-aided drafting; communication skills; ability to work with a team; and comfortable with different work environments

Occupation	Occupational Skill Needs
Food preparation and serving related	Customer service skills, food preparation worker skills, cooking skills, proper food handling, ability to speak clearly, following recipes, interpersonal skills, greeting customers, flexibility, restaurant manager skills, be a team player, positive attitude
Business and financial operations	Customer service skills, problem solving, business development skills, interpersonal skills, time management, ability to resolve issues, risk analyst skills, risk management, project manager skills, project manager experience, contract administrator skills, web developer skills, and application development
Installation, maintenance, and repair	Customer service skills, maintenance technician skills, preventative maintenance, general maintenance, building maintenance, construction worker skills, caulking, interpersonal skills, be a team player, time management, and welding skills

(B) Workforce Analysis. The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA4. This population must include individuals with disabilities among other groups in the State and across regions identified by the State. This includes—

(B) Workforce Analysis

(i) Employment and Unemployment. Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State.

Employment and Unemployment

Through 2018, Maryland continued the decade's trend of strong, steady improvement across all measures of employment and unemployment. The state's average employment level in 2018 was 3,071,652 with a peak employment of 3,115,752 in July. The number of unemployed individuals averaged 125,485 in Maryland for 2018.

Maryland's labor force participation rate averaged 66.9 percent in 2018. Labor force participation rate was 67.3 percent among people identifying as White/Caucasian, 66.8 percent for individuals identifying as Black, and 76.8 percent among Hispanics. Men participated in the labor force at a 73.3 percent rate, with those aged 35 to 44 averaging about 94 percent participation rate. Women averaged a 61.3 percent labor force participation rate, with ages 35 to 44 participating at an 82.0 percent rate.

Maryland's Central and Capital regions dominate the state's labor force and employment. They also have the lowest rates of unemployment. The Central region had the most residential employment in 2018, with 1,457,837 employed individuals living in the region. The Capital Region had the lowest unemployment rate in 2018 at 3.6 percent.

Table: Labor force statistics

Area	Labor Force	Employment	Unemployment	Unemployment Rate
Maryland	3,197,137	3,071,652	125,485	3.9%
Central region	1,518,749	1,457,837	60,912	4.0%
Capital region	1,190,243	1,147,512	42,731	3.6%
Eastern Shore	176,489	167,538	8,951	5.1%
Western Maryland	122,136	116,386	5,750	4.7%
Southern Maryland	189,520	182,380	7,140	3.8%

(ii) Labor Market Trends. Provide an analysis of key labor market trends, including across existing industries and occupations.

Since 2010, following the end of the Great Recession, private employment gained over 219,000 jobs. Fourteen of the 19 private industry sectors exhibited growth since then. The healthcare and social assistance industry added the most jobs (51,900). The management of companies and enterprises sector, with a 40 percent increase in employment, grew fastest. The table below gives more detail about the employment levels and growth across industries in Maryland.

Table: Private sector employment and growth, by industry

Industry	Employment (2018)	Employment Change (2010-18)	Growth (2010-18)
All private	*2,188,298*	*219,736*	*11.2%*
Agriculture, forestry, fishing and hunting	5,330	308	6.1%
Mining, quarrying, and oil and gas extraction	1,117	-360	-24.4%
Utilities	9,721	0	0.0%
Construction	163,210	20,462	14.3%
Manufacturing	109,683	-5,190	-4.5%
Wholesale trade	85,269	-195	-0.2%
Retail trade	283,912	6,806	2.5%
Transportation and warehousing	83,688	21,581	34.7%
Information	36,210	-7,619	-17.4%
Finance and insurance	91,793	-3,941	-4.1%
Real estate and rental and leasing	46,469	4,327	10.3%
Professional, scientific, and technical services	252,292	28,138	12.6%
Management of companies and enterprises	27,381	7,848	40.2%
Administrative and support and waste management and remediation services	173,080	30,173	21.1%
Educational services	69,417	9,350	15.6%
Health care and social assistance	375,911	51,900	16.0%
Arts, entertainment, and recreation	47,355	11,780	33.1%
Accommodation and food services	234,654	40,431	20.8%

Industry	Employment (2018)	Employment Change (2010-18)	Growth (2010-18)
Other services	91,803	4,002	4.6%

In 2018, the Central region led all Maryland sub-state regions in employment level (1,355,852 individuals), added the most private sector jobs since 2010 (133,758 jobs). While the Central region has exhibited the strongest employment growth since 2010, all regions have experienced growth in the number of employed individuals during that period. The table below gives more detail about employment growth since 2010.

Table: Regional private sector employment

Sub-state region	Employment (2010)	Employment (2018)	Employment Change (2010-18)	Growth (2010-18)
Central	1,222,094	1,355,852	133,758	10.9%
Capital	832,649	894,559	61,910	7.4%
Eastern Shore	131,687	140,219	8,532	6.5%
Western Maryland	104,463	106,575	2,112	2.0%
Southern Maryland	102,643	108,823	6,180	6.0%

Occupational Trends

Since the end of the recession in 2010, Maryland's occupational employment increased 7.2 percent. Personal care and service occupations grew 29.1 percent to lead all occupational clusters, followed by computer and mathematical occupations, which grew 23.5 percent. Mean annual wages for these occupational clusters have increased by 6.1 percent and 13.2 percent, respectively. Only two of the 23 major occupation groups have declined in employment while eight have grown more than ten percent.

(iii) Education and Skill Levels of the Workforce. Provide an analysis of the educational and skill levels of the workforce.

Education and Skill Levels of the Workforce

Maryland's skilled workforce possesses varied education levels. While members of Maryland's workforce are most likely to hold a bachelor's or advanced degree (27 percent), many have some college or an associate's degree (26 percent), high school or equivalent (23 percent). Twelve percent of Maryland's workforce has less than a high school diploma. The table below shows the trends and current levels of education attainment in Maryland.

Table: Education attainment of Maryland's workforce, past 20 years

Education Attainment	1998	2008	2018
Less than high school	201,320	234,891	308,165
High school or equivalent, no college	504,964	533,693	580,211
Some college or Associate degree	553,753	622,346	659,051
Bachelor's degree or advanced degree	594,618	676,689	670,744
Educational attainment not available	302,467	341,673	301,915

Maryland ranks in the top ten among states for most educated workforce in the U.S. In 2018, employment for workers with a bachelor's or advanced degree has increased by 4,926 jobs. Employment for workers with an educational attainment of some college or associates degree increased the most, with a gain of 7,898 jobs. Male workers were most likely to have primary and secondary education in 2018, while female workers were most likely to hold a postsecondary degree.

(iv) Skill Gaps. Describe apparent 'skill gaps'.

Skill Gaps

Available data cannot measure the gap between skills employers look for in recruiting, and the skills job applicants possess. However, there is evidence that the available labor supply lacks the knowledge and skills employers seek. Employer's requirements range from basic skills to more advanced, such as analytical thinking and complex problem solving. Businesses in Maryland have expressed concern about the lack of skills that are considered basic minimum for today's labor market.

Employers cite a lack of soft skills as a primary reason for being unable to fill vacancies, particularly in lower wage jobs. The top five skills employers request in Maryland are as follows:

- Customer service
- Problem solving
- Attention to detail
- Interpersonal skills
- Decision making

To explain long job recruitment periods, employers have noted job applicants falling short of the educational attainment requirements for the vacant positions. Educational institutions may be playing "catch-up" with employers to satisfy new job requirements to fill these skill gaps.

The proliferation of technology into a wider array of job functions has accelerated the rise of middle- and high-income jobs that require postsecondary education or training certification. This is one leading explanation for suppressed rates of labor force participation among prime-age workers, long-term unemployment, and elevated rates of labor underutilization not measured by the unemployment rate.

Populations with Barriers to Employment

Many individuals in Maryland face barriers that present unique challenges to gaining steady employment, and to the state system dedicated to helping them find it. This section describes demographic groups that may face additional barriers to gaining and maintaining employment. The table below gives further information about these groups, though data is limited in some key areas.

Table: Demographics of populations with barriers to employment

Population group	Count	Percent of population	Labor force participation rate	Unemployment rate
Total population	*6,042,718*	*100.0%*	--	--
Total working-age population	*4,931,235*	*81.6%*	*66.9%*	*3.9%*
Disabilities	676,072	11.4%	50.6%	12.5%
Low income	875,225	14.8%	--	--
Poverty	528,203	9.0%	50.9%	24.8%
Indigenous peoples	20,744	0.3%	65.6%	7.6%
Youths	379,728	6.3%	37.5%	17.3%
Youths with disabilities	55,753	4.2%	--	--
Homeless	31,318	--	--	--
English language barriers	396,606	7.0%	--	--
Single-parent households	402,939	18.2%	--	--
Long-term unemployed	38,500	0.8%	28.9%	100%
Older (55+)	1,742,994	28.8%	44.9%	3.2%
Veterans	409,000	8.8%	63.4%	3.2%

Note: Double dashes (--) indicate areas where data is not available. Labor force participation rate is measured as a percent of the group that is either employed or has recently looked for work. Count and percent of population includes all ages population or working age population, depending on the data source.

Disabilities

An estimated 676,072 individuals with disabilities live in Maryland. Just over half (50.6 percent) of these individuals participate in the labor force, a rate that is well above the US average of 42.5 percent. However, individuals with disabilities are three times as likely as someone in the state's general population to be unemployed.

Low income and poverty

There were approximately 875,225 individuals that are considered low-income in Maryland, defined as earning annual wages less than 150 percent of the federal poverty level. While unemployment data is not available for this group, those in poverty (annual earnings less than 100 percent of the federal poverty level) had an unemployment rate nearly six times higher than Maryland's general population.

Indigenous peoples

There are 13,433 American Indians and Alaska Natives in the State of Maryland and 60,221 residents that claim American Indian and Alaska Native heritage in combination with one or more other races. An additional 7,311 individuals identify as Native Hawaiian or other Pacific Islander, and 15,994 residents claim Native Hawaiian and other Pacific Islander heritage in combination with one or more other races. While this group participates in the labor force at a level on par with other Marylanders, they face unemployment at nearly double the rate.

Youths

Youth employment (ages 14-18) in 2018 reached 56,911 in Maryland, a slight decline of 57,121 from 2017. The Central Region employs most of Maryland's young workers at 29,431 followed by the Capital Region (17,065), Eastern Shore (4,148), Southern Maryland (3,3311), then Western Maryland (2,948).

Youths with disabilities

A total of 55,753 individuals, or 4.2 percent of Maryland's youth (age of 17 and under), are considered disabled.

Homeless

There were approximately 31,318 homeless Maryland residents including 1,397 children (under 18 years of age).

English language barriers

Of Maryland's residents, 396,606, or 7.0 percent, speak English less than "very well", which indicates limited English proficiency (LEP).

Single-parent households

In 2018, there were a total of 402,939 single-parent households in Maryland. There were approximately 101,726 male single-parent households and 301,213 female single parent households.

Long-term unemployed

There were approximately 38,500 long-term unemployed (unemployed 27+ weeks) in Maryland for 2018. Men accounted for 51 percent of the long-term unemployed and women accounted for 49 percent In terms of racial demographics, 42 percent of long-term unemployed were white, 55 percent were black, and eight percent were Hispanic.

Older workforce

The number of workers in Maryland who were 55 years and over, reached nearly 617,000 in 2018. Year over year, the workers 55 plus have increased, growing 3.3 percent in 2018. Central Maryland employs more older workers than any other area at 324,122 workers. Following Central Maryland is the Capital Region (207,608), Eastern Shore (36,682), Western Maryland (26,217), and then Southern Maryland (22,321).

Veterans

The unemployment rate for veterans in 2018 was 3.2 percent in Maryland, and at 63.4 percent labor force participation, they are nearly as likely to be part of the labor force as the general population.

(2) Workforce Development, Education and Training Activities Analysis.

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

(A) The State's Workforce Development Activities.

Provide an analysis of the state's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required and optional AJC delivery system partners.

Maryland has submitted a Combined State Plan that was careful to include the workforce functions of four state agencies: MD Labor; DHS, as the agency charged with administration of Maryland's Temporary Assistance for Needy Families (TANF) program; the Maryland State Department of Education's (MSDE's) Division of Rehabilitation Services (DORS), as the agency charged with administration of the state's Vocational Rehabilitation (VR) Program; and, the Department of Housing and Community Development (DHCD), as the agency charged with oversight of the Community Services Block Grant (CSBG) program.

MD Labor – Division of Workforce Development and Adult Learning

MD Labor's Division of Workforce Development and Adult Learning (DWDAL) is responsible for the administration of the majority of the programs set forth in this Combined Plan. The Division

administers the WIOA Title I, Title II, and Wagner-Peyser Programs. The Division also administers the Trade Adjustment Assistance Act program (Trade), the Jobs for Veterans State Grant (JVSG) Program, the Senior Community Service Employment Program (SCSEP), and Maryland Apprenticeship. SCSEP is also administered by non-state partners, including Senior Service America, Inc. and its subgrantees.[1]

The Division coordinates the efforts of Maryland's 30 American Job Centers (AJCs), which provide comprehensive services to both jobseekers and businesses. While jobseekers are offered a wide range of career and training services, businesses are provided with numerous types of assistance and growth services. The Division's Business Solution Team and Dislocation Services Unit work together to provide centralized oversight and administration of Maryland's Rapid Response and Trade Program activities. DWDAL coordinates many workforce training activities, including Reemployment Services and Eligibility Assessment (RESEA), Re-employment Opportunity Workshop (ROW), Rapid Response, etc. with the Division of Unemployment Insurance (DUI), another division within MD Labor. DWDAL also has a number of specialized offices focused on the diverse needs of Maryland's businesses and jobseekers.

Additional highlights from the Division's Office of Workforce Development (OWD) include:

- The Professional Outplacement Assistance Center (POAC) provides support to individuals who are in the professional, executive, technical, managerial, and/or scientific occupations, along with recent college graduates, who find themselves in need of assistance to get reconnected to the labor market.
- The RESEA program was developed by USDOL in an effort to reduce the number of weeks that UI claimants receive benefits. It is designed to proactively help claimants to identify potential barriers to employment, assess work search progress, and expose individuals to the vast array of services available through the workforce system.
- The ROW program is a full-day workshop offered to certain UI claimants to shorten the duration of UI benefits received through reemployment efforts.
- The Veteran Services Unit operates the JVSG. The JVSG program's mission is two-fold: it offers employment and training services to veterans with significant barriers to employment and connects employers with work-ready veterans.
- The Foreign Labor Certification (FLC) program is an employment-based immigration program that assists applicable employers who have obtained USDOL approval to begin the hiring process of permanent or temporary foreign workers.
- The Tax Credit Unit is charged with administering federal and state tax credit programs which offer income tax incentives to employers for hiring members of targeted population groups, such as registered apprentices, ex-offenders, or certain individuals with disabilities.
- The Migrant and Seasonal Farmworkers (MSFW) program provides a specialized menu of services within the Wagner-Peyser program and exists to ensure MSFWs are receiving the

[1] Senior Service America, Inc. is the Maryland national SCSEP grantee with subgrantees Jewish Council for the Aging of Greater Washington; MAC, Inc.; Baltimore County Department of Aging; and Prince George's County Department of Family Services, Aging Services Division. MD Labor is the Maryland State SCSEP grantee, which serves the Allegany, Baltimore City, Calvert, Caroline, Charles, Garrett, Kent, Queen Anne's, St. Mary's, Talbot, and Washington counties. Senior Service America, Inc. operates in the remaining 13 counties. In Baltimore City, both Senior Service America, Inc. and the MD Labor administer the SCSEP program concurrently.

same employment services that non-migrant seasonal farm workers receive at the state's AJCs.

- The Youth and Disability Services Unit provides disability and youth services coordination and technical assistance to the state of Maryland's Local Areas and partners responsible for serving WIOA Title I youth program participants and AJC customers with disabilities. These services include the implementation of MD Labor's Disability Employment Initiative grant, which exists to increase career pathway opportunities for individuals with disabilities.
- The Business Services Unit exists to help companies grow and thrive, to foster economic growth and stability, and to ensure that Marylanders have opportunities for gainful employment.
- MD Labor serves as the "State Apprenticeship Agency" and, in consultation with the Maryland Apprenticeship and Training Council, is responsible for the following functions in the State: registering apprenticeship programs that meet federal and state standards; issuing certificates of completion to apprentices; encouraging the development of new programs through outreach and technical assistance; protecting the safety and welfare of apprentices; and assuring that all programs provide high-quality training.
- The New Americans Initiative provides much needed outreach and technical assistance for AJC staff to ensure equitable and meaningful access of services to work-authorized New Americans and individuals with LEP.
- Employment Advancement Right Now (EARN) Maryland is the State's nationally-recognized, sector-based workforce program. The program is industry-led, designed to address business workforce needs by focusing on industry sector strategies that produce long-term solutions to sustained skills gaps and personnel shortages.

The Division is also home to the Office of Adult Education and Literacy Services. As the WIOA Title II provider in the state, the Office selects local providers of adult education instructional services via a statewide competition made available to eligible providers every five years. Instructional services include Adult Basic and Secondary Education, English Language Acquisition / Integrated English Literacy and Civics, Family Literacy, and High School Diploma preparation. Maryland's current providers include a wide-range of community colleges, local public school systems, community-based organizations, public libraries, and the State's Correctional Education program.

The Office of Correctional Education, also housed within the Division, provides educational opportunities for incarcerated men and women enabling them to become independent and productive workers, citizens, and parents. The Office, with the oversight of the Correctional Education Council and in partnership with the Department of Public Safety and Correctional Services (DPSCS), is responsible for the academic and vocational educational programs provided in Maryland's correctional institutions.

MSDE – Division of Rehabilitation Services (DORS)

The public VR Program in Maryland is administered by the MSDE's DORS in accordance with the Rehabilitation Act of 1973, as amended, most recently by the WIOA of 2014. DORS is funded primarily by the United States Department of Education's Rehabilitation Services Administration.

The federal funding includes a state matching requirement (federal 78.7 percent and state match of 21.3 percent) and maintenance of effort requirement. DORS provides services and supports to assist eligible students, youth, and adults with significant disabilities transition to postsecondary education, training, and employment. DORS also engages with businesses throughout Maryland, assisting them in recruiting and maintaining qualified, valuable employees. DORS also serves as a resource on disability and employment matters such as disability awareness training, workforce diversity and inclusion initiatives, training on the Americans with Disabilities Act, solutions for reasonable accommodations, and worksite consultations.

DHS - Family Investment Administration (FIA)

In Maryland, the TANF program is referred to as the Temporary Cash Assistance (TCA) Program, and is delivered by the Local Departments of Social Services (LDSS) level. LDSS Offices are the statewide framework for delivering education, job training, job placement, and other services to assist TANF customers with overcoming barriers to obtaining self-sustaining employment. Key components of the program include:

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

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

MD Labor -Division of Unemployment Insurance (DUI)

Maryland's Unemployment Insurance (UI) program is administered by MD Labor's DUI. The program pays benefits to Maryland workers who have lost their job through no fault of their own and meet the program's eligibility requirements. Individuals wishing to file a claim may do so

online or via DUI's Claim Center phone line. Maryland's AJC staffs are also trained to assist customers in filing claims. To help customers to benefit from the wide range of job seeker services available to them through the AJCs and WIOA partners, AJC staffs provide presentations to ROW and RESEA participants.

State and Local Workforce Development Boards (Local Boards)

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

The Maryland Workforce Association (MWA) is a coalition of executive directors from Maryland's 12 local workforce agencies. MWA works closely with GWDB and MD Labor to support a comprehensive workforce system. MWA, GWDB, and MD Labor meet monthly to discuss important matters pertaining to the workforce system and to provide perspective on issues that may arise. The collaboration between MWA, GWDB, and MD Labor creates a strong workforce system in Maryland. Local Boards are established in each of these 12 Local Areas to ensure that each area's workforce is well-prepared to meet the current and future needs of local businesses.

Community Service Block Grant (CSBG)

The Community Service Block Grant (CSBG) is overseen by DHCD, Division of Neighborhood Revitalization and their local grantees in the state's Community Action Agencies (CAAs). The program's primary objective is to develop viable communities, principally for persons of low- to moderate-incomes, by providing decent housing and suitable living environments, and through the expansion of economic opportunities. The Maryland workforce system welcomed DHCD as a partner in 2018 in the State Plan as well as in the WIOA Alignment Group, irrespective of whether they spend funds on employment and training. The Maryland workforce system, with DHCD and the CAAs, serves similar customers with barriers to employment.

SCSEP

Maryland's SCSEP services, offered by the MD Labor DWDAL and Senior Services America, Inc., are designed to assist older workers to develop workplace skills which will enable them to attain permanent, unsubsidized employment, either with their host agencies or other nonprofits, government or private sector employers. Participants are trained by a variety of employers including schools, physicians, health care agencies, hospitals, custodial and maintenance service industries, senior service providers, administrative and management entities, retail merchants, and transportation, security and technology companies. SCSEP services are available to job seekers, ages 55 and older, who are unemployed, meet established low-income guidelines, and desire an opportunity for training and employment. Program participants are given a training assignment that most closely matches their personal goals for employment. Training assignments are

coordinated with nonprofit or government agencies, also known as host agencies, and are limited to 40 hours per pay period, at the established minimum wage hourly rate. Applicants are not required to have previous work experience.

Reentry Employment Opportunities (REO) Programs

The Reentry Employment Opportunities (REO) program provides funding authorized as Research and Evaluation under Section 169, of WIOA for justice-involved youth, young adults, and formerly incarcerated adults. The REO grants are available to organizations with IRS 501(c)(3) non-profit status, including women's and minority organizations; state or local governments; or any Indian and Native American entity eligible for grants under Section 166 of WIOA to develop or expand programs to improve employment opportunities for adults ages 18-24 who have been incarcerated in the youth or adult criminal justice system, and adults ages 25 or older, released from prison or jail within two years of enrollment. Maryland currently has five REO grantees, all operating in Baltimore, City. Goodwill Industries International, Inc.; Living Classrooms Foundation; and Volunteers of America Chesapeake, Inc. are serving adults. Family Health International and Structured Employment Economic Development Corporation are serving young adults.

(B) The Strengths and Weaknesses of Workforce Development Activities.

Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.

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

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

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

workforce system; and to commit to strive forward in collective work, to improve the lives of Marylanders.

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

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

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

The Benchmarks are a strength of the Maryland workforce system and for the system's workforce development activities.

(C) State Workforce Development Capacity.

Provide an analysis of the capacity of state entities to provide the workforce development activities identified in (A), above.

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

Table: Partners for WIOA State Plan

WIOA State Plan Program	Core WIOA Program as determined by law	Additional WIOA Program as determined by Governor	MD State Agency Responsible for Oversight
Adult Program	•		MD Labor
Dislocated Workforce Program	•		MD Labor
Youth Program	•		MD Labor
Wagner-Peyser Act Program	•		MD Labor
Adult Education and Family Literacy Act Program	•		MD Labor
VRProgram	•		MSDE
TANF Program		•	DHS
Trade Adjustment Assistance for Workers Program		•	MD Labor
JVSG Program		•	MD Labor
UI		•	MD Labor
SCSEP		•	MD Labor and Senior Service America, Inc.
REO		•	Local partners
CSBG		•	DHCD

In 2020, the local grantees for the REO program are: Family Health International; Goodwill Industries International, Inc.; Living Classrooms Foundation; Volunteers of America Chesapeake, Inc.; and Structured Employment Economic Development Corporation.

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

(b) State Strategic Vision and Goals.

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—

(1) Vision.

Describe the State's strategic vision for its workforce development system.

Changing Maryland for the Better

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

(1) Economic Development and Jobs;
(2) Reduce Taxes and Fees;
(3) Fiscal Responsibility;
(4) Government Reform; and
(5) Improving Quality of Life.

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

Economic Development and Jobs

"We pledged to put more people to work…and we have done exactly what we said we would do…More businesses are open and more people are working than ever before in the history of our state…" -Governor Hogan's 2019 State of the State Address

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

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

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

The GWDB, comprised of business leaders in targeted industry sectors, has convened a number of task force groups around industry needs. Board members generally serve as ambassadors for Maryland's business community and further advise Governor Hogan and the workforce system on

workforce development and training needs for Maryland's businesses. However, the GWDB is only one entity in the system. All of Maryland's workforce partners must proactively engage with businesses to ensure that workforce training funds are utilized in the most effective and efficient way possible.

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

Maryland has also been recognized as a national leader in industry-led partnerships through the EARN Maryland program. The program, whose acronym stands for Employment Advancement Right Now, is a state-funded initiative that provides training opportunities for Maryland's jobseekers and those individuals seeking to obtain additional training to further their careers in a wide variety of fields. Partnerships have been formed to advance careers in health care, construction, biotechnology, cybersecurity and information technology, transportation and logistics, and many more. While there is wide variety in the partnerships funded through an MD Labor competitive grant process, all partnerships are driven by industry needs and have a number of business partners involved in shaping each individual program. To date, over 1,000 employer partners are participating in the EARN Maryland program. Harnessing the effectiveness of the program for the State's employer partners, Governor Hogan has more than doubled the EARN Maryland appropriation since taking office in 2015.

While these programs continue to make a marked difference for participating businesses, Maryland's WIOA Partners must continue to proactively work as a team to meet workforce challenges conveyed by the business. As noted above, no one agency or partner can provide all the services customers need. The same holds true for services to business. Maryland's WIOA Partners must work together to ensure quality customer service to the business. Previously, Maryland's business outreach was uncoordinated as agencies independently built relationships without collaboration. Thus, Maryland's workforce and economic agencies must coordinate efforts to provide consulting services in order to service business needs.

Since the formation of the 2016 State Plan, Maryland has continued to examine how it can find ways to collaborate to serve its common business customers. WIOA Partners continue to work on strategic plans, tools, and training to ensure greater communication and knowledge of each partner's programs. In coming years, the State intends to take more of a regional approach to business outreach to include coordination amongst State and local business services staff, RA Navigators, and Regional Local Veteran Employment Representatives. Business Services training will be conducted on a coordinated basis and Local Areas will be tasked with developing standard operating procedures on how local business service teams comprised of local partners will address business services. These procedures will be developed and ultimately included in local plans.

In short, these tools and approaches are targeted to develop a deeper understanding of the services each WIOA Partner offers so that business may be referred to the appropriate agency. Through relationship building, the State's workforce system must be attuned to the needs of Maryland's businesses, and must tailor workforce training opportunities to ensure that those needs are being met.

Improving Quality of Life

"Marylanders are among the nation's hardest working and most educated people." -Governor Hogan's 2015 State of the State Address

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

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

In the end, the primary goal of the workforce system must be to customize services to effectively help jobseekers, rather than shaping services to jobseekers to generate desirable performance results. This is not to say that performance measures are not important. However, it is the contention of Maryland's workforce system partners that focusing on the needs of fellow Marylanders, and will naturally drive positive performance metrics across programs. This shift in the system's focus will not only directly change the lives of the jobseekers served, but will also generate a powerful ripple effect, positively impacting the lives of that individual's family and wider community, truly be changing Maryland for the better.

As the workforce system dedicates its efforts to ensuring that all of Maryland's jobseekers are provided quality services, particular emphasis must be placed on those individuals who face barriers to employment that hinder them from entering into a fulfilling and meaningful career. Individuals with barriers to employment, as defined by the WIOA and Maryland include the following:

- Displaced homemakers
- Eligible migrant and seasonal farm workers
- Ex-offenders
- Homeless individuals
- Individuals facing substantial cultural barriers
- Individuals with disabilities, including youth with disabilities
- Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act

- Individuals who are English language learners
- Individuals who are unemployed, including the long-term unemployed
- Individuals who have low levels of literacy
- Individuals without a high school diploma
- Low income individuals, including TANF and SNAP recipients
- Native Americans, Alaskan Natives, and Native Hawaiians
- Older individuals
- Single parents (including single pregnant women and non-custodial parents)
- Veterans
- Youth who are in, or have aged out of, the foster care system

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

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

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

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

The State continues to make strides in collaboratively changing the workforce system to be more responsive to the needs of its customers. The State, utilizing the Governor's Title I set aside funds, initiated a competitive demonstration grant for Local Areas to create career pathways initiatives tailored to their Local Area's needs. As of late 2019, Maryland has invest $1.5 million to strengthen the relationship between WIOA Title I providers and adult education (Title II) entities.

The *Benchmarks for Success* will serve as critical mechanism for Maryland's workforce system to refocus on the needs of the customer. The *Benchmark*'s bold vision compels Maryland's WIOA Partners to systematically develop relationships that have not yet been created. The Benchmarks call for the system to track measures on mental and physical health and substance abuse, which have historically been tracked outside of the workforce system. They will further track how the system provides services to non-custodial parents and will lead the State to identify opportunities for grown and improvement.

Opportunities for Youth

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

MD Labor, MSDE, and the Commerce Department partnered to pilot a program in 2015 to establish a youth apprenticeship in science, technology, engineering, mathematics or manufacturing in two Maryland counties, Frederick and Washington. The pilot program was part of a larger initiative to foster youth apprenticeships in the State for both traditional and non-traditional apprenticeable fields. Providing opportunities for Maryland's youth that contextualize classroom training into the workplace must remain a priority for the workforce system in its delivery of services to youth in-school and out-of-school, alike. Following the pilot's success, 15 of Maryland's 24 public schools systems are now part of the Apprenticeship Maryland Program (AMP).

DORS provides Pre-Employment Transitioning Services (Pre-ETS) for students with disabilities. A student with a disability is an individual who is between the ages of 14 and less than 22, who is in Secondary, Post-Secondary, or a recognized educational program and has a disability. DORS partners with the Local Area, Local School Systems (LSS) and Community Rehabilitation Providers to deliver the five Pre-ETS. Those services are: job exploration counseling, counseling on opportunities for enrollment in in a comprehensive transition or post-secondary educational program, training is self-advocacy, work readiness, and work-based learning experience.

Additionally, due to the new WIOA focus on older, out-of-school youth, as well as including TANF as a mandated partner, Maryland views this as a prime opportunity to engage younger TANF recipients between the ages of 16-24 in local WIOA youth services. This earlier engagement in workforce development for young TANF recipients can place individuals on a career pathway that will lead to self-sufficiency and earlier independence from public assistance.

To that end, Maryland's WIOA Partners must examine innovations for youth and families. Governor Hogan, through executive order in 2017, established the Two-Generation Family Economic Security Commission. Since the creation of the State Plan, Maryland is investing in a Two- Generation (2Gen) framework to simultaneously provide services to youth and their parents. Leveraging relationships with Ascend at the Aspen Institute, the State is looking at this intergenerational model as a means to end systemic poverty.

The Commission developed a report of their findings and recommendations. This includes a recommendation to create a Two Generation Program Officer position within DHS to focus on the 2Gen mission and approach on behalf of the State. The new position, which was filled in 2019, serves as the liaison between state agencies, executive staff, the legislature, and federal partners. DHS has a number of active 2Gen programs to meet the needs of whole families.

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

Opportunities for Adult Learners

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

Additionally, English language learners represent approximately 56 percent of the adult education population. Immigrant populations make up approximately 17 percent of Maryland's workforce system. They provide substantial contributions to Maryland's economy every day. In turn, Maryland's workforce system must strive to tailor services for this population as they obtain literacy and high school equivalency, training, and employment services. In 2016 Maryland's WIOA partners collaboratively established the Skilled Immigrant Task Force to provide WIOA Partners and immigrant serving communities with a shared forum. The Task Force has generated recommendations for more holistically serving Maryland's skilled immigrant population.

Opportunities for Ex-Offenders

Efforts must continue to provide services for individuals in Maryland's correctional facilities. While Maryland's workforce system currently provides both academic and occupational training

for this subset of the adult learner population, efforts within the correctional education system must not simply be "out of sight, out of mind."

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

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

Maryland is taking a more collaborative approach to meeting the needs of ex-offenders under the WIOA system. One successful partnership that has already been formed has been between the Department's Office of Correctional Education and an EARN grant recipient, Vehicles for Change, an organization that provides opportunities for the reentry population. Individuals who successfully complete an auto mechanics program administered through the Department while "behind the fence" are not only provided an opportunity to obtain Automotive Service Excellence certification, but may continue their training upon release at Vehicles for Change. Additional training sets the returning citizen on the path towards employment. Recognizing that transportation is often a significant barrier to employment, the organization also provides individuals with the independence associated with owning their own vehicle.

Over the past year, MD Labor has hired five Reentry Navigators to support ex-offenders in job search and transitional activities. In partnership with the Maryland DPSCS, the Navigators are able to visit prisoners "behind the fence" and connect with pre-release inmates. This effort better connects this population to the AJCs and prospective employers.

Through a grant from the USDOL Women's Bureau, MD Labor (in close partnership with DPSCS) is piloting a Hospitality Pre-Apprenticeship program at the Maryland Correctional Institution for Women in Jessup, Maryland. The Hospitality Pre-Apprenticeship program will cover ServSafe Food Handler Certification and ServSafe Food Manager Certification, along with additional training aligned with employer needs, as identified by the American Hotel and Lodging Association employer network. Three cohorts of ten to 15 women will ultimately receive training through the pilot.

Labor, in collaboration with the DPSCS, successfully piloted the use of electronic tablets in academic courses at several Maryland correctional facilities. The tablets are provided by American Prison Data Systems (APDS) and allow inmates secure monitored access to digital education, rehabilitation, and job training/placement resources in a secure network environment. It is Labor's intention to continue the tablet program with DPSCS, through an expansion in 2020.

Additional programming for ex-offenders, administered through the State's AJC system, includes: participation in a federal program that provides bonding and tax credits for employers who hire ex-offenders; the utilization of staff specifically trained in ex-offender employment; and the establishment of workshops aimed at opportunities for record expungement.

Opportunities for Veterans

Veterans make meaningful and lasting impacts on their places of employment, their communities, and their families. Maryland's workforce system must be seen as a partner for veterans, ready with resources and expert guidance to assist them in transitioning from active duty service to civilian life, no matter when that transition occurred. Veteran staff are available at every AJC to exclusively serve the needs of veteran jobseekers with significant barriers to employment, as well as the businesses that seek to employ them. Maryland's workforce system is committed to providing high quality services to Veterans. Employment staffs at both the State and local levels are fully invested in supporting the success of this important population. Staff participate in ongoing professional development, and maintain updated knowledge on businesses seeking Maryland's veterans to fill open positions.

Opportunities for Individuals with Disabilities

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

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

The State is participating in the USDOL Disability Employment Initiative grant. Two Local Areas (Anne Arundel and Montgomery Counties) are deploying target resources to connect individuals with disabilities to training opportunities that lead to self-sustaining employment.

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

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

Reduce Taxes and Fees

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

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

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

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

Maryland has included UI as a WIOA Partner. As the State's focuses more on reemployment, this connection will benefit both jobseekers and businesses.

Fiscal Responsibility

Maryland's workforce system must be effective and efficient. If the focus is truly on the people and businesses that are served through the system, Maryland's workforce partners will naturally seek to create, coordinate, and revise systems to ensure greater delivery of services. Maryland's WIOA Partners must continuously coordinate efforts, finding efficiencies not only within their own agencies, but also finding ways in which they can coordinate efforts with their sister agencies.

One way this may be accomplished is though the sharing of data and technological resources. The Maryland Department of Human Services (DHS) is developing a shared data platform called

MDThink that will be utilized by WIOA Core Partners in the future in order to more efficiently serve common customers.

Government Reform

"Our administration will chart a new course; one guided by simple, common sense principles."
- Governor Hogan's 2015 State of the State Address

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

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

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

When the focus is on meeting the customer's needs, the workforce system's efforts will be on meeting the needs of the individual, not on meeting the goals written on a page. Maryland's workforce system will recognize that jobseekers are not an input into a system that must be moved through prescribed processes. Rather, the jobseekers who enter Maryland's AJCs, or visit LDSS locations are neighbors, friends, and fellow Marylanders who are in need of the critical services these agencies, and their local partners, deliver. This change is what Maryland's jobseekers and businesses not only deserve, but require.

This shift in focus also requires a change in the way that Maryland measures its performance. As Maryland has treated the enactment of WIOA as a way to critically analyze and ultimately "reset" the workforce system, the enactment of the federal act is also an opportunity to "reset" the performance standards that were negotiated under the Workforce Investment Act. In doing so, Maryland is reforming the operations of the workforce system.

Further, Maryland's efforts to increase and foster the growth of RA opportunities must be aligned with the workforce system. Previous efforts in apprenticeship focused heavily on the traditional

trades-based models. However, in order to truly promote apprenticeships, greater opportunity must be given to expand this "earn and learn" model to other traditionally non-apprenticeable fields.

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

Combating the Opioid Crisis

"I was the first governor in America to declare a state of emergency, and we committed $800 million toward fighting the heroin, opioid, and substance abuse epidemic from all directions with a multi-pronged approach focused on prevention, education, treatment, interdiction, and enforcement." -Governor Hogan's 2019 State of the State Address

Over the last decade, heroin and opioid drug dependency has surged in Maryland. In response to the severity of the opioid crisis, including prescription opioids, heroin, fentanyl, etc., ravaging communities in Maryland, Governor Hogan signed an Executive Order to continue the heightened response framework and encourage ongoing cooperation and mobilization of State and local partners. Under his guidance, and with support from USDOL, Labor has launched multiple strategic initiatives in partnership with key stakeholders to mitigate the impacts of the opioid crisis on Marylanders.

(2) Goals.

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

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

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

Maryland identified the following strategies as key to support the workforce system:

Table: Key Strategies for Achieving State WIOA Goals

Desired Outcomes	**Strategies for Accomplishing the Goals & Outcomes**
Leverage existing resources and minimize costs	● Integrating technology and data sharing between WIOA partners ● Enhancing functionality of the MWE ● Streamlining service delivery between WIOA Partners ● Using a "systems approach," where partner strengths are relied on and maximized ● Reducing staff costs as a result of improved customer flow and access
Increase access to education, training, and key services for individuals with barriers to employment	● Integrating career pathway models in competitive grant applications ● Expanding collaborative efforts to provide robust supportive services to customers ● Strengthening input of customers (jobseekers and business) through implementation of continuous improvement plans for service delivery that involve customer satisfaction surveys, focus groups, etc. ● Providing technical assistance and best practice resources ● Expanding apprenticeship opportunities in high-demand industries ● Ensuring the State has a robust Eligible Training Provider List (ETPL)
Improve customer intake processes via standardization to reduce the amount of time it takes for a customer to engage in services	● Creating metrics, process maps, and models ● Implementing universal design practices ● Implementing enhanced technologies that increase data sharing and access ● Readily identifying and proactively engaging unemployed individuals in intensive reemployment strategies soon after job loss ● Enhancing the capacity of the system to better serve individuals that are LEP
Increase focus on businesses and jobseekers as customers of the system	● Enhancing business engagement through the development of comprehensive business services teams and strategies which align businesses, trade associations, trade unions, chambers of commerce, community colleges, and other community-based organizations with resources dedicated to business outreach ● Creating regional business service units ● Aligning of apprenticeship opportunities with workforce development ● Expanding industry-driven models, like EARN

Desired Outcomes	Strategies for Accomplishing the Goals & Outcomes
Develop standards, policies, and procedures to ensure the sustainability of these best practice efforts throughout the State	● Establish consistent and regular communication between WIOA Partners at leadership and service delivery levels ● Increase collaboration between State agencies to determine best practices for service delivery ● Reliance on subject matter experts throughout the WIOA system when developing policies and procedures ● Soliciting input from WIOA system experts when creating State legislative agendas ● Providing technical assistance and financial incentives to establish and sustain initiatives that are in line with this State Plan

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

(3) Performance Goals.

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

See Appendix.

(4) Assessment.

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

Assessments, Performance, and Alignment

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

Benchmarks of Success

The *Benchmarks of Success for Maryland's workforce system* is a framework used by Maryland workforce development system partners to build system effectiveness, support transparency about progress, and help State and local WIOA partners align resources and strategies with its intentions.

The Maryland workforce system works together to implement the *Benchmarks of Success*. The Benchmarks reflect a shared vision of excellence among the State's workforce system partners and provide a strategic tool for continuous improvement. As Maryland seeks to strengthen and enhance its workforce system through implementation of WIOA, success requires a commitment to innovation, collaboration, and readiness to take a true systems approach.

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

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

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

Committee	**Mission**	**Goals**
Executive Steering Committee	The mission of the Executive Steering Committee is to provide strategic leadership for the rollout and implementation of Maryland's *Benchmarks of Success* initiative.	• Articulate vision and mission statements for the *Benchmarks of Success* initiative. • Evaluate and approve the committee goals and timeline developed by the WIOA Alignment Committee. • Champion the adoption of the Benchmarks across agencies.
WIOA Alignment Group	The mission of the WIOA Alignment Group is to ensure that implementation of the Maryland WIOA State Plan and to facilitate system-wide adoption and implementation of the goals and benchmarks.	• Evaluate committee goals and makes recommendations to the Executive Steering Committee. • Develop a detailed timeline that coordinates committee activities and identifies due dates for outputs. • Facilitate communication between the committees. • Identify goals for operationalizing the *Benchmarks of Success* and evaluate the effectiveness of efforts across the project and make adjustments as needed. • Build an efficient workforce system through staff training and information sharing, increase collaboration, streamline service delivery using a "systems approach" where necessary partner

Committee	Mission	Goals
		strengths are maximized, and improve customer flow and access. • Maximize technology to ensure a collaborative system through: the integration of technology and data sharing between WIOA Partners; enhancing functionality of the MWE; the creation of metrics, process maps, and models; work towards full accessibility of websites and web presences for those with disabilities; and implement enhanced technologies that increase data sharing and access. • Ensure a system that serves all and is accessible to individuals through the development of clear guidelines outlining the process for managing and referring customers between and among partners; ensure provision of culturally appropriate materials and services; implement universal design practices; create multiple access points to increase outreach; and to ensure that all jobseekers can access services.
Data and Dashboard	The mission of the Data and Dashboard Committee is to develop a consistent, sustainable system all workforce partners can use to measure, analyze display and apply Benchmarks data to continuously improve the quality and effectiveness of services.	• Produce a glossary of terms. • Develop metrics to assess baselines for benchmarks. • Develop a timeline for activities. • Measure system progress in meeting benchmarks over time. • Develop processes and tools for reporting performance. • Provide ongoing technical assistance for data analysis-related issues. • Explore potential platforms for data sharing across partner agencies, such as the MD Think. • Maintain communication with the WIOA Alignment Workgroup.
Professional Development and Technical Assistance	To produce, disseminate, and facilitate professional development and technical assistance programming that supports Maryland's WIOA partners in what the Benchmarks are and how they can be used to drive	• Analyze training needs and audiences. • Develop training on the *Benchmarks of Success* for Local Area workforce system managers and frontline staff. • Develop training on the *Benchmarks of Success* for Local Boards. • Create technical assistance events and tools to help Local Areas use the benchmarks effectively.

Committee	Mission	Goals
	continuous improvement.	• Produce a timeline for rollout of training products that is coordinated with other elements of the *Benchmarks of Success* initiative. • Maintain communication with the WIOA Alignment Workgroup.
Policy	The mission of the Policy Committee is to identify opportunities to support the implementation of the Benchmarks via policy change.	• Identify alignment opportunities for the *Benchmarks of Success* across programs and funding streams. • Identify policy needs related to *Benchmarks of Success* implementation. • Research best practices to identify innovations. • Identify opportunities to integrate / formalize *Benchmarks of Success*. • Maintain communication with the WIOA Alignment Workgroup.
Communications	The mission of the Communications Committee is to educate stakeholders internal and external to the State's workforce development system on the *Benchmarks for Success* initiative, and facilitate system-wide adoption and implementation of the goals and benchmarks through clear communication.	• Develop a strategic communications plan to support the successful rollout and effective implementation of the *Benchmarks* initiative that includes: o The identification of internal stakeholders in the State's workforce development system as well as external stakeholders who use and benefit from system services; o Clear value statements for the *Benchmarks* that are relevant for each of the targeted stakeholder groups; o Individualized communication strategies that are designed to be effective in reaching specific target audiences; o An implementation timeline coordinated with the activities of the other committees that identifies milestones and due dates. • Provide guidance and oversight for the implementation of the communications plan. • Develop branding and messaging deliverables. • Maintain communication with the WIOA Alignment Workgroup.

Jobseeker Voice

Maryland's customer–centric approach requires that the WIOA partners continue to meet the needs of jobseekers and businesses who utilize the services of the WIOA system. As GWDB continues to ensure that businesses are proactively engaged and that the voice of business is represented, the WIOA partners are also dedicated to including jobseekers in decision making. This effort will engage jobseekers throughout the state in an effort to better understand the barriers they face in

securing employment. Local Areas are required to speak to how they will ensure that jobseekers have a role or voice in the board's decision making processes and in informing the services that the Local Area provides (e.g. forming a jobseeker advisory group). As Maryland's system continues to dedicate its efforts to those with barriers to employment, this effort will ensure that the WIOA partners are continually aware of the barriers faced by jobseekers and workers in securing and maintaining stable employment, and earning a family–supporting wage. Engagement of jobseekers will allow the WIOA partners to further develop an understanding of how processes could be streamlined from a customer's point of view. Jobseekers could also help improve the reemployment efforts, Rapid Response, and other programs provided at the AJCs throughout the state by providing first–hand information on how these programs can help jobseekers overcome the barriers they face in order to become re– employed quickly.

Maryland State WIOA Convenings

The WIOA partners recognize that continuous communication is necessary to ensure that Maryland's customer–centric workforce model is not just words on a page. Maryland's WIOA partners have convened on three different occasions thus far to bring together local, state, and federal subject matter experts to break down silos and plan a path forward for the State of Maryland, concerning the implementation of WIOA. Each Convening brought together 150-250 State and local leaders from the workforce system.

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

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

The third convening, in the winter of 2018, unpacked WIOA Section 188 and subsequent guidance, overviewing topics such as the Nondiscrimination Plan and the Language Access Plan, compliance deadlines, *Benchmarks*, WIOA target populations and priority of service, and cultural competency. In-depth topics included language access training, Equal Opportunity Officer training, accessibility for individuals with disabilities, the discrimination complaint process, understanding work eligibility documents, and more.

Maryland is dedicated to ensuring that communication regarding the state's implementation efforts is not a singular event. Beginning in 2016, the WIOA partners leveraged mass communication systems, such as GovDelivery/Granicus, to ensure that important messages regarding implementation are continually provided in a unified manner to frontline staff, local providers, and other stakeholders. Furthermore, Maryland is dedicated to utilizing WIOA implementation

funding to ensure that local and state staff are provided professional development and other training opportunities.

(c) State Strategy.

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

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

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

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

Employment Advancement Right Now (EARN) Maryland

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

Since the program began in 2014, EARN has been recognized as a national best practice for its innovation and implementation of sector strategies. In 2015 and 2016, the National Skills Coalition and Urban Institute praised EARN as a leader in industry-led workforce initiatives. In 2017, EARN was highlighted at the National Conference for State Legislatures as a model to be emulated. In 2018, EARN was named one of the Top 25 programs in Harvard's 2018 Innovations in American Government Award competition, which highlights exemplary models of government innovation.

EARN focuses on three distinct subsets of the workforce: unemployed, underemployed, and incumbent workers. Regardless of industry and region of the State, employers identify a similar challenge around recruiting candidates with the appropriate skill sets for employment. As of October 2019, over 7,400 incumbent workers have participated in training, earning a new skill, certification or credential.

As a result of their participation in EARN, employers have a steady pipeline of candidates with relevant skills to consider for hire, thus decreasing screening, interviewing, and training costs and reducing worker turnover.

Recognizing the success of the program, Governor Hogan has more than doubled the appropriation for EARN since 2015. Specifically, $3 million annually has been earmarked in Fiscal Years (FY) 2018, 2019, and 2020 to promote training in Cyber and Information Technology. Additionally, $1 million annually for FY 2018, 2019, and 2020 was allocated for green jobs training. While this funding will sunset in 2020, EARN will receive funding through the Clean Energy Jobs Act (CEJA) beginning in FY 2021. Passed during the 2019 Legislative Session, the CEJA will provide $8 million to the Department of Labor to support clean energy job development utilizing Pre-Apprenticeships and RAs. Finally, in FY 2020, $500,000 was earmarked to benefit employers and residents in and around the State's 149 Opportunity Zones. These key investments by Governor Hogan will allow a larger number of employers to benefit from this industry-driven program, and ensure a more highly-skilled workforce.

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

Registered Apprenticeship (RA)

Maryland continues to focus its efforts on RA expansion. The State's goal is to fully align RAs with the Maryland workforce system to provide Maryland's businesses with a sustainable employment pipeline in both traditional and non-traditional industry sectors. To effectively expand RA, Maryland remains focused on expanding capacity by: (1) increasing staffing and infrastructure; (2) strategically conducting outreach and education with stakeholders, including the business community and the WIOA Partners; and (3) advancing innovative practices.

To strengthen the infrastructure, in October 2016, the Maryland Apprenticeship and Training Program was transferred to the DWDAL with the enactment of 2016 Chapter 343 - Planned Apprenticeship Standards and OJT Activities - Revisions. Also in 2016, the United States Department of Labor awarded MD Labor $2.2 million to accelerate and expand RA opportunities within the State. As a result, Maryland is seeing tremendous overall growth both in skilled trades-based RAs as well as non-traditional areas, such as health care and information technology.

Using USDOL grant funding, MD Labor established its "Apprenticeship Innovation Fund" to invest in programs that support and enhance RA expansion strategies, particularly for vulnerable populations, youth, and dislocated workers. Through this fund, the Department has dedicated over $1.1M since 2017 (initial funding of approximately $612,000 and continuation funding of

approximately $518,000) to award competitive grants to applications, so that they may implement new and promising ideas or adapt proven strategies, at the systems or service delivery level, to expand the reach of RA programs in Maryland. Maryland will remain focused on supporting its business community and jobseekers with this proven earn-and-learn model.

Following the success of its initial USDOL award, MD Labor received a new *RA State Expansion Grant* in 2019 totaling $2,854,797.39. With this new funding, Maryland will continue to grow the capacity of RA by implementing six strategies:

A. **Related Instruction Reimbursement Program**: Grant program available to RA sponsors or participating/signatory employers with a RA sponsor to cover the actual cost of Related Instruction, up to $3,000 per new Registered Apprentice in their first year of a RA.

B. **Apprenticeship Innovation Fund (AIF) 2.0**: Competitive grant program that awards up to $250,000 to up to seven separate entities to develop and scale larger RA programs.

C. **Infusion of Additional Leveraged Staffing Resources**: Cross-training and collaboration between MD Labor's Apprenticeship and Training Program and Business Solutions Unit to increase the State's capacity to conduct outreach, develop RA programs, design curriculum, and to provide more in depth business services. MD Labor will leverage existing funding streams and staff to implement this strategy.

D. **Apprenticeship Roundtables**: Quarterly discussion sessions, targeting a variety of industry sectors and geographic areas, in order to stimulate future RA growth opportunities.

E. **Youth Apprenticeship and School-to-Apprenticeship on-Ramps to RA**: Building upon the existing AMP, the State's Youth Apprenticeship initiative to help employers become their own RA program Sponsors (or alternatively, become a participating employer with a Group Joint or Group Non Joint sponsor) and dually register youth apprentices as RAs. MD Labor will work with RA sponsors to expand the School-to-Apprenticeship model based on pilot success.

F. **Prison-to-Apprenticeship on-Ramp to RA**: Creating pathways and connecting correctional education occupational programming to RA sponsors, providing incarcerated individuals with a minimum of one year of Related Instruction approved by a RA program Sponsor. The Related Instruction will incorporate work in prison, on work release or through intensive labs as available. The inmates will be registered as apprentices prior to release in order to help facilitate a more seamless connection to new employment.

Career Pathway Investments

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

Between 2017 and 2019, MD Labor committed $1.5M of Maryland's WIOA Set Aside funding to supporting Local Areas and adult education providers in implementing career pathway demonstration projects that increase training and employment opportunities for Marylanders who do not yet possess high school diplomas or those who are not yet proficient in English. Through this initiative, the Department has funded three rounds of demonstration projects that pilot interventions involving proven strategies, such as pre-apprenticeship training, English Language Acquisition, distance learning, bridge programming, pathways to employment for out-of-school youth, and more.

Literacy, numeracy, and English language requirements often make it challenging for adult learners to access occupational training opportunities. Historically, educational prerequisites have prevented adult learners from enrolling in job preparation courses due to requirements related to minimum levels of academic proficiency. The career pathways developed through this funding will create integrated education and training opportunities that ensure accelerated access to industry credentials and work opportunities for adult learners

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

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

In order for the Plan to succeed, leadership from the WIOA Partners must ensure that the programs they administer adapt and effectively integrate to ensure seamless delivery of services for the workforce system's collective customers. This requires a greater level of communication between the WIOA Partners, as well as a communication throughout the system. The constituent programs within Maryland's workforce system must be aligned to provide businesses and jobseekers with the best possible service.

Maryland's WIOA Alignment Group

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

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

- At least one representative of the GWDB;

- At least one representative from the Maryland MD Labor's DWDAL;
- At least one representative from the Maryland MD Labor's DUI;
- At least one representative from the Maryland DHS' FIA;
- At least one representative from the MSDE's DORS;
- At least two Local Board representatives;
- At least one local representative from the DORS;
- At least one local representative of a WIOA Title II adult education service provider;
- At least one representative from a LDSS; and
- At least one representative from the DHCD.

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

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

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

Communications

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

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

- Support transparency about progress in implementing the WIOA State Plan;
- Leverage technology to communicate en masse about important initiatives, policies and other updates via the WIOA distribution list (Anyone can sign up here: https://public.govdelivery.com/accounts/MDDLLR/subscriber/new?qsp=MDDLLR_3);
- Offer cross-agency technical assistance and professional development events; including in-person statewide WIOA Convenings;
- Educate stakeholders internal and external to the State's workforce system on the *Benchmarks of Success initiative* that includes:
    - The identification of internal stakeholders in the State's workforce development system as well as the external stakeholders who use and benefit from system services;

    - Clear value statements that are relevant for each of the targeted stakeholder groups;
    - Individualized communication strategies that are designed to be effective in reaching specific target audiences;
- Leverage social media to conduct effective outreach and to reinforce messages;
- Promoting WIOA Partner initiatives, events and services, as appropriate;
- Embrace the "AJC" common identifier and invest in branding efforts to ensure that consistent messaging exists across the State and to increase Marylanders' familiarity with the services available through the WIOA network;
- Develop and refine outreach materials targeted at jobseekers and businesses; and
- Identify and implement strategies that will enhance and continuously improve communications internal and external to the WIOA Partners.

Maryland WIOA Workgroups

To support the successful implementation and adoption of the *Benchmarks of Success* initiative, Maryland utilizes the following Work Groups (in addition to the Executive Steering Committee and the WIOA Alignment Group):

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

Jobseeker Voice

Maryland's customer–centric approach requires that the WIOA partners continue to meet the needs of jobseekers and businesses who utilize the services of the WIOA system. As GWDB continues to ensure that businesses are proactively engaged and that the voice of business is represented, the WIOA partners are also dedicated to including jobseekers in decision making. This effort will engage jobseekers throughout the state in an effort to better understand the barriers they face in securing employment. Local Areas are required to speak to how they will ensure that jobseekers have a role or voice in the board's decision making processes and in informing the services that the Local Area provides (e.g. forming a jobseeker advisory group). As Maryland's system continues to dedicate its efforts to those with barriers to employment, this effort will ensure that the WIOA partners are continually aware of the barriers faced by jobseekers and workers in securing and maintaining stable employment, and earning a family–supporting wage. Engagement of jobseekers will allow the WIOA partners to further develop an understanding of how processes could be streamlined from a customer's point of view. Jobseekers could also help improve the reemployment efforts, Rapid Response, and other programs provided at the AJCs throughout the

state by providing first–hand information on how these programs can help jobseekers overcome the barriers they face in order to become re– employed quickly.

III. OPERATIONAL PLANNING ELEMENTS

(a) State Strategy Implementation.

The Unified or Combined State Plan must include–

(1) State Board Functions.

Describe how the State Board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

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

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

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

The vision includes:

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

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

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

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

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

The GWDB has established cross-cutting strategic initiatives as an outgrowth of task forces, formulated in previous years. Engagement and support from stakeholders and leaders throughout the business, workforce, education, labor, and nonprofit industries representing Maryland is essential to these initiatives. The strategic initiatives include:

- Cybersecurity and Information Technology (IT), the needs of which cut across industry sectors;
- Advanced Manufacturing and related skilled occupations;
- Healthcare and Life Sciences related endeavors;
- Education related endeavors, such as mentoring and youth development;
- Diversity and Inclusion initiatives, particularly to assist those with barriers to employment, including Returning Citizens, Immigrants, Individuals with Disabilities, Economically Disadvantaged, Women and Girls in Science, Technology, Engineering, Mathematics (STEM) fields, etc.;
- Outreach, helping maximize the reach of partners and stakeholders, and extending this outreach to the future workforce by engaging students, educators, and parents; and
- Interagency Development, helping expose staff and board members to holistic, wraparound services, and to interagency work across multiple State agency partners.

The Cybersecurity and Information Technology strategic initiative includes leaders and experts from businesses, universities, and nonprofits to ensure education and instruction align with employer needs within the Cybersecurity and IT industry. The initiative continuously works to create a pipeline of talent for employers by focusing efforts on engaging students as well as incumbent workers as necessary catalysts to fill these openings.

The Manufacturing and Skilled Trades strategic initiative includes industry leaders and school representatives to ensure that Maryland students are aware of opportunities in the manufacturing and Career and Technical Education (CTE) fields across the state. Maryland currently has

thousands of open jobs in manufacturing and construction. The initiative seeks to establish a pipeline that will connect Maryland students to gainful employment within these industries.

The Healthcare and Life Sciences strategic initiative includes industry leaders and experts and seeks to establish a viable pipeline of talent to hospitals, nursing homes, and medical companies. The initiative works with hospitals and professionals in the medical field to determine future needs, and educational professionals are included in order to ensure applicable course work and instruction.

The Education strategic initiative largely incorporates work-based learning through CTE, mentoring, coaching, apprenticeship, and other training models, including virtual methods. Educational partners have included: Junior Achievement, the Governor's P-20 Leadership Council, and the Maryland Business Roundtable for Education.

The Diversity and Inclusion strategic initiative includes experts across multiple industries within Maryland and seeks to ensure that underrepresented populations are consistently involved in the alignment of education and workforce. The initiative actively seeks to connect those with barriers to employment, including disadvantaged workers, immigrants, individuals with disabilities, older individuals, returning citizens, veterans, and young adults, to new industries and gainful employment.

The Outreach strategic initiative is designed to champion the work of the GWDB and other programs throughout Maryland industries. The initiative works to produce opportunities to connect new employers and potential employees. By utilizing strategies including newsletters, social media, panels, and other marketing initiatives to expand outreach to businesses, employers, and the future workforce, the GWDB recognizes that an essential component of the incredible services and opportunities being provided in Maryland is ensuring that the public and businesses are aware of the multitude of initiatives available. As such, the GWDB is committed to developing promotional strategies resulting in greater awareness, understanding, and utilization of the statewide workforce development system in Maryland.

The GWDB continues to ensure that all strategic initiatives outlined above are focused on ensuring opportunities are provided for all Marylanders to succeed in the 21st century workforce.

(2) Implementation of State Strategy

(A) Core Program Activities to Implement the State's Strategy.

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

To support Maryland's comprehensive and collaborative workforce system, the Maryland WIOA Partners are committed to ensuring effective coordination and alignment of the State's WIOA programs through strategic policy development, coordinated resource sharing, and collaboration

with local and regional partners. Together, Maryland's WIOA Partners will facilitate the creation of a strong, skilled workforce that effectively connects with businesses to help them compete in the global, State, and local economies. Consistent with Governor Hogan's vision, the WIOA Partners will continue to ensure that customers are provided with the services they need, in a way that avoids duplication of programs and activities carried out through the system.

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

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

(B) Alignment with Activities outside the Plan.

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

Collaboration is the hallmark of Maryland's WIOA implementation. Through continuous engagement with a range of state, local, and nonprofit organizations serving shared customers, Maryland's workforce system partners have developed deeper relationships that have allowed them to serve targeted populations with more integrated, effective, and innovative service offerings. The positive results of these efforts have enabled Maryland to:

- Expand RAs;
- Strengthen strategic industry partnerships through the EARN Maryland (EARN) program;
- Leverage the skills of the State's immigrant population;
- Extend the reach of the workforce system into communities through the public library system; and
- Address the negative impacts of the State's opioid crisis; and implement a two-generational approach to service delivery.

RAs

The Hogan Administration is committed to supporting RAs as the State's premiere workforce solution. Maryland's goal is to align apprenticeships with the workforce system, to ensure that traditional RA opportunities expand alongside the creation of new opportunities grounded in labor market demand. During the 2016 Legislative Session of the Maryland General Assembly, the Department sponsored Senate Bill 92, a measure that transferred the State's apprenticeship programming to the DWDAL. This legislative enactment, approved unanimously by the Assembly and signed into law by Governor Hogan, provided key resources for the growth and expansion of apprenticeships. The states of Pennsylvania and Delaware have subsequently adopted similar legislation based on Maryland's model.

In 2016, the USDOL awarded MD Labor $2.2 million to accelerate the development of and expand availability to RA opportunities in the State. Through the ApprenticeshipUSA Acceleration Grant and the ApprenticeshipUSA Expansion Grant, MD Labor was able to invest in the State's RA programming, leveraging funds to grow and diversify RAs. Based on the MD Labor's successful utilization of those grants, USDOL provided Maryland with an additional ApprenticeshipUSA expansion grant in the amount of $1,816,649 in 2018. In 2019, USDOL awarded Maryland another $2,854,797.39 to directly serve new Registered Apprentices, develop new RA programs, and expand the number of existing RA Sponsors.

This series of USDOL grants has enabled Maryland to significantly expand RAs as a workforce development solution. Since the 2012, the number of Registered Apprentices has grown by approximately 40 percent. As of November 2019, Maryland had 10,711 registered apprentices earning and learning - the highest participation rate in state history. Since the Maryland Apprenticeship and Training Program was integrated into Maryland's workforce system in October 2016, a total of 60 new RA programs have been created, and 24 programs have been reactivated since November 2016, more than double the number of reactivations in the prior four years combined.

The end goal for the expansion grants is to provide Maryland's business community with a sustainable employment pipeline in both traditional and non-traditional industry sectors focusing on three critical elements:

1. **Expanding Capacity by Increasing Staffing and Infrastructure**
    - To grow pre-apprenticeship and RA opportunities, key infrastructure investments were needed in the Maryland Apprenticeship and Training Program. Maryland utilized the grant funding to expand the apprenticeship unit from four to eleven staff. The program team now includes the Program Director, three Program Managers, and six Apprenticeship Navigators.
    - Maryland leveraged additional funding to hire a Maryland Apprenticeship Youth Navigator in 2017 and a second Youth Navigator in early 2018.
    - A part-time contractual staffer was brought onboard through the SCSEP to help with the organization and modernization of the Maryland Apprenticeship and Training Program. This proved so successful that the employee transitioned to a full-time contractual position in 2019.

- The Maryland Apprenticeship and Training Program team served a new record of 10,711 RAs in 2019, marking the second consecutive year that the Program exceeded 10,000 registered apprentices. The Maryland Apprenticeship and Training Program served over 110 active occupations, 162 active registered sponsors and 3,781 employers who participate in RA during this time and conducted over 200 Compliance Reviews of RA Sponsors.
- Maryland WIOA partners established the Maryland Apprenticeship Think Tank in January of 2018. The Think Tank is a network of professional organizations committed to expanding apprenticeship opportunities to individuals with disabilities. Through a diverse array of initiatives – research, education, public engagement, and on-the-ground innovation and practice – the Think Tank shares information on emerging trends and opportunities, best practices in apprenticeship and highlight how apprenticeship can break into new industry sectors and serve a more diverse population of VR individuals. Think Tank members consist of a variety of leaders from DORS, including leadership from DORS' Workforce Training Center, along with MD Labor, Maryland Department of Disabilities, the Community College of Baltimore County, and community program providers such as, the ARC, who are collaborating to secure lasting change in the area of Youth, Pre-Apprenticeship and RA at the State and local level.

2. Outreach/Education

- A variety of public engagement strategies are being utilized to increase awareness of apprenticeship as an essential tool for workforce development, recruitment, and training the next generation of skilled workers. Outreach and education are critical components to building partnerships that develop the RA program as the solution to Maryland's 21st century workforce needs. To this end, the Department convened a diverse array of stakeholders (school system representatives, business leaders, students, parents, and others) in sessions to discuss the many current and future benefits of RA for employers and employees alike. Likewise, MD Labor has looked to increase collaboration between the Maryland Apprenticeship Training Program, Local Boards, and other workforce agencies to identify strategies for connecting jobseekers to RA programs.
- Maryland hosted a portion of the inaugural Transatlantic Apprenticeship Exchange Forum held in Washington, D.C. and Baltimore, with representatives from the United Kingdom's apprenticeship program.
- MD Labor conducts extensive outreach on an ongoing basis to chambers of commerce, industry associations, such as the Maryland Tech Council (MTC), the GWDB, and Local Boards. Robust industry engagement facilitates the development of multi-employer programs and program templates. Maryland's EARN program, a signature workforce initiative built on strategic industry partnerships, has continued to thrive under this approach: through EARN, over 500 industry sector partnerships are being nurtured.

3. Advancing Innovative Practices

- Building on established partnerships with industry and workforce intermediaries, Local Workforce Development Areas (Local Areas), training providers, and

institutions of postsecondary education, MD Labor established an *"Apprenticeship Innovation Fund"* to invest in programs that support and enhance RA expansion strategies, particularly for vulnerable populations, youth, and dislocated workers. MD Labor dedicated $621,000 in early 2017 to award competitive grants to applicants to implement new and promising ideas, or adapt proven strategies at the systems or service delivery level to expand the reach of RA programs in Maryland. The competitive grant structure has proven effective through Maryland's implementation of its Maryland Business Works incumbent worker training fund. In April 2017, the State announced the first four recipients of funding from the Apprenticeship Innovation Fund.[2] Since April 2017, over $1.2 million to support 36 awards to expand RA in Maryland.

Maryland received an additional award to institute a pilot program aimed at mitigating the hiring challenges found within the healthcare industry by drawing on an untapped resource, internationally trained skilled immigrants. The Maryland Apprenticeship and Training Council approved the Baltimore Alliance for Careers in Healthcare (BACH) to sponsor a pilot that employed a competency-based model. The pilot initiative included Baltimore area hospitals such as Johns Hopkins Hospital, to serve as RA Sponsors for competency-based RAs in the health care related occupation of Environmental Care Supervisor. The first employer for this occupation, Johns Hopkins Hospital, successfully hired their first eight apprentices in 2017. Expansion of this program continued into 2018 with the addition of occupations in the healthcare industry, such as surgical technologist and Licensed Practical Nurse (LPN). BACH has been awarded additional funding to continue the progress made as part of the initial round of grant funds.

Since being awarded additional funding from the ApprenticeshipUSA State Expansion Grant from MD Labor, BACH continues to partner with employers and educational institutions to provide competency-based, middle skill healthcare apprenticeship opportunities. In addition to Johns Hopkins Hospital, the program has expanded its reach by building programs with LifeBridge Health's Levindale Hospital and University of Maryland Medical Center. Currently, BACH sponsors four Registered Apprenticeships: Environmental Care Supervisor, Licensed Practical Nurse, Surgical Technologist, and Central Sterile Processing Technician. To date, BACH has registered 48 apprentices and has a 90 percent successful completion rate. Upon completion, Registered Apprentices are guaranteed full time employment in what they trained in and, to date, receive an average full-time wage of $20.78 per hour; over 25 percent more than their starting wage. BACH continues to target underemployed immigrants seeking an opportunity in the healthcare field. Through intake appointments, interview preparation, job readiness classes, and job search assistance the apprenticeship program has served over 100 new Americans. The program continues to expand as it designs a new medical assistant Registered Apprenticeship opportunity, in collaboration with several healthcare employer partners.

[2] The press release outlining the projects can be accessed at: http://www.dllr.maryland.gov/whatsnews/apprinnovation.shtml

The State has leveraged events during National Apprenticeship Week to increase involvement from Local Areas and the WIOA partners. Maryland's Office of Apprenticeship and Training has provided training opportunities for Local Areas and WIOA partner staff to become more familiar with RA opportunities. Maryland is continuing to make a concerted effort to add RA sponsors to the Eligible Training Provider List (ETPL). Since 2017, the State has seen the list grow from 0 sponsors participating to over 178 by the end of the calendar year. Also in 2017, Prince George's County engaged with its RA sponsors to hold the State's first RA Job Fair.

Skilled Immigrant Task Force

Maryland recognizes the detrimental effects of brain waste on the economy. "Brain waste" is the result of the underutilization of the skills and experience of foreign-trained immigrants. Because of the economic hardships of immigrants looking for employment opportunities that align with their professional backgrounds and training, Maryland submitted a Letter of Interest (LOI) to the White House National Skills and Credential Institute in 2016. The LOI identified four key barriers to the integration of skilled immigrants in Maryland's workforce, including:

- **LEP**
  Even though most foreign educated individuals possess technical skills needed to perform skilled jobs, they often lack the English proficiency necessary to communicate effectively in a workplace. A study by the Migration Policy Institute found that Maryland has 113,000 LEP individuals who have completed some form of college or higher.
- **Complex licensing and credentialing processes**
  Many professional careers in the United States are within regulated professions, many of which are regulated at the state level. In order to return to previous professions, immigrants have to undergo licensing processes that are particularly complex due to foreign credentials not often well understood or fully recognized. In addition, the licensing process is costly, timely, and confusing for many immigrants.
- **Limited experience of Maryland's workforce system in working with foreign-born individuals**
  The ability to assist foreign-born individuals navigate the complex workforce development system requires specialized accommodation and the provision of culturally appropriate services that is often lacking at the local level. Staff at the AJCs and other federal or state funded workforce projects require professional development to enhance services to skilled immigrants seeking to re-enter their profession.
- **Lack of social capital on the part of immigrants**
  Numerous studies assert the importance of social connections to find employment. For many newly arrived immigrants who have little to no social connections, finding a job can be difficult despite having all other qualifications.

The Maryland Skilled Immigrant Task Force was created in June 2016 to address these issues, based on the conviction that Maryland can lead the way in creating a win-win environment in which immigrants secure jobs that match their professional and educational backgrounds while

simultaneously meeting the hiring demands of the business community. The Task Force was co-sponsored by MD Labor, but many other organizations also contributed toward its creation, including Baltimore City Community College, the Baltimore Mayor's Office for Immigrant and Multicultural Affairs, City of Baltimore Mayor's Office of Employment Development, the Gilchrist Immigrant Resource Center in Montgomery County, International Rescue Committee, Lutheran Immigration and Refugee Service/Higher, Montgomery College, Upwardly Global, the Welcome Back Center of Suburban Maryland, and World Education Services (WES) Global Talent Bridge.

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

In 2017, the Task Force issued the first ever *Maryland Workforce System Survey: Serving Limited English Proficiency (LEP) Individuals and Skilled Immigrants*. The tool surveyed WIOA partners from MD Labor, Local Areas, DORS, and LDSS regarding how the workforce system engages immigrants and those with LEP. Of the 428 responses, 51 percent were from those in direct-service positions. Respondents indicated interest in learning how to enhance service to these populations through cross-training and professional development opportunities. The complete survey is available at http://www.dllr.state.md.us/employment/wdskilledimmigrantsurvey.pdf. The Task Force was also key in establishing Maryland's Third WIOA Convening in January 2018, which focused on training for Local Areas and state staff on the provisions of Section 188 of WIOA, the State's Nondiscrimination Plan, and DWDAL's proposed Language Access Plan.

Additionally, Maryland seeks to enhance services to and remove barriers for English language learners through several grant and technical assistance opportunities. First, Maryland was chosen as one of eight U.S. localities to receive customized technical assistance from WES Global Talent Bridge to advance its skilled immigrant integration efforts. Each of the eight pilot communities received 12 hours of coaching and advising provided by WES Global Talent Bridge; 12 hours of additional customized technical assistance from national experts; and four interactive web-based training sessions with WES Global Talent Bridge and other national partners on topics related to immigrant professional integration. Second, MD Labor participated in the National Occupational Licensing Learning Consortium, a peer-learning consortium focused on occupational licensing policies. This selective group worked on understanding ways to remove barriers to labor market entry and improve professional licensing portability and reciprocity. Member states identified areas within their individual policies that may impede entry for populations most burdened by those policies as well as potential solutions to reduce related barriers. These populations include skilled immigrants, people with criminal records, active duty military, veterans and their spouses,

and unemployed and dislocated workers. From participation in this consortium, several changes have been made that reduce language-related licensing barriers for the LEP population for the barber, cosmetology, plumbing, and HVAC professions. LEP individuals seeking a barber or cosmetology license are now able to utilize language interpreters for theory exams and those seeking a plumbing or HVAC license are now able to use a translation dictionary for exams.

Maryland's Response to the Opioid Crisis

Over the last decade, heroin and opioid drug dependency has surged in Maryland. In response to the severity of the opioid crisis, including prescription opioids, heroin, fentanyl, etc., ravaging communities in Maryland, Governor Hogan signed an Executive Order to continue the heightened response framework and encourage ongoing cooperation and mobilization of State and local partners. Under his guidance, and with support from USDOL, Labor has launched multiple strategic initiatives in partnership with key stakeholders to mitigate the impacts of the opioid crisis on Marylanders.

- National Health Emergency Grant - USDOL announced a new National Health Emergency (NHE) Dislocated Worker Demonstration Grant program in 2018 to help communities across the nation address the economic and workforce-related impacts of the opioid crisis. Maryland was one of six states selected for NHE awards, winning $1.9 million through the competitive grant process. To maximize the impact of this funding, Maryland's workforce system is partnering with the Opioid Operational Command Center (OOCC) and the Maryland Department of Health's Behavioral Health Administration (BHA) to implement solutions that effectively address the complex needs of individuals struggling with addiction issues. Maryland's multidimensional approach under the NHE grant encompasses two activities: funding for Title I providers and the creation of the Opioid Workforce Innovation Fund.

  Title I providers in certain Local Areas across the State were awarded grant funding to support employment and training services for job seekers living and/or working in communities impacted by the opioid crisis. Local Areas are using awarded funds to provide customers with employment, training, and supportive services that help them prepare for, secure and retain employment and advance along career pathways in high-demand industries and occupations.

  Local Areas are also using grant funds to connect customers interested in pursuing employment in careers related to addiction and SUD treatment, behavioral health, and pain management with related training and employment opportunities to build workforce capacity. A key focus of this project is on leveraging behavioral health system resources, such as Certified Peer Recovery Specialists (CPRS), to help jobseekers personally impacted by the opioid crisis to eliminate barriers to employment.

  MD Labor has directed the remaining NHE funding to a newly-created Opioid Workforce Innovation Fund (OWIF), a competitive grant fund designed to seed the implementation of new and promising ideas or to adapt proven strategies at the systems or service delivery level, to expand workforce capacity to meet industry demands. A wide range of entities

applied for funding to implement innovative, industry-driven workforce solutions serving populations directly or indirectly impacted by the opioid crisis. In addition to employment and training activities, OWIF funding may also be used for supportive services and to connect customers to employment and training resources who are interested in pursuing careers related to behavioral health, SUD treatment, and pain management. OWIF grants were awarded to 16 Maryland organizations in 2019. Given the success of the OWIF in serving individuals directly or indirectly impacted by the opioid crisis, MDH committed $200,000 in additional funding to extend the initiative's reach. This added investment will allow a total of three projects to receive funding and will result in an additional 30 individuals served.

- Women's Bureau - In 2018, Labor accepted funding from USDOL's Women's Bureau (WB) to combat the opioid crisis and its impact on women. MD Labor is utilizing this funding for two distinct projects: 1) a competitive Request for Proposals; and 2) a pre-apprenticeship hospitality pilot at one of Maryland's correctional institutions.

  The first project, *Workforce Solutions: Women and Opioids*, utilizes the State's procurement process to competitively select grant recipients that support local partnerships and innovation at the local level. Funding is being used to connect women to in-demand training and employment opportunities, including those who have a direct or indirect history of opioid use or those who are seeking to transition into a profession that supports people struggling with opioid addiction.

  The second project, a *Hospitality Pre-Apprenticeship Pilot,* is being conducted at the Maryland Correctional Institute for Women (MCIW), the only women's correctional institution in Maryland. DWDAL's Office of Correctional Education leads the pilot in close partnership with the DPSCS and the American Hotel and Lodging Association (AHLA). The Hospitality Pre-Apprenticeship program will cover ServSafe Food Handler Certification and ServSafe Food Manager Certification, along with additional training aligned with employer needs, as identified by the AHLA employer network. Three cohorts of 10 to 15 women will ultimately receive training through the pilot. Upon completion of training and release, trainees will work closely with Reentry Navigators, a Correctional Education Transition Coordinator, and other partners to connect to employment opportunities with AHLA members.

- Continued Partnership - As a result of the close partnership formed with the MDH and DPSCS, MD Labor led efforts on a grant proposal to the OOCC, which was awarded in August of 2019. The pilot project will develop a new offering through MD Labor's Correctional Education program to train Certified Peer Recovery Specialists (CPRS). This training will occur at MCIW and allow 20 incarcerated women to participate. Of those, a percentage will be close to release, and others will be fulfilling longer sentences.

  Women released soon after completing training will work with MD Labor's assigned Reentry Navigators, who interface with employers and will be able to connect successful trainees to employment in the behavioral and mental health fields upon release. For the students who will be incarcerated for a longer period, the CPRS certification will provide

a more meaningful purpose, allowing the skills learned through the training to help countless other women incarcerated at MCIW through their recovery journey.

The potential impact of this training is significant and far-reaching. For example, the women trained will earn their required 500 hours of supervised work or volunteer experience by providing direct peer support to fellow incarcerated women. Further, this certification is highly sought by employers in the mental and behavioral health fields and will greatly increase employability upon release. Additionally, the content delivered through the credential training process simultaneously supports each incarcerated citizen in further developing their personal recovery, increasing the likelihood for sustained recovery after release back into the community.

Two-Generation (2Gen)

Maryland is among a handful of states nationwide integrating a 2Gen approach into workforce system services to disrupt the cycle of intergenerational poverty. Current research indicates that 40 percent of Maryland adults who received TCA in FY 2016 and 2017 received Food Supplement Program (FSP) benefits as children. These statistics substantiate the unfortunate reality that programs intended to be short term interventions have, in some cases, ended up supporting multiple generations of families. The 2Gen approach creates an opportunity to realign programs and deliver services using a more holistic, family-centric model that produces positive outcomes.

To break the cycle of poverty among Maryland families, Governor Larry Hogan signed Executive Order 01.01.2017.03 to produce a *Final Report on the Two-Generation Family Economic Security Commission and Pilot Program,* an interagency, multidisciplinary commission to evaluate current programs and policies. Under the provisions of the Executive Order, the Commission was charged with investigating policy challenges, opportunities, and recommendations regarding the mitigation of multigenerational poverty as follows:

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

The Commission, chaired by Lieutenant Governor Boyd K. Rutherford, held eight public meetings, commencing on June 28, 2017. Input from those meetings was integrated into the *Final Report on the Two-Generation Family Economic Security Commission and Pilot Program* report, which was issued in December of 2018. In addition to providing relevant statistics and profiling best practices from pilot programs, the Report delivered Commission findings and recommendations. These included a recommendation to create a Two Generation Program Officer

position within DHS to focus on the 2Gen mission and approach on behalf of the State. The new position, which was filled in 2019, serves as the liaison between state agencies, executive staff, the legislature, and federal partners.

Active 2Gen programs currently overseen by DHS include the following:

Whole Family Approach - Following the report's recommendations, the State's TANF plan has adopted a 2Gen approach to serving families. The 2Gen approach intentionally works to build the whole family's well-being through coordinated programs and services both within the administrations of DHS and throughout the State of Maryland. The 2Gen approach to TANF helps families navigate state and local resources to achieve their goals; and promotes policies and services that reflect the lived experience and input of customers.

2Gen Innovation Grants - Maryland's 2Gen Innovation Grants provide funding for community-based organizations seeking to implement and test new approaches to coordinating services for families receiving TANF. The grant program will fund proposals for technical assistance, strategic planning, updates to data management, management of information systems, or other approaches that result in simultaneous interventions for both parents and children, reflect 2Gen best practices, and demonstrate a clear effort to remove silos in existing programs or strategies that serve different members of the family.

DHS Special Target Populations - Families with disabilities: DHS is committed to strengthening a diverse workforce and connecting TANF customers and their families with disabilities to the supports necessary so that they may fully participate in the state's economy. DHS will enhance staff knowledge and strategies on connecting customers with disabilities with career pathways best suited to a family's specific situation. In doing so, the agency will leverage resources and expertise of WIOA partners including but not limited to MSDE DORS.

Rehabilitation Services and MD Labor - Returning citizens: Approximately 10,000 individuals are released from prison each year in Maryland. Within three years, 40 percent are rearrested. The unemployment rate among those released exceeds 50 percent. While research shows that an employed ex-offender is less likely to commit crimes and return to prison, a criminal record is the greatest barrier to employment, creating a vicious cycle wherein affected individuals become dependent on criminal activity for living. To interrupt this cycle, the State is providing returning citizens with training opportunities, access to expungement services, and career pathways that are accessible to those with criminal records.

Non-Custodial Parents - DHS will maximize the impact the TANF Block Grant has on families by supporting non-custodial parents (NCP). NCPs eligible to participate include those with children who receive TANF, SNAP, SSI, Medicaid, and/or CHIP. Expanding the eligible population for workforce and training services with the goal of increasing earnings for NCP's will reduce caseloads and prevent TANF leavers from returning to assistance. Supporting NCPs also means that they will be more equipped to meet child-support obligations - decreasing the likelihood that their children will also become welfare recipients.

LEP –DHS is committed to TANF programming that is nimble and responsive to the changing needs of the States' diverse population. Maryland will use TANF to address the needs of families with LEP by creating programs that address barriers unit to the population such as low English language literacy, lack of U.S. work experience, unrecognized education and training credentials, limited professional networks, cultural differences and more.

Substance Abuse - DHS is clear on the impact of the current opioids crises. The Department has noted a shift in caseload demographics such as children residing with relatives as well as an increased need for supportive services such as mental health and/or substance abuse treatment. DHS will ensure any family impacted by substance abuse has the necessary services needed to successfully gain and maintain employment. Through supportive services, the Department will make the necessary referrals, not only to those experiencing a substance abuse disorder but also to those impacted by a family member experiencing addiction. In alignment with the States' 2Gen approach, families who are impacted by substance abuse will be screened so both somatic and mental health needs are addressed for all impacted members of a family.

Caretaker Relatives - Due to the current drug crisis, DHS has noted a trend of increased cases where grandparents and/or other relatives are caring for minors. These trends are most notable in areas with higher rates of opioid misuse. Presumably, parents are unable or unwilling to care for their children due to a variety of reasons that are directly related to drug abuse such as prolonged absences from home, incarceration, admission to treatment facilities, etc. DHS will intentionally screen caretaker relatives and identify opportunities for enhanced supports that address secondary trauma and an often complex system to navigate.

Youth - In harmony with the DHS's 2Gen approach, the agency is committed to providing youth with the resources and opportunities they need to make informed choices that will positively impact their education and career goals. Work-based learning is a proven practice that leads to better employment outcomes as adults. DHS will provide youth opportunities for contextualized learning to better enhance career opportunities as they enter the workforce.

Transitional Support Services - The Transitional Support Services (TSS) initiative began in July 2019. The purpose of the initiative is to help TANF leavers to smoothly transition to self-sufficiency. Through TSS, a TANF household is able to continue to receive cash assistance for a period of time after their TANF case closes due to income over-scale. DHS will continue to enhance the program to include additional support services (i.e. case management and post-job placement) assistance to ensure that TANF leavers are able to not only maintain employment, but also, they thrive. DHS is currently developing a process to automatically refer TSS recipients to the Supplemental Nutrition Assistance Program Employment and Training to access additional services that will lead to increased household income and improved overall economic wellbeing.

Extended the Allowable Time Period for Vocational Education and Education Program - Beginning July 1, 2020, the State will allow an applicant or a recipient to meet the work activity requirement for a maximum of 24 months by either:

- Engaging in a minimum of 20 hours per week of vocational education training that is directly related to employment and education that leads to an associate degree, a diploma or a certificate; or
- Engaging in an average of at least 20 hours per week of education directly related to employment, which may include an adult basic education program, an English as a second language program, or a high school diploma/GED program.

MD THINK - DHS is building a groundbreaking technology platform that will transform the State's ability to deliver vital human services to constituents. The first program of its kind in the nation, MD THINK will serve more than two million Marylanders through one cloud-based platform. It will integrate the state's health and human services applications, so workforce system partners can more effectively and efficiently deliver multiple services on a unified platform.

(C) Coordination, Alignment, and Provision of Services to Individuals.

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

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

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

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

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

Target Populations: Individuals with Barriers to Employment

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

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

Maryland's WIOA system will:

- Incorporate continuous staff training, which is paramount to understanding and properly utilizing the tools available to facilitate assessment, to disseminate information on services available throughout the system, and to refer customers to appropriate WIOA partner organizations.
- Provide multiple access points to increase outreach and balance efficiency among the various persons involved with the customer experience.
- Create a robust menu of services and appropriate referrals that can effectively meet the needs of a diverse customer base.
- Establish relationships, competence, and accountability among all partners involved in the system. Through the Alignment Group, the WIOA Partners will establish deeper relationships and accountability to enhance the customers' experiences.
- Encourage sharing of information among partners, such as creating a resource map, workforce network blog, WIOA listserv, and a common customer service management system. The Alignment Group will provide guidance to the system.
- Encourage greater business involvement in workforce processes, in Workforce Development Boards, and in the sharing of "industry-related" work skills and behavioral

expectations. This includes a greater collaborative role for community colleges and industry organizations in developing programs that meet labor market needs in the Local Area.
- Develop a common intake process that provides the ability to access customer information on services provided and next steps in the process.
- Reduce duplicative processes to expand staff's ability to serve customers more efficiently;
- Establish guidelines for WIOA Partners to manage and refer customers to other partners;
- Identify liaisons among the various partners to assure that customers experience a seamless flow and referral to appropriate services.
- Develop a mechanism for clear identification of resources and service responsibilities among the partners and within the community.
- Place customers at the center of policy decisions regarding service delivery.

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

Supportive Services

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

Maryland's WIOA Partners recognize that supportive service needs vary widely by participant and geography and, therefore, supportive services must be designed to assist in the removal of the specific barriers that individual participants face. The State will consider customer feedback to drive decision-making to ensure that supportive service funding is allocated in a way that truly meets customer needs.

Additionally, programs working with out-of-school youth ages 16-24 are strongly encouraged to work with Local Management Boards through the Governor's Office for Children to plan and implement supportive services that respond to the needs of youth in their respective jurisdictions. Local Management Boards are local government designees established in each of Maryland's 24 jurisdictions to ensure the coordinated implementation of a local inter-agency service delivery

system for children, youth, and families. Local Management Boards are able to apply for flexible State funds from the Children's Cabinet to support programming that aligns with Governor Hogan's goal of ensuring economic opportunity for all. These flexible State funds may provide necessary supports that could not otherwise be provided with existing, less flexible federal dollars. It is envisioned that collaborative planning and implementation will prevent service duplication and ensure that State funds are used to fill gaps in services. Local plans must address how they will leverage and coordinate supportive services in service delivery.

(D) Coordination, Alignment and Provision of Services to Employers.

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

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

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

GWDB

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

develop business-majority Board memberships. Local Areas must also outline in their local WIOA plans how they intend to provide a greater business voice in local workforce services.

Maryland's Business Services Team

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

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

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

To gain a deeper understanding of the services different partners have to contribute, the Business Services Team engages in frequent communication with all parties. The bank of shared knowledge and resources that this level of communication and coordination builds enables Business Services Team members to refer businesses to the partner organizations best positioned to provide assistance. Recognizing that a workforce system disconnected from business lacks credibility and fails to meet the needs of jobseekers, the WIOA Partners are dedicated to creating an industry-driven solution to workforce development. Business partners are centrally involved in identifying workforce needs, developing curriculum, designing trainings, and placing successful participants. The full engagement of business in the process builds employer confidence that program participants are proficient in relevant skill sets.

EARN Maryland

The EARN program, is a nationally recognized, State-funded competitive workforce development grant program that is industry-led, regional in focus, and a proven strategy for helping businesses

cultivate the skilled workforce they need to compete. It is flexible and innovative, designed to ensure that Maryland employers have the talent they need to compete and grow in an ever-changing 21st century economy.

The goals of EARN are to:

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

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

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

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

(E) Partner Engagement with Educational Institutions.

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

Maryland maintains strong collaborative partnerships between educational institutions and other WIOA State partners to create a job-driven education and training system. These connections support a cohesive, integrated workforce system that prepares workers with the in-demand skills that Maryland's employers need. To facilitate collaboration, Maryland houses adult education and literacy programs (WIOA Title II programs) within MD Labor's DWDAL, alongside other WIOA programming. Program colocation fosters regular communication and shared strategic planning, which helps to ensure that local adult education service providers and the WIOA Title I providers in Local Areas are positioned to effectively coordinate services and resources.

With strong partnerships as a foundation, Maryland has employed a range of engagement strategies:

Policy Development

MD Labor's DWDAL engages education partners in important policy initiatives:

- To reduce duplicative testing and streamline referrals between partner agencies, DWDAL worked with education stakeholders (including representatives from community colleges) to develop a policy on adult basic education (ABE) and English language assessments. This policy unifies requirements for Title I and Title II providers.
- DWDAL released a new policy on the State's Eligible Training Provider process in 2017 to ensure that Local Areas have sufficient numbers and a diverse pool of quality providers of in-demand training. The ETPL policy was developed to: help Maryland create an effective marketplace for the training programs available to WIOA participants with Individual Training Accounts (ITAs); reduce burden on training providers to submit accurate performance information and to guide WIOA participants, in conjunction with staff, in selecting training in the State and Local Areas; prohibit discrimination by training providers in accepting and enrolling WIOA program participants; and, provide information on eligible training programs to WIOA participants in a way that helps them make informed decisions, along with staff and within local policy, on how to use their ITAs.
- In 2018, DWDAL released a Privacy and Data Security policy to provide statewide guidance on the management of Personally Identifiable Information, an important issue when sharing participant information between partners.

Career Pathways

In Maryland's 2016 workforce plan, the State pledged to provide resources to establish a robust career pathways system that helps Maryland's adult learners in increase their earning capacity. To drive action at the local level, the State required Local workforce partners to address in their local plans how they intended to implement a career pathways model to address their local workforce training needs.

At the State level, MD Labor fulfilled its pledge with the release of the *Career Pathway Connections for Adult Learners* Competitive Grant Proposal in October 2017 to solicit demonstration projects. The goals of the Career Pathway Connections grant initiative were to: increase WIOA Title II adult learners' access to WIOA Title I training and career opportunities; focus on meeting lower-level adult learners where they are in education-level and support them in meeting career goals; increase adult learners' co-enrollment in WIOA Titles I and II; address the needs of businesses; expand career pathways by piloting one or more proven interventions; support the creation of a Maryland WIOA Co-Enrollment and Career Pathways Guide to facilitate the distribution of information related to best practices, successes, challenges, and more; and achieve sustainability once grant funds were exhausted or projects ended. To ensure pilots were set up for success, MD Labor required each participating Local Area to identify a target industry and include partner engagement. MD Labor will continue to provide technical assistance through the Maryland Through the initiative, MD Labor invested over $1 million of WIOA Governor's Set-Aside funds

into innovative career pathway demonstration projects. Awards were distributed in 2018 to five of Maryland's 12 Local Areas. In 2019, MD Labor awarded $0.5 million to two more sites, including one Local Area and one community college.

Youth Apprenticeships

Maryland has made great strides in building youth apprenticeship opportunities. Through the work of the Maryland Youth Apprenticeship Advisory Committee (the "Committee") and the continued push by MD Labor, the MSDE, the Maryland Department of Commerce (Commerce), and the local school systems across the State, more students, parents, and employers understand the benefits of apprenticeship opportunities for youth.

During 2018, groundwork was put in place to make youth apprenticeship available statewide by the conclusion of the initial two-year, two-county pilot program. The Youth Apprenticeship Advisory Board worked with MD Labor and MSDE to craft the educational framework necessary for local public school systems to design and implement their own youth apprenticeship initiatives. Local county school systems were invited to submit proposals to MSDE staff members to add the AMP as a career and technology education program of study for its students. As a Career and Technical Education (CTE) program, local systems can use Perkins Grant funds to support the program. Both departments are hopeful that this approach will help to facilitate the future entry of additional participating school systems.

Expansion of AMP during this period of historically low unemployment is the ideal time for the program to become a proven, sustainable workforce development strategy. In 2018, the groundwork was put in place to expand youth apprenticeship to be available statewide. Labor, Commerce, and MSDE's original goal for growing AMP during 2019 was to increase the program from the original two pilot counties to a total of six participating school systems. As a consequence of combined efforts, since the June 2018 unveiling by MSDE of the AMP CTE Program of Study, 15 out of Maryland's 24 local school systems have adopted the model.

As the program has expanded, MD Labor and its partners have taken steps to ensure adaptability by working with employers to identify a variety of training models for greater program flexibility. This includes providing related instruction through any of the following formats: through the local high school, through online programs offered either at the place of employment or at the high school, at the work site of a participating employer, through an industry association, through a Joint Apprenticeship and Training School, or through the community college. The learning component is designed to comport with the needs of the employer to include credentialing and certification. Maryland also focuses its recruitment of employers from one of MSDE's ten Career Cluster areas which are based on the high-demand sectors defined by Commerce. Labor, MSDE, and Commerce aligned the program with federal, state, and local resources to ensure that AMP addresses Maryland's workforce and economic development needs.

During the 2017 – 2018 academic year, a total of 30 new eligible employers were approved by the Maryland Apprenticeship and Training Council, raising the number of eligible employers from 14 to 44. This represents nearly 215 percent growth versus the first year of the pilot program. In the 2019-2020 academic year, additional employers have joined since the end of the pilot program,

bringing the number of employers as of the printing of this report to 155. More will be added moving forward.

MD Labor and MSDE are committed to growing the program to scale so that as many of Maryland's young people as possible can utilize this innovative career pathway program. Over the next several years, both departments aim to add several local public school systems per academic year. Moreover, MD Labor will continue to explore ways to use youth apprenticeship as a springboard to post-secondary education and/or job training and career development.

(F) Partner Engagement with Other Education and Training Providers.

Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

Training without the close involvement of industry and business will likely be to no avail. Maryland has embraced employer and industry driven models to training through the EARN Maryland program and through the State's investments in RAs.

EARN Maryland

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

Since the program began in 2014, EARN has been recognized as a national best practice for its innovation and implementation of sector strategies. In 2015 and 2016, the National Skills Coalition and Urban Institute praised EARN as a leader in industry-led workforce initiatives. In 2017, EARN was highlighted at the National Conference for State Legislatures as a model to be emulated. Additionally, at the request of the National Skills Coalition, EARN Maryland staff provided technical assistance to states seeking to emulate this national best practice. In 2018, EARN was named one of the Top 25 programs in Harvard's 2018 Innovations in American Government Award competition, which highlights exemplary models of government innovation. As of October 2019, over 7,400 incumbent workers have participated in training, earning a new skill, certification or credential. Employer partners identify many benefits to their employees participating in EARN training, including increased cost savings, productivity and retention.

Recognizing the success of the program, Governor Hogan has more than doubled the appropriation for EARN since taking office in 2015. Specifically, $3 million annually has been earmarked in FY 2018, 2019, and 2020 to promote training in Cyber and Information Technology. Additionally, $1

million annually in FY 2018, 2019, and 2020 was allocated for green jobs training. While this funding will sunset in 2020, EARN will receive funding through the Clean Energy Jobs Act (CEJA) beginning in FY 2021. Passed during the 2019 Legislative Session, the CEJA will provide $8 million to MD Labor to support clean energy job development utilizing Pre-Apprenticeships and RAs. Finally, in FY 2020, $500,000 was earmarked to benefit employers and residents in and around the State's 149 Opportunity Zones. These key investments by Governor Hogan will allow a larger number of employers to benefit from this industry-driven program, and ensure a more highly-skilled workforce.

Due to the critical role of employer and industry partners in the implementation of the program, EARN partnerships are encouraged to grow their employer network. As of October 2019, over 1,000 employers have participated in the program. In 2017, the Business Economic and Community Outreach Network (BEACON) performed a survey to ascertain the effectiveness of the program from the perspective of EARN employer and industry partners. When asked to rate the competitive advantage of EARN participants, nearly 75 percent of survey respondents stated that they have a significant competitive advantage over their peers, with 25 percent responding that EARN participants have at least some competitive advantage. Over 97 percent of respondents expressed that their participation in EARN is worth the investment. Finally, nearly 93 percent of employers expressed that their participation in EARN has had a positive impact on their business. To this specific question, respondents cited that the program has helped their business to increase efficiency and effectiveness in meeting the mission and goals of the organization, expand and increase the diversity of the talent pool from which they hire, and increase exposure in the community and to candidates. The results of this survey solidify the impact of the industry-led model in improving business outcomes and best serving Maryland's workforce.

In 2019, the Department continued its partnership with the Maryland DHS' Food Supplement Employment Training (FSET) Program. Funded by the United States Department of Agriculture, the program connects people who receive monthly food supplement benefits (SNAP, food stamps) to job-driven training programs. The program requires a cost-match with non-federal funding. Participating programs will be reimbursed up to 50 percent of allowable program costs, thus increasing the State's and other non-federal funders' investment and increasing the number of Marylanders to receive in-demand skills training. Because EARN is a state-funded program, EARN Maryland partnerships have the means to provide the cost match. Eleven EARN grantees have taken advantage of the program, including the Jane Addams Resource Corporation, Civic Works, Humanim, Job Opportunities Task Force, NPower, Per Scholas, and the Maryland Food Bank.

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

importantly, WIOA customers would be trained in in-demand occupations leading toward employment opportunities.

RAs

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

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

In January 2017, there were no RA sponsors on the State's ETPL. Due to the effort of the Office of Apprenticeship and Training, and as a result of intensive outreach, over 55 joined the ETPL to leverage WIOA funding.

(G) Leveraging Resources to Increase Educational Access.

Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

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

EARN Maryland (EARN)

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

Career Pathways

Maryland continues to build on previously implemented multi-year pilots of the Maryland Integrated Basic Education and Skills Training (MI-BEST) program and the Accelerating Connections to Employment (ACE) initiative to drive and strengthen career pathways. In October

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

MD Labor has developed a Career Pathways grant program to expand opportunities for adult learners throughout the state. Under the program, Maryland's WIOA Local Boards (Title I providers) and Adult Education organizations (Title II providers) could apply for up to $250,000 to develop innovative demonstration projects with a consortium of local partners, including adult education providers and business partners. To date, MD Labor has awarded a total of $1.5 million in grant funds in three funding rounds.

RAs

USDOL grant funds awarded to Maryland in 2016 for the acceleration and expansion of RA opportunities in the State allowed MD Labor to invest in programs that support and enhance RA expansion strategies, particularly for vulnerable populations, youth, and dislocated workers. Several funding awards have been made. Work in this area is ongoing.

(H) Improving Access to Postsecondary Credentials.

Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including RA certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

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

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

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

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

MI-BEST and ACE

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

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

The Maryland workforce system works closely with the Maryland Association of Community Colleges (MACC) as well as the Maryland Community College Association for Continuing Education and Training (MCCACET), meeting regularly to discuss best practices and system enhancements for co-enrollment of customers, the ETPL, etc.

RAs

Governor Hogan's strategic vision for the workforce system is to provide businesses with the skilled workforce they need to compete in the global, regional, and local economies. A bedrock strategy within that vision is the expansion of RA opportunities. The State's goal is to align RAs with the Maryland's workforce system to ensure that traditional RA expand alongside the creation of new opportunities grounded in labor market demand.

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

to allow competency-based apprenticeships, four new RA Sponsors have been approved in Maryland along with five competency-based occupations.

Maryland has received over $6,800,000 in funding to expand RA from the USDOL since 2016. The latest award comes in the form of the State Apprenticeship Expansion Grant in the amount of $2,854,797.39. These funds will serve to align RAs with the Maryland workforce system and to provide Maryland's businesses with a sustainable pipeline in both traditional and non-traditional industry sectors.

Maryland has devoted the majority of funding from the State Apprenticeship Expansion grant directly into programming that will enable existing RA programs to increase in size while also allowing for significant investments in new RA programs. To capitalize on the success of the 2017 Apprenticeship Innovation Fund (AIF) (over 30 AIF awards have been made) funding for $1.75 million dollars will be devoted to competitive awards. Seven awards of $250,000 each will enable entities to create new RA programs, scale existing programs and enhance strategies to connect Maryland's WIOA target populations to RA opportunities. Additional funding of nearly $700,000 will be allocated in a Related Instruction Reimbursement Fund. This fund will expand RA opportunities for businesses and job seekers by offsetting the cost of registering and training new apprentices.

MD Labor has increased its RA staff to integrate apprenticeship into the Workforce System Maryland by adding Apprenticeship Navigators. A primary area of focus for the Apprenticeship Navigator role is to conduct outreach to the business community, existing sponsors, inactive sponsors, and other potential stakeholder groups. These outreach activities have resulted in the registration of 60 new sponsors and the reactivation of 24 RA Sponsors since September 2016. Additionally staff have worked to expand the Youth Apprenticeship Pilot Program into the AMP. The AMP program provides youth apprenticeship opportunities to participating school systems throughout the state. Originally, a two county pilot program, the AMP has now expanded to 15 total school systems. Presently available to high school students in 15 Maryland counties through their school system, youth apprenticeships are “earn and learn” work opportunities focused on high-growth, high demand industries including occupations related to the manufacturing, science, technology, engineering, and math (STEM) industries. A youth apprentice participating in this program receives paid, supervised, structured, OJT from a mentor in a specific in-demand occupation with the related instruction being provided by the school system, community colleges, union training center, association or online. Youth apprenticeship students work a minimum of 450 hours with a certified employer, while receiving related educational training through their high school. Participating students typically work during the summer after their junior year and during their senior year with a state-approved employer. They work with a mentor to learn valuable skills and earn industry credentials and high school credit. Students also receive training in employability skills, interpersonal/social skills, and general knowledge of the world of work. In the first full year of the AMP expansion the number of youth apprentices has climbed to over 60 with 136 businesses being approved for the program.

MD Labor will increase opportunities for engagement with the business community, jobseekers and RA Sponsors by utilizing a cross training strategy of the Business Solutions, Reentry Navigators, Local Veteran Employment Representatives (LVER) and Apprenticeship and Training

staff. This strategy provides RA strategies be provided by all business facing staff creating an efficient outreach effort for Maryland businesses.

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

Developed by MD Labor, the Career Pathways grant program offers expanded opportunities for adult learners throughout the state. It is a part of Maryland's implementation of the federal WIOA, which serves both jobseekers and businesses. WIOA addresses the needs of jobseekers by establishing a workforce system that helps them access education, training, and support services to gain employment and succeed in the labor market, and employer needs by matching them to the skilled workers they need to compete in the global economy.

These solicitations (three rounds in total), gave all of Maryland's WIOA Local Boards (Title I providers) and Adult Education organizations (Title II providers) the opportunity to participate in grants funding up to $250,000 in funding to develop innovative demonstration projects with a consortium of local partners, including adult education providers and business partners. Eligible applicants were provided a range of recommended interventions that were selected by the department after careful consideration and a review of national best practices. These interventions include:

- RA or pre-apprenticeship,
- Integrated education and training,
- Integrated English literacy and civics education,
- Transition support specialist between local workforce and adult education entities,
- English language acquisition, and
- Distance learning.

During all three funding rounds, a total of $1.5 million in grants have been awarded. First and second round grants were awarded to Local Boards in Anne Arundel, Baltimore City, Mid-Maryland (Howard and Carroll counties), Prince George's County, and Western Maryland (Garrett, Allegany, and Washington counties). Third round grants were awarded to the Local Board in Anne Arundel and Howard Community College. Through innovative strategic investments, the department is changing the way the state approaches workforce development.

ETPL

To expand the number and diversity of high-quality training providers on the ETPL, the State conducted a highly collaborative process to develop a new ETPL policy and processes. The *WIOA Title I Training & Maryland's ETPL* policy,[3] issued in 2017, was designed to encourage the participation of the education and training institutions that play such a pivotal role in building a highly qualified workforce. Outcomes of the new policy indicate the inclusive development process was successful in communicating the value of the list to stakeholders. Applications from

[3] WIOA Title I Training & Maryland's Eligible Training Provider List is accessible at www.dllr.state.md.us/employment/mpi/mpi9-17.pdf

community colleges have seen a sharp increase, and in the short period of time the new policy has been in force, the 55 RA programs have been added. In order to include additional providers on the ETPL, Maryland is requesting a waiver related to the ETPL mentioned in a subsequent section of this Plan.

(I) Coordinating with Economic Development Strategies.

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.

Coordinating with Commerce

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

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

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

(b) State Operating Systems and Policies.

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

(1) The State operating systems that will support the implementation of the State's strategies.

This must include a description of–

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

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

The MWE serves as the data system for a number of WIOA programs: the WIOA Title I Adult, Dislocated Worker, and Youth programs; WIOA Title III Wagner-Peyser employment services, JVSG, SCSEP, MSFW, Dislocated Worker Grants, and Trade. The MWE REX module supports UI claimants alongside the UI modernization efforts currently underway. However, TANF, VR, Adult Education, and the CSBGs use their own data collection systems. Due to contract end dates in 2019 and 2020, as shown in the chart below, the WIOA leadership team recognizes that Maryland needs both short- and long-term solutions and goals to data sharing and alignment.

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

In the short-term, the WIOA leadership team has identified a number of key steps to take while the MD THINK system is in development. Granting WIOA partner agencies "read only" basic access, with the appropriate releases, is one key shorter-term, achievable step towards system alignment. On December 18, 2017, the WIOA partners issued Policy Issuance 2017-10: *Partner Access to the MWE*. The policy allows for read-only access to the MWE be granted to WIOA

partners. The proper Memorandum of Understanding has been executed between partners and confidentiality statements for individual users outline responsibilities to maintain confidentiality and to protect personally identifiable information.

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

(B) Data-collection and reporting processes used for all programs and activities, including those present in the AJCs.

The MWE System

The MWE is the State's online job bank and workforce system that is the foundation, support, and common link aligning Maryland's workforce system to include Labor Market Information Labor Exchange, and workforce case management systems.

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

LACES System

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

AWARE System

DORS utilizes the AWARE VR case management system, a product from Alliance Enterprises. AWARE is a web–based, comprehensive, statewide database of participants, employers, staff, and

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

WORKS System

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

Performance Accountability System and Related Performance Issues

Performance-related support is a regular component of technical assistance and training activities throughout the year provided by the State agencies. In addition to specific performance measure training conferences held as needed, staff participate in roundtables and provide locally customized training upon request. State and local workforce development staff receive quarterly performance reports and data that help them to monitor and continuously improve their participant reporting and performance outcomes.

In addition to locally customized reports that coincide with the USDOL's quarterly performance reporting formats for MWE users, MD Labor computes PY-to-date performance outcomes so that Local Boards can monitor their progress toward meeting negotiated performance goals. MD Labor staff work closely with the local and regional teams to monitor and enhance performance throughout the year. Regularly scheduled training sessions are conducted to provide the local and regional teams with basic and specific training on performance indicators, data entry, and data element validation. MD Labor is also committed to providing bi-annual performance reports, fiscal and other pertinent information regarding workforce programming to both Local Board chairs and chief local elected officials to ensure that both are well-informed of the workforce activities in their respective Local Areas.

DORS also monitors performance on an ongoing basis. DORS staff have access to AWARE VR standardized performance reports on an ongoing basis - weekly, monthly, quarterly, and annual reports. Performance is monitored regularly to ensure progress toward the achievement of performance goals. Additionally, Alliance Enterprises has been working with DORS and other VR agencies to develop new data reporting elements in accordance with WIOA common performance measures. As Alliance Enterprises updates AWARE, DORS will ensure that staff are provided necessary training. Also, DORS staff will continue to work with its workforce partners toward implementing WIOA common performance measures.

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

WIOA Policy Work

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

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

Maryland's 8-Step Process for WIOA Policy Development

1. Determine policy need
2. Policy Session with Subject Matter Experts
3. Policy drafting
4. Review & Comment Period
5. Updates to draft
6. Final approvals
7. Policy dissemination
8. Policy modification (when applicable)

The WIOA Partners have a robust and collaborative operational policy plan in place to guide the state's workforce system. Maryland is committed to implementing WIOA with a true systems approach, and therefore, MD Labor, DORS, DHS, and DHCD are committed to jointly issuing policies, memos, and guidance documents for the WIOA system, in line with the direction of the

GWDB, and as appropriate. Jointly issuing operational policies is Maryland's way of ensuring all staff and system partners, regardless of which agency or organization they represent, will have the same expectations, training, and understanding of how to interact with customers and each other.

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

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

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

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

(3) State Program and State Board Overview

(A) State Agency Organization.

Describe the organization and delivery systems at the state and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

Four Maryland State agencies are responsible for administration and oversight of the State's WIOA System:

- Maryland Department of Labor (MD Labor) – Division of Workforce Development and Adult Learning (DWDAL) and Division of Unemployment Insurance (DUI);
- Maryland State Department of Education (MSDE), Division of Rehabilitation Services (DORS);
- Maryland Department of Human Services (DHS), Family Investment Administration (FIA); and

- Maryland Department of Housing and Community Development (DHCD).

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

Appendix B provides organizational charts to supplement this explanation.

MD Labor – DWDAL

MD Labor's organizational structure includes the Office of the Secretary, Office of the Deputy Secretary, and seven Divisions. As one of the seven Divisions, the DWDAL is responsible for administering the majority of programs set forth in this Combined Plan.

DWDAL's administration activities include:

- Overseeing the state's designated Local Areas;
- Providing guidance to Local Boards on the Development of regional and local plans that support WIOA implementation;
- Developing policies and procedures to guide the overall workforce system;
- Managing the statewide information and technology system for case management, performance reporting, and labor market information – the MWE; and
- Providing technical assistance related to programming and system improvements.

The Governor designated 12 Local Areas in Maryland, as shown in the map below. Each Local Area operates at least one comprehensive AJC, as well as one or more affiliate centers or specialized service access points. A network of 30 AJCs currently serve Maryland job seekers and businesses. A list of AJCs by county is available at the following link: http://www.dllr.state.md.us/county/.

DWDAL works collaboratively with the business-led Boards responsible for governing the implementation of workforce system services delivered in and through local AJCs within their Local Areas.

DWDAL's Organizational Composition

The DWDAL Office of the Assistant Secretary (OAS) ensures Division initiatives and program activities are aligned with the strategic vision for the State's workforce system. The DWDAL OAS coordinates the work of four Offices: 1) the OWD; 2) the Office of Workforce Information and Performance; 3) the Office of Adult Education and Literacy Services; and 4) the Office of Correctional Education.

DWDAL - Office of the Assistant Secretary (OAS)

- *The Policy Unit* identifies and prioritizes policy needs and leads an inclusive policy development process that incorporates broad stakeholder input to produce clear, practical guidance. In addition to policy development, the Policy Unit supports strategic planning

activities within DWDAL and works closely with the Maryland Workforce System's Chief Learning Office to enhance system cohesion through consistent implementation of system-wide policies and best practices.

- *The Professional Development and Technical Assistance Unit* is led by the Chief Learning Officer, whose position is jointly funded by MD Labor, the DHS, and DORS. The role of this Unit is to establish, maintain, and promote a high quality, coordinated professional development system for Maryland's workforce system that is collaboratively developed, cohesively designed, and collectively managed.
- *The New Americans Unit* expedites immigrant integration into the economic and civic life of the state through outreach and community engagement efforts. Through such efforts, the New Americans Unit shares information on training and employment opportunities with immigrants who call Maryland home and promotes adult literacy and English language acquisition for immigrants, including foreign born professionals. The New Americans Unit partners with MORA to jointly co-sponsor the Maryland Skilled Immigrant Task Force. The Task Force works to create a win-win environment in which immigrants are able to secure jobs that match their professional and educational backgrounds while simultaneously meeting the hiring demands of the business community along with DHS MORA. The Task Force focuses on the issues of LEP, addressing challenges associated with complex licensing and credentialing processes, limited experience of Maryland's workforce system in working with foreign-born individuals, and the lack of social capital on the part of immigrants.
- *The Special Grants Unit* oversees the implementation of multiple grant-funded programs that support innovative, integrated workforce system solutions. The Special Grants Unit, administers the EARN Maryland (EARN) program, the State's nationally-recognized, industry-led workforce development model that uses sector strategies to produce long-term solutions to skills gaps and personnel shortages. The unit also oversees multiple grant initiatives designed to address Maryland's serious opioid crisis.
- *Communications and Outreach Unit* works in coordination with other DWDAL units, other Divisions within MD Labor, and external State agencies and other organizations to ensure that accurate, clear, and consistent messaging regarding DWDAL programs and services is effectively relayed to businesses, jobseekers, and the public.
- *The Monitoring and Compliance Unit* provides fiscal and programmatic monitoring of local workforce and adult education entities to ensure compliance with applicable federal and state law.
- *The Fiscal Administration Unit* ensures the effective, prudent and efficient use of public resources in accordance with the laws and regulations established by both the Federal government and the State of Maryland. The Unit does this by establishing and adhering to fiscal controls, administrative systems, and processes. The Fiscal Administration Unit provides meaningful fiscal information to the Division's leadership team that empowers them to align strategic business decisions with the multiple sources of available funding. The Unit manages and assists in maintaining solvency of the funding for all DWDAL programs.

Office of Workforce Development (OWD)

The OWD is comprised of 12 units. Some of these units oversee the implementation of multiple programs, while other focus on a single program. Their specific functions are as follows:

- *The AJC Operations Unit* provides centralized oversight of MD Labor's Labor Exchange Administrators (LEAs). LEAs manage employment and training programs and services throughout the State's AJCs. The AJC Operations Unit administers jobseeker services through Wagner-Peyser and WIOA Title I Adult, Dislocated Worker, and Youth programs funding.
- *The Dislocation Services Unit (DSU)* provides centralized oversight and administration of Rapid Response and Trade Program services:
  - Rapid Response services are designed to reduce or eliminate the time an individual receives UI benefits by quickly connecting businesses and workers impacted by a dislocation event with workforce system resources. Maryland Rapid Response teams work with businesses and jobseekers to customize services, providing them onsite at an affected business or at an alternate location and accommodating work schedules, as needed.
  - *The Trade Program* provides aid to eligible workers who lose their jobs, or whose hours of work and wages are reduced, as a result of increased imports or production transfers abroad. The Trade Program provides trade-affected workers with opportunities to obtain the support, resources, skills, and the credentials they need to return to the workforce in a good job. Trade program services include employment and case management services, training, job search allowances, relocation allowances, reemployment and Alternative / Reemployment Trade Adjustment Assistance wage subsidies for older workers, and income support in the form of Trade Readjustment Allowances (TRA).
- *The Reemployment Services Unit* provides centralized oversight and administration of the RESEA program and the ROW:
  - The RESEA Program*:* 1) assists UI claimants in becoming employed sooner; 2) reduces the number of weeks that UI benefits are paid out to claimants; 3) improves the solvency of the UI trust fund; and 4) reduces fraudulent UI claims and overpayments. The DWDAL and DUI jointly administer the RESEA program, which is available in all Local Areas across the State. State workforce staff funded under the RESEA grant coordinate and facilitate RESEA workshops in AJCs throughout the State, making it easy for participants to smoothly transition from developing an Individual Reemployment Plan (IRP) to accessing services that will help them quickly regain employment.
  - *The ROW Program* is a full-day workshop offered to certain UI claimants to shorten the duration of UI benefits received through reemployment efforts.
- *The POAC Unit* assists recent college graduates and jobseekers otherwise prepared for or with work experience in professional, executive, technical, managerial, and/or scientific occupations to find appropriate employment opportunities. POAC provides employers with access to an e-service program where they can use active marketing approaches to promote employment opportunities.

- *The Veteran Services Unit* operates the JVSG. The JVSG Program offers employment and training services to Veterans with significant barriers to employment and connects employers with work-ready Veterans.
- *The Foreign Labor Certification Program Unit* assists applicable employers, who have obtained USDOL approval to begin the hiring process of permanent or temporary foreign workers. The program assists employers across Maryland in navigating federal program requirements, including application processing, data collection, wage and prevailing practice surveys in specific employment areas where foreign workers have been brought to Maryland.
- *The Tax Credit Unit* administers federal and state tax credit programs that offer income tax incentives to employers for hiring members of targeted population groups, such as ex-offenders or certain individuals with disabilities.
- *Migrant and Seasonal Farmworker (MSFW) Unit* ensures migrant and seasonal farm workers receive the same employment services that non-migrant seasonal farm workers receive at Maryland AJCs.
- *The Reentry Services Unit* works to increase the employability of Maryland citizens with criminal backgrounds. The unit provides technical assistance to jobseekers, staff, and employers to increase the number of individuals hired with criminal history and barriers to employment. As part of the unit's responsibilities, unit staff work with local AJCs to administer the federal Bonding Program.
- *The Youth and Disability Services Unit* provides coordination and technical assistance support to the Local Areas and partner service providers responsible for serving WIOA Title I youth program participants and AJC customers with disabilities.
- *The Business Services Unit* strategically utilizes the resources and expertise of the State and local WIOA partners and other organizations to develop business solutions that meet employer workforce needs, and help companies stabilize and grow throughout the business life cycle.
- *The Apprenticeship and Training Program Unit* works collaboratively with the Maryland Apprenticeship and Training Council to: 1) register apprenticeship programs that meet federal and state standards; 2) issue certificates of completion to apprentices; 3) encourage the development of new programs through outreach and technical assistance; 4) protect the safety and welfare of apprentices; and 5) assure that all programs provide high-quality training.
- *The Senior Community Service Employment Program Unit* assists job seekers 55 or older who are unemployed, meet established low-income guidelines, and desire an opportunity for training an employment, to access training and employment services. SCSEP participants receive training in workplace skills and access to unsubsidized employment, either with nonprofit or government agencies – known at "host agencies" - or private sector employers.

Office of Workforce Information and Performance (OWIP)

OWIP's mission is to collect, analyze, and produce labor market and workforce information as a service to businesses, jobseekers, students, and workforce entities. OWIP is organized into three units that manage: 1) performance and data quality; 2) the MWE, and 3) Labor Market Information.

Additionally, OWIP manages and maintains the Workforce Information Database, the production of industry and occupational employment projections, and other workforce information and economic products and services.

Office of Adult Education and Literacy Services

The Office of Adult Education and Literacy Services provides services to Maryland's adult learners, as required under WIOA Title II. The Office selects local providers of adult education instructional services via a statewide competition. Instructional services include Adult Basic and Secondary Education, English Language Acquisition / Integrated English Literacy and Civics Education, Family Literacy, and High School Diploma preparation.

Maryland's current providers include a wide-range of community colleges, local public school systems, community-based organizations, public libraries, and the state's Correctional Education program. A complete listing of local providers of adult education authorized under Title II can be found at: www.dllr.state.md.us/gedmd/programs.shtml. The Office provides monitoring, technical assistance, professional development, and assistance to these providers, and serves as the State's contact for adult education with the United States Department of Education. The Offices administers Maryland's GED® and National External Diploma Program®, which help adult learners and out-of-school youth to obtain their Maryland High School Diplomas. A complete listing of GED® testing sites in Maryland is found at www.dllr.state.md.us/gedmd/ged.shtml.

Correctional Education

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

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

Occupational Programs Offered by Maryland Correctional Education:

- Architectural CADD
- Automotive Body Repair
- Automotive Maintenance and Inspection
- Building Maintenance
- Fabric and Upholstery Cleaning
- Furniture Upholstery

- Graphic Arts and Design
- Introduction to Word and Excel
- Office Practice and Management
- Office Technology
- Pre-Apprenticeship Carpentry
- Pre-Apprenticeship Electrical
- Pre-Apprenticeship Facilities Maintenance
- Pre-Apprenticeship HVAC/R
- Pre-Apprenticeship Masonry
- Pre-Apprenticeship Plumbing
- Pre-Apprenticeship Sheet Metal
- Pre-Apprenticeship Welding
- Print Communication
- Roofing
- Small Engine Repair
- Warehouse/Distribution
- Woodworking/Finish Carpentry

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

MSDE - DORS

DORS administers Maryland's VR program. DORS provides services and supports to assist eligible students, youth, and adults with significant disabilities transition to postsecondary education, training, and employment. VR services and Pre-Employment Transition Services are provided by the following branches:

- *The Office of Field Services* provides services such as career counseling, assistive technology, vocational training, work readiness training, job development services, and Pre-Employment Transition Services. Staff members are located in 24 field offices located throughout the state, some of which are co-located with AJCs.
- *The Office for Blindness and Vision Services* specializes in services to individuals whose primary disability is blindness or vision loss, to assist them in achieving their goals of employment and of independence in their homes and communities. The Office oversees the Maryland Business Enterprise Program (BEP) for the Blind, a program that prepares individuals who are legally blind to operate vending, gift, or food service businesses in public facilities, in accordance with the Randolph Sheppard Act.
- *The Workforce and Technology Center* is a comprehensive VR facility that offers career assessment services, career and skills training, job placement assistance, Assistive Technology services, and other medical and support services. A complete listing of DORS Regions and Offices is available at the following link: http://dors.maryland.gov/resources/Pages/locations.aspx.

DHS –FIA

Maryland refers to the TANF program as the TCA program. The TCA program is implemented through LDSSs, located in all of the State's 24 jurisdictions. The locations of LDSS offices and contact information can be accessed at http://dhs.maryland.gov/local-offices. Through LDSS service points, workforce system customers may access or receive referrals to education, job training, job placement, and other services to help them overcome employment barriers and obtain self-sustaining employment.

MD LABOR-DUI

DUI administers Maryland's UI compensation program, as well as some components of the Trade Program. DUI processes UI claims and serves qualified UI recipients. DUI staff work collaboratively with DWDAL-OWD staff responsible for delivering RESEA and ROW programs, to assist unemployed Marylanders in determining their eligibility for and access to UI benefits.

The Community Service Block Grant

The Community Service Block Grant is administered by the Maryland DHCD, Division of Neighborhood Revitalization and their local grantees in the State's CAAs. The program's primary objective is to develop viable communities, principally for persons of low- to moderate-incomes, by providing decent housing and suitable living environments, and through the expansion of economic opportunities.

The Reentry Employment Opportunities (REO) Program

The REO program provides funding authorized as Research and Evaluation under Section 169, of WIOA for justice-involved youth, young adults, and formerly incarcerated adults. The REO grants are available to organizations with IRS 501(c)(3) non-profit status, including women's and minority organizations; state or local governments; or any Indian and Native American entity eligible for grants under Section 166 of WIOA to develop or expand programs to improve employment opportunities for adults ages 18-24 who have been incarcerated in the youth or adult criminal justice system, and adults ages 25 or older, released from prison or jail within two years of enrollment. Maryland currently has five REO grantees, all operating in Baltimore, City. Goodwill Industries International, Inc.; Living Classrooms Foundation; and Volunteers of America Chesapeake, Inc. are serving adults. Family Health International and Structured Employment Economic Development Corporation are serving young adults.

(B) State Board.
Provide a description of the State Board, including-

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

The Membership Roster shown below is also available online at:

http://www.gwdb.maryland.gov/board/members.shtml

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

Louis M. Dubin, *Board Chair*
Managing Partner, Redbrick LMD

Christopher Sachse, *Board Vice-Chair*
Chief Executive Officer (CEO), ThinkStack

Sam J. Abed
Secretary, Department of Juvenile Services

Mick Arnold
President, Arnold Packaging

Hon. Vanessa Atterbeary
State Delegate, Maryland General Assembly

John D. Barber, Jr.
President of Local 177, Northeast Regional Council of Carpenters

Carol Beatty
Secretary, Maryland Department of Disabilities

Alice A. Blayne-Allard
Owner, Free State Cooperage, LLC

Gary E. Bockrath
Consultant, Operational & Financial
Tatum

Jennifer W. Bodensiek
President & CEO
Junior Achievement of Central Maryland

Gavin Buckley
Mayor, City of Annapolis

Andrea E. Chapdelaine, Ph.D.
President, Hood College

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

Michelle Day
Director, Frederick County Workforce Services
President, MWA

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

James D. Fielder
Secretary, Maryland Higher Education Commission

Bernie Fowler
Founder and President, Farming 4 Hunger, Inc.

Wanda Smith Gispert
Regional Vice President, Workforce Development, MGM Resorts International

Robert L. Green
Secretary, DPSCS

Steven W. Groenke
Chief Executive Officer, Storbyte, Inc.

Kevin D. Heffner
President and CEO, LifeSpan Network

Hon. Cheryl Kagan
State Senator, Maryland General Assembly

Rona E. Kramer
Secretary
Maryland Department of Aging

Sandra Kurtinitis
President
Community College of Baltimore County, *representing* the Maryland Association of Community Colleges (MACC)

Andrew B. Larson
National Project Coordinator, International Union of Painters and Allied Trades, Job Corps Program

Larry Letow
President, LG-TEK

Carl Livesay
Vice President Operations, Maryland Thermoform Corporation

Aminah "Amie" J. Long
Human Resources Director, Chaney Enterprises

Roya Mohadjer
Business Development and Strategy, Social and Scientific Systems, Inc.

Gary E. Murdock
Training Director, Steamfitters Local 602

Chad J. Nagel
Vice President, Nagel Farm Service

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

Alexander G. Núñez
Sr. Vice President, BGE Regulatory and External Affairs, BGE

George W. Owings, III
Secretary, Department of Veterans Affairs

Lourdes R. Padilla
Secretary, DHS

Charles A. Ramos
Consultant

Charles A. Ramos
Consultant

Tiffany P. Robinson
Secretary, MD Labor

Edward C. Rothstein (COL Ret)
Commissioner, Carroll County Commissioners Office

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

Karen Salmon
State Superintendent of Schools, MSDE

Kelly M. Schulz
Secretary, Department of Commerce

Martin "Marty" Schwartz
President, Vehicles for Change

James A. Sears, Jr.
President, Maryland Operations, Potomac Edison

Gerald M. Shapiro
President, Shapiro & Duncan, Inc.

Leslie R. Simmons
President, EVP, LifeBridge Health

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

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

Charles R. Wetherington
President, BTE Technologies, Inc.

Michelle J. Wright
President, Certus Consulting, LLC

Charnetia V. Young
National Business Development Manager, CVS Health

VACANCIES: 2

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

The GWDB is the Governor's chief policymaking body for workforce development. As mandated by WIOA, the GWDB is a business–led board of 53 members, a majority of whom represent the business community. Specifically, 27 members represent business, 11 represent workforce, and 15 represent government. Members include the Governor, cabinet secretaries, college presidents, the State Superintendent of Schools, elected officials, labor, and representatives of non–profit organizations.

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

The Executive Director of the GWDB and a leadership team from MD Labor's DWDAL attend meetings of the MWA, a coalition of executive directors from Maryland's 12 local workforce agencies that meet on a monthly basis to discuss matters pertaining to the workforce system and exchange information on current issues.

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

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

(A) Assessment of Core Programs.

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

Measuring Maryland's Success: Performance Accountability

WIOA made changes to the performance accountability system and created a requirement that the United States Secretaries of Labor and Education create a statistical adjustment model that replaces the regression-based levels that the USDOL used in performance negotiations under the Workforce Investment Act of 1998. USDOL created such a model and states were able to negotiate Program Year (PY) 2018 and PY2019 standards using the model for several measures not indicated as baseline.

Under WIOA Adult, Dislocated Worker, JVSG, Wagner-Peyser, Title II and Title IV Performance Measures are as follows:

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

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

WIOA Youth Performance Measures

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

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

WIOA Effectiveness in Servicing Employers Measures

- Employer Penetration Rate- addresses the programs' efforts to provide quality engagement and services to all employers and sectors within a state and local economy.

Percentage of employers using WIOA core program services out of all employers in the state.

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

States must select two of the three measures above to report on for PY2018 and PY2019. Maryland chose to report on all three for PY2018 in an effort to provide a complete picture of how the programs are currently engaging with employers and meeting their needs.

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

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

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

As previously noted, Maryland's WIOA partners are dedicated to placing customers at the heart of the WIOA system. The *Benchmarks for Success* is one leadership tool that the WIOA partners have developed to drive innovation and collaboration in the State's Workforce System.

Maryland's WIOA partners are further committed to conducting ongoing evaluations of workforce activities carried out in the state in order to promote, establish, implement, and utilize methods for continuously improving core program activities. This will allow the WIOA system to achieve high-level performance within, and high-level outcomes from the workforce development system.

Core WIOA Programs

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

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

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

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

Title III Wagner-Peyser (Employment Services) and JVSG is exempted from Credential Attainment and Measurable Skill Gains. Effectiveness in Serving Employers is a pilot measure, where states must select two of the three federal proposed metrics. This measure is measured across all six core programs. Data sharing agreements are required to secure data from Rehabilitation in order to report these measures for PY2017 and thereafter. For PY2018 Maryland selected to report all three effectiveness measures. WIOA explains that each state shall identify within the State Plan its expected levels of performance for each primary indicator, for each program, for the first two PYs covered by the State Plan. The law subsequently explains that the levels agreed to by the state, the Secretary of Labor, and the Secretary of Education, shall be considered to be the state adjusted performance and shall be incorporated into the State Plan prior to its approval. Maryland received from USDOL further guidance on the WIOA performance measures via Training and Employment Guidance Letters (TEGL 10-16 Change 1) and Training and Employment Notices (TENs). Maryland's WIOA partners are committed to continuing to work closely with USDOL in anticipation of additional information.

(B) Assessment of AJC Program partner Programs.

Describe how other AJC delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. Such state assessments should take into account local and regional planning goals.

TANF

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

- WPR – The total number of work eligible TANF recipients that have met their work requirement, averaging 30 hours per week (20 hours a week for single parents with one or more children under six years old), in the month. In addition to the federal WPR, Maryland assesses performance based on the following indicators:
    - Job Placements – The total number of TANF recipients that were placed in a subsidized public employment, subsidized private employment, unsubsidized employment, or OJT activity;
    - Ten Dollar per Hour Job Placements – The total number of TANF recipients that were placed in a subsidized public employment, subsidized private employment, unsubsidized employment, or OJT activity and scheduled for 30 hours per week or more; and
    - Job Retention – Achieve a job retention rate of 75 percent.

Maryland DHS will continue to focus on the primary federal TANF performance measure of 50 percent for WPR. In addition to WPR, DHS will begin to provide and report out data on TANF outcomes for the first three proposed Common Measures: Employment, Retention, and Median Wages.

Trade Program

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

JVSG Program

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

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

Should the state fall short of its negotiated targets, USDOL's Veterans Employment Training Services (VETS) provides technical assistance to help the state achieve success in providing Veterans with employment services that lead to viable opportunities for employment. In accordance with TEGL 8-16, the WIOA core program indicators and reporting requirements now also apply to the JVSG program; Employment Rate Quarter 2, Median and Employment Rate Quarter 4. JVSG also negotiates performance of all veterans for Employment Rate Quarter 2, Median and Employment Rate Quarter 4

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

Preceding Performance

Maryland's previous assessment results are, as follows:

Table: Title I and Title III Performance – Maryland PY 2017 / FY 2018

		Standard	MD Performance	% Standard Achieved
Employment Rate QTR2	Adults	**72%**	**76.9%**	106.8%
	Dislocated Workers	**80%**	**82.6%**	103.2%
	Labor Exchange	**55%**	**63.6%**	115.7%
Employment Rate QTR4	Adults	**70%**	**76.7%**	109.6%
	Dislocated Workers	**75%**	**80.5%**	107.3%
	Labor Exchange	**55%**	**64.7%**	117.7%

		Standard	MD Performance	% Standard Achieved
Median Earnings	Adults	**$6,500**	**$5,994**	92.2%
	Dislocated Workers	**$7,800**	**$8,123**	104.1%
	Labor Exchange	**$5,000**	**$5,505**	110.1%
	Youth		**$3,363**	**Baseline**
Youth Education and Employment Rate QTR2		**60%**	**73.5%**	122.5%
Youth Education and Employment Rate QTR4		**60%**	**76.6%**	127.7%
Credential Attainment	**Adults**	**57%**	**73.9%**	129.7%
	Dislocated Workers	**55%**	**70.5%**	128.3%
	Youth	**60%**	**76.5%**	127.5%
Measurable Skills Gains	**Adults**		**47.5%**	**Baseline**
	Dislocated Workers		**40.6%**	**Baseline**
	Youth		**44.7%**	**Baseline**
Employer Effectiveness Measures				
Retention With Same Employer			**62.8%**	**Baseline**
Penetration Rate			**8.8%**	**Baseline**
Repeat Business			**40.9%**	**Baseline**

Table: Title I and Title III Performance – Maryland PY 2018 / FY 2019

		Standard	MD Performance	% Standard Achieved
Employment Rate QTR2	Adults	**75%**	**76.3%**	101.7%
	Dislocated Workers	**80%**	**84.4%**	105.5%
	Labor Exchange	**58%**	**66.7%**	115.0%
Employment Rate QTR4	Adults	**71%**	**74.9%**	105.6%
	Dislocated Workers	**76%**	**83.2%**	109.5%

	Labor Exchange	**57%**	**68.0%**	119.2%
Median Earnings	Adults	**$5,900**	**$6,963**	118.0%
	Dislocated Workers	**$7,900**	**$9,585**	121.3%
	Labor Exchange	**$5,000**	**$6,209**	124.2%
	Youth		**$3,386**	**Baseline**
Youth Education and Employment Rate QTR2		**67%**	**75.8%**	113.2%
Youth Education and Employment Rate QTR4		**61%**	**75.8%**	124.3%
Credential Attainment	**Adults**	**58%**	**63.8%**	109.9%
	Dislocated Workers	**56%**	**59.2%**	105.7%
	Youth	**65%**	**66.2%**	101.8%
Measurable Skills Gains	**Adults**		**65.8%**	**Baseline**
	Dislocated Workers		**69.4%**	**Baseline**
	Youth		**46.6%**	**Baseline**
Employer Effectiveness Measures				
Retention With Same Employer			**66.4%**	**Baseline**
Penetration Rate			**8.3%**	**Baseline**
Repeat Business			**30.6%**	**Baseline**

WIOA Title II Adult Education

Measurable Skill Gains by Entry Level, July 1, 2018 – June 30, 2019

Table: First Period of Participation

Entering Educational Functioning Level	Number of Participants	Total Number of Participants Excluded from MSG Performance	Total Attendance Hours for All Participants	Number Who Achieved at Least One Educational Functioning Level Gain	Number Who Attained a Secondary School Diploma or Recognized Equivalent	Number Separated Before Achieving Measurable Skill Gains	Number Remaining in Program Without Measurable Skill Gains	Percentage Achieving Measurable Skill Gains
ABE Level 1	435	0	44751.65	197	1	143	94	45.5
ABE Level 2	2628	2	268975.93	1085	19	1012	510	42.0
ABE Level 3	4098	3	377164.38	1293	245	1778	779	37.6

Entering Educational Functioning Level	Number of Participants	Total Number of Participants Excluded from MSG Performance	Total Attendance Hours for All Participants	Number Who Achieved at Least One Educational Functioning Level Gain	Number Who Attained a Secondary School Diploma or Recognized Equivalent	Number Separated Before Achieving Measurable Skill Gains	Number Remaining in Program Without Measurable Skill Gains	Percentage Achieving Measurable Skill Gains
ABE Level 4	2810	1	197537.36	481	349	1307	672	29.5
ABE Level 5	684	1	41678.97	151	140	270	122	42.6
ABE Level 6	392	0	21617.69	15	130	172	75	37.0
ABE Total	11047	7	951725.98	3222	884	4682	2252	37.2
ESL Level 1	870	1	65514.55	440	0	319	110	50.6
ESL Level 2	1209	0	83823.07	641	0	420	148	53.0
ESL Level 3	3336	0	239294.03	1587	0	1275	474	47.6
ESL Level 4	3935	0	289100.32	1690	0	1646	599	42.9
ESL Level 5	2932	0	219604.89	1182	0	1248	502	40.3
ESL Level 6	1927	0	133854.27	473	0	968	486	24.5
ESL Total	14209	1	1031191.13	6013	0	5876	2319	42.3
Grand Total	25256	8	1982917.11	9235	884	10558	4571	40.1

Table: All Periods of Participation

Entering Educational Functioning Level	Total Number of Periods of Participation	Total Number of Periods of Participation in Which Participants Achieved at Least One Educational Functioning Level Gain	Total Number of Periods of Participation in Which a Secondary School Diploma or Its Recognized Equivalent Was Attained	Percentage of Periods of Participation with Measurable Skill Gains
ABE Level 1	442	199	1	45.2
ABE Level 2	2656	1090	19	41.8
ABE Level 3	4179	1306	249	37.2
ABE Level 4	2876	486	350	29.1
ABE Level 5	691	153	140	42.4
ABE Level 6	399	16	131	36.8
ABE Total	11243	3250	890	36.8
ESL Level 1	882	442	0	50.1
ESL Level 2	1227	646	0	52.6
ESL Level 3	3405	1614	0	47.4
ESL Level 4	4062	1735	0	42.7
ESL Level 5	2990	1203	0	40.2
ESL Level 6	1959	479	0	24.5
ESL Total	14525	6119	0	42.1
Grand Total	25768	9369	890	39.8

Table: Educational Functioning Level Gain and Attendance for Pre- and Post-Tested Participants, July 1, 2018 – June 30, 2019

Entering Educational Functioning Level	Total Number Enrolled	Total Attendance Hours	Number with EFL Gain	Number Separated Before Achieving EFL Gain	Number Remaining Within Level	Percentage Achieving EFL Gain
ABE Level 1	278	38376.33	197	34	47	70.9
ABE Level 2	1612	231662.43	1107	261	244	68.7
ABE Level 3	2467	319461.78	1431	587	449	58
ABE Level 4	1477	148298.57	593	503	381	40.1
ABE Level 5	341	30848.76	154	110	77	45.2
ABE Total	6175	768647.87	3482	1495	1198	56.4
ESL Level 1	536	55080.42	441	41	54	82.3
ESL Level 2	793	71480.11	640	89	64	80.7
ESL Level 3	2265	206985.66	1587	375	303	70.1
ESL Level 4	2762	255008.47	1696	628	438	61.4
ESL Level 5	2096	195199.25	1172	556	368	55.9
ESL Level 6	1405	117759.16	455	547	403	32.4
ESL Total	9857	901513.07	5991	2236	1630	60.8
Total	16032	1670160.94	9473	3731	2828	59.1

Core Follow-Up Outcome Achievement, July 1, 2018 – June 30, 2019

Table: First Period of Participation

Primary Indicators of Performance	Number of Participants who Exited	Number of Participants who Exited Achieving Outcome or Median Earnings Value	Percentage of Participants Achieving Outcome
Employment Second Quarter after exit	19,137	6,241	32.61%
Employment Fourth Quarter after exit	19,773	6,709	33.93%
Median Earnings Second Quarter after exit	19,137	$5,084.00	N/A
Attained a Secondary School Diploma/Equivalent and Enrolled in Postsecondary Education or Training within one year of exit	1,632	571	34.98%
Attained a Secondary School Diploma/Equivalent and Employed within one year of exit	1,632	636	38.97%
Attained a Postsecondary Credential while enrolled or within one year of exit	183	12	6.55%
Attained any credential (unduplicated)	1,801	54	2.99%

Table: All Periods of Participation

Primary Indicators of Performance	Total Periods of Participation	Total Number of Periods of Participation in which Participants Achieved Outcome or Median Earnings Value for All Periods of Participation	Percentage of Participants in All Periods of Participation Achieving Outcome
Employment Second Quarter after exit	19,463	6,249	32.10%
Employment Fourth Quarter after exit	21,055	6,781	32.20%
Median Earnings Second Quarter after exit	19,463	$5,181.00	N/A
Attained a Secondary School Diploma/Equivalent and Enrolled in Postsecondary Education or Training within one year of exit	1,655	580	35.04%
Attained a Secondary School Diploma/Equivalent and Employed within one year of exit	1,655	658	39.75%
Attained a Postsecondary Credential while enrolled or within one year of exit	193	14	7.25%
Attained any credential (unduplicated)	1,834	55	2.99%

WIOA Title IV VR

Table: DORS - Federal Standards & Indicators Report, Federal FYs 2015 & 2016

Standard	Federal FY15	Federal FY16	Federal Standard
Number of Closed Cases with an Employment Outcome	2,559	2,565	At least one more than the previous year.

Standard	Federal FY15	Federal FY16	Federal Minimum Standard
Of the Closed Cases that received services, the percentage with an Employment Outcome	59.65%	60.75%	55.80%
Of the Closed Cases with an Employment Outcome, the percentage that have a wage greater than or equal to Minimum Wage.	90.47%	90.91%	72.60%

Standard	Federal FY15	Federal FY16	Federal Minimum Standard
Of the Closed Cases with an Employment Outcome, the percentage that have a wage greater than or equal to the Minimum Wage and have Significant Disabilities.	100.00%	100.00%	62.40%
Ratio of Average State Wage to the average wage of Closed Cases with Employment Outcome that have wages greater than or equal to Minimum Wage.	0.44	0.45	0.52
Difference between the percentage of Closed Cases with Employment Outcomes that have a wage greater than or equal to the Minimum Wage that are Self Support at Application and the percentage of Closed Cases with Employment Outcomes that have a wage greater than or equal to the Minimum Wage that are Self Support at Closure.	68.596	61.504	53.000
Ratio of Minority Service Rate to Non-Minority Service Rate	0.897	0.98	0.800

TANF

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

Jurisdiction	WPR	Total Job Placements	Total Full-Time $10/hr. Job Placements
Large Counties			
Baltimore City	52%	5030	1020
Baltimore County	55%	1713	514
Prince George's	65%	1099	281
Medium Counties			
Anne Arundel	56%	1232	375
Montgomery	56%	768	235
Wicomico	55%	322	47
Harford	55%	476	134
St. Mary's	55%	261	20
Howard	42%	262	65
Washington	62%	246	41
Cecil	50%	227	48
Small Counties			
Frederick	67%	360	137

Jurisdiction	WPR	Total Job Placements	Total Full-Time $10/hr. Job Placements
Charles	54%	130	31
Allegany	58%	139	12
Dorchester	54%	90	8
Caroline	79%	117	14
Carroll	56%	106	36
Somerset	54%	128	19
Queen Anne's	67%	70	10
Calvert	68%	108	25
Worcester	73%	67	15
Garrett	55%	35	3
Talbot	33%	55	22
Kent	57%	74	14
MARYLAND	**55%**	**13,115**	**3,126**

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

Jurisdiction	WPR	Total Job Placements	Total Full-Time $10/hr. Job Placements
Large Counties			
Baltimore City	52%	5,572	1,301
Baltimore County	54%	1,611	563
Prince George's	63%	1,147	285
Medium Counties			
Anne Arundel	52%	1,184	379
Montgomery	59%	748	265
Wicomico	53%	303	54
Harford	58%	471	135
St. Mary's	56%	277	28
Howard	67%	204	52
Washington	65%	246	67
Cecil	49%	237	66
Small Counties			
Frederick	67%	322	100
Charles	59%	149	45
Allegany	52%	146	11
Dorchester	57%	107	13
Caroline	71%	94	20

Jurisdiction	WPR	Total Job Placements	Total Full-Time $10/hr. Job Placements
Carroll	54%	119	36
Somerset	53%	112	17
Queen Anne's	63%	43	7
Calvert	68%	98	18
Worcester	61%	66	24
Garrett	63%	29	7
Talbot	23%	73	20
Kent	59%	55	6
MARYLAND	**55%**	**13,413**	**3,519**

Trade Program

Table: FY2016

	Goal	FY16 Q1 (As of 03/10/16)	FY16 Q2 (As of 05/31/16)	FY16 Q3 (As of 09/01/16)	FY16 Q4 (As of 12/09/16)
Training Expenditures	85% - 115%	Discrepancy	Discrepancy	Discrepancy	Explained
TRA Expenditures	85% - 115%	Pass	Pass	Pass	Explained
A/RTAA Expenditures	85% - 115%	Pass	Pass	Pass	Explained
Job Search/ Relocation Expense	85% - 115%	Pass	Pass	Pass	Explained
Tenure	100%	100.0%	100.0%	100.0%	100.0%
ONET	100%	83.1%	89.7%	100.0%	100.0%
ISP	100%	100.0%	100.0%	100.0%	100.0%
NAICS	90%	97.1%	100.0%	100.0%	100.0%
Credential	70%	54.4%	51.6%	67.0%	69.3%
Rapid Response	55%	60.6%	40.0%	60.0%	64.9%
Case Management	50%	87.7%	85.5%	79.4%	81.8%
Training Completion	75%	56.3%	67.5%	69.2%	80.2%
Agent Liable	75%	89.2%	84.8%	75.7%	77.3%
Employment After Exit	100%	100.0%	100.0%	100.0%	100.0%
Wages Prior	100%	100.0%	100.0%	100.0%	100.0%
Wages Following	100%	100.0%	100.0%	100.0%	100.0%

Table: FY2017

Measure	Target	FY17 Q1 (As of 03/01/17)	FY17 Q2 (As of 05/24/17)	FY17 Q3 (As of 09/08/17)	FY17 Q4
Training Expenditures	85% - 115%	Pass	Discrepancy	Discrepancy	
TRA Expenditures	85% - 115%	Discrepancy	Pass	Pass	
A/RTAA Expenditures	85% - 115%	Pass	Discrepancy	Pass	
Job Search/ Relocation Expense	85% - 115%	Pass	Pass	Pass	
Tenure	100%	100.0%	100.0%	100.0%	
ONET	100%	100.0%	100.0%	100.0%	
ISP	100%	100.0%	100.0%	100.0%	
NAICS	90%	99.5%	100.0%	97.2%	
Credential	70%	71.6%	75.6%	72.9%	
Rapid Response	55%	75.9%	73.7%	68.9%	
Case Management	75%	89.6%	86.7%	83.3%	
Training Completion	75%	83.8%	81.9%	78.7%	
Agent Liable	75%	88.4%	85.7%	83.2%	
Employment After Exit	100%	100.0%	100.0%	100.0%	
Wages Prior	100%	100.0%	100.0%	100.0%	
Wages Following	100%	100.0%	100.0%	100.0%	

Table: FY2018

Measure	Target	FY18 Q1 (As of 03/22/18)	FY18 Q2 (As of 06/08/18)	FY18 Q3 (As of 09/10/18)	FY18 Q4 (As of 01/02/19)
Training Expenditures	85% - 115%	Discrepancy	Discrepancy	Pass	Discrepancy
TRA Expenditures	85% - 115%	Discrepancy	Pass	Pass	Discrepancy
A/RTAA Expenditures	85% - 115%	Discrepancy	Pass	Pass	Pass
Job Search/ Relocation Expense	85% - 115%	Pass	Pass	Pass	Pass
Tenure	100%	100.0%	100.0%	100.0%	100.0%
ONET	100%	100.0%	100.0%	100.0%	100.0%
IEP	100%	100.0%	100.0%	100.0%	100.0%
NAICS	90%	93.9%	97.1%	96.7%	96.4%

Measure	Target	FY18 Q1 (As of 03/22/18)	FY18 Q2 (As of 06/08/18)	FY18 Q3 (As of 09/10/18)	FY18 Q4 (As of 01/02/19)
Credential	70%	70.0%	85.7%	83.9%	81.5%
Rapid Response	55%	75.4%	66.7%	62.2%	65.4%
Case Management	75%	75.3%	87.9%	86.3%	86.6%
Training Completion	75%	75.0%	80.0%	79.5%	87.1%
Co-Enrollment	50%	3.9%	3.2%	4.4%	7.1%
Employment After Exit	100%	100.0%	100.0%	100.0%	100.0%
Wages Prior	100%	100.0%	100.0%	100.0%	100.0%
Wages Following	100%	100.0%	100.0%	100.0%	100.0%

JVSG

Table: PY2015 Veteran Program Assessment Results

DVOP Specialists (Source VET-200A)	Negotiated Targets	Q-4 Performance	% of standard
Intensive Services Provided to Individuals by DVOP Specialists/Total Veterans and Eligible Persons Served by DVOP Specialists in the State (*New*)	90%	85%	94%
Veterans' Entered Employment Rate (VEER) *Weighted*	60%	68%	113%
Veterans' Employment Retention Rate (VERR)	83%	81%	98%
Veterans' Average Earnings (VAE) (Six-Months)	$19,400	$18,556	96%
Disabled Veterans' EER (DVEER)	49%	51%	104%
Disabled Veterans' ERR (DVERR)	83%	81%	98%
Disabled Veterans' AE (DVAE) (Six Months)	$22,600	$21,872	97%

Performance Targets for Labor Exchange Services for Veterans (Source: ETA-9002D)	Negotiated Targets	Q-4 Performance	% of standard
Veterans' Entered Employment Rate (VEER)	52%	55%	106%
Veterans' Employment Retention Rate (VERR)	84%	81%	96%
Veterans' Average Earnings (VAE) (Six-Months)	$19,700	$19,957	101%
Disabled Veterans' EER (DVEER)	50%	49%	98%
Disabled Veterans' ERR (DVERR)	84%	83%	99%
Disabled Veterans' AE (DVAE) (Six Months)	$23,000	$22,809	99%

Table: PY2017 WIOA Veteran Program Assessment Results

DVOP Specialists	Negotiated Targets	Q-4 Performance
Employment Rate QTR2		57.2%
Employment Rate QTR4		53.5%
Median		$7,018
Veterans' Employment Rate QTR2		56.7%
Veterans' Employment Rate QTR4		53.4%
Veterans' Median		$6,960
Disabled Veterans' Employment Rate QTR2		54.1%
Disabled Veterans' Employment Rate QTR4		52.4%
Disabled Veterans' Median		$7,884

Table: PY2018 WIOA Veteran Program Assessment Results

DVOP Specialists:	Negotiated Targets	Q-4 Performance	% of standard
Employment Rate QTR2	55%	57.5%	104.5%
Employment Rate QTR4	52%	55.9%	107.5%
Median	$6,800	$7,253	106.7%
Veterans' Employment Rate QTR2 (WP)	55%	60.3%	109.6%
Veterans' Employment Rate QTR4 (WP)	52%	59.1%	113.7%
Veterans' Median (WP)	$6,800	$6,939	102.0%

(D) Evaluation.

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

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

agency independently, can be coordinated to provide a comprehensive, deeper look at the overall WIOA system.

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

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

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

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

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

Maryland distributes WIOA Title I Youth funds in accordance with the formula allocation method cited in WIOA Section 128 (b)(2)(A). Maryland decided not to set aside the allowable 15 percent of the funds, but rather to set aside 14 percent of the funds for the Governor's Reserve. Eighty-six percent of funds will be distributed to the Local Areas using the following three factors enumerated in Section 127(b)(1)(C) of WIOA:

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

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

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

Maryland will distribute WIOA Title I Adult funds in accordance with the formula allocation method cited in WIOA Section 133 (b)(2)(A). Maryland decided not to set aside the allowable maximum of 15 percent, but to rather set aside 14 percent of the funds as the Governor's Reserve. Eighty-six percent of funds will be distributed to the Local Areas using the following three factors enumerated in Section 132(b)(1)(B) of WIOA:

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

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

(iii) Dislocated worker employment and training activities in accordance with WIOA section133(b)(2) and based on data and weights assigned.

Maryland will distribute WIOA Title I Adult funds in accordance with the formula allocation method cited in WIOA Section 133 (b)(2)(A). Fourteen percent of the funds will be set aside as the Governor's Reserve, 17.5 percent of the funds will be set aside for Rapid Response Activities (the allowable maximum for Rapid Response is 25 percent), and 68.5 percent of funds will be distributed to the Local Areas.

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

1. UI Exhaustee,

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

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

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

1. Priority Weighting Unemployed 49 percent;
2. UI Exhaustee 29 percent;
3. Declining Industries eight percent;
4. Mass Layoffs/Plant Closings (WARN and other data) seven percent; and
5. Farmer/Rancher Data seven percent.

Table: Factors and weighting for the Dislocated Workers local formula allocations

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

In accordance with TEGL 19-16, Local Areas that would receive less than 90 percent of their relative share as compared to their last two years' funding level will be held at 90 percent. Again, it is noted that pursuant to Policy Issuance 2016-01, *Transfer Authority for WIOA Title I Adult and Dislocated Worker Funds*, as issued on January 12, 2016, and consistent with Section 133 of WIOA, a Local Area may transfer up to and including 100 percent of a PY and FY allocation for Adult employment and training activities, and up to and including 100 percent of a PY and FY allocation for Dislocated Worker employment and training activities between the two programs. Transfers may only occur between Adult and Dislocated Worker funds within the same funding phase.

B. Title II

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

For the Title II Adult Education fund, Maryland awards grants to eligible providers through a competitive application process to establish or operate programs that provide adult education and literacy activities. The application process is open to eligible providers for seamless delivery of services, ensuring that services are available in every jurisdiction based on the level of need. The services provided must focus on the adult education goals described in WIOA Title II, including helping adults to become literate and obtain the knowledge and skills necessary for employment and self-sufficiency. In 2020, the DWDAL Office of Adult Education and Literacy Services (AELS) released a competitive grant application for Adult Education and Family Literacy Services in Maryland, authorized and funded under WIOA Title II.

The development process for this competitive grant application included input from partner programs overseen by DWDAL's Office of the Assistant Secretary and OWD, as well as the external WIOA partners. The competitive grant application was posted on the MD Labor website in January 2020, seeking local providers of services to commence operation on July 1, 2020, continuing for a 3-year period, pending compliance with all requirements of the grant. During the 3-year period, annual continuation applications are required that must include activity and partnership updates, performance reviews and projections, annual class schedules, data quality reviews, budgets and assurances.

All applicants for WIOA Title II funding were required to submit a proposal in response to this competitive grant application. A separate grant application was required for English Literacy and Civics Education (IELCE) as required under Section 243 of WIOA, Title II This application followed the same process of development and dissemination as the competitive grant application for Adult Education and Family Literacy Services.

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

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

The following services are funded:

Table: Adult Education & Family Literacy Act Services

Adult Basic Skills Education Programs	Maryland adult education programs provide instruction in adult basic skills for adults with low basic skills, or low educational attainment, and will helping the most vulnerable adults to gain access to the services they need
Adult Secondary Education Programs	Adult secondary education instruction are provided for students functioning at the adult secondary education level in preparation for a high school diploma through GED® testing or the National External Diploma Program®
English Language Acquisition Programs	English language acquisition programs are provided, especially in jurisdictions with a high population of English language learners. Instructional programs will be required to incorporate mathematics instruction as required by law.
Integrated English Literacy & Civics Education	The integrated English literacy and civics education provides instruction that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens. Such services include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation. This may also include workforce training (depending on which section of services are provided).

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

As the oversight and administrative agency for WIOA Title II adult education programs, MD Labor evaluates past performance in delivering adult education and family literacy activities, in order to assess the effectiveness of applicants during the competitive process. Selected applicants must document success in providing adult education and literacy services.

MD Labor convened one statewide application process for eligible providers. Title II providers in each jurisdiction will be selected on the basis of this competition. The MD Labor office of AELS was responsible for developing and disseminating the grant application for services to be delivered by local providers, as authorized and funded under WIOA Title II. The competitive grant application was posted publicly on the MD Labor website. Only providers who responded to the competitive grant application in a timely manner, adhering to all submission requirements and deadlines will be considered for funding under WIOA Title II. Funds will not be awarded to providers who did not apply for funds under this uniform competition.

MD Labor will directly awarded grants to providers deemed to have successfully responded to the competitive grant application requirements and satisfactorily documented previous success in providing the services. Sub-contracts will be considered for funding. Proposals submitted in

response to the competitive grant application will be reviewed by AELS, along with an independent team of reviewers that includes individuals with knowledge and expertise in adult education, WIOA partner agency officials, and DWDAL personnel. Reviewers will score applications on the considerations set out in WIOA, Title II, Section 231.

(C) Title IV VR.

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

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

(6) Program Data

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

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

Table: WIOA Program Data and System Alignment

WIOA Program	Data System(s) Used	Year Contract Expires
Adult Program	MWE	2020
Dislocated Worker Program	MWE	2020
Youth Program	MWE	2020
Wagner-Peyser Act Program	MWE	2020
Adult Education and Family Literacy Act Program	Literacy and Community Education System	2020
VR Program	AWARE	2020
TANF Program	WORKS	--
Trade Adjustment Assistance for Workers Program	MWE	2020
JVSG Program	MWE	2020

WIOA Program	Data System(s) Used	Year Contract Expires
SCSEP	MWE	2020
REO	N/A	N/A
Community Service Block Grant	N/A	N/A
Unemployment Insurance	MABS & MWE	NOTE: UI will move from MABs, a legacy system, to a new modernized BEACON system in 2020.

WIOA Program Data and System Alignment

Although MD Labor, MSDE, DHS, and DHCD report on each individual program to the respective federal oversight agency, Maryland does not currently have an integrated system with all partner programs. MD Labor is therefore currently unable to report data from agencies, like MSDE-DORS and DHS-FIA, which report using their own established systems.

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

DHS is leading discussions with WIOA partners on long-term solutions in the development of prototypes, using multiple technologies to evaluate which best suit the needs of the state. Overall requirements and features are to be defined based on the suggestions from various stakeholders. MD THINK is a cloud-based technology platform to revolutionize Maryland's delivery of human services. MD THINK will eventually integrate data systems from numerous programs and agencies. Currently, these agencies all have their own systems, housing disconnected yet overlapping in information. MD THINK represents the largest Information Technology project in the history of Maryland. This modern "client-centric" integrated platform will eventually provide employees, partner providers, and constituents of Maryland's human services agencies an efficient and effective platform for delivering collaborative services. A web and mobile front end will provide a central place to access any service from any participating agency. MD THINK is being implemented program-by-program.

The WIOA partners intend to replace the multiple, existing systems, shown above, with a new system that will be adaptable across multiple Maryland State agencies. All require a system with similar attributes: a flexible, robust case management platform with safeguarding of Personally Identifiable Information, and a comprehensive, adaptable rules engine.

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

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

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

In the long term, DHS is leading the creation of a long-term solution to sharing information between partners. MD THINK is a cloud-based technology platform to revolutionize Maryland's delivery of human services. MD THINK represents the largest Information Technology project in the history of Maryland. This modern "client-centric" integrated platform will provide employees, partner providers, and constituents of Maryland's human services agencies an efficient and effective platform for delivering collaborative services. A web and mobile front end will provide a central place to access any service from any participating agency. MD THINK is currently under development in phases. Phase I of development involves certain DHS programs and is slated to be complete by fall of 2020. The State anticipates that DHS' partner WIOA programs will be included in a later phase of development.

Until then, in the short term, effective with MD Labor Policy Issuance 2017-10 – *Partner Access to the MWE*, MD Labor has expanded partner access to the MWE system to a read-only level. Expanding partner access to the MWE system to a read-only level requires a team approach, where agencies must triage clients in order to properly enroll them and provide the most appropriate services. Currently, PII, including SSN, disability status, etc., are stored and protected through MWE, where partners can only see information that is pertinent to their work. Additionally, limited read-only confidential UI information can be viewed through the MWE system and must be protected accordingly. MWE is a secure platform to protect the confidentiality of customers. As

access to the MWE is expanded, client protections are central to determining appropriate partner security level. Each partner contact should only be granted access to data, forms, and reports relevant to their programs and those services offered by those programs, but they cannot edit, change, or add data or case notes to the MWE system.

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

The GWDB has established cross-cutting strategic initiatives as an outgrowth of task forces, formulated in previous years. Engagement and support from stakeholders and leaders throughout the business, workforce, education, labor, and nonprofit industries representing Maryland is essential to these initiatives. Two of these strategic initiatives include:

- Cybersecurity and Information Technology (IT), the needs of which cut across industry sectors and
- Interagency Development, helping expose staff and board members to holistic, wraparound services, and to interagency work across multiple State agency partners.

The Cybersecurity and Information Technology strategic initiative includes leaders and experts from businesses, universities, and nonprofits to ensure education and instruction align with employer needs within the Cybersecurity and IT industry. The initiative continuously works to create a pipeline of talent for employers by focusing efforts on engaging students as well as incumbent workers as necessary catalysts to fill these openings.

The GWDB, along with the other WIOA partners, have been in discussions regarding coordinated data collection under the upcoming MD THINK platform. MD THINK is a groundbreaking technology platform that will transform the State's ability to deliver vital human services to constituents. The first program of its kind in the nation, MD THINK will serve more than two million Marylanders through one cloud-based platform. It will integrate the state's health and human services applications, so workforce system partners can more effectively and efficiently deliver multiple services on a unified platform.

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

Interoperability of Maryland's WIOA Management Information Systems

Once integrated, the WIOA partners will be able to effectively use the WIOA management system to assess the progress of participants exiting from core programs and completing postsecondary education or entering into or retaining employment. The modernized WIOA management system will provide a common data infrastructure from which ad hoc and automatically generated reports may be produced. Once established, this system will provide the ability to flexibly analyze and visualize data across the WIOA system, either in a consolidated fashion or using system specific data. Analysts will have the ability to quickly explore data through easily customized visualization

tools. This allows for a drag and drop type interface, which would eliminate the need for hard coding when generating a new report or changing an existing report.

Until then, in order to collect the participant level data that will be aggregated and displayed in USDOL quarterly reports, Maryland will use a standardized individual record file from the MWE for USDOL program participants, called the WIOA PIRL. The PIRL provides a standardized set of data elements, definitions, and reporting instructions that will be used to describe the characteristics, activities, and outcomes of WIOA participants. Maryland will be able to meet USDOL requirements to collect participant information that corresponds with the data elements and descriptions delineated within the PIRL. Once collected, this information will then be aggregated according to the conditions outlined in the WIOA Data Element Specifications, which detail the common data elements and technical specifications necessary for calculation of reporting elements under all the USDOL programs listed in the paragraph below. Once aggregated, Maryland will submit the outcomes of the PIRL data to USDOL, which will be displayed according to the frameworks within the USDOL Performance Scorecard and the WIOA Pay-for-Performance Scorecard. Each program mentioned in the supporting statement will generate a program specific report that mirrors the construct of the USDOL Performance Scorecard.

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

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

The WIOA partners are dedicated to provide their staff with additional training regarding performance reporting to ensure proficiency. Sec. 506(b)(1) of WIOA states that section 116 of WIOA will go into effect at the start of the second full PY after the date WIOA was enacted.

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

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

(B) Assessment of Participants' Post-Program Success.

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

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

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

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

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

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

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

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

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

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

Use of UI Data

Under WIOA, UI wage records will continue to serve as the primary source for all employment related performance measures. To obtain UI Data, WIOA partners must (1) enter into an approved data sharing agreement with DUI, (2) submit and keep current the required confidentiality forms, and (3) recognize access to UI Data pursuant to a data sharing agreement as an in-kind contribution in a Resource Sharing Agreement or provide DUI an annual fee for access to the information. These requirements imposed on WIOA partners are necessary to demonstrate compliance with federal and state UI information confidentiality rules and allow the State to maintain its good standing with USDOL.

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

Fiscal Management and Accountability System

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

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

(D) Privacy Safeguards.

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

Privacy Safeguards

To protect PII, Maryland adheres to USDOL guidance provided in Training and Employment Guidance Letter 39-11, "Guidance on the Handling and Protection of PII." MD Labor's DWDAL issued a policy in spring 2019 on privacy and data protection, outlining the Division's privacy safeguards. All programs under DWDAL must adhere to the policy.

Whenever possible, Maryland will continue to use unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, staff may use a unique identifier to link each individual record back to the SSN. Once the SSN is entered for performance tracking, the unique identifier may be used in place of the SSN for tracking purposes. When SSNs are used for tracking purposes, Maryland requires its WIOA programs to store or display SSNs in a way that is not attributable to any particular individual. For Maryland's WIOA programs using the MWE, the state subsequently uses alternative identifiers, such as state IDs, after SSNs have initially been supplied. When SSNs are used, this information is truncated and encrypted within the MWE. Only WIOA staff with selective privileges can access SSNs. To secure the System Internet communications within the MWE, a Secure Sockets Layer (SSL) is used to encrypt a session between the server and the web user. SSL is a program layer for managing the security of message transmissions in a network. The programming for maintaining data confidentiality is contained in a program layer between an application such as the System and the Internet's Transmission Control Protocol / Internet Protocol (TCP/IP) layers. The "sockets" part of the term refers to the socket method of passing data back and forth between a client and a server program in a network or between program layers in the same computer. SSL uses the public-and-private key encryption system from RSA. A digital certificate is an electronic "credit card" that establishes credentials when carrying out transactions on the web, and is issued by a certification authority. It contains a copy of the certificate holder's public key, which is used for encrypting and decrypting messages and digital signatures, and the digital signature of the certificate-issuing authority. This is used so that a recipient can verify the certificate is real. The following data will always be encrypted when it is accessed by the MWE System:

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

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

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

Due to privacy concerns among Local Areas and MD Labor, Maryland formed a workgroup in 2016 to assess policy related to privacy and to work with the federal oversight agencies, like USDOL, to determine alternative methods of tracking that do not require staff to collect PII. The desired goal is to obtain accurate eligibility documentation while reducing paper case files. Utilization of a module within the MWE allows all eligibility information and supporting documentation to be scanned and uploaded to the MWE eliminating the need for a paper file.

(7) Priority of Service for Veterans.

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

Men and women who have served in the U.S. armed forces or who have been the spouses of service members have made significant sacrifices on behalf of the United States. In recognition of their service, and in accordance with the WIOA, the Jobs for Veterans Act of 2002[4] and the Veterans' Benefits, Healthcare, and Information Technology Act of 2006[5], Maryland is committed to prioritizing services to Veterans and spouses who meet the criteria for "covered persons." Maryland's workforce system must ensure that members of this population have access to services that enable them to qualify for, find, and keep good civilian jobs in occupations with career pathways.

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

[4] Information on the Jobs for Veterans Act of 2002 is available at www.doleta.gov/programs/VETS.
[5] Information on the Veterans' Benefits, Healthcare, and Information Technology Act of 2006 is available at www.congress.gov/bill/109th-congress/senate-bill/3421

Veterans	Spouses of Veterans
Veterans who have served at least one day in the active military, naval, or air service, who were discharged or released from service under any condition other than a condition classified as dishonorable, and who are otherwise eligible for participation in programming are included as covered persons. This definition includes Reserve units and National Guard units activated for Federal Service.[6]	An "eligible spouse" means a spouse of any of the following: a. A spouse of any veteran who died of a service- connected disability; b. A spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days; i. Missing in action; ii. Captured in the line of duty by a hostile force; or iii. Forcibly detained or interned in the line of duty by a foreign government or power. c. A spouse of any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or d. A spouse of any veteran who died while a disability was in existence.

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

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

- First, to veterans and eligible spouses (who also are included in the groups given statutory priority for WIOA adult formula funds). This means that veterans and eligible spouses who also are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds.
- Second, to non-covered persons (individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
- Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
- Fourth, to any other populations identified by the Governor or Local Board for priority.
- Last, to non-covered persons outside the groups given priority under WIOA.

[6] 38 U.S. Code § 4215 - Priority of service for veterans in Department of Labor job training programs - https://www.gpo.gov/fdsys/pkg/USCODE-2008-title38/pdf/USCODE-2008-title38-partIII-chap42-sec4215.pdf; A Protocol for Implementing Priority of Service For Veterans and Eligible Spouses: https://wdr.doleta.gov/directives/attach/TEN/ten2010/ten15-10a1.pdf

** Note: When past income is an eligibility determinant for Federal employment or training programs, any amounts received as military pay or allowances by any person who served on active duty, and certain other specified benefits, must be disregarded for the veteran and for other individuals for whom those amounts would normally be applied in making an eligibility determination. Military earnings are not to be included when calculating income for veterans or transitioning service members for this priority.*

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

Identifying Veteran Status

Each AJC, or other relevant point of entry, should inform covered persons, that by identifying as a Veteran or covered spouse, they are entitled to Priority of Service. One of the responsibilities of the Local Veterans' Employment Representatives (LVERs) are to ensure that signage and detailed sign-in sheets exist at point of entry. The workforce system and affiliate program operators must enable Veterans and eligible spouses to identify themselves as Veterans at the point of entry to the system or program, so that covered persons can take full advantage of Priority of Service.

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

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

Verifying Veteran Status

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

1. Is to immediately undergo eligibility determination and must be registered or enrolled in a program; or,

2. The applicable federal program rules require verification of covered Veteran or eligible spouse status at that time.

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

Implementing Priority of Service

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

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

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

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

Monitoring Compliance with Priority of Service

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

The following will be used to measure compliance:

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

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

1. Will be handled in accord with each program's compliance review procedures; and

2. May lead to imposition of a corrective action plan.

Referral Process for Veterans Determined to Have Significant Barriers to Employment

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

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

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C. 4211(1) and (3); Special disabled and disabled veterans are those:
  - Who are entitled to compensation (or those who would be entitled to compensation, yet are not receiving it due to the receipt of military retired pay) under laws administered by the Secretary of Veterans' Affairs; or
  - Who was discharged or released from active duty because of a service-connected disability;

- Other eligible veterans as defined under 38 U.S.C. 4211(4); Eligible veteran means a person who:
  - Served on active duty for a period of more than 180 days and was discharged with other than a dishonorable discharge;
  - Was discharged or released from active duty because of a service-connected disability;
  - As a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge; or
  - Was discharged or released from active duty by reason of a sole survivorship discharge

- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a) and (b)), as amended;

- A recently-separated service member, as defined in 38 U.S.C. 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;

- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;

- A veteran lacking a high school diploma or equivalent certificate;

- A low-income individual (as defined by WIOA Section 3 (36));

- A veteran between the ages of 18 and 24 years old who possess limited civilian work history;

- A Vietnam-era veteran. Vietnam-era veterans are those for which any part of their active military, naval, or air service was during the Vietnam era (the period beginning February 28, 1961, and ending May 7, 1975, in the case of a veteran who served in the Republic of Vietnam during that period, and the period beginning August 5, 1964, and ending May 7, 1975, in all other cases)

- Eligible Transitioning Service Members, Spouses and Caregivers. In annual appropriations bills since the consolidated Appropriations Act of 2014, Congress authorized JVSG grants to support services described in VPL 07-14 to:
  - Transitioning members of the Armed Forces who have been identified as in need of individualized career services;
  - Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in Military Treatment Facilities (MTFs) or Warrior Transition Units (WTUs); and
  - The spouses or other family caregivers of such wounded, ill, or injured members.

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

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

WIOA System Accessibility for All Marylanders

Maryland's WIOA oversight entities are committed to ensuring that individuals with disabilities have equal access to all WIOA covered programs and activities. The State of Maryland will ensure that subrecipients establish and implement appropriate procedures and processes under the Americans with Disabilities Act (ADA) and Rehabilitation Act -Title IV. The State of Maryland has taken necessary steps to identify compliance under Section 188 of WIOA, which contains provisions identical to those in Section 188 of Workforce Investment Act, as well as 29 CFR Part 38, which is similar to 29 CFR Part 37. Additionally, the state will ensure that all Local Areas comply with provisions that prohibit discrimination against individuals who apply to, participate in, work for, or come into contact with programs and activities that receive financial assistance

from USDOL, United States Department of Education, and the U.S. Department of Health and Human Services. Section 188 of WIOA prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including LEP), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I-financially assisted program or activity. Section 188 also requires that reasonable accommodations be provided to eligible individuals with disabilities. AJCs are expected to meet the needs of their customers by ensuring universal access to their programs and activities for all eligible individuals. Universal access includes performance of the following functions:

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

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

- Section 188 implements the nondiscrimination and equal opportunity provisions of WIOA, which are contained in Section 188 of the statute.
- Section 188 prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including LEP), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I-financially assisted program or activity.
- Section 188 also requires that reasonable accommodations be provided to qualified individuals with disabilities in certain circumstances.

The state expects local providers to acknowledge in local plans and/or policies that they understand that, while Section 188 regulations ensure equal opportunity for individuals with disabilities, 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 disability;
- Title II of the ADA, which prohibits state and local governments from discriminating on the basis of disability;
- Section 427 of the General Education Provisions Act; and
- Maryland Anti-Discrimination laws.

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

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

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

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

Additionally, to ensure staff are properly trained on topics related to EO, Maryland held its 3rd WIOA Convening in the winter of 2017 to unpack the WIOA Section 188 Nondiscrimination and subsequent guidance, overviewing topics such as the State Nondiscrimination Plan and Language Access Plan, compliance deadlines, *Benchmarks of Success*, WIOA target populations and priority of service, and cultural competency. In-depth topics included language access training, Equal Opportunity Officer Training, disability accessibility, the discrimination complaint process, understanding immigration and eligibility documents, and more. In 2020, OFP will onboard a WIOA Equal Opportunity Specialist who will be dedicated to working towards enhanced accessibility throughout Maryland's WIOA system.

Also, in late 2016, USDOL awarded the DWDAL nearly $2.5 million to implement the state's Disability Employment Initiative (DEI). Maryland's DEI has a grant period spanning October 1, 2016 through April 1, 2020. Employing the career pathways model, Maryland's DEI will meet the USDOL's goals and aims to equip individuals with disabilities with the skills, competencies, and credentials necessary to help them obtain in-demand jobs, increase earnings, and advance their careers. When designing Maryland's DEI, the State had the following goals in mind: (1) increase the number of individuals with disabilities entering competitive integrated employment via services within AJCs; (2) improve accessibility of the AJCs involved; increase the competency level and number of skilled staff in the AJCs to serve individuals with significant disabilities; (3)

develop career pathways systems and programs to equip individuals with disabilities with skills, competencies, and credentials necessary to help them be competitive in the workforce; and, (4) create a more robust workforce system to serve individuals with disabilities within the state of Maryland, by addressing the needs of businesses.

Maryland's Disability Employment Initiative

Maryland's DEI grant is administered locally in Anne Arundel and Montgomery counties by the Anne Arundel Workforce Development Corporation and WorkSource Montgomery. Anne Arundel Workforce Development Corporation selected the Glen Burnie AJC as its pilot site and WorkSource Montgomery has selected the Wheaton AJC as its pilot site. Through funding made possible by the grant, these centers will be fully accessible for individuals with disabilities.

To increase the workforce system's capacity to effectively serve individuals with disabilities, Maryland's DEI provides for an array of professional development opportunities. Throughout the DEI grant period, Local Area staff will receive professional development and technical assistance opportunities, including the Association of Community Rehabilitation Educators (ACRE) Competency-based Certificate Training, which places an emphasis on Customized Employment.

Customized Employment allows for an individualized approach to supporting jobseekers and employers in meeting their goals and typically involves four components: (1) discovery and assessment; (2) job search planning; (3) job development and negotiation; and (4) post-employment support. Depending on the needs of the jobseeker, accommodations or recognition of jobseeker limitations may take place at any point in the training process.

In addition, to ensure the DEI's success in Maryland, MD Labor has: (1) hired a DEI program manager for the State; (2) established a statewide Cohesive Resource Committee; (3) encouraged Anne Arundel and Montgomery counties to establish local Cohesive Resource Committees; (4) made resources available locally to hire Disability Resource Coordinators in Anne Arundel and Montgomery counties; and, (5) encouraged the pilot counties to support individuals through an Integrated Resource Team approach.

Monitoring of Sites

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

- EO Law Posters are in plain sight, centrally located, in needed languages and provide state and local EO Officer contact information;
- WIOA, Veteran, ITA, and OJT Literature are present;
- EO tagline is inserted and correct;

- TTY/TDD or Relay Service number is provided where phone numbers are listed;
- Site is accessible, i.e. ADA compliant;
- Disability entrance signage is present;
- Entrance and parking lot are accessible; and
- There are both Accessible stations and Assistive Technology.

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

DWDAL anticipates transferring the responsibility of monitoring for Equal Opportunity and accessibility from the DWDAL Office of Monitoring and Compliance to the new OFP WIOA Equal Opportunity Specialist. The Office of Monitoring and Compliance will continue to monitor DWDAL programming for non-Equal Opportunity related areas.

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

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

(9) Addressing the Accessibility of the AJC Delivery System for Individuals who are English Language Learners.

Describe how the AJC delivery system (including AJC center operators and the AJC delivery system partners) will ensure that each AJC center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

Background

According to January 2020 MD Labor data, English language learners represent approximately 56 percent of the State's WIOA Title II adult education population. As of the 2010 U.S. Census, Maryland is home to 5,773,552 residents and of the statewide population age five or older, 18 percent report that they speak a language other than English at home and 6.7 percent report speaking English less than "very well." And, according to the 2010 Census, of the 743,810 foreign born persons in Maryland age five or older, 77.4 percent speak a language other than English and 38.6 percent report speaking English less than "very well." These populations provide substantial contributions to Maryland's economy every day. In turn, Maryland's workforce system must strive to tailor services for this population as they obtain literacy and high school equivalency, training, and employment services.

Labor takes seriously its commitment to being in compliance with equal opportunity and nondiscrimination matters. First, Maryland's Nondiscrimination Plan fulfills the requirements of WIOA Section 188 and 29 CFR Part 38. The plan states that it is the policy of the State of Maryland to not discriminate against any individuals in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including LEP), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I-financially assisted program or activity.

Second, Labor's OFP is responsible for overall compliance regarding equal opportunity and nondiscrimination matters. The OFP provides technical assistance and professional development opportunities. All Local Areas have designated an Equal Opportunity Officer to ensure accessibility of the Local Areas' AJCs. In addition to the equal opportunity and accommodations training conducted by that office, Maryland is dedicated to ensuring that frontline staff is trained to meet the needs of Maryland's English language learners through professional development opportunities.

Third, the presence of language access plans displays the agency's commitment to ensuring services for English Language learners. The OFP issued an LEP Plan to provide general guidance to Labor's Divisions and Commissions to ensure meaningful access to English language learners. In addition, DWDAL and DUI jointly developed a Language Access Plan (LAP) in 2018 (it will be updated and reissued in 2020). The LAP identifies how the DWDAL and DUI, along with the statewide network of AJCs and Title II adult education sites, will work collaboratively to ensure workforce system access for LEP individuals.

Language Access Services

The LAP is established pursuant to and in accordance with, state Government Article, §§10-1101, Annotated Code of Maryland: "The General Assembly finds that the inability to speak, understand, or read the English language is a barrier that prevents access to public services provided by state departments, agencies, and programs, and that the public services available through these entities are essential to the welfare of Maryland residents. It is the policy of the state that state departments, agencies, and programs shall provide equal access to public services for individuals with LEP."

The provision of equal access to public services details both spoken interpretation and written translation services. There are two types of spoken interpretation services: in-person and telephonic. In-person interpretation is a real-time, face-to-face oral interpretation service option that allows customers to receive information in their preferred language with incorporation of "cultural and syntactical context." The State of Maryland contracts with Ad-Astra, Inc. (Ad-Astra) to provide this service. Telephonic interpretation also allows customers to receive information in their preferred language with incorporation of cultural and syntactical context through the telephone, where the interpreter is able to relay the messages of a staff person. The State of Maryland contracts with Language Line Solutions (Language Line) to provide this service. Based on Maryland code, State agencies and grantees must provide face-to-face, in-house oral language service if contact between the agency and individuals with LEP is on a weekly or more frequent basis. In the LAP, Labor provides guidance on implementing this code on a state-level and local-level.

To ensure speakers of other language are aware of available interpretation language services at the state's AJCs, a variety of resources are used. AJCs display "I Speak" posters near the point of entry, listing 38 identifiable languages that customers can point to so staff can arrange appropriate interpretation services. AJCs may also display multilingual brochures specifically designed for the LEP population as well as Equal Opportunity posters in languages other than English.

Maryland Code also stipulates requirements for written translation services. Vital documents must be translated into any language spoken by any LEP population that constitutes three percent of the overall population within the geographic area. According to Labor's OFP, a "vital document" is one that conveys information that critically affects the program recipient to make decisions about his or her participation in an activity. Documents that require a signature and mention the continuation or termination of a benefit are considered "vital." This may include web-based information. The State contracts with Ad-Astra to provide written translation services in order to ensure material is accessible to LEP individuals. All state vendor contracts may be utilized by Local Areas.

Maryland also uses "Babel Notices" to communicate the significance of vital information to English language learners and LEP individuals. Local Areas should include Babel Notices pursuant to the three percent population stipulation in state law. Census data should be used to determine which languages to include and will be reviewed as new statistics become available. Data in the MWE regarding LEP status and preferred language allows Local Areas to develop a baseline of what populations use and require linguistic services. Local Areas are able to alter their Babel Notices according to the languages most relevant to their areas.

DWDAL and DUI publications available in Spanish include the Pocket Resume for Job Interviews, Services for Migrant and Seasonal Farm Workers, GED Testing, and the publication "What you need to know about UI in Maryland." Additional resources are continually reviewed for content and ease of translation. Because of the significant number of Spanish speaking claimants seeking services, the College Park UI Claim Center employs Spanish-speaking staff that review claims over the phone for claimants from the entire state. The Division's Spanish speaking personnel also assist with employer inquires when necessary.

DORS currently has its website and written materials available in five non-English languages, including Chinese, French, Korean, Spanish, and Vietnamese. These languages were selected based on Census data and customer requests. Similarly, DHS has forms and outreach materials available in Spanish and English as well as FIA forms to apply for assistance available in Amharic, Arabic, Burmese, Chinese, Farsi, French, Korean, Nepalese, Russian, TIG, Traditional Chinese, and Vietnamese. Concerning DHS' LDSS offices, preferred language of customers is recorded in the client database system. This information is utilized to translate documents before sending them out to customers. Multilingual pay, a program for increased compensation for staff fluent in more than one language and who directly with customers, acts as an incentive program for LDSS staff.

Using a translation application, Labor's website can be translated into more than 100 languages. The MWE is available in 20 languages. These languages were selected based on Census data and in adherence to State statute. DWDAL also created documents listing multilingual DWDAL staff and Local Area AJC staff for internal reference.

Other Initiatives

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

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

Additionally, Maryland seeks to enhance services to and remove barriers for English language learners through several grant and technical assistance opportunities. First, Maryland was chosen as one of eight U.S. localities to receive customized technical assistance from WES Global Talent Bridge to advance its skilled immigrant integration efforts. Each of the eight pilot communities received 12 hours of coaching and advising provided by WES Global Talent Bridge; 12 hours of additional customized technical assistance from national experts; and four interactive web-based training sessions with WES Global Talent Bridge and other national partners on topics related to immigrant professional integration. Additionally, Maryland participated in two in-person, peer-learning convenings as part of this project: one in Syracuse, New York and one in Toronto, Canada. As part of the pilot group, each community participated in monthly calls with WES Global Talent Bridge and other participating localities to share ideas and provide updates on the progress of strategic efforts. From participating in this project, the Task Force created a guide for foreign-trained engineers seeking to re-enter the engineering profession in Maryland as well as honed strategies for employer engagement.

Second, MD Labor participated in the National Occupational Licensing Learning Consortium, a peer-learning consortium focused on occupational licensing policies. This selective group worked on understanding ways to remove barriers to labor market entry and improve professional licensing portability and reciprocity. Member states identified areas within their individual policies that may impede entry for populations most burdened by those policies as well as potential solutions to reduce related barriers. These populations include skilled immigrants, people with criminal records, active duty military, veterans and their spouses, and unemployed and dislocated workers. From participation in this consortium, several changes have been made that reduce language-related licensing barriers for the LEP population for the barber, cosmetology, plumbing, and HVAC professions. LEP individuals seeking a barber or cosmetology license are now able to utilize language interpreters for theory exams and those seeking a plumbing or HVAC license are now able to use a translation dictionary for exams.

Through policy issuances and monitoring, the state workforce system will ensure that the needs of English language learners will be met.

IV. COORDINATION WITH STATE PLAN PROGRAMS

Benchmarks of Success

The *Benchmarks of Success for Maryland's Workforce System* will be a framework used by Maryland workforce development system partners to build system effectiveness, support transparency about progress, and help State and local WIOA partners align resources and strategies with its intentions.

MD Labor, DHCD, DHS, DORS and all other programs engaged in Maryland's Combined Plan work together to implement the *Benchmarks of Success*. The Benchmarks reflect a shared and coordinated vision of excellence among the State's workforce system partners and provide a strategic tool for continuous improvement. As Maryland seeks to strengthen and enhance its workforce system through implementation of WIOA, success requires a commitment to innovation, collaboration, and readiness to take a true systems approach.

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

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

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

Maryland's WIOA Alignment Group

The WIOA Alignment Group meets monthly and is the main coordinating body under Maryland's Combined State Plan. The Alignment Group includes leadership from the key programs represented in the Maryland State Plan. At a minimum, the Alignment Group will be comprised of the following:

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

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS).

The Unified or Combined State Plan must include assurances that:

X	1. The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;
X	2. The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;
X	3. The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;
X	4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;
X	5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;
X	6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);
X	7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;
X	8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;

X	9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;
X	10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);
X	11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and
X	12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B.

(1) Regions and Local Areas.

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

Maryland's Planning Regions

Regional planning is a requirement under Section 106 of WIOA. The Act requires the State to identify planning regions as a part of the process for developing the State plan. Maryland's Local Areas have historically entered into agreements wherein they developed regions and produced plans to regionally target various industry sectors. Maryland's workforce areas include:

- Anne Arundel County;
- Baltimore City;
- Baltimore County;
- Frederick County;
- Lower Shore (made up of Wicomico, Somerset, and Worcester Counties);
- Mid-Maryland (made up of Carroll and Howard Counties);
- Montgomery County;
- Prince George's County;
- Southern Maryland (made up of Charles, Calvert, and St. Mary's Counties);
- Susquehanna (made up of Harford and Cecil Counties);
- Upper Shore (made up of Kent, Queen Anne's, Talbot, Caroline, and Dorchester Counties); and
- Western Maryland (made up of Garrett, Allegany, and Washington Counties).

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

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

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

Process for Determining Regions

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

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

In October 2015, the WIOA workgroup on Labor Market Information distributed, for public review, a list of draft variables that the State proposed to use for delineating regions. The MD Labor led workgroup proposed the use of a similarity index that would include Local Areas with similar or shared labor markets, shared common economic development areas, and adequate possession of federal and non-federal resources to ensure that a proposed region would have appropriate education and training institutions. The State considered the following additional variables:

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

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

Functions of the Planning Regions

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

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

Subsequent Designation of Regions

Upon request of the chief elected officials from the Local Areas affected, or every two years beginning July 1, 2016, the State will review the current configuration of regions. Should it be determined that the regions no longer meet the needs of the State's workforce system, the State will undertake a reconfiguration of the regions in coordination with Maryland's Local Boards and chief elected officials.

Designation and Re-Designation of Local Areas

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

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

> Workforce Investment Act of 1998) due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration.

Upon receipt of a request from a chief elected official for a particular Local Area to re-designate the Local Area, the Maryland MD Labor will conduct a review of the Local Area's performance and fiscal integrity to ensure that it both performed successfully and sustained fiscal integrity. Upon conclusion of the same, the Secretary of the MD Labor will recommend to the Governor whether Local Area should be re-designated.

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

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

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

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

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

Impasse Step 1: GWDB Proposes Resolution

The GWDB Executive Director is responsible for notifying the GWDB Chair that an impasse has been declared. At this point, the GWDB Executive Director and the MD Labor -DWDAL Assistant

Secretary must provide the GWDB Chair with relevant materials for review, including but not limited to: 1. the completed Dispute Resolution Form; and 2. MD Labor -DWDAL Assistant Secretary's proposed resolution. In turn, the GWDB Chair is responsible for selecting three GWDB members to serve as members of an Impasse Review Team. The Impasse Review Team must investigate the dispute to obtain additional information or to clarify the facts presented. Within 14 business days of the declaration of impasse, the Impasse Review Team must meet to discuss the dispute with all appropriate state and local partners. After meeting, within seven business days, the Impasse Review Team must provide a written response and dated summary of the proposed resolution to all appropriate Parties. The Local Board Chair (or designee) then must contact the petitioner, the appropriate state and local partners (when a local partner is not the petitioner) and the Local Board (when the Board is not the petitioner) to verify that all appropriate Parties are in agreement with the proposed resolution. The state will consider the dispute to be settled when all partners are in agreement. If the dispute is not resolved within ten business days of receipt of the GWDB Impasse Review Team's written response, then Step 2 of the impasse procedure must be followed.

Impasse Step 2: Governor Resolves Dispute

After an impasse has gone through Step 1 and remains unresolved, then it is the responsibility of the GWDB Chair to inform the Governor of the impasse. The Chair must provide the Governor with relevant materials for review, including but not limited to: 1. the completed Dispute Resolution Form; 2. MD Labor -DWDAL Assistant Secretary's proposed resolution; and 3. The GWDB Impasse Review Team's proposed resolution. Upon review, the Governor will determine how the impasse shall be resolved. The Local Board Chair will ensure that all partners are aware of the Governor's decision. In accordance with WIOA, the impasse decision made by the Governor shall be applicable to the Local Area for that PY and for each subsequent PY for which partners fail to reach such agreement. WIOA Final Rules specify that if the state cannot assist the Local Board in resolving the impasse, the Governor or the GWDB must report the failure to the U.S. Secretary of Labor and to the head of any other federal agency with responsibility for oversight of a partner's program.

Appeal of Infrastructure Funding Determinations

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

(2) Statewide Activities.

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

The State's WIOA Alignment Group, which is comprised of leadership representing all of the workforce system partners, meets on a monthly basis. The role of the WIOA Alignment Group is both strategic and tactical: it considers system-level opportunities for advancing the integration and cohesion of the State's workforce system and develops system-level solutions. The WIOA Alignment Group has led the development of two key policies to promote interagency service integration. Additionally, the WIOA Alignment Group has also created a brand-new Chief Learning Officer (CLO) position to establish and build system-wide competencies through a systemic approach to professional development.

The first of the two referenced policies, Partner Access to the Maryland Workforce Exchange (MWE), was issued to provide opportunities for partner agencies to access information on the MWE, MD Labor's statewide performance and case-management data system which also offers a wide range of services to jobseekers and businesses. Extending MWE access to partners allows staff to view information on shared customers and deliver more streamlined, targeted services more quickly. The policy explains the process partner agencies must follow to gain access to the MWE system, the responsibilities of all partners in sharing MWE access, and requirements for MWE training.

The second of the two referenced policies, Performance Goals for Maryland's Workforce System – Program Years 2018 & 2019, provides information on the primary indicators of performance for all of the partner programs. This was deemed to be an essential step in helping partner staff working in different programs understand the range of performance metrics collected across the workforce system, as a whole.

The newly-created CLO position will provide a unique opportunity for partner programs to share professional development expertise and resources that previously dwelt in silos. The CLO will work with an advisory board to establish a professional development curriculum designed to equip workforce staff across partner programs with system-level competencies. To ensure the existing trainings available through partner agencies are fully leveraged and effectively coordinated, the CLO will conduct a comprehensive professional development program inventory. The CLO will monitor the landscape of policies across partner programs and facilitate professional development and technical assistance to assist partner programs in consistently implementing programming according to State and federal rules and requirements.

(B) Describe how the state intends to use Governor's set aside funding.

Describe how the state will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers.

Governor Hogan's WIOA Set Aside Funding

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

Rapid Response and Layoff Aversion in Maryland

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

As noted in MD Labor's PI 2018-05 *Rapid Response*, for each Rapid Response event, it is the responsibility of the local Rapid Response team's MD Labor Regional Business Solutions Consultant to take the lead in ensuring all relevant parties remain informed throughout the process. The local MD Labor's Regional Business Solutions Consultant may delegate tasks to any member of the local Rapid Response team so long as all requirements contained within Maryland's Rapid Response policy are met and Rapid Response is effectively delivered.

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

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

- What approach should be taken for the initial business consultation?

- Who specifically should participate in the initial business consultation from the local Rapid Response Team and in what capacity?

WARN Protocols

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

Non-WARN Protocols

In the absence of a WARN, a business may contact any member of the Rapid Response team. For example, the business may contact the Local Area directly if it has an existing relationship or it may contact the DUI to ask specific UI questions. It is the responsibility of the individual who has been contacted to ensure coordination and information sharing between the Rapid Response team occurs timely. In the same way that DWDAL must coordinate with the Local Area(s), DUI, and other stakeholders in WARN situations, the Local Area(s) must coordinate with DWDAL and keep DWDAL well-informed of its anticipated actions in non-WARN situations, as it will be included in reporting to the USDOL.

Initial Business Consultation (Employer Focused)

The initial business consultation is an opportunity for designated members of the local Rapid Response team to meet with the business to understand employer needs[7] and provide information regarding the benefits of moving forward with offering an employee-focused Rapid Response Information Session.

In the initial business consultation, the local Rapid Response team should make available to employers:

- Labor market and retraining information;
- On-site UI bulk claim registration;
- Job placement services;
- Job seeking information;
- Referral to retraining opportunities; and
- Registration of federal trade readjustment services.

The primary goals of the consultation are to: (1) support the business in meeting its needs; and (2) secure the employer's commitment to offer an Information Session geared towards employees. Staff should arrange for initial business consultations on company time at the work site, when

[7] Including the possibility of Trade impact.

appropriate. To gain employer participation and support, the Rapid Response team shall describe the benefits of holding an employee focused information session.

The secondary goal is to obtain information about the impacted workers, so additional services can be planned and implemented appropriately. The Rapid Response team should encourage the employer to provide the following information concerning the affected employees prior to the employee focused Information Session, either by completing the template Impacted Worker Information Form or through other means. Information gained in the initial business consultation would ideally include:

- Salary range for each affected employee;
- Average years of employment;
- Gender and age breakdown;
- Retirees;
- Retirement, pension or severance packages;
- Whether job transfer will be available;
- Educational levels;
- Commuter patterns;
- Literacy issues;
- Whether there is a large English Language Learners population;
- Whether job skills are unique to the employer;
- Whether there is a large number of older workers[8]; and
- Whether the company is utilizing an outplacement service for employees.

Prior to an employee-focused Rapid Response event, the designated Rapid Response team should also encourage the business to solicit resumes from affected employees. Staff should gather information concerning the skills and abilities of impacted workers to be used for outreach with local businesses. Staff should use the information learned during a consultation to inform future outreach opportunities and to provide information on business needs.

Information Session (Employee Focused)

The Information Session is an opportunity for designated members of the Rapid Response team to meet with the impacted workers to:

- Advise the dislocated workers on the transition services that are available via the AJCs and workforce system;
- Explain the basics of the UI benefit system;
- Provide assistance with planning for reemployment services to the labor force;
- Provide assistance with planning for and implementing an on-site displaced worker assistance center;
- Provide financial resources, as available, to assist with a wide range of employment and training services; and

[8] Defined as ages 55+ in accordance with WIOA Section 3(39).

- Offer informational sessions to help reduce worker anxiety and minimize negative impact on the business.

The DUI's involvement will vary based on the size of the dislocation event and staff capacity. For dislocation events impacting 25+ employees, DUI staff must have the capacity to actively participate in the employee-focused information sessions. For smaller dislocation events, the DUI staff will participate as capacity allows.

During smaller dislocation events where DUI in-person participation is not possible, the Regional Business Solution Consultant from the local Rapid Response team should relay UI information through a standard PowerPoint and provide handouts and DUI contact information, as time permits. If not enough time is permitted to cover any/all UI information, the local Rapid Response team must instead verbally provide DUI's contact information along with handouts of the PowerPoint presentation and other relevant materials.

At the conclusion of the Rapid Response event(s), the Regional Business Solutions Consultant (or designee) should complete the Rapid Response Summary Form and provide the summary to the local Rapid Response Team.

Layoff Aversion and Rapid Response

Business Service Team members assist eligible businesses with layoff aversion and/or Rapid Response along any given point of a business' lifecycle.

The Business Services Team offers an array of initiatives and strategies that work towards job creation and layoff aversion. As defined by USDOL, layoff aversion is:

- When a worker's job is saved with an existing employer that is at risk of downsizing or closing; or,
- When a worker at risk of dislocation transitions to a new job, with the same employer or a different employer, and experiences no or a minimal break in employment.

Through on-going engagement with businesses, field representatives will establish relationships with employers and obtain basic knowledge regarding the company, their needs and processes as well as their well-being. If an employer contacts a field representative and advises them they are struggling, or if the representative suspects difficulties or obtains information suggesting trouble via news articles, current Labor Market Information or other sources, arrangements can be made to work with the employer to take a pro-active approach.

Field representatives can assist employers with strategies such as: providing assistance with incumbent worker training or other worker upskilling requirements; funding feasibility studies; connecting companies to business loan programs or other resources; establishing links to economic development activities and assistance; succession planning; proactively identifying opportunities for potential economic transition into other growing industry sectors; cost reduction; process improvement; and connecting businesses to qualified workers.

Other Uses of Governor Set Aside Funds

Innovation requires investment. Since the initial drafting of the State Plan, the WIOA partners have dedicated their efforts to providing funding for projects and interventions with the ultimate goal of systems change. As such, the WIOA Alignment Group discussed, in 2017, various proposals that would provide seed funding for Local Areas to innovate and strengthen local partnerships.

Career Pathways and Co-Enrollment Demonstration Projects

Historically, co-enrollment between Title I WIOA Adult, Dislocated Worker and Youth programs and Title II Adult Education and Family Literacy programs has been low. As providing career pathways for adult learners is a priority within WIOA and the State Plan, Maryland announced in November 2017 a $1 million investment in Set Aside Funding for the development of career pathway demonstration projects. In 2019, Maryland invested another $0.5 investment into this initiative.

While Maryland has had success in developing career pathway models through MI-BEST and ACE, these programs have ended. In response to the solicitation, Local Areas were awarded up to $250,000 to utilize the career pathway model in developing a program targeting adult learners. Local Areas were provided a menu of options that could be employed:

(1) RAs and pre-apprenticeships,
(2) Integrated Education and Training,
(3) Integrated English Literacy and Civics Education,
(4) English Language Acquisition,
(5) Out-of-School Youth Pathways,
(6) Distance Learning,
(7) Transition Specialist Support, and
(8) Bridge programming

The Annie E. Casey Foundation provided technical assistance for Local Areas on the subject of career pathways upon the release of the grant. The goal of this funding opportunity is to strengthen relationships and co-enrollment between Title I and Title II entities within a Local Area. The Department awarded three rounds of funding in 2018 and 2019 to seven grantees.

Reentry Navigators

The AJC at Mondawmin Mall is currently the only designated reentry center in the State. This is based on need and the premise that many ex-offenders have historically returned to Baltimore City upon their release. At the same time, correctional education programs are offered throughout the state at various institutions. Before release, inmates take part in Employment Readiness Workshops designed to make them aware of the AJCs, help with resume building, etc. However, there is no systematic approach to referring those returning to communities to the AJCs, or to area employers who would hire ex-offenders.

To address this need, MD Labor is using WIOA Set Aside Funding to hire Reentry Navigators who can serve newly returning citizens throughout the State. Reentry Navigators interface with inmates in correctional education programs (both academic and occupational) and continue to serve these individuals post-release through local AJC. Navigators also interact with businesses who hire ex-offenders. These contractual positions report directly to the Labor Exchange Administrator for the Local Area.

Other Potential Interventions and Projects

The WIOA partners will continue to find ways to invest in the partnerships that continue to form as a result of Maryland's implementation of the federal Act. The State is currently exploring ways, for instance, to incentivize connections between TANF/TCA and WIOA partners and 2Gen service delivery approaches. The State has also been in discussion with new plan partners to find ways to implement workforce interventions for homeless individuals. These potential interventions also align with the State's *Benchmarks for Success.*

(C) In addition, describe the state policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

For Disaster Planning, USDOL recommends that states use Rapid Response funds to plan for disaster response before a disaster strikes. In keeping with that recommendation, MD Labor has developed a plan and taken initial preparation and coordination steps to strive for strong disaster preparedness. In the event of a disaster, MD Labor will use Rapid Response funds to support the following activities:

- Devise prospective strategies to provide assistance to Local Areas experiencing disasters,
- Identify strategies for aversion of layoffs,
- Ensure mechanisms for regular exchange of information relating to potential dislocations are in place,
- Collect and analyze data and information for a number of purposes, and
- Hold disaster drills.

In the event of a natural disaster, mass layoff, or other emergency, MD Labor's Secretary will work closely with the Governor and other cabinet-level staff to execute the appropriate actions in a timely manner through the Department's position on the Maryland Emergency Management Agency (FEMA) Board. The Secretary, in turn, will communicate with appropriate staff, including the Rapid Response team, to ensure the state fulfills its obligation to deliver the appropriate services and transitions workers to new employment as quickly as possible. The Director of the Department's Office of General Services serves as the point person for the Maryland Emergency Management Agency (MEMA). The Director takes part in daily conference calls throughout the immediate aftermath of the emergency, and interfaces with FEMA, MEMA and other state agencies to coordinate the appropriate response. That information, in turn, is provided to senior staff of the Department.

In response to multiple historic flooding in Ellicott City, Maryland, Governor Hogan requested that all cabinet secretaries worked to find ways to provide services to those affected. In turn, the

Secretary worked with all senior leaders to determine the services that could be offered by the Department. The DWDAL and the DUI worked closely together to ensure that affected businesses and employees had access to technology and dedicated staff to ensure that unemployment benefits were filed and that reemployment efforts occurred immediately. The DWDAL, in turn, worked closely with staff from the Local Area to ensure that job fairs and listings were widely distributed utilizing social media and agency listservs.

Rapid Response teams are expected to be flexible and responsive. Therefore, it is appropriate that that Rapid Response teams play a key role in disaster response in partnership with other internal and external government, nonprofit, and private agencies.

If necessary, Maryland will be able to access these funds for the following activities:

- Purchase and deployment of mobile units for service delivery in disaster areas;
- Support for organizing physical locations for disaster relief centers;
- Assist individuals with applying for UI (and Disaster Unemployment Assistance);
- Support sharing information on services available, including temporary jobs through National Dislocated Worker Grants;
- Hiring staff to support range of needs of impacted individuals, including counselors; and
- Job search assistance.

The DSU, in partnership with Business Services Team, will continue to work to ensure that Maryland businesses consider the importance of having an emergency plan within their own organization as a part of the Maryland Business Services Team's outreach efforts. Staff will offer assistance in the development of their personal disaster plan, according to their projected needs.

(D) Describe how the state provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).)

This description must include how the state disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the state will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

The federal government provides additional services to workers whose jobs are lost, or hours greatly reduced, due to foreign trade or shifts in production out of the United States. The Trade Act program is administered, staffed, and implemented by DWDAL and DUI, alongside the state's Local Areas. While not all job loss due to foreign competition meets the requirements of the Trade Act, the Rapid Response team will work with businesses to provide information on Trade Adjustment Assistance (TAA) and the benefits workers can receive if a business is certified as trade-affected. A business, union, the Rapid Response team, or the workers themselves can file a trade petition with the USDOL.

Rapid Response activities are offered to all worker groups notified of a layoff when the DSU receives a WARN or when notified of potential layoffs. The Rapid Response Team or Business Solutions Representative works with businesses to schedule Rapid Response information sessions for impacted workers. During these sessions, workers are informed of the various services offered by the local AJC and the UI program. When it is determined that a potential Trade impact exists, workers are informed of the Trade program benefits and options available. These individuals may receive services through their local AJC, as appropriate, prior to their certification of eligibility to apply for benefits and services under the Trade Act programs. Rapid Response funds will be utilized to provide layoff aversion activities.

These activities include recruitment events to create business connections, to support Local Area initiatives to re-train and to provide supportive services. The DSU reviews WARN notices and works with businesses to determine if a petition can be filed as early as possible to speed the process for Trade approval. If a worker has been dislocated and is waiting for TAA eligibility determination, that person can receive career services at the local center. Once a petition is approved, DSU staff notify impacted workers of the additional benefits available under Trade and how to apply. Rapid Response funds are utilized to provide assistance to Local Areas in situations where the layoff event results and a need beyond the availability of local resources, including TAA assistance. Local Boards may request additional Rapid Response funds as needed to supplement other funding to serve impacted workers that may not seek assistance under Trade.

TAA, offered at no cost to employers, allows impacted workers to access an even wider array of services for which they would not otherwise be eligible. Once the adversely affected workers become certified under the Trade program, DUI is notified and mails out letters to each of the impacted workers of the Trade certified company. The Special Program Unit and the DSU place advertisements in local papers and/or via online publication, announcing that the company has been Trade Certified and providing instructions for next steps.

The DSU sends out packets to the impacted workers on the eligibility list that include a letter notifying them of the TAA certification, dates, times and locations where they can attend a Trade Information Session, and information on Rapid Response services. A Trade informational session (or multiple sessions) is delivered by the DSU Field Representative in coordination with the Trade Readjustment Allowance Coordinator from DUI, and Trade Program case managers local to the impacted workers. All services and benefits for which participants may be eligible based on their approved petition identifier, are presented during these events. Investigations may take several months and are concluded when USDOL makes a Trade Determination.

Irrespective of the USDOL determination, an initial Rapid Response is always offered and arranged whenever possible for workers affected by business closings, regardless of the size of the dislocation, and whether or not a WARN was received. Maryland strives to ensure all workers receive the same services and information consistently and effectively. All impacted workers may still receive services in any one of the AJCs. Once the notice of Trade Certification is received, they may transition over to the Trade Adjustment Assistance Program if they choose to take advantage of the additional services provided to them under their corresponding certification number.

The TAA Program, outlined in PI 2019-11 *Trade Adjustment Assistance*, enables adversely affected workers to prepare for reemployment as quickly as possible by allowing Trade-impacted participants to work individually with a case manager located in one of the statewide AJCs. The case manager will work with the DSU to enroll eligible participants in the Trade Program. Participants will be co-enrolled whenever possible, as co-enrollment allows the individual to receive career services, reemployment services, training, and support services. Funding for both programs is available at each of the AJCs. Individuals eligible for Dislocated Worker Services and TAA Services are provided career services with the same case manager, providing a seamless approach to the development of an Individualized Employment Plan.

Case management begins with an initial assessment of the individual's skills, interests, abilities, and goals. Marketable and transferable skills are identified during this assessment process, as well as matching existing skills to available, suitable employment with local employers. Many times the trade petition is certified well after the assessment process, and because MD Labor has a co-enrollment process, the individual can continue working with the same case manager while being provided services and benefits under both the WIOA Title I Dislocated Worker program and the Trade program.

After the assessment is completed, if it is determined that the individual requires retraining in order to become reemployed in suitable employment, the case manager will continue working with the individual to develop a training plan. Participants must research training programs and requirements. They may access statewide Labor Market Information for this purpose. Training is approved if (1) the proposed training meets the six criteria for approval of training under the Trade Act, and (2) Federal Trade funds are available. The TAA state Merit staff review and make final determinations on retraining plans, ensuring they meet the Federal requirements under the Trade Act. Co-enrollment continues through the end of the retraining program ensuring the needs of the individual are met.

Maryland strives to provide high quality, integrated services that meet customer needs. When assisting trade-impacted individuals, all partners work together to provide accurate and consistent information. Both MD Labor divisions and the case manager working with the individual must collaborate when developing Individualized Employment Plans. The case manager must gather accurate information during the entire training program to provide progress updates and report on benchmarks, and to ensure that the Trade Readjustment Allowance deadlines are met. This is of paramount importance, as the individual must be able to enter and complete the retraining program in the required amount of time with the financial support provided. The DSU and the DUI Special Programs Unit work hand in hand in an effort to provide TAA training and Trade Readjustment Allowance support without interruption and in compliance with Program rules and guidance for the duration of their services.

(b) Adult and Dislocated Worker Programs

(1) Work-based Training Models

If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these

strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

EARN

EARN is a state-funded, competitive workforce program that is industry-led and regional in focus. The program's flexible and innovative design ensures that Maryland's businesses have the talent they need to compete and grow, while providing targeted education and skills training to Maryland jobseekers. EARN is comprised of Strategic Industry Partnerships (SIPs) that represent a variety of industries, including healthcare, manufacturing, construction, and biotechnology.

While traditional workforce programs often look to training entities or higher education to determine training needs and develop curriculum, EARN's innovative model tasks business and industry partners with designing the programs. At a higher level, employers are challenged to look both within and beyond their individual organization, to identify the specific skill needs for their workforce as well as the broader range of skills needed within their industry sector.

Employers and industry partners are encouraged to analyze the diverse evolving needs within their industry, too, such as training needs associated with keeping pace with increasingly sophisticated technology, and the shifting demographics caused by retirements, etc. By anticipating the changing landscape of training needs, curriculum can be designed flexibly to perform over time as an effective workforce solution.

During the development of training, employer and industry partners are consulted to determine which training strategies and techniques will be most effective in training for the skill sets they need in workers. For instance, some employers indicate that in order to truly master certain skills, on-the-job learning experiences, rather than classroom training, or some combination of both, are ideal. Because employers are the experts on what makes a competent employee, they are experienced in identifying the correct training techniques to ensure success of skill formation.
Finally, employers and industry partners are required to participate in training. This occurs in a variety of ways, including teaching specific courses, observing training, and mentoring trainees. This level of participation not only allows employers to ensure the training meets their vision, but also gives employers exposure to potential employment candidates.

Soft skills are frequently rated by EARN employers as being equal in importance with specific occupational or technical skills. To address the soft skills issue, EARN partnerships participate in identifying which soft skills are critical to success in the industry. Soft skills training is implemented in the classroom and modeled in on-the-job work experiences. Some partnerships utilize a simulated work environment throughout training that requires trainees to clock in and out and practice leadership techniques on newer trainees. Essentially, trainees are required to prove that they are able to meet employer standards and that they are adequately prepared for employment.

Because EARN employers and industry partners are involved in training throughout the entire process, they play a key role in quality control. Employers are encouraged to provide feedback on training curriculum and implementation during quarterly partnership meetings throughout their

participation in the program. And because the EARN program is flexible, changes to curriculum and/or training implementation can be made based on employer feedback. Upon the completion of entry-level training, employers will ideally interview successful candidates who have gone through training designed according to their standards.

EARN trainees often have significant barriers to employment, including criminal backgrounds, low levels of literacy, lack of transportation, and disadvantaged backgrounds. Each industry partnership operating an EARN grant must include at least two "diverse partners," with experience in barrier removal. Partnerships targeting underserved groups must focus on the whole person when developing a training plan. An EARN trainee may have a wide array of technical skills and strong soft skills, but without transportation to get to work on time, their retention will not be high. To provide holistic services, partners work individually with trainees to ensure all barriers to employment are removed before entering the workforce, maximizing the odds for success. Examples of barrier removal services provided to EARN trainees include record expungement, bus tokens or a vehicle, providing bridge instruction in math and reading, GED courses and stipends for training.

Since the program began in 2014, EARN has been recognized as a national best practice for its innovation and implementation of sector strategies. In 2015 and 2016, the National Skills Coalition and Urban Institute praised EARN as a leader in industry-led workforce initiatives. In 2017, EARN was highlighted at the National Conference for State Legislatures as a model to be emulated. Additionally, at the request of the National Skills Coalition, EARN staff provided technical assistance to states seeking to emulate this national best practice. In 2018, EARN was named one of the Top 25 programs in Harvard's 2018 Innovations in American Government Award competition, which highlights exemplary models of government innovation.

EARN has received these accolades because the program works. As of October 2019, 5,422 unemployed and underemployed participants completed entry-level training programs. Of those, 4,558 (84 percent) obtained employment. As of October 2019, over 7,400 incumbent workers participated in training, earning a new skill, certification or credential.

EARN, Going Forward

Recognizing the success of the program, Governor Hogan has more than doubled the appropriation for EARN since taking office in 2015. Specifically, $3 million annually has been earmarked in FY 2018, 2019, and 2020 to promote training in Cyber and Information Technology. Additionally, $1 million annually in FY 2018, 2019, and 2020 was allocated for green jobs training. While this funding will sunset in 2020, EARN will receive funding through the Clean Energy Jobs Act (CEJA) beginning in FY 2021. Passed during the 2019 Legislative Session, the CEJA will provide $8 million to MD Labor to support clean energy job development utilizing Pre-Apprenticeships and RAs. Finally, in FY 20, $500,000 was earmarked to benefit employers and residents in and around the State's 149 Opportunity Zones. These key investments by Governor Hogan will allow a larger number of employers to benefit from this industry-driven program, and ensure a more highly-skilled workforce.

By supporting company efforts to update skills for new processes and equipment, there is an opportunity for business services to educate businesses not currently involved with EARN on both entry-level and incumbent worker training efforts, where appropriate. Both MD Labor and Commerce have previously invested in matching grant programs directed to businesses. These investments in Maryland's businesses provided customized training solutions for individual companies with unique or proprietary technical skill requirements.

Much has been learned through the implementation of EARN to date, but there are new ideas to explore and further develop to better serve businesses and jobseekers.

Areas for future exploration:

1. Developing an approach for industry-lead programs to target special populations such as those served by DORS, TANF, etc. - The interplay between industry-led partnerships and provision of services to targeted populations is one that some grantees have undertaken. Maryland lookds forward to learning from their experiences.
2. Bringing programs such as EARN to scale - EARN has been successful and has involved more than 1,000 business and industry partners. However, Maryland has approximately 10,000 businesses. The effort to involve a larger number of businesses in industry-led partnerships, leading to training, and the creation and use of career pathways, is a challenge that EARN can help to address by providing lessons learned.
3. Outline strategies to increase work-based learning experiences such as paid internships and RAs that provide jobseekers with the skills and credentials necessary to secure employment and advance in their jobs with family sustaining wages and benefits by building new sector partnerships and strengthening existing partnerships - EARN will serve as the starting point for this, as some SIPs are providing work-based learning experiences. Maryland look forward to building on lessons learned.
4. Tying business services with EARN - Maryland is committed to creating a business-focused delivery system for workforce needs. In a business-focused system, customized training can be used to meet the special requirements of an employer or group of employers, conducted with a commitment by the employer to employ all individuals upon successful completion of training. Some EARN Partnerships are providing incumbent worker training that meet an employer's specialized needs. Under WIOA, incumbent worker training is an allowable cost, so the partners will review best practices from these training initiatives. The WIOA Partners collaborate with the business to identify eligible program participants and potential sources of training funds.
5. Identification and delivery of industry recognized credentials through industry-led partnerships.

Maryland will further ensure that at least 20 percent of youth formula funds at the local level are used on work-based training activities such as summer jobs, OJT, and apprenticeship for in school and out of school youth. Local Boards must further utilize WIOA funds in support of the business focused system. Local Boards must identify locally defined priority industries, and develop and provide appropriate services based upon input received from employers and other key partners. Apprenticeships, OJT, incumbent worker training, and individual training accounts can be used to provide business-driven training.

(2) Registered Apprenticeships (RAs) Describe how the State will incorporate RAs into its strategy and services.

Governor Hogan's strategic vision for the workforce system is to provide businesses with the skilled workforce they need to compete in the global, regional, and local economies. A bedrock strategy within that vision is the expansion of RAs, a time-honored work-based learning model that offers both Sponsors and job seekers valuable benefits.

The apprenticeship model offers jobseekers access to one-on-one OJT training and related classroom instruction as a path to mastering occupational skills. Most RAs provide opportunities for career advancement that incorporate progressive wage increases aligned with skill increases. Often, RAs also offer healthcare, retirement and fringe benefits, as well.

RAs provide desirable outcomes for employers, as well. The employees produced through RAs are technically up-to-date workers capable of meeting existing workforce needs. Over time, these same employees can become the pipeline of skilled workers employers can feel comfortable promoting from technical to management positions. Besides these inherent benefits, RAs are also associated with reduced employee turnover, quality output, increased productivity and a more cohesive team.

Maryland has made significant progress towards the goal set in the State's original 2016-2020 WIOA Plan to align RAs with the Maryland's workforce system. During the 2016 Legislative Session, the Maryland General Assembly transferred the State's RA program from Maryland's Higher Education Commission to Labor's DWDAL. This legislative enactment, approved unanimously by the Assembly and signed into law by Governor Hogan, has allowed the State to align RAs with workforce development programming. The change also provides key resources for the growth and expansion of RAs.

Apprenticeship Models

RAs combine supervised, structured, OJT and Related Technical Instruction (RTI) to teach Registered Apprentices (apprentices) the skills needed to succeed in a specific occupation. RAs are voluntary, industry-driven programs sponsored by employers, employer associations, or jointly by management and labor. A program sponsor can be an individual employer, groups of employers, or combinations of employers and unions. Each sponsor develops a RA program based on the needs of specific occupations.

Maryland recognizes three types of RAs:

- Time-based RA programs – The most common model, Time-based Programs combine a full-time position requiring a minimum of 2,000 hours of paid OJT with 144 hours of RTI. Time-based programs vary in length from one to five years. Apprentices who satisfy OJT and RTI requirements are certified as Journeypersons in the occupation.
- Competency-based RA programs – The Competency-based RA model was approved under new regulations as a recognized RA model in 2017. In the Competency-based Model,

apprentices progress through a training program, mastering individually identified and measured competencies. Sponsors measure apprentice skill gains through demonstration during work activities. The model enables Sponsors to offer an open entry and exit method, shortening the required time for apprentices who acquire skills more quickly, while extending the training period for apprentices who need more time to meet skill requirements.

- Hybrid RA programs - This model blends elements of time and competency-based models, blending OJT and RTI. Sponsors establish minimum and maximum ranges of hours based on the job requirements, increasing or decreasing a program's length by up.

The RA Process for Jobseekers

Jobseekers interested in exploring RA opportunities are encouraged to research trades to learn more about related occupations. A list of all approved RA sponsors, occupations and other information such as how to directly apply to a sponsor can be found on the Apprenticeship Locator link on the Maryland Apprenticeship and Training Webpage: http://www.dllr.maryland.gov/employment/appr/. Prospective apprentices seeking additional information may also contact the Maryland Apprenticeship and Training Program via email at info@mdapprenticeship.com.

Newly hired apprentices and their Sponsors must complete an Apprentice Agreement, which must be filed with the Maryland Apprenticeship and Training Council. The Apprenticeship Agreement formally classifies the individual as a Registered Apprentice. The Maryland Apprenticeship and Training Council is responsible for registering and regulating the State approved RA programs in Maryland. Apprentices who meet all program requirements receive a certificate of completion and are nationally recognized journeypersons.

The RA Process for Sponsors

Potential Sponsors develop RA programs and apply for registration. The Maryland Apprenticeship and Training Council reviews the "Standards of Apprenticeship" which include:

- An organized, written training plan;
- The terms and conditions of employment;
- Provision of Related Technical Instruction;
- An equal employment opportunity pledge;
- Proper supervision of the apprentice(s).

Maryland will continue to explore opportunities to leverage existing and future discretionary grant opportunities to create and enhance pre-apprenticeship and apprenticeship programs across Maryland and support the creation of new Sponsors.

ETPL

The State is committed to adding all RA programs that indicate interest to the State's ETPL. Per the comprehensive ETPL policy issued by the State in 2017, RAs are automatically included on

Maryland's ETPL if approved via the extensive application and vetting process conducted by Maryland's Apprenticeship and Training Council. Approved RAs will remain on the ETPL as long as the program is registered or until the program Sponsor notifies the Maryland Director of Apprenticeship and Training that it no longer wants to be included on the list. In December 2016, Maryland Labor notified all existing RA program sponsors of their eligibility to be on Maryland's ETPL and notifies each new Sponsor as they are approved by the Council. For inclusion, new Sponsors must complete and submit the form accessible at: www.doit.state.md.us/selectsurvey/RegisteredApprenticeshipProgram.

Through outreach and educational efforts, the ETPL now includes 178 RA programs. Maryland's Apprenticeship and Training Council will continue to work with RA programs to encourage use of the ETPL as an important avenue to access WIOA funding for training and to create pipelines for apprenticeship programs across Maryland.

Connecting Individuals with Disabilities to Apprenticeship Opportunities

The State of Maryland is committed to providing opportunities for individuals with disabilities, and the RA program is no exception. RAs offer adults and young adults including those with disabilities, career pathways that provide earn while you learn opportunities within high-demand occupations. MD Labor and the MSDE's DORS formed the" Apprenticeship Think Tank."

The Think Tank focuses on three areas:

1. Increasing awareness of RA through DORS counselor training; AJC staff training and outreach to DORS counselors with youth in and out of school. Training is offered both statewide and to individual Local Areas.

2. Increasing opportunities for participation in RA programs by directly connecting jobseekers at AJC's and through their DORS counselors to apprenticeship programs, pre apprenticeship training, and other support services to ensure successful participation for individuals with barriers.

3. Increasing participation in RA by developing relationships with current RA Sponsors to support their efforts to hire individuals with disabilities. Both DORS and MD Labor business staff cultivate relationships with new employers and current employers that work with DORS to expand and create RA programs opportunities. Additional work is being done to create and connect individuals with robust pre apprenticeship programs to prepare for apprenticeship.

Youth Apprenticeships

Maryland has also made great strides in establishing youth apprenticeship opportunities. Through the work of the Maryland Youth Apprenticeship Advisory Committee (the "Committee") and the continued push by MD Labor, MSDE, the Maryland Department of Commerce (Commerce), and the local school systems across State, more students, parents, and employers understand the benefits of apprenticeship opportunities for youth.

Youth apprenticeship became available across the State in 2018, at the conclusion of an initial two year, two county pilot program. The Youth Apprenticeship Advisory Board, MD Labor and MSDE worked together to craft the educational framework necessary for local public school systems to design and implement their own youth apprenticeship initiatives. By doing so, the local county school system can submit proposals to MSDE staff members to add the AMP as a career and technology education (CTE) program of study for its students. As a CTE program, local systems can use Perkins Grant funds to support the program. Both departments are hopeful that this approach will facilitate the entry of additional participating school systems.

Expansion of AMP during this period of historically low unemployment is the ideal time for the program to become a proven, sustainable workforce development strategy. In 2018, the groundwork was put in place to expand youth apprenticeship to be available statewide. MD Labor, Commerce, and MSDE's original goal for growing AMP during 2019 was to increase the program from the original two pilot counties to a total of six participating school systems. As a consequence of combined efforts, since the June 2018 unveiling by MSDE of the AMP CTE Program of Study, a total of 15 out of Maryland's 24 local school systems have adopted the model.

As the program has expanded, MD Labor and its partners have taken steps to ensure adaptability by working with employers to identify a variety of training models for greater program flexibility. This includes providing related instruction through any of the following formats: through the local high school, through online programs offered either at the place of employment or at the high school, at the work site of a participating employer, through an industry association, through a Joint Apprenticeship and Training School, or through the community college. The learning component is designed to comport with the needs of the employer to include credentialing and certification.

Maryland also focuses its recruitment of employers from one of MSDE's ten Career Cluster areas, which are based on the high-demand sectors defined by Commerce. Labor, MSDE, and Commerce aligned the program with federal, state, and local resources to ensure that AMP addresses Maryland's workforce and economic development needs.

During the 2017 – 2018 academic year, a total of 30 new eligible employers were approved by the Maryland Apprenticeship and Training Council, raising the number of eligible employers from 14 to 44. This represents nearly 215 percent growth versus the first year of the pilot program. In the 2019-2020 academic year, additional employers have joined since the end of the pilot program, bringing the number of employers as of the printing of this report to 155. More will be added moving forward.

MD Labor and MSDE are committed to growing the program to scale so that as many of Maryland's young people as possible can utilize this innovative career pathway program. Over the next several years, both departments aim to add several local public school systems per academic year. Moreover, the Department will continue to explore ways to use youth apprenticeship as a springboard to post-secondary education and/or job training and career development.

(3) Training Provider Eligibility Procedure. Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including RA programs (WIOA Section 122).

Under WIOA, training is provided to eligible adults, dislocated workers, and youth through a robust ETPL, comprised of entities with capabilities of training individuals to enter quality employment. MD Labor plays a leadership role in ensuring the success of the ETPL in collaboration with the State's 12 Local Boards and other partners, such as the Maryland Higher Education Commission. Maryland's ETPL and the related eligibility procedures were developed to ensure the accountability, quality, and labor market relevance of programs of training services that receive funds through WIOA Title I, Subtitle B.

When developing its ETPL policy, the State had the following goals in mind:

- Ensure that Local Areas have sufficient numbers and a diverse pool of quality providers of in-demand training;
- Create an effective marketplace for the training programs available to WIOA participants with Individual Training Accounts (ITAs);
- Reduce burden on training providers to submit accurate performance information and to guide WIOA participants, in conjunction with staff, in selecting training in the State and Local Areas;
- Prohibit discrimination by training providers in accepting and enrolling WIOA program participants; and
- Provide information on eligible training programs to WIOA participants in a way that helps them make informed decisions, along with staff and within local policy, on how to use their ITAs.

As the State workforce agency, MD Labor has been designated as the entity responsible for defining and carrying out the processes and procedures for determining the eligibility of training providers and programs of training services. MD Labor is specifically responsible for:

- Developing and maintaining the State ETPL and programs as described in 20 CFR 680.450 (initial eligibility), 20 CFR 680.460 (continued eligibility), and 20 CFR 680.490 (performance and cost information reporting requirements);
- Ensuring that programs meet eligibility criteria and performance criteria established by MD Labor;
- Removing programs that do not meet State-established program criteria or performance levels, as described in 680.480(c) and in this policy;
- Taking appropriate enforcement actions against providers that intentionally supply inaccurate information or that substantially violate the requirements of WIOA, as described in 680.480(a) and (b); and
- Disseminating the ETPL, accompanied by performance and cost information related to each program, to the public and the Local Boards throughout the State, as further described in 680.500.

The State's Local Boards are responsible for the following functions:

- Carrying out the policies and procedures assigned to the Local Board;
- Documenting local policies and procedures as related to ETPL, including the handling of Personally Identifiable Information (PII) and the Family Educational Rights and Privacy Act;
- Ensuring the protection of PII and other sensitive information;
- Working with MD Labor to ensure there are sufficient numbers and types of providers of training services, including eligible providers with expertise in assisting individuals with disabilities and adults in need of adult education and literacy activities described under WIOA sec 107(d)(10)(E), serving the Local Area; and
- Ensuring the dissemination and appropriate use of the Maryland ETPL through the local AJC delivery system.

Initial Eligibility

The process of initial eligibility for inclusion on the ETPL is designed to ensure that WIOA participants are using ITAs for high-quality training programs that are likely to result in positive employment outcomes. The eligibility review process provides an opportunity to assess whether training programs meet the quality standards required by Maryland to be included on the ETPL and to ensure customers have access to up-to-date information about program requirements and costs.

MD Labor, in consultation with the GWDB, is charged with establishing eligibility criteria and procedures for the initial eligibility of training providers and programs to receive funds under WIOA Title I, Subtitle B. The State and its 12 Local Boards must work together to ensure sufficient numbers and types of training providers and programs to maximize customer choice while maintaining the quality and integrity of training services. MD Labor will use the information provided in ETPL application to inform customers and stakeholders on: (1) the ETPL website and other related public materials; and (2) the ETPL annual performance report.

The application process for initial ETPL eligibility has two steps: (1) A provider must complete and submit an electronic application: http://www.doit.state.md.us/selectsurvey/initialetpl; and (2) submit required application enclosures.

Applications must include the following key elements in addition to all other information requested in the application:

- Description of partnership with and relevancy for business;
- Description of how the provider's training services align with in-demand industry sectors and occupations, as specified in the WIOA State and/or Local Plan(s);
- At least two quarters of verifiable performance outcome data for initial ETPL consideration except for "new" training programs, which are exempted from this requirement
- Commitment from the program provider to begin collecting and reporting to MD Labor the social security numbers of all individuals engaging in the program (to include all WIOA-funded participants and all non-WIOA funded participants) on an annual basis, as prescribed by MD Labor, once included on the ETPL in order to meet performance

requirements of WIOA Sections 116(b)(2)(A)(i)(I)-(IV), 20 CFR 680.460(g)(1)-(4), and 20 CFR 361.230.

Initial eligibility for a particular program expires after one year of initial approval, and therefore, providers must apply for continued eligibility within 30 days of the application deadline.

Continued Eligibility

The USDOL requires MD Labor to annually report on the performance of providers included on Maryland's ETPL. The information submitted by providers to MD Labor for annual reporting purposes will: assist MD Labor in determining whether a program meets requirements for continued ETPL eligibility; assist WIOA participants and members of the general public in identifying effective training programs and providers; and benefit providers by widely disseminating information about their programs and potentially as a tool to enhance their programs, which in turn would provide a direct benefit to participants.

To complete the annual report, the WIOA Training Program Manager will rely on information from three key places: (1) data submitted annually for reporting purposes by the providers; (2) information provided in the ETPL application (or provided via ETPL program updates from the training provider to the WIOA Training Program Manager); (3) data concerning WIOA participants that are captured in the MWE.

In 2020, MD Labor DWDAL will review the ETPL policy to streamline the application and maximize the effectiveness of the list for all parties. Additionally, Maryland is requesting a waiver related to ETPL data collection in the applicable section of this Combined State Plan.

RA Programs

Under WIOA, RA programs are not subject to the same application and performance information requirements or to a period of initial or continued ETPL eligibility as other training providers. This is because they go through an extensive application and vetting process with the Maryland Apprenticeship and Training Council to become a RA program sponsor. RA program sponsors are, therefore, automatically eligible for inclusion on the state ETPL and will remain on the list as long as the program is registered or until the program sponsor notifies the Maryland Director of Apprenticeship and Training that it no longer wants to be included on Maryland's ETPL.

In December 2016, MD Labor notified all existing RA program sponsors of their eligibility to be on Maryland's ETPL. MD Labor is committed to adding all RA programs that indicate interest to the State's ETPL.

(4) Describe how the state will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.

Maryland's WIOA system can be a pathway to the middle class and a means to maintain and build the skills necessary to remain in the middle class. Maryland is committed to ensuring its target populations are able to access the WIOA system on a priority basis. For the WIOA Title I Adult Program, this means that Local Areas must provide priority for training activities to individuals in the target populations.

Target Populations: Individuals with Barriers to Employment

- Displaced Homemakers
- Eligible MSFWs
- Ex-offenders
- Homeless individuals
- Individuals facing substantial cultural barriers
- Individuals with disabilities, including youth with disabilities
- Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act - TANF
- Individuals who are English language learners
- Individuals who are unemployed, including the long-term unemployed[9]
- Individuals who have low levels of literacy
- Individuals without a High School Diploma
- Low income individuals (including TANF and SNAP recipients)
- Long-term unemployed individuals
- Native Americans, Alaskan Natives, and Native Hawaiians
- Older individuals
- Single parents (including single pregnant women and non-custodial parents)
- Veterans
- Youth who are in or have aged out of the foster care system

Per TEGL 10-09, priority of service for Maryland workforce system customers is as follows:

1. First, to veterans and eligible spouses (who also are included in the groups given statutory priority for WIOA adult formula funds). This means that veterans and eligible spouses who also are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds.

2. Second, to non-covered persons (individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.

3. Third, to veterans and eligible spouses who are not included in WIOA's priority groups.

4. Fourth, to any other populations identified by the Governor or Local Workforce Board for priority.

[9] Per Training and Employment Guidance Letter (TEGL) 31-14, long-term unemployment is unemployment that lasts 27 consecutive weeks.

5. Last, to non-covered persons outside the groups given priority under WIOA.

Note: When past income is an eligibility determinant for Federal employment or training programs, any amounts received as military pay or allowances by any person who served on active duty, and certain other specified benefits, must be disregarded for the veteran and for other individuals for whom those amounts would normally be applied in making an eligibility determination. Military earnings are not to be included when calculating income for veterans or transitioning service members for this priority.

The state will ensure priority of service provisions are appropriately followed and monitored through several means. First, the Local Areas must adhere to these priority provisions and, within their local plans, provide details on how priority shall be given in the Local Area within these parameters. Specifically, Maryland asked its 12 Local Areas to provide "a description of how the Local Board will provide priority of service that conforms to the State Plan. This should include a description of additional local requirements or discretionary priorities, including data to support the need and how the local requirement and/or priority will be documented and implemented for the Adult program."

Second, Maryland has implemented the *Benchmarks of Success* to enhance services for those populations that need them the most.

Finally, Maryland will ensure priority of service is effectively offered through local WIOA Memoranda of Understanding. The GWDB, MD Labor, DHS, and DORS jointly issued a policy on WIOA Memoranda of Understanding and Resource Sharing Agreements with fillable templates. This policy requires that WIOA Memoranda of Understanding contain provisions regarding a number of key components, including priority of service. The policy states that "all partners must certify within the local WIOA Memorandum of Understanding that they will adhere to all statutes, regulations, policies, and plans regarding priority of service, including, but not limited to, priority of service for the WIOA Title I Adult Program and for veterans and their eligible spouses." MD Labor will confirm priority of service during its annual comprehensive monitoring conducted by the Monitoring and Compliance Unit under the DWDAL.

(5) Describe the state's criteria regarding Local Area transfer of funds between the adult and dislocated worker programs.

On behalf of the Governor, MD Labor annually allocates funds for both the WIOA Title I Adult and Dislocated Worker programs. Allocations are made to Local Boards for Local Areas in consultation with the chief local elected officials. As explained in WIOA Section 133, when approved by MD Labor, a Local Board may transfer up to and including 100 percent of a PY and FY allocation for Adult employment and training activities, and up to and including 100 percent of a PY and FY allocation for Dislocated Worker employment and training activities between the two programs.

Transfers may only occur between Adult and Dislocated Worker funds within the same funding phase. For example, PY19 expenditures cannot be transferred to PY18 funding. Local Boards may not transfer funds to or from the Youth program. A Local Board may delegate its authority under

WIOA Section 133 to the director of Local Area or other designated signatory of the Local Area. A delegation can only be accomplished through a resolution of the Local Board, or by a process that is identified in the area's approved Local Plan.

When a Local Board elects to exercise its transfer authority, MD Labor will require that state policy guidance on requesting a transfer, approving a transfer, and reporting a transfer is adhered to. MD Labor has additionally established an appeal process for circumstances where a Local Board wishes to appeal a denial of its transfer request. When approved by OFA, a Local Board may transfer up to and including 100 percent of a PY and FY allocation for Adult employment and training activities, and up to and including 100 percent of a PY and FY allocation for Dislocated Worker employment and training activities between the two programs. A Local Board shall request a transfer by completing the Funding Transfer Request form that includes the following information:

- The number for the grant that expenditures would be transferred from;
- The number for the grant that expenditures would be transferred to;
- The amount of the transfer;
- A justification for the transfer;
- The requested effective date of the transfer;
- An assurance that there are sufficient funds in the budget for required activities for the remainder of the PY and FY; and
- The Catalog of federal Domestic Assistance (CFDA) number, which is assigned by the federal funding agency and is listed on the Notice of Obligation.

Transfer requests must be received at least 45 calendar days prior to the end of the grant. If a Local Board has an unforeseen circumstance that may require an exception, the Local Board must contact OFA immediately for further discussion and direction. If the transfer exceeds 50 percent, the Local Board must provide justification for the transfer and assurance that services will be provided to the targeted population of the transferred funding source, with details on what funding sources will be used. The effective date cannot be retroactive past the current reporting period. In other words, the transfer would not change/affect the financial reports previously submitted. Local Boards must submit completed request forms, signed by the Local Board Chair (or the Director of the Local Area or other designated signatory of the Local Area, designated by resolution or identified in the Local Plan, as set forth above), by email to the DWDAL. In the event that the request is made by the Local Area Director, the Local Board Chair must timely affirm that he or she has been apprised of the requested transfer. No request will be reviewed by OFA until written affirmation is received. Written affirmation should be sent via email to the DWDAL Fiscal Manager.

Approving a Transfer

When determining whether a transfer request is approved or denied, OFA must consult the DWDAL Director of the OWD and review the Local Area's WIOA Adult and Dislocated Worker funding expenditures, obligations, and balances to ensure these are in support of the Local Board's request. OFA should request additional information or clarification from the Local Board, as needed. As set forth in the state's Policy on the authority to transfer between WIOA Title I funds, a Local Area must provide to DWDAL an assurance that there are sufficient funds in the budget

for required activities for the remainder of the PY and FY. Also, should the transfer exceed 50 percent, the Local Area must provide justification for the transfer and assurance that services will be provided to the targeted population of the transferred funding source, with details on what funding sources will be used. After reviewing the request, OFA shall email an official determination to the Local Board Chair, the Local Area Director and the Local Area Fiscal Manager, signed by the DWDAL Assistant Secretary, with the determination to approve or deny within ten business days. OFA shall file documentation in the Local Area's WIOA grant file and, when approved, the transfer amount shall be posted on the grant tracking worksheet/system. A Local Board may appeal a denial of its transfer request to the DWDAL Assistant Secretary within ten calendar days from the received date of the denial notice. The appeal must be in writing and state the grounds for the appeal.

Reporting a Transfer

Reporting a Transfer When approved, Local Areas shall report the transfer to OFA on the Adult and Dislocated Worker Quarterly Status Reports (QSRs). On the Adult QSR, Local Areas shall report the transfer as "the amount of Adult funds expended on the Dislocated Worker Program." On the Dislocated Worker QSR, Local Areas shall report the transfer as "the amount of Dislocated Worker funds expended on the Adult Program. "In turn, OFA shall report the transfer to the USDOL on the Quarterly Financial Report for both "Local Adult" and "Local Dislocated Worker."

(c) Youth Program Requirements. With respect to youth activities authorized in section 129 of WIOA—

(1) Identify the State-developed criteria to be used by local boards in awarding grants for youth activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants.

WIOA outlines a broader youth vision that is grounded in evidence-based strategies to support a service delivery system that is dedicated to achieving high-levels of performance, accountability and quality in preparing young people for the workforce. Through the WIOA Title I Youth Program, WIOA places a greater emphasis on supporting the educational and career successes of out-of-school youth. A minimum of 75 percent of WIOA Title I Youth Program funds are required to be spent on out-of-school (Note: Maryland is requesting a waiver related to this threshold in the applicable part of this Combined Plan that would reduce this figure to 50 percent). The law also requires the Youth Program's key elements to include dropout recovery strategies and services, education offered concurrently with workforce activities and training, financial literacy education, entrepreneurship, postsecondary transitional support, and Labor Market Information. Local Areas must spend at least 20 percent of WIOA Title I Youth Program funds on work experiences that incorporate academic and occupational education. The WIOA Youth Program is designed to support eligible youth in reaching their educational and career goals. To meet this aim, Local Areas and local provider that are awarded competitive contracts, must:

- Conduct an objective assessment of the participant's skills;

- Develop an Individual Service Strategy (ISS) with the participant; and
- Utilize WIOA's 14 Youth Program elements to support the participant in reaching their career and academic goals.

Selecting Service Providers

MD Labor encourages Local Boards to develop formal partnerships, through a competitive process, to select WIOA Youth Program service providers that will allow multiple agencies and organizations to fund different aspects of the WIOA Youth Program. Each local system of services can be coordinated through a combination of contracts and Memoranda of Understanding between the participating entities.

As a result of this strategy, funds from federal agencies like the Department of Justice (under programs for incarcerated youth on probation) or the Department of Health and Human Services (under programs for homeless or foster youth), or other USDOL programs (WIOA Title II Adult Education programs) could be leveraged to provide certain services for WIOA Youth Program participants to help them reach their educational and career goals.

In granting or contracting WIOA Youth Program services, Local Boards must award grants or contracts on a competitive basis to providers of youth activities identified based on the criteria identified in the State Plan and taking into consideration the ability of the providers to meet performance accountability measures. In an effort to foster WIOA partnerships, MD Labor has a preference for the Title II Adult Education service providers for instruction to help youth participants prepare for the GED® and National External Diploma Program® (NEDP®) programs.

A Local Board may award grants or contracts on a sole-source basis only if it determines there is an insufficient number of eligible providers of youth activities in the Local Area (such as a rural area) for grants and contracts to be awarded on a competitive basis. It is important to incorporate the major elements of WIOA into Requests for Proposals and youth provider contracts. For example, if a Local Area issues separate Requests for Proposals for in-school youth and Out-of-School Youth, they should be structured in a way to ensure local areas meet the 50 percent Out-of-School Youth expenditure minimum (figure aligns with Maryland's waiver request).

Local Areas should similarly incorporate the 20 percent work experience expenditure minimum into RFPs and new service provider contracts. For MD Labor's records, Local Areas must provide MD Labor with timely copies of the selected service providers' contracts or grant agreements. MD Labor encourages Local Areas that grant or contract out Youth Program services to include MD Labor's Youth & Disability Coordinator in the Requests for Proposal evaluation and selection process.

Option Year Contracts

Local Areas must incorporate WIOA requirements by amending or modifying the option years of current contracts, provided that such changes are permissible under the contract (i.e., if the contract includes legislation, regulation, or requirements). In competing new contracts, USDOL and MD

Labor encourage Local Areas to employ one-year contracts, which may contain additional option years, rather than multi-year contracts.

Given how resource-intensive the Requests for Proposal process may be, option year contracts are a strategy to ensure maximum flexibility while final regulations are published and program guidance is issued. They also provide added flexibility to Local Areas during a time of transition when regulations and guidance will be issued that could provide information necessary for future service provider contracts.

(2) Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional AJC partner programs, and any other resources available.

WIOA outlines a broader youth vision grounded in evidence-based strategies to support a service delivery system dedicated to achieving high-levels of performance, accountability and quality in preparing young people for the workforce. Through the WIOA Title I Youth Program, WIOA places a greater emphasis on supporting the educational and career successes of out-of-school youth. The law includes the Youth Program's 14 key elements to include dropout recovery strategies and services, education offered concurrently with workforce activities and training, financial literacy education, entrepreneurship, postsecondary transitional support, and Labor Market Information. Local Areas must spend at least 20 percent of WIOA Title I Youth Program funds on work experiences that incorporate academic and occupational education. The WIOA Youth Program is designed to support eligible youth in reaching their educational and career goals. To meet this aim, Local Areas and local provider that are awarded competitive contracts, must:

- Conduct an objective assessment of the participant's skills;
- Develop an Individual Service Strategy (ISS) with the participant; and
- Utilize WIOA's 14 Youth Program elements to support the participant in reaching his or her career and academic goals.

Co-Enrollment

Given WIOA's focus on providing an integrated service delivery system that leverages resources across the State, MD Labor encourages Local Areas to co-enroll youth participants in both the WIOA Youth Program and other related programs when appropriate. The following list provides examples of programs where co-enrollment may make sense for the youth participant:

- MD Labor's WIOA Title I Adult Program;
- MD Labor's WIOA Title I Dislocated Worker Program;
- MD Labor's WIOA Title II Adult Education Program;
- DHR's TANF Program;
- DHR's Supplemental Nutrition Assistance Program (SNAP);
- MSDE's DORS Program;
- MD Labor's JVSG Program;
- MD Labor's Trade Adjustment Assistance (TAA) Program;

- MD Labor's Apprenticeship and Youth Apprenticeship Program; and
- DHR's John H. Chafee Foster Care Independence Program.

Youth participants must meet eligibility criteria for participation within each program before co-enrollment occurs. Maryland recognizes that the WIOA system's mark of success goes beyond the measures required by federal partners. Utilizing the technical assistance provided to Maryland through its participation in the U.S. Department of Health & Human Services' Systems to Family Stability National Policy Academy, the WIOA Partners have worked collaboratively to determine how best to measure success. As Maryland seeks to strengthen and enhance its workforce system through implementation of the State Plan, success requires a commitment to innovation, collaboration, and a true systems approach among the State's many workforce partners.

In order to guide the WIOA Partners in this work, the Benchmarks of Success for Maryland's workforce system will set forth a clear vision, goals, and measurable achievements that help define success and lay the core foundation of this new system. These goals and benchmarks are not mere measures, but rather provide a way of thinking systematically about how Maryland delivers services. They reflect Maryland's dedication to focusing its efforts on people who need the system's assistance the most. To be clear, the intention of these benchmarks is not to be punitive; but rather, to be forward thinking about what success really means in Maryland. Utilizing these benchmarks, Maryland will work to create greater opportunities for Maryland's out-of-school youth through the alignment of the State's core partner programs.

(3) Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented.

Local Areas must ensure that each WIOA Youth Program provider consistently conducts an objective assessment of each participant's academic levels, skill levels, and service needs to properly identify the appropriate services and career pathways. The assessment must include a review of: basic skills; occupational skills; prior work experience; employability; interests; aptitudes, including interests and aptitudes for nontraditional jobs; supportive service needs; and developmental needs.

If the participant has been assessed by a provider to pursue another education or training program within the last year, the WIOA Youth Program provider may use that existing assessment to fulfill program requirements. When used, the provider must retain copies of previous assessment(s) and/or assessment result(s) in the participant's case file.

The Individualized Service Strategy (ISS) serves as a guide for both the participant and staff by outlining the necessary and recommended next steps. Through the ISS, staff should aim to identify the appropriate combination and sequence of services to help the participant fulfill goals and program requirements. It is vital that staff interpret assessment results and incorporate those results into service planning and activities. This will help to ensure that youth achieve established goals and obtain desired career and educational outcomes. Taking into account individual needs, abilities and goals, the Individualized Service Strategy must map out anticipated progress.

Local Areas must ensure that each WIOA Youth Program provider develops an Individualized Service Strategy with each youth participant after he or she has been objectively assessed. When developing the Individualized Service Strategy, the Youth Program career planner and participant must jointly take the objective assessment results into account. The career planner must also take the performance measures into account when developing goals for the Individualized Service Strategy. In the Individualized Service Strategy, career pathways must be identified and must, at a minimum, include an examination of short-term and long-term:

- Education goals;
- Employment goals;
- Appropriate achievement objectives or benchmarks/milestones; and
- Appropriate services.

Once completed, Local Areas must ensure that the ISS is signed by the Youth Program career planner and the participant. Local Areas must ensure that each participant receives a signed copy of his or her Individualized Service Strategy as record. If an Individualized Service Strategy has been developed for a participant to pursue another education or training program within the last quarter, then the WIOA Youth Program provider may use the existing Individualized Service Strategy to fulfill program requirements. The Youth Program career planner must review the Individualized Service Strategy with each youth participant every 90 days, at a minimum, to review progress and make necessary adjustments.

As the Individualized Service Strategy is a living document that should be adjusted as the participant and case manager deem necessary, Youth Program career planners should update the document to reflect changes. Examples of updates include, but are not limited to: participant progress; completed activities or benchmarks, rewriting new goals once objectives have been met, outlining a clear direction or career pathway for the participant, changes to household status, legal name changes, address changes, and other updates to contact information.

Based on assessment results and the Individualized Service Strategy, Local Areas must ensure that providers offer youth participants access to WIOA Youth Program elements that will support attainment of a secondary school diploma, entry into postsecondary education, and career readiness. All activities must be documented within theMWE, MD Labor's performance tracking and case management database system. The WIOA Youth Program consists of 14 key program elements:

1. Tutoring, skills training, and dropout prevention;
2. Alternative secondary school services;
3. Paid and unpaid work experiences;
4. Occupational skills training;
5. Leadership development opportunities;
6. Supportive services;
7. Mentoring;
8. Follow-up services;
9. Counseling;
10. Concurrent education and workforce preparation activities;

11. Financial literacy education;
12. Entrepreneurial skills training;
13. Labor Market Information (LMI); and
14. Preparing for Postsecondary Education and training.

MD Labor has provided policy guidance to Local Areas on each program element and will continue to offer support to help Local Areas achieve related goals. MD Labor's policy on the WIOA Title I Youth Program clearly states that Local Areas must ensure that providers offer youth participants access to each of the 14 key program elements. If the WIOA Title I Youth Program provider does not directly offer all program elements, it must ensure that strong partnerships and referral mechanisms are in place to provide access to each element, as necessary. Through ongoing monitoring and technical assistance, MD Labor and the Local Areas will ensure that access is effectively provided to youth participants.

(4) Provide the language contained in the State policy for "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for "requiring additional assistance to complete an education program, or to secure and hold employment" criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII).

WIOA sections 129(a)(1)(B)(iii)(VIII) and 129(a)(1)(C)(iv)(VII) define eligibility criteria for the WIOA Title I Youth Program. For in-school youth and out-of-school youth, one criterion is that an individual is low-income and requires additional assistance to enter or complete and educational program or to secure or hold employment. Maryland's Local Areas will be required to define what it means to "require additional assistance to enter or complete and educational program or to secure or hold employment."

(5) Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define "not attending school" or "attending school," indicate that is the case.

Alternative Education

At the federal level, an alternative school is defined as a public secondary school that addresses needs of students that typically cannot be met in a regular school, provides nontraditional education, serves as an adjunct to a regular school, or falls outside the categories of regular, special, or vocational education. As of September 2014, Maryland offers 89 alternative education programs in 22 of the State's 24 local school systems. Of these programs, most target students with behavioral issues, students who were in contact with law enforcement, and/or students who were having academic difficulties, as evidenced by low grades or being behind grade level. Many also target students with attendance problems. Additional information on alternative education can be found in the following ICF International report dated September 2014: https://ies.ed.gov/ncee/edlabs/regions/midatlantic/pdf/REL_2014038.pdf

Attending School and Not Attending School

While Maryland law does not define "attending school" and "not attending school," it does provide guidance on who is within the age of compulsory school attendance. Effective July 1, 2017, each child who resides in Maryland and is five years old or older and under 18 shall attend a public school regularly during the entire school year, unless the child is otherwise exempted due to attainment of a high school diploma or GED®; is receiving regular, thorough instruction during the school year in the studies usually taught in the public schools to children of the same age or has completed such instruction; is married; is active military; attends an alternate education program; or is within any other exemptions listed in Education Article, §7-301, Annotated Code of Maryland.

(6) If not using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition which must further define how to determine if an individual 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. If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case.

Basic Skills Deficient

Low educational functioning levels can be a significant barrier to educational and/or employment success. Therefore, all participants must be assessed to determine whether they have any basic skills deficiencies. The WIOA Section 3(5)(B) defines the term "Basic Skills Deficient" as an individual: (A) who is a youth, that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (B) who is a youth or adult that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Part A of the basic skills deficiency definition is identified by an assessment score at or below grade level 8. Part B of the definition, which reads "a youth who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society," must be locally defined.

The Local Areas must use valid and reliable assessment instruments and provide reasonable accommodations to youth with disabilities in the assessment process in making this determination. If appropriate, steps to improve educational functioning should be included in the participant's ISS.

(d) Single Area State Requirements.

This prompt is not applicable to the State of Maryland's Workforce Plan.

(e) Waiver Requests (optional).

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

(1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals

that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;
(2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;
(3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;
(4) Describes how the waiver will align with the Department's policy priorities, such as:
(A) supporting employer engagement;
(B) connecting education and training strategies;
(C) supporting work-based learning;
(D) improving job and career results, and
(E) other guidance issued by the Department.
(5) Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and
(6) Describes the processes used to:
(A) Monitor the progress in implementing the waiver;
(B) Provide notice to any local board affected by the waiver;
(C) Provide any local board affected by the waiver an opportunity to comment on the request;
(D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
(E) Collect and report information about waiver outcomes in the State's WIOA Annual Report.
(7) The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

Waiver Request #1: Eligible Training Provider List

(1) The State of Maryland is seeking a waiver from the requirements outlined in WIOA Sections 116(d)(4)(A) and (B) and 122(d)(2)(A) and 20 CFR 677.230(a)(4) and (5), which require the collection and reporting of performance-related data on *all students* participating in training programs listed on the ETPL. Under this waiver, Maryland will continue to collect and report performance data for *all WIOA-funded* participants in accordance with the above regulations.

Background

Following the passage of WIOA, Maryland began working towards the implementation of the ETPL and in October 2017, the State issued its *WIOA Title I Training & Maryland's Eligible Training Provider* policy. MD Labor developed the document in collaboration with representative from Local Areas, community colleges, training providers, and the Maryland Higher Education Commission. The policy includes eligibility guidelines, the approval/denial process, and annual reporting requirements.

While Maryland is proud of its efforts to deliver training opportunities to jobseekers and bolster customer choice, the State has learned that data collection requirements often prohibit quality

providers from joining or remaining on the ETPL. Training sites do not always have the manpower or time necessary to report on all served participants.

In relation to this Combined Plan, this waiver will allow training programs, community colleges, EARN Maryland providers, etc. to more easily engage in the State's workforce system. This additional participation will produce long-term solutions to sustained skills gaps and personnel shortages.

(2) There are no known state or local statutory or regulatory barriers in Maryland related to implementing the requested waiver.

(3) The goals of the waiver and expected programmatic outcomes include:

- Addition of new providers to further diversify programing offerings;
- Increased competition among providers that may lead to a decrease in associated training costs;
- Enhanced partnerships between Maryland State agencies, Local Areas, and community colleges that will allow for better customer service outcomes;
- Flexibility in assisting training provider who might not otherwise consider inclusion on the ETPL; and
- Increased customer choice.

(4) This waiver requests supports Maryland's policies and the *Benchmarks of Success for Maryland's Workforce System*, the State's strategic framework to build system-wide effectiveness around WIOA. The *Benchmarks of Success* are built around five major strategic goals:

6. Increase the earning capacity of Maryland's workforce system customers by maximizing access to employment;
7. Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of skills and credentialing;
8. Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of life management skills;
9. Increase the earning capacity of Maryland's workforce system customers by eliminating barriers to employment; and,
10. Strengthen and enhance the effectiveness and efficiency of Maryland's workforce system.

The ETPL is a useful tool in reaching these goals as it allows customers to make informed choices about training that lead to good-paying jobs and self-sufficiency.

(5) The waiver will benefit all populations, regardless of whether individuals are disadvantaged or have multiple barriers to employment, but providing the ability for the State to include a wider array of providers on the Maryland ETPL. Additionally, the waiver will ease performance-reporting burdens on providers like community colleges who often opt not to participate on the ETPL.

(6)

(A) MD Labor's Office of Workforce Information and Performance will evaluate the impact implementing the waiver has on Maryland's objectives and strategic goals.

(B) Maryland's 12 Local Areas contacted MD Labor Secretary Tiffany Robinson in October 2019 requesting that the State consider including the ETPL waiver request in the WIOA State Plan. The Local Boards are aware of aware of this request and were provided a draft via the Maryland Workforce Association president (the Maryland Workforce Association is a network representing the State's 12 Local Boards).

(C) and (D) All Local Boards, as well as workforce system stakeholders, constituents, and businesses were given an opportunity to provide feedback on this waiver request during a public comment period for the updated WIOA State Plan over two weeks in January and February 2020. Additionally, MD Labor Secretary Tiffany Robinson discussed the waiver request during the December 2019 meeting of the GWDB.

(E) Maryland will update its ETPL policy to reflect guidelines and processes for data collection. The WIOA Training Program Manager in MD Labor's Office of Workforce Information and Performance will continue to request relevant items from training providers and outcomes will be included in the WIOA Annual Report.

Waiver Request #2: Out-of-School Youth Expenditures

(1) The State of Maryland is seeking a waiver from the requirements outlined in WIOA Section 129(a)(4) and 20 CFR 681.410 requiring that "not less than 75 percent of funds allotted under Section 127(b)(1)(c), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to Local Areas under subsection (c), shall be used to provide youth workforce investment activities for out-of-school youth." Maryland requests that both the required state and local percentage for Out-of-School youth expenditures be lowered to 50 percent.

Background

Since the implementation of WIOA, Maryland's Local Areas have reported that the restructuring of WIOA Title I youth programs has enabled them to provide more meaningful work experiences for youth. Local Plans adequately address the 14 required service elements of youth programming, but some Local Areas recognize the need to further invest in at-risk in-school youth. Additionally, Maryland's diverse geographic makeup often makes engagement in more rural parts of the State a challenge.

Related to this Combined Plan, a waiver for the out-of-school youth expenditure would allow Maryland to build upon the successful AMP. In June 2018, MD Labor and MSDE announced the implementation of AMP as a new Career and Technology Education Program of Study. Because of combined efforts, 15 of Maryland's 24 local school systems have adopted the model. Moving forward, members of the MD Labor Apprenticeship and Training Program and the MSDE's Career

and College Readiness teams continue to meet with officials at Maryland K-12 public schools systems that express interest in this youth apprenticeship model. An approved waiver may continue to bolster youth participation.

(2) There are no known state or local statutory or regulatory barriers in Maryland related to implementing the requested waiver.

(3) The goals of the waiver and expected programmatic outcomes include:

- Increased services to at-risk *in-school* youth throughout Maryland's 12 Local Areas;
- Increased investment and participation in the AMP, the State's initiative to connect 11th and 12th grade youth to Registered Apprenticeship and career pathway opportunities; and
- Enhanced partnerships with the State's 24 local public school systems to ensure graduates are workforce-ready and prepared to meet the demands of local employers.

(4) This waiver requests supports Maryland's policies and the *Benchmarks of Success for Maryland's Workforce System*, the State's strategic framework to build system-wide effectiveness around WIOA. The *Benchmarks of Success* are built around five major strategic goals:

11. Increase the earning capacity of Maryland's workforce system customers by maximizing access to employment;
12. Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of skills and credentialing;
13. Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of life management skills;
14. Increase the earning capacity of Maryland's workforce system customers by eliminating barriers to employment; and,
15. Strengthen and enhance the effectiveness and efficiency of Maryland's workforce system.

Additional support for in-school youth and at-risk in-school youth will provide for earlier interventions and seamless access to career pathways.

(5) The waiver will benefit all populations, regardless of whether individuals are disadvantaged or have multiple barriers to employment. It will especially benefit at-risk in-school youth.

(6)

(A) MD Labor's Disability and Youth Services Coordinator and the Office of Workforce Information and Performance will evaluate the impact implementing the waiver has on Maryland's objectives and strategic goals.

(B) Maryland's 12 Local Areas contacted MD Labor Secretary Tiffany Robinson in October 2019 requesting that the State consider including the youth expenditure waiver request in the WIOA State Plan. The Local Boards are aware of aware of this request and were provided a draft via the Maryland Workforce Association president (the Maryland Workforce Association is a network representing the State's 12 Local Boards).

(C) and (D) All Local Boards, as well as workforce system stakeholders, constituents, and businesses were given an opportunity to provide feedback on this waiver request during a public comment period for the updated WIOA State Plan over two weeks in January and February 2020. Additionally, MD Labor Secretary Tiffany Robinson discussed the waiver request during the December 2019 meeting of the GWDB.

(E) The MD Labor Disability and Youth Services coordinator will stay abreast of waiver impact and all outcomes will be included in the WIOA Annual Report.

Title I-B Assurances

The State Plan must include assurances that:

X	1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;
X	2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;
X	3. The State has established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;
X	4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);
X	5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;
X	6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;
X	7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);
X	8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;
X	9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;
X	10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.
X	11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);

WAGNER-PEYSER ACT PROGRAM (Employment Services)

(a) Employment Service (ES) Staff.

Maryland is reviewing the new flexible regulation, as released in Training and Employment Notice 13-19, "Announcing the Release of the Wagner-Peyser Act Staffing Flexibility Final Rule and Amended Information Collections Associated with this Rulemaking," released on January 13, 2020. Maryland will make any changes the state deems appropriate after July 1, 2020.

(1) Describe how the state will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through state employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.
(Note – States not seeking to utilize the staffing flexibility in the final rule as part of their 2020 State Plan submission can answer this question by entering that the state will continue to utilize state merit staff employees)

In previous iterations of the State Plan, WIOA partners dedicated "with every regulation promulgated pursuant to the federal Act, with every guidance issued by the federal agencies charged with oversight of the programs included in this Plan, with every technical assistance and training received, Maryland dedicates to learn together." In the past four years, the State has established a WIOA Professional Development work group *and* in October of 2019, a Chief Learning Officer joined the MD Labor staff.

The key goals of the Professional Development work group are to develop a systems approach to professional development needs, determine best practices for the administration of professional development, and ensure partner integration and cross-training opportunities. The group aims to build a competent, cross-functional team capable of operating in a number of disciplines and able to move flexibly between roles, locations, and funding streams to provide seamless delivery of services. Recommendations generated by the work group include opportunities for WIOA partners, including Wagner-Peyser, to promote professional development. After a brief hiatus, the group will reconvene in 2020 under the leadership of the new Chief Learning Officer.

Recognizing the need for coordinated developmental opportunities across departments, Maryland's WIOA partners agreed to collaboratively invest in a Chief Learning Officer. The position is housed at MD Labor in the Office of the Assistant Secretary for the DWDAL. The Chief Learning Officer will support all WIOA partner staff, including those conducting Employment Services.

Maryland will utilize the "The Hub" for virtual training and workforce system resources. "The Hub" is a learning management system available to all Maryland State agencies that is maintained by Maryland's Department of Budget and Management (DBM). In 2017, MD Labor utilized WIOA implementation funds to purchase licenses for this state learning management software for the benefit of local partners. The WIOA partners will use the Hub as the platform on which state and local partners, including Wagner-Peyser staff, will be able to access a variety of training modules and resources. "The Hub" has the capacity to create two home pages: one for MD Labor-DWDAL internal training content and a second for content added by external partners. The

external home page presents an excellent opportunity to facilitate improved service integration across the system. For example, each partner can post a "101" module that provides other partners with the basics on that organization's mission, target audiences, resources, key initiatives, etc.

Maryland is committed to the professional development of its staff and all WIOA partners. Leveraging "the Hub" and other resources will allow the partners to learn from each other and better assist their common customers.

(2) Describe strategies developed to support training and awareness across core programs and the UI program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to DUI staff for adjudication.

Under Title III of WIOA, the Wagner-Peyser Act, a greater emphasis is placed on providing services to UI claimants with referrals to additional AJC services. This is in an effort to ensure claimants remain eligible for UI benefits and to provide meaningful assistance in their efforts to regain employment. Labor exchange services, which are the primary services provided under Wagner-Peyser, fall under the basic career services identified in WIOA. Wagner-Peyser staff must use funds authorized by WIOA to provide basic career services.

As a result of increased collaboration, DWDAL and the DUI have enhanced staff training and coordination on policy implementation efforts. The two divisions will continue working to assess Title I and III AJC staff training needs and the Chief Learning Officer will assist with the development and delivery of trainings.

In October 2019, DWDAL held a three-day reemployment retreat with targeted professional development sessions for approximately 100 Wagner-Peyser and MD Labor central office staff. Topics included utilizing the MWE, resume workshops, and accessibility. Staff from the DUI participated in the event and presented on UI eligibility and referral coordination.

In 2017, the State implemented the Reemployment Exchange module within MWE. Maryland's purchase of the REX module allowed the State to establish a single web-based application for both workforce registration and filing of unemployment claims. The common registration function allows for seamless transition between UI and workforce platforms. Integration of the two systems provides a centralized data system and coordinated registration for UI claimants to enter and perform necessary tasks while collecting UI benefits. Upon completion of a UI registration, a Wagner-Peyser registration is automatically created. Rather than seeking the same data elements, requiring the claimant to spend more time on entering and re-entering information into both systems, which is the case currently, the REX module allows for the claimant to focus on what is important: reemployment.

Through the purchase of the REX module, Maryland is more proactive in its reemployment activities. Immediately after an individual files an initial UI claim or a UI weekly certification in REX, the system creates a reemployment roadmap for the individual. Implementing a robust, online system facilitates the sharing of information in real time between the UI benefits system and MWE. This, in turn, ensures proper payments are made and those claimants are actually

meeting the goals set for them by the State's workforce and UI staff. This requires, the continued cross-training between workforce and UI staff.

(b) Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through AJC centers, as required by WIOA as a career service.

In collaboration with workforce development program managers, DUI staff will continue to provide training and technical assistance as needed. AJC offices have access to fact sheets, developed by DUI, that provide basic instruction on how to apply for an initial UI claim online or via telephone. For customers that need additional intensive assistance, DUI staff will be available by phone and email to answer specific questions AJC staff may not be able to provide. Claimants will be able to reach subject matter experts at 410-767-3246 or wayne.cooper@maryland.gov. Wagner-Peyser, ROW, and RESEA staff have been provided training by DUI staff to answer most common questions posed. In addition a FAQ site will be available: http://www.dllr.maryland.gov/employment/claimfaq.shtml.

(c) Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals.

DWDAL and the DUI work collaboratively to provide workforce development opportunities to all UI claimants, totally and partially unemployed, in Maryland. This is accomplished utilizing a variety of strategies including initial mailers from DUI describing the requirement for workforce enrollment and call in of claimants for RESEA or ROW activities. Under the Maryland UI law, claimants must register in Maryland's AJC system within five days of receiving the UI pamphlet. Claimants must register either in person by visiting their nearest AJC career center or via the internet at https://mwejobs.maryland.gov/vosnet/Default.aspx. A list of Maryland's AJCs is included as part of the mailed pamphlet.

WIOA increases connections between UI and reemployment services and the UI system. Maryland offers its full array of AJC Services, including basic and individual career services and training services under WIOA. UI claimants will benefit from the enhanced services, including the labor exchange services and career guidance that are included as career services under Title I as well as activities that assist workers in identifying and obtaining jobs in in-demand industries and occupations. Maryland utilizes permanent Wagner-Peyser staff to conduct RESEA activities under Title III WIOA changes. From the UI first pay list, claimants most likely to exhaust benefits are selected to take part in the RESEA program along with UCX claimants. The remaining claimants will be assigned to the ROW. RESEA claimants may be referred to ROW as a result of the RESEA after the eligibility review and if determined that it will assist in reducing the length of unemployment. Historically, Maryland's Worker Profiling and Reemployment Services (WPRS) system identifies between 20,000-30,000 claimants annually.

Maryland's purchase of the REX module will allow the State to establish a single web-based common intake portal for both workforce registration and filing of unemployment claims. The common registration function will allow for seamless transition between UI and workforce platforms.

(d) Describe how the State will use W-P funds to support UI claimants, and the communication between W-P and UI, as appropriate including the following:

(1) Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

The goal of reemployment in Maryland is to ensure claimants are engaged with their local AJCs beyond the initial mandatory contact for continued eligibility. Labor Exchange staff are an important part of the strategy to keep claimants engaged in the centers. As part of this strategy, Labor Exchange staff provide reemployment services to claimants during the one on one assessment interviews for RESEA. Staff will make appropriate referrals to programs based on assessment of need during the meeting.

The elements which comprise Maryland's RESEA are AJC Orientation, Labor Market Information provision, Individual Reemployment Plan, Referral to Reemployment and Training Services, and Eligibility Review Interview. As part of the program, claimants are required to complete two additional services within 45 days of the completed RESEA workshop. Claimants and trainers mutually agree upon which of the array of AJC services are most beneficial to assist in a job search. Examples of AJC program referrals may include WIOA training, the POAC, and specific training for ex-offenders, GED® seekers, seniors, and other workshops (e.g. resume writing and interviewing). The mutually agreed upon service is recorded in MWE and on the claimant's Individual Reemployment Plan. The trainer follows the Individual Reemployment Plan to assure compliance with the agreement. If a claimant fails to follow through on agreed upon reemployment services within 45 days, they are referred to UI for adjudication.

The ROW provides reemployment assistance to UI claimants not served by the RESEA program. ROW trainers provide services at AJCs. The goals of the program include shortening the duration of UI and connecting UI claimants to Wagner-Peyser programs. The delivery of reemployment services involves a coordinated approach, involving DUI, Wagner-Peyser, and WIOA Title I staff. ROW is open to all jobseekers, whether they are a current UI claimant or employed, dependent on available space.

Each identified profiled candidate is contacted regarding participation in a job finding and career enhancing workshop for a six hour presentation that covers, at a minimum, the job acquisition process, which includes self-assessment, career transition, resume writing, employment related correspondence, and interviewing. Local programs are encouraged to provide well-rounded information with additional topics for customers and partners. Each workshop participant will know by the end of the workshop that successful employment is the ultimate goal, and all AJC staffers are available to assist with their job search. Each workshop completer receives targeted and specific job search assistance, beginning in the workshop, with emphasis on appropriate and pertinent Labor Market Information.

Self-assessment instruments, access to supportive services and partner agencies, and individual and group counseling (career guidance) are available. The workshop includes referral and access to program staff, training, and additional resources. In addition, local training staff can access lists

of workshop completers to provide follow up inquiries to potential dislocated workers. Job matching services, one-on-one conferences, follow-up activities, and meetings are used as tools to help customers obtain rapid reemployment. Each workshop participant is contacted for follow-up assistance and additional services.

Workshops are available that address interviewing skills, application preparation, résumé writing, social media, and job searches on the Internet. Participants can access information and/or receive referrals to upcoming job fairs, employer recruitment events, and links to other AJC partners. Partners participate in the RESEA program and ROWs to provide essential information on-site. Participants who need additional training to obtain employment are assisted through WIOA programs.

With increasing numbers of LEP individuals filing UI claims, Maryland is responding to the need by providing Spanish-language workshops (Spanish is the most common non-English language spoken in the state). Workshop materials have been translated into Spanish, and a Spanish-speaking workshop facilitator has been hired to provide Spanish-language workshops in the areas with the largest numbers of LEP claimants. The Spanish language facilitator will be available to the rest of the State as numbers increase to provide services to claimants. In addition, the Spanish language facilitator has developed value added workshops, such as interviewing strategies and basic computer classes, for RESEA claimants as part of follow up services.

DWDAL and the DUI continue to work collaboratively to ensure that staff questions, concerns, and challenges are quickly identified and addressed. There is great importance attributed to the fact that DWDAL and the DUI's administration meet regularly to orient themselves toward the highest standards for the RESEA program. Also, the Reemployment Program Manager and the UI Administrator jointly host regular program staff meetings to provide technical assistance, guidance, and training in such areas as UI eligibility issues, fact finding processes, data system operations and reporting, site-specific issues from a more global perspective, and integration of the RESEA program into the AJC fabric. These ongoing meetings are designed to enhance communication, clarify RESEA/ROW reporting errors, and address any program related questions. USDOL recently cited how impressed they were by the level of communication between DUI and DWDAL as it relates to collaborative work with UI claimants.

(2) Registration of UI claimants with the State's employment service if required by State law;

DWDAL and the DUI work collaboratively to provide workforce development opportunities to all UI claimants, totally and partially unemployed, in Maryland. This will be accomplished utilizing a variety of strategies including initial mailers from DUI describing the requirement for enrollment and call in of claimants for RESEA or ROW for UI claimants. Under the Maryland UI law, claimants must enroll in Maryland's AJC system within five days of receiving the UI pamphlet. Claimants must enroll either in person by visiting their nearest AJC career center or via the internet at https://mwejobs.maryland.gov/vosnet/Default.aspx. A list of Maryland's AJCs is included as part of the mailed pamphlet.

Using the WPRS, Maryland selects all UI claimants who have received an initial payment. By identifying these claimants, the OWD/UI can: 1. Engage claimants sooner; 2. Provide

reemployment services to more claimants faster; 3. Ensure claimants are fulfilling work search requirements; and 4. Refer claimants who may be non-compliant with Maryland UI law for adjudication. Maryland worked with the USDOL to update its current methodology and will integrate the new methodology when UI modernization is completed in 2020. The decision was made to begin clean and to allow focus on completion of modernization for a seamless transition. Once the methodology is fully updated, every two years it will be reviewed and adjusted to reflect current economic conditions. By having a current methodology, Maryland can provide a wide-reach of relevant reemployment services to meet customers' needs. Maryland offers its RESEA Program to claimants profiled as most likely to exhaust benefits. ROW continues to be an available service for all other claimants as a path to reemployment.

By the fourth week of the initial claims filing process, profiled claimants are sent a letter, which schedules them for one of the workshops immediately after selection. The letter reinforces the requirement to register in the MWE. Follow-up emails are utilized as reminders of required attendance. MD Labor will ensure profiled claimants are fully engaged and registered within the workforce system. Claimants identified as failing to register will be directed to do so prior to completion of the workshop, and registration will be verified by the trainer.

WIOA increases connections between the job training and employment services and the UI system. Maryland will offer its full array of AJC Services as options for reemployment services to UI customers, including basic and individual career services and training services under WIOA. UI claimants will benefit from the enhanced services, including the labor exchange services and career guidance that are included as career services under Title I as well as activities that assist workers in identifying and obtaining jobs in in-demand industries and occupations. Maryland utilizes permanent Wagner-Peyser staff to conduct RESEA activities under Title III WIOA changes.

From the UI first pay list, the WPRS will profile claimants weekly, with those profiled as most likely to exhaust assigned to the RESEA program along with UCX claimants. The remaining claimants will be assigned to the ROW. RESEA claimants may be referred to ROW as a result of the RESEA after the eligibility review and if determined that it will assist in reducing the length of unemployment. Historically, Maryland's WPRS system profiles between 20,000-30,000 annually.

The elements which comprise Maryland's RESEA are AJC Orientation, Labor Market Information provision, Individual Reemployment Plan, Referral to Reemployment and Training Services, and Eligibility Review Interview. Claimants and trainers will mutually agree upon which of the array of AJC services are most beneficial to assist in a job search. Examples of AJC program referrals may include WIOA training, POAC, and specific training for ex-offenders, GED® seekers, seniors, and other targeted populations.

The mutually agreed upon service is recorded in MWE and on the claimant's Individual Reemployment Plan. The trainer follows the Individual Employment Plan to assure compliance with the agreement. If a claimant fails to follow through on agreed upon reemployment services within 45 days, they are referred to UI for adjudication. The ROW provides reemployment assistance to UI claimants not served by the RESEA program. ROW trainers provide services at AJCs. The goals of the program include shortening the duration of UI and connecting UI claimants

to Employment Service programs. The delivery of reemployment services involves a coordinated approach, involving DUI, Wagner-Peyser, and WIOA Title I staff. ROW is open to all jobseekers, whether they are a current UI claimant or employed. Each profiled candidate is contacted regarding participation in a job finding and career enhancing workshop for a six hour presentation that covers, at a minimum, the job acquisition process, which includes self-assessment, career transition, employment related correspondence, and interviewing.

Local programs are encouraged to provide well-rounded programs with additional topics for customers and partners. Each workshop participant will know by the end of the workshop that successful employment is the ultimate goal, and all AJC staffers are available to assist with their job search. Each participant who completes the workshop receives job search assistance, beginning in the workshop, with emphasis on appropriate and necessary Labor Market Information. Self-assessment instruments, access to supportive services and partner agencies, and individual and group counseling (career guidance) are available.

The workshop includes referral and access information to program staff, training, and additional resources. In addition, local training staff can access lists of workshop completers to provide follow up inquiries to potential dislocated workers. Job matching services, one-on-one conferences, follow-up activities, and meetings are used as tools to help customers obtain rapid reemployment. Each workshop participant is contacted for follow-up assistance and additional services.

Workshops are available that address interviewing skills, application preparation, résumé writing, social media, and job searches on the Internet. Participants access services and attend workshops at the AJC. Participants also receive referrals to upcoming job fairs and employer recruitment events and link with other AJC partners. Partners participate in the RESEA and ROW workshops to provide on-site information pertaining to employment or essential services.

Participants who need additional training to obtain employment are assisted through WIOA programs. With increasing numbers of LEP individuals filing UI claims, Maryland is responding to the need for Spanish-language workshops. Workshop materials have been translated into Spanish, and Spanish-speaking workshop facilitators provide Spanish-language workshops in the areas with the largest numbers of LEP claimants. Spanish-language services are available in the rest of the state as well.

DWDAL and the DUI continue to work collaboratively to ensure that staff questions, concerns, and challenges are quickly identified and addressed. There is great importance attributed to the fact that DWDAL and the DUI's administration meet regularly, to orient themselves toward the highest standards for the RESEA program. Also, the Reemployment Program Manager and the UI Administrator host regular program staff meetings jointly to allow for frequent training and technical assistance in such areas as UI eligibility issues, fact finding processes, data system operations and reporting, site-specific issues from a more global perspective, and integration of the RESEA program into the AJC fabric. USDOL recently cited how impressed they were by the level of communication between DUI and DWDAL as it relates to collaborative work with UI claimants.

(3) Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and

Maryland utilizes permanent Wagner-Peyser staff to conduct RESEA activities under Title III WIOA changes. From the UI first pay list, the WPRS will profile claimants weekly, with those profiled as most likely to exhaust assigned to the RESEA program along with UCX claimants. The remaining claimants will be assigned to the ROW. RESEA claimants may be referred to ROW as a result of the RESEA after the eligibility review and if determined that it will assist in reducing the length of unemployment. Historically, Maryland's WPRS system profiles between 20,000-30,000 annually.

The elements which comprise Maryland's RESEA are AJC Orientation, Labor Market Information provision, Individual Reemployment Plan, Referral to Reemployment and Training Services, and Eligibility Review Interview. Claimants and trainers will mutually agree upon which of the array of AJC services are most beneficial to assist in a job search. Examples of AJC program referrals may include WIOA training, POAC, other workshops, specific training for ex-offenders, GED® seekers, seniors, and other targeted populations. The mutually agreed upon service is recorded in MWE and on the claimant's Individual Reemployment Plan. The trainer follows the Individual Employment Plan to assure compliance with the agreement. If a claimant fails to follow through on agreed upon reemployment services within 45 days, they will be referred to UI for adjudication.

The ROW provides reemployment assistance to UI claimants not served by the RESEA program. ROW trainers provide services at AJCs. The goals of the program include shortening the duration of UI and connecting UI claimants to Employment Service programs. The delivery of reemployment services involves a coordinated approach, involving DUI, Wagner-Peyser, and WIOA Title I staff. ROW is open to all jobseekers, whether they are a current UI claimant or employed. Each identified profiled candidate is contacted regarding participation in a job finding and career enhancing workshop for a six hour presentation that covers, at a minimum, the job acquisition process, which includes self-assessment, career transition, employment related correspondence, and interviewing.

Local programs are encouraged to provide well-rounded programs with additional topics for customers and partners. Each workshop participant knows by the end of the workshop that successful employment is the ultimate goal, and all AJC staffers are available to assist with their job search. Each workshop completer receives targeted and specific job search assistance, beginning in the workshop, with emphasis on appropriate and necessary Labor Market Information. Self-assessment instruments, access to supportive services and partner agencies, and individual and group counseling (career guidance) are available. The workshop includes referral and access information to program staff, training, and additional resources. In addition, local training staff can access lists of workshop completers to provide follow up inquiries to potential dislocated workers. Job matching services, one-on-one conferences, follow-up activities, and meetings are used as tools to help customers obtain rapid reemployment. Each workshop participant is contacted for follow-up assistance and additional services.

Workshops are available that address interviewing skills, application preparation, résumé writing, social media, and job searches on the Internet. Participants access services and attend workshops at the AJC. They also receive referrals to upcoming job fairs and employer recruitment events and link with other AJC partners. Partners participate in the ROW or RESEA workshops to provide pertinent information on-site or through their websites. Participants who need additional training to obtain employment are assisted through other WIOA programs.

With increasing numbers of LEP individuals filing UI claims, Maryland is responding to the need for Spanish-language workshops. Workshop materials have been translated into Spanish, and Spanish-speaking workshop facilitators provide Spanish-language workshops in the areas with the largest numbers of LEP claimants. Spanish-language services are available in the rest of the state as well.

Maryland profiles all Spanish-speaking UI claimants that file a claim certification for request for payment. This is a change from the previous method of calling-in based on first payment of a claim. If a claimant does fail to report to a required reemployment activity a referral will be made to UI for review. This allows labor exchange staff to have claimants engaged within two weeks of filing for UI. Claimants that fail to report and register in the MWE are referred to unemployment staff for fact-finding and adjudication for their continued eligibility for benefits.

DWDAL and the DUI continue to work collaboratively to ensure that staff questions, concerns, and challenges are quickly identified and addressed. There is great importance attributed to the fact that DWDAL and the DUI's administration meet regularly, to orient themselves toward the highest standards for the RESEA program. The Reemployment Program Manager and the UI Administrator jointly host regular program staff meetings to allow for frequent training and technical assistance in such areas as UI eligibility issues, fact finding processes, data system operations and reporting, site-specific issues from a more global perspective, and integration of the RESEA program into the AJC fabric.

(4) Provision of referrals to and application assistance for training and education programs and resources.

DWDAL and the DUI work collaboratively to provide workforce development opportunities to all non-job attached claimants in Maryland. This will be accomplished utilizing a variety of strategies including initial mailers from DUI describing the requirement for enrollment and call in of claimants for RESEA or ROW for UI claimants. Under the Maryland UI law, claimants must enroll in Maryland's AJC system within four weeks of receiving the UI pamphlet. Claimants must enroll either in person by visiting their nearest AJC career center or via the internet at https://mwejobs.maryland.gov/vosnet/Default.aspx. A list Maryland's AJCs is included as part of the mailed pamphlet.

WIOA increases connections between the job training and employment services and the UI system. Maryland will offer its full array of AJC Services as options for reemployment services to UI customers, including basic and individual career services and training services under WIOA. UI claimants will benefit from the enhanced services, including the labor exchange services and career

guidance that are included as career services under Title I as well as activities that assist workers in identifying and obtaining jobs in in-demand industries and occupations.

e. Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA.

The AOP must include an assessment of need. An assessment need describes the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the state. Such needs may include but are not limited to: employment, training, and housing. The assessment of need must include:

(1) Assessment of Need

Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

Maryland's multi-billion dollar agricultural industry sector remains the largest commercial industry in the State.[10] According to the United States Department of Agriculture's (USDA) National Agricultural Statistics Service, 12,256 farms were operating in the State in 2016, producing an annual economic impact of 2.2 billion dollars for the year. Consistent with national statistics, 84 percent of Maryland's farms are classified as family farms.[11]

While the agricultural sector continues to flourish, the demand for farmworkers has seen an overall decline. The drop in field crop values from 2012-2106[12][iii] set against a backdrop of rising farmland values may be driving a shift in some agricultural employers' investments. An increased focus on grain crops that utilize mechanization may also be contributing to decreased labor demands, since Maryland's MSFWs have historically been employed in picking and packing fruits and vegetables. Some local distilleries are working to research grains that will grow well in Maryland in the hopes of partnering with farmers switching to grain crops. The distillers and brewers would like to purchase locally grown grains with which to brew their craft beers and spirits. While this may not increase the demand for farm workers, it may be an avenue for farmers to continue to farm and possibly increase their revenues.

Maryland's agricultural employers anecdotally report that the decreased need to labor has not eased an ongoing struggle to recruit qualified U.S. workers to meet their hiring needs. Employers compensate for the shortage of domestic workers by seeking temporary agricultural workers through the FLC H-2A program. The USDA's 2016 Annual Report indicates that Maryland ranks 34th in the nation for H-2A certifications, with 804 H-2A positions approved.

[10] http://msa.maryland.gov/msa/mdmanual/01glance/html/agri.html
[11] https://www.nass.usda.gov/Quick_Stats/Ag_Overview/stateOverview.php?state=MARYLAND
3.https://www.nass.usda.gov/Statistics_by_State/Maryland/Publications/Annual_Statistical_Bulletin/2016/2016-2017%20MD%20Annual%20Bulletin.pdf

Both H-2A workers and MSFWs who work in Maryland face many of the same challenges confronted by farmworkers elsewhere. Access to affordable healthcare and dental services is limited for farmworkers who live and work in remote locations where reduced cost services are either unavailable or require significant travel. Some MSFWs have complained that they do not have enough secure storage space for their belongings during the off-season. Outreach staff will work with MSFWs on an ongoing basis to identify challenges and assist in addressing issues via referrals or other assistance, as appropriate. As reported by one grower, there are farms that are having their H2A workforce not arrive, at all. This workforce uncertainty is presenting a challenge.

(2) An assessment of the agricultural activity in the State means:

1. Identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity;

As shown below, the top five major crop activities across Maryland continue to employ a declining number of migrant and seasonal farm workers.

Table: Top Five Labor-Intensive Crops for Migrant & Seasonal Farm Workers

Crop	Description
Nursery Stock	Employs workers across the state from March through November. Nursery stock growing actually has a bifurcated annual time span which peaks in the spring and in the fall. A cool spring and late frost in the most recent growing season affected nursery production slightly.
Diversified crops	Many vegetables are grown in the central, more cosmopolitan regions of the state. These crops are available in local farm stands and grocery stores throughout the summer months.
Tomatoes	According to the 2017 census by the United States Department of Agriculture (USDA), Maryland's primary vegetable crop is sweet corn. "Grape acreage" has increased from 700 acres in 2012, to 1,200 acres. https://www.usda.gov/media/blog/2019/06/04/maryland-agriculture-has-it-all
Cantaloupes & Melons	Harvested predominantly on Maryland's Eastern Shore during the months of July and August.
Fruit Orchards	Maryland's fruit orchards typically include apples, peaches, and occasionally other fruit. These employ workers generally along Maryland's northern and western borders (i.e. the Mason-Dixon Line) from July through October, depending on the varieties of fruits grown at the particular orchard.

2. Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce):

Anecdotal evidence suggests that Maryland's agricultural employers are challenged by the scarcity of workers interested in the agricultural field. Historically, most Maryland farms were family owned and operated, and passed down through generations. Current trends suggest that younger generations tend to leave for other employment because they do not want to continue the family farm business. When this occurs, anecdotes collected from farmers suggest that farms either go

out of business or resort to hiring via the H2A Program. According to online job postings, employers hiring in the Agriculture, Forestry, Fishing and Hunting industry in Maryland need workers with landscaping, agricultural, and interpersonal skills (MWE, 2016). In terms of tools and technology, employers need employees skilled in the use of cell phones, forklifts, trucks, and fertilizer spreading equipment.

3. Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State.

From 2010 to 2014, Maryland has experienced an increase in population of 3.5 percent. Maryland is very densely populated and is the sixth most densely populated state in the United States, which may be a contributing factor to the steady decline of crop farming across the State.

(3) An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics
(including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration.

Previously, Maryland's MSFWs largely came from Florida and a few Southern states along the Eastern Seaboard. Florida is no longer listed as a MSFW supply state. Due to hurricane damage to citrus trees, many workers were re-trained in construction. When new citrus was ready for harvest, many workers elected to stay in their training careers rather than return to formwork. This meant Maryland farmers/growers had to rely more heavily on H2A visas to staff their crop harvests. The H2A population is almost exclusively Latino and Spanish-speaking.

The MSFW population consists of either: (1) long-time migrants who have been picking crops for years; or, (2) persons of various backgrounds who are seeking to be part of an underground economy, which is difficult to trace for various legal reasons. According to 2013 USDOL data, MD Labor certified 640 H2A positions in Maryland, with the top work locations being: Kennedyville in Kent County, Westminster in Carroll County, and
Chesapeake City in Cecil County.

In Maryland, the MSFW growing season begins in early to mid-March when nursery workers begin to arrive. Peak season is during July and August for harvesting vegetables including tomatoes, cantaloupes, and melons. The harvest season concludes with the fall apple harvests, mostly in the Cumberland Valley of Western Maryland. Despite a declining number of family farms overall, data from the Maryland Department of Agriculture suggest that the vast majority of Maryland farms continue to be family farms that do not employ outside labor.

Maryland farms are mostly settled in pockets, maintained by Amish and Moravian families, who are known to rely only on the labor of family and friends. Both the number of farms employing

MSFWs and the number of Migrant and Seasonal Workers who are employed have annually declined. Maryland estimates that fewer than 1,000 MSFWs are employed in the State's agricultural fields during the growing season. During the winter months, from December through February, virtually no MSFWs are employed in the State.

(4) Outreach Activities

The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

(A) Contacting Farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

Outreach workers employ a variety of strategies to contact MSFWs who are not being reached by the normal intake activities conducted through the State's AJC network. MD Labor's MSFW Outreach Workers regularly visit local farms to provide MSFWs with information on available employment services, offering brochures and handouts that describe where AJCs and other organizations and resources are located and how they can be accessed. Outreach workers will provide MSFWs with information related to bilingual assistance, educational and training programs, health clinics, day care services, transportation resources, and immigration assistance, as appropriate.

Outreach Workers monitor the MWE to identify MSFWs who register remotely. When a potential MSFW is identified through MWE, staff will contact the individual via phone, email or letter to provide information on the full array of AJC services and invite participation. In addition, FLC staff provide information on farmworker rights, the Employment Service and Employment-Related Law system, and support services to any H-2A workers and MSFWs they encounter on work site visits. Mobile job centers equipped with computers are available in some Local Areas, enabling MSFWs to use the MWE system, a job search tool designed for job seekers, employers, training providers, workforce professionals, and others seeking workforce services. MWE provides fast access, in both English and Spanish, to a complete set of employment tools.

(B) Providing technical assistance to outreach staff.

Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e., availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System ("Complaint System" described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

Technical Assistance for Maryland's Outreach Workers Technical assistance is provided continuously to outreach workers, mainly by the State Monitor Advocate. Because the staff is small in size, the State Monitor Advocate is able to accompany local staff on outreach visits and

review outreach topics, such as AJC services, career services, current available employment opportunities, the employment service complaint system, other organizations who serve MSFWs and other specific populations in the Local Area, and farmworker rights. Pre-season meetings are held annually with complaint system training to review program requirements. While MD Labor has not increased its number of staff who conduct outreach, the program is reviewed annually by appropriate staff and supervisors in the AJCs. Personal interaction between the State Monitor Advocate and local workforce staff helps to ensure that technical assistance is consistent and updated as appropriate.

Staff and the State Monitor Advocate review labor law posters annually and assure that they are posted in the places where MSFWs live and work. This seems to be the most effective method for communicating rights regarding terms and conditions for employment. Staff also visit places where H2A workers are employed, especially where field checks are conducted, to ensure that workers have been given and understand the provisions found in their terms and conditions for employment.

During visits to agricultural worksites, Outreach Workers talk to MSFWs about farmworker rights, and explain the process for registering complaints with the Employment Service and Employment-Related Law system, assisting MSFWs in submitting complaints, as requested. Outreach Workers are trained to identify apparent violations of housing and safety regulations, and can provide MSFWs with information on a range of support services. FLC staff offer training to outreach staff so they will be prepared to conduct inspections of MSFW housing, should it be required.

C. Increasing outreach worker training and awareness across core programs including the Unemployment Insurance program and the training on identification of UI eligibility issues.

The State Monitor Advocate also seeks coordination with agencies and organizations on the federal, state and local levels that might be able to assist with regular concerns expressed by Maryland's agricultural communities. Outreach workers and the State Monitor seek out opportunities to keep current with new trends in farming, monitoring publications and newsletters related to agriculture, as well as networking through outreach to various organizations at available public meetings. For example, the small local publication, "Homegrown Frederick," reports that local small distilleries, and micro-brewers are testing which grains grow best in Maryland. They are collaborating with local farmers to supply their grains and ~~want~~ to reduce possible risks of crop failures by identifying the best varieties for local conditions.

The State Monitor Advocate monitors farming related publications to identify trends in farming and to learn of possible new opportunities for farmers. New, as reported in the "Homegrown Frederick" publication is the partnering of local brewers and distillers with local farmers. With the goal of buying their grains locally, companies are determining which grains grow best in Maryland, to reduce risk to farmers. As grains require less farmworkers, this helps farmers meet the challenge of remaining in farming despite the shrinking population of farmworkers.

Finally, as part of local business service teams, MD Labor will seek connections with organization that work with MSFW populations and invite these organization to partner on outreach efforts. In

addition, organizations will be invited and encouraged to be part of AJC activities and training to ensure all partners have an awareness of programs available to assist MSFW populations.

D. Providing State merit staff outreach workers professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.

To ensure high quality services to both jobseekers and business, professional development opportunities are currently available and advertised through regular communications from Central Office administration. Under WIOA, through leveraging partnerships, new professional development and training opportunities on topics relevant to all WIOA Partners will be available to staff. To ensure a positive customer experience, when MSFWs are actively working in the State, MD Labor's outreach workers provide monthly reports to the State Monitor Advocate that assist in identifying professional development needs. Maryland's State Monitor advocate is responsible for continuously reviewing state-wide agricultural activities and the provision of labor exchange and training services to employers and employees within agricultural communities.

E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

If an NFJP grantee is the State Workforce Agency's (SWA) subrecipient conducting outreach, provide:

i. A description of that relationship;
ii. A description of any other MSFW service providers the NFJP is coordinating with; and
iii. The NFJP grantee's outreach plan to be included in the State Plan.

Coordinating with the National Farm Workers Jobs Program & Community Service Agencies Telamon Corporation, Maryland's WIOA Title I Section 167 National Farm Workers Job Program grantee, Telamon, is co-located with multiple WIOA agencies in the Salisbury AJC. The Job Center and Telamon Corporation formalize their relationship via a Memoranda of Understanding and Resource Sharing Agreement, which ensures MSFWs receive the appropriate level of assistance and identifies how resources will be shared and contributions will be made.

Each spring, MD Labor and Telamon Corporation jointly host a pre-season meeting with public and private community service agencies and MSFW groups. This meeting allows for the State team to appropriately plan outreach efforts and pathways for communication. It also ensures maximum cooperation and information sharing across agencies that interact with Maryland's farm worker and agricultural employers.

In a team approach, Telamon and MD Labor also visit the agricultural employers and migrant and seasonal workers. Telamon provides translation services to allow MD Labor to communicate with the MSFWs. MD Labor offers job seeker services and referrals to supportive services. Telamon offers food bank access, clothing, heat stress and pesticide training, ESOL training, and referrals to housing. The Lower Shore Workforce Area provides the mobile one-stop to allow the MSFW's to access job opportunities, and other resources available through MWE. Usually when the mobile is used, Telamon, MD Labor and Lower Shore staff the mobile and use the mobile for the basis of

operation in the field. The other workforce partners provide literature about their services to the outreach team for distribution to the MSFWs, and are available for referrals.

5. Services provided to farmworkers and agricultural employers through the one-stop delivery system. Describe the State agency's proposed strategies for:

(A) Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system.

This includes:

(i) How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;

Both workers and employers in the agricultural field are able to access the same services that are freely available to the public. Each of the State's AJCs is equipped with staff who provide a variety of services for both jobseekers and employers. Staff stay current on available programs and resources through staff meetings, trainings, and continuous information sharing. The full range of services to the agricultural community is provided through Maryland's AJC network. The centers and staff provide services to jobseekers such as:

- Job search workshops and resources including internet access
- Reemployment services
- Veterans services
- Distribution of federal, State & local government information
- Career planning and training programs
- Access to labor market information
- Bilingual assistance
- Complaint handling

MD Labor raises awareness of available services within the MSFW community through oral communication and distributing bilingual brochures specifically designed for this community. Recognizing that many MSFWs may require English Language Acquisition, brochures provide pictorial representations to ensure the message is effectively received.

Outreach to agricultural employers is conducted using a number of strategies. The most effective strategy has been through use of the Rural Services Coordinator who provides guidance and technical assistance to local staff and works closely with individual agricultural employers across the state. The Rural Services Coordinator's long-standing relationship with agricultural employers assists the state agency to provide a conduit to additional business services. Maryland has recently hired an additional staff person as a business service staff person. The staff person works closely with Rural Service Coordinator to identify and assist new agricultural employers in the state.

Another current strategy in place is use of Foreign Labor staff from the AJCs. Currently, business service staff are assigned the function of collecting wage survey data. This allows business service

staff the opportunity to ask additional questions concerning their business needs. The result of the discussion will be used to determine how the AJC can provide assistance.

(ii) How the State serves agricultural employers and how it intends to improve such services.

Maryland uses a regional business service approach. This strategy creates a team of business professionals that are trained, flexible and articulate concerning all AJC programs. The result is a decrease in employee fatigue and a complete resource to employers. Regional business service staff will also be aware of the supply side of their region in working with agricultural employers as well as the resources available within their region. Agricultural Employers may also utilize the MWE to advertise their available employment, allowing more prospective employees to apply for agricultural jobs.

B. Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups.

Biannually, the State Monitor Advocate trains AJC staff on the Employment Service Complaint System. AJC staff are then equipped to the Complaint System to jobseeker customers. The System is available through legal advocacy groups and other farmworker advocacy organizations. Upon request, the State Monitor Advocate speaks at advocacy meetings to highlight the System. MSFWs are advised of their right to file complaints during outreach visits. There are also posters providing information about specific contacts with whom to file complaints at AJCs. Additionally, the outreach workers, as well as the State Monitor Advocate provide information on filing complaints and all are made aware that they do not have to go to an AJC to do so. Maryland does not have day-haul facilities. Advocacy groups are made aware of the complaint system at joint meetings.

C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

MD Labor markets the Agricultural Recruitment System to agricultural employers to ensure Maryland meets the regulatory requirements associated with FLC applications. However, the majority of marketing for AJC services is accomplished through personal contact and relationship building with the agricultural community. Additionally, MD Labor employs a full-time Rural Services Coordinator who provides guidance and technical assistance to local staff and works closely with individual agricultural employers across the State

Outreach personnel and business representatives continually look for new opportunities to market the Agricultural Recruitment System. The majority of marketing for AJC services is accomplished through personal contact and relationship building with the agricultural community. Local agricultural establishments do not use the Agricultural Recruitment System, because Maryland farmers have found that employees are not seeking agricultural employment.

4. Other Requirements

A. Collaboration

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

The Salisbury Job Market, Tri-county Council, and Telamon Corporation have a formally executed Memorandum of Understanding which codifies the participation for provision of services to the Agricultural Community in that Local Area. Telamon has annually renewed its partnership with the Job Corps program, which provides the majority of pesticide training where needed across the state. The State Monitor Advocate and local staff attend periodic meetings of agencies and partner organizations which are known to provide services to Maryland's agricultural community. It is intended that attendance and participation at such meetings will build upon long-standing relationships and provide opportunities to forge new partnerships to improve service delivery and communicate resources throughout agricultural communities.

B. Review and Public Comment.

In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

Review & Public Comment Maryland posted the draft Agricultural Outreach Plan on its website for public review and comment. MD Labor also provided a copy of the draft Agricultural Outreach Plan to Telamon Corporation, Maryland's National Farm Worker Jobs Program grantee, and other community partners. MD Labor received no comments.

(C) Data Assessment.

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

Data assessment in Maryland continues to be challenging as the state continuously reports low numbers of MSFWs in the MWE, which makes related quotients and ratios void of meaning. The highest quarter showed 34 MSFWs, though that number included many that proved to be inaccurate after follow up by staff. The system is updated as inaccurate information on individuals is removed after being contacted by staff. MD Labor is committed to providing MSFWs quantitatively proportionate and qualitatively equivalent services to the targeted population. To increase the number of customers accessing AJC services, the State is committed to increasing outreach efforts and partnerships developed, especially within areas that MSFWs may live and work. By engaging partners on a more regular basis to develop relationships with businesses and workers, MD Labor can increase awareness of programs and services available. Creating partnerships with community-based organizations to create a bridge to MSFWs will assist in developing trust among the population. Maryland's challenge is the loss of ~~more~~ farms as farmers retire, or leave farming after closing due to challenges of vagaries of weather, and even the fluctuating market prices for their goods.

(A) Assessment of progress.

The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

Maryland continues to be challenged by the decline in agriculture and MSFWs across the State. As stated earlier, while agriculture remains a multi-billion dollar industry within the State, the economic opportunity for the agricultural community continues to decline. This decline requires constant re-evaluation of the resources that can be dedicated to services to the agricultural community. Another concern is the aging population of farmers, farm workers, and staff in Maryland. In spite of these challenges, Maryland believes that it continues to provide exemplary services to its agricultural community.

(B) State Monitor Advocate.

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The State Monitor Advocate has reviewed this plan and was instrumental in its data collection and composition. The State Monitor Advocate has approved the Plan.

Wagner-Peyser Assurances

The State Plan must include assurances that:

X	1. The Wagner-Peyser Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3));
X	2. If the state has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers;
X	3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;
X	4. If a state chooses to provide certain ES activities without merit staff, it remains incumbent upon SWA officials to carry out the following activities if they arise: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with state and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

a. Aligning of Content Standards

Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

MD Labor adopted the College and Career Readiness Standards (CCRS) Standards for Adults to align with the State's K-12 College and Career Readiness Standards. The standards create a stronger connection between adult education, postsecondary education, and the workplace. By bringing awareness to the critical skills and knowledge expected and required for success in colleges, technical training programs, and employment in the 21st century, the standards guide adult education curriculum and instruction.

To ensure continued alignment, MD Labor:

- Conducts needs assessments to determine CCRS integration into adult education programs,
- Gathers data on effective models of statewide implementation,
- Educates local adult education program leadership and instructional staff on the components of CCRS,
- Creates and delivers professional development and disseminate best practices for implementation in local programs, and
- Provides technical assistance to local adult education programs to determine critical shifts in instruction necessary to align with the CCRS and current high school equivalency assessments.

b. Local Activities

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

Adult Education and Literacy Activities (Section 203 of WIOA)

- Adult education;
- Literacy;
- Workplace adult education and literacy activities;
- Family literacy activities;

- English language acquisition activities;
- Integrated English literacy and civics education;
- Workforce preparation activities; or
- Integrated education and training that—

1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
2. Is for the purpose of educational and career advancement.

Adult Education and Family Literacy Program

Maryland Labor has adopted the College and Career Readiness Standards (CCRS) Standards for Adults to align with the State's K-12 College and Career Readiness Standards. The standards create a stronger connection between adult education, postsecondary education, and the workplace. By bringing awareness to the critical skills and knowledge expected and required for success in colleges, technical training programs, and employment in the 21st century, the standards guide adult education curriculum and instruction.

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- Creates and delivers professional development and disseminate best practices for implementation in local programs, and
- Provides technical assistance to local adult education programs to determine critical shifts in instruction necessary to align with the CCRS and current high school equivalency assessments.

MD Labor's adult education and literacy activities focus on the adult education purposes described in the Adult Education and Family Literacy Act (AEFLA), otherwise referred to as Title II of WIOA.

Title II activities assist eligible adult participants in:

- Becoming literate and obtaining the knowledge and skills necessary for employment and self-sufficiency;
- Supporting their children's educational development;
- Attaining a secondary school diploma;
- Entering postsecondary education or training.

Maryland conducts a competitive application process to award grants to eligible providers, to operate programs that provide adult education and literacy activities. The State manages and coordinates the application process to ensure that service availability is maintained in every jurisdiction based on level of need. Grantees selected as Title II providers for Local Areas must

submit annual non-competitive continuation application documents in order to receive subsequent year funding. The current competitive cycle included an open competition for FY17 and a simplified reapplication process for FY18, FY19, and FY20. An open competition will be held for FY21 AEFLA funds.

Maryland ensures that:

- Adult basic education classes provide instruction for adults with low basic skills and low educational attainment, and help the most vulnerable adults gain access to the services they need;
- Adult secondary education instruction assists students functioning at the adult secondary education level to prepare for a high school diploma through the GED® or the National External Diploma Program (NEDP®) and transition to postsecondary education and employment;
- English language acquisition services assist eligible participants to achieve competence in reading, writing, speaking and comprehension of the English language, as well as the math skills needed to attain a high school credential and successfully transition to postsecondary education and employment;
- All educational programming incorporates evidence-based practices, including the essential components of reading instruction, and contextualized educational content and workforce training are integrated to support participants in achieving their educational and employment goals.

Workplace Adult Education and Literacy Activities

Workplace literacy programs, offered by eligible providers in collaboration with employers or employee organizations, provide opportunities for incumbent workers to strengthen their basic skills. Basic skills include reading, writing, numeracy, oral language, and other skills such as problem solving, teamwork, research, and digital literacy. These programs aim to improve the organizational productivity and performance, while advancing the workers' personal and professional development.

Adult education and literacy providers collaborate with their respective Local Boards, AJC, and area employers and employer organizations to determine local area employment needs and to market workplace literacy programs. Adult education programs offer workplace literacy instruction in basic skills, GED® preparation, English language skills and Integrated English Literacy & Civics Education, to improve the skills and productivity of workers. Approval may be granted for programs to use a portion of instructional funding for workplace literacy instruction and to negotiate payment or in-kind services from a business partner. Workplace education activities are also an allowable activity for WIOA Title I incumbent worker training

Family Literacy Activities

Family literacy activities are designed to take a collaborative two-generation approach to improving economic opportunity for Maryland families, moving them towards economic self-sufficiency. Family literacy activities assist eligible adult parents with one or more children aged

birth through 16 to gain educational skills and credentials, attain employment, and become full partners in the education of their children.

English Language Acquisition Activities

Maryland awards grants to eligible providers for the delivery of English Language instruction that assists adult immigrants and other English language learners to improve reading, writing, speaking and understanding English. Curriculum has been expanded to include basic numeracy and mathematics vocabulary, and to provide transitions to Adult Basic Education classes.

Integrated English Literacy and Civics Education

Through the competitive application process, Maryland awards Section 243 funding grants to eligible providers to carry out Integrated English Literacy and Civics Education (IELCE) instruction. Maryland's adult education population has seen a growth in foreign-born students in recent years and a demand for English language instruction that also addresses employment needs. Grants are available to eligible providers in areas of high immigrant residence to provide specialized curriculum in which English language skills are aligned with Maryland's ESL Content Standards and taught concurrently with instruction on the rights and responsibilities of citizenship and civic participation, understanding American systems of government, education, healthcare, etc. and participation in the workforce. Previous experiences with integrated education and training models demonstrated the importance of workforce preparation for immigrant populations. Integrated instruction that provides a cultural emphasis with focus on understanding the American workplace has assisted students in making a smoother transition to employment. IELCE is offered concurrently with occupational training in a high demand industry leading to potential advancement along a career pathway. Adult education funding will be used to provide the EL/Civics and workforce preparation components. Occupational training is funded through a partner.

Workforce Preparation Activities

Maryland directs resources to maximize the rate at which students successfully transition from adult education programs to postsecondary education or training and employment. The State's implementation of the Integrating Career Awareness (ICA) curriculum and integrated education and training (IET) pilots demonstrated that students need to master preliminary skills in order to succeed in academic and career training. Therefore, the State's WIOA Title II workforce preparation activities, programs, and services are designed to assist participants in acquiring a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in using resources and information, working with others, and navigating systems. Beyond helping participants prepare for the rigors of a college curriculum and the transition to a work environment, Maryland's integrated approach equips them to enter and advance along career pathways by earning stackable industry-recognized and academic credentials that will help them maintain and build a competitive skill set. The State provides professional development and technical assistance to Local Areas to ensure that contextualized workforce preparation activities are included and effectively implemented in curriculum offerings.

Integrated Education and Training

Maryland's Integrated Basic Education and Skills Training (MI-BEST) initiative is based on the renowned Washington State I-BEST model, which integrates adult literacy and occupational skills instruction concurrently with wrap-around supportive services. Early pilot programs demonstrated this model's effectiveness in increasing student retention, and accelerating progress through training. Maryland utilizes labor market intelligence to align occupational training with in-demand occupations or occupational clusters, positioning participants for educational and career advancement.

- The State's adult education program will continue to support the MI-BEST instructional model in partnership with organizations that fund occupational training in high-demand industry sectors, supporting participants in taking their first step along a career pathway.
- Maryland's adult education program leverages connections with the GWDB, the OWD in MD Labor's DWDAL, Local Boards, AJCs, partner State agencies, philanthropic organizations, and other educational organizations to explore funding options to expand the reach and capacity of the MI- BEST initiative.
- Professional development and ongoing technical assistance is provided to local program administrators, teachers and workforce partners on best practices incorporating the experience of the MI-BEST and Accelerated Connections to Employment (ACE) programs including recruitment, training selection, team teaching, support services, employer participation, outcomes, and data collection.
- In FY 2017, adult education providers began collecting data on the number of enrolled adult education learners who have entered into pre-apprenticeships or full apprenticeships. The number is collected quarterly and shared with the Apprenticeship and Training Office at MD Labor.

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

Special Rule

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall

attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

c. Corrections Education and other Education of Institutionalized Individuals.

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II, subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to reentry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

The Maryland Correctional Education program provides incarcerated individuals with high quality services that facilitate successful transition into Maryland's workforce and communities. Correctional Education provides academic, library, occupational, and transitional services to incarcerated students in state correctional institutions. The academic program includes Adult Basic Education, GED® Preparation, Special Education, and English for Speakers of Other Languages. The Library Services Program provides informational, research, and recreational reading services. Transitional classes include life skills, financial literacy, introduction to computers, employment readiness and workforce development, and career exploration. Specific attention is given to academic and transitional students who are under 21 years of age to address their unique needs. Correctional Education prepares incarcerated students to become responsible members of their communities.

Instruction is delivered in 19 state prisons and pre-release centers through the Maryland Correctional Education Program, in partnership with the Maryland DPSCS, and in local detention centers through local adult education grantee programs. Funded programs will deliver academic instruction in adult basic education, adult secondary education and English language acquisition for incarcerated individuals to provide the resources and tools needed for transition to post-secondary education and training opportunities and unsubsidized employment. Within local detention centers, instruction is focused on improving basic academic skills and preparing for high

school equivalency testing and providing the necessary credential for enrolling in post-secondary education or training or entering employment.

The need for Correctional Education in Maryland is well documented. The average reading level of the 18,500 inmates currently in the Maryland prison system is between the 5th and 8th grade. Less than half of these inmates have a high school diploma when they enter the correctional system. Correctional Education provides a comprehensive education program designed to meet the needs of student's at all educational levels.

Pursuant to COMAR 09.37.02, education for certain inmates is a requirement. Within the state Correctional facilities, inmates with more than 18 months to serve on their sentence are required to take adult education classes if they do not have a high school diploma, unless they are exempt due to a medical, developmental, or learning disability. Special education is available for eligible students under the age of 21, supported by an inter-agency partnership. After earning a high school diploma, a number of occupational and transition offerings are available through the support of partner agencies and programs. Offenders are eligible for Correctional Education occupational programs or advanced education through a local partnering college or community college, once they have earned their High School Diploma. Programs are designed to reduce recidivism by supporting incarcerated and formerly incarcerated individuals' access to career pathways opportunities through innovative approaches that support academic achievement and transition to post-secondary training.

Labor, in collaboration with the DPSCS, successfully piloted the use of electronic tablets in academic courses at eight correctional facilities. The tablets are provided by American Prison Data Systems. The tablets provide inmates with secure monitored access to digital education, rehabilitation, and job training and job placement resources in a secure network environment. These tablets will be used to supplement and differentiate instruction. The tablets have been funded through several sources, including: a grant from the Governor's Office of Crime Control and Prevention submitted by the DPSCS, the MSDE Neglected & Delinquent grant, funds from the Adult Education and Literacy Services grant, and Labor state general funds. It is Labor's intention to continue the tablet program with DPSCS, through an expansion within the next year.

Incarcerated individuals may also participate in internships, pre-apprenticeships, and nationally recognized non-union RAs. Maryland's intensive pre-release transition program, in partnership with DPSCS and MSDE's Neglected and Delinquent Grant, prepares individuals for life outside of the institution and provides job readiness in collaboration with workforce partners. During the 2018-19 school year, the Correctional Education Transition Program curriculum is offered at 17 sites by 16 instructors with 2370 participants successfully completing courses during FY19.

The following courses are offered in the Transition Program:

- Personal Assessment and Career Exploration,
- Employment Readiness Workshop,
- Financial Literacy,
- Health and Nutrition,
- Parenting,

- Introduction to Computers,
- Basic Keyboarding,
- Success at Work,
- Workshop Participation,
- Transition Planning for Under 21 Students,
- Life Skills for Reentry,
- Internet Job Search, and
- Reentry and Employment Resource Skills Training.

MD Labor's Office of Correctional Education-Transition and the OWD work together to ensure CE students have information about how to access employment services offered at the AJCs.

Representatives from state workforce programs visit exiting ex-offenders and provide services post release to support their transition to employment. The state supports two state of the art AJCs that provide specialized services to this population. All applicants for sections 225, 231, and 243 funds compete for funds through the same competitive grant process. Applicants have direct and equitable access to apply for grants, and funding opportunities are announced in local newspapers and on the MD Labor website.

The Reentry Employment Opportunities (REO) program provides funding authorized as Research and Evaluation under Section 169, of WIOA for justice-involved youth, young adults, and formerly incarcerated adults. The REO grants are available to organizations with IRS 501(c)(3) non-profit status, including women's and minority organizations; state or local governments; or any Indian and Native American entity eligible for grants under Section 166 of WIOA to develop or expand programs to improve employment opportunities for adults ages 18-24 who have been incarcerated in the youth or adult criminal justice system, and adults ages 25 or older, released from prison or jail within two years of enrollment. Maryland currently has five REO grantees, all operating in Baltimore, City. Goodwill Industries International, Inc.; Living Classrooms Foundation; and Volunteers of America Chesapeake, Inc. are serving adults. Family Health International and Structured Employment Economic Development Corporation are serving young adults.

MD Labor adheres to the same competitive process, including assurances of direct and equitable access mentioned in Subtitle C when competing 225 funds for correctional and other institutional programs though contextualized standards-based instruction and workforce preparation skills to support incarcerated adults' transition post release.

d. Integrated English Literacy and Civics Education Program.

Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries.

The IELCE Program under Section 243 of WIOA was included in the competitive application process for AEFLA funding and adhered to the same requirements of Subtitle C. Maryland upholds

the expectation that alignment of activities is achieved through a planning process prior to submission of applications

The competitive grant application required narrative criteria supporting the need for the IELCE program, based on census data and the proposed industry training areas as specified in state occupational data and the local plan. Additionally, applicants were required to discuss how the plan would integrate with the local workforce and prepare English language learners for placement in unsubsidized employment in high demand industries.

Describe how the State will fund, in accordance with the requirements of title II, subtitle C, an Integrated English Literacy and Civics Education program and how the funds will be used for the program.

Allocated funds are used to provide integrated instruction to adult English language learners, including those who may have professional degrees or certifications in their native countries, that will enable them to develop proficiency in the English language and in the skills needed to become effective parents, workers and citizens in the United States. Instruction includes evidence-based practices that honor cultural diversity and prepares adults for unsubsidized employment in high demand industries and occupations that lead to economic self-sufficiency. English language learners develop language and academic proficiency to prepare them to access post-secondary education.

Selected providers support the English language and civics portion of an integrated education and training program in partnership with an organization that funds the occupational training. Integrated EL/Civics instruction may also be used to provide funding for workplace education programs in partnership with business. Integrated EL/Civics instruction are contextualized to include academic and workplace preparation skills that provide English language learners with the skills needed to succeed in post- secondary education and develop an understanding of the American workplace, regional in-demand industries and occupations that lead to economic self-sufficiency.

Maryland participated in the Literacy Information and Communication Systems English as a Second Language Pro Technical Assistance grant. Funds used to develop instructional practices will enhance the ability of local jurisdictions to effectively prepare English language learners for careers. The best practices developed in this initiative will be shared with all local providers.

The state participates in the Building Opportunities TA project through Manhattan Strategy Group in partnership with one of the largest local programs. The Adult Education Office has provided ongoing technical assistance to the programs receiving funding through Section 243 (17 in FY 2018 and 13 in FY 2019) Initial assistance was provided with regard to program start-up, recruitment, screening, and initiating partnerships. Additional clarification on funding use was provided as grantees developed plans to deliver programming. Technical assistance on building partnerships and developing IETs will continue to be the focus of professional learning.

Funded providers are required to submit plans that describe the integration of activities and services with local workforce development partners in subsequent renewal years.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Programs receiving funds under WIOA Section 243, must implement integrated English literacy and civics education activities to help English language learners achieve competence in English. Contextualized instruction is included on the rights and responsibilities of citizenship, naturalization procedures, civic participation, and United States history and government to help such learners acquire the skills and knowledge to become active and informed parents, workers and community members. Required components of IELCE services are as follows:

1. English Language Acquisition (speaking and comprehension) and
2. Literacy (reading and writing) and
3. Civics education (the rights and responsibilities of citizenship and civic participation)

IELCE includes English language instruction, including speaking, reading, writing and comprehension skills in English and Civics education that is based on the best practices and are aligned with the English Language Proficiency Standards for Adult Education. Applicants must:

1. Explain how the delivery of services will allow adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function more effectively; and
2. Describe how the civics education component of IELCE will be offered to participants and how will participants engage in activities and lessons that increase their awareness of rights and responsibilities of citizenship and civic participation, U.S. History and Government?

In addition, programs receiving IELCE funds under Section 243 of WIOA must ensure that students in this Program have access to integrated education and training (IET). Access to an IET means that students who are in Section 243 funded services are also able to attend an IET course, if interested; however, students enrolled in the IELCE program are not required to participate in such service.

IELCE provides education services to English language learners who are adults, including professionals with degrees and credentials in their native countries that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers and citizens in the United States. Such services must include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation. NRS levels are not the determiners for student eligibility. Non-native English speakers, who are receiving ELA instruction and civics instruction as an integrated component of the IELCE, are still eligible to participate in the IELCE/IET even though they may have tested out of all six ELL levels in NRS.

The State Plan has placed priority on alignment with Maryland's ESL content standards taught concurrently with instruction on the rights and responsibilities of citizenship and civic participation, understanding the American systems of government, education, healthcare and the American workplace.

Applicants will propose a model that ensures provision of all required components in compliance with WIOA regulations. In cases in which the grant recipient does not provide all components itself, it will be responsible for ensuring full integration of all activities. Furthermore, local providers must provide annual deliverables include 1) data integrity reports; 2) payment point summaries; 3) fiscal reports; 4) professional development, technology, and distance learning plans; 5) and local assessment plan. As such, local providers must continue to demonstrate program effectiveness in order to reapply for continued funding.

4. Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

Programs receiving IELCE funds under Section 243 of WIOA must ensure that students in this Program have access to integrated education and training (IET). Access to an IET means that students who are in Section 243 funded services are also able to attend an IET course, if interested; however, students enrolled in the IELCE program are not required to participate in such service.

Guidance provided to applicants that IET(s) choice(s) must employ current Local Board or Labor Market Information (LMI). The IET should also be the first step in a career pathway, which leads to recognized credentials. Applicants must address 1) How does the IET align intended outcomes to employer needs and 2) identify the occupational sector, entry-level positions, initial industry certifications, and degree options in pathway.

In addition, while the use of Title II Adult Education funds to support the IET component is not prohibited, it is not deemed best practice. It is strongly recommended that occupational training be funded through a partner. Applicants must describe how the IET(s) will be funded and who will provide resources or funding to support the program.

e. State Leadership.

Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.

Alignment of Adult Education and Literacy Activities with other core programs and One Stop partners

Stakeholder input on the State's adult educational programming is regularly sought from WIOA partners and community members through the *Benchmarks of Success* committees. The State also convened the Adult Education and Career Pathways work group in 2016, tasking it with developing policy and creating and implementing a statewide career pathways system that supports

the progress of adult learners across the education and employment continuum to achieve economic self-sufficiency.

Adult Education participates on WIOA workgroups promoting agency alignment, professional development, and policy as well as the Skilled Immigrant Task Force. Adult education assists with planning, facilitating and presenting at the statewide WIOA Convenings.

Maryland has made significant progress in improving the coordination and alignment of initial assessments of literacy, numeracy and English language skills and the selection of testing instruments to facilitate co-enrollment and referrals between WIOA Title I and Title II programs. MD Labor's Title I and II programs have jointly issued the Basic Education Skills and English Language Assessments Policy to establish unified standards for the following programs:

- WIOA Title I Adult Program;
- WIOA Title I Dislocated Worker Program;
- WIOA Title I Youth Program;
- WIOA Title II Adult Education & Family Literacy Act Program; and
- Trade Adjustment Assistance for Workers Program (Trade Program).

Local Areas were required to submit plans for aligning assessment practices in their local plans.

The Establishment of High Quality Professional Development to Improve Instruction

High quality professional development programs are vital to ensuring that Maryland's adult learners obtain the best instruction possible. To improve the instruction provided pursuant to local activities required under Section 231(b) of WIOA, including instruction incorporating the essential components of reading instruction as such components relate to adults, instruction related to the specific needs of adult learners and dissemination of information about models and promising practices related to such programs, Maryland's Adult Education programming:

- Allocates resources to promote the development and implementation of statewide, regional and local training activities for adult education practitioners to improve academic instruction, digital literacy and transitions to post-secondary education and employment;
- Conducts an annual statewide needs assessment to provide the State agency with input from the provider network as well as other stakeholders;
- Requires adult education teachers to receive professional development that will provide them with the tools to meet the new challenges in daily practice including college and career readiness standards for adult education and opportunities to learn more about the careers for which they are preparing their students; and
- Requires administrators of local provider programs receive professional development on the best practices for management and collaboration.

Provision of Technical Assistance

Maryland provides technical assistance to eligible providers of adult education and literacy activities receiving funds under Title II, including:

- The development and dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs, distance education, and staff training; the role of eligible providers as an AJC partner to provide access to employment, education, and training services; and
- Assistance in the use of technology, including for staff training, to eligible providers, especially the use of technology to improve system efficiencies. The adult education program will develop and maintain repository of information on research-based and best practices for adult literacy instruction and disseminate findings to local programs.

The State also:

- Maintains a list of adult education providers, including all grant-required leadership positions for disseminating information about adult education;
- Communicates regularly through a monthly webinar;
- Conducts in-person and virtual positive-specific meetings to highlight best practices; and
- Disseminates information through the MD Labor website and other virtual platforms.

Monitoring and Evaluation

Monitoring and evaluation is important to ensure the quality of, and the improvement in, adult education and literacy activities and the dissemination of information about models and proven or promising practices within the State. Maryland will ensure the collection and reporting of valid and reliable data consistent with the current state and federal data collection guidelines and requirements through:

- Maintaining the use of the LACES Management Information System database;
- Providing training and technical assistance to all agencies using the system;
- Conducting annual on-site monitoring of funded adult education program providers;
- Providing feedback and information on improvement strategies/models; and
- Conducting other activities necessary to ensure compliance with federal and state requirements and to determine the effectiveness of the program.

Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable.

The development and implementation of technology applications, translation technology or distance education including professional development to support the use of instructional technology.

A Distance Learning Workgroup was convened to make recommendations to expand the scope of distance learning in Maryland in order to meet the needs of all students. Changes were made to the Distance Learning Policy to allow programs to count proxy hours and implement changes in curriculum to accommodate blended learning. Members of the group included staff from adult

education programs and AJCs. The revised Distance Learning Policy is a component of the Maryland Basic Education Skills & English Language Assessment Policy.

Until the recent change to the Distance Learning Policy, Maryland i-Pathways program was the only distance learning opportunity for ABE levels 5-6. \Educational technology has opened new avenues for learning and Maryland embraces the ability of educational technology to expand access and availability of learning for adult learners. Recent shifts in Maryland's learner population created a need for online curriculum to support the needs of the growing ELL population as well as lower skilled adults. Maryland has made a concerted effort to expand blended and online learning opportunities for all learners.

Technology skills and access vary greatly among local provider agencies. The competitive grant application required that applicants describe use of technology, services and delivery systems including digital learning, in a manner sufficient to increase the amount and quality of learning and improved performance outcomes and develop a three-year technology plan.

Realizing the need for increased knowledge of distance and blended learning opportunities, Maryland joined the IDEAL Consortium in FY18. The IDEAL Consortium helps member states establish quality distance and blended learning programs by offering professional development, providing technical support, and facilitating a network of education leaders engaged implementing distance and blended learning. Through the partnership with World Ed, Maryland offered training in online and blended program planning and implementation (IDEAL 101) to ten programs. In FY19, a second cohort of nine local programs participated in IDEAL 101.

These two training opportunities included an online course to raise awareness of and proficiency in creating effective online learning opportunities. These 19 participants then created a site plan and piloted blended and online learning opportunities at their sites, while being supported through a series of implementation webinars. Additional professional development will be offered in conjunction with the IDEAL Consortium.

The state is moving forward with plans to offer a virtual new instructor professional development from a centralized operation. This professional development will focus on understanding the adult learner, federal and state regulations for program operations and assessment, and instructional. The initiative benefits local adult education providers by creating centralized content to support the onboarding of new adult education instructors.

Content and Models for Integrated Education and Training and Career Pathways

In late 2017, Maryland committed $1,000,000 of WIOA funding to invest in demonstration projects that support career pathway initiatives. The grant program, which is the first of its kind in Maryland, solicited innovative proposals from Local Areas to develop demonstration projects that increase training and employment opportunities for Marylanders lacking high school diplomas. Grant applicants were encouraged to prepare proposals for pilot interventions involving proven strategies, such as (but not limited to) pre-apprenticeship training, English Language Acquisition, distance learning, bridge programming, and pathways to employment for out-of-school youth.

Community partners and adult education providers were encouraged to partner with Local Areas to participate in the opportunity.

Historically, the several programs, including the largest community colleges received funding through MD Labor and a private foundation to implement IETs through Maryland's MI-BEST program. A Workforce Innovation Grant allowed the colleges to continue to develop this program in partnership with their workforce partners. For a number of providers, additional professional development will be required to develop and implement IET programs. IELCE funding and WIOA rules that allow for a broader use of AEFLA funding have facilitated some successful projects, however, the state encourages collaboration to leverage funding.

f. Assessing Quality.

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

Maryland assesses the quality of adult education providers using a combined desk and onsite monitoring approach. Each grantee is assigned to an Adult Education Program Specialist whose role is to provide monitoring and technical assistance to the grantees. Grantees analyze their program progress on a trimester basis and submit trimester data review reports to the Specialist. The reports include an analysis of data on enrollment, contact hours, student retention, and progress toward meeting performance goals. Specialists review the reports and provide follow up to the grantees. Technical assistance is offered as needed and professional development is recommended where indicated.

All AEFLA funded programs are required to review performance annually, identify any challenges that prevented meeting performance targets, and propose strategies to address these challenges. Proposals are reviewed by State Staff who provide technical assistance and make recommendations for additional strategies and professional development. Low performing programs may be assigned to a mentor from a high performing program. A Performance Based Funding formula provides a system to incentivize high quality programming using available instructional funding.

The LACES data system captures information on student demographics, enrollment and student progress and meets the requirements of the National Reporting System. Annual sampling of data from LACES is verified in onsite student records to ensure the validity of data entered at the program level. In the event that errors or inconsistencies are found, programs submit a Corrective Action Plan. Subsequent monitoring and technical assistance from state staff is provided to ensure that the required changes are implemented. Program leadership members work as a team to ensure compliance with the Data Quality Checklist, and meet with staff to review new procedures. A fiscal monitoring is conducted for all grantees using a risk analysis model. All programs are monitored over a three-year cycle; however, those with risk factors are prioritized for immediate review.

State staff regularly meet onsite with key local staff, provide timely technical assistance and ensure that state and federal regulations are adhered to in program practice. Assessing the quality of professional learning at both the state and local level supports high quality instruction and is essential to the operation of high professional development programs. The AELS office is responsible for implementing, and maintaining standards for professional learning and using standards to assess and evaluate state funded professional development for adult education.

The tools that AELS staff employ to ensure that professional development programing is addressing the targets for improving instruction in the local activities {required under section 231(b)} are based on Guskey's model for Five Critical Levels of Professional Development Evaluation. The five levels include, but are not limited to the following: annual needs assessment, state and local evaluation of materials, presentation and objective completion, workgroups for feedback and information in the field, state and local observation (program operation and instruction) and program outcome data.

Local programs submit a plan for professional development with their grant application detailing selection criteria, delivery method, target audience and method for evaluation. Documentation of local professional development is submitted and maintained on the state online file sharing system and reviewed by state staff. Documentation for all professional learning activities at the state and local level is maintained to ensure that programs are in compliance with all state required professional development. The State also serves as a resource for information on best practices, program models and uses a variety of methods to disseminate information. Aside from tradition email distribution, AELS has a centralized online repository for programs to access resources and information, as well as a monthly conference call or Webinar to communicate promising practices, activities and initiatives.

In evaluating the quality of professional development programs it is important to collect data using a variety of tools both quantitative and qualitative. Feedback from the State delivered foundation trainings and State facilitated sharing sessions for local programs' leadership team members provide data for evaluating the effectiveness of professional development activities.

1. An emphasis on professional learning will be placed on local adult education providers incorporating the research-based components of phonemic awareness, system phonics, fluency, and reading comprehension. Reading test scores will be analyzed and evaluated at the state and local level to determine the impact, quality and need for changes in professional learning and adjustments will be made according to the results.

2. Adult learning theory and the needs of adult learners will be the foundation of local adult education instruction. Professional learning activities will be planned and implemented to assist local programs in designing instruction with a basis in Knowles principles of andragogy, the learning needs specific to adult learners: need to be involved in planning and evaluation of instruction, experience as the basis for learning activities, immediate relevance and impact on work and life and problem-centered. Adult learner goal attainment and student education gain will be used to measure if students' involvement in planning and evaluation has been incorporated in the classroom. Additionally those measures are also used to address the instructor's practice of designing instruction that is relevant to the

student's life and work and based on students life experiences. Classroom observation can also demonstrate whether instructors using student experience as the basis for learning activities and is putting problem-centered instruction into practice. Data collected from observation, student goal attainment and educational gain will be used to analyze need and make changes and improvements future professional learning activities.

3. Personnel both paid and volunteers are afforded foundation professional learning activities in accordance with state required topics/subject areas. These activities include but are not limited to, assessment, College and Career Readiness standards, ESL content standards, essential components of reading, and numeracy. Instructors will be prepared in these core areas in order to implement instruction to support student educational gain and goal attainment. Program and State staff review program data to evaluate the pre/post-test match, as well as student test score gains in reading, math, English language skills to evaluate the quality of the activities, this data will be used for continuous improvement for the foundation professional learning activities.

4. AELS disseminates information on promising practices and instructional models to local programs and stakeholders in adult education using a variety of methods. Professional learning sharing sessions, leadership team workgroups, meetings, email, as well as centralized online repository help programs access current adult education programing and instruction information. All meetings and sharing sessions are evaluated not only by participant evaluation but also feedback and observation on models or practices that have been implemented as a result of the receiving the information. The results of the evaluation and observations determine the effectiveness of the dissemination processes, adjustments are made as necessary to ensure that all relevant information is being distributed efficiently and effectively.

Adult Education and Family Literacy Act Program Certifications and Assurances

X	1. The plan is submitted by the State agency that is eligible to submit the plan.
X	2. The State agency has authority under State law to perform the functions of the State under the program.
X	3. The State legally may carry out each provision of the plan.
X	4. All provisions of the plan are consistent with State law.
X	5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan.
X	6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan.
X	7. The agency that is submitting the plan has adopted or otherwise formally approved the plan.
X	8. The plan is the basis for State operation and administration of the program.

Certification Regarding Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

3. The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Applicant's Organization:	**Maryland Department of Labor**
Full Name of Authorized Representative:	**Tiffany Robinson**
Title of Authorized Representative	**Secretary**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(http://www2.ed.gov/fund/grant/apply/appforms/appforms.html).
If applicable, please print, sign, and email to OCTAE_MAT@ed.gov

Assurances

The State Plan must include assurances that:

X	1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions).
X	2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA.
X	3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA.
X	4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities;
X	5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and
X	6. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.
X	7. The eligible agency agrees that in expending funds made available under title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).

Section 427 of the General Education Provisions Act (GEPA)

Instructions: Describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the following instructions.

Section 427 requires each applicant for funds to include in the application a description of the steps the applicant proposes to take to ensure equitable access to and participation in its Federally-assisted program for students, teachers, and other program beneficiaries with special needs. All applicants for competitive awards must include information in their applications to address this provision in order to receive funding. Applications must provide a description of the ability of the organization to serve eligible individuals with physical and mental disabilities including those individuals with learning disabilities. They must share plans to collaborate with agencies, partners, and/or other services that assist in supporting and serving eligible individuals with disabilities and describe how the program's policies and procedures comply with the Maryland State Plan for the WIOA and the Americans with Disabilities Act (ADA 1990). The competitive grant application also requires applicants to include the organization's GEPA statement.

Vocational Rehabilitation

The VR Services Portion of the Unified or Combined State Plan 13 must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by WIOA:

(a) Input of state Rehabilitation Council.

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

(1) input provided by the state Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

The MSDE's DORS is a key component of Maryland's WIOA system. DORS offers programs and services that help students, youth, and adults with significant disabilities achieve their goals of postsecondary education, training, and careers. DORS administers the public VR program through the following branches:

- The Office of Field Services prepares people with disabilities to become employed or assists them in maintaining their employment. VR counselors located in offices throughout Maryland provide or arrange for services that may include career counseling, Assistive Technology, vocational training, and/or job placement assistance. The Office of Field Services also provides Pre-Employment Transition Services to high school students with

significant disabilities, to assist them in preparing for a seamless transition from high school to postsecondary education, vocational training, and employment.

- The Office for Blindness and Vision Services specializes in helping people whose primary disability is blindness or vision loss go to work and remain independent in their homes and communities. The Office for Blindness and Vision Services also provides Pre-Employment Transition Services to high school students with significant visual disabilities. Finally, the office oversees the Maryland Business Enterprise Program for the Blind. This program prepares individuals who are legally blind to operate vending, gift, or food service businesses in public facilities.
- The Workforce and Technology Center is a comprehensive rehabilitation facility that offers career assessment services, career and skills training, job placement assistance, Assistive Technology services, Pre-Employment Transition Services, and other medical and support services to consumers who are referred from the Office of Field Services and the Office for Blindness and Vision Services.

Input and Recommendations by the State Rehabilitation Council

The Maryland State Rehabilitation Council (MSRC) was established under the 1992 Amendments to the Rehabilitation Act. The Council is made up of individuals who are interested in the success of public VR programs. Maryland State Rehabilitation Council members are appointed by the Governor and include representatives from education, rehabilitation, employment, industry, and consumer advocacy groups.

The Council reviews, analyzes, and advises DORS about issues, such as service provision, eligibility, strategic planning, and consumer satisfaction. MSRC members meet quarterly, perform extensive committee work, and help with informal consultation. The MSRC provides year-round formal and informal consultation to DORS, particularly at scheduled quarterly full Council meetings, at committee meetings, and during an annual DORS/MSRC executive planning meeting. Meeting minutes' document discussions and recommendations. Additionally, DORS provided members of the MSRC Policy and Planning Committee with the following documents, so the committee could offer formal recommendations for the agency's strategic planning needs:

- MSRC FY17 and 2018 Annual Reports,
- DORS FY18 and 2019 Outcomes,
- Performance Year 17 and 18 ETA 9169 report ,
- Consumer satisfaction survey results from the Office of Field Services and the Office for Blindness and Vision Services,
- DORS/MSRC 2018 and 2019 Public Meetings Report, and
- DORS 2019 Comprehensive statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland.

During FYs 2018 and 2019, MSRC played an active role in many activities with and in support of DORS. These included the following:

- Advocating for increased awareness of public VR programs and the VR services portion of the WIOA System outlined in the Maryland Combined State Plan, including educating

stakeholders about the impact of the DORS waiting list on people with significant disabilities, pre-employment transition services to students with disabilities, and enhancing collaboration with workforce partners to promote the competitive integrated employment of individuals with significant disabilities;
- Facilitating statewide public meetings;
- Providing consultation and review for consumer satisfaction surveys;
- Providing review and analysis of Client Assistance Program outcomes and issues;
- Reviewing and analyzing a DORS employment and retention study;
- Contacting members of Maryland's General Assembly to provide information concerning the DORS waiting list, the need to address the needs of underserved populations, and to thank them for their continuing support of the public VR program;
- Actively participating in DORS strategic and annual planning process meetings;
- Expressed continued concern in the MSRC Annual Report regarding the lengthy waiting list of DORS consumers with significant disabilities on the waiting list for services;
- Expressed concerns of the impact of Pre-Employment Transitioning Services has had on DORS's ability to reduce its waiting list.
- Participated in, the Council of state Administrators of VR, the National Council of State Agencies for the Blind, and the National Coalition of state Rehabilitation Councils; and
- Completing the DORS 2019 Comprehensive Statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland.

Recommendations from the Maryland State Rehabilitation Council

The Maryland State Rehabilitation Council takes an active and visible role in how Maryland's public VR program is administered through a variety of activities, including:

- Reviewing, analyzing, and advising DORS regarding performance of its responsibilities and quality of its services;
- Ensuring that the needs of individuals with disabilities are identified and addressed by state and federal legislators, service providers, employers, and the community;
- Collaborating with organizations and other state councils to promote services to underserved and unserved populations; and
- Developing and reviewing state goals and priorities and assisting in the preparation of Maryland's annual State Plan for VR.
- Provides feedback and input into DORS policies that governs the delivery of services.

The Council presented the following recommendations to DORS following the comprehensive 2019 Statewide Needs Assessment:

1. The Council recommends that DORS continue to monitor, strengthen, and foster relationships with MD Labor, Department of Health, and MSDE. Continue to explore data sharing strategies to demonstrate collaboration for the provision of services, and to ensure a smooth referral process between partners.

2. The Council recommends that DORS evaluate the staffing needs within DORS, with a focus on the number of full-time VR counselor positions across the state to ensure an

effective and manageable caseload distribution and to ensure that there is a sufficient number of VR counselors who provide services to transitioning youth and students with disabilities to accommodate the anticipated increase in the number of student referrals to DORS VR and Pre-ETS programs.

3. The Council recommends that DORS provide continued opportunities for mutual training and collaboration between DORS and other workforce programs.

4. The Council recommends that DORS enhance and expand the provision of Pre-ETS services statewide to include: increase the number of Pre-ETS services for individuals who are Deaf or Hard of Hearing, Blind or Visually Impaired, and Intellectually or Developmentally Disabled; expand outreach to Pre-ETS students and families whose first language is not English; align staffing and caseload assignments for better collaboration with local education agencies and other education systems; ensure consistent interpretation and implementation of policies and procedures and quality assurance standards; and improve cooperation between DORS Pre-ETS VR counselors and school staff monitoring 504 plans as DORS has limited access to students with 504 plans. Additional comments suggest that DORS consider refining its Pre-ETS program proposal process to provide more structure/definition of service expectations.

5. The Council recommends that DORS improve information and referral services to AJC and other workforce partners for individuals on the DORS waiting list, especially Social Security beneficiaries who may benefit from employment network services while waiting for DORS services to be available. Referral information should pertain to the closest and most relevant employment network for the individual.

6. The Council recommends that DORS improve the variety of employment opportunities available to DORS consumers by increasing staff knowledge of current labor market trends, collaborating with community colleges to develop Pre-Apprenticeships and RA programs for high growth industries in Maryland. Expand and continue the collaboration with the Maryland Apprenticeship Think Tank to increase the number of individuals with disabilities participating in youth Pre-Apprenticeship and RA programs, outreach to WIOA partners, and identify community colleges and employers to provide training for a variety of apprenticeship programs for individuals with disabilities.

7. The Council recommends that DORS re-establish the Agency's Multicultural Access Committee to ensure equal access for minorities to DORS services. This committee needs to ensure that the resources needed by DORS field staff have been developed and implemented.

8. The Council recommends that DORS promote comprehensive rehabilitation services for Deaf-Blind individuals by reconvening the Deaf-Blind workgroup and filling the vacant Deaf-Blind specialist position to collaborate closely with grassroots organizations, community partners, advocacy groups and the Helen Keller National Center, ensuring that Deaf-Blindness remains a priority for the Agency. Services should focus on statewide

Support Services Program (SSP); employment services, and employer education and awareness.

9. The Council recommends that DORS continue to examine the updated DORS policy regarding supported employment with a focus on the newly introduced supported employment opportunities for individuals without access to long-term funding for extended supported employment services, and the impact of supported employment intensive job coaching supports focused on achieving job stability and retention.

10. The Council recommends that DORS expand employment services for individuals who are Deaf or Hard of Hearing by developing enhanced relationships with businesses. Employment specialists and VR counselors serving Deaf and Hard-of-Hearing consumers should have an employment toolbox which contains information on how to approach businesses and develop working relationships.

11. The Council recommends that DORS should explore a rate increase for DORS-approved community rehabilitation programs.

12. The Council recommends that DORS enhance relationships with community rehabilitation programs for increased collaboration in the following areas: knowledge and understanding of DORS policies and procedures; understanding benefits counseling and when it is to be provided; communication; and timely submission of documents, reports, and invoices.

13. Continue to work with 14c certificate holders to explore the number of individuals remaining in sub-minimum wage, how that may impact the number of referrals to DORS, and the barriers that 14c certificate holders are experiencing in moving individuals off 14c work sites. Additional comments recommend that DORS place increased emphasis upon out-placement for those individuals working on set-aside contracts with respect to DDA timelines.

DORS supports these recommendations and continues to be appreciative of the expertise of the individuals who comprise the Maryland State Rehabilitation Council. Their passion for and commitment to supporting individuals with disabilities is unmatched. DORS values their contributions of time and knowledge.

(2) the Designated State unit's response to the Council's input and recommendations; and

DORS Responses to the Council's Input and Recommendations

1. DORS will continue to monitor, strengthen, and foster relationships with the Departments of Labor, Health, and the MSDE. DORS is currently exploring data sharing strategies to demonstrate collaboration for the provision of services, and to ensure a smooth referral process between partners.

2. DORS will be evaluating the staffing needs within agency, with a focus on the number of full-time VR counselor positions across the state. DORS will use data analytics to ensure

an effective and manageable caseload distribution and to ensure that there is a sufficient number of VR counselors who provide services to transitioning youth and students with disabilities to accommodate the anticipated increase in the number of student referrals to DORS VR and Pre-ETS programs.

3. DORS will continue to explore opportunities for mutual training and collaboration between DORS and other workforce programs. DORS in conjunction with core workforce partners will look to leverage the State's new Chief Learning Officer for Workforce. In addition, will work with other sister agencies to develop co-training opportunities for staff.

4. DORS will continue to enhance and expand the provision of Pre-ETS services statewide. Explore opportunities to increase the number of Pre-ETS services for individuals who are Deaf or Hard of Hearing, Blind or Visually Impaired, and Intellectually or Developmentally Disabled. Work with local organizations to expand Pre-ETS students and families whose first language is not English. Will work with the Office of Field Service and the Office of Blindness and Vision Services to align staffing for better collaboration with local education agencies and other education systems. Will work to provide consistent interpretation and implementation of policies and procedures and quality assurance standards. DORS will work with the MSDE on the Local School System Agreements to help improve cooperation between DORS Pre-ETS VR counselors and school staff to assist students on an IEP and/or 504 plans. Finally, DORS will continue to refine its Pre-ETS program proposal process to provide more structure/definition of service expectations.

5. DORS is working with its WIOA partners to improve information and referral services to AJCs and other workforce partners for individuals on the DORS waiting list, including Social Security beneficiaries. DORS will review its Referral information to include information about the closest AJC or employment network for the Social Security Beneficiaries.

6. DORS will work with staff to expand their knowledge of State and local labor market trends. DORS will continue its collaboration with the Department of Labor to expand the opportunities for individuals with disabilities to participate for Pre-Apprenticeship and RA programs in the State.

7. DORS agrees to re-establish the Agency's Multicultural Access Committee to ensure equal access for minorities to DORS services and that resources are developed for DORS staff.

8. DORS will work to reestablish the Deaf-Blind workgroup once the vacancy for the Deaf-Blind specialist is filled. The workgroup should focus on the statewide Support Services Program (SSP); employment services, and employer education and awareness.

9. DORS will continue to examine DORS policy regarding supported employment, including the use of natural supports for individuals without access to long-term funding for extended supported employment services.

10. DORS will continue to expand employment services for individuals who are Deaf or Hard of Hearing by developing enhanced relationships with businesses. DORs will develop

training for Employment specialists and VR counselors serving Deaf and Hard-of-Hearing consumers on how to approach businesses and develop working relationships.

11. DORS will be exploring a rate increase for DORS-approved community rehabilitation programs.

12. DORS will be looking to enhance relationships with community rehabilitation programs for increased collaboration through the reintroduction of the Community Rehabilitation Program Advisory Board, with a goal to increase staff's knowledge both at DORS as well as the Community Rehabilitation Programs (CRPs) in a number of areas that are important to both groups.

13. DORS will continue to work with the remaining 14c certificate holders to explore the employment opportunities for those individuals who are transitioning out of sub-minimum wage positions to competitive integrated employment, with an increased emphasis upon out-placement for those individuals working on set-aside contracts with respect to DDA timelines.

(3) the designated State unit's explanations for rejecting any of the Council's input or recommendations.

The agency does not reject any of the recommendations.

(b) Request for Waiver of Statewideness.

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:
(1) a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;
(2) the designated State unit will approve each proposed service before it is put into effect; and
(3) requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

The Maryland DORS has not requested a waiver of statewideness.

(c) Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:
(1) federal, state, and local agencies and programs;

While DORS is committed to working collaboratively with its WIOA partners, it recognizes the importance of maintaining other strong partnerships to provide exceptional customer service to businesses and individuals with disabilities. Cooperation with private and nonprofit service

agencies, related government agencies, and other professional organizations has long been a cornerstone of public VR in Maryland. Such collaborations help to overcome the multiple complex barriers that confront people with disabilities who want to work or stay independent in their communities.

The Division maintains cooperative agreements, a Memorandum of Understanding and membership on Interagency Councils and Local Committees, and other collaborative initiatives and projects with agencies and organizations outside the workforce development system.

Cooperative Agreements

- Department of Health:
    - **Behavioral Health Administration** – This cooperative agreement, most recently updated effective December 2011, addresses referrals between agencies and specifies shared responsibilities for funding of supported employment, as well as cross-training for staff. The current agreement is being updated to reflect the changes as a result of WIOA as well within the Behavioral Health Administration.
    - **Developmental Disabilities Administration** – MSDE, DORS, and the Maryland Department of Health, Developmental Disabilities Administration updated and approved the Cooperative Agreement, Employment Services in June 2018. It focuses on implementation of Employment First in Maryland and addresses referral between agencies and specifies shared responsibilities for funding of supported employment. It also describes cross-training activities and other collaborative efforts.
- Maryland Association of Student and Financial Aid Administrators - This cooperative agreement specifies the process for defining unmet financial need for higher education and the requirements for PELL Grant and scholarship applications. It also outlines the process for sharing information to determine the amount of assistance DORS can provide to a student for tuition and other educational costs.
- Workers' Compensation Commission– This agreement describes the referral process and the procedure for submitting rehabilitation plans to the Commission to determine if costs will be covered by an insurer.
- MSDE– The Intra-Agency Cooperative Agreement on Transitioning specifies areas of cooperation among the Divisions of Student, Family, and School Support Services; Early Intervention and Special Education Services; Career and College Readiness; and Rehabilitation Services specific to transitioning students and youth with disabilities.

MOU

- A Memorandum of Understanding exists between DORS, the Department of Health's Behavioral Health Administration, and the Developmental Disabilities Administration that authorizes the issuance of vouchers for the Maryland Disability Employment Tax Credit. This Memorandum of Understanding remains in effect.

Interagency Councils and Local Committees

DORS maintains an active presence on numerous statewide interagency councils within and beyond the WIOA workforce system.

Within the WIOA System, DORS actively participates on the following committees and groups:

- GWDB Interagency Committee;
- Maryland Adult Learning Advisory Council;
- The state's WIOA Work Groups; and
- The WIOA Alignment Group.

Beyond the WIOA System, DORS regional and field offices, the Workforce and Technology Center, and the Office for Blindness and Vision Services also maintain active working relationships with many local committees and initiatives.

Statewide:

- Maryland Statewide Independent Living Council
- Maryland Developmental Disabilities Council
- Maryland Mental Health Advisory Board
- Department of Health, Traumatic Brain Injury Advisory Committee
- Interagency Transition Council for Youth with Disabilities Under Executive Order 01.01.2007.13 (Interagency State Plan for Transitioning Students with Disabilities)
- The Maryland Coordinating Committee for Human Services Transportation
- Department of Health/Developmental Disabilities Administration, Maryland Department of Disabilities Employment First, The Maryland Library for the Blind, and Physically Handicapped Advisory Board
- Local Coordinating Councils
- Maryland Special Education state Advisory Committee

Other Collaborative Initiatives and Projects

DORS collaborates with the Department of Disabilities, a cabinet level agency, and is represented on the following committees/workgroups:

- SUCCESS - postsecondary education for individuals with intellectual disabilities;
- The annual Americans with Disabilities Act Celebration committee; and
- Meetings between the Maryland Department of Disabilities Secretary and DORS Director to discuss state and national disability topics, project updates, etc.

DORS supports/collaborates with Maryland Department of Disabilities during the legislative session on issues of importance to the disability community.

All committees bring together a variety of Maryland agencies that supply programs and services to individuals with disabilities.

There are also agreements with the Maryland School for the Blind and the Maryland School for the Deaf covering referral procedures, evaluation, individualized planning, and follow-up. The Office for Blindness and Vision Services (OBVS) sponsors summer programs with the Maryland School for the Blind at the Workforce and Technology Center.

Other Collaborations

- Supported Business Enterprise — DORS works with the Developmental Disabilities Administration and the Behavioral Health Administration to assure that self-employment is a viable career option for individuals with cognitive and psychiatric disabilities. Supported Business Enterprise is a form of self-employment for individuals who, because of their disability, require supports to operate their business. While the consumer must perform a core function of the business, extended service providers support certain activities and related functions to assure successful operation. All businesses operate within an integrated employment setting.
- Blind Industries and Services of Maryland — DORS provides state-aided grant for provision of support services to individuals with vision loss, including rehabilitation teaching, assistive aids and devices, and Braille production.
- Community Colleges - Autism Supports — DORS has agreements with certain Maryland Community Colleges for designated Workforce and Technology Center staff to work collaboratively on their campuses with the college Disability Support Services staff to provide supports required by students with Autism spectrum disabilities. DORS has expanded the Pathways program to include Anne Arundel Community College, Montgomery College, Howard Community College, and the three campus sites of Community College of Baltimore County. With the expansion of this program, a new position will be added to the staff at WTC, which will offer the opportunity for expansion to other Maryland colleges.
- Reaching Independence through Self-Employment (RISE) Program — the RISE Program has been a program of DORS since 1997, with program training, guidance, and support services. Its mission is to present self-employment as a realistic and viable vocational option to individuals with significant disabilities who are eligible for DORS services. RISE Program staff work with individuals and their families, rehabilitation professionals, and the business community to facilitate and encourage the successful launch and operation of consumer-owned businesses. DORS will be expanding the RISE program to have a focus on Supported Self-Employment.
- Maryland Work-Based Learning Collaborative (Way 2 Work) — DORS, in collaboration with University of Maryland, currently manages a 5-year demonstration grant awarded by RSA for LSS to provide work-based learning experiences for students receiving pre-employment transition services. Funding awards for two-year implementation periods have been granted to LSSs in four counties, and DORS will grant funding for up to four more LSSs in February 2018.

(2) State programs carried out under section 4 of the Assistive Technology Act of 1998;

- The Maryland Technology Assistance Program (TAP) is a program of the Maryland Department of Disabilities. The mission of the program is to enhance the lives of

Marylanders with disabilities and their families by helping support access to Assistive Technology devices and services. The program assists people with disabilities in obtaining assistive devices and remaining independent in their communities by providing services, such as information and referral, Assistive Technology demonstrations, option to borrow assistive technologies for a limited time, Assistive Technology reuse program, and low interest rate loans for purchase of Assistive Technology devices.

- The Maryland Technology Assistance Program and DORS partner in demonstrating Assistive Technology devices.
- DORS serves as a member of the Maryland TAP Advisory Committee.
- Maryland TAP and DORS are members of the Governor's Interagency Transition Council for Youth with Disabilities.
- DORS partners with Maryland TAP to coordinate and provide Assistive Technology training to DORS staff.

(3) Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

The Maryland DORS does not carry out any programs for Rural Development of the Department of Agriculture.

(4) Non-educational agencies serving out-of-school youth; and

DORS provides vocational services to out-of-school youth with disabilities in collaboration with Community Rehabilitation Programs licensed through the Maryland Department of Health–for either Developmental Disabilities Administration and/or the Behavioral Health Administration employment services as well as Community Rehabilitation Programs that are DORS accredited.

(5) State use contracting programs.

DORS does not carry out any programs for state use contracting programs.

(d) Coordination with Education Officials.

Describe:

(1) The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

DORS considers service provision to high school students with disabilities and their families a high priority. The agency coordinates services with local educational agencies in order to identify diploma and certificate students with disabilities and provide services designed to help them prepare for and achieve employment and self-sufficiency. VR services and Pre-Employment Transition services are coordinated both at the statewide level as well by regional directors and supervisors on a local level.

(2) Information on the formal interagency agreement with the State educational agency with respect to:

(A) consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

DORS is an organizational unit of the MSDE. DORS, therefore, is a signatory and partner in implementation of the Maryland Intra-agency Cooperative Planning Agreement for Secondary Students with Disabilities. This is an agreement between the Division of Early Intervention and Special Education Services and the DORS. The agreement was updated on July 2019 to reflect changes as a result of the WIOA of 2014. This agreement identifies the roles and responsibilities of the cooperating Divisions at the state and local level, including the process for technical assistance and training to schools; outreach to and identification of students with disabilities in need of transition services and pre-employment transition services; transition planning by VR and educational personnel that facilitates the implementation of pre-employment transition services; assurances for the development and completion of the Individualized Education Program (IEP) that is coordinated with the development of the Individualized Plan for Employment (IPE) within 90 days of an Eligibility determination or date of removal from Priority of Services/Order of Selection waiting list; financial responsibilities and methods to resolve disputes; and referrals, to include all students with disabilities in secondary education that may benefit from pre-employment transition services. High School students with disabilities are referred for VR Services during the fall of their next to last year in secondary school. Schools also provide information to families and high school students and refer students to DORS for pre-employment transition services, who are at least 14 years old but less than 22, as early as a student's first year of high school.

Local Agreements

Upon finalization of the updated Maryland Intra-agency Cooperative Planning Agreement for Secondary Students with Disabilities, DORS and local education agencies will update local cooperative agreements to clarify roles and responsibilities at the local level as appropriate. Local cooperative agreements are in the process of being updated. DORS also maintains local cooperative agreements with the Maryland School for the Blind and the Maryland School for the Deaf regarding appropriate transition services for these under-served student populations.

State Law – Counselor Assignment To Secondary Schools; Completion Of The Individualized Plan For Employment

Maryland State Law requires that DORS assign a counselor to each public secondary school in the state to promote effective transition. It also requires that DORS complete the Individualized Plan for Employment for eligible students with disabilities within 90 days of an Eligibility determination or off-delayed date.

The Governor's Interagency Transition Council For Youth With Disabilities

By state law, DORS is a permanent member of the Governor's Interagency Transition Council for Youth with Disabilities, recently reissued as Executive Order 01.01.2007.13. DORS collaborates with 26 other Council members, including state agencies (Department of Health and Mental Hygiene, MD Labor, Maryland Technology Assistance Program, Higher Education Commission, Workforce Investment Board), representatives of schools, disability advocacy groups, and individuals with disabilities and their families. The purpose of the Council is to promote effective transition services for students with disabilities throughout Maryland. This includes outreach to students and referral to DORS and other agencies that can be of assistance.

(B) transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

DORS maintains a Staff Specialist for Transition position to lead the following activities:

- Coordinate all VR and Pre-Employment Transition Service activities and projects with other state agencies, community organizations, public and private facilities, local DORS field offices, and employers.
- Collaborate with the DORS Grants Administrator in responding to federal and state transition requests for proposals and in implementing cooperative agreements.
- Develop, update and monitor transition documents.
- Provide program information to state level transition personnel and to the local education agencies through in-service training and publications.
- Serve as consultative staff for the Governor's Interagency Transition Council for Youth with Disabilities.
- Facilitate an intra-agency transition group for counselors who provide transitioning services for the purpose of information sharing and ongoing training.

(C) roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

DORS maintains a Staff Specialist for Transition position to lead the following activities:

- Coordinate all VR and Pre-Employment Transition Service activities and projects with other state agencies, community organizations, public and private facilities, local DORS field offices, and employers.
- Collaborate with the DORS Grants Administrator in responding to federal and state transition requests for proposals and in implementing cooperative agreements.
- Develop, update and monitor transition documents.
- Provide program information to state level transition personnel and to the local education agencies through in-service training and publications.
- Serve as consultative staff for the Governor's Interagency Transition Council for Youth with Disabilities.
- Facilitate an intra-agency transition group for counselors who provide transitioning services for the purpose of information sharing and ongoing training.

(d) procedures for outreach to and identification of students with disabilities who need transition services.

- DORS will facilitate activities to bring state-of-the-art transitioning services to Maryland's students and families, including the following Pre-Employment Transition Services as outlined in the WIOA: job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs, workplace readiness training to develop social skills and independent living, and instruction in self-advocacy.
- DORS will continue to explore, develop and expand new initiatives and methodologies that promote the provision of Pre-Employment Transition Services and successful post-school outcomes, including the following: employment, post-secondary education and training, community participation, independent living, and healthy lifestyles. The initiatives will be accomplished through a variety of cooperative agreements, cooperative funding agreements, special grants, joint training of DORS staff and school districts/SEA whenever possible, outreach to partners with access to students with disabilities, or other innovative means.
- DORS will work with local businesses and agencies as needed to expand opportunities for internships, mentoring, and summer employment experiences as a way to prepare students for viable careers.
- DORS will identify opportunities to provide information and outreach materials for transitioning students and their families.

(e) Cooperative Agreements with Private Nonprofit Organizations.

Describe the manner in which the designated State agency establishes cooperative agreements with private nonprofit VR service providers.

Cooperative Agreements are developed between DORS and approved Community Rehabilitation Programs in order to assure a mutual understanding of the services to be provided to DORS consumers, referral procedures, expectations, and responsibilities of all parties. The Division utilizes Community Rehabilitation Programs to the maximum extent feasible to provide a wide range of highly skilled VR services to individuals with disabilities around the State. DORS continually assesses the needs of individuals with disabilities and recruits new organizations and expands services with existing ones in order to meet those needs.

The Approval Process

DORS purchases services from Community Rehabilitation Programs that are accredited and operate in compliance with federal regulations and operate in compliance with the regulations for Title I, Vocational Rehabilitation Services Program implementing the Rehabilitation Act Amendments of 1992, Section 361.51.

The approval and ongoing monitoring of Community Rehabilitation Programs is an important factor in the operation of the state VR program in Maryland. The purpose of these reviews is, as follows:

- To improve the quality of services delivered to individuals with disabilities;
- To assist the governing board of the Community Rehabilitation Program and other interested groups in the community to better understand what is required for a sound program; and,
- To serve as a means for self-evaluation by the board, administrator, and staff.

Community Rehabilitation Programs must hold accreditations from a national organization such as the Commission on Accreditation of Rehabilitation Facilities (CARF), or may also be in "deemed" status, having been accredited by other Maryland government agencies, such as the Maryland Department of Mental Health, Behavioral Health Administration The DORS staff specialist for community rehabilitation programs will perform onsite monitoring reviews every three years. The specialist, along with a local DORS staff person, advises the Community Rehabilitation Programs on what is required and then conducts an onsite review to examine all resource documents, consumer files, and details about programs. As appropriate, Community Rehabilitation Programs staff may attend the overview and exit conferences.

In the past, DORS provided an Accreditation for Community Rehabilitation Programs that were not licensed through either the Behavioral Health Administration or the Developmental Disabilities Administration or not CARF accredited. Overtime, this practice has become cumbersome given the capacity and time restrictions of the staff specialists and the lack of outcomes of the programs accredited. DORS will now require provider organizations that are not licensed or certified to provide employment services to demonstrate CARF accreditations.

DORS realizes the financial burden of this undertaking and has established a protocol for assisting approved provider organizations approved under the current DORS Accreditation. DORS will reimburse half the initial accreditation cost for Employment Services for these organizations. DORS expects these agencies to complete CARF Accreditation within the next five years.

If the program demonstrates its ability to serve DORS consumers, a cooperative agreement is drafted for approval and signature. The agreement outlines roles, responsibilities and fees.

Services Purchased by DORS

DORS purchases a wide variety of services that assist people with disabilities to reach independence and employment. These may include pre-employment transition services, assistive technology services, employee development services, non-supported employment job coaching, skills training and specialized services such as those for individuals with acquired brain injury.
DORS may also purchase job-coaching services from CRPs that have supported employment programs approved by the Behavioral Health Administration and the Developmental Disabilities Administration.

DORS will also purchase career assessment services which include community based assessment provided by private vendors who are Certified Vocational Evaluators or Professional Vocational Evaluators.

(f) Arrangements and Cooperative Agreements for the Provision of Supported Employment Services.

Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Division enters into cooperative agreements with the Developmental Disabilities Administration and the Behavioral Health Administration in order to provide for increased interagency cooperation, to ensure the maximum utilization of appropriate programs and resources in the provision of services to individuals with disabilities, to expand and improve services to individuals with significant disabilities, and to maximize the use of comparable benefits.

Formal written agreements set forth terms and conditions under which the Division and another agency or organization will cooperate in the provision of services. These formal interagency cooperative agreements will: identify policies, practices, and procedures that can be coordinated among the agencies (particularly definitions, standards for eligibility, the joint sharing and use of evaluations and assessments, and procedures for making referrals), identify available resources and define the financial responsibility of each agency for paying for necessary services (consistent with State law) and procedures for resolving disputes between agencies, and include all additional components necessary to ensure meaningful cooperation and coordination.

Evidenced-Based Supported Employment

DORS has implemented a Milestone Payment system for psychiatric rehabilitation programs offering Evidence-Based Supported Employment services. The Milestone Payment system significantly streamlines provision of services for DORS and provider staff by substantially reducing preparation of authorizations and invoices, tracking of hours of services, and simplifying reporting.

Employment First

DORS is a partner with other State agencies (including WIOA Partner, MD Labor) and Community Rehabilitation Programs in implementing Employment First, a national effort to assure that all individuals, including those with significant disabilities, consider employment on a preferred basis in planning for their lives. Employment First, is consistent with DORS' belief that individuals with disabilities, even the most significant disabilities, can work in meaningful positions in integrated settings when provided with adequate, appropriate support. Supported employment is appropriate for individuals in Employment First and is the means to assure the best chance for success in employment. Benefits planning is an important part of services for individuals served through Employment First.

(g) Coordination with Employers.

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

(1) VR services; and

Businesses must play a central role in the workforce system and, in coordination with its WIOA Partners, DORS continues to expand engagement with businesses to assist them with their workforce needs and provide for quality VR services and employment outcomes. Like its WIOA Partners, DORS has embraced the dual-customer model and has dedicated staff tasked with employer outreach and engagement, as well as technical assistance to VR counselors and consumers.

The DORS Business Relations Branch includes a Program Manager and seven regional Business Services Representatives. This organizational structure ensures statewide oversight, information sharing and collaboration, and a team approach to employer engagement. The Business Relations Branch works closely with the agency's Workforce and Technology Center (WTC) Employment Services to coordinate services to employers that enhance services and employment outcomes for consumers. WTC's training advisory committees engage employers in specific industries to ensure training programs are in line with industry needs and standards, and WTC's Work Readiness Programs work with community employers to develop worksites for students. Additionally, the Workforce and Technology Center's Rehabilitation Technology Services is a key component to serving employers through its worksite services.

DORS Business Services Representatives collaborate with MD Labor and local workforce business services representatives for business outreach and quality services. The WIOA Partners and their Business Services teams agree to work together to ensure quality customer service to businesses. Through frequent communication and collaborative efforts, the WIOA Business Services Team members have developed a deeper understanding of the services each partner offers, and, after understanding a business's needs, connections are made with appropriate team members to ensure the workforce needs are met. Additionally, the local Business Services Teams collaborate and sponsor events beneficial to businesses, such as trainings, business summits, and job fairs.

The DORS Business Relations Branch and WTC Employment Services meet and participate in training to enhance team capacities in working with employers to expand employment and work-based learning experiences. Employer services are documented and tracked in the Employer Module of the AWARE case management system.

These structures and collaborative activities ensure that DORS is prepared and able to effectively engage with businesses to meet their workforce needs. The activities also provide the best information on careers, business needs, labor market information, and opportunities to jobseekers so that they can make informed choices on their employment goals and access programs and services that lead to successful outcomes.

(1) DORS will build relationships with businesses that result in improved career development and competitive-integrated employment outcomes for consumers through the following activities:

- Promoting and marketing the employment of persons with disabilities by networking and developing active partnerships with businesses and business-related organizations, such as Chambers of Commerce, Society of Human Resource Managers, Business Leadership Networks, WIOA Partners in the AJCs, MD Labor, State and Local Boards, and state and local economic development offices. Regional Business Services Representatives will be visible and available to area businesses and will serve as a single-point-of-contact, leading to improved business relations and access
- Training and technical assistance to employers and WIOA Partners to promote the awareness of the skills and benefits that people with disabilities can bring to their workforce. Types of training include: information on DORS services and training programs, disability awareness, requirements of the Americans with Disabilities Act, and federal contractor compliance with Section 503. Group training opportunities for businesses will be offered, as well as individual consultation and need-driven training for specific employers
- Providing consultation on and support to remove disability-related obstacles to employment and the provision of reasonable accommodations for recruitment, work-based learning activities, and on-boarding and retention of employees, including assistive technology and worksite assessments. Business Services Representatives will serve as points of contact for businesses needing guidance, and the Workforce and Technology Center Rehabilitation Technology Services unit will provide specific and applicable worksite services for consumers and employers
- Providing information and resources on hiring incentives, including tax credits and OJT wage reimbursements. Business Services Representatives will provide technical assistance to businesses in completing any required forms to access incentives
- Facilitating and coordinating recruitment activities for business partners who are interested in hiring DORS consumers, including advertisement, pre-screening, and interview preparation of consumer applicants, providing interview venues, referrals and follow-up. Job openings and recruitment activities will be shared via email with counselors, consumers, and Community Rehabilitation Programs, and recruitment services will be tracked in the AWARE Employer module
- Collaborating with WIOA Partners, including MD Labor and local business services representatives and economic development partners to leverage business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities;
- Coordinating with the WIOA Business Services Team and AJCs in recruitment events and job fairs, including recruiting businesses and facilitating the inclusion of DORS consumers in the talent pool
- Engaging with businesses interested in hiring people with disabilities through VR National Employment Team (NET) connections and activities. This includes NET conference calls, webinars and events with business partners and facilitating the inclusion of Maryland consumers in the national Talent Acquisition Portal
- Partnering with Community Rehabilitation Programs to facilitate communication and collaboration among business services representatives and employment specialists in sharing business contacts, job openings, and strategies on job placement for consumers; this includes expansion of regional job developer alliance groups

- Providing business and industry-specific career information. training sessions, and tours for consumers and counselors
- Developing and monitoring of work-based learning and resume-building opportunities, such as internships, job shadowing, disability employment awareness month activities, volunteering and OJT, including expanding programs already in place, such as the Governor's QUEST Internship Program, and federal agency VR internship programs
- Promoting the federal Workforce Recruitment Program to businesses and consumers
- Engaging businesses in Training Program Advisory Committees at WTC to ensure training programs meet business and industry needs and standards and to facilitate work-based learning and employment opportunities, including apprenticeships
- Coordinating with businesses to develop community worksites for students in Workforce and Technology Center's Work Readiness 2 Program. Students spend a portion of their day during the six-week program at a business worksite learning and performing job tasks
- Developing customized and business-driven training programs for DORS consumers
- Leading and participating with MD Labor, workforce partners, and businesses in the Maryland Apprenticeship Think Tank to expand apprenticeship opportunities for individuals with disabilities
- Developing Apprenticeship Exploration activities and Pre-Apprenticeship programs at WTC and with partners to education and prepare DORS consumers for careers through apprenticeship
- Providing Apprenticeship Navigation services for consumers; the WTC Apprenticeship Navigator will work with MD Labor's Apprenticeship and Training Program staff and businesses to help consumers along the path to an apprenticeship
- Collaborating with strategic partners, such as the Maryland Department of Disabilities, colleges and universities, and federal, state and local governments to connect employers and consumers
- Supporting and promoting state industry-led workforce training initiatives of the WIOA system, such as apprenticeship programs and Maryland's EARN program to DORS consumers
- Connecting DORS consumers with businesses and employment opportunities through the MWE.

DORS Business Services Representatives will provide technical assistance to both counselors and consumers related to job readiness, career information, labor market analysis, and real-time and projected employment opportunities gleaned through active engagement with businesses, business-related organizations, and WIOA Partners.

(2) transition services, including pre-employment transition services, for students and youth with disabilities.

DORS will work with employers and community partners to develop and expand work-based learning for students and youth with disabilities through the following activities:

- Awareness opportunities for students and youth on careers, industries, labor market information, and workforce needs, including workshops or other training that includes employer speakers and presentations, career fairs, and workplace tours;

- Preparation activities for students and youth that teach workplace skills, job readiness, interview skills and practice, and self-advocacy in application and employment processes;
- Exploration and skill-building opportunities for students and youth to include job shadowing and mentoring, volunteering, internships, OJT, and employment;
- Continued development and coordination of pre-employment transition services through community colleges, school systems, Community Rehabilitation Programs, and AJCs;
- Expansion of pre-employment transition services to rural and underserved areas to increase work-based learning experience opportunities for students and potential partnering businesses.
- Expansion of internship programs, such as QUEST, to include students and transitioning youth; and,
- Continued partnership with school systems, and work force partners to provide summer youth employment opportunities and year-round work-based learning experiences to businesses and students.

(h) Interagency Cooperation.

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

(1) the State Medicaid plan under title XIX of the Social Security Act;

DORS will work with the Maryland Medicaid agency toward establishing a cooperative agreement, as outlined in the WIOA. DORS and the State Medicaid agency will collaborate in developing strategies to maximize resources and develop opportunities for competitive integrated employment for individuals with disabilities.

(2) the State agency responsible for providing services for individuals with developmental disabilities; and

DORS has entered into a cooperative agreement with the Maryland Department of Health and Mental Hygiene, Developmental Disabilities Administration (DDA), to provide for increased interagency cooperation, to ensure the maximum utilization of appropriate programs and resources in the provision of services to individuals with disabilities, to expand and improve services to individuals with significant disabilities, and to maximize the use of comparable benefits. The agreement sets forth terms and conditions under which DORS and DDA will cooperate in the provision of services. The formal interagency cooperative agreement identifies policies, practices, and procedures that are coordinated between DORS and DDA (particularly definitions, standards for eligibility, the joint sharing and use of evaluations and assessments, and procedures for making referrals). It also identifies available resources and defines the financial responsibility of each agency for paying for necessary services, consistent with State law and procedures for resolving disputes between agencies, and includes all additional components necessary to ensure meaningful cooperation and coordination.

DORS and DDA updated and approved the Cooperative Agreement, Employment Services, in October 2013. The agreement focuses on the implementation of Employment First in Maryland. It addresses referral between agencies, specifies shared responsibilities for funding of supported employment, and describes cross-training activities.

(3) the State agency responsible for providing mental health services.

Recognizing the shared responsibility to optimize resources and expand employment opportunities for individuals with mental illness and co-occurring mental illness and substance related disorders in Maryland, DORS and BHA are working to update the cooperative agreement between BHA and DORS. While both state agencies are committed to the dissemination and implementation of Evidence-Based Practice (EBP) in Supported Employment (SE) statewide, this agreement addresses the provision of both traditional supported employment services as well as EBP in SE. It also addresses SE services provided within the context of Assertive Community Treatment (ACT) and First Episode Psychosis Programs (FEPP).

The cooperative agreement addresses referrals between agencies, specifies shared responsibilities for funding of supported employment, as well as cross-training for staff. This Agreement formalizes the ongoing collaborative relationship between DORS and BHA. To meet the requirements outlined in the WIOA, the agreement updates policies and practices for each organization as well as defines the shared responsibility in the implementation of supported employment (SE) services for youth and adults with mental illness or a co-occurring mental illness and substance-related disorder.

The updated cooperative agreement is projected to be finalized early 2020.

(i) Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development.

Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:
(1) Data System on Personnel and Personnel Development
(A) Qualified Personnel Needs. Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:
(i) the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

DORS has established policies and procedures for a Comprehensive System of Personnel Development, which ensures that all personnel:

- Are well qualified,
- Regularly take part in staff development,
- Participate in performance-based evaluation systems, and
- Meet required licensing/certification standards.

Training, education, and developmental activities ensure appropriately skilled staff, with special emphasis given to rehabilitation technology, employer services, transitioning and disability-specific (e.g., blindness) skills. This system strives to fill vacancies with well-qualified and culturally diverse applicants.

As part of the MSDE, DORS is required to adhere to personnel development policies and procedures contained in 34 CFR 300.15, 34 CFR 300-383, 20. U.S.C. 1413 (A) (3) and in the Code of Maryland Regulations 13 A., 05.01.03G.

(1) Data System on Personnel and Personnel Development.

(A) Qualified Personnel Needs.

DORS has a data system to annually obtain information on personnel and personnel development, as follows:

- The number of personnel who are employed by the state agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category.
- By December 31 of each year DORS will:
    - Use the RSA A2 Report of September 30 to determine the number of DORS positions in provision of VR services (total number of DORS positions minus total number of Disability Determination Services positions).
    - Determine the number of positions in the following categories:
        - Rehabilitation Counselors;
        - Administrative Staff;
        - Staff Supporting Counselor Activities; and
        - Other.
        - Determine the number of individuals served effective September 30 from the AWARE case management system.

- The number of personnel currently needed by the state agency to provide VR services, broken down by personnel category;

Using the MSDE Personnel Report of September 30, DORS will analyze vacancy rate and vacancies in the specific categories. DORS will also consider total number of staff needed based on waiting list and other factors.

- Projections of vacancies in personnel, broken down by personnel category, needed by the state agency to provide VR services in the state in five years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.
- Ascertain turnover rate for most recent federal FY; and
- Project vacancies over the next five years in light of current staffing and
- Turn-over rate and other relevant factors.

(ii) the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and
(iii) projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in five years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Job Title	Current Positions	Current Vacancies	Projected Vacancies Over Next 5 Years
Rehabilitation Counselors	138	20	75*
Administrative Staff	81	10	10*
Staff Supporting Counselor Activities	213	13	80*
Other	9	-	-

(B) Personnel Development.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:
(i) a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

Following is a description of DORS' system for collecting and analyzing data on personnel development on an annual basis:

- Compile a list of the institutions of higher education in the state that are preparing VR professionals, by type of program.
- Compile a list of programs in Maryland preparing VR staff at the bachelor's, master's, and certificate level.
- Determine the number of students enrolled at each of those institutions, broken down by type of program.
- Determine the number of students who graduated during the prior year from each institution with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

(ii) the number of students enrolled at each of those institutions, broken down by type of program; and

At the conclusion of each academic year, DORS will contact coordinators of programs at Maryland institutions of higher education to obtain information about the following:

- The number of students enrolled in each type of program;
- The number of employees sponsored by DORS or the US Department of Education, Rehabilitation Services Administration;

- The number of employees sponsored by DORS or the Rehabilitation Services Administration who have graduated;
- The number who have graduated; and
- The number who have graduated with certification, licensure, or credentials required to achieve certification/licensure.

DORS staff will then determine personnel category of graduates who have certification, licensure, or credentials to achieve certification/licensure.

(iii) the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Annual Analysis/Report

1. Compile data;
2. Analyze information compared to previous years and determine trends;
3. Based on data and trends, determine implications for rehabilitation services for individuals with disabilities in Maryland; and
4. No later than December 31, prepare a report of findings to include recommendations in Division planning and other activities, as appropriate.

Institution	Students Enrolled	Employees sponsored by agency and/or RSA	Graduates sponsored by agency and/or RSA	Graduates from the previous year
Coppin State University	84*	1	0	11
George Washington University	49*	0	0	3 (Fall data only)
University of the District of Columbia	75	0	0	25
University of Maryland: Eastern Shore	Data not received as of 12/9/2019			

* Data represents spring, summer, and fall 2019 semesters combined

(2) Plan for Recruitment, Preparation and Retention of Qualified Personnel.

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

DORS plans to:

- Annually take the information and recommendations from the Data System described above regarding current and projected needs for personnel;
- Based on findings, design a recruitment plan for the upcoming year in collaboration with colleges and universities, and the Maryland Rehabilitation Association; and
- Update the Plan on an annual basis, as needed.

Colleges/Universities in Maryland with Rehabilitation Counseling Programs

Institution	Location	Programs
Coppin State University (Historically Black Institution)	Baltimore, Maryland	• Undergraduate degree in Rehabilitation Counseling • Master's degree in Rehabilitation Counseling • Certificate Program in Assistive Technology • Post-Master Certificate Program in Professional Counselor Licensure
The George Washington University	Washington, DC	• Master's degree in Rehabilitation Counseling (online & on-site) • Master's degree in Vocational Evaluation • Master's degree in Secondary Special Education and Transition Services • Certificate program in Job Development/ Placement • Certificate program in Transition Special Education
The University of the District of Columbia	Washington, DC	• Master's degree in Rehabilitation Counseling
University of Maryland Eastern Shore	Princess Anne, Maryland	• Undergraduate degree in Rehabilitation Counseling • Master's degree in Rehabilitation Counseling

The plan may include the following:

- Active membership on advisory boards of colleges/universities with programs in Rehabilitation Counseling;
- Provision of job shadowing opportunities for Masters level students in their first year;
- Provision of internship opportunities in the comprehensive rehabilitation facility and field offices;
- Staff presentations to students and classes about the public rehabilitation program;
- Collaboration with the Maryland Rehabilitation Association training committee to provide on-going in-service training opportunities to current and prospective staff;
- Maintain effective partnership with historically black institutions to assure sufficient number of applicants for state agency job vacancies, so that the workforce reflects the composition of the State; and

- To support retention of staff and succession planning, collaborate with university, professional association and the National Rehabilitation Leadership Institute partners to provide on-going mentoring and leadership activities.

(3) Personnel Standards.

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:
(A) standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and
(B) the establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

DORS has policies and procedures in place related to personnel standards to ensure that designated state unit professional and paraprofessional personnel are adequately trained and prepared, including:

- Standards for hiring VR specialists/rehabilitation counselors are consistent with standards in Maryland law, Labor and Employment Article which specify that rehabilitation counselors "have a bachelor's degree from an accredited institution in rehabilitation counseling, human services, psychology, or a related field with at least one year of work experience in a human services occupation." §9-6A-09. DORS considers related fields to include rehabilitation – career assessment, rehabilitation – employer services, education, deaf education, social work, psychology, human services, blind and vision services, employment/career counseling, and community counseling.
- Specific time period by which all state unit personnel will meet the Comprehensive System of Personnel Development standard: For 2019, 100 percent of DORS VR specialists/rehabilitation counselors met the Comprehensive System of Personnel Development standard of a bachelor's degree and a year of experience. No one is hired for such positions with less than a bachelor's degree.
- Standards for achievement of journeyman counselor status include a master's degree. DORS requires that VR specialists considered for promotion to rehabilitation technical specialist (the highest level of rehabilitation counseling) have a master's degree in rehabilitation counseling or a closely related field, which may include rehabilitation – career assessment, rehabilitation – employer services, education, deaf education, social work, psychology, human services, blind and vision services, employment/career counseling, and community counseling. DORS provides technical assistance in career development for staff, and facilitates staff application for Rehabilitation Services Administration scholarships and also provides tuition reimbursement to support staff in achieving required credentials. These education and experience requirements ensure that personnel have current understanding of the labor force and the needs of individuals with disabilities.

- DORS encourages and supports through reimbursement of initial certification fees, achievement of Certified Rehabilitation Counselor certification (CRCC), but does not require it. DORS also supports renewal courses and renewal fees of the CRCC.
- Paraprofessional personnel must meet standards of their specific position in the classified service according to position descriptions developed and updated by the MSDE Personnel Office and the Maryland Department of Personnel.

(4) Staff Development.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:
(A) a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

The Division maintains a system of staff development for staff professionals and paraprofessionals that includes the identification of training needs, developing policies and procedures, and conducting training activities. Training needs are identified based upon results of a variety of assessment instruments and methods which include: (1) the organizational Planning Process in which training areas are determined by the initiatives identified in the Division's five year Strategic Plan, the Annual Program Plan, and the Maryland WIOA State Plan; (2) DORS Performance Appraisal, which allows each professional employee and the employee's supervisor to identify on a semi-annual basis training needs and to develop a plan to assist the employee to meet the essential functions of their position as reflected in their position description. These needs are shared with the Staff Development Specialist and training needs are prioritized, developed, implemented, and/or coordinated based on the results of the information; (3) Program Evaluation: Areas of need are identified by the DORS program evaluator, through the case review process and the RSA 107 review; (4) The triennial comprehensive assessment of the needs of individuals with disabilities, included as Attachment 4.11 (a); (5) Division's Policy Review Committee, the State Rehabilitation Council (SRC), and annual public meetings provide feedback and a continuous evaluation component identifying needs that can be addressed and/or alleviated by training which are submitted to the Staff Development Office for appropriate action; (6) Individual Staff Training Needs Survey: A training needs assessment questionnaire is distributed to all staff annually. The results are tabulated and categorized to prepare for individual and/or group training programs.

Policies and Procedures for staff development activities are maintained in the Division's Rehabilitation Services Manual I, Administrative Manual, section 700, as well as the Staff Development Site on InDORS, the Division's intranet which allows staff to access information on policies and procedures for in-service training opportunities, tuition reimbursement, reimbursement for fees related to achievement and maintenance of CRC credentials, mentoring and leadership activities, and provides a training calendar with links to brochures and registration information.

Training Activities

The Staff Development program identifies training needs from surveys and sources noted above, and it develops and provides training to professional and paraprofessional staff through quarterly, annual, and customized training activities, which include the following:

- Orientation and training on fundamental rehabilitation process and procedures is provided to all new staff through Getting Connected, the Supervisor's Guide to training new staff through the Divisions, and the Quality Rehabilitation Training program provided to all new staff;
- Training for special populations is provided including: blindness and vision services, deaf and hard of hearing services, services for individuals with acquired brain injury, individuals on the autism spectrum, transitioning youth, and psychiatric rehabilitation throughout the year;
- Training in career assessment services is offered semi-annually;
- Rehabilitation technology training is offered throughout the year on a variety of assistive technology and worksite accommodation issues. When possible, these Assistive Technology trainings are coordinated with the MD Technology Assistance program;
- Statewide prescriptive training on a variety of topics is delivered to all counselors, including career counseling, employer services, ethics, job placement, case note/case documentation training, Americans with Disabilities Act training, autism spectrum disorders;
- Staff participate in the annual statewide training conference sponsored by the DORS and the Maryland Rehabilitation Association;
- New supervisors training and ongoing training activities for supervisors and Division administrators are provided during semi-annual statewide supervisors meetings. Staff managers participate in management and leadership training through vendors;
- Training is provided on topics specific to the implementation of WIOA, such as Pre-Employment Transition Services and Sub-Minimum Wage requirements;
- Paraprofessionals participate in statewide prescriptive training throughout the year with their units, as well as an annual training activity customized to meet the needs of staff and to address agency priorities; and
- Business Services Representatives participate in various trainings and online courses as well as the annual Mid-Atlantic ADA Update Conference to expand their knowledge and hone their skills as ADA trainers.

The Staff Development office maintains a data base of all training activities attended by Division professional and paraprofessional staff, according to the individual staff member, unit, and Office.

(B) procedures for the acquisition and dissemination of significant knowledge from re-search and other sources to designated State unit professionals and paraprofessionals.

The Division ensures that professional and paraprofessional staff receive significant knowledge from research and other sources by keeping abreast of the latest information on disability issues, legislation, and current topics and training on rehabilitation. Information, including WIOA implementation policy and procedures, will continue to be disseminated to staff in a variety of ways including the following:

- Posting information to staff on the Division's InDORS intranet and public website: www.dors.maryland.gov;
- Disseminating email and agency program directives, administrative instructions, and information bulletins;
- Developing agency policy and procedures based on federal and state law and regulation, as needed;
- Revising agency policy and procedures manuals, as needed
- Providing staff training on new policy and policy and procedural updates
- Providing staff training, by DORS and WIOA Partners, on a variety of current topics
- Attending meetings, conferences, and workshops, including the Maryland WIOA Convening, Maryland WIOA Work Group meeting, and WIOA Partner training
- Posting training resources and archive presentations on the DORS website and intranet.

(5) Personnel to Address Individual Communication Needs.

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Meeting the Needs of Individuals Who are Deaf, Hard of Hearing or Deaf/Blind

DORS has personnel skilled in American Sign Language who are assigned to provide services to consumers who are deaf and hard of hearing and deaf/blind who require such communication. DORS has TTYs in offices and has installed video phones within the office locations of rehabilitation counselors for the deaf (RCDs). DORS hires approved interpreters, as needed, to assure that consumers have access to the full range of rehabilitation services they may need. DORS supports attendance of consumers at institutions specializing in services for the deaf, as appropriate.

DORS has a dedicated office, the Office for Blindness & Vision Services, which has counselors who have specialized caseloads working with individuals who are blind, visually impaired, or deaf blind. These staff participate in at least quarterly training on topics specific to blindness and vision services, assistive technology, job development, career counseling, and participate in other Division sponsored training with all staff. DORS collaborates with its partners in the provision of training including the National Federation of the Blind (NFB), the American Foundation for the Blind (AFB), Association for Education and Rehabilitation of the Blind and Visually Impaired (AER), and Helen Keller National Center (HKNC). DORS provides assistive technology, as appropriate and required, for individuals who are blind or vision impaired. DORS provides all information for consumers in the requested alternate format of the individual. DORS website and intranet are fully accessible to users of screen readers.

Meeting the Needs of LEP Individuals

DORS provides interpreter and translation services to consumers through the state contract for such services and through staff with skills in languages other than English. A DORS workgroup

addresses a multicultural initiative, which includes identification of staff with language skills in addition to English, enhancing cultural competencies of staff, identification of community resources, and provision of public information and agency forms in alternate languages. The Division includes periodic in-service training opportunities on cultural proficiency.

(6) Coordination of Personnel Development Under the Individuals with Disabilities Education Act.

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

The Division has personnel who have specialized caseloads serving transitioning youth. These staff participate in quarterly training activities on current transition topics. Staff are also encouraged to participate in ongoing professional development through participation in a variety of workshops, conferences, and in service training opportunities that are disseminated via email to all staff and posted on the Divisions InDORS intranet. Staff are also encouraged to participate on WIOA Partner trainings and in other activities, such as the George Washington University's Master's level 12 credit online transition certificate program. Examples of cross-training with secondary school personnel include the following:

- Training in evidence-based transition practices for Local Education Agency staff and DORS staff provided by TransCen, Inc., as part of the Maryland Seamless Transition Collaborative
- Training on Autism Spectrum disorders provided by DORS in partnership with Pathfinders for Autism and the Maryland Rehabilitation Association. The Workforce & Technology Center supervisor of Autism Services is a certified Autism Specialist and has provided training to Workforce & Technology Center staff, to offices with the Office of Field Services, and at the Maryland Rehabilitation Association/DORS Annual Training Conference
- Training and presentations on blindness and vision services with the Local Education Agency and itinerate teachers and DORS staff are held on a regular basis

(j) Statewide Assessment.

(1) Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

Maryland DORS and Maryland State Rehabilitation Council
Executive Summary

DORS and the Maryland State Rehabilitation Council (MSRC) continually assess the rehabilitation needs of Maryland citizens with disabilities, as part of its state and strategic planning process. DORS and the MSRC hold annual public meetings and the MSRC regularly provides input on Agency planning, policy development and recommendations. The results of the consumer

satisfaction surveys are also reviewed in order to provide insight into the rehabilitation needs of Maryland citizens with disabilities.

This year, the Agency in collaboration with the MSRC undertook the triennial comprehensive needs assessment in compliance with the Code of Federal Regulations at 34 CFR (361.29). The 35-member team consisted of DORS staff, including participants in the Agency's Leadership Exploration and Agency Programs (LEAP) and consultation from MSRC. The LEAP program is one component of the DORS Leadership Development Program. Through pairing with experienced staff, this program provides an opportunity to increase and expand a participant's knowledge about the Agency, as well as, determine his/her inclination for leadership. The Needs Assessment team (1) collected and analyzed relevant existing data, (2) conducted and analyzed findings of supplemental surveys, and (3) facilitated focus groups and key informant interviews, in order to ascertain the needs of individuals with disabilities throughout the state.

Required Elements

The results of the Needs Assessment include the following required elements:

I. The rehabilitation needs of individuals with disabilities residing within Maryland, particularly the VR needs of:
   A. Individuals with most significant disabilities, including their need for supported employment services.
   B. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program.
   C. Individuals with disabilities served through other components of the statewide workforce investment system.
   D. Youth with disabilities, and students with disabilities, including:
      1. Their need for Pre-Employment Transition Services (Pre-ETS) or other training services.
      2. An assessment of the needs of individuals with disabilities for transition services and Pre-ETS services, and the extent to which such services are coordinated with local education agencies and other education systems.
      3. Assessment of the needs of transitioning youth with disabilities entering two- and four-year colleges and the extent to which such services are coordinated with college disability support services staff.
      4. Assessment of the needs of students and their parents eligible for pre-employment transition services and the extent of which information regarding: getting a job, the job market, job shadowing and related activities, college or training opportunities, skills learned, and skills still needed have been provided to these students and parents.

II. An assessment of the need to establish, develop, or improve community rehabilitation programs within the State.

Recommendations from the Focus Areas of the Needs Assessment Addressing the Required Elements

1. Continue to monitor, strengthen, and foster relationships with MD Labor, Department of Health, and MSDE. Continue to explore data sharing strategies to demonstrate collaboration for the provision of services, and to ensure a smooth referral process between partners.
2. Evaluate the staffing needs within DORS, with a focus on the number of full-time VR counselor positions across the state to ensure an effective and manageable caseload distribution and to ensure that there is a sufficient number of VR counselors who provide services to transitioning youth and students with disabilities to accommodate the anticipated increase in the number of student referrals to DORS VR and Pre-ETS programs.
3. Provide continued opportunities for mutual training and collaboration between DORS and other workforce programs.
4. Enhance and expand the provision of Pre-ETS services statewide to include: increase the number of Pre-ETS services for individuals who are Deaf or Hard of Hearing, Blind or Visually Impaired, and Intellectually or Developmentally Disabled; expand outreach to Pre-ETS students and families whose first language is not English; align staffing and caseload assignments for better collaboration with local education agencies and other education systems; ensure consistent interpretation and implementation of policies and procedures and quality assurance standards; and improve cooperation between DORS Pre-ETS VR counselors and school staff monitoring 504 plans as DORS has limited access to students with 504 plans.
5. Improve information and referral services to AJCs and other workforce partners for individuals on the DORS waiting list, especially Social Security beneficiaries who may benefit from employment network services while waiting for DORS services to be available. Referral information should pertain to the closest and most relevant employment network for the individual.
6. Improve the variety of employment opportunities available to DORS consumers by increasing staff knowledge of current labor market trends, collaborating with community colleges to develop Pre-Apprenticeships and RA programs for high growth industries in Maryland. Expand and continue the collaboration with the Maryland Apprenticeship Think Tank to increase the number of individuals with disabilities participating in youth Pre-Apprenticeship and RA programs, outreach to WIOA partners, and identify community colleges and employers to provide training for a variety of apprenticeship programs for individuals with disabilities.
7. Re-establish the Agency's Multicultural Access Committee to ensure equal access for minorities to DORS services. This committee needs to ensure that the resources needed by DORS field staff have been developed and implemented.
8. Promote comprehensive rehabilitation services for Deaf-Blind individuals by reconvening the Deaf-Blind workgroup and filling the vacant Deaf-Blind specialist position to collaborate closely with grassroots organizations, community partners, advocacy groups and the Helen Keller National Center, ensuring that Deaf-Blindness remains a priority for the Agency. Services should focus on statewide Support Services Program (SSP); employment services, and employer education and awareness.
9. Continue to examine the updated DORS policy regarding supported employment with a focus on the newly introduced supported employment opportunities for individuals without access to long-term funding for extended supported employment services, and the impact

of supported employment intensive job coaching supports focused on achieving job stability and retention.

10. Expand employment services for individuals who are Deaf or Hard of Hearing by developing enhanced relationships with businesses. Employment specialists and VR counselors serving Deaf and Hard-of-Hearing consumers should have an employment toolbox which contains information on how to approach businesses and develop working relationships.
11. DORS should explore a rate increase for DORS-approved community rehabilitation programs.
12. Enhance relationships with community rehabilitation programs for increased collaboration in the following areas: knowledge and understanding of DORS policies and procedures; understanding benefits counseling and when it is to be provided; communication; and timely submission of documents, reports, and invoices.
13. Continue to work with 14c certificate holders to explore the number of individuals remaining in sub-minimum wage, how that may impact the number of referrals to DORS, and the barriers that 14c certificate holders are experiencing in moving individuals off 14c work sites.

Impact of Federal Funding and State Government Personnel Actions on Staff Capacity

As emphasized in the previous Needs Assessments, the DORS waiting list and delays in service provision remain a prominent concern and constitute the most prominent barrier to VR services for individuals with significant disabilities in Maryland. As of the completion of this Needs Assessment, over 2,500 eligible individuals with significant disabilities are placed on a waiting list for VR services lasting up to 32 months. Clearly, individuals on the waiting list are the most seriously unserved of populations. Several factors currently prevent DORS from moving people from the waiting list.

Sequestration

Maryland DORS' funding for the three-year period of FY 2017 to FY 2019 has increased from $43,855,573 to $45,197,460; a three percent increase over the last three years, while inflation over that same period has increased at a rate of 4.7 percent. This difference is the result of sequestration, which is a cut in funding for mandatory programs. For example, in FY 2019, if the mandatory sequestration cuts had not been imposed, DORS funding would have been $48,135,376 compared to $45,197,460; a difference of $2,937,916.

Pre-Employment Transition Services: At Least 15 Percent Reserve Fund Requirement

The Rehabilitation Act of 1973, as amended by the WIOA, requires VR agencies to reserve no less than 15 percent of the federal VR allotment. This money is reserved to provide or arrange for the provision of Pre-ETS for students with disabilities transitioning from school to postsecondary education programs and employment in competitive integrated settings. This requirement for the Agency to reserve at least 15 percent of the state grant also applies to re-allotted funds. This leaves only 85 percent of the annual budget remaining for services to adults. Over the last three years, DORS has seen a dramatic increase in the number of individuals the Agency is serving that met

the definition of students with disabilities. In FY 2019, DORS is serving over 4,700 students, compared to FY 2016 when DORS served 418 students.

State Government Personnel Actions

From 2006-2019, the VR program has seen a 19 percent reduction in its permanent workforce due to statewide budget constraints and the State's desire to reduce the overall size of the State's workforce. In addition, staff turnover is affecting VR specialists/counselors. In State FY 2019, the Agency had 14 full-time PINs or ten percent of its VR counseling staff positions vacant. Also, five VR counseling contractual positions have been eliminated in the past year.

The Need of Individuals with Most Significant Disabilities for Supported Employment Services in Maryland

An increased need for supported employment services, including extended services for youth with most significant disabilities for a period not to exceed four years, is anticipated for several reasons. Since the Ken Capone Equal Employment Act became law in Maryland in 2016, information obtained indicates a reduction in the use of 14c certificates since the last Needs Assessment. The 2019 MD Labor data shows 1,462 individuals remaining in sub-minimum wage employment, representing a 58 percent decrease compared to 2016. With a total phase out of sub-minimum wage by October 1, 2020, DORS will need to continue to monitor the influence of 14c and the potential for increased supported employment needs.

On July 1, 2018, DORS introduced updated supported employment policy, including processes for eligible individuals without long-term funding available for extended supported employment services, including Agency-funded Youth Extended Services. Updated supported employment policy further includes an emphasis upon transitioning to job stabilization, where intensive job coaching supports decrease according to a fading schedule, to a predictable level of support which may be provided via ongoing support or extended services.

Methodology: DORS Data Review

DORS data was reviewed to assess the number of initial Individualized Plans for Employment (IPEs), identified as Supported Employment plans, developed during FY 2016 through FY 2018.
Discussion

Number of Supported Employment Plans Developed Each Year:

- In FY 2016, of 5097 plans initiated, 1,726 (34 percent) were supported employment plans. Out of 1,726 supported employment plans, 296 (17 percent) were developed for youth with disabilities age 24 and younger.
- In FY 2017, of 4,486 plans initiated, 1,596 (36 percent) were supported employment plans. Out of 1,596 supported employment plans, 252 (16 percent) were developed for youth with disabilities age 24 and younger.

- FY 2018, of 3,883 plans initiated, 1,660 (43 percent) were supported employment plans. Out of 1,660 supported employment plans, 313 (19 percent) were developed for youth with disabilities age 24 and younger.
- Through seven months of FY 2019, 2545 plans initiated, 897 (35 percent) were supported employment plans, 153 (17 percent) were developed for youth with disabilities age 24 and younger.

Specific Populations Provided Supported Employment Services each year:

- The number of Evidenced-Based Practice Supported Employment (EBPSE) individuals served declined seven percent from 1486 in FY 2016 to 1384 in FY 2018.
- The number of EBPSE individuals served ages 24 and under increased 41 percent from 138 in FY 2016 to 195 in FY 2018.
- The number of individuals receiving non-EBPSE supported employment has decreased 15 percent from 413 in FY 2016 to 352 in FY 2018.
- The number of youth with disabilities age 24 and younger receiving non-EBPSE supported employment has increased nine percent from 57 in FY 2016 to 62 in FY 2018.

Needs/Concerns Identified

- With a total phase out of sub-minimum wage by October 1, 2020, DORS will need to continue to monitor the influence of 14c and the potential for increased supported employment needs.
- Although the overall number of plans developed during FY 2016 through FY 2018 has decreased by an average of 12.5 percent, the number of supported employment plans has remained within the same range, averaging 1,660 individuals per FY.
- Supported employment services for youth with disabilities age 24 and younger is expected to continue to increase due to ongoing emphasis upon services for students with disabilities and final phase-out of 14c programs in the state of Maryland.

Recommendations

- Continue to examine DORS policy regarding supported employment, and evaluate the use of newly introduced supported employment opportunities for individuals without access to long-term funding available.
- Monitor the impact of supported employment intensive job coaching supports focused on achieving job stability and employment retention statistics on a quarterly basis using post-exit wage data.
- Develop strategies to streamline processes to support potentially eligible students with disabilities receiving Pre-ETS, with those potentially eligible for VR services.
- Partner with Developmental Disabilities Administration (DDA), Behavioral Health Administration (BHA), and 14c certificate holders to ensure compliance with Section 511 requirements.

Individuals Who Are Blind/Visually Impaired and Deaf-Blind

As reported in the 2016 Needs Assessment, DORS and the Office for Blindness & Vision Services (OBVS) are committed to providing quality and specialized services to Maryland citizens who are Blind, Visually Impaired, and Deaf-Blind. Together, OBVS and the MSRC Blind Services Committee provides oversight and leadership in guiding policies and enhancing services to Maryland citizens. OBVS operates the following programs and services for eligible participants:

i. VR counselors are located throughout the state in DORS field offices and at the Workforce & Technology Center (WTC). The staff is providing employment and independent living services for individuals who have a goal of employment.
ii. Rehabilitation Teachers for the Blind are also located throughout the state in DORS field offices and at WTC. The staff is providing independent living assessments and services to individuals who have a goal of employment. Additionally, these rehabilitation teachers are providing in-home teaching for Independent Living Older Blind (ILOB) grant. They assess for areas such as: mobility training, household management skills, and communication device training.
iii. OBVS is in the process of interviewing for a Deaf-Blind Specialist whose role will be to provide technical assistance and support to all staff on issues pertaining to Deaf-Blindness. Another major component of the role is to communicate with the Deaf-Blind community, expand program development, and assist with job development and placement.
iv. The Maryland Business Enterprise Program for the Blind (MDBEP) is also operated through OBVS. MDBEP provides opportunities for individuals who are legally blind to operate vending, gift shops, or other food service facilities on federal and other property.
v. Services for the Blind and Visually Impaired (SBVI) is a program for individuals who are blind or Visually Impaired and is located at WTC. SBVI addresses areas of independent living, mobility, technology, and communication training in a residential setting. The program also collaborates with the WTC for the facilitation of a support group for individuals in need of this service.

Prevalence (Blind/Visually Impaired)

According to the 2016 American Community Surveys, there are 58,094 individuals in the State of Maryland with vision loss who are between the ages of 18 and 64. During the past three years, DORS served 2,151 individuals for whom Blindness was reported to be their primary impairment, and 429 of these were youth in transition when applying for services.

There is limited data available on individuals experiencing a dual sensory loss in Maryland, but the number does appear to be relatively low. The 2017 National Child Count of Children and Youth who are Deaf-Blind, administrated by the National Center on Deaf-Blindness, identified 188 children or youth with significant levels of dual sensory loss in Maryland. Over the past three years, DORS has provided VR services for 136 individuals who are Deaf-Blind, and 25 of these were transition age youth.

***Methodology*: Blindness Services Survey**

A survey regarding Blindness and Deaf-Blind services was distributed to stakeholders, consumers, community partners, caregivers and DORS staff via email, Facebook and the DORS website to solicit feedback regarding the unmet needs of individuals who are Blind, Visually Impaired or Deaf-Blind. DORS received 125 completed surveys via email.

Needs/Concerns Identified

- Increase the use of benefits counseling for individuals seeking employment.
- Need to explore different options for job placement methods to ensure individuals, especially those who have completed trainings and internships, receive continuous assistance and have access to job leads through various mediums.
- Lack of efficiency in the service delivery and follow-up by DORS staff.
- Need to increase comprehensive and intensive Blindness skills training to help consumers become proficient in independent living skills such as cooking, Braille, cleaning, non-visual literacy, and orientation and mobility.
- Concerns related to technology, especially the lack of advanced technology/computer training being offered to consumers.
- Concerns regarding employers not hiring individuals who are Blind or Visually Impaired and their lack of knowledge regarding Blindness and workplace accommodations.
- Concerns regarding the lack of affordable and reliable transportation for consumers, including the shortage of options available in rural areas.
- Lack of support groups, role models and peer support to help consumers deal with vision loss.

Recommendations

- Collaborating with other government or private sector businesses that provide employment training.
- Provide disability education and offer more incentives to employers for hiring consumers.
- Advocate for and consider additional job development and placement hours because the placements are usually more challenging.
- Empower consumers and teach them how to advocate for themselves.
- Increase funding to hire additional DORS staff with specific knowledge of Blindness and Visual Impairments including staff specialists, orientation & mobility specialists, rehabilitation teachers, employment specialists, and VR counselors; to ensure more personalized services, increase counseling services, and a fully embraced customer service approach that is focused on the individual.
- Enhance and emphasize counselor role in:
    - Advising consumers about the full scope of services, the rehabilitation team and process, including expediting services to those in job jeopardy to ensure the consumer has the opportunity to gain knowledge and skills necessary to maintain current employment.
    - Focusing on capabilities and individualized needs and learning styles.
    - Facilitating access to assistive technology.

    - Minimizing gaps in the provision of services.
    - Increasing timeliness of the services provided.
- Increase staff knowledge about self-employment opportunities and how they can be accessed.
- Provide updated technology trainings to DORS consumers including more advanced trainings on software/devices and access technology used in competitive integrated employment.
- Explore possible solutions to issues related to limited transportation to assist those in more rural areas to have full access to DORS services.
- Expand staff and advocate for community resources to provide a full range of independent living and employment services to Deaf-Blind individuals within DORS and community programs/providers (qualified interpreters, technologists, teachers, counselors, therapists, psychologists, psychiatrists, and other professionals).

Individuals Who Are Deaf, Hard Of Hearing, And Late Deafened

Prevalence

Per the FY 2017 annual report from the Maryland Governor's Office of the Deaf & Hard of Hearing, it is estimated that there are approximately 1.2 million Marylanders who are Deaf or Hard of Hearing. For FYs 2017 and 2018, DORS has served 1,737 individuals who reported Deaf or Hard of Hearing as their primary disability (AWARE Case Management System Report: Annual All by Primary Disability).

Methodology: Subject Matter Interviews

Information regarding employer engagement when hiring individuals who are Deaf or Hard of Hearing was obtained through individual interviews with Kathy West-Evans, Director of Business Relations, Council of State Administrators of VR and John Evans, Co-Owner of Abilities United and former Program Administrator for Business Relations with the Washington State Department of Social Health Services.

During these interviews, strategies for expanding employment opportunities for Deaf and Hard-of-Hearing individuals were discussed. The interviews focused on developing trusting work relationships with employers, educating employers, accommodations, and supporting the employers needs when hiring Deaf and Hard-of-Hearing individuals. Suggestions provided included: sharing success stories with employers, presenting communication strategies, education and disability awareness. Both agreed that once you have the trust of business, you can build further relationships and begin to provide education and awareness. When you have that trust with the employer it increases comfortability levels for the employer to ask about accommodations and supports needed.

Both emphasized that ensuring that the employment specialists and VR counselors have a toolbox which contains information on how to approach businesses is vital for success. This toolbox should include but not be limited to strategies for: how to approach businesses, listening to employers and their needs, strategies for communication, and education and awareness. Mr. Evans suggested:

1. DORS should invite employers to the WTC Business Advisory Board meetings to share their experiences and highlight their successes in working with Deaf and Hard-of-Hearing individuals and where they need support.
2. DORS employment specialists need to follow-up with businesses, complete quality assurance checks, and continue to build the working relationships that exist.

In addition, both agreed that DORS employment specialists need to understand data which will help to facilitate an understanding of which consumers are working, where they are working, their earnings, and those businesses who have hired Deaf and Hard-of-Hearing individuals. Mr. Evans expressed his personal experience with data and how understanding the data helped him to continue to maintain positive business relationships and successful networking with other employers in the same area.

A major factor for successful business engagement is networking. The Agency needs to network with other professionals serving Deaf and Hard-of-Hearing individuals. It was highly recommended that DORS staff serving Deaf and Hard-of-Hearing individuals attend national conferences with those from other states.

Methodology: Survey

An online survey was distributed to Rehabilitation Counselors for the Deaf (RCD) at DORS, their supervisors and regional directors to evaluate the effectiveness of the eligibility forms (Functional Limitation Checklist and VR Priority Category Checklist) for Deaf and Hard-of-Hearing individuals. The online survey also evaluated the effectiveness of DORS staff communicating with Deaf and Hard-of-Hearing individuals through the use of technology available within the offices. The online survey was available to 24 individuals within DORS. Of the 24, 15 individuals responded (62.5 percent).

Needs/Concerns Identified

- The VR Priority Category Checklist and eligibility determination forms should be reviewed to determine effectiveness regarding Deaf and Hard-of-Hearing individuals.
- Ensure RCDs receive timely training to effectively complete forms in the AWARE case management system when determining eligibility.
- Communication devices (e.g., VRI, Sorenson, and Purple) and software should be purchased or replaced, as needed.
- Communication devices should be available to all field offices that demonstrate a need for such devices.
- Routine maintenance on communication devices should be completed in field offices.
- Training on the use of communication devices should be provided on a regular basis.
- Employment Specialists need to better understand and utilize data.

Recommendations

- Update eligibility forms and provide training to RCDs regarding appropriate use of forms when determining eligibility for Deaf and Hard-of-Hearing consumers.
- Communication devices should be checked every six months to ensure they are in working order.
- Purchase or replace communication devices, as needed, to ensure effective communication between hearing and Deaf and Hard-of-Hearing staff or consumers.
- All staff in each office should be trained at least once a year on the communication devices in their office to ensure effective communication with consumers.
- Data reports regarding employment information should be disseminated to appropriate staff on a regular basis.
- Employment specialists and RCDs serving Deaf and Hard-of-Hearing individuals should have an employment toolbox which contains information on how to approach businesses.

Individuals with Intellectual and Developmental Disability, Including Section 511 Considerations

WIOA Section 511 does not require a Designated State Unit (DSU) to identify individuals who are currently earning sub-minimum wage. However, in 2016, DORS examined the number of individuals in Maryland who were earning wages below minimum wage to determine the impact of their potential referrals to DORS. DORS is interested in knowing the number of individuals remaining in sub-minimum wage, how that may impact the number of referrals, and the barriers that 14c certificate holders are experiencing in moving individuals off 14c work sites. Since the Ken Capone Equal Employment Act was signed into law in Maryland in 2016, with a total phase out of sub-minimum wage by October 1, 2020, DORS anticipated a much lower number then in the previous report (2016).

Prevalence

Data was reviewed from the MD Labor Wage and Hour Division for Maryland. The data was current through June 2019. Information was compared to the DORS fee schedule to determine which Regions the providers primarily service.

Within the five DORS Regions, the Wage and Hour Division information translates as follows:

Region	Consumers	Community Rehabilitation Programs 14c Certificate Holders
1 – Western Maryland	229	3
2 – Southern Maryland & Lower Shore	559	6
3 – Baltimore City	5	1
5 – Central Maryland & Upper Shore	482	5
6 – DC Metro	187	1
Statewide Total:	**1,462**	**16**

Information from 2016 indicates there were 3,469 individuals served across 36 CRPs versus 2019 data demonstrating 1,462 individuals in sub-minimum wage being served by 16 CRPs.

Information obtained indicates a reduction in the use of 14c certificates since the last Needs Assessment. However, it is also noted that there remains a significant number of individuals who will be exiting sub-minimum wage employment over the next several months.

Needs/Concerns Identified

- The number of individuals and providers working under 14c certificates has decreased significantly. While DORS has provided the required counseling and guidance to individuals, questions remain regarding the steps the 14c certificate holders will put in place to ensure a total phase out of sub-minimum wage.
- Need to identify where the remaining CRPs are in their transition from sub-minimum wage to Competitive Integrated Employment.
- Need to identify the barriers CRPs and individuals are facing in transitioning individuals into Competitive Integrated Employment.

Methodology: Individual Survey and CRP Survey

Of the CRPs that completed the survey, 31 responders indicated that they serve DDA consumers. Of the eight that reported they are still using sub-minimum wage, six agencies indicated that they are in transition to end the use of sub-minimum wage. Of the six, current needs include benefits counseling and training for jobs. CRPs expressed concerns regarding a need to provide transportation and benefits counseling to individuals and their families, intensive job search, and a more efficient process to obtain authorizations when working with DORS counselors.

Needs/Concerns Identified

- 14c certificate providers are not addressing training needs and opportunities to be included in DORS trainings.
- Benefits counseling information needs to be made available to individuals with intellectual disabilities.
- Assistance is needed with vocational skills training.

Recommendations

- Continue to work with providers to address training needs and opportunities to include providers in DORS trainings.
- Provide benefits counseling to beneficiaries working under 14c certificates once they are referred to DORS.
- Establish a collaborative process with CRPs to assure that vocational training needs for individuals are being met.
- Establish a process to identify the individuals who continue to work under 14c certificates.

Individuals with Severe and Persistent Mental Illness

Information from the 2016 Comprehensive Needs Assessment noted that the utilization of mental health supported employment services varies by county. DORS and BHA have a long-standing collaborative history and work within a well-established braided funding mechanism to assure that services are available and reach the maximum number of participants.

Prevalence

BHA reports that claims paid through April 30, 2019 include 281,179 individuals in Maryland being served by BHA and 3,720 of those individuals are receiving long-term funding for supported employment. The previous 2016 Needs Assessment noted 68,000 individuals receiving BHA services in general. The significant increase in individuals receiving services is due to BHA adding addictions services under their overall service delivery. In the previous needs assessment, those individuals were not included in the general count.

Methodology: BHA and DORS Data Comparison

The results of the comparison are provided in the table below. For each county the table displays the total number of individuals receiving BHA services, the total receiving BHA supported employment funding, the DORS Region, and the total number of CRPs approved both by DORS and BHA to provide services in each county.

County	Total receiving any BHA service	Total receiving BHA supported employment funding 2019	Total receiving BHA supported employment funding 2018	DORS Region	# DORS/ BHA CRPs
Alleghany	6,415	33	25	1	2
Anne Arundel	21,943	243	202	2	3
Baltimore City	40,620	255	364	3	13
Baltimore County	73,228	452	215	5/3	4
Calvert	3,910	101	83	2	1
Caroline	2,422	17	16	2	1
Carroll	6,020	177	157	1	3
Cecil	7,649	27	28	5	1
Charles	5,420	215	141	2	2
Dorchester	3,251	37	28	2	1
Frederick	8,985	167	176	1	1
Garrett	1,784	21	19	1	2
Harford	11,195	24	62	5	2
Howard	6,715	228	202	5	3
Kent	1,257	15	14	5	1
Montgomery	21,722	868	741	6	4
Prince George's	24,734	224	169	6	4

County	Total receiving any BHA service	Total receiving BHA supported employment funding 2019	Total receiving BHA supported employment funding 2018	DORS Region	# DORS/ BHA CRPs
Queen Anne	1,934	34	24	2	1
Somerset	2,158	13	11	2	0
St, Mary	4,810	274	181	2	2
Talbot	1,892	19	12	2	0
Washington	11,556	131	116	1	2
Wicomico	7,682	108	50	2	3
Worcester	3,466	36	18	2	0
Total		**3,720**	**3,054**		

The table below reflects the number of providers by Region, and the number of DORS staff assigned to the behavioral health supported employment providers (including evidence based providers).

Region	Number of BHA CRPs	Number of Staff Assigned to BHA Cases
1 – Western Maryland	5	5
2 – Southern Maryland & Lower Shore	8	8
3 – Baltimore City	14	12
5 – Central Maryland & Upper Shore	10	6
6 – DC Metro	7	8
Total	43	39

Fewer individuals are receiving supported employment services through BHA as compared to 2016. Comparing DORS staff allocations for behavioral health supported employment CRPs, the data appears that DORS has an adequate number of staff assigned to the providers in each Region. Many of the providers have a very large referral base which keeps the caseloads of field staff large as well.

Methodology: Individual Survey and CRP Survey

Forty-two responses were received from the All Disability Groups, Individual Survey. Of those responses, six individuals indicated that they receive supports from BHA. They noted that they receive the following supports from their service provider:

- job development
- help with applications
- extended support services
- housing assistance
- guidance
- transportation

- education

These individuals indicated the supports they receive are adequate. Most indicated the VR services they received helped them prepare for employment. When asked what could have been done differently, the responses were that DORS could have provided benefits counseling, schedule more meetings, and provide a work try-out to see if the individual could perform the tasks of their vocational goal.

Forty responses were received from the CRP survey. Thirty-two respondents indicated that they work with individuals with behavioral health diagnoses. Eighteen indicated that the primary population they serve is behavioral health. Overall, responses indicate a need for an increase in collaboration between DORS and the providers, continued need for benefits counseling, and improved responsiveness from DORS' staff when communicating either through email or by telephone.

Needs/Concerns Identified

- Benefits counseling is needed covering both federal and state benefits.
- Improved communication between providers and DORS' staff.
- Use of alternative methods, such as a work trial, to see if an individual has the ability to perform a position.

Recommendations

- Assure that benefits counseling is offered and provided to individuals served by behavioral health providers, who are beneficiaries, when that individual becomes a consumer of DORS.
- Improve communication DORS staff and providers to enhance the delivery of quality services.

(B) who are minorities;

Individuals with Disabilities Who are Minorities

The 2016 Needs Assessment identified a need for DORS to consider target outreach efforts, in collaboration with workforce and education partners, to increase services to minority individuals with disabilities with emphasis on Hispanic and Asian individuals.

The 2016 Needs Assessment report provided recommendations to increase accessible services for minority individuals with disabilities. The 2016 Needs Assessment also identified the need to develop a catalogue of standard letters in foreign languages to ensure individuals understand services, their rights, and responsibilities during the rehabilitation process. As a result, a variety of brochures, forms, and other materials were made available in Spanish, Korean, Vietnamese, Chinese, and French in 2017 and 2018. These materials are available for staff on the internal intranet and available to the public on the DORS public website. Targeted outreach efforts to increase the number of minorities served by DORS has not been developed. Additionally, DORS

counselors were not provided with information to share with non-citizens regarding the process for an individual to be legally allowed to work in the U.S. DORS continues to be committed to increasing and improving services for minority populations.

Prevalence

According to the 2018 U.S. Census Estimates, 14.9 percent of the population in Maryland are foreign-born. Ten percent (10.1 percent) of the population identified as Hispanic and 6.7 percent of the population identified as Asian. These estimates also show that 18 percent of households speak a language other than English. (www.census.gov/quickfacts/fact/table/md,US/PST045218)

Methodology: DORS Data Review

AWARE data was reviewed to assess the numbers of individuals served by DORS who are of Hispanic or Asian ethnicity (AWARE Report: Participants Served by Ethnicity). Individuals from Hispanic and Asian backgrounds continue to be underrepresented among individuals receiving services. While the number of individuals served by DORS remains low, it is important to note that DORS service levels have remained consistent each year.

Hispanic Individuals Served:

- FY 2016 number served: 755 (3 percent of total served)
- FY 2017 number served: 775 (3 percent of total served)
- FY 2018 number served: 723 (3 percent of total served)

Asian Individuals Served (Asian, Pacific Islander, Native Hawaiian, or Other Pacific Islander):

- FY 2016 number served: 784 (3 percent of total served)
- FY 2017 number served: 801 (3 percent of total served)
- FY 2018 number served: 753 (3 percent of total served)

Methodology: DORS Counselor Survey

Regional Directors from the Office of Field Services (OFS) and the OBVS Director were contacted to identify DORS VR counselor(s) in each Region who would provide information on the efforts and needs of their Region in serving consumers for whom English is a second language. Eleven DORS counselors were contacted and interviewed by telephone.

Needs/Concerns Identified

Staff identified a variety of needs in their Region in regards to serving non-English speaking individuals.

- Staff shared their challenge of ensuring that they provided an adequate explanation of the DORS process and services to non-English speaking individuals.

- Staff were queried on the knowledge and use of the printed materials in different languages available on the DORS intranet. All reported knowledge of the materials and most reported successful use. In addition, staff were aware of the foreign language translation service available and most reported that it was convenient and efficient.
- Staff reported that their primary challenge in assisting non-English speaking consumers with employment is identifying CRPs that provide services to non-English speaking consumers in their native language.
- Staff continue to report that they do not have information to share with applicants who are non-citizens regarding the process for an individual to be legally allowed to work in the U.S.
- No one was aware of targeted outreach efforts in their Region to increase the number of minorities served by DORS.

Recommendations

- Re-establish the Multicultural Access Committee to continue their efforts to ensure equal access to DORS services.
- Task the Multicultural Access Committee with developing a resource list for each Region of available community agencies that provide assistance in completing the Application for Employment Authorization, Form I-765, which is the first step for non-citizens to become legally allowed to work in the U.S.
- Task the Multicultural Access Committee with identifying a resource list for each Region of English for Speakers of Other Languages (ESOL) providers.
- Develop an Agency work group lead by WTC's Academic Services department to explore the option of WTC offering ESOL classes at the Center or in the Regions.
- Develop an Agency work group lead by DORS Community Rehabilitation Programs office to identify CRPs that provide services to non-English speaking consumers in their native language. Ensure that services include an understanding of the complicated VR and job search process. Services should include identifying appropriate training, completing employment applications, and finding a suitable employer.
- Task the Multicultural Access Committee with publishing all information developed as a result of these recommendations on InDORS, the Agency's internal intranet.
- Task the Agency's Staff Development office to arrange a cultural competency training which will ensure that staff have been trained and are better sensitized to the needs of individuals from different racial/ethnic backgrounds.

Before developing outreach efforts to increase the number of minorities served by DORS, the Agency needs to ensure that the resources needed by field service staff have been developed and disseminated. This will contribute to a better employment outcome for minorities served by the Agency.

(C) who have been unserved or underserved by the VR program;

Individuals with Disabilities Who Have Been Unserved, or Who Are Underserved By The VR Program

As with the previous 2013 and 2016 Needs Assessment reports, this assessment has identified underserved and unserved populations for which DORS has been unable to fully meet the statutory requirements outlined in the Rehabilitation Act (i.e., providing VR services to individuals with disabilities). This assessment has identified several contributing factors including: a lack of sufficient resources, the continued utilization of a "Delayed List" for individuals assigned to Order of Selection categories (where a severe functional limitation limits less than three major life activities), productivity issues related to caseloads served by staff with less than three years' VR experience, and complex barriers to employment that differ by population served.

Within the 2019 Needs Assessment, DORS will first seek to define underserved and unserved populations. Second, and unlike in other areas of this assessment or prior needs assessments on this topic, this review focuses not upon consumer survey results or feedback from DORS public meetings, but instead summarizes and draws conclusions based upon several data-sets, both publically available, and from within the DORS case management system AWARE and related systems. And finally, DORS will propose recommendations to address the trends and concerns evident within this data.

For the purposes of this report, "underserved" DORS consumers largely fall within two categories. First, there are those individuals on the DORS Delayed List. Second, those individuals: being served by a VR counselor who has less than three years' experience, or on a caseload which does not have an assigned full-time counselor ("vacant"), or the caseload is being covered by a supervisor or other staff person.

It is also important to identify individuals who are "unserved" by DORS. To address this, one must first identify those individuals with a disability in Maryland who are not served by VR. There are numerous data elements, outlined in the Methodology section below, which presents either a snapshot in time or trends over time. These data elements can be compared to the comparable periods of service for DORS consumers, thus identifying the total population available "to be served," those being served by DORS, and the remainder being "unserved."

Methodology: Review of Relevant Data

- U.S. Census and the American Community Survey 2017; and the Cornell University 2017 Disability Status Report: Maryland.
    - 447,161 (7.4 percent) people in Maryland self-identify as having a disability, and are under the age of 65 (2013 - 2017)
        - 42.6 percent (190,490) Employment rate of working age people (ages 21-64) with disabilities
            - 9.4 percent (42,033) actively looking for work among working age people with disabilities
    - 21.5 percent (96,139) the Poverty Rate of working age people with disabilities
    - Educational Attainment in 2017, the percentage of working age people with disabilities:

        - 32.5 percent (145,327) with High School diploma or equivalent
        - 29.1 percent (130,123) with some college or Associate's degree
        - 19.3 percent (86,302) with Bachelor's degree or more
- Maryland students in high school with an Individual Education Plan (IEP)
    - 27,219 (for the 2017 - 2018 school year).
- Social Security Administration (SSA) data
    - Ticket Holders being served by DORS January 2016 - April 2019 (as a percent of all Ticket holders in Maryland via SSA's Ticket Tracker Monthly data)
        - 2014: average of 3.71 percent of Assignable Tickets assigned to DORS
        - 2016: average of 4.37 percent of Assignable Tickets assigned to DORS
        - 2017: average of 4.31 percent of Assignable Tickets assigned to DORS
        - 2018: average of 4.34 percent of Assignable Tickets assigned to DORS
        - 2019: average of 4.46 percent of Assignable Tickets assigned to DORS
- As of 6/2019, 1,126 Ticket Holding individuals are on the waitlist
- Review of DORS-based data
    - DORS Counselors
        - As of June 2019, there are 133 full time (non-contractual) counselors in OFS and 13 counselors in OBVS
        - Since January 2017, 61 new counselors were hired
    - DORS Waiting List numbers
        - October 2015, the Wait List was 2,697 individuals with a wait of 17 months
        - April 2019, the Wait List was 2,505 individuals with a wait time of 32 months
        - Numbers peaked between April and July 2017, when the list totaled 4,086 individuals with a wait time of 39 months
    - Barriers to Employment data; specifically, those consumers who applied (October 2016 or later), were found Eligible and placed on the Waiting List.
        - Homeless - 41
        - Long Term Unemployed - 653
        - Will exhaust TANF in two years - 5
    - Consumers 18 years old and younger (July 2017 – June 2018)
        - Pre-ETS - 1,500
            - Closed - 70
            - Still open - 1,430
        - Pre-ETS VR – 317 of 1,500
            - Closed - 19
            - Still open – 298
    - DORS Benefits Planning Usage Statistics
        - Benefits Planning Usage Statistics for the provision of benefits planning to eligible beneficiaries for cases "Closed" (Successful or Unsuccessful) in the FYs which correspond to the 2013, 2016, and current 2019 Needs Assessment reports (data from proprietary DORS systems and AWARE database):
            - FY2013: 22 percent received benefits planning
            - FY2016: 31 percent received benefits planning
            - FY2019 YTD: 38 percent received benefits planning

Needs/Concerns Identified

- Presuming all 61 recently hired VR counselors remained with DORS (which is not the case), 42 percent of VR counselors have two years or less of DORS work experience serving consumers. On average, VR counselors take two years to begin to understand the federal/state VR program (consumers underserved).
- Supervisors and VR counselors are assigned caseloads left "vacant" when VR counselors vacate the position, in addition to maintaining their own supervisory duties and/or caseloads (consumers underserved).
- There are far more individuals with disabilities than DORS has the capacity to serve.
    - There are 256,670 working age (21-65) adults with disabilities who are not employed; 42,000 of these individuals are actively looking for employment (consumers unserved).
    - Of the 27,219 students with disabilities (2017-2018), DORS provided services to 3,207 students in 2017 and 3,640 students in 2018 (consumers unserved).
    - Only 4.46 percent of all SSA Ticket Holders in Maryland are currently receiving services from DORS.
- For more than the past six years, fewer than 50 percent of SSA beneficiaries eligible for benefits planning services received this service from DORS (consumers underserved).
- Forty-two percent (42 percent) of individuals currently on the DORS Waiting List have a Social Security "Ticket to Work" waiting to be assigned to an Employment Network (consumers underserved).
- Over the past five years, fewer than five percent of individuals with a Social Security "Ticket to Work" had their ticket assigned (consumers unserved).
- Disabled individuals with significant barriers to employment (long-term unemployment, homelessness, exhausting TANF) are waiting for services from DORS (consumers unserved).

Recommendations

- Increase the number of full-time VR counselor positions across the state, to provide an effective and manageable caseload distribution. One of the stated reasons for resignation, as cited by VR counselors, is the high number of cases on each caseload. High caseload size negatively impacts the VR counselor's ability to effectively serve individuals.
- Increase the number of VR counselors who serve students and transitioning youth, to accommodate an anticipated increase in the number of student referrals to the DORS VR and Pre-ETS programs.
- Continue to include benefits planning service for consumers who receive SSI/SSDI benefits. Develop a method for tracking those individuals who receive SSI/SSDI and are declining benefits planning service (i.e., previously received this service, received this service from a different Employment Network provider) to gain more accurate data regarding provision of this service.
- When individuals are placed on the DORS Waiting List, require that they are given referral information to the closest and most relevant WIOA partner. Similarly, in the case of Social

Security beneficiaries, provide referral information to the closest and relevant Employment Network.

- Develop an intra-agency mechanism to share basic consumer information between WIOA partners which will ensure a smooth referral process between WIOA partners thus allowing the tracking of the individuals' progress.
- Develop a work group to study those consumers who receive SSI/SSDI and are on the DORS Waiting List, to determine if the Order of Selection should be adjusted to Category 1.
- Consider further and future assessment strategies to determine whether the barriers to access VR services or the lack of knowledge of VR services contribute to populations being unserved/underserved.

(D) who have been served through other components of the statewide workforce development system; and

Individuals with Disabilities Served Through Other Components of The Statewide Workforce Investment System.

In October 2015, Governor Larry Hogan determined that Maryland would have a combined state plan under the requirements of WIOA. MD Labor, DHS, and MSDE collaborated to develop the operational components of Maryland's workforce system plan.

In 2018, the State's workforce plan was revised and expanded the number of partners and resources to be included in Maryland's workforce network. DHCD's Community Services Block Grant program, the MD Labor DUI, and SCSEP were formally added into Maryland's Combined Plan.

In 2020, the local grantees for the REO program are: Family Health International; Goodwill Industries International, Inc.; Living Classrooms Foundation; Volunteers of America Chesapeake, Inc.; and Structured Employment Economic Development Corporation.

Programs included in the plan:

WIOA State Plan Program	Core WIOA Program as determined by law	Additional WIOA Program as determined by Governor	MD State Agency Responsible for Oversight
Adult Program	✓		MD Labor
Dislocated Workforce Program	✓		MD Labor
Youth Program	✓		MD Labor
Wagner-Peyser Act Program	✓		MD Labor
Adult Education and Family Literacy Act Program	✓		MD Labor
VR Program	✓		MSDE
TANF Program		✓	DHS

WIOA State Plan Program	Core WIOA Program as determined by law	Additional WIOA Program as determined by Governor	MD State Agency Responsible for Oversight
Trade Adjustment Assistance for Workers Program		✓	MD Labor
JJVSG Program		✓	MD Labor
UI		✓	MD Labor
SCSEP		✓	MD Labor & Senior Service America, Inc.
REO		✓	Local partners
CSBG		✓	DHCD

Maryland AJCS

Prevalence

During the previous three years, the Agency has seen a decrease in individuals reporting that they were referred by the AJCs. In 2016 to 2018, 244 individuals were referred; in 2013 to 2015, 862 individuals were referred. This is a significant decrease of 618 individuals. These statistics are garnered from the AWARE Referral Module, where staff entering referrals help the individual select their referral source; "One-Stop Center" is one choice.

To assess how effectively DORS staff are collaborating with the Maryland AJCs, two separate surveys were distributed: one to AJC Personnel and one to DORS staff.

Methodology: DORS Survey of AJC Personnel

Sixty-eight surveys were completed by individuals who work in AJCs. The survey results follow:

- 94 percent of respondents indicated that they were aware of the services provided through DORS to individuals with disabilities to help them develop employment-related skills.
- 79 percent of respondents reported that they have referred individuals to DORS for services.
- Respondents were asked to select the referral methods they used:
    - 73 percent providing contact information (DORS office location, phone number, etc.) to individuals
    - 37 percent facilitating in-person introductions to DORS Staff
    - 14 percent DORS online referral
    - 10 percent universal referral form
    - 2 percent other options.
- When asked if the referrals resulted in the referred individuals receiving services through DORS:
    - 37 percent were aware
    - 52 percent did not know

    - 7 percent were unaware.
- In response to whether they have any customers who are receiving services from both the AJC and DORS, respondents reported that 61 percent did not, while 39 percent indicated that they had customers receiving services from both agencies.
- Respondents were asked to comment on the manner in which they document services provided by DORS for mutual customers in their case management system, MWE.
    - 35 percent enter a case note in MWE
    - 10 percent document in the Individual Employment Plan
    - 10 percent do not document DORS services.
- When asked if they meet with DORS staff regarding mutual customers to collaborate on services, 78 percent indicated they do not, while 22 percent indicated they do.

Methodology: Survey of DORS Staff

Including VR supervisors and counselors, employment specialists, and business services representatives regarding their knowledge of AJC services, referrals to AJCs, and documentation of referrals.

Fifty-nine DORS staff completed the survey with the following results:

- Respondents represented various positions within DORS:
    - 67 percent counselors
    - 12 percent supervisors
    - 7 percent business services representatives
    - 2 percent WTC employment specialists
    - 12 percent other classifications, including regional director, administrative specialist, secretary and teacher for the blind.
- When asked if they were aware of the variety of services available through the AJCs, 80 percent indicated “Yes” and 20 percent responded “No.”
- 83 percent of the respondents indicated that they have referred DORS consumers to an AJC for services and 17 percent indicated they have not.
- Respondents indicated they have used the following referral methods:
    - 86 percent provided contact information for AJC (location, phone number, etc.)
    - 37 percent provided in-person introduction to AJC staff
    - 29 percent used the MWE
    - 12 percent used the universal referral form
    - 4 percent used another method.
- 80 percent of respondents reported that referrals resulted in individuals receiving services through the AJC and 20 percent indicated they had not.
- 64 percent of those with caseloads indicated they had consumers on their caseload who were receiving services from both DORS and an AJC, while 36 percent indicated they did not.
- Respondents were asked to comment on the manner in which they document services provided by the AJC in AWARE. Of the 19 responses to this question, 75 percent indicated that they documented in a case note or job search activity and 16 percent indicated they documented under “Special Programs.”

- 63 percent reported that they did not meet with AJC staff regarding mutual customers to collaborate on services and 37 percent indicated they did.

These two surveys indicate increased knowledge about and collaboration between the AJCs and DORS. During the 2016 Needs Assessment, only 15 AJC staff completed the survey compared to 74 respondents this year. In 2016, 73 percent of AJC staff indicated they were aware of DORS services, compared to 94 percent during this survey. Although DORS staff were not surveyed for this purpose in 2016, 80 percent indicated they are aware of the services available through the AJCs on this year's survey.

Needs/Concerns Identified

- Despite the apparent increase in collaboration between AJC and DORS staff based on the surveys, there is a decline in AJCs being selected as the referral source for new referrals in AWARE.
- There does not appear to be a specific or consistent way for either DORS staff or AJC staff to document referrals or collaboration.
- The definition of what is considered a "referral" is broad, from simply providing a phone number to a formal form or in-person introduction. Additionally, due to differences in terms, it is uncertain if staff are referring to the same things when discussion services.

Recommendations

- Determine the reason for the decline in selecting AJCs as a referral source and provide guidance to staff on appropriate referral documentation (i.e., is terminology consistent).
- Consider methods for tracking collaboration with AJCs in the DORS AWARE system, such as creating a case note category of "AJC Collaboration."
- Provide training to DORS staff on appropriate timing and method of referrals to AJCs.
- Collaborate with AJCs on appropriate timing and method of referrals to DORS.
- Continue to explore data sharing between agencies to assist in identifying common consumers and collaborating on services provided.

Other Workforce Programs

Prevalence

During the 2019 Needs Assessment, DORS utilized a variety of methodologies to assess the number of individuals with disabilities in Maryland served by partner programs identified within the Maryland State Combined Workforce Plan.

Methodology: Literature Review – MD Labor Annual Report/Statistics

The MD Labor DWDAL provided the following statistics regarding the number of individuals with disabilities who accessed services through WIOA programs.

During Program Year 2017:

- WIOA Title I Adult Program served 345 individuals with disabilities.
- WIOA Title I Dislocated Worker Program served 69 individuals with disabilities.
- WIOA Title I Youth Program served 477 youth with disabilities.
- WIOA Title II Adult Education and Literacy Services Program served 994 individuals with disabilities.
- WIOA Title III Wagner-Peyser Program served 2,750 individuals with disabilities.

Methodology: DORS and DHS Data Review

The DORS AWARE case management system indicates the number of consumers who reported receiving financial support from DHS when they applied for VR services, including TANF or General Assistance.

- FY 2017: 406
- FY 2018: 423
- FY 2019 YTD: 274

This is a decline from the 2016 Needs Assessment, where an average of 650 consumers each year reported receiving financial support from DHS.

Needs/Concerns Identified

- There was a significant decline in the number of individuals with disabilities reported as served by MD Labor-DWDAL from those reported on the 2016 Needs Assessment. The difference can be attributed to the fact that during the 2016 Needs Assessment, MD Labor was still operating under Workforce Investment Act and all participants, including those who only had self-services or received information, were included in the count. From program year 2016 onward, under WIOA, only those receiving staff-assisted services are included in the participant counts. Additionally, some participants may be reluctant to disclose a disability when working with staff at the AJCs.
- It is difficult to track common customers of the various workforce partners and to document collaborative services. Despite the fact that DORS is working more collaboratively with MD Labor and AJCs, the data does not show that collaboration.

Recommendations

- Continue to foster and strengthen relationships with MD Labor, DHS, and other partners included in the state plan.
- Continue to look for ways to strengthen data sharing among partners.

Apprenticeship

Methodology: Literature Review

The 2019 Needs Assessment committee members reviewed the U.S. Department of Labor Office of Disability and Employment Policy (ODEP) research and data regarding apprenticeship opportunities for individuals with disabilities. The following literature resources were used:

1. ODEP website- Disability Employment Policy Resources by Topic of Apprenticeship: www.dol.gov/odep/topics/youth/Apprenticeship.htm
2. U.S. Department Of Labor FY 2018-2022 Strategic Plan: www.dol.gov/sites/default/files/budget/2019/FY2018-2022StrategicPlan.pdf
3. The 2020 Federal Youth Transition Plan: A Federal Interagency strategy: www.dol.gov/odep/pdf/20150302-fpt.pdf

- In the FY 2018-2022 strategic plan, the U.S. Department of Labor identified apprenticeship as a performance goal for particular focus in FY 2018-19. The goal is to enroll one million new apprentices (including registered programs, industry-recognized apprenticeships, and other non-registered programs) over the next five years to enable more Americans to obtain jobs that pay a family-sustaining wage through high quality earn-and-learn opportunities. By September 30, 2019, MD Labor will enroll 280,000 new apprentices as part of the Agency's broader efforts to promote and expand apprenticeship.
- The current MD Labor Strategic Plan documents evidence that supports expanding high-quality apprenticeship opportunities across sectors, including manufacturing, transportation, information technology (IT), health care, and the skilled trades. MD Labor's data indicates graduates of RA programs earn an average of $60,000 per year, and more than eight in ten graduates retain their employment nine months after exiting their apprenticeships.
- Since January 2017, the apprenticeship system has added 303,157 new apprentices, with 61,165 coming in the third quarter of 2018. In total, there are 556,495 active apprentices and 23,126 apprenticeship programs nationwide.
- In 2016, the federal MD Labor's Apprenticeship Equal Employment Opportunity Regulations were updated to ensure equal employment opportunities in apprenticeship programs for under-represented groups, including people with disabilities. Previous regulations did not include nondiscrimination or affirmative action requirements on the basis of disability. The final rule added disability as an element of sponsors' affirmative action programs and established a national goal that seven percent of programs' apprentices be individuals with disabilities.

Needs/Concerns Identified

- Historically, apprenticeship opportunities for individuals with disabilities have been limited.
- There is limited collaboration, coordination, and cooperation among youth and adult service systems, state education agencies, state VR and workforce development agencies, schools, and youth with disabilities and their families to assist students with disabilities in achieving their postsecondary education and career goals.
- There is a service gap between youth and adult programs to encourage and expand opportunities for students and youth with disabilities up to age 24 (e.g., dual enrollment, internships, mentorships, apprenticeships, and postsecondary training options).

- During transition planning, there is limited encouragement provided to students with disabilities to consider apprenticeship programs.
- There are limited efforts to promote apprenticeship training through community college to help reduce costs for RA sponsors and youth and adults with disabilities.
- Need to increase outreach and recruitment efforts and tracking of apprenticeship participation and success.
- Employer impressions of individuals with disabilities in general may still be limiting the number of apprenticeship opportunities available to youth and adults with disabilities.

Recommendations

- Expand and continue the collaboration with the Maryland Apprenticeship Think Tank to increase the number of individuals with disabilities participating in Youth, Pre-Apprenticeship and RA programs, and outreach to WIOA partners.
- Utilize the members of the Maryland Apprenticeship Think Tank to identify community colleges and other approved labor vendors to provide training for a variety of Apprenticeship programs (including Youth, Pre-Apprenticeship and RAs) for individuals with disabilities.
- Develop strategies with the MD Labor to promote and educate VR staff and partners such as consumers and their families, schools, Community Rehabilitation Programs, Pre-ETS' providers, career assessment providers and other DORS vendors about apprenticeship.
- Develop strategies and outline roles and responsibilities for DORS statewide staff related to expanding apprenticeship education and opportunities.
- Expand knowledge of and partner with MSDE staff to support the goal of Apprenticeship Maryland which creates compensated, high quality youth apprenticeships that prepare students to enter employment in high-skilled, high-growth sectors in manufacturing and STEM occupations such as healthcare, biotechnology, IT, construction and design, and banking and financing.
- Promote collaboration, coordination, and cooperation among youth and adult service systems, state education agencies, state VR and workforce development agencies, schools, and youth with disabilities and their families to assist students with disabilities in achieving their postsecondary education and career goals.
- Explore ways to use WTC in collaboration with other core WIOA partners to expand and develop Pre-Apprenticeship and RA training programs in key industries supported by MD Labor.
- Review and outline the roles and responsibilities of DORS statewide staff, including WTC, in order to support consumers participating in Youth, Pre-Apprenticeship and RA.
- Expand the development of policy and implement training for the tracking and documentation in AWARE of Youth, Pre-Apprenticeship and RA services.
- Develop strategies to increase the number of businesses offering apprenticeships in growth industries in Maryland in collaboration with WIOA partners.

Apprenticeships and Maryland Community Colleges

In 2019, the American Association of Community Colleges (AACC) and the U.S. Department of Labor launched the Community College Apprenticeships Initiative, which will produce 16,000

new apprentices over the next three years. Colleges can join this partnership, which will use $20 million in federal funding to help create apprenticeships.

While strides have been made partnering with community colleges, there are additional objectives to be met, including advancing apprenticeship as a workforce strategy. Working with community colleges to expand the scope of services provided through RA programs could help state and local workforce systems transform how they meet the needs of businesses and workers fully achieving the vision of WIOA.

Maryland Apprenticeship Think Tank

The Maryland Apprenticeship Think Tank was developed in January of 2018 and is a network of professional organizations committed to expanding apprenticeship opportunities to individuals with disabilities. Through a diverse array of initiatives – research, education, public engagement, and on-the-ground innovation and practice – the Think Tank shares information on emerging trends and opportunities, best practices in apprenticeship and highlight how apprenticeship can break into new industry sectors and serve a more diverse population of VR individuals. The Maryland Apprenticeship Think Tank members consist of a variety of leaders from DORS, including WTC, along with MD Labor, Maryland Department of Disabilities, the Community College of Baltimore County and community program providers such as, the ARC who are collaborating to secure lasting change in the area of Youth, Pre-Apprenticeship and RA at the State and local level.

Methodology: Maryland Apprenticeship Think Tank Members Focus Group and a survey of attendees from the DORS Apprenticeship Training.

During the May 2019 Maryland Apprenticeship Think Tank meeting, members were asked several questions regarding how to better serve individuals with disabilities through other components of the statewide workforce investment system such as AJCs, other workforce programs, employers, and Maryland Community Colleges.

Needs/Concerns Identified

- Identification of an organizational structure within DORS for the delivery of Apprenticeship services.
- Limited availability of statewide Pre-Apprenticeship programs in Construction/Electrical/ Plumbing and IT.
- Need for expansion of RA programs in collaboration with businesses and community colleges.
- Lack of methods and strategies for the tracking and sharing of apprenticeship data between DORS, community colleges and WIOA partners.
- Need representation from MSDE for participation on the Maryland Apprenticeship Think Tank.
- Systems are limited for the collaboration and communication between MSDE and DORS related to Youth Apprenticeship.

- Lack of consumer and staff knowledge regarding apprenticeship programs and services available statewide.

Recommendations

- Explore the Agency's capacity and staff resources for the expansion of Apprenticeship Navigation Services at WTC that will be responsible for the coordination and implementation of apprenticeship services such as, collaboration with community colleges, WIOA partners, statewide and local trainings, facilitation of consumer services related to apprenticeship consults and linkage to statewide apprenticeship training, etc.
- Explore development of Pre-Apprenticeship programs at WTC or in partnership with community colleges and other workforce partners.
- Continue collaboration with CVS, MD Labor, and the Community College of Baltimore County to develop a RA program for Pharmacy Technician at the WTC.
- DORS should continue its efforts to develop a system for data sharing agreements between MD Labor, Community Colleges and DORS for apprenticeship, employment and credentialing information.
- Identify representation from MSDE and the new Apprenticeship Coordinator from the Community College of Baltimore County for participation on the Maryland Apprenticeship Think Tank.
- Develop a system to enhance the collaboration and communication between MSDE's Career and Technology Education Instruction branch and DORS staff serving transitioning youth.
- Work with the DORS Office of Public Affairs to explore and develop marketing strategies to enhance staff and consumer education and awareness about apprenticeships including but not limited to, YouTube videos for staff and consumers, WTC Instagram, podcast, webinars, training sessions at various conferences and schools, information packets, etc.

Employers

Although employers are not a workforce program under WIOA, they are integral partners and customers in a job-driven and business-responsive workforce system. It was determined that they should be included in the 2019 Needs Assessment to highlight their needs which affect the preparation and employability of job seekers with disabilities.

Methodology: Literature Review – 2018 Maryland WIOA State Plan, Labor Market Information

Labor market information summarized in the 2018 Maryland WIOA State Plan (pages 12-22) highlights the needs of Maryland's employers, especially those in growth and emerging industries. Construction of buildings experienced an 8.7 percent gain in employment from 2015 to 2016, while the professional and technical services industry gained the most growth of 4,704 jobs, bringing the average employment in that industry to 246,864.

Skilled workers for healthcare, IT systems and design, management, and administrative occupations are at the top of Maryland's major business needs. Jobs most advertised through the MWE in 2016 included those in the following occupational categories:

- Healthcare Practitioners and Technical
- Computer and Mathematical
- Management
- Sales
- Office and Administrative Support
- Architecture and Engineering
- Transportation and Material Moving
- Business and Financial Operations
- Food Preparation and Serving
- Installation, Maintenance and Repair.

These represented jobs requiring all levels of education and experience, from no minimum education requirement, high school diploma or equivalent, to bachelor's degree.

In 2017, the certifications that employers desired most based on advertised job postings on the MWE included those in Healthcare, such as Cardiopulmonary Resuscitation (CPR), Basic Life Support Certification (BLS), Advanced Cardiac Life Support Certification (ACLS), Certified Nursing Assistant (CNA), and Pediatric Advanced Life Support (PALS); Information Technology, including Certified Information Systems Security Professional (CISSP) and Cisco Certified Network Associate (CCNA); and Commercial Driver's License (CDL).

Methodology: Literature Review/Focus Groups

Business Roundtable Report: Employment Engagement in VR; U.S. Department of Education, Office of Special Education and Rehabilitative Services, Rehabilitation Services Administration; 12/26/16.

In response to the WIOA's focus on employer engagement as it relates to the employment of individuals with disabilities, the Rehabilitation Services Administration (RSA) conducted a series of roundtable discussions to gain insight in the following areas within businesses': human capital needs and challenges, skill needs and job requirements, recruitment strategies, and methods to employ more job seekers with disabilities. Businesses from four industry sectors (federal contracting, banking and finance, health care, and IT) were included and represented small, medium, and large companies. These are high growth and employment industries with diverse occupations that require varied skill levels.

The roundtable discussions revealed the importance of VR agencies partnering with employers to increase the understanding of specific industries and businesses, especially their human capital needs. "Soft skills" such as communication and interpersonal skills were identified as critical to retention, advancement, and long-term success by those participating in the roundtable discussions across all industries.

Some of the industry-specific findings included:

- Federal contractors are not meeting their requirement to have a workforce that includes at least seven percent of employees with disabilities.
- There is a high turnover of millennial-age employees.
- STEM skills needed.
- High degree of interpersonal skills required.
- Health care employers indicated that roles in hospitals extend beyond just health care, including physical plant and hospitality roles. Although there is a need for experienced employees, the low supply of skilled staff in a local labor market and high turnover can result in hiring inexperienced individuals and higher wages.
- Banking and finance employers need large numbers of qualified candidates and especially require those with competencies in "soft skills."
- IT employers are experiencing retention challenges, and skill requirements evolve rapidly. There is a need for highly specialized software skills. Federal IT contracts require very specific qualifications and are stricter than those in the commercial IT sector.

Recommendations resulting from the roundtable discussions included: align training for job seekers with disabilities with job opportunities; promote awareness of VR agencies and the advantages of partnering to recruit individuals with disabilities (including financial incentives); expand employer engagement and relationship building; and invest in VR staff development on topics of labor market and occupational information in career planning and IPE development, employer consultation on accommodations, and developing customized training designed to meet the needs of specific employers.

Needs/Concerns Identified

- There continues to be a significant employment gap for individuals with disabilities as compared to job seekers without disabilities.
- Development of "soft skills" or essential workplace skills is critical to successful employment, regardless of industry or occupation.
- Use of labor market information is extremely beneficial in career counseling and guidance while also identifying varying levels of preparation required for occupations in industries which have a bright outlook.
- Job seekers need to increase their use of labor market information so that they can better match their skills to the employers' needs.
- Additional training, resources, and tools for DORS staff relative to use of LMI are needed.
- Expansion of certification and credentialing, especially in the healthcare and IT industries is needed to make job seekers more marketable.
- Employers in some industries are experiencing problems of retention, high turnover and lack of qualified candidates.

Recommendations

- Expand employer engagement to better understand businesses' human capital needs in order to prepare job seekers for the workforce.

- DORS should use every avenue available to ensure that consumers have opportunities to learn, develop, practice and hone "soft skills."
- DORS should use varying methods of educating staff and consumers about where to find and how to use labor market information.
- The DORS Business Relations Branch should sponsor industry-specific and employer-specific career information sessions, open to staff and consumers.
- Work with the DORS Office of Public Affairs to expand marketing activities to employers that promote the advantages of collaborating with DORS to meet their workforce needs, including recruitment and retention services and designing customized or business-driven training.

(E) who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services. 1. Their Need for Pre-Employment Transition Services (Pre-ETS) or Other Transition Services.

Youth with Disabilities and Students With Disabilities

Prevalence

The need for Pre-ETS and other transition services in Maryland is most evident when reviewing the post-school outcomes of students receiving Special Education, as reported on the Maryland Report Card. In 2018:

- 13.9 percent of students in grades 9-12 receiving Special Education services and 6.7 percent of students in grades 9-12 receiving services under a 504 plan dropped out of school, compared to 8.3 percent of students in regular education.
- 66.8 percent of the Class of 2018 students receiving Special Education services and 88.4 percent of students receiving services under a 504 plan graduated high school, compared to 87.1 percent of students in regular education.
- 41.5 percent of students who received Special Education services in high school were attending college 16 months post high school, compared to 72.1 percent of students who were in regular education.

Theoretically, youth with disabilities and students with disabilities receiving Pre-ETS services would increase their opportunity to remain in high school, and pursue post-secondary education or employment if they received training in self-advocacy and independent living.

2. Assessment of the Needs of Individuals with Disabilities for Transition Services and Pre-ETS & the Extent to Which Such Services Are Coordinated with Local Education Agencies, Other Education Systems (to include Juvenile Services Education System, Maryland School for The Deaf, and Maryland School for The Blind), and Workforce Partners

DORS would like to continue to assess the current 2019 need for Pre-ETS statewide, as well as the availability of such services. As a result of WIOA, DORS is now required to set aside at least 15 percent of the federal allotment to provide Pre-ETS to students with disabilities between the

ages of 14 and 21, and are to be available to all students with disabilities regardless of the severity of their disability.

Pre-ETS are very specific in nature and include the following:

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs
- Workplace readiness training to develop social and independent living skills
- Instruction in self-advocacy, including peer mentoring

DORS continues to review proposals submitted by community rehabilitation programs (CRP), secondary schools, workforce partners, and colleges and universities, desiring to offer Pre-ETS as a fee-for-service. The current statewide number of partners providing DORS-funded Pre-ETS programing is listed below:

- Region 1 (Western Maryland) has 26 CRPs, one secondary school, two colleges, four workforce partners, and 11 other partners (to include centers for independent living, community work incentives coordinators (CWIC), and out-of-state programs for students who are deaf).
- Region 2 (Southern Maryland & Lower Eastern Shore) has 28 CRPs, six secondary schools, three colleges, one workforce partner, and 13 other partners (to include centers for independent living, CWICs, and out-of-state programs for students who are deaf).
- Region 3 (Baltimore City) has 14 CRPs, two secondary schools, one college, two workforce partners, and 11 other partners (to include centers for independent living, CWICs, and out-of-state programs for students who are deaf).
- Region 5 (Central Maryland & Upper Shore) has 25 CRPs, three secondary schools, two colleges, two workforce partners, and 12 other partners (to include centers for independent living, CWICs, and out-of-state programs for students who are deaf).
- Region 6 (D.C. Metro) has 23 CRPs, two secondary schools, no colleges, two workforce partners, and ten other partners (to include centers for independent living, CWICs, and out-of-state programs for students who are deaf).

DORS seeks to use this Needs Assessment to acquire a better understanding of the numbers of potentially eligible VR consumers who will be participating in these services over the next few years, as well as, which Local Education Agencies (LEA) are already providing these services, and where there may be opportunities for collaboration.

Methodology: Survey of Local Education Agencies (LEAs) and Other Education Systems

Surveys were sent to each of the LEAs and other educational systems to determine:

1. Which of the five Pre-ETS programs are currently provided by the schools as part of secondary transition.
2. Of those services provided, which can be further enhanced by partnering with DORS.

3. Which services are not currently available in their respective geographical areas.
4. Is the coordination of transition services between DORS and the LEA and other education systems perceived as sufficient to meet the needs of all students with disabilities within that LEA and other education systems?

Twenty-three LEAs and other education systems indicated that they refer students to DORS. The information summarized below represents the responses received from 20 of the local education agencies surveyed, Maryland School for the Deaf, Maryland School for the Blind, and the Juvenile Services Education System.

Needs/Concerns Identified

- Coordination of transition services between DORS and the LEAs or other education systems was not sufficient to meet the needs of all students with disabilities.
- There is a disconnect between the time a DORS referral is made and actual contact with families.
- Not all students with disabilities are being reached by DORS (specifically with students and families speaking languages other than English).
- There is a lack of communication between DORS Transition Counselors and LEA Transition Facilitators or IEP chairs.
- There is a limited number of Pre-ETS programs for all disability populations in rural areas.
- There are not enough DORS Transition Counselors to work with all students with disabilities.
- CRP partners working with students have limited training and experience in providing services to students.
- Once Pre-ETS programs are in place for students, DORS outreach regarding VR services is limited (not all of the eligible VR students are applying for VR services).
- School staff often have difficulties accessing DORS Transition Counselors for participation in student IEP meetings.
- There are limited Pre-ETS programs that are available for students who are Blind or Visually Impaired.
- There are limited Pre-ETS programs that are available for students who are Deaf or Hard of Hearing.
- Education systems that have worked with students across the state have had the experience of DORS transition counselors operating differently depending on the area of the state.
- DORS transition counselors with large caseloads limit their capacity to partner with LEAs and other education systems or participate in student IEP meetings.
- There is a lack of communication with LEAs and other education systems regarding the local availability of specific Pre-ETS programs.
- DORS appears to be restricted due to the supplanting concerns in its ability to provide services to 18-21 year old students, specifically services during the school day.
- There are limited updates and communication from DORS regarding status of student referrals and services that they may receive through DORS.

Methodology: Data Collected Was Based on The Number of Potential Pre-ETS Applicants Statewide Utilizing Both Data Provided by MSDE and Data Found on The Maryland Report Card.

High School Students with Individualized Education Plans (IEP) in 2018 (Source: MSDE)

Grade	Students
9th	9,647
10th	7,282
11th	6,353
12th	3,950
Total	**27,232**

Total Number of Students Potentially Requesting Pre-ETS in FY 2019: 27,232.

This number is not inclusive as the number of high school students with 504 plans in 2018 was not available at this time.

Needs/Concerns Identified

- It is anticipated based on data collected that the number of students accessing DORS services will increase each year.
- It is anticipated that DORS will not be able to access all students with 504 plans due to limited collaboration between DORS and school staff monitoring 504 plans.
- It is anticipated that the number of students with intellectual and/or developmental disabilities accessing DORS services will increase each year as a result of WIOA requirements related to Section 511 and the closing of the 14c programs.
- It is anticipated that DORS transitioning caseloads will continue to grow each year.

Methodology: Survey Of Local Workforce Partners

Surveys were sent to each of the local workforce partners to determine

1. How and if the local workforce partners are collaborating and partnering with DORS to serve transitioning youth and students with disabilities.
2. What DORS assistance or services are expected to benefit transitioning youth and students with disabilities served by workforce partners.
3. What services are being offered to transitioning youth and students with disabilities through the workforce partners.

The information summarized below represents the responses received from seven of the local workforce partners surveyed:

- Anne Arundel County
- Baltimore County
- Carroll County

- Frederick County
- Howard County
- Montgomery County
- Upper Shore

All seven respondents currently collaborate or partner with DORS in some way to provide services to students with disabilities. Six of the respondents refer transitioning youth and students with disabilities to DORS for services, but it was noted that these referrals are not submitted often.

Of those individuals who responded to the survey, their comments are noted below regarding collaboration with DORS:

- During the course of the year, DORS staff meets with workforce partners to discuss strategies to better serve transitioning youth in the area.
- DORS collaborates with Anne Arundel and Montgomery Counties for Maryland's Disability Employment Initiative grant.
- Frederick and Howard Counties and the Upper Shore partner with DORS to provide summer youth experiences for transitioning youth and students with disabilities.
- DORS staff meets with Carroll County's AJC at least twice per month.
- Baltimore County and DORS have coordinated meetings regarding consumer services.
- DORS provides Baltimore County with regular referrals.

Needs/Concerns Identified

- Increase the number of DORS referrals from the workforce partners.
- DORS needs to provide education and disability awareness regarding how to work with specific populations to the workforce partners.
- DORS needs to provide technical assistance regarding summer youth experiences and work experience placement for students with disabilities to the workforce partners.

Recommendations

- DORS needs to continue to expand the availability of Pre-ETS statewide specifically in rural areas for students who are Deaf or Hard of Hearing, Blind or Visually Impaired, and intellectually or developmentally disabled. Instructional areas should focus on self-advocacy and counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs.
- DORS needs to align its staffing and caseload assignments to have sufficient DORS Transition Counselors available to coordinate the provision of Pre-ETS and collaboration with LEAs and other education systems.
- DORS needs to revisit best practices in outreach to students and families who speak languages other than English.
- DORS needs to improve its practices in connecting potentially eligible students to the VR program in their next-to-last year of high school.

- Local agreements between DORS and LEAs should be updated to address concerns (e.g., identifying a communication process regarding student's referrals and Pre-ETS available in the local area).
- DORS needs to identify quality assurance concerns in the provision of Pre-ETS through workforce partners.
- DORS should continue to provide staff training and information dissemination to ensure that staff are operating within standard policies and procedures across the state.
- DORS should collaborate with 504 coordinators in each LEA to address the difficulties of accessing students with 504 plans.

3. Assessment of the Needs of Transitioning Youth with Disabilities Entering Two- and Four-year Colleges & the Extent to Which Such Services Are Coordinated with College Disability Support Services Staff

DORS would like to evaluate how effectively the Agency collaborates with Disability Support Services (DSS) staff to meet the needs of transitioning students with disabilities entering, or planning on entering, two- and four-year colleges.

Methodology: Disability Support Services Professionals Survey

An on-line survey of LDSS professionals was used to evaluate how effectively DORS collaborates with LDSS staff to meet the needs of transitioning students with disabilities. This survey was sent directly to members of the Maryland Association of Higher Education and Disability (MD-AHEAD). Twenty-two individuals provided responses to the survey questions.

Needs/Concerns Identified

- DORS staff need to understand which assessment data from student high school records meets the requirements of LDSS staff.
- Many students making the transition to college are not aware of the DORS program until they enter college and then they are placed on the DORS wait list.
- Although 91 percent of those surveyed, indicated that they do refer consumers for DORS services, 34 percent do not partner with DORS staff.
- 79 percent of the LDSS professional staff surveyed indicated they are unaware of others in their system that may refer students to DORS.
- It appears there is a disconnect between the colleges' career centers, LDSS and DORS to ensure students receive career counseling and job placement assistance.

Recommendations

- Consider establishing a liaison relationship with each LDSS office to strengthen the partnership between DORS field staff and LDSS staff in both two- and four-year colleges, as not all college LDSS professionals are familiar with DORS services and supports. This liaison with the college should be the DORS transition counselors for that county.
- DORS college liaisons should also connect with the college career center. A relationship should be established to provide career counseling and job placement assistance.

- Consider strengthening the Pre-ETS outreach to transitioning students with disabilities to ensure supports are in place prior to these consumers attending college.
- Training should be provided to college personnel regarding DORS services and supports. This training should also identify which college staff refers consumers to DORS.
- Upon consumers entering college, DORS staff should ensure updated, valid disability documentation which supports requested reasonable accommodations.

4. Assessment of the Needs of Students, and Parents of Students, Eligible for Pre-Employment Transition Services & the Extent of Which Information Regarding Getting a Job, the Job Market, Job Shadowing and Related Activities, College or Training Opportunities, and Skills Learned and Skills Still Needed Have Been Provided to these Students and Parents

Methodology: Survey of Students and Parents

Surveys were sent via email to students, and parents of students, eligible for Pre-ETS. The goal was to determine whether students and parents feel that they are receiving information regarding: getting a job, the job market, participation in job shadowing or related activities, college or training, skills learned, and skills needed in order to obtain a job post high school.

Needs/Concerns Identified

- There appear to be limited methods available for transitioning youth and students with disabilities to learn self-advocacy skills and the opportunity to practice such skills.
- There appear to be limited programs available to provide transitioning youth and students with disabilities with information about college and other training options.
- There appear to be limited opportunities for transitioning youth and students with disabilities to gain the skills needed to obtain employment or complete a skills training or college program.
- There is a lack of information received regarding the various jobs of interest for a student in their community.
- There is a need for opportunities for “real life” work experiences.
- There is a need to educate parents about summer youth programs, and paid and volunteer work experiences.

Recommendations

- DORS should consider partnering with transition coordinators to facilitate workshops for transitioning youth and students with disabilities to educate them regarding college or training options. Assistance with enrollment could also be provided.
- During summer Pre-ETS programs within the Agency, a program to assist transitioning youth and students with disabilities with learning life skills such as self-advocacy and communication should be offered.
- Additional Pre-ETS programs through the Agency could be provided to assist transitioning youth and students with disabilities with obtaining skills to acquire or complete job training.

- To address the parent concerns regarding the lack of information about the various jobs of interest for a student in their community, local DORS offices should host a job fair with employers who can provide students with information regarding various jobs.
- Increase the number of work experience opportunities for transitioning youth and students with disabilities.
- The Agency needs to increase its efforts to ensure that the parents are provided with sufficient information regarding summer youth experiences, and paid and volunteer work experiences.

(2) Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

(2) Assessment of the Need to Establish, Develop or Improve Community Rehabilitation Programs within the State

The success of DORS' consumers is due in many instances and respect to the partnerships DORS has established with CRPs, which provide a number of direct services throughout the state, and WTC, which provides a number of direct services to consumers referred by DORS counselors. Efforts are made throughout the year to ensure that there is a sufficient number of CRPs to provide employment services to consumers statewide.

To assess the need to establish, develop, or improve CRPs within the state and services available at WTC, DORS reviewed the results from:

1. A survey of CRP Executive Directors and CRP front line staff
2. A survey of DORS staff
3. Results from in-person interviews and focus groups of DORS staff

Prevalence

With regard to the CRPs working with DORS within a particular Region, data was compared from the 2016 Needs Assessment with the current 2019 data.

Region	Number of CRPs 2016	Number of CRPs 2019	Difference +/-
1 – Western Maryland	41	36	-5
2 – Southern Maryland & Lower Shore	46	49	+3
3 – Baltimore City	32	38	+6
5 – Central Maryland & Upper Shore	44	52	+8
6 – DC Metro	43	54	+11
Total	**206**	**229**	**+23**

While the allocation of CRPs by Region would appear to be robust, according to the data above, there still remains a number of CRPs that have become relatively inactive and/or provide little to no services in collaboration with DORS (Region 1: four providers; Region 2: seven providers; Region 3: eight providers; Region 5: five providers; and Region 6: 11 providers). Overall, it

appears that there has been a substantial increase in providers per Region the past three years. This is believed to be in part due to the increase in number of CRPs who are becoming DORS providers from BHA that also provide substance use treatment in addition to supported employment.

Methodology: In-person interviews of DORS Staff

Several small teams led by WTC Staff Specialist for Program Evaluation and Development, Marketing, and Outreach visited offices in four Regions to elicit feedback regarding the services available at WTC. During these visits, in-person written surveys were completed by VR counselors in conjunction with group discussion.

Needs/Concerns Identified

- There is a need to continue to simplify the process by which referrals for services are processed and admitted to WTC.
- There is a need to continue to collaborate with DORS field staff regarding communication when consumers are discharged or receive disciplinary action.
- Transportation costs negatively affect the decision to refer an individual to attend services at WTC.

Recommendations

- Continue to simplify the process for referring individuals to WTC.
- Examine strategies for enhanced communication between WTC and DORS field staff.
- Explore how WTC can assist with the transportation needs of consumers interested in participating in services.

Methodology: **DORS Staff Surveys**

A survey was sent to DORS field staff regarding WTC and CRPs. Fifty-one staff responded to the survey.

90 percent of DORS staff reported that they view WTC as an effective partner in their consumer's rehabilitation. DORS field staff reported that the most frequently utilized WTC services include career assessment, work readiness, rehabilitation technology services, driver's education, career training, and medical services. When asked what concerns consumers expressed to DORS field staff regarding the WTC and what reservations staff have about referring individuals to WTC, the overwhelming response was distance and transportation.

Regarding CRPs, DORS field staff identified a need for improved communication between CRPs and DORS field staff, more training for CRP staff regarding DORS policy and documentation (84 percent reported issues with timely submission of reports and invoices, 51 percent reported issues with timely submission of employment verification forms, and 46 percent reported issues with the accuracy of reports), a lack of CRPs specializing in Traumatic Brain Injury or Intellectual Disabilities, and a need for additional supports for consumers with Autism who are college bound.

A survey was sent to CRP executive directors and front line staff to elicit feedback on the relationship between DORS' staff and the CRP community, a possible rate increase for services, and other needs. Forty-nine responses were received.

Information from CRPs indicated:

- A continued need for increased communication between DORS' staff and CRPs regarding a lack of notice when DORS has policy changes.
- An interest in additional training to work with specific disability populations.
- Training in DORS policy, procedures and documentation.
- Need for benefits counseling for consumers when initiating a referral prior to entering the job search process.
- Need for increased rates.

When DORS policy changes, CRP staff prefer communication to come directly from Headquarters using a distribution list. The second preference is to receive the information from the counselor liaison. The least preferred methods were: the DORS' website, and in-person communication from the DORS supervisor.

CRP staff were asked for information regarding how they thought DORS should increase their rates and what would be an appropriate percentage:

- 39 percent indicated a preference to use the projected increase for minimum wage.
- 34 percent indicated a preference to use the cost of living increase.
- 14 percent indicated that a flat rate increase would be preferable.

A survey was posted on the DORS website for individuals to complete regarding CRPs and WTC. Forty-two individuals responded to the survey.

Of those individuals completing the survey, 45 percent were aware of WTC. All of these individuals reported that they learned about WTC through personal contacts, DORS staff, transition fairs, family and friends. None had learned of WTC through other means such as social media and direct marketing. Of those familiar with WTC, 58 percent were not aware that a dormitory is available for consumers. Respondents also indicated an interest in apprenticeships, increasing the number of training programs, and expanding job search assistance.

(3) Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act.

(3) Assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services

Needs/Concerns Identified

- CRPs need training to better understand DORS policy, documentation, and invoicing requirements.
- Lack of timeliness and accuracy of documentation received from CRPs.
- Improve communication between DORS field staff and CRPs.
- Improve communication from DORS to CRPs when policy changes are implemented.
- Enhance communication and education between DORS field staff and CRPs regarding when and under what circumstances an individual can receive benefits counseling.
- CRP rates need to be increased.
- Transportation is a barrier for individuals to participate in services at WTC.

Recommendations

- Strive to improve effective communication between DORS field staff and CRPs.
- Improve communication from DORS to CRPs when policy changes are implemented.
- Develop training modules for CRPs to include understanding DORS Policy (when changes are made), reporting and documentation requirements, and invoicing.
- Enhanced communication regarding when and under what circumstances an individual can receive benefits.
- Explore a CRP rate increase for the provision of services.
- Develop training opportunities for DORS staff to have a better awareness of CRP services provided and greater knowledge of consumer status from referral to completion or services.
- Develop new training programs at WTC and CRPs based on market demands of growing fields. Training programs will include the exploration of additional apprenticeship programs, travel training, and travel assistance.
- WTC will work with the DORS Office of Public Affairs to increase direct marketing to consumers and explore social media and other methods of outreach to make the program and its activities more widely recognized by potential participants.
- WTC will explore transportation assistance to include travel training when needed and other accommodations to make travel more affordable.
- WTC will pursue an apprenticeship coordinator position within the Employment Services department to allow for greater exploration and participation of consumers in apprenticeship and pre-apprenticeship programs.
- WTC will work with the DORS Office of Public Affairs to develop marketing materials to inform individuals when they can receive benefits.

(k) Annual Estimates.

Describe:

(1) The number of individuals in the State who are eligible for services.

DORS estimates that 20,000 individuals are eligible for services under Title I of the Rehabilitation Act.

(2) The number of eligible individuals who will receive services under:

(A) The VR Program;

Based on historical data, economic trends, and other factors, the estimated number of individuals who will receive services under the VR program is 17,775, not including approximately 5,700 students with disabilities receiving pre-employment transition services. The chart in Section C provides details.

(B) The Supported Employment Program; and

Based on historical data, employment trends, and other factors, the estimated number of individuals who will receive services under the Supported Employment Program is 275. The chart in next section provides details.

(C) each priority category, if under an order of selection.

The following breakdown provides data on the number of individuals receiving services under an Individualized Plan for Employment:

- Title I – 17,775;
- Title VI - 275;
- Category 1, Most Significant: 14,000
- Category 2, Significant: 3,775; and
- Category 3, Non-Severe: 0.

Category	Title I or Title VI	Estimated Funds	Estimated Number to be Served	Average Cost of Services
Most Significant	Title I	$32,094,272	14,000	$2292
Most Significant	Title VI	$310,091	275	$1,745
Significant	Title I	$8,023,568	3,775	$2,125

Pre-employment Transition Services:

- Title I funds reserved: $7,079,619
- Estimated number to be served: 5,700
- Average cost for services: $1,242

(3) The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

The number of individuals determined eligible for VR services, but not receiving services due to an order of selection is 3,000. Individuals on the wait list are those determined to be Category 2, Significant Disability.

(4) The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

The table below provides information on the number of individuals to be served under the VR Program and the Supported Employment Program, by priority category, and the cost of services.

Category	Title I or Title VI	Estimated Funds	Estimated Number to be Served	Average Cost of Services
Most Significant	Title I	$32,094,272	14,000	$2292
Most Significant	Title VI	$310,091	275	$1,745
Significant	Title I	$8,023,568	3,775	$2,125

Pre-employment Transition Services:

- Title I funds reserved: $7,079,619
- Estimated number to be served: 5,700
- Average cost for services: $1,242

(l) State Goals and Priorities.

The designated State unit must:

(1) Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

The goals and priorities provided below were jointly developed and agreed to by DORS and the Maryland State Rehabilitation Council. These two entities have also agreed to the revisions of the same.

(2) Identify the goals and priorities in carrying out the VR and Supported Employment programs.

Goal 1: Assure high-quality integrated employment outcomes for individuals with significant and most significant disabilities in Maryland through the VR program.

Objective 1.1 - Provide quality customer service consistent with the Governor's Customer Service Promise.

Strategies: DORS will

1. Ensure staff follow the principles of the Governor's Customer Service Promise.
2. Continue to evaluate customer satisfaction during service delivery in partnership with the State Rehabilitation Council.
3. Enhance communication between DORS staff and consumers.
4. Continue to implement a Quality Assurance Review Program for VR to ensure consistency with required measures under WIOA.

Performance Measures by September 30, 2020:

1. Continue to review feedback on the Governor's Customer Service Promise and respond as needed, and participate in MSDE's customer service training.
2. Conduct Customer Satisfaction Survey on a quarterly basis for consumers to provide feedback on their satisfaction with services at key points during the rehabilitation process.
3. Increase customer satisfaction with communication from DORS staff will be noted in DORS customer satisfaction surveys.
4. Achieve 85 percent customer satisfaction for OFS and for OBVS.
5. Complete one Quality Assurance Case Review for each District during the FY and improve statewide Quality Assurance measures in comparison to the previous year.

Objective 1.2 - Provide rehabilitation services for youth with disabilities in collaboration with Local School Systems (LSS) and workforce partners that lead to successful outcomes in post-secondary education and/or employment.

Strategies: DORS will

1. Ensure that VR counselors and staff work with youth with disabilities, families, school personnel, business partners, and community partners to help these students prepare for and achieve employment and self-sufficiency.
2. Support and emphasize the application for VR services.
3. Formalize consistent partnerships with Local School Systems (LSS) through agreements to ensure access to Transition services throughout the state.
4. Emphasize and implement transition services to promote educational achievement, independence and long term career success.
5. Provide training and support to DORS counselors and partners through the Transition Specialists Group, training programs, and other meetings. Training will provide tools and resources related to post-secondary education, and best practices in working with families and transitioning students.
6. DORS will promote participation in transition events including 504 and IEP planning meetings.

Performance Measures by September 30, 2020:

1. The number of youth with disabilities served will match or exceed those served in the previous year.
2. Update existing Memoranda of Understanding with 24 Local School Systems (LSS), MD School for the Deaf, and MD School for the Blind.
3. Documented services through authorizations and Actual Services records, provided to transition youth will increase in comparison to the previous year.
4. There will be an increase in transitioning youth with disabilities who achieve competitive integrated employment and/or enroll in post-secondary education programs, compared with the previous year.

5. The DORS Transition Specialists Group will meet semiannually and include staff training on pertinent topics related to best practiced in working with families and transitioning students.

Objective 1.3 - DORS will provide high quality services and outcomes for individuals with disabilities served by the Office of Field Services (OFS).

Strategies: DORS will

1. Provide high quality comprehensive services to eligible individuals with significant disabilities in accordance with the WIOA and Federal Regulations, the Code of Maryland Regulations, and DORS Policy.
2. Collaborate with WTC to assure consumers receive services offered at WTC in a seamless and timely manner.
3. Strengthen relationships with WIOA partners to improve competitive integrated employment outcomes for DORS consumers and improve reporting on common performance measures for DORS consumers.
4. Continue to train staff to accurately enter Educational Goals and verify Measurable Skills Gains.
5. Improve reporting of services provided through the documentation of Actual Service Records (ASR).
6. Utilize data analytics to identify areas of concern and ensure accurate reporting.

Performance Measures by September 30, 2020:

1. Meet federal performance standards for timely determination of eligibility and development of the Individualized Plan for Employment.
2. Enhance consumer employment outcomes as measured by an increase in average hourly earnings from the previous year.
3. Provide staff training related to the new federal and state common measures for WIOA Core Programs.
4. OFS will achieve 1,303 Competitive Integrated Employment Outcomes.
5. Increase number of Actual Service Records entered over previous FY.
6. Establish baseline for number of verified Measurable Skills Gains.

Objective 1.4 - DORS will provide high-quality services and outcomes for individuals who are blind, vision impaired and Deaf-Blind (B/VI, D-B).

Strategies: DORS will

1. Provide high quality comprehensive services to eligible individuals who are blind, vision impaired and Deaf-Blind in accordance with the WIOA and Federal Regulations, the Code of Maryland Regulations, the Randolph Shepard Act and DORS Policy.
2. Provide independent living services to older individuals who are blind through direct services of DORS rehabilitation teachers.

3. Collaborate with WTC to enhance services and educate staff to assure that blind, vision impaired and Deaf-Blind consumers have effective programming at WTC.
4. Strengthen relationships with WIOA partners to improve competitive integrated employment outcomes for DORS consumers and reporting on common performance measure for DORS consumers.
5. Continue to expand services and outreach to individuals who are deaf-blind and provide technical assistance to staff serving this population as recommended by the Deaf-Blind Workgroup.
6. Recruit and train Maryland Business Enterprise Program for the Blind vendors, and grow the program strategically.
7. Develop a standardized curriculum of activities for OBVS staff to ensure highly qualified staff to provide excellent service and increase customer satisfaction.
8. Continue to train staff to accurately enter Educational Goals and verify Measurable Skills Gains.
9. Improve reporting of services provided through the documentation of Actual Service Records (ASR).
10. Utilize data analytics to identify areas of concern and ensure accurate reporting.

Performance Measures by September 30, 2020:

1. Meet federal performance standards for timely determination of eligibility and development of the Individualized Plan for Employment.
2. OBVS will achieve 80 competitive integrated employment outcomes.
3. The Business Enterprise Program will recruit/train/license five new managers and establish new vending sites where available.
4. OBVS will close 190 ILOB cases successful.
5. The Deaf-Blind Specialist will provide and/or coordinate three trainings per year for DORS staff to enhance awareness and knowledge regarding deaf-blindness.
6. The Deaf-Blind Workgroup will meet three times per year to identify and expand services for the Deaf-Blind.
7. Increase staff competencies and proficiencies to serve OBVS population.
8. Enhance consumer employment outcomes as measure by an increase in average hourly earnings from the previous year.
9. Provide staff training related to the new federal and common measures for WIOA Core Programs.
10. Increase number of Actual Service Records entered over previous FY.
11. Establish baseline for number of verified Measurable Skills Gains.

Objective 1.5 - Provide effective services at the Workforce & Technology Center using state-of-the-art interdisciplinary strategies.

Strategies: DORS will

1. Continue to provide high quality comprehensive services to individuals with significant disabilities to facilitate successful competitive integrated employment outcomes.

2. Continue to develop and enhance relationships with employers utilizing agency staff who specialize in underserved populations to address service needs; as well as, issues and trends related to the employment of underserved disability populations.
3. Enhance employer engagement through linkages with employers, the business community, DORS Business Services staff, the Maryland Apprenticeship Think Tank, and community partners.
4. Continue to provide comprehensive services and awareness to employers to enhance knowledge and understanding of the benefit of assistive technology at the worksite.
5. Continue to implement and monitor WTC staff documenting measurable skills gains/credentials for individuals served.
6. Collaborate with WIOA partners for the sharing of training resources for individuals served.

Performance Measures by September 30, 2020:

1. Increase the number of consumers achieving competitive integrated employment outcomes compared to the previous year.
2. Increase the number of consumers who are blind/vision impaired and Deaf-Blind who will receive services compared to the previous year.
3. Increase the number of consumers who are deaf or hard-of-hearing who will receive services compared to the previous year.
4. Increase the number of consumers who have Autism who will receive services compared to the previous year.
5. Increase the number of customized and/or partnership trainings compared to the previous year.
6. Increase the number of consumers receiving apprenticeship services for consult and/or support compared to the previous year.
7. Participate in the division-wide Business Services Team and Maryland Apprenticeship Think Tank for the expansion of employer engagement including customized trainings, partnership programs, and pre-apprenticeship and apprenticeship programs.
8. Increase the number of worksite consumers served as compared to the previous year.
9. Increase the number of documented measurable skills gains/credentials for individuals served at WTC as compared to the previous year.
10. Establish a working relationship with the newly hired MD Labor Training Coordinator for the sharing of training resources with WIOA partners.

Goal 2: Assure high quality Pre-ETS service for qualified students with disabilities.

Objective 2.1 - DORS will utilize resources to coordinate and ensure the provision of pre-employment transition services as required.

Strategies: DORS will

1. Ensure that VR counselors and staff work with students with disabilities, families, school personnel, business partners, and community partners to help these students prepare for and achieve employment and self-sufficiency.

2. Support and emphasize the application for VR services for potentially eligible students.
3. Formalize consistent partnerships with Local School Systems (LSS) through agreements to ensure access to required/CORE Pre-ETS and Transition services throughout the state.
4. Emphasize and implement Pre-ETS and transition services to promote educational achievement, independence and long term career success.

Performance Measures by September 30, 2020:

1. Increase in the number of students receiving pre-employment transition services compared with the previous year.
2. The number of potentially eligible students receiving Pre-Employment Transition Services whom apply for VR services will match or exceed those who have applied for services in the previous year.
3. Update existing Memoranda of Understanding with 24 Local School Systems (LSS), MD School for the Deaf, and MD School for the Blind.
4. Implement strategies for the development and expansion of additional WTC consumer services for pre-employment transition services and services for transitioning youth.
5. Designated WTC staff will attend the statewide quarterly Pre-ETS / Transitioning Youth meeting facilitated by the agency's Staff Specialist for Transition Services to enhance and/or develop new WTC programs.

Goal 3: This goal focuses on a non-VR program that is outside of WIOA and not applicable to the WIOA State Plan (Disability Determination Services).

Goal 4: Partner and collaborate with other WIOA programs, private organizations, employers, and community groups to advance the employment and independence of individuals with disabilities.

Objective 4.1 - Evaluate and monitor service delivery for consistency with WIOA priorities.

Strategies: DORS will

1. DORS/WTC staff and WIOA partners will participate in joint trainings to learn about the benefits of services available at the state and local level.
2. Contribute to the tracking of the Benchmarks of Success for Maryland's Workforce System.
3. Participate in local planning meetings regarding service provision and collaboration in AJCs to strengthen referral procedures and tracking of consumer involvement with WIOA partners.
4. Promote the Employment First approach for individuals transitioning from subminimum wage positions.
5. Progress will be made on the implementation of the recommendations of the Comprehensive Statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland.
6. DORS will reconvene the CRP Advisory Council.

Performance Measures by September 30, 2020:

1. DORS will participate in training activities with WIOA partners, and develop an agency clearinghouse of training materials, including a joint calendar of events.
2. DORS data specific to the Benchmarks for Success will be shared with WIOA partners and DORS staff.
3. Establish a baseline number of consumers involved in services provided by WIOA partners using AWARE documentation, including individuals on the waitlist. Develop a means to track WIOA partner collaboration in AWARE.
4. Continue to provide group career counseling and information sessions to individuals employed in subminimum wage positions, to be concluded by October 2020.
5. Implement findings of the 2020 Comprehensive Statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland.
6. CRP advisory council will meet three times per year.

Objective 4.2 - Enhance collaboration with and services to Maryland private and public employers.

Strategies: DORS will

1. Regional Business Services Representatives and WTC Employment Specialists will provide, enhance, and track services to businesses including recruitment assistance, technical assistance for tax incentives, development of work-based learning opportunities, OJT and customized training, apprenticeships, retention services, and disability awareness and ADA training.
2. Engage with businesses through the CSAVR National Employment Team (NET).
3. Collaborate with WIOA partners and community rehabilitation programs to leverage business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities.
4. Partner with businesses to connect them to DORS job seekers through tours, career information sessions, job fairs, and other direct means.

Performance Measures by September 30, 2020:

- The number of services to employers will increase as compared to the previous year and will be documented in the AWARE employer module to measure effectiveness in serving employers.
- The number of work-based learning opportunities, including, but not limited to, QUEST and OJT opportunities will increase as compared to the previous year and be tracked through the AWARE case management system.
- Communications, minutes and agendas of CSAVR NET meetings and activities as well as business services reports will confirm activities and progress.
- Monthly narrative reports from Business Service Representatives will show evidence of activities with agency partners.

- Business partner activities will be tracked in the AWARE Employer module and increase over previous year.

Objective 4.3 - DORS will provide support to the State Rehabilitation Council (SRC) to maintain and enhance its leadership role in the oversight of VR service delivery in Maryland.

Strategies: DORS will

- DORS will ensure that it works with the State Rehabilitation Council (SRC) in accordance with federal law and regulations and Council By-Laws.
- Council members will review and comment on the Annual Agency Program Plan, DORS progress in meeting its performance goals, and DORS program accomplishments

Performance Measures by September 30, 2020:

- The Maryland SRC will conduct four quarterly meetings.
- The Maryland SRC and DORS will conduct annual public meetings.

Objective 4.4 - Promote and enhance quality independent living outcomes for individuals with disabilities in Maryland through independent living programs.

Strategies: DORS will

- Provide grant support, technical assistance and monitoring to the Statewide Independent Living Council (SILC).
- Manage DORS grants to Centers for Independent Living (CILs), including providing technical assistance and monitoring regarding the IL program, the IL AT program, and fiscal responsibilities.
- Participate as an IL Partner in implementation of the 2017-2020 State Plan for Independent Living.
- Regional Directors and OBVS Supervisors will conduct an annual meeting with Executive Directors of CILs within their areas to discuss issues of mutual interest.

Performance Measures by September 30, 2020:

- Annual reviews of grant performance will be conducted for each CIL with which DORS has a grant, and the Statewide Independent Living Council.
- DORS Regional/Program directors will confirm at least annual meetings with CIL Executive Directors.

Objective 4.5 - Evaluate partner connection for consumers receiving Social Security Benefits.

Strategies: DORS will

- Review current policy to ensure order of selection assignments for individuals with Social Security benefits are accurate.
- Complete referrals for Social Security recipients on the waitlist to employment networks and the Work Incentives and Planning Assistance (WIPA).
- Provide information regarding referral to an employment network upon DORS case closure to participants who receive Social Security benefits. DORS will obtain consent to disclose information to Employment Networks.
- Ensure fee for service benefits planning is completed for all appropriate Social Security recipients.

Performance Measures by September 30, 2020:

- DORS counselors and supervisors will utilize Social Security and medical documentation when making eligibility and order of selection determinations.
- DORS will track participants with Social Security benefits in delayed status to increase referral to employment networks and/or WIPA as appropriate.
- DORS will track participants with Social Security benefits to increase referral to an Employment Network after obtaining employment.
- The number of Social Security beneficiaries receiving timely fee-for-service benefits counseling will increase as compared to the previous year.

Goal 5: Provide infrastructure to promote and support the accomplishment of the DORS mission

Objective 5.1 - Implement strategies required by WIOA and in accordance with the Combined State Plan.

Strategies: DORS will

- Continue to implement Memoranda of Understanding /Resource Sharing Agreements with workforce partners required to fulfill new federal reporting requirements.
- Expand electronic communication with DORS consumers throughout the case process, including post-exit.
- Explore data collection systems with WIOA partners to facilitate the collection of federal reporting requirements.
- Provide DORS staff and agency partners with opportunities to receive internal technical assistance and training regarding WIOA implementation.
- Expand the use of Actual Service Records (ASR) to document consumer involvement with WIOA partner agencies.

Performance Measures by September 30, 2020:

- MOUs and Resource Sharing Agreements will be completed on an as needed basis to conform to State and Federal regulations.
- Electronic communication procedures for requesting and collecting information and input from DORS consumers will be implemented and updated in the RSM.

- Recommendations for data collection systems will be reviewed as available.
- Staff will be provided technical assistance on a topic related to WIOA at least quarterly.
- The use of Actual Service Records (ASR) case documentation will increase as compared to the previous year.

Objective 5.2 - Increase staff competency and satisfaction by providing ongoing staff training, professional development, and leadership development programs while intentionally promoting a culture of staff retention.

Strategies: DORS will

- Establish an Internal Communications Workgroup to recommend a methodology which will ensure all staff receive clear and consistent communication.
- Will continue working towards developing position-specific trainings to be offered via a learning management system platform for both existing and new staff to access the learning modules utilizing input from the New Staff Training Workgroup.
- Develop a comprehensive training series for Supervisors to include personnel management and case management functions.
- Encourage DORS staff to access on-line/web-based learning management systems to address ongoing training needs.
- Provide leadership development and cross-training opportunities to ensure continuation of critical agency functions.
- Continue to support DORS staff obtaining advanced degrees in VR and related fields.
- Conduct at least quarterly trainings of Business Services staff to enhance their skills and develop strategies for engaging businesses.
- Develop and utilize a DORS Employee Satisfaction Survey.

Performance Measures by September 30, 2020:

- Internal Communication Workgroup recommendations will be provided to executive staff.
- New Staff Training Workgroup recommendations will be provided to executive staff in order to move forward with publishing training modules.
- Management trainings for new DORS supervisors will be offered twice during the FY. Examples of these trainings will include staff evaluation using specific reports and exit interviews.
- Staff use of accessible on-line/web based learning management systems such as WINTAC, NASWAL and ADA learning centers will increase during the FY.
- At least one multi-session leadership development program with a cross-training component will be offered during the FY.
- Staff enrollment in graduate school programs will increase from the previous FY.
- Agendas and minutes of Business Services meetings will document training progress.
- DORS Employee Satisfaction will be surveyed and the information gathered will be used to address turnover and internal changes to help motivate staff.

Objective 5.3 - Promote strategic use of accessible technology and establish policy and internal controls to support staff effectiveness and efficiency.

Strategies: DORS will

- Implement the recommendations from the Technology Tips Workgroup identified as Year One Key Actions in the DORS Strategic Plan for 2020-2021.
- Ensure staff resources are aligned to the agency priorities to serve customers and claimants effectively.
- Review, update, and document internal controls and streamline case management, communication, and administrative procedures to reduce errors and establish consistency statewide.
- Convene a workgroup of program managers and staff specialists to develop a consistent vendor application and approval process and monitoring protocol.

Performance Measures by September 30, 2020:

- DORS Strategic Plan Information Technology Key Actions for Year One will be implemented.
- DORS intranet will be updated.
- E-Fax will be used for inbound and outbound communication.
- DORS will have identified technology for collecting e-signatures.
- Expand use of GovDelivery to send appointment reminders to customers and solicit post-exit follow-up.
- Position descriptions will be reviewed and revised, as necessary, for consistency with Agency priorities to ensure appropriate distribution of Agency resources.
- DORS required forms and administrative procedures will be reviewed and streamlined.
- Establish internal control procedures for the vendor application and approval process and monitoring vendor performance.
- All staff will receive training on the correct use of Actual Service Record (ASR) entries.

(3) Ensure that the goals and priorities are based on an analysis of the following areas:
(A) the most recent comprehensive statewide assessment, including any updates;
(B) the State's performance under the performance accountability measures of section 116 of WIOA; and
(C) other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

The state goals and priorities are based on the analysis of the 2016 comprehensive needs assessment and updates, the state's performance under performance accountability measures, input from the Maryland State Rehabilitation Council, and recommendations from monitoring activities.

(m) Order of Selection.

Describe:

(1) Whether the designated State unit will implement and order of selection. If so, describe:
(A) The order to be followed in selecting eligible individuals to be provided VR services.

Individuals shall be placed in priority categories at the time of eligibility determination. Depending upon DORS' resources, the categories shall be closed for services in ascending order beginning with Category III and proceeding to Categories II and I. Services shall be provided only to those individuals in an open category. However, DORS shall continue to plan for and provide services to any individual determined eligible prior to the date on which the Order of Selection category to which the individual has been assigned has been closed, irrespective of the severity of the individual's disability.

DORS staff will be advised via formal issuance when categories are closed or reopened. Consumers shall be taken off the waiting list when resources are available to provide services, based on their application date.

The Order of Selection categories are as follows:

I. Individuals with Most Significant Disabilities.
II. Individuals with Significant Disabilities.
III. Individuals with Non-Severe Disabilities.

Under the order of selection, DORS will continue to emphasize and enhance services to students with disabilities transitioning from school to work.

Description of Priority Categories

An individual with a most significant disability is an eligible individual:

- Who has a severe physical or mental impairment which seriously limits three or more functional capacities such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills, in terms of an employment outcome;
- Whose VR can be expected to require multiple VR services: at least two from the main services of guidance and counseling, medical rehabilitation services including technology services, job placement, and vocational training; and
- Whose VR is projected to require an extended period of time of at least six months?

It is emphasized that determination of priority category is based on the disability and its impact on employment. There must be clear evidence, demonstration or documentation of the limitations imposed by the disability.

An individual with a significant disability is an eligible individual whose severe physical or mental impairment seriously limits one or two functional capacities and also meets requirements in b and c above.

An individual with a non-severe disability is an eligible individual who does not meet the definition of significant or most significant disability.

(B) The justification for the order

An order of selection is required under section 101 (a)(5) of the Rehabilitation Act if a rehabilitation agency determines that it is unable to provide services to all eligible individuals who apply for services. With an order of selection, services must first be provided to individuals with the most significant disabilities before they are provided to other eligible individuals.

Due to limited personnel and financial resources, DORS has been unable to provide services to all eligible individuals. Based on projected fiscal and personnel resources, an order of selection will remain in effect. The Division's order of selection ensures that eligible individuals with the most significant disabilities receive priority.

Update: Building upon previous initiatives, DORS has surveyed over 1,300 individuals who were assigned to the waiting list between December 2015 and June 2017 to determine those who wish to remain on the waiting list for VR services. Responses to this survey has resulted in a reduction of approximately 600 individuals from the waitlist. Additionally, since January 2018, 445 individuals have been moved off the waitlist.

DORS will continue to investigate methods to increase engagement of DORS consumers, including youth, while they are on the waitlist, such as by more proactively providing information and referral services to WIOA partner agencies, including timely follow-up on those referrals.

(C) The service and outcome goals.
(D) The time within which these goals may be achieved for individuals in each priority category within the order; and

The Division's case management system is designed to assure that individuals with the most significant disabilities are selected for services before all others. The estimated ratio of individuals exiting with and without employment outcomes has decreased from previous years. Note: This decrease is primarily due to the increased emphasis on competitive integrated employment in WIOA and the Division's transition to WIOA common performance metrics.

For the first priority category, 14,000 will be served. It is estimated that 1,150 individuals will exit with employment after receiving services. It is estimated that 3,500 individuals will exit without employment after receiving services. The goals are to be achieved within 29 months. The cost of these services is $32,094,272.

For the second priority category, 3,775 will be served. It is estimated that 100 individuals will exit with employment after receiving services. It is estimated that 750 individuals will exit without employment after receiving services. The goals are to be achieved within 29 months. The cost of services is $8,023,568.

For the third priority category, zero will be served. It is estimated that zero individuals will exit with employment after receiving services. It is estimated that zero individuals will exit without

employment after receiving services. The goals are to be achieved within zero months. The cost of services is $0.

(E) How individuals with the most significant disabilities are selected for services before all other individuals with disabilities.

Under an order of selection, DORS selects individuals with the most significant disabilities first for the provision of VR services. (Section 101(a)(5)(C) of the Act and 34 CFR 361.36(a)(3)(iv)(A). Individuals who are eligible for VR services and who cannot presently be served under the order of selection are advised that their record will be placed on a waiting list. Eligible individuals are removed from the waitlist based on their application date, once resources are available to serve them.

(2) If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

DORS has elected not to serve eligible individuals who require specific services or equipment to maintain employment, regardless of the established order of selection.

(n) Goals and Plans for Distribution of title VI Funds.

(1) Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

Goals and Priorities for the Provision of Supported Employment Services

Supported employment services are provided on a statewide basis through the Title VI, Part B, and also Title I funds. Supported employment is competitive employment or employment in integrated work settings in which individuals are working toward competitive employment, with ongoing support services for individuals with the most significant disabilities for whom competitive employment has not traditionally occurred, or for whom competitive employment has been interrupted or intermittent as a result of a significant disability. Fund allocation on a statewide basis ensures an equitable statewide service delivery.

(2) Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:
(A) the provision of extended services for a period not to exceed four years; and

DORS will continue to encumber Title VI, Part B funds on a fee-for-service basis. When supported employment services exhaust Title VI, Part B funds, DORS counselors shall be instructed to encumber Title I funds. In that way, individuals in need of supported employment services will continue to be served, even when Title VI, Part B funds are exhausted. DORS counselors will expend Title VI, Part B funds after receipt of documentation confirming the provision of extended services. In compliance with the Rehabilitation Act, as amended, DORS will expend Title I dollars until an extended source of funding has been obtained. The goal of the state’s supported employment program is to maintain a system whereby individuals with the most significant

disabilities are afforded the opportunity to participate in integrated competitive employment. It is estimated that 5000 individuals with the most significant disabilities will be served in FY20 in supported employment.

(B) how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

It is estimated that 1,000 transitioning students age 24 and under will be served in supported employment. In accordance with WIOA requirements, DORS will be setting aside 50 percent of its Supported Employment allotment as well as a ten percent match to provide services to youth with disabilities. There has been a steady growth in the numbers of individuals with serious and persistent mental illness being served in supported employment.

DORS and the Developmental Disabilities Administration (DDA) collaborate to provide a seamless transition for youth with intellectual disabilities to consider competitive integrated employment as their first option. As collaborative partners in serving youth with the most significant disabilities, DORS has assigned counselor liaisons to each DDA provider. DORS is updating the cooperative agreement to reflect the roles and responsibilities of both partners at the state and local level, consistent with changes resulting from the WIOA of 2014.

DORS and the Maryland Behavioral Health Administration collaborate in the provision of supported employment services to youth and adults with persistent mental illness at a number of community programs throughout the state. Further, DORS and the Maryland Behavioral Health Administration have been working to streamline the VR application process by identifying required data elements that may be collected prior to referral to increase efficiency.

DORS supports the use of supported employment models that maximize integration of youth and adults with the most significant disabilities in competitive integrated employment.

DORS and the Maryland Behavioral Health Administration are currently updating the Memorandum of Understanding that identifies the roles and responsibilities of both partners at the state and local level. This agreement will further strengthen the collaborative relationship between both agencies and for the first time define the process for serving youth with serious and persistent mental illness.

The estimated number of individuals with significant disabilities who will achieve a supported employment outcome during FY20 is 550 individuals.

(o) State's Strategies.

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):
(1) The methods to be used to expand and improve services to individuals with disabilities.

Expanding and Improving Services to Individuals with Disabilities

- DORS will continue to analyze office locations, staff deployment, staff positions, and responsibilities, in accordance with DORS mission to more effectively serve students and adults with disabilities, in collaboration with the WIOA partners;
- The 2019 Comprehensive Statewide Needs Assessment included an assessment and recommendations for expanding and improving services to students and adults with disabilities;
- In collaboration with the WIOA partners, DORS will establish linkages with businesses and employers to include training, customized employment, education and disability awareness, on-site worksite Assistive Technology services, and mentoring/internship activities;
- DORS will continue to enhance relationships with Community Rehabilitation Programs to ensure availability of Community Rehabilitation Program services statewide;
- DORS will continue to expand services and outreach to individuals who are deaf-blind and provide technical assistance to staff and WIOA partners serving this population; and
- In collaboration with WIOA partners, DORS will develop relationships with employers and analyze labor trends, to increase opportunities for employment of populations that are unserved or underserved.

(2) How a broad range of Assistive Technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

The DORS Workforce and Technology Center's Rehabilitation Technology Services program is a national leader in providing worksite evaluation and Assistive Technology services that help people with disabilities get and maintain employment. Through the effective use of Assistive Technology, Rehabilitation Technology Services staff solve problems for people who have limitations in communication, mobility, vision, and thinking.

- Rehabilitation Technology Services provide services to DORS consumers and employers in the areas of worksite job accommodations, adaptive driving, Assistive Technology assessment and training, and residential modification consultation. Examples of Assistive Technology provided included hand controls for cars, ramps and stair glides for the home, alternative keyboards and mice or screen magnification and screen readers for computers, and specialized computer-based writing tools. Rehabilitation Technology Services include assistive technology, driver and vehicle services, residential modifications, and worksite evaluations.
- DORS policies and procedures will continue to support statewide Assistive Technology services and devices for consumers at each stage of the rehabilitation process.

(3) The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

- DORS will continue to provide staff resources and staff training to support Evidence-Based Practice Supported Employment and consumers who receive Assertive Community Treatment services;
- The DORS multi-cultural workgroup will continue to develop and publicize specialized resources for minority groups, focusing on Hispanic and Asian consumers;
- DORS will continue strategic activities to enhance the agency's capacity to meet the unique needs of students and adults with Autism spectrum disorders who are preparing for employment;
- DORS will continue meetings and trainings with Acquired Brain Industry VR Specialists, to include Transitioning Youth Specialists;
- Through the WIOA Jobseeker Advisory Focus Groups and additional means, DORS will seek input of minorities, those with the most significant disabilities, and those who have been unserved or underserved at statewide public meetings and at quarterly state Rehabilitation Council meetings.

(4) The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

DORS provides VR services and pre-employment transition services in partnership with local education agencies, workforce partners, and businesses that lead to successful outcomes in postsecondary education and employment for students with disabilities.

- DORS will ensure that VR counselors and staff work with high school students (including those in special education, with 504 plans, with severe medical conditions, and those who have a disability for purposes of section 504), families, school personnel, and community partners to help students prepare for and achieve employment and self-sufficiency;
- DORS will continue to emphasize and implement evidence-based transition practices, including work-based experiences such as Project Search, internships, and summer employment to promote long-term career success and leadership, including expanding transitioning services at the Workforce and Technology Center (especially for consumers not planning to attend college);
- DORS will implement the provision of Pre-Employment Transition Services as outlined in the WIOA, including the following services: Job Exploration Counseling, Work-based learning experiences, Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs, Workplace readiness training, and Instruction on Self-Advocacy for high school students with disabilities who are 14-21 years old; and
- The Division will continue to provide training and support to transition counselors through the Transition Specialists Group and other meetings, the Transition Conference, and training programs. Training shall help counselors identify and develop tools and resources related to postsecondary education and best practices in working with families and transitioning students. The agency will also collaborate with Developmental Disabilities Administration and clarify procedures to ensure seamless transition for individuals receiving Developmental Disabilities Administration assistance.

(5) If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

- DORS is exploring means of monitoring Community Rehabilitation Programs to assure accountability and quality of services;
- DORS is also exploring payment rates and systems of payment which incentivize outcomes and are fair to providers; and
- DORS promotes the availability of Community Rehabilitation Programs that serve unserved and underserved populations.

(6) Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

- DORS will continue to actively participate with the WIOA partners on the WIOA Workgroups. The collaboration will ensure effective and efficient implementation of new common performance accountability measures in Maryland, identification of best presentation of WIOA performance reports for the state and for Local Areas, development of recommendations for additional measures, and negotiation of levels of performance/adjustment factors;
- DORS and the other WIOA Core Programs will establish base-line or benchmarking data in the first year of data collection for the new Common Performance measures;
- In order to secure wage data for DORS consumers working in other states, DORS will explore strategies with MD Labor to access Wage Record Interchange System wage reporting system;
- DORS will review data sharing agreement with the WIOA partners as described within this plan for possible revisions to have better access to wage data; and
- Federal employment data is available through FEDES, which is operated by the University of Baltimore, Jacob France Institute under contract with MD Labor and the USDOL. DORS will work with WIOA partners to review existing agreement and take appropriate actions to ensure access to federal wage records.

(7) Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

- DORS is collaborating with its WIOA partners, including those within the AJCs throughout the state, on office spaces. As leases expire, DORS will look for opportunities to expand the co-location of DORS and other WIOA partners, in an effort to assist in better serving individuals with disabilities;
- DORS will collaborate with WIOA partners to offer cross-training on disability awareness, customized employment, Assistive Technology, and other disability-specific topics;
- DORS Business Service members will collaborate with WIOA partner Business Service teams to leverage business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities; and

- DORS will coordinate with WIOA partners, including WIOA Business Services Team and AJCs, in recruitment events and job fairs.

(8) How the agency's strategies will be used to:
(A) achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

During FY19, DORS updated its Strategic Plan, to include the following goals:

Goal 1. Organizational structure will support the success of DORS customers and accurate/timely disability decisions for claimants in a manner that reflects statutory and regulatory requirements, respect for customer and claimants, and equitable working conditions for staff.
Goal 2. Increased use of current information technology will continue to enhance administration of the program, provision of services, and achievement of employment for consumers and timely and accurate decisions for claimants
Goal 3. Collaboration with partners identified within the WIOA Combined State Plan will be enhanced.
Goal 4. A strategy for increasing consistent staff training and practice will be implemented.

(B) support innovation and expansion activities; and

DORS sets aside $89,000 from the Title I grant to support the innovation and expansion activities of the MD Statewide Independent Living Council.

(C) overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

See Strategic Plan goals stated above in (A).

(p) Evaluation and Reports of Progress: VR and Supported Employment Goals.

Describe:

(1) An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed PY were achieved. The evaluation must:
(A) Identify the strategies that contributed to the achievement of the goals.
(B) Describe the factors that impeded the achievement of the goals and priorities.

Goal 1: Assure high-quality integrated employment outcomes for individuals with significant and most significant disabilities in Maryland through the VR program.

Objective 1.1 - Provide quality customer service consistent with the Governor's Customer Service Promise.

Strategies: DORS will

1. Ensure staff follow the principles of the Governor's Customer Service Promise.
2. Monitor internal strategy for evaluating customer satisfaction during service delivery in partnership with the State Rehabilitation Council (Needs Assessment Rec. 6).
3. Improve communication between DORS staff and consumers.
4. Continue to implement a Quality Assurance Review Program for VR to ensure consistency with required measures under WIOA.

Performance Measures by September 30, 2019:

a. Continue to review feedback on the Governor's Customer Service Promise and respond as needed, and participate in MSDE's customer service training.

   DORS has continued to offer feedback on the Governor's Customer Service Promise as provided and strive toward increasing Customer Service. All DORS staff participated in Customer Service Training, and have included links to the Governor's 3-question Customer Satisfaction Survey in their email signatures.

b. Conduct Customer Satisfaction Survey on a quarterly basis for consumers to provide feedback on their satisfaction with services at key points during the rehabilitation process.

   Consumer Satisfaction Surveys of both open and closed cases were completed on a quarterly basis, using mail and electronic means to provide consumers with a variety of options to provide feedback. DORS management facilitates responses to customer surveys when follow-up is requested.

c. One Quality Assurance Case Review will be completed for each District during the FY and statewide Quality Assurance measures will improve in comparison to the previous FY.

   Beginning October 2018, DORS Quality Assurance Team conducted a second round of district Quality Assurance Case Reviews for each district. Significant improvement in case documentation and compliance with agency timeliness was noted.

Objective 1.2 - Provide rehabilitation services and pre-employment transition services in partnership with local education agencies that lead to successful outcomes in post-secondary education and employment for students with disabilities.

Strategies: DORS will

1. Ensure that VR counselors and staff work with high school students with disabilities, families, school personnel, business partners, and community partners to help these students prepare for and achieve employment and self-sufficiency.
2. Formalize consistent partnerships with MSDE and LSSs to ensure access to required/CORE Pre-ETS and Transition services throughout the state.

3. Emphasize and implement pre-ETS and transition services to promote long-term career success and leadership.
4. Provide training and support to DORS transition counselors and pre-employment transition services counselors and partners through the Transition Specialists Group and other meetings and training programs. Training shall help counselors identify and develop tools and resources related to post-secondary education, and best practices in working with families and transitioning students.

Performance Measures by September 30, 2019:

a. The number of students and youth with disabilities served will match or exceed those served in the previous year, including an increase in the number of students receiving pre-employment transition services compared with the previous year.

   In FY 2019, 7,479 students and youth with disabilities received VR services, along with 5,700 students receiving pre-employment transition services. This represents a significant increase over FY 2018. (7,299 students and youth with disabilities received VR services and 3,640 students received pre-employment transition services.)

b. Finalize Memorandum of Understanding with MSDE Special Education and MD Department of Disabilities (MDOD) for a Student Tracker System and begin a pilot of the system.

   MOU has been completed; planning is ongoing to determine scope and details of system pilot.

c. Update existing Memoranda of Understanding with 24 Local Education Agencies, MD School for the Deaf, MD School for the Blind, and MSDE Division of Special Education in place between DORS and State Education Agency.

   MOU update is ongoing; agreements in various stages of progress.

d. Increase the number of Pre-ETS and Transition service provided to youth and Students with Disabilities as documented through authorizations and Actual Service records, as compared to the previous year.

   Agency staff are developing training initiatives to support increased usage of Actual Services to document services provided through Work-Based Learning agreements.

e. There will be an increase in transitioning youth with disabilities who achieve employment and/or enroll in post-secondary education programs, compared with the previous year.

   During FY 2019, 342 transition youth achieved employment outcomes (FY 18: 407), and DORS authorized college/university, WTC Career and Technology Training, and Vocational/Occupational Skills Training for 415 youth (FY 18: 491). Reduced outcomes

resulted from increased emphasis on provision of pre-employment transition services and the DORS waiting list for VR services.

f. The DORS Transition Specialists Group will meet at least semiannually and include staff training on pertinent topics (e.g. pre-employment transition services), and will identify, develop and disseminate tools and resources for transitioning students related to post-secondary education.

   Transition Specialists Group has conducted quarterly meetings during FY 2019. Additionally, "Transition News" an agency quarterly newsletter has been distributed to agency staff and partners to disseminate information and highlight success.

Objective 1.3 - DORS will provide high quality services and outcomes for individuals with disabilities served by the Office of Field Services (OFS).

Strategies: DORS will

1. Provide high quality comprehensive services to eligible individuals with significant disabilities in accordance with the WIOA and Federal Regulations, the Code of Maryland Regulations, and DORS Policy.
2. Collaborate with WTC in assuring consumers with all disabilities receive services offered at WTC in a seamless and timely manner.
3. Strengthen relationships with WIOA partners to improve competitive integrated employment outcomes for DORS consumers and reporting on common performance measures for DORS consumers.
4. Implement training and begin accurately recording Educational Goals and outcomes.

Performance Measures by September 30, 2019:

a. Meet federal performance standards for timely determination of eligibility and development of the Individualized Plan for Employment.

   During FY 2019, OFS achieved 94 percent eligibility determination timeliness compliance, compared to 95 percent in FY 2018, and 91 percent Individualized Plan for Employment development timeliness compliance compared to 91.8 percent in FY 2018.

b. Enhance consumer employment outcomes as measured by an increase in average hourly earnings from the previous year.

   During FY 2019, the average hourly wage was $12.99, representing a .85 increase from FY18 ($12.14).

c. Provide staff training related to the new federal and state common measures for WIOA Core Programs.

   Ongoing training opportunities have been offered throughout the state during FY 2019.

d. OFS will achieve 1,303 Competitive Integrated Employment Outcomes.

   In FY 2019, OFS achieved 1,209 successful employment outcomes, 93 percent of goal. Reduced outcomes resulted from increased emphasis on provision of pre-employment transition services and the DORS waiting list for VR services**.**

e. Establish baseline for number of documented Educational Goals.

   Progress for Education goals has been ongoing. DORS has begun shifting focus to include number of Measurable Skills Gains and Credentials, in addition to Educational Goals.

Objective 1.4 - DORS will provide high-quality services and outcomes for individuals who are blind, vision impaired and Deaf-Blind (B/VI, D-B).

Strategies: DORS will

1. Provide high quality comprehensive services to eligible individuals who are blind, vision impaired and Deaf-Blind in accordance with the WIOA and Federal Regulations, the Code of Maryland Regulations, the Randolph Shepard Act and DORS Policy.
2. Provide independent living services to older individuals who are blind through direct services of DORS rehabilitation teachers.
3. Collaborate with WTC to enhance services and educate staff to assure that blind, vision impaired and Deaf-Blind consumers have effective programming at WTC.
4. Enhance collaboration with businesses and work force partners to include customized training, education, disability awareness, and worksite support to facilitate increased competitive integrated employment opportunities for OBVS consumers.
5. Continue to expand services and outreach to individuals who are deaf-blind and provide technical assistance to staff serving this population as recommended by the Deaf-Blind Workgroup.
6. Recruit and train Maryland Business Enterprise Program for the Blind vendors, and grow the program strategically.
7. Develop a standardized curriculum of activities for OBVS staff to ensure highly qualified staff to provide excellent service and increase customer satisfaction.
8. Implement training and begin accurately recording Educational Goals and outcomes.

Performance Measures by September 30, 2019:

a. Meet federal performance standards for timely determination of eligibility and development of the Individualized Plan for Employment.

   During FY 2019, OBVS achieved 92 percent eligibility determination timeliness compliance, compared to 96 percent in FY 2018, and 78 percent Individualized Plan for Employment development timeliness compliance compared to 75 percent in FY 2018.

b. OBVS will achieve 80 competitive integrated employment outcomes.

During FY 2019, OBVS achieved 47 competitive integrated employment outcomes.

c. The Business Enterprise Program will recruit/train/license five new managers and establish new vending sites where available.

   In FY 2019, the Maryland Enterprise Program for the Blind (BEP) recruited, trained and licensed three new managers. The BEP continues to grow the program and locate new facilities that will provide a livable income for Maryland Vendors.

d. OBVS will close 190 ILOB cases successful.

   OBVS closed 164 ILOB cases successful by DORS teachers for the blind during FY 2019.

e. An increased number of consumers who are blind/vision impaired or Deaf-Blind will be referred to WTC compared to the previous year.

   This information is not reported due to the Deaf-Blind Specialist vacancy; position filled on 12/4/19.

f. The Deaf-Blind Workgroup will meet three times per year to identify and expand services for the Deaf-Blind.

   This information is not reported due to the Deaf-Blind Specialist vacancy.

g. Increase staff competencies and proficiencies to serve OBVS population.

   OBVS staff continue to grow in their specialized competencies and proficiencies through participating in quarterly meetings/trainings, four times per year.

h. Establish baseline for number of documented Educational Goals.

   This information is not reported; training was recently provided to staff.

i. Provide staff training related to the new federal and state common measures for WIOA Core Programs.

   OBVS staff participate in trainings related to the new federal and state common measures for WIOA Core Programs, four times per year.

Objective 1.5 - Provide effective pre-employment transition services and employment services at the Workforce & Technology Center using state-of-the-art interdisciplinary strategies.

Strategies: DORS will

1. Continue to provide high quality comprehensive services to individuals with significant disabilities to facilitate successful competitive integrated employment outcomes.
2. Continue to develop and enhance relationships with employers utilizing agency staff who specialize in underserved populations to address service needs; as well as, issues and trends related to the employment of underserved disability populations.
3. Enhance linkages between employers, the business community, DORS Business Services staff, and community partners.
4. Implement strategies for WTC staff to collaborate with OFS and OBVS to enhance consumer services for pre-employment transition services and services for transitioning youth.
5. Continue to provide comprehensive services and awareness to employers to enhance knowledge and understanding of the benefit of assistive technology at the worksite.
6. Develop and implement a system for WTC staff to document measurable skills gains/ credentials for individuals served.
7. Investigate the feasibility of a system with WIOA partners for the sharing of training resources for individuals served.

Performance Measures by September 30, 2019:

a. Increase the number of consumers achieving competitive integrated employment outcomes compared to the previous year.

   The number of consumers achieving competitive integrated employment outcomes decreased from 292 (FY 18) to 258 (FY 19).

b. Increase the number of consumers who are blind/vision impaired and Deaf-Blind who will receive services compared to the previous year.

   The number of consumers who are blind/vision impaired who received services decreased from 376 (FY 18) to 359 (FY19). The number of consumers who are Deaf-Blind who received services increased from 27 (FY 18) to 38 (FY 19).

c. Increase the number of consumers who are deaf or hard-of-hearing who will receive services compared to the previous year.

   The number of consumers who are deaf or hard-of-hearing who received services decreased from 205 (FY 18) to 197 (FY 19).

d. Increase the number of consumers who are Autistic who will receive services compared to the previous year.

   The number of consumers served who have Autism increased from 297 (FY 18) to 362 (FY 19).

e. Increase the number of customized and/or partnership trainings compared to the previous year.

The number of customized and/or partnership trainings (18) stayed the same in FY 2018 to FY 2019.

f. Participate in the division-wide Business Services Team which will implement collaborative projects between OFS, OBVS, and WTC to enhance the Agency's provision and documentation of employer engagement.

   Designated WTC staff participated in division-wide collaborative projects such as the Maryland Apprenticeship Think Tank to enhance the provision and documentation of employer engagement.

g. Designated WTC staff will attend the statewide quarterly Pre-ETS / Transitioning Youth meeting facilitated by the agency's Staff Specialist for Transition Services to enhance and/or develop new WTC programs.

   Designated WTC staff attended the statewide Pre-ETS/Transitioning Youth meetings.

h. Increase the number of worksite consumers served as compared to the previous year.

   The number of worksite consumers served decreased from 70 (FY 18) to 57 (FY 19).

i. Establish a baseline for number of documented measurable skills gains/credentials for individuals served at WTC.

   The baseline for number of documented measureable skills gains/credentials for individuals served at WTC was established as 289.

j. Establish a workgroup to investigate the feasibility of a system for sharing training resources with WIOA partners.

   A workgroup was not established this year. This goal will be implemented in the next program year by establishing a working relationship with the newly hired MD Labor Training Coordinator.

Goal 2: This goal focuses on a non-VR program that is not applicable to the WIOA State Plan. (Disability Determination Services program).

Goal 3: Partner and collaborate with other WIOA programs, private organizations, employers, and community groups to advance the employment and independence of individuals with disabilities.

Objective 3.1 - Evaluate and monitor service delivery for consistency with priorities within WIOA.

Strategies: DORS will

1. DORS staff and WIOA partners will participate in joint trainings to learn about services available at the state and local level.
2. Contribute to the tracking of the Benchmarks of Success for Maryland's Workforce System.
3. Participate in local planning meetings regarding service provision and collaboration in AJCs to strengthen referral procedures and tracking of consumer involvement with WIOA partners.
4. Promote the Employment First approach for individuals currently employed in subminimum wage positions by 14c license holders.
5. Ensure completion of the Comprehensive Statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland.

Performance Measures by September 30, 2019:

a. DORS participation in training activities with WIOA partners will be documented.

   Some highlights include: Raising the Bar Conference; Maryland Rehabilitation Conference; Specialty Population training was provided by Deaf & Hard of Hearing Specialist and OVBS staff to WIOA partners, and agency field staff also participated in many Regional training events.

b. DORS data specific to the Benchmarks for Success will be shared as requested.

   DORS Staff has provided regular updates and information to Benchmarks of Success for Maryland's Workforce System. DORS is also a representative member of the Benchmarks Data and Dashboard Committee.

c. A baseline number of individuals, including individuals on the waitlist, involved in services provided by WIOA partners will be determined, using AWARE documentation.

   Baseline information of individual served by WIOA partners has been determined using RSA-911 quarterly reporting data. Strategies to increase referrals and partnerships are under consideration.

d. Group career counseling and information sessions will be provided to individuals employed in subminimum wage positions.

   Information has continued to be provided to individuals employed in subminimum wage positions. The Ken Capone Equal Employment Act (EEA), will abolish the payment of subminimum wages to people with disabilities in Maryland by 2020.

e. The 2019 Comprehensive Statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland will be completed.

The 2019 Comprehensive Statewide Assessment of the Rehabilitation Needs of Individuals with Disabilities in Maryland has been completed and submitted September 30, 2019.

Objective 3.2 - Enhance collaboration with and services to Maryland private and public employers.

Strategies: DORS will

1. Continue to have the Business Services Representatives in each region and WTC Employment Specialists provide and enhance services to businesses to include recruitment assistance, technical assistance for tax incentives, development of work-based learning opportunities, OJT and customized training, retention services, and disability awareness and ADA training.
2. Engage with businesses through the CSAVR National Employment Team (NET).
3. Collaborate with WIOA partners and community rehabilitation programs to leverage business contacts, share resources and expertise, and coordinate services that are beneficial to businesses and promote the employment of individuals with disabilities.
4. Partner with businesses to connect them to DORS job seekers through tours, career information sessions, job fairs, and other direct means.

Performance Measures by September 30, 2019:

a. The number of services to business will increase as compared to the previous year, and will be documented in the AWARE employer module to measure effectiveness in serving employers.

   The following individual employer services were documented in AWARE: Business Development 734; Disability Training 29; OJT/Customized Employment 163; Partnership Activity 178; PETs 7; Recruitment Assistance 321; Retention Services 142; Tax Incentives 6; Work-Based Learning 163. The total number of direct services documented were down 158 from the previous year (FY 18 1901, FY 2019 1743. However, there were two Business Services Representative positions vacant during the FY.

b. The number of work-based learning opportunities, including, but not limited to, QUEST, Summer Youth Employment, and OJT opportunities will increase as compared to the previous year and be tracked through the AWARE case management system.

   The number of consumers participating in QUEST for FY 2019 was 44, an increase of four from last FY. There was also a 34 percent increase in the number of Youth (14-24) participating in QUEST, including one student. There were nine OJT Wage Reimbursement Agreements with employers, a decline of 3; two of those were for high school students with Herr Foods. There were 808 youth who participated in Summer Youth Employment Programs, an increase of 109.

c. Minutes of CSAVR NET meetings and business services reports will confirm activities and progress.

   The Business Relations Manager (NET Point of Contact) and WTC Employment Services Supervisor receive regular updates on NET activities and participated on conference calls and webinars with a number of national employers, including CVS, Starbucks, Amazon, Aetna, Hewlett Packard, Microsoft, Facebook, Wells Fargo, Sephora, Bank of America, U.S. Department of Agriculture, Federal Aviation Administration, Forest Service, and Department of Transportation.

   The NET POC participated in the CSAVR Employment Committee meeting during the fall and spring conferences. Additionally, Maryland DORS Business Relations and partner employer, SBM Management Services, participated on a Business Panel presentation at the CSAVR Spring Conference.

   Maryland DORS Business Relations also hosted the CSAVR 2019 NET Summit in Baltimore on August 6-7, 2019. The NET POC and WTC Employment Services Supervisor attended the Disability: IN Conference in Chicago and supported The NET exhibit and activities.

d. Monthly reports from Business Service Representatives will show evidence of activities with agency partners.

   Monthly reports from the statewide BSRs continue to show increased collaboration and activities with MD Labor Business Services, AJC staff, Community Rehabilitation Program job coaches/developers and employment specialists and other agencies engaged with businesses. In many Local Areas, business services teams meet regularly to coordinate activities, such as job fairs, recruitment events and trainings for employers. One excellent example was the Eastern Shore Business Summit held on August 8, 2019. The Lower Shore Business Services team worked with the local SHRM, Salisbury University and employers to host a day-long event that included training on current topics of interest to local businesses. The DORS BSR took a leadership role in this activity. BSRs also coordinated ADA training for job seekers and AJC staff in various areas of the state.

e. Business partner activities will be tracked in the AWARE Employer module and increase over previous year.

   Partnership Activities documented in AWARE were 178 for FY 2019, compared to 244 for FY 2018. The two vacant positions contributed to this decline.

Objective 3.3 - DORS will provide support to the State Rehabilitation Council (SRC) to maintain and enhance its leadership role in the oversight of VR service delivery in Maryland.

Strategies: DORS will

1. DORS will ensure that it works with the State Rehabilitation Council (SRC) in accordance with federal law and regulations and Council By-Laws.
2. Council members will review and comment on the Annual Agency Program Plan, DORS progress in meeting its performance goals, and DORS program accomplishments

Performance Measures by September 30, 2019:

The Maryland SRC will conduct four quarterly meetings.

SRC meetings were held May 8th, August 22nd, September 11th, and November 13th, 2019.

The Maryland SRC and DORS will conduct annual public meetings.

DORS and the MSRC held two public meetings in 2019: on July 10th at 10:00 AM and on July 11th at 4:00 PM. A call-in option was also available and American Sign Language interpreters were at the in-person meetings.

Objective 3.4 - Promote and enhance quality independent living outcomes for individuals with disabilities in Maryland through independent living programs.

Strategies: DORS will

1. Provide grant support, technical assistance and monitoring to the Statewide Independent Living Council (SILC).
2. Manage DORS grants to Centers for Independent Living (CILs), including providing technical assistance and monitoring regarding the IL program, the IL AT program, and fiscal responsibilities.
3. Participate as an IL Partner in implementation of the 2017-2019 State Plan for Independent Living.
4. Regional Directors and OBVS Supervisors will conduct an annual meeting with Executive Directors of ClLs within their areas to discuss issues of mutual interest.

Performance Measures by September 30, 2019:

1. Annual reviews of grant performance will be conducted for each CIL with which DORS has a grant, and the Statewide Independent Living Council.
2. DORS Regional/Program directors will confirm at least annual meetings with CIL Executive Directors.

DORS Regional Directors maintain contact with the local CIL Executive Directors at least once a year, and often more frequently, to discuss mutual service delivery concerns

Objective 3.5 - Evaluate partner connection for consumers receiving Social Security Benefits.

Strategies: DORS will

1. Ensure order of selection assignments for individuals with Social security benefits are accurate.
2. Referrals will be made for Social Security recipients on the waitlist to employment networks and the WIPPA.
3. Participants who receive Social Security benefits in employed status will be referred to an employment network.
4. Ensure fee for service benefits planning is completed for all appropriate Social Security recipients.

Performance Measures by September 30, 2019:

a. DORS counselors and supervisors will receive information regarding Social Security eligibility requirements.

   The Social Security Programs Unit provides periodic training, informational bulletins, and guidance on SSA eligibility and other changes. The unit responds to over 3300 requests annually for verification of Social Security benefits through the case management Activity Due system. The unit is coordinating with Alliance Enterprises on a batch process whereby 100 percent of all cases will be reviewed for benefits verification for the purpose of eligibility and order of selection. This process should be live within the next FY.

b. DORS will establish a baseline number of individuals in delayed status referred to employment networks and the WIPPA on the Special Programs page.

   The Social Security Programs Unit has identified that, on average, ca. 1050 individuals on the waitlist are SSA disability beneficiaries. A process for referral to EN or WIPA was implemented whereby EN contact information is included in waitlist letters generated to each consumer on the waitlist. However, as this is consumer choice, many do not choose to connect to ENs. Currently, ca. 50 waitlist consumers have assigned their Ticket to Work to another Employment Network and have chosen to remain on the waitlist. The unit is not currently able to track if individuals have chosen to close from the waitlist and remain connected to an EN. Finally, the unit is currently coordinating with SSA, Maximus Ticket Program Manager, and the Partnership Plus Employment Networks in Maryland to refine the referral process for individuals on delayed using a batch process and coordination through SSA's Ticket to Work Portal. This is not yet live.

c. DORS will establish a baseline number of participants with Social Security benefits referred to an Employment Network after obtaining employment.

   The Social Security Programs Unit has developed policy and procedures to identify Employment Network Handoff candidates (those with Ticket to Work assigned to DORS, employed at or near Substantial Gainful Employment, and who have signed consent to EN coordination on file). A monthly report is generated by the unit and will be provided to Executive Staff so that referral reminders to ENs can be provided by counselors and so that

a list of referral candidates can be sent directly to ENs. Current numbers average around ten to 15 possible handoff candidates monthly. Therefore, handoff will likely begin as a bimonthly effort (starting 12/2019) until more consent forms are in place and closure numbers of Ticket-holders increase. This process is independent of a handoff effort that was put in place in 10/2018 which utilizes benefits planning fee-for-service vendors who provide EN handoff information to consumers. However, as this is informed choice and would occur after case closure, a baseline number of consumers who link after VR closure is more difficult to track internally. To compensate, the unit coordinates with Maximus Ticket Program Manager to receive a monthly report of those handoffs. For the most recent months on record, the average handoff to EN is between four and six individuals. This number is deflated due to Maximus' definition of handoff being limited to only those handoffs that result in payment from SSA to the EN. Thus these figures would be higher when calculating in individuals linked to ENs who have not yet attained SGA wages.

d. The number of Social Security beneficiaries receiving fee-for-service benefits counseling will increase as compared to the previous FY.

   The Social Security Programs Unit measures this figure by calculating the annual average percentage for cases closed for Social Security beneficiaries who were eligible for benefits planning and received the service. In FY2018, the average was 35 percent received, in FY2019 the average was 39 percent (under the new fee-for-service model), and in FY2020 the average to date is 47 percent.

Goal 4: Provide infrastructure to promote and support the accomplishment of the DORS mission

Objective 4.1 - Implement strategies required by WIOA and in accordance with the Combined State Plan.

Strategies: DORS will

1. DORS will continue to implement Memoranda of Understanding /Resource Sharing Agreements with workforce partners required to fulfill new federal reporting requirements.
2. Continue and expand electronic communication with DORS consumers throughout the case process including post-exit.
3. Explore data collection systems with WIOA partners to facilitate the collection of federal reporting requirements, including consumer involvement with WIOA partner agencies.
4. DORS staff and agency partners will be given opportunities to received internal technical assistance and training regarding WIOA implementation.

Performance Measures by September 30, 2019:

a. Memoranda of Understanding and Resource Sharing Agreements will be completed on an as needed basis to conform to State and Federal regulations.

Updates to Memoranda of Understanding and Resource Sharing Agreements are regularly monitored and have been updated accordingly.

b. Electronic communication procedures for requesting and collecting information and input from DORS consumers will be implemented and updated in the RSM.

   Administration has continued to explore multiple methods of electronic communication to collect consumer information, including expanded uses of Survey Gizmo and GovDelivery.

c. Recommendations for data collection systems will be reviewed as available.

   MIS director has completed RFP and is currently reviewing proposals for bi-directional communication platform to facilitate improved data collection and increased use of electronic communication with participants.

d. Staff will be provided technical assistance on a topic related to WIOA at least quarterly.

   DORS has included WIOA topics in counselor specialty workgroups and various agency training opportunities.

Objective 4.2 - Increase staff competency and satisfaction by providing ongoing staff training, professional development, and leadership development programs while intentionally promoting a culture of staff retention.

Strategies: DORS will

1. Establish an Internal Communications Workgroup to recommend a methodology which will ensure all staff receive clear and consistent communication.
2. Establish a New Counselor Training Workgroup to develop a protocol for training new counselors prior to caseload assignment.
3. Develop a comprehensive training series for new Supervisors to include personnel management and case management functions.
4. DORS staff will be encouraged to access on-line/web-based learning management systems to address ongoing training needs.
5. Leadership development and cross-training opportunities will be provided to ensure continuation of critical agency functions.
6. Continue to support DORS staff obtaining advanced degrees in VR and related fields.
7. Conduct at least quarterly trainings of Business Services staff to enhance their skills and develop strategies for engaging businesses.
8. Develop and utilize a DORS Employee Satisfaction Survey.

Performance Measures by September 30, 2019:

a. Internal Communication Workgroup recommendations will be provided to executive staff.

An Internal Communication Workgroup was not established in FY 2019 but this goal will be implemented during FY 20.

b. New Counselor Training Workgroup recommendations will be provided to executive staff.

   A New Counselor Training Workgroup was established in FY 2019 and recommendations were discussed with executive staff.

c. Management trainings for new DORS supervisors will be offered twice during the FY.

   Management trainings for new DORS supervisors were offered three times during FY 2019.

d. Staff use of on-line/web based learning management systems will increase during the FY.

   Staff participated in online/web-based learning opportunities in FY 2019 and the agency is moving forward with making more training opportunities available via a learning management system in FY 20.

e. At least one multi-session leadership development program with a cross-training component will be offered during the FY.

   DORS provided two multi-session leadership opportunities: (1) Executive Leadership Institute and (2) Leadership Exploration and Agency Programs. DORS supported staff participation in three externally sponsored programs: The National Rehabilitation Leadership Institute, Supervisory Bootcamp, and the VR Supervisor Academy.

f. Staff enrollment in graduate school programs will increase from the previous FY.

   Staff enrollment in graduate school decreased from 20 staff members in FY 2018 (Fall 2017, Spring 2018 and Summer 2018 semesters) to 17 staff members in FY 2019 (Fall 2018, Spring 2019 and Summer 2019 semesters).

g. Agendas and minutes of Business Services meetings will document training progress.

   In FY 2019, the Business Services Department kept track of their agendas and minutes during meetings and trainings.

h. Employee Satisfaction will be surveyed.

   DORS employees did not participate in satisfaction surveys during FY 2019. This goal will be implemented in FY 2020 and exit interviews will also be established.

Objective 4.3 - Promote strategic use of accessible technology and establish policy and internal controls to support staff effectiveness and efficiency.

Strategies: DORS will

1. Implement the recommendations from the Technology Tips Workgroup identified as Year One Key Actions in the DORS Strategic Plan for 2019-2021.
2. Ensure staff resources are aligned to the agency priorities to serve customers and claimants effectively.
3. Review, update, and document internal controls and streamline case management, communication, and administrative procedures to reduce errors and establish consistency statewide.
4. Convene a workgroup of program managers and staff specialists to develop a consistent vendor application and approval process and monitoring protocol.

Performance Measures by September 30, 2019:

a. DORS Strategic Plan Information Technology Key Actions for Year One will be implemented.

b. DORS intranet will be updated.

   DORS intranet has been regularly maintained and updated. Plans for a system platform update are being coordinated with the Department of Information Technology (DoIT).

c. E-Fax will be used for inbound and outbound communication.

   DORS began to utilize Retarus eFax services in January 2019 for confidential document sharing. Agency MIS Director has provided ongoing staff training and support to end users.

d. DORS will have identified technology for collecting e-signatures.

   DORS staff have discussed technology available in conjunction with Alliance Enterprises to pursue ability to integrate e-signatures with the AWARE case management system. Current model is in development, and has not yet progressed to beta testing. DORS has also researched options within Adobe and Microsoft software platforms.

e. Expand use of GovDelivery to send appointment reminders to customers and solicit post-exit follow-up.

   GovDelivery has not yet been integrated to send appointment reminders and post-exit information. DORS has purchased a customization to the AWARE case management platform that has provided the ability to query scheduled appointments for export to messaging platform.

f. Position descriptions will be reviewed and revised, as necessary, for consistency with Agency priorities to ensure appropriate distribution of Agency resources.

Position description review and revision are ongoing. Several positions have been modified to include updated duties and responsibilities

g. DORS required forms and administrative procedures will be reviewed and streamlined

DORS Policy Review Council has increased meeting frequency to bi-monthly and has continued to evaluate agency process and materials. Policy Review Forms Committee has been established to concentrate on agency form updates. Updated policies and materials are included in the RSM.

h. Establish internal control procedures for the vendor application and approval process and monitoring vendor performance.

Vendor application and approval process is ongoing. Staff Specialists for Community Rehabilitation Providers have been conducting process ongoing; executive staff have included this topic in bi-monthly internal control meetings.

(2) An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent PY were achieved. The evaluation must:
(A) Identify the strategies that contributed to the achievement of the goals.

Supported employment services are defined in the regulations as ongoing support services and other appropriate services needed to support and maintain an individual with the most significant disability in supported employment, as well as services to establish and maintain a supported business enterprise or customized employment. The quality, scope, and extent of supported employment services are consistent with the definition of supported employment as it is contained in the Rehabilitation Act of 1973, as amended. Supported employment means competitive work in integrated work settings or employment in integrated work settings. Individuals with the most significant disabilities are working toward competitive work consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. These are persons including youth with the most significant disabilities:

- For whom competitive employment has not traditionally occurred or for whom competitive employment has been interrupted or intermittent as a result of a significant disability and
- Who, because of the nature and severity of a disability, need intensive supported employment services from the designated state unit, DORS, and extended services after transition in order to perform this work.

Strategies:

- The quality of supported employment services is assured through the Division's case review process. Records are reviewed in terms of eligibility, Individualized Plan for Employment, service delivery, case closure, and expenditures. The review emphasizes technical compliance with the Title I and Title VI-B regulations. DORS uses case review findings to identify policies that may require modification or clarification and to identify

staff training needs. DORS also conducts periodic onsite reviews of supported employment providers to assure compliance with established policy and procedure and regularly updates cooperative agreements with these facilities.

- As required by the WIOA of 2014, 50 percent of the total Supported Employment Allotment is utilized to provide supported employment services, including extended services, to youth with the most significant disabilities.
- The scope of supported employment services is contained in DORS' Rehabilitation Services Manual II, Section 800. DORS provides ongoing training to counselors about supported employment policy and best practices, including to new staff at the Quality Rehabilitation Training Program conducted at least twice a year.
- In recognition of the time required to develop employment opportunities and place individuals with the most significant disabilities in employment, DORS policy permits payment of job development and placement as discrete activities within "job coaching". However, these activities are paid for using Title I, rather than Title VI, funds.
- Supported employment services include, but are not limited to, the following:

1. Job coaching assistance to stabilize an individual in competitive integrated employment settings for the maximum number of hours possible based on the unique strengths, resources, interests, concerns, abilities, and capabilities of individuals with the most significant disabilities;
2. Intensive on-site job skills training and other training provided by skilled job trainers, coworkers, and other qualified individuals;
3. Off-site supports to address issues and concerns;
4. Follow-up services, including regular contact with employers, trainers, parents, guardians, or other representatives of trainees, and other suitable professional and informed advisors to reinforce and stabilize the job placement;
5. Other services specified in the regulations needed to achieve and maintain job stability; and/or
6. Discrete post-employment services following transition that are unavailable from an extended services provider and that are necessary to maintain the job placement.

All supported employment services are available to all individuals, including youth with the most significant disabilities, determined eligible to receive supported employment services. Individuals are eligible if:

1. The individual is eligible for VR services;
2. The individual is determined to be an individual with a most significant disability;
3. A comprehensive assessment of rehabilitation needs of the individual, including an evaluation of rehabilitation, career, and job needs, identifies whether or not supported employment is the appropriate rehabilitation objective.

- If Supported Employment is not found to be appropriate at the time of comprehensive assessment, DORS will reassess annually.

(B) Describe the factors that impeded the achievement of the goals and priorities.

During FY 2019, DORS served 5327 individuals with supported employment identified as a service on their IPEs, which exceeded the goal to serve 4,000. During FY19, DORS and the Maryland Behavioral Health Administration (BHA) have been updating the Memorandum of Understanding to meet the requirements under WIOA, specifically, the process for serving youth with serious and persistent mental illness. This agreement, which identifies the roles and responsibilities of both partners at the state and local level, will further strengthen the collaborative relationship between both agencies. DORS anticipates finalizing this agreement in 2020.

In FY18, DORS and DDA updated and signed a cooperative agreement which reflects collaborative practices related to WIOA and specifies appropriate referral processes

(3) The VR program's performance on the performance accountability indicators under section 116 of WIOA.
(4) How the funds reserved for innovation and expansion (I&E) activities were utilized.

100 percent of Title VI: Supported Employment funds are utilized to provide supported employment services for adults and youth with most significant disabilities.

(q) Quality, Scope, and Extent of Supported Employment Services.

Include the following:

(1) The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

The quality, scope, and extent of supported employment services are consistent with the definition of supported employment as it is contained in the Rehabilitation Act of 1973, as amended. As required by the WIOA of 2014, 50 percent of the total Supported Employment Allotment will be utilized to provide supported employment services, including extended services, to youth with the most significant disabilities.

The quality of supported employment services is assured through the Division's case review process. Records are reviewed in terms of eligibility, Individualized Plan for Employment, service delivery, case closure, and expenditures. The review emphasizes technical compliance with the Title I and Title VI-B regulations. DORS uses case review findings to identify policies that may require modification or clarification and to identify staff training needs. DORS also conducts periodic onsite reviews of supported employment providers to assure compliance with established policy and procedure and regularly updates cooperative agreements with these facilities.

Supported employment means competitive employment in an integrated setting, or employment in integrated work settings in which individuals are working toward competitive employment, consistent with the strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individuals with ongoing support services for individuals with the most significant disabilities:

- For whom competitive employment has not traditionally occurred or for whom competitive employment has been interrupted or intermittent as a result of a significant disability; and
- Who, because of the nature and severity of a disabilities, need intensive supported employment services and extended services after transition in order to perform this work.

The scope of supported employment services is contained in DORS' Rehabilitation Services Manual II, Section 800. DORS provides ongoing training to counselors about supported employment policy and best practices, including to new staff at the Quality Rehabilitation Training Program conducted at least twice a year.

Supported employment services are defined in the regulations as ongoing support services and other appropriate services needed to support and maintain an individual with the most significant disability in supported employment.

In recognition of the time required to develop employment opportunities and place individuals with the most significant disabilities in employment, DORS policy permits payment of job development and placement as discrete activities within "job coaching". Supported employment services are any services that assist an individual in entering or maintaining integrated, competitive employment. They also include services necessary to establish and maintain a supported business enterprise. They may include, but are not limited to, the following:

- Development of and placement in jobs or businesses in integrated settings for the maximum number of hours possible based on the unique strengths, resources, interests, concerns, abilities, and capabilities of individuals with the most significant disabilities;
- Intensive on-site job skills training and other training provided by skilled job trainers, coworkers, and other qualified individuals;
- Off-site supports to address issues and concerns;
- Follow-up services, including regular contact with employers, trainers, parents, guardians, or other representatives of trainees, and other suitable professional and informed advisors to reinforce and stabilize the job placement;
- Other services specified in the regulations needed to achieve and maintain job stability; and/or
- Discrete post-employment services following transition that are unavailable from an extended services provider and that are necessary to maintain the job placement.

All supported employment services are available to all individuals, including youth with the most significant disabilities, determined eligible to receive supported employment services. Individuals are eligible if:

- The individual is eligible for VR services;
- The individual is determined to be an individual with a most significant disability;
- A comprehensive assessment of rehabilitation needs of the individual, including an evaluation of rehabilitation, career, and job needs, identifies whether or not supported employment is the appropriate rehabilitation objective; and
- If Supported Employment is not found to be appropriate at the time of comprehensive assessment, DORS will reassess annually.

(2) The timing of transition to extended services.

Supported employment services are provided by DORS for a period not to exceed 24 months, unless under special circumstances the eligible individual and the rehabilitation counselor jointly agree to extend the time in order to achieve the rehabilitation objectives identified in the Individualized Plan for Employment. Services must occur at least twice monthly to assess the employment situation at the job site; at the request of the consumer, they may be conducted off-site. Service providers coordinate and provide intensive services, at or away from the job site, that are needed to maintain employment stability. Following transition, these services are only provided by DORS as post-employment services that are unavailable from an extended services provider and that are necessary to maintain or regain the job placement or advance in employment.

Extended Phase (Extended Service Provider)

Transition to extended services occurs when all objectives on the Individualized Plan for Employment and any amendments to the plan have been met, and the need for support has been reduced or faded to approximately 25 percent or less. This will occur on an individual and mutually agreed upon basis between the rehabilitation counselor, the consumer, and the provider. In the extended phase, ongoing support services and other appropriate services are defined as extended services. The provision of extended services in supported employment is made possible with cooperative agreements. Extended services include any service(s) needed for an individual to maintain integrated, competitive employment after the individual has transitioned from time-limited support provided by DORS. Such services are based on the needs of an eligible individual as specified in an Individualized Plan for Employment, which includes a statement of the source of the extended services.

Funding

The supported employment services, made possible by the anticipated state allotment, means that hundreds of individuals with the most significant disabilities will have an opportunity for competitive employment. An allotment of funds to provide supported employment services will be met with similar increases in other agencies' ongoing funds to maintain supported employment services when the DORS time-limited services are completed.

Evidence-Based Supported Employment

DORS has a strong partnership with Maryland's mental health system related to Evidence-Based Practice in Supported Employment. This is based on overwhelming evidence that supported employment is the most effective route to competitive employment for consumers with severe mental illness. The partnership is characterized by streamlined access to VR services through guest access of VR counselors into the Behavioral Health Administration's Administrative Service Organization's case management system; expedited eligibility determination for VR services for individuals determined eligible for Supported Employment through the Behavioral Health Administration; and adherence to principles of Evidence-based Practice in Supported Employment.

These principles include:

- Competitive employment is the goal.
- Eligibility for Evidence-Based Practice is based on consumer choice. Consumers are considered work ready when they say they want to work.
- Job search starts soon after a consumer expresses interest in working.
- Supported employment is integrated with treatment. Employment specialists have frequent meetings with the treatment team to integrate supported employment with mental health treatment. (DORS staff participation is critical to success.)
- Follow-along supports are continuous. Employment supports are never terminated unless the consumer directly requests it.
- Consumer preferences are important. Consumer preference plays a key role in determining the type of job that is sought, the nature of supports provided, and the decision about disability disclosure.
- Employment specialists practice systematic job development, based on consumer work preferences and face-to-face meetings with consumers, and gather information about job opportunities and assess whether they may be a good job fit for an individual. Employment specialists continue to make periodic visits to promote networking and achievement of employment.
- Personalized benefits planning is provided.

Evidence Based Practices in Supported Employment are funded using a braided model in which the Behavioral Health Administration pays for pre-placement services, VR funds job development, the Behavioral Health Administration funds placement, and VR funds intensive supports at the onset of employment. This effectively makes use of both systems' resources, allowing hundreds of consumers to receive Evidence Based Practices in Supported Employment.

Employment First

DORS is a partner with other state agencies, including WIOA partner MD Labor, and Community Rehabilitation Programs in implementing Employment First, a national effort to assure that all individuals with significant disabilities consider competitive, integrated employment on a preferred basis in planning for their lives. Employment First is consistent with DORS' belief that individuals with disabilities, even the most significant disabilities, can work in meaningful positions in integrated settings when provided with adequate, appropriate supports. Supported employment is appropriate for individuals in Employment First and is the means to assure the best chance for success in employment. Benefits planning is an important part of services for individuals served through Employment First.

VR Certifications and Assurances

Certifications

States must provide written and signed certifications that:

1. The (enter the name of designated State agency or designated State unit, as appropriate,) is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA,14 and its supplement under title VI of the Rehabilitation Act;

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the (enter the name of designated State agency) agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.

7. The (enter title of State officer below) has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;

8. The (enter title of State officer below) has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services;

9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.

ASSURANCES The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The State Plan must provide assurances that:

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

The State Plan must provide assurances that:

1. Public Comment on Policies and Procedures: The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: (a) the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act. (b) The establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act. The designated State agency or designated State unit, as applicable (Option A or B must be selected): (A) is an independent State commission. (B) Has established a State Rehabilitation Council. (c) Consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act. (d) the financial participation by the State, or if the State so elects, by the State and local agencies, to provide

the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3). (e) the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds, (Yes/No) (f) the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs, (Yes/No) (g) statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act. Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan. (h) The descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act. (i) All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act. (j) The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (k) the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act. (l) The reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities. (m) The submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

4. Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will: (a) comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act. (b) Impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act. (c) provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act? (Yes/No) (d) Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. (e) Comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. (f) Comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act. (g) Provide VR services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. (h) Comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required

by section 101(a)(14) of the Rehabilitation Act. (i) Meet the requirements in sections 101(a)(17) and 103(b)(2) of the 1. Rehabilitation Act if the State elects to construct, under special 2. circumstances, facilities for community rehabilitation programs (j) with respect to students with disabilities, the State, (i) has developed and will implement, (A) strategies to address the needs identified in the assessments; and (B) strategies to achieve the goals and priorities identified by the State, to improve and expand VR services for students with disabilities on a statewide basis; and (ii) has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement: (a) The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act. (b) The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act. (c) The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

6. (a) Financial Administration of the Supported Employment Program: The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than ten percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act. (b) The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

7. (a) Provision of Supported Employment Services: The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. (b) The designated State agency assures that: i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act ii. an individualized plan for employment that meets the requirements of section 102(b) of the

Rehabilitation Act , which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

Appendix 1. Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will

have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as "baseline" for the VR program for PY 2020 and PY 2021:

• Employment (Second Quarter after Exit);
• Employment (Fourth Quarter after Exit);
• Median Earnings (Second Quarter after Exit); and
• Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as "baseline, pursuant to section 116(d) of WIOA." The actual performance data reported by these programs for indicators designated as "baseline" for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as "baseline" for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as "baseline." Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state's plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Table 1. Employment (Second Quarter after Exit)

Program	**PY 2020 Expected Level**	**PY 2020 Negotiated Level**	**PY 2021 Expected Level**	**PY 2021 Negotiated Level**
Adults	-	-	-	-
Dislocated Workers	-	-	-	-
Youth	-	-	-	-
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	-	-	-	-
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1
Note: Performance levels have not yet been negotiated with federal partners.

Table 2. Employment (Fourth Quarter after Exit)

Program	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Adults	-	-	-	-
Dislocated Workers	-	-	-	-
Youth	-	-	-	-
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	-	-	-	-
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2
Note: Performance levels have not yet been negotiated with federal partners.

Table 3. Median Earnings (Second Quarter after Exit)

Program	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Adults	-	-	-	-
Dislocated Workers	-	-	-	-
Youth	-	-	-	-
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	-	-	-	-
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 3
Note: Performance levels have not yet been negotiated with federal partners.

Table 4. Credential Attainment Rate

Program	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Adults	-	-	-	-
Dislocated Workers	-	-	-	-
Youth	-	-	-	-
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	N/A	N/A	N/A	N/A
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

Note: Performance levels have not yet been negotiated with federal partners.

Table 5. Measureable Skill Gains

Program	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	42.00	42.00	43.00	43.00
Wagner-Peyser	N/A	N/A	N/A	N/A
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5
Note: Performance levels have not yet been negotiated with federal partners.

Table 6. Effectiveness in Serving Employers

Measure	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Line 1 (enter the measure information in the comments below)	Baseline	Baseline	Baseline	Baseline
Line 2	Baseline	Baseline	Baseline	Baseline
Line 3	Baseline	Baseline	Baseline	Baseline
Line 4	Baseline	Baseline	Baseline	Baseline
Line 5	Baseline	Baseline	Baseline	Baseline
Line 6	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6
Note: Performance levels have not yet been negotiated with federal partners.

Table 7. Additional Indicators of Performance

Measure	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
-	-	-	-	-

User remarks on Table 7
Not applicable

Appendix 2. Organizational Charts

Organizational charts for the WIOA Partner State Agencies can be found at the links below:

- Department of Labor (MD Labor) and Division of Workforce Development and Adult Learning (DWDAL) Organizational Charts: http://www.dllr.state.md.us/employment/wioadllrdwalorgchart.pdf
- MD Labor Division of Unemployment Insurance (DUI) Organizational Chart: http://www.dllr.state.md.us/employment/wioadllrduiorgchart.pdf
- Department of Human Services (DHS) Organizational Chart: http://www.dllr.state.md.us/employment/wioadhsorgchart.pdf
- Maryland State Department of Education (MSDE) Division of Rehabilitation Services (DORS): http://www.dllr.state.md.us/employment/wioamsdeorgchart.pdf
- Department of Housing and Community Development (DHCD) Organizational Chart: http://www.dllr.state.md.us/employment/wioadhcdorgchart.pdf

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult program, Dislocated Worker program, Youth program, Wagner-Peyser Act program, Adult Education and Family Literacy Act program, and the Vocational Rehabilitation program— and also submit relevant information for any of the eleven partner programs it elects to include in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. Plan partner programs are subject to the "common planning elements" in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program. If included, Combined State partner programs are subject to the "common planning elements" in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

TANF PROGRAM

(OMB Control Number: 0970-0145)
States that include TANF in the Combined State Plan must outline how the State will meet the requirements of section 402 of the Social Security Act including how it will:
(a) Conduct a program designed to serve all political subdivisions in the State (not necessarily in a uniform manner) that provides assistance to needy families with (or expecting) children and provides parents with job preparation, work, and support services to enable them to leave the program, specifically cash assistance, and become self-sufficient (section 402(a)(1)(A)(i) of the Social Security Act).

Overview of TANF Programs

TANF Programs are designed around four main purposes:

1. Provide assistance to needy families so that children can be cared for in their own homes;
2. Reduce the dependency of needy parents by promoting job preparation, work, and marriage;
3. Prevent and reduce the incidence of out–of–wedlock pregnancies; and
4. Encourage the formation and maintenance of two–parent families.

The State of Maryland's DHS Family Investment Program provides TANF children resources and support that they need to succeed as adults while providing older participants with the tools necessary to become self-sufficient as soon as possible. In Maryland, the TANF program is called TCA. The FIA Program assistance consists of services and cash assistance to eligible individuals. The assistance program components under Family Investment Program include TANF, Welfare Avoidance Grants, Child Care and Medical Assistance, as well as a full range of programs targeted at special issues and populations.

The TANF Federal Block Grant funds designated for workforce development are allocated to Maryland's 24 local jurisdictions recognizing that the local jurisdictions are able to accurately

target resources, programs, and services needed by their customers. Each local department submits a plan defining the program for their jurisdiction, which includes the core program components. The requirements and procedures may be tailored to fit the unique population of the jurisdiction.

Financial and technical eligibility criteria are the same for all programs, including those funded by state maintenance of effort, unless otherwise noted in program descriptions. The financial (income and resource) eligibility criteria for the Family Investment Program core components are found in the Code of Maryland Regulations section 07.03.03. Unless otherwise stated in their program descriptions, Family Investment Program non–core programs that are described as serving needy families have income criteria but do not have resource criteria.

TANF Partnership with WIOA for Enhanced Workforce Development Services
Currently, Maryland's TANF workforce programs are built on connecting individuals to work participation activities that ultimately result in permanent employment. LDSS workforce programs are operated through pay–for–performance vendors, vendors, or the LDSS themselves. This allows the LDSS to achieve the federal TANF performance measure of 50 percent for WPR. DHS will continue to deploy an "employment first" model, but with TANF's new mandated partnership in the WIOA system, DHS can leverage the myriad of opportunities that the WIOA Partners will offer to improve upon the employment and training trajectories of TANF recipients in Maryland.

Over the first four years of the WIOA Combined Plan, DHS has integrated TANF into the WIOA system as a full partner, thus increasing meaningful access to WIOA services for TANF work eligible individuals (WEI) who are determined to be ready, supported, and eligible.

A few WIOA Priority of Service populations, within the WEI TANF group, may include: work ready TANF recipients; TANF recipients between the ages of 18–24 who may be able to take advantage of the new focus on older, out–of–school youth services; individuals receiving or who have exhausted UI and may need TANF; and non–custodial parents. All of these groups fit into Maryland's overall list of targeted populations for Priority of Service. In addition, TANF will be able to offer potential services and supports to other eligible customers within the WIOA system thus providing value to the entire system on the whole.

DHS, with the 24 LDSS and the WIOA Partners, will implement this partnership using a phased–in approach over the four year period of the Plan in all of Maryland's 12 Local Areas. This will allow for strategic and thoughtful roll–out, flexibility based on critical local needs and input, evaluation, and ability to change course as needed.

DHS leaders continue to serve on the WIOA Alignment Group to ensure an ongoing active TANF voice. Further, the WIOA Partners in the Alignment Group created under this Plan have ensured that high level leaders from the LDSS, and other decision makers from partnering agencies, have adequate representation on Local Boards. This has ensured local TANF representation for alignment, effective operations, compliance, evaluation, and partnership purposes. To assist Maryland with this phased in approach of TANF integration within the WIOA system, DHS, the LDSS, and other WIOA Partners, successfully completed the Health and Human Services Office of Family Assistance (OFA) Systems to Family Stability National Policy Academy (the Academy).

Through leveraging the Academy's resources, tools, and subject matter experts, Maryland will continue to:

- Assess the current status of LDSS and Local Area partnerships;
- Provide direct technical assistance and guidance to the areas selected to phase in first. Areas will be offered a variety of technical assistance options to work towards a meaningful, operational partnership;
- Monitor the progress of the partnership plans and provide ongoing technical assistance; and
- Set up evaluation criteria, to measure the effectiveness of the partnership.

As a general framework, based on a strong individualized assessment, TANF recipients will receive appropriate services through one of three portals: (1) the LDSS only; (2) through a combined effort between the LDSS and WIOA system; or (3) through the WIOA system only. All services delivered to TANF recipients should focus on: (1) meeting the WPR by placing TANF recipients in federally countable work activities for sufficient hours each week and (2) achieving the WIOA performance measures, as applicable. The ultimate goal is for TANF recipients to achieve employment that leads to long–term independence from public assistance. Throughout participation in these activities, the LDSS will provide supportive services that may include: child care, medical assistance, transportation, food assistance, emergency assistance, clothing assistance, and employment retention services.

Through the WIOA system, TANF recipients may:

- Receive Labor Market Information, recruitment, job development, and placement services through WIOA, in partnership with LDSS business services staff;
- Participate in training programs such as short term credentialing training programs, work based learning programs, on–the–job training programs, MD Labor's EARN industry–led training programs, Career Pathways training programs, and/or apprenticeships; and/or
- Participate in Adult Basic Education (ABE), Adult Secondary Education (ASE), or English Language Acquisition (ELA).

In order to achieve this partnership, DHS will continue to:

- Consider co–location of LDSS and/or WIOA Partners at AJCs or LDSS, depending on the nature of local partnerships and operations to:
    - Monitor the progress of TANF WEI and keep them countable for the federal WPR;
    - Become an integrated part of the WIOA Partners and serve customers collaboratively;
    - Become an integrated member of the WIOA Partners Business Services teams in order to engage with the business community collaboratively and provide the best customer service to businesses and jobseekers alike;
    - Develop common intake and assessment strategies; and
    - Braid and blend funding as appropriate.
- Leverage existing financial and in–kind contributions to the WIOA system:

    - Analyze existing LDSS vendor contracts with the WIOA System and possibly re–tool to create more meaningful access and integration into the WIOA system;
    - Explore partnership models that leverage existing funding to increase TANF recipients' participation in WIOA system programs;
    - Analyze existing co–location contracts or consider co–location of staff or shared space;
    - Provide training and access to DHS' online benefits application and access system, myDHR; and
    - Offer TANF and other LDSS services as needed.
- Contribute outcomes data to the WIOA system:
    - Provide and report on performance data for some of the proposed WIOA Common Measures and
    - Use the data to evaluate the TANF/WIOA partnership.
- Participate in Statewide WIOA Partners activities:
    - Serve on the statewide WIOA Alignment Group;
    - Participate in the planning of Maryland's WIOA Convenings; and
    - Contribute to the Jobseeker Advisory Groups to ensure the inclusion and participation of TANF recipients on the Advisory Groups.

Maryland will leverage DHS' research partner to research, track, and evaluate the TANF partnership with the WIOA system throughout the life of this first WIOA Combined Plan. As Maryland continues to rollout the partnerships regionally and statewide, a research partner will provide the WIOA Partners with data and recommendations of how the partnership are working regarding such components as performance, types of WIOA services for TANF recipients, collaborative policies and procedures, shared funding, administration, alignment of program missions, and cross–program staff training and knowledge.

Whole Family Approach

Following the recommendations of Governor Hogan and Lt. Governor Rutherford, this TANF state plan adopts a Two-Generation approach (2Gen) to serving families. The 2Gen approach intentionally works to build the whole family's well-being through coordinated programs and services both within the Administrations of DHS and throughout the state of Maryland. The 2Gen approach to TANF seeks to support families achieve their goals; help families navigate state and local resources; and promote policies and services that reflect the lived experience and input of customers.

Customer Informed Approach: The success of Maryland's 2Gen approach is driven by the needs of Maryland's families. Families are able to inform decisions at both the State and local level, via a direct link to service providers, policy makers, and funders through a streamlined, electronic feedback loop. The customer service survey is vital to the success of Maryland's 2Gen approach and TANF program as it identifies areas of need, opportunities for improvement, and gaps in services.

Current TANF Workforce Programs

DHS, through the local departments, provides workforce related services and referrals to all applicants or recipients of TANF assistance. The local departments have the responsibility and some flexibility, within state and federal guidelines, to develop the systems, processes, and programs necessary to implement the work requirements of the Act specific to their local jurisdiction.

Annually, the local departments submit their local plans called the Partnership for Achieving Self–Sufficiency (PASS) Plans. These plans describe the activities that local departments will operate to implement the work requirements of the TANF law.

DHS Special Target Populations

Families with disabilities: DHS is committed to strengthening a diverse workforce and connecting TANF customers and their families with disabilities to the supports necessary so that they may fully participate in the state's economy. DHS will enhance staff knowledge and strategies on connecting customers with disabilities with career pathways best suited to a family's specific situation. In doing so, the agency will leverage resources and expertise of WIOA partners including but not limited to the MSDE DORS and MD Labor.

Returning citizens: Maryland sees approximately 10,000 individuals released from prison each year and within three years, 40 percent of those are rearrested. The unemployment rate among those released exceeds 50 percent. While research shows that an employed ex-offender is less likely to commit crimes and return to prison, a criminal record is the greatest barrier to employment, creating a vicious cycle where affected individuals become dependent on criminal activity for living. The State is intentional in providing returning citizens training opportunities, access to expungement services, and career pathways that are accessible to those with criminal records.

Non-Custodial Parents: DHS will maximize the impact the TANF Block Grant has on a family by supporting non-custodial parents (NCP). Non-custodial parents eligible to participate include those with children who receive TANF, SNAP, SSI, Medicaid, and/or Maryland Children's Health Program (MCHP). Expanding the eligible population for workforce and training services with the goal of increasing earnings for NCP's will reduce caseloads and prevent TANF leavers from returning to assistance. Supporting NCP's also means that they will be more equipped to meet child-support obligations- decreasing the likelihood that their children will also become welfare recipients.

LEP: 16 percent of Maryland's population is foreign-born. DHS is committed to TANF programming that is nimble and responsive to the changing needs of the States' diverse population. Maryland will use TANF to address the needs of families with LEP by creating programs that address barriers to the population such as low English language literacy, lack of U.S. work experience, unrecognized education and training credentials, limited professional networks, cultural differences and more.

Substance Abuse: DHS is clear on the impact of the current opioid epidemic. The Department has noticed a shift in caseload demographics such as children residing with relatives as well as an

increased need for supportive services such as mental health and/or substance abuse treatment. DHS will ensure any family impacted by substance abuse has the necessary services needed to be successful in gaining and maintaining employment. Through supportive services, the Department will ensure the necessary referrals are made not only to those experiencing a substance abuse disorder but also those impacted by a family member experiencing addiction. In line with the States' 2Gen approach, families who are impacted by substance abuse will be screened so both somatic and mental health needs are addressed for all impacted members of a family.

Caretaker Relatives

Due to the current drug crisis, DHS has noted a trend of increased cases where grandparents and/or other relatives are caring for minors. These trends are most notable in areas with higher rates of opioid misuse. Presumably, parents are unable or unwilling to care for their children due to a variety of reasons that are directly related to drug abuse such as prolonged absences from home, incarceration, admission to treatment facilities, etc. DHS will intentionally screen caretaker relatives and identify opportunities for enhanced supports that address secondary trauma and an often complex system to navigate.

Youth

In harmony with the Department's 2Gen approach, DHS is committed to providing youth with the resources and opportunities they need to make informed choices that will positively impact their education and career goals. Work-based learning is a proven practice that leads to better employment outcomes as adults. DHS will provide youth opportunities for contextualized learning to better enhance career opportunities as they enter the workforce.

Plan goals include:

- Maintain current TANF Work Program goals:
    - A minimum WPR of 50 percent – This goal is important because WPR is a key benchmark that the federal government uses to evaluate the effectiveness of Maryland's TANF program,
    - Universal Engagement (All TANF recipients must be engaged in a federal or State defined activity unless otherwise exempted), and
    - Job placements at prevailing minimum wage (federal, state, or local) Job placements in $10/hour jobs;
- Improve outcomes for all workforce development vendor contracts;
- Develop meaningful partnerships that advance DHS goals, to include partnership with the WIOA system; and
- Leverage local, state, and federal resources to assist individuals with moving towards self–sufficiency.

The Local PASS Plans also include the state–defined work activity of substance abuse treatment for the purposes of section 402(a)(1)(A)(ii) of the TANF law as well as any additional locally defined work activities that are also incorporated as state defined activities for the purposes of that section of the law. As long as the individual is participating with substance abuse requirements

and is not able to participate in a work activity, the substance abuse treatment is considered the individual's activity for a specified length of time.

In order to monitor and ensure that TANF recipients are engaging in work activities, DHS uses a key tool, the PASS Scorecard (FY 2014 and FY 2015 performance included in the Plan) to obtain a snapshot view of a local departments' performance. The Scorecard posts three critical metrics that indicate the overall levels of performance local departments made in engaging TANF recipients in work activities and moving them into employment. These measures include: the universal WPR, universal engagement, clients placed in employment, and clients placed in full–time employment paying $10 per hour or more.

In addition to workforce development, Maryland's TANF program provides a broad range of other services. The Department's FIA formed partnerships with other administrations within DHS, including the Child Support Enforcement and Social Services divisions, and with other State agencies and community organizations. DHS' FIA works with these partners to promote DHS' goal to protect children by assisting their families to become independent through work, personal and family responsibility, and community involvement.

The Department expanded its goal to include support for low income working families. This new edition to the TANF portion of Maryland's Combined State Plan continues to strengthen those partnerships by empowering staff in offices across the State to work together to provide employment and training activities, supportive services, and benefits that enable customers to get jobs and improve their economic circumstances. Additionally, Maryland is committed to providing targeted services to customers facing multiple barriers to employment, including LEP and disabilities.

This Plan includes a full range of programs targeted at special problems and needy populations in every jurisdiction throughout the State. These programs are:

Core Family Investment Program Components

Eligible individuals may be referred to one or more program components during the application process. The Family Investment Program core components all have the same eligibility criteria mentioned above, unless noted in the component description. They are funded out of TANF, TANF–MOE, or Commingled Funds as appropriate and as reported in Maryland's fiscal reports.

TANF

Individuals may apply for TANF when available resources and referrals do not fully address their families' needs. Applicants must satisfy child support requirements before their applications for TANF are approved. Medical Assistance eligibility is determined in a separate determination and system for each member of an active TANF assistance unit. DHS contracted with two vendors who are qualified to implement TANF/workforce programs for refugees and/or asylees: the International Rescue Committee and the Ethiopian Community Development Center. In order to qualify as a provider for refugee services, vendors must be authorized through the Department of

Homeland Security, Bureau of Citizenship and Immigration Services, and the United States Department of State, Bureau of Population, Refugees and Migration.

Diversion Programs

Maryland operates a diversion program, the Welfare Avoidance Grant (WAG). A local department may offer a WAG according to criteria described in a local plan approved by DHS. A WAG is a one–time only, short–term cash benefit to a family with children, which is paid based on an agreement signed by the applicant or recipient and the local department. Following the intent of §407 of the Social Security Act, WAG is a non–assistance TANF diversion program that provides for a specific family episode of need, rather than a chronic or continuing situation. The WAG provides funding to meet that need so that the breadwinner may take a job or return to a job. A WAG payment is not intended to cover a family's on–going needs. Applicants or recipients may not receive TANF during any period covered by a WAG. An application for TANF is denied during the period covered by the WAG. Any on–going TANF case would be closed. This program provides non– assistance.

Alternative Programs

An alternative program is an optional program, in addition to Family Investment Programs, which may be developed and implemented by a local department to achieve the Family Investment Program goals. The program shall have the approval of the Secretary of DHS, is funded within the local department's allocated funds and any local supplement, and operates within Federal requirements. Local department welfare diversion programs are included in this category.

Emergency Assistance to Families with Children

Maryland's Emergency Assistance to Families with Children program uses TANF funds to operate. Funds are allocated to local departments to meet emergencies for families with children. The financial eligibility criteria for this component differ from the other components, in that the family is needy if they have an emergency situation, as defined in the local plan, and do not have income or readily available liquid assets to meet that emergency. The family must have at least one child under the age of 21, and the emergency cannot have been created by quitting a job.

Transitional Support Services

The Transitional Support Services (TSS) initiative began in July 2019. The purpose of the initiative is to help TANF leavers to smoothly transition to self-sufficiency. Through TSS, a TANF household is able to continue to receive cash assistance for a period of time after their TANF case closes due to income over-scale. DHS will continue to enhance the program to include additional support services (i.e. case management and post-job placement) assistance to ensure that TANF leavers are able to not only maintain employment, but also, they thrive. DHS is currently developing a process to automatically refer TSS recipients to the Supplemental Nutrition Assistance Program Employment and Training to access additional services that will lead to increased household income and improved overall economic wellbeing.

Extended the Allowable Time Period for Vocational Education and Education Program

Beginning July 1, 2020, the State will allow an applicant or a recipient to meet the work activity requirement for a maximum of 24 months by either:

1) Engaging in a minimum of 20 hours per week of vocational education training that is directly related to employment and education that leads to an associate degree, a diploma or a certificate; or
2) Engaging in an average of at least 20 hours per week of education directly related to employment, which may include an adult basic education program, an English as a second language program or a GED program.

Program Requirements

The following section outlines requirement for the state's TANF Program.

Assessment

The application for a Family Investment Program includes an assessment to consider the individual's reasons for applying for, or continuing to rely on, assistance, educational level, job skills and readiness, identifying potential impairments, disabilities, and interests to enable evaluation for appropriate program activities, and any available personal and family resources to facilitate independence. Based on the assessment of needs, the local department offers supportive services to the individual which may include, but are not limited to:

- Child support services;
- Job services;
- Supplemental Nutrition Assistance Program (SNAP / Food Supplement Program);
- Medical Assistance;
- Social services;
- Referral to Family Planning and Early and Periodic Screening, Diagnosis, and Treatment Services;
- Child care;
- Transportation; and
- Other appropriate services.

The applicant signs a Family Responsibility Plan with the local department specifying the requirement to comply with requests for cooperation, participation in work activities, and supportive services which the local department provides. The applicant's actions may include, but are not limited to, participating in child support activities, job search activities, employment activities, community service, and substance abuse treatment programs, if appropriate.

Application Decision

A decision on an application for any Family Investment Program component is made as promptly as possible, no later than 30 calendar days from the date the signed application is received in the local department.

Residence

The applicant and all recipients shall be residents of the state. A resident of the state is one who is living in the state voluntarily, and not for a temporary purpose, and has no immediate intention of moving from the state, and is not receiving assistance from another state.

Citizenship Status

A Family Investment Program recipient must be a U.S. citizen or a qualified alien as defined in §8 USC 1611 et seq., as amended. A state program for other qualified legal immigrants who are not eligible under federal law has been developed and is paid with 100 percent state maintenance of effort (MOE) funds.

Employment and Education Requirements

Each adult in the assistance unit, and each child age 16 years or older in the assistance unit who is not enrolled full–time in school, must participate as requested in a work activity which is approved by the local department and is likely to result in unsubsidized employment. The participation requirement is based on the concept of immediate universal engagement and is compliant with the 24 month work rule found in §402(a)(1) A (ii) of the TANF law.

Exemptions from the work activity requirements are:

- A single custodial parent who is required to care for a child under age one who is a member of the assistance unit (This exemption applies for a cumulative total of 12 months for a parent's lifetime and does not apply to each child);
- A child under age 16;
- A teen parent (either head of household or included as a child on an adult's TANF case) who has not finished secondary school may not be exempt to care for a child younger than one year old;
- A caretaker relative in the assistance unit with a child cared for by a non–parent relative who has demonstrated need, and has no dependent children of his or her own in the assistance unit; and/or,
- An immigrant, parent/caretaker relatives who are not eligible for federal TANF assistance, with the exception of adult only qualified immigrant households for which TANF eligibility is based on an unborn child.

Failure of any non–exempt adult to cooperate in a work requirement without good cause, including failure to accept offered employment, shall result in ineligibility for the entire assistance unit until the household cooperates.

Work Requirements

The state of Maryland provides work–related services and referrals for services to all applicants or recipients of TANF. These referral services are initiated at the local departments. The local departments have the responsibility and limited flexibility, within state and federal guidelines, to develop the systems, processes, and programs necessary to implement the work requirements of the Act specific to their local jurisdiction.

Quitting a Job

When an adult voluntarily quits a job within 30 days of their TANF application date, the entire assistance unit is ineligible for TANF for 30 days after the quit. When a 16–17 year old child applicant who is not enrolled in school voluntarily quits a job within 30 days of the TANF application date, the child is ineligible, and the child's incremental portion of the TANF grant is not paid. To be eligible, the adult or child must work at a new job or wait 30 days after the quit date to apply for TANF. When an adult recipient voluntarily quits a job without good cause, the entire assistance unit is ineligible after conciliation and sanction procedures are applied. When a 16–17 year old child recipient who is not enrolled in school voluntarily quits a job without good cause, that child is ineligible, and the child's incremental portion of the TANF grant is not paid. Work sanctions are imposed on both adults and children over age 16 and must be cured before benefits are paid. Good cause reasons are stated in the Code of Maryland Regulation at 07.03.03.07.

Participation Rates

The state of Maryland elects to take the option to exempt individuals from work requirements and participation rates that are single custodial parents of a child under the age of 12 months. This exemption applies for a cumulative total of 12 months for a parent's lifetime and does not apply to each child.

Child Support Requirements

As an eligibility condition for the Family Investment Program, the caretaker relative must file an application for child support enforcement services at the time of application for the Family Investment Program and assign to the State the right to support for any child included in the Family Assistance Program assistance unit for the period of time the child receives Family Assistance Program assistance. The TANF policy and Maryland regulations were revised to address the Deficit Reduction Act of 2005 changes to child support requirements. The caretaker relative must, unless exempt for good cause, cooperate in the establishment and enforcement of child support for each child in identifying and locating the absent parent of a child for whom assistance is requested, establishing the paternity of a child born out of wedlock for whom assistance is requested, and obtaining support payments or any other payments or property due to the caretaker relative or the child for whom assistance is requested. A determination of non–cooperation without good cause or adequate reason results in ineligibility of the entire assistance unit until the household cooperates.

The Assistance Unit

The assistance unit includes parents or another caretaker relative acting as a parent, a minor child, or a pregnant woman. The degree of relationship for the caretaker other than a parent is not a factor. A minor child is under the age of 18 or expected to complete a program of secondary education or the equivalent level of vocational or technical training before the child turns 19.

To encourage the formation and maintenance of two–parent families, one parent and two–parent assistance units are treated the same and follow the same regulations even though they have different funding sources. When determining the amount of the TANF benefit, the needs of the assistance unit may not include a child age 16 (not head of household) or older who is not a full–time student and who failed to comply with work requirements without good cause. The assistance unit may not include families with an adult head of household or spouse who has received 60 months of benefits under this Act, unless the individual lived in Indian Country as described in §408 of the TANF law or is included in the 20 percent of caseload exception allowable under the TANF law. Nor may it include a teen parent who is not participating in educational activities directed at the attainment of a high school diploma or its equivalent.

The needs of an individual failing to comply with substance abuse treatment requirements are removed from the grant. Also, an individual may not be included in the assistance unit for ten years, if the individual misrepresented a residence in order to receive duplicate benefits. In addition, an individual who is a fugitive felon or parole and probation violator as described in §408 of the TANF law may not be included in the assistance unit. The assistance unit does not include the caretaker relative in families with a child cared for by a non–parent relative who has not demonstrated need and has no dependent children of his or her own in the assistance unit.

The assistance unit cannot include immigrant, parent/caretaker relatives who are not eligible for federal TANF assistance, with the exception of adult only qualified immigrant households for which TANF eligibility is based on an unborn child. Adult only legal immigrant households will be one of the Separate State Program TANF sub–populations. For the federal TANF funded families, a room and board payment is made for the children only. The adults are not included in the assistance unit. Any 100 percent federal TANF funded assistance unit with a dependent 19 year old student in a household that shows a demonstrated need will qualify for separate state funded TANF.

The assistance unit may include married same gender adults and their child(ren). The child(ren) must be related to both parents by birth/blood, marriage, or adoption for both parents to be eligible for TANF. In situations where only one parent in the marriage is related to the child(ren), the assistance unit will be treated as a step-parent case. Maryland also serves families with a parent and/or child who has a disability which will last more than 12 months and who is required to apply for SSI, and the SSI application is approved, pending, or in the appeal stage with 100 percent TANF funds. This program includes services to assist the recipient adult/child apply for and pursue eligibility for SSI benefits.

60–Month Time Limit

Families that reach their 60–month time limit and are granted a hardship exemption remain eligible for TANF. Families that reach their 60–month time limit and are not meeting one or more of the Family Investment Program requirements are not eligible for TANF. Maryland emphasizes that conversations regarding the 60-month time limit start the day of initial application. TANF case managers work with families to identify a family centered plan from day one. The plan ensures that customers are engaged early on in activities that will help them achieve self-sufficiency. Criteria for granting a hardship exemption are stated in the Code of Maryland Regulation at 07.03.03.20. Penalties for not meeting Family Investment Program requirements are stated in Code of Maryland Regulation at 07.03.03.19.

Primary Prevention Initiative

As part of the plan to both reduce infant mortality and encourage children to remain in school, Maryland requires TANF recipients with children, age seven and under to provide medical documentation of annual health checkups. TANF recipients with children age seven and over must verify their children are registered in and attending school at least 80 percent of the time. Children not meeting either the health verification requirement or the school attendance requirement cause a TANF disallowance or reduction in the TANF benefit of $25 per child, per month. When the child is back in compliance, the full benefit is reinstated.

Families Served in a Separate State TANF Program

Because of their special circumstances, the state of Maryland serves the following families in a Separate State TANF Program funded with 100 percent TANF Maintenance of Effort funds. The eligibility requirements are the same as for TANF/TANF–MOE funded families:

- For families where there are qualified immigrant adults (admitted to the country on or after August 22, 1996) who are not eligible under federal law, but meet all other TANF eligibility requirements and include a pregnant adult, but no other children, a separate state program will serve these families until the child is born.
- For families consisting of a parent (or parents) or a non–parent caretaker relative (or non–parent caretaker relatives) with the only child (or children) in the household who is a full time student in a secondary school or an equivalent program and expected to graduate in the year the child turns 19, eligibility ends the month after the month of the child's graduation.
- Adult parents in families that are determined by the local department to be exempt for reason of hardship and who meet all other TANF technical and financial eligibility requirements, who are not eligible under federal law because of the 20 percent hardship exemption limit.

Families Served in a Segregated State TANF Program

Because of their special circumstances, the state of Maryland will serve the following families in a TANF Program funded with state funds segregated within the TANF program. The eligibility requirements are the same as for TANF/TANF–MOE funded families:

- Families with at least one assistance unit member who is employed,
- Has countable earned income, and
- Receives Maryland's 40 percent income disregard.

These families are not subject to the 60–month time limits but are subject to all other TANF requirements.

Because of their special circumstances, the state of Maryland serves the following families in a Segregated TANF Program funded with federal TANF funds. Maryland uses TANF funds to provide adoption services (that do not constitute "assistance") to a needy family in which an unrelated adult is in the process of adopting a child.

To qualify on the basis of income:

- The annual adjusted gross income, as defined by the Internal Revenue Service, of the prospective adoptive family may not exceed 80 percent of the latest published figure for the median income for a family of that size for the state, as set forth in Schedule A under COMAR 07.02.04.11;
- The adoptive child is included in determining the family size; and
- The annual adjusted gross income of the family shall be the latest figure that was reported to the Internal Revenue Service. In this circumstance, Maryland cannot provide income support (i.e., assistance) to the family prior to adoption because the family would not include a child living with a parent or adult relative. Maryland uses segregated Federal TANF funds to pay for the services because the family would not be an "eligible family" for Maintenance of Effort purposes. Funds used for this program are for services and are non–assistance, outside the purview of the IV–E (child welfare) program and meet the first purpose of TANF.

Families Served with State General Funds Not Counted Toward the TANF Maintenance of Effort Requirement

Maryland opts to serve families with two able–bodied parents, including same gender married couples, in the assistance unit in a program with its own funds and will not count these funds toward its TANF Maintenance of Effort requirement. Such families are subject to the work requirements of the TANF program.

Minor Children Who Are Absent From the Home for a Significant Period

States may opt out of paying TANF for a child who has been, or expected by a parent or other caretaker relative to be, absent from the home for a period of 45 consecutive days, or at the option of the state, a period of no less than 30 and not more than 180 consecutive days. The state of Maryland elects the option to continue assistance for a child absent from the home fewer than 180 consecutive days. The state of Maryland elects the option to establish a good cause exception to allow children to exceed this 180 day limit: when the absence is for educational or treatment purposes, approved by the Secretary, the parent does not relinquish responsibility for the child, and the removal of the child from the assistance unit creates a hardship for the child's family.

Unmarried Minor who is a Parent or Pregnant

When TANF is granted for a minor who is an unmarried parent or pregnant, the minor shall reside in the household of the minor's parent, legal guardian, other adult relative, or in a supportive living arrangement in order to receive assistance. The parent, legal guardian, or the adult supervisor in a supportive living arrangement is the authorized representative for the unmarried parent or pregnant minor.

Relative of a Minor Child who is Absent for a Significant Period of Time

Assistance may not be provided for a period of three months, to a parent (or other caretaker relative) of a minor child, who fails to notify the local department of the absence from the home of the minor child, by the end of the 5–day period that begins with the date it becomes clear to the parent that the minor child will be absent longer than 180 days.

Child Care Allowance

A disregard of out of pocket child care payments from earned income may not exceed $200 per month for the care of each child in the assistance unit when the caretaker is employed 100 hours or more, or $100 per child in the assistance unit when the caretaker works less than 100 hours per month.

Income Calculations

The TANF income calculations are stated in the Code of Maryland Regulations at 07.03.13. Eligibility for benefits is measured against a payment standard at 07.03.03.17, which is reviewed each year. These income calculations apply to both members of an assistance unit and non–members whose income is countable to the assistance unit. Each member of the assistance unit is considered to be a recipient of the Family Investment Program, even though no cash assistance is paid. The income countable to TANF from a stepparent is determined by excluding income which falls below 50 percent of the official poverty level established under the Federal Community Services Block Grant, adjusted for family size, and counting as available to the TANF benefit, income which equals or exceeds 50 percent of the poverty level established under the Federal Community Services Block Grant, adjusted for family size.

Benefit Amount

The local department determines the TANF benefit payment amount by deducting the net countable income, rounded down to the nearest dollar, from the allowable amount for the assistance unit size. The period of time covered by the TANF benefit is a calendar month. The assistance unit budget is determined for the length of the eligibility period or until there is a change in circumstances. At the end of the eligibility period, the family's eligibility for assistance is re–determined and the budget is re–calculated. The eligibility period is usually four, six, or 12 months, set by the local department based on the family's circumstances.

Assets

Effective May 1, 2010, the state of Maryland chose to exclude all assets for the financial determination of TANF benefits.

Drug Felonies

In order to receive assistance, individuals convicted of drug kingpin or volume drug dealer felonies must agree to random drug testing and treatment if necessary. Individuals who fail to comply with drug testing or treatment are denied TANF and Food Supplement Program benefits. Individuals convicted of a drug kingpin or volume drug dealer felony after receiving assistance are ineligible for TANF and Food Supplement Program for one year from the date of conviction and are subject to substance abuse testing for a period of two years from the date of:

- Release from incarceration
- Completion of probation
- Completion of parole or mandatory supervision
- Sanctions for Noncompliance with Program Requirements

Failure to Comply with Program Requirements

When an adult does not comply with program requirements, the entire assistance unit becomes ineligible. The Family Investment Program case manager investigates the reasons for noncompliance and helps the individual comply by sending a letter to schedule a conciliation conference and by following up through telephone or personal contact to the extent appropriate and feasible. The first sanction is not imposed less than 30 days from the start of the conciliation process. For noncompliance with any program requirement other than a work activity, TANF is resumed upon compliance with the program requirement. When a 16–17 year old child, who is not enrolled in school, does not comply with a work activity, the child's needs are removed and the child remains a member of the assistance unit. The TANF grant for the family is therefore reduced by the child's incremental portion. For noncompliance with a work activity, TANF is resumed immediately upon compliance in the first instance of noncompliance, after ten days of compliance with the work activity in the second instance or after 30 days of compliance with the work activity in any future instance. States may elect to allow Medical Assistance eligibility to adults who fail to comply with work requirements until compliance is met. For noncompliance with the requirement for prohibited use of an electronic benefits transfer card for federally funded cash assistance programs, **Maryland elects to warn recipients in violation the first time that their EBT card is in danger of being revoked. After a second instance of using the electronic benefits transfer card to access TANF benefits, it will be revoked. Recipients whose electronic benefits transfer cards have been revoked will be required to either provide checking or savings account information for direct deposit of their assistance benefits, or accept a paper check.**

Sanctions for Intentional Program Violations

An individual who has waived the right to an administrative hearing, or was found to have committed an intentional program violation, is ineligible to participate for a period of 12 months after the first finding of fraud or until full repayment of any overpayment of TANF benefits, 24 months after the second finding of fraud or until full repayment of any overpayment of TANF benefits, and permanently after the third finding of fraud. Allegations of potential TANF fraud must be reported by any individual or entity working with the TANF program.

Fraud Under Means–Tested Welfare and Public Assistance Programs

If an individual's benefits under federal, state, or local law relating to a means–tested welfare or a public assistance program are reduced because of an act of fraud by the individual under the law or program, the individual may not, for the duration of the reduction, receive an increased benefit under any other means– tested program.

Other Sanctions

Maryland elects to sanction a family, which fails to ensure that minor dependent school age children attend school, and minor dependent preschool children receive preventive health care. The sanction is a disallowance of $25 per child not meeting the attendance or health care requirement.

Timely Notice of Termination or Reduction

The local department mails or hand delivers advance, written notice at least ten calendar days before the date of reduction, termination, or suspension action.

Local Department Waivers

Any LDSS may submit a request for a waiver of Family Investment Program regulations to the Secretary of DHS. The waiver(s) may be granted for up to two years if the Secretary determines that the waiver:

- Promotes more efficient, effective, and appropriate management and delivery of Family Investment Program services and benefits;
- Improves opportunities for Family Investment Program customers to gain self–sufficiency;
- Provides more flexibility to the LDSS in administering the Family Investment Program; and
- Remains cost neutral for the duration of the waiver.

A waiver that violates federal law or regulations may not be granted to any local department unless prior approval has been received from HHS. The Secretary has the authority to terminate a waiver by written notice to the LDSS 30 days prior to the effective date of the termination.

Demonstration Projects

Demonstration projects are developed through grants to non–profit organizations in partnership with local departments and approved by DHS. The Department may also contract with non–profit organizations including charitable, private, and faith–based organizations, and institutions of post–secondary education to develop demonstration projects. Faith–based organizations may participate in the Family Investment Program demonstration projects on the same basis as any other non–governmental entity. The funds allocated to demonstration projects may not be used to further sectarian religious instruction or worship. An individual may not be required to accept assistance from a faith–based organization if acceptance would violate the individual's bona fide religious beliefs and practices.

All demonstration projects are subject to prescribed outcomes consistent with the Department's mission, goals, and objectives. All demonstration projects must meet specified performance measures as developed by the Department as prescribed by the state's Managing for Results guidelines. The Secretary of DHS will award grants for these demonstration projects through a competitive bid process which includes the issuance of a request for a proposal in accordance with the requirements of the Human Service Article §5–319 Annotated Code of Maryland, and establishment of an evaluation panel to review competing proposals and to recommend to the Secretary of DHS those proposals which have the greatest programmatic and financial merit. Multi–year awards based on program performance may also be considered. The request for demonstration project proposals requires applicants to specify the ways in which the proposed demonstration projects create incentives for increased employment and job retention.

Cooperative Living Project

A Cooperative Living Project will provide its participants on–site child care, communal dining facilities, job readiness programs, and other support services necessary to move participants toward economic self–sufficiency. A Cooperative Living Project may provide its participants living quarters, recreation programs, and individualized case–management. Participants in a Cooperative Living Project are chosen from volunteers eligible for TANF benefits. Participants enter into an agreement with the non–profit organization to attend at least one communal meal per day. While unemployed, participants share in responsibilities for meal preparation, cleaning, and maintaining demonstration project facilities. Participants also assist in providing child care for children of participants in the Cooperative Living Project and work towards achieving economic self–sufficiency.

Formula for Disbursement of Funds

While TANF cash assistance is distributed centrally through an Electronic Benefits Transfer system, the Department allocates funds to local departments for child care, work activities, welfare avoidance, emergency funds, administration, and other services that the Secretary of DHS deems appropriate for the program.

Displaced Workers Grievance Procedure

Maryland has established and maintains grievance procedures to resolve complaints concerning the displacement of workers by an adult in a work activity associated with the Family Investment Program.

Non–Custodial, Non–Supporting Minor Parents

Maryland does not currently provide activities for non–custodial, non–supporting minor parents within its TANF program.

Other options

Maryland does not have Tribal Family Assistance as a category of assistance.

2Gen Innovation Grants

Maryland's 2Gen Innovation Grants provide funding for community-based organizations seeking to implement and test new approaches to coordinating services for families receiving TANF. The grant program will fund proposals for technical assistance, strategic planning, updates to data management, management of information systems, or other approaches that result in simultaneous interventions for both parents and children, reflect 2Gen best practices, and demonstrate a clear effort to remove silos in existing programs or strategies that serve different members of the family.

Programs Funded By Commingled Funds

Maryland has developed a broad array of services for families and children that are reasonably calculated to accomplish the first and second purposes of the TANF law. These are funded out of federal TANF and TANF Maintenance of Effort funds or other sources. Maryland has designed these programs to be as effective and efficient as possible. Using the flexibility in the statute and regulations, Maryland will report the exact amount of federal TANF and/or TANF Maintenance of Effort funds charged to these programs using the appropriate federal mechanisms. Unless otherwise noted, for the purposes of this Plan and federal reporting, eligibility for the following programs is generally limited to those families with incomes under 300 percent of the federal poverty level at the time of service delivery.

Substance Abuse Treatment for Non–Waiver Recipients

Maryland has a IV–E (child welfare) waiver to use federal funds to provide substance abuse treatment services to the parents of children who are at risk of placement or have been placed in foster care and are eligible for IV–E (child welfare) funds. This program is designed to serve those ineligible for the waiver program. This substance abuse and treatment model focuses on intervening with families and breaking the substance abuse and child maltreatment cycle. The program's purpose is to help needy families, who have income within 300 percent of poverty, so children may be cared for in their homes and to end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.

The program provides non–medical intensive case management and supportive services to caretaker relatives whose children are in foster care or at risk for being placed in foster care. One of three treatment options are available—a residential treatment up to 180 days with or without children, a 28–day intermediate care facility, and an intensive outpatient program (90 days to nine months). The program's design is shaped from a social services perspective and requires collaboration with health, drug treatment, education, and other essential service delivery entities. The intent is to provide the services of a gender–specific treatment program. The design: (1) provides drug treatment and support services to substance abusing parents and caretakers; (2) provides drug affected children the treatment and support services to overcome the trauma of physical abuse, sexual abuse, and neglect that can occur as a result of living with a substance abusing caretaker relative; and (3) prevents unnecessary out–of–home placements or reduces the length of stay of children already placed in foster care. A unique program feature is a committed collaboration between state and LDSS, state and local health departments, and the treatment provider. This program provides non–assistance.

Children in Need of Assistance – Drug–Addicted Babies (1997 Md. Laws, Chapter 367)

The purpose of the SB 512 Program is to identify newborns exposed to heroin, cocaine, and crack cocaine; to refer the mothers to drug treatment; and to provide supportive services to the families. Hospitals assess mothers for risk of child abuse and neglect. When deemed high risk, the mother is referred to the LDSS and to drug treatment. If the mother refuses drug treatment or does not successfully complete drug treatment, and if neither the mother nor the father is able to provide adequate care for the child, the LDSS may file a Child In Need of Assistance and begin the process of termination of parental rights. The program serves up to 300 women who deliver newborns exposed or addicted to heroin, cocaine, or crack cocaine in seven jurisdictions statewide. Services are available to both TANF and non–TANF recipients who are within 300 percent of the poverty level. This program does not serve women whose parental rights have been severed. This program provides non–assistance.

DHS/SSA Model Demonstration Program at Tuerk House

DHS has entered into contracts with the Baltimore City Health Department for the purpose of providing substance abuse treatment for Baltimore City parents receiving TANF for themselves and their children with an identified substance abuse problem. Those parents are provided access to seven substance abuse treatment beds at the Tuerk House substance abuse treatment program. Additionally, customers receive continuing treatment as prescribed, parenting classes, and support in the community. The primary objective is to demonstrate that a comprehensive family focused, community based, integrated substance treatment, and support service delivery model reduces and prevents child maltreatment and other problems that jeopardize the health, safety, and independent survival of some families. The program also provides help to needy families, so children may be cared for in their homes in an effort to end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage. Eligibility is limited to families with income below 300 percent of the federal poverty level. This program provides non–assistance.

Post–Entitlement Case Management Services

Services are provided to former TANF customers within 12 months of leaving TANF. Case management services are provided to former TANF families for up to 12 months from the family's last TANF grant. These services are tailored to help the family stay off assistance by providing individualized support and referrals to the family. The purpose is to end dependence of needy parents by promoting job preparation, work, and marriage. Eligibility is limited to families with income within 300 percent of poverty and $5,000 or less in assets. This program provides non–assistance.

Attendant Care Program

The Attendant Care Program allows individuals, in needy families with children, with chronic or permanent physical disabilities, to maintain their independence, and live with their families in their own homes. This includes adults who are currently employed or seeking employment or enrolled in post–secondary or higher education. The program also serves adults who can be discharged from, or avoid placement in, a nursing home or similar institution to live at home with their family on the basis of receiving these benefits. However, Maryland will only claim expenditures made on behalf of eligible families. The program provides financial reimbursement to adults who must rely on the services of attendants for help with bathing, dressing, eating, and transportation, in order for them to seek or maintain employment, participate in an educational or training program, or to prevent an institutional living arrangement. Eligibility is limited to families with income below 300 percent of the federal poverty level. Payment is calculated using a sliding scale based on annual gross income and family size. This program provides non–assistance.

In–Home Aide Services Program (IHAS)

This program assists individuals in needy families with activities of personal care with nursing supervision, chore services, meal planning and preparation, transportation/escort services, respite care, training in self–care, and/or care taking skills (help with children or homemaking tasks). The program also offers family members training in care–giving skills as well as guidance and support in coping with stress associated with caregiving. Another component of the program provides Parent Aides, who intervene to prevent child abuse and neglect by providing hands on service and help with children or homemaking tasks when parents are unable to perform these activities. As a result, the home remains a safe environment for the child and there are more opportunities for the parent to interact with the child. This program serves families under 300 percent of the poverty level. This program provides non–assistance.

Job Skills Enhancement Pilot Program

The Jobs Skills Enhancement Pilot Program is in limited areas and targets newly employed, unskilled, and semiskilled current TANF recipients. Former TANF recipients are also targeted as part of the post–entitlement continuing services package provided to families beyond cash assistance. Participants are provided with training to enhance existing skills, gain additional or alternative skills, or learn interpersonal communication and other related skills to retain their jobs and increase the potential for advancement beyond their entry–level positions. The pilot program is administered by the LDSS or through the state service delivery area system. This program

provides non–assistance. Current TANF recipients are eligible for this program. Former recipients are eligible if they meet the criteria below:

- Former recipients' assets must not exceed $5,000,
- Income cannot exceed 300 percent of the federal poverty level for a comparable family size, and
- One vehicle for each employed family member is excluded.

Job Skills Enhancement for Non–TANF Families Program

The Job Skills Enhancement for Non–TANF Families Program provides comprehensive job skills enhancement services to low–income working families whose employed members' lack of job skills consigns the family to inadequate income and little opportunity for improved earnings in the future. Such families are at risk of welfare dependence. By enhancing the job skills of these wage earners, this program improves participants' incomes and their capacity for long term financial self–sufficiency. The Job Skills Enhancement for Non–TANF Families Program offers comprehensive workforce support services including, but not limited to, child care, transportation, skills training, and more. The program provides non–assistance services and not payments. Close interagency cooperation and extensive involvement of the business community, from whom skill enhancement services are procured, characterize the program.

Participants, all of whom are voluntary, receive a menu of services tailored to meet their individual needs. Recruitment and orientation is followed by an individual assessment to assist program participants in defining skills, aptitudes, and interests. Assessment results are used to identify and develop the participant's Individual Training Plan. The Individual Training Plan identifies the participant's goals, action steps, outcome measures, and specific time frames – not to exceed one year. This jointly developed plan outlines appropriate training and education to meet the state's career objectives. Job skill enhancement activities may include experiential learning and/or formal training.

In addition, the program's multi–agency configuration and its close links with the business community affords participants the opportunity to enroll in on–the–job training, job shadowing, career exploration, business tours, mentoring activities, and more. Information pertaining to job openings, industry projections, labor market analyses, and job skill demand are utilized to assist participants in developing their Individual Training Plan. The program is a diversion program intended to assist Maryland families in avoiding welfare dependency by improving their job skills, and thus, their capacity for achieving long–term financial self–sufficiency.

For program purposes, "family" also includes a pregnant woman or a parent with one or more minor children or a caretaker relative with one or more minor children. Targeted customers are Maryland families whose adult wage earners have been employed for a minimum of six months for not less than 30 hours per week in entry–level and other positions with limited potential for advancement and whose income meets the program's eligibility criteria. Participant families are limited to those with an annual earned income up to 300 percent of the federal poverty guidelines, adjusted for family size and $5,000 or less in assets. The program will also exclude one vehicle for each working person in the family. This program provides non–assistance.

Family Preservation

Family Preservation represents a variety of programs available to families to provide supportive services to promote safety and well–being of children and their families. This includes families with identified stresses around family life, including disruption, child abuse and neglect issues, domestic violence, homelessness, substance abuse, mental health, physical health, and educational concerns, who are within 200 percent of the poverty level. The principal purpose behind these programs is to enable children to continue to live and thrive in their home with their parents or relatives. Each program is child safety based, goal oriented, family focused, flexible, provided in the home or community, culturally relevant and sensitive, and designed to build on family strengths and unity. Manageable caseload sizes and a team approach of social worker and case associate are an integral part of all services. Each service has designated timeframes, with the possibility for limited extensions when service goals have not been realized. Employment and self–sufficiency are program goals and part of the mutually agreed upon family service agreement. This program provides non–assistance.

Individual Development Accounts

Maryland and/or local jurisdictions may elect to fund Individual Development Accounts for families under 300 percent of the poverty level, in accordance with local plans and budgets. Federal funds are not used for Individual Development Accounts. State General Funds or local funds may be used to fund these Individual Development Accounts. These programs provide non–assistance.

The Eviction Assistance Program

To prevent homelessness, this program provides funds to local jurisdictions to hire staff and work with families under 300 percent of the poverty level who are facing imminent eviction. The recipient of a grant must show that the grant will resolve the issue.

The Displaced Homemaker Program

This program provides a continuum of comprehensive services to help individuals, who have income less than 300 percent of the poverty level, enter or re–enter the workforce in order to become self–sufficient. Recipients must be: 35 years or older; experienced a loss of income through separation, divorce, disability, or death; and received assistance through care of a child on TANF and are no longer eligible or have received TANF for 24 or more months. This program provides non–assistance.

The Maryland Emergency Food Program

This program provides cash grants to assist emergency food providers (including soup kitchens and food pantries) in purchasing food for needy families with income under 300 percent of the poverty level. This program provides non–assistance.

Summer Youth Employment Program

The summer youth employment program is designed to provide work subsidies for work placements focused on basic skills enhancement and the opportunity to learn marketable work skills. These summer programs can operate in partnership with WIOA Partners, thus creating robust work experiences for youth. Program counselors help youth develop positive work habits and attitudes and can reinforce the relationship between the skills acquired on the job and what is learned in an educational setting. Transportation for youth to travel to and from the work site may also be provided. Summer youth employment programs reduce the risk of welfare dependency by improving the youths' capacity to obtain employment that leads to long–term financial self–sufficiency. This program serves youth ages 14 through 21 that are members of a family whose total family income is up to 300 percent of the federal poverty level. This program provides non–assistance.

Refugee Employment Programs

Refugee Employment Programs provide employment and supportive services to families who hold a humanitarian immigrant status (refugees, asylees, certified Victims of Trafficking, Cuban-Haitian parolees, Amerasians, and Iraqi and Afghan Special Immigrant Visa holders). Refugee Employment Programs are funded through the federal Administration for Children and Families, Office of Refugee Resettlement. DHS' MORA works through a network of public and private service providers to assist eligible humanitarian immigrants in achieving economic self-sufficiency as soon as possible. Services include, but are not limited to job development, job placement, removal of employment barriers (such as childcare, transportation, LEP, financial literacy, and unfamiliarity with U.S. work culture and customs), case management, and follow-up after job placement. Certain Refugee Employment Programs also provide vocational training that allows participants to attain job upgrades or to return to their previous field of work. Services are available for up to 60 months following the date when an eligible immigration status is received, and there is not an income limit for program participation.

Informal Kinship Care Services

These services are provided to children who live with their relatives through an informal arrangement made within the family. The child is not in the care, custody, or guardianship of the LDSS. Both the child and the relative caregivers receive informal kinship care support services, including information and referral through LDSS and the Kinship Care Resource Center funded by the Department of Human Service and entities such as the Brookdale Foundation. The children's income must be within 300 percent of poverty. This program provides non–assistance.

Post Adoption Services

Post Adoption Services provide supportive services to adoptive parents and children with income under 300 percent of the poverty level. Services provided include, but are not limited to: individual and group support, child or family mentoring, marriage support, information and referral, crisis intervention, community and recreational services, and educational support, such as tutoring and educational plan development. Benefits under this program meet the definition of non–assistance under the TANF program. This program is reasonably calculated to meet the first goal of the TANF statute.

Independent Living Program

The Independent Living Program is a part of a continuum of foster care services administered by the Social Services Administration and delivered by the 24 LDSS. The purposes of the program are to: (1) end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage and (2) prevent and reduce the incidence of out–of–wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies. The program provides a wide range of services designed to enable families to live independently. The goal of the program is to prepare older foster care youth for self–sufficiency by their 18th birthday or upon completion of high school. The youth may remain in foster care up to age 21 if in school, in training, or disabled. Eligibility for this program's services is based on receipt of foster care maintenance payments paid to the kinship care family on behalf of the child and on assessment outcomes. The financial and eligibility criteria for the foster care maintenance payment are in the Code of Maryland Regulations at 07.02.11.26, and the schedules against which payments are measured are at 07.02.11.34. The program provides non–assistance.

Kinship/Foster Care Maintenance Payment

This program serves children who are full time students, under age 19, who are not eligible for Foster Care IV–E (child welfare) funds and who can no longer reside in their home of origin because of abuse or neglect. These children were determined to be a Child in Need of Assistance through the court system, committed to a LDSS, and placed in the home of a relative. The targeted population is relative caregivers of needy children committed to a LDSS and the Child in Need of Assistance children living with that relative who is a licensed foster parent. The purpose of the program is to provide assistance to needy families so children may live with their relatives. Relative caregivers in this program are local department–approved foster parents of the kin child. The children for whom payment is made must have income below 300 percent of the poverty level. The complete financial and eligibility criteria for the foster care maintenance payment are in the Code of Maryland Regulations at 07.02.11.26 and the schedules against which payment is measured are at 07.02.11.34. Foster care maintenance payments are made to the caregiver on behalf of the child. This program provides assistance.

Local Programs Administered by the LDSS

This includes a wide variety of programs that have funds in them coming from a wide variety of sources, such as county and local governments, contributions from churches and other non–profit organizations, and philanthropic entities. Because of the nature and history of the service delivery system in Maryland, many of these groups view their LDSS as the best vehicle to deliver help to low–income families, beyond that available through the principal programs administered by the department. These programs are sometimes stand–alone and at other times supplement some of the programs mentioned elsewhere in this Plan. They provide eligible families with income under 300 percent of the poverty level with the following kinds of services, which are all considered to be non–assistance for TANF purposes:

- Emergency Food Programs;

- Local supplemental funding for welfare to work programs, including funding for additional space, staff, services, etc.;
- Family Counseling;
- Emergency relief services to help families attain safe and affordable housing, which include the provision of emergency shelter, relocation assistance, homeownership counseling, home repairs, utility restoration, or shut–off prevention;
- Information and referral;
- Medical supplies and services, of an emergency nature, that are not covered by medical assistance or for those ineligible for medical assistance (only state funds are used for costs associated with this program);
- Substance Abuse Services;
- Family Support Services, which are primarily community–based preventive activities designed to promote parents' ability to successfully nurture their children; enable families to use other resources and opportunities available in the community; and create supportive networks to enhance the child– rearing abilities of parents;
- Family Preservation Services that help families alleviate crises that might lead to the out–of–home placement of children, maintain the safety of children, support families preparing to reunite, and assist families in obtaining services and other supports necessary to address their needs (they include, but are not limited, to parent skill training and crisis intervention services);
- Transportation to work, training, job interviews or to access other needed services;
- Clothing to replaces that which is lost in an emergency, is needed for work preparation, or which the family cannot afford because of their present circumstances, which includes such disposable items as diapers;
- Domestic Violence programs that offer services to victims of domestic violence and their families (services include, but are not limited to: safe accommodations for a period of less than four months, hotline counseling, advocacy accompaniment and abuser intervention);
- Boys Club/Girls Club support;
- After school programs;
- Screening for local department services; and
- Grants to Food Bank Services.

Assistance to Individuals with Disabilities

Maryland provides assistance to individuals and families with disabilities applying for or receiving TANF. Maryland: (1) ensures equal access to people with disabilities; (2) reasonably modifies policies, practices, and procedures for people with disabilities where necessary; and (3) ensures that methods of administration do not discriminate on the basis of disability. Applicants and recipients are provided special accommodations and auxiliary aids, such as interpreters for the hearing impaired, large type reading materials for visually impaired, and telephone interviews for those customers whose impairment prevents them from coming into the department of social services.

English Language Learners

This program's services provide language and other services needed by families with LEP in applying for or receiving TANF or TANF–MOE funded benefits. Examples of services include, but are not limited to, interpreter services and English Language Acquisition classes. This program serves those with incomes under 300 percent of the federal poverty level and provides non–assistance.

Adoption Assistance

Maryland provides adoption benefits that include a monthly payment and other non–financial services to needy parents of an adopted child who is not eligible for title IV–E (child welfare) adoption assistance. In this instance, the final adoption establishes a parental relationship even if no blood relationship exists. To qualify on the basis of income, the annual adjusted gross income, as defined by the Internal Revenue Service, of the adoptive family may not exceed 80 percent of the latest published figure for the median income for a family of that size for the state, as set forth in Schedule A under COMAR 07.02.04.11. The adoptive child is included in determining the family size. The annual adjusted gross income of the family shall be the latest figure that was reported to the Internal Revenue Service. This program provides assistance.

Electric Universal Service Program

The Electric Universal Service Program is an affordable electric service program authorized under the Electric Customer Competition and Choice Act of 1999 to help low–income, needy families afford electric service in the deregulated environment and to have safe and reliable electric service. The program provides a one–time–only payment that targets the elderly, working poor, disabled, and families with children. Eligibility is limited to families with income up to 175 percent of the federal poverty guidelines. The program provides non–assistance.

Refundable Earned Income Tax Credit Refunds

The Earned Income Tax Credit Refund Program provides a state paid earned income credit that is refundable to eligible low–income taxpayers with one or more dependents. "Eligible low income taxpayer" means an individual, or an individual and individual's spouse if taxes are filed jointly, whose federal adjusted gross income does not exceed the applicable poverty income level and has applied for these benefits. The "applicable poverty income level" is defined as the amount specified in the poverty income standard that corresponds to the number of exemptions to which the taxpayer is entitled to claim. Poverty income standard means the most recent poverty income guidelines published by HHS, as of July 1 in the taxable year. The EIC can be claimed against state and local income tax. In addition, EIC Support Services include, but are not limited to, Volunteer Tax Preparation, Public Awareness Campaigns, and a 24–Hour Hotline. The purpose is to increase the income levels in low–income families and end dependence of low–income, needy parents on government benefits by promoting job preparation, work, and marriage. This program provides non– assistance.

Transportation Assistance Program

The Transportation Assistance Program (TAP) empowers TANF families with financial challenges to achieve economic self-sufficiency and personal independence through car ownership. This program affords customers the ability to purchase a used Maryland state-inspected vehicle at or below the vehicle's market value through Vehicles for Change (VFC), a vendor that serves all of Maryland. FIA anticipates providing vehicles to 100-120 families per year at an estimated cost to FIA of $4,000 per car. Each customer receiving a vehicle is responsible for paying a flat fee of $800 (the customer's portion of the vehicle's cost). The customer may pay part of the fee or the entire portion at the time of vehicle selection. In order to be eligible for TAP, VFC applicants:

- Must be currently receiving TANF (or if no longer on TANF, must have been a TANF recipient within the last 12 months), a youth aging out of foster care age 18-21, a current TANF-connected non-custodial parent, or a non-custodial parent connected to a TANF case that has closed within the last 12 months;
- Must be employed or have a verified job offer working an average of 30 hours per week or greater;
- Must have a valid Maryland Driver's License;
- Does not have access to any other vehicles in the household; and
- Does not have a driving while intoxicated (DWI) or driving under the influence (DUI) citation on his or her driving record.

Programs Funded By Segregated Federal TANF Funds

Maryland has developed a broad array of services to families and children that are reasonably calculated to accomplish the third and fourth purposes of the TANF law. These programs are not means tested (Maryland has designed these programs to be as effective and efficient as possible. This has the effect that certain specific services and/or beneficiaries of some of the services of some of these programs may not be eligible for federal TANF or MOE. Maryland will determine the exact amount using the appropriate federal mechanisms outlined it its Cost Allocation Plan.). These programs provide non–assistance.

Adolescent Pregnancy Prevention

The Governor's Office for Children provides funding for initiatives and/or training throughout the state that focus on teen pregnancy prevention and/or intervention. The program's main goal is to prevent adolescent pregnancies, which will subsequently prevent and reduce the incidence of out–of–wedlock births. The program includes initiatives that provide parenting skills and promote responsible fatherhood. The program serves pre–adolescents, teenagers, parents, educators, and counselors, according to specific program criteria. This program provides non–assistance.

Maryland's Tomorrow

Maryland's Tomorrow is a statewide dropout prevention program operating in 70 high schools across the state (all jurisdictions are covered) and 23 middle schools in nine jurisdictions. The purposes of the program are to: (1) prevent and reduce out–of–wedlock pregnancies and improve the self–esteem, attendance, school performance, promotion rate, and behavior of at–risk students

in grades six through 12 and (2) to motivate them to succeed in high school, make wise career choices, and continue their education and training. Case managers visit elementary schools and identify students who meet at least one of the following criteria (there is no monetary criteria):

- Low achievement on standardized tests,
- Prior grade retention,
- Poor attendance, or
- A GPA of less than 2.0.

Programs are arranged during the summer between fifth and sixth grade. This approach is also used for eighth graders who are going into high school. Local school systems can choose different approaches. Services can include after school tutoring and computer assisted instruction, daily help with homework, student–operated businesses, jobs in the school community, weekly service learning, wellness activities, rewards, and incentives. Activities may involve families, businesses, and communities. This program provides non–assistance.

Home Visiting

This program provides home visitation and on–site services to families, such as parenting education, family planning, and employment services. The program's main goal is to reduce subsequent out–of–wedlock pregnancies among participants through family planning counseling. The program serves clients over age 16 who are expecting their first child. Both parents must be involved in this program, which is also designed to prevent intergenerational welfare dependency. This program provides non–assistance.

Family Support Center Network

Family Support Centers were developed to establish preventive supports for families during the early formative years and to encourage the formation and maintenance of two–parent families. The Family Support Centers are community–based programs that provide services to assist mothers and/or fathers with children ages birth to three, particularly those in high–risk communities, raise healthy children, and build productive futures. Comprehensive services are provided either on–site or through referral, and existing programs coordinate to benefit mothers and/or fathers and their children and develop new resources to satisfy unmet needs. Services include parenting skills, outreach, peer support and recreational activities, infant and child stimulation, employability and literacy opportunities, health education, and referral for services. This program also includes services developed using this same, successful model. For example, the Family League of Baltimore has also developed a similar set of services based on this Family Support Center Model called "Success by Six," which also includes home visitors, many of whom are former TANF recipients.

There is no income criteria required to participate in the Family Support Center program, although a significant number of participants receive TANF. Others may need cash assistance but choose not to receive TANF. There are also participants who are financially capable of attending to their basic daily life needs but need Family Support Center services to enhance their parenting skills.

The objective is to develop a cadre of services appropriate for each family. This program provides non–assistance.

Collaborative Supervision and Focused Enforcement Initiative

The Collaborative Supervision and Focused Enforcement initiative is a statewide crime reduction strategy that promotes locally based, comprehensive planning in high–crime at–risk neighborhoods for youth and adults. The program is based on strategies implemented by neighborhoods and nonprofit advocacy groups that are successful in collaborating and engaging key community leaders in solving problems in the community. The program aims to develop locally based strategies to respond to the problems that interact at the neighborhood level and bring the justice system to the community, as opposed to bringing the community to the justice system. Many of the strategies include an after school program. These strategies are designed to enhance the motivation, performance, and self–esteem of youth and are thus reasonably calculated to achieve the third goal of the TANF law, the reduction of out of wedlock pregnancies.

The overall goal for the initiative is a 25 to 35 percent reduction in serious crime and quality–of–life improvements in communities that implement the comprehensive strategy. Each participating community surveys residents to measure whether there are improvements in the quality of life and changes in their sense of hopefulness and ability to make a difference. The program seeks to involve youth, as much as possible, in all phases of planning and implementation. This program provides non–assistance.

Project Retain

This project supports welfare reform efforts in Maryland by assisting former and current TANF customers. Project Retain supports welfare reform and workforce development efforts in Maryland in two ways. First, the project enhances staff capacity in local departments by providing skills training on post–employment retention and advancement strategies to avoid high welfare recidivism rates for employed former and current customers. High–performance customer service also requires staff to learn about the career path for higher paying jobs and employers. Secondly, Project Retain assists employed customers with solving problems, removing barriers, or resolving issues that place them at risk of termination or self–termination from employment. Project Retain services help TANF customers retain employment, work toward job advancement, and achieve and sustain self–sufficiency. These efforts reduce welfare rolls and interrupt the cycle of dependency. Additionally, Project Retain provides training to LDSS to build staff capacity. The training is conducted by internal staff, resulting in cost savings to local departments that would otherwise have to use outside contracts for retention and advancement services. This program provides non–assistance and is reasonably calculated to accomplish TANF purpose number four.

Responsible Choices Projects

Responsible Choices Projects work with middle school age adolescents and high school age teens to promote abstinence. Of note is the Best Friends Program, which enlists peer support. Special efforts are also made to work with first–time teen parents, age 16 and older, in an effort to reduce

the incidence of subsequent non–marital births using the Healthy Families America home visitation model. These programs provide non–assistance.

Maryland Fatherhood/Motherhood Initiative

This initiative builds on Maryland's highly successful individually focused, location specific welfare to work program to serve the non–custodial parents of TANF children eligible either at present or in the past 12 months or who owe a TANF related arrearage to the State. By supplementing existing welfare to work strategies and contracts for this population, this initiative is able to make the best use of limited resources to achieve, among other things, employment of the non–custodial parent, payment of child support, decreased recidivism if previously incarcerated, and engagement in the Department's other Healthy Marriage/Healthy Families initiatives. This program provides non–assistance.

The Offender Workforce Transition Initiative

The Offender Workforce Transition Initiative prepares and supports inmates' efforts to re–integrate into the community, become productive wage earners, and lead personally satisfying and fulfilling lives. Collaboration with various federal, state, local, business, and community partners ensures that soon to be released inmates have the necessary career training, work habits, teamwork, conflict resolution skills, and interview techniques that will enable them to land and keep good jobs with a self–sustaining salary. Workforce development professionals and career development facilitators work with individuals on financial literacy and communication strategies. They support efforts to reunify family members and encourage custodial and non–custodial parents to be "responsible" parents. Staff works with recommended offenders until job placement occurs and continues with post–employment follow–up. The goal is to encourage the ex–offenders' adjustment to living and working in a non–restrictive environment and to be competitively employed in an economically viable career pathway. The initiative reduces inmate recidivism and supports the formulation and maintenance of two–parent families. This program provides non–assistance.

Block Grant Programs

Maryland provides an extensive array of services to families and children under its Social Services Block Grant, Community Action Block Grant, Title IV–B State Plan, the Child and Maternal Health Block Grant, and the Substance Abuse and Mental Health Block Grant plans that are reasonably calculated to accomplish the third and fourth purposes of TANF. To the extent that the state expends state or local funds on these services that exceed available block grant funds, the state reserves the option to use TANF funds or TANF–MOE as appropriate and reported in the state's fiscal reports subject to federal limitations. The funds claimed for these will be for non–assistance.

Maryland Higher Education Commission Scholarship Programs

These scholarships are eligible for TANF funding because post–secondary educational attainment by state residents decreases the incidence of out–of–wedlock births by raising the "opportunity

cost" of having children outside of marriage. Studies also show that professional careers (often the product of higher education) delay fertility. These programs provide non–assistance.

Programs Funded By Commingled Funds

Maryland has developed a broad array of services for families and children that are reasonably calculated to accomplish the third and fourth purposes of the TANF law. The changes brought by the Deficit Reduction Act of 2005 allow these programs to be funded with federal TANF dollars or count toward the state's MOE requirement. Maryland has designed these programs to be as effective and efficient as possible. This has the effect that certain specific services and/or beneficiaries of some of the services of some of these programs may not be eligible for federal TANF or MOE. Maryland will determine the exact amount using the appropriate federal mechanisms outlined it its Cost Allocation Plan. These programs provide non–assistance.

Means Tested Programs

Child First Authority Extended School Day Programs

This program provides extended school day activities from 3–6 p.m. to 1,100 children of low income families in ten Baltimore City public elementary/middle schools – 98 percent of the schools' student population is eligible for free or reduced lunch. The eligibility standard is 300 percent of the federal poverty level. Teachers and/or school principals in participating schools can refer a child to Child First Authority if the child is determined to be at risk of poor school performance and/or attendance. All parents of participating children must actively participate in nine hours of Child First Authority sponsored training or activities each school year.

The extended school day enriches children's lives and enables parents to work or attend school. Child First Authority programs focus on safety, self–esteem, motivation, performance, character development, and educational enrichment. Child First Authority programs provide additional educational experiences by conducting sessions in art, music, dance, history, reading, writing, and math. Many of the participating schools do not have "arts" activities as a part of their curriculum. The Annenberg Institute chose Child First Authority as one of nine successful initiatives nationally for School Reform. Child First Authority partners include the Maryland Historical Society, Maryland Institute of Art, numerous faith organizations, and parent volunteers. The purpose of the program is to enhance the motivation, performance, and self–esteem of youth and is thus reasonably calculated to achieve the third goal of the TANF law, the reduction of out of wedlock pregnancies. This program is not in any way a component of Maryland's system of free public schools. This program provides non–assistance.

Substance Abuse Treatment and Services Program

The Welfare Innovation Act of 2000 and HB 1024 of the 2005 Session of the Maryland General Assembly required the hiring and placement of addictions specialists in LDSS to conduct screening, testing, assessments, referrals, and reporting for TANF adults and minor parents, and certain Food Supplement Program applicants and recipients (custodial and non–custodial parents who are convicted drug felons). The program requirements and possible sanctions for TANF adults

and minor parents are mentioned above as part of the Family Investment Program Core Components. This program provides non–assistance to TANF eligible individuals and certain Food Supplement Program applicants and recipients whose income is less than 130 percent of the Federal Poverty Level.

After School Programs

The basic after school program is available statewide for school age children in families at or below 300 percent of poverty. This also includes local programs that provide the same or similar services. Vendors chosen to operate within the statewide program must incorporate features that will have a positive measurable impact on one or more of the conditions of well–being for children and youth identified by a report of Maryland results and indicators of child wellbeing. One of the results and indicators is "Babies Born Healthy," which includes a measure for "the rate of births to adolescents less than 18 years of age." Another is "Stable and Economically Self–Sufficient Families," which includes a measure of "the percent of single parent households."

Additionally, local providers offer a variety of after school opportunities to Maryland's youth using their own or combinations of state and local funds. Programs include those housed in local schools that have an academic focus in addition to traditional recreation programs and those based in the community, in a church, recreation center, or similar facility, which stress academics, recreation, and artistic skill development equally as well as programs providing skill development activities around a particular artistic activity. Some pair older youth in a tutoring relationship with younger youth, an experience geared to prepare for the work world. Outcomes sought by these activities include: increased school attendance, increased school achievement, reduction in delinquent behavior, reduction in substance abuse, and reduction in teen pregnancy. Therefore, this program is reasonably calculated to achieve purposes three and four of the TANF statute. This program provides non–assistance.

Howard P. Rawlings Program of Educational Excellence Awards

The State funds two need–based scholarships under this program: (1) the Guaranteed Access Program and (2) the Educational Assistance Grant. The Guaranteed Access Program is open to current high school seniors who will complete a college preparatory program or a student who graduated prior to the current academic year who provides written documentation explaining why they were unable to attend college within one year of graduating from high school. The income scale for the Guaranteed Access Grant program is below and annual updates can be found at: http://www.mhec.maryland.gov/financialAid/ProgramDescriptions/prog_ga.asp.

2020-2030 Guaranteed Access Grant: Family Income Requirements

Family Size	130% of Poverty Level (New)	150% of Poverty Level (Renewal)
1	$15,678	$18,090
2	$21,112	$24,360
3	$26,546	$30,630
4	$31,980	$36,900

Family Size	130% of Poverty Level (New)	150% of Poverty Level (Renewal)
5	$37,414	$43,170
6	$42,848	$49,440
7	$48,282	$55,710
8	$53,716	$61,980
Each additional person	**$5,434**	**$6,270**

The Educational Assistance Grant is open to Maryland residents who are full time undergraduate students. The awards are based on a financial need formula that relies on the Free Application for Federal Student Aid (FAFSA). An Educational Assistance Grant is determined by student need. Need for an Educational Assistance Grant is determined using the following formula:

– College Cost of Attendance
– Expected Family Contribution + or – Regional Cost Of Living Adjustment
– Certain State scholarship awards (if awarded)
– Federal Pell Grant (if eligible)
= Financial Need

Both types of Rawlings scholarships provide non–assistance.

Programs Funded and Administered by Entities Other than the LDSS

This may include a wide variety of programs in receipt of funds from a wide variety of sources, such as county and local governments, contributions from churches and other non–profit organizations, and philanthropic entities. In accordance with Policy Announcement TANF–ACF–PA–2004–01, the State will claim as MOE only those expenditures made under agreements between the State and these third party entities that permit the State to count those expenditures toward its MOE requirement. These programs provide eligible families under 300 percent of the poverty level, with the following kinds of services which are all non–assistance for TANF purposes:

- Emergency Food Programs;
- Local supplemental funding for welfare to work programs, including funding for additional space, staff, services etc.;
- Family Counseling;
- Emergency relief services to help families attain safe and affordable housing, which include the provision of emergency shelter, relocation assistance, homeownership counseling, home repairs, utility restoration, or shut–off prevention;
- Information and referral;
- Medical supplies and services, of an emergency nature that are not covered by medical assistance or for those ineligible for medical assistance (only state funds are used for costs associated with this program);
- Substance Abuse Services;
- Family Support Services, which are primarily community–based preventive activities designed to: promote parents' ability to successfully nurture their children, enable families

to use other resources and opportunities available in the community, and create supportive networks to enhance the child– rearing abilities of parents;

- Family Preservation Services that help families alleviate crises that might lead to the out–of–home placement of children, maintain the safety of children, support families preparing to reunite, and assist families in obtaining services and other supports necessary to address their needs (they include but are not limited to parent skill training and crisis intervention services);
- Transportation to work, training, job interviews, or to access other needed services;
- Clothing to replace that which was lost in an emergency, is needed for work preparation, or which the family cannot afford because of their present circumstances, which includes such disposable items as diapers;
- Domestic Violence programs that offer services to victims of domestic violence and their families (services include but are not limited to safe accommodations, hotline counseling, advocacy accompaniment, and abuser intervention);
- Boys Club/Girls Club support;
- After school programs;
- Screening for local department services;
- Grants to Food Banks; and
- Food Bank Services.

Non–Means Tested Programs

Responsible Fathers Programs

These programs provide services to custodial and non–custodial fathers such as parenting education, family planning, GED® instruction, job training, employment– search assistance, and self–esteem building. Sites throughout the state serve young fathers, age 16+, who have one or more children. The program's main goal is to reduce subsequent out–of– wedlock pregnancies among participants through family–planning counseling. Program objectives seek to increase parent–child interaction, emotional support, financial responsibility, and the development of two parent families.

These programs also encourage co–parenting for non–custodial fathers. Although participation in the program is voluntary, participants are required to comply with Child Support Enforcement, if not currently doing so. Programs serve fathers who are initially unemployed. Though not a requirement of program enrollment, participant referrals are actively solicited from LDSS' TANF and child support enforcement rolls. This program provides non–assistance.

The Maryland Healthy Marriage / Healthy Families Initiative

This initiative recognizes that children are more likely to thrive in the context of a two–parent family. The Maryland Healthy Marriage / Healthy Families Initiative has been established as the umbrella for several family focused programs. The purpose of the initiative is to build the capacity of participants, so they are prepared for the responsibilities of parenting and marriage, and ultimately to enhance the lives of their children. The family focused programs target mothers, fathers, and youth, providing a continuum of services to strengthen and empower families. The

programs include fatherhood and non–marital birth reduction initiatives and a marriage preparation curriculum.

The Maryland Healthy Marriage / Healthy Families Initiative focuses primarily on expectant and never married parents and fragile families in need of support services. The initiative connects participants with resources, information, and services to strengthen and empower families. Some of the services offered include parenting skills enhancement, educational activities, employment development, job search and support, counseling, and anger management. The services are provided through a network of social service systems, educational systems, and community and faith based organizations. This program provides non–assistance.

The Responsible Fathers, Healthy Marriage and Healthy Families Programs

These programs include activities that are enumerated in sections 403(a)(2)(A)(iii) and 403(a)(2)(C)(ii) of the Social Security Act. States may claim these pro–family expenditures for non–assistance benefits provided to or on behalf of an individual or family as MOE, regardless of financial need or family composition, unless a limitation, restriction or prohibition under 45 CFR 263 Subpart A applies.

There are instances when the following programs that are not means tested serve eligible families. The State will count these expenditures for services received by needy families as TANF–MOE expenditures only when an audit trail can be established that links the non–means tested service to needy families.

One example is when a program supplies an enrollment list and it is matched to the TANF caseload. If the list shows that five percent of families served were needy, then five percent of the non–federal expenditures for that FY may be claimed as TANF–MOE.

The following commingled funded programs will use this or a similar methodology if TANF–MOE expenditures are claimed.

Community Partnerships

These programs are locally defined and based on indicated needs to help families by providing family support through projects such as home visiting, after school programs, and family preservation. The program objectives seek to reduce out–of–wedlock pregnancies, increase parent–child interaction, emotional support, and financial responsibility, and promote the development of two parent families. This program provides non–assistance.

Safe and Stable Families

There are a variety of programs available to families to provide supportive services to promote safety and well–being of children and their families, promote stability and permanency, preserve family unity, and build empowerment, self–sufficiency, and psychosocial well– being. This includes families with identified stresses around family life, including disruption, child abuse and neglect issues, domestic violence, homelessness, substance abuse, mental health, physical health,

and educational concerns. These programs help families by providing: protective services or potential protective services to families, family support through projects such as parenting classes and after school programs, and family preservation, through grants for Interagency Family Preservation Services and through other means as appropriate, such as by counseling families in crisis, referring them to other existing services, and providing a wide range of service to the family to maximize the chances the children grow up in safe, stable, and loving homes. The programs include, but are not limited to, Families Now, Intensive Family Services, Continuing Protective Services, Services to Families with Children, Kinship Care, Parent Aide Services, and those provided through Inter–Agency Agreements such as the Family Recovery Program. These programs prevent or reduce out–of–wedlock pregnancies and encourage the formation and maintenance of two parent families, since the ultimate goal of all of them is to provide a safe home for children in a stable, two–parent environment. These programs provide non–assistance.

Baltimore City Public Schools After-School Program

In an agreement between State and City officials, the Maryland After-School Opportunity Fund Program was expanded for Baltimore City. As required by legislation, vendors chosen to operate the program must incorporate features that "will have a positive measurable impact on one or more of the conditions of well–being for Maryland children and youth identified by the Maryland Partnership for Children, Youth and Families." The Maryland Partnership for Children, Youth and Families has developed results and indicators of child wellbeing with assistance from the U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation.

One of the results and indicators is "Babies Born Healthy," which includes a measure for "the rate of births to adolescents less than 18 years of age." The programs support the Baltimore City Public Schools' efforts to provide quality after school experiences for at risk students enrolled in the City's public schools. Programs are designed to help children succeed in school, increase positive and healthy behaviors, and decrease negative behaviors such as juvenile crime, substance abuse, and teen pregnancy. This program provides supervision and activities for children of many low–income families and is reasonably calculated to achieve the third goal of the TANF statute. This program provides non–assistance.

Juvenile Delinquency Prevention and Diversion Initiative

This initiative provides community based, multi–service prevention programs serving youth and families. Sites are incorporated non–profits with a Board of Directors, local governments, or state government. The youth served are those at risk of becoming delinquent because of their behaviors and circumstances and youth who committed minor delinquencies. Referrals are accepted from schools, parents, the Department of Juvenile Justice, police, the juvenile him or herself, other agencies, and friends. The purpose of the program is to enhance the motivation, performance, and self–esteem of youth and is, thus, reasonably calculated to achieve the third goal of the TANF law, the reduction of out of wedlock pregnancies. This program provides non– assistance.

Enhancement Grants for Local School Systems

These grants help local school systems provide full day, all year, early childcare and educational programs. Funds can be used to: provide before and after care services for public schools, preschools, pre–kindergarten, or kindergarten programs; increase the number of child care programs that are open full day and year round; expand services to half day programs; and provide family support programs promoting parental involvement. This program provides education and supervision for children of eligible families under 300 percent of the poverty level and promotes parental involvement in their children's learning. The program is reasonably calculated to achieve the first and second goals of the TANF statute. The program provides non–assistance.

Maryland will apply the following methodology for any MOE funds claimed from this program. An enrollment list from the program will be matched to the TANF caseload. If the list shows that X percent of families served were needy, then X percent of the non–federal expenditures for that FY may be claimed as TANF–MOE.

Department of Juvenile Services Programs that are TANF or TANF–MOE Eligible

Department of Juvenile Services Programs may be TANF or TANF–MOE eligible when serving families and children in the community related to Purpose Four of TANF. Among them are community services programs such as Drug Courts for youth, Functional Family Therapy, and Multi–systemic Therapy. The latter two are evidenced–based, family focused interventions that are designed to improve family interaction and prevent re–arrest. Certain services offered by the Department of Juvenile Services residential facilities also serve families.

Families are encouraged to participate in the treatment programs. One initiative, the After Care Program, offers behavioral health professionals that develop aftercare plans that link youth and their families with appropriate services once they return to the community. Families are encouraged to participate in aftercare planning while youth are in the facilities. These programs provide non–assistance. The Bridge to Excellence Act is an "umbrella" funding mechanism that provides aid to local school districts for a variety of educational enhancements. A number of the funding streams within the Act can be TANF or TANF–MOE eligible, either for enhanced funding for schools in low income areas or for services to specific low–income populations. These programs provide non–assistance.

Child Support Pass-Through Initiative

This initiative began July 2019. All or a portion of child support payments received through DHS's Child Support Administration will be passed through to eligible TANF household's Electronic Benefits Transfer (EBT) card. If the TANF household has one child, up to $100 of the monthly child support payment received will be passed-through to the TANF household. If the TANF household has two or more children, up to $200 of the monthly child support payment received will be passed-through to the TANF household. The amount passed through will be disregarded towards the household's TANF benefit calculation.

Separate State Programs Funded By 100 Percent TANF Maintenance Of Effort

Maryland has developed a broad array of services to families and children that are reasonably calculated to accomplish the first and second purposes of the TANF law. These are means tested and are funded out of 100 percent TANF Maintenance of Effort funds in a Separate State Program or other sources that are not federal TANF or TANF Maintenance of Effort. Maryland has designed these programs to be as effective and efficient as possible. This has the effect that certain specific services and certain specific beneficiaries of some of the services of some of these programs may not be eligible for federal TANF or that Maryland will not find it necessary to claim all of the TANF funds that could be claimed for the program because of its own substantial investment in it.

Using the flexibility in the statute and regulations, Maryland will report the exact amount of state funds for MOE charged to these programs using the appropriate federal mechanisms. Unless otherwise noted, for the purposes of this Plan and federal reporting, eligibility for the following programs is limited to those families with incomes under 300 percent of the federal poverty level in effect at the time of service delivery.

Job Access and Reverse Commute

The goal of the Job Access Reverse Commute (JARC) program is to improve access to transportation services for employment and employment related activities for TANF recipients. Helping individuals successfully transition from welfare to work and reach needed employment support services such as childcare and job training activities. JARC addresses the unique transportation challenges faced by TANF recipients seeking to get and maintain employment. TANF recipients of urbanized areas and non-urbanized areas are transported to suburban employment opportunities. With many new entry-level jobs located in suburban areas, TANF recipients have found it difficult to access these jobs from their inner city, urban and rural neighborhoods on a daily basis. Many entry-level jobs require working late at night or on weekends when conventional transit services in many communities are either reduced or non-existent. Finally, many employment-related trips are complex for low-income persons, often involving multiple destinations including reaching childcare facilities and other services as part of the work trip.

Rental Assistance Program to Work

The Rental Assistance Program to Work provides rental assistance to families currently receiving TANF, former TANF families who received TANF in the past year, and families who received a Welfare Avoidance Grant and who are employed or unemployed and in a work activity (as defined by the LDSS). The families receive assistance from the Rental Assistance Program for up to 12 months. Six–month extensions may be granted if customers provide reasonable explanations of why they are not becoming self–sufficient. Eligibility is limited to families who receive income that is 30 percent or less than the statewide or area median income. Rental assistance provides reasonable, stable housing to keep families working, enhance family income, and keep the family off TANF. In addition, rental assistance provides stable, low–cost housing to TANF families preparing for work or working at a low–wage job that will eventually move off TANF. This program provides assistance.

Judith P. Hoyer Early Child Care and Family Education Centers (Judy Centers)

Judy Centers are unique early childhood learning centers that promote school readiness through an integrated approach. The centers, written into Maryland Law in May 2000, envision professional collaboration in integrating a wide spectrum of early childhood education programs and family support services for children from pre–birth to age six. The centers have a "one stop" approach eliminating fragmented services. Children and their families can visit a single location to access community–based organizations providing services such as health services, family support and family literacy, Head Start, and the public library. The community–based services are in addition to the services provided by the Center, such as: early intervention services, health care (immunizations, vision and hearing tests, and pediatric care), professional family support, and student breakfast and lunch. This program encourages eligible families with incomes under 300 percent of poverty to obtain the services they need to ensure their children are healthy and successful in school by making the services easily accessible. The program is reasonably calculated to achieve the first and second purposes of the TANF statute. The program provides non–assistance.

Adoption Benefits Funds

This provides funds for adoption benefits to needy parents of an adopted child who is not eligible for title IV–E adoption assistance. Families are eligible if their annual adjusted gross income, as defined by the Internal Revenue Service, does not exceed 80 percent of the latest published figure for the median income for a family of that size for the state, as set forth in Schedule A under COMAR 07.02.04.11. The adoptive child is included in determining the family size. The annual adjusted gross income of the family shall be the latest figure that was reported to the Internal Revenue Service. Funds are available to pay for benefit payments. The final adoption establishes a parental relationship even if no blood relationship exists. This program is reasonably calculated to meet the first goal of the TANF statute. Benefits under this program meet the definition of assistance under the TANF program.

(b) Require a parent or caretaker receiving assistance to engage in work (defined by the State) once the State determines the parent or caretaker is ready to engage in work, or once he or she has received 24 months of assistance, whichever is earlier, consistent with the child care exception at 407(e)(2) (section 402(a)(1)(A)(ii) of the Social Security Act)

Each adult in the TANF assistance unit and each child age 16 years or older in the assistance unit who is not enrolled full–time in school must participate in a work activity approved by the local department that is likely to result in unsubsidized employment. Local departments follow the 12 approved core and non– core work activities set forth by the law (The participation requirement is based on immediate universal engagement and is compliant with the 24 month work rule found in §402(a)(1) A (ii) of the TANF law.).

Exemptions from the work activity requirements are:

- A single custodial parent who is required to care for a child under age one who is a member of the assistance unit (this exemption applies for a cumulative total of 12 months for a parent's lifetime) and children under age 16.

- A teen parent (either head of household or included as a child on an adult's TANF case) who has not finished secondary school may not be exempt to care for a child younger than one year old.
- A caretaker relative in an assistance unit with a child cared for by a non–parent relative who has demonstrated need and has no dependent children of his or her own in the assistance unit.
- An Immigrant parent or caretaker relative who is not eligible for federal TANF assistance.

Failure of any non–exempt adult to cooperate in a work requirement without good cause, including failure to accept offered employment, shall result in ineligibility of the entire assistance unit until the household cooperates.

(c) Ensure that parents and caretakers receiving assistance engage in work in accordance with section 407 (section 402(a)(1)(A)(iii) of the Social Security Act). Consistent with the required strategic elements discussed in section II (a)(2) herein, provide a specific analysis of how the State's workforce development activities are addressing employment and training services for parents or caretakers receiving assistance.

To ensure that individuals receiving assistance are engaging in work, there is a sanctioning process in place for noncompliance. Refer to Section (a), Sanctions for Noncompliance with Program Requirements. Also Section (a) refers to the TANF Workforce Development Programs description that discusses how LDSS workforce development activities are addressing employment and training services for individuals receiving assistance.

(d) Take such reasonable steps as the State deems necessary to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the Federal Government (section 402(a)(1)(A)(iv) of the Social Security Act)

To restrict the use and disclosure of information, the Secretary of DHS and the Executive Director of the FIA, or their designees, develop partnership agreements for the exchange of information to assist in the verification of cash assistance eligibility. The agreements are in writing and include procedures for requesting, obtaining, and examining the information and specify the Secretary's designee for requesting and receiving information by title or position. Additionally, customers sign a consent form to share information needed for the verification of cash assistance eligibility. The state of Maryland elects the option to collect data on a monthly basis and report on a quarterly basis, a sample of the caseload as prescribed by the Secretary, to produce statistically valid estimates of the performance of the program. Sampling will be used only when the universe is large enough to comply with established sampling methodology.

(e) Establish goals and take action to prevent and reduce out-of-wedlock pregnancies, with special emphasis on teenage pregnancies (section 402(a)(1)(A)(v) of the Social Security Act)

The state of Maryland developed a comprehensive approach to the adolescent pregnancy problem including:

- Improvements in education, such as providing sexuality education, access to contraceptives and other health promotion services to reach out–of–school adolescents;
- Community based programs, such as local multimedia promotion of responsible decision–making on sexual matters;
- Enhanced social services, such as physical and sexual abuse prevention at primary, secondary, and tertiary levels;
- Employment development, such as school–to–work opportunities in partnership with private business and public agencies; and
- Health initiatives, such as improved access to birth control counseling and services for sexually active adolescents and parenting classes for every pregnant teenager and her partner. Programs and services for people in this age group will be improved or added, as needed.

(f) Conduct a program designed to reach State and local law enforcement officials, the education system, and relevant counseling services, that provides education and training on the problem of statutory rape so that teenage pregnancy prevention programs may be expanded to include men (section 402(a)(1)(A)(vi) of the Social Security Act)

The state of Maryland recognizes that effective campaigns to reduce incidences of statutory rape are needed. Both the Maryland Department of Health and the MSDE developed and implemented programs targeted to reducing teen pregnancy. The statewide comprehensive plan includes the following:

- An awareness campaign targeted to reach the male population that is likely to commit these crimes;
- A program of education/training for law enforcement officials;
- A plan that increases awareness through public schools; and
- Enhancement of existing programs that provide counseling to both adolescent females and males. Maryland supports agencies and community groups that serve high risk populations that are in need of abstinence education.

The goal is to prevent unintended pregnancy and sexually transmitted infections (STIs), including HIV/AIDS in youth ages 10–19 who meet the following criteria:

- Live in geographic areas with high teen birth rates;
- Youth in or aging out of foster care or the juvenile justice system;
- Homeless, runaway, or Out–of–School Youth;
- Pregnant or parenting youth; and
- Youth with HIV/AIDS.

As part of the state's campaign to reduce infant mortality, the reduction of teen pregnancy means fewer infants are born who might die before they reach one year old. The goal is to reduce infant mortality by ten percent by the end of calendar year 2017.

(g) Implement policies and procedures as necessary to prevent access to assistance provided under the State program funded under this part through any electronic fund transaction in an automated

teller machine or point-of-sale device located in a place described in section 408(a)(12), including a plan to ensure that recipients of the assistance have adequate access to their cash assistance (section 402(a)(1)(A)(vii) of the Social Security Act)

Maryland's DHS operates an electronic benefits transfer system under agreement with the United States Department of Health and Human Services and pursuant to United States Department of Agriculture regulations. A TANF grant is typically paid via the electronic benefits transfer system. The Middle Class Tax Relief and Job Creation Act of 2012 (P.L. 112–96), provides that individuals and families who are receiving federally funded cash assistance may not use an electronic benefits transfer card for any purpose at a liquor store, adult entertainment venue, or gambling casino.

The state of Maryland provides penalties for non–compliance with program requirements that include the suspension of the use of the cash access portion of the card for specific time periods. Effective October 1, 2014, all TANF applicants and recipients are required to sign an acknowledgement that they understand the prohibition against using their electronic benefits transfer cards at an establishment whose primary purpose is gambling, the sale of liquor, or an adult entertainment venue where individuals or groups disrobe for an audience.

Customers who violate the prohibition against using their cards at unauthorized locations will receive a warning notice that a subsequent violation may result in the use of their electronic benefits transfer cards for cash assistance benefits being suspended. Customers who have twice violated federal law and state policy prohibiting the use of EBT cards at unauthorized locations will no longer have their cash assistance payments put onto their electronic benefits transfer cards. While the cards will still be active for use at Food Supplement Program retailers for those recipients, DHS will deliver cash assistance payments by direct deposit or check. Suspension of the card for cash benefits is for a minimum of one year for the second violation and permanently for a subsequent violation after electronic benefits transfer use has been reinstated.

(h) Ensure that recipients of assistance provided under the State program funded under this part have the ability to use or withdraw assistance with minimal fees or charges, including an opportunity to access assistance with no fee or charges, and are provided information on applicable fees and surcharges that apply to electronic fund transactions involving the assistance, and that such information is made publicly available (section 402(a)(1)(A)(viii) of the Social Security Act)

Individuals and families may incur fees and charges when withdrawing funds from ATMs that are not in the state vendor's network. DHS will provide customers with recommendations on how to access funds in a way that minimizes ATM fees or additional surcharges, such as using ATMs that do not charge a usage fee or using the ATMs from the state vendor who manages the electronic benefits transfer funds accounts. DHS will continue to explore additional methods of reducing fees for customers and provide them with notifications via the DHS, website where a link to the information will be available. In addition, information will be provided in the LDSS. If families or individuals are unable to access TANF benefits due to card restrictions, DHS will advise them of other payment options available including mailing a paper check or direct deposit into the customer's checking or savings account.

(i) Indicate whether it intends to treat families moving from another State differently from other families under the program, and if so how (section 402(a)(1)(B)(i) of the Social Security Act)

Families moving into Maryland from another state will be treated no differently than any other family residing in Maryland. The number of months of TANF used by residents of another state who move to Maryland will be counted in the number of months of TANF received.

(j) Indicate whether it intends to provide assistance to non-citizens, and if so include an overview of the assistance (section 402(a)(1)(B)(ii) of the Social Security Act)

DHS' Citizenship Status policy for the Family Investment Program states that a Family Investment Program recipient must be a United States citizen or a qualified alien as defined in §8 USC 1611, et seq., as amended. Qualified immigrants, including humanitarian entrants such as refugees, certified Victims of trafficking, Cuban and Haitian parolees, and asylees, who meet the federal technical and financial TANF eligibility requirements, may be referred to one or more of the following Family Investment Program components when applying for assistance:

- Welfare Avoidance Grant,
- TANF,
- Emergency Assistance to Families with Children, and/or
- Disaster Assistance.

Local departments may develop Alternative Programs tailored to fit the unique needs of that jurisdiction. To assist English Language Learners in meeting the TANF work requirements, DHS contracts with, the International Rescue Committee (IRC) which is qualified to implement TANF/workforce programs for humanitarian immigrants.

(k) Set forth objective criteria for the delivery of benefits and the determination of eligibility and for fair and equitable treatment, including an explanation of how it will provide opportunities for recipients who have been adversely affected to be heard in a State administrative or appeal process (section 402(a)(1)(B)(iii) of the Social Security Act)

Refer to Section (a) for a description of Maryland's delivery of benefits and the determination of benefits eligibility. Regarding fair and equitable treatment, Maryland uses a combined application and thus follows the guidelines established by the U.S. Department of Health and Human Services and the U.S. Department of Agriculture. The LDSS, all vendors, and contractors must also follow state and federal non–discrimination requirements. The local departments will provide persons with disabilities individualized treatment and effective and meaningful opportunity to educational or employment activities as they are provided to others. The local department will make reasonable accommodations and provide auxiliary aids for persons with disabilities, such as but not limited to: interpreters, note takers, and materials in alternate formats to the extent that it does not cause a fundamental alteration with the program or result in undue financial or administrative burden.

Appeals and Complaints of Discrimination– A Family Investment Program applicant or recipient may request an agency conference for an explanation of the reasons for proposed actions and present information to show that the proposed action is incorrect. The local department gives each

applicant or recipient written notification of the right to and procedures for requesting and obtaining a hearing as set forth in Code of Maryland Regulations 07.03.03.28 or 07.01.04. An applicant or recipient may file a written complaint by contacting the U.S. Department of Health and Human Services. The complaint must set forth the events and circumstances of alleged discrimination if he or she thinks that DHS or LDSS has discriminated against them. Non–Discrimination Assurances –The state of Maryland assures that the following provisions of law will apply to programs and activities funded under TANF:

- The Age Discrimination Act of 1975 (42 U.S.C. §§ 6101 et seq.;
- Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794);
- The Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12101 et seq.); and
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d et seq.)

The state of Maryland assures that persons with disabilities will be provided with individualized treatment and effective and meaningful opportunity to the extent that it does not cause a fundamental alteration with the program or result in undue financial or administrative burden.

(l) Indicate whether the State intends to assist individuals to train for, seek, and maintain employment (Section 402(a)(1)(B)(v) of the Social Security Act)—

- providing direct care in a long-term care facility (as such terms are defined under section 1397j of this title); or
- in other occupations related to elder care, high-demand occupations, or occupations expected to experience labor shortages as, determined appropriate by the State for which the State identifies an unmet need for service personnel, and, if so, shall include an overview of such assistance.

As a WIOA Partner, DHS is connected with the State's workforce system to stay informed about high–demand occupations. DHS accomplishes this in these ways:

- DHS' Secretary serves on the GWDB. This access to the GWDB provides DHS with knowledge about high–demand occupations, industry sector initiatives, and business workforce development needs.
- DHS' Bureau of Workforce Development has a team member that is tasked with business engagement through DHS' Hiring Agreements program, for both private and public employers. Companies contracted to provide services or goods to the state are required to sign Hiring Agreements which declare DHS as the "first source" in filling positions that may be created as a result of the contract. Further, companies work with DHS to develop specific training to equip eligible TANF customers to fill vacancies. In addition, this team member works closely with the WIOA Partners' statewide business services team, integrating into the larger workforce development system's team that addresses business workforce development needs.
- The local department staff that work with businesses to place TANF customers in employment, internships, or on–the–job training opportunities are also connected to the WIOA Partners' business services teams. This creates a coordinated and integrated system of business engagement. Additionally, the local department staff will begin taking advantage of the quarterly WIOA Partners business services training. Additionally, some

local departments have contracts and Memoranda of Understanding with local community colleges to assist customers with vocational skills training and credentialing programs that will allow them to obtain employment at wages that will support their families. These programs include training in the healthcare related field, such as CNA, GNA, Medical Billing, and Coding. The current demand for skilled workers in these positions is high. These positions will increase in demand as the population of "baby boomers" continues to age. The state will continue to support training for careers in elder care as well as provide job search and job placement assistance for careers in the elder care field.

(m) Provide for all MOE-funded services the following information: the name of the program benefit or service, and the financial eligibility criteria that families must meet in order to receive that benefit or service. In addition, for TANF MOE-funded services (co-mingled or segregated MOE) describe the program benefit provided to eligible families (SSP services do not have to include a description but the Department of Health and Human Services encourages it) (§263.2(b)(3) & §263.2(c) preamble pages 17826-7)

Refer to Section (a) for detailed descriptions of MOE–funded services.

TANF Options Selected

Maryland has opted for the following:

- The option to assist all legal immigrants who lived in the U.S. before August 22, 1996 in the same way U.S. citizens are treated.
- In 2000, the Maryland General Assembly chose to opt out of the PRWORA Section 115 requirement to disqualify custodial parents convicted of a drug–related felony involving possession, use, or distribution of a controlled substance on or after August 22, 1996 from receiving TANF or Food Supplement Program benefits. Mandatory and recurrent drug testing is a condition for receiving TANF and Food Supplement Program benefits for these custodial parents. The department developed regulations in consultation with the Department of Health regarding testing methods and intervals.
- The option to not require an individual who is a single custodial parent caring for a child who has not attained 12 months of age to engage in work.
- The option to disregard the single custodial parent exempt from work due to caring for a child under the age of 12 months in determining the participation rates for work requirements for not more than 12 months.
- The option to terminate assistance to a family where an individual receiving assistance refuses to engage in work requirements, subject to good cause.
- The option to deny assistance to a family where an individual is not cooperating with the establishment of paternity or obtaining child support.
- The option to exempt from the 60 month limitation a family by reason of hardship, not to exceed a total of 20 percent of the average monthly number of families to which assistance is provided.
- The option to continue assistance for a child absent from the home fewer than 180 consecutive days.

- The option to develop a family responsibility plan. The plan sets forth an employment goal and a plan for moving the individual into employment; sets forth the obligations of the individual which may include a requirement to attend school, keep school aged children in school, immunize children, and attend parenting and money management classes; set other requirements which will result in unsubsidized employment; and describe the services the state will provide to assist the individual to attain self–sufficiency.
- The option to comply with the above option within 180 days after the effective date of this part for a recipient of assistance and within 90 days after the effective date of this part after the individual is determined to be eligible for assistance.
- The option to apply a full–family sanction to a family that includes an individual who fails, without good cause, to meet the individual responsibility plan.
- The option to use a sampling method using the procedures the Secretary deems to be necessary to produce statistically valid estimates of the performance of state programs funded under this part.
- The option to sanction a family that fails to ensure that minor dependent school–age children attend school and minor dependent pre–school children get preventive health care.
- The option to screen and identify victims of domestic violence. Refer such individuals to counseling and supportive services. Waive, pursuant to a determination of good cause, other program requirements outlined in Section 402 (a), (7), (A), (I), (ii), and (iii) of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996.
- The option to exempt a family from the 60 month limitation when a family includes an individual who has been battered or subject to extreme cruelty.
- The option to establish good cause reasons for a minor to be absent from the home for longer than 180 consecutive days.
- The option to screen recipients of assistance for use of controlled substances or sanction recipients who test positive for controlled substances.

TANF Options Not Selected At This Time

Maryland has elected to opt out of the following options at this time:

- The option to require a parent or caretaker receiving assistance under the program that, after receiving such assistance for two months is not exempt from work requirements and is not engaged in work, to participate in community service employment.
- The option to sanction a family that includes an adult who is older than 20 and younger than 51 if such adult does not have, or is not working toward attaining, a secondary school diploma or its recognized equivalent unless certain exceptions are met.
- The option to reduce the amount of assistance otherwise payable to a family pro rata with respect to any period during a month in which an individual receiving assistance refuses to comply with work requirements.
- The option to deduct from the assistance that would otherwise be provided to a family of an individual who is not cooperating in the establishment of paternity or obtaining child support 25 percent of the amount of such assistance.
- The option to not use any part of the grant to provide assistance for a minor child who has been, or is expected to be absent from the home for a period of 45 consecutive days.

TANF CERTIFICATIONS

States that include TANF in the Combined State Plan must provide a certification by the chief executive officer of that State, that during the FY, the State will:

1. Operate a child support enforcement program under the State Plan approved under part D. (section 402(a)(2) of the Social Security Act);
2. Operate a foster care and adoption assistance program under the State Plan approved under part E, and that the State will take such actions as are necessary to ensure that children receiving assistance under such part are eligible for medical assistance under the State Plan under title XIX. (section 402(a)(3) of the Social Security Act);
3. Specify which State agency or agencies will administer and supervise the program referred to in paragraph (1) for the FY, which shall include assurances that local governments and private sector organizations (section 402(a)(4) of the Social Security Act)—
   (A) have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and
   (B) have had at least 45 days to submit comments on the plan and the design of such services;
4. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a tribal family assistance plan approved under section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government. (section 402(a)(5) of the Social Security Act);
5. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage. (section 402(a)(6) of the Social Security Act);
6. (optional) Establish and Enforcing standards and procedures to (section 402(a)(7) of the Social Security Act).—
   (i) screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
   (ii) refer such individuals to counseling and supportive services; and
   (iii) waive, pursuant to a determination of good cause, other program requirements such as time limits (for so long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly Penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.

TRADE ADJUSTMENT ASSISTANCE

There are no program-specific state planning requirements for TAA. If the State includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

JOBS FOR VETERANS STATE GRANT (JVSG)

(OMB Control Number: 1225-0086)

The JVSGs are mandatory, formula-based staffing grants to States (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a FY (not PY) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four "rolling quarters") on a PY basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.
In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

(a) How the State intends to provide employment, training and job placement services to veterans and eligible persons under the JVSG;

To meet the training and employment needs of Veterans, MD Labor reports to two USDOL agencies — the Veterans Employment and Training Service (VETS) and the Employment and Training Administration (ETA). In collaboration with VETS, MD Labor administers the JVSG Program, which allows for Veterans with significant barriers to employment (SBE) to receive tailored employment and training services. MD Labor also administers important ETA programs, such as WIOA Title I Adult, Dislocated Worker, and Youth Programs, and Wagner-Peyser Act Employment Services. These programs are universally accessible to all eligible job seekers.

Pursuant to Title 38 of the United State Code and rules and regulations issued by USDOL covered persons as defined in applicable law, receive Priority of Service for all programs or services for workforce preparation, development, or delivery that is directly funded, in whole or in part, by USDOL. Both VETS- and ETA-administered programs are offered through the AJC system. Maryland's AJCs facilitate connections between employers and work-ready Veterans and provide Veterans with comprehensive employment and training services.

Partner agencies interested in leveraging the AJC system to connect Veterans with employment services are encouraged to contact their nearest AJC. Disabled Veterans Outreach Program (DVOP) specialists provide intensive services and facilitate placements to meet the employment needs of Veterans. Pursuant to 38 U.S.C. 4103A, "special disabled Veterans," "other disabled Veterans," and "other eligible Veterans" receive priority in the provision of intensive services in accordance with priorities determined by the USDOL Secretary. In any event, maximum emphasis

must be placed on meeting the employment needs of veterans who are economically or educationally disadvantaged, including homeless Veterans and those with barriers to employment.

Local Veterans' Employment Representatives (LVERs) conduct outreach to local employers to assist Veterans in gaining employment. Outreach activities conducted by LVERs include: conducting seminars for employers, job search workshops, and facilitating access to occupational training and placement services.

The DVOPS and LVER roles have defined, differentiated duties designed to function in a complementary fashion. Both staff positions are dedicated resources for the exclusive purpose of serving Veterans, other eligible covered persons, transitioning service members, their spouses, and, indirectly, employers.

DVOP staff assist eligible veterans and other eligible persons with:

- Finding a job,
- Enrolling in training or applying for educational assistance (credential attainment);
- Connecting to resources/information related to meeting immediate needs such as housing/food/mental health services.

When performing outreach, DVOPs encourage veterans or other covered persons enrolled at a Maryland AJCs to attend an orientation session and register with the MWE. In addition to a wide range of civilian resources, MWE serves as an access point for the Mil2FedJobs portal, which is a virtual resource designed to help transitioning military personnel find jobs for which their service experience and training make them qualified and attractive candidates. The portal uses military occupations to identify matches in public sector industries.

The following efforts have been taken to ensure the strategic development of the JVSG program:

- Local Area directors are charged with staying current on Veteran Priority of Service requirements, and discussing integration strategies with the Veterans Program Manager and the MD Labor OWD Director.
- Local Areas have been encouraged to include Veterans' staff in AJC workgroups and organizational teams. LVERs, whose responsibilities include working with employers on behalf of Veterans, receive integrated Business Services training, and are an integral part of each Local Area's Business Services Team.
- Maryland continues to explore employment and training opportunities previously underutilized by veterans, including apprenticeships and on-the-job training.

(b) The duties assigned to DVOP specialists and LVER staff by the State; specifically implementing DVOP and LVER duties or roles and responsibilities as outlined in 38 U.S.C. § 4103A and 4104. These duties must be consistent with current guidance;

MD Labor recognizes that all AJC staff play a critical role in serving transitioning service members, Veterans, and their families by providing resources to assist and prepare them for meaningful careers. In Maryland, the JVSG program provides funding for three key positions to

ensure program success - Disabled Veterans' Outreach Program (DVOP) specialists, Local Veterans' Employment Representatives (LVERs), and a Veterans Program Manager.

In addition to functionally managing and overseeing the JVSG program, the Veterans Program Manager must also ensure that up-to-date signage, handouts, and webpages are available.

To ensure that DVOP specialists have adequate time to serve those most in need of support, staffers in this role deliver services exclusively to Veterans, spouses of Veterans, and other eligible persons who have Significant Barriers to Employment (SBE).

By limiting DVOP specialists' activities to assisting Veterans and spouses of Veterans with one or more SBEs, DVOPs are able to provide more concentrated, intensive services to those who are most in need. Intensive services designed to mitigate SBEs include: comprehensive and specialized assessments of skill levels and service needs, an individual employment plan to identify the employment goals, objectives and services, group and individual counseling, career planning, and job search assistance. Short-term prevocational services may also be offered, including learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare for unsubsidized employment or training. Referrals to other service providers, such as the VR and Employment (VR&E) Program offered by the Department of Veterans Affairs (VA), job search assistance, and short-term instruction to augment skills development may also be provided.

DVOP specialists are prohibited from completing LVER duties and when not otherwise actively engaged with a full caseload, should complete the following activities, in the following order:

- Review all open case files of Veterans with SBE and perform case management duties and
- Conduct relationship building, outreach, and recruitment activities with other service providers in the Local Area to locate and invite other Veterans with SBE to the AJC.

To ensure that correct Intensive Services are recorded, DVOP specialists must use DVOP Service Codes, which provides a list of applicable Services to be entered into the MWE. DVOP staff must only report Services for activities provided. DVOP staff must record all relevant case notes. The department has issued a policy that lists basic case note guidelines and procedures. The Veterans Program Manager should ensure that staff is properly trained on acceptable case management practices.

LVERs work to develop relationships with business to secure employment opportunities for Veterans. LVERs conduct employer outreach; engage in advocacy efforts; organize and facilitate job fairs, recruitments, and job clubs; and conduct prescreening for hiring executives, local businesses, business associations, business groups, industry partners, and community based organizations. This is done in an effort to increase employment opportunities for Veterans, encourage the hiring of disabled Veterans, and generally assist Veterans to gain and retain employment. LVERs conduct seminars for employers and job clubs for eligible Veterans and spouses who are seeking employment. LVER staff is prohibited from completing DVOP specialists' duties.

However, a LVER may meet with Veteran jobseekers recommended by AJC staff for referral to specific employment opportunities. The goal of these interactions is for the LVER to assess the Veteran's suitability for referral, make connections between Veterans and a particular business, and develop feedback for the AJC system on best or promising practices to maximize successful Veteran employment. LVERs play an important role in the development of Local Area service delivery strategies for Veterans. LVERs and Local Area staff must work together to educate partner staff on the roles of DVOPs and LVERs.

As LVER staff leave state employment these roles will be replaced by a combined DVOP/LVER position. Utilizing this position provides the flexibility to work across both roles to expedite placement of qualified veterans into the business's open positions. The DVOP/LVER can assist veterans with SBE as well as work with businesses to develop a relationship to create job opportunities for veterans being case managed. The relationship and knowledge of both the veteran and business creates a trusted environment for quality referrals. Understanding the skills and abilities required for open positions are not lost in translation between two staff in matching the veteran or determining additional education or certification requirements.

MD Labor has created the DVOP/Wagner-Peyser that can provide services to all veterans, their eligible spouses, as well as non-veteran jobseekers. During a jobseeker's initial visit, the DVOP/WP would be responsible for assessing the veteran jobseeker to determine if they have an SBE. If a veteran identifies as having an SBE, the veteran can receive services from the DVOP/WP staff or referred to a full time DVOP. The position provides AJCs with additional flexibility of staff, while streamlining services to all who enter by having a DVOP/WP on location.

Staff in the LVER/DVOP and DSVOP/WP roles will be required to closely manage their time spent in each role. This will ensure proper charging to proper grants is maintained and not exceeding the intent to have staff that seamlessly navigate their roles to provide the best service.

All staff must support Veteran employment initiatives and programs. Regional LVERs act as supervisors for JVSG staff. As supervisors, they must still perform the functions of a LVER. They will review and may approve additional activities as part of the local Veteran service delivery system. Supervisors must also review roles with JVSG staff and evaluate JVSG staff performance. Annually, LVERs must work with the Veterans Program Manager to create annual training plans for Local Areas. These plans help to ensure that all staff are updated and remain informed on current programs, staff roles, and policies.

(c) The manner in which DVOP specialists and LVER staff are integrated into the State's employment service delivery system or AJC delivery system partner network;

MD Labor recognizes that all Local Area staff, including AJC staff, are responsible for providing services to Veterans and eligible spouses. As JVSG Program staff, DVOP specialists and LVERs exist to supplement and not supplant the duties of the AJC staff. All personnel are responsible for serving Veterans and eligible spouses with applicable programs and services. During a Veteran's initial visit, AJC staff are responsible for assessing the Veteran to determine whether a significant barrier to employment exists. If a Veteran self identifies as having a significant barrier to employment, AJC staff should use an eligibility checklist to document the Veteran's status.

The checklist, which has been provided with policy guidance issued by MD Labor, should be used by AJC staff as a way to lead a conversation concerning potential barriers; staff should not ask the Veterans to complete the form themselves. AJC staff should assess the Veteran for SBEs in a private area to allow the Veteran an opportunity to feel safe about providing sensitive information. After staff conduct an initial assessment and deliver Basic Career Services. Veterans with a significant barrier to employment that require and will benefit from intensive services should be referred to the DVOP upon the Veteran's agreement.

If a DVOP is requested and is unavailable, the self-attestation form should serve as a referral for DVOPs to follow-up. If the Veteran with a significant barrier to employment refuses DVOP services, he or she can be provided with the applicable and available ETA-administered AJC services. LVER staff may not receive referrals and are prohibited from providing these services. If a significant barrier to employment is not identified, then the Veteran should be provided with the applicable and available ETA-administered services. If a Veteran without a significant barrier to employment indicates a preference to work with a Veteran's representative, AJC staff should work with JVSG staff to ensure the Veteran job seeker understands DVOP specialists and LVER staff roles.

Priority of Service must be given to all covered persons. As supervisors, Regional LVERs, with support from Labor Exchange Administrators (LEAs), must ensure that signage and handouts are visible in high-traffic areas of each AJC. Regional LVERs are also encouraged to participate in the military service's Capstone sessions by sending a staff member to Capstone activities, upon the request of a military service commander. The AJC staff member's role, if sent to a Capstone session, is to provide an overview of the services available via the AJC and the overall workforce system. Capstone sessions are offered by the military service to help transitioning service members make adequate preparations for post-military careers before they leave active duty.

During Capstone sessions, service members are assessed by unit commanders on career readiness standards. For each transitioning service member, unit commanders evaluate and document readiness for transition to civilian employment on the DD-2958 Form, "Service Member CRS/Individual Transition Plan (ITP)." When a service member is assessed as not meeting career readiness standards (e.g., if a member does not have an adequate civilian resume), the commander then facilitates a "warm handover" of the service member to an AJC staff member or DVOP for intensive services.

(d) The Incentive Award program implemented using the one percent grant allocation set aside for this purpose, as applicable;

The Governor's Salary Commission Report of January 2014 indicates that non-pay-for-performance bonuses were provided to employees during 2003-2014. Maryland's Department of Budget and Management has instructed the pay-for-performance bonuses should not be budgeted in FY 2015 and FY 2016. There has been no further information to indicate that pay-for-performance bonuses will be budgeted in the out years. However implementation of this program will be pursued again starting in 2018.

(e) The populations of veterans to be served, including any additional populations designated by the Secretary as eligible for services, and any additional populations specifically targeted by the State Workforce Agency for services from AJC delivery system partners (e.g., Native American veterans; veterans in remote rural counties or parishes);

Maryland is dedicated to serving Veterans, and in particular, Veterans with SBEs. The categories for SBEs include:

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

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C. 4211(1) and (3); Special disabled and disabled veterans are those:
  - Who are entitled to compensation (or those who would be entitled to compensation, yet are not receiving it due to the receipt of military retired pay) under laws administered by the Secretary of Veterans' Affairs; or
  - Who was discharged or released from active duty because of a service-connected disability;

- Other eligible veterans as defined under 38 U.S.C. 4211(4); Eligible veteran means a person who:
  - Served on active duty for a period of more than 180 days and was discharged with other than a dishonorable discharge;
  - Was discharged or released from active duty because of a service-connected disability;
  - As a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge; or
  - Was discharged or released from active duty by reason of a sole survivorship discharge

- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a) and (b)), as amended

- A recently-separated service member, as defined in 38 U.S.C. 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;

- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;

- A veteran lacking a high school diploma or equivalent certificate;

- A low-income individual (as defined by WIOA Section 3 (36);

- A veteran between the ages of 18 and 24 years old who possess limited civilian work history;

- A Vietnam-era veteran. Vietnam-era veterans are those for which any part of their active military, naval, or air service was during the Vietnam era (the period beginning February 28, 1961, and ending May 7, 1975, in the case of a veteran who served in the Republic of Vietnam during that period, and the period beginning August 5, 1964, and ending May 7, 1975, in all other cases)

- Eligible Transitioning Service Members, Spouses and Caregivers. In annual appropriations bills since the consolidated Appropriations Act of 2014, Congress authorized JVSG grants to support services described in VPL 07-14 to:
  - Transitioning members of the Armed Forces who have been identified as in need of individualized career services;
  - Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in Military Treatment Facilities (MTFs) or Warrior Transition Units (WTUs); and
  - The spouses or other family caregivers of such wounded, ill, or injured members.

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

The JVSG program, as a WIOA Partner, will also work to improve the quality of services provided to Veterans through the AJC system and looks forward to aligning the program with other WIOA Partner programs outlined above.

(f) How the State implements and monitors the administration of priority of service to covered persons;

In accordance with the Jobs for Veterans Act of 2002 and the Veterans' Benefits, Health Care, and Information Technology Act of 2006, MD LABOR offers covered persons "Priority of Service." The purpose of Priority of Service is to give first consideration for program participation to covered Veterans and eligible spouses who also meet the eligibility criteria of a USDOL training, employment, or placement service in any workforce preparation program.

To receive Veterans Priority of Service for a specific program, a Veteran or eligible spouse must meet the statutory definition of a "covered person" and also must meet any other statutory eligibility requirement applicable to the program. Depending on the type of service or resource being provided, Priority of Service may mean:

- A covered person gains access to services or resources earlier than the non-covered persons,
- A covered person receives services or resources instead of a non-covered person when resources are limited, or
- A covered person is placed at the top of a waiting list for the formation of a training class.

However, it is important to note that while a covered person is placed at the top of a waiting list for the formation of a training class, priority of service applies up to the point at which an individual is both (1) approved for funding and (2) accepted or enrolled in a training class. Priority of service is not intended to allow a Veteran or eligible spouse to "bump" the non-covered person from that training class. Veterans Priority of Service should take precedence before applying WIOA Priority of Service for recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient.

For universal access programs, such as Wagner-Peyser services, covered persons must receive Priority of Service over all other program participants. However, for programs with specific eligibility criteria, such as the WIOA Title I Adult program, covered persons must first meet all statutory eligibility requirements for the program to receive Priority of Service. For programs that target specific populations without statutory mandate, covered persons must receive the highest priority for enrollment, similarly to the Priority of Service applied to universal access programs. State and local program operators must understand that Priority of Service, as defined in this policy, must be followed. As established by statute, state and local operators do not have the discretion to establish further priorities within the overall Priority of Service; this right is reserved for the Secretary of MD Labor only. Local Area Directors must ensure that local WIOA plans incorporate a Veterans Priority of Service policy that is consistent with the requirements of this state-issued policy and the law.

For WIOA Title I programs, Priority of Service is available to any Veteran who has served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as defined by 38 U.S.C. 101(2). Active military service includes full-time federal service in the National Guard or a Reserve unit activated for federal service. Active service, however, does not include full-time duty performed strictly for training purposes (i.e., weekend or annual training), nor does it include full-time active duty performed by National Guard personnel mobilized by state rather than federal authorities.

For instance, a National Guard member mobilized by the state in response to a natural disaster would not be considered in active military service. For Wagner-Peyser and JVSG programs, Priority of Service is available to any Veteran who has served at least 180 days in the active military, naval, or air service, and who was discharged and released under conditions other than dishonorable, as defined by 38 U.S.C. 4211(4)(A). Priority of Service is also available to any "eligible spouse" of a Veteran.

The application of Priority of Service varies by program. Workforce programs that operate or deliver services to the public as a whole, without targeting specific groups, must extend Priority of Service to covered persons over all other program participants. For WIOA Title I programs, and other "core" services delivered through the AJC system, Veterans and eligible spouses receive the first level of priority. Veterans Priority of Service must take precedence before applying WIOA Priority of Service for recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. In such instances, program operators must determine the status of each individual veteran or covered persons and apply priority of service as follows:

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

1. To veterans and eligible spouses (who also are included in the groups given statutory priority for WIOA adult formula funds). This means that veterans and eligible spouses who also are recipients of public assistance, other low-income individuals*, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds.
2. To non-covered persons (individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
3. To veterans and eligible spouses who are not included in WIOA's priority groups.
4. To any other populations identified by the Governor or Local Board for priority.
5. Last, to non-covered persons outside the groups given priority under WIOA.

** Note: When past income is an eligibility determinant for Federal employment or training programs, any amounts received as military pay or allowances by any person who served on active duty, and certain other specified benefits, must be disregarded for the veteran and for other individuals for whom those amounts would normally be applied in making an eligibility determination. Military earnings are not to be included when calculating income for veterans or transitioning service members for this priority.*

The state of Maryland acknowledges that the USDOL's VETS or ETA agencies may conduct annual monitoring of Maryland's employment services for Veterans. Prior to VETS and ETA agency audit, the following information is typically requested for review:

- WIOA State Plan, Local Plans, and policies;
- State policy letters pertaining to use of JVSG funded staff and services to Veteran customers;
- Position descriptions for JVSG Program Staff;
- Fiscal documentation;
- Links to state Veteran service websites operated by the state that are funded wholly or in part by USDOL;
- Training materials utilized at the state or local level pertaining to employment services for Veterans;
- Performance plans, individual performance standards, individual goals or other measures used to evaluate performance of JVSG funded staff; and
- Pertinent ad hoc reports available in respective state.

Materials that may assist with the audit process, including promotional materials, fact sheets, etc. To ensure that policies are being followed and expectations are being met. Local Area directors and AJC administrators should also expect MD LABOR to conduct its own monitoring. Additionally, Regional LVERs will monitor the same audit items to find and fix discrepancies and to assist in the assurance that Maryland is in compliance at all times.

(g) How the State provides or intends to provide and measure, through both the DVOP and AJC delivery system partner staff:

(1) job and job training individualized career services,

All staff must support Veteran employment initiatives and programs through the provision of services and through the recognition of the application of Priority of Service. Integration of the JVSG program into the AJC system ensures that Veterans obtain the employment training services they need. DVOP specialists provide intensive services to eligible Veterans and eligible spouses who face significant barriers to employment and therefore necessitate DVOP services to obtain or maintain employment.

Intensive services include comprehensive and specialized assessments of skill levels and service needs; development of an individual employment plan to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals; group counseling; individual counseling and career planning; and short-term prevocational services that may include development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training.

The state measures the outcomes of these services through the MWE in the form of reports that are developed to measure the specific services for both the DVOP and AJC system.

(2) employment placement services, and

Similarly, JVSG and AJC Staff work together to ensure that Veterans obtain employment placement services. As noted in the state's Workforce Plan, Local Area, and Business Services staff should work closely with DVOPs and LVERs to establish effective linkages to ensure that veterans and their eligible spouses are aware of outreach activities, job fairs, and VA Stand Down events. Business Services staff, such as Business Services Representatives and Business Resource Representatives, should consider LVERs as active team members.

The state measures the outcomes of these services through the MWE in the form of reports that are developed to measure the specific services for both the DVOP and AJC system.

(3) job-driven training and subsequent placement service program for eligible veterans and eligible persons;

OJT is training conducted by an employer that occurs while a participant is engaged in productive work. OJT optimizes the resources available under workforce development initiatives to meet the needs of employers and job seekers. Employers generally pay a reduced OJT wage (generally 40-50 percent of wages) to employ participants, while they train for the job.

RAs are another job-driven training option. RAs are programs that combine work-based learning and classroom training to help successful program completers obtain secure, full-time journeyman positions. MD Labor's Apprenticeship and Training Program offers over 150 active apprenticeship programs.

(h) The hire date along with mandatory training completion dates for all DVOP specialists and LVER staff.

Name	Position	Date Hired	Mandatory Training Completion Date
LeRoy Thomas	Prg Mgr/LVER	7/20/2011	1/20/2013
Mark Pindell	Regional/LVER	9/10/2014	3/10/2016
Norman Smith	DVOP	12/6/2017	6/6/2019
Joseph Salacki	DVOP	5/14/2008	11/14/2009
Tonya Johnson Spratley	DVOP	10/16/2013	4/16/2015
Denise Bice	LVER	3/10/2010	9/10/2011
James Tharpe	DVOP	3/13/2019	9/13/2020
Roslyn Jones	Regional/LVER	12/19/2012	6/19/2014
Howard Mitchell	DVOP / LVER	8/5/2015	2/5/2017
Orion Jones	DVOP	4/12/2006	10/12/2007
John Veney	DVOP / LVER	7/29/2015	1/29/2017
Scott Stevens	DVOP	10/15/2014	4/15/2016
Jorge Cruz	LVER	8/9/2004	2/9/2006
Gregory Ingram	DVOP	10/1/2014	4/1/2016
RLVER Tyrone Finney	Regional/LVER	9/11/2006	3/11/2008
Ira Nichols	DVOP	10/4/2017	4/4/2019
John Z. Walker	DVOP	9/21/2011	3/21/2013
Sharon Egerson	DVOP	12/4/2013	6/4/2015
Vernon Davis	DVOP	10/11/2017	4/11/2019
John Codd	DVOP	10/30/2019	4/30/2021
Todd Kemmerer	Regional/LVER	2/14/2018	8/14/2019
George Hawley	DVOP / LVER	5/27/2015	11/27/2016
Raymond Newby	DVOP	6/20/2018	12/20/2019
Shirley Garner	DVOP	6/5/2019	12/5/2020
Lynette Lynn-Horton	LVER	12/20/2004	6/20/2006
Cordia McArthur	DVOP	7/31/2001	1/31/2003
Timothy Walker	DVOP	6/18/2014	12/18/2015
Anthony Butler Sr.	Regional/LVER	12/18/2019	6/18/2021
Bruce DeLauder	DVOP	9/22/2017	3/22/2019
Teresa Spruill	Regional/LVER	1/16/2019	7/16/2020
James Oberhaus	DVOP	10/2/2019	4/2/2021
Amanda Amegashie	DVOP	9/28/2017	3/28/2019
James Marchinke	DVOP	7/11/2007	1/11/2009
Kevin Madara	DVOP	1/9/2013	7/9/2014

UNEMPLOYMENT INSURANCE

1. Submit an SQSP in the following manner depending on their timing in the SQSP cycle:
A. If a State is in the first year of their 2-year cycle, a complete SQSP package must be submitted. A complete SQSP package will include the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page. One of the key goals for the UI program is to ensure that claimants are able to successfully return to work. As such, the SQSP State Plan Narrative must provide a discussion of the plan coordination with other WIOA Combined Plan programs to ensure a coordinated effort and integrated service delivery.

The Maryland DUI SQSP is included in the following sections, including the Transmittal Letter, Budget Worksheets/Forms, State Plan Narrative, CAPs (including the milestones and the completion date for each milestone), the UI IAP, Organizational Chart, and the SQSP Signature Page.

I. Transmittal Letter

September 3, 2019
Via electronic delivery to Miller.Leo@dol.gov, Pasquale.Karen@dol.gov,

Mr. Leo Miller
Regional Administrator
U.S. Department of Labor, Employment and Training Administration
The Curtis Center, Suite 825 East
170 South Independence Mall West
Philadelphia, PA 19106

RE: Transmittal Letter for Maryland's FY20 SQSP Biennial Submission

Dear Mr. Miller:

Attached is Maryland's State Quality Service Plan (SQSP) Federal Fiscal Year 2020 Biennial report for the Division of Unemployment Insurance. Included in this submittal are the following documents:

The State Narrative Plan for DUI
Maryland's FY20 Integrity Action Plan and also included in the Excel Workbook as a tab
MD FY20 SQSP Forms SF 424, SF 424 (B)
DUI's Organizational Chart
Signature Page

Questions concerning information within this submission may be directed to myself at (410) 767-2483 or Shemel Bowden at (410) 767-2463 or by email shemel.bowden@maryland.gov.

Thank you for your guidance and technical assistance. We look forward to our ongoing partnership forged with your Regional Office and the National USDOL ETA.

Best Regards,

Dayne M. Freeman
Assistant Secretary

cc: Tiffany P. Robinson, Secretary of the Maryland Department of Labor
Karen Pasquale, Chief Division of Workforce Security

The 2020 Maryland Unemployment Insurance SQSP transmittal letter can be found at the following link: http://www.dllr.state.md.us/employment/wioauisqsp.shtml

II. Budget Worksheets/Forms

The 2020 Maryland Unemployment Insurance SQSP budget worksheets/forms can be found at the following link: http://www.dllr.state.md.us/employment/wioauisqsp.shtml

III. State Plan Narrative

Division of Unemployment Insurance
Maryland Biennial State Plan Narrative
SQSP Federal Fiscal Year (FY) 2020
DAYNE M. FREEMAN,
DUI ASSISTANT SECRETARY
1100 N. EUTAW STREET
BALTIMORE, MARYLAND 21201

A. Overview

1. State priorities and the strategic direction the state has adopted to ensure continuous improvement.

Improving State Capacity to Administer and Operate the UI Program Effectively

The Maryland DUI Program is a solid and mature functioning program. In ongoing efforts to administer and operate program effectiveness, much of DUI's focus will continue being devoted to the UI modernization project, Reemployment BEACON. The system, which has steadily been developed to replace the legacy system, is well underway and slated for deployment Q1-2020. With implementation, BEACON will streamline operations, increase data accuracy, facilitate real-time data sharing, eliminate manual labor intensive processes, automate current business processes, and most of all, improve overall customer service to Maryland stakeholders (i.e., employers, job seeker-claimants, and partners). DUI's Program Management Office (PMO) is the backbone of Reemployment BEACON and is ensuring that every program change, functionality and system enhancement is managed and implemented effectively.

Over the biennial period, Maryland DUI is also committed to the following areas to ensure performance improvement: (1) intensive staff development training for effective BEACON utilization, (2) System Connectivity between Workforce and UI to reduce the benefit duration and exhaustion rate, (3) improved reemployment outcomes by educating claimants on work search requirements and making claimants more accountable from the onset of the initial claims process (4) reduction of the improper payment rate through prevention, detection and aggressive recovery efforts, (5) federal compliance and improving program performance to meet and surpass USDOL's acceptable levels of performance, and (5) continuing to provide excellent customer service to stakeholders.

Maryland DUI continues to maintain a healthy trust fund balance of $1,317,545,821.06 as of June 30, 2019. Total contribution deposits are $372,736,254.13 and the total UI benefits paid as of quarter ending June 30, 2019 are $291,127, 372.82.

Trust Fund Solvency
Total Contribution Deposits: $372,736,254.13
Total UI Benefits Paid: $291,127,372.82
Total Fund Balance for June 30, 2019: $1,317,545,821.06

For the fourth consecutive year, the trust fund balance on September 30th of the immediately preceding calendar year exceeded five percent of the total taxable wages in covered employment for the four completed calendar quarters immediately preceding September 30th, triggering application of Maryland's Table A (the lowest rate range) of the Table of Rates in computing the assigned earned rate of contribution for employers. For additional information, see the section within this biennial - Other (e.g., approach to maintaining solvency, requests for technical assistance).

2. Assessment of past performance and expected future performance. Includes, at state discretion, a discussion of external factors that may have performance implications.

Assessment of past performance revealed the following primary factors contributed to overall program operations and performance:

Legacy IT Systems - The Maryland Automated Benefit System (MABS) and Tax system were built in the 1980s and upgraded in the 1990s as separate and distinct mainframe systems. In addition, DUI's third system, Appeals, is incompatible with modern operating systems. As a result, Maryland's IT systems are not integrated. Along with aging technology, programming, navigation and data sharing across platforms became increasingly difficult within the Division.

The Need for New Technology Solutions – With increasing demands for IT to program changes across legacy mainframe systems, the need for new technology solutions became apparently unavoidable. Hence, Maryland DUI began the task of replacing its outdated legacy mainframe (2014) to a fully integrated Benefits, Tax and Appeals System; furthermore, a system designed to be more intuitive, easily navigated, and flexible enough to support changes in laws and/or state policies. To present, countless hours have been spent in developing, programming, testing and

ensuring operational functionality of the upcoming UI system, Reemployment BEACON. Full implementation of the BEACON system will not be deployed until all functionality is completely operational. The anticipated timeframe is currently slated for Q1-2020. In addition, Maryland DUI is upgrading its outdated Interactive Voice Response (IVR) telecommunications system to Voice over Internet Protocol (VoIP) to enhance UI services by phone to claimants (i.e., filing weekly certifications for benefits and obtain essential unemployment information.)

Staffing Challenges - Staffing of critical functions was insufficient due to a loss of key subject matter experts from retirement throughout the Division and employees who transitioned to new employment opportunities within or outside the agency. Maryland has since restructured operational units, recruited and hired additional staff to fill some positions in critical areas, taken the opportunity to cross train staff, and rewrote job duties to allow for flexibility to move staff to the area of greatest need. A viable succession plan is also being developed by Maryland's Tax (Contributions) Operations Team.

Expected Future Performance:

To ensure program integrity, quality service delivery and performance improvement, Maryland DUI will continue to infuse metrics-based management, accountability via data driven performance, staff training and development, core work behavior values, ongoing process review, along with identification and incorporation of best practices in collaboration with USDOL.

Improving Prevention, Detection and Recovery of UI Improper Payments

Maryland was identified by USDOL as a "high-rate/high-impact state" due to an improper payment rate currently at 21.66 percent. Maryland is working to aggressively reduce improper payments to ten percent or less. The following activities have commenced. During May 2019, Maryland DUI participated in a kick-off meeting with the National Association of State Workforce Agency (NASWA) UI Integrity Center team. Thereafter, the Maryland team participated in a series of on-site State Intensive Services from July 23, 2019 to July 26, 2019. Maryland's team of subject matter experts were comprised of staff from the following areas: Administration, Benefit Accuracy Measurement (BAM), Benefit Payment Control (BPC), Policy, Benefits (i.e., Claims and Adjudication), Workforce Development, Reemployment and Trade Unit, Program Integrity, and the Communications and Training Unit. The Maryland team engaged in a series of in-depth, open and honest discussions with NAWA's team of instructional design and behavioral insight specialists. Specific topics discussed included:

- RESEA/ROW Experience
- Life Cycle of a Claim
- BAM Data Review
- BPC Operations
- Staff Development/Training
- Eligibility and Compliance Messaging

The goal of the on-site visit is to ultimately reduce Maryland's improper payment rate, specifically focused on the root cause of work search and benefit year earnings' errors. The on-site visit is to

be followed by draft recommendations for the areas mentioned above. Maryland DUI Administration will then finalize NASWA's recommendation into a Rate Reduction Plan. The full plan will be outlined in Maryland's next SQSP quarterly submission.

In addition to the forthcoming Rate Reduction Plan, Maryland has developed detailed strategies to address improper payments within the Integrity Action Plan, along with the following:

Work Search Actions:
Claimants will be required to search for work via the MWE - Reemployment Exchange (REX) System. MWE is an online tool that serves as DWDAL's official labor exchange system for the State of Maryland and has the capacity to automatically validate weekly work searches performed online. With over 30,000 citizens filing UI claims each week, this is the best methodology to validate weekly work searches in that it is impossible to manage this process manually.

Work Search Policy:
Maryland's current work search policy is being revised to include additional activities conducted through the DWDAL that will count towards work search requirements.

Claimant Messaging:
Clear and targeted messaging to inform and educate claimants on their weekly work search requirements and penalties for failing to adhere to the requirement are being implemented.

Reemployment BEACON Implementation:
The implementation of RE-BEACON will help alleviate many of the root causes of improper payments (e.g., BYE,) unrelated to weekly work search errors.

Suspicious Actor Repository (SAR):
Maryland will continue to utilize the Suspicious Actor Repository (SAR). Participating states upload data related to suspicious activity focusing on identity theft to a centralized database. States are then able to cross-match live claimant data against data submitted by all participating states to identify potential identity related fraud cases.

Prisoner Cross Match – Appriss Services:
Maryland will continue utilizing SBR funds, until liquidated, to maintain DUI's current contract with the vendor, Appriss. Appriss provides cross-match services to Maryland DUI by processing state claim records against nearly 2,500 monitored incarceration sources that comprise approximately 80 percent of all incarcerations in the country. Appriss collects near real-time incarceration data from these sources; performs network analysis to enhance identity verification; and cross references state records on a weekly basis to identify claimants who are likely to have been incarcerated while filing for benefits. The DUI then develops internal reports to further reduce false positives and investigates claimants suspected of filing while incarcerated.

Prisoner Update Processing System (PUPS):
Maryland is still working with the Social Security Administration (SSA) to obtain approval for using their Prisoner Update Processing System (PUPS) to allow Maryland to identify those in prisons and other penal institutions who may have filed UI claims and/or have collected UI benefits

fraudulently with assistance of another. Once Maryland is approved, PUPs will be utilized as a second resource for incarceration data for detection and ultimate recovery of improper payments. PUPs is a free resource for all states.

National and State Directories of New Hires:
Maryland continues to identify improper payments as DUI gets matches from the weekly National Report of New Hires (NDNH) and the State Report of Hires (SROH). Claimants are sent notification of the report of hire from both NDNH and SROH and given the opportunity to dispute the report before any action is taken to create an overpayment or deny benefits. Request for weekly earnings are sent to the employer for any weeks filed from the week in which the first day of work occurred. This process allows for earlier detection of improper payments and ultimate recovery.

*See the Integrity Action Plan Narrative for full details of all integrity efforts.

Improving Program Performance Nationally

Maryland DUI continues to seek guidance and utilize technical assistance provided by USDOL's National and Regional offices. Benefit Accuracy Measurement (BAM) staff is working with the Region to aggressively correct the root causes of improper payments for Maryland, which is also a contributing factor to performance nationally.

The BAM Program plays a major role in identifying errors in the entire claims process and the accuracy of benefit payments. Additionally, the Benefit Timeliness & Quality (BTQ) program identifies the quality of non-monetary determinations (i.e. all issues detected on eligible unemployment claims) and the timeliness of determinations rendered (i.e. the decision must be rendered to the claimant within 21 days from the issue detection date (IDD) and within 14 days when payment is due.

Out of the top three root causes of improper payments nationally (i.e. work search, benefit year earnings and separation errors), work search errors continue to be the primary root cause of improper payments for the State of Maryland. The work search errors rate is currently 65.0 percent in Maryland and is the largest contributing factor to the 21.66 percent improper payment rate.

* See Maryland's FY2020 Integrity Action Plan Narrative which outlines proposed corrective action steps to reduce work search errors.

Additionally, Maryland's BAM and BTQ units are continuing cross training and quarterly rotations to collaboratively identify and correct systemic and programmatic errors found during reviews. While utilizing the UI Benefit Operations State Self-Assessment Tool issued by USDOL and designed to support UI process improvements, it was determined that further staff guidance is needed in the areas of issue detection dates, quality fact-finding, and effective time-management for prompt completion of determination cases. As a result, BTQ recently completed training materials and guides during Q3-2019 to assist staff in improving areas of deficiency. Live training and dissemination of materials commenced during Q4-2019. DUI expects significant improvement in the reduction of errors detected by BAM and the reducing the overall improper payment rate.

WIOA

Maryland DUI in conjunction with DWDAL is actively engaged in the execution of the WIOA signed into law July 22, 2014 and effective July 1, 2015. Under WIOA, the UI program is vital to Workforce and Maryland is connecting UI claimants early from the onset of their claim to a full range of reemployment services offered through Workforce Development's AJC and their MWE online labor exchange system.

Maryland's AJCs are conveniently located throughout the State and are fully equipped with Internet access, computer stations, printers, copy and fax machines, telephones, resource libraries and more. Maryland's customer-driven reemployment-related services are designed to assist all job seekers regardless of their status to quickly return to the labor force. Services include reemployment workshops, labor market information, skills assessments, consultation and career guidance, career exploration and planning, training programs, apprenticeship programs, adult and family literacy programs, resume development, job search strategies, employer recruitments, job matching, job referral and placement assistance, including other supportive services.

Jobseekers and employers can access the MWE - Virtual One Stop (MWE-VOS) System which is an online web-based resource. MWE-VOS can also be accessed within the AJC, from an individual's personal computer, or via mobile application. The mobile app was made available for users to download to their smart phones, tablets and other devices; to search jobs by locations or keywords; to filter job searches and set up job alert notifications announcements. By utilizing MWE-VOS employers can post job announcements, manage job openings, and pre-screen applicants at no cost any time day or night. MWE provides a wealth of comprehensive information that UI claimants can use in their job search efforts, including electronic connection to agencies, programs, services, education, training and much more.

Maryland DUI provides meaningful assistance through daily feedback, on-going instruction, guidance and periodic training to Workforce Development Staff, UI claimants and essential partners pertaining to mandated reemployment programs and other relevant services (i.e., RESEA, ROW, including Trade Adjustment Assistant (TAA), Reemployment Trade Adjustment Assistance (RTAA), Additional Training Benefits (ATB) and Work Sharing).

DUI continues to collaborate with DWDAL to ensure claimants' ongoing eligibility, compliance, and return to work efforts through multiple services which include: registration in the MWE System, required reemployment workshop attendance and completion in the RESEA program or the Maryland State Reemployment Opportunity Workshop referred to as ROW, required weekly work search activity (i.e., at least three work search contacts per week), eligibility reviews, detection of potential issues, fact-finding interviews, and adjudication of issues as required.

In addition, DUI and Workforce have been steadily working to effectuate enhanced service delivery approaches, additional reemployment activities throughout the claims series, universal dissemination of work search requirement information; and prompt response to claimant UI-related questions, concerns and challenges. UI claimants are provided with direct access via DUI inquiry lines to speak directly to a UI representative or subject matter expert to obtain answers to

claims and benefit-related questions or concerns. Maryland DUI anticipates quicker reemployment outcomes as DUI implements these and other viable reemployment solutions, including the integration of the MWE-REX system to the upcoming UI System, Reemployment BEACON, slated for deployment during Q1-2020. The integration of Workforce Development's MWE-REX System to BEACON will provide ongoing real-time feedback electronically between critical programs and platforms pertaining to UI claimants and employers. For further details see the section - Reemployment of UI claimants.

Reemployment of UI Claimants

Maryland DUI's mission is to "Put People Back to Work as Fast and Efficiently as Possible." To support the mission, during 2016 the Division restructured and shifted the overall operational focus from strictly unemployment to reemployment. DUI goals and strategic initiatives were implemented to ensure the ongoing delivery of quality services to stakeholder claimants and employers.

DUI Mission: To Put People Back to Work as Fast and Efficiently as Possible

DUI Goal: Improve the Business Climate
DUI Strategic Objective: Foster a Business-Friendly Environment

DUI Goal: Drive Employment
DUI Strategic Objective: Serve as a Bridge to Reemployment

DUI Goal: Provide Excellent Customer Service
DUI Strategic Objective: Make Timely and Quality Determinations

DUI Goal: Foster Employee Engagement
DUI Strategic Objective: Ensure Accurate Employer Wage and Tax Records

DUI Strategic Objective: Prevent Fraud and Minimize Overpayments

DUI Strategic Objective: Deliver Quality Customer Service and Education to Claimants and Employers

Reemployment programs and services for DUI were realigned and integrated under one newly created unit, the first in the Division's history. Robust reemployment discussions have been initiated and Reemployment Integration meetings conducted in collaboration with Division of Workforce Development (DWDAL) in an effort to break down silo activities, to engage and vocalize concerns, effectuate new strategies, reemployment touchpoints, and activities to impact claimant-jobseekers.

While MWE-VOS serves as a powerful job search engine and resource tool allowing jobseekers /UI claimants access to local, regional, statewide, and national job openings, Maryland Reemployment was awarded additional grant funds to establish an efficient and effective reemployment solution to link/integrate DUI and DWDAL's IT systems, as the existing systems

are not able to provide seamless connectivity for real-time exchange of critical information. Maryland identified and secured an effective reemployment solution, the Reemployment Exchange (REX) Module, developed by Geographic Solutions, Inc.

REX is a powerful integrative UI/Workforce IT tool that provides an extensive host of reemployment services to claimants and employers; all designed to help employers identify skilled job-seekers and facilitate quicker return-to-work results for claimants. The REX Module is comprised of progressive functionality components designed to help boost service delivery efforts and facilitate the ultimate sharing of real-time information between staff and systems. REX will immediately display suitable job openings to claimants that closely match their recent/ past employment, educational background, desired occupation and skill set; automatically create a reemployment roadmap designed to help the claimant obtain employment; display real -time labor market information to help claimants make intelligent decisions; provide claimants real-time access to a comprehensive list of job openings repeatedly upon entering the system; allow claimants to enter job search contact information within the system; send system-generated alert notifications to claimants when they are not meeting work search requirements/established thresholds; monitor and notify claimants as to whether they have an active online resume and virtual recruiter; and allow staff to view claimants' ongoing work search status.

The REX integration project involves two phases. The Maryland Reemployment team spearheaded Phase 1 of this labor intensive project. For Phase 1, REX module screens were added to DWDAL's existing MWE-Virtual One–Stop operating system. Phase 1 functionality enables UI claimants to log-in to the system and enter their required number of valid job contacts (i.e. at least three per week) on the REX Work Search Verification log as a permanent retrievable record after filing their weekly claim certification with DUI. REX displays a new reemployment strategy weekly after the required work search contacts are entered as complete. With the Division's collective efforts, Phase 1 of the Reemployment Exchange (REX) module was successfully implemented on December 31, 2017.

Phase 2 involves integration of the MWE-REX module to DUI's BEACON System. This will allow critical data to be exchanged in real-time seamlessly between systems and for all users (i.e., claimants, employers and staff) to move seamlessly within the required workflow of both systems without having to log out and re-log in for each occasion. This single sign-on token exchange functionality will be critical for UI claimants needing to complete their weekly claim certification, their work search verification process and other required UI/reemployment activities for payment of benefits. DUI's BEACON System will establish a viable feedback loop for the UI program and provide real-time transmission of claimant work search activity between systems. Phase 2 of REX is slated with the implementation and deployment of Reemployment BEACON duringQ1-2020.

In addition to system integration activities for enhanced delivery services to claimants, Maryland DUI is establishing new work search requirements and working with DWDAL to implement additional reemployment touchpoints activities with system alert notification reminders throughout the claims series (beyond the required mandated RESEA and Maryland ROW workshops) to hasten the claimant's return to work efforts. Maryland DUI will require UI claimants to not only enter their work search contacts but to conduct at least three (3) required work search contact activities in the MWE-REX System which REX will document and retain as

a permanent record. After the 8th consecutive paid week of benefits, including TO claims, the minimum work search contact requirement will automatically increase from three (3) to five (5) work search contacts per week to increase UI claimants' opportunities for becoming reemployed.

Maryland anticipates the implementation of BEACON, along with Maryland's work search requirements and reemployment touchpoint activities will allow the Division to fully attain the mission, goals and services.

Improving Data Validation and Federal Reporting

Maryland DUI utilizes Data Validation (DV) to validate the accuracy of UI required reports (UIRR). Currently, Maryland's Reported and Validated counts failed to meet the two percent passing range of USDOL's acceptable level of performance (ALP). Some causes of the failing populations include: data entry errors, coding errors, incorrect timeframe in which data for reports are compiled, and failing to run UIRRs and data validation extract files simultaneously.

Corrective steps have been implemented by Maryland to bring the Data Validation Program within compliance to USDOL's ALP. These steps include: (1) meeting with Unit Supervisors to discuss the importance of staff accurately entering data codes in the system, (2) meeting with reporting staff to ensure the correct totals are entered in the SUN System, (3) and submitting a Work Order Request to Information Technology to request changes to the Data Validation Program (i.e., running the UIRRs simultaneously with the Data Validation reports).

It is important to note that every recommendation does not necessarily correct the problem on the first run. However, these processes have decreased the "Difference Percentages" on the Report Validation, bringing several Populations within ± 2 percent passing range. These strategies proved effective in improving Data Validation performance for other failing populations (i.e., Benefit Populations 1, 4 and 6 and Tax Populations 1 and 4). This will result in an ongoing process until the issue is permanently resolved. The Data Validation Coordinator will continue to utilize the aforementioned processes and Maryland DUI anticipates steady improvement for Benefit Population 3, Tax Population 2 and Module 4 (Successor).

Addressing Worker Misclassification

Maryland DUI has a proven history of quality audit results. The Division has passed the national review of field audits for Tax Performance System (TPS) standards over the past ten years and met or exceeded the national minimum scores for USDOL Effective Audit Measures (EAM) for the past three years. During 2018 through June 2019, the Tax Field Audit Unit discovered and converted 13,669 misclassified workers to employee status. Through these audits, tax agents added $171.6 million in unreported wages and $1.39 million in additional tax revenue to the Trust Fund.

In addition, during 2018, Maryland DUI enhanced its strategic audit assignment selection method alongside the improved tax audit system to ensure continued audit effectiveness and quality results, thereby meeting and exceeding USDOL's acceptable level of performance (i.e., pass 4 factors/score > 7) for Effective Audit Measures. In an effort to foster a positive business climate in the State, the Division sponsored a bill which was enacted as Maryland UI Code Section 8-604

effective October 1, 2017. The new law provides businesses with more time and an additional level of appeal to the Lower Appeals Division to pursue protests of audit findings. DUI continues to educate Maryland employers on the UI Law of covered employment in an effort to improve their compliance and provide excellent customer service.

UI auditors have also worked in the context of the Workplace Fraud Act. UI auditors conduct workplace fraud audits following receipt of complaints from the general public, department inter-office referrals, and information sharing from the Joint Enforcement Task Force and other taxing authorities related to suspected workplace fraud. In collaboration with Task Force member agencies, UI auditors perform joint audits with auditors from the Division of Labor and Industry and the Comptroller's Office. These data driven audits are performed in industries with a history of large numbers of misclassification issues based on historical data, and on employers with disputed benefit claims resulting from workers misclassified as independent contractors.

Incorrect Recording of Issue Detection Date

For this FY20 biennial period, Maryland DUI fell below USDOL's acceptable level of performance for the UI measure, "Incorrect Recording of Issue Detection Date." The required ALP is 95 percent, however Maryland rated 84.2 percent. Analysis of this measure, reveals that additional focus is needed in the area of scheduling non-monetary appointments with timely completion. To meet the ALP measure, Adjudication Supervisors will devote additional time to ensure timely completion of cases and the Coordinator of BTQ will monitor the scheduling of issues and timely completion on a weekly basis utilizing the ETA- 9052 Non-Monetary Determination Time Lapse by Detection Date Report.

3. Coordination with other plans, including WIOA.

Most recently during July 2019, Maryland DUI collaborated with NASWA Integrity Center's team of subject matter experts and participated in an on-site assessment with a series of discussions and recommendations designed to improve UI programs and services to stakeholders. DUI will continue their dialogues, as they works to improve program accountability and performance efforts.

For full details, see Improving Prevention, Detection and Recovery of UI Improper Payments within this Biennial State Plan Narrative.

Maryland DUI continues to address the WIOA provisions relative to the operations of the UI Program. For full details on how Maryland DUI is addressing provisions within WIOA, please see both sections within this Biennial State Plan Narrative -Reemployment of UI Claimants and Workforce Innovation Opportunity Act (WIOA).

B. Federal emphasis (GPRA goals), if required

1. Maryland performance compared to the GPRA goal:

UI Performance Measure & GPRA Goal	Maryland FY-2019	Maryland FY-2020
Percent of Intrastate First Payments Made Timely (87% within 14/21 Days)	89.33%	91.69%
Detection of Recoverable Overpayments (Establish at least 54.5%)	63.83%	44.47%
Percent of Employer Tax Liability Determinations Made Timely (89.6% made within 90 days of the end of 1st quarter)	89.52%	87.50%

2. Actions planned to achieve GPRA goals and targets.

GPRA – Percent of Intrastate Payments Made Timely

Maryland FY20 performance level for this measure is 91.69 percent. The GPRA goal was exceeded by 2.36 percent. DUI is committed to maintaining compliance for this measure. Contributing factors to sustain this improvement include:

- Reducing Backlogs – Reducing pending backlogs by utilizing Claims and Adjudication Center supervisory staff with claims processing
- Metrics-Focused Reports – Utilizing appropriate metrics to track and monitor first pay timeliness
- Case Aging Reports – Monitoring case aging reports to ensure non-monetary determinations are completed timely
- Root Cause Analysis – Determining the root of claims not processed within the 21 day requirements
- Staff Development – Educating claim center staff on federal reporting requirements to better understand the impact that improper payments have on the integrity rate

GPRA – Detection of Recoverable Overpayments

Maryland FY20 performance level for this measure is 44.47 percent. Maryland failed to meet the GPRA goal by 10.03. DUI attributes this primarily to both a loss in management and frontline staff. The Benefit Payment Control Unit is currently re-staffing and anticipates six (6) new hires by the end of the 1st quarter of federal FY 2020, with comprehensive training to follow. In addition, Maryland began expanding quarterly cross matches during quarter ending 6/30/2019 in order to detect additional overpayments. These actions should result in significant improvements for the GPRA measure.

GPRA - Percent of Employer Tax Liability Determinations Made Timely

Maryland FY20 performance level for this measure is 87.50 percent. Maryland missed the GPRA goal slightly by 1.5 percent. DUI attributes this to a decrease in staffing levels. To meet the GPRA target, the Tax Unit began streamlining procedures for non-liable determinations during the end of June 2019 in order to establish employer accounts in a more timely manner. In addition, with the deployment of the Reemployment BEACON system (slated for Q1-2020) employers will be able

to register and establish new accounts on the same day. Once this new functionality is implemented, DUI anticipates exceeding the GPRA target.

C. Program Review Deficiencies
Maryland DUI completed all required reviews and activities:

- All Internal Security Reviews/Security awareness training has been conducted for DUI staff
- The BAM Unit is currently in compliance with all State and Federal measurements.
- The Tax Performance System (TPS) annual report for 2018 was completed and submitted timely.

D. Program Deficiencies
There were no program deficiencies identified through Internal Security reviews or the TPS reviews.

E. Reporting Deficiencies
Maryland's reporting deficiency for this biennial submission is pertaining to the ETA-9049 – Profiling and Reemployment Services Outcomes Report that captures the outcomes of reemployment service activities of claimants identified as likely to exhaust their UI benefits. The report is generated quarterly with populated data directly from Division of Workforce Development. The ETA-9049 reports in question were provided to DUI timely from DWDAL, however Q1-2018, Q2-2018, Q3-2018, Q4-2018, Q1-2019 and Q2-2019 reports were not submitted within the SUN System. The due date is by the 20th of the following month as required by USDOL. Maryland DUI has taken immediate corrective action for the missing reports and actions to prevent future occurrences of any potential reporting deficiencies. As of 8/30/2019, all missing quarters for 2018 have been entered in the SUN System. ETA-9049 Reports for 2019 -Q1 and Q2 will be entered by the end of the first week in September 2019 (i.e., 9/6/19), as these quarterly reports can only be entered sequentially. Effective 8/30/2019, Maryland DUI has established two additional (2) Federal Report Liaisons to ensure timely submission of ETA report submissions in the SUN System.

F. Customer Service Surveys (optional)
Maryland has no survey data to report for this submission.

G. Other (e.g., approach to maintaining solvency, requests for technical assistance)

Maryland has implemented strategies to grow the trust fund in an attempt to meet or exceed the solvency and tax maintenance requirements to be eligible for interest free borrowing in accordance with 20 C.F.R. §606.32. In 2016, §8-612(f) was added to Maryland's Unemployment Insurance Law requiring continuing applicability of the Table of Rates in effect for the immediately preceding calendar year for any calendar year beginning on or after January 1, 2017, if: (1) the trust fund balance on September 30 of the immediately preceding calendar year was at a level that would result in a Table of Rates that had lower rates being applied, and (2) the federal funding goals requirement in 20 C.F.R. §606.32 were not met as of December 31 of the second immediately preceding calendar year.

Maryland continues to aggressively collect overpaid unemployment benefits and delinquent employer taxes, and has worked to develop strategies to reduce the improper payment rate (as mentioned more specifically in areas of this plan). Maryland also continues to effectively audit employers to identify misclassified workers. The trust fund is strengthened as a result of these efforts.

Maryland routinely seeks guidance and/or technical assistance from the National and Regional USDOL Offices, and periodically with the National Association of State Workforce Agencies (NASWA) UI Integrity Center. DUI will continue their dialogues, as they work to improve program accountability and performance efforts.

H. Assurances

Per UIPL 15-19, by signing the SQSP Signature Page, Maryland Department of Labor certifies that it will comply with the assurances Listed in Handbook 226, 18th Edition, Change 4. Maryland Department of Labor will institute any plans or measures necessary to comply with the requirements.

UIPL 15 requires information for Assurances "h" (i.e., Assurance of Contingency Planning) and "j" (i.e., Assurance of Automated Information Systems Security).

The following are the dates for which Maryland's Information Technology (IT) Contingency Plan, Risk Assessment and System Security Plan were implemented, tested and reviewed/updated:

h. Assurance of Contingency Planning

- Information Technology (IT) Contingency Plan Implemented: 11/2003
- IT Contingency Plan Reviewed/Updated: May 2019
- IT Contingency Plan Tested: June 2019

j. Assurance of Automated Information Systems Security

- Risk Assessment Conducted: May 2019
- System Security Plan Reviewed/Updated: April 2019

IV. Corrective Action Plans (CAPs)

The 2020 Maryland Unemployment Insurance SQSP Corrective Action Plans (CAPs) can be found at the following link: http://www.dllr.state.md.us/employment/wioauisqsp.shtml

V. UI Integrity Action Plan (IAP)

Maryland's Integrity Action Plan (IAP) Narrative for Biennial State Plan FY2020

Maryland DUI is implementing the following current and proposed Integrity efforts to address its top three root causes of improper payments: Work Search Errors, Benefit Year Earnings (BYE) and Separation Issues.

Work Search Errors - 65.0 percent

Maryland will continue to utilize the Reemployment Exchange (REX) Module housed within DWDAL's MWE System. The REX solution is designed to provide claimants all the tools needed for success in landing a suitable job. REX will enable agency staff to track claimant's work search efforts, evaluate the claimant's work status against thresholds set by DUI (i.e., at least three work search contacts weekly), and offer reemployment assistance and guidance as necessary. DUI will continue to monitor feedback from the Claim Centers and BAM staff to update instructions on how to complete work search screens in REX.

The MWE-REX system will assist with the agency's ability to verify work search contact entries. It will notify the agency when a claimant is not seeking work, placing restrictions on their availability to work or has other barriers to employment. This will allow for the timely resolution of issues detected early in the claims process. While collecting claimants' work search information weekly, REX will monitor and ensure claimants are fulfilling all of their work search requirements while providing labor market information to help claimants become re-employed. Maryland is currently utilizing the REX Module (from phase 1 implementation) to collect claimants work search information.

Maryland will begin receiving real-time updates of claimants' attendance for required workshops, i.e., the RESEA and ROW.

Phase 2 of REX integration to Reemployment BEACON is anticipated upon full implementation of BEACON during the 1st quarter of 2020.

To increase claimant accountability, DUI will increase the claimant's awareness of their responsibilities concerning work search requirements. To this end, Maryland DUI is proposing the following:

1. Work Search Accountability:

    a. Upon implementation of the BEACON System, all claimants will be required to use the internet to file their weekly certifications.

    b. Maryland DUI will require all UI claimants to conduct at least three (3) required work searches in MWE system each week which the REX System will document and retain a permanent record. Claimant's work searches in REX will be captured at the time they are completed, counted and documented for their weekly claim certification. This will reduce confusion for claimants and their weekly work search contacts will be properly recorded. Both, BEACON and REX Systems will accept attendance in a workshop, reporting to an AJC for additional services, and/or other services through an AJC as a valid work search contact each week.

c. To reduce work search errors, the MWE-REX System will restrict the number of weeks claimants may certify at one time.

d. The System will provide real-time transmission of work search information from MWE-REX to BEACON and vice versa from BEACON to MWE-REX.

e. The MWE-REX System will continue to display a (weekly) reemployment strategy after the work searches have been documented in the MWE-REX Module.

f. The BEACON System will send triggers to MWE in order for alert notifications (via email /text) to be sent to UI claimants.

g. Maryland DUI will establish fraud penalties more aggressively for false work search contacts.

2. UI Representation at Required Workshops:

   Maryland is evaluating the effects of having a UI representative at all RESEA and ROW workshops to explain all work search requirements.

3. New Interactive Voice Response System:

   Maryland installed a new IVR system in the 4th quarter of 2019. The new system provides additional messaging via phone to remind claimants of their work search contact requirements and other responsibilities.

4. New Online Integrity Video:

   Claimants are encouraged to review the new Integrity Video "Sometimes Good People Make Bad Decisions", prior to creating a PIN number to file their first weekly claim. Maryland has added the video to multiple pages on the DUI website. In the future, Maryland anticipates embedding the videos in the claims taking process.

5. Additional Work Search Contact Questions:

   Work search contact questions have been added to all of the fact finding questionnaires. Whenever an issue is adjudicated, the claimant will be questioned about their work search contacts for previous weeks.

6. New Claimant Declaration Statement to the Web Claim Certification:

   We have added a declaration statement for claimants to the web claim certification which reads as follows: "I understand that Maryland Law provides for fines and/or imprisonment in addition to disqualification and repayment of benefits, if I knowingly provide false information in order to obtain benefits. Falsification of my work search information will

be considered fraud. I certify that the work search contact information I have provided on this weekly certification for Maryland UI benefits is complete and accurate. The answers to all questions are correct and truthful."

7. Updated UI Correspondence to Claimants:

   DUI is updating all claimant correspondence in preparation for changes related to the new system.

Benefit Year Earnings - 20.52 percent

Current Efforts:

National Directory of New Hires (NDNH):

1. Maryland will continue to use NDNH, quarterly and monthly cross-matches to help detect benefit year earnings. DUI is developing models to detect and prevent overpayments to incorporate in the new UI system, Reemployment BEACON. Additionally, the BPC Unit is addressing staffing issues and is currently in the process of hiring six (6) new staff specialists. This staffing shortage has affected BPC's ability to address benefit year overpayment issues. To assist BPC, claim center staff is currently handling some NDNH cross-match and fraud issues.

2. A NDNH Congratulations Letter is being revised to incorporate a fraud warning statement.

3. The appointment notice for NDNH issues has been revised to include more information in advance on the possibility of an overpayment and/ or fraud.

4. Maryland DUI is in the process of recruiting a Data Analyst to develop and implement additional analytic tools to enhance fraud detection in the system.

5. Maryland DUI has also added a fraud statement to the internet continued claims filing page. Claimants must certify that they have read and understand the consequences of giving a false statement before they can complete their weekly claim.

Proposed Efforts:

a. Claims will be flagged as soon as there is a hit on the NDNH to stop benefits and force the claimant to call in for assistance in filing their claim. The claimant will then be transferred to a claims examiner who will interview the claimant concerning their employment and completing the claims process.

b. DUI will use additional methods, including the Systematic Alien Verification for Entitlements (SAVE) Program, to block identity thieves from completing claims.

c. Maryland DUI will use predictive analytics to assign a probability-of-fraud to claims.

Separations Issues – 9.35 percent

DUI is also combating Separation Issues by encouraging employers to use the State Information Data Exchange System (SIDES). Maryland employers are redirected to SIDES E-Response when responding electronically to requests for separation information through the Net 207 application. Only Maryland employers with a valid Maryland account number, Federal Employer Identification Number (FEIN), and a pending request for separation will be redirected to SIDES E-Response. All others will continue to be directed to the Net207 application.

Additional Integrity Action Plan Efforts:

Benefit Timeliness & Quality (BTQ)
The BTQ unit continues to review non-monetary determinations for quality fact-finding and timely decisions. BTQ has expanded the review process by reviewing the entire claim (i.e., not solely the final decision) to ensure all potential issues on the claim have been addressed. Problem areas identified by this expanded review process will be reported back to the affected units for training purposes.

Fraud
Maryland DUI has participated in national efforts to address UI fraud resulting from organized identity theft. Designated staff have been given access to the Suspicious Actor Repository (SAR) and utilization is encouraged for information related to fraud cases. BPC, BAM and TAX staff have also attended Fraud Investigator Training offered by the NASWA UI Integrity Center when it was conducted in Baltimore Maryland. Currently, DUI does not have a Data Analyst to fully benefit from the SAR program.

Training
Maryland staff is utilizing training modules located on the UI Integrity Academy for supplemental training for new hires and upgrading skills for current employees.

Training on the new system, Reemployment BEACON, has started and will continue up to implementation slated for the 4th quarter of 2020. This will give staff extra time to become familiar with the new system before it goes live.

BAM
NASWA recommended that BAM institutes utilization of sub-codes, specifically pertaining to BYE (i.e., 100 and 110 ei3 series) and Work Search (i.e., 420 ei3 series) Errors.

Communication
Maryland DUI will use claimant messaging tools provided by the NASWA State Intensive Services Team. The messaging will be modified to match Maryland's laws and policies on work search and other reporting requirements. The Communications and Training Unit continues to ensure that claimant messaging is clear and concise. DUI's Communications Unit is exploring additional messaging via multiple communication mediums regarding work search requirements, what acts constitute fraud, and the consequences of engaging in fraud. DUI will educate the public

on work search requirements through online videos and customer presentations. They will continue to ensure consistency in all platforms of messaging. In addition, they will work with MD Labor webmaster to insert links to all Integrity Videos created by the National Integrity Center of Excellence. Links to Integrity Videos for employers and claimant, created by the National Integrity Center of Excellence, are currently inserted on the MD Labor webpage. This process will be ongoing.

The 2020 Maryland Unemployment Insurance SQSQ UI Integrity Action Plan (IAP) can be found at the following link: http://www.dllr.state.md.us/employment/wioauisqsp.shtml

VI. Organizational Chart

The 2020 Maryland Unemployment Insurance SQSP organizational chart can be found at the following link: http://www.dllr.state.md.us/employment/wioauisqsp.shtml

VII. Signature Page

U.S. Department of Labor
SWSP Signature Page
OMB Control No.: 1205-0132
Expiration Date: 02/28/2021
U.S. Department of Labor Employment and Training Administration
Federal Fiscal Year
State MD

Unemployment Insurance State Quality Service Plan Signature Page
This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration and Maryland Department of Labor.

The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by MD Labor, and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

STATE ADMINISTRATOR Dayne M. Freeman
SIGNATURE
DATE 9/24/19

The 2020 Maryland Unemployment Insurance SQSP signature page can be found at the following link: http://www.dllr.state.md.us/employment/wioauisqsp.shtml

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM
(OMB Control No. 1205-0040)

(a) Economic Projections and Impact

The projections for Maryland are developed in OWIP within MD Labor. This section will discuss long-term projections for industries and occupations in the state that have the most potential to benefit older workers seeking unsubsidized employment. Further, it will provide current and future strategies to identify and coordinate training opportunities to improve the employment prospects of the Program-eligible population.

(1) Discuss long-term projections for jobs in industries and occupations in the state that may provide employment opportunities for older workers. (20 CFR 641.302(d))(May alternatively be discussed in the economic analysis section of strategic plan.)

Long-term projections for jobs in industries and occupations in Maryland

According to the latest Labor Market Information, the long-term projections of employment in Maryland are promising through 2026 with the exception of government and mining, quarrying, and oil and gas extraction.

Table: Maryland Industry Projections 2016 - 2026

Industry	Employment 2016	Employment 2026	Employment Change	Percent Change
Total All Industries	**2,550,997**	**2,745,450**	**194,453**	**7.6%**
Agricultural, Forestry, Fishing and Hunting	5,259	5,657	398	7.6%%
Mining, Quarrying, and Oil and Gas Extraction	1,172	978	-194	-16.6%
Utilities	10,054	10,115	61	0.6%
Construction	160,901	181,202	20,301	12.6%
Manufacturing	103,589	104,505	916	0.9%
Wholesale Trade	85,918	88,267	2,349	2.7%
Retail Trade	291,295	307,852	16,557	5.7%
Transportation and Warehousing	84,370	90,886	6,516	7.7%
Information	41,434	43,857	2,423	5.8%
Finance and Insurance	95,225	100,927	5,702	6.0%
Real Estate and Rental and Leasing	45,037	46,440	1,403	3.1%
Professional, Scientific, and Technical Services	252,955	273,060	20,105	7.9%

Industry	Employment 2016	Employment 2026	Employment Change	Percent Change
Management of Companies and Enterprises	26,048	28,118	2, 070	7.9%
Administrative and Support and Waste Management and Remediation Services	170,532	186,597	16,065	9.4%
Educational Services	143,752	154,567	10,815	7.5%
Healthcare and Social Assistance	369,131	432,773	63,642	17.2%
Arts, Entertainment and Recreation	47,461	51,233	3,772	7.9%
Accommodation and Food Services	227,049	246,679	19,630	8.6%
Other Services (Except Government)	91,191	97,463	6,272	6.9%
Postal Service	17,841	17,905	64	0.4%
Government	280,783	276,369	-4,414	-1.6%

Source: http://www.dllr.state.md.us/lmi/iandoproj/

Maryland's diversified economy offers employment opportunity to individuals with low, high, or specialized skills. The table above illustrates the importance of isolating and targeting those industries most conducive to the provision of solid and viable employment to individuals at various levels of skill. MD SCSEP works with local employment partners to collaborate on best practices to engage, train, and ultimately place low-income seniors in jobs within industries that have the most potential for job growth. Currently, MD SCSEP is experiencing training assignment success within the following areas:

- Hospitality and Food Services,
- Administrative and Support Services,
- Healthcare and Social Assistance, and
- Religious, civic, professional and similar organizations.

In addition to state and local government, these aforementioned areas are where the bulk of MD SCSEP trainees declare interest, receive training, and are ultimately placed for unsubsidized employment.

(2) Discuss how the long-term job projections discussed in the economic analysis section of strategic plan relate to the types of unsubsidized jobs for which SCSEP participants will be trained and the types of skill training to be provided. (20 CFR 641.302(d))

Aligning MD SCSEP with High Growth Industries in Maryland

The long term projections in the areas of healthcare, administrative and support services, transportation, and warehousing are industries of interest to MD SCSEP, as these are the industries in which majority of the community service assignments are being developed.

Table: High-Growth Industries in Maryland 2016 – 2026

Of all the total industries in Maryland Industry Projections 2016 - 2026, the chart below summarizes the industries with more growth potential. These industries have a percent or more percent change from 2016 - 2026:

Industry	Employment 2016	Employment 2026	Percent Change
Ambulatory Health Care Services	137,933	180,738	31.0%
Heavy and Civil Engineering Construction	18,639	22,761	22.1%
Warehousing and Storage	16,985	20,617	21.4%
Healthcare and Social Administration	369,131	432,773	17.2%
Waste Management and Remediation Service	9,857	11,312	14.8%
Nursing and Residential Care Facilities	72,838	82,271	13.0%
Construction	160,901	181,202	12.6%
Motion Picture and Sound Recording Industries	3,923	4,386	11.8%
Construction of Buildings	36,796	41,000	11.4%
Specialty Trade Contractors	105,466	117,441	11.4%
Funds, Trusts and Other Financial Vehicles	313	348	11.2%
Wholesale Electronic Markets and Agents and Brokers	15,181	16,856	11.0%
Securities, Commodity Contracts, and Other Financial Investments and Related Activities	18,286	20,278	10.9%
Water Transportation	1,105	1,221	10.5%

Source: http://www.dllr.state.md.us/lmi/iandoproj/

MD SCSEP is very interested in the amusement, gambling, and recreation industry due to its long term job development potential for older workers in the current service area. For example, Rocky Gap Casino opened in May 2013 in Cumberland, Maryland, and the Horseshoe Casino opened in August 2014 in Baltimore City. Both facilities have quickly become employers of choice in their respective regions. The Horseshoe Casino employs 1,700 workers in a variety of roles. Organizational leaders are committed to hiring Baltimore City residents and are offering extensive training specific to various fields, including game dealing, customer service, security, and food and beverage services.

The program intends to further develop similar opportunities at the National Harbor development project. The program intends to coordinate with the Maryland National Grantee, Senior Service America, Inc., as well as local workforce development initiatives in Prince George's and Charles counties, to draw participants living within the commuting area to lucrative, long-term job training and unsubsidized employment opportunities.

Occupational growth, which occurs by job without regard to specific industry, will also continue to factor into how MD SCSEP establishes and executes job development partnerships.

Table: Occupational Growth Projections 2016 – 2026

Occupational Code	Occupational Title	Employment 2012	Employment 2022	Projected Annual Percent Growth Rate
35-0000	Food Preparation and Serving Related Occupations	215,791	235,107	9.0%
15-0000	Computer and Mathematical Occupations	124,695	132,842	6.5%
15-1100	Computer Occupations	117,471	125,310	6.7%
29-0000	Healthcare Practitioners and Technical Occupations	172,797	196,957	14.0%
25-0000	Education, Training, and Library Occupations	105,790	113,496	7.3%
13-0000	Business and Financial Operations Occupations	173,5569	183,488	5.7%
35-3000	Food and Beverage Serving Workers	112,673	122,785	9.0%
11-0000	Management Occupations	171,539	182,005	6.1%
13-1000	Business Operations Specialists	112,314	118,775	5.8%
53-0000	Transportation and Material Moving Occupations	175,626	188,565	7.4%
29-1000	Health Diagnosing and Treating Practitioners	109,738	124,789	13.7%
47-0000	Construction and Extraction Occupations	141,670	156,409	10.4%
39-0000	Personal Care and Service Occupations	100,954	108,952	7.9%
41-0000	Sales and Related Occupations	288,143	304,995	5.8%
43-0000	Office and Administrative Support Occupations	407,810	440,032	7.9%
37-0000	Building and Grounds Cleaning and Maintenance Occupations	98,956	106,574	7.7%

Source: http://www.dllr.state.md.us/lmi/iandoproj/maryland.shtml

(3) Discuss current and projected employment opportunities in the state (such as by providing information available under §15 of the Wagner-Peyser Act (29 U.S.C. 491-2) by occupation), and the types of skills possessed by eligible individuals. (20 CFR 641.325(c))

Opportunities in Maryland's Healthcare Economy

Maryland has emerged as an international leader in healthcare, support services, and medical innovation. MD SCSEP participants increasingly are seeking training assistance that will help them qualify for healthcare industry-related jobs; therefore, the program will be intensely focused on cultivating and expanding training partnerships throughout the entire service area. Maryland has about 70 hospitals.

Table: Maryland Hospitals within the MD Labor SCSEP Service Area

Hospitals	**Location**
Western Maryland Regional Medical Center	Allegany County
Anne Arundel Medical Center	Anne Arundel County
Baltimore VA Medical Center	Baltimore City
Bon Secours Hospital	Baltimore City
The Johns Hopkins Hospital	Baltimore City
Johns Hopkins Bayview Medical Center	Baltimore City
Kennedy Krieger Institute	Baltimore City
Levindale Hebrew Geriatric Center and Hospital	Baltimore City
MedStar Good Samaritan Hospital of Maryland	Baltimore City
MedStar Harbor Hospital	Baltimore City
MedStar Union Memorial Hospital	Baltimore City
Mercy Medical Center	Baltimore City
Mt. Washington Pediatric Hospital	Baltimore City
St. Agnes Hospital	Baltimore City
Sinai Hospital of Baltimore	Baltimore City
University of Maryland Medical Center	Baltimore City
University of Maryland Medical Center Midtown Campus	Baltimore City
University of Maryland Rehabilitation and Orthopedic Institute	Baltimore City
University of Maryland University Specialty Hospital	Baltimore City
VA Maryland HealthCare System Baltimore VA Medical Center	Baltimore City
MedStar Franklin Square Medical Center	Baltimore County
Greater Baltimore Medical Center	Baltimore County
Northwest Hospital	Baltimore County
Sheppard & Enoch Pratt Hospital	Baltimore County
University of Maryland, St. Joseph Medical Center	Baltimore County
Calvert health Medical Center	Calvert County
Carroll Hospital	Carroll County
Union Hospital	Cecil County
University of Maryland Charles Regional Medical Center	Charles County
University of Maryland Shore Medical Center at Dorchester	Dorchester County
Frederick Health Hospital	Frederick County
Garrett Regional Medical Center	Garrett County
University of Maryland Harford Memorial Hospital	Harford County
University of Maryland Upper Chesapeake Medical Center	Harford County

Hospitals	Location
Howard County General Hospital	Howard County
University of Maryland Shore Medical Center at Chestertown	Kent County
Adventist Healthcare Germantown Emergency Center	Montgomery County
Adventist Healthcare Rehabilitation	Montgomery County
Adventist Healthcare Shady Grove Medical Center	Montgomery County
Adventist Healthcare Washington Adventist Hospital	Montgomery County
Holy Cross Germantown Hospital	Montgomery County
Holy Cross Hospital	Montgomery County
Montgomery Medical Center	Montgomery County
National Institutes of Health (NIH) Clinical Center	Montgomery County
Suburban Hospital	Montgomery County
Walter Reed National Military Medical Center	Montgomery County
Doctor's Community Hospital	Prince George's County
Fort Washington Medical Center	Prince George's County
Saint Luke Institute	Prince George's County
University of Maryland Prince George's Hospital Center	Prince George's County
Southern Maryland Hospital Center	Prince George's County
University of Maryland Bowie Health Center	Prince George's County
University of Maryland Laurel Medical Center	Prince George's County
University of Maryland Shore Emergency Center at Queenstown	Queen Anne's County
MedStar St. Mary's Hospital	St. Mary's County
Edward W. McCready Memorial Hospital	Somerset County
University of Maryland Shore Medical Center at Easton	Talbot County
Meritus Medical Center	Washington County
Peninsula Regional Medical Center	Wicomico County
Atlantic General Hospital	Worcester County

https://msa.maryland.gov/msa/mdmanual/01glance/html/hospital.html#hospital

The Johns Hopkins Hospital has been ranked as one of the nation's top medical institutions for more than two decades. Johns Hopkins Institute, headquartered in Baltimore City, is one of the state's largest private employers; in FY10 the health care system employed 40,000 people worldwide. The University of Maryland Medical Center (UMMC), also located in Baltimore, provides a full range of healthcare services to the Mid-Atlantic Region. The flagship academic medical center for the state, UMMC is comprised of 13 hospitals that make up the University of Maryland Medical System. The University of Maryland Medical System employs 9,173 people. Currently, some of the MD SCSEP participants serve in the food service department at UMMC. The goal is to expand the partnership with UMMC and triple the number of training opportunities and seek and secure other training opportunities throughout various departments within UMMC.

The table below further illustrates the projected job development (and need for skilled workers) in healthcare industry occupations.

Table: Occupations in the Healthcare Sector with the Largest Anticipated Employment Changes

Occupation Code	Occupational Title	Employment 2016	Employment 2026	Percentage Change	Education Value
29-2021	Dental Hygienists	3,585	4,679	30.5%	Associate's degree
31,991	Dental Assistants	5,801	7,538	29.9%	Postsecondary non-degree award
29,2057	Ophthalmic Medical Technicians	864	829	28.2%	Postsecondary non-degree award
31-2022	Physical Therapist Aides	1,548	1,967	27.1%	High school diploma or equivalent
31-2021	Physical Therapist Assistants	1,602	2,031	26.8%	Associate's degree
31-9092	Medical Assistants	11,120	14,065	26.5%	Postsecondary non-degree award
31-2011	Occupational Therapy Assistants	660	829	25.6%	Associate's degree
	Phlebotomists	2,041	2,544	24.6%	Postsecondary non-degree award
31-2012	Occupational Therapy Aides	108	134	24.1%	High school diploma or equivalent
29-2035	Magnetic Resonance Imaging Technologists	935	1143	22.2%	Associate's degree
31-1011	Home Health Aides	11,317	13,455	18.9%	High school diploma or equivalent
29-2099	Health Technologists & Technicians, All Other	2,561	3,015	17.7%	Postsecondary non-degree award
29-2081	Opticians, Dispensing	1,453	1,706	17.4%	High-school diploma or equivalent

29-2034	Radiologic Technologist	4,049	4,718	16.5%	Associate's degree
29-2055	Surgical Technologists	1,977	2,289	15.8%	Postsecondary non-degree award
31-9094	Medical Transcriptionists	658	756	14.9%	Postsecondary non-degree award
31-1014	Nursing Assistants	29,697	33,998	14.5%	Postsecondary non-degree award
29-2041	Emergency Medical Technicians & Paramedics	4,827	5,471	13.3%	Postsecondary non-degree award
29-2071	Medical Records and Health Information Technicians	4,001	4,520	13.0%	Postsecondary non-degree award

Source: http://www.dllr.state.md.us/lmi/iandoproj/maryland.shtml

Employment estimates by occupation are specific to the Healthcare and Social Assistance Sector industries.

Other Employment Opportunities in Maryland

Almost all of the occupations in Maryland that are projected to grow require either specialized long term training, such as a secondary or postsecondary academic certificate or Bachelor's degree, or short-term OJT. MD SCSEP anticipates that as more high-skilled baby boomers age in the state, the program will experience the need to develop higher-level training assignments to attract and place older adults with college degrees who may also be experiencing poverty. However, the majority of current participants have no college degree and are therefore prime candidates for training opportunities that occur on the job or have shorter-term qualifying certification periods. The occupations that require short-term OJT include food preparation and service related occupations, transportation and material moving occupations, construction and extraction occupations, personal care and service occupations, and building, and grounds cleaning and maintenance occupations.

Occupations in the food service industry such as hosting, wait staff, food prep workers, and cooks require limited education and generally compensation tends to be on the lower end of the wage spectrum. The Maryland General Assembly has increased minimum wage above the federal level to $ 10.10 per hour, and it is slated to increase yearly until it reaches $ 11.00 per hour effective July 1, 2020. (This minimum wage increase excludes certain food service occupations.) Under MD SCSEP, several participants are currently training at senior centers, hospital cafeterias, and restaurants as food preparers, food handlers, and cooks, roles that traditionally are paid at least

minimum wage. MD SCSEP plans to enroll eligible participants in food handlers' certification programs, which offer basic food safety courses. The completion of certification programs strengthens the participants' ability to secure and maintain unsubsidized employment.

Maryland's economic activity is strongly concentrated in the tertiary, or service, sector, and this sector is a critical partner in helping workers gain unsubsidized employment. One major tertiary service activity is transportation, centered on the Port of Baltimore and its related rail and trucking access. As a result of its proximity to the Port of Baltimore, the Chesapeake Bay, the Atlantic Ocean, the nation's capital, and the major distribution routes along the East Coast, Maryland's transportation infrastructure, including its international airport hub as well as its freight rail system, is a key to the region's economic vitality and quality of life.

The transportation and material moving industry is also projected to be one of the fastest growing industries in Maryland. In this sector, the biggest job opportunities will be in warehousing and storage, transit, and ground passenger carriage. Freight and material movers, hand packers, motor vehicle operators, truck drivers, and bus drivers are just some of the opportunities that will be created by anticipated growth in these industries. For participants who are interested in pursuing these occupations and demonstrate commitment to skills training, MD SCSEP in certain circumstances, will help them acquire a valid training and/or certifications. This could include assistance with obtaining a Commercial Driver's License (CDL), learner's permit, or paid enrollment into a commercial driver's education class. MD SCSEP makes every effort to assess and extend paid training opportunities according to funding availability every program year. Another service area that is anticipated to grow is personal care and hygiene. According to the U.S. Bureau of Labor Statistics, overall employment of barbers, hairdressers, and cosmetologists is projected to grow ten percent from 2014 to 2024, faster than the average for all occupations. The need for barbers will stem primarily from an increasing population, which will lead to greater demand for basic hair care services. Overall job opportunities for personal care and service are expected to grow. A large number of job openings will stem from the need to replace workers who transfer to other occupations, retire, or leave the occupation for other reasons.

Where appropriate, MD SCSEP will make an effort to ensure participants interested in pursuing these occupations can train at nursing home facilities. These training locations are ideal because patients in the long term care facilities rely on personal hygiene service providers to meet patients' personal needs. MD SCSEP may also be able to assist participants in training for their barber or cosmetology license. Once certified, these participants can seek unsubsidized employment with long term care facilities, such as rehabilitative facilities, nursing home facilities, and private assisted living homes.

Current and Projected Employment Opportunities in the State of Maryland

During the most recent economic downturn Maryland lost more than 8,000 businesses, and Maryland's unemployment nearly doubled. Maryland is committed to restoring its economy and creating jobs. In 2018, Maryland has created 29,400 jobs from January 2018 to December 2018 (seasonally adjusted). For a glance of Maryland's current employment opportunities see the chart below:

Table: Maryland Economy at a Glance

Data Series – Labor Force Data	June 2018	July 2018	Aug 2018	Sep 2018	Oct 2018	Nov 2018
Civilian Labor Force	3,198.2	3,196.0	3,193.2	3,193.2	3,193.2	3,194.2
Employment	3,070.9	3,071.3	3,073.4	3,073.4	3,075.0	3,075.5
Unemployment	127.3	124.8	122.1	119.8	118.2	118.2
Unemployment Rate	4.0	3.9	3.8	3.8	3.7	3.7
Nonfarm Wage & Salary Employment						
Total Nonfarm	2746.7	2745.8	2745.6	2741.9	2746.2	2754.1
12-month percent change	0.8	0.7	0.7	0.4	0.5	0.7
Mining, Logging and Construction	163.8	164.5	164.6	164.4	165.1	165.0
12-month percent change	-02	0.7	0.7	0.5	1.2	0.9
Manufacturing	108.3	108.7	108.8	108.7	108.8	108.3
12-month percent change	1.4	1.9	1.8	1.5	1.2	0.7
Trade, Transportation and Utilities	469.1	468.5	467.5	467.0	466.0	467.9
12-month percent change	0.1	0.0	-0.4	-0.6	-0.7	-0.7
Information	36.6	36.2	36.3	35.8	36.1	36.6
12-month percent change	-2.7	-2.9	-2.7	-4.0	-3.5	-1.3
Financial Activities	144.7	144.3	143.9	143.8	143.1	142.7
12-month percent change	-1.2	-2.3	-2.6	-2.8	-2.1	-2.3
Professional and Business Services	450.9	451.9	451.6	451.5	450.1	453.3
12-month percent change	1.3	1.6	1.5	1.4	1.0	1.8
Education and Health Services	470.8	471.0	471.2	471.1	472.3	474.3
12-month percent change	3.2	-1.9	1.7	1.6	1.7	2.0
Leisure and Hospitality	281.9	282.8	283.0	281.9	282.2	284.6
12-month percent change	0.6	1.3	1.2	0.8	0.7	1.4
Other Services	114.2	114.2	114.3	113.9	116.5	115.4
12-month percent change	0.0	0.3	0.5	0.0	2.2	1.4
Government	506.4	503.7	504.4	503.8	506.0	506.0
12-month percent change	0.1	0.0	0.5	0.2	0.5	0.4

Source: http://www.bls.gov/regions/mid-atlantic/maryland.htm#tab-1

MD SCSEP anticipates that it will be able to continue to assist older workers in gaining new skills and employment opportunities in line with the economic projections for the state. The program will utilize industry and occupational growth information to recruit new host agencies and develop new training partnerships; better allocate and prioritize the use of training funds across a broad spectrum of participant training needs; and to recruit effective employment partners in public and private industries and organizations.

(b) Service Delivery and Coordination

Section 2: Service Delivery and Coordination

The SCSEP, as administered by the state and national grantee, respectively, is the main focal point of service delivery in job training for low-income older workers. Nationally, SCSEP is funded at a level to serve only .05 percent of the eligible population. SCSEP plays a vital role with regard to employment of the State's 55 and older population as 29.4 percent of Maryland residents are age 55 and older (US Census and The KFF). Despite a low national and state unemployment rate, Americans age 55 suffer from higher rates of job loss and unemployment than other job seekers and many are postponing retirement due to choice or need. For all job seekers age 55+, the average job search takes 27.1 weeks or almost seven months (AARP PI). The labor force participation rate is expected to increase fastest for the oldest segments of the population through 2024 (Bureau of Labor Statistics).

As such, it is important that MD SCSEP closely coordinate the program activities with WIOA Title I and Title III programs; programs under the Older Americans Act (OAA); private and public entities; labor market and job training initiatives; community organizations; and other state programs. Program coordination ensures the reduction of barriers to participation for full spectrum analysis and resource referral process to participants receiving services.

(1) A description of actions to coordinate SCSEP with other programs. This may alternatively be discussed in the state strategies section of the strategic plan, but regardless of placement in document, must include:

Planned actions taken to coordinate SCSEP with other programs

MD SCSEP plans to coordinate activities with other WIOA Title I and Title III programs, community and faith based initiatives, and programs authorized under the Older Americans Act. Specific actions are being taken to integrate the program into MD Labor's workforce development system and AJCs. Currently SCSEP staff, (Employment Specialists and Senior Service Liaisons) are co-located with the AJC staff in Baltimore City, Southern Maryland, Western Maryland, and in the Upper Shore Local Areas. The Labor Exchange Administrators (LEAs), the Job Service Supervisors (who manages the daily operation of the AJC manages the local programs), and the Employment Specialists report directly to the LEAs. SCSEP has coordinated activities with the AJC staff by engaging applicants into the workforce development system before being vetted into the program. Additionally, both the MD SCSEP and National SCSEP have entered into Memoranda of Understanding that include resource sharing agreements with AJCS in each county of operation, per WIOA regulations. All applicants must register in the MWE and complete orientation. Integration meetings were held and the key positions are implementing the following duties:

Labor Exchange Administrators/Job Service Supervisors Duties:

a. Overseeing the local program,
b. Referring applicants to Title I for assessments,
c. Matching SCSEP participants to AJC staff to assist with job coaching services, and
d. Educating the Employment Specialists and Senior Service Liaisons on all of AJCs programs and the MWE.

Employment Specialists/Senior Service Liaisons Duties:

a. Identifying, recruiting and engaging new applicants into the workforce development system and ensuring proper exit procedures;
b. Establishing and cultivating partnership with government and nonprofit organizations;
c. Monitoring participation in SCSEP and AJC activities; and
d. Developing and monitoring the participants' Individual Employment Plan every six months.

Program Manager and Assistant Program Manager Duties:

a. Providing technical assistance and support to the LEAs and SCSEP staff with SPARQ and performance accountability;
b. Monitoring and rotating participants after one year in a training assignment; and
c. Training local SCSEP staff to engage potential SCSEP participants to support local programs for seniors.

Job Service Specialist Duties:

a. Coaching the participants and helping with job search and online applications;
b. Reviewing the Individual Employment Plan with the Employment Specialists every six months; and
c. Providing follow up assistance and access UI wage data to locate potential job placements for exited participants.

Business Service Representative Roles:

a. Conducting outreach to local business and promoting the program and the participants.

Other coordinated activities include: SCSEP staff sponsors hands-on training with the participants, facilitated by AJC staff; trainings focus on the MWE and how to log on, navigate the system, create and/or update profiles and resumes; the SCSEP participants are provided user names and training on how to conduct job searches; and SCSEP participants are expected to complete a minimum of two job searches a month.

Lastly, to support coordination efforts, MD SCSEP will collaborate with AJC staff to coordinate activities with current host agencies and other community and faith based organizations. Activities will include but will not be limited to senior expos, senior job fairs and, open houses. MD SCSEP will collaborate with AJC staff to ensure that issues of employment and training for older mature adults are considered in the local area plans.

Source: Quarterly Narrative Report

(A) Planned actions to coordinate activities of SCSEP grantees with WIOA title I programs, including plans for using the WIOA AJC delivery system and its partners to serve individuals aged 55 and older. (20 CFR 641.302(g), 641.325(e))

Coordination with other WIOA Programs

Maryland operates its Title I activities through its AJCs. All programs and services that are offered in the AJCs are available to SCSEP participants. At the present, MD SCSEP and the MD Labor, DWDAL are in active partnership with the AJCs located across Maryland. The AJCs provide comprehensive services to both job seekers and businesses. For the 11 counties that MD SCSEP serves, partnerships exist at five full service AJCs including:

1. Allegany County (for Allegany & Garrett counties);
2. Charles County (for Charles, Calvert and St. Mary's counties);
3. Talbot County (for Caroline, Kent, Queen Anne's & Talbot counties);
4. Washington County; and
5. Baltimore City.

SSAI, the national SCSEP grantee and its subgrantees, have partnerships with the following 12 counties to provide SCSEP services:

1. Baltimore City,
2. Baltimore County,
3. Anne Arundel County,
4. Carroll County,
5. Cecil County,
6. Dorchester County,
7. Harford County,
8. Howard County,
9. Montgomery County,
10. Prince George's County,
11. Somerset County,
12. Wicomico County, and
13. Worcester County.

Each SCSEP participant works with a SCSEP employment specialist and an AJC staff person to identify the services that would best assist with career goals and movement toward unsubsidized employment. The staff search for opportunities to utilize services provided under WIOA and other related programs available in the local job center. It is the goal of SCSEP to provide and utilize services and programs that are available in the AJCs to assist participants to attain individual and program goals. Participants are assessed and referred to additional services available in each AJC that will aid in reaching employment goals of their Individual Employment Plan (IEP).
MD SCSEP has integrated into MD Labor's AJCs. To strengthen these partnerships, MD SCSEP staff periodically schedule joint meetings with the LEAs at these AJCs to find ways to work together more efficiently. Joint meetings will also ensure that all participants receiving services within the local AJCs become informed of the wealth of supportive services.

(B) Planned actions to coordinate activities of SCSEP grantees with the activities being carried out in the state under the other titles of the Older Americans Act (OAA).
(20 CFR 641.302(h))

Coordination with other OAA Programs

Congress passed the Older Americans Act (OAA) in 1965 in response to concerns by policymakers about a lack of community social services for older adults. Under Title V, the OAA also included community service training and employment for low-income, older Americans. Maryland Department of Aging (MDoA) administers and provides oversight of numerous programs that are authorized by the Older Americans Act. To help coordinate activities, the Secretary and the Deputy Secretary of the Maryland Department of Aging are fully aware of the agency activities conducted under other titles of OAA and will ensure that all opportunities for cooperation and leverage of resources are maximized.

In addition, the MD SCSEP Program Manager will make an effort to collaborate with the program managers from other titles of OAA such as the Aging and Disability Resource Center (known as Maryland Access Point), the Long Term Ombudsman Program and the Senior Health Insurance Assistance Program (SHIP) to better serve the same population. MD SCSEP participants are currently being considered for specialized training with county-level ombudsman coordinators. Participants in this customized training partnership will learn Medicare and Medicare supplemental policies, Medicare prescription drug programs, long-term care insurance, and private health insurance to answer questions and provide assistance to older Marylanders. This training may also lead SCSEP participants to train as ombudsman representatives. MD SCSEP anticipates that each participant selected for this opportunity will become certified to visit residents in the long term care facilities by receiving adequate training and preparation to effectively carry out the responsibilities of the training assignment. Calendar coordination for outreach programming at the senior management level of MDoA will also be implemented to maximize any opportunities for shared staffing and service recruitment resources statewide. If these activities occur outside of the MD SCSEP service area, the program manager will make a standard referral or request, as needed, to SSAI for participation and follow-up.

(C)Planned actions to coordinate SCSEP with other private and public entities and programs that provide services to older Americans, such as community and faith- based organizations, transportation programs, and programs for those with special needs or disabilities. (20 CFR 641.302(i))

Coordination with Public and Private Organizations

MD SCSEP and SSAI participants gain new work experience in a variety of community service activities at government agencies, nonprofits, and public facilities, including schools, hospitals, senior centers, churches, and community action centers.

Table: MD SCSEP Current Host Agencies

Current Host Agencies	County	Type
Allegany County Human Resources Development Commission (HRDC)	Allegany	Not-for-profit
Allegany County Library System – Cumberland	Allegany	Government

Current Host Agencies	County	Type
Cumberland Summer Theater	Allegany	Not-for-profit
Cumberland YMCA	Allegany	Not-for-profit
Horizon Goodwill Industries	Allegany	Not-for-profit
Maryland Department of Labor, Allegany County One-Stop Job Center	Allegany	Government
Rocky Gap State Park	Allegany	Government
Western Maryland Food Bank, Inc.	Allegany	Not-for-profit
Western Maryland Health System	Allegany	Not-for-profit
Baltimore City Health Dept. (Division of Aging and Care Services)	Baltimore City	Government
Harford Senior Center (GEDCO)	Baltimore City	Not-for-profit
MD Labor DWDAL	Baltimore City	Government
Mayor's Office of Employment Development (MOED)	Baltimore City	Government
Maryland Center of Veterans and Education Training (McVet)	Baltimore City	Not-for-profit
Northwest Career Center (MOED)	Baltimore City	Government
Paul's Place	Baltimore City	Not-for-profit
University of Maryland Medical Center	Baltimore City	Not-for-profit
Zeta Center Baltimore Health Department	Baltimore City	Government
Calvert County Office on Aging	Calvert County	Government
Tri-County Youth Services Bureau	Calvert/Charles/ St. Mary's County	Government
AAA Caroline Senior Center	Caroline County	Government
American Job Center (Waldorf One Stop Career Center)	Charles County	Government
Humane Society of Charles County	Charles County	Not-for-profit
Lifestyles of Maryland, Inc.	Charles County	Not-for-profit
MSDE Division of Rehabilitation Services (DORS)	Charles County	Government
Pleasant Grove Missionary Baptist Church	Charles County	Not-for-profit
Pure Play Every Day, Inc.	Charles County	Not-for-profit
Redeeming Life Ministries	Charles County	Not-for-profit
Spring Dell Center, Inc.	Charles County	Not-for-profit
The Arc Southern Maryland	Charles County	Not-for-profit
Appalachian Parent Association, Inc.	Garrett County	Not-for-profit
Garrett County Community Action Committee, Inc.	Garrett County	Not-for-profit
Amy Lynn Ferris Adult Activity Center	Kent County	Government
MSDE Division of Rehabilitation Services (DORS)	St. Mary's County	Government
Three Oaks Center	St. Mary's County	Not-for-profit
American Job Center of Talbot County	Talbot County	Government
Housing Commission of Talbot County	Talbot County	Government
Boys & Girls Club of Washington	Washington County	Not-for-profit
Hagerstown Housing Authority	Washington County	Government
Horizon Goodwill Industries-Hagerstown	Washington County	Not-for-profit
Robert W. Johnson Community Center, Inc.	Washington County	Not-for-profit
SAN MAR-Boster Community of Hope Office	Washington County	Not-for-profit

Current Host Agencies	County	Type
Senior Living Alternatives, Inc.	Washington County	Not-for-profit
The Interfaith Service Coalition	Washington County	Not-for-profit
The Salvation Army	Washington County	Not-for-profit
American Job Center of Washington County	Washington County	Government
YMCA – Hagerstown	Washington County	Not-for-profit

In PY18, MD SCSEP has provided over 63,815community service hours to public and nonprofit agencies, and SSAI provided 253,456 community service hours, allowing them to enhance provision of needed services in the community. The participants train an average of 20 hours a week and are paid $ 10.10 an hour, the current state minimum wage. This training serves as a bridge to unsubsidized employment opportunities for participants.

Table: SSAI SCSEP Current Host Agencies

SSAI Current Host Agencies	County
AAWDC – Linthicum Heights	Anne Arundel
AAWDC – Arnold One Stop	Anne Arundel
Annapolis Housing Authority	Anne Arundel
Department of Aging	Anne Arundel
Department of Aging – Brooklyn Senior Center	Anne Arundel
Housing Authority of the City Annapolis	Anne Arundel
Lutheran Mission Society	Anne Arundel
Mead Village	Anne Arundel
Stanton Community Center	Anne Arundel
AAWDC Arnold One Stop	Baltimore City
ACS-Hope Lodge	Baltimore City
AIRS	Baltimore City
Baltimore City Health Department Care Services	Baltimore City
Baltimore City Health Dept. Chronic Dis. Dept.	Baltimore City
Baltimore City Health Dept. – Chronic Dis. Div.	Baltimore City
Baltimore Teacher's Network	Baltimore City
Banner Neighborhoods	Baltimore City
Basilica Place	Baltimore City
Beans & Bread	Baltimore City
Coppin State University	Baltimore City
Coppin State University Dept. of Applied Psychology and Rehab. Counseling	Baltimore City
Coppin State University of Professional Studies, RCP Health & Human Service	Baltimore City
DORS – Towson	Baltimore City
Eastside Career Center One Stop	Baltimore City
Eubie Blake Central Center	Baltimore City
Fifth Regiment Army	Baltimore City
Forest Park Senior Center	Baltimore City

SSAI Current Host Agencies	County
Generations Family Services	Baltimore City
Greenmount Senior Center	Baltimore City
HABC – Primrose	Baltimore City
HABC – Housing Application Office	Baltimore City
Harbor City Unlimited (Active)	Baltimore City
Harford County Office on Aging	Baltimore City
HEBCAC	Baltimore City
Leonard E. Hicks Community Center	Baltimore City
Levindale Adult Daycare Center	Baltimore City
Levindale Geriatric Center	Baltimore City
Light Health and Wellness	Baltimore City
Maryland Library For the Blind	Baltimore City
Mayor's Office of Constituent Services	Baltimore City
Mayor's Office of Human Services-Homeless Services Program	Baltimore City
McKim Community Association	Baltimore City
Next of Kin Supportive Housing, Inc.	Baltimore City
Project T.O.O.U.R.	Baltimore City
Sandtown Winchester Senior Center	Baltimore City
St. Ambrose Housing	Baltimore City
St. Ann's Adult Daycare	Baltimore City
Volunteers of America	Baltimore City
Zeta Senior Center	Baltimore City
Alzheimers Association	Baltimore County
American Cancer Society	Baltimore County
American Job Center at Hunt Valley	Baltimore County
American Red Cross – MD	Baltimore County
American Red Cross Blood Services Division	Baltimore County
Baltimore County Dept. of Aging, Division of Senior Centers	Baltimore County
Baltimore County Dept. of Aging, Program and Resource Development	Baltimore County
Baltimore County Dept. of Aging, Senior Employment	Baltimore County
Baltimore County Dept. of Aging, Home Team	Baltimore County
Baltimore County Dept. of Aging, MAP	Baltimore County
Baltimore County Dept. of Aging, Senior Health Insurance Program	Baltimore County
Baltimore County Office of Child Support	Baltimore County
BCDA Ombudsman Office, Parkville Office	Baltimore County
BCDA Ombudsman Office	Baltimore County
Catholic Charities Nottingham	Baltimore County
Cedermere Elementary School	Baltimore County
Chimes Inc.	Baltimore County
Columbia Workforce Center	Baltimore County
Community Assistance Network Inc.	Baltimore County
Community Assistance Network – Randallstown	Baltimore County

SSAI Current Host Agencies	County
Dept. of Health & Mental Hygiene – Office of Health Care Quality	Baltimore County
Department of Social Services – Catonsville	Baltimore County
Department of Social Services – Dundalk	Baltimore County
Department of Social Services – Essex Office	Baltimore County
Department of Social Services – Reisterstown	Baltimore County
Department of Social Services – Townson	Baltimore County
Department of Social Services – (MEAP)	Baltimore County
Dept. of Social Services – Day Resource Program Center	Baltimore County
DHMH – Office of Health Care Quality	Baltimore County
Diversified Housing Development Incorporated	Baltimore County
DOS Owings Mills	Baltimore County
Dundalk Renaissance Corporation	Baltimore County
Easter Seals Adult Day Care	Baltimore County
Eastpoint Workforce Development Resource Center	Baltimore County
Eastside Community Development Corps.	Baltimore County
Essex Senior Center	Baltimore County
Fire Museum of Maryland	Baltimore County
Fleming Senior Center	Baltimore County
Greenmount Senior Center	Baltimore County
Liberty Senior Center	Baltimore County
Middle River Middle School	Baltimore County
Northwest Academy of Health Sciences	Baltimore County
Overlea Senior Center	Baltimore County
Parkville Senior Center	Baltimore County
Pearlstone Center	Baltimore County
Pikesville Adult Day Care	Baltimore County
Progressive Steps	Baltimore County
Unified Community Connections	Baltimore County
Windsor Mill Middle School	Baltimore County
Zeta Senior Center	Baltimore County
Carroll County Business & Employment Resource Center	Carroll County
McDaniel College	Carroll County
Westminster MVA	Carroll County
Cecil County Government	Cecil County
Cecil County Help Center	Cecil County
Goodwill Industries of the Chesapeake, Inc.	Cecil County
On Our Own of Cecil County, Inc.	Cecil County
Union Hospital of Cecil County	Cecil County
Harriet Hunter Nutritional Center	Charles County
Delmarva Community Service Inc. Hurlock	Dorchester County
Delmarva Community Services Inc. Cambridge	Dorchester County
Division of Parole and Probation Dorchester County	Dorchester County
MD Labor Frederick	Frederick County
Frederick Branch Maryland Motor Vehicle Administration	Frederick County

SSAI Current Host Agencies	County
JCA SCSEP #66A	Frederick County
Motor Vehicle Administration – Frederick Branch	Frederick County
Goodwill Ind. of the Chesapeake, Inc.	Harford County
Habitat for Humanity Susquehanna – Aberdeen ReStore	Harford County
Harford County Office on Aging	Harford County
Havre de Grace Activity Center	Harford County
Perry Point VA Medical center	Harford County
DORS Columbia	Howard County
M.D.O.T. Columbia DMV	Howard County
Meals on Wheels – Howard County	Howard County
Patuxent Research Refuge	Howard County
Winter Growth, Inc.	Howard County
#661 JCA/SHIP	Montgomery County
Adventist Community Services of Greater Washington - #100	Montgomery County
America-China International Foundation - #114	Montgomery County
Asbury Methodist Village #49	Montgomery County
Catholic Charities – Montgomery County Family Center #108-1	Montgomery County
DHHS Income Support – Germantown #20	Montgomery County
DORS – Wheaton #122	Montgomery County
Easter Seals of Greater Washington #98 1	Montgomery County
Ethiopian Community Center - #137	Montgomery County
Holiday Park Senior Center	Montgomery County
Housing Initiatives Partner (HIP)	Montgomery County
Interfaith Clothing Center #70B	Montgomery County
JCA SCSEP #66A	Montgomery County
JCA/Connect-A-Ride – #663	Montgomery County
Jewish Coalition Against Domestic Abuse (JCADA)	Montgomery County
Jewish Community Center of Greater Washington #65	Montgomery County
Kensington Club #66C	Montgomery County
Misler Adult Day Care Center - #55	Montgomery County
MVA Gaithersburg Branch Office #99	Montgomery County
MVA Glenmont #23	Montgomery County
MVA White Oak- #127	Montgomery County
Phoenix Computers, Inc. - #162	Montgomery County
Silver Spring Regional Center - #18	Montgomery County
Social Security Administration – Rockville #30	Montgomery County
Social Security Administration – Silver Spring - #29	Montgomery County
Thorne Kensington Club – Germantown	Montgomery County
Town Center Apartments – 348	Montgomery County
Bowie Nutrition Center	Prince George's County
Crescent Cities Jaycees Foundation, Inc.	Prince George's County
Department of Family Services	Prince George's County
Department of Family Services Aging CARE Management Unit	Prince George's County
Department of Family Services Nutrition Program	Prince George's County

SSAI Current Host Agencies	County
Department of Family Services SCSEP Program	Prince George's County
DHCD	Prince George's County
Evelyn Cole Center	Prince George's County
Galilee Community Development Corp	Prince George's County
Guardian Angel Transforming Christian Counseling	Prince George's County
Inclusion Services Inc.	Prince George's County
Maryland Motor Vehicle Administration	Prince George's County
Maryland Motor Vehicle Administration Largo	Prince George's County
DORS	Prince George's County
Office of Central Services	Prince George's County
Prince George's County Fire and EMS Landover	Prince George's County
Prince George's County Health Department	Prince George's County
Prince George's County Housing and Community Development	Prince George's County
Prince George's County SCSEP Program	Prince George's County
Town of Capitol Heights	Prince George's County
Town of Fairmont Heights	Prince George's County
William Seymour College	Prince George's County
Mac Inc. – SCSEP – Ringgold	Somerset County
Somerset County Commission On Aging	Somerset County
Board of Education Wicomico County	Wicomico County
Christian Shelter Inc.	Wicomico County
Deers Head Medical Center	Wicomico County
Goodwill Career Center and Retail Store	Wicomico County
Hope and Life Outreach	Wicomico County
Joseph House Workshop Homeless Shelter	Wicomico County
Lower Shore Shelter	Wicomico County
Mac Inc. – Senior Services – Administration	Wicomico County
Mac. Inc. – SCSEP Ringgold	Wicomico County
Wicomico County Free Library	Wicomico County
Ocean City Senior Center	Wicomico County

During the course of the next two years, MD SCSEP and SSAI will continue to promote collaboration and coordination among private and public organizations. MD SCSEP and SSAI's SCSEP will add more state and local government departments and agencies as new host agencies. To support the mandate to better serve minority populations, host agencies that serve in languages other than English will be sought as both MD SCSEP and SSAI prepares to expand job training activities amongst older Asian and Hispanic populations.

MD SCSEP will also continue to utilize the Individual Employment Planning process to target specific private and public entities whose work aligns with participant trainees' employment goals. MD SCSEP is exploring On the Job Experience (OJE) contracts with private, for-profit organizations as an option. These contracts allow MD SCSEP to expand training opportunities to participants approaching job readiness by providing training funds at or near market salary for up to 12 weeks. OJEs are considered successful if the participant, at the conclusion of training and

assessment of effectiveness, is converted to an unsubsidized hire working 20 or more hours per week at a salary not below the market rate.

MD SCSEP and SSAI's SCSEP will continue to coordinate support services information with the representatives of both the State chapter of AARP as well as the following local AARP Maryland Chapters located throughout the service area:

State Chapter	AARP Maryland 200 St. Paul Place, Suite 2510 Baltimore, MD 21202
Allegany County	AARP Chapter 2400 Allegany County St. Lutheran Church 1601 Frederick Street Cumberland, MD 21502-1035
Baltimore City	AARP Chapter 4636 Baltimore City Baltimore Community College 6764 Reisterstown Road, Room 133A Baltimore, MD 21215-2306
Caroline County	AARP Chapter 0915 Caroline County Church of the Nazarene 10660 Greensboro Road Denton, MD 21629-3309
Charles County	AARP Chapter 3845 Jaycees Community Center 3090 Crain Highway Waldorf, MD 20601-2800
Kent County	AARP Chapter 3635 Kent County Upper Shore for the Aging 100 Schauber Road Chestertown, MD 21620-1148
Talbot County	AARP Chapter 1601 Talbot County 400 Brookletts Avenue Easton, MD 21601-3404

MD SCSEP and SSAI SCSEP will continue to make participants aware of AARP member benefits available in their communities. Further, MD SCSEP and SSAI SCSEP will identify the local employers in each of the county jurisdictions that signed the AARP Employer Pledge. Employers that have signed the pledge do so to reflect value of experienced workers and a belief in equal opportunity for all workers, regardless of age. For example, in Baltimore City, the Maryland Women's Heritage Center and DLA Piper, a national law firm, are two of the employers that signed the AARP Employer Pledge. To establish and inform their recruitment of older workers in

Maryland, MD SCSEP will partner with these employers in support of targeting these workers for current and future staffing needs.

Under the guidance and oversight of Maryland Department of Aging, the 19 Area Agencies on Aging (AAA) administer Older Americans Act programs at the local level; however, eight of the 19 AAAs are in the SCSEP service area. Of these eight, currently six AAAs serve as host agencies for the participants. These local agencies advocate for older adults, deliver services, and offer advice and feedback on aging issues. The community service assignments are mostly office and administrative support, food preparation, and service and community and social services. On a few occasions, the AAA hired participants upon the completion of their current training assignments.

(D)Planned actions to coordinate SCSEP with other labor market and job training initiatives. (20 CFR 641.302(j))

SCSEP and Current Labor Market and Job Training Initiatives

MD Labor's Labor Exchange Administrators (LEAs) will work directly with the SCSEP staff to analyze current labor market in each of the respective counties. LEAs will increase the SCSEP staff's program knowledge about MD Labor's initiatives such as Apprenticeship, EARN Maryland, Wagner-Peyser, and other WIOA Programs. The goal is for the SCSEP staff to learn how to assess the participants' needs and select the right job training initiative.

The SCSEP staff will regularly attend the local staff meetings to share job leads and potential participants actively seeking jobs.

(E)Actions to ensure that SCSEP is an active partner in the AJC delivery system and the steps the state will take to encourage and improve coordination with the AJC delivery system. (20 CFR 641.335)

SCSEP and Maryland's AJC Service Delivery System

SCSEP remains a partner under WIOA and is a viable part of the AJC delivery system. The MD SCSEP staff, who are co-located in the AJCs, will continue to provide the career services, including determination of eligibility; outreach, intake, and orientation; initial assessment of skills, aptitudes, abilities, and supportive service needs; and job search and job placement.

On a regular basis, MD SCSEP will encourage and improve coordination in the AJC delivery system in the following ways:

- Identify and collaborate with workforce development professionals who can assist with Title III service delivery and other employment-related services, training referrals, job openings, resume writing, mock interviews, and career counseling.
- Screen and inform all new SCSEP applicants and current participants about MD Labor's Adult Learning and Literacy Services (AELS). The Office of Adult Learning helps Maryland adults who lack a high school diploma; who lack basic reading, writing, and mathematical skills; and/or who do not speak English as their first language.

- Register new applicants and participants in MWE and case manage applicants and participants progress using MWE.
- Partner with the Business Service Representatives in the AJCs to conduct outreach to local businesses to promote the program and the current participants.

(F) Efforts to work with local economic development offices in rural locations.

Efforts The State Will Make to Work with Local Economic Development Offices in Rural Locations

MD SCSEP continues to improve service delivery in rural areas. To further support local economic development in those areas, MD SCSEP will utilize program and participant staff to join local leaders in informing the business community of human capital and job training resources. MD SCSEP will also advocate for the expansion of support services in transportation to specifically connect older workers residing in rural areas with local employment opportunities. Coordination with other OOA programs will ensure that MD SCSEP maintains and expands the presence as an employment related service provider in rural areas. Where feasible, MD SCSEP will seek to be the employment partner of choice for businesses as well as older workers in rural Maryland.

(2) The state's long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants in unsubsidized employment. (20 CFR 641.302(e)) (May alternatively be discussed in the state strategies section of strategic plan.)

Long-term Strategies for Unsubsidized Employer Engagement for SCSEP in Maryland

MD Labor will make SCSEP participants a part of their pipeline of talent identified by business services staff. Business services staff will be trained to understand the program and participants as potential candidates for openings.

MD SCSEP will also continue to cultivate and grow relationships with host agency partners who have demonstrated their commitment to employing older workers by hiring SCSEP participants. Proper exit and follow-up procedures are critical to this area of employer engagement and will be measured as a job performance standard of MD SCSEP staff. The program aims to develop an internal network of training and job referral completely comprised of proven hiring and training partners. These partners will assist MD SCSEP in advocating for older workers as viable human capital for Maryland businesses and agencies, and the program will rely on them to increase host agency, training partner, and employer recruitment and retention.

Senior Service America, Inc. (SSAI) Long-Term Strategy for Engaging Employers

Senior Service America's, Inc. (SSAI's) sub grantees have well-established partnerships with local Chambers of Commerce. Sub grantees often attend meetings in order to network with local business representatives. Through training provided by SSAI, sub grantees regularly get on a Chamber's agenda to engage employers by promoting both SCSEP and job ready participants.

To promote employer outreach, in attention to the AJCs, SSAI Program Officers also work with sub grantees to identify other employer organizations in order to increase the visibility of SCSEP. For example, SSAI promotes subgrantee engagement with local chapters of the Society for Human Resource Management (SHRM), a professional association of human resources professionals from various employers. These professionals are usually involved with hiring and tend to be focused on ensuring a diverse workforce, including mature workers. In addition, many of these SHRM chapters have a committee of volunteers willing to give their time to nonprofits. They can be a great resource for educating participants about what their companies look for in a new employee, helping prepare for interviews, and writing résumés that will get read.

Other SSAI employer outreach training focuses on showing sub grantees how to approach the hidden job market by establishing relationships with their local, county, and state economic development councils and accessing their press releases of future or growing business announcements. SSAI staff trains sub grantees to approach these employers with the goal of establishing relationships as business partners. Job Development training of sub grantees will remain multi-focused. One area of focus will be to continue to promote the identification and targeting of local employers by using the internet, especially in rural areas. Another focus will be on the basics of how to conduct employer outreach. The training to be provided includes group activities, role playing, and videos about job development. Another area of focus will be to provide technical assistance geared towards developing advanced networking skills of both sub grantees and SCSEP participants.

Furthermore, as MD SCSEP increases employer engagement, SSAI will also increase exploration of on-the-job-experience (OJE) as a method of expanding employer engagement. While OJE has not been widely utilized by the sub grantees in the past, the Program Officers will actively promote OJE as a tool for sub grantees to use in future PYs to gain more unsubsidized jobs for participant job seekers.

Source: Senior Service America, Inc.

SSAI's Strategies for Preparing Participants for Unsubsidized Jobs

SSAI's Program Officers will further expand sub grantees capabilities to use a multi-pronged approach to prepare participants for unsubsidized jobs. SSAI Program Officers develop turnkey tools that a subgrantee may use when meeting with participants. For example, a presentation has been developed on how to navigate a job fair that a subgrantee can deliver at a participant meeting. Additionally, Program Officers provide sample agendas and activities as well as facilitate job club meetings at subgrantee locations. Program Officers are often asked to present at participant meetings. Topics may vary and can include interviewing techniques, résumé writing tips, approaching the hidden job market, using social media in a job search, and completing online job applications.

Source: Senior Service America, Inc.

(3) The state's long-term strategy for serving minority older individuals under SCSEP. (20 CFR 641.302 (c))

The Long-term Strategy for Serving Minorities under MD SCSEP

Service to minorities under SCSEP is measured annually by USDOL. The Service to Minorities data report helps guide and inform efforts to engage diverse low-income seniors in job training activities. The analysis in the most recent Service to Minorities reports (Volume I and II) released on April 25, 2017 highlighted gaps by MD SCSEP as well as SSAI's SCSEP in MD to reach Asian and the Hispanic populations.

Maryland state grantee enrollment levels for Asians, and individuals with two or more races have remained unchanged from Program Year 2016 to Program Year 2018. On the other hand, there has been a slight decrease in enrollment of American Indians. Black and White Americans comprise the majority of the participant trainees in both program years. Of all the race groups, Black Americans are enrolled at a higher percentage and White Americans are the second highest group to be enrolled in MD SCSEP as shown in the following table.

Table: Enrollment by Race/Ethnicity

Race/Ethnicity	***PY 2017 YTD No.**	***PY 2017 YTD %**	****** PY 2018 YTD No.**	****** PY 2018 YTD%**
American Indian or Alaska Native	3	2%	0	0%
Asian	0	0%	0	0%
Black or African American	66	-55%	61	- 56%
Hispanic, Latino or Spanish Origin	2	2%	1	- 1%
Native Hawaiian or Pacific Islander	1	1%	1	1%
White	50	41%	40	37%
Two or More Races	0	0%	0	0%

Source: *SPARQ - Final PY 2017 Final End of Year - SCSEP Quarterly Progress Report
**SPARQ - Final PY 2017 3rd Quarter - SCSEP Quarterly Progress Report

Based on the 2010-2015 American Community Service (ACS) data set, overall the entire State of Maryland consisted of 59.6 percent White alone, 30.5 percent Black Alone, 9.5 percent Hispanic or Latino, 6.5 percent Asian alone, 2.7 percent two or more races, 0.6 percent American Indian alone, and 0.1 percent Native Hawaiian or Pacific Islander alone in descending order. The low enrollment of American Indians, Asians, Hispanics, Native Hawaiians, and individuals with two or more race in the MD SCSEP is in direct proportion with the total county population percentage by race/ethnicity in 2018 as shown in the following table.

Table: Total County Population Percentage by Race/Ethnicity, 2018

County	American Indian or Alaska Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian or Pacific Islander	White	Two or More Race
Allegany	0.2%	1.1%	8.1%	1.8%	0.1%	8.5%	2.0%
Anne Arundel	0.3%	3.4%	15.5%	6.1%	0.1%	75.4%	2.9%
Baltimore City	0.1%	2.8%	63%	- 5.3%	0.1%	1.6%	2.1%
Baltimore County	0.3%	5.0%	26.1%	4.2%	0.0%	64.6%	2.4%
Calvert	0.4%	1.8%	13.2%	4.0%	0.1%	1.0%	2.5%
Caroline	0.9%	1.2%	14%	8.0%	0.3%	81.3%	2.3%
Carroll	0.2%	1.4%	3.2%	2.6%	0.0%	92.9%	1.5%
Cecil	0.3%	1.1%	6.2%	3.4%	0.0%	89.2%	2.2%
Charles	0.8%	3.4%	47.5%	5.8%	0.1%	44.3%	3.9%
Dorchester	0.3%	0.9%	27.7%	3.5%	0.0%	67.6%	1.9%
Frederick	0.3%	3.8%	8.6%	7.3%	0.0%	81.5%	2.8%
Garrett	0.2%	0.4%	1.0%	1.2%	0.0%	97.5%	0.9%
Harford	0.3%	2.4%	12.7%	3.5%	0.1%	81.2%	2.5%
Howard	0.3%	14.4%	17.5%	5.8%	0.0%	62.2%	1.7%
Kent	0.3%	1.2%	15.0%	4.3%	0.1%	1.5%	1.9%
Montgomery	0.4%	13.9%	17.2%	17%	0.1%	57.5%	4.0%
Prince George's	0.5%	4.1%	64.5%	14.9%	0.1%	19.2%	3.2%
Queen Anne's	0.5%	1.2%	6.6%	4.0%	0.1%	9.6%	2.1%
Somerset	0.3%	0.7%	42.3%	3.3%	0.0%	53.5%	1.7%
St. Mary's	0.4%	2.9%	14.6%	5.2%	0.1%	8.5%	3.5%
Talbot	0.4%	1.5%	12.7%	7.1%	0.2%	3.5%	1.8%
Washington	0.3%	1.9%	11.7%	5.0%	0.1%	3.0%	2.9%
Wicomico	0.2%	2.5%	24.2%	4.5%	0.0%	68.7%	2.5%
Worcester	0.3%	1.1%	13.6%	3.2%	0.0%	82%	1.7%

Source: U.S. Census Bureau American FactFinder

For a comparison analysis of race and ethnicity for the state of Maryland versus the National Grantees, SSAI's and the state grantees, see the following tables.

Table: American Indian Grantees

	SCSEP Percent American Indian	Census Percent American Indian	*Percent Difference	Less Than 80%	Significant (P<=.05)	Less Than 80%, Sig
National Grantees	2.3%	0.9%	255.6%	2	1	1
SSAI (MD National Grantee)	1.6%	0.8%	200.0%	0	0	0
State Grantees	2.4%	2.0%	120.0%	7	4	4
Maryland State Grantee	2.5%	0.4%	N/A	N/A	N/A	N/A

Source: Senior Community Service Employment Program, Analysis of Service to Minority Individuals, PY 2017, Volume I and Volume II.

Table: Asian Grantees

	SCSEP Percent Asian	Census Percent Asian	*Percent Difference	Less Than 80%	Significant (P<=.05)	Less Than 80%, Sig
National Grantees	3.4%	3.0%	113.3%	17	16	16
SSAI (MD National Grantee)	3.9%	3.6%	108.3%	0	0	0
State Grantees	2.0%	4.9%	40.8%	41	32	32
Maryland State Grantee	0.0%	1.0%	0.0%	1	1	1

Source: Senior Community Service Employment Program, Analysis of Service to Minority Individuals, PY 2017, Volume I and Volume II.

Table: Black Grantees

	SCSEP Percent Black	Census Percent Black	*Percent Difference	Less Than 80%	Significant (P<=.05)	Less Than 80%, Sig
National Grantees	42.0%	17.5%	240.0%	1	1	1
SSAI (MD National Grantee)	45.3%	20.7%	218.8%	0	0	0
State Grantees	39.1%	16.4%	238.4%	2	2	2
Maryland State Grantee	54.5%	37.9%	143.8%	0	0	0

Source: Senior Community Service Employment Program, Analysis of Service to Minority Individuals, PY 2017 Volume I and Volume II.

Table: Hispanic Grantees

	SCSEP Percent Hispanic	Census Percent Hispanic	*Percent Difference	Less Than 80%	Significant (P<=.05)	Less Than 80%, Sig
National Grantees	12.2%	9.9%	123.2%	12	12	11
SSAI (MD National Grantee)	4.3%	7.3%	58.9%	1	1	1
State Grantees	10.6%	13.3%	79.7%	24	19	17
Maryland State Grantee	1.7%	1.9%	89.5%	0	0	0

Source: Senior Community Service Employment Program, Analysis of Service to Minority Individuals, PY 201 7, Volume I and Volume II.

Table: Pacific Islander Grantees

	SCSEP Percent Pacific Islander	Census Percent Pacific Islander	*Percent Difference	Less Than 80%	Significant (P<=.05)	Less Than 80%, Sig
National Grantees	0.20%	0.10%	N/A	N/A	N/A	N/A
SSAI (MD National Grantee)	0.10%	0.00%	NA	NA	NA	NA
State Grantees	0.40%	0.30%	N/A	1	1	1
Maryland State Grantee	0.80%	0.00%	NA	NA	NA	NA

Source: Senior Community Service Employment Program, Analysis of Service to Minority Individuals, PY 2017, Volume I and Volume II.

Factors in SCSEP Employment Outcomes

The SCSEP Analysis of Service to Minority Individuals, PY2017 (Preliminary, Volume II) analyzed the employment outcomes achieved by SCSEP minority participants in PY2017. In the tables 8-10 below, the analysis reviewed the common measures, entered employment, employment retention and average earnings between various race groups.

Table: Common Measures Entered Employment: Race

Maryland	American Indian	Asian	Black	Pacific Islander	White
Employed	50.0%	0%	13.9%	0%	40.9%
Unemployed	50.0%	0%	86.1%	0%	59.1%

Table: Common Measures Employment Retention: Race

Maryland	American Indian	Asian	Black	Pacific Islander	White
Retained	0.0%	0.0%	71.4%	0%	75.0%
Not Retained	0.0%	0.0%	28.6%	0%	25.0%

Table: Common Measures Average Earnings: Race

Maryland	Black	White
Average Earnings	6110.20	6226.50

Based on this analysis, White and American Indian Natives entered employment more often than Asians, Blacks and Pacific Islanders. Whites and Blacks retained employment and have higher average earnings than other race groups.

Steps to address under-service or disparities

One of the key finds in this Service to Minority Report for both MD SCSEP and SSAI SCSEP is there are gaps in the program to reach American Indian, Asian, Hispanic, Native Hawaiian and individuals who identify with two or more races. In response, both MD SCSEP and SSAI SCSEP will increase efforts to target these populations. The local MD SCSEP staff will use faith based and social organizations as recruitment sources since minority groups who experience a language barrier often look to these organizations to connect with people of similar backgrounds.

The State of Maryland grantee will identify and target community organizations with demonstrated expertise in serving minorities and individuals with LEP. Specifically, targeting these organizations will expand the availability of training options for older adults who experience LEP as a barrier to employment. The Labor Exchange Administrators will help the program operators to identify and build partnerships with community leaders and organizations that are known and trusted by members of underserved communities. These organizations can then assist and support the program operators' targeted recruitment efforts.

Source: Grant Application - Minority Report

(4) A list of community services that are needed and the places where these services are most needed. Specifically, the plan must address the needs and location of those individuals most in need of community services and the groups working to meet their needs. (20 CFR 641.330)

Exact Placement of Most Needed Community Services

Community services that support employment activity continue to be of critical need to the MD SCSEP service area. The most needed community support service throughout the MD SCSEP service area is for transportation. While Baltimore City MD SCSEP participants experience a variety of public and private transportation options, many low-income seniors residing in the

remaining areas do have access to a regional interconnected transportation system. MD SCSEP participants experience a limitation in training options and future placement due to unmet transportation needs in the community.

Other services that are needed throughout the service area, based on United Way and other area needs assessments, include: the availability of fresh, affordable food; access to affordable and accessible healthcare; the availability of food service to persons who are homebound or limited mobility; the availability of affordable housing for seniors; the availability of postsecondary training options, e.g. certification and community college programs; and the availability of programs to support literacy and English proficiency. These services are needed in all 11 counties in the MD SCSEP service area. In Baltimore City, the primary need is affordable senior housing in lieu of the established transportation resources.

(5) The state's long-term strategy to improve SCSEP services, including planned long-term changes to the design of the program within the state, and planned changes in the use of SCSEP grantees and program operators to better achieve the goals of the program. This may include recommendations to the Department as appropriate. (20 CFR 641.302(k))

Long-term Strategies to Improve MD SCSEP Services, including Planned Long-term Changes to the Design of the Program with the State

The State's long-term strategy to improve its MD SCSEP services is to integrate the program into MD Labor's workforce delivery system. New applicants interested in the program are oriented to the AJC and become job seekers immediately. SCSEP participants have access to Job Service Specialists to help them find employment and assist participants to access necessary services to move the recipient to unsubsidized employment.

The LEAs will oversee the local programs and staff to ensure integration occurs. The Employment Specialists will report directly to the LEAs or the Job Service Supervisors. The SCSEP Program Manager will monitor and provide technical assistance to the local SCSEP team to ensure they meet and exceed federal requirements. The SCSEP Program Manager will also ensure that all current participants in the program rotate after one year in a training assignment.

SCSEP concentrated on the intake (participant onboarding), participant departures, and host agency re-certification processes. Each of these processes were mapped out and a standardized process was developed for all SCSEP staff. The state developed one standardize process for all work processes with the goal of improving work efficiency.

Mostly with partnerships with local WIOA programs, SCSEP will continue to better align with community colleges to expand training opportunities for older workers throughout the service area. WIOA partners have an ongoing partnership with the local community colleges and SCSEP will encourage participants to enroll in classes through WIOA. If WIOA eligible, then WIOA will pay for the class.

The Maryland SCSEP program will continuously assess ways to improve SCSEP service delivery including measuring the effectiveness of staff, quality of host agency partnerships and training

outcomes, and placement performance. Semi-annually, Maryland staff are regularly evaluated on their work performance in accordance with the standards of their agency as well as in relation to program performance goals as articulated by USDOL. MD Labor and SSAI are exploring and will continually to explore ways that they can share resources to benefit local programs where program location is feasible. MD Labor is in the process of exploring additional workshops and resources on a local level such as "Dress for Success", that might assist participants.

Further, MD SCSEP will continue to explore coordinating a combined employer engagement initiative with SSAI to highlight SCSEP operations in Maryland. The goal of this initiative is to ensure that both SCSEP grants in Maryland meet the "entered employment" performance goal annually in every jurisdiction in the state.

(6) The state's strategy for continuous improvement in the level of performance for SCSEP participants' entry into unsubsidized employment, and to achieve, at a minimum, the levels specified in OAA Section 513(a)(2)(E)(ii). (20 CFR 641.302(f))

In 2016, Congress amended the Older American Act giving new performance measures to SCSEP. In PY20-24, both the MD and SSAI SCSEP will continue to use existing, effective strategies to meet the performance targets for service level, most-in-need, and community service hours. Below is a chart of the strategies that MDS and SSAI SCSEP will utilize to meet the following new SCSEP performance measures:

- The percentage of project participants who are in unsubsidized employment during the second quarter after exit from the project. Strategies:
    - Both MD and SSAI SCSEP will focus on developing robust follow-up systems for connecting with exited participants to collect this performance data until such time as MD Labor succeeds in providing access to UI records to SCSEP providers.
    - To ensure the ability to contact participants after exit, both SCSEP programs will collect release forms from participants at initial orientation.
- The median earnings of project participants who are in unsubsidized employment during the second quarter after exit from the project. Strategies:
    - Both MD and SSAI SCSEP will focus on developing robust follow-up systems for connecting with exited participants to collect this performance data until such time as MD Labor succeeds in providing access to UI records to SCSEP providers.
    - To ensure the ability to contact participants after exit, both SCSEP programs will collect release forms from participants at initial orientation.
    - Both SCSEP programs will continue to build their relationships with employers as a means of increasing their ability to collect earnings data from employers, in addition to following-up with exited participants.
- The percentage of project participants who are in unsubsidized employment during the 4th quarter after exit from the project. Strategies:
    - Both MD and SSAI SCSEP will focus on developing robust follow-up systems for connecting with exited participants to collect this performance data until such time as MD Labor succeeds in providing access to UI records to SCSEP providers.
    - To ensure the ability to contact participants after exit, both SCSEP programs will collect release forms from participants at initial orientation.

    - Both SCSEP programs recognize that this measure is applicable to all participants who have exited SCSEP, not just those that exited for unsubsidized employment. Without access to UI data, successful attainment of this measure will mean that both programs develop follow-up contact touch points at regular intervals with exiters prior to the 4th quarter after exit.
- Effectiveness in serving participants. Strategy:
    - Both SCSEP programs in MD will implement the established annual participant satisfaction survey process to attain this goal.
- Effectiveness in serving host agencies. Strategy:
    - Both SCSEP programs in MD will implement the established MD Labor host agency satisfaction survey process to attain this goal.
- Effectiveness in serving participants. Strategy:
    - Both SCSEP programs in MD will implement the established MD Labor Employer Satisfaction survey process to attain this goal.
- Effectiveness in customer satisfaction. Strategy:
    - Both SCSEP programs in MD will strive to improve customer satisfaction including participants and host agencies by consulting with other State and National grantees on their best practices

Strategies for Continuous Improvement in Unsubsidized Placement Performance for MD SCSEP Participants

To maximize a participant's opportunity to enter into unsubsidized employment, MD SCSEP intends to implement several strategies to improve placement performance, including:

- Educate and empower host agencies to value older workers and where possible, hire MD SCSEP participants;
- Encourage MD SCSEP participants to pursue and participate in community college courses and/or certificate training programs;
- Provide programmatic information sessions for local businesses and potential employers to increase awareness of the MD SCSEP brand in the counties within the service area; and
- Charge local MD SCSEP staff with cultivating relationships with local businesses as potential OJE partners in each jurisdiction.

(c) Location and Population Served, including Equitable Distribution

Section 3: Location and Population Served, including Equitable Distribution

Maryland is a unique state comprised of 23 counties and the City of Baltimore, bordering the District of Columbia, Delaware, Pennsylvania, and Virginia. The majority of Maryland's population is concentrated in the cities and suburbs surrounding Washington, D.C., and Maryland's most populous city, Baltimore.

Every PY, USDOL employs a formula to determine the number of SCSEP participant slots to be awarded to a state or national grantee, by county and by population distributed over urban and rural areas of a particular state. That number seeks to provide the grantee with a balanced number

of slots for participation in areas that are defined as urban or rural by the United States Census. "Equitable Distribution" refers to the grantees' ability to administer SCSEP fairly and equitably amongst older workers residing in urban and rural zip codes within their service area over the duration of the PY.

(1) A description of the localities and populations for which projects of the type authorized by title V are most needed. (20 CFR 641.325 (d))

The Localities and Populations for which Projects, authorized by Title V, are most Needed

The MD Labor oversees and administers the SCSEP for the following counties: Baltimore City, Allegany, Garrett, Washington, Charles, Calvert, St. Mary's, Caroline, Kent, Talbot, and Queen Anne's counties. This territory stretches from the mountainous western edge of the state (Allegany, Garrett, and Washington counties), bordering Pennsylvania, Virginia, and West Virginia, through north central Maryland (Baltimore City) onto Southern Maryland (Calvert, Charles, and St. Mary's counties) and the Eastern Shore (Caroline, Kent, Queen Anne's, and Talbot counties).

The population that benefits from MD SCSEP are individuals 55 years and older who are unemployed, low-income, disabled, severely disabled, frail, veterans, homeless or at risk of homelessness, and individuals who possess LEP, low literacy skills, and who live in an area of persistent unemployment.

(2) List the cities and counties where the project will be conducted. Include the number of SCSEP authorized positions and indicate where the positions changed from the prior year.

Table: State Grantee & National Grantee Authorized Position by County: State Grantee Authorized Positions

County	PY17	PY18	PY17 – PY18 Change
Allegany	13	13	0
Anne Arundel	38	38	0
Baltimore County	0	0	0
Baltimore City	38	39	-1
Calvert	5	5	0
Caroline	4	4	0
Carroll	14	10	-4
Cecil	0	0	0
Charles	11	11	0
Dorchester	0	0	0
Frederick	0	0	0
Garrett	5	5	0
Harford	0	0	0
Howard	0	0	0
Kent	2	3	-1

County	PY17	PY18	PY17 – PY18 Change
Montgomery	0	0	0
Prince George's	0	0	0
Queen Anne's	4	4	0
St. Mary's	7	7	0
Somerset	0	0	0
Talbot	6	5	-1
Washington	17	17	0
Wicomico	0	0	0
Worcester	0	0	0

The total PY17 – PY18 Change for State grantee authorized position is -6.

Table: National Grantee Authorized Positions

County	PY16	PY17	PY16 – PY17 Change
Allegany	0	0	0
Anne Arundel	0	0	0
Baltimore County	94	81	-13
Baltimore City	110	91	-19
Calvert	0	0	0
Caroline	0	0	0
Carroll	0	0	0
Cecil	12	11	-1
Charles	0	0	0
Dorchester	6	5	-1
Frederick	14	16	2
Garrett	0	0	0
Harford	19	18	-1
Howard	17	14	-3
Kent	0	0	0
Montgomery	68	70	2
Prince George's	59	60	1
Queen Anne's	0	0	0
St. Mary's	0	0	0
Somerset	5	5	0
Talbot	0	0	0
Washington	0	0	0
Wicomico	14	12	-2
Worcester	9	7	-2
Total	427	390	-63

The table above illustrates the reduction in the total authorized positions in Maryland as a result of Congressional budget cuts to SCSEP for the program year starting on July 1, 2017.

(3) Describe current slot imbalances and proposed steps to correct inequities to achieve equitable distribution.

Current Slot Imbalances and Proposed Steps to Ensure Equity

To monitor and correct inequities on an ongoing basis, both MD SCSEP and SSAI will implement the following strategies on behalf of achieving equitable distribution for all statewide SCSEP positions:

Use USDOL "Tables by State" from www.scseped.org to regularly check equity status focusing on addressing counties that are under equity by 50 percent or move and over equity by 150 percent or more. Where counties are under equity, both MD SCSEP and SSAI will focus project staff to enroll being mindful of the SCSEP priorities of service. Where counties are over equity, both MD SCSEP and SSAI will focus their respective project staff to curtail enrollment, and focus on exiting participants into unsubsidized placement to bring equity into alignment.
If appropriate both programs will strategize and maximize opportunities to collaborate effectively on the transfer of positions where such an action will put both grantees on track to achieve equitable distribution with the least disruption to the participant.

Table: PY18 Q3 Maryland Equitable Distribution Status

FIPS	County	No. of MD SCSEP Modified Positions	No. of MD SCSEP Current Enrollments	MD SCSEP Variance	No. of SSAI Modified Positions	No. of SSAI Current Enrollments	SSAI Variance
24001	Allegany	9	13	4 (44%)	-	-	-
24003	Anne Arundel	-	-	-	27	13	-14 (-52%)
24005	Baltimore City	-	-	-	-	-	-
24009	Calvert	4	2	-2 (50%)	-	-	-
24011	Caroline	3	2	-1 (-33%)	-	-	-
24013	Carroll	-	-	-	7	3	-4 (-57%)
24015	Cecil	-	-	-	8	16	8 (200%)
24019	Dorchester	-	-	-	-	-	-
24021	Frederick	-	-	-	12	5	-7 (-58%)
24023	Garrett	4	5	1 (25%)	-	-	-
24025	Harford	-	-	-	13	4	-9 (-69%)
24027	Howard	-	-	-	10	5	-5 (-50%)
24029	Kent	2	2	0 (0%)	-	-	-
24031	Montgomery	-	-	-	-	-	-
24033	Prince George's	-	-	-	-	-	-
24035	Queen Anne's	3	3	0 (0%)	-	-	-

FIPS	County	No. of MD SCSEP Modified Positions	No. of MD SCSEP Current Enrollments	MD SCSEP Variance	No. of SSAI Modified Positions	No. of SSAI Current Enrollments	SSAI Variance
24037	St. Mary's	5	4	-1 (-20%)	-	-	-
24039	Somerset	-	-	-	4	2	-2 (-50%)
24041	Talbot	4	4	0 (0%)	-	-	-
24043	Washington	12	16	4 (33%)	-	-	-
24045	Wicomico	-	-	-	-	-	-
24047	Worchester	-	-	-	5	1	-4 (-80%)
24510	Baltimore City	28	3	-25 (-89%)	-	-	-

For PY19, MD SCSEP will constantly refer to the Equitable Distribution Report and closely monitor the equitable distribution throughout the State. The report will be shared with the LEAs, Employment Specialists, and SSAI sub grantees. MD SCSEP will continue to participate in SCSEP Sponsors Meeting with SSAI and to discuss best practices for improving equitable distribution.

For the Maryland counties that are significantly under service, recruitment efforts will be concentrated on community groups and social nonprofit organizations to identify potential participants. Both programs will reemphasize the importance of equity with the number of modified positions per county and provide the necessary training. Training will be conducted on an individual basis and on a group basis.

(4) The state's long-term strategy for achieving an equitable distribution of SCSEP positions within the state that:
(A) Moves positions from over-served to underserved locations within the state in compliance with 20 CFR 641.365.
(B) Equitably serves rural and urban areas.
(C) Serves individuals afforded priority for service under 20 CFR 641.520. (20 CFR 641.302(a), 641.365, 641.520)

The State's Long-term Strategy for Achieving an Equitable Distribution of MD SCSEP Positions within the State

To monitor and correct inequities on an ongoing basis, MD SCSEP and SSAI will implement the following strategies:

Prepare and review EDR quarterly and discuss variances with LEAs, Employment Specialists, and sub grantees during quarterly conference calls and meetings.
Review EDR semi-annually and develop strategies needed to achieve equitable distribution.
Monitor local equity distribution status using a variance measurement of +/- 50 percent. SCSEP local staff and sub grantees will be informed of their current status and provided technical assistance to ensure that they serve the appropriate number of authorized positions per county by the end of each PY.

(5) The ratio of eligible individuals in each service area to the total eligible population in the state. (20 CFR 641.325(a))

Ratio of Eligible Individuals in Each Service Area to Total Eligible Population in the state

The estimated population for the state of Maryland in in 2019 is 6.11 million.

Table: Limited Maryland Population and Poverty Chart, by county

County	Total Estimate County Population (2018 year Population Estimate)	Total Estimate Male 65 years and older	Total Estimate Female 65 years and older	Total Estimate 55 to 59 years	Total Estimate 60-64 years	Total Estimate 65-69 years	Total Estimate 70 -74 years	Total Estimate 75-79 years
Allegany	70,975	1,959	2,133	4,770	4,626	4,092	3,687	2,758
Anne Arundel	576,031	12,845	14,767	41,285	35,320	35,320	22,718	15,491
Baltimore County	828,431	20,339	24,711	58,482	55,356	4,505	34,359	23,611
Calvert	92,003	2,223	2,275	7, 760	6,176	4,498	3,724	2,481
Caroline	33,304	803	922	2,520	2,299	1,725	1,463	990
Cecil	102,826	2,699	2,964	8,112	7,143	5,663	4,383	2,807
Charles	161,565	3,188	3,808	12,153	9,320	6,996	5,352	3,625
Dorchester	31,998	983	1,149	2,520	2,459	2,132	1,833	1,287
Frederick	255,648	5,806	6,404	19,001	15,604	12,210	9,574	6,432
Garrett	29,163	990	1,024	2,346	2,339	2,014	1,759	1,226
Harford	253,956	6, 408	7,159	19,620	16,887	13,567	10,930	7,504
Howard	323,196	7,142	7,949	23,086	19,119	15,091	12,188	7,943
Kent	19,383	653	770	1,495	1,515	1,423	1,380	1,026
Montgomery	1,052,567	24,183	28,317	72,809	65,294	52,500	40,161	27,871
Prince George's	909,308	19,070	25,198	63,955	54,097	44,268	31,714	20,482
Queen Anne's	50,251	1,439	1,475	4,211	3,693	2,914	2,705	1,889
Somerset	25,675	737	738	1,737	1,635	1,475	1,050	761
St. Mary's	112,664	2,305	2,589	8,231	6,456	4,894	3,844	2,675
Talbot	36,968	1,253	1,613	2,803	2,924	2,866	2,761	2,242
Washington	150,926	3,883	4,233	10,660	9,638	8,166	6,402	4,662
Wicomico	103,195	2,485	2,800	6,602	6,498	5,285	4,333	2,979
Worcester	51,823	1,999	2,230	4,170	4,186	4,229	3,879	2,756
Baltimore City	602,495	12,928	16,752	40,008	36,520	29,680	20,556	14,128

Source: American Community Survey 5-Year Estimates, U.S. Census Bureau

Table: Total Estimate 65 years and older less than 150 percent of poverty level

Counties	65+	< 150% of poverty level
Anne Arundel County	83,933	8,249

Counties	65+	< 150% of poverty level
Baltimore City	84,337	23,240
Baltimore County	141,770	19,443
Frederick County	36,849	3,363
Lower Shore	34,938	5,021
Mid-Maryland	72,366	6,438
Montgomery County	164,153	17,089
Prince George's County	119,595	14,854
Southern Maryland	48,413	6,607
Susquehanna	57,961	6,303
Upper Shore	38,155	5,382
Western MD	46,764	7,913

The general population of Maryland has increased at a rate of nine percent since 2000. However, the applicable minimum wage has increased in the state since 2018. This has caused a decrease in the number of positions allocated to the state SCSEP program. It has also caused an increase in the number of potential seniors residing in the service area that may be qualified to participate. This creates difficulty in finding adequate placement partners for training and supportive services. These realities demonstrate the need for services under the MD SCSEP program. Conversely, they also reflect widening gaps in the only federally-funded employment safety net designed for low income older Marylanders.

(6) The relative distribution of eligible individuals who:
(A) Reside in urban and rural areas within the state
(B) Have the greatest economic need
(C) Are minorities
(D) Are LEP
(E) Have the greatest social need. (20 CFR 641.325(b))

Table: Distribution of Individuals within MD SCSEP Service Area

Counties	Population Estimates	Urban /Rural	Persons in Poverty	Minorities,%	Language other than English spoken at home (LEP)
Allegany	72,952	Rural	18.5 %	8.2% Black 0.2% American Indian 1.0% Asian 0.1% Native Hawaiian 1.6% Hispanic/Latino	4.7%
Anne Arundel	550,269	Urban	5.9%	15.7 Black 0.2% America Indian 3.5% Asian 0.1% Native Hawaiian 6.7% Hispanic Latino	10.7%

Counties	Population Estimates	Urban /Rural	Persons in Poverty	Minorities,%	Language other than English spoken at home (LEP)
Baltimore County	817,720	Urban	9.1%	26.8% Black 0.2% American Indian 5.4% Asian 0.0% Native Hawaiian 4.6% Hispanic Latino	13.9%
Baltimore City	622,793	Urban	24.2%	63.7% Black 0.4% American Indian 2.3% Asian 0.0% Native Hawaiian 4.2% Hispanic/Latino	8.8%
Calvert	90,613	Urban	7.2%	13.2% Black 0.4% American Indian 1.7% Asian 0.1% Native Hawaiian 3.5% Hispanic/Latino	4.3%
Caroline	32,538	Urban	16.0%	14.3% Black 0.8% American Indian 1.0% Asian 0.4% Native Hawaiian	6.2%
Carroll	167,39	Urban	5.5%	3.2% Black 0.2% American Indian 1.6% Asian 0.0% Native Hawaiian 2.8% Hispanic Latino	6.2%
Charles	154,747	Urban/ Rural	7.2%	43.8% Black 0.8% American Indian 3.3% Asian 0.1% Native Hawaiian 5.3% Hispanic/Latino	7.2%
Dorchester	32,614	Urban	16.9%	28.9% Black 0.1% American Indian 1.2% Asian 0.0% Native Hawaiian 2.3% Hispanic/Latino	5.7%
Frederick	239,253	Urban	6.2%	8.7% Black 0.4% American Indian 4.2% Asian 0.1% Native Hawaiian 7.9% Hispanic/Latino	12.6%

Counties	Population Estimates	Urban /Rural	Persons in Poverty	Minorities,%	Language other than English spoken at home (LEP)
Garrett	29,679	Rural	12.4%	1.1% Black 0.1% American Indian 0.5% Asian 0.0% Native Hawaiian 1.0% Hispanic/Latino	4.6%
Harford	248,029	Urban	7.7%	13.2% Black 0.2% American Indian 2.6% Asian 0.0% Native Hawaiian 3.9% Hispanic/Latino	6.9%
Howard	299,269	Urban	5.1%	18.1% Black 0.2% American Indian 15.6% Asian 0.0% Native Hawaiian 6.1% Hispanic/Latino	24.1%
Kent	19,820	Rural	13.8%	15.1% Black 0.3% American Indian 1.0% Asian 0.1% Native Hawaiian 4.3% Hispanic/Latino	5.3%
Montgomery	1,005,087	Urban	6.9%	17.4% Black 0.3% American Indian 14.3% Asian 0.0% Native Hawaiian 17.9% Hispanic/Latino	39.8%
Prince George's	684,764	Urban	9.7%	63.8% Black 0.3% American Indian 4.3% Asian 0.0% Native Hawaiian 15.9% Hispanic/Latino	23.3%
Queen Anne's	48,804	Rural	7.5%	6.9% Black 0.4% American Indian 1.1% Asian 0.0% Native Hawaiian 3.4% Hispanic/Latino	5.3%

Counties	Population Estimates	Urban /Rural	Persons in Poverty	Minorities,%	Language other than English spoken at home (LEP)
St. Mary's	110,382	Rural	8.6%	14.5% Black 0.4% American Indian 2.8% Asian 0.1% Native Hawaiian 3.8% Hispanic/Latino	7.0%
Somerset	26,197	Urban	23.7%	41.6% Black 0.2% American Indian 1.2% Asian 0.0% Native Hawaiian 3.6% Hispanic/Latino	7.4%
Talbot	37,643	Rural	11.7%	13.2% Black 0.3% American Indian 1.5% Asian 0.2% Native Hawaiian 6.3% Hispanic/Latino	8.0%
Washington	149,573	Urban	13.8%	10.9% Black 0.3% American Indian 1.7% Asian 0.1% Native Hawaiian 4.3% Hispanic/Latino	6.9%
Wicomico	100,376	Urban	17.4%	24.3% Black 0.3% American Indian 2.9% Asian 0.0% Native Hawaiian 4.9% Hispanic/Latino	10.9%
Worchester	51,558	Urban	24.2%	14.35% Black 0.1% American Indian 1.2% Asian 0.1% Native Hawaiian 3.3% Hispanic Latino	5.2%

Source: U.S. Census Bureau 7-2014

(7) A description of the steps taken to avoid disruptions to the greatest extent possible, when positions are redistributed, as provided in 20 CFR 641.365; when new Census or other reliable data become available; or when there is over-enrollment for any other reason. (20 CFR 641.325(i), 641.302(b))

Avoiding Disruptions to SCSEP Operations

MD SCSEP has a dual responsibility to USDOL as well as its participants. Therefore, in the event that MD SCSEP has to redistribute positions in accordance with a new Census, or other reliable

data, the program will seek to comply with equitable distribution while avoiding disruption to current program participants. This may mean pausing enrollments, monitoring exits for cause as well as durational limit, monitoring hours, or changing waiver policies. Participants retain their right to grievances throughout their duration in the program.

(d) SCSEP Operations

(1) *Administrative*: describe the organizational structure of the project and how subprojects will be managed, including:

The MD Labor, DWDAL currently administer the SCSEP as the designated state grantee in 11 counties as follows:

- Allegany County,
- Calvert County,
- Caroline County,
- Charles County,
- Garrett County,
- Kent County,
- Queen Anne's County,
- St. Mary's County,
- Talbot County,
- Washington County, and
- Baltimore City.

The program is under the direct supervision of the Director of Office Workforce Development and the Special Program Manager. The SCSEP Program Manager reports directly to the Special Program Manager.

(A) identification of the key staff, including the primary responsibilities and the amount of time assigned to the SCSEP grant;

Key Staff and Primary Responsibilities

Deborah Wilburn – Program Manager - 100 percent State Employee

- Establish an overall goal of unsubsidized employment for the PY and develop a system to transition participants from subsidized to unsubsidized employment before their individual durational limit maximum.
- Prepare and submit grant applications, including program narrative, budget, budget justification and the equitable distribution report.
- Prepare the quarterly narrative reports and the state's four year strategic plan.
- Monitor the grant funds and expenditures to ensure compliance with cost allocations in the regulations. Ensure the 9130 report and close out reports are submitted in a timely manner.

Tamara Snell – Assistant Program Manager/Admin. Specialist - 100 percent State Employee

- Manage all aspects of the national web-based entry system for SCSEP including process new program enrollments, host agency agreements, host agency transfers, and follow-ups to ensure the collection and reporting of all SCSEP required data according to specified time schedules.
- Ensure employment specialist and participant staff are familiar with the latest instructions for data collection, including ETA administrative issuances (e.g. TEGLS, Data Collection and Data Validation Handbooks).
- Support quality improvement including interpretation and training on SCSEP regulations. Maintain excellent contacts with the USDOL Charter Oak, host agencies, participants and potential participants.

Chapman Richardson, Program Operator/Employment Specialist - 100 percent State Employee

- Recruit and select eligible individuals with priority service and/or minorities to assure maximum participation in the program.
- Develop and implement an Individual Employment Plan (IEP) for each participant. Update and modify IEP twice per year to reflect the participant progress and new goals.
- Collaborate with workforce investment boards, AJCs, veteran providers and disability networks to maximize opportunities for participants to obtain workforce development, education, and supportive services to help participants move into unsubsidized employment.
- Identify and recruit new 501(c)(3) organizations or public agencies as Host Agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
- Orientate and train program participants and host agency supervisors on the program goals, objectives and policies and procedures.
- Recertify the income eligibility of each participant at least once every 12 months.

Josephine Cabi, Program Operator/Employment Specialist - 100 percent Contractual Employee

- Recruit and select eligible individuals with priority service and/or minorities to assure maximum participation in the program.
- Develop and implement an Individual Employment Plan (IEP) for each participant. Update and modify IEP twice per year to reflect the participant progress and new goals.
- Collaborate with workforce investment boards, AJCs, veteran providers and disability networks to maximize opportunities for participants to obtain workforce development, education, and supportive services to help participants move into unsubsidized employment.
- Identify and recruit new 501(c)(3) organizations or public agencies as Host Agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
- Orientate and train program participants and host agency supervisors on the program goals, objectives and policies and procedures.
- Recertify the income eligibility of each participant at least once every 12 months.

Melody Hain, Program Operator/Employment Specialist -100 percent Contractual Employee

- Recruit and select eligible individuals with priority service and/or minorities to assure maximum participation in the program.
- Develop and implement an Individual Employment Plan (IEP) for each participant. Update and modify IEP twice per year to reflect the participant progress and new goals.
- Collaborate with workforce investment boards, AJCs, veteran providers and disability networks to maximize opportunities for participants to obtain workforce development, education, and supportive services to help participants move into unsubsidized employment.
- Identify and recruit new 501(c)(3) organizations or public agencies as Host Agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
- Orientate and train program participants and host agency supervisors on the program goals, objectives and policies and procedures.
- Recertify the income eligibility of each participant at least once every 12 months.

(1) Vacancy – SCSEP Program Operator/Employment Specialist – 100 percent Contractual Employee (Plan to fill one full time and part time vacancy in Baltimore City) (Plan to fill one full time vacancy in Upper Shore)

- Develop and implement an Individual Employment Plan (IEP) for each participant. Update and modify IEP twice per year to reflect the participant progress and new goals.
- Collaborate with workforce investment boards, AJCs, veteran providers and disability networks to maximize opportunities for participants to obtain workforce development, education, and supportive services to help participants move into unsubsidized employment.
- Establish an initial goal of unsubsidized employment for participants and promote and facilitate job placement with host agencies or other organizations.
- Identify and recruit new 501(c)(3) organizations or public agencies as Host Agencies to provide a variety of training options that enable participants to increase their skill level and transition to unsubsidized employment.
- Orientate and train program participants and host agency supervisors on the program goals, objectives and policies and procedures.
- Plan and participate in job fairs, older worker conferences, training seminars, and other planned older worker events.
- Ensure program standards and goals are maintained through recruitment, placement and follow up and individual durational limit exit.
- Recertify the income eligibility of each participant at least once every 12 months.

(B) Include an organization chart depicting any subgrantees or local affiliates implementing the grant. Include a table with authorized positions for each subgrantee or affiliate, if applicable;

Table: Local Affiliates, Location and Authorized Positions

Local Staff	Location	Authorized Positions
Chapman Richardson/Program Operator (19 years' experience)	Allegany and Garrett Counties	18
Vacant – Program Operator Charleatha Smith/Participant Staff (1 year experience)	Baltimore City	39
Josephine Cabi/Program Operator (1 year and 4 months)	Calvert, Charles and St. Mary's Counties	23
Vacant – Program Operator	Caroline, Kent, Queen Anne's and Talbot Counties	16
Melody Hain/Program Operator (5 years' experience)	Washington County	17
Total	N/A	**113**

(C) describe training that will be provided to local staff;

The local staff will be trained on how to conduct outreach to local businesses and how to promote the program and the current participants. They will partner with the Business Service Representatives in their respective counties and identify participants in the program who have mastered all the training and ready to become gainfully employed with local employers. The local affiliates will be provided case management training to better learn how to keep case notes on the participants.

(D) describe how projects will be monitored for program and financial compliance, including audit plans; and

MD Labor's monitoring and compliance team will continue to conduct an internal audit and monitor for program and financial compliance. The monitoring team will use an AJC questionnaire that will ask the local staff questions about the SCSEP services. The questionnaire will include the following questions:

1. What type of SCSEP information is provided to new applicants at the AJCs or satellite locations (e.g. SCSEP applicant profile form, SCSEP fact sheet, and/or TABE testing information)?
2. During the eligibility determination process, did the applicants complete a basic education test (e.g. TABE) and obtain their reading and math grade level? ____ Yes ____ No
3. After 90 days of enrollment in the program, does the Participant Trainees register on the MWE and complete a minimum of two job searches a month? _____ Yes ____ No
4. After 90 days of enrollment in the program, have the Participant Trainees completed Individual Employment Plans (IEP) in the MWE?
5. How and when are the IEPs updated?
6. Are former Participant Trainees who have exited the program being followed up? _____ Yes _____ No
7. What kind of information is being gathered during the follow up activities?

8. Was the performance measures for entered employment and employment retention achieved in the county or counties in the last two PYs? _____ Yes _____ No

In addition, the monitoring and compliance team will review local staff program files and perform a data validation. The team will receive a data validation sample list and check the files against the information in the SCSEP web based system.

(E) describe how the state will manage its providers and how it will transfer participants if new providers are selected to serve in the state.

The local staff will manage the host agencies which are the training providers by conducting periodic monitoring visits with the participant and the host agency supervisors. MD SCSEP will closely monitor and transfer participants to new training assignments within a year. When new training providers enter a host agency agreement with the state, participants approaching their one year anniversary and whose job interests match the training assignment will be transferred to new training providers.

(2) *Recruitment*: describe how grantee will recruit and select of participants will be achieved. The eligibility of participants is described under 20 CFR 641.500 and 641.525.

Local affiliates will recruit potential participants through walk-ins to the local AJCs, senior centers, and referrals from participants, current host agencies, SSAI, the Maryland National Grantees, and other WIOA partners. MD Labor, the Maryland state grantee will recruit and select participants based on eligibility. For participant enrollment, older mature adults must be residents of Maryland, 55 years or older, unemployed, and with a family income of 125 percent or less of the poverty level (after allowable exclusions), as established by the U.S. Department of Health and Human Services. Enrollment priority is given to the individuals with the following employment barriers:

- Is a Veteran or a qualified spouse of a veteran,
- Is 65 years of age or older,
- Has a disability,
- Has LEP,
- Has low literacy skills,
- Resides in a rural area,
- Is homeless or at risk of homelessness,
- Has low employment prospects, and
- Has failed to find employment after utilizing services provided under Title I of WIOA.

All candidates who meet the age, income, and possess a minimum of two or more employment barriers will be selected to enroll in the program.

(3) *Income Eligibility*: describe how participant income will be recertified each year, including where eligibility records will be maintained.

Income eligibility of every participant, even participants on an approved break, will be reviewed before the beginning of the new program year by the local affiliate (Employment Specialist) or

SCSEP staff. At recertification, participants must provide documentation for household income. The documentation may include social security award letters, bank statements, pension statements, pay stubs, and income tax returns. For proof of family size, the participants must provide a tax return, HUD form or rental leases, or a signed attestation letter or signed statement.

If, at any time, the Employment Specialist or SCSEP staff suspects that a participant may be over the federal poverty level, the participant may be asked to provide information for the necessary documentation at that time. If a participant is determined to be over-income on the recertification date or at any other point during SCSEP participation, they will be provided a 30-day written notice of termination. The participant can continue to train until their exit date. The local SCSEP staff will refer the participant to the LEA for other programs and/or an AJC Job Service Specialist for job search assistance. All eligibility records will be maintained at the local program office.

(4) *Orientation*: describe the orientation procedures for:
(A) Participants

New participants will be provided orientation and the essential information required to effectively fulfill their training assignments.

Group or one-on-one orientation sessions will include, but not be limited to, the following information:

a. SCSEP project goals and objectives.
b. Participant rights and responsibilities; participant handbook.
c. Training site information, including the following:
    1. Name of the agency;
    2. The agency's address and directions to the location, if needed;
    3. The training site supervisor's name;
    4. A training plan with duties listed; and
    5. A training schedule (including hours and days).
d. Administrative procedures (including instructions on how to enter and submit a time sheet in Workday). Policies on training hours, wages, and fringe benefits.
e. Policies on leave and calling in sick.
f. The Individual Employment Plan (IEP).
g. Training opportunities available through the project.
h. Service plans in the IEP to assist in the participant's transition to unsubsidized employment.
i. Available supportive services.
j. Permitted and prohibited political activities.
k. Safe working habits and conditions.
l. Procedures for reporting accidents and handling emergencies.
m. The Age Discrimination in Employment Act (ADEA).
n. The Americans with Disabilities Act of 1990.
o. The Drug-Free Workplace Act of 1988.
p. Grievance procedures.

(B) Host Agencies

The Employment Specialists and/or SCSEP staff meet with the new host agency staff and give them an overview of the program using the host agency handbook as a guide. They conduct an onsite monitoring visit to make sure the training site is a safe training location for the participants. The monitoring forms are placed in the Host Agency file.

(5) *Duration Limits*: describe any policy for maximum duration of enrollment or maximum time in community service and provide a copy of the current Duration Limit policy.

MD SCSEP follows the final rule for maximum duration of enrollment of 48 months without the possibility of extension. MD Labor will be formulating future state policy and review the final rule and adapt as warranted. This means that no participant can remain in the program beyond the 48-months' time limit for participation.

(6) *Assessments*: describe the procedures for assessing job aptitudes, job readiness, and job preferences of participants and their potential to transition into unsubsidized employment. Also describe how the assessment will be used to develop the participant's Individual Employment Plan (IEP).

After participants have been determined eligible to participate in SCSEP, they will:

- Be interviewed to determine job aptitudes, job readiness and job preferences, current skills and past work and volunteer experience;
- Complete a self-assessment of current interests, experiences and abilities; and
- Complete an independent, computer-based assessment of trainability (i.e., the Test of Adult Basic Education or TABE).

Based on this information, they will be matched to a community service assignment at a host agency. Within the first 30 days of training, the local affiliate will meet with the participant to develop an Individual Employment Plan (IEP). Together the participant, the Employment Specialist will establish goals, such as training needed for viable unsubsidized employment and supportive services to address barriers that may get in the way of obtaining IEP goals. The SCSEP staff will conduct periodic assessments and enter the case notes in the MWE Website.

Referrals will be made to Title I for eligible participants for additional assessment and training as needed.

(7) *Community Service Assignments*: describe how the participant will be assigned to community service including:
(A) the types of community service activity that will be emphasized and how they were chosen; methods used to match participants with community service training;

The participant will be assigned to a community service assignment based on their job interests and job preferences. The community service assignments are mostly office and administrative

support, food preparation, and service and community and social services. MD SCSEP plans to seek more meaningful community service activities in other state agencies.

(B) the extent to which participants will be placed in the administration of the project itself;

The MD SCSEP program will attempt not to place participants in the administration of the project itself, but it may be required in a few cases. The use of SCSEP participants is seen as a meaningful training opportunity and to assist the LEA's in administration of the program on the local level. The main emphasis of the training opportunity is case management. The SCSEP participants learn how to manage a caseload of clients, the proper way to create case notes, and how to provide quality customer service and how to follow up with clients in a timely manner.

Currently, MD SCSEP has one participant staff training as office support and as a case worker. MD SCSEP is in the process of interviewing and selecting another participant staff to assist the SCSEP administrative office. Interviews are scheduled at the beginning of the year.

(C) The types of host agencies used and the procedures and criteria for selecting the assignments;

The current host agencies include senior centers, schools, churches, libraries, nonprofit organizations, and government agencies, which all must abide by the host agency agreement and follow the program guidelines. New nonprofit organizations and government agencies are selected based on their ability to provide meaningful and relevant work experiences that can lead to new employment skills and that can be applied to further employment. Older workers often lack basic employment skills which is why host agencies are developed to address the basic skills and prepare participants for the job market. The program always tries to provide the best match between participant and host agencies that will lead to experiences which will result in unsubsidized employment. The local programs always have a number of host agencies available which are willing and eager to develop competencies which lead to employment. The matching between the host agencies and the program participants is done purposely so that the host agency assignment provides the skill needed for the participant to reach a satisfactory outcome as a result of the individual employment plan. Such plans are updated twice a year to ensure the success of the participant and the program.

The current host agencies include churches, libraries, schools and senior centers, nonprofit organization, and government agencies. The community service assignments must be relevant and meaningful assignments that will provide legitimate new job skills that can be applied to a new job.

(D) the average number of hours in a participant's training week;

Participants train an average of 20 hours a week to a maximum of 40 hours within a pay period.

(E) the fringe benefits offered (if any); and

Fringe benefits that are offered to participants employed under the program include:

- All fringe benefits required by law and by federal regulations, e.g. FICA;
- Physical examinations; and
- Workers' compensation coverage.

A physical exam is offered to each participant annually. The examining physician shall provide, to the participant only, a written report of the results of the assessment. A participant may refuse the physical exam. The participant must sign the participant waive refusal form. MD SCSEP will provide workers' compensation coverage for participants.

(F) procedures for ensuring adequate supervision.

To ensure adequate supervision, all host agencies are required to sign a host agency agreement and assigned a host agency supervisor to oversee the participant(s) and the community service assignments. The local affiliates will conduct periodic onsite monitoring visits to the host agencies.

(8) *Training*: describe the training that will be provided during community service assignments and any other types of training provided, including linkages with local AJC centers, and RA.

Each training program is based on the individual preferences of the participant and their subsequent placement into a host agency training assignment. AJCs offer myriad training opportunities which can be accessed through regular participation in AJC activities. Participation in the AJC activities may help participants to develop and pinpoint their employability skills, explore job searching tools most used to find work, uncover which skills are most in demand for any kind of work, identify ways to maintain positive attitudes throughout the job seeking process, and interact with additional sources of information, to name a few.

Integration of the SCSEP into the AJC system allows for maximum coordination between the program and all the programs that are available in the local centers. Also, the fact that the program is a part of the workforce development system which maintains the AJC is most helpful in assuring that participants take advantage of training opportunities that are available in local and neighboring areas.

Specific steps will be taken to integrate the training program into MD Labor's AJCs and MD Labor's workforce development system and programs including the Apprenticeship.

An apprenticeship program allows an employee to earn a salary while learning necessary skills to succeed in a high-demand career. SCSEP can be a bridge to an existing apprenticeship program and can be an impetus to create new apprenticeship programs.

Successful apprenticeship candidates must:

- Be 18 years of age or older,
- Be physically able to perform required tasks,
- Be drug free,
- Have to successfully pass specified tests in Math and English,
- Have transportation, and

- Have a Maryland High School Diploma.

Currently -50 percent of the MD SCSEP participants possess a high school diploma or equivalent or higher education. MD SCSEP will steer participants who are interested in increasing their work skills and earning higher wages to the Maryland Apprenticeship Program. At the present, some SCSEP participants are training at host agency sites as a maintenance trainee. After one year in their training assignment, MD SCSEP will evaluate the participant's performance to see if they met and exceeded all of their training benchmarks.

If these participants lack a driver's license and/or their own transportation, MD SCSEP will provide support services and work with them and the Department of Motor Vehicle Administration to acquire or renew a driver's license. In addition, the SCSEP staff will assist participants with obtaining transportation vouchers and/or their own vehicle.

After the participants have met all the requirements for Apprenticeship Program, they will be matched with program that closely matches their interest. This is done through the matching process whereby a participant's acquisition of skills lead to those that are required in established apprenticeship or may be required for new apprenticeship programs. If there is a match the participant will be selected into the Apprenticeship Program and exited out of SCSEP because participants can not earn wages while still in the program.
The participants selected will receive on-the-job training and job-related instruction. The Apprenticeship program extends the unique opportunity of preparing workers for careers while simultaneously meeting employer's needs for a highly-skilled, highly-trained workforce.

(9) *Supportive Services*: describe the supportive services that will be offered to help participants obtain and retain an unsubsidized job, including transportation assistance (if applicable).

Participants will have several supportive services available. The types of supportive services include, but are not limited to:

- Training;
- Job search assistance (creating resume, mock interview skills, and online job applications)
- Incidentals such as uniforms and safety glasses; and
- Counseling and referrals (housing and transportation assistance).

If a participant needs transportation assistance, the Employment Specialist or Senior Service Liaison will contact the transportation authority to inquire about travel vouchers, mobility transportation, or other options.

(10) *Termination*: describe procedures for terminating a participant, including Individual Employment Plan (IEP) terminations. Please provide a copy of the current termination procedures.

B. TERMINATION PROCESS AND POLICY

The MD Labor will provide all participants a written copy of the Participant Trainee Handbook that includes the *Termination Policy* and will verbally review this policy with each participant at

the time of enrollment. The Termination Policy will be followed fairly and equitably in terminating any participant. There is no upper age limit for participating in SCSEP and participants cannot be terminated due to age. All terminations require a 30-day written notice. All terminations are subject to the MD Labor *Grievance Policy,* and participants will be informed of their right to appeal.

Disciplinary/Termination Procedures

The termination procedure will typically include the following disciplinary steps:

Step One: Documented Written Warning
The SCSEP staff will warn a participant and follow up with written documentation of the warning. The SCSEP staff will discuss with them via telephone or in person. The participant will be informed of the corrective action needed and the time frame for which the corrective action must be taken. A copy of the written warning will be sent to the participant and placed in their personnel file.

Step Two: Termination
Participants may not be terminated until 30 calendar days after they have been provided a written notice. Written notices of termination, including the reason for the action and appeal procedures, must be given to the participant if he/she is expected to be terminated from SCSEP. Participants have the right to appeal any decision.

The SCSEP staff may skip Step One and go straight to Step Two and terminate a participant immediately for serious violations such as fraud, theft, destruction of property, violence, or threats to health and safety of the participant or others.

Terminations From SCSEP

At time of enrollment, MD Labor provides each participant with a written copy of its Participant Trainee Handbook. Each participant is also notified verbally of the termination policies held therein. This handbook contains policies for terminating a participant for cause or otherwise, as described in 20 CFR 641.580(g).

Participants may be terminated from the program by statute, for cause, or Individual Employment Plan, over income related reasons, and for failure to accept a reasonable number of job offers or referrals to unsubsidized employment consistent with their Individual Employment Plan (IEP). The specific conditions for termination under one of these categories are as follows:

BY STATUTE reasons for termination include:

- Fraud - Examples of fraudulent actions include knowingly providing false information to qualify for SCSEP or maintaining other employment while also participating in the SCSEP program.
- Staff incorrectly determined participant to be eligible at enrollment or recertification.
- Participant is deemed ineligible during recertification.

- Participant reaches individual durational limit.
- Participant becomes employed while enrolled in SCSEP.
    - To qualify for enrollment in SCSEP, a participant has to be unemployed; all participants are informed that they may not be employed while participating in the program and that they must notify the program representative immediately upon becoming employed. A participant who is discovered to be employed while enrolled without having notified the program of the employment will be terminated from the program. The participant will be placed immediately on "Leave without Pay" and a 30 day notification of termination will be issued in writing to the participant.

FOR CAUSE reasons for termination include:

- Refusal to cooperate in establishing eligibility.
- Unwillingness to perform training assignment duties.
- Refusal to accept a transfer to a different training assignment supported by the participant's IEP.
- Frequent tardiness or unauthorized absences as documented by records.
    - Participants must follow the attendance and tardiness policy of their host agency.
    - Falsification of timesheets or official documents by the SCSEP participant.
- Insubordination:
    - Refusal to accept or complete tasks as assigned by host agency supervisor.
    - Refusal to follow verbal or written instructions as given by program staff or authorized host agency staff.
- Obscene/abusive language or behavior.
- Non-compliance with Substance Abuse Policy, which states:
    - MD Labor absolutely prohibits the use, consumption, sale, purchase, transfer, or possession of any illegal prescription drug or non-prescription drug by any SCSEP participant during working hours while enrolled in SCSEP. In addition, SCSEP participants are strictly prohibited from being under the influence of alcohol during working hours, while enrolled in SCSEP.
- Failure to cooperate with Program and/or Host agency staff.
    - Failure to attend SCSEP sponsored meetings with program staff
    - Failure to attend any required training in support of the overall training assignment (i.e., not attending food safety classes as a kitchen aide)
    - Failure to complete paperwork or communicate break status before commencing
    - Failure to follow policies and procedures of host agency without good cause.

FOR INDIVIDUAL EMPLOYMENT PLAN (IEP) related reasons for termination may include, but are not limited to:

- Failure to participate in the process as outlined in the IEP document.
- Repeated refusal by the SCSEP participant to perform specific actions, without good cause:
    - Attending a job interview;
    - Accepting an initial or alternative assignment;
    - Registering at the local AJC;

- Improving personal habits or appearance as required by the standards of the specific host agency or in the commission of specific tasks outlined in the training plan; and
- Participating in workshops, training, etc.

Cause violations and IEP-related violations must be documented in writing. Each documented violation must be discussed in a meeting with the SCSEP participant, the host agency supervisor, and/or the Employment Specialist.

Termination for Individual Employment Plan Violation – Failure to participate in the IEP process may be cause for corrective actions and, as a last resort, termination. Prior to an IEP related termination, the participant will be given a chance to correct the offending action. Written notice shall be given to the participant, citing a specific incident in which they did not fulfill their responsibility. The notice should list the specific event, cite the jointly signed agreement provision, and provide a period of time for corrective action.

FOR OVER INCOME: If at any time, SCSEP program staff determine that a participant is no longer eligible for continued enrollment because he/she has attained additional includable income during the preceding six or 12 months or because of a change in family status, that participant must be terminated with a 30 day notification. Determinations of ineligibility cannot be based on anticipated changes in income or family size; they must be based on actual data. Participants have the responsibility to report increases in income and changes in family status. Participants are allowed to continue training at their Community Service Assignment until their date of exit.

FOR VIOLATION OF LEAVE OF ABSENCE: Participants may be terminated if they reach the time limit established with MD Labor or if they do not comply with MD Labor-approved policy as outlined in the Participant Handbook.

FOR REACHING DURATIONAL LIMIT: The maximum eligibility period for SCSEP participation for people enrolled on or after July 1, 2007, is a total of 48 months. Participants who reach their durational limit must be terminated on or before the date when they reach their four year limit. Participants are allowed to continue training at their community service assignment until their date of exit but not encouraged to do so.

FOR PROGRAM INELIGIBILITY: If MD Labor determines that a participant is no longer eligible during the eligibility verification process, MD Labor must give written notice explaining the reasons for termination and applicable procedures to appeal. If MD Labor discovers (after the eligibility or recertification process is finished) that staff incorrectly determined the participant to be eligible through no fault of their own; MD Labor must give written notice. Participants are allowed to continue training at their community service assignment until their date of exit.

FOR BECOMING EMPLOYED WHILE ENROLLED IN SCSEP: To remain qualified for enrollment in SCSEP, a participant has to be unemployed. If, at any time, MD Labor staff determines that a participant acquired an unsubsidized job while enrolled on SCSEP, that participant will be placed on "Leave Without Pay" for 30 calendar days and will be given an immediate written letter explaining the reason for termination and the appeal procedure.

FOR FAILURE TO ACCEPT A REASONABLE NUMBER OF JOB OFFERS OR REFERRALS TO UNSUBSIDIZED EMPLOYMENT CONSISTENT WITH THE INDIVIDUAL EMPLOYMENT PLAN: If at any time, MD Labor staff determines that a participant has failed to accept reasonable number of job offers or referrals to unsubsidized employment, that participant will be placed on "Leave Without Pay" for 30 calendar days and will be given an immediate written 30 calendar notice letter explaining the reason for termination and the appeal procedure.

(11) *Complaints and Grievances*: describe the procedures for addressing and resolving participant complaints and grievances related to program termination. Please provide a copy of the current complaint/grievance policies.

GRIEVANCE/COMPLAINT POLICY AND PROCEDURE

The MD Labor grievance/complaint policy and procedures are conveyed to the participants and the host agency supervisors through the Participant Trainee Handbook, the Host Agency Handbook, and to potential applicants upon request.

Written notices of termination including the reason for the action and appeal procedures must be given to participants who SCSEP program staff expect to terminate. Participants have the right to appeal any termination decision. Participants may not be terminated until 30 calendar days after they have been provided a written notice. MD Labor will ensure that the grievance procedure will be provided uniformly and fairly.

A participant must file a grievance within 15 days of the alleged incident to the SCSEP Program Manager, triggering the following grievance policy and procedure. All written appeals should *first* be submitted to the following:

Ms. Deborah Wilburn, SCSEP Program Manager
Maryland Department of Labor
1100 North Eutaw Street, Room 201
Baltimore, MD 21201

Upon receipt of a written complaint or appeal of Termination, the Program Manager and/or the SCSEP staff, the participant who filed the complaint, and the host agency supervisor, if appropriate, should seek to resolve the differences in an informal conference, which should be held within 15 business days. The receipt of the written complaint/appeal will be documented by the Program Manager and/or SCSEP staff. A written statement concerning the result of the decisions made at the conference should be provided to all involved persons within the following five days.

If the participant who filed the complaint is not satisfied with the results of the informal conference, the participant shall have the right to further appeal, in writing, to the Secretary of MD Labor or a designee. This level of appeal should be submitted to:

Ms. Lorella Dicks, Special Programs Manager
Maryland Department of Labor

1100 North Eutaw Street, Room 201
Baltimore, MD 21201

The appeal shall be heard within 15 business days upon receipt. The participant shall have the opportunity to confer regarding the affected policies, the right to use the assistance of other persons at the hearing, to call witnesses, and to question the persons involved in the complaint. A written summary of the results of the appeal and all related decisions made as a result of the hearing shall be provided to all persons involved within five business days. The Program Manager will keep all rendered decisions on file within the main SCSEP office for a period not less than three years.

1. All SCSEP staff are provided training and direction to effectively accept, investigate, and respond to appeals submitted by participants of the SCSEP.
2. The complaint resolution procedure of MD Labor's SCSEP shall be completed within 45 days of the filing of a complaint, unless there are mutually agreed upon delays, which shall be documented. The 45 day period shall include time for the filing of an appeal to the Secretary or designee of MD Labor's SCSEP.
3. MD Labor's response is considered final unless the complainant (participant) alleges that the grievance policies and procedures found herein were not followed OR there is a further allegation of a violation of federal law (other than civil rights laws) that has been unresolved for the previous 60 days.
4. If the complainant alleges the factors in #2, an appeal must be filed with the USDOL, Employment and Training Administration.

Allegations of violations of federal law, which are not resolved within 60 days under MD Labor's procedures, may be filed with the Chief, Division of Adult Services, Employment and Training Administration, USDOL, 200 Constitution Avenue, NW., Washington, DC 20210. Allegations determined to be substantial and credible will be investigated and addressed.

NOTE: If the complaint alleges discrimination in violation of civil rights laws, the complaint must be filed with the Civil Rights Center at the US USDOL:

Office of External Enforcement
Civil Rights Center
US USDOL
Room N-4123
200 Constitution Avenue, NW
Washington, DC 20210

(12) *Maximizing enrollment*: describe procedures for fully enrolling all available slots, including over enrolling participants, and how over-enrollments will be balanced with equitable distribution requirements.

MD SCSEP will closely monitor the equitable distribution in each of the 11 counties. To fully enroll all available slots, the equitable distribution report is shared and discussed with the LEAs, and Employment Specialists.

MD SCSEP will seek best practices for improving equitable distribution from counterparts including SSAI and the District of Columbia, Department of Employment Services (DOES) Division of State Initiatives (DSI).

Over enrollments will be balanced with equitable distribution requirements by focusing on exiting the SCSEP participants into unsubsidized jobs. Currently only one of the 11 counties is over enrolled.

(13) *Performance*: include a proposed level for each performance measure for each of the PYs covered by the plan. While the plan is under review, the state will negotiate with the Employment and Training Administration to set the appropriate levels for the next year. The state may also negotiate performance levels in a subsequent modification. At a minimum, states must identify the performance indicators required under the SCSEP Final Rule published on September 1, 2010, and, for each indicator, the state must develop an objective and quantifiable performance goal for the next year. The performance measures include:
(A) entered employment,
(B) employment retention,
(C) average earnings,
(D) service level,
(E) service to most-in-need, and
(F) community service

(14) *Administrative Costs*: describe any request for an increase in administrative costs consistent with section 502(c) (3) of the Older Americans Act.

SCSEP ASSURANCES

The State Plan must include assurances that: Where SCSEP is included in the Combined Workforce Plan, the state established a written policy and procedure to obtain advice and recommendations on the State Plan from representatives of the state and area agencies on aging; state and local boards under WIOA; public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the state, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Social service organizations providing services to older individuals; Grantees under Title III of OAA, Affected Communities, Unemployed older individuals, Community-based organizations serving older individuals; business organizations; and labor organizations.

Representatives of the State and area agencies on aging: Yes

State and local boards under WIOA; Yes

Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as under provided under section 506(a)(3) of OAA and 20 CFR 641.320(b);Yes

Social service organizations providing services to older individuals; Yes

Grantees under Title III of OAA; Yes

Affected Communities; Yes

Unemployed older individuals; Yes

Community-based organizations serving older individuals; Yes

Business organizations; and Yes

Labor organizations Yes

The Maryland Department of Labor has written procedures to support the SCSEP Assurances and will issue a policy within the year.

COMMUNITY SERVICES BLOCK GRANT

Note: Below is information about the employment and training activities carried out under the Community Services Block Grant (CSBG) (42 U.S.C. 9901 et seq.) that is included in the WIOA Combined State Plan. The complete CSBG State Plan is submitted directly to the Federal agency that administers that program and is collected under OMB Control Number: 0970-0382. Where CSBG is included in the Combined State Plan, the State CSBG Lead Agency (as designated by the chief executive of the State under the requirements of section 676(a) of the CSBG Act (42 U.S.C. 9908(a)) will coordinate plans for employment and training activities under CSBG as part of a larger antipoverty and workforce development strategy.

As part of the Combined State Plan, the State CSBG Lead Agency must: (a) Describe how the State and the eligible entities will coordinate the provision of employment and training activities through Statewide and local WIOA workforce development systems; and may (b) Provide examples of innovative employment and training programs and activities conducted by eligible entities or other neighborhood-based organizations as part of a community antipoverty strategy.

Eligible entities coordinate the provision of employment and training activities through statewide and local WIOA workforce development systems as follows:

The Community Services Block Grant (CSBG) was a new addition to Maryland's 2018 WIOA State Plan. However, the OJT and the State's 17 local CAAs have been partners in the state workforce system for some time. Recognizing both agencies' common customer, Maryland's CAAs have been instrumental in referring clients to Local Areas for training. CAAs have entered into Memoranda of Understanding with Local Area WIOA partners and have built relationships with DORS to enhance access to VR services.

CAAs in Maryland have also led innovations in 2Gen service delivery. Specifically, Garrett County Community Action Committee, Inc. and the Allegany County Human Resources Development Commission are recognized as national leaders in 2Gen implementation. At the state level, representatives of DHCD, the lead CSBG State Agency, and the Maryland Community Action Partnership, Maryland's CAA State Association, sit on Governor Hogan's Two Generation Family Economic Security Commission. As a combined plan partner, DHCD is included on the state's WIOA Alignment Group and this participation since 2018 has led to enhanced coordination between CAAs and local workforce systems.

The inclusion of the CSBG program in Maryland's Workforce Plan opens new opportunities for CAAs to be integrated into local workforce services delivery. As a result of this integration, all Local Areas are required to address how they work with these entities in a more systematic way in local plan formulation and through the execution of WIOA compliant Memoranda of Understanding and Resource Sharing Agreements. Additionally, by July 2020, CAAs will be participating on all Local Boards.

The following are examples of innovative employment and training programs and activities conducted by eligible entities or other neighborhood-based organizations as part of a community antipoverty strategy:

- A new Adult Literacy Program is being developed for adults who cannot read or write utilizing the Laubach Reading System. Through this system volunteers will work one-on-one with participating adults.
- A CAA is providing training scholarships for skills training in occupations that are in high demand in respective jurisdictions.
- Adult literacy activities will take place with the parents of the agency's Department of Children and Family Services throughout the year through Parent Meetings and Socializations.
- In rural areas where transportation challenges exist, CAAs refurbish used vehicles and provide them to customers upon the completion of agreed upon goals.
- One Maryland CAA has established a partnership with a large hotel. Employment staff and job developers work with hotel employees to collaboratively develop training experiences. Participants are offered job training by hotel employees in many departments and are supported by a job developer or Job Coach through the experience.
- Another Maryland CAA provides Commercial Driver's License (CDL) training as possession of the Class B license can lead to higher earnings and advanced career opportunities. The training is conveniently offered in the evening so it is more accessible to participants.
- The same CAA also established a Student Intern Program that provides students with opportunities for training and employment. Area undergraduate and graduate students are selected and provided with a rich employment experience. Stipends and scholarships are made available to assist with the high cost of higher education and reduce the financial need for student loans.