

**THE MID-CYCLE MODIFICATION TO  
THE OAKLAND COUNTY MICHIGAN WORKS! AGENCY'S  
WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)  
FOUR-YEAR LOCAL PLAN  
FOR PROGRAM YEARS 2016 THROUGH 2019  
(i.e., JULY 1, 2016 THROUGH JUNE 30, 2020)**

**RESPECTFULLY SUBMITTED BY:  
THE OAKLAND COUNTY WORKFORCE DEVELOPMENT BOARD  
AND  
OAKLAND COUNTY EXECUTIVE L. BROOKS PATTERSON**

**Submission Date:**

**June 30, 2018**

**SECTION A:**

**THE APPROVAL REQUEST FORM FOR THE  
MID-CYCLE MODIFICATION TO THE WIOA FOUR-YEAR LOCAL PLAN**

**SECTION B:**

**THE NARRATIVE FOR THE  
MID-CYCLE MODIFICATION TO THE WIOA FOUR-YEAR LOCAL PLAN**

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**PLAN NARRATIVE**

**B.1. An Analysis of Regional Labor Market Data and Economic Conditions:**

- Prosperity Region Ten's Analysis – The analysis that is excerpted from Prosperity Region Ten's Mid-Cycle Modification to the Workforce Innovation and Opportunity Act (WIOA) Four-Year Regional Plan for Program Years 2016 through 2019 (i.e., July 1, 2016 through June 30, 2020) is Attachment A to this Plan. In addition to this regional analysis, the following information is specifically germane to Oakland County's labor market:
  - The "2012-2014 Oakland County Economic Outlook", which was prepared by the University of Michigan's Institute of Labor and Industrial Relations, found that Oakland County lost 44,728 jobs between 2006 and 2008, and that it sustained a record annual loss of 59,663 jobs in 2009. As a result, Oakland's 2009 unemployment rate surged to 12.8 percent, a dramatic increase from the 5.1 percent rate that the County averaged between 1990 and 2008.
  - The Institute's "2015-2017 Outlook" reported that, by 2011, "Oakland turned the corner to return to positive growth for a calendar year, creating 67,423 jobs in the three years from 2011 to 2013 – a torrid pace of 3.5 percent, or 22,500 jobs per year. This was the county economy's best performance over three years since the mid-1990s." The Outlook further states that "the recovery continued in 2014, but with total job growth moderating to 11,812 additions from its sizzling pace of the prior three years".
  - The "2018-2020 Outlook" states that the County added an average of 14,300 jobs per year during the period of 2014 through 2016, and that its unemployment rate averaged 3.5 percent in 2017.
  - The "2018-2020 Outlook" predicts that Oakland County will add another 42,000 jobs during the three year period: 12,200 in 2018; 14,000 in 2019; and 15,800 in 2020. This job growth will reduce the County's unemployment rate from 3.5 percent in 2017 to 3.4 percent in 2018; 2.9 percent in 2017; and 2.6 percent in 2020. 2.6 percent would equal Oakland's lowest recorded rate, which was achieved in 2000.
  - According to the "2018-2020 Outlook", "the County's labor force has grown every year since 2011, averaging a 0.9 percent pace per year from 2011 to 2015". This Outlook further asserts that "growth then picked up sharply to 2.3 percent in 2016 and 1.5 percent in 2017, as improving job opportunities encouraged more people to reenter the labor force". The Outlook projects that "labor force growth will slow to a more sustainable, but still healthy, average rate of 1.3 percent per year from 2017 to 2020". The Outlook concludes that Oakland's "tight labor market" will encourage workers to pursue jobs.
  - The "2018-2020 Outlook" predicts that job growth for this period will occur in all industry sectors, with particularly strong increases in the professional, scientific and

technical services “super-sector” (which includes many of the jobs associated with the knowledge economy) and the health care and social assistance services industries. Significantly, these sectors account for nearly half of the new jobs that employers will create during the period of 2018 to 2020.

- The “2016-2018 Outlook” found that “more than four in ten of the net new jobs created in the County from 2010-2015 were in high-wage industries”. The 2018-2020 Outlook predicts that high and middle wage industries (which are defined, respectively, as industries that pay annual wages of \$75,000 or more and \$35,000 to \$74,999) will constitute almost eighty percent of the County’s net new jobs during the period of 2017 through 2020.
- An analysis of the foregoing data reveals several trends that will shape Oakland County’s economic and workforce environment through Program Year 2019:
  - Oakland County’s economy will continue to grow.
  - The County’s strongest job growth will continue to stem from the highest wage component of the workforce.
  - Much of the County’s job growth will occur in sectors (e.g., professional and business services) whose jobs require higher levels of education.
  - As the County’s population continues to age into retirement, the number of available workers is likely to decline, and, as the County’s knowledge-based economy continues to evolve, increasingly more of these available workers will need appropriate skills. Thus, the “2012 – 2014 Economic Outlook” stresses “the critical importance of enhancing labor productivity, which can be achieved . . . through education, training, and entrepreneurial initiatives”.
  - The “2015 – 2017 Outlook” expands on the foregoing point, by asserting that two primary risks to Oakland’s continued job growth are the 1.) “shortages of skilled personnel hindering the hiring of workers, a phenomenon that has already surfaced, [and that] is bound to increase over time with the county’s vibrant economy”, and 2.) a more rapid “technological evolution of the auto industry, in which Oakland is a leading player”. Subsequent Outlooks reaffirm this assertion.
- A Description of the Local Board’s Strategic Vision and Goals: Oakland County’s economy will continue to flourish and grow, if employers can find, hire, and retain the highly skilled and qualified workers they seek. With this premise in mind, the Oakland County Workforce Development Board has developed the following vision and goals:
  - Vision: The Oakland County Workforce Development Board envisions that all job seekers, including adults, dislocated workers, students, in and out-of-school youth, individuals with disabilities, and the structurally unemployed, are aware of and can find, qualify for, obtain, and retain the highly skilled jobs employers create. The Board also envisions that employers of all sizes and from all industry sectors, including advanced manufacturing, information technology, and health care, have a talent-rich pool and pipeline of workers from whom they can recruit and hire.

As this vision is realized, Oakland County’s labor force will grow; its unemployment rate will decline; and employers from all sectors will locate to, and remain and expand in, the County. As a result, Oakland County will continue to be Michigan’s economic center and its transition to a knowledge-based economy will be complete.

- Goals: To realize the foregoing vision, the Oakland County Workforce Development Board has developed the following goals:
  - Meet workforce development program performance indicators and other key performance indicators (e.g., human service, business service and community outreach activities) that the U.S. Department of Labor, (USDOL) the Michigan Talent Investment Agency (TIA)/Workforce Development Agency (WDA) and/or the Oakland County Michigan Works! Agency may develop.
  - Market workforce development programs and services, including those that are described in this Plan, to students, job seekers, and employers.
  - Market job opportunities from all industry sectors, especially manufacturing and construction (e.g., the skilled trades); health care (e.g., nursing and allied health); and professional and business services (e.g., engineering and information technology).
  - Eliminate the gaps between the skills students, job seekers, and workers have and the skills employers seek in their employees.
  - Partner with industry sectors, small and large employers, and industry associations to create quality work-based training opportunities (e.g., on-the-job, customized, and occupational training; apprenticeships; internships; and work experience) for students, job seekers, and workers.
  - Provide employers quality business services (e.g., employee recruitment, screening, training, and retraining).
  - Provide job seekers quality workforce development services (e.g., job search assistance, remediation, assessment, case management, training, and job development).
  - Use technology to expand services for workforce development customers.
  - Improve access to career pathways that lead to an industry-recognized, portable and stackable certificate or certification.
  - Collaborate with the other Michigan Works! Agencies in Prosperity Region Ten to leverage funds, share services, and streamline administrative functions.
  - Collaborate with core partners (e.g., the Job Corps, Adult Education and Literacy, and Vocational Rehabilitation) and other programs (e.g., career and technical education programs and veterans' employment and training programs) to align, integrate, and coordinate workforce investment funds, services, and activities, and to avoid duplication of these services and activities.
- Expected Levels of Performance: In accordance with instructions in TIA/WDA Policy Issuance (PI): #16-02, the Oakland County Workforce Development Board was "not required to provide expected levels of performance for Program Year 2016 and Program Year 2017 for those performance measures designated by the USDOL as 'baseline' indicators". These baseline indicators follow:
  - WIOA Title I – Adult, Dislocated Worker, and Youth:
    - Measurable Skills Gain; and
    - Effectiveness in Serving Employers;

- WIOA Title II – Adult Education and Literacy:
  - Employment Second Quarter After Exit;
  - Employment Fourth Quarter After Exit;
  - Median Earnings;
  - Credential Attainment Rate; and
  - Effectiveness in Serving Employers;
- WIOA Title III – Wagner-Peyser:
  - Effectiveness in Serving Employers;
  - (Note – Credential Attainment Rate and Measurable Skills Gain do not apply to Wagner-Peyser); and
- WIOA Title IV – Vocational Rehabilitation:
  - All measures are designated as baseline.

The TIA/WDA has not yet issued Program Year 2018 policy guidance on these baseline indicators.

On November 18, 2016, the TIA/WDA officially notified the Oakland County MWA that they had agreed on Program Year 2016 (i.e., July 1, 2016 through June 30, 2017) and Program Year 2017 (i.e., July 1, 2017 through June 30, 2018) negotiated levels of performance for the other performance indicators under Title I of the WIOA and the Wagner-Peyser Act, as amended by Title III of the WIOA. These levels of performance for these measures follow:

<b>WIOA Adult:</b>	
Employment Rate 2 <sup>nd</sup> Quarter after Exit	86%
Employment Rate 4 <sup>th</sup> Quarter after Exit	79%
Median Earnings 2 <sup>nd</sup> Quarter after Exit	\$7,000
Credential Attainment within 4 Quarters after Exit	60%
<b>WIOA Dislocated Worker:</b>	
Employment Rate 2 <sup>nd</sup> Quarter after Exit	86%
Employment Rate 4 <sup>th</sup> Quarter after Exit	81%
Median Earnings 2 <sup>nd</sup> Quarter after Exit	\$7,148
Credential Attainment within 4 Quarters after Exit	68%
<b>WIOA Youth:</b>	
Employment or Placement Rate 2 <sup>nd</sup> Quarter after Exit	71%
Employment or Placement Rate 4 <sup>th</sup> Quarter after Exit	69%
Credential Attainment within 4 Quarters after Exit	60%
<b>Wagner-Peyser Act:</b>	
Employment Rate 2 <sup>nd</sup> Quarter after Exit	67%
Employment Rate 4 <sup>th</sup> Quarter after Exit	66%
Median Earnings 2 <sup>nd</sup> Quarter after Exit	\$7,000

The TIA/WDA and the MWA have not yet negotiated performance levels for Program Year 2018.

- The Workforce Development Board's Strategy to align the resources of local partners – To achieve the foregoing strategic vision and goals, the Oakland County Workforce Development Board has identified the following strategies for aligning the resources of the following partners and entities that carry out core programs under the WIOA:
  - The Board and the County Executive have competitively procured and selected WIOA one-stop operators who are also operating all of the following core programs: the WIOA Title I Adult, Dislocated Worker and Youth programs and the Wagner-Peyser Employment Service, as amended of Title III of the WIOA.

Since the same entities that serve as the one-stop operators will also operate these core programs, funding alignment among the programs will be easily and effectively achieved.

- The Board and the County Executive have negotiated and executed Memorandums of Understanding (MOUs) with entities that operate the applicable WIOA core and partner programs within the MWA. These programs include the Adult Education and Literacy Activities under Title II of the WIOA and Vocational Rehabilitation Programs under Title IV of the WIOA. Provisions in each of these MOUs describe:
  - how the core partner program and the Board will provide and coordinate services through the one-stop delivery system;
  - the core partner's roles and responsibilities;
  - the Workforce Development Board's responsibilities;
  - the One-Stop Operating Budget, which delineates, in an attached Infrastructure Funding Agreement (IFA), the core partner's infrastructure contributions to the Budget;
  - how the core partner program will refer customers to -- and receive referrals from -- the One-Stop Operators;
  - how the core program and the one-stop operators will ensure that the needs of workers and youth, including individuals who have barriers to employment (e.g., individuals with disabilities), are addressed, by providing necessary and appropriate access to the core program's services, technology, and materials;
  - the MOU's duration; and
  - procedures for amending the MOU.

As they continue to be implemented, these MOUs will ensure that funds of the foregoing core and partner programs are effectively aligned.

## **2. A Description of the Local Area's Workforce Development System:**

- Programs – The Oakland County MWA's workforce development system has numerous programs, including those that are identified as "One Stop Core and Partner" programs in Section 121(b)(1)(B) of the WIOA. These and other particularly relevant programs follow:
  - Programs authorized under Title I of the WIOA, including the Adult, Dislocated Worker, and Youth programs, Job Corps, YouthBuild, Native American programs, and Migrant and Seasonal Farm Worker programs;
  - the Employment Service that is authorized under the Wagner-Peyser Act, as amended by Title III of the WIOA;
  - Adult Education and Literacy Activities that are authorized under Title II of the WIOA;
  - Vocational Rehabilitation programs that are authorized under Title I of the Rehabilitation Act of 1973 (other than Section 112 or Part C);
  - the Senior Community Service Employment Program that is authorized under Title V of the Older Americans Act of 1965;
  - Career and Technical Education Programs at the Postsecondary Level that are authorized under the Carl D. Perkins Career and Technical Education Act of 2006;

- Trade Adjustment Assistance (TAA) activities that are authorized under Chapter 2 of Title II of the Trade Act of 1974;
  - Jobs for Veterans Grant Programs that are authorized under Chapter 41 of Title 38, United States Code (U.S.C.);
  - Employment and Training Programs that are carried out under the Community Services Block Grant Act;
  - Employment and Training Programs that are carried out by the Department of Housing and Urban Development (HUD) (Section 3);
  - Unemployment Compensation Programs that are authorized under State unemployment compensation laws, in accordance with applicable Federal law;
  - Programs that are authorized under Section 212 of the Second Chance Act of 2007;
  - Programs that are authorized under Part A of Title IV of the Social Security Act; and
  - Programs that are authorized under Section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)) and Work Programs that are authorized under Section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o)).
- The Board's Strategy to align services with entities that carry out core and other workforce development programs (including programs under the Carl D. Perkins Career and Technical Education Act of 2006) – To align services with entities that operate core and other workforce development programs, the Oakland County Workforce Development Board has identified the following strategies:
    - As noted in Section B.1.1 of this Plan Modification, the Board and the County Executive have competitively procured and selected one-stop operators, who also operate the following core programs: the WIOA Title I Adult, Dislocated Worker and Youth programs and the Wagner-Peyser Employment Service, as amended by Title III of the WIOA. The one-stop operators will also deliver Trade Act and TANF Act programs. Since the same entities that serve as the one-stop operators also operate these core and partner programs, service alignment among them will be easily and effectively achieved.
    - As noted above, the Board has negotiated and executed MOUs with entities that operate core and other workforce development programs. Provisions in these MOUs are identified in Section B.1. of this Plan Modification.

As they continue to be implemented, these MOUs will ensure that services with entities that operate core and other programs are effectively aligned.

- Other ways in which the Oakland County MWA has aligned or will align services with specific core and other programs are described in other sections of this Plan Modification. These programs and plan sections follow:
  - Economic Development – Sections B.4. and 27;
  - Secondary and Post-Secondary Education – Sections B.3 and 10;
  - Vocational Rehabilitation – Section B.6;
  - Community-Based Organizations – Section B.11;
  - Adult Education and Literacy – Section B.16; and
  - Unemployment Insurance – Sections B.4 and 15.

3. **A Description of How the Local Board and the Entities that Operate Core Programs will:**

- Expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. The Board and its core program partners will:
  - identify their customers' barriers and effective methods for removing these barriers, to coordinate, align and avoid duplication among the workforce development system's programs and activities;
  - develop strategies to provide career pathways as a way to provide individuals, including low-skilled adults, youth, and individuals with employment barriers (e.g., disabilities), with workforce investment activities, education, and supportive services that lead to employment and employment retention;
  - develop strategies for providing effective outreach to and improved access for individuals and employers who can benefit from the workforce development system's services;
  - develop and expand strategies for meeting employers', workers', and job seekers' needs, particularly through in-demand industry or industry sector partnerships;
  - develop on-going strategies for improving the MWA's one-stop delivery system, including its Michigan Works! (WIOA One-Stop) Service Centers, one-stop partners, and service providers;
  - develop strategies to support staff training, professional development, and awareness across the workforce development system's programs;
  - develop a one-stop system that aligns all efforts, initiatives, programs, and funding around high-demand and high wage industries and industry clusters;
  - strengthen veterans' services (and the priority of such services) and align them with the MWA's and its partners' programs and services;
  - strengthen and expand partnerships with economic development, Michigan Rehabilitation Services, the Bureau of Services for Blind Persons, adult education, career and technical education, Temporary Assistance for Needy Families, and other core and partner programs;
  - collaborate more closely with the other MWAs in Prosperity Region Ten and local community organizations, to expand services and eliminate duplication; and
  - enable economic, education, and workforce partners to build a skilled workforce, by innovating and aligning employment, training, and education programs.
- Facilitate, as appropriate, the development of career pathways and co-enrollment in core programs: In accordance with the contracts and/or MOUs the Workforce Development Board has executed, core program services will be available to all customers (e.g., adults, dislocated workers, youth, veterans, individuals with disabilities, returning citizens, public assistance recipients, and the general public) at each of the MWA's Michigan Works! (WIOA

One-Stop) Service Centers. The MWA's service centers will encourage co-enrollment and career pathways as the centers' staff members and their customers complete the MWA's comprehensive assessment/structured interview guide. As this assessment is completed, the staff member and customer will review and evaluate his/her academic and basic skills levels, basic occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and workforce development needs, to identify his/her appropriate services and career pathways.

Service strategies are developed for each customer who is enrolled in a WIOA activity. These strategies are directly linked to one or more of the WIOA performance indicators and identify career pathways that include education and employment goals, appropriate achievement objectives, and appropriate services, based on the customer's assessment.

The MWA will also facilitate career pathway development through its contract with Oakland Community College, which develops career pathway training programs for the MWA's WIOA participants and assists them as they navigate these pathways and complete their training programs with a post-secondary credential. This assistance includes "power path" screenings for attention challenges, visual stress syndrome, reading of single words, and visual/auditory function; career exploration; remediation; learning coaching; and job development/placement.

- Improve access to activities that lead to a recognized post-secondary credential (including a credential that is an industry-recognized, portable and stackable certificate or certification): The MWA's contractual relationship with Oakland Community College is described above. In addition, the MWA and its core partners will collaborate with other educational institutions (e.g., Oakland University, Baker College, Lawrence Technological University, and Walsh College); various proprietary schools (e.g., New Horizons); labor organizations; business organizations (e.g., Automation Alley and chambers of commerce); and specific employers, industries, and industry clusters. These collaborations will address how the MWA's and the core partners' customers can attain a recognized post-secondary credential that is portable, stackable, and industry-recognized. Such mechanisms as individual training accounts and apprenticeships will be used.

#### **4. A Description of the Local Area's Strategies and Services:**

- To facilitate engagement of employers, including small employers in in-demand industry sectors and occupations, in workforce development programs, the Oakland County MWA will continue to infuse work-based training (e.g., on-the-job training, customized, and occupational training; apprenticeships; internships; and work experience) within its over-all program design. This work-based training will occur at an employer site and/or will be based on the skills needs of one or more employers or an entire industry sector (e.g., advanced manufacturing, information technology, or health care). The training will be linked to "in-demand industry sectors" that have substantial current or potential impact on the local economy, and that contribute to the growth or stability of other supporting businesses or other industry sectors. Work-based training will also be linked to "in-demand occupations" that currently have, or that are projected to have, numerous positions. Individuals who fill these positions will achieve economic self-sufficiency and career advancement, which will significantly impact the local economy.

Finally, work-based training will be linked to developing and implementing industry sector strategies (e.g., industry partnerships, partnerships with small and large employers, regional skills alliances, industry skill panels, and sectoral skill partnerships). These strategies will a.)

address the skills needs of workers and employers; b.) provide the skilled workforce employers need; and c.) expand for job seekers employment and career opportunities in in-demand industry sectors or occupations.

To date, Oakland County has implemented several industry sector strategies to address the economic, workforce, and business needs of in-demand sectors. These efforts include:

- *Emerging Sectors:* Since its inception, the Oakland County Executive's Emerging Sectors initiative has generated \$4.6 billion in private investment, and it has created and retained nearly 82,000 jobs. Emerging Sectors in Oakland County have been identified as: Aerospace; Advanced Electronics; Advanced Materials, Chemicals and Nano; Automotive; Alternative Energy; Communications and Information Technology; Film and Digital Media; Robotics; Defense and Homeland Security; Finance, Insurance and Real Estate; and Health Care.
  - *Medical Main Street:* Oakland County is the global center of innovation for life sciences. The County Executive's regional Medical Main Street initiative works to ensure that companies have the resources necessary for businesses to grow, through collaborations with hospitals, universities and life science employers.
  - *Tech248:* Another initiative of the Oakland County Executive, Tech 248 harnesses the power of the 2,000 tech companies in Oakland County by: helping tech companies collaborate to attract, develop and retain talent while promoting Oakland County as a global technology hub; providing access to small business counseling, funding, and potential research and development/product development partners, suppliers, and customers of the 2,000 tech firms in Oakland County; and creating recognition for these companies, as the County promotes this innovation hub nationally and globally. In 2017, Tech 248 hosted an apprenticeship event that convened nearly 100 small IT businesses and partners. The MWA, in partnership with Oakland Schools, Automation Alley, the USDOL, and the Workforce Intelligence Network (WIN), described technical processes, resources, and funds that could help these employers launch apprenticeships.
  - *Manufacturing Day:* Since 2015, the MWA has partnered with the Oakland County Department of Economic Development and Community Affairs, Oakland Schools, and OCC, to host Manufacturing Day. In 2017, for example, more than 500 students from Oakland Schools' four Technical Centers and six local school districts toured 35 Oakland County employers and participated in hands-on, interactive tours. On October 5, 2018, the MWA and its partners will host the next annual Manufacturing Day.
  - *Twitter Chat:* In 2017, the MWA hosted its first Twitter Chat, which celebrated National Apprenticeship Week and featured seventeen employers and partners. The Chat reached 52,940 people and garnered 161,431 total impressions. In 2018, the MWA plans to schedule a Twitter Chat on careers in emerging technologies.
  - *MiCareerQuest Southeast:* In November 2018, more than 10,000 students will participate in MiCareerQuest Southeast, which the Oakland County MWA and the Oakland County Department of Economic Development and Community Affairs is leading, in partnership with five other MWAs across the region. Attendees will experience hands-on, interactive exhibits in the advanced manufacturing, health sciences, information technology, and construction industry sectors. The TIA/WDA is a presenting sponsor.
- To support a local workforce development system that meets the needs of local businesses, the Oakland County MWA will take the following actions:

- The MWA will continue to embrace the MWA's "Michigan Industry Cluster Approach (MICA)", which, according to TIA/WDA Policy Issuance (PI): 12-21, will "adapt the workforce system to produce and identify job ready candidates with the skill and competencies" targeted industry clusters [or sectors] demand. Accordingly, the MWA has targeted four such industry clusters: the Oakland County Executive's Emerging Sector industries; advanced manufacturing; health care; and connected mobility. To determine the top jobs and the skills job seekers need to obtain and retain these jobs in these sectors, the MWA conducted four "Skills Needs Assessment Projects", which electronically surveyed hundreds of employers. If the MWA can identify sufficient funding, other Skills Needs Assessment Projects may be conducted for other sectors (e.g., information technology).
- Each of the MWA's Michigan Works! Service Centers is required to have on its staff at least one business services representative who has been trained and certified through the "Business Solutions Professionals" training. These representatives constitute the MWA's "Business Services Team".
- The MWA's Business Services Team is led by a Business Services Coordinator who a.) coordinates and chairs the team's monthly meetings, b.) is the primary contact for the MWA's business services, and c.) is the MWA's business services liaison between the service centers and relevant partners (e.g., the TIA/WDA, the Michigan Economic Development Corporation, and the Oakland County Department of Economic Development and Community Affairs).
- The MWA's business services representatives provide employers with -- or refer them to -- the full array of business services that are described in Section 678.435 of the WIOA's Final Rule and the USDOL's Training and Employment Guidance Letter #16-16 ("One-Stop Operating Guidance for the American Job Center Network"). These services include recruiting, screening, assessing, and referring qualified candidates for available job opportunities; retention/expansion services; Fidelity Bonding; tax credit information; job fairs; labor market information; Rapid Response; human resources consultation services (e.g., writing and/or reviewing job descriptions); incumbent and new worker training through the Michigan Skills Trade Training Fund (STTF); employee outplacement services; and information about other employer-focused programs, including the Michigan Advanced Technician Training Program (MAT2) and Community Ventures. Since the STTF was created five years ago, the Business Services Team has obtained more than \$5 million in STTF grants for 197 employers, who have trained 2,929 new hires and retrained 5,245 incumbent workers.
- As the Oakland County MWA continues to implement the MICA, its Michigan Works! Service Centers have been and will be intricately involved. The centers' business services representatives, for example, identified and referred several advanced manufacturing employers for the MWA's Skills Needs Assessment Projects that are described above.
- To improve coordination between workforce and economic development, the MWA will build upon its already outstanding working relationship with the Oakland County Department of Economic Development and Community Affairs, one of whose divisions -- Workforce Development -- is the MWA's administrative entity. As noted elsewhere in this Plan Modification, the MWA and the Department have collaborated on numerous events and projects, including Tech248, Manufacturing Day, MiCareerQuest, Oakland Next, and MiTradeSchool.org.

Long known as a model for workforce and economic development collaboration, Oakland County has a fully integrated economic development and workforce system that addresses the entire scope of an employer's economic development needs. Joint meetings are held four times annually, bringing together economic development and workforce development partners to collaborate, improve service delivery, and enhance communication.

- The MWA will strengthen linkages between the one-stop delivery system and Unemployment Insurance (UI) programs, by providing specific accommodations and services to UI claimants who visit the Michigan Works! (WIOA One-Stop) Service Centers. These accommodations include a.) providing basic information or printed materials that describe unemployment compensation matters and b.) usage of office equipment, including fax machines, computers, and photocopying equipment, so that individuals can contact the Michigan Unemployment Insurance Agency (UIA). UI claimants may use office equipment for other purposes, at the discretion of the service center. The center will not give any verbal or written advice to UI claimants regarding their benefits or claims. The centers will restrict their activities to those that refer claimants to the UIA, by giving telephone numbers and official UIA brochures and pamphlets, and by allowing individuals to use the center's equipment to contact the UIA.

In addition, the UIA has provided, through the MOU that the Agency executed with the MWA, at least one designated customer telephone line in each of the MWA's one-stop centers. Claimants who use these lines dial a UI customer service representative directly and receive priority.

For the past three years, the MWA has operated the Reemployment Services and Eligibility Assessment (RESEA) Program, which provides RESEA services (e.g., assessment, individual service strategy development, and labor market information) for claimants who are deemed most likely to exhaust their UI benefits. The MWA expects to continue this program during Program Year 2018.

5. **A Description of a.) How the Workforce Development Board will Coordinate Local Workforce Investment Activities with Regional Economic Development Activities that are Operated in the Local Area and b.) How the Board will Promote Entrepreneurial Skills Training and Micro-Enterprise Services.**

a.) The Oakland County MWA will continue to build upon its successful relationships with several regional organizations that engage in economic development activities. These organizations include chambers of commerce and those that follow:

- Automation Alley – The Oakland County Workforce Development Board and several one-stop locations are members of this regional business organization. The MWA's Director serves on the Alley's Fund Board, and several Michigan Works! staff members serve on its workforce and education committee. In addition, Oakland County Michigan Works! has been a partner in multiple grants and supported several Alley-led initiatives, including "Superhighway to Success" and the Technical Talent Development Program. Work-based training opportunities have also been established through "Code Reconnect" and "Code Reconnect 2.0", two initiatives in which the MWA, Automation Alley, Kelly Services, and Oakland Community College (OCC) collaborated. Finally, the MWA and Automation Alley have partnered on various initiatives, including the Tech248 apprenticeship event that is described in Section B.4 of this Plan Modification.

- The Southeast Michigan Works! Agencies Council (SEMWAC) – The Oakland County MWA is a long-standing and active member of SEMWAC and utilizes this group for regional planning, coordination, grant applications, and regional workforce initiatives. SEMWAC has demonstrated success in obtaining National Dislocated Worker Grants and coordinating business services, rapid response, and case management activities.
- The Workforce Intelligence Network (WIN)– An active member of WIN, the Oakland County MWA uses this organization, which represents the region’s MWAs and community colleges, as a clearinghouse for regional grants, including the American Apprenticeship initiative, TechHire, InnoState, and, most recently, the “Advanced Michigan Catalyst” Program. This program provides participants case management, supportive services, and robotics technology training at various training institutions, including OCC. In addition, WIN provides regional workforce data and analytics that are useful to the career management and business services teams in the Oakland County Michigan Works! system.

b.) The Oakland County MWA promotes entrepreneurial skills training and micro-enterprise services by marketing -- and referring entrepreneurs to -- the Oakland County Business Center, which is a unit of the Oakland County Department of Economic Development and Community Affairs. This Center helps people start, manage, and grow small (for profit) businesses. Its experienced business consultants address business and marketing plans, financial management strategies, and other business services.

**6. A Description of the Local Area’s One Stop Delivery System, including:**

- Continuous Improvement of Eligible Service Providers – The Oakland County Workforce Development Board will implement the following strategies to ensure continuous improvement of its eligible service providers, and to ensure that they meet the employment needs of local employers, workers, and job seekers:
  - WIOA Performance Indicators – The Board will use the performance indicators that are delineated in Section 116 of the WIOA to evaluate its service providers, who will be contractually obligated to achieve the numerical goals the Board negotiates with the TIA/WDA. Providers who consistently fail to achieve and/or exceed these indicator goals may a.) receive technical assistance; b.) receive funding reductions; or c.) be eliminated. Conversely, providers who consistently achieve and exceed these goals may be rewarded with additional funding and asked to provide peer-to-peer technical assistance.
  - Training – The MWA’s service providers will be required to attend training sessions and technical assistance workshops/webinars that the TIA/WDA and/or the Michigan Works! Association provide. In addition, the MWA and/or Prosperity Region Ten will provide training for service providers. The MWA, for example, has trained service provider staff on workplace safety, mental health services, Equal Opportunity requirements, WIOA enrollment forms and procedures, and procurement rules and procedures. Service provider staff members have also attended customer and business services training that Prosperity Region Ten provided.
  - Peer-to-Peer Work Groups and Teams – In addition to the Business Services Team that is described in Section B.4 of this Plan Modification, the MWA has created several other service provider work groups to address particular topics and/or projects. These groups and teams encourage service provider staff members to

share best practices, and to develop common solutions and strategies. To date, work groups and teams have been formed for WIOA programs, the Employment Service (including veterans' services), Trade Act programs, and social media.

- Facilitate access to the One Stop delivery system's services, through the integration and use of technology and other means – The Oakland County Workforce Development Board will facilitate access to services through the following free on-line technology:
  - O\*NET: The O\*NET program is the nation's primary source of occupational information. Central to the program is the O\*NET database, which contains information on hundreds of standardized and occupation-specific descriptors. This free database, which is continually updated by surveying a broad range of workers from each occupation, forms the heart of O\*NET OnLine, an interactive application for exploring and searching occupations. The database also provides the basis for the MWA's Career Exploration Tools, a set of valuable assessment instruments for workers and students.
  - LearnKey: A premier global provider of self-paced education and training in the Microsoft Office Suite, LearnKey is self-paced, easy to use, and brings the classroom experience to the user – where and when he/she needs it.
  - Pure Michigan Talent Connect (PMTC) is an online marketplace that connects Michigan's job seekers and employers, and that links all public and private stakeholders who support Michigan's workforce. Pure Michigan Talent Connect is the state's electronic labor exchange system, which also provides information on job fairs, training, and career events.
  - MiTradeSchool.org: This web portal identifies more than 100 skilled and professional trade occupations that are linked to more than 100,000 job opportunities. The portal describes these jobs' educational requirements, median salaries, future openings, and training options and features the MWA's award-winning Apprenticeship Book and information on Manufacturing Day.
  - OaklandCountyMIWorks.com/AdvantageOakland.com: These websites provide information on -- and describe how to access the services of -- the Oakland County Michigan Works! Service Centers. The MWA's Apprenticeship Book and Skills Needs Assessment Project Reports also appear on these sites.
  - Social Media Platforms: The Oakland County MWA promotes job opportunities, career events, and labor market information to employers and job seekers, via Facebook and Twitter.

In addition to the foregoing on-line technology, each of the MWA's Michigan Works! (WIOA One-Stop) Service Centers is equipped with technology to assist individuals with disabilities. This technology may include, but is not limited to, the following:

- applications to Windows or other software, which enables customers to use a computer without a mouse or keyboard; to use text or visual alternatives for sounds; to change the screen's display for contrast; to adjust the keyboard; to magnify the screen; and to adjust the size of text;
- computer screen magnifiers;
- JAWS (Job Access With Speech);
- Braille printers;
- large keyboards;
- adjustable tables and chairs that accommodate wheel chair users; and
- the AT & T Language Line, which provides interpretive services for 500 languages.

During the next two years, the MWA will explore other ways in which technology can make its services more accessible to the public. The MWA may, for example, a.) establish kiosks in various facilities (e.g., libraries and chambers of commerce), where information can be obtained and b.) develop a mobile application, through which individuals can access and connect with career advisors.

- Compliance with the non-discrimination provisions of Section 188 of the WIOA and applicable provisions of the Americans with Disabilities Act of 1990 will be ensured by the following actions:
  - The Oakland County MWA has developed and implemented the following policies and procedures to ensure compliance:
    - a Sexual Harassment Policy;
    - an Equal Opportunity Policy;
    - a Limited English Proficiency Policy;
    - Discrimination Complaint Procedures;
    - a Disability Related Service Policy for Section 504 of the Rehabilitation Act of 1973, as amended;
    - a Reasonable Accommodation Policy and Procedures;
    - a Religious Accommodation Policy and Procedures; and
    - an Internal Complaint Resolution Process.
  - Mandatory Equal Opportunity (EO) training for all of the entities within the MWA's one-stop delivery system will ensure an understanding of and compliance with the MWA's EO operational policies, practices and procedures. The training will also include:
    - a basic orientation to the nondiscrimination and EO provisions of Title VI of the Civil Rights Act of 1964, Section 188 of the WIOA, 29 Code of Federal Regulations (CFR) Part 38, and TIA/WDA Policy Issuance (PI) #18-09 ("Non-discrimination and Equal Opportunity Requirements");
    - an overview of Section 504 of the Rehabilitation Act of 1973 and other federal disability (the Americans with Disabilities Act) requirements; and
    - a component on the prohibition against discriminatory/sexual harassment, gender discrimination, and workplace violence.
  - The MWA will sponsor EO training events (e.g., the Equal Employment Opportunity Commission's compliance training and diversity training) for the foregoing entities.
  - The MWA's EO Officer will attend EO training that the TIA/WDA and/or the Michigan Works! Association provide.
  - The MWA will periodically evaluate its Michigan Works! (WIOA One-Stop) Service Centers to determine whether their current facilities, programs, services, materials, communication systems, technology, and agency employment practices comply with federal physical and programmatic accessibility standards.
  - As the MWA's EO Officer serves as a technical resource and oversees the MWA's EO system, he/she will assume the responsibilities that are delineated in TIA/WDA PI #18-09. The EO Officer will, for example, submit to the TIA/WDA a.) an ADA/One-Stop Accessibility Checklist for each of the MWA's Michigan Works! One-Stop Service

Centers and b.) statistical worksheets that analyze the race/ethnicity, sex, limited English proficiency, preferred language, age, and disability status for all covered individuals within the MWA.

- The MWA will enhance its excellent working relationship with the Oakland District Offices of Michigan Rehabilitation Services (MRS). The MWA routinely makes referrals to, and receives referrals from, MRS counselors who offer testing, assessment, case management and other wrap-around services that align with the services the MWA's Michigan Works! Service Centers provide.
- The Michigan Bureau of Services for Blind Persons has provided training at each of the MWA's Michigan Works! Service Centers. These sessions trained service center staff members on how to serve and support blind or visually impaired persons.
- The roles and resource contributions of the one stop partners - The roles and resource contributions of the MWA's one-stop partners are delineated in MOUs that the Oakland County Workforce Development Board and the County Executive executed with the one-stop partners identified in Section B.2 of this Plan Modification. The MOUs are described in Section B.1.

## **7. A Description and an Assessment of the Local Area's Adult and Dislocated Worker Employment and Training Activities:**

- Description: The following adult and dislocated worker employment and training activities are available in the Oakland County MWA:
  - a. **Career Services** are identified in: Section 134(c)(2) of the WIOA; Section 680.150 of the WIOA's Final Rule; Section 678.430 of the WIOA's Final Rule; Section 5.C. of TEGL #16-16 ("One-Stop Operations Guidance for the American Job Center Network"); and TIA Policy Issuance (PI): #15-30, Change 1 ("Certification Criteria for Michigan Works! Service Centers").

At a minimum, career services will include the following basic, individualized, and follow-up services, which can be provided in any order, without regard to sequence:

- 1.) Basic Career Services are universally accessible and must be made available to all individuals who seek employment and training services. These services require less staff time and involvement and include:
  - eligibility determination for enrollment in the WIOA adult program, and for co-enrollment in the WIOA dislocated worker and youth programs;
  - outreach and intake (including identification through the Reemployment Services and Eligibility Assessment Program) and orientation to the one-stop delivery system's information and services (including Temporary Assistance for Needy Families (TANF) assistance);
  - initial assessment of customer skill levels (including literacy, numeracy, and English language proficiency); aptitudes; abilities (including skill gaps); and supportive services needs;
  - labor exchange services, including job search and placement assistance and, when a customer needs it, career counseling (e.g., information on in-demand industry sectors and occupations, non-traditional employment, and career profiles and interest inventories);

- business services (e.g., employee recruitment and screening) for employers;
- referrals to, and coordination of activities with, WIOA partner programs and, when appropriate, other workforce development programs;
- disseminating accurate local, regional, and national workforce and labor market employment statistics information, including job vacancies in labor market areas and information on the earnings, skill requirements, and advancement opportunities for demand occupations;
- provision of performance and program cost information on a.) eligible training providers, by program and type of providers, and b.) workforce services, by program and type of providers;
- provision of information, in usable and understandable formats and languages, on the MWA's WIOA performance accountability measures, and on any other additional performance information that relates to the MWA's American Job Center Network;
- provision of information, in usable and understandable formats and languages, on the availability of supportive services or assistance, and on appropriate referrals to such services and assistance, including child care; child support; medical or child health assistance through Michigan's Medicaid and Children's Health Insurance Programs; benefits under the Supplemental Nutrition and Assistance Program; earned income tax credit assistance; HUD housing counseling and assistance services; and Temporary Assistance for Needy Families (TANF) assistance;
- assistance in establishing eligibility for non-WIOA-funded training and education programs, and in eligibility for financial assistance for these programs; and
- provision of information and meaningful assistance on filing claims under Unemployment Insurance (UI) programs. "Meaningful assistance" is defined in Section 5.C.1. of TEGF #16-16; in TIA PI #15-30, Change 1; and in Section 678.430 (a)(10)(i)(A) of the WIOA's Final Rule.

2.) Individualized Career Services must be provided after a staff member determines that the participant needs them to retain or obtain employment. These services, which generally involve significant staff time and customization, include:

- comprehensive and specialized assessments (e.g., diagnostic testing, specialized assessments, and in-depth interviewing and evaluation) of a customer's skills levels, employment barriers, and appropriate employment goals;
- in consultation with a career planner, Individual Employment Plan (IEP) development, which is an on-going strategy to identify the customer's employment goals, appropriate achievement objectives, and the appropriate combination of services, (e.g., "Career Pathways") he/she needs to achieve these goals;
- group counseling, which involves two or more participants who address issues, problems, or situations that group members share;

- mentoring and individual counseling, which is a one-on-one session that may explore in greater detail a participant's issues, problems, or situations;
- career planning (e.g., case management, as defined in Section 3 (8) of the WIOA);
- short-term prevocational services (e.g., learning, communication, personal maintenance, and interviewing skills; punctuality; and professional conduct services) to prepare individuals for unsubsidized employment or training;
- financial literacy services, which are described in Section 129(b)(2)(D) of the WIOA, and in Section 681 of the WIOA's Final Rule, and which include:
  - Supporting participants' ability to create household budgets, initiate savings plans, and make informed financial decisions about education, retirement, home ownership, wealth building, or other savings goals; and
  - Supporting participants' ability to manage spending, credit, and debt, including credit card debt, effectively;
- workforce preparation activities, as described in Section 463.31 of the WIOA's Final Rule, and which include programs or services that help customers acquire the basic academic, critical thinking, digital literacy, and self-management skills they need to enter and complete post-secondary education, training, or employment;
- out-of-area job search and relocation assistance;
- English language acquisition programs, as described in Section 463.31 of the WIOA's Final Rule;
- integrated and education and training programs, as described in Section 463.35 of the WIOA's Final Rule; and
- Internships and work experience that are linked to careers and transitional jobs.

Section 680.180 of the WIOA's Final Rule provides the following definition for internships and work experience:

"An internship or work experience is a planned, structured learning experience that takes place in a workplace for a limited period of time. Internships and other work experience may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. An internship or other work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience setting where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists."

In accordance with Section 134(d)(5) of the WIOA; Section 680.190 of the WIOA's Final Rule; TEGL #19-16 ("Operating Guidance for the WIOA Title I Adult and Dislocated Worker Programs"); and TIA PI: #15-30, Change 1, Transitional Jobs are time-limited work experiences that subsidize up to 100 percent of the participant's wages, and that are in the public, private, or non-profit sectors.

Combined with comprehensive career and supportive services, these jobs are available for individuals who have employment barriers (e.g., the long-term unemployed, ex-offenders, and individuals who receive (or who have exhausted) TANF benefits), and who a.) are chronically unemployed or b.) have an inconsistent work history, as determined by the Oakland County Workforce Development Board.

No more than 10 percent of the MWA's WIOA adult and dislocated worker funds can be used for Transitional Jobs, which are also designed to help the foregoing individuals establish a work history, demonstrate work success within the context of an employee-employer relationship, and develop workplace skills that lead to entry and retention in unsubsidized employment. Transitional jobs do not require that the employer retain the participant after he/she completes his/her transitional job, but, where appropriate, retention is preferred. The program service provider generally acts as the employer for transitional jobs.

- 3.) Follow-up Career Services, as described in Sections 678.430(c), 361.430(c), and 463.430(c) of the WIOA's Final Rule. Follow-up services must be provided, as appropriate, for adult and dislocated worker program participants who are placed in unsubsidized employment, for up to twelve months after their first day of employment. Counseling about the work place is an appropriate type of follow-up service. Follow-up services do not extend the date of exit in performance reporting.

- b. **Training Services**, which are identified in Section 134(c)(3)(D) of the WIOA; in Sections 680.200 through 230 and 680.300 through 350 of the WIOA's Final Rule; and in TEGL #19-16, will be provided to adults and dislocated workers who, after an interview, evaluation or assessment, and career planning, have been determined to a.) be unlikely or unable to obtain or retain employment that leads to economic self-sufficiency, or to obtain wages that are comparable to or higher than wages from their previous employment, if these individuals received only career services; b.) need training services to obtain or retain the foregoing employment; c.) have the skills and qualifications to participate successfully in training services; d.) have selected a training program that is directly linked to the employment opportunities of a local or regional area, or of another area to which the individual will commute or relocate; e.) be unable to obtain other grant assistance (e.g., state-funded training grants and Federal Pell grants) for such training, or who need assistance beyond what is available from these other sources to pay for such training; and f.) are eligible to receive funding for WIOA training services.

An individual who meets the foregoing criteria is also eligible for WIOA training, if he/she is a member of a worker group covered under a petition that a.) is filed for Trade Adjustment Assistance and b.) is awaiting a determination. If the petition is subsequently certified, the worker may transition to TAA-approved training. If the petition is denied, the worker will continue training under the WIOA.

If a participant is eligible and qualifies for training, the MWA can determine that training services are appropriate for him/her, even if he/she has not first received basic or individualized career services; a sequence of services is not required.

WIOA training services include the following:

- 1.) programs that provide workplace training with related instruction (e.g., registered apprenticeships and cooperative education programs);

- 2.) skill upgrading and retraining;
- 3.) entrepreneurial training programs (excluding registered apprenticeships and Transitional Jobs) that assist customers who are seriously interested in becoming self-employed by starting a business in Michigan;
- 4.) job readiness training that is combined with occupational skills training (excluding registered apprenticeships);
- 5.) adult education and literacy activities that are combined with occupational skill training (excluding registered apprenticeships and Transitional Jobs);
- 6.) customized training that is conducted with an employer's commitment to employ the trainee after he/she successfully completes the training;
- 7.) occupational skills training, including training for nontraditional employment, that, with few exceptions, is accessed through "individual training accounts"; and
- 8.) on-the-job training.

WIOA definitions for individual training accounts and on-the-job training follow:

- Individual Training Accounts (ITAs): Section 134 of the WIOA states that an individual who seeks training services and who is eligible may, in consultation with a career planner, select an eligible provider of training services from a list of providers. According to Section 680.300 of the WIOA's Final Rule, this consultation will a.) include a discussion about program quality and b.) provide information about the performance of available eligible training providers (ETPs). Upon selection, the MWA's service provider will, to the extent practicable, refer such an individual to the eligible provider of training services and arrange for payment for such services through an individual training account. Section B.22 of this Plan Modification provides additional information about ITAs.
- On-the-Job Training (OJT): According to Section 3 (44) of the WIOA, the term "on-the-job training" means training that an employer provides to a paid participant while he/she is engaged in productive work in a job that:
  - provides knowledge or skills essential to the full and adequate performance of the job;
  - is made available through a program that provides the employer reimbursement of up to 50 percent (or, under certain conditions, up to 75 percent) of the participant's wage rate for the extraordinary costs the employer incurs as he/she provides the training and the additional supervision that is related to the training; and
  - is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account skill requirements of the occupation, the content of the training, and the participant's prior work experience, academic and occupational skill level, and individual employment plan.

- c. **Supportive Services** (e.g., transportation, child care, dependent care, housing, and needs-related payments) that are necessary to enable an individual to participate (and who is participating) in WIOA individualized career and/or training services. Participants who receive only basic career services, or who receive follow-up services are not eligible for and cannot receive supportive services. In addition, the individual must be unable to obtain these supportive services through other programs that provide such services.
- d. **Assessment** – The MWA and its one-stop partners provide adults and dislocated workers quality employment and training services. The MWA, for example, is meeting and exceeding all WIOA adult and dislocated worker performance indicator goals for Program Year 2017. In addition, the MWA has implemented several innovative projects and programs, including the award-winning Apprenticeship Books and Skills Needs Assessment Projects, which are described elsewhere in this Plan Modification; a “Veteran Reboot Project”, which is a collaboration with the Oakland County Veterans’ Services Division to connect veterans with employers; and “Money Smart Week”, during which the MWA partners with the Federal Reserve Bank to host money management seminars at the Michigan Works Service Centers.

The quantity of adult and dislocated worker services, however, continues to be curtailed, due to funding reductions that the MWA and many core partners have absorbed. During Program Years 2016 and 2017 (i.e., July 1, 2016 through June 30, 2018), the MWA sustained the following decreases to programs that serve adults and dislocated workers:

Program	Amount of Decrease	Percentage Decrease
WIOA Adult	\$ 420,543	17%
WIOA Dislocated Worker	343,184	12%
TANF Welfare-to-Work	538,644	13%
Food Assistance Employment and Training	64,400	23%
Totals	\$1,366,771	14%

Although the MWA was allocated a small \$20,768 (or two percent) increase to its Wagner-Peyser Employment Service Program, this amount does not off-set the \$533,014 (or 33 percent) reduction the MWA received in Program Year 2015.

The Consolidated Appropriations Act of 2018, which the President recently signed into law, identifies the following modest increases or level funding for programs that serve adults and dislocated workers:

Program	Amount	Percentage
WIOA Adult	\$ 36 million	3.7%
WIOA Dislocated Worker	\$ 20 million	2%
Senior Employment Service	Level Funding	0%
Offender Re-entry Grants	\$ 5 million	5.7%
Jobs for Veterans State Grants	\$ 5 million	2.9%
Adult Education and Literacy Activities	\$ 35 million	6%
Community Services Block Grants	Level Funding	0%
Community Development Block Grants	\$ 300 million	10%
TANF	Level Funding	0%
Vocational Rehabilitation	\$ 144 million	1.6%

Significantly, local Program Year 2018 allocations or these programs may or may not reflect these increases, depending on statutory or administrative formulas. In addition, the Consolidated Appropriations Act decreases the Wagner-Peyser Employment Service by \$5 million (or one percent).

**8.a. A Description and Assessment of the Type and Availability of the Local Area's Youth Workforce Investment Activities, including Successful Models:**

- **Description:** The following youth workforce investment activities are available in the Oakland County MWA:
  - 1.) Program Services:
    - a.) outreach, intake, and orientation to the one-stop delivery system's information and youth services;
    - b.) eligibility determination of out-of-school and in-school youth, in accordance with Sections 129(a)(1)(B) and 129(a)(1)(C) of the WIOA; Subpart B of Part 681 of the WIOA's Final Rule; TEGL #21-16 ("WIOA Title I Youth Program Guidance"); and the TIA/WDA's WIOA Manual;
    - c.) in accordance with Section 129 (c)(1)(A) of the WIOA and Section 681.420 (a)(1) of the WIOA's Final Rule (and for the purpose of identifying each participant's appropriate services and career pathways), an objective assessment of his/her academic and occupational skill levels, service needs and strengths, by reviewing his/her basic academic and occupational skill levels, prior work experience, employability, strengths, interests, aptitudes, and supportive services and developmental needs;
    - d.) in accordance with Section 129(c)(1)(B) of the WIOA and Section 681.420(a)(2) of the WIOA's Final Rule, individual service strategy development and, as needed, updates that 1.) are informed by the participant's needs and objective assessment; 2.) are directly linked to one or more of the WIOA performance indicators; 3.) consider career planning; and 4.) identify and prescribe for the participant career pathways, education and employment goals, achievement objectives, and services;
    - e.) case management that includes follow-up services; and
    - f.) the provision of:
      - activities that lead to a secondary school diploma or a recognized post-secondary credential;
      - preparation for post-secondary educational and training opportunities;
      - strong linkages between academic instruction and occupational education that lead to recognized post-secondary credentials;
      - preparation for unsubsidized employment opportunities; and
      - connections to employers, including small employers, in-demand industry sectors, and labor-market relevant occupations.
  - 2.) Program Elements: To support his/her attainment of a secondary school diploma, entry into post-secondary education, and career readiness, the following elements will be made available to each participant:

- a.) Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to a secondary school diploma or its recognized equivalent, or to a recognized post-secondary credential – These strategies, which can be provided one-on-one or in a group setting, provide academic support, help youth identify areas of academic concern and overcome learning obstacles, and provide tools and resources to develop learning techniques. Secondary school dropout prevention strategies (e.g., tutoring, literacy development, active learning experiences, after-school opportunities, and individualized instruction) include services and activities that keep youth in school and engaged in a formal learning and/or training setting.
- b.) Alternative secondary school services or dropout recovery services – Alternative secondary school services (e.g., basic education skills training, individualized academic instruction, and English as a Second Language training) assist youth who have struggled in traditional secondary education. Dropout recovery services (e.g., credit recovery, counseling, and educational plan development) assist youth who have dropped out of school.
- c.) Occupational skills training – In accordance with Section 681.540 of the WIOA's Final Rule, occupational skill training is an organized program of study that 1.) provides specific vocational skills; 2.) leads to proficiency in performing actual tasks and technical functions that certain occupational fields require at entry, intermediate, or advanced levels; and 3.) prioritizes programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations. Occupational skills training must:
- be outcome-oriented and focused on an occupational goal specified in the participant's individual service strategy;
  - be of sufficient duration to impart the skills needed to meet the occupational goal; and
  - lead to the attainment of a recognized postsecondary credential.
- d.) Education that is offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster – This element is an integrated education and training model that refers to the concurrent delivery of workforce preparation activities (e.g., work experience); basic academic skill development (e.g., basic education skills training); and occupational skills training (e.g., vocational skills training).
- e.) Leadership development opportunities – These opportunities (e.g., exposure to post-secondary education opportunities, community and service learning projects, peer mentoring and tutoring, team leadership training, life skills training in parenting and work behavior, and civic engagement activities) encourage responsibility, confidence, employability, self-determination and other positive social behaviors.
- f.) Supportive services – These services enable an individual to participate in WIOA activities and include, but are not limited to: transportation; child and dependent care; housing assistance; legal aid services; payments and fees for employment and training-related applications, tests, and certifications; assistance with books, fees, and school supplies; work attire; and work-related tools (e.g., eye glasses and protective eye gear).
- g.) Adult mentoring – This element is structured guidance from an adult for the period of the youth's WIOA participation, and for a period subsequent to his/her participation, for a total of not less than twelve months. While group and electronic mentoring activities

are allowable, a youth must also be mentored by a screened individual with whom the youth interacts face-to-face.

- h.) Follow-up services – Follow-up services must occur for not less than twelve months after the youth exits from his/her WIOA participation, unless the participant 1.) declines the follow-up services or 2.) cannot be located or contacted. Follow-up services help ensure that the youth is successful in employment and/or postsecondary education and training and may include regular contact with a participant's employer, including assistance in addressing work-related problems. Follow-up services include the following program elements, if they occur after the participant's exit date: supportive services; adult mentoring; financial literacy education; services (e.g., career awareness, career counseling, and career exploration) that provide labor market and employment information about in-demand industry sectors or occupations in the local area; and activities that help youth prepare for and transition to postsecondary education and training.
- i.) Comprehensive guidance and counseling – This element may include mental health counseling, drug and alcohol abuse counseling, and referrals to partner programs, as appropriate. This counseling can be provided directly, when sufficient funds exist, or by referral to other organizations, with which the MWA must coordinate service delivery.
- j.) Financial literacy education – This element includes numerous activities (e.g., helping participants manage spending, credit, identity theft, and debt), which are identified in Section 681.500 of the WIOA's Final Rule, and in TEGl #21-16.
- k.) Entrepreneurial skills training – This training (e.g., entrepreneurial education on the values and basics of starting and running a business) teaches various skills (e.g., marketing, budget development, and forecasting resource needs).
- l.) Services that provide labor market information – These services provide labor market and employment information (e.g., career awareness, career counseling, and career exploration services) that is available through federal (e.g., My Next Move and Bet My Future), state (e.g., MiTalent.org), and local (e.g., MiTradeschool.org) sources.
- m.) Post-secondary preparation and transition activities – These activities (e.g., exploring postsecondary education options, SAT/ACT test preparation, preparing college admission applications, and searching and applying for scholarships and grants) help youth prepare for and transition to postsecondary education and training.
- n.) Paid and unpaid work experiences – These experiences include summer and school year employment opportunities, pre-apprenticeship programs, internships, job shadowing (e.g., an expanded informational interview), and on-the-job training that have as a component academic and occupational education. Section 681.600 of the WIOA's Final Rule provides the following definition for work experience:

“Work experiences are a planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists.

[In accordance with Section 680.840 of the WIOA's Final Rule], funds provided for work experiences may not be used to directly or indirectly aid in the filling of a job opening that is vacant because the former occupant is on strike, or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage. Section 683.270 of the WIOA's Final Rule describes other safeguards to ensure that WIOA participants do not displace other employers.

Work experiences provide the youth participant with opportunities for career exploration and skill development. [In addition], work experiences must include academic and occupational education. The educational component may occur concurrently or sequentially with the work experience. Further, academic and occupational education may occur inside or outside the work site."

The work experience employer can provide the academic and occupational components, or they may be provided separately in the classroom, or through other means. The academic and occupational education components refer to contextual learning that accompanies a work experience. The components include the information necessary to understand and work in specific industries and/or occupations. TEGl #21-16 provides examples of contextual learning for both the academic and occupational components.

- **Assessment** – The MWA and its partners provide quality youth employment and training services. The MWA, for example, is meeting and exceeding its WIOA youth performance indicator goals for Program Year 2017. In addition, the MWA has collaborated with core partners to implement several youth initiatives (e.g., Manufacturing Day and MiCareer Quest) that are described elsewhere in this Plan Modification.

The quantity of youth services, however, continues to be curtailed, due to funding reductions that the MWA and many core partners have absorbed. During Program Years 2016 and 2017 (i.e., July 1, 2016 through June 30, 2018), the MWA sustained a \$503,703 (or 20 percent) decrease to its WIOA Youth Program.

The Consolidated Appropriations Act of 2018 identifies the following modest increases for programs that serve youth:

Program	Amount	Percentage
WIOA Youth	\$ 30 million	3.4%
Adult Education Literacy Activities	\$ 35 million	6%
Career and Technical Education	\$ 75 million	6.7%
YouthBuild	\$ 5 million	6%
Job Corps	\$ 14.5 million	1%

Significantly, local Program Year 2018 allocations for these programs may or may not reflect these increases, depending on statutory or administrative formulas.

- **Successful models** – The MWA recently rebranded its WIOA Youth Program as "OaklandNext", the Oakland County Executive's initiative to acquaint youth with -- and prepare them for -- the 21<sup>st</sup> Century's rewarding and diverse jobs. To implement the "OaklandNext" brand, the MWA has:
  - participated in an OaklandNext event that featured several speakers, including the MWA's Director, who spoke about their career paths;

- created marketing materials that promote WIOA youth services, including internships, tuition assistance, apprenticeships, job search assistance, and resume writing, and that identify the MWA's Michigan Works! One-Stop Service Centers;
- developed marketing materials that identify the MWA's top jobs in the skilled trades, business and finance, health care, information technology, transportation and logistics, and connected mobility industry sectors; and
- implemented several new youth programs, including Manufacturing Day and MiCareerQuest Southeast, which are described elsewhere in this Plan Modification, and a Medical Assistant Apprenticeship, which is a partnership among the Oak Park Michigan Works! (WIOA One-Stop) Service Center, the Henry Ford Health System, Oakland Community College and Henry Ford College.

During the next two years, the MWA will take additional actions to market, consolidate, enhance, and deliver its WIOA youth services under the OaklandNext brand.

**8.b. The Local Area's Definition for "Requires Additional Assistance":**

To be eligible for WIOA services, certain in and out-of-school youth must "require additional assistance to enter or complete an education program, or to secure or hold employment". The Oakland County MWA's definition for this criterion follows:

"To be eligible for WIOA services, applicable in and out-of-school youth must require additional assistance to enter or complete an education, or to secure or hold employment. Such youth must:

- have repeated at least one secondary grade level, or be one year over age for their grade; or
- have a core grade point average of less than 1.5; or
- for each year of secondary education, be at least two semester credits behind the rate required to graduate from high school; or
- be an emancipated youth; or
- have aged out of foster care; or
- be previous high school dropouts, have been suspended five or more times, or have been expelled; or
- have court/agency referrals that mandate school attendance; or
- be deemed at risk of dropping out of school by a school official; or
- have been referred to or are being treated by an agency for a substance abuse related problem; or
- have experienced recent traumatic events, be victims of abuse, or reside in an abusive environment, as documented by a school official or other qualified professional; or
- have serious emotional, medical or psychological problems, as documented by a qualified professional; or
- have never held a job (if an older youth); or
- have been fired from a job within the 12 months prior to applying for WIOA services (if an older youth); or
- have never held a full-time job for more than 13 consecutive weeks (if an older youth).

**9. Information on Waivers the Local Area Will Use:**

In 2017, the State of Michigan sought a waiver from Section 129(a)(4)(A) of the WIOA, and from 20 Code of Federal Regulations (CFR) 681.410. These sections of the Act and its regulations require that not less than 75 percent of the funds allocated to states 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 the funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for out-of-school youth (OSY). The USDOL approved the waiver on January 2, 2018.

Specific impacts of the waiver follow:

- The requirement to expend 75 percent of WIOA Title I Youth State Formula Funds on the OSY population has been waived. Michigan received approval to lower this amount to 50 percent.
- The requirement that local WIOA Title I Youth funding must meet the 75 percent minimum spending requirement has been waived. Michigan received approval to lower this amount to 50 percent.
- The requirement to expend 75 percent of WIOA Title I Statewide Activities funding on the OSY population has been waived. Michigan received approval to lower this amount to 50 percent. This lower percentage will allow funding flexibility for special youth projects that meet the state's vision and mission.

The Oakland County MWA adopts and will use the foregoing waiver, which remains valid until the State's WIOA Unified Plan and the MWA's WIOA Four-Year Local Plan expire on June 30, 2020.

**10. A Description of How the Local Board will Coordinate Relevant Secondary and Post-Secondary Education Programs and Activities to Coordinate Strategies, Enhance Services, and Avoid Duplication of Services:**

The Oakland County Workforce Development Board will coordinate relevant secondary and post-secondary education programs and activities by implementing the following strategies:

- Some of the Oakland County MWA's Michigan Works! (WIOA One-Stop) Service Centers are affiliated with public K-12 school districts that also operate relevant career and technical education programs. Coordination at these Centers will be easily achieved.
- The MWA has forged a productive relationship with Oakland Schools, the County's intermediate school district, which oversees career and technical education and the County's four technical campuses. Section B.4 of this Plan Modification describes various projects (e.g., Manufacturing Day and the Tech 248 apprenticeship event) on which Oakland Schools and the MWA have collaborated.
- The MWA contracts with Oakland Community College to provide various services, including basic assessment, career pathway development, service center staff training, and employer engagement for work-based learning opportunities.
- The MWA's Director staffs the Oakland County Business Roundtable's Workforce and Education Committee, which makes education-related recommendations to the County Executive. The Director of Oakland Schools' Career Focused Education and representatives

from numerous post-secondary institutions (e.g., Oakland Community College, Oakland University, Baker College, Lawrence Technological University, and Walsh College) serve on this Committee.

- The MWA and its Michigan Works! Service Centers have developed excellent working relationships with the foregoing secondary and post-secondary institutions and numerous proprietary schools (e.g., New Horizons, Carnegie Institute, and the Michigan Manufacturing Technology Center), as these institutions train and award credentials to the MWA's customers. The MWA will enhance these relationships.
- Services that the MWA's secondary and post-secondary career and technical education programs provide (and strategies for aligning these services with the MWA's Michigan Works! (One-Stop) Service Centers) are identified and described in the MOUs the Workforce Development Board and the County Executive negotiated and executed with these programs. The MOUs, for example, identify procedures for referring customers to and from the MWA's service centers and career and technical education programs.
- In accordance with TIA/WDA Policy Issuance (PI): #17-24, the MWA's Career and Educational Advisory Council (CEAC) will a.) advise the Oakland County Workforce Development Board on "education-related items" and b.) "review and comment" on secondary and post-secondary education plans. The CEAC's members include representatives from Oakland Schools, Baker College, Lawrence Technological University, and the Birmingham, Troy, and Walled Lake School Districts.

#### 11. **Supportive Services and Needs-Related Payments:**

The Oakland County MWA will provide supportive services and it may provide needs-related payments. The MWA's procedures for these services follow:

##### **Supportive Services:**

Supportive services are services and/or referral to services that are necessary to enable an individual to participate in activities authorized under Title I of the Workforce Innovation and Opportunity Act (WIOA). The Oakland County MWA's service providers will offer and, as appropriate, provide supportive services through referral, and, as a last resort, with WIOA supportive service funds. In addition to the per service guidelines identified below, a per person supportive services guideline of \$1,500 has been established.

a. **Specific Features** -Specific features about the MWA's supportive services follow:

- 1.) **Procedures for Referral** – To ensure resource and service alignment, the MWA's service providers will provide adults accurate information on the availability of supportive services, including, at a minimum, childcare and transportation, that are available through other organizations, including WIOA One-Stop partners, in the MWA. When it is a basic career service, this information will be provided to the individual on a self-directed basis. The individual, in other words, will be responsible for accessing the supportive services that benefit him/her.

If it provides a WIOA participant with a comprehensive and specialized assessment (i.e., an individual career service), the service provider will identify the individual's barriers and supportive service needs on his/her objective assessment form and/or on his/her individual employment plan (IEP). Supportive service referrals that the service provider makes on the participant's behalf will, as appropriate, be identified on his/her objective assessment form and/or on his/her IEP. If the service provider determines that a participant cannot access

the supportive services he/she needs through a referral to a WIOA One Stop Partner or to other agencies, WIOA funds may provide the service, in accordance with the MWA's limits and guidelines, which are delineated above and below.

- 2.) Provision of Accurate Information on the Availability of Supportive Services – The MWA's service providers will be contractually required to compile and provide participants accurate information on the availability of supportive services at other organizations, including WIOA One-Stop partners. This information will include the name, address, and telephone number of the agency, the supportive service it provides, and its eligibility requirements. The MOUs that the MWA has executed with its One Stop Partners facilitate this referral process.
  - 3.) Referral to Supportive Services – As noted above, the MWA's service providers will provide participants appropriate information on supportive services. While the service provider may arrange supportive service appointments for those participants on whom an objective assessment has been conducted, the ultimate responsibility for making and keeping such appointments (and for benefiting from a supportive service) lies with the participant.
- b. Conditions and Limits for Supportive Services – The Oakland County Workforce Development Board (WDB) has established the following conditions and limits for the provision of supportive services:

For WIOA-funded supportive services to be determined as “necessary” to enable an individual to participate in activities, a WIOA participant must meet all of the conditions listed below at the time of his/her request for assistance:

- Services must be in response to a barrier documented in his/her objective assessment/individual employment plan.
  - Services must be necessary to enable the individual to participate in or complete such activities as unsubsidized employment, work experience, basic skills training, or occupational training.
  - Services cannot be obtained through other programs that provide such services.
- c. Guidelines for the Provision of Supportive Services - In addition to the foregoing conditions and limits, the WDB has established the following guidelines on the provision of supportive services:
- 1.) each time a participant requests WIOA-funded supportive services, the MWA's service providers must determine if he/she is actively participating in good standing in an appropriate WIOA activity;
  - 2.) the service provider will document the provision of supportive services in the participant's Individual Service Strategy (ISS);
  - 3.) individuals who are eligible for and able to receive a given supportive service from a Partnership. Accountability. Training. Hope. (PATH) program are not eligible to receive that supportive service through WIOA funds;
  - 4.) the dollar amount that is spent on a given WIOA-funded supportive service will parallel the overall cap or the dollar amounts and durations that are established for a given PATH supportive service;
  - 5.) as noted above, the amount of supportive services will not exceed \$1,500 per person;
  - 6.) the service provider will ensure that acceptable accounting procedures are used in the provision of supportive services; and
  - 7.) supportive services will be available in a menu format and will meet the following descriptions and guidelines:

- Transportation: Travel to and from the participant's home/work/school to a childcare provider, education facility, job search services, training site, job interview, job or other necessary and related location. Guidelines: a range of 20 cents to 40 cents per mile (and not to exceed \$25 per week) for the use of a private vehicle or the actual cost for public transportation (e.g., bus tokens, taxi fares, etc.). Transportation may not exceed \$1,200 within a 12 month period.
- Automotive Repair: The vehicle must be needed to get the participant to and from employment or training and must be registered and insured in the name of the individual or a member of his/her immediate family. The cost of the repair cannot exceed the retail value of the vehicle, as quoted in the latest issue of the N.A.D.A. Appraisal Guide or the Kelly Blue Book. In addition, there must be a reasonable expectation that the repair will make or keep the vehicle safe and road worthy in the professional opinion of the repair facility. The repair must be authorized and approved in advance by the service provider. Guidelines: The maximum expenditure for automotive repairs is \$1,200 within a 12 month period.
- Automotive Insurance: The vehicle must be needed to get the participant to and from employment or training and must be registered and insured in the name of the individual or a member of his/her immediate family. Guidelines: Maximum of 3 months.
- Child/Dependent Care: Child/Dependent Care must be needed for training, study, employment, or other employment/training related requirements. Guidelines: The child/dependent care facility must be licensed by the Michigan Department of Health and Human Services (MDHHS), and fees must be competitively priced. Child/dependent care assistance is limited to stop gap interventions that include a predictable outcome of success, which is defined as having the ability to sustain child/dependent care payments once WIOA assistance is exhausted. Childcare expenditures may not exceed a maximum of three months at 70% of the actual cost, or \$1,200 within a 12 month period.
- Housing Payments: Provides assistance in maintaining or obtaining adequate shelter for individuals and their dependents or parents or legal guardian. This assistance will enable the individual to participate in registered WIOA career or training services. Housing payments must be reasonable and limited to stop gap interventions that include a predictable outcome of success, which is defined as having eliminated or significantly mitigated the probability of eviction or foreclosure in the near future. Guidelines: Cannot exceed 3 months or \$1,500 within a 12 month period.
- Medical Services: Medical services are limited to the identification, treatment, or correction of physical, mental, and dental problems that will enable the participant to participate in WIOA services or unsubsidized employment. Examples of such services include prescriptions, pre-employment examinations, or required tests or immunization. Guidelines: Medical payments cannot exceed \$1,200 within a 12 month period.
- Other Miscellaneous Services: Other miscellaneous services provide financial support for such items as uniforms, work tools, work/interview clothing, and required licensing or certifications. All requests must be necessary, reasonable and needed by the participant to enter or complete training, obtain or retain employment, or meet other employment/training related requirements. Guidelines: The maximum expenditure for other miscellaneous services is \$500 within a 12-month period.

- 8.) For participants in good standing (e.g., good attendance and grades, follow-through and follow-up), the allowable duration that supportive services may be provided will be from the date of the participant's registration into a WIOA activity through his/her entered employment and retention period. If, however, the participant is not in good standing or is unemployed at exit and remains or is reasonably predicted to remain unemployed throughout the quarter in which he/she is expected to enter employment, his/her access to supportive services will be terminated in a timely and responsible manner.

Since all of the foregoing standards for supportive services are operational guidelines, as opposed to eligibility determination for or strict limits on supportive services, they will not be tracked or documented for compliance.

- d. Exceptions to the MWA's Limits, Conditions and Guidelines on Supportive Services – On a case by case basis, the service provider may request from the MWA a waiver of the foregoing limits, conditions, and guidelines when a variance for services, amount, or duration is necessary and justifiable. Such requests for a waiver will be written and submitted to the MWA's Director.
- e. Documentation Requirements for the Provision of Supportive Services – To document the necessity for and provision of supportive services, the service provider will adhere to the procedures delineated in this document and comply with general accounting practices. Automotive repairs, automotive insurance payments, and other supportive services that are the same as those for PATH will meet all the conditions and requirements of PATH.

As noted above, justification for the necessity and provision of supportive services will be documented in the participant's ISS, and on the MWA's WIOA Supportive Services Request and Determination (SSRD) form. The SSRD will be maintained in the participant's file.

- f. These policies and guidelines will apply to the MWA's WIOA Title I adult, youth, and dislocated worker programs.

### **Needs-Related Payments:**

- a. Needs-Related Payments (NRPs) provide WIOA Title I adult and dislocated worker participants financial assistance to enable them to participate in training.
- 1.) NRP Eligibility Requirements
- a.) Adult Eligibility Requirements – To receive NRPs, WIOA adults must:
- 1.) be unemployed;
  - 2.) not qualify for, or have ceased qualifying for, unemployment compensation; and
  - 3.) be enrolled full-time in and successfully completing a program of training services under the WIOA. The training institution in which the participant is enrolled will define the terms, "full-time" and "successfully completing".
- b.) Dislocated Worker Eligibility Requirements – To receive NRPs, WIOA dislocated workers must:
- 1.) be unemployed, and

- a.) Have ceased to qualify for Unemployment Insurance (UI) compensation or Trade Readjustment Allowance (TRA) under the Trade Adjustment Assistance (TAA) Act or North American Free Trade Agreement-Transitional Adjustment Assistance (NAFTA-TAA); and
- b.) Be enrolled full-time in and successfully completing a program of training services under the WIOA by the end of the 13<sup>th</sup> week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the 8<sup>th</sup> week after the worker is informed that a short-term layoff will exceed 6 months; or

2.) be unemployed and

- a.) Did not qualify for Unemployment Insurance (UI) compensation or Trade Readjustment Allowance (TRA) under the Trade Adjustment Assistance (TAA) Act or North American Free Trade Agreement-Transitional Adjustment Assistance (NAFTA-TAA); and
- b.) Be enrolled full-time in and successfully completing a program of training services under the WIOA by the end of the 13<sup>th</sup> week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the 8<sup>th</sup> week after the worker is informed that a short-term layoff will exceed 6 months.

2.) NRP Payment Amounts

a.) NRP Payment Amounts for Adults:

- 1.) Adults who meet the foregoing eligibility requirements identified above, and who are enrolled in training under the WIOA, will receive a weekly NRP of \$125.
- 2.) The foregoing NRP payment level was established by the Oakland County Workforce Development Board.

b.) NRP Payment Amounts for Dislocated Workers:

- 1.) For dislocated workers who 1.) meet the foregoing eligibility requirements; 2.) were eligible for unemployment compensation as a result of the qualifying dislocation; 3.) are no longer receiving benefits; and 4.) are enrolled in training under the WIOA, the weekly NRP amount they receive will either 1.) not exceed the applicable weekly level of the unemployment compensation benefits or 2.) equal \$125, whichever is less.
- 2.) For dislocated workers who 1.) meet the foregoing eligibility requirements; 2.) did not qualify for unemployment compensation as

a result of the qualifying lay-off; and 3.) are enrolled in training under the WIOA, the weekly NRP amount they receive will either be 1.) equal to the poverty level, based on his/her family size and income for an equivalent period or 2.) equal to \$125, whichever is less. The participant's family size will be determined, and the amount for this level will be divided by 52 weeks to determine the weekly amount. If, for example, the participant is a member of a family of two, his/her poverty level income would be \$14,570 per year or \$280 per week. Accordingly, his/her weekly NRP will be \$125.

3.) The weekly NRP payment level must be adjusted to reflect changes in the participant's total family income, as determined by the local Workforce Development Board's policies. Accordingly, the MWA's Workforce Development Board has determined that, as they complete the MWA's Needs Related Payments Weekly Verification of Income and Training Form, the participant and his/her case worker will carefully consider questions 9 and 10, which ask if the participant has other resources (e.g., family income) to enable him/her to participate in training. The participant's responses to these questions will determine if the participant's NRP payment level should be adjusted to reflect changes in his/her total family income. The analysis for an adjustment will be described and documented in the participant's Individual Service Strategy (ISS).

### 3.) NRP Durations

- a.) The maximum duration participants can receive NRPs is 26 weeks, or for the duration of the approved training, whichever is less.
- b.) NRP payments will be issued at two week intervals.
- c.) When and if a participant's training has a break of ten (10) or fewer business days, excluding weekends and holidays, the participant is still eligible for NRPs and will still receive the weekly NRP. If the training break exceeds ten (10) business days, the participant will not receive NRPs for that period, and NRPs will not resume until the training resumes.
- d.) As noted above, participants must attend training full-time, and they must be 1.) successfully completing the training and 2.) maintaining an acceptable attendance record. The terms, "full-time", "successfully completing", and "an acceptable attendance record" will be defined by the training institution in which the participant is enrolled.
- e.) NRPs will not be made to a participant beyond his/her training period (i.e., the period in which he/she is enrolled in a training program and is attending the program's classes).

### 4.) NRP Policies and Procedures

- a.) Copies of the participants' Individual Training Agreements (ITAs) must be maintained in their files.

- b.) The participant and his/her case manager will jointly complete and sign the "Needs Related Payments Analysis Form", which is attached to this document, and which either qualifies or disqualifies the participant for NRPs.
- c.) As they complete the NRP Analysis Form, the participant and his/her case manager will carefully consider questions 9 and 10, which ask if the participant has "other resources" to enable him/her to participate in training. The participant's responses to these questions will determine if he/she needs NRPs to participate in training. This analysis of need will be described and documented in the participant's Individual Service Strategy (ISS).
- d.) At the beginning of each training week, the participant and his/her case manager will jointly complete and sign the "Needs Related Payments Weekly Verification of Income and Training Form", which is attached to this document, and which verifies whether the participant is a.) still eligible or ineligible for NRPs or b.) has now become eligible or ineligible for NRPs.
- e.) As the participant and his/her case manager complete the NRP Weekly Verification of Income and Training Form, the participant will, if applicable, submit to the case manager his/her Unemployment Insurance (UI) monetary determination letter (and any changes thereto). Every two weeks, the participant will also access, print, and submit to the case manager his/her UI payment information and history, which is available online through the Unemployment Insurance Agency's (UIA's) Claim Portal. To access this information, the participant must establish a user name and password. Whether a participant begins to receive or discontinues receiving NRPs, and/or to what extent a participant's NRP amounts are adjusted, will depend on the information the participant submits with and/or stipulates on the NRP Weekly Verification of Income and Training Form.
- f.) Since the MWA cannot access a participant's UI payment history (and since the MWA cannot, therefore, independently verify the UI information the participant has submitted with and/or stipulated on the NRP Analysis and NRP Weekly Verification of Income and Training Forms), the MWA will assume no liability that may occur, if it is subsequently determined that a participant falsified the UI information he/she submitted and/or stipulated.
- g.) As they complete the NRP Weekly Verification of Income and Training Form, the participant and his/her case manager will carefully consider questions 10 and 11, which ask if the participant has "other resources" to enable him/her to participate in training. The participant's responses to these questions will determine if he/she needs NRPs to participate in training. This analysis of need will be described and documented in the participant's ISS.
- h.) The participant's case manager will review the MWA's NRP policies with him/her, and both the participant and the case manager will sign a document that stipulates that the participant has read and understands the NRP policies.

- i.) The MWA's service providers will maintain the following NRP-related information in the participant's file:
  - a copy of his/her course outline and schedule;
  - a copy of his/her ITA (if applicable);
  - a copy of his/her Needs Related Payments (NRP) Analysis Form;
  - copies of his/her NRP Weekly Verification of Income and Training Forms;
  - copies of his/her UI monetary determination letter and bi-weekly UI payment information and history updates (if applicable);
  - copies of his/her bi-weekly training attendance sheets and progress reports (e.g., grades), as confirmed and signed by the training instructor;
  - copies of his/her registration for his/her training at the training institution; and
  - his/her ISS and revisions to the ISS, which will contain, or to which will be attached, the foregoing information.
- j.) The MWA's service provider will verify a participant's training participation before NRPs are authorized and made. To verify participation, the service provider will obtain and review weekly attendance sheets that the training institution's representative has signed.
- k.) All cases of fraud or suspected fraud that relate to NRPs will be forwarded to the appropriate legal authorities for prosecution.
- l.) In the event of fraudulent activity, all payments to the fraudulent party will cease, and all funds that have been paid will be recovered.

**12. A Description of How the Local Board will Coordinate WIOA Title I Workforce Investment Activities with the Provision of Transportation and Other Supportive Services in the Local Area:**

Section B.11 of this Plan Modification states that the Oakland County MWA will provide supportive services for adults, dislocated workers, and youth who are participating in WIOA Title I workforce investment activities, and who are unable to obtain such supportive services through the programs of other organizations, including the WIOA One-Stop partners. Section B.11 includes the MWA's supportive services policy, which identifies specific procedures that case managers must follow as they refer WIOA participants for services. Case managers must, for example, provide participants supportive services information, which must include the name, address, and telephone number of the partner agency; the supportive service it provides; and its eligibility requirements.

The MOUs that the Workforce Development Board and these partners have executed will facilitate the MWA's referrals for supportive services. At their discretion, case managers may also help participants make supportive service appointments with partner agencies. By following these referral procedures, the MWA's case managers will ensure that the MWA's WIOA Title I workforce investment activities are effectively coordinated and aligned with other appropriate supportive services in Oakland County.

**THE OAKLAND COUNTY MICHIGAN WORKS! AGENCY'S  
NEEDS RELATED PAYMENTS  
WEEKLY VERIFICATION OF INCOME & TRAINING FORM**

**Participant Information**

1. Name:	_____	_____	_____
	Last	First	M.I.
2. Home Address:	_____		
	Street Address (Include Apartment Number)		
	_____	_____	_____
	City	State	Zip Code
3. Phone Numbers(s):	( ) - _____	( ) - _____	
	Home	Mobile	

**Needs Related Payment Information**

4. Needs-Related Payment Amount: \$ _____ /week	5. Training Week Beginning/Ending / / to / /
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**Individual Assessment Questions:**

6. Did you claim, or intend to claim any type of unemployment benefits for the training week?	<input type="checkbox"/> Yes \$ _____	<input type="checkbox"/> No
7. Did you receive any payments for full-time work, part-time work, work experience, or work study for the training week?	<input type="checkbox"/> Yes \$ _____	<input type="checkbox"/> No
8. Did you receive TAA or Trade Readjustment Allowance payments for the training week?	<input type="checkbox"/> Yes \$ _____	<input type="checkbox"/> No
9. Were you enrolled in or receiving paid job training for the training week?	<input type="checkbox"/> Yes \$ _____	<input type="checkbox"/> No
10. Have you considered all "other resources" available that will help you successfully participate in your full-time training program? Examples of other resources include, but are not limited to: Pell Grants, severance pay, other family income (spouse's income).	<input type="checkbox"/> Yes	<input type="checkbox"/> No
11. Will "other resources" meet your need to support you while attending school full-time?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
12. Did you maintain full-time hours as defined by the training institution?	<input type="checkbox"/> Yes	<input type="checkbox"/> No, explain:
13. Did you maintain satisfactory progress as defined by the training institution?	<input type="checkbox"/> Yes	<input type="checkbox"/> No, explain:
14. Additional Comments:		

15. All of the answers and information are true and complete to the best of my knowledge. I have read, understand, and agree to comply with the policies for Needs Related Payments.

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

Participant Signature

<b>16. To Be Completed By the Case Manager</b>
I have reviewed these policies with the participant, have determined his/her eligibility to receive Needs Related Payments, and have explained the procedures for collecting Needs Related Payments.
_____
Case Manager Signature
_____
Date

**THE OAKLAND COUNTY MICHIGAN WORKS! AGENCY'S  
NEEDS RELATED PAYMENTS  
ANALYSIS FORM**

**Participant Information**

1. Name:	_____	_____	_____
	Last	First	M.I.
2. Home Address:	_____		
	Street Address (Include Apartment Number)		
	_____	_____	_____
	City	State	Zip Code
3. Phone Numbers(s):	(____) _____	-	(____) _____
	Home		Mobile

**Needs Analysis**

**Please note that a "No" answer to Question A would disqualify you for NRPs.**

4. Question A	Are you unemployed or have you received notification of layoff?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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**Please note that a "Yes" answer to Question B would disqualify you for NRPs.**

5. Question B	Do you qualify for Unemployment Insurance (UI) benefits, additional State UI benefits (Training Benefits) or Trade Readjustment Allowance (TRA) benefits?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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**Please note that a "No" answer to Question C would disqualify you for NRPs.**

6. Question C	Have you ceased to qualify for Unemployment Insurance (UI) benefits, additional State UI benefits (Training Benefits) or Trade Readjustment Allowance (TRA) benefits?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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7. Additional Comments:
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8. Based upon the responses to questions A-C, is the participant eligible to receive NRPs?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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9. Have you considered all "other resources" available that will help you successfully participate in your full-time training program? Examples of other resources include, but are not limited to: Pell grants, severance pay, other family income (spouse's income).	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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10. Will "other resources" meet your need to support you while attending school full-time?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--	------------------------------	-----------------------------

11. All of the answers and information are true and complete to the best of my knowledge. I have read, understand, and agree to comply with the policies for Needs Related Payments.

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

Participant Signature

<b>16. To Be Completed By the Case Manager</b>	
I have reviewed these policies with the participant, have determined his/her eligibility to receive Needs Related Payments, and have explained the procedures for collecting Needs Related Payments.	
_____/_____/_____	
Case Manager Signature	Date

**13. A Description of the Local per Participant Funding Cap, if Applicable:**

The Oakland County Workforce Development Board has not yet established a per participant funding cap. The Board, however, reserves the right to establish such a cap, through a another modification to this Plan.

**14. A Description of the MWA's Plans, Assurances, and Strategies for maximizing coordination, improving service delivery, and avoiding duplication of Wagner-Peyser and other services through the one-stop system:**

- The organizations that operate the MWA's Michigan Works! (WIOA One-Stop) Service Centers also operate the WIOA Title I adult, dislocated worker, and youth programs; the WIOA Title III Wagner-Peyser Employment Service; the Temporary Assistance for Needy Families (TANF) Act's Partnership. Accountability. Training. Hope. initiative; and the Trade Adjustment Assistance (TAA) Act Program. Thus, coordination among these programs is easily and effectively achieved, and the duplication of services among these programs is reduced to a minimum. In some cases, for example, staff members at the service centers are assigned to more than one program, and they are frequently cross-trained to provide customers the services of all programs. Moreover, the centers' directors can quickly and easily deploy staff from one program to another program, if customer volume and/or new initiatives so warrant. Strategies for improving the centers and the services they provide are described in Section B.6 of this Plan Modification.
- The services the MWA's WIOA one-stop core and other partners provide (and strategies for integrating, coordinating, aligning, and improving these services with the MWA's service centers) are identified and described in the MOUs that the Workforce Development Board and the County Executive negotiated and executed with these partners. The MOUs, for example, identify procedures for referring customers to and from the MWA's and its partners' programs.

**15. A Description of the Local Area's Delivery of Employment Services under the Wagner-Peyser Act of 1933, as Amended by Title III of the WIOA:**

- a. **Point of Contact:** The Oakland County MWA's point of contact for Employment Services (ES) is the manager of the Oakland County Workforce Development Division, Jennifer Llewellyn, whose address, telephone number, and electronic e-mail address follow:

2100 Pontiac Lake Road, Department #437  
 Waterford, Michigan 48328  
 (248) 452-2256  
 llewellynj@oakgov.com

- b. **Merit-Based Service Providers:** The Oakland County MWA's merit-based ES providers follow:

1	2	3	4	5
MWA PROVIDED	CONTRACTED SERVICE PROVIDER	NAME OF ENTITY	TYPE OF ENTITY	MERIT BASED ENTITY
	X	Oak Park School District	School District	X
	X	City of Southfield	Local Unit of Government	X
	X	Troy School District	School District	X
	X	Waterford School District	School District	X

c. **Wagner-Peyser Funded Services:** Employment Services will be provided at no cost to employers and job seekers. These services will be provided only at the Oakland County MWA's Michigan Works! Service Centers, which operate all of the MWA's workforce development programs. Each of these centers is accessible to persons with disabilities, and each will provide all required services.

d. **Labor Exchange Services:**

The Oakland County MWA's ES providers will provide employers and job seekers Labor Exchange Services by using the following three tiers of services:

1.) Employers:

- a.) Self-Services – A self-service is any service that is provided to employers through an electronic resource, or at a physical location where little or no staff involvement occurs.
- b.) Facilitated Services – A facilitated service assists the employer in using any self-service tool. These services may include assistance with navigating the Pure Michigan Talent Connect (PMTTC) and Internet sites and distributing and collecting job applications.
- c.) Staff-Assisted Services – A staff-assisted service is a service that requires a significant amount of staff time. These services may include inputting job orders on the PMTTC for employers; completing a search for resumes that match employer job order criteria; contacting job seekers for initial screenings before the employer interviews them; and scheduling interviews for the employer.

2.) Job Seekers:

- a.) Self-Services – A self-service is any service that is provided to the job seeker through an electronic resource, or at a physical location where little or no staff involvement occurs.
- b.) Facilitated Services – Facilitated services assist the job seeker in using any self-service tools. These services may include assistance with navigating the Pure Michigan Talent Connect (PMTTC) and Internet sites; inputting information on the PMTTC; printing and making copies of resumes; and explaining different types of the job search criterion.
- c.) Staff-Assisted Services – A staff-assisted service requires a significant amount of staff time and can be reported under one of the Wagner-Peyser (WP) service categories in the Michigan One-Stop Management Information System (OSMIS). These services may include General Services/Assistance (e.g., assistance in establishing eligibility for financial aid, initial assessment of an individual's skill levels and supportive services needs, and information and meaningful assistance on filing for Unemployment Insurance (UI); job training preparation (e.g., career counseling and guidance and job search assistance); and placement assistance, including employment referrals.

The foregoing employer and job seeker services are identified and described in Chapters 3 (“Employer Services”) and 4 (“Job Seeker Services”) of the TIA/WDA’s Employment Service (ES) Manual.

At least one staff-assisted service will be available in all of the MWA’s ES centers. All services will be offered on a group or individual basis, and on a reasonable schedule.

**e. Career Services:**

The Oakland County MWA’s ES providers will provide employers and job seekers career services that are appropriate under the Wagner-Peyser Act, as amended under Title III of the WIOA. These include basic career services (e.g., initial skill assessments, labor exchange services, employee recruitment and screening, information on programs and services, and program referrals) and some individualized career services (e.g., career counseling). ES customers who require other individualized career services (e.g., internships and work experience) and training services (e.g., occupational skill training) will be referred to the appropriate WIOA programs. Because the MWA’s ES providers also operate these WIOA programs, such referrals will be easily facilitated.

**f. Staff Availability:**

The following numbers of staff members at the following ES centers will provide facilitated access and staff-assisted services:

<u>ES Center</u>	<u>Staff</u>
Pontiac Michigan Works! Service Center*	3 full-time
North Oakland Michigan Works! Service Center-Highland*	2 full-time
North Oakland Michigan Works! Service Center-Novi*	2 full-time
Oak Park Michigan Works! Service Center	3 full-time
Southfield Michigan Works! Service Center	2 full-time 1 part-time
Troy Michigan Works! Service Center	3 full-time
Waterford Michigan Works! Service Center	1 full-time 3 part-time

\*Employment Services at the Pontiac Center and the North Oakland Highland and North Oakland Novi Centers are provided by merit-based staff members who are employees of the Troy Michigan Works! Service Center.

Staffing levels will vary, depending on ES customer levels. When customer levels are low, for example, fewer staff members will be available to provide facilitated access and mediated services. When customer levels are abundant, however, staff members who are assigned to other workforce development programs will provide facilitated access and staff-assisted services. These staff members will be cross-trained to provide such services.

**g. Unemployment Insurance (UI) Work Test:**

A description of how the Unemployment Insurance (UI) Work Test will be administered to UI claimants follows:

**1.) ES Registration of UI Claimants:**

- a.) To register for work, the UI claimant must, at a minimum, enter a profile on the PMTC. The MWA's ES centers will also encourage claimants to post their resumes on the PMTC. Profiles can be entered at the ES centers or from any Internet connection that is available to the claimants.
- b.) The Unemployment Insurance Agency (UIA) advises UI claimants to complete a profile, and to report, in-person, to an ES center within five (5) business days of filing their claim. The claimant must bring his/her "Notice to Register for Work" form (Form UI-1222) to this in-person visit.
- c.) The ES center staff person will a.) verify that the claimant's profile is in the PMTC and b.) enter the claimant's Social Security Number (SSN) and registration date on the OSMIS.
- d.) The ES center staff person will date-stamp the claimant's UI-1222 form, return it to the claimant, and tell him/her to retain the form as proof that he/she registered for ES.

**2.) Work Test and Eligibility Assessment:**

- a.) The work test 1.) helps to assure that UI claimants are exposed to job opportunities and 2.) demonstrates that claimants comply with these basic requirements for receiving UI benefits: claimants must be able and available to work; they must be seeking work; and they cannot refuse offers of any suitable work.
- b.) The MWA's ES centers will be responsible for reporting to the UIA any incident of a claimant's non-compliance. Non-compliance includes:
  - not being able to work;
  - not being available to work;
  - not seeking work; or
  - refusing offers of suitable work.
- c.) If it comes to the attention of the ES center that a UI claimant is in violation of work test requirements, the center must report the non-compliance to the UIA through the Michigan Integrated Data Automated System (MiDAS).
- d.) All UI claimants must conduct a systematic and sustained work search for each week they claim unemployment benefits. These claimants must report their record of work search at least once a month, by using one of the following methods:

- they can submit information on the UIA's Claim Portal, under "UIA Online Services for Unemployed Workers;" or
- they can submit Form UIA 1583, "Monthly Record of Work Search", via mail or fax; or
- they can appear at one of the MWA ES centers to file the foregoing work search form.

The claimant's search record must include 1.) the name and physical or online location of no less than two (2) employers at which he/she searched for employment during each claimed week; 2.) the date; and 3.) the method he/she used to search for employment (online, in-person, etc.). His/her work search record must be submitted online, via mail or fax, or in person, no later than the end of the last week or a month during which he/she claimed benefits.

Claimants can obtain Form UIA 1583, "Monthly Record of Work Search", on the UIA's website, [www.michigan.gov/uia](http://www.michigan.gov/uia). Claimants can also obtain the form at a UIA Problem Resolution Office or at one of the MWA's ES centers.

- e.) The UIA is solely responsible for advising UI claimants about their UI benefits eligibility. The ES centers will not attempt to explain work test requirements to claimants. The centers will advise claimants to address all inquiries about the work test and eligibility requirements to the UIA. These inquiries can be addressed by calling 866-500-0017, through the claimant's Web Account Manager (MiWAM) account; by utilizing the UI Hotline phone that is located in the ES center; or by visiting a Problem Resolution Office (PRO).

(As the MWA's ES centers administer the UI Work Test, they will comply with Section 4:3 ("Services for Unemployment Claimants") of Chapter 4 of the TIA/WDA's ES Manual.)

**h. Reemployment Services and Eligibility Assessment (RESEA):**

The MWA's RESEA requirements will be administered by adhering to the following procedures:

- 1.) The Michigan Unemployment Insurance Agency (UIA) will send a letter (UIA 6360) to each claimant whose name appears on a weekly list of RESEA participants. The letter will inform the claimant to contact one of the MWA's Michigan Works! Service Center locations, so he/she can schedule his/her RESEA appointment.
- 2.) Each week, the UIA will generate a list of claimants who will be accessible in the TIA/WDA's OSMIS. The record will include the claimant's name, address, date of birth, and e-mail address. This e-mail address will permit the MWA to contact the claimant and explain to him/her the letter he/she has received from the UIA. (If an e-mail address is not provided, the MWA can send a letter to the claimant.) This initial contact from the MWA will permit the MWA to provide a personalized invitation and an introduction to the RESEA program. Attachment A to TIA/WDA Policy Issuance (PI): #17-18 provides examples of an e-mail and a letter that the MWA can use to contact the claimant.

- 3.) A claimant has until the date that is listed in his/her letter (UIA 6360) to contact the MWA's service center and schedule his/her RESEA appointment. The service center, however, will schedule the RESEA appointment with the claimant within 21 days of the "Letter Sent Date".
- 4.) A claimant is allowed to reschedule his/her first RESEA appointment only once, within 21 days from the "Letter Sent Date". This rescheduling may occur, if the claimant calls the service center before his/her scheduled appointment. The rescheduled appointment must still occur within 21 days of the claimant's "Letter Sent Date". A claimant cannot be excused from participating in any RESEA activity or service.
- 5.) The Oakland County MWA's service centers will schedule a RESEA appointment for -- and provide RESEA services to -- only those RESEA UI claimants whom the UIA has referred to the Oakland County MWA. The Oakland County MWA's service centers will neither schedule a RESEA appointment for -- nor serve -- RESEA UI claimants whom the UIA has referred to another MWA. If a RESEA UI claimant whom the UIA has referred to another MWA contacts an Oakland County service center, that center will advise the RESEA UI claimant to contact an office that is identified in the claimant's UIA 6360 letter.
- 6.) If the claimant does not contact the center, or if the claimant contacts the center after the date that is listed in his/her UIA 6360 letter, the OSMIS will not create a RESEA activity, and will automatically send the claimant's information back to the UIA with a result code of "No Contact". The weekly claimants' report will reflect the "No Contact" in the record status column. This action will occur 24 calendar days after the "Letter Sent Date". No Center action is needed.
- 7.) When a UI claimant contacts the MWA's service center to schedule his/her RESEA appointment, the center staff person must determine the status of the claimant's OSMIS registration. The center must choose which of the following circumstances apply to the claimant and take the action indicated:

**a.) The claimant has an active Wagner-Peyser (WP) registration.**

The center will match the claimant to an active WP registration by creating a "RESEA" activity. After the RESEA activity has been created, the OSMIS will change the claimant's status from "Pending Resolution" to "Resolved" on the RESEA Weekly File report. The service center staff person may then schedule the claimant's RESEA appointment in the OSMIS.

**b.) The claimant has an existing WP registration, but it has been "Exited".**

The center will manually update the WP registration for the claimant. After the WP registration is updated, the center can access the "RESEA Weekly File" to find that claimant and schedule his/her RESEA appointment. This action changes the claimant's status on the "RESEA Weekly File" from "Pending Resolution" to "Resolved".

**c.) The claimant has no existing WP registration.**

In this rare case, the center will create a new registration over the telephone. Once the claimant's WP registration is active, the center can access the "RESEA Weekly File" to find the claimant's name, and then continue to match the claimant to the active WP registration. This action changes the claimant's status on the "RESEA Weekly File" from "Pending Resolution" to "Resolved".

- 8.) After the claimant's OSMIS registration is verified, the center must complete the claimant's RESEA scheduling/appointment information (i.e., date, time, MWA location). The appointment must be scheduled by the date that is listed in the claimant's letter (UIA 6360), and the appointment must be held within 21 calendar days of the "Letter Sent Date".
- 9.) If the claimant needs to reschedule his/her appointment, the service center will enter the claimant's new, rescheduled date in the OSMIS. This rescheduled date still must occur within 21 days of the "Letter Sent Date". To enter the new, rescheduled date, the service center will a.) find the claimant's name under the "Schedule Participant Report" in the OSMIS and b.) select the "Scheduling" tab. The "Rescheduling Section" is in green, just below the "Scheduling Section". Each field in this section is mandatory and must be completed.
- 10.) A second RESEA appointment may be scheduled if the service center and the claimant agree that the claimant will benefit from this additional service.
- 11.) The service center must schedule the claimant's second RESEA appointment on the same day the claimant successfully completed his/her first RESEA appointment, and the second RESEA appointment must occur within five (5) to ten (10) calendar days from the first RESEA appointment.
- 12.) The service center must enter the claimant's second RESEA appointment in the OSMIS, by showing the date and time of the appointment.
- 13.) If necessary, the claimant may reschedule his/her second RESEA appointment, but only once. The rescheduled second RESEA appointment must be made and completed within five calendar days of the date of the originally scheduled second RESEA appointment. The service center will enter the rescheduled appointment in the tab that is labeled "Scheduling".
- 14.) If the claimant does not appear at his/her second RESEA appointment, the service center will note an eligibility issue in the OSMIS.
- 15.) For data entry errors, the service center will contact Ms. Barbara Emmons, Senior Departmental Analyst, by e-mail at [emmonsb@michigan.gov](mailto:emmonsb@michigan.gov), or by telephone at (517) 241-2923.
- 16.) The OSMIS eligibility section consists of the RESEA activities that are described below. Each activity offers a "Yes/No" indicator, which enables and allows the service center to document whether the claimant has completed each activity.
- 17.) The OSMIS outcome section enables and allows the service center to document the overall completion status of the activity. A "Yes" in each of the component fields must appear for this status to occur. The three available values follow:

- completed all requirements; or
- attended but failed to complete; or
- no show.

A date of completion is also required in this section.

18.) The Reemployment Service outcome section enables and allows the service center to document the reemployment services. The three fields available in the Reemployment Services section follow:

- the scheduled date of the reemployment service;
- the outcome of the service (i.e., completed all requirements; attended, but failed to complete; or no show); and
- the outcome date of the reemployment service.

The service center will document reemployment services in the WP section of the OSMIS.

19.) The service center must enter in the OSMIS all reporting, minus the outcome of the reemployment service, within 48 hours of the service or outcome. When the reemployment service is completed (or when the center receives an indication that a claimant is unable to work or that he/she is unavailable for work or that he/she has refused any job offers of suitable work), the center will report this information in the OSMIS.

20.) During the claimant's first RESEA appointment, the following activities must occur:

- a.) Orientation to MWA Services – The Oakland County MWA's service centers will provide RESEA UI claimants an orientation to the RESEA Program and the MWA's services. This orientation will include, but may not be limited to, a description of the RESEA Program's goals and services; an overview of the center's Wagner-Peyser Employment Services; and an overview of services that are available through the Workforce Innovation and Opportunity Act (WIOA).
- b.) UI Eligibility Assessment – To evaluate his/her continued UI benefits eligibility, the MWA's service centers will ask the UI claimant a set of questions. "Attachment B" to TIA/WDA Policy Issuance (PI): #17-18 is a guide that will assist service center staff members as they conduct the eligibility review. If the claimant answers "no" to any of questions one (1) through three (3) and/or "yes" to any of questions four (4) through six (6), a possible eligibility issue is indicated. The service center must immediately report that issue to the UIA, by making an entry in the OSMIS. The service centers will not make any determinations; the UIA is responsible for making determinations. Only Wagner-Peyser merit-based staff members can deliver UI eligibility assessment, and the assessment must be completed in a one-on-one setting.
- c.) Confirmation of an Active Profile on the PMTC – The MWA's service centers must confirm that the RESEA UI claimant has posted an active profile on Pure Michigan Talent Connect (PMTTC).

- d.) Verification of the Monthly Work Search (Form #1583) – The MWA’s service centers must verify that the claimant has correctly completed Form #1583. RESEA UI Letter #6360 states the claimant must bring to his/her RESEA appointment a copy of this form, which the center will review. The on-line submission of Form #1583, however, is also acceptable for the center’s review.
- e.) Development of an ISS – The MWA’s service centers will help the RESEA UI claimant develop his/her Individual Service Strategy (ISS), which must be completed in a one-on-one setting.
- f.) Review and Discuss Specific Labor Market Information (LMI) – The MWA’s service centers will review and discuss with the RESEA UI claimants specific labor market information (LMI), which may include, but which will not be limited to, LMI from the Michigan Department of Technology, Management, and Budget’s Bureau of Labor Market Information and Strategic Initiatives; Oakland County Economic Outlook Reports; Oakland County Skills Needs Assessment Reports; and LMI from the Workforce Intelligence Network.
- g.) Provision of at least Two Hours of Appropriate Reemployment Services – The MWA’s service centers must provide RESEA UI claimants two hours of appropriate reemployment services, which will be in addition to the foregoing RESEA services (i.e., orientation, confirmation of an active profile on the PMTC, UI eligibility assessment, verification of the Monthly Work Search (Form #1583), ISS development, and LMI). Reemployment services the centers will provide may include, but may not be limited to, the following: resume writing assistance, job search workshops and planning, job development, assessment and testing services, career guidance, and other job search assistance activities.

These reemployment services may be provided on the same day -- or within 30 calendar days -- of the UI claimant’s RESEA appointment.

- 21.) If the claimant schedules and keeps a second RESEA appointment, all of the foregoing RESEA activities are required, except for the “Orientation to the MWA’s Services”. The required RESEA activities will be enhanced (i.e., augmented) during the second RESEA appointment.
- 22.) For USDOL reporting purposes, the MWA will submit to the TIA/WDA one RESEA success story each quarter. The MWA will submit these success stories to Teresa Keyton at keytont@michigan.gov.

**i. Participation in a System of Clearing Labor Between the States:**

The MWA and its ES centers will participate in the National Labor Exchange System’s component for clearing labor between the states, by accepting and processing interstate and intrastate job orders. The MWA’s process for participating in this system follows:

- 1.) When out-of-state employers request recruitment assistance for an out-of-state job opening, ES center staff will initiate the clearance process. This process refers to out-of-state employers who work through their state’s public employment service agency to recruit workers from Michigan for jobs in the employer’s state.

- 2.) Out-of-state employers who have an existing business location in Michigan, or who are relocating, or who are opening a new business in Michigan, may register online to use the PMTC.
- 3.) Out-of-state employers who are recruiting Michigan workers for a job in another state may not register to use the PMTC unless the job is in a contiguous labor market area. Contiguous labor market areas include Michigan counties that border Indiana, Ohio, Wisconsin (within 100 miles of the Michigan border), and Ontario, Canada. These out-of-state employers post their jobs by using the nearest city in Michigan as the job location; however, the first line of the job description must state the actual out-of-state work location.
- 4.) Out-of-state employers whose positions are home-based, trucking, and information technology are allowed to register on the PMTC.

(As the MWA's ES centers participate in a system for clearing labor between the states, the centers will comply with Section 3:2 ("Out of State Job Orders: Non-Agricultural") of Chapter 3 of the TIA/WDA's ES Manual.)

**j. Services to Veterans:**

The Oakland County MWA's process for referring veterans to Veterans Career Advisors (VCAs) appears below. This process also explains how the MWA will ensure that veterans will be provided the same employment services that the general population receives. The MWA's ES center staff will formally refer veterans or eligible spouses to a VCA as the centers continue to provide them the appropriate services and programs, in accordance with the MWA's Priority of Service Policy.

- 1.) As part of implementing Priority of Service for Veterans and Eligible Spouses, the MWA's ES centers will be required to identify veterans and eligible spouses at each point of entry in the workforce development system, by, at a minimum, encouraging them to self-identify. Self-attestation is sufficient for identification as a veteran or eligible spouse. ES center staff may also ask customers if they are a veteran or an eligible spouse.
- 2.) All customers who self-identify as veterans or eligible spouses will be notified immediately that they may be qualified to receive additional services from a VCA. The MWA's ES centers will make this notification, which must include all of the following information:
  - as a veteran or eligible spouse, the customer is entitled to receive Priority of Service;
  - as a veteran or eligible spouse, the customer may be eligible to receive additional personalized employment services from a VCA; and
  - VCA services are in addition to other One-Stop services.

As part of the notification process, the ES center will ask customers who self-identify as veterans or eligible spouses to read and sign the MWA's "Informed Consent Form".

- 3.) If a veteran or eligible spouse customer is not interested in pursuing VCA services, the MWA's ES center will continue to provide the customer all other appropriate services and programs that would be provided any other customer.

These programs and services will be provided to the veteran or eligible spouse customer in accordance with the MWA's Priority of Service procedures.

- 4.) If a veteran or eligible spouse customer is interested in pursuing VCA services, the MWA's ES centers must immediately provide that customer a copy of the appropriate version of the Military Service Questionnaire (i.e., the "Military Service Questionnaire for Veterans of the U.S. Military", the "Military Service Questionnaire for Current Active Duty U.S. Service Members", and the "Military Questionnaire for a Spouse or Family of a U.S. Veteran or Service Member"). The Questionnaire will be completed immediately by the customer, who will promptly return it to the ES center's staff.
- 5.) When he/she provides the customer a Military Service Questionnaire and its instructions, the ES center's staff person will notify the customer of the following points:
  - the information is being requested from him/her on a voluntary basis;
  - completing the form is a requirement for VCA staff services;
  - the information he/she provides on the form will be kept confidential;
  - his/her refusal to provide the information will not subject the customer to any adverse treatment, but he/she may not be eligible for VCA services;
  - the information he/she provides on the form will be used only in accordance with the law;
  - when he/she has completed the Military Service Questionnaire, the customer should return it to the same ES center staff person who gave the customer the questionnaire and its instructions.
- 6.) After the customer returns the completed Military Service Questionnaire to the ES center's staff person, the ES center will review it immediately to determine if the customer is qualified to receive VCA services.
- 7.) The ES center will make the foregoing determination by reviewing the instructions provided on the Military Service Questionnaire.
- 8.) After the MWA's ES service center has made the foregoing determination, the ES center's staff member who has reviewed the customer's Military Service Questionnaire will complete the "For Staff Use Only" section of the customer's Questionnaire. The staff member will:
  - enter "Reviewing Staff Member" data;
  - enter "Customer OSMIS ID" data; and
  - enter "Referred to:" the name of the VCA to whom the customer is being referred.
- 9.) All customers who are referred to a VCA must have an active Wagner-Peyser registration in the OSMIS. If a registration must be completed, the ES center's staff member must perform this task, because VCAs are statutorily prohibited from doing so.
- 10.) If a referral is made to a VCA, the MWA's ES center will enter the service, "Referral to Veterans Career Advisor", in the OSMIS, in addition to any other services the ES center has provided. The referral date must be the same date the Military Service Questionnaire was completed.

- 11.) The ES center's staff member will notify the VCA of the referral and provide him/her the appropriate version of the customer's Military Service Questionnaire. The method of referral will be accomplished in any manner to which the MWA and the TIA's Veterans Employment Services (VES) Manager agree. The referral, however, must adhere to the following three requirements:
  - it must be prompt (i.e., no later than two (2) business days);
  - it must be reliable; and
  - it must satisfy the requirements of a qualifying veteran.
- 12.) The VCA will keep the customer's Military Service Questionnaire on file for a period of three (3) years, and in accordance with all applicable privacy policies and laws.
- 13.) The MWA's ES centers will retain, for a period of three (3) years, copies of all completed Military Service Questionnaires that are forwarded to the VCA as part of the referral process.
- 14.) For customers whom the MWA's ES centers have determined to be unqualified to receive VCA services, the MWA's ES centers will immediately:
  - inform the customers that they do not qualify to receive VCA services;
  - continue to provide the customer all other appropriate services and programs that are provided to any other customer, in accordance with the requirements of the MWA's Priority of Service procedures; and
  - keep non-qualifying customers' Military Service Questionnaires on file for a period of three (3) years, in accordance with all applicable privacy policies and laws. Either a physical or electronic copy will be maintained.

As they provide services to veterans, the MWA's ES Centers will comply with Section 4:4 ("Services for Veterans") of the TIA/WDA's ES Manual.

The following section of this Plan Modification explains how priority of services for veterans and eligible spouses will be applied in the delivery of Wagner-Peyser-funded employment services:

The MWA ensures that its ES providers will comply with the Jobs for Veterans Act Public Law 107-288 of 2002, Title 38 of the U.S. Code, which states that veterans and eligible spouses must be given priority of service over non-veterans for the receipt of employment, training, and placement services provided under any covered program, as long as the individual otherwise meets the requirements for participation in the program. The term "qualified job training program" means any workforce preparation, development, or delivery program or service that is directly funded, in whole or in part, by the USDOL. As stated in Training and Employment Guidance Letter (TEGL) #5-03, twenty DOL-funded workforce programs are impacted by Section 4215 of the Public Law 107-288, including the following:

- the Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker Programs;
- the Wagner-Peyser Employment Service;

- Trade Adjustment Assistance (TAA) Act programs;
- National Dislocated Worker Grants;
- the Senior Community Service Employment Program;
- the Migrant and Seasonal Farm Worker Program;
- the Indian and Native American Program;
- H-1B Technical Skills Training Grants;
- the Job Corps;
- WIOA Demonstration Projects;
- Youth Opportunity Grants;
- the WIOA Youth Program;
- LMI Formula Grants;
- Pilots;
- Research and Development;
- Career One-Stop Electronic Tools; and
- Other Internet-Based Self-Service Tools.

While the exact manner in which the veterans' and eligible spouses' priority is applied will vary depending upon the services offered, the law requires that the individual who receives priority must first meet the program's existing eligibility requirements. For all programs, veterans and eligible spouses must meet the program eligibility requirements in order to obtain priority of service.

For programs with existing targeting provisions, the MWA's ES providers will apply veterans' and eligible spouses' priority by assessing a person's status in light of both the veterans' and eligible spouses' priority and the existing provisions.

The providers will also distinguish between targeting provisions that are statutory and mandatory and those that are regulatory and/or optional. Veterans' and eligible spouses' priority is a statutory mandate, but one that is not intended to displace the core function of the program. For example, certain targeting provisions are derived from a statutory mandate that requires a priority or preference for a particular group of participants or requires spending a certain portion of program funds on a particular group of participants. These are mandatory priorities. For these programs, the MWA's ES providers will apply veterans' and eligible spouses' priority as follows:

- An individual who meets both the veterans'/eligible spouses' and the mandatory priorities or spending requirement or limitation would obtain the highest preference for the program.
- Non-veterans within the program's mandatory priority would receive a preference over eligible veterans and eligible spouses outside the program-specific mandatory priority or spending requirement or limitation.
- Eligible veterans and eligible spouses outside the program-specific mandatory priority or spending requirement or limitation would receive priority over non-veterans outside the priority or spending requirement or limitation once the spending requirement or limitation is met.

Other targeting provisions may require the program to focus on a particular group of participants, or to make efforts to provide a certain level of service to such a group, but do not specifically mandate that the favored group be served before other eligible

individuals. These are discretionary or optional priorities. In the case of all such discretionary priorities, veterans' and eligible spouses' priority takes precedence over them. Veterans' and eligible spouses' priority must be implemented in advance of the opportunities and services provided to the population group covered by the optional priority.

In accordance with the requirements of 20 CFR, Part 1010, as published in the Federal Register 78132 on December 19, 2008, and in the USDOL's TEGL #10-09 ("Implementing Priority of Services for Veterans and Eligible Spouses in all Qualified Job Training Programs funded in whole or part by the USDOL"), the MWA's service providers will give veterans and their spouses the highest priority within the foregoing priority groups, followed by the non-veteran members of these priority groups. Among other strategies, the MWA's service providers and the State's VCAs will collaborate to ensure that veterans and their spouses are given the highest priority. The MWA's service providers will also implement and comply with the MWA's "Priority of Services for Veterans and Eligible Spouses Policy".

In the case of the Reemployment Services and Eligibility Assessment (RESEA) Program, the MWA's ES providers will apply veterans' and eligible spouses' priority of service as follows: Claimants with the highest probabilities of exhaustion, including veterans and eligible spouses, will still be referred to services first. This means that non-veterans with a higher probability of exhaustion will be referred ahead of veterans and eligible spouses with a lower probability of exhaustion. However, in cases where the statistical model produces identical probabilities for a number of claimants, veterans will receive priority in referral to service.

The PMTC system assures veterans' and eligible spouses' preference in the listing of employer search results through the priority listing of resumes. PMTC also suppresses posted job orders from access by the general public for 24 hours to allow the MWA's service providers and TIA/WDA staff to refer only qualified veterans and eligible spouses during this time period. Within this time frame, no non-veterans may be referred.

The MWA will ensure priority of services for all Wagner-Peyser funded employment service programs by including the foregoing provisions in its contracts with ES providers. In addition, the MWA will review these provisions with the providers, and it will require the providers to attend any training sessions that the TIA/WDA and/or the Michigan Works! Association provide.

**k. Services Provided to Migrant and Seasonal Farm Workers (MSFWs):**

In accordance with 20 Code of Federal Regulations (CFR) 653, Subpart B, MSFWs must be offered the full range of employment services, benefits, and protections, including the full range of counseling, testing, and job- and training referral services, that are provided non-MSFW customers. To ensure this, each of the MWA's ES centers will provide MSFWs services that include, but that are not limited to:

- registration for work for UI benefits;
- registration for services, as appropriate;
- employment and training referral services;
- the full range of career and supportive services;
- taking and reporting complaints and apparent violations; and
- providing MSFWs a list of available career and supportive services in their native language.

- ES center staff members will never simply give MSFWs the contact information of an agricultural employment specialist; instead, ES center staff will provide services directly to the MSFW.
- MSFW significant offices should be adequately staffed with bilingual, Spanish-speaking staff to handle the flow of mono-lingual, Spanish-speaking customers.

In addition, the MWA's ES centers must make job order information conspicuous and available to MSFWs, by all reasonable means. This job order information must, at a minimum, be:

- available through PMTC and the One-Stop service center;
- provided with adequate staff assistance for MSFWs, so they can access job order information easily and efficiently; and
- provided, in significant MSFW multilingual offices, to MSFWs in their native language.
- Finally, the MWA's ES centers must ensure that MSFWs who are English Language Learners receive, free of charge, the language assistance necessary to afford them meaningful access to the programs, services, and information that the Michigan Works! service centers offer.

Although an agricultural employment specialist has not been assigned to the MWA, the MWA's ES centers will have at least one staff member who will be available to serve MSFWs, and to whom MSFWs will be referred. Since the MWA's ES centers also operate the MWA's other workforce development programs, referrals should be easily facilitated. As the staff member provides the foregoing services, he/she will comply with provisions in Section 4:5 of the TIA/WDA's ES Manual.

#### **I. Additional Services:**

- 1.) The Oakland County MWA may fund two services, activities, or technologies that are different from -- or in addition to -- the employment services described elsewhere in this Section of the Plan. One additional service is the acquisition of labor market information on soft and technical skills that are necessary to obtain jobs at emerging and other industries the MWA has targeted (i.e., health care, advanced manufacturing, information technology and connected mobility) through the TIA/WDA's Michigan Industry Cluster Approach (MICA). Specifically, the MWA may use a portion of its ES dollars to research, develop, validate, and implement a "Skills Needs Assessment Check List" that Oakland County's current and potential employers will be asked to complete. The employers' responses will then be analyzed, so the County's workforce developers and educators can identify the skills Oakland County's job seekers need to qualify for and obtain jobs in the foregoing industry clusters.
- 2.) The MWA may also use a portion of its ES funding to purchase various Employment Service-related technologies, including "G\*STARS" and "Sales Force". G\*STARS is a web-based system that provides a standardized platform for collaborative program management and reporting across workforce development programs. It also provides a means for program management, standardized documentation, and reporting.

Sales Force is currently used by the Michigan Economic Development Corporation and Michigan's local economic development agencies, including the Oakland County Department of Economic Development and Community Affairs. It is cloud computing technology that improves customer service to employers by facilitating communication and collaboration among the MWA's business services representatives and their economic development partners.

**16. A Description of How the Local Board will Coordinate WIOA Title I Workforce Investment Activities with Adult Education and Literacy Activities Under Title II of the WIOA:**

- The Oakland County Workforce Development Board will coordinate WIOA Title I activities with WIOA Title II Adult Education and Literacy Activities by implementing the following strategies:
  - Some of the Oakland County MWA's Michigan Works! (WIOA One-Stop) Service Centers are affiliated with public K-12 school districts that also operate WIOA Adult Education and Literacy Activities. Coordination at these centers will be easily achieved.
  - All of the MWA's service centers have developed excellent working relationships with entities that operate WIOA Title II Adult Education and Literacy Activities. Staff members from the MWA's Service Center in Novi, for example, regularly visit the Novi Adult Education office to recruit students for WIOA services.
  - The director of the MWA's Oak Park Michigan Works! Service Center is a member of Prosperity Region Ten's Adult Education Coordination Committee, which meets every other month. She also regularly attends meetings of the Oakland County Community and Adult Education (OCCAE) Association.
  - A member of the MWA's administrative staff serves on the Oakland Literacy Council's Board of Directors. The Council and the MWA, which jointly hosted a workshop to acquaint students and tutors with the MWA's services, will continue to explore and implement coordination strategies, including a writing workshop.
  - The services the MWA's Adult Education and Literacy entities provide (and strategies for coordinating these services with the MWA's Michigan Works! Service Centers) are identified and described in the MOUs that the Workforce Development Board and the County Executive negotiated and executed with the providers. The MOUs, for example, identify procedures for referring customers to and from the MWA's service centers and Adult Education and Literacy entities.
  - In accordance with TIA/WDA Policy Issuance (PI): #17-24, the MWA's Career and Educational Advisory Council (CEAC) will advise the Oakland County Workforce Development Board on WIOA Title II Adult Education and Literacy Activities.
  - Section 107(d)(11)(A) of the WIOA stipulates that Workforce Development Boards "shall coordinate activities with education and training providers in the local area, including... providers of adult education and literacy activities under Title II [of the WIOA]". Sections 107(d)(11)(B)(i)(I) and (II) of the WIOA further stipulate that this

coordination shall include a.) reviewing ... [Adult Education and Literacy] applications ... to determine whether [they] are consistent with [the Board's WIOA Four-Year] Local Plan" and b.) "making recommendations [about these applications] to promote alignment with [the local] plan". Accordingly, the Oakland County Workforce Development Board reviewed and commented on proposals from organizations that proposed to provide Adult Education and Literacy Activities for the period of July 1, 2017 through June 30, 2019. The Board will conduct a similar review for the period that covers the final year of this Plan Modification.

**17. Copies of Executed Cooperative Agreements or Memorandums of Understanding (MOUs):**

The Oakland County Workforce Development Board and the County Executive have negotiated and executed with WIOA core and other program partners MOUs that define how all local service providers, including additional providers, will implement the requirements for integration of and access to the entire set of services in the MWA's Michigan Works! (WIOA One-Stop) Service Centers. Copies of these MOUs have been submitted under separate cover to the TIA/WDA, and the original documents are maintained in the MWA's administrative office, where they are available for on-site inspection.

**18. A Description of the MWA's Grant Recipient:**

Oakland County Government is a.) the Grant Recipient for funds under this Plan Modification and b.) responsible for the disbursal of grant funds. Oakland County Government is organized under the authority of Michigan Public Act 139 of 1973 (as amended by Public Act 4793 of 2000), the optional Unified Form of County Government Act.

**19. A Description of the Competitive Process the MWA will use to Award Subgrants and Contracts for WIOA Title I Activities:**

To award subgrants and contracts for WIOA Title I activities, the Oakland County Workforce Development Board and the County Executive will follow the open and competitive procurement procedures that are delineated in the MWA's written procurement policies. These procurement procedures will a.) apply to the selection of service providers and vendors that use WIOA Title I funds; b.) follow the guidelines set forth in TIA/WDA Policy Issuance (PI): #15-12 ("Procurement"); and c.) provide open and free competition.

**20. Local Levels of Performance:**

Local levels of performance that are negotiated with the Governor and the MWA's Chief Elected Official will be used to measure the performance of a.) the Oakland County MWA; b.) eligible providers under Title I, Subtitle B of the WIOA; c.) the Oakland County MWA's one-stop delivery system; and, if appropriate, the MWA's fiscal agent. As noted in Section B.1. of this Plan Modification, the Oakland County Workforce Development Board has not yet been required to provide or negotiate performance levels for WIOA "baseline measures" (e.g., "Measurable Skills Gain" and "Effectiveness in Serving Employers") that the USDOL has designated. Local levels of performance for the other performance indicators identified in Section 116 of the WIOA were negotiated for Program Years 2016 and 2017. The TIA/WDA and the MWA have not yet negotiated performance levels for Program Year 2018.

**21. A Description of the Local Board's Actions to Remain a High-Performance Board:**

- The effectiveness and continuous improvement criteria the Board will implement to assess its one-stop centers – The Oakland County Workforce Development Board will use the following criteria to assess its one-stop centers:

- WIOA Performance Indicators – The Board will use the performance indicators that are delineated in Section 116 of the WIOA to evaluate its Michigan Works! (WIOA One-Stop) Service Centers, which will be contractually obligated to achieve and/or exceed the numerical goals the MWA negotiates with the TIA/WDA. The Board will also review the Service Centers’ planned vs. actual enrollment, exit, and outcome levels. Centers that consistently fail to achieve and/or exceed these indicator goals may a.) receive technical assistance, b.) receive funding reductions; or c.) be eliminated.
- TIA/WDA Certification Criteria – The Board will contractually require its Michigan Works! (WIOA One-Stop) Service Centers to comply with the TIA/WDA’s Michigan Works! Service Center “Certification Criteria”, which are delineated in TIA/WDA Policy Issuance (PI): #15-30, Change 1. In accordance with this PI, the TIA/WDA will conduct on-site certification reviews of each center. If a center has not complied with the criteria, it will be asked to submit a corrective action plan that describes a.) how and by when the criteria will be met and b.) how the center will assure and demonstrate to the MWA that the corrective actions have been taken.
- A description of how the local board will allocate one stop center infrastructure funds – On July 14, 2015, the Oakland County Workforce Development Board designated and certified its Michigan Works! (WIOA One-Stop) Service Centers, through an open and competitive selection process that occurred earlier that year. The MWA’s Chief Elected Official (CEO) subsequently confirmed the Workforce Development Board’s decision to certify these Centers, which have been and will be allocated one-stop infrastructure funds.
- A description of the roles and contributions of the one-stop partners, including cost allocation – The MWA has negotiated and executed MOUs with the one-stop partners that are identified in Section B.2. of this Plan Modification. These MOUs describe these partners’ roles, and the Infrastructure Funding Agreements (IFAs) that are attached to the MOUs identify and delineate partner contributions and cost allocation methodologies and contributions.

**22. A Description of How Training Services that are Outlined in Section 134 (Adult and Dislocated Worker) will be Provided through the Use of Individual Training Accounts (ITAs):**

- At this time, the Oakland County MWA will use only Individual Training Accounts (ITAs) to provide occupational classroom training services. If the MWA subsequently chooses to execute occupational classroom training services contracts, a description on their use will be submitted, via an additional modification to this Plan.
- Because the MWA is not using occupational classroom training service contracts, coordination between them and ITAs is unnecessary.
- The Oakland County Workforce Development Board will ensure informed choice as customers select training programs through ITAs, by adopting the following procedures:
  - The Oakland County MWA will establish Individual ITAs to finance occupational classroom training programs for adults, dislocated workers, and, as appropriate, eligible out-of-school youth who are ages 16 through 24. Under the ITA system, adult, dislocated worker, and eligible out-of-school youth participants will purchase training services from eligible providers that the participants select in consultation with their case managers.

- Payments from ITAs may be made in a variety of ways, including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods. Payments also may be made incrementally, through payment of a portion of the costs at different points in the training course.
- The MWA may impose the following limits on the dollar amounts and/or duration of ITAs:
  - The appropriate service provider may impose limits for individual participants, based on the needs that are identified in their individual employment plans; and
  - The MWA may establish a range of amounts and/or a maximum amount that are applicable to all ITAs.
- ITAs will be provided in a manner that maximizes consumer choice. Accordingly, the MWA, through its Michigan Works! (WIOA One-Stop) Service Centers, will make available to customers the Statewide Eligible Training Provider List (i.e., Pure Michigan Training Connect). The list will include a.) a description of the programs through which the providers may offer the training services, b.) information that identifies eligible providers of apprenticeships and customized training, and c.) performance and cost information about eligible providers.
- An individual who has been determined eligible for and able to benefit from training services may select a provider from the state's list after he/she has consulted with his/her case manager. Unless it has exhausted its training funds for the program year, the service center should refer the individual to the selected provider and establish for the individual an ITA to pay for the training.

**23. A Description of the Local Board's Process to Provide a 30 Day Period for Public Comment on the WIOA Local Plan:**

The Oakland County MWA a.) published in a local newspaper and b.) posted on Oakland County's website, [advantageoakland.com](http://advantageoakland.com), a public notice that explained how, during a 30 day period, the MWA's Mid-Cycle Modification to its Four-Year WIOA Local Plan could be obtained for review, comment, and input by the public. The notice included the following information:

- that the 30 day period for review, comment, and input occurred before the Mid-Cycle Modification to the MWA's Four Year WIOA Local Plan was submitted to the Governor;
- the date on which the Oakland County Workforce Development Board approved the proposed Mid-Cycle Plan Modification;
- the date on which the proposed Mid-Cycle Plan Modification was posted on the County's website for review, comments, and input by the public, including representatives of business, labor organizations, and education;
- the date and time by which comments about and input on the proposed Mid-Cycle Plan Modification were to be received; and
- the name, address, e-mail address and fax number of the individual to whom comments about and input on the proposed Mid-Cycle Plan Modification were to be submitted.

- After the 30 day period for public review, comments, and input on the Mid-Cycle Plan Modification concluded, any comments that expressed disagreement with the Modification would be compiled and submitted to the Governor. These comments would be submitted with the Modification.

The MWA will maintain in its files documentation of the process the MWA followed to provide a 30 day period for public comment on the Mid-Cycle Modification to the WIOA Four-Year Local Plan.

**24. A Description of How One-Stop Centers are Implementing and Transitioning to an Integrated, Technology-Enabled Intake and Case Management Information System for WIOA and One-Stop Partner Programs:**

Service integration among the WIOA and One-Stop partner programs is ensured through the use of the "Michigan One-Stop Management Information System (OSMIS). The OSMIS is an electronic database system with numerous key features and components. Each of these components makes use of a single applicant record that contains all relevant information about that applicant. Since it is web-based, the OSMIS can be accessed from any site that has an Internet connection.

Service providers enter a customer's services into the OSMIS as these services are provided. Data can be entered only by, and data is displayed only to, users who have permission to see and use the information. Data that is entered on the OSMIS is available and accessible immediately thereafter.

The OSMIS tracks all services the provider has given the customer, regardless of whom the provider is or where the provider is located. It is a flexible system that can easily accommodate additional modules and/or features with relative ease. The TIA/WDA continuously implements enhancements to include the USDOL's reporting modifications, and to simplify program data entry and tracking.

To supplement the OSMIS, the Oakland County MWA may purchase "G\*STARS", a web-based system that provides a standardized platform for collaborative program management and reporting across workforce development programs. It also provides a means for program management, standardized documentation, and reporting.

**25. A Description of the Local Priority of Service Requirements:**

Section 134(c)(E) of the WIOA states that, with respect to a local area's funds for WIOA adult employment and training activities, "priority shall be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient". A description of the Oakland County MWA's "Local Priority of Service" requirements follows:

- As it provides the individualized career services that are described in Section 134(c)(A)(2) xii of the WIOA and the training services that are described in Section 134(c)(3)(D) of the WIOA, the Oakland County MWA will give priority for such services to adults who are one or more of the following:
  - public assistance recipients;
  - other low income individuals; and
  - basic skills deficient.

- The WIOA provides the following definitions for the foregoing individuals:
  - Public Assistance Recipients – “the term ‘public assistance’ means Federal, State, or local government cash payments for which eligibility is determined by a needs or income test”.
  - A Low Income Individual means an individual who:
    - “receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the program of block grants to States for temporary assistance for needy families program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the supplemental security income program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or State or local income-based public assistance;
    - is in a family with total family income that does not exceed the higher of—
      - (I) the poverty line; or
      - (II) 70 percent of the lower living standard income level;
    - is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)));
    - receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);
    - is a foster child on behalf of whom State or local government payments are made; or
    - is an individual with a disability whose own income meets the foregoing income requirements, but who is a member of a family whose income does not meet these requirements”.
  - A Basic Skills Deficient individual is an adult who “is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society”. The Oakland County MWA defines an individual 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, as an individual who:
    - computes, reads, writes, or speaks English at a grade level of 10.9 or below, as determined by a standardized assessment, including the Test for Adult and Basic Education (TABE); or

- lacks the short-term pre-vocational skills (i.e., the learning skills, communication skills, or the computer literacy skills) that an individual needs to prepare for unsubsidized employment or training, as documented by and in his/her comprehensive assessment; or
- is, as verified by and in his/her comprehensive assessment, an English language learner (i.e., an individual who has limited ability in reading, writing, speaking or comprehending the English language, and
  - whose native language is a language other than English; or
  - who lives in a family or community environment in which a language other than English is the dominant language); or
- requires additional assistance to enter or complete an education program in order to secure or hold employment, as documented by and in his/her comprehensive assessment. This individual:
  - has a core grade point average of less than 1.5 in any school, as verified by a school record; or
  - dropped out of any school for academic reasons, as verified by a school record; or
  - is deemed at risk of dropping out of any school for academic reasons, as verified by a school record.

The MWA recognizes that a grade level of 10.9 and below is relatively high, if it is considered within the context of some labor market areas and their in-demand occupations. The MWA has concluded, however, that an individual who reads and/or writes and/or computes at a grade level of 10.9 and below should be considered basic skills deficient, given Oakland County's labor market and its in-demand jobs and the skill levels job seekers need to obtain and retain these jobs. To reach this conclusion, the MWA considered the following points, which, unless otherwise noted, are excerpted from Section 1. of this Plan:

- Occupations with the greatest demand in Prosperity Region Ten, which includes Oakland County, overwhelmingly require a Bachelor's degree. Only four of the Region's top fifteen occupations require less than a four-year degree.
- Prosperity Region Ten's most in-demand occupations require a solid foundation in basic skills, including reading, communications, math, and cognitive abilities, that influence the acquisition and application of knowledge in problem solving.
- The professional, scientific, and technical services "super-sector", which is the "heart of the knowledge" economy, and the health care and social services sector will account for nearly half of the total new jobs Oakland County employers will create between now and 2020.

- The greatest wage gains among Oakland County's jobs will accrue to higher education service industries, and the smallest wage increases will occur in the lower-education service industries.
- Employers who responded to Oakland County's Skilled Needs Assessment surveys consistently stressed the need for strong communication and math skills, and most of the jobs these employers identified as most in-demand require post-secondary education credentials, including Doctoral, Master's, Bachelor's and Associate degrees and technical certifications.
- Most of the skilled trades apprenticeships that Oakland County's Apprenticeship Book describes require algebra and/or strong math skills.

Thus, to obtain and function in Oakland County's most in-demand jobs, individuals must read, write, and compute at and above a 11<sup>th</sup> grade level.

- The MWA's definition for "priority" follows: Each program year (i.e., July 1 through June 30), at least fifty-one percent of the MWA's new WIOA adult enrollees (excluding adult enrollees who are carried forward from previous program years) will be public assistance recipients and/or other low income individuals and/or individuals who are, as the MWA defines it, basic skills deficient.

As it determined the foregoing minimum percentage of new adult individual career service/training enrollees who should be public assistance recipients, low income, or basic skills deficient, the MWA considered the following data from the U.S. Census Bureau and the "2018 – 2020 Oakland County Economic Outlook":

- Ten percent of Oakland County's residents live in poverty.
- Two percent of Oakland County's residents receive public assistance.
- 93.5 percent of Oakland County's residents are high school graduates or higher.
- 57.7 percent of Oakland County's residents possess an associate's or higher degree.
- Oakland County's average per capita income is \$38,992 and its median family income is \$96,181.

The MWA believes that the percentage of adults who receive priority for WIOA individual career and training services should exceed these individuals' percentage of the total population. The MWA also believes, however, that many Oakland County adults who do not qualify for public assistance, or whose income exceeds low income guidelines, or who do not meet the MWA's definition of basic skill deficient also need WIOA services. Examples of these individuals follow:

- individuals who read, write, and compute at a level that exceeds grade 10.9, but that falls below a post-secondary level;
- older workers;

- veterans;
  - individuals who have substance abuse issues;
  - domestic abuse victims,
  - individuals whose basic workplace and/or occupational skills are (or are about to become) obsolete;
  - returning citizens;
  - individuals who have an inconsistent work history; and
  - individuals whose income falls below a self-sufficient wage, which the MWA defines as an individual income that is more than the U.S. Department of Housing and Urban Development's income level for a family of one to qualify for housing assistance. At present, this level is \$39,700, which is slightly higher than Oakland County's average per capita income level of \$38,992.
- The definitions of individuals for whom the MWA will give priority for WIOA Title I adult career and training services are not eligibility criteria for enrollment in the WIOA Title I Adult Program. Thus, the costs the Oakland County MWA incurs for serving individuals who are eligible for the WIOA Title I Adult Program, but who are not public assistance recipients, other low income individuals, or individuals who are basic skills deficient, will not be disallowed. In addition, the MWA will not incur disallowed costs if, in any given program year, less than fifty-one percent of its new WIOA Title I individual career service and training enrollments are public assistance recipients and/or other low income individuals, and/or individuals who are basic skills deficient.
  - During the program year, the MWA will periodically review its new WIOA Title I adult individual career service and training enrollments. If, as a result of these reviews, the MWA determines that less than fifty-one percent of these enrollments are public assistance recipients and/or other low income individuals and/or individuals who are basic skills deficient, the MWA and its service providers will take appropriate corrective actions. The MWA may, for example, more vigorously recruit these individuals, or the MWA may direct its service providers to serve only, or a higher percentage of, these individuals.

**26. A Description of How the Local Board will Coordinate the Local Area's Workforce Investment Activities with Statewide Rapid Response Activities:**

The Oakland County Workforce Development Board will use the following strategies to coordinate the Oakland County MWA's workforce investment activities with the statewide Rapid Response (RR) activities that are described in Section B. 27 of this Plan Modification:

- During Rapid Response and worker orientation meetings, the Oakland County MWA's Rapid Response staff person will coordinate the MWA's programs and services with the Rapid Response services that the state staff person provides. The MWA Rapid Response staff

person and the local partners will also provide information on the workforce investment activities and services that are available at the Oakland County Michigan Works! (One Stop) Service Centers and/or at the one-stop partners' facilities.

- If the workers' employer needs and seeks the lay-off aversion services that are described in Section B.27 of this Plan Modification, the MWA Rapid Response staff person will refer the employer to the MWA's Business Services Coordinator. He/she will then arrange subsequent meetings, at which appropriate partners (e.g., the Michigan Economic Development Corporation, the Oakland County Department of Economic Development and Community Affairs, local economic development agencies, and training institutions) can arrange a protocol of appropriate services.
- The MWA's Michigan Works! Service Centers will provide workshops on such topics as resume writing and interviewing skills. These workshops will be conducted on the employer's site and before the workers' lay-off.
- The affected worker who visits a Michigan Works! Service Center will be informed of and, as appropriate, receive one or more of the services that are described in Section B.7 of this Plan Modification. The worker's case manager will coordinate WIOA Title I services with the services of the centers' one-stop partners.

**27. A Description of the Local Area's Rapid Response Activities:**

A description of the Oakland County MWA's rapid response activities follows:

**a. Receipt of Notification:**

If the state is in receipt of a Worker Adjustment Retraining Notification (WARN) and/or receives a notice of a mass layoff or plant closing via the Michigan Unemployment Insurance Agency (UIA), a Union Official, the Company, the Michigan Economic Development Corporation, or an employee, the state's staff will contact the MWA's designated Rapid Response partner, making him/her aware of the notification and what information has been obtained thus far. This information includes, but is not limited to:

- 1.) the company's name, address, and telephone number;
- 2.) the company's contact name and title;
- 3.) a description of the business, including the North American Industry Classification System (NAICS);
- 4.) the type of dislocation (i.e., mass layoff or plant closure);
- 5.) the notification type (e.g., a WARN Notice, news article, letter, phone call, or other);
- 6.) the number of impacted workers and the total workers at the facility;
- 7.) a brief description of the impacted employees' skill sets and corresponding occupations that can be linked to a Standardized Occupational Classification code; and
- 8.) identification of potential days and times for a Rapid Response meeting and/or Worker Orientation (WO).

Likewise, if the designated MWA Rapid Response staff member has received a dislocation notice via a union official, the company, the local economic development corporation, a local newspaper or an employee, the staff member will contact state

staff and make them aware of the notification and what information has been obtained thus far, including, but not limited to, items 1. through 8. above.

Upon exchange of the aforementioned information, the MWA and state staff will mutually decide whether the MWA or the state will contact the employer. The lead contact will be responsible for the timely dissemination of information to other partners and key stakeholders to ensure that accurate and up-to-date information is available and communicated.

**b. The MWA as Lead Staff:**

If the MWA Rapid Response staff member is the lead contact, he/she will make initial contact with a company official; obtain additional information about the dislocation event; and obtain two preferable dates for a Rapid Response meeting and/or a Worker Orientation. Within 24-48 hours, the MWA Rapid Response staff member will contact the state staff member and other key partners to confirm the Rapid Response meeting date, and to share information about the event. If employees are covered by a collective bargaining agreement, the MWA staff member will contact local union officials about organized labor's participation in the Rapid Response meeting and/or Worker Orientation.

The state staff member will remain responsible for arranging UIA representation at the Rapid Response meeting and Worker Orientation. If UIA staff members are not physically available to participate, the state will try to make arrangements for their participation via a webinar, conference call, or through other technological means. If UIA staff is still unable to participate, MWA Rapid Response staff members should direct Rapid Response and Worker Orientation participants to the UIA's website, including the on-line claim filing kit (UIA Form 1251) and the on-line service Claimant Web Account Manager.

**c. The State as Lead Staff:**

If a state staff member is the lead contact, he/she will make initial contact with a company official; obtain additional information about the dislocation event; and obtain two preferable dates for a Rapid Response Meeting and/or a Worker Orientation. Within 24-48 hours, the state staff member will contact the MWA and other key partners to confirm the Rapid Response meeting date, and to share information about the event. If employees are covered by a collective bargaining agreement, the state will contact the local union officials about organized labor's participation in the Rapid Response meeting and/or Worker Orientation. The state staff member will contact the UIA to arrange for representation at the Rapid Response meeting and Worker Orientation, as described in step b. above.

**d. Rapid Response and Worker Orientation Meetings:**

1.) Rapid Response Meeting

The initial Rapid Response (company and union, if applicable, and leadership) meeting shall include MWA Rapid Response and state staff members and other local partners as necessary, including the UIA, the Michigan Economic Development Corporation, United Way, and the Department of Health and Human Services. The state staff member will provide overall information from a state perspective, and he/she will gather demographic information about the impacted workforce. The

MWA Rapid Response staff members will provide information on employment services (including Pure Michigan Talent Connect), dislocated worker activities and services, Trade Act eligibility and services, and other activities and services that are available at the local One-Stop Service Center(s). MWA representatives will provide copies of marketing brochures or other printed materials about participant services.

UIA presentations at Rapid Response meetings will include information on filing for unemployment benefits, the MARVIN on-line system, eligibility requirements, and training waivers. UIA representatives will provide appropriate fact sheets and unemployment benefit booklets.

During a Rapid Response meeting, priority should be placed, if possible, on averting or lessening the impact of the layoff. Key questions to ask include:

- What is the reason for the closing or downsizing?
- Can any specific resources be provided to prevent or lessen the closing or downsizing?
- What other departments or divisions within the business may be impacted by the closing or downsizing? What other companies may be impacted by the closing or downsizing?
- Are layoffs occurring in other locations or states?
- When will the information be made public? When will impacted employees be notified? (Confidentiality is key.)

In addition to the foregoing questions, additional questions that may be asked as part of the Rapid Response meeting are included in the "Rapid Response Data Form", which is Attachment 11 to the TIA/WDA's WIOA Manual.

## 2.) Worker Orientation Meeting

At the conclusion of a Rapid Response meeting, and upon agreement by the company, a Worker Orientation meeting(s) will be scheduled to provide the impacted employees information on available services. The MWA Rapid Response staff member will be responsible for the following items:

- a.) Confirming the date(s) and time(s) of the Worker Orientation meeting(s);
- b.) Arranging for the participation of partners from the local One-Stop Service Centers and other community agencies to present information; and
- c.) Providing informational materials on available services at the One-Stop Service Centers.
- d.) If the company does not agree to an on-site Worker Orientation meeting(s), the MWA Rapid Response staff member should attempt to arrange for an alternative date and location to meet with impacted workers as a group or individually, as necessary, and/or to provide information packets that can be distributed to impacted workers.

- e.) If the parties agree to schedule a Worker Orientation meeting(s) at a later date, the local MWA Rapid Response staff member will serve as the contact for the parties involved, and he/she will organize the meeting(s) as specified above. The state staff member will transmit the request to the UIA with the meeting date, time, and location. When a UIA representative confirms that he/she will attend, the state staff member will notify the MWA Rapid Response staff member. When the UIA cannot support a worker orientation with a speaker, either in person, via a webinar, or conference call, the MWA staff will direct impacted workers to the UIA's website, including the on-line claim filing kit (UIA Form 1251) and the on-line service Claimant Web Account Manager. MWA staff members should not answer Unemployment Insurance (UI)-related questions; instead, such questions will be referred to the UIA Employee Hotline at (866) 500-0017, or to the Claimant Web Account Manager online services page at [www.michigan.gov/uia](http://www.michigan.gov/uia).
- f.) In addition, the MWA Rapid Response staff member may distribute the Dislocated Worker Survey to impacted workers. This survey, which the TIA/WDA has developed, is available from the state in hard copy format and is described in TIA/WDA Policy Issuance (PI) #11-03.

3.) Inability to Schedule a Rapid Response or Worker Orientation Meeting:

- a.) If a Rapid Response or Worker Orientation meeting cannot be scheduled, or if the employer does not agree to on-site meetings, the MWA Rapid Response staff member should attempt to obtain the information in the Rapid Response Data Form and arrange for the distribution of printed information to the impacted employees. Information can be left at the worksite, with local union officials, given to the employer for inclusion with paychecks, etc.
- b.) When Worker Orientation meetings are not feasible due to the lack of employer cooperation, or when layoffs have already occurred, the designated MWA Rapid Response staff member will organize Worker Orientation meetings, as detailed above, at an offsite location. MWAs should provide written notice of the Worker Orientation meeting(s), if a mailing list of the employees is available from the employer. The state staff member will transmit the request to the UIA with the meeting date, time, and location. When a UIA representative confirms that he/she will attend, the state staff member will notify the MWA Rapid Response staff member. When UIA cannot support a worker orientation with a speaker, either in person, via a webinar, or conference call, the MWA staff member should direct impacted workers to the UIA's website, including the on-line claim filing kit (UIA Form 1251) and the on-line service. MWA staff members should not answer Unemployment Insurance (UI)-related questions; instead, such questions will be referred to the UIA Employee Hotline at (866) 500-0017, or the Claimant Web Account Manger online services page at [www.michigan.gov/uia](http://www.michigan.gov/uia).

e. Non-WARN Events and Lack of Notification:

- 1.) Rapid Response and Worker Orientation meetings may be held in situations that involve fewer than 50 employees, at the discretion of the MWA and the employer. MWA and state staff members will mutually agree if state staff participation is necessary for meetings that involve non-WARN events.

- 2.) When MWA Rapid Response staff members learn that a business has closed and no prior notification was given, the Rapid Response Data Form should be completed to the extent possible and e-mailed to state staff. The information from the Data Form, along with Dislocated Worker Survey data, will be used to:
  - a.) keep the Governor fully informed of dislocation events and their potential impact on local communities;
  - b.) respond to legislative and other inquiries;
  - c.) enable the TIA/WDA to make informed budgetary decisions about State Adjustment Grant (SAG) awards and WIOA discretionary funding; and
  - d.) comply with federal reporting requirements for maintenance of layoff information in the TIA/WDA WARN database.

**f. The MWA's Designated Rapid Response Partner:**

The Oakland County MWA's designated Rapid Response partner is Deborah Lake, whose contact information follows:

Ms. Deborah Lake  
Oakland County Michigan Works! Agency  
2100 Pontiac Lake Road, Dept. #437  
Waterford, MI 48328  
laked@oakgov.com  
(248) 858-5520

**g. The Coordination of Business Services, including Lay-off Aversion Services:**

The Oakland County MWA will take the following steps to include lay-off aversion as a component of its Rapid Response activities:

- 1.) During Rapid Response meetings with the company, leadership, and the union (if applicable), the MWA Rapid Response staff member will pose the following questions to determine if additional lay-offs are possible or likely:
  - a.) What is the reason for the closing or downsizing?
  - b.) Can any specific resources be provided to prevent or lessen the closing or downsizing?
  - c.) What other departments or divisions within the business may be impacted by the closing or downsizing? What other companies may be impacted by the closing or downsizing?
  - d.) Are layoffs occurring in other locations or states?
  - e.) When will the information be made public? When will impacted employees be notified? (Confidentiality is key.)

In addition to the foregoing questions, additional questions that may be asked as part of the Rapid Response meeting are included in the "Rapid Response Data Form" (Attachment 11 to the TIA/WDA's WIOA Manual).

- 2.) As he/she asks the foregoing questions, the MWA Rapid Response staff member will use as a guide the early warning signs that relate to the company's facilities,

markets, community, and organization. These warning signs are identified on the "Early Warning Checklist", which is in Attachment 9 ("Lay-off Aversion Guide") to the TIA/WDA's WIOA Manual.

- 3.) If the MWA's Rapid Response staff member and the company, its leadership and, if applicable, the union agree that early warning signs for future lay-offs exist, the MWA's staff person will consider whether the company is a viable candidate for lay-off aversion services. As he/she makes this consideration, the staff member will use as a guide the criteria on page 7 of Attachment 9 to the TIA/WDA's Manual. Viable company candidates may then be offered one or more lay-off aversion services that may include, but that may not be limited to, the following:
- Asset Mapping that identifies key community resources (e.g., business retention services, including financing, coaching, and employee retraining);
  - Pre-feasibility Studies that determine whether 1.) an employer can remain operational or 2.) workers should consider purchasing the company and continue its operation; and
  - Incumbent Worker Training.

These lay-off aversion services are described more fully in Attachment 9 to the TIA/WDA's WIOA Manual.

- 4.) If the MWA Rapid Response staff member and the company determine that the company needs and wants one or more of the foregoing services, the staff person will refer the company to the MWA's Business Services Coordinator. He/she will then arrange subsequent meetings, at which appropriate partners (e.g., state, county, and local economic developers and training institutions) can establish a protocol of appropriate services.

#### **h. Incumbent Worker Training:**

As noted above, the MWA will incorporate incumbent worker training (IWT) among its lay-off aversion services. To coordinate IWT with lay-off aversion, the MWA may use employer and worker assessments that determine whether IWT will avert a company's lay-offs, and to determine if the proposed training for a company's employees is appropriate. Such assessments will be used, for example, to ascertain whether the list of conditions that appear on page 9 of Attachment 9 to the TIA/WDA's WIOA Manual are met.

The MWA will also document whether employers who are candidates for IWT are "at risk" of downsizing or closing, or whether its workers are "at risk" of dislocation before IWT is provided. "At risk" means that the possibility or potential of downsizing or closing exists within an industry or company. As the MWA documents "at risk", it will use as a guide the charts that appear on pages 10, 11, and 12 of Attachment 9 to the WIOA Manual. These charts provide a comprehensive list of "at risk" indicators in the following four key areas: "regional community", "industry", "company/organization", and "facility/infrastructure". The MWA will determine that IWT is an appropriate use of workforce funds to avert lay-offs, mitigate their impacts, and maintain jobs, if the MWA identifies and documents at least one indicator from any of the foregoing four categories.

Finally, the MWA will determine, before it is provided, if IWT is a skill attainment activity,

which is defined as “skills that directly benefit the worker(s) receiving the training by making them more qualified in their field of employment and/or by providing them new skills for new product lines or processes that avert layoffs.” As it makes this determination, the MWA will use as a guide the criteria that appear on pages 12 and 13 of Attachment 9 to the WIOA Manual.

**i. Joint Action Committees:**

Joint Adjustment Committees (JACs) may devise and oversee an implementation strategy that responds to affected workers’ reemployment needs and interests. The JAC should use, as a baseline, the results of the Dislocated Worker Survey in TIA/WDA Policy Issuance (PI) #11-03.

Specific assistance that is available to the JAC include:

- 1.) funding the JAC’s operating costs, including the costs associated with having a neutral chair, so it can provide advice and assistance in designing and implementing Rapid Response activities and WIOA-authorized services to affected workers;
- 2.) providing a list of potential candidates to serve as the JAC’s neutral chairperson; and
- 3.) training and oversight of the JAC once it is established. A JAC may be established with the TIA/WDA’s support, when the following conditions are met: The company and, if applicable, the union, mutually consent to the JAC; at least 50 full-time workers are being laid off; and at least 60 days remain before lay-off activity commences.

The MWA will play the following roles in the function of JACs:

- 1.) A JAC may be established with the TIA/WDA’s support, when the conditions that are identified in Section B.27.i of this Plan Modification are met.
- 2.) The MWA will be the JAC’s fiduciary.
- 3.) When a JAC is established, it will select a neutral chairperson. While the selection process should be competitive, a JAC may ask that a neutral chairperson be selected as quickly as possible. In this instance, state staff and the MWA may survey available candidates and select one to serve as the JAC’s neutral chairperson.
- 4.) The TIA/WDA and the MWA will execute a JAC grant that specifies the activities the neutral chairperson will perform and the amounts for which he/she will be compensated. As this contract is executed, the MWA will comply with TIA/WDA Policy Issuance (PI) #18-13 (“Establishment of JACs”).
- 5.) The MWA will use JAC grant funds to execute a professional service contract with the JAC’s neutral chairperson. This contract will specify the neutral chairperson’s activities and expenses, and the amounts for which the chairperson will be compensated and/or reimbursed. The contract will also specify procedures for submitting invoices and the documentation that must accompany these invoices. As this contract is executed, the MWA will comply with TIA/WDA PI #18-13.
- 6.) The MWA will review and approve the Neutral Chairperson’s invoices and documentation.

- 7.) The MWA will compensate the neutral chairperson for the services he/she renders and the allowable expenses he/she incurs.
- 8.) The MWA will review and submit to the TIA/WDA grant payment requests and various reports that the neutral chairperson prepares, including the JAC's affected worker tracking sheet and the final narrative report, which will summarize the JAC's formation, mission, goals, activities, and results.
- 9.) An MWA staff person will a.) attend all JAC meetings; b.) provide JACs and their neutral staff person training, technical assistance, and information about programs and services; c.) be a liaison to other service providers; and d.) assist with other allowable JAC tasks, including the use of Dislocated Worker Survey data.
- 10.) As it administers the JAC, the MWA will comply with TIA/WDA PI #18-13 and the "JAC Member Handbook", which is available on-line at the [TIA/WDA website](#).

**j. Community Transition Teams (CTTs):**

Rapid Response may provide guidance and/or financial assistance to establish CTTs, which assist the impacted community in organizing support for dislocated workers. Support may include assisting dislocated workers in meeting their families' basic needs, including heat, shelter, food, clothing and other necessities that the MWA cannot provide. CTT funds will be allocated through a grant, which the MWA may request through state staff.

**k. State Adjustment Assistance Grants (SAGs):**

SAGs may provide the MWA additional assistance to address mass layoffs, plant closings, or other events that precipitate increases in the number of individuals who seek dislocated worker services. Activities funded by these grants must be consistent with the WIOA's Dislocated Worker guidelines. As appropriate, the MWA will complete the application form (Attachment 12 to the TIA/WDA's WIOA Manual).

Circumstances that would activate the MWA's request for a SAG follow:

- 1.) a specific level or percentage of the MWA's WIOA dislocated worker funding has been expended;
- 2.) a specific level or percentage of either local and/or regional unemployment;
- 3.) the number and size of actual or potential dislocation events;
- 4.) the time period between local dislocation events; and
- 5.) specific projects (e.g., comprehensive out-placement services) that are associated with a specific dislocation event.

**l. Contact Person:**

The Oakland County MWA designates the following person to be responsible for Rapid Response and Worker Orientation meetings, Joint Adjustment Committees (JACs), Community Transition Teams (CTTs), State Adjustment Grants (SAGs), and National Dislocated Worker Grants (NDWGs):

Jennifer Llewellyn, Director  
Oakland County Michigan Works! Agency  
2100 Pontiac Lake Road, Dept. #437  
Waterford, MI 48328  
llewellynj@oakgov.com  
(248) 452-2256

**ATTACHMENT A:**

**AN ANALYSIS OF PROSPERITY REGION TEN'S  
LABOR MARKET DATA AND ECONOMIC CONDITIONS, AS  
EXCERPTED FROM PROSPERITY REGION TEN'S WIOA REGIONAL PLAN**