WORKFORCE CONNECTIONS

WORKFORCE INVESTMENT ACT TWO-YEAR STRATEGIC COMPLIANCE PLAN

for

Southern Nevada Workforce Investment Area

FOR THE PERIOD: July 1, 2012 through June 30, 2014

Workforce Connections
7251 West Lake Mead Blvd., Suite 200
Las Vegas, Nevada 89128
(702) 638-8750/Fax (702) 638-8774

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Workforce Connections Two-Year Plan

A. Executive Summary

- 1. Workforce Connections (the Southern Nevada Workforce Investment Area) will implement the Workforce Investment Act (WIA) in accordance with the framework outlined in the Act with alignment of Nevada Governor's Workforce Investment Board with regard building a demand-driven system within the southern Nevada Workforce Investment Area. Workforce Connections and its appointed committees will be guided by the Governor Workforce Investment Board's Goals and Vision for designing a local workforce investment board within a demand driven workforce development system (Nevada JobConnect) that will meet or exceed the needs of local businesses and jobseekers. Concentrated efforts will be launched to align workforce development resources with essential partners—in particular, the state's office on economic development and Nevada's System of Higher Education, with community colleges serving as primary training components.
- 2. Workforce Connections' Two-Year Plan is to re-establish a governance goal that develops an effective, efficient workforce development system that meets the needs of its stakeholders. It provides a comprehensive overview of Workforce Connections' ongoing initiatives to accomplish its mission. This plan also highlights Workforce Connections' policies, tools and instruments used to implement WIA with regional and sectors strategies, and make adjustments for possible reauthorization guidance. Outlining well-defined strategies, this plan describes Workforce Connections' tactics and procedures for establishing clear-cut policies that allow businesses and jobseekers ready-convenient access to all available employment and training resources. Workforce Connections' fortified governance, backed by the strong oversight of Local Elected Officials and its managing board, will serve to establish sound organizational structure, and fiduciary efficiencies, while maximizing individual board member's participation and effectiveness.
- 3. Workforce Connections Resource System: The cornerstone of Workforce Connections is its One-Stop service delivery system called Nevada JobConnect which will unify numerous training, education and employment programs into a single, customer-friendly system. Workforce Connection will establish, maintain and oversee the operations of at least one comprehensive One-Stop Center in the Greater Las Vegas Area. Prior to the end of Program Year 2011 (June 30, 2012), Workforce Connections will have a Comprehensive One-Stop Center serving as the state's flagship of Nevada's Workforce Development One-Stop System, serving all southern Nevada residents. Workforce Connections will continue to ensure "universal access" for jobseekers and businesses through its One-Stop service delivery system and provide WIA core services to include:

4. One-Stop Services for Businesses

Recruitment and pre-screening of qualified applicants

- Easy access to post job listings through Nevada JobConnect Operations System (NJCOS), NV Trac, and Workforce Connections' funded partners/ service providers
- Job and industry/sectors growth trends and forecasts
- Wage data and other valuable labor market information
- Economic and business development assistance
- Education and occupational training opportunities
- 5. Employers have expressed their satisfaction of the value-added benefits from a single system for finding job-ready, skilled human capital that meet their needs. Through the One-Stop System (Nevada JobConnect), employers have a single point of contact to provide information about current and future workforce skills needed by their employees and to list job openings.

6. One-Stop Service for Jobseekers

- Information about Local, State, and National Labor Markets
- Job and Career Resources (computers, faxes, copy machines, telephones)
- Job Listings
- Hiring/Employment Requirements
- Job Referral and Placement Services
- Information on the Quality of Education and Training Programs
- Initial Screening for Training Eligibility
- Testing and Assessment
- Job Search
- Assistance in filing Unemployment Insurance Claims
- Information about the availability of local supportive services, including: childcare, transportation, various aid programs, other agencies and their complementary employment support services
- 7. Workforce Investment Board: Workforce Connections recognizes that the system described in detail throughout this document may need adjustments to conform to the upcoming Governor's Workforce Investment Board's goals and strategies. However, even with anticipated adjustments, this plan will still serve as the cornerstone for Workforce Connections to effectively implement and oversee employment and training services throughout its Workforce Investment Area. In future years Workforce Connections reserves itself and its funded partners the greatest flexibility possible, consistent with the Act and its regulations, to oversee and modify the workforce development system to meet demand-driven employment and training challenges.
- 8. System Structure: Southern Nevada Workforce Investment Area's Chief Elected Officials will continue its long-standing role as the grant recipient of Department of Labor funds and resources. Workforce Connections staff will provide local administrative and programmatic oversight, along with technical support to the Workforce Investment Board. Workforce Connections and the Southern Nevada Local Elected Officials Consortium have designated Nevada JobConnect Consortium to serve as the "Consortium Operator" for Southern Nevada JobConnect Center(s), i.e., the One-Stop Operator.

B. NOTICE OF PROPOSED PLAN AVAILABLE FOR PUBLIC COMMENT

Workforce Connections is the Southern Nevada Workforce Investment Board (SNWIB), serving the Southern Nevada Workforce Investment Area which consists of the counties of Clark, Esmeralda, Lincoln and Nye, and the cities of Boulder City, Henderson, Las Vegas and North Las Vegas, a Workforce Investment Act (WIA) administrative entity, as designated by the Governor of the State of Nevada. The WIA is a federally funded program that provides services for jobseekers and businesses. Workforce Connections' staff prepared and proposed a WIA Two-Year Strategic Plan, that reflects the goals and initiatives to comply with WIA requirements and align its resources with those of the Governor's Workforce Investment Board. This alignment ensures efficient and effective oversight of employment and training service delivery to individuals residing in the southern Nevada Workforce Investment Area. Workforce Connections' proposed plan also highlights the goals and objectives of its One-Stop Nevada JobConnect Workforce Development System to serve the universal population of jobseekers and employers during the period July 1, 2012 through June 30, 2014.

Workforce Connections made its Proposed Two-Year Plan available to receive public comment for a 10-day period beginning June 1, 2012 through June 10, 2012. The Public Comment Version of the Proposed Two-Year Plan was available at Workforce Connections' website: www.nvworkforceconnections.org. Paper copies of the Proposed Two-Year Plan were available for public review between the hours of 8:00 A.M. and 5:00 P.M., Monday through Friday at the Workforce Connections' Administrative Offices located at 7251 West Lake Mead Blvd., Suite 200, Las Vegas, Nevada 89128. Copies of the proposed plan were made available for public comment at the following locations:

Bridge Counseling Associates, 1701 West Charleston Blvd., Suite 400, Las Vegas, Nevada 89102 Foundation for an Independent Tomorrow (FIT), 1931 Stella Lake Drive, Las Vegas, Nevada 89106 GNJ Family Life Center, 2535 West Cheyenne Ave., Suite 107, North Las Vegas, Nevada 89032 Goodwill of Southern Nevada, 1280 West Cheyenne Ave., North Las Vegas, Nevada 89030 Help of Southern Nevada, 1640 East Flamingo Road, Suite 100, Las Vegas, Nevada 89119 Latin Chamber of Commerce Community Foundation, 300 N. 13th Street, Las Vegas, Nevada 89101 Nevada JobConnect—119 Water Street, Henderson, Nevada Nevada JobConnect—3405 South Maryland Parkway, Las Vegas, Nevada Nevada JobConnect—2827 Las Vegas Blvd., North, North Las Vegas, Nevada Nevada Partners, Inc., 710 West Lake Mead Blvd., North Las Vegas, Nevada 89030 Southern Nevada Children's First, 720 West Cheyenne, Suite 30, North Las Vegas, Nevada 89030 Southern Nevada Regional Housing Authority, 5390 East Flamingo Road, Las Vegas, Nevada 89122 Nye Communities Coalition, 1020 East Wilson Road, Pahrump, Nevada 89048 Lincoln County – Youth Career Program

Questions regarding the Proposed Two-Year Plan are to be directed to: Ardell Galbreth, Interim Executive Director, at (702) 638-8750 or via e-mail at: agalbreth@snvwc.org.; however, there were no inputs received from the public.

C. General Plan Information

- 1. Goals and Objectives
 - a. Workforce Connections' Mission Statement: To develop a world-class workforce development system that complements the State of Nevada's overall education and economic development strategy and guides federal, state and local employment and training resources in a customer focused, and user-friendly manner promoting a high quality, competitive workforce.
 - b. Workforce Investment System Philosophy: To have universal access for all; be organized around One-Stop Centers (One-Stop System); has strong year-round youth component; and targets adult, youth and dislocated workers.
- 2. Authentication and Plan Approval: In accordance with the federal Workforce Investment Act, the undersigned Chief Local Elected Official Chairman and Local Workforce Investment Board Chairperson have approved the Local Workforce Investment Board Plan, and agreed to operate or cause to be operated programs pursuant to this plan. The undersigned certifies that they concur with the contents of this plan and agree that it shall be carried out through funded partners/contracted service providers as well as participating One-Stop Partners through the attached Memoranda of Understanding (MOU). The undersigned further certifies that no sub-grant shall be executed without the concurrence of the designated local elected officials, the Local Workforce Investment Board, and the state of Nevada. This plan consists of this page, the Table of Contents, and all of the sections and attachments indicated on the Table of Contents.

Approved for Workforce Connections

Hannah M. Brown, Chairperson Workforce Connections				
Date:				
Approved for Local Elected Officials				
Lawrence Weekly, Chairman Southern Nevada Chief Elected Officials				
Date:				

D. Assurances and Certifications

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying", in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.
- (4) This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more that \$100,000 for each such failure.
- (5) This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 29 CFR Part 98, Section 98.510, Participants' responsibilities. The regulations were published as Part VII of the May 26, 1988 Federal Register (pages 19160-19211).

Approved for Workforce Connections

Hannah M. Brown, Chairperson	
Workforce Connection	
Date:	_
Approved for Local Elected Officials	
Lawrence Weekly, Chairman	
Southern Nevada Chief Elected Officials	
Data:	

CERTIFICATION REGARDING DEBARMENT, SUSPENSION, AND OTHER RESPONSIBILITY MATTERS PRIMARY COVERED TRANSACTIONS

This certification is required by the regulations implementing Executive Order 12549, Debarment and Suspension, 29 CFR Part 98, Section 98.510, Participants' responsibilities. The regulations were published as Part VII of the May 26, 1988 Federal Register (pages 19160-19211).

(BEFORE SIGNING CERTIFICATION, READ ATTACHED INSTRUCTIONS WHICH ARE AN INTEGRAL PART OF THE CERTIFICATION)

- (1) The prospective primary participant certifies to the best of his/her knowledge and belief, that his/her and his/her principals:
 - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;
 - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a pubic (Federal, State, or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - (c) Are not presently indicted for or otherwise criminally or civilly charged by a government entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
 - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State, or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

INSTRUCTIONS FOR CERTIFICATION

(Debarment)

- 1. By signing and submitting this proposal, the prospective <u>primary</u> participant is providing the certification set out below.
- 2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why he/she cannot provide the certification set out below. The certification or explanation will be considered in connection with the Department of Labor's (DOL) determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
- 3. The certification in this clause is a material representation of fact upon which reliance was placed when the DOL determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the DOL may terminate this transaction for cause or default.
- 4. The prospective primary participant shall provide immediate written notice to the DOL if at any time the prospective primary participant learns his or her certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
- 5. The terms "covered transaction", "debarred", "suspended", "ineligible", "lower tier covered transaction", "participant", "person", "primary covered transaction", "principal", "proposal", and "voluntarily excluded", as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the DOL for assistance in obtaining a copy of those regulations.
- 6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, he/she shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the DOL.
- 7. The prospective primary participant further agrees by submitting this proposal that he/she will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion--Lower Tier Covered Transactions", provided by the DOL, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
- 8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless he/she knows that the certification is erroneous. A participant may decide the method and frequency by which he/she determines the eligibility of his/her principals.
- 9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause.

The knowledge and information of a participant is not required to exceed, that is normally possessed by a prudent person in the ordinary course of business dealings.

Approved for the Workforce Connections

Date:

10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the DOL may terminate this transaction for cause or default.

Hannah M. Brown, Chairperson
Workforce Connections

Date:

Approved for Local Elected Officials

Lawrence Weekly, Chairman
Southern Nevada Chief Elected Officials

NONDISCRIMINATION AND EQUAL OPPORTUNITY REQUIREMENTS OF WORKFORCE INVESTMENT ACT

- (1) As a condition to the award of financial assistance under WIA from the Department of Labor, the grant applicant assures, with respect to operation of the WIA funded program or activity and all agreements or arrangements to carry out the WIA-funded program or activity, that he/she will comply fully with the nondiscrimination and equal opportunity provisions of the Workforce Investment Act 1998, including the Nontraditional Employment for Women Act of 1991 (where applicable); title VI of the Civil Rights Act of 1964, as amended; section 504 of the Rehabilitation Act of 1973, as amended; the Age Discrimination Act of 1975, as amended; title IX of the Education Amendments of 1972, as amended; and with all applicable requirement imposed by or pursuant to regulations implementing those laws, including but not limited to 29 CFR part 34. The United States has the right to seek judicial enforcement of this assurance.
- (2) The grant applicant certifies that he/she has developed and maintains a "Methods of Administration" pursuant to 29 CFR 34.33.
- (3) The grant applicant is attaching information pursuant to 29 CFR 34.24 (a)(3)(ii) where applicable, including the name of any Federal agency other than the Department of Labor's Directorate of Civil Rights that conducted a civil rights compliance review or complaint investigation during the two preceding years in which the grant applicant was found to be in noncompliance; and shall identify the parties to, the forum of, and case numbers pertaining to, any administrative enforcement actions or lawsuits filed against it during the two years prior to his/her application which allege discrimination on the ground of race, color, religion, sex, national origin, age, disability, political affiliation or belief, citizenship or participation in WIA.

Note: No findings of noncompliance in the last two years.

Approved for Workforce Connections

Hannah M. Brown, Chairperson	
Workforce Connections	
Date:	
Approved for Local Elected Officials	
Lawrence Weekly, Chairman	
Southern Nevada Chief Elected Officials	
Data	

CERTIFICATION REGARDING DRUG-FREE WORKPLACE REQUIREMENTS

- A. The grantee certifies that he/she is or will continue to provide a drug-free workplace by:
 - (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
 - (b) Establishing an ongoing drug-free awareness program to inform employees about:
 - (1) The danger of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
 - (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
 - (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will:
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendars days after such conviction;
 - (e) Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
 - (f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted:
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
 - (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

B.		Il provide in the space below the primary address of the entity in connection with this grant.	
	(Name of Organi	nization, street address, city, and zip code):	
	Name of Organiz	zation: Workforce Connections	
	Street Address:	7251 West Lake Mead Blvd., Suite 200	
	City: Las Vegas	S	
	Zip Code: <u>8912</u>	2.8	
	Name/Title of A	Authorized Signatory: Ardell Galbreth, Interim Executive	e Director
	Signature:		
	Date:		
		Approved for Workforce Connections	
		Hannah M. Brown, Chairperson Workforce Connections	•
		Date:	
		Approved for Local Elected Officials	
		Lawrence Weekly, Chairman Southern Nevada Chief Elected Officials	•
		Date:	

ASSURANCES/CERTIFICATIONS - the LWIB assures and certifies that all programs and activities funded under the Workforce Investment Act will comply with:	Federal, State and Workforce Connections Policies and/or Procedure Title, Effective/Revision Date
A. GENERAL PLANNING:	
1. Section 117, §661.300, §661.305, §661.315 & §661.325, which establishes the Local Workforce Investment Board (LW1B), its functions and certification requirements. (Please attach copy of current LWIB agreements and membership list)	
2. Section 117 (d) and §661.350, which establishes the responsibilities of the LWIB in respect to all stages of program planning, policy setting, oversight, evaluation, and implementation. The LWIB meeting agendas and minutes of meetings, which indicate the extent of the LWIB's involvement in the WIA program are available for review upon request.	Workforce Connections By-Laws, Dated August 24, 2005
3. § 661.305 (a)(1), which ensures the LWIB, in partnership with local elected officials, is responsible for developing the Local Workforce Investment Board Plan, including the involvement by representatives of participating One-Stop Partners.	·
4. Section 118(c)(1&2) and □ §661.345(b & c), which requires the local board to make available copies of a proposed plan to the public through such means as public hearings and the local media; allow members of the local board and members of the public including representatives of business and labor organizations, to submit comments on the proposed local plan to the local board, not later than the end of the 10-day period beginning on the date on which the proposed local plan is made available; and include with the local plan submitted to the Governor any comments that express disagreement with the plan.	
5. That the proposed plan, annual modifications and plan revisions have been made available for public review and comment. [\$661.345(b)] If applicable, date of public hearing: NA If comments were received, copies of these responses should be attached. NA—No comments were received.	Fodoral State and
ASSURANCES/CERTIFICATIONS – the LWIB assures and certifies that all programs and activities funded under the Workforce Act will comply with:	Federal, State and Workforce Connections Policies and/or Procedure Title, Effective Revision Date

6. Section 118 (b)(1)(A-C), which requires the LW1B to use appropriate labor market and demographic analysis as the basis for planning programs to ensure (1) a systematic assessment of local labor market needs and problems; and (2) that occupational training provided is in occupations for which job opportunities exist and at the level of skills required by private employers. 7. Section 134(d)(4)(A)(iii) and §663.310 (c), which requires	
training provided with funds made available under this Act shall be only for occupations for which there is a demand in the area served or in another area to which the participant is willing to relocate, and consideration in the section of training programs may be given to training in occupations determined to be in sectors of the economy which have a high potential for sustained demand or growth.	
B. PROGRAM DESIGN:	
1. §662.230, which requires access to mandated One-Stop Partners core services through the One-Stop delivery system.	
2. §663.110, §663.115, §663.220, §663.230, §663.310, and §§664.200-220, which define eligibility requirements for adult and dislocated worker core, intensive, and training services, as well as youth services.	
C. PROGRAM MANAGEMENT:	
1. Section 188, §667.275, and 29 CFR Part 37, which requires the LWIB and all subrecipients not to discriminate in employment or in the provisions of services based on race, religion, color, national origin, sex, age, marital status, arrest without conviction, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in programs funded under the Act.	
2. §667.266 and §667.275(3)(b) which requires the LWIB and its subrecipients not to place participants in the construction operation, or maintenance of any facility which is used or to be used for sectarian instruction or as a place for religious worship.	
3. Workforce Investment Act Letter (WIAL 3-99), which requires that participation in programs and activities financially assisted in whole or in part under this act shall be open to citizens and nationals of the United States, lawfully admitted permanent resident aliens, lawfully admitted refugees and parolees, and other individuals authorized by the Attorney General to work in the United States.	
4. §667.630, which requires that programs funded under the	

Act, will be administered in full compliance with safeguards against fraud and abuse.	
5. §667.200(d), which requires LWIB and its subrecipient/subcontractors to comply with the debarment and suspension regulations.	
6. Section 188, 29 CFR Part 37, and §667.275 (a)(3), which require all recipients to provide physical and programmatic accessibility and reasonable accommodation to WIA program services in compliance with Section 504 of the Rehabilitation Act and the Americans with Disabilities Act.	
7. 29 CFR Part 37.34, which requires that all grant recipients and their subrecipients must indicate in recruitment brochures and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper, to staff, clients, or to the public at large that the WIA Title I program or activity described "is an equal opportunity employer/program" and that "auxiliary aids and services are available upon request to individuals with disabilities." These materials must indicate that the program or service provider may be reached by telephone, and must state the telephone number of the Telephone for Deaf and Deafened (TDD) or relay services used as required in □29 CRF Part 37.9(c).	
8. 29 CFR Parts 37.29-33, which requires public notice of EEO provisions.	
9. §667.274, which requires that LWIB and its subrecipients assure compliance with State and Federal health and safety laws as well as to assure the maintenance of workers' compensation insurance on all WIA work-related activities.	
10. §667.600(f), which requires LWIB and its subrecipients to develop a system for the handling of complaints of discrimination from participants in accordance with the Section 188(a) of the Act, regulations and policies issued by the State.	

E. Document List

- 1. Current Workforce Connections Agreement and Membership List
- 2. Current Youth Council Membership List
- 3. Proof of Plan Publication
- 4. Copy of Public Comments, if Applicable
- 5. Workforce Connections Organizational Chart

F. Board Members:

- 1. Roles and Responsibilities: It is philosophically recognized that work is inherent to human experience and historically, the nature of work has been and will continue to be determined by the nature of the economy. Even though the State of Nevada's economy is currently struggling with a slow recovery, fortunately, with the legislative mandated industry and regional sector strategies, priority emphasis is geared to partnerships between education, economic and workforce development systems to leveraging resources in an effort to create workforce demands through economic development and fulfill such demands through quality employment and training services, using Nevada's community college system as a primary training component.
- 2. To reboot Nevada's economic vitality, public policy must encourage the growth of high skill, high-wage jobs, and ensure there is an adequate number of workers with the skills necessary to succeed in those jobs. To this end, the *mission* of Workforce Connections is to continue to improve upon a Local Workforce System that is inclusive of:
- Two Workforce Investment Boards, i.e., one in northern Nevada and one in southern Nevada.
- Creating and maintaining a flexible, highly skilled workforce that will perpetuate a continuous competitiveness for local businesses.
- Expanding the breath and depth of partnership involvement in a collaborative manner within the workforce system to maximize optimum customer service.
- Fostering efforts that shall increase personal income and business capital.
- Insuring that the local Nevada JobConnect System (Workforce Investment System) is the "first choice" for all jobseekers, workers and employers in Southern Nevada who are in need of employment and training services.

G. The following briefly describes how the Workforce Connections plans to achieve the following objectives:

1. Improve the quality of Nevada's workforce to meet the needs of employers and jobseekers:

It is recognized that in any job training and employment environment, the employer is the key to success. Locally, employers can be assured that when the decision is made to recruit employees through the Nevada JobConnect System (Workforce Development System) they are selecting from a pool of individuals who can best satisfy their employment needs. It is Workforce Connections' responsibility to establish and oversee a process that jobseekers who enter this hiring pool/system are prepared and have the necessary skills, knowledge and resources to meet the needs of the employers. In other words, Workforce Connections is called to meet southern Nevada's demand-driven workforce needs. It is also the goal of Workforce Connections to ensure that this system is designed to be driven by employers—demand driven. While aligning Workforce Connections' resources and training strategies with those of Nevada Governor's Office of Economic Development, a series of surveys, questionnaires, and employer focus group meetings will continue to be at center stage in obtaining firsthand employment demands and industries sectors intelligence. Workforce Connections' local workforce system components will be adjusted to meet local labor market demands as identified by the Governor's Workforce Investment Board strategic plan.

2. Workforce Connections Two-Year Plan—Enhance the productivity and competitiveness of the State of Nevada:

It is the goal of Workforce Connections to enhance the productivity and competitiveness of the State by providing the jobseekers and the employers, the opportunity to access a never before seen wealth of employment resources via the One-Stop JobConnect delivery system. This goal as set by both the State and its Local Workforce Investment Boards will be accomplished with at least one comprehensive One-Stop Center, i.e., a physical One-Stop Center conveniently located in the Clark County—Las Vegas area, and a number of affiliate One-Stop sites strategically located throughout southern Nevada Workforce Investment Area—including rural areas affiliate One-Stop sites. By empowering jobseekers with both the means and knowledge to acquire competitive workforce skill-sets, Nevada will be well positioned to grow its economy while competing globally on a grand scale that highlights our quality workforce. It is our plan to assist southern Nevada's local area customers and the State of Nevada in their efforts to increase productivity and competitiveness with a local workforce investment system that is sound, complimentary, and compatible with our State economy.

3. Increase the employment, retention, and profits of employers utilizing the Workforce System Investment;

a. It is a recognized fact that a poorly trained and unskilled labor force in the workplace leads to high turnover rates and increased costs. To minimize and eventually eradicate this dilemma in southern Nevada, Workforce Connections will negotiate strict contract requirements for WIA service providers to supply "state of the art" high skill, high wage training programs designed to meet the needs of the employer and to provide the job seeking customers "life long learning" that will ensure employment retention. The local workforce investment system will underscore the value of On-the-Job Training (OJT) and seek state assistance in facilitating incumbent worker activities. The skill sets learned

through OJT will be meaningful, timely and portable, so that the employee retains value to multiple employers.

- b. Workforce Connections will also integrate into the system broadly agreed-upon, world-class occupational skills and academic standards essential to raising the achievement level and retention rate of workers. The cost savings benefits of employer-designed customized training and retraining programs will be effectively marketed to all businesses as a means by which the local workforce system can assist them in raising the levels of their workers productivity which will result in an overall increase in their profits.
- c. Additionally at the local level and based upon the availability of the Governor's Workforce Investment Board funds or direct grants from the U.S. Department of Labor, Workforce Connections plans to oversee the implementation of an "incumbent worker program." Such a Plan will be developed that will incorporate an incumbent worker system that will be accessible, and responsive to the needs of local businesses and be effectively linked to labor, economic development organizations and other contemporaneous learning resources such as community colleges and universities. The targeted population for this program will be workers in low/entry wage level jobs who are in need of the skills that will retain them in their jobs, as well as, provide upward mobility to higher paying jobs and at the same time provide increased capital for businesses.
- d. Workforce Connections will also continuously provide policy vigilance. For example, the Board's well descriptive guidance will completely integrate into the local workforce system multiple employment programs that will enhance the productivity and job retention of workers resulting in increased profits for businesses and tax payers receiving a satisfactory return on their investment.

4. Reduce welfare dependency and increase self-sufficiency;

It is the goal of Workforce Connections to build a system that reduces welfare dependency and increases self-sufficiency by leveraging funds, and forming a consortium of partners that consists of individuals and agencies that have a proven expertise in dealing with welfare recipients or individuals who have low or below median income and the working poor. This will be accomplished through the "user friendly JobConnect One-Stop System," in which jobseekers—both low income and others job seekers will be furnished with detailed information pertaining to employment opportunities.

5. Increase occupational skill attainment by job seekers;

Education, training and employment services will be available to all who access the Nevada JobConnect System. Jobseekers who demonstrate the need to enhance, upgrade, or require higher-level occupational skills will be encouraged by the Nevada JobConnect partners. Education utilizing Nevada's Higher Education System, training and employment placement programs shall include class room training, on-the-job occupational skills training, entrepreneurial training, job readiness training, adult education and literacy activities, plus other skills training will be recommended where appropriate. Education, training and

employment services will also be available for workers seeking their first job, a new job, a better job, nontraditional employment or those requiring additional skills to enable them to enter or return to the job market.

6. Increase the employment retention and earnings of employees;

It is the intent at the Local Workforce Investment Board level to maintain a system that supports not only those individuals who are unemployed, but those who are seeking to improved their job skills. Recognizing that both groups have many of the same goals and objectives (employment, retention, and increased earnings), efforts will be made to recruit training/service providers that understand they will be held accountable for job placement, retention, and increases in wages or benefits for their customers. Percentages for job placement, job retention, and an increase in earnings will be measured and reported to the state and Workforce Connections' employment community. Workforce Connections anticipates employers will actively recruit from this local workforce system.

- H. Workforce Connections Youth Council (WIA Section 117, §661.005, §661.315 and §661.325): The following describes the organization and structure of Workforce Connections, including organizations and entities represented on the Board:
 - 1. Workforce Connections, formally known and recognized as The Southern Nevada Workforce Investment Board was established as a public agency in the State of Nevada, pursuant to NRS 82.011 and 277.180:

Workforce Connections is considered a public agency by virtue of the fact that it is governed by a consortium of city and county governments. Workforce Connections Board membership is comprised of the following organizations and entities.

- a) State of Nevada Department of Employment, Training and Rehabilitation
- b) City, County elected officials representing the Southern Nevada Workforce Investment areas, political jurisdictions
- c) Local Business Sector
- d) WIA Title I Service Providers
- e) Community Based Organizations
- g) Economic Development Organization
- h) Secondary and Post Secondary Education
- i) Employment Trade Associations/Organizations
- 2. The following describes the process Workforce Connections used to identify and select its Board members:

In an effort to obtain qualified representatives to serve on the Workforce Connections Board, a number of recruiting methods were used to solicit nominations. Media, correspondence, and word of mouth were among the few methods used at the local level. A letter containing a nomination form, an outline of board member responsibilities, qualification requirements, a member/candidate profile, and the selection criteria were submitted to potentially interested

organizations. Letters were also sent to trade associations, the local Chambers of Commerce (Asian, Women, Boulder City, Caliente, Esmeralda, Goldfield, Latin, Lincoln, North Las Vegas, Pahrump Valley, Urban) Cox Communication, St. Rose Dominican Hospital, Associated General Contractors, Mandalay Resorts and Southwest Gas Corporation. Although there were many letters sent to various entities, the majority of nominations came by way of advertisement which were published in the Boulder City News, El Mundo, Henderson Home News, Las Vegas Review Journal, Las Vegas Sun, and the Las Vegas Sentinal Voice.

3. The following describes how Workforce Connections will carry out its roles and responsibilities outlined in §661.305;

In an attempt to minimize the efforts of the entire Board, duties will be assigned and completed in a committee structure. All work and/or recommendations completed by the committees will be brought to the entire board at its regular scheduled meetings. The Workforce Connections Board will meet as outlined in its by-laws at least four times a year to review program progress, hear and consider committee reports and approve or recommend policy changes and budget approval to the Local Elected Officials.

4. Interaction with the State Workforce Investment Board;

Workforce Connections will coordinate with, and assist the Governor's Workforce Investment Board in the development of state and local plans, which will encompass the development of local performance measures and sector strategies. Workforce Connections will also seek guidance and input from the Governor's Workforce Investment Board in the interpretation of state and federal laws, and any applicable federal regulation. Furthermore, Workforce Connections' in partnership with the Governor's Workforce Investment Board and other essential partners such as the Governor's Office of Economic Development, Nevada's System of Higher Education, i.e., community colleges, and local area businesses, will assure that the previously fragmented system of planning and service delivery is replaced by a state-wide integrated and coordinated system. Also, representatives from Workforce Connections will be available to serve as members of the Governor's Workforce Investment Board and committees and sector councils to ensure state and local collaboration.

- 5. Attached is a list of current Workforce Connections members. Included is the organization and the membership category each individual represents as required under WIA Section 117 (b)(2), §661.315. (See Attachment B)
- 6. The following describes how local elected officials fulfill their role as decision-making partners with Workforce Connections;

The Local Elected Officials (LEOs) have elected to sit on and become active members of Workforce Connections Board of Directors. The LEOs consortium who have the fiduciary responsibilities outlined in the Act will be involved in the decision making process of the Workforce Connections' Board and approve all budgets in connection Workforce Investment Act funds. Additionally, the Local Elected Officials will meet separately from the Workforce Connections' Board

when appropriate, to exercise the responsibilities and duties identified in the WIA that are exclusively theirs.

7. Youth Council (WIA) Section 117(h)(2&4), §661.335, §661.340 and §664.110(c)

Workforce Connections' Youth Council will be an advocate for youth, in terms of ensuring that programs are put in place to address the needs of disadvantaged and "at risk" youth who may be school drop-outs. The youth council shall also assist the state in eliminating the proficiency exam failure rate and increase youths' preparation in the math and science studies. The youth council will focus greater attention toward those youth who are aging out of the foster care system, those incarcerated youth who will be re-entering society, and those youth with developmental and physical disabilities, as well as those who are homeless.

8. The following describes the process Workforce Connections used to select youth council members;

In an effort to recruit qualified youth council members to serve, a committee survey was provided to each Workforce Connections' board member soliciting volunteers who were interested in youth activities. In addition, Workforce Connections bylaws require its members to serve on either a committee and/or council in order to engage themselves in active Board participation.

- 9. Attached is a list of the current youth council members. The list includes the organization each individual represents; See Attachment C.
- 10. The following describes the roles and responsibilities of the youth council, including its oversight responsibilities of local youth programs;
 - a. The primary role/function of the youth council will continue to serve as an advisory entity to Workforce Connections. In this capacity, the youth council members will provide expertise in youth policy and ensure that recommended provider(s) of youth services serve youth who are eligible for WIA services and are receiving the assistance they need to become productive individuals in society.
 - b. Responsibilities of the youth council are to coordinate youth activities, develop portions of the youth plan that deals with eligibility, recommend eligible service providers through a competitive process, facilitate oversight compliance of eligible providers of youth activities, and establish linkages with educational agencies, as well as, community-based organizations.
 - c. The youth council will facilitate the leveraging of resources available in the Southern Nevada Workforce Investment Area, and ensure that youth who are part of the juvenile justice system, state welfare and foster care agencies, will be served to the extent resources permit. The council shall set clear policy direction for creating employment opportunities and career pathways for eligible youth ages 14-21 years, both in school and out of school.

d. One of the council's major goals is to improve the efficiency and quality of youth services through the identification of gaps in services and activities. The needs of youth in and out of school will be addressed as well as the importance of continuous services in meeting the needs of youth in the 21st century.

I. Economic Development/Local Labor [WIA section 118(a)(1)(A-C)] and §661.350

- 1. The following describes how Workforce Connections will meet the needs of employers, jobseekers and workers in the local workforce investment area;
 - a. The needs of employers and jobseekers were identified primarily from statistical data derived from Nevada's Department of Employment, Training and Rehabilitation, Research and Analysis Bureau that include wage and growth estimates in the most demanding occupations. (Attachment D)
 - b. To ensure timely feedback from employers representing each of the four cities and four counties in the Southern Nevada Workforce Investment Area, business focus groups, healthcare, hospitality and manufacturing advisory sectors/groups were formed. These groups have the responsibility of identifying employer requirements such as; experience required, training requirements, desired skill sets, soft skills needed, and current or projected labor market demands.
 - c. In coordination with Nevada JobConnect employer services unit, and in response to Nevada Senate Bill 152, sector councils in the Southern Nevada Workforce Investment Area will be focused on keeping the business communities appraised of the one-stop delivery system and the benefits of utilizing the system. These sector councils will also solicit feedback from employers and businesses regarding what works well, what needs to be improved, and what additional services should be added to enhance Nevada JobConnect. Similarly, members of Workforce Connections who represent areas outside of Clark County (rural), work with the Rural Nevada JobConnect office to identify unique challenges facing rural jobseekers. It is envisioned that the combined efforts of Workforce Connections and rural area chambers of commerce will identify possible entrepreneurial and business attraction, and employment opportunities.
- 2. The following describes how coordination with employers and economic development officials occurred in the development of the local workforce investment system: Coordination activities with employers and economic development officials will be continuous to ensure alignment of southern Nevada's local workforce investment system in the following manner:
 - a. Local elected officials appointed to Workforce Connections board are key individuals who represent workforce and economic development administrators. Nevada's Department of Employment, Training and Rehabilitation in support of the Governor's Office of Economic Development has provided critical input into the development of the Southern Nevada local workforce system.
 - b. Local elected officials appointed principal executives of leading private sector businesses to Workforce Connection Board of Directors who understand and support the state's economic development initiatives, and ensured there will be a

continuous dialogue between board members addressing their mutual workforce development concerns. Workforce Connections' Board of Directors, which is made up primarily of business representatives and employers, are essential components of Southern Nevada' workforce development system. Workforce Connections' will have assigned, dedicated staff to work with the business community in developing business relationships.

- 3. The following describes how the current and projected employment opportunities are identified in both the private and public sectors, and how jobseekers can obtain the necessary job skills to fulfill workforce demands;
 - a. Information regarding the current and forecasted employment opportunities and the necessary skills to obtain such employment are acquired from Nevada's Department of Employment, Training and Rehabilitation, Bureau of Research and Analysis, Nevada JobConnect Resource Centers, urban/rural chambers of commerce, urban/rural economic development agencies, post-secondary training institutions, apprenticeship training programs, local business journals and publications, labor union employment, businesses, human resources "hot lines" private sector employment agencies, state and federal government employment solicitation, internet, job fairs, public libraries and local visual/verbal/printed news media.
 - b. Working closely with economic development entities, Workforce Connections will have at its disposal information regarding outlining businesses/employers skill set needs which will allow Workforce Connections to contract directly with appropriate training partners like community colleges to fulfill any demand-driven skills. Also, Workforce Connections will continue to hold/sponsored employer focus groups in support of the state's sector strategies to ascertain project employment opportunities, as well as projected needed skills.
- 4. The following describes how Workforce Connections identifies the needs of employers, jobseekers, and workers to fulfill demand-driven job skills;
 - a. As identified in Nevada's Integrated Workforce Plan, meeting all of our employers' skill-set needs will be a challenge; however, using Nevada Career Information System (NCIS), Workforce Connections will be able to guide its contracted workforce development service providers to focus on current and projected skill gaps. Additionally, Workforce Connections' layoff aversion plan as supported by Nevada's Department of Employment, Training and Rehabilitation, will offer employers sure-ready resources that help improve their bottom line profits, thereby averting staff reductions.
 - b. The jobseekers will have ready access to employment services resources either through Nevada JobConnect, contracted service providers and on-line using Workforce Connections' virtual One-Stop System network.
- 5. The following describes any additional indicators of performance established by Workforce Connections;

In addition to the required negotiated performance measures established by the Department of Labor and the State of Nevada, Workforce Connections has added participant enrollments and financial expenditure rate as required performance measures that is passed on to its subrecipients (service providers).

6. The following describes how customer satisfaction data will be evaluated and used to improve services and customer satisfaction;

Customer satisfaction data and information will be shared with the operators of the Nevada JobConnect One-Stop System, Workforce Connections' staff members, and the general public as requested, to ensure quality improvement takes place.

- 7. The following describes how Workforce Connections will evaluate performance and what corrective actions (including sanctions and technical assistance) will take place if performance falls short of expectations;
 - a. It is the commitment of Workforce Connections to comply with both state and federal regulations and policies. Workforce Connections' staff has developed local performance measures and policies to generate reports detailing each service provider's performance. Service providers' performance is reported to all Workforce Connections' board members at least monthly.
 - b. When service providers fall below established performance measures and fail to take positive corrective action, Workforce Connections' staff will offer technical assistance and guidance to assist service providers in improving their performance and/or correcting noted findings. If, after technical assistance is provided along with detailed corrective action guidance, service providers still do not achieve established performance measures, Workforce Connections' staff will recommend to its Board of Directors appropriate sanctions against service providers as outlined in Workforce Connections Policy 5.2 (Non-Compliance Sanctioning Process. (Attachment E)

J. One-Stop System [WIA Section 121 and §661.350(3)(I-ii)]

- 1. The following describes how Workforce Connections plans to ensure continuous improvement of eligible providers of service and ensure that such providers meet the employment needs of local employers and WIA program participants;
 - a. Workforce Connections publishes Requests for Proposals (RFPs) to solicit responses for employment and training services delivery. The selection of service providers is based on respondents/proposer's demonstrated ability of meeting both the employer and jobseekers needs. Workforce Connections' staff monitors service providers' employment and training programs at least annually to ensure that services are engineered to meet the needs of the jobseekers and perspective employers.
 - b. Customer satisfaction surveys, along with Workforce Connections' established performance indicators are used to ensure customers' needs are

adequately addressed when accessing the Southern Nevada Workforce Investment Area's systems, i.e., Nevada JobConnect. In addition, jobseekers, sector councils, focus groups, and periodic round table discussions with businesses and service providers, training providers, and the employment community take place to encourage the agencies and businesses to foster continued improvement of services.

2. The following describes how Workforce Connections will designate and certify One-Stop Operators in the local area;

Workforce Connections has agreed that a consortium of the mandatory partners will serve as the One-Stop Operator for the Southern Nevada Workforce Investment Area. It is understood that this consortium of agencies, will embody the utmost quality of customer service, and a level of efficiency that will be predicated on the following requirements:

- a. Must enter into a Memorandum of Understanding (MOU) with Workforce Connections relating to the operation of Southern Nevada Workforce Investment Area One-Stop system that meets the requirements of 20 CFR 662.330 of WIA regulations and section 121.
- b. Must establish a foundation for integrating the WIA required One-Stop partners into a non-duplicating, collaborative seamless system of service delivery that will enhance access to the programs and services and improve long-term employment outcomes for individuals receiving assistance.
- c. Must establish a system that ensures a range of workforce development services is carried out by One-Stop partners and is easily accessible to individuals seeking assistance.
- d. Must provide all WIA specified core services to customers.
- e. Must have experienced staff versed in all aspects of local labor market information, employment and training programs and WIA regulations.
- f. Must have a fiscal accountability system in place that consists of policies and procedures which exemplify integrity, financial competency of Generally Accepted Accounting Principles and a thorough knowledge of federal monetary regulations.
- g. Must have a demonstrated history of salient performance in employment and training programs that addresses the needs of a diverse population of adults and dislocated workers.
- 3. The following indicate the mandated partners outlined in §662.200 that are participating in Workforce Connections' (Southern Nevada Workforce Investment Area) One-Stop system, and how access to each participating partners' core services will be provided in accordance with §662.320;

a. Title I Programs:

Bridge Counseling Associates

Foundation for an Independent Tomorrow (FIT)

GNJ Family Life Center

Goodwill of Southern Nevada

Help of Southern Nevada

Latin Chamber of Commerce Community Foundation

Nevada JobConnect—119 Water Street, Henderson

Nevada JobConnect—3405 South Maryland Parkway, Las Vegas

Nevada JobConnect—2827 Las Vegas Blvd., North, North Las Vegas

Nevada Partners, Inc., 710 West Lake Mead Blvd., North Las Vegas

Southern Nevada Children's First

Southern Nevada Regional Housing Authority

Nye Communities Coalition

Lincoln County - Youth Career Program

Job Corps

Migrant Seasonal Farm Worker

Veterans Employment and Training Services

Department of Employment, Training, and Rehabilitation (DETR) Wagner Peyser

College of Southern Nevada, Adult Education and Literacy

College of Southern Nevada, Vocational Education authorized under Carl D.

Perkins Act Department of Employment, Training, and Rehabilitation (DETR)

Vocational Rehabilitation

AARP, Title 5 Older Americans Act

Department of Employment, Training, and Rehabilitation (DETR) Trade Adjustment Act (TAA) & NAFTA Chapter 41 of Title 38, United States Code (local veterans employment representative and disabled veterans outreach program

Community Service Block Grant Act (CSBG)

Department of Housing and Urban Development (HUD)

Department of Employment, Training, and Rehabilitation (DETR)

Unemployment Insurance

- b. It is envisioned that customers entering the Nevada JobConnect system will be able to receive a full array of information regarding the services offered by each partner. However, there are core services common to all partners. Core Services of each of the partners will be offered to customers in the following manner:
 - (1) Self service job search
 - (2) Employment information, performance and cost associated with training providers, local area performance, and availability of supportive services
 - (3) Assistance in filing unemployment claims
 - (4) Educational and financial aid information
- c. Core services are available through the resource center on a self service basis and/or with minimal staff assistance.

- d. Based upon an individual's need, he or she may be referred to the appropriate One-Stop center or system partner for additional core services. The need for this level of core service will be determined through a simple, easy to negotiate self-assessment instrument.
- 4. COORDINATION The Act requires coordination between the Local Workforce Investment Board and the program/agencies listed in Section 112(b)(8)(A) to enhance the provision of services and avoid duplication of services with these program/agencies. The following briefly describes the linkages established for each of the programs/agencies listed, including the type of agreement(s) with each.
 - a. WIA One-Stop System partners' resources will be identified and leveraged to avoid duplication of services as outlined in Memorandums of Understanding (MOU) and Workforce Connections' policies. Partners' contributions of core services will result in increased services for jobseekers and businesses—while freeing WIA funds and resources to expand greater employer services and identification of demands for human capital with appropriate skill-sets.
 - b. Sector Councils have been established to provide input and guidance in the type of services needed and desired by the business community. Through MOUs, linkages with partnering agencies may include:
 - (1) Employer Access to Information and Services
 - (2) Application Screening and Referral
 - (3) Application Assessment and Testing
 - (4) Training Available to New/Current Employees and Employers
 - (5) Assistance to New/Current Employees with Value-Added Services to Employers
 - (6) Labor Trends and Wage Information
 - (7) Economic and Business Development Assistance
 - (8) Customer Service and Performance Accountability
 - (9) Outreach and Marketing to Employers
- 5. The following describes the requirements for coordination of WIA training funds and other grant assistance. [§663.320]
 - a. As outlined in Workforce Connections' policies, prior to granting or authorizing the use of WIA training funds, Workforce Connections' subrecipients are required to seek partnering non-WIA funds, including in-kind resources. If

after first seeking non-WIA funds for training services, WIA funds may be authorized for eligible participants' training services.

- b. Training services through Nevada's community college system/Nevada System of Higher Education will be the primary method of providing occupational skills training for adults and dislocated workers. Training services will be authorized for participants who have received core and intensive services, but were unable to obtain or retain employment through such services. To receive training services, participants must be evaluated/assessed by contracted services providers' case managers to determine if they possess the skills and qualifications needed to participate successfully in the training activity in which they expressed an interest.
- c. Eligible participants will receive authorization to participate in training activities at an institution/agency contained on the State of Nevada Approved Eligible Training Providers List. Participants shall choose their training activity after consulting with Workforce Connections service providers' case managers.
- 6. Public Comments/Process [WIA Section 118(c)(1&2) and §661.345(b) and (c). The following describes the process used by Workforce Connections to provide opportunity for public comment, including comment by representatives of business and labor organizations and input into the development of the local plan, prior to submission of the plan to Workforce Connections Board of Directors.
 - a. Upon completion of Workforce Connections proposed plan, announcement of the plan will be published in local area newspapers throughout the Southern Nevada Workforce Investment Area. The published announcement/article indicated that the proposed plan will be accessible at Workforce Connections' official website at: www.nvworkforceconnections.org.
 - b. The announcement also encouraged Southern Nevada Workforce Investment Area residents, business representatives and labor organizations to submit written comments regarding the proposed plan to Workforce Connections. The media announcement included the date, time and place to receive the proposed plan.
- 7. The following describes how Workforce Connections will ensure the public has access to Board meetings and information regarding Workforce Connections activities, including membership and meeting minutes;
 - a. Official meeting agendas and minutes will be posted in accordance with Nevada's Open Meeting Law which requires public notices announcing such meeting at least three business days prior to the scheduled meeting. Additionally, official agendas and meeting minutes will be posted on Workforce Connections' website at: www.nvworkforceconnections.org. Posted official meeting agendas and minutes will advise the public as to information regarding Workforce Connections activities.
 - b. Public comments in disagreement with the proposed plan shall be submitted to Workforce Connections' Board of Directors for its review and consideration.

Workforce Connections will document receipt of all public comments received regarding its two-year plan. Comments in disagreement with the proposed plan will be referred to Workforce Connections' Executive Director for review and possible incorporation into the two-year plan.

K. Program Management and Program Design [WIA Section 134 Subpart (d)(4)(E)]

- 1. The following describes the criteria established to determine the availability of funds and the process by which any priority for services to recipients of public assistance and other low income individuals will be applied under Section 134(d)(4)(E);
 - a. Based on allocated funds received by Workforce Connections, priority of services may be instituted to ensure those most in need of assistance receive the necessary employment and training services to become gainfully employed. When priority of services is instituted, Workforce Connections will establish priority categories for eligible adult participants using household income levels.
 - b. In addition to income levels, as part of its deliberations, Workforce Connections will consider the designation of multiple employment barriers which may include the following categories: Individuals with Substantial Language or Cultural Barriers, Ex-Offenders, Homeless Individuals, and Other Hard to Serve Populations as Defined by the Governor's Workforce Investment Board Plan.
- 2. The following describes the policy(s)/guidelines established for service providers in conducting the assessment process for both youth and adult (core, intensive and training services) participants;
 - a. Workforce Connections established policies outlining assessment requirements for adults, dislocated worker and youth program participants. Workforce Connections policy outlines that contracted service providers shall conduct objective assessments on all participants prior to delivering intensive and training services. (Attachment F)
 - b. All partners within the Southern Nevada JobConnect System have committed to provide core services on behalf of their targeted populations, and to the greatest extent allowed by funding resources, to the general public. Specific details for each agency are contained within Southern Nevada JobConnect One-Stop System MOUs. (Attachment G)
- 3. The following describes how Workforce Connections will meet the employment and training needs of the dislocated worker; displaced homemakers; low income individuals; public aid recipients and individuals with multiple barriers;
 - a. Workforce Connections has three design features of a successful delivery system that offers employment and training services to dislocated workers; displaced homemakers, low income individuals, public aid recipients and individuals with multiple barriers. These three features are: accessibility, visibility, and universality.

- (1) Accessibility refers to the ease by which jobseekers, i.e., dislocated workers, displaced homemakers, low income individuals, people with disabilities. For example, any job seeking customer, can access the services provided by Southern Nevada JobConnect One-Stop Center Delivery System. By establishing four primary One-Stop Centers in the Southern Nevada Workforce Investment Area, access to services in each major population area is ensured.
- (2) Visibility refers to the degree with which jobseekers are made aware of the existence of the One-Stop Centers and the services and benefits available to them through Nevada's Workforce Development System, i.e., Nevada JobConnect. In addition to Southern Nevada's comprehensive One-Stop Center, several contracted service providers' workforce resource centers (affiliate sites) are strategically located and visible within the communities in which they exist. Visibility of the workforce resource center is enhanced with ongoing and effective public relations campaigns. An internet website is maintained to provide access to information about services available to both jobseekers and employers through the workforce resource centers.
- (3) Universality refers to the ability of Southern Nevada's One-Stop Delivery System to meet the needs of all its customers, i.e., jobseekers and businesses. While Workforce Connections recognizes that customer needs, appropriate services and eligibility criteria vary widely, it has designed a system that provides universal access to all core services. As outlined in WIA, the Southern Nevada One-Stop (JobConnect), Workforce Development System services are tiered to provide core, intensive, and training services to adults, dislocated workers and all other targeted population groups through the One-Stop Delivery System.
- b. The Nevada JobConnect Workforce Development System has been designed to accommodate the individual needs of businesses and jobseekers. By involving a wide array of partner agencies and service providers, the available activities will be tailored or customized to meet the unique needs of southern Nevada's diverse population. To the greatest extent possible, the specific expertise of one-stop partners and service providers will address the varied needs of the population group identified in the Southern Nevada Workforce Investment Area.
- 4. Describe the core services to be provided to adults and dislocated workers [WIA Section 134(d)(2)];
 - a. Core services in the one-stop system are available to individual adults and dislocated workers, and are provided by each one-stop partner which includes:
 - (1) Orientation to the full range of available services in the One-Stop Resource Centers;
 - (2) Determination of eligibility for WIA, Title I, and other programs;
 - (3) Initial assessment of skill level, aptitudes, and supportive services needs;

- (4) Job Search, placement assistance, and where appropriate, career counseling;
- (5) Local, regional, and national labor market information;
- (6) Job vacancy listings;
- (7) Information on skills needed to get various jobs;
- (8) Local occupations in demand with skill requirements and earnings;
- (9) Performance and cost information about training providers and schools;
- (10) Information regarding filing claims for unemployment compensation;
- (11) Availability of financial assistance for training and education; and
- (12) Availability of local supportive services, including:
 - (a) Various aid programs
 - (b) Other agencies and their services
- b. Follow-up services for customers attaining unsubsidized employment, for not less than 12 months after the first known day and employment.
- 5. The following describes how the core services will be delivered [§663.155];
 - a. Core services are delivered through each One-Stop Center and by all contracted service providers. All individuals have universal access to the One-Stop System's core resources and services.
 - b. Using the Southern Nevada Workforce Development client tracking system, i.e., NV Trac program, delivered core services, as well as clients' activities are tracked and recorded to allow One-Stop Center managers to effectively assign resources in support of clients' core services activities.
- 6. The following describes any core services an individual must receive before receiving intensive services [§663.160], including any minimum time period for participation in core services before receiving intensive services [§663.165];
 - a. As previously indicated, core services in the one-stop delivery system are available to individual adults and dislocated workers, and are provided by each one-stop partner which include:
 - (1) Orientation to the full range of available services in the One-Stop Resource Centers;
 - (2) Determination of eligibility for WIA, Title I, and other programs;

- (3) Initial assessment of skill level, aptitudes, and supportive services needs;
- (4) Job Search, placement assistance, and where appropriate, career counseling;
- (5) Local, regional, and national labor market information;
- (6) Job vacancy listings;
- (7) Information on skills needed to get various jobs;
- (8) Local occupations in demand with skill requirements and earnings;
- (9) Performance and cost information about training providers and schools;
- (10) Information regarding filing claims for unemployment compensation;
- (11) Availability of financial aid assistance for training and education; and
- (12) Availability of local supportive services, including:
 - (a) Childcare
 - (b) Transportation
 - (c) Various aid programs
 - (d) Other agencies and their services
- b. Follow-up services for customers attaining unsubsidized employment, for not less than 12 months after the first known day and employment. Individuals must receive at least one core service before they are eligible to receive intensive services.
- 7. The following describes the intensive services to be provided to adults and dislocated workers:
 - a. Intensive services will be provided to adults and dislocated workers that meet certain eligibility requirements (must have received at least one core service), and have not been able to obtain employment through core services, and are in need of intensive services in order to obtain employment. The following may be considered intensive services:
 - (1) Comprehensive and specialized assessments of skill levels (including diagnostic testing);
 - (2) In-dept interviewing and evaluation to identify employment barriers;
 - (3) Development of Individual Employment Plans;

- (4) Group Counseling;
- (5) Individual counseling and career planning;
- (6) Case management for participants seeking training services;
- (7) Short-term prevocational training;
- (8) Referrals to community services;
- (9) Referrals to training. (Individual must receive at least one intensive service before they can receive training services). Out of area job search and relocation assistance:
- (10) Literacy activities related to basic workforce readiness; and
- (11) Internships and work experience based on an assessment or individual employment plan.
- 8. The following describes how these intensive services will be delivered [§663.210];

Employment and training intensive services will be delivered through contracted service providers and partners of the One-Stop Delivery System. Individuals may access intensive services after receiving at least one core service and still could not obtain gainful employment.

- 9. The following describes the eligibility criteria for adults and dislocated workers to receive intensive service [§663.220];
 - a. After adults and dislocated workers have received at least one core service and still could not obtain employment, they may be eligible for intensive services. In addition to the receipt of core services, adult and dislocated workers must be at least 18 years of age and eligible to work in the United States of America and show proof of the following:

Social Security Account Number
U.S. Selective Service (*Males Only*)
Birth Date/Age establishing the age of 18 years old

- b. In addition to meeting the requirements for adult services, dislocated workers must meet the following:
 - (1) Individual has been terminated or laid off, or has received notice of termination or layoff, from employment;
 - (2) Individual must be eligible for or must have exhausted entitlement to unemployment compensation; or

- (3) Individual has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that was not covered under the State of Nevada unemployment compensation law.
- 10. The following describes the criteria used to determine whether an employed worker needs intensive services to obtain or retain employment leading to "self-sufficiency." [§663.230];

Workforce Connections promotes the incumbent worker concept to allow employed or underemployed workers to retain employment or gain livable wages through promotions and/or increased wages leading to self-sufficiency. Specific emphasis has been placed on Workforce Connections incumbent worker program as outlined by the Governor's Workforce Investment Board, with service providers establishing partnerships with employers to identify employees and develop training programs customized to fit their business goals and objectives.

11. The following describes any intensive services an individual must receive prior to receiving training services [§663.250] including any minimum time period for participation in intensive services to be eligible for training services [§663.250];

Although Workforce Connections requires no specific time period for a participant to undergo intensive services, the following are considered intensive services available to eligible jobseekers:

- (1) Comprehensive and specialized assessments of skill levels (including diagnostic testing, etc.);
- (2) In-dept interviewing and evaluation to identify employment barriers;
- (3) Development of Individual Employment Plans;
- (4) Group Counseling;
- (5) Individual counseling and career planning;
- (6) Case management for participants seeking training services;
- (7) Short-term prevocational training;
- (8) Referrals to community services;
- (9) Referrals to training. (Individual must receive at least one intensive service before they can receive training services).Out of area job search and relocation assistance;
- (10) Literacy activities related to basic workforce readiness; and

(11) Internships and work experience based on an assessment or individual employment plan.

12. The following describes the criteria for individuals to receive training services

After receiving at least one intensive service and jobseekers still are unable to obtain work, they may be eligible to receive training services if they are at least 18 years old and provide the supporting documentation to verify their right to work eligibility as outlined in both state and Workforce Connections' policies.

- 13. The following describes what supporting documentation will be required when training services have been deemed appropriate for an individual;
 - a. Documentation indicating the individual has received at least one intensive service must be established prior to receipt of training services.
 - b. When applicable, special participant populations must meet low income eligibility criteria detailed under the State of Nevada WIA Compliance Policy—Priority of Services and documentation to support at least one of the following:
 - (1) For individuals with substantial language or cultural barriers
 - (a) Self Certification
 - (b) English as a Second Language Evaluation
 - (2) For ex-offenders
 - (a) Prison records
 - (b) Prison identification
 - (c) Other documentation from correction agency
 - (3) For homeless individuals: Written statement from social service agency, shelter, or individual providing temporary shelter
 - (4) For Demand occupations:
 - (a) Describe what supporting documentation will be required to ensure that the selection of a program of training services is linked to employment opportunities either in the local area or in another to which the individual is willing to relocate. [§663.310];
 - (b) At least one of the following sources must be used to document occupations that are directly linked to employment opportunities in the Southern Nevada Workforce Investment Area or in another area where the jobseeker is willing to relocate:

(c) Demand occupations listing published by the Department of Employment, Training, and Rehabilitation or from appropriate state agency where the individual is willing to relocate; Training agreement signed by the employer; Local want ads or internet website announcements, indicating at least three openings; Letter or telephone contact with employers; or Three job order searches documented in the service's comment's section of NJCOS. For individuals willing to relocate, a written statement from the jobseeker indicating their willingness to relocate must accompany the documentation previously listed.

14. The following describes the criteria used by Workforce Connections to determine the appropriate length of time for an OJT contract;

- a. Workforce Connections has established policy guidelines for service providers to limit OJT contracts to the period of time that is required for the participant to become competent in the occupation for which they are being trained. The start and end dates of training must appear in service providers' contracts with associated employers.
- b. The justification for the timeframe must be documented in the participant's individual employment plan (IEP) based on the skill level of the participant and required occupational skills of the job, the participant's work history, and any other factor that may effect the time period of the training.
- 15. The following and attached describes the guidelines/policy(s) established for providing OJT or Customized Training Activities. Please see Workforce Connections Policy 3.8—Attachment H for what types of supportive services will be available for OJT participants:
 - a. Workforce Connections authorizes its contracted service providers to deliver participant's supportive services. Duplicate participant supportive services must not be made available through other agencies, and the participant must be unable to provide such service for themselves, and the supportive services are necessary, reasonable, and allowable in accordance with WIA to allow the participant to participate in employment and training activities.
 - b. Generally, the following are allowable supportive services in accordance with Workforce Connections' policies: transportation, i.e., bus pass/tokens, dependant care, housing assistance (rental assistance), employment related equipment and supplies, and additional supportive services necessary for the participant to engage in WIA training activities (Such as Health/Sheriff Cards, eyeglasses, and minor auto repairs.)

16. The following describes what limits on the amounts or duration of funds for supportive services have been established [663.810]

a. Workforce Connections allows its service providers the flexibility to develop supportive services policies and procedures that are tailored and deemed appropriate to meet the needs of the local community.

- b. Workforce Connections requires service providers to develop policies and procedures that include the following assurance elements:
 - (1) That coordination and referrals with other entities are in place to prevent duplication of services;
 - (2) That the support services provided are allowable, necessary, and reasonable for the individual to participate in WIA Title I activities. **Note:** Supportive services shall not be provided as a stand-alone service, and must only be provided to support other WIA activities;
 - (3) That all services providers' staff is knowledgeable of other support resource entities that are accessible within the Workforce Investment Area;
 - (4) Criteria that determine when funds are unavailable for necessary support services, and how such services may be provided and funded; and
 - (5) Criteria that ascertains the provisions as to the granting of an exception to the established criteria of service and cost of services.
- 17. The following describes how the level of needs-related payment will be determined [663.840]: Workforce Connections does not authorize needs related payments.
- 18. The following describes how the "deficient in basic skills literacy" criteria in [§664.2000 (c) (1) will be defined and documented]

Workforce Connections uses the State of Nevada definition for basic literacy skills deficiency, which reads as follows: The individual computes or solves problems, reads, writes, or speaks English at or below the eighth grade level or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society.

19. The following describes the use and control of the five (5) percent window for the non-economically disadvantaged youth participants [§664.220];

Workforce Connections does not encourage services to non-economically disadvantaged youth participants. However, when such services do occur, service providers must document the exception prior to service delivery.

- 20. The following describes the design framework for youth program design [§664.400] in the local area, including the ten required program elements listed in this section. [WIA Section 129 (c) (2) and §664.410];
 - a. Workforce Connections has designated several youth providers to serve as the focal points for all youth service delivery in the Southern Nevada Workforce Investment Area. Funded youth service providers along with independent youth services vendors ensure quality youth services are delivered to eligible youth participants.

- b. Funded youth service providers will be selected by Workforce Connections to provide management and control of WIA youth funded programs. Service providers are responsible for outreach, recruitment, screening, determination/certification of eligibility of youth for WIA programs, and coordination of youth support services and activities consistent with the rules, regulations and guidelines established by Workforce Connections.
 - (1) Youth services provided shall include, but are not limited to:
 - (a) Recruitment;
 - (b) Outreach;
 - (c) Screening;
 - (d) Certification of eligibility of WIA youth participants and referral to appropriate agencies;
 - (e) Coordination with the Nevada JobConnect system;
 - (f) Labor Market Information;
 - (g) Outreach to determine employer's needs;
 - (h) Job Development;
 - (i) Organizing job fairs;
 - (j) Referring qualified older youth to employers for employment opportunities
 - (3) Two concepts are at the heart of managing the WIA youth programs: Integration of systems resources and services, plus performance-driven outcome based measurements.
 - (a) Integration of systems, resources and services are ultimate goals which go beyond co-location and technological access to provide a seamless, single referral source to all eligible youth customers.
 - (b) **Performance-driven outcome based measures** are the criteria by which successful youth programs are judged. Measures which will be followed are: entered employment rate, wage at placement, wage gains at follow up, employment retention, credential rate, basic skills, work readiness and/or occupational skills attainment, secondary school diploma or equivalent attainment, and customer satisfaction.
 - (4) Ten Required Program Elements: There are ten required program elements, of which eight must be available to all eligible youth participants through Workforce Connections' funded youth providers:

- (a) Tutoring, study skills training, and instructions leading to secondary school completion, including school dropout prevention strategies.
- (b) Alternative secondary school offerings.
- (c) Summer employment opportunities directly linked to academic and occupational learning.
- (d) Paid and unpaid work experiences, including internships and job shadowing, as provided in 20 CFR 664.460 and 664.470.
- (e) Occupational skill training.
- (f) Leadership development opportunities that include community service and peer-centered activities encouraging responsibility and other positive social behaviors.
- (g) Supportive services that may include the services outlined in 20 CFR 664.440.
- (h) Adult mentoring for a duration of at least 12 months, that may occur both during and after program participation.
- (i) Follow-up services as outlined in 20 CFR 664.450 for at least 12 months.
- (j) Comprehensive guidance and counseling, including drug and alcohol abuse counseling as well as referrals to counseling as appropriate the needs of the individual youth.
- 21. The following describes how Workforce Connections will ensure that service providers adhere to the 30% minimum expenditure requirement for out of school youth programs;
 - a. Each youth service provider is required to indicate both in-school and out-of-school youth served, and the amount of funds expended in each category on every youth services reimbursement invoice submitted.
 - b. Workforce Connections financial staff reviews all youth services invoices and their required monthly financial reports to ensure funding for services delivered to out-of-school youth is at least 30% of the total amount expended.
- 22. The following describes the planned rapid response provider and activities at the local level;

Service providers are teamed with employer services rapid response staff members. Upon receipt of a rapid response notification, service providers assign appropriate staff to deliver briefings and core services to jobseekers identified as a result of rapid response activities.

23. The following describes how Workforce Connections will coordinate rapid response activities with the State Rapid Response Team;

Workforce Connections staff and its funded service providers are members of southern Nevada rapid response teams. Coordination is an integral part of Workforce Connections' contracted service providers' role in support of rapid response activities.

24. The following identifies the entity responsible for the disbursal of WIA grant funds:

Workforce Connections has the sole responsibility for disbursing WIA grant funds to contracted service providers/funded partners. In turn, service providers have the responsibility for disbursing WIA funds to participants in the form of service delivery.

25. The following describes the competitive and noncompetitive process that will be used to award grants and contracts for activities under Title I including how potential bidders are being made aware of the availability of grants and contracts;

Workforce Connections uses the Request for Proposal (RFP) process to solicit service providers' proposals. All proposals are reviewed and rated during a competitive process conducted by qualified evaluators using Workforce Connections evaluators' selection process. Respondents are made aware of RFPs through published newspaper announcements and posting of RFPs on Workforce Connections' website at: www.nvworkforceconnections.org.

26. The following describes how Workforce Connections will identify training providers to be recommended for certification as eligible for receipt of WIA vouchers from individual training accounts (ITAs);

Training providers are recommended to the State of Nevada for approval based on their capacity to effectively deliver training services to eligible participants. Workforce Connections' staff reviews all southern Nevada training providers' certification request applications and provides input to the State of Nevada with an appropriate recommendation.

- 27. The following describes the process for requesting a provider be removed from the eligible training provider list;
 - a. Workforce Connections' staff monitors and assesses all training providers' delivery of required training services and activities. After providing technical assistance and recommended corrective action, Workforce Connections' staff

conducts follow-up reviews to verify training providers' corrective action and compliance of training services delivery.

- b. If appropriate corrective action or progress is not made, Workforce Connections staff recommends to the State of Nevada Workforce Investment Support Services (WISS) that the identified training provider be removed from the approved eligible training providers list.
- 28. The following describes how the consumer report (performance information)[§663.570] will be prepared and updated, including any supplemental information to be provided customers in supporting informed customer choice and achievement of local performance measures [§663.575];

The State of Nevada has the responsibility for preparing consumers training reports. Upon receipt of consumer training reports, they are posted and made visible at each Nevada JobConnect One-Stop Center and service providers' local offices.

29. The following describes the process for identifying eligible providers of youth activities [WIA Section 123];

All youth service providers are identified through a competitive process using RFP solicitations. Upon receipt of service providers' proposals, Workforce Connections' staff conducts a technical assistance review to verify all necessary components outlined in the RFP were met. Workforce Connections' staff also provides qualified proposals evaluators inputs regarding the performance of current/incumbent proposers/respondents. Upon completion of evaluators' review of proposals, recommendations for award and funding are to the youth council for review and make further recommendations to Workforce Connections' Board of Directors for award approval.

- 30. The following identify the criteria Workforce Connections uses in awarding grants for youth activities including criteria used to identify effective and ineffective youth activities and providers.
 - a. Generally, Workforce Connections uses the following criteria for awarding grants for delivery of youth activities:
 - (1) Program Design (Proposals respondents/service providers must illustrate their program overview, outline their program goals and performance measures; describe the effectiveness of their case management services; demonstrate their job placement services, indicate what supportive services they plan to deliver, and outline youth services outreach and recruitment strategies);
 - (2) Ability to Serve Special Youth Populations (Ex-offenders, foster children, economic disadvantage, and physically impaired youth)
 Collaborations and partnerships (Service providers must describe their employment and training linkages and collaborative efforts);

- (3) Available Funds to Leverage with WIA Services and Activities (Service providers must indicate non-WIA funding sources and the amounts available for leveraging);
- (4) Creativity and Innovation in Delivering Effective Youth Services (Service providers are required to outline their agency's creativity and innovation in developing and delivering youth employment and training services);
- (5) Experience in Serving Youth to Achieve Skill Credentials (Service providers are required to Illustrate their ability to help youth attain educational achievements, skills and qualify for apprenticeships);
- (6) Program Management Systems (Demonstrated capacity to capture participant data and submit reports on a regular basis in a timely manner);
- (7) Financial Management System (Service providers must submit their cost allocation plan and demonstrate the effectiveness of their financial system); and
- (8) Services to the Entire Workforce Investment Area (Service providers must describe their agency's strategy to provide youth services throughout Southern Nevada Workforce Investment Area).
- b. Each area is scored using a point scale, with heavier weighted points designated to areas where Workforce Connections places significant emphasis. After proposals are rated/scored, they are placed in an order of merit and the providers/respondents receiving the highest score are awarded grant funds to deliver employment and training services to eligible youth.

31. The following describes the limitations placed on ITAs, such as the dollar amount and/or duration:

Workforce Connections has not established a dollar limitation for individual training accounts (ITA); however, Workforce Connections does encourage occupational training services not to exceed a period of 12 months.

32. The following describes how performance information will be gathered and reported;

- a. Workforce Connections requires all service providers (who have been awarded WIA Title I funds to provide client services), to use its central database, i.e., NV Trac. Workforce Connections' NV Trac system contains all the required data elements to address local, state, and federal programmatic reporting requirements, including performance information. Workforce Connections develops monthly reports that delineate programmatic and financial performance by service provider. These reports are distributed to the service providers and Workforce Connections board members.
- b. Workforce Connections Board of Directors review and evaluate the reports to ensure proper accountability and oversight measures are in place for federal, state, and local compliance requirements. Workforce Connections' NV Trac system also interfaces with the Department of Employment, Training, and Rehabilitation (DETR) Nevada

JobConnect Operating System (NJCOS). Workforce Connections NV Trac system contains all necessary programmatic reporting requirements, including performance information for all WIA partners, promoting seamless service delivery.

33. The following describes common data systems in place to track progress;

- a. As previously indicated, Workforce Connections requires all of its contracted/funded service providers (who have been awarded WIA Title I funds to provide client services), to use its centralized NV Trac system. Workforce Connections' NV Trac system contains all the required data elements to address local, state, and federal programmatic reporting requirements, including performance information. Workforce Connections' staff develops monthly reports that delineate programmatic and financial performance by service provider. These reports are distributed to the service providers and Workforce Connections Board of Directors.
- b. Workforce Connections Board of Directors review and evaluate the reports to ensure proper accountability and oversight of established performance measures are in place to satisfy federal, state, and local compliance requirements. Workforce Connections' NV Trac system also interfaces with the Department of Employment, Training, and Rehabilitation (DETR) Nevada JobConnect Operating System (NJCOS). Workforce Connections' NV Trac system contains all necessary programmatic reporting requirements, including performance information for all WIA partners, promoting seamless service delivery.

34. The following describes how customer satisfaction information will be collected;

Workforce Connections encourages its service providers to capture customer satisfaction through a variety of methods, not limited to suggestion boxes, comment cards, telephone surveys and point of service surveys. Workforce Connections' staff coordinates with the state entity to provide required data necessary for the state to complete the Department of Labor mandated customer satisfaction.

- 35. The following describes the financial control and fund activity procedures to assure proper dispersal of, and accounting for federal funds in accordance with GAAP applicable in Nevada at the local level. Financial controls are established as outlined in the following Workforce Connections policies and its internal fiscal management procedures:
 - a. Cost Classification and Allocation—Policy 2.1
 - b. Procurement—Policy 2.2
 - c. Contract/Proposal Modification—Policy 2.3
 - d. Financial and Fiscal Reporting-Policy 2.4
 - e. Property Management—Policy 2.5
 - f. Youth Services Invoicing—Policy 2.6
 - g. Adult/Dislocated Worker Services Invoicing—Policy 2.7

- h. Cash Management—Policy 2.8
- i. Contractor Budget Modification—Policy 2.9
- j. Program Income—Policy 2.11
- k. Audit Process/Debt Resolution—Policy 2.12
- 1. Allowable Costs—Policy 2.13
- m. Subrecipient Program Funds Carry Forward Process—Policy 2.14
- n. Debt Management—Policy 2.15
- o. Workforce Connections Internal Fiscal Management Procedures, Dated February 2011; Revision in Process with Estimated Completion Date of June 30, 2012.
- 36. The following describes how fiscal control and accounting procedures, including those of subrecipients, will be sufficient to provide information pertaining to sub-grant and contract awards, obligations, unobligated balance, assets, expenditures and income;

In addition to Federal and State regulations and policies, Workforce Connections policies outline the requirement for subrecipients/service providers to follow. Through monthly financial status reports, reimbursement invoices, approved budgets, and costs allocation plans, Workforce Connections financial staff will verify, validate and document its financial activities as well as those of its subrecipients.

- 37. The following describes how fiscal control and accounting procedures, including those of subrecipient, will be sufficient to provide effective internal control to safeguard assets and insure their proper use;
 - a. Through annual independent audits required for Workforce Connections and its subrecipients, and monitoring of internal financial controls and procedures, sound safeguards have been established to ensure proper utilization of awarded funds and resources.
 - b. Also, through frequent financial desk reviews of contracted service providers' are conducted daily, and on-site fiscal monitoring reviews at least annually; Accounting procedures and fiscal controls will be thoroughly checked with the results reported to Workforce Connections' Budget Committee.
- 38. The following describes how fiscal control and accounting procedures, including those of subrecipient, will be sufficient to allow comparison of actual expenditures with budgeted amounts for each subgrant;

- a. Workforce Connections' financial department develops monthly financial reports/statements that reflect actual expenditures in comparison to budgeted amounts. Such reports are reviewed by Workforce Connections' Board of Directors and its budget committee during its formal public committee and board meetings.
 - b. Subrecipients/services providers' monthly financial reports are reviewed by Workforce Connections' financial department and compared with their approved budgets.
- 39. The following describes how fiscal control and accounting procedures, including those of subrecipient, will be sufficient to provide source documentation to support accounting records;
 - a. As outlined in Workforce Connections' policies, reimbursement invoices, payment vouchers, receipts, along with other supporting documents (back-up information), and comprehensive reimbursement data and information are required for payment approval and funds disbursement.
 - b. All financial records along with supporting documents are maintained for at least three years from the date of last activity, financial transaction or questionable costs determination.
- 40. The following describes how fiscal control and accounting procedures, including those of subrecipient, will be sufficient to allow proper charging of costs and cost allocation;
 - a. Workforce Connections' reimbursement invoices/vouchers are designed to identify appropriate costs allocated among programs.
 - b. All invoices/vouchers request for reimbursement payments are reviewed and verified for proper program costs allocation prior to approval for payment and funds disbursement.
- 41. The following describes how fiscal control and accounting procedures, including those of subrecipient, will be sufficient to permit preparation of required reports;

Workforce Connections financial records are organized and maintained to allow for prompt access and data collection for reporting purposes. For example, bank reconciliations and financial trial balances are reviewed at least monthly against source documents and reports are prepared using the extracted data/information.

42. The following describes how fiscal control and accounting procedures, including those of subrecipient, will be sufficient to trace transfer of funds to be at the level of expenditure adequate to establish that funds have not been used in violation of the restrictions on use of funds;

- a. As previously indicated, Workforce Connections' financial records are organized and maintained to allow for prompt access and data collection for reporting purposes. Documentation of funds transfers and contracts and amendments, and budgets require revision when necessary to match awarded contracts.
- b. Along with budget adjustments, revisions of contract statements of work are also required to justify expenditures in accordance with compliance requirements.
- 43. The following describes how fiscal control and accounting procedures, including those of subrecipient, will be sufficient to permit transfer of program income, potential stand in costs and other funds that are allowable;
 - a. Workforce Connections' policies require program income and stand-in costs and other allowable funds/resources to be reported monthly in financial status reports. Contracted service providers must provide Workforce Connections monthly financial status reports no later than the 15th day of each month following the end of each quarter.
 - b. Workforce Connections' financial department tests and monitor's service providers' financial data and records to ensure proper reporting of accrual funds, program income and potential stand-in costs.
- 44. The following describes the oversight role and responsibilities of Workforce Connections, including technical assistance as necessary and appropriate, in monitoring its own WIA activities and those of its subrecipients;
 - a. Workforce Connections has developed policies and procedures, and assigned its staff members fixed responsibilities and accountability for the monitoring and oversight of all WIA programmatic and fiscal activities.
 - b. Using Workforce Connections' programmatic and fiscal monitoring review plan, its staff shall schedule on-site monitoring reviews with all its subrecipients at least annually. During monitoring reviews, Workforce Connections' staff will check and test subrecipients' programmatic and financial activities and services to ensure they comply with WIA and all related regulations and policies.
 - (1) Upon completion of on-site monitoring reviews, reports of findings, recommendations, suggestions and corrective action will be documented to show each subrecipient's performance and capacity to follow compliance guidance and directives.
 - (2) Programmatic activities and services shall be tested and verified to determine that allowable expenditures have been made against appropriate cost categories and within the cost limitations specified in WIA and applicable regulations and policies.

(3) Desk and on-site monitoring reviews shall be conducted on a regular basis to determine whether or not subrecipients are complying with provisions outlined in WIA and all applicable laws and regulations.

L. Cost Allocation Plan

1. The following outlines Workforce Connections Cost Allocation Plan:

- a. The purpose of the cost allocation plan (CAP) is to allocate the agency's costs and record such costs in the expense ledger on an equitable basis across to all grants awarded, with all partners and/or programs sharing in cost of the operation of Workforce Connections.
 - (1) Workforce Connections Board of Directors have elected to limit its staff operating costs to 10%. Limiting operating costs at 10% ensures at least 80% of all Workforce Investment Act formula dollars are targeted for direct clients' services. The 10% programmatic allocation along with statutory 10% administrative limitation will allow Workforce Connections the flexibility to promptly coordinate and execute critical employment and training initiatives to meet southern Nevada's demand-driven workforce needs.
 - (2) A bi-weekly time system that identifies actual hours worked by staff on various activities.
 - (2) A monthly time review that distributes direct and indirect staff hours, i.e., administrative programmatic, to final time objectives (activities by grant) and calculates the proportional relationship among the grant objectives. These percentage allocations are used to allocate salary costs.
 - (4) A chart of accounts and an expense recording system that allow for direct and indirect costs to be recorded at the time of payment or when incurred. The costs are allocated to the final cost objectives (grant, cost category, partner agency) based on the following allocation methods.
 - (a) Direct Costs: All direct cost chargeable to a final cost objective (grant, cost category, partner agency) must be supported by appropriate time distribution records for personnel costs or appropriate source documentation for non-personnel costs. The supporting documentation must show that the direct cost has a specific relationship to the final cost objective.
 - (b) Indirect Costs: Indirect costs have no specific relationship to a particular final cost objective and, accordingly must be allocated. Workforce Connections charges various salary and operational costs to non-final cost objectives (temporary funds) to the final cost objectives (grant, cost category, partner agency) they benefit. The allocation is based on appropriate methods that are fair, reasonable and equitable.

b. Allocation of Indirect Costs:

- (1) Indirect costs are those that are charged in the expense ledger to various non-final cost objectives, called temporary funds, pending allocation to the final cost objectives. The temporary funds charged are determined by the nature of the cost. The following are the allocation methods used to allocate indirect costs.
 - (a) Salary: The monthly staff time analysis calculates the percentages to be used in charging costs to the final cost objectives (grant and cost category). Direct labor hours are recorded under the appropriate final time objectives (activities by grant) and the labor percentages are calculated per final time objective. Labor percentages are calculated for all final time objectives as a group, as well as separately for program final time objectives, and separately for administration final time objectives, as well as individually by employee.
 - (b) Individual labor percentages are used to distribute individual salary expense to the final cost objectives and to indirect salary expense, which in turn is allocated to the final cost objective by applying the specific program labor percentage or the administration labor percentage.
 - (c) General Indirect Costs: Allocated by labor percentages—the amount of expense in general indirect cost is allocated to the benefiting grants by applying the labor percentages or hours contributed (worked) to the program.
 - (d) Facility Costs: Allocated by space usage/number of assigned staff members/labor percentages—Costs identified as related to the physical occupancy of office space, including all Nevada JobConnect One-Stop Center, are gathered in these temporary funds, which include staff salary costs.
 - i. First, pre-determined proportions are periodically calculated for the following categories:
 - (I) Grant specific space: Calculating the amount, and proportion, of Workforce Connections' space used for activities directly traceable to a specific grant.
 - (II) Administration space: Calculating the amount, and proportion, of Workforce Connections' space used for activities that are classified as administration under the grants.
 - (III) Program space: Calculating the amount, and proportion, of Workforce Connections' space used for activities that are classified as program under the grants.
 - (IV) One-Stop Center Space: Calculating the amount, and proportion, of non-Workforce Connections space used for activities such as One-Stop partners.

- (V) Telephone extensions: Calculating the number, and proportion, of extensions used for each category, grant specific, administration, program, and One-Stop Center partners.
- ii. Second, costs are allocated into categories by applying the proportions determined by the periodic measurement and calculation of the space usage and the number of telephone extensions. The expense attributable to a specific grant or agency is recorded as such.
- iii. Third, the amount determined allocable to administration is charged to the temporary administration costs and consequently allocated to the administration cost category of the benefiting grants based on the formula used for the funds.
- iv. Fourth, the amount determined allocable to the program category is distributed among the benefiting grants using the program labor percentages.
- v. Fifth, the amount determined allocable to non-Workforce Connections, such as One-Stop System partner agencies, is charged to accounts specific to each partner agency.
- c. Indirect administration costs: Allocated by administration labor percentages—the monthly personnel time analysis includes percentages based on the proportion of staff hours charged to the administration final time objectives. The amount of costs is allocated to the benefiting grants using these percentages.
- d. Indirect program costs: Allocated by related program labor percentages—the monthly staff time analysis includes percentages based on the proportion of staff hours charged to the program final time objectives. The amount of costs is allocated to the benefiting grants using these percentages.
- e. Fringe benefit costs: Allocated by labor percentages—the monthly staff time analysis includes percentages based on the proportion of staff hours charged to final time objectives (activities by grant). The amount of costs is allocated to the benefiting grants using these percentages.

2. Calculation of Labor Percentages and Allocation of Salary Costs:

- a. Time objectives: Time objectives are used in recording hours on timesheets and the time analysis worksheets. A time objective is represented by activity, and if identifiable; grant codes. The codes allow for the identification of hours charged by Workforce Connections' staff based on activities performed. The activities are correlated to the corresponding cost categories under each grant.
 - (1) Non-final time objective: Defined as identifiable activities that benefit several grants. Hours incurred by Workforce Connections' staff in activities that benefit several grants are charged to non-final time objectives on timesheets. Hours charged to non-final time objectives are accumulated in the

time analysis and allocated to final time objectives based on the proportion of hours directly charged to final time objectives.

(2) Final time objective: Defined as an identifiable activity benefiting a specific grant. Hours incurred by Workforce Connections staff in activities that benefit specific grants are charged to final time objectives (activities by grant).

3. Time distribution records: Workforce Connections time distribution system includes the following:

- a. A timesheet accounting for the total hours that each employee worked.
- b. The timesheet serves as a system to summarize employees' time and attendance, showing a comprehensive view of the activities of each employee.
- c. Timesheet entries are prepared on a weekly basis.
- d. Timesheets are signed by the employee and a supervisor and/or the executive director or designated staff members with signature authorization who has knowledge of the activities performed by the employee.
- e. Where an employee performs a single activity that can be chargeable to more than one cost objective, the time distribution of the employee's activities may be split between benefiting cost objectives based on an equitable distribution method.
- f. Distributions based on budgeted estimates of employee activities shall not be used.

4. Time Analysis and Distribution: Workforce Connections shall utilize the following time analysis and distribution system:

- a. This process will produce two sets of percentages:
 - (1) Individual labor hour percentages for the distribution of individual salary cost to final cost objectives, and
 - (2) Collective labor hour percentage for the distribution of indirect costs.
- b. The monthly personnel time analysis calculates the percentages to be used in charging costs to the final cost objectives (grant and cost category). Direct labor hours are recorded under the appropriate final time objectives (activities by grant) and the labor percentages are calculated per final time objective. Labor percentages are calculated for final time objectives as a group, as well as separately for program final time objectives, and separately for administration final time objectives, as well as individually by employee.
- c. Individual labor percentages are used to distribute individual salary expense to the final cost objectives and to indirect salary expense, which in turn is allocated

to the final cost objective by applying the specific program labor percentage or the administration labor percentage.

- d. The labor percentages, program labor percentages, and the administration labor percentages are used to distribute non-salary expense to the appropriate final cost objective.
 - (1) The hours chargeable to final time objectives are distributed as recorded on the timesheets.
 - (2) The hours charged to non-final time objectives (program and administration pools) are allocated to the corresponding final time objectives (program or administration activities by grant) based on the following methods:
 - (a) Pooled (indirect) program hours are distributed based on the proportionate number of direct labor hours charged to the program final time objectives.
 - (b) Pooled (indirect) administrative hours are distributed after the direct program hours have been distributed to the grants, and the direct administration hours have been distributed to the grants. The pooled administrative hours are distributed based on the proportionate number of direct program hours, plus direct administration hours charged to the program and administration final time objectives.
- e. Distribution of Salary Costs: Salary costs are charged to final cost objective by applying individual staff percentages to individual salary costs, after the time analysis is completed.

14. SECOND PUBLIC COMMENT SESSION:

Members of the public may now comment on any matter or topic, which is relevant to or within the authority or jurisdiction of the Board. You may comment now even if you commented earlier, however, please do not simply repeat the same comment you previously made. Please clearly state and spell your name and state your address for the record. Each comment will be limited to three (3) minutes