

# THREE RIVERS WORKFORCE DEVELOPMENT BOARD

## LOCAL PLAN

Program Year 2020 – Program Year 2024

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## **Acknowledgements**

The Three Rivers Workforce Development Board appreciates the participation of its mandatory partners, board members, workforce development staff, economic development professionals, Chamber of Commerce leaders, elected officials, educational institutions, supportive/social service agency partners, and community members in the development of this plan.

## Strategic Elements, Governance and Structure

- 1. Identification of the Fiscal Agent** – Provide an identification of the entity responsible for the disbursement of grant funds described in WIOA § 107(d)(12)(B)(i)(III) as determined by the chief elected official.

The Three Rivers Regional Commission acts as the fiscal agent for the Three Rivers Workforce Development Board (TRWDB). The Three Rivers Regional Commission is responsible for grant management, budgeting, and fiscal compliance.

Three Rivers Regional Commission  
120 North Hill Street  
Griffin, GA 30224  
(678) 692-0510

Executive Director: Kirk Fjelstul  
Workforce Development Director: Stephanie D. Glenn

- 2. Description of Strategic Planning Elements** – Provide a description of the strategic planning elements listed below. A complete answer will rely on a variety of data sources and employer input. Also describe how the information was gathered and what partners and employers were consulted.
  - a. Provide an analysis of the regional economic conditions including existing and emerging in-demand industry sectors and occupations, and the employment needs of employers in those industry sectors and occupations. Include the listing of occupations in demand within the region and describe how the list was developed citing source data.**

The 10-county region that encompasses Three Rivers is economically and geographically diverse. The region encompasses three interstates, several population centers, and is adjacent to a large metropolitan area. The area's economy is relatively diverse and includes several major industries including manufacturing, health care, and logistics. Table 1 shows the Three Rivers Region's 5 year industry trends. The largest percentage growth sub clusters are in manufacturing – automotive parts; construction; health care; entertainment, education: colleges and universities, and retail. The most specialized industries (based on their location quotient) when compared to the United States as a whole are manufacturing, utilities, and administrative and support and waste management and remediation services.

**Table 1. Industry Subcluster Employment Trend**

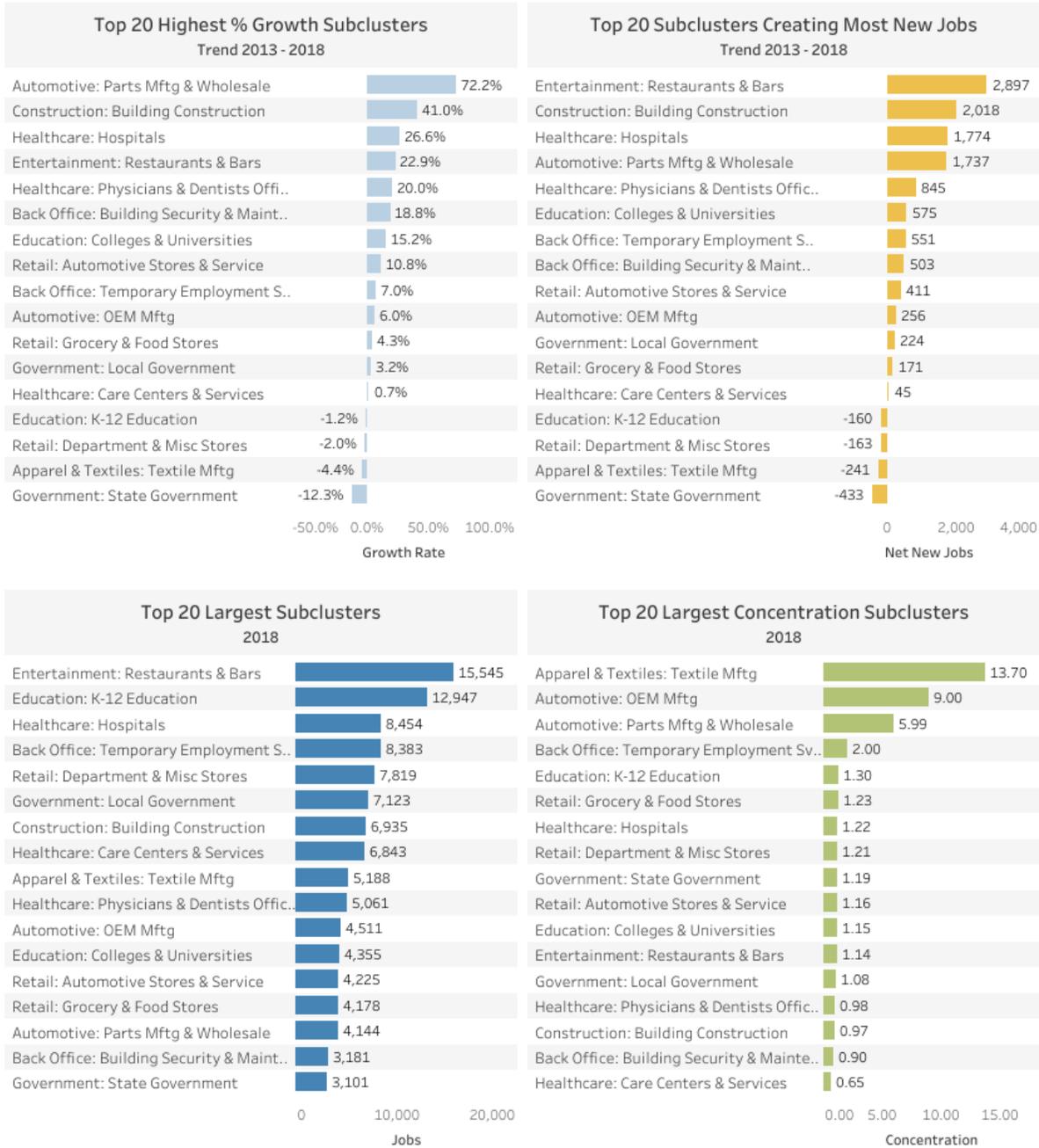
Show: 5-Year Trend

Geography: Three Rivers Region

Min. Job Share: 1.5%

\*Type the percent number and press enter.

**Industry Subcluster Employment Trend  
Three Rivers Region**

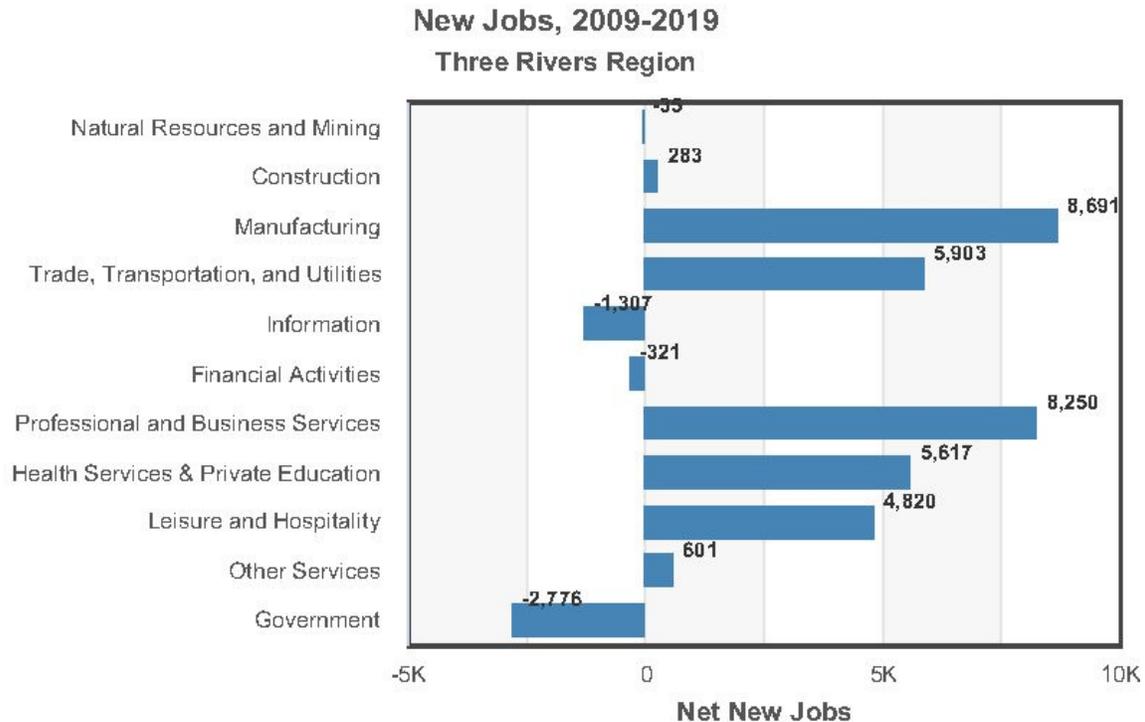


Note: Charts show subclusters with a minimum of 1.5% of the total jobs in the year 2018.

Source: Avalanche Consulting cluster calculations on data from EMSI.

The region has several industries that are seeing significant growth. Table 2 shows net new jobs by industry over the last 10 years. The manufacturing industry has consistently had a growth trend over the last 10 years. Automobile manufacturing has grown significantly in the region due to Kia’s operations in West Point. The region is also seeing large job gains in professional and business services, logistics, health care, and leisure and hospitality.

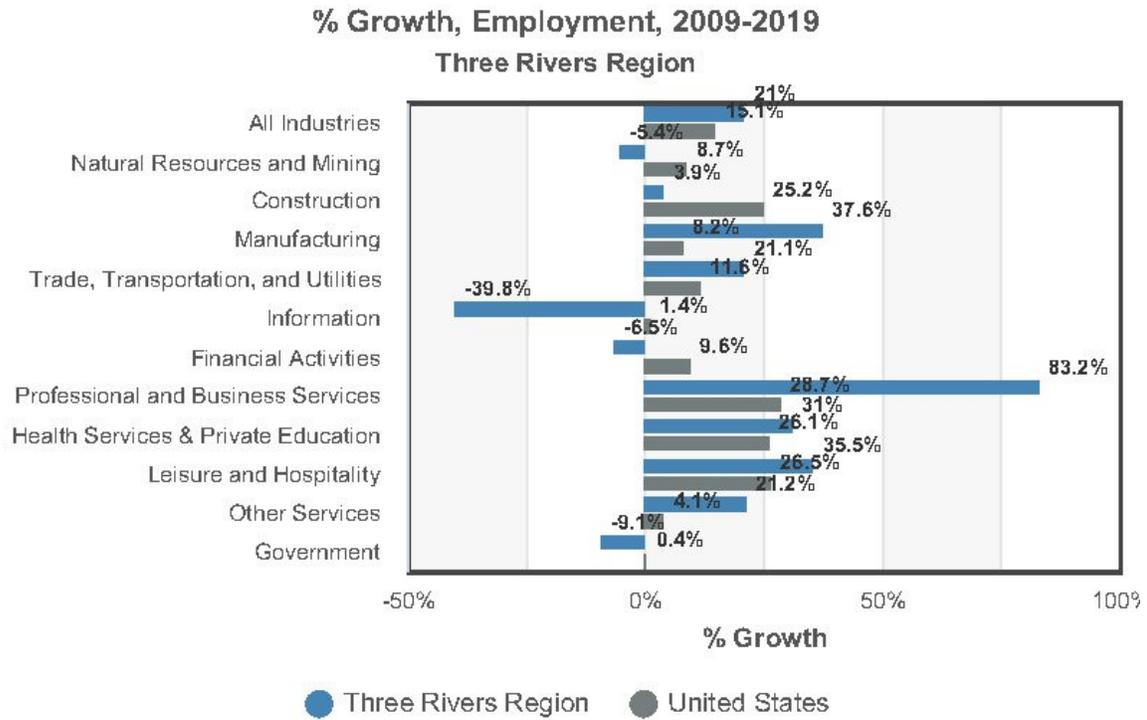
**Table 2. Net New Jobs, 2009-2019**



Source: BLS Quarterly Census of Employment and Wages (QCEW)

Another way to understand trends and the needs of regional employers is by analyzing the percent growth of an industry for the region. Table 3 shows the % growth of employment in the region’s sectors over the last ten years.

**Table 3. % Growth, Employment, 2009-2019**



Source: BLS Quarterly Census of Employment and Wages (QCEW)

The TRWDB’s first sector strategy developed was in the manufacturing industry. The strategy that is being developed during 2019-2021 is in the healthcare industry, and logistics will follow after 2021. There remains a need in manufacturing, and the region will continue to provide resources toward manufacturing to support development of training programs, and the hiring of individuals in the manufacturing industry.

The top in-demand healthcare occupations according to employment change and projections are displayed in Table 4.

**Table 4. In-Demand Healthcare Positions, Industry Projections (Long-term)**

**Industry Projections (Long-term) for Multiple Industries in West Central Georgia Local Workforce Development Area in 2016-2026**

**Industry Projections Table**

The table below shows the long term industry projections for Multiple Industries in West Central Georgia Local Workforce Development Area for the 2016-2026 projection period.

Industry	Industry Code	2016 Estimated Employment	2026 Projected Employment	Total 2016-2026 Employment Change	Annual Percent Change	Total Percent Change
Ambulatory Health Care Services	621	6,547	8,373	1,826	2.49%	27.89%
Health Care and Social Assistance	62	21,008	25,706	4,698	2.04%	22.36%
Hospitals	622	8,177	9,598	1,421	1.62%	17.38%
Nursing and Residential Care Facilities	623	2,931	3,396	465	1.48%	15.86%
Social Assistance	624	3,353	4,339	986	2.61%	29.41%

Source: Georgia Dept. of Labor, Workforce Statistics & Economic Research, Projections Unit  
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Table 5 presents the top in-demand occupations for the local area. The list was developed based on feedback collected from major industries during the plan development process, traditional labor market information, real-time labor market information, feedback from the Business and Industry leaders, and state guidance.

**Table 5. Three Rivers Workforce Development Board In-Demand Occupation List**

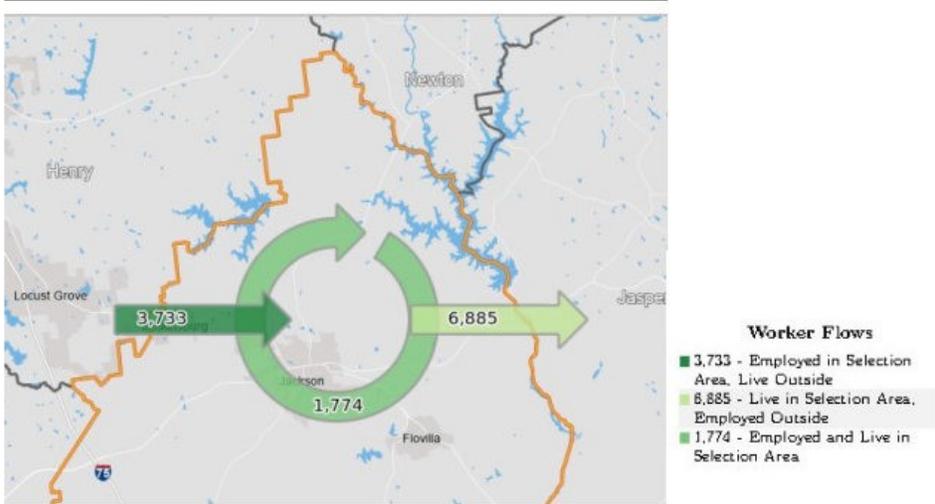
Occupation	
Assembly Supervisor	Maintenance and Repair Worker
Automotive Service Technician and Mechanic	Maintenance Technician
Aviation Mechanic	Network Specialist
CNC Operator	Pharmacy Technician
Customer Service Representative	Registered Nurse
Diesel Mechanic	Software Developer
Forklift Operator/Warehouse Worker	Team Assembler/Manufacturing Associate
Licensed Practical Nurse	Truck Driver
Machinist	Welder

The region has significant commuting activity both within and outside of the region: Commuting data demonstrates the need to work cooperatively throughout the region and with other neighboring regions (e.g., Atlanta, Middle Georgia, River Valley). Figure 2 on the next page shows the inflow and outflow commuting patterns for each county in the region. Using the maps in figure 2 we can see that 1,774 residents in Butts County live and work within the county. We can also see that 6,885 residents live in Butts County, but commute outside of the county to work.

**Figure 2. Three Rivers Region Commuting Patterns Inflow/Outflow**

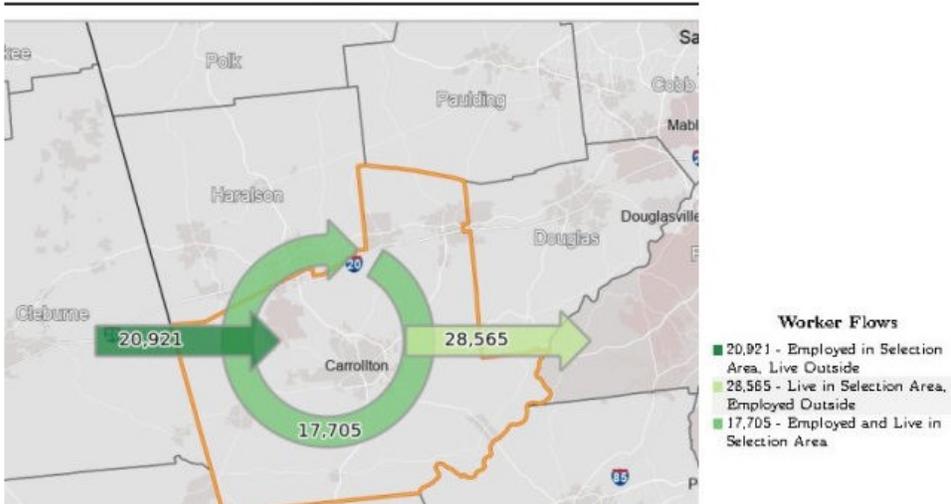
**Butts County**

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017  
All Workers



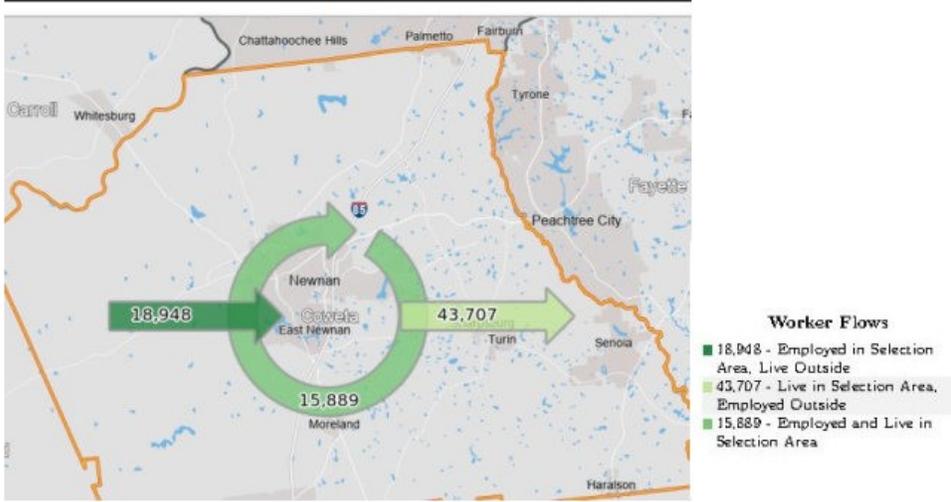
**Carroll County**

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017  
All Workers



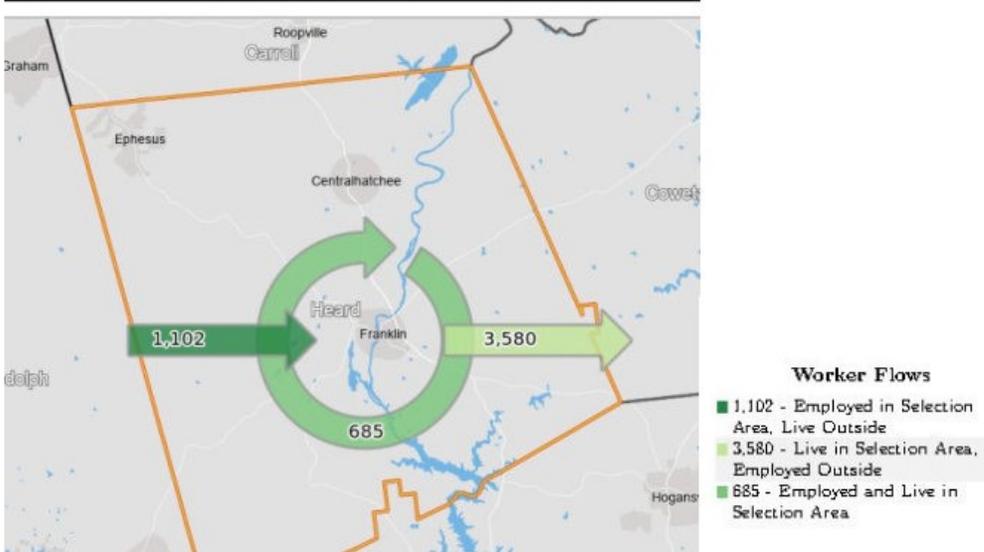
**Coweta County**

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017  
All Workers



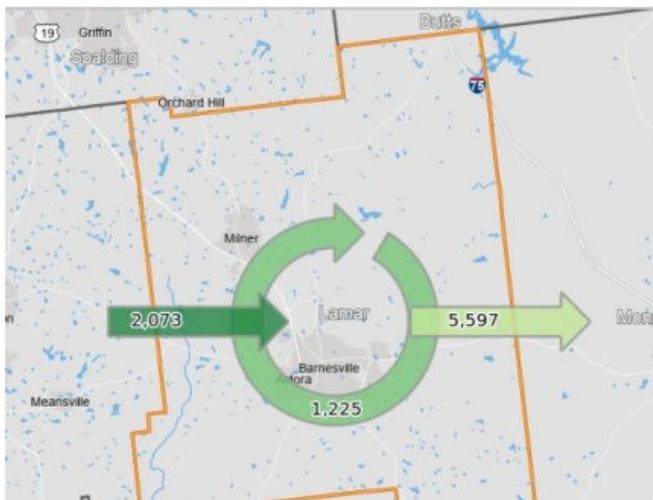
**Heard County**

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017  
All Workers



**Lamar County**

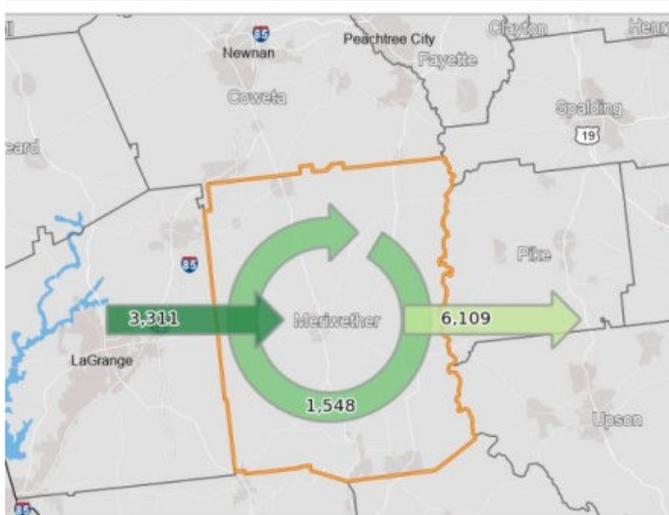
**Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017**  
All Workers



- Worker Flows**
- 2,073 - Employed in Selection Area, Live Outside
  - 5,597 - Live in Selection Area, Employed Outside
  - 1,225 - Employed and Live in Selection Area

**Meriwether County**

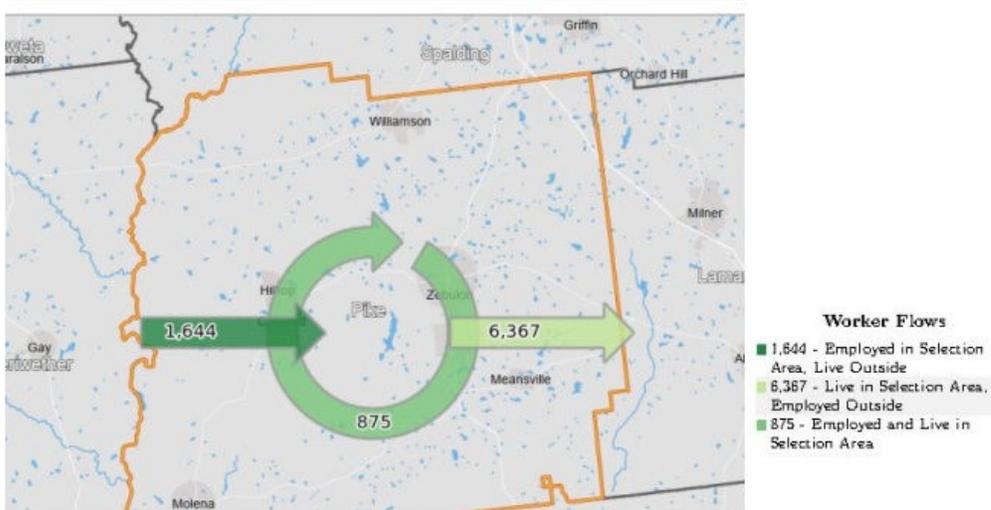
**Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017**  
All Workers



- Worker Flows**
- 3,311 - Employed in Selection Area, Live Outside
  - 6,109 - Live in Selection Area, Employed Outside
  - 1,548 - Employed and Live in Selection Area

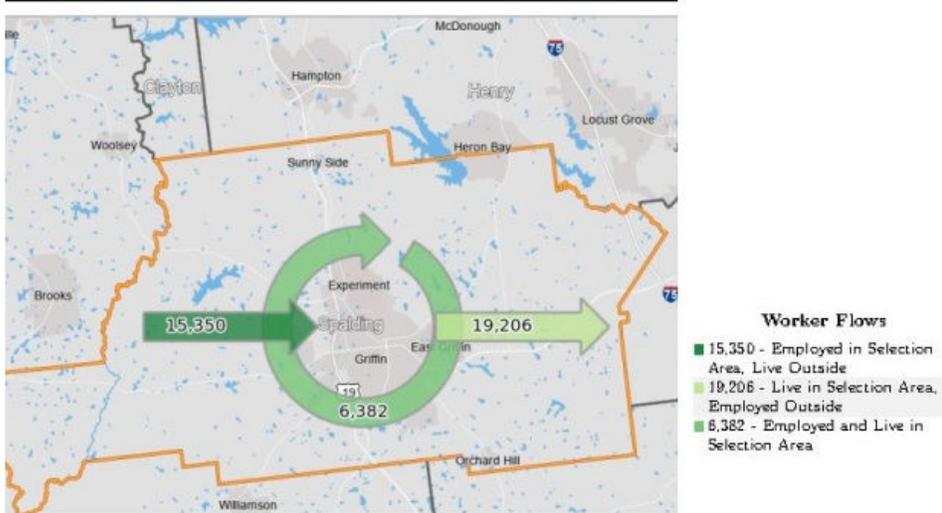
**Pike County**

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017  
All Workers



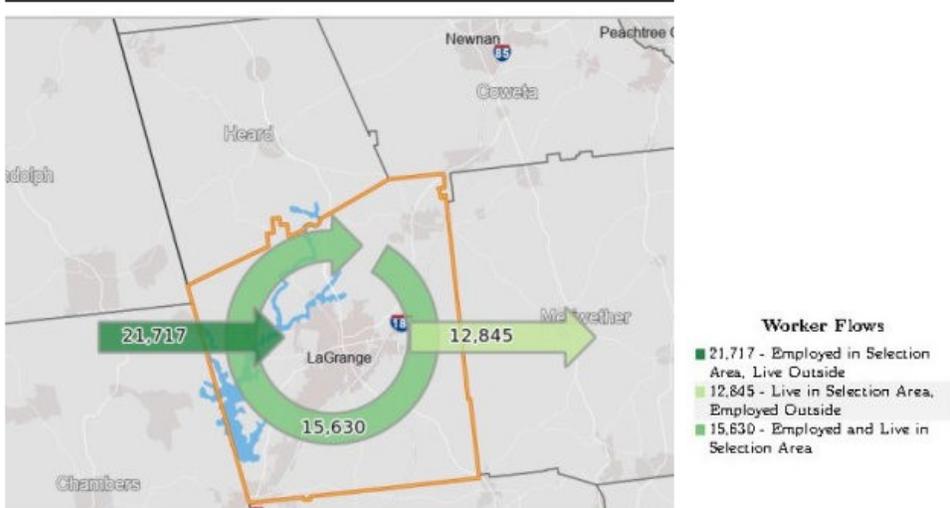
**Spalding County**

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017  
All Workers



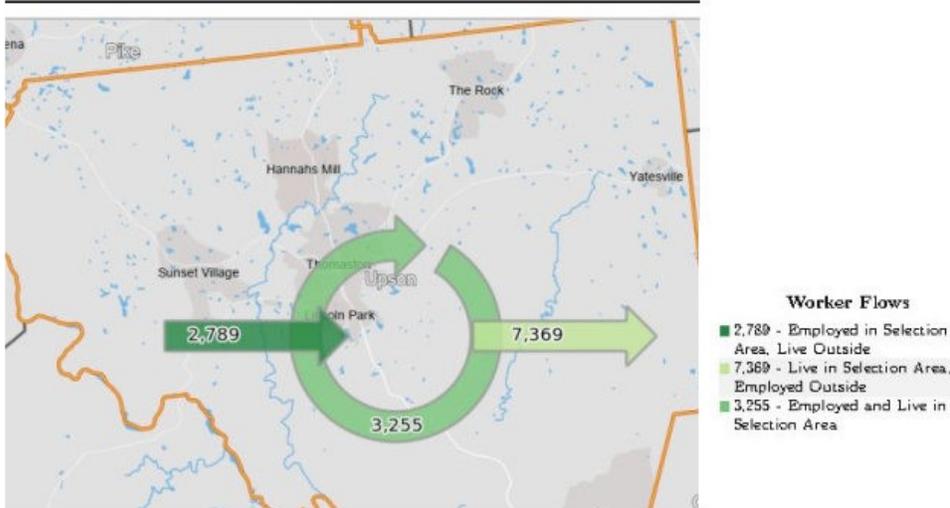
**Troup County**

Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017  
All Workers



**Upson County**

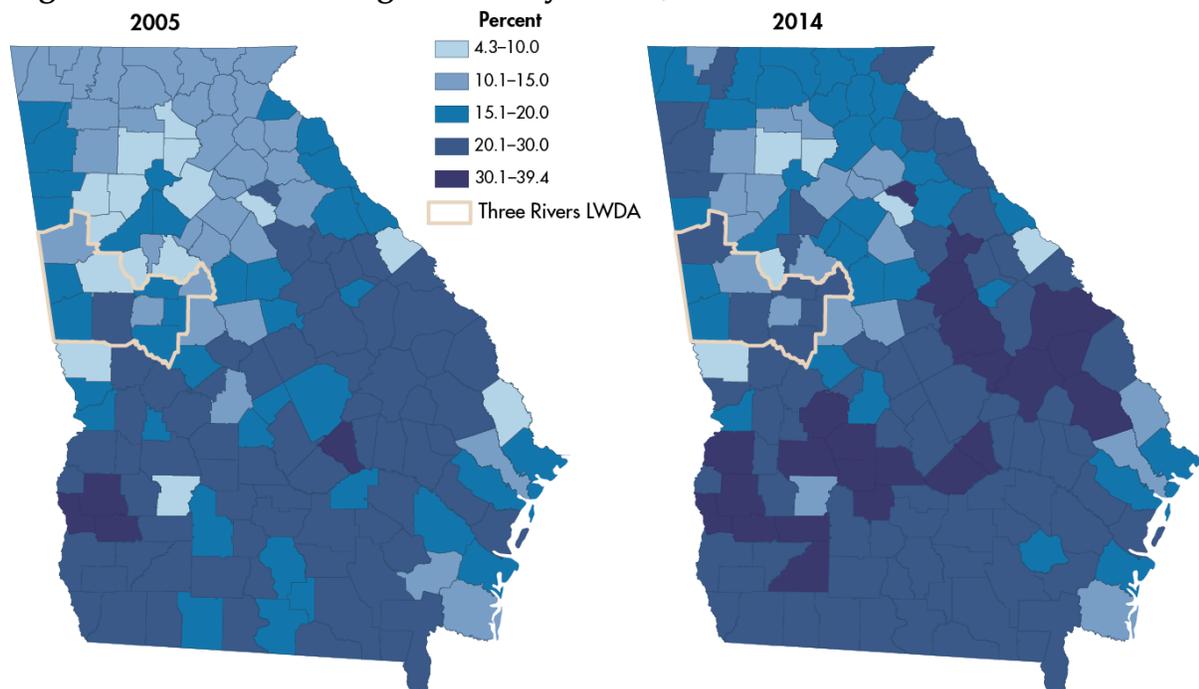
Inflow/Outflow Counts of Primary Jobs for Selection Area in 2017  
All Workers



Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2017).

As part of analyzing the workforce development needs in the region, it is important to understand the current economic condition of its subparts. Figure 4 shows the poverty levels in 2005 and 2014. The economic condition of the region largely mirrors that of the state. Figure 4 shows that there is some diversity and growing levels of poverty in the region.

**Figure 4. Three Rivers Region Poverty Levels, 2005 and 2014**



Source: U.S. Census Bureau American Community Survey, Carl Vinson Institute of Government

- b. Provide an analysis of the knowledge and skills needed to meet the employment needs of the employers in the region, including employment needs in in-demand industry sectors and occupations.**

The TRWDB analyzed the skills and knowledge necessary to meet the employment needs of industries in the region by conducting listening sessions with three key industry sectors, analyzing job postings, and reviewing data provided in the local area's first sector partnership efforts in the area of manufacturing.

The largest knowledge and skill deficit in the region is soft skills, which encompasses behaviors like showing up to work on time, getting along with co-workers, following directions, adhering to company rules, teamwork, critical thinking, time management, ethics, and basic etiquette/respect. Companies also highlighted the difficulty of hiring employees who can pass a drug test; many companies shared that many candidates will either lose interest in the job when a drug test is mentioned or fail to attend the drug test screening. Human resource and plant managers in manufacturing stated that if they could find individuals with basic soft skills they would handle the rest of the hard skills training. The industry sector listening sessions and a review of online job posting data makes it clear that a “one-size fits all” service delivery strategy will not work in this diverse region.

A comprehensive picture of the skills and knowledge desired by local employers can be gained by analyzing core competencies listed in job ads. Most online job ads in the region list the required soft skills, hard (technical) skills, and any applicable certifications or licenses. Tables 6, 7 and 8 on the following pages show the top soft skills, hard skills, and certifications/licenses listed in online job ads posted in the TRWDB region.

**Table 6. Job Posting Analytics: Top 10 Soft Skills, 2015-2016**

Skill	Postings with Skill
Scheduling (Project Management)	46,855
Leadership	17,095
Learning	9,791
Coordinating	8,407
Leading	7,970
Listening	6,089
Cleanliness	4,469
Ethics	3,490
Speech	3,325
Literacy	1,705

Source: Economic Modeling Specialists Inc.

**Table 7. Job Posting Analytics: Top 10 Hard Skills, 2015-2016**

Skill	Postings with Skill
Management	52,619
Training	47,778
Sales	40,673
Customer Service	39,559
Recruitment	39,436
Insurance	31,409
Retailing	30,808
Health Care	28,868
Arc Welding	27,857
Driving	27,671

Source: Economic Modeling Specialists Inc.

**Table 8. Job Posting Analytics, Top 10 Certifications/Licenses, 2015-2016**

Certification	Postings with Certification
Commercial Driver's License (CDL)	27,355
Registered Nurse	10,983
Licensed Practical Nurse	5,155
Nurse Practitioner	1,264
Certified Nursing Assistant	1,004
Patient Care Technician	887
Licensed Vocational Nurses	867
Board Certified	829
Certified Apartment Property Supervisor	707
Transportation Worker Identification Credential (TWIC) Card	694

Source: Economic Modeling Specialists Inc.

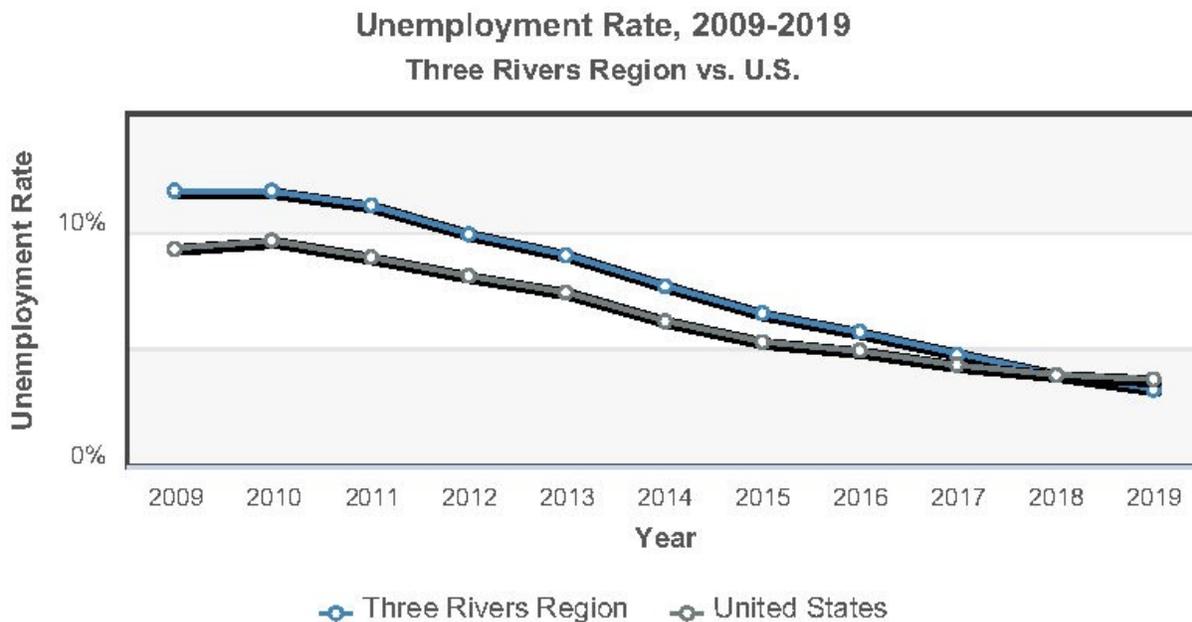
- c. **Provide an analysis of the workforce in the region, including current labor-force employment, unemployment data, information on labor market trends and the educational and skill levels of the workforce in the region, including individuals with barriers to employment. List all data sources used to gather this information.**

Labor Market Trends

The labor market in the Three Rivers region mirrored state and national trends over the past decade. Figure 5 on the next page shows the 10-year unemployment rate trend for the region. The low unemployment rate in 2019 (3.3%) indicated that the region had largely recovered from the recession. The region lost around 12,000 jobs during the recession in 2008, but has recovered those in the post-recession period. Employment projections based on trends show that the region will add around 20,000 jobs during the next 10 years. These projections are currently using data that has not factored in the pandemic currently being experienced by United States and countries in the world. The coronavirus has impacted the economy on so many levels, and the realization of what this pandemic will do to the economy in the future is unknown. Currently, the unemployment rate for the state of Georgia is 9.5%. The unemployment rate continues

to climb as individuals are unable to work, and lack resources to return to work safely while caring for loved ones and/or children who are learning via virtual classrooms.

Figure 5. Unemployment Rate Trend, 2009-2019

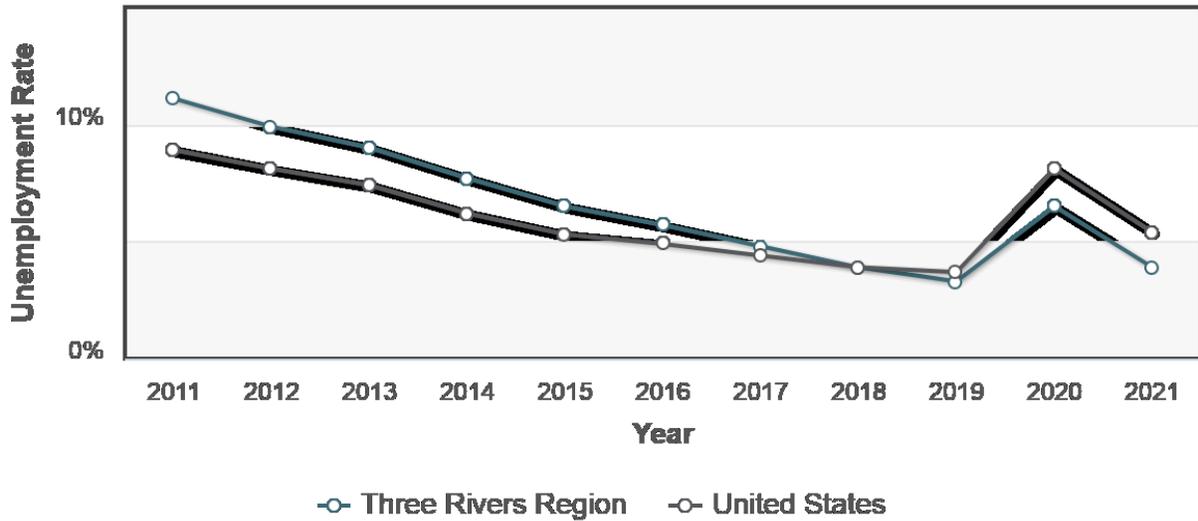


Source: BLS Local Area Unemployment Statistics (LAUS)

### Unemployment Rate Trend Update Post COVID-19

During the plan update in 2020, the unemployment rate had climbed to 9.5%. Currently, the state's unemployment rate is 2.8%. Though the region has seen an increase in resources available to assist individuals with obtaining employment. The region continues to suffer from a talent shortage. Similar to other regions and states in the U.S. Jobs continue to grow, but talent to fill positions is limited. There was a drastic shift in priorities and mindsets of individuals eligible to work in the state. This shift has resulted in employers using inventive strategies to motivate individuals to return to work. The same concerns and issues are experienced in the Three Rivers region.

### Unemployment Rate, 2011-2021 Three Rivers Region vs. U.S.

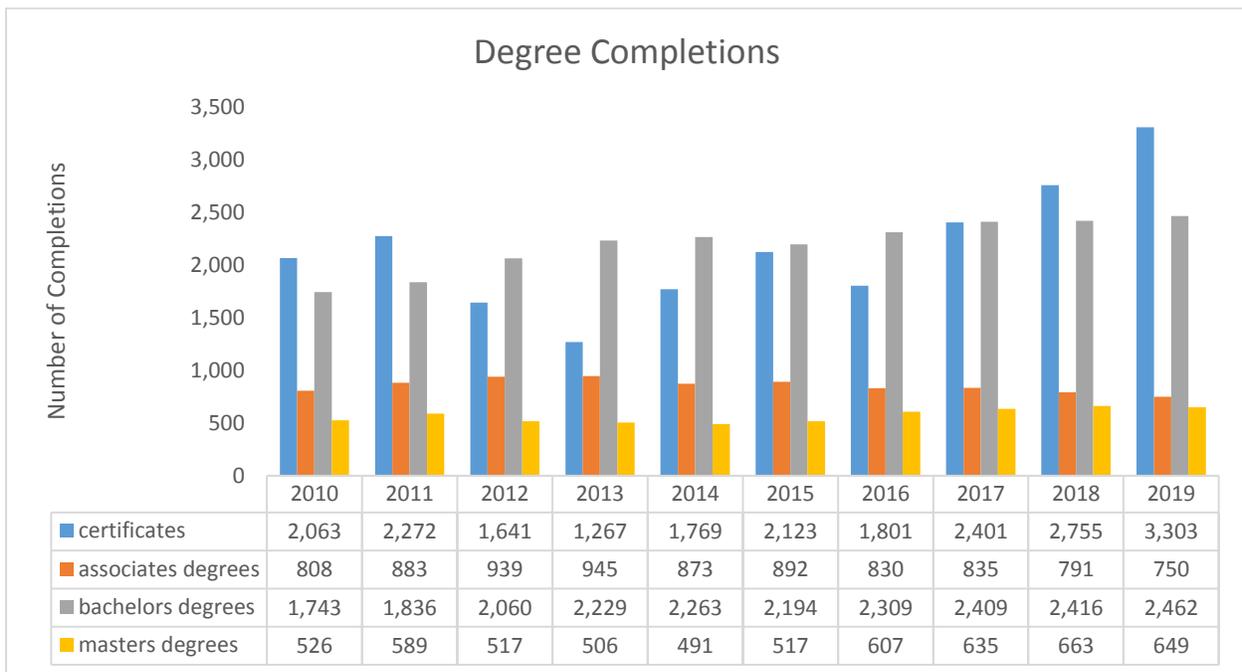


#### Educational Attainment

The local area has a diverse level of educational attainment. Figure 6 shows the region’s educational attainment level for the population age 25+. More than 50% of the region’s population age 25+ has a high school diploma or less. The previous plan’s data showed that only 6% of the region’s population had an associate’s degree and 19% had a bachelor’s degree or greater. Current data in Figure 6 indicates that 7% of the region’s population has an associate’s degree and 21% has a bachelor’s degree or greater. This shows that the region is increasing in higher skilled individuals to support jobs that may require additional skill sets. Job posting analytics and employer engagement demonstrate that more jobs are requiring advanced education. Many local companies indicated that their minimum education requirement is a high school diploma/GED. The data in Figure 7 demonstrates a need to continue up-skilling individuals through adult education and post-secondary education.

**Figure 6. Regional Educational Attainment Age 25+**

	Number	Percent
Less than high school	53,128	16%
High school graduate of equivalent	116,641	35%
some college	74,889	22%
Associates Degree	23,350	7%
Bachelor's Degree or higher	69,316	21%
Population 25 years and over	337,324	
American Community Survey 2018, 5-year estimates		



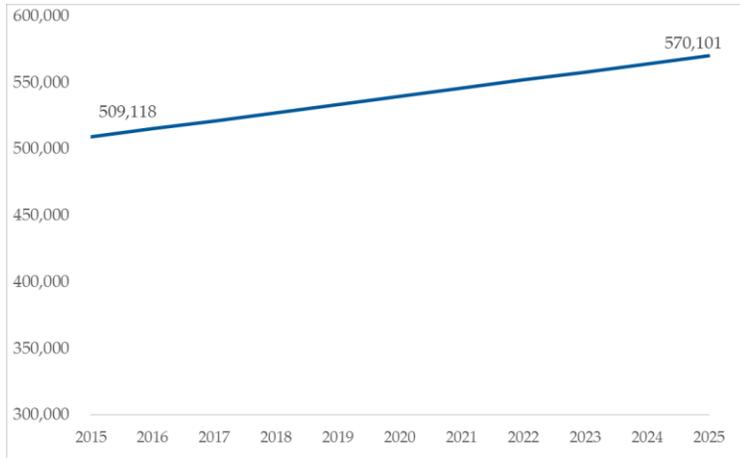
Source: EMSI

### Population Trends

The Three Rivers region is projected to add more than 60,000 residents during the next 10 years. Figure 8 shows the short-term population projections developed by the Governor’s Office of Planning and Budget for the TRWDB region. The local area is projected to see steady growth, but the pace of the growth varies at the county level. Table 9 on the next page shows the long-term population projections for each county in

the region. Seven counties are projected to see an increased population while the population in three counties is expected to decline over the next 30 years. The majority of long-term growth is expected to be in Coweta and Carroll counties.

**Figure 8. Three Rivers Region Short-Term Population Projections, 2015-2025**



Source: Governor’s Office of Planning and Budget (2015)

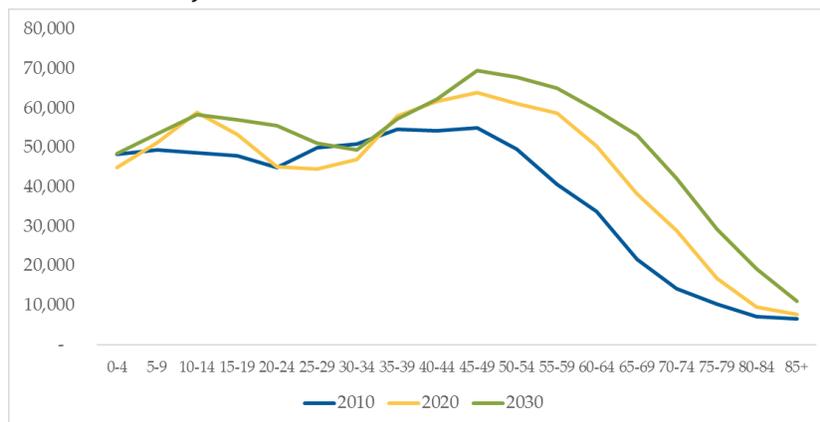
**Table 9. County Long-Term Population Projections, 2020-2050**

County	2020	2030	2040	2050	% Change 2020-2050
Butts	25,174	29,426	31,968	33,957	8,783
Carroll	120,119	133,363	145,151	156,752	36,633
Coweta	152,001	179,677	198,602	212,357	60,356
Heard	12,370	14,339	15,343	16,048	3,678
Lamar	19,347	21,228	23,110	25,219	5,872
Meriwether	21,020	20,895	20,467	19,983	(1,037)
Pike	18,860	20,147	21,335	22,276	3,416
Spalding	69,110	80,827	87,491	93,135	24,025
Troup	70,414	72,836	74,307	74,975	4,561
Upton	26,277	26,583	26,461	26,023	(254)
Georgia Office of Planning and Budget (2019 Series)					

Regional Age Structure

The age structure (that is, the number of people at various age levels) is expected to shift significantly over the next 20 years. This shift in age structure will have significant implications for workforce development and education in the region. Figure 9 shows the age structure projections developed by the Governor’s Office of Planning and Budget. The TRWDB region will continue to “gray” as the population ages. In 2010 there were 14,000 residents age 70-74, but projections show that in 2030 the region will have 42,000 residents age 70-74. The region will see some growth in the youth population but will see little growth in middle-age residents.

**Figure 9. Age Structure Projections, 2010-2030**

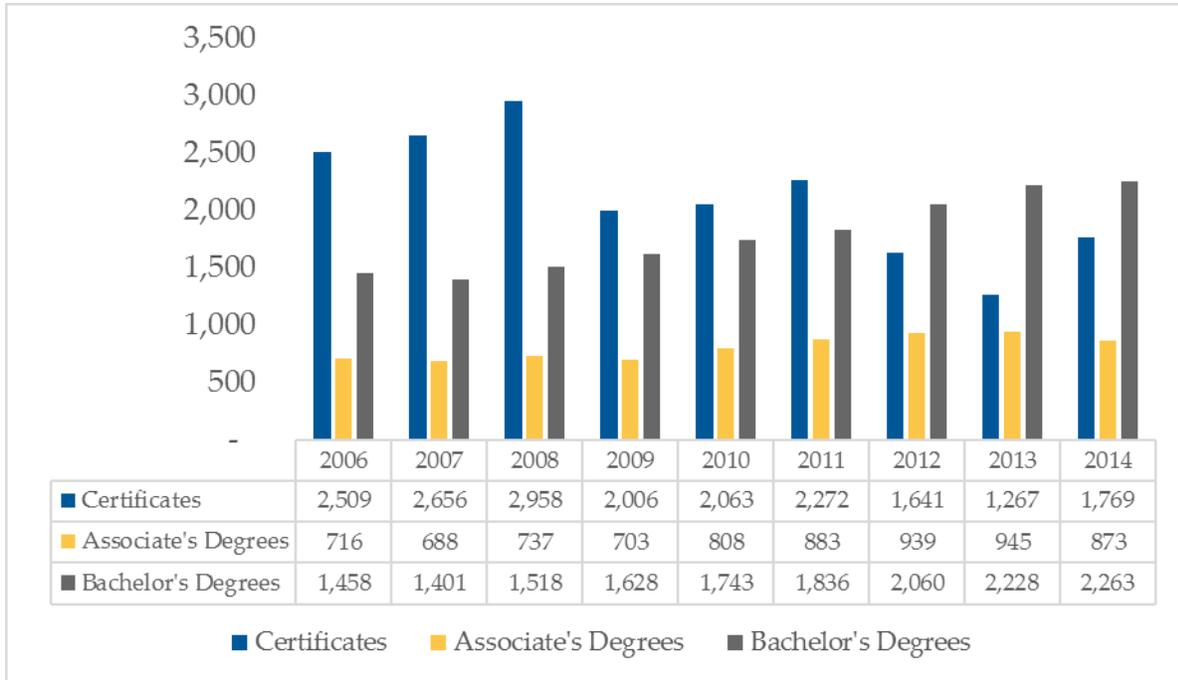


Source: Governor's Office of Planning and Budget (2012)

- d. **Provide an analysis of the workforce development activities (including education and training) in the region, including an analysis of the strengths, weaknesses and capacity of such services to address the identified education and skill needs of the workforce, and the employment needs of employers in the region.**

The TRWDB region has a strong and diverse workforce development activity network that includes two technical colleges, private training providers, two University System of Georgia institutions, several college and career academies, and career and technical education programs in every school district. Figure 10 shows the regional degree completion trends from 2006 to 2014. There has been a large reduction in the number of certificates issued, a slight uptick in the number of associate's degrees, and a large increase in bachelor's degrees awarded over the study period. These trends show the strength of the education and training network in the Three Rivers region, but also may indicate that degree production does not fully align with the job openings in the region. Most employers engaged with the planning process cited a need for technical skills that are typically taught in certificate programs.

**Figure 10. Degree Completion Trends, 2006-2014**



Source: Economic Modeling Specialists Inc.

- e. **Provide a description of the local board’s strategic vision and goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment), including goals relating to the performance accountability measures based on primary indicators of performance in order to support regional economic growth and economic self-sufficiency.**

**Vision: Employees with quality jobs and employers with qualified employees**

**Mission: The Three Rivers Workforce Development Board exists to support and promote workforce development and job development to meet the needs of employers and employees in the region.**

- Key Strategic Elements**
- 1) **Incorporate Soft Skills Development in all Programs**
  - 2) **Explore Innovation and Flexibility**
  - 3) **Partnership Building**
  - 4) **Serving Existing Employers**

The TRWDB aims to align its service offerings with economic development and key regional industries to ensure that employers have the talent they need and that individuals have the training and support they need to find employment with sustaining wages. The board will invest its program dollars into high-yield programs that prepare adult and youth clients with the essential skills, technical skills, and experience they need to succeed in the 21st-century workplace. The board will also leverage its role as a convener and connecting entity in the region to align programs, services, and resources among the many governmental and non-governmental entities involved in workforce development, education, and economic development. For example, TRWDB will use its convening capacity to bring together regional partners (e.g., community service board, law enforcement, education, health providers) in 2020 to discuss economic recovery during and post the COVID-19 pandemic. Many small businesses have presented concerns with retaining employees, and with continuing to

remain open to the public. Businesses have had to lay individuals off, and individuals have received unemployment plus a federal stipend of an additional \$600 a week with their unemployment. Majority of the businesses that are opening their doors have stated that some employees are not willing to come back for less pay, or they are unable to come back due to childcare issues.

The key factor to continued success and strong performance is building and strengthening relationships with employers throughout the region. The TRWDB needs to have a clear understanding of employers' workforce needs (e.g., soft skills, technical skills, work experience, the number of openings) so that it can link the services provided to gainful employment opportunities. The Business and Industry Committee, along with sector strategies and business services program, will serve as the "front door" connection to employers.

The board will also ensure that program offerings and service delivery strategies are in place to serve individuals with barriers to employment. This will be done through staff training, building stronger relationships with partner organizations (e.g., Georgia Vocational Rehabilitation Agency [GVRA], Family Connections, the Re-entry Coalition, Goodwill), and building stronger employer relationships. Career Facilitators (CFs) will work with the appropriate partner organizations and board resources to develop customized employment strategies and provide wraparound support services, as necessary.

Youth clients will be served with a similar strategy to individuals with barriers to employment. The TRWDB aims to prepare youth to enter the workforce, post-secondary education, or the military with the skills and experience necessary to be self-sufficient and on a career path rather than just simply getting a job. The board will serve youth clients with redesigned out-of-school youth contracts and programs that focus on teaching essential skills and technical skills related to the employment opportunities that exist in the region.

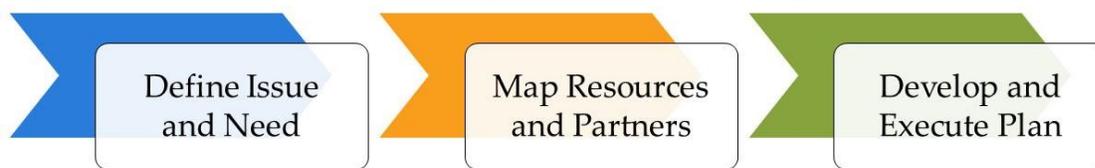
- f. **Taking into account the analyses described in sections “2. a-e” (above), provide a strategy to coordinate core programs to align resources available to the local area to achieve the strategic vision and goals.**

The TRWDB will coordinate core programs and resources using a three-step process to achieve the vision and mission articulated above. The board strongly believes that it can only accomplish its work by building effective partnerships with employers, governments, chambers of commerce, economic development organizations, and nonprofit partners.

The key strategy to addressing workforce and talent needs in the region is detailed in Figure 11. The first step will be to define the issue and identify the needs. Once a clear problem statement has been identified, board members and staff will identify Workforce Innovation and Opportunity Act (WIOA) and partner resources that can be used to address the issue. Finally, once the resources and partners have been mapped, the TRWDB will develop and execute a plan to resolve the need.

This three-step process can be applied to workforce needs and issues identified in the above questions or any issues that arise during the plan period. The strategies and plans that come out of this process will enable the local area to achieve its vision, goals, performance metrics, and ultimately better serve employees and employers.

**Figure 11. Three Rivers Three-Step Coordinated Strategy Process**



- 3. **Description of Strategies and Services – Provide a description of the strategies and services that will be used in the local area in order to accomplish the items listed below.**

a. **How will the area engage employers in workforce development programs, including small employers and employers in in-demand industry sectors and occupations?**

The key to engaging and serving employers in the Three Rivers region will be a reinvigorated business services strategy. The focus for the strategy includes: listening to employers; utilizing needs assessments and data to guide efforts; promoting and marketing business services (e.g., Incumbent Worker Training, On-the-Job Training [OJT], and other training services); and using sector strategies to provide a high-level of customized service to key industries.

The TRWDB's Business Services Manager, Business Services Coordinators, and Management Team will engage with the chambers of commerce and economic development organizations in the region to ensure that businesses, especially small businesses, are aware of business services and training programs. Partners throughout the local area work closely with businesses and can assist with providing referrals. The local area will work to educate partners about the services and abilities of the TRWDB. The local area will hold joint training events between partner organization staff and TRWDB staff to ensure strong and ongoing referrals and partnerships.

TRWDB will also work cooperatively with its partners in the local area to engage and meet the needs of employers. These partners include state government organizations such as GDOL, TCSG, GVRA, local economic development organizations, chambers of commerce, and elected officials. These organizations are on the front lines of serving employers in competitive industries and are most knowledgeable about the talent needs for these industries. TRWDB will partner with growing and in-demand industry sectors to serve as their talent source.

The TRWDB staff will also take advantage of opportunities to promote WIOA Services at local Employer Committee Meetings, Society for Human Resource Management (SHRM) meetings, as well as Rotary Club, Kiwanis, Unions, and any other opportunities as they become available.

According to the University of Georgia Small Business Development Center, 97.7% of all Georgia employers are small businesses.<sup>1</sup> As the region's leading workforce development and human resources support organization, the local area will utilize its resources, personnel, network, and services to support small businesses. The business services and program delivery staff will partner with chambers, local governments, economic development organizations, and downtown development authorities to identify small businesses that can benefit from TRWDB services. Additionally, the local area will develop materials to explain the benefits of available services to small businesses and train staff to develop appropriate solutions for these employers.

- b. How will the area support a local workforce development system that meets the needs of businesses in the local area? Discuss the area's workforce services to businesses and how business and organized labor representatives on the Local Workforce Development Board (LWDB) contributed to the development of these strategies. Provide a listing of business services available through the area(s) such as employer workshops and assessment and screening of potential employees.**

Alignment to the needs of the business community in the local area will be achieved through a robust business services strategy. (See the discussion in 2(b) that discusses the reinigorated business service strategy that TRWDB has adopted.)

Business and organized labor representatives are involved in the planning and development of the business services strategy through participation on the TRWDB, workforce development committees, and through their involvement in the local plan development process. Ultimately, the business services unit is charged with developing, overseeing, and evaluating the board's business services strategy.

The local area offers a robust suite of business services including:

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<sup>1</sup> [https://issuu.com/ugasbdc/docs/small\\_business\\_impact\\_2015](https://issuu.com/ugasbdc/docs/small_business_impact_2015)

- On-the-Job-Training (OJT): OJT allows companies to teach new employees the skills necessary to perform the job fully while reimbursing them for the lost productivity during the training period. TRWDB can help pay a portion of wages for qualified participants during an OJT period. OJT in the Three Rivers Region is provided on a sliding scale, which allows opportunities for small businesses to benefit from a higher wage reimbursement. The LWDB understands the needs of small businesses, and implemented this sliding scale to ensure that small businesses are able to benefit from this service;
- Incumbent Worker Training (IWT): TRWDB helps qualified companies with providing skills training or enhancement to existing employees. The goal of this program is to help local employers remain competitive in a rapidly changing environment. TRWDB can help defray the cost of classroom or on-the-job training. IWT can also be used as a strategy to help retain existing jobs or avert layoffs. One of the main in-demand industries within the local area includes Advanced Automotive Manufacturing. This industry continues to grow and develop in training needs for existing employees. This growth includes additional machinery being implemented in plants to produce more advanced transmissions and various other parts. PowerTech, Mobis, and DongWon are all experiencing growth due to the high demand of automotive parts by KIA and Hyundai. Incumbent Worker Training is a service that the LWDB is and plans to use to assist with meeting the demand to up-skill the existing workforce in the area of manufacturing and the automotive industry;
- Employer Workshops: The business services team will partner with local technical colleges to provide information on programs which offer a combined curriculum of soft skills training, OSHA Certification, Forklift Certificate, and an Introduction to Manufacturing Certification. We will also utilize our partnership with our local representatives from the International Union of Operating Engineers and the North Georgia Building Trades Academy to ensure employers are aware of the various options available to them;
- Customized Training: WorkSource Three Rivers helps meet the specialized training requirements for potential new hire candidates. Customized training reimburses the employer a portion of the cost for training programs for employment candidates who do not necessarily have the technical training, education, or experience required for the position;

- **Assessments and Screenings:** Potential employees are required to complete a career assessment (Prove-It, Career Scope, or MyNextMove), a drug screen and basic skills tests (if required) to ensure their compatibility with employer job descriptions and requirements. TRWDB’s mobile units will also administer assessments onsite at the employers’ location, including those required by the employer, as well as those required by WIOA;
- **Rapid Response:** Providing guidance to employers and re-employment support through local area services to employees who are laid off;
- **Job Fair Partnerships:** Partner with the Georgia Department of Labor (GDOL), Goodwill Industries, and other employment partners to host regular job fairs to provide key industries with recruitment channels;
- **Sector Strategy Development:** Workforce development and education leaders partner with key industries in the region to ensure that they have the talent they need to succeed. Sector partnerships bring together industry leaders in a specific industry cluster with educational institutions and workforce partners around a common vision and program of work.;
- **Registered Apprenticeship:** TRWDB will assist employers with creating and sustaining registered apprenticeships programs. RA programs combine on-the-job training with classroom training.
- **Partnership Building:** The business services team will aid in referrals for service by developing and sustaining relationships with the business community, educational institutions, other government programs, and nonprofits in the region.

c. **How will the area better coordinate workforce development programs and economic development? Additionally, identify economic development partners and describe the involvement of the economic development community in developing strategies.**

The TRWDB has prioritized relationship building with the region’s economic development team by visiting with economic development professionals, development authorities, and other economic development organizations across the region.

Economic development professionals were identified as a key stakeholder group in the development of this local plan. A focus group was held with economic development professionals to gather feedback during the development of the 2016-2019 plan. Since then, the TRWDB staff have participated in more events and meetings with economic development leaders in the region to explain the purpose and services of the board, and to learn the best ways to continue supporting and engaging with them.

The local area is focused on supporting economic development professionals across the region, including the Georgia Department of Economic Development (GDEcD) Existing Industry Representative, development authority staff members, economic development organization leaders, and other economic development professionals. The Business Services team will work with local development authorities to ensure potential new employers to the region and existing employers are aware of WIOA business services. This will be accomplished via email, conference call, and face-to-face meetings.

The board staff will continue to educate economic development partners about the services through outreach visits, attending development authority board meetings, periodic group meetings, and invitations to board meetings and functions. Through our partnerships with Region 4 Economic Development and local development authorities, (City of West Point, Newnan, and Upson-Thomaston) we have provided information and hiring solutions to companies such as Superior Recreation Products, Duracell, Caterpillar, and Milliken, through Incumbent Worker and OJT opportunities. Continued utilization of our economic development authorities in creating career pathways for local industries will assist us in ensuring that we are meeting the needs of our community through better utilization of WIOA funds.

**d. How will the area strengthen linkages between the one-stop delivery system and unemployment insurance programs?**

The local area will continue to strengthen existing partnerships and explore new partnerships to better serve individuals receiving unemployment insurance (UI) benefits. The Georgia Department of Labor (GDOL) is responsible for administering the state's UI program and the Wagner-Peyser funding. In addition to operating the UI

program, GDOL provides assessments, job search assistance, business services, labor market information, referrals, and other direct assistance to job seekers. Program management staff and career facilitators will partner closely with GDOL staff to process referrals and provide career and training services to UI recipients. Career facilitators are available in each of the GDOL career centers on a regular basis and actively participate in orientations and screenings.

Program management staff will provide training, updates, and materials to career center staff to ensure that UI customers receive information on training opportunities they may be eligible for. The local area will partner with GDOL on executing Rapid Response services to ensure that employees affected by layoff events have access to UI, Wagner-Peyser, and WIOA services to the fullest extent.

Program Management and Georgia Department of Labor (GDOL) staff will receive up-to-date employment opportunities from the Business Services team. Referrals will be sent to employers to assist them in filling their open positions. An effective referral system will assist in reducing the time individuals are receiving U.I. benefits. The TRWDB will utilize WIOA services such as OJT, ITAs, customized training, and sector strategies to help UI recipients find jobs. GDOL and TRWDB will work together to achieve positive and sustainable outcomes for UI system participants.

- 4. Regional Service Delivery – (Only applies to regions that encompass two or more local areas) Describe how the region will address the items listed below.**
  - a. Describe the plans for the establishment of regional service delivery strategies, including the use of cooperative service delivery agreements (if applicable).**
  - b. Describe the plans for coordination of administrative cost arrangements including the pooling of funds for administrative costs (if applicable).**

The TRWDB is the only local area in the region.

**5. Sector Strategy Development – Provide a description of the current regional sector strategy development for in-demand industry sectors.**

**a. Describe the partners that are participating in the sector strategy development.**

One sector strategy was developed in the area of manufacturing during program year 17 through program year 18. The local area will be working to develop a sector strategy, while continuing to support the initiatives of the previous sector, in healthcare. The sector partnership will involve leaders from business, chambers of commerce, economic development, government, and education. These leaders and champions will be identified during the local areas recovery summit in August of 2020. The education and training providers are West Georgia Technical College and Southern Crescent Technical College. The TRWDB staff plans to seek out partnerships with additional training and education providers to include the university system and private providers of healthcare training programs in the region. The TRWDB plans to recruit additional partners, local chambers of commerce, and K-12 Career, Technical and Agricultural Education representatives. The TRWDB’s Business and Industry Committee can potentially be re-established to assist with recruiting additional sector members during the planning phase, if necessary.

The LWDA has received input from our main partners and economic development professionals who support a shift in the region’s approach to the sector partnership toward economic recovery. COVID-19 has resulted in an increase in unemployment and an increased need in recovery efforts to support both a skilled workforce and job placement for employers working to provide essential services in the region. Virtual access has become a top priority for employers, as the look to leverage online platforms to reach potential employees. The LWDA plans to support opportunities, as guided by the region 4 economic development working group, that provide employers and citizens with access to jobs, training, and resources in the region.

**b. Describe the meetings that have taken place and the strategy by which partners will continue to be engaged.**

The healthcare sector partnership has not had a formal meeting. TRWDB program staff have maintained communication with the partners and recently identified a staff member to lead the sector strategy effort. Staff and key partners are currently planning the next phase of sector strategy development.

c. **Describe the research and the data that was used to identify the sector that was chosen for the sectors strategies training.**

Healthcare was selected as the second sector based on a review of both traditional and real-time labor market information (LMI), consultation with board members, and listening sessions with the community (e.g., economic development meetings, Business and Industry Committee meetings, other public engagement).

Traditional LMI indicates a growing number of healthcare positions in the region due to growth in the healthcare industry. Real-time LMI indicates a large number of postings for healthcare support and professional positions. Section 2A and 2B of the Strategic Elements, Governance and Structure provide some of the data that was used to support the decision to launch a manufacturing sector partnership.

d. **Provide a completed outline of the sector strategy for the previously identified sector that includes the following details:**

- i. **Participating employers:** The TRWDB staff are working to develop and bring on board participating employers in the healthcare industry to support this initiative.
- ii. **Target occupations:** Patient Care Technicians, Registered Nurses, Licensed Practical Nurses, Ambulatory Services staff, Medical Office staff, Medical Records and Information Technicians, Healthcare Practitioners and Technical Workers, Clinical staff, etc.
- iii. **Training programs:** Programs will be identified during Sector Partnership meetings and group sessions.
- iv. **Target Populations:** Adults, dislocated workers, disengaged youth, ex-offenders, veterans, and individuals with disabilities. Utilizing our strong partnerships and referral networks, TRWDB is able to

locate and engage the above individuals in trainings and job placement assistance, customized to their unique needs.

- e. **Describe the plans for future strategy development for future sectors. If applicable, discuss the next sectors to be targeted.**

The current focus is the successful launch and sustainability of the healthcare sector partnership. The next targeted sector will be logistics. Through community engagement with local healthcare providers, including WellStar, Pruitt Health, and Poplar Creek Assisted Living, the healthcare industry has been identified as an in-demand industry in our region. Employers have expressed difficulty in locating qualified talent in the areas of Certified Nursing Assistant (CNA), Licensed Practical Nurse (LPN), Registered Nurse (RN), and Bachelor of Science in Nursing (BSN). We will focus on creating a career pathway for individuals through ITAs, OJTs, and IWT opportunities.

The TRWDB’s Business and Industry Committee, in consultation with board staff, will determine the appropriate time to launch the next initiative. The local area is planning to apply for additional sector partnership grant funds (if available in the future), and will leverage the funding to expand their manufacturing and healthcare sector partnerships and expand into logistics. Figure 12 illustrates the process that the TRWDB will utilize to launch future sector partnerships.

**Figure 12. Sector Strategy Implementation**



**6. Description of the One-Stop Delivery System – Provide a description of the one-stop delivery system in the local area that includes the items detailed below.**

- a. **Provide a description of how the local board will ensure the continuous improvement of eligible providers of services through the system and ensure that such providers meet the employment needs of local employers, workers and jobseekers.**

TRWDB staff ensure the quality performance of service providers on a quarterly basis by reviewing exits, related employment, and job seekers’ comments during follow-up

interviews. Performance of all training institutions with WIOA-enrolled participants is monitored annually, and institutions may be removed from the approved provider list if monitoring reveals poor performance or non-compliance. Staff also review LMI and present it to the TRWDB to ensure the training offered continues to meet the economic conditions and workforce needs of businesses in the region.

In partnership with the regional technical colleges, the TRWDB works to ensure its training programs meet the needs of local employers. Additionally, one-stop operators communicate TRWDB strategic objectives to partners and providers to ensure services are focused on these priorities.

- b. Provide a description of how the local board will facilitate access to services provided through the one-stop delivery system, including in remote areas, through the use of technology and through other means.**

The one-stop delivery system will serve as the nexus for service delivery in the Three Rivers region. The one-stop centers will ensure that clients from across the region have access to the services they need to prepare for and find employment with a sustaining wage. The local area will continue to utilize its mobile units to provide services in areas of the region that do not have access to one-stop locations. The mobile units have computer labs with capabilities for testing, completion applications for services with workforce development and/or partner agencies, and completion of applications for employment opportunities within the region. The mobile unit goes to each of the communities in the region that do not have access to a comprehensive or affiliate one stop career center. This schedule is shared with community partners, and part of the shared documents distributed and posted by the one-stop operator in the region. Additionally, the mobile unit schedule is shared via social media outlets managed by the LWDA. The TRWDB will utilize technology to provide access to internet and online platforms in rural communities in the region. The mobile units' internet access has been tested in multiple areas in the region's rural communities. The mobile units are equip and able to give opportunities in rural communities that struggle with access to broadband access.

- c. **Provide a description of how entities within the one-stop delivery system, including one-stop operators and the one-stop partners, will comply with WIOA § 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology and materials for individuals with disabilities. This should include the provision of staff training and support and addressing the needs of individuals with disabilities.**

The TRWDB will ensure that universal access exists across the workforce system in the region. The board, staff, one-stop operators, one-stop partners, and contractors will ensure compliance with the Americans with Disabilities Act of 1990 and WIOA § 188, including physical accessibility and program accessibility. Three Rivers program management staff and the Equal Opportunity Officer will review and ensure compliance. The Equal Opportunity Officer will ensure that staff and partners receive ongoing professional development and are advised of changes in law and policy.

The local area will utilize USDOL's PROMISING PRACTICES IN ACHIEVING NONDISCRIMINATION AND EQUAL OPPORTUNITY: A SECTION 188 DISABILITY REFERENCE GUIDE as a tool to assist in developing and ensuring that best practices in accessibility are being implemented throughout the region. The guide can be located here: <https://www.dol.gov/sites/dolgov/files/OASAM/legacy/files/Promising-Practices-in-Achieving-Nondiscrimination-and-Equal-Opportunity-A-Section-188-Disability-Reference-Guide.pdf>

TRWDB partners with the Georgia Vocational Rehabilitation Agency (GVRA) to provide assistive technology for one-stop centers. GVRA also provides technical assistance and information to partners and providers on accessibility requirements. Having GVRA as a mandatory partner, and partner that actively participates in the One-Stop delivery system and TRWDB leverages the local area's ability to be at the forefront of conversations surrounding accessibility.

d. **Provide a comprehensive description of the roles and resource contributions of the one-stop partners.**

The roles and resource contributions of the one-stop partners are defined in the attached memorandum of understanding (MOU)/resource sharing agreement (RSA). The TRWDB staff recently has an annual one-stop partners meeting. Staff acquired the agreement and signatures of the one-stop partners on the MOU/RSA. The exact contributions and roles of the one-stop partners are detailed in the MOU/RSA between the one-stop partners and the TRWDB. The agreement is effective July 1, 2022 – June 30, 2023.

The overall role of the partners in the one-stop system is to design, implement, and manage a seamless system of service delivery focused on the needs and interests of job seekers and employers. The primary goal is to coordinate resources from partner agencies, thereby eliminating duplication and streamlining services.

- e. **Identify the current One-Stop Operator in the local area(s) and describe how the region/local area is preparing for the competitive process for operator selection. Describe how market research, requests for information and conducting a cost and price analysis are being conducted as part of that preparation.**

GDOL serves as the one-stop operator for the region. The local area has 1 comprehensive one-stop career center (Griffin GDOL ), and 3 affiliate one-stop career centers. of the career centers (Carrollton, LaGrange, and WorkSource Three Rivers Mobile Unit). In accordance with WIOA and state policy, the TRWDB plans to conduct a competitive process to procure one-stop operators in Fiscal Year 2020.

Local area staff members are currently preparing for the upcoming competitive one-stop operator procurement by conducting market research, talking with local areas that have completed successful procurements, collecting request-for-proposal (RFP) documents, and refining the requirements and scope of work. The local area will develop cost and price analyses by identifying similar areas (e.g., population, geography, economic conditions), analyzing their service delivery costs, and developing reasonable cost estimates. Additionally, through its membership in the National Association of Development Organizations, Three Rivers staff participate in the workforce development networking group where they discuss procurement strategy, market research, RFP development, and other related items. The TRWDB will also leverage technical assistance provided by the state to ensure a quality one-stop operator selection process.

## **7. Awarding Sub-grants and Contracts – Provide a description of the competitive process to be used to award the sub-grants and contracts in the local area for activities carried out under this Title I.**

The Three Rivers Workforce Development Board (TRWDB) follows the Three Rivers Regional Commission (TRRC) procurement policies. Before procuring a good or service, TRWDB administrative staff determines the appropriate procurement method based on the definitions for the types of procurement outlined in the TRRC

procurement policies. The TRWDB commonly uses the Request for Proposal (RFP) and Sealed Bid procurement methods for awarding contracts.

When awarding sub-grants to Adult, Dislocated Worker, or Youth service providers, admin staff seeks the approval from the appropriate committee(s) (Executive Committee—or Youth Committee—Youth Services) to procure services. TRWDB staff develops a RFP outlining the desired services based on the WIOA law and Federal and State policies and regulations. After the RFP is drafted, it is sent to the TRRC’s program and administrative personnel for review, and made available to the public through the TRRC’s website for a minimum of two weeks. The TRRC also utilizes the Georgia Local Government Access Marketplace ( [GLGA.org](http://GLGA.org) ), Items for Bid section, to solicit bidders for services.

Each committee forms an ad-hoc Review Committee made up of committee members and/or community representatives who are responsible for reading and scoring each proposal for merit using an evaluation tool that determines how well each question was answered. The ad-hoc committee also includes members of the TRWDB Leadership Team (Finance Coordinator, Workforce Director, and the appropriate Program Manager). Once the RFP closes, admin staff conducts a technical review and forwards the proposals to the appropriate Review Committee members for individual evaluation. After the proposals are individually reviewed and scored the Review Committee meets to deliberate and determine what recommendation will be made to the full committee. The Executive or Youth committee votes on the recommendation, as necessary, that is presented to the full Board for discussion and approval.

The criteria for selecting the winning proposal is not based solely on price; it also includes factors such as a vendor’s financial capacity, technical expertise, experience in the service or commodity being requested, facilities and support, ongoing training, and many other factors. The award criteria are listed in the RFP and may be evaluated by a committee of several individuals instrumental in developing the RFP. An RFP allows for a process of negotiating the conditions of an offer prior to contract execution.

Admin staff places the TRWDB’s final approval of the service provider selection on the TRRC Council agenda for ratification and approval pursuant to the Chief Local Elected Officials (CLEO) Consortium and Joint Working Agreement.

After TRRC Council approval, the Bidder/Service Provider is issued a letter of intent, after which the Service Provider enters into contract negotiations with designated admin staff, if applicable/needed.

When an equitable agreement has been reached between both parties, a contract between the service provider and the TRWDB is developed, and signed by the service provider, TRWDB Chair, TRRC Executive Director, TRRC Council Chair and the TRWDB Workforce Director, if applicable, for full execution as the final phase of the competitive process.

**8. EEO and Grievance Procedures – Briefly describe local procedures and staffing to address grievances and complaint resolution.**

When a complaint is received, regardless of topic, the complaint is forwarded to the Equal Opportunity Officer for documentation and resolution. The Equal Opportunity Officer will work with the complainant and other parties to resolve the complaint. The TRWDB’s Grievance and Complaints Procedure is included as Attachment 6. The Equal Opportunity Officer for the local area is Hope King.

Each one-stop center has an agreed-upon complaint procedure and has identified a staff person to receive and resolve complaints.

# Local Boards and Plan Development

- Local Boards** – Provide a description of the local board that includes the components listed below.
  - Describe how local board members are identified and appointed. Include a description of how the nomination process occurs for adult education and labor representatives. (Proposed § 679.320(g))

Local board members are identified and selected in accordance with the TRWDB’s Chief Elected Officials Organization By-Laws. Figure 13 illustrates the current board membership structure. Attachment 1 includes the current board roster.

**Figure 13. Board Membership Structure**



One Business Representative is selected from each of the 10 counties in the region. The county commission chair and one of the county’s mayors are responsible for identifying

a local employer representative to serve on the TRWDB when there is a vacancy in the seat. The remaining board members are appointed by the Chief Local Elected Official. The Adult Education Representative is selected from the two adult education providers in the local area. The Labor Representatives are appointed in consultation with the Georgia AFL-CIO.

**b. Describe the area's new member orientation process for board members.**

Each new board member is provided a two-page job description that details the roles, expectations, and guidelines for board members. The Workforce Board Director schedules a meeting with each new board member to review the job description and answer any questions about serving on the workforce board. Formal training is scheduled if more than one new board member joins at the same time. TRWDB staff is currently in the process of updating the member orientation booklet.

**c. Describe how the local board will coordinate workforce development activities carried out in the local area with regional economic development activities carried out in the region (in which the local area is located or planning region).**

The TRWDB aims to forge a stronger relationship with economic development activities in the region. The board will coordinate and align workforce development investments with economic development by establishing clear lines of communication, ensuring that economic development professionals understand the TRWDB service offerings, and engaging regularly with development authorities and other economic development organizations. The local area will also engage economic development professionals in current and future sector partnership activities.

Economic development professionals were identified as a key stakeholder group for engaging in the plan development process. The Workforce Board Director, Program Services Manager, and Business Services Manager all attend and participate in economic development meetings in the local region on a regular basis.

d. **Describe how local board members are kept engaged and informed.**

Members of the TRWDB are engaged through several mediums throughout the year. The TRWDB aims to have engaged board members who fulfill the strategic, leadership, and oversight roles established by WIOA. First, each board member is provided meeting packets in advance of meetings to allow for informed action. Second, the board has a robust committee structure to engage members between the bi-monthly meetings. Committees typically meet in non-board meeting months to keep members engaged. Third, TRWDB is planning a half-day planning workshop to engage board members in shaping the future strategic direction of the organization.

**2. Local Board Committees – Provide a description of board committees and their functions.**

Committees serve a crucial role in engaging board members and accomplishing the strategic vision of the workforce board. Table 10 describes the current TRWDB committees.

**Table 10. Three Rivers Workforce Development Board Committee Structure**

Committee	Function
<b>Executive Committee</b>	This committee has the authority to conduct business on behalf of the TRWDB. This committee also performs the function of reviewing the budget.
<b>Governance</b>	This committee is responsible for overseeing and reviewing the governance structures and practices of the TRWDB.
<b>One-Stop</b>	The One-Stop Committee is responsible for the oversight and leadership of the local area’s comprehensive one-stop program. It reviews each center’s operations, oversees the resource sharing agreement, tracks performance, and manages the certification process.
<b>Youth</b>	The Youth Committee is responsible for the leadership and oversight of the youth program. It oversees the youth program contracts and youth program delivery and reviews and makes recommendations on the youth program budget.

**3. Plan Development** – Provide a description of the process by which the plan was developed including the participation of core partners, providers, board members and other community entities. Also describe the process used by the local board to provide a 30 day comment period prior to the submission of the plan including an opportunity for public comment, including comment by representatives of businesses and comment by representatives of labor organizations, representatives of education and input into the development of the local plan.

The local plan development process was designed to maximize stakeholder input, ensure that the plan represents the interests and needs of the region, and ultimately produce a strategic action plan that will impact human capital needs in the region and improve the lives of individuals and families through jobs. Figure 15 displays the key elements that comprised the local plan development process.

**Figure 15. Local Plan Development Process Elements**



The key stakeholders in the plan development process were: local employers, board members, GDOL, GVRA, adult education leaders, local elected officials, labor

organizations, chambers of commerce, local economic development organizations, social/supportive service agencies, and K-12 and post-secondary education.

The plan development process involved: interviews with staff, a review of prior planning efforts; a review of LMI, and a public comment period. The local area plans to have a summit and to gain more input from stakeholders in August to support and add additional details to the plan prior to final submission in October, and in light of COVID-19.

Public comments and feedback will be solicited through multiple mediums. The draft plan will be posted on the TRWDB website for review. Notification of the comment period will be pushed out through outreach to mandatory partners, social media, and email to key stakeholders.

## Service Delivery and Training

- 1. Expanding Service to Eligible Individuals** – Provide a description of how the local board, working with the entities carrying out core programs, will expand access to employment, training, education and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. Include how the local board will facilitate the development of career pathways and co-enrollment, as appropriate, in core programs, and how it will improve access to activities leading to a recognized postsecondary credential, academic or industry-recognized.

Outreach is one of the most important ways the TRWDB staff is working to expand access to employment, training, education, and social/supportive services for eligible individuals, particularly individuals with barriers to employment.

The TRWDB is contracting with a training provider who has a strong background in assisting ex-offenders. This provider has been able to assist the board in finding employment for ex-offenders in welding, an occupation that has not typically been open to them in the past. The board is also planning to work with several local organizations to help employers better understand the benefits of hiring returning citizens, how to insure or bond these individuals, the skills they may bring to the position, and how to better understand the information in a background check.

The board is exploring partnership opportunities to promote targeted job fairs for individuals with barriers to employment. Based on feedback, the TRWDB is also working on ways to incorporate targeted information sessions for other stakeholders, such as economic developers and business and industry, to educate them about the important and vital work that the TRWDB does.

Youth Services staff are working with youth who have gone through career pathways in school. Once these youth have graduated, the TRWDB is working to help them attain employment more quickly.

As a result of employer feedback, the board will work to expand and emphasize training on soft skills. Soft skills have been identified by employers as a significant issue in both recruiting and employee retention.

**2. Description of Service to Adults and Dislocated Workers – Provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area.**

For Adult and Dislocated Workers, the TRWDB provides three tiers of service:

1. Self-Service
2. Basic Career Services
3. Individualized Training Services

The first level of service provided to Adult and Dislocated Workers within the local area is Self-Service. Self-Service is available to any citizen in the community. WIOA staff are available at the One-Stop Career Centers — Carrollton, Griffin, or LaGrange. Basic Services include LMI, assistance with resources provided by GDOL (e.g., computers, copier, fax machines), orientation to the one-stop system and other services available through WIOA, and referrals to other agencies for public assistance or other services. The TRWDB also has mobile units that are deployed to remote or more rural areas and counties. These mobile units only provide WIOA services, whereas an individual may receive GDOL services at the One-Stop Career Centers.

WIOA services are intended to be more extensive when customers cannot get a job through Self-Service. Participants who remain unemployed or are determined to lack self-sufficiency can access Basic Career Services. Basic Career Services may include a comprehensive assessment, development of an Individual Employment Plan (IEP), intensive job development, career counseling, soft skills development, and more. Customers with unique needs, such as veterans or ex-offenders, are identified and offered specialized resources during case management with a Career Facilitator. During case management, an IEP is developed for program or training services.

Under WIOA, it is no longer necessary for a participant to fail to secure employment prior to receiving training services. Individuals who lack marketable skills may be referred to Individualized Training Services. Individualized Training Services are funded by WIOA and include Occupational Skills Training, OJT, Skill Upgrading/Re-Training, and others. Options for training are determined on an individual basis and are implemented based on need, prior experience, and marketable skills.

**3. Description of Rapid Response Services – Provide a description of how the local board will coordinate workforce development activities carried out in the local area with statewide rapid response activities.**

The TRWDB has a standard method of handling Rapid Response services in response to plant closings and downsizing. The Business Services Division staff handles coordination of all Rapid Response activities with GDOL. GDOL staff ensure that all mandatory partners are aware of a Worker Adjustment and Retraining Notification (WARN) notice. If the staff finds out that a business is closing without having issued a WARN notice, GDOL will contact both the closing business to offer Rapid Response services as well as notifying workforce staff.

If the company accepts the Rapid Response services for its employees, GDOL develops potential information sessions for individuals affected by the layoffs or closures. Even if the company does not accept the services, all efforts are exhausted to make the company aware that the services are free and how they benefit the workers. All coordination efforts are disclosed with state Rapid Response coordinators and partners. Follow-up is conducted to ensure that services are provided to all companies for which a WARN notice is issued.

The TRWDB may approve use of Rapid Response funds to assist with transition for affected workers. This can include professional services, in addition to WIOA services, for job search, resume preparation, financial counseling, counseling to deal with a layoff, and other services.

**4. Description of Youth Services – Provide a description and assessment of the type and availability of youth workforce development activities in the local area, including activities for youth with disabilities. This description and assessment shall include an identification of successful models of such youth workforce development activities.**

The Three Rivers Region serves only out-of-school youth (OSY). Out-of-school youth eligible for WIOA services are 16-24 years old, have dropped out of high school, do not have a GED or high school diploma, and are not currently employed or enrolled in post-secondary education.

All Youth Services have been moved in-house, and the staff providing services are staff of the fiscal agent. The TRWDB contracted out youth services in previous years, and have experienced a lack of performance in the local area by the contractors providing services in the region. The activities provided to youth include mentoring; tutoring; referral to other services, such as counseling; work experience; internships; job shadowing; employability skill training, including resume writing, computer research skills, and others; and financial literacy. The goal is for the youth to explore different careers and to help them figure out what they want to do after they have gained employability skills. All activities are available to individuals with disabilities.

Once basic eligibility is determined, the youth are assessed for the types of services they need and an IEP is created. After creating an IEP, the youth looking for employment are taught soft skills. Based on feedback from local employers and other partners, the TRWDB is looking to expand and improve soft skills training offerings. Soft skills have been identified as one of the biggest barriers to employment. Youth must successfully complete this training before moving on to work experience.

To encourage more youth to take advantage of work experience, the TRWDB recently lengthened the amount of time out-of-school youth may participate in work experience from 240 to 480 hours. In addition, the board increased the hourly wage that from \$7.25 per hour to \$8.50 per hour, with a raise available upon successful completion of the first

240 hours. To better align with WIOA and the needs of out-of-school youth, the TRWDB also recently changed the timing of their incentive program.

During the youth's work experience, the TRWDB receives evaluations from the employers. If the youth need improvement, the TRWDB will work to get them mentoring or counseling. The TRWDB works to ensure a youth receives adequate counseling before termination. Upon completion of the work experiences, the youth receives a final evaluation to see if they showed growth from the midpoint to the end of their work experience. The TRWDB has found this model to be successful, in that many youth have been offered unsubsidized employment by the sponsor company upon completion of the work experience.

For those seeking post-secondary education, the TRWDB helps the youth explore their interests and the types of education they need or might want, and then works with the youth to schedule tours of post-secondary institutions, helps them fill out the Free Application for Federal Student Aid and any college applications, obtain transcripts, and provide any other necessary tools and tips. The TRWDB provides financial assistance for youth as they apply for admission.

The TRWDB staff also bring in guest speakers to put on workshops on teen pregnancy, parenting/family health, entrepreneurship, and other subjects. Upon completion of each workshop, the youth receive a certificate.

Once youth obtain unsubsidized employment on their own or enter post-secondary education, they are exited from the program and the TRWDB conducts a 12-month follow-up. The TRWDB will not exit out-of-school youth from the program until they have successfully gained employment, earned their GED, or entered post-secondary education. This ensures that the youth are self-sufficient prior to exiting the program.

**5. Implementation of Work-Based Learning Initiatives – Provide a description of how the area will implement initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries and other business services and strategies designed to meet the needs of employers in the corresponding region in support of the business service strategy.**

The TRWDB has recently undertaken a number of steps to implement and improve work-based learning initiatives. One of these initiatives is to create a sliding pay scale for OJT so that smaller employers in the local area receive a larger wage reimbursement. Employers with 50 or fewer employees may receive up to 75% wage reimbursement; employers with 51-250 employees may receive up to 65%; and employers with 251 or more employees, up to 50%. The board determined that this sliding scale was appropriate for their area.

For Incumbent Worker Training (IWT), the board has utilized IWT training as an opportunity to support existing industry in the region. Since the last regional plan, the board has developed a policy that meets the needs of the region, and supports industry in the region. Recently, the TRWDB's IWT project with Superior Recreation in Carrollton, GA won a National Association of Development Organizations Impact award. The local area has developed additional successful IWT projects, and continues to promote these projects.

In the area of Customized Training, each training is developed around employer needs, such as the manufacturing certificate. The board has taken the view that customized training and continuing education programs are not just about receiving credit for training but also about economic development and improving the whole community. The board plans to continue to implement customized training programs through agreements and/or contracts with training providers in partnership with local employers.

**6. Provision of ITAs – Provide a description of how training services in WIOA § 134 will be provided through the use of ITAs. If contracts for the training services will be used, describe how the use of such contracts will be coordinated with the use of ITAs and how the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided.**

Individual Training Accounts (ITAs) are provided to individuals seeking and recommended for training assistance through review and evaluation by the Career Facilitators (CFs). ITAs are utilized if a CF identifies that an individual needs training services to obtain employment, or to increase skill sets to obtain a higher wage. The TRWDB has established a \$7,000 annual funding limit per customer for ITAs.

A customer determined eligible to receive WIOA-funded training may, after consultation with a CF, select a provider from the State Eligible Training Provider List (ETPL). Currently, ITAs are provided under two technical college contracts. These contracts allow staff to review and create ITAs under policies established by the TRWDB.

Customers receive labor market information during orientation, and additional information is provided during review of assessments and during individual appointments with the CFs at each of the one-stops in the region. Information and counseling focus on in-demand occupations in the region, allowing customers to make informed decisions on training opportunities that will result in quality employment opportunities.

CFs assist youth in choosing appropriate service providers and programs through a comprehensive assessment process. During this process, youth customers are required to complete a training readiness program. The program includes, but is not limited to, time management skills, financial management, decision-making skills, and study skills. These activities prepare youth for success in post-secondary occupational training.

**7. Entrepreneurial Skills Training and Microenterprise Services – Provide a description of how the area will coordinate and promote entrepreneurial skills training and microenterprise services.**

Currently, entrepreneurial skills and microenterprise services training are primarily provided through Youth Services as the demand is noted in these customers. Youth Services contractors typically bring in speakers to talk about entrepreneurship. TRWDB will assess additional opportunities for supporting and developing entrepreneurial skills and microenterprise skills.

For Adult and Dislocated Workers, staff refer clients to local resources that provide entrepreneurship and microenterprise services. Referral partners include the University of Georgia Small Business Development Center, the Burson Center (business incubator in Carroll County), local small business development courses sponsored by the Small Business Administration, SCORE Atlanta, local chamber small business administration, and downtown development authority finance programs. Staff will identify and share free and low-cost training courses (in-person and webinars) offered by partner organizations with interested participants. TRWDB will also support developing entrepreneurship skills through skills development programs ITAs from the ETPL.

**8. Coordination with Education Programs – Provide a description of how the local board will coordinate education and workforce development activities carried out in the local area with relevant secondary and postsecondary education programs and activities to coordinate strategies, enhance services and avoid duplication of services.**

The Three Rivers Workforce Development Board will serve as the region’s convener around workforce development. This important role will involve close partnership and coordinated with secondary and post-secondary education. These partners include 11 school districts, two Technical College System of Georgia institutions, and two University System of Georgia institutions.

The TRWDB works closely with local technical colleges to provide training opportunities to meet the demands of employers in the region. The area’s technical colleges serve as a key training partner for TRWDB and serve the largest number of ITA participants. The local area collaborates with TCSG institution leaders, including academic affairs, economic development, deans, and instructors, to ensure that credit and non-credit courses meet the region’s needs. The relationship ensures that the institutions have in-demand programs that include the hard skills and soft skills required by key employers. TRWDB has productive and long-standing relationships with the area’s two technical colleges.

The Three Rivers region is home to 11 school districts and several college and career academies. The local area works cooperatively with these K-12 workforce development programs to align curriculum, share resources, and work cooperatively to build a talent pipeline. For example, TRWDB staff members have participated in manufacturing days hosted by K-12 education and the college and career academies in the region. As a result of the information provided at these events, there have been discussions about ways the TRWDB can partner with youth in secondary education — either through apprenticeship programs (example: Coweta County’s new German apprenticeship program), or by providing access to continued training after completion of studies at a college and career academy.

The local area can use its convening role to bring the region’s educational providers to the table to work cooperatively to meet the region’s workforce needs. No single educational institution can meet the workforce development needs. TRWDB continue to involve educational institution leaders in regional strategic planning efforts related to workforce development.

- 9. Description of Supportive Services – Provide a description of how the local board will coordinate workforce development activities carried out under this title in the local area with the provision of transportation, including public transportation, and other appropriate supportive services in the local area. Describe the coordination of transportation and other supportive services**

**regionally, if applicable. Please include the region/local area Supportive Service Policies.**

Payments for supportive services are available for qualified registrants in Individualized Training Services and/or classroom training and to out-of-school youth who are attending classroom-type training. Registrants must be making satisfactory progress in their training course to receive the payments.

### Transportation

The TRWDB recognizes that transportation is an essential component of workforce development and that transportation in west central Georgia is a significant barrier to successfully completing training and obtaining employment. The board may directly fund and/or purchase transportation resources for individuals or an identified group of trainees. Such circumstances typically include occasions where a number of participants are attending the same training institution, program, or class; occasions when a training provider is making special arrangements to provide training for a particular group; individuals with disabilities requiring special transportation arrangements; and others. Funding transportation in these or other circumstances may be provided if the TRWDB determines that the services/activities are needed and will improve participants' opportunities to successfully complete training and obtain employment.

Contractors who provide Youth Services can purchase vouchers from the Three Rivers Regional Commission in certain counties so that youth can get back and forth to their meetings/work/testing. The TRWDB is investigating the expansion of these services to counties that do not have transportation. Transportation and meals are funded at \$12 per day.

### Childcare

The TRWDB funds a variety of other supportive services, primarily childcare. For one child, age 13 or younger who resides in the home of the registrant, reimbursement is limited to \$20 per day. Reimbursement of \$30 per day is available for two or more children. If both parents are in training, only one parent may receive the childcare reimbursement.

### Emergency Auto Repair

Participants may receive a one-time Emergency Auto repair assistance if the repair is deemed as necessary in order for the participant to attend training. The repair must be the most economical option for the participant's transportation needs.

The repair must not exceed a maximum of **\$500.00**. Three (3) repair cost quotes from licensed Auto Repair shops must be provided along with proof of insurance and registration in the participant's name. Copies must be maintained in the participant's file and GWRROP. WIOA funding will be used to pay for the least expensive quote. Payments will be made directly to the Auto Repair shop.

### Emergency Utility Assistance

Emergency Utility Assistance payment is available one-time per program enrollment. The assistance must be determined as necessary. Participant must provide the original utility bill the assistance is being requested for. The bill must be in the participant's name or legal spouse's name (listed on Family Composition) for the address listed on the WIOA case. Payments will be submitted directly to the utility company for the amount of the bill not exceeding a maximum of **\$350.00**.

Should funding be limited the LWDB Director may issue limits and/or priorities for issuance of supportive services to the extent deemed necessary.

### Emergency Health Care & Medical Services

Emergency Eye glasses or protective eyewear (healthcare) may be provided if there are no other resources available to provide the eyewear, and the customer cannot see.

Broken eyeglasses may be replaced if the customer cannot afford to replace them and cannot attend classes. Payment will be submitted directly to vendor or reimbursed to the participant upon receipt of paid invoice not exceeding a maximum of **\$200.00**.

Payment will only be reimbursed for basic single vision or bifocals, no add-ons such as transition lens, etc.

### Other Supportive Services

Other supportive services available for youth clients include teen pregnancy counseling by the health department; medical needs, approved on a case-by-case basis (e.g., glasses, dental work, medical exams, shots); training supplies, such as the purchase of

books, tools, shoes, uniforms, other occupation-specific equipment, or interview attire; and referral to other services such as counseling and mentoring.

### COVID Supportive Services

During the pandemic the TRWDB voted to provide additional supportive services to eligible participants. These services included a stipend during the lock down, Chromebook/laptops, and broadband stipends for participants registered in a training service. The local area has continued the additional technology support for eligible youth and dislocated worker participants.

## **10. Coordination with Social Service Programs – Provide a description of how the local board will coordinate with social service providers, including SNAP and TANF. The description should include the utilizations of both programs as a referral source.**

The LWDA will continue to participate in community meetings that involve social service providers in the region. These meetings include but are not limited to the local area community collaborative groups, community partnership meetings that involve specific community initiatives, drug court/probation working groups, etc.

Currently, the local area works with the local drug courts in some of the counties in the region. The drug courts have mandated that individuals must job search. These individuals are subject to routine drug screenings, and are required to actively engage in job search efforts provided by the TRWDB staff and One-Stop Operator.

Additionally, the local area actively engages with community collaborative groups by speaking on the agenda often, and providing access to our staff for referrals to services.

Local Department of Family and Children Services representatives are provided with the LWDA's information and website for services. The LWDA frequently reaches out for referrals and partnership opportunities. These efforts will continue, as the LWDA works to strengthen this partnership for greater outcomes for both agencies.



## Coordination with Core Partners

- Description of the Workforce System** – Provide a description of the workforce development system in the local area that identifies all relevant programs and how the local board will work with the entities to carry out both core and other workforce development programs to deliver well aligned services in support of the strategies identified in the state plan. This should include programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.).

**Local Vision and Goals:** The mission of the parties within the Workforce Development and the One-Stop System is to design, implement, and manage a seamless system of service delivery focused on the needs and interests of job seekers and employers. A primary goal is to coordinate resources from partner agencies, eliminating duplication, and streamlining services.

The workforce system in the Three Rivers region is made up of core partners and other workforce development programs. Collectively, the core partners represented in the system are the Georgia Department of Labor (Wagner-Peyser), Technical College System of Georgia (adult education), and the Georgia Vocational Rehabilitation Agency. Additional workforce development programs that comprise the one-stop system in the local area include the Three Rivers Area Agency on Aging (senior employment programs) and the Division of Family and Children Services (SNAP, TANF, child-care assistance, job preparation, Medicaid).

The TRWDB will serve as a regional convener for workforce development activities. This convening role will include the workforce system partners listed above and other organizations that have a role in training the region’s talent pool. Other partners include the Carl Perkins-supported programs in the region (Career, Technical, and Agricultural Education programs in local school districts and occupational training programs at West Georgia Technical College and Southern Crescent Technical College). The TRWDB will help bring workforce development stakeholders to the table to

develop a coordinated strategic direction, ensure the seamless delivery of services, reduce duplication, and ultimately better serve the employees and employers in the region. The convener role will also help the board implement and coordinate the implementation of the strategic priorities identified in the state plan (e.g., ex-offenders, veterans, career pathways, sector partnerships).

**2. Coordination with Wagner-Peyser – Provide a description of plans and strategies for, and assurances concerning, maximizing coordination of services provided by the state employment service under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) and services provided in the local area through the one-stop delivery system, to improve service delivery and avoid duplication of services.**

Wagner-Peyser services are delivered by GDOL. They are key partners in the workforce system and in delivering services to clients. The TRWDB works with each GDOL Career Center manager and staff to: coordinate service delivery; ensure that a strong referral network exists; and reduce duplication of services. The key to ensuring seamless service delivery and avoiding duplication over the next four years will be ongoing communication and the implementation of the memorandum of understanding/resource sharing agreement. The Wagner-Peyser program provides job seekers with assessment tools, access to job search assistance, referrals to additional services (including WIOA Title I services), and provides services to businesses (e.g., referrals, job orders, specialized recruitment).

The local workforce area currently partners with GDOL in workshops within each career center to ensure that all individuals receiving Wagner-Peyser services are provided information regarding WIOA services. Career Centers in our region are a true access point for job seekers to opportunities in addition to Wagner-Peyser. For example, the LWDB staff members in each center are a referral source for training opportunities for individuals receiving Unemployment Compensation. Staff in each center are able to create and develop ITAs. GDOL referrals for training opportunities through the LWDB are routinely done, and often lead to successful performance outcomes for Dislocated Workers seeking assistance, prior to the end of Unemployment Compensation, in the local workforce region. The LWDB plans to continue a coordinated effort in partnership

with GDOL to provide referrals at a specific point in time for someone nearing the end of UI benefits.

Employ Georgia remains a major component for job seekers receiving Wagner-Peyser services. GDOL staff and LWDB staff work together to ensure job seekers are able to navigate the site and create resumes for job search that are professional and marketable to employers in the region. This coordinated effort between GDOL and WIOA provides job seekers with access to assistance within a career center with a guided job search, and this effort provides the job seeker with an opportunity to engage in WIOA basic services – which could potentially lead to more individualized or training services.

Wagner-Peyser services include Business Services. The LWDB Business Services Specialists works in partnership with GDOL Business Services and Veteran Services representatives to provide coordinated services to meet employer recruiting needs in the region. The LWDB is currently working with the GDOL Region 4 Coordinator on future projects to provide On-the-Job Training opportunities.

**3. Coordination with Adult Education** – Provide a description of how the local board will coordinate workforce development activities carried out in the local area with the provision of adult education and literacy activities under title II in the local area, including a description of how the local board will carry out, consistent with subparagraphs (A) and (B)(i) of section 107(d)(11) and section 232 of the WIOA Law, the review of local applications submitted under title II.

The local area has strong partnerships with its adult education and literacy providers in the region. West Georgia Technical College and Southern Crescent Technical College provide adult education services to individuals in the region. The TRWDB has a two-way referral system between WIOA Title I services coordinated by the TRWDB, and Title II services coordinated by the technical colleges. The board refers clients to adult education activities if they need assistance with completing a GED to further their career. Adult education refers clients to the TRWDB if they need additional training or support to find a career in the region. Workforce development activities are coordinated with Title II programs by involving adult education leadership staff in strategic planning and having a Title II representative on the TRWDB. Additionally, the MOU/RSA will govern program/service delivery in the one-stop system.

The LWDB continues to partner with the Adult Education programs in the region to develop and implement career pathways for individuals enrolled in Adult Education.

**4. Coordination with Vocational Rehabilitation** – Provide a description of the cooperative agreement between the local Georgia Vocational Rehabilitation office and the local board which describes efforts made to enhance the provision of services to individuals with disabilities and to other individuals, cross-train staff, provide technical assistance, share information, cooperate in communicating with employers and other efforts at cooperation, collaboration and coordination.

The Georgia Vocational Rehabilitation Agency (GVRA) operates programs that “help people with disabilities to become fully productive members of society by achieving

independence and meaningful employment.<sup>2</sup> GVRA is a natural partner to the workforce development mission of the TRWDB. The TRWDB and GVRA will work together as partners to serve their clients in ways that promote successful employment outcomes. The MOU (see Attachment 5) details the role of GVRA as a mandatory partner in the one-stop system. The TRWDB and GVRA will execute an addendum to the MOU in Fall 2016 to cover the additional cooperative agreement requirements stipulated by WIOA.

The TRWDB and GVRA will work together to serve individuals with disabilities through referrals, use of applicable programs (e.g., ITAs, work experience, OJT, supportive services, GVRA accommodation assistance), and shared case management. TRWDB will work to develop shared and seamless intake, referral, and processes procedures to enhance outcomes for eligible job seekers. TRWDB and GVRA will achieve these outcomes stronger partnerships and mutual understanding. For example local area program managers recently conducted a presentation for GVRA staff on the Title I services and training programs available in the region. GVRA and the TRWDB will continue to strengthen their relationship by hosting information sessions, joint training, process reviews, and other collaborative functions.

The partners will also work together to assist employers in the region with employing individuals with barriers to employment by providing social/supportive services, technical assistance, and OJT. The business services team will work with GVRA local and state staff to deliver business solutions to employers that included individuals with barriers to employment. GVRA will also actively participate in sector partnership development and execution efforts.

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<sup>2</sup> <https://gvra.georgia.gov/about-us>

## Performance, ETPL and Use of Technology

1. **Description of Performance Measures** – (WFD will issue instructions for the completion of local area performance negotiations upon receipt of federal guidance.) Provide a description of the local levels of performance negotiated with the Governor and chief elected official pursuant to WIOA § 116(c), to be used to measure the performance of the local area and to be used by the local board for measuring the performance of the local fiscal agent (where appropriate), eligible providers under subtitle B and the one-stop delivery system, in the local area.

To be inserted upon receipt from TCSG OWD

2. **One-Stop System Performance and Assessment** – Provide a listing of locally/regionally developed one-stop performance standards and describe the criteria used to develop the performance standards. Describe how the one-stop system and regional service delivery is assessed by the local board.

The workforce board receives quarterly reports from the one-stop operator on the array of services provided to customers accessing services at the comprehensive one-stop site as well as the number of customers receiving services from which partner via the comprehensive one stop site. The one stop operator worked with the one stop partners in PY18 – PY19 to develop a referral process for the partners to use. Adjustments are being made to this process. Reports will be provided to the workforce development on the information gathered from this process. Also, the one-stop operator is having partners meetings on a bi-weekly basis, and has provided training to the one-stop staff on the referral process.

**3. ETPL System – Describe the regional Eligible Training Provider System, including the elements listed below.**

**a. Provide a description of the public notification to prospective providers.**

The TRWDB solicits for new training providers through announcements and by posting via social media. The board’s website announces information regarding the opportunity for providers to submit proposals and provides a link to the application package. A record of all inquiries is maintained and providers who express interest are added to the bidders’ list for future notices.

The LWDB solicits for new providers on a routine basis. The request for new providers can be driven by an immediate need for training in the region that is not being provided by any provider at the time the training is identified as a need. However, the LWDB staff members continue efforts to search for providers in line with the LWDB schedule to ensure that all new provider recommendations are reviewed and prepared for LWDB review.

**b. Provide a description of how the board(s) evaluates providers and proposed training programs for initial eligibility, based on (at a minimum) criteria of proven effectiveness, local employer/industry demand, accreditation and customer accessibility.**

With WIOA’s focus on quality customer outcomes, the TRWDB has developed a standard application, a set of evaluation criteria, and a provider/program responsiveness checklist to evaluate prospective training providers. In the application providers must describe a set of conditions to which they will adhere and activities they will provide for WIOA customers, if approved as eligible providers.

For initial provider determination, the TRWDB reviews each applicant’s past performance in the state-established categories, their accreditation status, evidence of training programs in growth occupations, and whether or not the provider is within reasonable commuting distance of the region’s participants. Staff also evaluate training success, compare costs, length of training, and anticipated wage at placement among

similar providers. The board then conducts an on-site pre-operational review of new or unknown training institutions.

For those prospective providers deemed responsive, staff conduct employer and program graduate reference checks to ensure customers will receive quality training. Those providers recommended by the reviewers are forwarded to the Office of Workforce Development for review, acceptance, and inclusion on the ETPL.

**c. Provide a description of the formal appeals process for aggrieved ITA customers and providers of unapproved training programs.**

Any complaint by an individual, group, or organization is first addressed informally before a grievance is filed. Grievances are filed in accordance with the written procedures established by the TRWDB.

Once a grievance has exhausted the local procedures, the board follows the guidelines established by the state. If a complainant receives an unfavorable decision by the local hearing officer, the complainant has a right to request a review by the state, using the WIOA Complaint Information Form. The completed form is forwarded to the Compliance Director, Office of Workforce Development.

The Grievance and Complaint Procedure is included in the WIOA Service Manual and made available to customers and providers.

**d. Provide a description of the ongoing process used to update the data on the eligible providers list (exclusive of the state-conducted continued eligibility process).**

The performance of all training institutions with participants enrolled in WIOA is monitored on at least an annual basis. Institutions may be removed from the ETPL if monitoring reveals non-compliance with the Act or poor performance. The TRWDB uses state data along with participant data collected from all training institutions using the participants' grades, attendance, and progress reports. Data indicating the number

of participants entering employment is also evaluated. If performance falls below the region's standards (as set by Office of Workforce Development), the provider is notified that corrective action is needed and additional enrollments are curtailed.

Additionally, the LWDB is provided with monthly spending for each provider. A review is done monthly to ensure that participants have completed training and certifications prior to receiving the final payment from the LWDB. The Program Services Manager is made aware of any outstanding invoices due to performance by a provider, and provides the follow-up within a 30 day timeframe.

- e. **Provide a description of any regional policies or agreements for ITAs or training providers.**

The LWDB has adopted the policies attached for ITAs. There are currently no policies associated with training providers. The LWDB has adopted the state ETPL parameters and performance requirements identified in the state policy and procedure manual as a measure for the region.

- f. **Provide a description of the process to track and manage all ITA activity.**

Career Facilitators provide recommendations for customers to receive ITAs. These recommendations are evaluated and approved by the TRWDB staff. Once an ITA is approved, the funds are tracked by Three Rivers Regional Commission accounting staff to ensure that invoices reflect only what has been approved in the ITA, and that costs do not exceed the cap. Any request for additional funds or to add time to the ITA requires approval by management. These processes are tracked internally with the voucher form, edit request, and ITA document. The local area uses an internal excel tracking document to track and manage a portion of the ITA activity; additional tracking is done in Georgia Work Ready Online Participant Portal.

- g. **Provide a description of local board policy on use of statewide eligible training provider list (including financial and duration limits, out-of-area training, service to out-of-area customers, etc.).**

Continued inclusion on the ETPL is contingent upon successful placement of enrollees, as evaluated by TRWDB staff on a quarterly basis.

The TRWDB has established a \$7,500 annual funding limit for each customer's ITA. Training must be in occupations identified by the TRWDB or through approval of exceptions, as stated in the area's ETPL application package. Training must be provided for at least 12 hours per week and the maximum length of training is 104 weeks.

Training programs must be within a reasonable commute of the TRWDB region, which may include in-state and out-of-state programs/institutions. Out-of-area training programs that are not within commuting distance and/or out of state may be approved on a case-by-case basis. All approved training must be located within the contiguous United States. Training programs must be on the state-approved list.

Priority for training services is given to Three Rivers area Adults, Youth, and Dislocated Worker applicants. Services for Dislocated Workers are also available to employees of companies located in the region's service area. Self Service is universally available to all customers, regardless of residence. Residents of other service areas wishing Basic Services and/or Individualized Training Services — other than Dislocated Workers, as stated above — are referred to their LWDB.

**h. Provide a description of how registered apprenticeship programs are added to the ETPL.**

As required by WIOA, Regional Apprenticeship programs will be automatically eligible to be included on the ETPL, in accordance with the statewide process established by the GDEcD Workforce Development.

**4. Implementation of Technology – Provide a description of the technology used to enhance customer (participant and business) experience and any additional data analytics used to enhance planning and measure outcomes beyond mandated performance measures.**

The TRWDB is currently undertaking a variety of technology-related initiatives to enhance customer experience. For example, the board uses GDOL's online applicant tracking system, Employ Georgia, to assist with employment placement. By incorporating Employ Georgia into how staff search for and recruit candidates, it is easier to see resumes and help employers fill positions. This system allows the TRWDB to search all available applicants by keyword, rather than contacting CFs individually, thereby allowing employers faster access to the most qualified applicant pool. The TRWDB is working to keep mobile units up-to-date with technology, as staff are able to do assessments on mobile units by appointment.

To improve outreach, the TRWDB is engaging in more social media, particularly Facebook, Twitter, and Instagram. Social media is used both to target youth and to advertise workforce services to businesses. In addition, the board plans to update the assessments used to identify customers' occupational strengths and weaknesses. Assessments that are more interactive and user-friendly are being recommended for purchase and use across the region. Files for Adults and Dislocated Workers are kept electronically. As of July 2016, the board anticipates that all files will be cloud-based.

Finally, the board is actively pursuing the use of data analytics to better understand their customers — both employers and applicants — as well as what works in serving both and measuring outcomes.

## State Initiatives and Vision

### 1. **State Branding** – Provide a description for how the area will adopt and utilize the state brand.

After receiving the state brand document in mid-August 2016, the local area has adopted the branding criteria to include the appropriate WorkSource logo and other elements with signage and other materials. All information produced by the local area includes the state brand WorkSource Georgia, Connecting Talent with Opportunity.

The local area plans to continue to fully adopt the state brand. The name, color scheme, tagline, logo, and other brand elements will be phased in over time as web, print, social media, and consumable materials are updated or replaced.

### 2. **Priority of Service** – Describe how the area/region will identify and administer the state’s priority of service policy. Identify if the region will add target populations in addition to those specified by state and federal policy

The Workforce Innovation and Opportunity Act of 2014 (WIOA) requires Priority of Service be given to “public benefits recipients, other low-income individuals, and individuals who are basic skills deficient” when providing career and training services using WIOA Title I adult funds. WIOA Section 134(c)(3)(E)

#### Priority of Service Must be Provided in the Following Order:

1. Veterans and Eligible Spouses WIOA § 3 (63)(A), TEGL 3-15, TEGL 10-09
2. Low Income Individuals
  - ⊙ SNAP or TANF recipient (current or within last six months)
  - ⊙ Supplemental Social Security (SSI) recipient
  - ⊙ Homeless individual
  - ⊙ Receives free or reduced-price lunch
  - ⊙ Is a foster youth

- ⊙ Is an individual with a disability whose own income meets WIOA's income requirements, even if the individual's family income does not
- ⊙ Receives an income or is a member of a family receiving an income that, in relation to family size, is at or below 150% of the current Lower Living Standard Income Level (LLSIL) and Dept.of Health and Human Services (HHS) Poverty Guidelines (whichever is higher)

### 3. Basic skills deficient

#### Additional Restrictions

1. Individuals applying for training services and who already have one of the following will be considered for retraining on a case by case basis.

- ⊙ an attainment of a recognized public technical college or private proprietary school certificate/credential
- ⊙ an attainment of a recognized public technical college diploma
- ⊙ an attainment of a recognized public technical college associate degree
- ⊙ bachelor's degree

2. Individuals who currently have a master's degree or any higher advanced degree will not be eligible for retraining.

3. An individual who has had WIOA funded training but did not complete the training will not be considered for additional training unless information provided to the WIOA office can substantiate the extenuating circumstances on why the individual did not complete training.

4. Training assistance for individuals seeking a four-year college and advanced degrees will only be approved for funding in areas that are occupational specific, and are in current demand areas, and can be completed within the time limits set by WIOA.

#### When Services or WIOA Resources are Limited:

In accordance with 20 CFR Section 663.600, and WIOA Section 134(d)(4)(E), if limited funding has been declared in the local area, priority of service must be provided in the following order: WIOA § 3 (63)(A), TEGL 3-15, TEGL 10-09

1. Veterans and Eligible Spouses WIOA § 3 (63)(A), TEGL 3-15, TEGL 10-09
2. Low Income Individuals

- ⊗ SNAP or TANF recipient (current or within last six months) ⊗ Supplemental Social Security (SSI) recipient ⊗ Homeless individual ⊗ Receives free or reduced-price lunch
- ⊗ Is a foster youth
- ⊗ Is an individual with a disability whose own income meets WIOA's income requirements, even if the individual's family income does not ⊗ Receives an income or is a member of a family receiving an income that, in relation to family
- ⊗ size, is not in excess of the current Lower Living Standard Income Level (LLSIL) and Dept. of Health and Human Services (HHS) Poverty Guidelines (whichever is higher)

### 3. Basic skills deficient

#### Additional Restrictions

1. Individuals applying for training services and who already have one of the following will be considered for retraining on a case by case basis.

- ⊗ an attainment of a recognized public technical college or private proprietary school
- ⊗ certificate/credential ⊗ an attainment of a recognized public technical college diploma
- ⊗ an attainment of a recognized public technical college associate degree
- ⊗ bachelor's degree

2. Individuals who currently have a master's degree or any higher advanced degree will not be eligible for retraining.

3. An individual who has had WIOA funded training but did not complete the training will not be considered for additional training.

4. Training assistance for individuals seeking a four-year college and advanced degrees will only be approved for funding in areas that are occupational specific, and are in current demand areas, and can be completed within the time limits set by WIOA.

The TRWDB will continue to actively participate in and support state workforce development initiatives. The staff will continue to identify opportunities to align programs, policies, and investments to meet the vision and goals of the state initiatives.

## Attachments

## Attachment 1: Local Workforce Development Board Member Listing

TRWDB ROSTER						
LWIOA 8 Region as of 8.3.2022						
	Location (County)	First Name	Last Name	Title, Organization	Date of Membership	Expiration date
<b>Private Sector 51% Requirement</b>						
Seat 1	Butts	Lisa	Durden	Executvie Director, Butts County Chamber of Commerce	3-Aug-22	3-Aug-25
Seat 2	Carroll	Rhyne	Owenby	Director of Member Engagement, Carroll County Chamber	4-Nov-20	4-Nov-23
Seat 3	Coweta	Steven G.	Olive	President, Oasis Aviation Maintenance, Inc	3-Aug-22	3-Aug-25
Seat 4	Heard	Frank "Chunk"	Newman	Project Executive, Batson-Cook	28-Feb-19	28-Feb-23
Seat 5	Lamar	Meg	Hattendorf	HR Manager, Continental Tire the Americas, LLC	4-Nov-20	4-Nov-23
Seat 6	Meriwether	Joey C.	Barrett - Vice Chairman	Local Manager, (Meriwether, Upson and Crawford Counties) , Georgia Power Company	2-Jan-18	2-Jan-23
Seat 7	Pike	Kevin	Hilton	Plant Manager, Ten Cate Protective Fabrics	28-Apr-16	28-Apr-23
Seat 8	Spalding	Dave	Lamb	General Manager, CareMaster Medical Services	26-Apr-18	26-Apr-23
Seat 9	Troup	Brandon	Eley - Chairman	President, 2Big Feet LLC	28-Apr-16	28-Apr-23
Seat 10	Upson	David	Banks	Industrial Sales Manager, Georgia Power Company	8-Sep-21	8-Sep-23
<b>Workforce Representative: 20% Requirement</b>						
Seat 1	Jennifer	Corcione	<b>CAFI - Executive Director</b>	1380 LaFayette Parkway	3-Mar-20	3-Mar-23
Seat 2	Vacant					
Seat 3	Mack	Clark Jr.	GDOL Career Center Manager	1514 GA Highway 16 West	3-Aug-22	3-Aug-25
Seat 4	Jeff	Rogers	<b>Administrative Director, Joint Register Apprenticeship and Traing Program; Training Trust Union</b>	6120 Purdue Drive SW, Atlanta, GA 30336	28-Feb-19	28-Feb-23
<b>Education and Training Representatives (2 seats Minimum)</b>						
Seat 1	Dr. Irvin	Clark III	<b>President, SCTC</b>	501 Varsity Road	29-Jul-22	29-Jul-25
Seat 2	Angela	Berch	<b>Vice President, WGTC - Economic Development</b>	1 College Circle	22-Aug-19	22-Aug-23
<b>Government and Economic Development (3 seats Minimum)</b>						
Seat 1	Amanda	Fields	<b>Project Manager of Economic Development, Region 4</b>	75 Fifth Street, N.W., Suite 1200	25-Oct-18	25-Oct-23
Seat 2	Paul	Workman	<b>Employment Relations Coordinator, GVR</b>	233 12th Street, Suite 402	29-Jul-22	29-Jul-25
Seat 3	Gail	Long	<b>Assistant Director of Regional Operations, GDOL</b>	Carrollton CC, 275 Northside Drive	28-Apr-16	28-Apr-23
		<b>19</b>		<b>Members</b>		
		<b>10</b>		<b>Total Business Members</b>		
		<b>9</b>		<b>Total Workforce Members</b>		



## Attachment 2: PY21 & PY22 Local Negotiated Performance Goals





**LWDA 08 Three Rivers Performance Metrics for PY22 and PY23  
Final Agreed to 6/29/2022**

	<b>PY22 Expected Level</b>	<b>PY 22 Proposed Level</b>	<b>PY 22 LWDA Response</b>	<b>PY 22 Negotiated Level</b>	<b>PY 23 Expected Level</b>	<b>PY 23 Proposed Level</b>	<b>PY 23 LWDA Response</b>	<b>PY 23 Negotiated Level</b>
<b>Adult Program</b>								
Employment Rate 2 <sup>nd</sup> Quarter After Exit	87.8%	90.0%	90.0%	<b>90.0%</b>	88.8%	91.0%	91.0%	<b>91.0%</b>
Employment Rate 4 <sup>th</sup> Quarter After Exit	78.6%	78.0%	78.0%	<b>78.0%</b>	79.6%	79.0%	79.0%	<b>79.0%</b>
Median Earnings 2 <sup>nd</sup> Quarter After Exit	\$6,473	\$6,120	\$6,120	<b>\$6,120</b>	\$6,473	\$6,120	\$6,120	<b>\$6,120</b>
Credential Attainment within 4 Quarters After Exit	85.5%	82.0%	82.0%	<b>82.0%</b>	88.1%	84.6%	84.6%	<b>84.6%</b>
Measurable Skill Gains	80.8%	63.0%	63.0%	<b>63.0%</b>	80.8%	63.0%	63.0%	<b>63.0%</b>
<b>Dislocated Worker Program</b>								
Employment Rate 2 <sup>nd</sup> Quarter After Exit	92.2%	84.0%	84.0%	<b>84.0%</b>	93.2%	85.0%	85.0%	<b>85.0%</b>
Employment Rate 4 <sup>th</sup> Quarter After Exit	88.1%	87.0%	87.0%	<b>87.0%</b>	89.1%	88.0%	88.0%	<b>88.0%</b>
Median Earnings 2 <sup>nd</sup> Quarter After Exit	\$8,370	\$7,750	\$7,750	<b>\$7,750</b>	\$8,370	\$7,750	\$7,750	<b>\$7,750</b>

	<b>PY22 Expected Level</b>	<b>PY 22 Proposed Level</b>	<b>PY 22 LWDA Response</b>	<b>PY 22 Negotiated Level</b>	<b>PY 23 Expected Level</b>	<b>PY 23 Proposed Level</b>	<b>PY 23 LWDA Response</b>	<b>PY 23 Negotiated Level</b>
Credential Attainment within 4 Quarters After Exit	91.7%	88.0%	88.0%	<b>88.0%</b>	92.7%	89.0%	89.0%	<b>89.0%</b>
Measurable Skill Gains	72.3%	63.0%	63.0%	<b>63.0%</b>	72.3%	63.0%	63.0%	<b>63.0%</b>
<b>Youth Program</b>								
Employment Rate 2 <sup>nd</sup> Quarter After Exit	83.5%	81.0%	81.0%	<b>81.0%</b>	84.5%	82.0%	82.0%	<b>82.0%</b>
Employment Rate 4 <sup>th</sup> Quarter After Exit	78.3%	77.0%	77.0%	<b>77.0%</b>	78.3%	77.0%	77.0%	<b>77.0%</b>
Median Earnings 2 <sup>nd</sup> Quarter After Exit	\$3,250	\$3,000	\$3,000	<b>\$3,000</b>	\$4,334	\$3,100	\$3,100	<b>\$3,100</b>
Credential Attainment within 4 Quarters After Exit	52.3%	52.0%	52.0%	<b>52.0%</b>	52.3%	52.0%	52.0%	<b>52.0%</b>
Measurable Skill Gains	46.2%	47.0%	47.0%	<b>47.0%</b>	46.2%	47.0%	47.0%	<b>47.0%</b>

## Attachment 3: Memorandum of Understanding/Resource Sharing Agreement

**Memorandum of Understanding**  
Between  
**Workforce Development a Division of Three Rivers Regional Commission**  
And  
**The Department of Labor District VI – Region IV**

**Purpose**

The purpose of this Memorandum of Understanding (MOU) is to define the roles and responsibilities of each partner as mutually agreed by the parties for the operation of the one-stop delivery system. The purpose of this MOU is to ensure that all one-stop partners are aware and accountable for the performance of the one-stop delivery system. Workforce Innovation and Opportunity Act (WIOA) mandates that each Three Rivers Workforce Development Board (TRWDB), with the agreement of the Chief Elected Official (CEO), enter into a MOU between the TRWDB and one-stop partners – including all entities that serve as partners offering services and contributing resources through Region 4 for which the Three Rivers Regional Commission TRWDB provides policy, oversight and governance.

- A. WIOA Section 121 (c) requires that each TRWDB, in agreement with the Chief Elected Official (CEO), develop and enter into an MOU between the TRWDB and the one-stop partners, with all the entities that serve as partners in the one-stop delivery system that operates in Area 8 Region 4 – Three Rivers Region Workforce Area.
- B. WIOA Section 121 (b)(1)(A)(iii) mandates all entities that are required partners in a local area to enter into an MOU with the TRWDB.
- C. WIOA Section 121(b)(1) identifies federal programs that are required to make services available through each career center in the Three Rivers Workforce Area. The entities that receive the federal funds for each of these programs and/or have the responsibility to administer the respective programs in the area are required partners.
- D. WIOA Section 121 (b)(2) prescribes how entities that provide programs other than those required under WIOA Section 121 (b)(1)(B) may participate in the local areas delivery system as “additional partners” and may provide the services available under their programs through the workforce one-stop delivery system.
- E. WIOA Section 121 (b)(2)(A) details that both required and additional partners are included as parties to the MOU. All entities that participate in the one-stop delivery system as partners, whether required or additional, must be parties to this MOU and must abide by the terms prescribed herein and by all applicable federal, state, and local rules, plans, and policies as applicable and authorized under the Partner’s program and in keeping with federal guidelines.
- F. WIOA Section 121 (b)(1)(A)(iv) indicates that the requirements of each partner’s authorizing legislation continue to apply under the one-stop delivery system and that participation in the one-stop delivery system is in addition to other requirements applicable to each partner’s program under each authorizing law.

## Parties

Workforce Development having selected a One-Stop Operator enters into this MOU with the One- Stop Operator, and the affiliated partners listed below. The One-Stop Operator and affiliate sites are comprised of the following Partner programs Georgia Department of Labor – Region IV, Vocational Rehabilitation a Division of the Georgia Vocational Rehabilitation Agency, Career and Technical Education, Community Services Block Grant Agency, Job Corps and Three Rivers Regional Commission.

<b>Partner Name</b>	<b>Program</b>
Georgia Department of Labor	Unemployment Insurance, Wagner-Peyser, Veteran’s Programs, TRADE
Technical College System of Georgia - Adult Education	Adult Education and Literacy, Post-Secondary Vocational Education
(GVRA) – Vocational Rehabilitation	Vocational Rehabilitation
Athens Community Council on Aging	Senior Employment Program
Technical College System of Georgia - Technical Education	Perkins Career & Technical Education
Workforce Development a Division of Three Rivers Regional Commission	WIOA Title I – Adult, Dislocated Worker, and Youth Programs
Community Services Block Grant Agency	Barrier Removal; Housing Assistance
Job Corps	
The Legacy Link, Inc.	Senior Employment Program

This agreement specifies the role of the Operator as coordinator of the services of the sites approved by the TRWDB and listed in Attachment A – One-Stop Career Centers. It is understood by the parties that the Operator will identify an individual to serve as liaison to the TRWDB in writing to Workforce Development. It is further understood that the Operator will notify Workforce Development as changes occur in the identity of the designee.

It is understood by the parties that all mandated partners as identified in the Workforce Innovation and Opportunity Act will be a party to this agreement. Mandated partners are the local entities described in the Workforce Innovation and Opportunity Act. Other partner agencies may be included in the One-Stop. The operator will ensure that all participating partners understand and agree to this MOU. Representatives of the mandated partners will meet with Workforce Development (WIOA) and/or One Stop Committee/WDB on an agreed upon schedule to ensure the development and implementation of a seamless system of coordinated service delivery.

## Duration

This MOU will begin July 1, 2022 and remain in effect for three years. Infrastructure Funding Agreement is effective from July 1, 2022 to June 30, 2025, with quarterly reconciliation of shared cost provided by partners to TRWDB. Budgeted and actual cost will be up-dated with information provided by partners no later than 15 days after the end of each

quarter.

## **Amendments**

This MOU will be reviewed not less than once every 3-year period to ensure appropriate funding and delivery of services.

This MOU may be amended at any time by written agreement of the parties. All amendment requests must be submitted to Workforce Development and include:

1. The requesting party's name
2. The reason(s) for the amendment request
3. Each section of this MOU that will require revision
4. The desired date for the amendment to be effective
5. The signature of the requesting party's authorized representative

If the request is approved by the TRWDB all affected partners will be required to sign the amendment and a fully executed amendment will be distributed to all parties.

## **Counterpart Signature**

The modification may be signed in counterparts, meaning each signatory can sign a separate document as long as the LWDB Chair (or designee) acquires signatures of each party and provides a complete copy of the modification with each party's signature to all the other Parties.

## **Local Vision and Goals**

The mission of the parties and of Workforce Development and the One Stop System is to design, implement, and manage a seamless system of service delivery focused on the needs and interests of job seekers and employers. A primary goal is to coordinate resources from partner agencies, eliminating duplication and streamlining services. The Parties to the Agreement seek to attain the goals given in the Region IV Workforce Regional Plan.

## **Roles and Responsibilities**

### General

The parties to this agreement assure that they will fully comply with the nondiscrimination and equal opportunity provisions of Section 188 of the Workforce Innovation and Opportunity Act and its implementing regulations 29 CFR part 38. This regulation prohibits the exclusion of an individual from participation in denial of the benefits of, discrimination in, or denial of employment in connection with any programs and activities funded or otherwise financially assisted in whole or in part under Title I of WIOA because of race, color, religion, sex, national origin, age, disability or political affiliation or belief, or, for beneficiaries, applicants, and participants only on the basis of citizenship status, or participation in a program or activity that receives financial assistance under Title I WIOA.

The parties to this agreement will assure that complaints alleging discrimination on any of the

above bases will be processed in accordance with 29 CFR Part 38.69, and local TRRC - Workforce Development grievance policies.

The parties to this agreement assure that facilities at all sites or centers afford accessibility and reasonable accommodation. Facilities will be programmatically and architecturally accessible. Reasonable accommodations will be made for individuals with disabilities.

The parties to this agreement will provide ongoing and continual notification that the sites do not discriminate on any of the prohibited bases in accordance with 29 CFR Parts 38.69 through 38.45 of the implementing regulations for Section 188 of the Workforce Innovation and Opportunity Act.

It is expressly understood that this Agreement does not constitute a financial commitment, but rather intent to specific resources in the future as the parties' allocations and budgets are known and the one-stop system evolves. The One- Stop system is evolving. Neither its costs nor the partners' resource contributions remain static.

The parties agree to coordinate and share resources in accordance with the Infrastructure Cost Sharing Agreement.

The parties commit to sharing services and resources to prevent duplication and overlap, and foster a more streamlined service delivery system.

The parties commit to meeting the performance standards set for Region IV Workforce Development.

The parties agree that centers will be certified by the Three Rivers Workforce Development Board using the criteria provided by TRRC – Workforce Development.

### **The Workforce Development Board**

The Local Workforce Development Board's (TRWDB) legislated responsibility is to be the policy and oversight entity responsible for organizing a comprehensive, community-wide response to the challenges of building a highly skilled workforce.

Quality assurance is an important part of the role of the TRWDB under WIOA. The TRWDB will establish minimum organizational and performance standards, which can be used to certify and evaluate the capability of organizations seeking to provide services as part of the local workforce system. These same standards will be used as a basis for evaluating the performance of certified suppliers, services, products, and other elements in the system. The TRWDB will encourage and promote a structured, continuous improvement methodology. The Operator and Affiliated Partners assure that they will use the established standards as a basis for organizational self-assessment and improvement.

Through the implementation and certification of quality standards, the TRWDB will provide one-stop centers, program operators, affiliates, and other service providers with the oversight, on-going technical support and technical assistance they need in order to identify problems, take corrective actions, and meet performance expectations. The Operator will assure that the Center

and affiliate sites meet the chartering criteria provided to each center.

The coordination of available resources – federal, state, and private sector – is a significant responsibility of Workforce Boards under WIOA. With the inclusion of major programs and Partners as Titles of the Workforce Innovation and Opportunity Act, it is clear that the TRWDB is expected to coordinate resources in a way that fosters the overall functioning of an entire workforce development system, not just a single program. The parties commit to coordinating services and resources to enhance services to customers to prevent duplication and overlap, and to foster a more effective streamlined service delivery system.

### The Operator

The TRWDB shall procure a One-Stop Operator. The agency will thus be responsible for management, coordination of services, operations, financial accountability, legal obligations, and all reporting requirements of the full service center and affiliate sites. Through the business plan, the Operator will demonstrate its capability to set direction, manage overall operations, including staff oversight, customer services and continuous improvement. The business plan is a part of this agreement.

The duties of the Operator include, but are not limited to, the following:

- Design the integration of systems and coordination of services for the site and partners.
- Coordinate service providers across the one-stop delivery system.
- Establish full service one-stop centers as approved by the TRWDB.
- Generate invoices and bill partners
- Manage and document resource sharing and fiscal responsibility for centers.
- Evaluate performance and implement required actions to meet standards of quality and performance set by state, federal, and local oversight agencies.
- Evaluate customer needs and satisfaction data to continually refine and improve service strategies.
- Plan and report responsibilities.
- Write and maintain a business plan.
- Act as liaison with the TRWDB and centers.
- Monitor adherence to the provisions of the Memorandum of Understanding.
- Market services.
- Recruit additional partners and/or potential affiliate sites to better serve customers.
- Define and provide means to meet common operational needs, i.e. training, technical assistance, additional resources, etc.
- Facilitate the sharing and maintenance of data.
- Define clearly and communicate the strategic objectives of the TRWDB to partners, customers and the community.
- Continuously assess customer needs and recommend to the TRWDB any need for additional access points or mini sites.
- Respond to community needs.
- Facilitate team meetings on common issues – what works, what does not, etc.

- Select the site manager(s).
- Define the site manager's responsibilities in conjunction with the TRWDB and the partners.
- Ensuring neutral brokering, the assurance that no organization, member, or partner is biased in any referral to itself or any other specific organization that provides education, training, and/or placement services. The Operator will ensure a record of referrals is maintained by the center(s).
- Ensure center and sites meet chartering criteria.
- Obtain signatures of Participating Partners on the MOU.
- Ensure that the sites are operated and services delivered in accordance with the Workforce Innovation and Opportunity Act.
- Ensure connectivity for affiliate sites and partners.

## **Partners**

All participating partners will sign the Memorandum of Understanding. Partners will meet responsibilities as outlined in WIOA Section 121(b). Partners in each center or site will be defined as those entities signing the MOU and responsibilities shall include the following elements:

- Making career services applicable to each partners' program available to job seekers in the One-Stop delivery system. Career Services, as described in WIOA Section 134(c)(2), may include:
  - Outreach, orientation, intake
  - Initial and comprehensive skills assessments
  - Job search and placement assistance
  - Group, individual and career counseling and/or career planning
  - Provision of labor market information, including information on in-demand industries and occupations, job vacancies, skills required, wage information and nontraditional employment
  - Recruitment and business services on behalf of employers
  - Provision of referrals to and coordination of activities with other programs and services
  - Provision of local performance accountability and measures
  - Provision of program cost information on eligible training providers]
  - Follow-up services, as appropriate, for participants in workforce investment activities who are placed in unsubsidized employment.
- Provide access to training services and employment and training activities as described in WIOA
- A strong entrepreneurial approach designed to serve the customer and simplify bureaucratic systems;
- Bringing funded and/or in kind resources;
- Providing staff to be supervised by the managing entity, or providing state-of-the art electronic linkage in lieu of a staff person;
- Providing a needed service in the area as identified in the MOU with the lead agency;
- Sharing in the cost of the center as described in the Resource Sharing Agreement;
- Supporting the center's mission, goals, and business plan.

- Supporting the purpose of the WIOA, which is “to strengthen the United States workforce development system through innovation in, and alignment and improvement of, employment, training, and education programs in the United States, and to promote individual and national economic growth”.

**Goals and Objectives**

The parties agree to the Goals and Objectives for the Region 4 Workforce Development One-Stop System as agreed to by the TRWDB and published in the Region IV Workforce Plan.

**Center Locations**

Griffin One Stop Career Center  
*(Comprehensive Career Center)*  
 1514 Highway 16 West  
 Griffin, GA 30223

LaGrange One Stop Career Center  
*(Affiliate Site)*  
 1002 Longley Place  
 LaGrange, GA 30240

Mobile Unit  
*(Affiliate Site)*  
 1210 Greenbelt Drive  
 Griffin, GA 30223

Carrollton One Stop Career Center  
*(Affiliate Site)*  
 275 Northside Drive  
 Carrollton, GA 30117

In addition, services may be provided at other locations and/or events as needed or appropriate to best serve customers.

**Services**

The parties agree to the Workforce Delivery System described in the Region IV WIOA Plan. The Operator’s Business Plan is incorporated into this agreement upon approval by the TRWDB. Additional information relative to service delivery strategies are attached to this document.

**Data Collection**

The local system partners will use the automated tools provided by WFD/GDOL for data collection and sharing across partner services. Local partners develop other means to ensure sharing of customer information..

**Liability**

The Operator is solely responsible and liable for its actions and its employees, agents and/or assigns. Each Partner is solely responsible and liable for the actions of its employees, agents, and/or assigns. The Operator has no responsibility or liability for the actions of the TRWDB, which is solely responsible and liable for its actions and those of its employees. The Fiscal Agent is solely responsible and liable for its actions and those of its employees.

**Notice Provisions**

The primary point of contact for notices will be the TRWDB.

## **Disputes**

The Operator will first attempt to resolve disputes occurring at the centers informally. Any partner may call a meeting of all partners to discuss and resolve a dispute. The Operator will follow the process and procedures for dispute resolution as outlined in the business plan and consistent with the Board's grievance procedure. Should the Operator fail to resolve the dispute, it shall be referred to the Workforce Development Director who will convene a meeting of the parties to establish the facts of the dispute and identify any applicable policies and/or regulations for the parties to the dispute. The Workforce Development Director may mediate and resolve the dispute, if possible. A report of the dispute, its resolution, and relative information will be shared with the TRWDB. If the dispute is not resolved, it will be given to the Chair of the TRWDB who will place the matter on the agenda of a full meeting of the TRWDB which shall attempt to resolve the dispute.

## **Confidentiality**

The parties agree to honor the Share and Release Agreement, Attachment 1, located in this MOU. The Share and Release Agreement is signed by applicants indicating that they grant permission to release information to other agencies for the provision of services. Each partner agency's statement will be honored by other partner agencies. Exchanged information shall remain private and confidential in accordance with the most restrictive confidentiality requirements of any of the parties collecting, receiving, or sharing information.

## **Cross- Referral**

The parties adopt cross-referral arrangements, which are included in the local WIOA plan, including modifications. Individuals seeking basic, individual, and/or training services may be referred to the One Stop Centers or to an affiliate site. If a person seeks services at the One Stop Center rather than the partner's site, services should be made available to him or her without referral to another location (based on staffing ability and/or conflicting federal regulations). Participants may receive referral to appropriate training and education programs that have the capacity to serve the participant or applicant either on a sequential or concurrent basis.

Coordination of referrals will be made utilizing Workforce Development's referral forms for services offered to Adults, Dislocated Workers and Youth under Title I of WIOA and for services offered by partner agencies. Utilizing these forms will ensure appropriate methods are used to document the services to be provided, service begin and end dates, and referral status and follow-through. All referrals are required to be tracked by appropriate staff at the One-Stop Center and any information pertinent to referrals (including number and type of referral) should be made available to Workforce Development on a monthly or as needed basis.

## **Severable Provision**

It is agreed that should any part of this Memorandum be found null and void, or is otherwise stricken, the rest of this MOU shall remain in force.

## **Indemnification Clause**

The parties to the MOU recognize the partnership consists of various levels of government, not-for-profit entities. Each Partner to this MOU shall be responsible for injury to persons or damages to property resulting from negligence on the part of itself, its employees, its agents, or its officers to the extent allowable by law. No party assumes any responsibility for any other party the State or the non- State entities, for the consequences of any act or omission of any third party. The parties acknowledge the FCWPES Local WDB shall have no responsibility and/or liability for any actions of the one-stop center employees, agents and/or assignees. Nothing herein shall be constructed as a waiver of a Partner's (to the extent applicable) sovereign immunity or any immunity available to such Partner's employees, officers or agents.

## **Open Records**

This MOU is subject to the Georgia Open Records Act.

## **Governing Law and Venue**

The venue for any legal proceedings between or among the Partners that relate to this MOU and IFA shall be Fulton County, GA

## **Breach of Statement of Work or Addendum**

Except as otherwise indicated herein, no Party may, during the term of this MOU or any renewals or extensions of this MOU, assign or subcontract al or any part of the MOU without prior written consent of other Parties.

**This MOU Supersedes all prior and contemporaneous understandings and conditions, oral or written, express or implied, respecting the subject matter hereof.**



Dear Local Workforce Development Area 8:

In accordance with § 678.725, LWDA 8 hereby notifies the Governor concerning the results of its MOU negotiations. The LWDA 8 has reached an agreement as to the MOU (including the local infrastructure funding mechanism component of the MOU) for **PY 21**.

Therefore, it is recommended that the LWDB Chairman, Chief Elected Official and our required Partners provide their signatures below to approve the agreement.

Signatures:

  
Local TRWDB Chairman

  
Chief Local Elected Official



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A proud partner of the American Job Center network

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**Required Partner Signatures:**

  
\_\_\_\_\_  
One-Stop Partner

Programs authorized under WIOA Title I-B (Adult, Dislocated Worker, Youth, Job Corps., Youth build, Native American Programs, and Migrant Seasonal Farmworker Programs);

\_\_\_\_\_  
One-Stop Partner

Programs authorized under the Wagner- Peyser Act (29 U.S.C. 49 et seq.);

\_\_\_\_\_  
One-Stop Partner

Adult education and literacy activities authorized under Title II;



*Chris Wells*

One-Stop Partner

Programs authorized under title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.) (other than section 112 or part C of Title

One-Stop Partner

Activities authorized under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.);

One-Stop Partner

Career and technical education programs at the postsecondary level authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)

One-Stop Partner

Activities authorized under chapter 2 of Title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.)

One-Stop Partner

Activities authorized under chapter 41 of Title 38, United States Code (Jobs for Veterans State Grants Programs)

One-Stop Partner

Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)

N/A

One-Stop Partner

Employment and training activities carried out by the Department of Housing and Urban Development



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One-Stop Partner

---

One-Stop Partner

Programs authorized under title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.) (other than section 112 or part C of Title

Activities authorized under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.);

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Activities authorized under chapter 2 of Title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.)

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Activities authorized under chapter 41 of Title 38, United States Code (Jobs for Veterans State Grants Programs)

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Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)

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N/A

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One-Stop Partner

Employment and training activities carried out by the Department of Housing and Urban Development



**Required Partner Signatures:**

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\_\_\_\_\_  
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\_\_\_\_\_  
One-Stop Partner

A handwritten signature in black ink, appearing to be "J. [unclear] SA", written over a horizontal line.

Adult education and literacy activities authorized under Title II;



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**Required Partner Signatures:**

  
\_\_\_\_\_  
One-Stop Partner

Programs authorized under WIOA Title I-B (Adult, Dislocated Worker, Youth, Job Corps., Youth build, Native American Programs, and Migrant Seasonal Farmworker Programs);

x   
\_\_\_\_\_  
One-Stop Partner

Programs authorized under the Wagner- Peyser Act (29 U.S.C. 49 et seq.);

\_\_\_\_\_  
One-Stop Partner

Adult education and literacy activities authorized under Title II;



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\_\_\_\_\_  
One-Stop Partner

Programs authorized under title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.) (other than section 112 or part C of Title

*Gene Anthony*  
\_\_\_\_\_  
One-Stop Partner

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\_\_\_\_\_  
One-Stop Partner

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\_\_\_\_\_  
One-Stop Partner

Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)

N/A  
\_\_\_\_\_  
One-Stop Partner

Employment and training activities carried out by the Department of Housing and Urban Development



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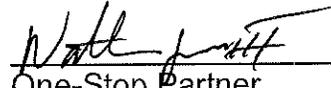
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Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)

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N/A

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Employment and training activities carried out by the Department of Housing and Urban Development



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Activities authorized under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.);

\_\_\_\_\_  
One-Stop Partner

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x Chris Sun  
One-Stop Partner

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x Chris Sun  
One-Stop Partner

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\_\_\_\_\_  
One-Stop Partner

Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)

N/A  
\_\_\_\_\_  
One-Stop Partner

Employment and training activities carried out by the Department of Housing and Urban Development



\_\_\_\_\_  
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Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)

N/A  
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Employment and training activities carried out by the Department of Housing and Urban Development



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Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)

N/A

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One-Stop Partner

Employment and training activities carried out by the Department of Housing and Urban Development





Dear Local Workforce Development Area 8:

In accordance with § 678.725, LWDA 8 hereby notifies the Governor concerning the results of its MOU negotiations. The LWDA 8 has reached an agreement as to the MOU (including the local infrastructure funding mechanism component of the MOU) for **PY 21**.

Therefore, it is recommended that the LWDB Chairman, Chief Elected Official and our required Partners provide their signatures below to approve the agreement.

Signatures:

  
Local TRWDB Chairman

  
Chief Local Elected Official

**Comprehensive One-Stop Location  
Partner Contribution Amounts - Infrastructure Costs**

	<b>Comprehensive Griffin</b>
Total Infrastructure Costs	\$ 120,931.86
Total Square Footage of Facility	11,524
Annual Cost per Cubicle	\$ 1,140
Annual Cost per Office	\$ 2,138
<b>Partner Name</b>	
<b>Partners Co-Located at the Comprehensive One-Stop</b>	
Turner Job Corps ( 1 cubicles)	\$1,140
Georgia Vocational Rehabilitation (1/2 cubicle)	\$570
WIOA Title I Adult, DW & Youth Services (3 cubicles)	\$3,420
Georgia Department of Labor*	Remainder of Costs
<b>Partners with Electronic Access</b>	
Adult Education - Southern Crescent Technical College (1/5 cubicle)	\$228
Carl Perkins - Southern Crescent Technical College (1/5 cubicle)	\$228
Community Service Block Grant - CAFI (1/5 cubicle)	\$228
SCSEP - Legacy Link (1/5 cubicle)	\$228
SCSEP - Athens Community Council on Aging (1/5 cubicle)	\$228
<i>*GDOL Programs include: Jobs for Veterans State Grants, Trade Adjustment Assistance, Wagner-Peyser Employment Services &amp; Unemployment Insurance</i>	

**Affiliate One-Stop Location  
Partner Contribution Amounts - Infrastructure Costs**

	<b>Affiliate Carrollton</b>
Total Infrastructure Costs	\$ 115,722.59
Total Square Footage of Facility	8,888
Annual Cost per Cubicle	\$ 1,415
Annual Cost per Office	\$ 2,653
<b>Partner Name</b>	
<b>Partners Co-Located at the Comprehensive One-Stop</b>	
WIOA Title I Adult, DW & Youth Services (1 cubicle, 2 offices)	\$6,721
Georgia Department of Labor*	Remainder of Costs
<b>Partners with Electronic Access</b>	
N/A	
<i>*GDOL Programs include: Jobs for Veterans State Grants, Trade Adjustment Assistance, Wagner-Peyser Employment Services &amp; Unemployment Insurance</i>	

**Affiliate One-Stop Location  
Partner Contribution Amounts - Infrastructure Costs**

	<b>Affiliate LaGrange</b>
Total Infrastructure Costs	\$ 123,931.86
Total Square Footage of Facility	8,247
Annual Cost per Cubicle	\$ 1,624
Annual Cost per Office	\$ 3,045
<b>Partner Name</b>	
<b>Partners Co-Located at the Comprehensive One-Stop</b>	
WIOA Title I Adult, DW & Youth Services (2 cubicles)	\$3,248
Georgia Department of Labor*	Remainder of Costs
<b>Partners with Electronic Access</b>	
N/A	
<i>*GDOL Programs include: Jobs for Veterans State Grants, Trade Adjustment Assistance, Wagner-Peyser Employment Services &amp; Unemployment Insurance</i>	

### **Proposed Revised Infrastructure Rates for Three Rivers:**

Based upon actual infrastructure costs for FY 2020, we are proposing the revised infrastructure rates for the following Career Centers:

#### **Griffin Career Center – Comprehensive One-Stop**

**Cubicle: \$1,140 per year / \$95 per month. – Based on full-time occupancy of a 64 sq. ft. (8X8) average cubicle**

**Office: \$2,138 per year / \$178 per month – Based on full-time occupancy of a 120 sq. ft. (10X12) average private office**

#### **Carrollton Career Center**

**Cubicle: \$1,415 per year / \$118 per month. – Based on full-time occupancy of a 64 sq. ft. (8X8) average cubicle**

**Office: \$2,653 per year / \$221 per month – Based on full-time occupancy of a 120 sq. ft. (10X12) average private office**

#### **LaGrange Career Center**

**Cubicle: \$1,624 per year / \$135 per month. – Based on full-time occupancy of a 64 sq. ft. (8X8) average cubicle**

**Office: \$3,045 per year / \$254 per month – Based on full-time occupancy of a 120 sq. ft. (10X12) average private office**

The methodology of the square footage allocation is the same as last year: Total Expenses / Total Sq. Ft. = Cost per Sq. Ft.

The direct Sq. Ft. cost is increased by 30% for shared circulation costs (Direct Cost per Sq. Ft X 1.3); an amount confirmed as reasonable by the State Properties Commission (SPC).

This modified (Direct Cost per Sq. Ft X 1.3) charge per square foot is then multiplied by the direct square feet to be used by the partner. The GDOL federally approved indirect rate is then applied to this calculation to cover the costs associated with maintenance, property and contract management, as well as WIOA required invoicing and reconciliation.

If a partner will be in the One-Stop 20 hours a week or less, the costs of the cubicle or office can be divided in half.

Below, you will find the Revised Cost Sharing Chart and a chart showing the cost per sq. ft. calculation and break down.

### **Proposed Other Shared Costs:**

I have included the Other Shared Costs breakdown.





SHARED COST CATEGORY	TOTAL ANNUAL BUDGET	Funding Formula	ANNUAL BUDGET ALLOCATION TO PARTNERS								
			Title IB	Wagner - Peyser	Adult Education	Vocational Rehab	Perkins	SCSEP	Other Partner	Other Partner	
<b>Part 1: LAGRANGE Comprehensive One-Stop Center Infrastructure Costs West Central GA LWDA 8 - Affiliate - LaGrange CC</b>											
<b>Facilities Costs</b>	<b>Owned</b>										
Lease Cost											
Facility Maintenance	\$8,398.00										
Property and Casualty insurance	\$1,142.27										
Security Service	\$33,060.00										
Cleaning Services	\$11,520.00										
Utilities	\$29,465.04										
<b>Technology Costs</b>											
Telecommunications and Internet	\$39,673.20										
Equipment and technology costs											
Assistive technology											
<b>Common Identifier Marketing Costs</b>											
Signage											
Other "common identifier" costs											
<b>Other Infrastructure Costs</b>											
Other Cost Description											
Other Cost Description											
Other Cost Description											
<b>Total, Infrastructure Costs</b>	<b>\$123,258.51</b>										

### Cost per Sq. Ft. Calculation and Break Down

	One-Stop	Expenses	Sq. Ft.	\$\$/Sq. Ft.	30% Circ.	AS&T Indirect	Full Sq. Ft.	Cubicle Annual (64)	Cubicle Monthly	Office Annual (120)	Office Monthly
8	Three Rivers										
	Griffin	120,931.86	11,524	\$ 10.49	\$ 3.15	\$ 4.17	\$ 17.82	\$1,140.26	\$95.02	\$2,137.99	\$178.17
	Carrollton	115,722.59	8,888	\$ 13.02	\$ 3.91	\$ 5.18	\$ 22.11	\$1,414.75	\$117.90	\$2,652.66	\$221.06
	LaGrange	123,258.51	8,247	\$ 14.95	\$ 4.48	\$ 5.95	\$ 25.38	\$1,624.01	\$135.33	\$3,045.01	\$253.75

**OTHER SHARED COSTS:**

#	Salaries	Salary/H R	% of Time	Weeks/Hrs	Total	Program
2	DOL Services Specialist	\$ 15.47	100%	2080	\$ 32,178	\$ 64,356
	Job Code SSP090, PG F					
2	<b>Total # of Staff</b>	<b>Total Staff Salary and Wages</b>			<b>\$ 32,188</b>	<b>\$ 64,356</b>
2	<b>Staff Fringe Benefits (Total)</b>				<b>Total</b>	<b>Program</b>
	F.I.C.A.	7.65%	x		\$ 64,356	\$ 4,923
	Worker's Comp/UI	\$1,104.00	x		\$ 2	\$ 2,208
	Health/Welfare	29.45%	x		\$ 64,356	\$ 18,953
	Retirement/Pension	24.78%	x		\$ 64,356	\$ 15,947
	Other: Merit Assessment	0.132%	x		\$ 64,356	\$ 85
					<b>Total Staff Fringe Benefits</b>	<b>\$ 42,116</b>
<b>Explanation: The equivalent of 1 full-time SS works the front desk, and 1 full-time SS works the resource room.</b>					<b>Total Salaries/Fringe</b>	<b>\$106,472</b>

**Other Shared Costs:**

The services that are utilized by all of the partners in this region is the staffing associated with ushering a customer from the door of the center to the point of partner referral. These services are carried out by front desk and resource room staff. Those individuals have the job title of either service specialist or service specialist assistant. To ensure uniformity, GDOL will charge for these salaries based on the State of Georgia mid-point plus the state benefits package. The costs for "other shared costs" will be allocated to partners based on a usage methodology. The Department of Labor will calculate the amount of referrals that each partner receives from the common area staff at the Comprehensive One-stop through the CICS data system. Partners will be given reports regularly, and will be able to confirm their totals using their own data systems. The "other shared costs" total will then be divided by the percentage of referrals that a program receives. For example, if the center staff completed 100 referrals, and WIOA received 10 referrals, then WIOA would be responsible for 10% of the "other shared costs". Until the first quarter's reconciliation, we do not know the amount that each partner will be responsible for; however, we have calculated the total amount of "other shared costs" in the accompanying spreadsheet.

*The number of referrals made for each Partner will be calculated by DOL at the Comprehensive One-Stop. The Total Shared Cost will be divided by the percentage of referrals each program receives, this will be divided by the percentage of referrals each program receives, this will determine the amount each partner is responsible for.*

*In Kind Contributions may be used to offset the shared cost.*

*Third-party In-Kind contributions are contributions of space, equipment, technology, non-personnel services, or other like items by a non partner (i.e., a third party ) to support the infrastructure costs associated with one-stop operations. The value of third-party in-kind contributions must also be consistent with the Uniform Guidance at 2 CFR 200.306 and reconciled on a regular basis (i.e., monthly or quarterly) to ensure they are fairly evaluated and, if contributed on behalf of a particular program partner, meet the partner's proportionate share.*

**Attachment 4: Grievance Policy**

## WORKSOURCE THREE RIVERS GRIEVANCE AND COMPLAINTS PROCEDURE

### **GENERAL POLICY**

If any individual, group, or organization has a complaint, the problem should first be discussed informally between those involved before a grievance is filed. Applicants and Participants for services through the Workforce Innovation and Opportunity Act Title I (WIOA) paid for by the WorkSource Three Rivers and/or the Three Rivers Regional Commission Board will be treated fairly. Grievance/complaints should be filed in accordance with the written procedures established by WorkSource Three Rivers. Signed and dated grievance forms with accurate contact information are included in all participant case files. **If you believe you have been harmed by the violation of the Workforce Innovation and Opportunity Act or regulations of this program, you have the right to file a grievance/complaint.**

### **EQUAL OPPORTUNITY POLICY**

WorkSource Three Rivers adheres to the following United States law: It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity. References include: The Workforce Innovation and Opportunity Act of 2014 P. L. 113-128 USDOL Regulations Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act of 2014 29 C.F.R.§ 38.36 effective July 22, 2015.

### **Equal Opportunity Is the Law (29 C.F.R.§ 38.35)**

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases:

- Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity.

The recipient must not discriminate in any of the following areas:

- Deciding who will be admitted, or have access, to any WIOA Title I-financially assisted program or activity;
- providing opportunities in, or treating any person with regard to, such a program or activity; or
- making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

### **What to Do If You Believe You Have Experienced Discrimination**

If you think that you have been subjected to discrimination under a WIOA Title I-financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either:

The recipient's Equal Opportunity Officer (or the person whom the recipient has designated for this purpose); or

The Director, Civil Rights Center (CRC), U.S. Department of Labor, 200 Constitution Avenue NW. Room N-4123, Washington, DC 20210 or electronically as directed on the CRC Web site at [www.dol.gov/crc](http://www.dol.gov/crc).

If you file your complaint with the recipient, you must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above).

If the recipient does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient).

If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

A **complaint** is an allegation of discrimination on the grounds a person, or any specific class of individuals, has been or is being discriminated against on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, citizenship status, or participation in any WIOA Title I-financially assisted program or activity as prohibited by WIOA or part 29CFR38.69. An allegation of retaliation, intimidation or reprisal for taking action or participating in any action to secure rights protected under WIOA will be processed as a **complaint**.

### **COMPLAINTS OF DISCRIMINATION**

WorkSource Three Rivers is prohibited from, and does not engage in, discriminating against all individuals in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States or participation in any WIOA Title I financially assisted program or activity.

Both the complainant and the respondent have the right to be represented by an attorney or other individual of their choice. (29 C.F.R. § 38.71)

If you think that you have been subjected to discrimination under a WIOA-funded program or activity, you may file a complaint within **180 days** from the date of the alleged violation with the WorkSource Three Rivers as follows:

WIOA Equal Opportunity Officer, Mandy Nicholson,  
Three Rivers Regional Commission,  
P.O. Box 818, 120 North Hill Street, Griffin, GA, 30224,  
(770) 229-9799, [worksourcetr@threeriversrc.com](mailto:worksourcetr@threeriversrc.com)

### **OR**

Complaints may also be filed with the  
TCSG OWD Compliance Director  
1800 Century Place N.E., Suite 150, Atlanta, GA 30345  
Phone (404) 679-1371 Fax: (404) 679-5460 TTY/TDD 1-800-255-0056  
Submissions should be sent to [wioacompliance@tcsq.edu](mailto:wioacompliance@tcsq.edu)

### **OR**

A complainant may be filed directly with the Director,  
Civil Rights Center, U.S. Department of Labor,  
200 Constitution Avenue NW, Room N-4123, Washington, DC 20210.

Or at the website below:

<http://www.dol.gov/oasam/programs/crc/external-enforc-complaints.htm>

Furthermore, the USDOL Civil Rights Center provides a complaint form, which should be utilized, if sending a discrimination-based complaint, and can be found at the website detailed above.

Upon receipt of the complaint, if the WorkSource Three Rivers WIOA Equal Opportunity Officer determines that it does not have jurisdiction over a complaint, it must notify the complainant, in writing within five business days of making such determination.

This Notice of Lack of Jurisdiction must include:

- (a) A statement of the reasons for that determination; and
- (b) Notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the complainant receives the Notice.

The Technical College System of Georgia, Office of Workforce Development or WorkSource Three Rivers under this part and WIOA Section 188 will process complaints and it will contain the following elements:

- (1) Initial, written notice to the complainant that contains the following information:
  - (i) An acknowledgment that the recipient has received the complaint; and
  - (ii) Notice that the complainant has the right to be represented in the complaint process
  - (iii) Notice of rights contained in [§ 38.35](#); and
  - (iv) Notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated into the non-English languages as required in §§ [38.4\(h\)](#) and (i), [38.34](#), and [38.36](#).
- (2) A written statement of the issue(s), provided to the complainant that include the following information:
  - (i) A list of the issues raised in the complaint; and
  - (ii) For each such issue, a statement whether the recipient will accept the issue for investigation or reject the issue, and the reasons for each rejection.
- (3) A period for fact-finding or investigation of the circumstances underlying the complaint.
- (4) A period during which the recipient attempts to resolve the complaint. The methods available to resolve the complaint must include alternative dispute resolution (ADR).
- (5) A written Notice of Final Action, provided to the complainant within 90 days of the date on which the complaint was filed, that contains the following information:
  - (i) For each issue raised in the complaint, a statement of either:
    - (A) The recipient's decision on the issue and an explanation of the reasons underlying the decision; or
    - (B) A description of the way the parties resolved the issue; and
  - (ii) Notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the Notice of Final Action is received if the complainant is dissatisfied with the recipient's final action on the complaint.

The complainant has the option to resolve the complaint using alternative dispute resolution of their choice. The ADR procedures must provide:

- (1) The complainant may attempt ADR at any time after the complainant has filed a written complaint with the recipient, but before a Notice of Final Action has been issued.
- (2) The choice whether to use ADR or the customary process rests with the complainant.

(3) A party to any agreement reached under ADR may notify the Director in the event the agreement is breached. In such circumstances, the following rules will apply:

- (i) The non-breaching party may notify with the Director within 30 days of the date on which the non-breaching party learns of the alleged breach; and
- (ii) The Director must evaluate the circumstances to determine whether the agreement has been breached. If the Director determines that the agreement has been breached, the complaint will be reinstated and processed in accordance with the recipient's procedures.

(4) If the parties do not reach an agreement under ADR, the complainant may file a complaint with the Director as described in §§ 38.69 through 38.71.

**Each complaint must be filed in writing, either electronically or in hard copy, and must contain the following information:**

- (a) The complainant's name, mailing address, and, if available, email address (or another means of contacting the complainant).
- (b) The identity of the respondent (the individual or entity that the complainant alleges is responsible for the discrimination).
- (c) A description of the complainant's allegations. This description must include enough detail to allow the Director or the recipient, as applicable, to decide whether:
  - (1) CRC or the recipient, as applicable, has jurisdiction over the complaint
  - (2) The complaint was filed in time; and
  - (3) The complaint has apparent merit; in other words, whether the complainant's allegations, if true, would indicate noncompliance with any of the nondiscrimination and equal opportunity provisions of WIOA or this part.
- (d) The written or electronic signature of the complainant or the written or electronic signature of the complainant's representative.
- (e) A complainant may file a complaint by completing and submitting CRC's Complaint Information and Privacy Act Consent Forms, which may be obtained either from the recipient's EO Officer or from CRC. The forms are available electronically on CRC's Web site, and in hard copy via postal mail upon request. The latter requests may be sent to CRC at the address listed in the notice contained in § 38.35.

If the recipient issues its Notice of Final Action before the 90-day period ends, but the complainant is dissatisfied with the recipient's decision on the complaint, the complainant or the complainant's representative may file a complaint with the Director within 30 days after the date on which the complainant receives the Notice. (§38.75)

If the recipient, has failed to issue a Notice of Final Action by the end of 90 days from the date on which the complainant filed the complaint, the recipient, the complainant or the complainant's representative may file a complaint with the Director within 30 days of the expiration of the 90-day period. In other words, the complaint must be filed with the Director within 120 days of the date on which the complaint was filed with the recipient. (§38.76)

Upon receipt of the complaint, if the WorkSource Three Rivers WIOA Equal Opportunity Officer determines that it does not have jurisdiction over a complaint, it must notify the complainant, in writing within five business days of making such determination.

This Notice of Lack of Jurisdiction must include:

- (a) A statement of the reasons for that determination; and
- (b) Notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the complainant receives the Notice.

WorkSource Three Rivers will offer full cooperation with any local, state, or federal investigation in accordance with the aforementioned proceedings, or with any criminal investigation.

## **COMPLAINTS OF FRAUD, ABUSE OR OTHER ALLEGED CRIMINAL ACTIVITY**

In cases of suspected fraud, abuse or other alleged criminal activity, you should direct your concerns to the Office of Inspector General, U.S. Department of Labor, at 1-866-435-7644. There is no charge for this call.

## **COMPLAINTS AGAINST PUBLIC SCHOOLS**

If the complaint is not resolved informally and it involves public schools of the State of Georgia, the grievance procedure will comply with WIOA and OCGA 20-2-1160.

## **ALL OTHER COMPLAINTS (VIOLATIONS OF THE ACT OR REGULATIONS)**

### GENERAL GRIEVANCE POLICY

Individuals applying for or receiving services through the Workforce Innovation and Opportunity Act Title I (WIOA) paid for by WorkSource Three Rivers and/or the Three Rivers Regional Commission Board will be treated fairly. If any individual, group or organization has a complaint, the problem should first be discussed informally between those involved before a grievance is filed. Grievances should be filed in accordance with the written procedures established by WorkSource Three Rivers. **If you believe you have been harmed by the violation of the Workforce Innovation and Opportunity Act or regulations of the program, you have the right to file a grievance.**

A **grievance** is a complaint about customer service, working conditions, wages, work assignment, etc., arising in connection with WIOA Title I funded programs operated by WIOA recipients including service providers, eligible training providers, one-stop partners and other contractors.

### **FILING A GENERAL GRIEVANCE (violations of the act or regulations not alleging discrimination)**

Who May File: Any person, including WIOA program participants, applicants, staff, employers, board members or any other interested parties who believes they have received unfair treatment in a WIOA Title I funded program.

Any person may attempt to resolve all issues of unfair treatment by working with the appropriate manager and/or supervisor and staff member, service provider, or one-stop partner involved informally prior to a written grievance being filed.

All complaints as described in the previous definition may be filed within one hundred twenty (120) days after the act in question by first completing and submitting a **written** statement or completing the General Grievance Form to:

**WIOA Equal Opportunity Officer, Mandy Nicholson,  
Three Rivers Regional Commission  
P.O. Box 818  
120 North Hill Street  
Griffin, GA. 30224**

### **The written statement must include:**

- A. The full name, telephone number, email (if any), and address of the person making the complaint.
- B. The full name, address and email of the person or organization against whom the complaint is made.
- C. A clear but brief statement of the facts including the date(s) that the alleged violation occurred, including the identification of all relevant parties.
- D. Relief requested.
- E. Complainant's signature and date.

For the grievance submission form, see website: <http://www.threeriversrc.com>

A complaint will be considered to have been filed when WorkSource Three Rivers receives from the complainant a written statement, including information specified above which contains sufficient facts and arguments to evaluate the complaint.

Upon receipt of the complaint, if the WorkSource Three Rivers WIOA Equal Opportunity Officer determines that it does not have jurisdiction over a complaint, it must notify the complainant, in writing within five business days of making such determination.

This Notice of Lack of Jurisdiction must include:

- (a) A statement of the reasons for that determination; and
- (b) Notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the complainant receives the Notice.

Upon receipt of the complaint, the WorkSource Three Rivers WIOA Equal Opportunity Officer will initiate efforts with the complainant and others involved bringing about a resolution as soon as possible. This will include a meeting of all parties with the hope of reaching a mutually satisfactory resolution. If the complaint has not been resolved to the satisfaction of the complainant within thirty (30) days, the WorkSource Three Rivers WIOA Equal Opportunity Officer will arrange appointment of a hearing officer to conduct a hearing for settlement of the complaint to be held within sixty (60) days of grievance filing.

## Hearing Process

A hearing on any complaint filed shall be conducted as soon as reasonably possible, but within sixty (60) days of the complaint's filing. Within ten (10) business days of the receipt of the request for a hearing, WorkSource Three Rivers shall: (1) respond in writing acknowledging the request to the grievant; and (2) notify the grievant and respondent of a hearing date. The notice shall include, but not limited to: (1) date of issuance; (2) name of grievant; (3) name of respondent against whom the complaint has been filed; (4) a statement reiterating that both parties may be represented by legal counsel at the hearing; (5) the date, time, place of the hearing, and the name of the hearing officer; (6) a statement of the alleged violation(s) of WIOA ; (7) copy of any policies and procedures for the hearing or identification of where such policies may be found; and (8) name, address, and telephone number of the contact person issuing the notice.

The hearing shall be conducted in compliance with federal regulations. The hearing shall have, at a minimum, the following components: (1) an impartial hearing officer selected by WorkSource Three Rivers; (2) an opportunity for both the grievant and respondent to present an opening statement, witnesses, and evidence; (3) an opportunity for each party to cross-examine the other party's witnesses; and (4) a record of the hearing which WorkSource Three Rivers shall create and maintain.

The hearing officer, considering the evidence presented by the grievant and respondent, shall issue a written decision, which shall serve as WorkSource Three Rivers' official resolution of the complaint. The decision shall include the following information: (1) the date, time, and place of hearing; (2) a recitation of the issues alleged in the complaint; (3) a summary of any evidence and witnesses presented by the grievant and respondent; (4) an analysis of the issues as related to the facts; and (5) a decision addressing each issue alleged in the complaint.

No applicant, participant, employee, service provider or training provider will be intimidated, threatened, coerced or discriminated against because he/she made a complaint, testified, assisted or participated in any manner in an investigation, proceeding or hearing.

If the complainant(s) does not receive a written decision from the Hearing Officer within sixty (60) days of grievance/complaint filing, or receives a decision unsatisfactory to the complainant(s), the complainant(s) then has/have a right to request a review by the State using the WIOA Complaint Information Form found at:

<https://tcsgeu/worksource/resources-for-practitioners/eo-and-grievance-procedure-information/>

TCSG OWD Compliance Director  
1800 Century Place N.E., Suite 150,  
Atlanta, GA 30345  
Phone: (404) 679-4970  
FAX: (404) 679-5460

The Assistant Commissioner shall act as the Governor's authorized representative. Either an informal resolution or a hearing will take place within 60 calendar days of the filing.

### Appeal Process

An appeal to WFD of a LWDA's resolution must be filed within sixty (60) days of the date the LWDA issued its written resolution. However, a LWDA that fails to issue a written resolution of a locally filed Complaint within sixty (60) days shall give the Complainant the automatic right to file a Complaint with WFD. Once WFD has received the Complaint form and the local resolution, WFD shall issue its own resolution on the issue being appealed within sixty (60) days of receipt. Any resolution reached by WFD may be appealed to the United States Department of Labor's Employment and Training Administration.

**I CERTIFY THAT I HAVE RECEIVED A COPY OF THIS POLICY AND PROCEDURES AND UNDERSTAND THE INFORMATION PROVIDED WITHIN THIS DOCUMENT.**

\_\_\_\_\_  
**PARTICIPANT NAME (PRINT)**

\_\_\_\_\_  
**DATE**

\_\_\_\_\_  
**PARTICIPANT NAME (SIGN)**

\_\_\_\_\_  
**DATE**

\_\_\_\_\_  
**Parent/Legal Guardian  
Signature** (if under 18)

\_\_\_\_\_  
**DATE**

**Attachment 5: Signature Page**

