



December 7, 2016

Dear Director Lovett,

The Local/Regional plan for Area 18 has been conditionally approved by the Georgia Department of Economic Development's Workforce Division (WFD). The final approval of the plan is contingent upon completion of the revisions/additions requested in this letter.

Local/Regional plans were reviewed during October - November 2016 by multiple WFD staff members. Comments regarding plan improvements are attached. WFD staff are available for technical assistance calls related to the requested revisions/additions. Please contact Janice Davis at jdavis@georgia.org to schedule a time for a technical assistance call.

All requested revisions/additions should be submitted to WFD no later than the close of business on March 3, 2017. Revisions/additions should be made to the original document and noted as such. Plan revisions/additions do not require reposting for public comment. A plan submittal letter should contain a narrative description detailing that all plan improvements were made as requested and have been approved by the Local Workforce Development Board.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Hames', with a stylized flourish at the end.

Ben Hames
Deputy Commissioner
Georgia Department of Economic Development's Workforce Division

cc: LWDB Chair
cc: CLEO

Plan Topic		Edits Requested
1	Identification of Fiscal Agent	
	Does the plan provide an identification of the entity responsible for the disbursement of grant funds as determined by the chief elected official?	
2	Description of Strategic Planning Elements	
a	Does the plan 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? Does the plan include the listing of occupations in demand within the region and describe how the list was developed, citing source data?	This plan section utilizes the GDOL “occupations showing most annual openings” as the occupation in-demand listing. Is there a specific demand occupations listing that was approved for the region? If not, each LWDA should prepare a demand occupations listing to be included in the plan and to serve as the framework for training services for participants. There is no mention or indication of a Burning Glass demand occupations listing.
b	Does the plan 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?	
c	Does the plan 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 skills levels of the workforce in the region, including individuals with barriers to employment? Does the plan list all data sources used to gather this information?	
d	Does the plan 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 plan does not include a thorough analysis of workforce activities for the region, including education and training. The plan should include a description of the types of programs and services available at additional partner agencies, including the Technical College System of Georgia, in the analysis of workforce development

		activities in the region. After inclusion of the additional community workforce partners, the analysis of strengths and weaknesses and capacity of such services should be evaluated and included.
e	Does the plan 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?	The plan does not include specific goals related to performance accountability measures or barriers to employment.
f	Does the plan provide a strategy to coordinate core programs to align resources available to the local area to achieve the strategic visions and goals?	
3	Description of Strategies and Services	
a	Does the plan describe how the area will engage employers in workforce development programs, including small employers and employers in in-demand industry sectors and occupations?	
b	Does the plan describe how the area will support a local workforce development system that meets the needs of businesses in the local area? Does it discuss the area's workforce services to businesses and how business and organized labor representatives on the LWDB contributed to the development of these strategies? Does the plan provide a listing on business services available through the areas such as employer workshops and assessment and screening of potential employees?	
c	Does the plan describe how the area will better coordinate workforce development programs and economic development, as well as identify economic development partners and describe their involvement of the economic development community in developing strategies?	

d	Does the plan discuss how the area will strengthen linkages between the one-stop delivery system and unemployment insurance programs?	
4	Regional Service Delivery (Only applies to regions that encompass two or more local areas.)	
a	Does the plan describe the plans for the establishment of regional service delivery strategies, including the use of cooperative service delivery agreements?	
b	Does the plan describe the plan for coordinating the administrative cost arrangements, including the pooling of funds for administrative costs?	
5	Sector Strategy Development	
a	Does the plan describe the partners that are participating in sector strategy development?	
b	Does the plan describe the meetings that have taken place and the strategy by which partners will continue to be engaged?	
c	Does the plan describe the research and the data that was used to identify the sector that was chosen for the sector strategies training?	
d	Does the plan provide a completed outline of the sector strategy for the previously identified sector that includes the following details: participating employers, target occupations, training programs, and target populations?	
e	Does the plan describe the plans for future strategy development for future sectors and, if applicable, discuss the next sectors to be targeted?	
6	Description of the One-Stop Delivery System	
a	Does the plan 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?	

b	Does the plan describe 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?	
c	Does the plan 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 regarding the physical and programmatic accessibility of facilities, programs and services, technology and materials for individuals with disabilities? Does it include the provision of staff training and support and address the needs of individuals with disabilities?	
d	Does the plan provide a comprehensive description of the roles and resource contributions of the one-stop partners?	
e	Does the plan 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? Does it describe how market research, requests for information and conducting a cost-and-price analysis are being conducted as part of preparation?	
7	Awarding Sub-grants and Contracts	
	Does the plan 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 Title I?	1. Small-Purchases policy states that it is to be used for purchases between \$3,001 and \$25,000. It continues to state that at least three bids should be obtained if the price is expected to be above \$100. This \$100 cap conflicts with the Micro-Purchase policy which allows purchases under \$3,000 to occur without the solicitation of competitive quotes. Please review and correct.
8	EEO and Grievance Procedures	
	Does the plan describe local procedures and staffing to address grievances and complaint resolution?	1. Citation correction - Part 38, not Part 37. Part 37 governed WIA. 2. Paragraph 2 is outdated and incorrect.

		Please reference WFD's current Grievance and Complaint Process Policy in WFD's P&P. 3. Please distinguish the general complaint process from the EO complaint process.
9	Local Boards	
a	Does the plan provide a description of how local board members are identified and appointed? Does it include a description of how the nomination process occurs for adult education and labor representatives?	
b	Does the plan describe the area's new member orientation process for board members?	
c	Does the plan 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)?	
d	Does the plan describe how local board members are kept engaged and informed?	
10	Local Board Committees	
	Does the plan provide a description of board committees and their functions?	
11	Plan Development	
	Does the plan 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? Does it also describe the process used by the local board to provide a 30-day comment period prior to submission of the plan including an opportunity for public comment, including comment by representatives of business and comment by representatives of labor organizations, representatives of education, and input into the development of the local plan?	
12	Expanding Service to Eligible Individuals	

	Does the plan 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? Does it 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?	
13	Description of Service to Adults and Dislocated Workers	
	Does the plan provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area?	
14	Description of Rapid Response Services	
	Does the plan provide a description of how the local board will coordinate workforce development activities carried out in the local area with statewide rapid response activities?	
15	Description of Youth Services	
	Does the plan 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? Does this description and assessment include an identification of successful models of such youth workforce development activities?	
16	Implementation of Work-Based Learning Initiatives	

	Does the plan 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 plan states the region is “considering OJT option”. There is no description of or policies for incumbent worker or customized training. Please revise to include.
17	Provision of ITAs	
	Does the plan provide a description of how training services outlined in WIOA § 134 will be provided through the use of ITAs? If the training services will be used, does it 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?	
18	Entrepreneurial Skills Training and Microenterprise Services	
	Does the plan provide a description of how the area will coordinate and promote entrepreneurial skills training and microenterprise services?	The plan describes entrepreneurial training for youth only. There should be a relationship and referral mechanism for the Small Business Administration. Please revise to include.
19	Coordination with Education Programs	
	Does the plan 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?	There is no description of how the region will coordinate with education – The plan simply restates question.
20	Description of Supportive Services	

	Does the plan 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? Does it describe the coordination of transportation and other supportive services regionally, if applicable? Does it include the region/local area Supportive Service Policies?	
21	Description of the Workforce System	
	Does the plan 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? Does this include programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 USC 2301 et seq.)?	The Plan does not include programs of study authorized under the Carl Perkins CTAE Act.
22	Coordination with Wagner-Peyser	
	Does the plan 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 US 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?	
23	Coordination with Adult Education	
	Does the plan 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?	
24	Coordination with Vocational Rehabilitation	

	Does the plan 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?	
25	Description of Performance Measures	
	Does the plan 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?	This plan version does not include the negotiated performance measures.
26	One-Stop System Performance and Assessment	
	Does the plan provide a listing of locally/regionally developed one-stop performance standards and describe the criteria used to develop performance?	
27	ETPL System	The LWDA needs to update ETPL policies and procedures to comply with P&P revisions and add RA procedures (Statement LWDA will comply if received not sufficient). The plan provides no descriptions except attached ITA policies.
a	Does the plan provide a description of the public notification to prospective providers?	
b	Does the plan 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?	
c	Does the plan provide a description of the formal appeals process for aggrieved ITA customers and providers of unapproved training programs?	The ETP appeals policy needs to be addressed (not same as the WIOA grievance policy).

d	Does the plan 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 plan should include more detail on how to ensure updated provider information on the ETPL.
e	Does the plan provide a description of any regional policies or agreements for ITAs or training providers?	
f	Does the plan provide a description of the process to track and manage all ITA activity?	Managing and tracking ITAs is not described in ITA policies. A description including use of GWROPP and financial tracking should be included.
g	Does the plan 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.)?	
h	Does the plan provide a description of how registered apprenticeship programs are added to the ETPL?	The plan should address RA procedures as described in the WFD P&P.
28	Implementation of Technology	
	Does the plan 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?	
29	State Branding	
	Does the plan provide a description for how the area will adopt and utilize the state brand?	
30	State Initiatives	
	Does the plan describe how the area will coordinate with WFD state initiatives, including: Go Build Georgia, Operation: Workforce, WorkSmart Georgia, and the High Demand Career Initiative?	Please provide a detailed narrative regarding coordination.
31	Special Population	
	Does the plan describe how the area will provide services to the special populations specified in the state plan, to include ex-offenders, veterans, at-risk youth, long-term unemployed, adult learners, and individuals with disabilities? Does the region's plan list any additional target groups?	
32	Priority of Service	

	Does the plan describe how the region will identify and administer the state's priority of service policy? Does the region identify if they will add target populations in addition to one's specified by state and federal policy?	
33	Attachment 1	
	Did the LWDA include a Local Workforce Development Board Member Listing?	
34	Attachment 2	
	Did the LWDA include PY16 and PY17 local negotiated performance goals?	Please revise to include negotiated performance measures.
35	Attachment 3	
	Did the LWDA include any comments that express disagreement? (Not required)	
26	Attachment 4	
	Did the LWDA properly fill out and submit a signature page?	