

Attachment A



WIOA Local 4-Year Plan Template

Please use this document as a template, providing a comprehensive response to each of the questions listed. If information is contained in an attachment, please label and reference it clearly.

(a) **Strategic Planning elements, including:**

(1) **A regional (local) analysis of:**

- (i) **Economic conditions including existing and emerging in-demand industry sectors and occupations; and**

The North Central Massachusetts region became a major force in the development of machine-powered manufacturing through the start of the 20th century centered on the abundant water power of our rivers and streams. This rise of manufacturing, however, has given way to other industries over the past fifty years.

Healthcare, retail, and human services industries have grown to take a larger role as manufacturing, especially traditional manufacturing, has faded. In the recent past, state and local officials have made a concerted effort to invest in the life-sciences industry and have had success in attracting bio-tech/bio-medical companies to the North Central region and supporting the growth of new life- science firms.

In terms of employment rates, the North Central MA region continues to mirror the state as a whole economically; our region's unemployment rate is a bit higher than the state 3.5% and hovers around 4% -- a low rate by historical standards.

- (ii) **Employment needs of businesses in existing and emerging in-demand industry sectors and occupations.**

There are two identified demographic trends in the North Central MA region that appear to have a large impact on our workforce. The first is our aging population which is already having an impact in several industries, including manufacturing and other "traditional" trades. Many of the older, more experienced workers are retiring and this is leaving gaps that are proving difficult

for employers to fill as younger workers are not choosing to enter these fields in numbers sufficient to the need. For example, there are a significant number of maintenance mechanics and machine operator positions that will be available as the current workforce retires in the next 3-5 years. Without new candidates to replace these workers, the shortage will grow critical, jeopardizing the ability of these companies to meet customer demand. Similarly, diesel technicians, construction workers, and other “hard-trades” appear to be of less interest to many youth. Evidence suggests that youth are counseled from an early age to pursue a traditional four year college instead of training in a hands-on profession that is not aligned with the degree-track academic system. Beyond this, it would appear that many youth seek jobs that offer more social rewards, aka, a higher level of perceived social status.

Additionally, we are seeing an aging workforce that is not equipped with the appropriate skill set to work in a technology-rich workplace, such as advanced manufacturing. For instance, many older workers/job seekers are not familiar with Computer-Numeric Control (CNC) machining, which is becoming the norm within the manufacturing industry. CNC machining is an automated process and requires knowledge of software and programming. While we have already completed a large amount of CNC training in our region, we will need to do more in order to upskill our aging existing workers and prepare our younger workforce.

(iii) As appropriate, your local area may use an existing analysis, which is a timely current description of the regional economy, to meet the requirements of paragraphs (a)(1)(i) and (ii) of this section;

Regional plan information may be used as applicable to the local area. However, local analysis that yields information that is not in the regional plan should be included in this response. (Please see 21 d).

According to the 2018 North Central Massachusetts Economic Outlook Survey, 61% of the 200 local CEOs surveyed thought the economy in the next 12 months stay the same as current conditions while 39% felt it would be in somewhat better shape as of today. 16% cited lack of skilled labor as the single greatest threat to the economy of the region, and 20% see it as the most challenging issue they expect to face in the next two years. This employer feedback reinforces the need to identify and address skill and labor gaps in the region. A small focus group of North Central MA Manufacturing executives projected about 15% increases over the next few years in both production and hiring, with the need for entry level and skilled labor to support those hiring goals.

(2) Describe the knowledge and skills needed to meet the employment needs of the businesses in your region, including employment needs in in-demand industry sectors and occupations.

Occupational Group 1: Health Occupations

*Certified Nursing Assistant, LPN, RN, Pharmacy Tech and Direct Care Worker
High employer need and engagement, low educational barrier for some career pathway entries, strong wages for higher level occupations (\$82,000 RN average)*

Supply and demand ratio of qualified candidates to demand for these occupations also indicate high need (CNA has .63 qualified candidates for each opening, Pharmacy Technician .23, LPN .65, and RN just .05)

Occupational Group 2: Manufacturing Occupations

*CNC Machinist, Quality Control Technician, Production Worker
High employer need (22,000+ short term openings) and engagement, good average wages - especially with experience (\$39,900 sector average), and a fairly low educational barrier. The number of machinists is anticipated to grow by 7.76% in the Central MA Workforce Development Area and 9.13% in the North Central WDA by 2024, fueled by the anticipated need to replace existing workers due to retirement.*

Occupational Group 3: Professional, Scientific, and Technical Services Occupations

*Software/Web Developer, Cyber Security, Bio-manufacturing Technicians
High anticipated growth, strong wages (Web Developers earn a mean annual salary of \$108,401 according to job postings for the Worcester Metropolitan Statistical Area on Burning Glass; Bio-manufacturing technicians earn an average annual wage of \$44,900 according to the US Bureau of Labor Statistics) the supply to demand ratio indicates a large gap in web developers as there are only .12 qualified candidates for each opening in this field. The Life sciences employment field is anticipated to grow by 5.68% by 2024 in the Central MA WDA.*

Occupation Group 4: Transportation, Warehousing and Logistics Occupations

*Commercial Drivers; Diesel Technicians
High employer need and engagement, good wages (\$34,300 average for Class-B; \$53,200 for Diesel Tech), low educational barrier, strong pool of candidates
The supply to demand ratio indicates there are only .29 qualified candidates for each heavy truck driver opening in this field (.37 for light truck drivers), and .51 candidates for each Diesel Technician position.*

Occupational Group 5: Construction Occupations

HVAC Mechanics, Apprenticeship Trade Occupations

High employer need, strong wages (HVAC - \$55,500; Building Trades - \$52,700), low educational barrier, large pool of candidates. Apprenticeship trade occupations offer employees a nationally-recognized credential supported through paid hands-on work and related training instruction (RTI) The supply to demand ratio indicates there are only .73 qualified candidates for each HVAC opening.

- (3) Please provide an analysis of your regional workforce, including current labor force employment and unemployment data, information on labor market trends, and educational and skill levels of the workforce, including individuals with barriers to employment¹.**

At 3.9 percent, the unemployment rate is the lowest it has been, with the state's seasonally adjusted unemployment rate dropping from 3.5 percent in June 2018. There are 142,146 workers in the North Central labor market with 136,672 currently employed. This leaves 5,474 unemployed. The Commonwealth's June unemployment rate remains lower than the national rate of 4.0 percent reported by the Bureau of Labor Statistics.

There are numerous high level industry trends occurring in our region that are impacting workforce needs, such as the rise of technology and automation, changes to business operations and management practices, issues involving the “pay squeeze” for some industries, and employer responses to public policy changes. Increasing technology and automation has been a major driving trend in our region, like others throughout the Commonwealth and beyond. Technology has always impacted workforce in a variety of ways and continues to do so today. In the past, new technology such as the harnessing of electricity provided power to factories and freed them from the need to be near the rivers which drove the machinery. Gas motors forever changed the way we transport goods and materials – and changing the mix of workers needed to build and maintain the new automobiles and trucks, and the roads they ride on. Today, we see the rise of automated manufacturing, self-checkout kiosks in markets and gas stations, and now the growth of the “gig economy” made possible by the use of real-time online platforms. This rise in technology has reduced the need for employees doing lower-level, repetitive functions, and so, teen employment has dropped as a result. The gig-economy allows people the freedom to pick and choose when and how they wish to offer their services, but the work comes with little or no benefits, job security, or growth potential – an Uber driver is unlikely to advance up the company ranks. In Information Technology, project-based gig work may be well paying, but comes with the stress of not knowing what work may be available in the future, and workers are more and more competing with talent based overseas since production can be shared seamlessly over the world-wide web.

Automation in the manufacturing sector is creating greater efficiencies for manufacturers and yielding ever-higher productivity as companies are able to produce more goods with less workers, leading to layoffs in this industry. Unfortunately for employers, they are in a race with a generational shift as older workers begin to retire in greater numbers, overwhelming their ability to replace these aging workers with machines. The jobs that remain in advanced manufacturing require ever more comfort with the use of computers to interface with the new machines on the shop floor. Our vocational-technical high schools are already attempting to address this need by adding programs in engineering, advanced manufacturing and robotics, but not at a high enough scale to prepare the number of workers necessary to replace the existing workforce preparing to retire. Further, a significant number of the students attending these schools are going off to college after graduation, and not directly to our region's manufacturers.

In the transportation industry there has been significant research on the development of autonomous (so called driver-less) vehicles and discussion in the workforce development world regarding the disruption this will have upon employment as drivers. Discussions with local distribution industry professionals indicate that this innovation is many years away from having an impact locally – while the technology may be rapidly advancing, the prohibitive cost of buying and maintaining an autonomous delivery truck will prevent wide scale implementation and any noticeable decline in local jobs driving. More imminent, these professionals suggest, is the greater utilization of automation in the sorting, handling, and preparation of products as they move through the distribution network. Beyond the short term, it is anticipated that delivery trucks, even autonomous ones, will still need a human presence on board for the foreseeable future to ensure the safe handling and delivery of goods and material.

Changes to business operations and management practices

Another high level industry trend that is affecting workforce development is the changing management structures that businesses utilize, such as the rise of outsourcing for much non-core business administrative and support services like human resources, payroll processing, marketing, custodial/janitorial services, etc. Businesses have also turned to the use of third-party temp firms to fill short term employment needs or for greater screening for identifying qualified candidates for “permanent” status as a company employee. Businesses have increasingly turned to these alternate organizational models in order to achieve greater efficiency, however, they have also had some unintended consequences, including a lowering of business reputations in the community-labor pool, and a decrease in the ability to promote from within as talented entry level support staff learn about the business and further advance their careers through company-sponsored education and professional development.

One more trend in our region is that employers have been caught in a “pay squeeze” affecting their ability to pay workers more in times of greater employee demand; unfortunately, we are seeing across some of our priority industries such as manufacturing, health care and social assistance that salaries are not increasing at a rate keeping up with the demand (for instance, manufacturing saw a 2.95% increase in total wages over the past 10 year period and health care an increase of 4.99% total wages, both below the regional average for all industries of 7.82% and far lower than the increased hiring demand would anticipate). One possible reason for this is that while the Commonwealth has increased minimum wage over the past three years, the ability of the employers to pay their workers a higher wage relative to the minimum wage is being capped by the funding available on the revenue side. In health care, this is largely a result of a public reimbursement system that caps the rate of funding and therefore leaves the revenue side flat while employers in other industries around them (including fast food and retail) have increased their pay due to the minimum wage increase mandate. This is also occurring in child development centers where staff pay rates are highly dependent on the public voucher supports available to the Centers for the moderate and low- income families they serve. Without a raise in the voucher rates, paying staff more is a very difficult proposition. Similarly, local manufacturers have faced pressure from their customers to meet the prices of their competitors, many of which are in countries with much lower pay rates, such as China. This pay-cap issue therefore alters the natural labor- market and the increase in pay expected in order to entice more people to seek employment in that field – especially if the work requires an investment in a potential candidate’s time and money for training in order to be qualified for the job(s) available. This, in and of itself, has large implications for the public workforce system, as it suggests increased training alone may not be sufficient to meet the demand.

As noted previously, the industrial base of the North Central MA region has shifted the past several decades from a largely manufacturing focused economy to one that is more balanced between industry sectors, including manufacturing, healthcare, education, professional services, and retail. While this shift has meant less dependency upon a single industry sector, it has also meant the loss of many family-supporting wage jobs for those with limited formal education.

There continues to be a rising need for health care workers at most levels of clinical services and at a variety of health care providers, including community health centers and patient triage clinics, long term care facilities, and hospitals. According to the US Census Bureau’s Longitudinal Employer-Household Dynamics – Quarterly Workforce Information Explorer platform, this equates to an increase over the past seven years of 13,500 employees in our region (60,266 to 73,576). During this same timeframe, educational services (including teachers and teacher assistants) has grown nearly seven thousand employees (from 33,672 to 40,553), the food and accommodation sector has

seen a growth of more than 2,100 employees (24,559 to 26,700), construction 2,300 employees (13,016 to 15,839), transportation and warehousing has grown more than 1,600 positions (9,526 to 11,212), while professional, scientific and technical services has grown from 14,386 to 15,209. Manufacturing has been rather flat overall with an additional 900 employees (35,396 to 36,302) but is expecting a large number of retirements in the next several years due to the average age of its existing workforce, and retail has fallen slightly from 38,337 to 38,200, yet remains one of the largest employment sectors in our region, especially for those with limited formal education or credentials.

One sector we are seeing significant growth is the life sciences sector. Fortunately, with four public institutions of higher education in our region offering training/education to prepare people for careers at various levels of this growing sector, we are well positioned to take advantage of this opportunity.

The most significant broad labor challenges facing the region over the next five years are:

- Aging workforce
- Lack of employment readiness & social/emotional skills
- Increase in share of workforce needing English skills
- Limited transportation

Aging workforce

Based on our recent employer survey, the most significant challenge facing our businesses is finding and retaining talent. Employers report the loss of older workers as they retire is creating larger supply gaps within our priority industries and this is bolstered by the data of our region's workforce (25.5%) is aged 55 or older. The added challenge is that these workers are often the most experienced so when they retire, it is difficult to replace them with workers with the same level of knowledge and skill set.

Lack of employment readiness & social/emotional skills

Employers also report that they often see job candidates and new hires that do not have the necessary "soft-skills" needed for performance in the workplace. These skills include time management, communication, social-emotional awareness, and

teamwork. Complicating this challenge is the fact that these skills are hard to measure and also difficult to teach in a classroom setting.

Lastly, the regional demographic trends indicate that the region's population growth has been fueled by net inflow of New Americans (immigrants, refugees). Over the past decade, the share of foreign born residents has grown by 8%, and the percent of residents in the region of Hispanic ethnicity has grown by 14%. This inflow of New Americans includes a significant portion that have limited English communication skills. Regionally, it is reported that 8% of residents have limited English proficiency. In order to overcome their barriers to employment, this population typically requires remedial services in English Speakers of Other Languages (ESOL) and/or Adult Basic Education (ABE) classes. Depending upon their past work experience may also need occupational training prior to being hired. A small percentage of our immigrant/refugee population may arrive highly skilled but non-credentialed here in U.S. They may also be faced with a language barrier and/or a need for an additional certification or credential before being hired. Unfortunately, the current wait list for enrollment into ESOL classes is more than 1,000 and funding for additional classes is limited. Further expanding this trend is the recent arrival of more than 600 evacuees from Puerto Rico now living in the Central MA region. At this time, many have not declared their intention to stay, but given their limited English proficiency, additional ESOL resources will be necessary.

Limited Transportation

The North Central MA area contains a few cities, numerous towns, and also rural communities. This variety affords residents opportunities to experience the rich diversity of these various communities; however, it makes transportation a challenge for those without a dependable vehicle. Public transportation is available throughout much of the region through fixed bus routes from the Montachusett Regional Transit Authority which serves 21 communities in the region. Connection to the MBTA commuter rail service is offered in Fitchburg, and Leominster, Unfortunately, given the limited amount of fixed route service outside of Leominster, Fitchburg and Ayer, utilizing public transportation for employment outside these cities is often not a viable option for job seekers/employees.

- (4) Please provide an analysis of workforce development activities, including education and training, in the local area. This analysis must:**
- a) include strengths and weaknesses of workforce development activities**

The North Central MassHire Career Center coordinates workforce development activities and educational opportunities in several career sector areas. These employment sectors include: Information Technology, Professional, Scientific and Technical Services, Finance, Health Occupations, Transportation and Warehousing, and Advanced Manufacturing. To ensure that education and training programs are meeting

the needs of the customers in the community, the MassHire Workforce Board reviews and approves all local programs. Additionally, the Workforce Board actively engages in grant acquisition with a Central/North Central regional focus, thus offering more opportunities to more potential workers. Recently, the Workforce Board has partnered with the MassHire Central Workforce Board, Mount Wachusett Community College, Quinsigimund Community College and the local vocational technical High schools to bring manufacturing training pipelines to the region. This is a five year grant with \$625,000 invested per year to drive recruitment into the sector.

In January of 2019, the Board will provide the Town of Clinton with employer feedback and recommendation as part of the towns Urban Renewal Grant. In this instance, the town will be converting a fire station in downtown Clinton into a “makers space” where students K-12 will be offered hands on, experiential learning and access to equipment and machinery used by employers in the local area. By meeting with employers, understanding their business, training and employment needs and connecting the school to those local employers, the Board will add value to the enhancement of the workforce system in Clinton.

Areas of weakness in the region include CNA programs that allow for timeliness enrollment procedures including open enrollments. This remains a challenge for students who would benefit from immediate access to training, have limited availability due to family obligations or require additional supports such as childcare/transportation services and/or coordination.

In addition, ESOL programs are limited in the area which remains a barrier for job seekers whose English is a second language.

For both of these cases, the Board is actively working with the North Central MassHire Career Center and Mount Wachusett Community College to increase availability of these educational opportunities.

b) address the capacity to provide the workforce development activities around:

i. education and skill needs of the workforce;

All MassHire North Central staff including the Business Services Representative and Rapid Response Representative participate in professional development activities critical to their success in understanding and supporting the skills and educational needs of the local workforce. These professional development activities include training in: labor market analysis, local economic data, regional economic forecasting, programs, partner services, customer service and universal design and accessibility. All staff members have access to professional development trainings offered through the Department of Career Services and Mount Wachusett Community College.

The MassHire North Central Workforce Board is comprised of local educational institution personnel, local and regional businesses and local provider agencies including the Massachusetts Rehabilitation Commission and the Department of Transitional Assistance who provide input to the education and skill needs of the local workforce.

ii. individuals with barriers to employment;

Priority of Service policies are derived from Federal, State and Local policy. Federal legislation such as WIOA and the Jobs for Veterans Act outline populations that must receive priority services.

WIOA requires priority services to be provided for designated populations as well as core partner “shared customers”.

Priority for WIOA Title 1 Adult Services must be given to individuals meeting the following criteria:

- *Recipient of Public Assistance*
- *Other Low Income Individual*
- *Individuals who are basic skills deficient*

In addition, all Veterans are to receive priority of services for all Department of Labor funded training programs provided they meet program eligibility requirements. All policies and procedures regarding priority of service align with Jobs for Veterans Act.

The MassHire North Central Workforce Board has developed a local Memorandum of Understanding (MOU) which identifies the following as priority populations within the North Central Region:

- *Unemployment Insurance Claimants*
- *Low income adults, including TANF and SNAP recipients*
- *Homeless, including homeless Veterans*

- *Adult Education participants (Title II)*
- *Individuals with Disabilities (Vocational Rehabilitation Title IV)*
- *Veterans*
- *Older workers*
- *Reintegration populations*
- *Youth, including youth with barriers to employment*
- *Trade: due to deadlines for benefits*

The MassHire North Central Career Center and Workforce Board ensure that all individuals have access to services and supports within the center. With regards to Physical Accessibility the physical layout of the building complies with the Americans with Disabilities Act and provides access to all individuals for services and trainings offered through the MassHire center. The Management Team coordinates physical accessibility audits conducted by the Commonwealth of Massachusetts to ensure compliance.

The MassHire center promotes programmatic accessibility ensuring that all customers have access to reemployment services. Assistive Technology and reasonable accommodations are available for individuals with disabilities engaged with the center.

The Center has space available for representatives from the Massachusetts Rehabilitation Commission (MRC), Massachusetts Commission for the Blind (MCB), Elder Affairs and the Department of Transitional Assistance (DTA) to meet with individuals and coordinate services and training including cost sharing initiatives with the MassHire North Central Career Center. Counselors from the MRC and DTA hold regular hours at the center each month.

For customers who have been previously incarcerated, the Center's Business Services Representative regularly engages with re-entry programs to assist in job placement efforts. In 2018, the first annual "Second Chance Job Fair" was held in Leominster to support this placement initiative.

All MassHire North Central Career Center staff have been trained and issued policy and procedure for customers with limited English language proficiency. Notification of available services to those who need this support are posted throughout the center as well as in the counselor cubicles.

iii. Employment needs of businesses.

The purpose of the Business Services team is to market and promote the MassHire Center's services to employers and other interested parties within the North Central region. The goal is build and maintain positive working relationships within the local business community that lead to successful hiring or training outcomes for all parties by providing onsite and virtual assistance. The Business Services Representative solicits new and existing business customers by attending Chamber of Commerce events and committees, attending local and regional workforce events, cold calling by phone and face to face meetings and follow up on referrals from existing business partners.

Current industry partnerships include: Montachusett Regional Planning Commission, Massachusetts Office of Technical Assistance and Technology, Commonwealth Corporation, Department of Industrial Accidents, Occupational Safety and Hazard Administration, Chambers of Commerce (North Central, Gardner, and Nashoba Valley), Arc of Opportunity, Department of Revenue, Leominster City Hall-Economic Development and Mayor's Office.

Industry briefings to staff are conducted weekly during staff meetings on trends and emerging employer needs. Job orders are distributed and "Hot Jobs" are identified using local LMI. Burning Glass Industry Insights Platform data is used to provide up-to-date LMI information for North Central Massachusetts.

The Business Services Representative (BSR) assists employers with small and large scale recruitment activities. The center offers on-site recruiting space and resources for employers to have a convenient location for recruitment and interviewing. This is a free service provided to employers. The Center has hosted large scale, multi-day events for Great Wolf Lodge, Burlington Coat Factory and HomeGoods. Included in the onsite services to employers is "Beyond the Walls of HR"-a forum for employer HR personnel to speak and answer questions with job seekers regarding HR policies and procedures.

The BSR organizes four to five annual job fairs at various conference/hotel facilities within the region. These quarterly events draw 60-70 employers and several hundred job seekers.

The BSR collects Job Orders from employers and enters information in Job Quest for access by staff. Employers are also encouraged to enter Job Orders into the system.

The BSR will introduce and keep employers informed on the Center's regional BizWorks activities and facilitate the connection between businesses and the state's Rapid Response team should the need arise.

The Executive Director of the Board is an active member of the National Association of Workforce Development Professionals. As such, information that is being pooled at the National level regarding business engagement strategies is being shared with the BSR at the center.

(5) Please describe your Board’s strategic vision to support regional economic growth and economic self-sufficiency. This must include goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment), and goals relating to the performance accountability measures based on performance indicators described in § 677.155(a)(1). The primary indicators of performance include:

- a) The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program;**
- b) The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program;**
- c) Median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program;**
- d) The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within 1 year after exit from the program**

Based on a comprehensive analysis of the Regional Blue Print which addresses labor market needs, challenges and priorities, the MassHire North Central Workforce Board sets forth the following strategic goals:

- Promote, develop and expand relevant career pathways, stackable credentials, work-based learning and skill development opportunities to address the hiring needs of the region’s priority industry sectors of Health Care and Advanced Manufacturing.*
- Increase access and opportunities for people with barriers to employment, such as people with disabilities, older workers, veterans, and low income adults, adults that are basic skills deficient, experienced or displaced workers with outdated job skills, and college graduates with academic credentials not matched to skill demand.*
- Provide the region’s youth with opportunities, skills and credentials to participate in career pathways and secure employment.*
- Procurement for the MassHire Leominster Career Center Operator for FY 2020.*

The MassHire North Central Workforce Board will track plan goals quarterly through the WIOA performance measures collected in MOSES which include: the percentage of participants who are in unsubsidized employment during the second

and fourth quarter after exit, median earnings of participants who are in unsubsidized employment during second quarter after exit, and the percentage of participants enrolled in an education or training program and who attained a recognized postsecondary credential or secondary school diploma or its recognized equivalent, during participation in or within 1 year after exit from the program.

(6) Taking into account analyses described in 1 through 4 above, what is your regions strategy to work with the entities that carry out the core programs and required partners to align resources available to the local area, to achieve the strategic vision and goals described in paragraph (a)(5) of this section.

The MassHire North Central Workforce Board will be the principal negotiator with the Partners to shape the delivery of services through the MassHire North Central Career Center ensuring quality services to the North Central population. An MOU has defined the roles and responsibilities of all partners to enhance and expand the current services being offered at the MassHire center and to meet the need of an ever-evolving workforce. Quarterly meetings are held to ensure goals are met and the alignment of resources to the region.

The MassHire North Central Workforce Board and the Partners agree to conduct the following activities at a local level:

- Participate in the operations of the Massachusetts delivery system consistent with the terms of this MOU, the requirements of WIOA, and the requirements of federal law authorizing Partner programs and activities.*
- Contribute in the defining process of what a “shared” customer’s path may be between Partners, to create a clear understanding of how a multitude of providers, services and resources should support youth, job seekers and businesses.*
- Actively participate in the redesign of the MassHire North Central Career Center customer-centered design and service continuum across partner agencies, including access and availability of services to shared customers.*
- Utilize robust technology tools to scale up practices and provide more significant supports for individuals with barriers to employment, including basic skills assessment, remediation, and career development tools.*
- Required MassHire North Central Career Center Partners will use a portion of the funds available for programs and activities to maintain the MassHire North*

Central Career Center delivery system, including infrastructure and shared costs of the center, through methods agreed upon by the MassHire North Central Workforce Board, Executive Director, and Partners.

(b) Under WIOA, the plan must include a description of the following requirements (WIOA secs. 108(b)(2)–(21)):

(1) Identify the following elements of the workforce development system in your local area:

(i) Programs that are included in your local workforce system (please list programs)

The following programs are included in our local workforce system:

- *Title I Adult*
- *Title I Dislocated Worker*
- *Unemployment Claimants*
- *Trade*
- *Veterans Services*
- *Reemployment Services*
- *Reemployment Services Eligibility Assessment (RESEA)*
- *Specialized Career Center Programs (Tech Hire, National Dislocated Workers Grant, Learn to Earn, Connecting Activities)*
- *Vocational Rehabilitation (MRC, MCB)*
- *DTA Work Participation Program*
- *Mount Wachusett Community College*
- *Regional Vocational Technical High Schools (Montachusett, Nashoba Valley, Leominster CTE, Minuteman, Assabet)*

(ii) How your Board will support the strategy identified in the State Plan and work with the entities carrying out core programs and other workforce development programs, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) to support service alignment

The MassHire North Central Workforce Board will support the strategy identified in the state plan by remaining committed to employer centric solutions through strategic partnerships and collaborative services. This will include the engagement of all core and mandatory MassHire Center partners and other stakeholders to advance common goals. The Board will take the lead in building the capacity of all partners in the system to deliver excellent workforce services that meet the needs of our communities. The Board will serve as a keeper of a guiding vision for workforce development and will engage funders, partners, employers and community members around that vision. In this partnership, the Board will conduct market analysis and environmental scan, confirm priority industry sectors, identify additional data to be collected, identify job needs, growth potential, future employment prospects and skill needs, review existing career pathways to meet skill requirements and monitor partner collaboration to ensure that duplication of services does not occur.

The MassHire North Central Workforce Board will support the strategies outlined in the State Plan and work with entities in a collaborative manner to ensure a comprehensive yet efficient workforce system that supports the people living in the communities of North Central Massachusetts. The Board will leverage funding and existing resources through existing partners providing services. The Workforce Board through their close collaboration with partners engage in leveraging the resources of each organization to maximize the ability of the MassHire North Central Career Center to meet the needs of job seekers and employers. Financial, physical and human resources are leveraged. For Instance:

- *Utilization of physical space*
- *Knowledge/expertise (priority population specialists)*
- *Technology*
- *Cost-share of services, supports*

The Board will utilize a demand driven model which has been operationalized at the MassHire North Central Career Center.

(2) Please describe how your Board will work with entities carrying out core programs to:

- (i) Expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment;**

The MassHire North Central Workforce Board with representatives of secondary and postsecondary education programs, will lead efforts to develop and implement career pathways within the local area by aligning the employment, training, education, and supportive services that are needed by adults and youth, particularly individuals with barriers to employment. This will include work with the State to ensure there are sufficient numbers and types of providers of career services and training services serving the local area and providing the services in a manner that maximizes consumer choice, as well as providing opportunities that lead to competitive integrated employment for individuals with disabilities.

- (ii) Facilitate the development of career pathways and co-enrollment, as appropriate, in core programs; and**

The MassHire North Central Workforce Board will promote, develop and expand relevant career pathways, stackable credentials, work-based learning and skill development opportunities to address the hiring needs of the region's priority industry sectors. This will be accomplished by maintaining strong partnerships to ensure training partners understand the needs of employers, increase the pipeline of available skilled workers and upskill incumbent employees, educate adults and youth about career pathways and training opportunities through our Career Center and support local community college and vocational schools to develop curriculum for critical and emerging industries.

- (iii) Improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and stackable);**

The MassHire North Central Workforce Board will work directly with the Center and Mount Wachusett Community College to improve access to industry recognized certifications that are portable and stackable. This will be accomplished by engaging with the local industry to determine core skills and training needed within those industries and develop curriculum that supports advancement within the industry. This

will comprise of coordination of programs through the Career Center and college, development of internships/apprenticeships and investment in equipment and technology so that programs may be accessed in traditional classrooms, in off-site “makers spaces” or through on line training modules.

(3) Please describe the strategies and services that will be used in your local area:

- (i) To facilitate engagement of businesses in workforce development programs, including small businesses and businesses in in-demand industry sectors and occupations;**

The MassHire North Central Workforce Board and MassHire North Central Career Center will facilitate engagement of businesses in workforce development by developing, maintaining and enhancing relationships within the business community. This will be achieved with face to face interaction, sharing of resources for hiring events, education and training programs designed through feedback received by employers on employer needs and industry trends. The Board has established both Advanced Manufacturing and Healthcare consortiums in the region. Both Advanced Manufacturing and Healthcare industries are priority sectors in the region. Regular representation by Board and Center staff at Chamber of Commerce Events and Regional Employer Conferences will also facilitate engagement with workforce development programs. The Board and Center will regularly update employer contacts with grant funded training opportunities, access to hiring and retention resources and additional resources that support the growth and expansion of local industry sectors and occupations. The BSR will provide education and information on hiring incentives including tax incentives that will encourage business to utilize workforce development programs.

Businesses that engage and utilize workforce development programs will be recognized through the use of media outlets, quarterly Board meetings, and sharing by the centers BSR to other business contacts.

- (ii) To serve agricultural businesses and how you intend to improve those services;**

Agricultural businesses identified through Regional Business Description data will be provided with information on the procedures and services available to farm workers that is utilized at the MassHire North Central Career Center. The MassHire North Central Workforce Board will encourage local agricultural businesses to become members of the local board giving them access to

additional resources and information on local and regional workforce development activities as well as connecting them with other Board members.

- (iii) To support a local workforce development system that meets the needs of businesses in your area;**

The Board and MassHire Center staff will ensure the local workforce development system is meeting the needs of businesses in the area through the use of employer survey, face-to-face communication, LMI review and utilization, Job Quest, and the use of a “call us first” system with employers to match potential employees. Introduction of On-the -Job Training (OJT) services and fiscal resource support, incumbent worker training programs and the facilitation of career pathway and career ladder training initiatives for job seekers. Additionally, ongoing coordination with Mount Wachusett Community College and businesses to develop curriculum and training to meets the needs of the local employers.

Onsite/offsite recruitment activities, hiring events and job fairs and a focus on referral acquisition and internal vetting of candidates will further meet the needs of local employers.

- (iv) To better coordinate workforce development programs and economic development;**

The MassHire North Central Workforce Board membership roster includes the City of Leominster Economic Development Director and maintains strong partnerships with Economic Directors from Leominster, Gardner and Fitchburg as well as personnel from the other 20 towns served by the board.. Through these partnerships, the Board and MassHire center management will be provided up to date information on regional economic development strategies and initiatives and in turn bridge the gap regarding future employment needs and skill acquisition necessary to support strong economic development. For businesses looking to locate in the region, Center resources like Burning Glass data can be provided to assist in talent development.

- (v) To strengthen linkages between the Career Center delivery system and unemployment insurance programs;**

The MassHire North Central Board and Career Center will ensure compliance with RESEA unemployment walk in navigation services. Through re-employment eligibility, selected claimants are required to be provided re-employment services and must actively participate in the services to remain

eligible for program benefits. As part of ongoing case management, staff will ensure that participants are receiving available career center services and partner training supports as appropriate.

a. What methods are used by the Board to identify and recruit business intermediaries

The MassHire North Central Workforce Board actively attends community events, local business forums, Chamber of Commerce events to identify and recruit business partners to the Board. The Board uses social media outlets LinkedIn, Facebook, Twitter, cable television as well a website to educate, inform and encourage participation in the Board and services offered at the MassHire North Central Career Center. Direct outreach to business leaders, speaking at business and community events as well as scheduling of face-to-face information sessions are also utilized to build relationships.

b. Specifically, what procedures are in place to offer Career Center Business Services and Mass BizWorks programs to local businesses

Once a business entity has been identified as a potential partner to the MassHire North Central Career Center, the center's Business Services Representative (BSR) initiates contact with the business to schedule an introduction to services and supports including regional BizWorks programs. All center staff know to direct potential business leads to the BSR who is the center's main point of contact. Given that the Board is also co-located with the Center, business contacts attained through Board efforts are also shared with the BSR.

- (vi) That may include the implementation of 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 regional businesses. These initiatives must support the strategy described in paragraph (b)(3) of this section;

(4) Please provide an examination of how your Board will:

- **Coordinate local workforce investment activities with regional economic development activities that are carried out in the local area**

The MassHire North Central Workforce Board will continue to maintain strong working relationships with the Economic Development Directors for the cities of Leominster, Fitchburg and Gardner as well as personnel from the other 20 towns served by the board. The Director for the city of Leominster will remain as an active Board member. The Board will continue to establish additional relationships with Economic Development personnel in the 23 cities/towns in the region. Through those partnerships, Board involvement in work tours, employer symposiums and sharing LMI and service delivery trends through the Career Center will assist cities and towns in the ability to provide labor to business interested in coming to or expanding in the North Central region.

- **Promote entrepreneurial skills training and microenterprise services**

For some job seekers, the pursuit of self-employment poses the best opportunity for success in the workforce. For those who seek this pathway, the Board can assist by providing information on small business and self-employment resources through the local Chamber of Commerce. The Massachusetts Small Business Development Centers (SBDCs) and Service Corps of Retired Executives (SCORE) offer business counseling services and have hours at the North Central Chamber of Commerce. This service is free of charge and it is not necessary to be a Chamber member. Both agencies provide one to one management and technical assistance counseling for prospective and existing small businesses. The NewVue Communities Small Business Development Office, 470 Main St. in Fitchburg, offers free assistance with business plan, workshops, training and support.

(5) Please describe the Career Center system in your area, including:

- (i) How your Board will ensure the continuous improvement of eligible providers through the system and that such providers will meet the employment needs of local businesses, workers and job seekers;**

The MassHire North Central Workforce Board will ensure the continuous improvement of eligible providers by tracking and reviewing measurable outcomes for services provided. This will include enrollments, progress and successful completion including job placement post-program participation and cost per outcome metrics. Participant feedback will be gathered and also provide the Board with information regarding the services offered. The service providers will be required to demonstrate to the Board their efforts in looking at local and regional LMI, identification of skills gaps, employer needs and location economic development activities as well as understanding of the local workforce and the socio-economic variables that affect their day to day lives.

- (ii) How your Board will facilitate access to services provided through the Career Center system, including in remote areas, through the use of technology and other means;**

The Board will facilitate access to services by ensuring first and foremost that all 23 towns and cities served by the Board are well informed on the new branding of the MassHire system including the ability to access services throughout the commonwealth. The MassHire North Central Career Center has had tremendous success conducting ad hoc outreach with the communities served by the center and has numerous partner staff engaged in this work at the employer, customer and partner agency levels.

Inclusive of these efforts has been to ensure that citizens of the commonwealth are well informed on the MassHire brand, how and where to visit a MassHire center and how to contact a center for information on services, the use of technology will be included.

Both the MassHire North Central Workforce Board and Career Center will operate and maintain websites containing information on activities, programs and strategic planning initiatives. The use of LinkedIn, Facebook and Twitter will also be used as

a means to connect globally. Local, community based cable programs that cover the region will also be utilized to enhance accessibility of services.

Additionally, the Board will work with the center's on-line services, WebEx trainings and Webinars. The Board will work with the local community college around the increase of on-line learning programs that could benefit learners whose transportation issues impact access to the Center and college.

- (iii) **How entities within the Career Center system, including Career Center operators and partners, will comply with WIOA sec. 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, including providing staff training and support for addressing the needs of individuals with disabilities;**

"No individual shall be excluded from the participation in, denied the benefits of, subjected to discrimination under, or denied employment in the of or in connection with, any such program or activity because of race, color, religion, sex (except as otherwise permitted under Title IX of the Education Amendments of 1972), national origin, age, disability or political affiliation or belief."

As such, the MassHire North Central Career Center ensures that all individuals have access to services and supports within the center. Section 38.13 of WIOA refers to both Physical Accessibility and Programmatic Accessibility requirements under WIOA. The following steps have been taken to ensure staff development and program compliance with section 188.

- *Physical space audit conducted by the Commonwealth of Massachusetts*
- *Accessibility Staff Development Training conducted by the Polus Center*
- *Motivational Interviewing Staff Development Training (on-site training session)*
- *Assistive Technology Audit by the Massachusetts Commission for the Blind.*

The Following key terms/definitions are included in the MassHire North Central Career Center Standard Operating Procedures and are reviewed with staff periodically to ensure familiarity with language specific to section 188 of WIOA and its applicability to their day-to-day functions and duties within the career center.

- *Reasonable Accommodations*

- *Fundamental alteration*
- *Qualified Individual with a disability*

(iv) The roles and resource contributions of your partners – how are these relationships sustained and kept productive;

The MassHire North Central Workforce Board sustains its partner relationships by actively coordinating with them on a regular basis. Face-to-face meetings, conference calls, attendance at conferences and sharing of information via email are all ways in which relationships remain productive. The Board keeps providers well informed on overall activities conducted by the Board, encourages partners to be active participants in the planning and implementation of local and regional workforce initiatives and encourages innovative and unique ideas of ways providers can add value to the workforce system.

The Board takes every opportunity to publically recognize the efforts put forth by the provider partners and will nominate providers for awards and achievement recognition when the opportunity to do so arises.

(6) Please provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in your local area.

Currently through the Center and in partnerships with community providers, programs in healthcare (CNA, HHA, Pharm Tech), transportation/warehousing, IT are available and provide the job seeker with skills necessary to work in these industries. Training programs can range anywhere from 4-10 weeks in duration and training providers are located within the region.

Mount Wachusett Community College offers Certificate programs in: business/accounting, healthcare, Information Technology, public and social services, automotive technology, arts and communications. Mount Wachusett Community College will coordinate with the Center to develop training programs to serve an unmet need which aligns with emerging industries. These include: Tech Hire, Manufacturing and Retail/ESOL trainings.

Enrollment in both community and MWCC programs can be done in person or online making them readily available to job seekers looking for additional training while receiving services from the Center.

(7) Describe how your Board will coordinate workforce investment activities carried out in the local area with statewide rapid response activities.

The Massachusetts Department of Career Services Rapid Response Team provides layoff aversion and early intervention re-employment services at no cost to companies and their employees affected by layoffs and closing. Mandated and funded by the Workforce innovations Opportunities Act (WIOA), our quality, on-site outplacement services provide an effective and smooth transition to new employment for all affected employees.

The Massachusetts Rapid Response Team is co-located within the MassHire North Central Career Center. The co-location of this team allows the region to proactively serve employers in transition and their affected staff. Rapid response provides a variety of on and off-site services including but not limited to:

- *Employee information and orientation sessions*
- *On-site individual employment counseling*
- *On-site job search workshops*
- *Job placement services*
- *Coordination with WIOA partners regarding shared resources*

and services

- (8) Please provide a description and assessment of the type and availability of youth workforce investment activities in your area including activities for youth who are individuals with disabilities, which must include an identification of successful models of such activities.**
- a. Please also provide a description of youth workforce investment activity coordination with the Department of Transitional Assistance, Massachusetts Rehabilitation Commission, and Massachusetts Commission for the Blind.**

As a result of the limited WIOA dollars for youth, and the federal requirement that 70% of the WIOA funds be spent on out of school youth, our local area procures only for out of school services. Many youth are reluctant to self-identify a disability, and no longer have the in school supports offered via a 504 plan or an IEP.

Our current WIOA Youth Sub recipient, MY TURN, has agreements in place with the following agencies:

Mount Wachusett Community College to provide access to further educational placements depending on the specific needs of a participant. MWCC has programming to meet the needs of high school drop outs as well as in school high school students who need MCAS reinforcement to complete testing and a variety of other services that will be available to program participants.

Reliant Medical Group, The Spanish American Center, The Salvation Army, Exit Realty, Community Health Connections and The Boys & Girls Club of Fitchburg & Leominster to provide internship opportunities, leadership development, guest speaking, and mentoring.

Leominster Credit Union to provide Financial Literacy training to our students.

MY TURN is an approved DTA service provider for the Young Parents program, providing remedial education and job/education placement and follow up services.

The Board and the MassHire center coordinate with the Massachusetts Rehabilitation Commission and Massachusetts Commission for the Blind with their Pre-Employment Training Programs (pre-ets) to ensure that youth with disabilities are getting high quality pre-employment training, and work exposure that will reinforce good vocational skills at an early age.

- (9) Please explain how your Local Board will coordinate relevant secondary and postsecondary education programs and activities with education and workforce investment activities to coordinate strategies, enhance services, and avoid duplication of services.**

In the Regional Blue Print, relevant secondary and postsecondary education programs were identified as partners and part of the strategic plan. A curriculum overview and analysis was completed to understand the current capacity within secondary and post-secondary educational programs, and potential program growth. MassHire North Central Workforce Board provides current labor market data and letters of support to schools expanding programs in priority industries. The Board uses the Connecting Activities grant funds to enhance the work of secondary schools around employer engagement, work and learning experiences and career awareness based on the blue print goals.

- (10) How will your Board coordinate WIOA title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area? Please also describe how other programs and services in your local area are leveraged to compliant workforce investment activities.**

The MassHire North Central Workforce Board will coordinate WIOA Title I by ensuring that supportive services can be requested for customers to include but not limited to: gas reimbursement to /from training, uniforms, work clothing, test fees, and supplies required for training or a job.

Supportive services for adults and dislocated workers include services such as: transportation, child care, dependent care, housing, and needs-related payments that are necessary to enable an individual to participate in activities authorized under WIOA Title I. Supportive services for youth include, but not limited to, the following:

- a. Linkages to community services;*
- b. Assistance with transportation;*
- c. Assistance with child care and dependent care;*
- d. Assistance with housing;*

- e. Needs-related payments;
- f. Assistance with educational testing;
- g. Reasonable accommodations for youth with disabilities;
- h. Legal aid services;
- i. Referrals to health care;
- j. Assistance with uniforms or other appropriate work attire and work related tools, including such items as eye glasses and protective eye wear
- k. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
 - l. Payments and fees for employment and training-related applications, tests, and certifications.

The Board also recognizes that supportive services may only be provided to adults and dislocated workers who are:

- l. *Participating in career or training services, and unable to obtain supportive services through other programs providing such services.*

Supportive services may only be provided when they are necessary to enable individuals to participate in career service or training activities.

When supportive services may be necessary to assist someone achieve a successful employment outcome, cost-sharing services with partner programs like the Massachusetts Rehabilitation Commission, Massachusetts Commission for the Blind, Department of Transitional Assistance and Department of Education may be utilized.

(11) What plans, assurances, and strategies do you have in place for maximizing coordination, improving service delivery, and avoiding duplication of Wagner-Peyser Act (29 U.S.C. 49 et seq.) services and other services provided through the Career Center delivery system?

The MassHire North Central Career Center's operational structure guarantees multiple partner agencies within North Central Massachusetts play an active role in the delivery of comprehensive workforce development activities and individual and group re-employment services. This structure also provides coherence and consistency to the ongoing process of recognizing areas of duplicative services and streamlining the delivery of such services. To preserve and enhance this organizational structure the Center's management team:

- *Holds weekly meetings between DCS (Lead) and Mount Wachusett Community College (Co-lead) staff*
- *Quarterly meetings between all consortium members*

(DCS, MWCC, DUA, DTA)

- *Partner quarterly meetings coordinated through the Board.*

All staff are cross-trained in the array of services offered at the career center. Additionally, all staff participate in the Career Center Seminar (required by all potential participants). The seminar provides an overview of a variety of topics pertaining to service delivery, available resource and service delivery flow and outcome expectations.

Following the Career Center Seminar, all participants meet with and continue their process with one staff member to formulate a job search plan and schedule a follow up appointment. This plan may include, but not be limited to, such activities as Labor Market Information (LMI), TORQ, job search activities, upcoming job fairs and workshops.

All staff can provide such services as: unemployment assistance, navigation, initial assessment, career Planning, job match and referrals, resume development, Job search, job placement and training options.

(12) How will career and training services, required under WIOA, be provided to Migrant Seasonal Farm Workers (MSFWs) through the Career Center(s)?

At the MassHire North Central Career Center, staff determine if participants are Migrant Seasonal Farm Workers (MSFW) as per the regulations (DCS Policy Directive 100DCS 08.105) and collect the appropriate documentation from the individual. As part of assisting these individuals, staff will ensure that migrant seasonal farm workers with limited English proficiency (LEP) receive, free of charge, the language assistance necessary to afford them meaningful access to the programs, services, and information available. The Center staff will also provide migrant seasonal farm workers a list of available career and supportive services in their native language.

Career Center staff will also refer and/or register MSFWs for services, as appropriate, if the MSFW is interested in obtaining such services. If or after referrals are made to other appropriate services, Career Center staff must conduct follow-up and document the results in MOSES.

Career Center staff must make job order information conspicuous and available to MSFW's by all reasonable means. Such information must, at minimum, be available through web based systems, posted at the MassHire Career Center or in writing as needed

(13) How will the Board coordinate WIOA title I workforce investment

activities with adult education and literacy activities? This description must include how the Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232:

Each eligible provider desiring a grant or contract from an eligible agency shall submit an application to the eligible agency containing such information and assurances as the eligible agency may require, including a description of –

- i. of how funds awarded under this title will be spent consistent with the requirements of this title;
- ii. any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of adult education and literacy activities;
- iii. how the eligible provider will provide services in alignment with the local plan under section 108, including how such provider will promote concurrent enrollment in programs and activities under title I, as appropriate;
- iv. how the eligible provider will meet the State adjusted levels of performance described in section 116(b)(3), including how such provider will collect data to report on such performance indicators;
- v. how the eligible provider will fulfill Career Center partner responsibilities as described in section 121(b)(1)(A), as appropriate;
- vi. how the eligible provider will provide services in a manner that meets the needs of eligible individuals; and
- vii. information that addresses the considerations described under section 231(e), as applicable.

The MassHire North Central Workforce Board will safeguard that WIOA Title I workforce investment activities are aligned with adult education and literacy activities under WIOA Title II. The Board will review all applications with representatives from DESE taking into consideration the needs of the region, duplication of services, fiscal impact and the availability of ancillary supports that will maximize successful outcome of services.

The Board reviewer will be trained on reviewer standards and practices and how to utilize the scoring matrix. Reviews will take place at the MassHire North Central Workforce Board offices with representatives from DESE. The Board reviewer will take into consideration the following as part of the review:

- *How will awarded funds be spent consistent with Title requirements*
- *Arrangements with other agencies in the delivery of adult education programming*
- *Alignment of the providers services with the local plan including concurrent enrollment in Title I programs.*
- *Performance data tracking, outcome reporting*
- *Meeting the needs of the local Career Center partner*
- *Ability to meet the needs of all eligible individuals*

(14) Provide copies of executed cooperative agreements, MOUs, ISAs, or other agreements between required partners which define how all local service providers, including additional providers, will carry out the requirements for integration of and access to the entire set of services available in your local Career Center delivery system. This includes cooperative agreements (as defined in WIOA sec. 107(d)(11)) between the Board or other local entities described in WIOA sec. 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) and the local office of a designated State agency or designated State unit administering programs carried out under title I of the Rehabilitation Act (29 U.S.C. 720 et seq.) (other than sec. 112 or part C of that title (29 U.S.C. 732, 741) and subject to sec. 121(f)) in accordance with sec. 101(a)(11) of the Rehabilitation Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative

efforts with businesses, and other efforts at cooperation, collaboration, and coordination.

Describe how the Local Board/Career Center intends to build upon/increase collaboration with existing partners and in establishing new partnerships with local service providers (including any approximate timelines for establishing agreements or building upon existing agreements). (Note: There is a statewide collaborative agreement in place between DCS and the New England Farm Workers' Council (NEFWC), the WIOA Sec. 167 Grantee. A copy of the agreement will be included as part of the consolidated State Plan).

See attachments

The MassHire North Central Workforce Board and Career Center will continue to build upon and increase teamwork with existing partners by ensuring that regular meetings occur with partners with structured agenda's, action steps and clear strategies to drive collaborative delivery systems. These meetings will occur at least quarterly and all current agreements will be reviewed annually. Current agreements will be reviewed by March 2019.

(15) Please provide the name and contact information of your Fiscal Agent.

MassHire North Central Workforce Board
100 Erdman Way
Leominster, Ma 01453
978-534-1023
Contact: Mary Chase mchase@masshirenorthcentralwb.com

(16) Please detail the competitive process that will be used to award the sub grants and contracts for WIOA title I activities.

Procurement by competitive proposals (e.g., Request for Proposals):

The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

- i. Requests for proposals will be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals shall be honored to the maximum extent practical;*
- ii. Proposals will be solicited from an adequate number of qualified sources;*

- iii. *Grantees and sub grantees will have a method for conducting technical evaluations of the proposals received and for selecting awardees;*
- iv. *Awards will be made to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and*
- v. *Grantees and sub grantees may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services through A/E firms as a potential source to perform the proposed effort.*

Request for Qualifications:

The process of a Request for Qualifications is a two part one. First, a formal solicitation is issued to obtain submissions from vendors. These submissions are then reviewed and a list of vendors qualified to provide the goods or services required is developed. The second stage of the process is the comparison of two or more qualified providers to determine which will be chosen to provide the goods or services.

Individual Training Accounts:

The process of choosing a provider to train a participant through an Individual Training Account is an exception to the RFQ process. The first stage is the same: a formal solicitation is issued to obtain submissions from providers, this is done at the state level. However, the second stage of the process consists of the participant, with the guidance of his/her counselor, comparing the providers of qualified programs to choose the program most appropriate for him/her.

Non-Competitive Procurement:

It is the policy of the MassHire North Central Workforce Board, Inc. to issue Requests for Proposals (RFP) in all cases unless it is irrefutable evident that there is only one possible source for the desired goods, program or services (sole source).

Failed Competition:

Should the Request for Proposals generate only one response, the following will be reviewed:

- Was the RFP notice distributed to all appropriate potential vendors?*
- Was the Statement of Work clear? Was adequate response time allowed?*

If this analysis shows that appropriate procedures for the RFP or its dissemination were followed, the cost/price analysis will be completed by the Executive Director or Fiscal Manager to establish cost reasonableness before contract negotiations are begun and a contract awarded.

Sole Source:

Sole Source contracts, which exceed \$25,000 or more, must be approved in writing by the Division of Career Services. Requests for approval must provide:

- *A copy of the offer's proposal*
- *A cost/price analysis*
- *A copy of MassHire North Central Workforce Board, Inc. justification for the award*
- *Documentation of North Central Workforce Board, Inc. discussion and approval*
- *A cover letter requesting approval*

These awards will not be approved retroactively.

Sole Source contracts of less than \$25,000 will be reviewed by the same standards. The

Executive Director will seek approval on sole source procurements for WIOA Funds of \$25,000 or more from the Local Workforce Investment Board.

Prior written approval from Division of Career Services (or appropriate other agency) must be obtained for any actual sole source or emergency/exigency award which is in excess of \$10,000. All such awards must be justified and documented. Requests for approval must include the following information:

- *copy of the offers proposal*
- *copy of the cost/price analysis*
- *copy of related MHNCWB meeting discussion minutes*
- *copy of the non-competitive/award justification*
- *cover letter requesting approval*
- *failed competition analysis*

Such awards will not be approved retroactively.

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate.

- *Procurement by noncompetitive proposals may be used **only** when the award of a contract is infeasible under small purchase procedures,*

sealed bids or competitive proposals and one of the following circumstances applies:

- *The item is available only from a single source;*
- *The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;*
- *The awarding agency authorizes noncompetitive proposals; or*
- *After solicitation of a number of sources, competition is determined inadequate, or failed competition, where the solicitation has resulted in fewer than two responsive and responsible bids.*
- *Cost analysis, i.e., verifying the proposed cost data, the projections of the data, and the evaluation of the specific elements of costs and profits, is required.*

Frequency of Solicitations:

Solicitation shall occur at a maximum of every two years to promote and encourage competition. Solicitation of Audit services shall occur at a minimum of every five years. Multi-year funding of contractors must be consistent with the conditions of the approved RFP and award. In addition, subsequent year funding is to be retained as the option of the Program Operator/Service Provider only and must be subject to successful performance and formal, documented contract negotiations.

(17) Please provide the local levels of performance negotiated with the Governor and chief elected official consistent with WIOA sec. 116(c), to be used to measure the performance of your local area and to be used by the Local Board for measuring the performance of your local fiscal agent (where appropriate), eligible providers under WIOA title I subtitle B, and the Career Center system in the local area.

FY2019 and FY2020 WIOA Performance Measures Mass Hire North Central		
	FY19	FY20
WIOA Title I Adult Measures		
Employment Rate in the 2 nd Quarter After Exit	86.0%	86.5%
Employment Rate in the 4 th Quarter After Exit	78.0%	78.0%
Median Earnings in the 2 nd Quarter After Exit	\$5,200	\$5,300
Credential Attainment Rate	71.0%	72.0%
Measureable Skills Gains		
Effectiveness in Serving Employers		
WIOA Title I Dislocated Worker Measures		

Employment Rate in the 2 nd Quarter After Exit	86.0%	86.0%
Employment Rate in the 4 th Quarter After Exit	85.0%	85.0%
Median Earnings in the 2 nd Quarter After Exit	\$7,700	\$7,800
Credential Attainment Rate	60.0%	62.0%
Measureable Skills Gains		
Effectiveness in Serving Employers		
WIOA Title I Youth Measures		
Employment/Education Rate in the 2 nd Quarter After Exit	80.5%	81.0%
Employment/Education Rate in the 4 th Quarter After Exit	73.0%	73.5%
Median Earnings in the 2 nd Quarter After Exit		
Credential Attainment Rate	70.5%	70.5%
Measureable Skills Gains		
Effectiveness in Serving Employers		
WIOA Wagner-Peyser Measures		
Employment Rate in the 2 nd Quarter After Exit	64.0%	64.5%
Employment Rate in the 4 th Quarter After Exit	63.0%	64.0%
Median Earnings in the 2 nd Quarter After Exit	\$6,000	\$6,100
Effectiveness in Serving Employers		

- (18) What are the actions and activities that support the local boards continued status as a high-performance workforce board?**
- a). What trainings are applicable to Board members?**
 - b). How do business Board members contribute to workforce development in your region?**
 - c). How does your Board support the business services in the career centers? d). To what extent does inter-/intra-Board collaboration result in positive outcomes for job-seekers and businesses?**

The MassHire North Central Workforce Board in 2010 completed the certification process and was awarded the distinction of a High Performance Workforce Board. As such, MNCWB's Strategic Planning committee and Youth Council meets regularly to review and revise goals, objectives and outcomes and shares our progress with the full Board using our dashboard reports. A chief goal of the Board is to provide strategic and operational oversight in collaboration with the required and additional partners and workforce stakeholders to help develop a comprehensive and high quality workforce development system in the local area and larger planning region. Additionally, the Board continuously builds the capacity of all partners in the system to deliver excellent workforce services that meet the needs of our communities. The Board Serves as a keeper of a guiding vision for workforce development and engages funders, partners, employers and community members around that vision.

Board members are offered the opportunity and strongly encouraged to participate in both local and regional training opportunities to further enhance their knowledge of the local and regional economy, workforce development initiatives and human resources including diversity inclusion and workers with disabilities.

Inclusive in their role, Board members contribute to the local workforce development strategy in multiple ways. Board members offer expertise in their respective fields and provide regular feedback and guidance regarding their industries, hiring trends, skills gaps and ways the MassHire Center and educational partners can prepare a qualified workforce. Board members will serve on additional committees within the board to drive initiatives and grants and can be regularly called upon to coordinate job tours for youth interested in learning about certain job sectors. Board members with human resource expertise can be called upon to educate on diversity, inclusive workforce and workplace culture.

Board members will utilize the services of the local MassHire center when seeking potential candidates for employment. The Business Services Representative attends Board meetings and collaborates directly with Board members on job fairs, hiring events, MassHire center trainings as well as act as a “phone call way” resource for the Board with regards to industry questions and employment needs.

The MassHire North Central Workforce Board culture of collaboration will continue to result in improved opportunities for job seekers in the North Central region. Success of this collaboration can be seen from the work done through the Disability Employment Initiative V grant in which a Board Member business played a vital role in employment outcomes for people with disabilities identified in the grant. Board members serving the finance industry have been a regular participant in Workforce Training Grants and have hired multiple customers through the years. Ultimately, the Board continues to be a vital resource for the overall success of the region.

(19) How will training services outlined in WIOA sec. 134 be provided through the use of individual training accounts, including, if contracts for training services will be used, how the use of such contracts will be coordinated with the use of individual training accounts under that chapter, and how your

Board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided.

WIOA Title I Training Funds are allocated to the North Central region by the State and issued to customers by the MassHire North Central Workforce Board via an Individual Training Account (ITA). These funds must be considered funds of last resort and should only be used after all other federal supports have been exhausted. In order to receive approval for an ITA the counselor must facilitate the following with the customer and confirm all appropriate eligibility documentation has been approved. The counselor will:

- *Review eligibility documentation and confirm in MOSES for Title I eligibility*
- *Review results of comprehensive assessments*
- *Review career goals and assessment results, identify skills gaps*
- *Review the Eligible Training Provider List (ETPL) and confirm eligibility status with customer*
- *Review and with customer complete necessary paperwork*
- *Review tabs in MOSES for accuracy*
- *Complete training information and occupational research forms with customer*
- *Add goals to MOSES*
- *Add Training Justification in MOSES*
- *Add any additional job search materials to case file*

The MassHire North Central Workforce Board expects that Informed Customer Choice is a best practice that is expected with all service delivery offered at the MassHire North Central Career Center.

Therefore, when implementing the use of ITA's as part of a plan for employment, the customer will be informed of the ITA process and be an active participant and joint decision maker with the counselor in the review and signing of documents, review of training providers and their training expertise and be well informed of the expected outcome of this ITA support.

(20) Please describe the local area strategy and service plans for utilization of the following work-based training models:

- a. **On-the-Job Training, including use of the Commonwealth’s waiver to provide up to 90% employee wage reimbursement to businesses with fewer than 50 employees**
- b. **Apprenticeship**
- c. **Incumbent Worker Training**
- d. **Work Experiences (paid or unpaid)**
- e. **Transitional jobs (§ 680.190 – *one that provides a time-limited work experience, that is wage-paid and subsidized, and is in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history, as determined by the Local Board. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment*).**
- f. **Online remediation tools (such as WorkKeys Curriculum) for OJT/apprenticeship screening in support of cultivating and demonstrating workplace competencies.**
 - i. **Does the local area utilize the National Career Readiness Curriculum (NCRC) to measure job-seekers work ethic and discipline, basic skills abilities, and job-ready qualifications?**

On-the-Job Training

The On-the-Job Training (OJT) program enables employers to hire new employees and train them at their place of business while being reimbursed 50 percent of the new hire's wages during the training period.

***If anyone from the following priority populations is identified for an OJT opportunity, the MassHire North Central Career Center (MHNCCC) will approach the MassHire North Central Workforce Board (MHNCWB) for approval for up to 75% reimbursement through the OJT.*

- *Displaced homemakers;*
- *Low-income individuals;*
- *Indians, Alaska Natives, and Native Hawaiians;*
- *Individuals with disabilities; e. Older individuals (i.e. those 55 or over);*
- *Ex-offenders;*
- *Homeless individuals;*
- *Youth in or have aged out of the foster care system;*

- *Individuals who are English language learners, low levels of literacy, and those facing substantial cultural barriers;*
- *Eligible migrant and seasonal farmworkers (WIOA sec. 167(i));*
- *Individuals within 2 years of exhausting lifetime eligibility under TANF;*
- *Single-parents (including single pregnant women);*
- *Long-term unemployed individuals;*
- *Other groups determined by the Workforce Board to have barriers to employment.*

During meetings with new and current businesses the local office Business Service Representative (BSR) will confer with the hiring manager on positions, in particular, hard to fill positions. The BSR will strategize to inquire if the employer is willing to train an appropriate candidate for a position. The BSR will give an overview of OJT opportunities to engage interest, if the employer is interested, they will review the OJT process.

The BSR assists the employer through all phases of creating an OJT, including:

- *Referring vetted, appropriate applicants*
- *Assisting in designing a training plan that meets employer needs*
- *Guidance during the OJT process to ensure a successful outcome*

After an OJT is developed, MHNCCC staff will:

- *monitor the trainees progress throughout the training*
- *provide case management service*
- *provide any wrap around /support services and or referrals as needed*
- *Follow up services will be provided*

Apprenticeships

Similar to identifying OJT opportunities, the BSR discusses with new and current employers the opportunities for viable apprenticeships. The BSR will approach the concept of apprenticeship in particular with hard to fill and easily identifiable typical apprentice opportunities i.e. (electricians, plumbers). This topic is approached with employers during multiple phases of a relationship.

Again, like OJT'S, the BSR with assist the employer through the process in collaboration with Division of Apprentice Standards.

After an apprenticeship is developed, in addition to DAS' follow-up, MHNCCC staff will:

- *monitor the trainees progress throughout the training*

- *provide case management service*
- *provide any wrap around /support services and or referrals as needed.*
- *Follow up services will be provided*

Incumbent Worker Training

The Workforce Training Fund Program (WTFFP) is our primary access point to Incumbent Worker training opportunities.

The BSR will discuss this funding with employers and make suggestions, if appropriate, about training that an employer may need. If there is an interest in the program, the employer will be referred to a grant writer through Mount Wachusett Community College, as this is our local area expertise for this program. The BSR can also make recommendations and referrals to other grant writing entities.

The BSR will coordinate with the grant writing entity and the employer for any additional follow-up questions or needs while going through this process. If the employer submits for an award the BSR and the local Board will review the submittal for alignment with the areas workforce needs.

Once awarded, the BSR will follow up with the employer to be sure the training has commenced and is resulting in the desired outcomes the employer was seeking. Other opportunities through local grants (i.e. Tech Hire) are another access points for providing incumbent worker training to employers. MHNCCC partners with these grant opportunities and provides support in these efforts.

Work Experience

Work Experience is primarily seen in the North Central area through internships. These opportunities can be subsidized or non-subsidized. Knowing the importance of work experience and the opportunities it presents, MassHire North Central Workforce Board and Career Center staff look for these prospects and include them in grant opportunities, guidance through Career Planning with customers in the training selection choice and with our partners.

Through the Career Planning process, counselors will look for programs with internships so that customers have the chance to gain the on-the-job training with classroom instruction, enabling the customer to acquire knowledge, skills and attitudes necessary to enter and/or progress in a chosen occupation.

Knowing the importance of work experience, the MHNCCC had worked with various partners in developing and offering internship opportunities. The MHNCCC had had interns placed at the Career Center from the Department of Transitional Assistance, the

Senior Community Employment Program and Shriver Job Corps.

Transitional Jobs

While the MassHire North Central Workforce Board and Career Center have not had experience with transitional job opportunities, the MHNCCC does organize a bi-yearly job fair in partnership with the Leominster Police Department. This job fair focuses exclusively on job candidates with CORI backgrounds and CORI-friendly employers.

The MassHire North Central Workforce Board will work to coordinate with local and regional re-entry programs to make sure that re-entry program personnel are well informed on Career Center programs, training opportunities and grant initiatives.

Online Remediation Tools

The MHNCCC utilizes the Career Ready 101 curriculum. Staff have been trained in WorkKeys, however, it was during the ACT transition in the Fall/Winter 2017.

Although CR101 is being phased out, staff are utilizing it with customers in a workshop setting and using results to identify and address through potential training gaps in basic skills, abilities and job-ready qualifications.

The MHNCCC will be requesting additional training and making the full transition to WorkKeys over the Winter/Spring 2019. Currently, the MHNCCC BSR is gathering best practices to better utilize this tool with employers and will be developing a plan to educate employers on its potential for vetting employees, etc.

(21) Please describe the process used by your Board, consistent with WIOA sec. 108(d), to provide up to a 30-day public comment period prior to submission of the plan, including an opportunity to have input into the development of your local plan, particularly for representatives of businesses, education, and labor organizations.

a). make available copies of a proposed local plan to the public through electronic and other means, such as public hearings and local news media;

The MassHire North Central Workforce Board, as part of the review process for submission of the plan, will offer review through access to an electronic copy of the plan via www.masshirenorthcentralwb.com. There will be link identified on the page that will guide viewers to the plan. Responses to the plan can be emailed to jroberge@masshirenorthcentralwb.com or through mail at MassHire North Central

Workforce Board, 100 Erdman Way. Leominster, Ma 01453. Tel. 978-786-9636. Hard copies of the plan will be available for review at the Board Offices located at the same address. All Board members and stakeholders will be notified by email that the plan is available for review and will be encouraged to respond.

Additionally, notification that the plan is available for review will be provided via the Boards LinkedIn group page: <https://www.linkedin.com/groups/12152591/> as well as the Boards Facebook page: <https://www.facebook.com/MassHire-North-Central-Workforce-Board-549440808813278/>.

b). allow members of the public to submit comments, not later than the end of the 30-day period beginning on the date on which the proposed local plan is made available;

In all modes of communication to the public regarding the Board Plan, a minimum of 30 days will be made available for public comment. Included in the notification to the public, it will state that responses must be received within thirty days. The last day to submit a response will be provided as part of the notification. Any responses received by the Board will be acknowledged in writing to the sender.

c). include with the local plan submitted to the Governor any such comments that represent disagreement with the plan

Any comments submitted to the Board will be included with the plan submission. All comments will be provided as an attached document to the plan and will include the date of receipt, sender's name and Title (if applicable). The date of the board acknowledgment of receipt will also be included.

(22) Describe how your Career Centers are implementing and transitioning to an integrated, technology-enabled intake and case management information system for programs carried out under WIOA and by system partners.

At this time, work continues to be done with all WIOA partners in the development of Workforce Connect-a single access dashboard that will allow for streamlined referral and information sharing amongst all workforce partners. As part of that ongoing development, the Center and Board are keeping staff/stakeholders informed on changes, timelines and potential beta-testing rollout of the case tracking system.

(23) What is the direction given by the Governor and your local Board to the career center operator to ensure priority for adult career and training services will be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient consistent with WIOA sec. 134(c)(3)(E) and § 680.600 –

POS for Veterans: <https://www.mass.gov/service-details/priority-of-service-for-veterans>

State Plan: <https://www.mass.gov/files/documents/2018/02/09/ma-wioa-state-plan-final-4-7-16.pdf>

Please describe the local board's policy and process related to Priority of Service for adult career and training services for recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient (100 DCS 08-116).

WIOA requires priority of service to be provided for designated populations as well as core partner "shared customers". The following outlines populations to receive priority service based on the State policy guidelines and the WIOA local MOU submitted to the state by the MassHire North Central Workforce Board.

In accordance with Mass Workforce Issuance 100 DCS 18-101C priority for WIOA Title 1 Adult Services must be given to individuals meeting the following criteria:

- *Recipient of Public Assistance*
- *Other Low Income Individuals*
- *Individuals who are basic skills deficient*

In addition, Issuance 100 DCS 18-101C indicates all Veterans are to receive priority service for all Department of Labor funded training programs provided they meet program eligibility criteria. Priority of Service for Veterans policies and

procedures regarding priority of service align with the Jobs For Veterans Act.

The MassHire North Central Career Center's Standard Operating Procedures (SOP) outline necessary elements for both the preliminary screening (completed at triage) as well as the comprehensive assessment process for customers advancing to case management status and potentially seeking individualized services under Title I of WIOA or a specialized MassHire center program. These procedures ensure that all customers complete critical steps of the job search process.

Preliminary Screening/assessment:

Priority Population Screening

Individuals are screened to evaluate their status in the following priority populations:

- *Veterans*
- *Migrant Seasonal Farm Worker*
- *Recipient of Public Assistance*
- *Other Low Income Individuals*
- *Individuals who are basic skills deficient*
- *Trade Programs (due to deadlines)*
- *Individuals with Disabilities (General Accessibility and Non-Discrimination overview and opportunity to self-disclose)*
- *Shared Customer (currently receiving services from WIOA core partners)*

Initial assessments for all customers include: Educational Assessment, Job Search Materials Screening, Job Skills Assessment, and Barriers Assessment.

Customers who are verified and enrolled in the Title I Low-Income Adult Program in need of individualized case management services receive the following: Career Profile Assessment, Job Skills Assessment, Academic Skills Assessment, Workplace readiness Assessment.

(24) Please describe the local policy and process that ensures priority for adult career and training services is given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient consistent with WIOA sec. 134(c)(3)(E), § 680.600 and 100 DCS 18.101.1 (Attachment C) in the absence of a priority of services policy.

- Veterans and eligible spouses
- Recipients of public assistance
- Other low-income individuals
- Individuals who are basic skills deficient

The Local Board may establish a process that also gives priority to other individuals eligible to receive such services outside the groups given priority under WIOA, provided that it is consistent with the priority of service for Veterans. Please note the local policy and process must be consistent with WIOA sec. 134(c)(3)(E) and § 680.600 in the absence of a priority of service policy.

WIOA requires priority of service to be provided for designated populations as well as core partner “shared customers”. The following outlines populations to receive priority service based on the State policy guidelines and the WIOA local MOU submitted to the state by the MassHire North Central Workforce Board.

Section 3 of the locally negotiated MOU identifies the following Priority Populations within the North Central Region:

- *Unemployed Insurance Claimants*
- *Low Income Adults, including TANF and SNAP recipients*
- *Homeless, including Homeless Veterans*
- *Adult Education participants (Title II)*
- *Individuals with Disabilities (Vocational Rehabilitation Title VI)*
- *Veterans*
- *Older Workers*
- *Reintegration Population*
- *Youth, including youth with barriers to employment*
- *Trade-due to deadlines for benefits*

The MassHire North Central Career Center’s Standard Operating Procedures (SOP) outline necessary elements for both the preliminary screening (completed at triage) as well as the comprehensive assessment process for customers advancing to case management status and potentially seeking individualized services under Title I of WIOA or a specialized MassHire center program. These procedures

ensure that all customers complete critical steps of the job search process.

(c) **Your local plan must include any additional information required by the Governor.**

(d) **Your local plan must identify the portions that the Governor has designated as appropriate for common response in the regional plan where there is a shared regional responsibility, as permitted by § 679.540(b):**

The Governor may issue regional planning guidance that allows Local Boards and chief elected officials in a planning region to address any local plan requirements through the regional plan where there is a shared regional responsibility. Incorporate anything from your Regional Plan content as appropriate.

(e) **Comments submitted during the public comment period that represent disagreement with the plan are required to be included with your local plan.**