

Columbia-Greene LWDA

Local Plan

July 1, 2021 – June 30, 2025

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Strategic Planning Elements

Local Workforce Development Areas (LWDAs) and Regional Demand Lists are now maintained online. Changes to the Demand Lists can be made by following the directions on the webpage.

I attest that the priority ranked list of the LWDA’s demand occupations was last updated on [specify date in the text box below].

5/25/21

How is this information shared with the Local Workforce Development Board (LWDB)? What was the last date on which it was shared?

The full Board approved the Columbia Greene Demand Occupation list at their January 2020 meeting. The updated Demand Occupation list was reviewed at the May 2021 WDB Business Services Committee Meeting. The WDB Executive Committee will review on June 23, 2021, and the approved document will be shared with the Board and posted on the website by July 1, 2021.

a. Provide an analysis of regional economic conditions, including:

i. Existing and emerging in-demand sectors and occupations; and

Current local in-demand industry sectors include health care & social assistance, manufacturing, financial services, construction, and hospitality. In addition, there are occupational areas that cross a variety of sectors including information technology and transportation related jobs.

ii. The employment needs of businesses in those sectors and occupations.

Post pandemic, entry level jobs have become even harder for businesses to fill in all the industry sectors. Skilled jobs (above the laborer level) in the construction trades, all levels of nursing in the healthcare field, mechanically trained workers in the manufacturing sector, are all in-demand in the local area.

b. Describe the knowledge, skills, and abilities needed to meet the employment needs of businesses, including those in in-demand sectors and employing individuals in demand occupations.

The nursing/medical field requires state credentials. Advanced manufacturing and the trades require physically fit individuals with math, reading and mechanical proficiencies. Required skills for tourism positions include customer service, communication, and computer skills.

c. Provide an analysis of the regional workforce, including:

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i. Current labor force employment and unemployment numbers;

The current annual average size of the regional labor force in the Capital Region is close to 550,000 people, with around 52,000 of those workers residing in the Columbia-Greene area. The unemployment rate, regionally and locally, over the last year has fluctuated widely due to the impact of Covid-19 from 4% in January of 2020 to 14% in April of 2020 returning to 5% in April of 2021.

ii. Information on any trends in the labor market; and

The size of the labor force is decreasing and is projected to continue to decline based on the retirement of the Baby Boom generation. Locally, population growth is stagnant with fewer new full-time residents moving into the area. The Columbia Greene area has a lot of second-home owners, many from the NYC area, but a high percentage of these new residents are not part of the local labor force.

iii. Educational and skill levels of the workforce in the region, including individuals with barriers to employment.

The education and skill levels of the regional workforce tend to mirror the education levels of the nation. However, with the strong current employment picture in the region the pool of available job seekers tends to have less formal education. In Columbia-Greene last year 58% of our job seekers had a high school diploma or less, and only 24% had an Associate's degree or higher. Many of these job seekers also have other barriers to obtaining employment at a self-sufficient level, including an identified disability or status as an ex-offender.

d. Provide an analysis of workforce development activities, including education and training, in the region.

i. Identify strengths and weaknesses of these workforce development activities.

The educational opportunities available in the Capital Region are strong and varied. The K-12 system is vibrant and includes some P-Tech options. The three regional BOCES provides vocational training at the high school level, preparation programs for the Test Assessing Secondary Completion, and classes for English language learners. There are many public and private colleges and universities, offering degrees in practically every occupation. There are also four community colleges in the region offering numerous certificate and associate degree programs relevant to our local industries. The educational system is rounded out by some non-credit programs offered by Community Colleges, adult vocational education programs sponsored by BOCES, and private trade schools. These programs tend to provide the skills needed in many in-demand low and middle skill occupations.

The Columbia-Greene area is served by one community college (Columbia-Greene (CGCC)) and one BOCES (Questar III). CGCC offers a variety of programs that serve our in-demand sectors, including health care & social assistance, financial services, construction technology, and information technology. Also, many of their business programs address

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the hospitality industry. Questar III has programs related to manufacturing, health care, construction, and hospitality.

The Columbia-Greene Career Center offers a variety of workforce services providing career planning, vocational assessment, skill development and job search services. The Workforce Development Board has designated Columbia-Greene Community College, the local grant recipient/fiscal agent, as a youth services provider for all youth program elements, offering TASC preparation, internships, and all the other required youth program elements. The WDB has also kept the option to procure additional providers for youth program element services.

The weaknesses of the system for Columbia and Greene County residents are both the rural nature of our area and the traditional operation matrix utilized by our local educational institutions. The lack of a large customer base and the issues surrounding the limited public transportation options place large obstacles in front of our education partners as they contemplate creating innovative training options. For our customers, the transportation issue can limit their educational choices to local options, somewhat limiting their training choices.

- ii. Does the local area have the capacity to address the education and skill needs of the local workforce, including individuals with barriers to employment, and the employment needs of businesses? Please explain.

The local area has the systems in place to address the educational needs of the workforce. However, the ability to implement special training options to address the individual needs of all workers and businesses is limited due to the lack of financial resources. Creating special programs for individuals with barriers to employment or businesses with specific training needs is costly. Sometimes special grants can be obtained, but other times they cannot.

- e. Describe the LWDB’s strategic vision and goals for preparing an educated and skilled workforce, including youth and individuals with barriers to employment.

The Columbia-Greene Workforce Development area’s strategic vision is of an integrated economic and workforce development system that provides an environment for success for both business and workers while dealing with the ever-increasing changes in technology, markets, and high-performance workplaces.

The Columbia-Greene Workforce Development Board works to promote innovation and alignment among the employment, training, and education programs in our area to ensure that all individuals, including youth and individuals with barriers to employment, have the skills they need to be employable and that companies have the trained workforce they need to be successful in the world marketplace.

- i. How do the local area’s workforce development programs, including programs provided by partner agencies, support this strategic vision?

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The Workforce Development Board's strategic vision is supported by the efforts of all the local partners to offer coordinated and non-duplicated services to assist job seekers and businesses.

While Covid-19 related closures and restrictions have prevented many workforce development programs from functioning as intended, typically there are several organizations available in the local area that have defined relationships and customer referral arrangements in place. The Columbia-Greene Career Center is located on the Community College campus. Besides housing WIOA Title I programs, the Career Center is also home to NYSDOL programs, including Wagner Peyser and TAA. ACCES-VR and Adult Education/TASC programs are also available on a part-time basis at the Career Center. All these agencies working together ensure that all program's customers are aware of available services.

Career Center staff provide individualized counseling services to customers to ensure they understand how the skills they currently have fit with the local labor market and how an investment in education and training could improve their employment prospects and provide the opportunity for wage growth and income stability.

Customers are provided direct access through referrals to programs that can provide training at a post-secondary level that leads to recognized credentials, as well as programs that can provide tuition assistance for those training programs. Customers, of all ages, that need their high school diploma, or English Language learners can also receive a direct referral to appropriate education programs and/or on-the-job training or work experience programs to help prepare them for the workforce. Non-co-located partners, such as the Departments of Social Services and local Community Action agencies are also part of our referral network. Since 2018, local partners have been meeting quarterly to share resources, work on projects, participate in shared training and tighten the local referral process.

- ii. How will the local area, working with the entities that carry out the core programs, align available resources to achieve the strategic vision and goals?

The Columbia-Greene Workforce Development Board and the One-Stop Operator will continue to work on strengthening the service alignment between all local WIOA and other workforce related programs. The WDB By-laws have standing committees for the purpose of supporting service coordination between business and partner programs. These committees include one focused on Business Services and one focused on Career Services. Non-board members are encouraged to serve on these committees, so all core programs are represented through this structure and meet on at least a quarterly basis.

Membership on the Business Services committee includes local business WDB members, staff from our local economic development agencies, Business Service Representatives from NYSDOL and the Career Center, a representative from Columbia-Greene Community College, and representatives from our local Community Action agencies. Part of what this committee focuses on includes: determining the needs and expectations of business customers as they pertain to the workforce development system and to promote the system to employers; aligning workforce services with any new or on-going economic

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development efforts; developing business partnerships and determining how local workforce development resources can best be utilized to meet the emerging and on-going needs of our local business community; reviewing labor market information for the purpose of identifying current and future labor force requirements of local and regional businesses; identifying and supporting sector strategy initiatives for the local area; and supporting career pathways that expands employment and career advancement opportunities.

Membership on the Career Services committee includes representatives from all the local WIOA core programs, the local one-stop operator, both counties' Departments of Social Services, as well as local business WDB members. This committee's mission is to work towards developing an integrated workforce development system that offers a seamless employment, education and training system that meets the needs of all job seekers. To enhance the local provision of services this committee coordinates the activities of the providers of WIOA Title I, providers of adult education and literacy services, the providers of career and technical education, and the local agencies providing vocational rehabilitation services.

- f. Describe the LWDB's goals relating to performance accountability measures. How do these measures support regional economic growth and self-sufficiency?

The Columbia-Greene Workforce Development Board (WDB) understands that the WIOA performance accountability measures focus the workforce system on providing customers with long term solutions that will improve their employment and economic situation. Therefore, the WDB's goals include supporting a service delivery system that emphasizes skill development, educational attainment, and vocational training. The Board recognizes that sector strategies and career pathway development will support economic growth and help lead low-income residents to financial self-sufficiency.

Local Workforce Development System

- a. Identify the programs, whether provided by the Career Center or any partners, that are a part of the local area's workforce development system, including:
 - i. Core programs;

Columbia-Greene Community College is the fiscal agent and service provider for WIOA Title I programs (Adult, Dislocated Worker, and Youth)

NYS Education Department contracts with Questar III BOCES to offer Adult Education and Family Literacy Act programs under Title II of WIOA

NYS Department of Labor offers the Wagner-Peyser program (Title III of WIOA),

NYS Education Department through ACCES-VR offers Vocational Rehabilitation Title IV of WIOA

Office of Children and Family Services/NYS Commission for the Blind also offers Vocational Rehabilitation Title IV of WIOA

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- ii. Programs that support alignment under the Carl D. Perkins Career and Technical Education Act of 2006; and

The NYS Education Department contracts with Columbia-Greene Community College to offer Career & Technical Education (CTE) - postsecondary level under Perkins Career and Technical Education Act

- iii. Other workforce development programs, if applicable.

The NYS Department of Labor also offers the Trade Adjustment Assistance (TAA) program- Title II of Trade Act, the Jobs for Veterans State Grants - Title 38, U.S.C., and the State Unemployment Insurance program.

PathStone Corporation offers the Migrant & Seasonal Farmworker Programs (MSFW) under WIOA Title I to the local area and the Senior Community Service Employment Program (SCSEP)— Title V of Older Americans Act to Columbia County residents

Associates for Training and Development, Inc. (ATD) offers Greene County residents the Senior Community Service Employment Programs (SCSEP)— Title V of Older Americans Act

Office of Children and Family Services/NYS Commission for the Blind offers Vocational Rehabilitation—Title IV of WIOA

Columbia Opportunities, Inc. offers Community Services Block Grants (CSBG) employment & training programs to Columbia County residents

Community Action of Greene County offers Community Services Block Grants (CSBG) employment & training programs to Greene County residents

Glenmont Job Corps offers Job Corps under Title I of WIOA

Columbia County Department of Social Services offers Temporary Assistance for Needy Families (TANF) Employment & Training -Part A of Title IV of Social Security Act services

Greene County Department of Social Services offers Temporary Assistance for Needy Families (TANF) Employment & Training - Part A of Title IV of Social Security Act services.

- b. Describe how the local area will ensure continuous improvement of services and service providers.

The process for continuous improvement of services is embedded in the Workforce Development Board's Career Services Committee. This committee includes membership from all local partners and is responsible for conducting programmatic oversight of the one-stop delivery system. This includes reviewing program performance measures, ensuring that program focus remains on customers with barriers to employment, annually assessing the physical and programmatic accessibility of the local career center, determining how to improve customer referral systems, implementing cross-agency staff development opportunities, and assisting with the certification process of the one-stop operator.

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can become a Certified Nurse Assistant, and add skills like Phlebotomy Technician, and ECG Technician that will open more employment doors.

Access to Employment and Services

- a. Describe how the LWDB and its partners will expand access to employment, training, education, and supportive services for eligible individuals, particularly individuals with barriers to employment.

The goal of the local workforce system is that all customers, enrolled in any of the WIOA core programs, have access to the employment, training, education, and supportive services they require to reach their employment goals, regardless of any barriers they may face. Expanded access for participants with barriers to employment will occur through the principles of our local referral system. This includes:

All partners agreeing to offer customers information on how to apply for a partner's services and/or arrange an appointment for the customer. These connections will ensure that the customer gets accurate program information directly from staff of the programs in question.

Identifying a partner referral liaison for each system partner.

Providing ongoing training to all frontline staff in the services and eligibility requirements for all partner programs.

Agreeing to communicate regarding the status of interagency referrals.

Continually reviewing and improving agreed-upon standards and protocols for making quality referrals between program partners.

All customers that are enrolled in WIOA partner programs will be provided with written information about all the workforce preparation services that are available in our local area. Participants with barriers to employment will have immediate access to job placement and short-term skill development training offered directly at the Columbia-Greene Workforce NY Career Center. Participants will be enrolled in the OSOS and Job Zone job matching systems so they can immediately begin receiving appropriate job leads. They will also be able to attend a variety of job search workshops covering topics ranging from finding job leads, handling job interviews, resume development, and using social media. Additionally, participants will have access to career planning, skill assessment services, and short-term pre-vocational skill training. They will be issued a six-month license for Metrix on-line learning, where they can access thousands of courses. There are courses available that can help participants with the skills needed for the TASC exam, as well as courses that can help develop the skills needed for the participant's identified career interests. Courses are available in a variety of occupational areas including sales, administrative/clerical, information technology, and manufacturing.

Any WIOA participants between the ages of 16 and 24 will also have access to WIOA Title I youth services, including placement in short-term paid internships. Most youth

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internships are designed to begin the participant on the career path of their choosing, and to lead to permanent employment at the supporting business.

Career Center staff will also work with WIOA participants interested in vocational training to find the most appropriate options available for them to reach their career goal. An Individual Employment Plan will be developed outlining details of the training plan, including the timeframe, costs, financial aid sources, and other resources available to meet any supportive service needs. Local WIOA Title I funds can be made available for tuition fees; assistance with uniforms or other appropriate work attire; assistance with books, fees, and school supplies; payments and fees for employment and training related applications, tests, and certifications; and tools or instruments. Referrals to other agencies will be made for assistance with transportation; child care; dependent care; housing; and legal aid services.

- b. Describe how the local area will facilitate access to services through the One-Stop delivery system, including remote areas, through the use of technology.

The Columbia-Greene area hosts a website: www.columbiagreenetworks.org. Through that website customers can access a variety of on-line services. Links to Career Zone and Job Zone are provided for career planning and job search/job matching. There are also links to the websites of all other required and optional partner programs. In addition, there is information on a variety of topics, including career planning, labor market information and job search. PowerPoint trainings are posted, with topics ranging from "Navigating USA Jobs" to "Professional Benefits of Social Media". Customers can also send emails to the center through the website, which not only facilitates communication, but is used to provide resume preparation services and the set-up of practice job interviews through Interview Stream. Customers can also obtain skill development services on-line through Metrix Learning and links to other educational websites.

Throughout the Covid-19 pandemic the Columbia-Greene area has used video conferencing software to engage with customers that could not meet in person and provided a variety of virtual workshops to customers on a wide range of topics including "Resume Writing" and "Searching for a Job Online". Eligible customers have also been given access to Coursera online training in addition to Metrix Learning.

- c. Describe how Career Centers are implementing and transitioning to an integrated technology-enabled intake care management information system.

Both WIOA Title I and WIOA Title III use the One Stop Operating System (OSOS) for intake, case notes, and the documentation of services and outcomes.

- d. Provide a description and assessment of the type and availability of programs and services provided to adults and dislocated workers in the local area.

Adults and Dislocated Workers in the Columbia-Greene area are provided a full array of basic career services, individualized career services, and follow-up services. Access to vocational training services are also available.

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Basic career services include: eligibility determination for WIOA Title I; outreach to UI claimants; initial assessment of skills, work history, and service needs; labor exchange and other job search services; referrals to other appropriate workforce development programs; up-to-date information on the local and regional labor market; information on eligible training providers; information on the performance of the Career Center; information on the availability of supportive services; assistance in determining eligibility for financial aid for training; and, information on filing a UI claim.

Individualized Career Services include: comprehensive and specialized assessments; the development of individual employment plans (IEP); career counseling and planning; short-term pre-vocational services; workforce preparation activities; financial literacy services; out-of-area job search assistance and relocation assistance; internships and work experiences that are linked to careers; and English language acquisition and integrated education and training programs.

WIOA training services are offered through the Individual Training Account (ITA) system for occupations that are in-demand and that offer the opportunity for adults to increase their income to a self-sufficient level and for dislocated workers to at least have the opportunity to match their previous income.

Follow-up services, such as career and job success counseling are available to customers for 12 months after their first day of new employment.

Access to all these services is provided by the Workforce NY Career Center at Columbia-Greene Community College. Most of the the basic career services are designed to be easily obtained in the Resource Room. It offers customers up-to-date computers, software packages (including Microsoft Office, WinWay Resume and a Typing Tutors), and high-speed internet access. Printers, copy, and fax machines are also available. This set-up allows customers to conduct their job search, research the labor market, and learn about available workforce, financial aid, Unemployment Insurance benefits, and other support services in the area. Staff are available to assist customers in getting the full benefits from these basic career services.

Additional labor exchange services are also available on a regular basis. Single and multi-business recruitment events are offered on a weekly and monthly basis at the Center and/or through a virtual platform. An annual Career Fair with over 60 businesses in attendance is also sponsored by the Career Center.

Individualized career services are offered through individual appointments and workshops offered by Career Counselors and Employment Advisors. All customers that request more than self-service receive assessment services that results in a recommended service plan. People who are job search ready are advised to attend workshops covering such topics as job search basics, resume development, job interviewing skills, basic computer skills for job search, and using social media. Customers can also meet individually with a resume development specialist.

Customers that are determined to not be ready for their job search have an Individual Employment Plan (IEP) developed. The plan can include: comprehensive and specialized

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skill assessment using on-line Proveltl skill tests; career planning services using Job Zone and Career Zone; workforce preparation, short-term skill development, and financial literacy services through workshops on Microsoft and Google applications and/or Metrix on-line learning licenses. The IEP may also include connection to vocational rehabilitation services, or classes to prepare for the high school equivalency test, or classes for English for Speakers of Other Languages, or to vocational training services through the ITA system and/or other financial aid sources.

- e. Describe how workforce activities will be coordinated with the provision of transportation, including public transportation, and appropriate supportive services in the local area.

The lack of public transportation in our rural area is always an issue that limits not only access to the Career Center, but also access to other workforce preparation services, and job opportunities for many of our most in-need residents. The Career Center and other workforce program partners are constantly looking for solutions to this problem. Currently, the Columbia County Department of Social Services will bring their clients to the Career Center for initial appointments. In Greene County the Department of Social Services will provide transportation for their customers to come to the Career Center. In 2019, Greene Transit started the Teal Bus Route which connects Columbia and Greene Counties. This route stops at the college, the train station, and the hospital several times a day, Monday through Friday. A new App became available in January of 2020 which allows users to buy passes online and use GPS to track the location of the bus and the exact arrival time. In 2019, the WIO has shared information on 511NY Ride Share to offer ride share/carpooling options as this NYSDOT program expands to upstate counties. These programs were put on hold during COVID but are slowly returning to our area.

The Career Center varies its schedule of activities to allow public transportation riders to avail themselves of all services sponsored by the Center. In addition, Career Center staff will offer some services and activities at other locations within the service area for customers that cannot come to the Career Center. Options for remote and/or virtual services grew tremendously during 2020 as the WIO and partners sought safe ways to connect with job seekers and businesses.

The Career Center will work with businesses and business partners to identify and implement appropriate supportive services to businesses. Supportive services may include but are not limited to assisting businesses in providing transportation and childcare to employees, assisting businesses with timely and appropriate training to support employee and business development, or subsidies to these services. The businesses of the local area have been hard hit by COVID, and with most businesses in the Columbia-Greene LWDA having fewer than ten employees, the need for supportive services to businesses has never been greater.

- f. Describe the replicated cooperative agreements in place to enhance the quality and availability of services to people with disabilities, such as cross training to staff, technical assistance, or methods of sharing information.

The Service Delivery Memorandum of Understanding outlines our area's plan to develop structured cross-trainings for staff and confidentiality agreements for the sharing of

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customer information. Representatives from Vocational Rehabilitation will provide staff located at the Career Center and other partner organizations with training specific to providing quality service to customers with disabilities.

- g. Describe the direction given to the One-Stop System Operator to ensure 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.

The Columbia-Greene Workforce Development Board has passed resolutions regarding the priority of service for the above-mentioned groups. The One-Stop Operator is responsible for developing policies and procedures that ensure that staff of the Career Center comply with the implementation of all WDB resolutions. Periodically WDB members complete a compliance review of official policies

- h. Describe how One-Stop System Operators and One-Stop partners will comply with the nondiscrimination requirements of the Workforce Innovation and Opportunity Act (WIOA) (section 188), and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding:

- i. The physical and programmatic accessibility of facilities, programs, and services;

All buildings on the Columbia-Greene Community College campus are in compliance with the Americans with Disabilities Act. This includes numerous handicapped parking spaces, automatic exterior door entrances, handicapped accessible bathrooms, and Braille room signs.

- ii. Technology and materials for individuals with disabilities; and

The college has a variety of assistive technology devices available for customers of the Career Center. They include:
An Internet-connected computer equipped with special hardware and software for those with physical mobility, vision, and/or hearing issues.
A TDD/TYY phone number: (518) 828-1399
Four-track, variable speed tape players to play books on tape.
A talking calculator
A raised line drawing kit
A hearing Helper Personal Fm Amplifying System

- iii. Providing staff training and support for addressing the needs of individuals with disabilities.

Columbia-Greene Community College has an Office for Accessibility Services. The Director of this office provides periodic campus wide training and is also available on an individual basis to provide guidance and direction to Career Center staff to ensure that any customer with special needs is provided quality services.

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- iv. Describe the roles and resource contributions of the One-Stop partners related to the nondiscrimination requirements of WIOA (section 188), and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.).

All one-stop partner organizations are responsible for ensuring that their individual staff are in compliance with WIOA section 188 and with the Americans with Disabilities Act of 1990. The Career Center is housed at Columbia-Greene Community College and that organization provides the resource contributions to ensure legal and facility compliance.

Business Engagement

- a. What strategies and programs, including training programs, will be used to facilitate engagement of businesses, including small businesses and businesses in in-demand sectors and occupations?

The local area facilitates the engagement of businesses with the workforce system through several strategies. These efforts include working to garner commitment to the workforce development cause and offering a variety of services deemed valuable by the business community.

The Columbia-Greene Workforce Development Board recruits business members that either represent the local area's largest business sectors, and/or businesses that employ people in occupations identified as in-demand. These members provide many introductions to other businesses in our area and provide input on the types of services businesses would see value in.

The Columbia Greene Career Center's Business Service Representative coordinates a quarterly Human Resource Roundtable meeting for the two counties, and manages an email communication tool for the group of 125 business owners and human resource managers. The representative is also a board member of the Greene County Chamber of Commerce and a committee member of the Columbia County Chamber of Commerce, Workforce Preparation Committee. In addition, the Representative serves on the College's Business and Technology Advisory Board and has been instrumental in arranging for business owners to provide feedback to the Advisory Board on course content and student preparation for the world of work.

The Representative also promotes the services available through the Workforce Development Institute (WDI) and the Columbia-Greene Community College's SUNY Workforce grant options. This includes arranging and attending meetings between these two organizations and local businesses. Local businesses have obtained grant funding to support employee training, growth, and retention. Businesses that have been targeted include in demand sectors and companies referred by economic development representatives.

- i. If applicable, describe the local area's use of business intermediaries.

N/A

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- b. What strategies or services are used to support a local workforce development system that meets the needs of businesses in the local area?

The Columbia Greene Workforce Development Board and its Career Center offers a variety of services to meet the needs of business. The Career Center assists employers with their hiring needs by promoting the NYS Job Bank and offering space at the Career Center for recruitment events. Individual employers can hold events that can either be held in the Center's offices or can be arranged at a space on the community college campus where the entire student body will see them. Historically, monthly group recruitment events for 8 to 12 businesses are held and are promoted heavily among all partner organizations to get as many job seekers attending as possible. An annual Career Fair is also held, generally with over 80 businesses and agencies attending and at least 300 job seekers coming through the doors. As of 2021, a virtual job fair/interview/meeting platform is available at no cost to local businesses.

Skill development services are offered to businesses' employees through Metrix Learning on-line courses. This is a free service to businesses for employees that are earning less than our local self-sufficiency wage. There are thousands of courses available covering a wide array of business management, computer technology, and manufacturing topics. In addition, when funds are available, On-the-Job Training contracts are offered to businesses hiring new workers in need of training for their new job.

In addition, the local area actively pursues grant opportunities to support workforce training in areas critical to local business. Numerous employers wrote letters of support for our recently obtained grant from the NYS Regional Economic Development Council for funding Commercial Driver's License training at both the A and B level. On multiple occasions, the area has secured funding for projects working cooperatively with our region's other Workforce Development Boards. We have had federal grants that offered enhanced on-the-job and customized training contracts to our business community. We have also obtained grants to develop sector partnerships and career pathways. These local and regional efforts to obtain business focused training grants will continue.

Finally, additional business services are coordinated with the NYSDOL. These include Occupational Analysis, Health and Safety, Tax Credit and Employee Bonding programs. Job Services Employer Committee (JSEC) training offered and planned by local businesses.

- c. Describe how the local area's workforce development programs and strategies will be coordinated with economic development activities.

The Economic Development representatives from both counties are members of the Columbia-Greene Workforce Development Board and serve the Business Services committee. These representatives provide real time labor market information useful in developing priorities and strategies. In addition, the Career Center's Business Service Representative meets with all businesses referred by any of the local Economic Development agencies to offer all the Career Center's business services. In many cases, the Career Center is invited by Economic Development to meet with new businesses moving into the area.

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- i. Describe how these programs will promote entrepreneurial skills training and microenterprise services.

Entrepreneurial or microenterprise training programs are offered by the two counties local economic development agencies. Just as Economic Development refers businesses to us for workforce services, we refer customers to Economic Development for their entrepreneurial training. The Career Center can coordinate that training with additional State related resources and offer customers an on-line Metrix license for related business courses, such as financing, bookkeeping, logistics, inventory control, and customer service.

- d. Describe how the LWDB will coordinate its workforce investment activities with statewide rapid response activities.

The local Board and the Columbia Greene Career Center receive all Rapid Response layoff reports that occur in our region. This provides the opportunity to track trends that may be occurring in different industry sectors. Our Business Service Representative attends all Rapid Response events that are held with businesses in the two counties to ensure that affected individuals learn about the services available at the Career Center. In addition, the Business Services Representative notifies related local businesses that may be interested in hiring laid-off workers from a Rapid Response event.

Program Coordination

- a. How do the local area’s programs and strategies strengthen the linkages between the One-Stop delivery system and unemployment insurance programs?

The Columbia-Greene Career Center provides customers with general information on the requirements for filing an Unemployment Insurance claim, along with specific instructions on the steps to take to file a claim. We provide telephonic and on-line resources to help individuals connect with the Unemployment Insurance Division. We also provide information on how to file a UI hearing request, and often help individuals fill out paperwork associated with their Unemployment Insurance claims, such as the Request for Reconsideration and Alternate Base Period information.

The Career Center connection with the UI Division is strengthened through the Re-Employment Services and Eligibility Assessment (RESEA) Grant. The program provides methods for identifying individuals with potential barriers to re-employment and individuals profiled as “likely to exhaust” benefits. Job search services and case management activities are implemented to try to lessen their duration on Unemployment Insurance, and to also ensure that issues that may affect their continuing eligibility are addressed.

- b. Describe how education and workforce investment activities will be coordinated in the local area. This must include:
 - i. Coordination of relevant secondary and postsecondary education programs;

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The Workforce Development Board (WDB) and the Career Center coordinate effectively with all the educational institutions in our service area. At the secondary level we work with all area high schools to ensure they are aware of the youth services provided, including TASC preparation programs for recent dropouts, and summer youth employment programs for their students. Direct referral systems are in place. The WDB's Youth Council also reserves two membership seats for local Superintendents to ensure their input on the selection of youth service providers.

There is also a strong relationship with our local BOCES, Questar III. Referral processes are in place for all the TASC, and English as a New Language (ENL) classes offered by the school. In fact, one of the TASC classes is held at the Career Center. In addition, whenever Questar III sponsors adult vocational training programs the WDB assists them in the acceptance process for placement on the Eligible Training Provider list.

At the post-secondary level, Columbia-Greene Community College is the fiscal agent for WIOA Title I and is home to the comprehensive Career Center. In addition, a Career Center staff member serves on the Local Advisory Committee for the Career & Technical Education under Perkins Career and Technical Education Act.

- ii. Activities with education and workforce investment activities to coordinate strategies and enhance services; and

Improving the connection between education programs and workforce services in the Columbia Greene area focuses on ensuring that students who are enrolled in adult education or community college non-credit and degree programs are aware of the workforce services available that can either enhance their educational experience or improve their employment results upon graduation. Efforts are also underway to co-enroll TASC and ENL students interested in obtaining employment or continuing their education.

- iii. A description of how the LWDB will avoid duplication of services.

The WDB and its Committees includes membership of all WIOA partners. The communication processes that are in place ensure that all Partners know the programs and services provided by each organization. Because of our area's small size and the limited number of educational services and resources available, collaboration is easily facilitated to avoid the duplication of services. A brochure of services of all local WIOA partners was created in 2019 and is used for coordination and referrals.

- c. Describe plans, strategies, and assurances concerning the coordination of services provided by the State employment service under the Wagner-Peyser Act (29 U.S.C. 49 et seq.), to improve service delivery and avoid duplication of services.

The Columbia-Greene Career Center is operated as a joint effort between WIOA and Wagner-Peyser funded staff to ensure coordination and non-duplication of services between our two organizations. The Center operates by following a single policy and procedure manual that is continually updated and provides detailed instructions on the services to be provided and the processes to be followed. Utilizing this system provides

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quality control and helps highlight possible service gaps or outdated procedures, and leads to a continuous improvement system for the Career Center.

- d. Provide a list of executed cooperative agreements that 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 the local Career Center System. This includes agreements between the LWDB and entities that serve individuals eligible under the Rehabilitation Act. If no such agreements exist, provide an explanation why this is the case and/or progress towards executing such agreements.

The Columbia Greene area utilizes the Service Delivery Memorandum of Understanding to define how local partners will carry out the coordination of and access to all workforce services in our community. Membership on the Career Services Committee of the WDB includes representatives of all local WIOA partners, including of WIOA Title I, Adult Education - Questar III, Wagner-Peyser, Acces VR, Greene and Columbia Counties Departments of Social Services, and Greene and Columbia Counties Community Action agencies.

Title II Program Coordination

- a. Provide a description of the LWDB's strategic vision and goals for preparing an educated and skilled workforce, specifically addressing how to improve access to activities leading to a recognized post-secondary credential, as well as other strategies for serving out-of-school youth (OSY) and adults who have low literacy skills, are English Language Learners, or lack a high school diploma or the equivalent.

The Columbia-Greene Workforce Development area's strategic vision is of an integrated economic and workforce development system that provides an environment for success for both business and workers while dealing with the ever-increasing changes in technology, markets and high performance workplaces.

The Columbia-Greene Workforce Development Board works to promote innovation and alignment among the employment, training, and education programs in our area to ensure that all individuals have the skills they need to be employable and that companies have the trained workforce they need to be successful in the world marketplace.

There are several organizations available in the local area that have defined relationships and customer referral arrangements in place. The Columbia-Greene Career Center is located on the Community College campus. Besides housing WIOA Title I programs, the Career Center is also home to NYSDOL programs, including Wagner Peyser and TAA. ACCESS-VR and Adult Education/TASC programs are also available on a part-time basis at the Career Center. All these agencies working together ensure that all program's customers are aware of available services.

Career Center staff provide individualized counseling services to customers to ensure they understand how the skills they currently have fit with the local labor market and how an

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investment in education and training could improve their employment prospects and provide the opportunity for wage growth and income stability.

Customers are provided direct access through referrals to programs that can provide training at a post-secondary level that leads to recognized credentials, as well as programs that can provide tuition assistance for those training programs. Customers, of all ages, that need their high school diploma, or English Language learners can also receive a direct referral to appropriate education programs and/or on-the-job training or work experience programs to help prepare them for the workforce. Non-co-located partners, such as the Departments of Social Services and local Community Action agencies are also part of our referral network.

- b. Provide a description of how the LWDB will expand access to employment, training, education, and supportive services provided through the NYS Career Center System for Title II participants with barriers to employment.

The goal of the local workforce system is that all customers, enrolled in any of the WIOA core programs, have access to the employment, training, education, and supportive services they require to reach their employment goals. Expanded access for Title II participants will occur through the principles of our local referral system. This includes:

- All partners agreeing to offer customers information on how to apply for a partner's services and/or arrange an appointment for the customer. These connections will ensure that the customer gets accurate program information directly from staff of the programs in question.
- Identifying a partner referral liaison for each system partner.
- Providing ongoing training to all frontline staff in the services and eligibility requirements for all partner programs.
- Agreeing to communicate regarding the status of interagency referrals.
- Continually reviewing and improving agreed-upon standards and protocols for making quality referrals between program partners.

All customers that are enrolled in a Title II program will be provided with written information about all the workforce preparation services that are available in our local area. Participants with barriers to employment will have immediate access to job placement and short-term skill development training offered directly at the Columbia-Greene Workforce NY Career Center. Participants will be enrolled in the OSOS and Job Zone job matching systems so they can immediately begin receiving appropriate job leads. They will also be able to attend a variety of job search workshops covering topics ranging from finding job leads, handling job interviews, resume development, and using social media. Additionally, participants will have access to career planning, skill assessment services, and short-term pre-vocational skill training. They will be issued a six-month license for Metrix on-line learning, where they can access thousands of courses. There are courses available that can help participants with the skills needed for the TASC exam, as well as courses that can help develop the skills needed for the participant's identified

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career interests. Courses are available in a variety of occupational areas including sales, administrative/clerical, information technology, and manufacturing.

Eligible Title II participants between the ages of 16 and 24 will also have access to WIOA Title I youth services, including placement in short-term paid internships. Most youth internships are designed to begin the participant on the career path of their choosing, and to lead to permanent employment at the supporting business.

Career Center staff will also work with Title II participants interested in vocational training to find the most appropriate options available for them to reach their career goal. An Individual Employment Plan will be developed outlining details of the training plan, including the timeframe, costs, financial aid sources, and other resources available to meet any supportive service needs. Local WIOA Title I funds can be made available for tuition fees; assistance with uniforms or other appropriate work attire; assistance with books, fees, and school supplies; payments and fees for employment and training related applications, tests, and certifications; and tools or instruments. Referrals to other agencies will be made for assistance with transportation; childcare; dependent care; housing; and legal aid services.

- c. Identify how the LWDB will facilitate the development of a career pathways and co-enrollment in academic training programs.

Encouraging and assisting job seeking customers with continuing their education for the purpose of improving their income potential and work satisfaction levels will continue to be a focus of the Columbia-Greene Workforce Development Board and the Career Center it oversees. The Board will continue to work on developing appropriate career pathway products, and will ensure that all WIOA partner programs are aware of the variety of education and training options available to assist customers, including those individuals with basic skill deficiencies.

The Columbia-Greene WDB was recently involved in a regional project which included the development of a manufacturing sector pathway. This pathway product outlined manufacturing jobs from the entry-level to the management level. Each job listed on the pathway provides: a detailed job description; the education, workforce preparation and work experience required, as well as, the schools in the Capital District area that offer related training programs; the work values satisfied by the position; the regional pay range; the regional employment outlook and examples of local companies that have workers in that position; and, a link to the NYS Job Bank so viewers can find current job openings. The development of the manufacturing pathway highlighted the lack of appropriate training programs at the entry point to the career path. A regional community college has taken the information from our sector report and career pathway product and is currently working to develop a manufacturing "boot camp" non-credit program to fill this training gap.

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It is the intention of the Board to use this same framework in developing other career pathway products for the important industries in our local area. Besides providing useful career planning tools, the process will also help identify training gaps in our area. Career areas under consideration include health care, information technology, construction, and hospitality. Because we anticipate that the training gaps that may exist locally will be for entry level jobs, our education partners will have a blueprint for developing options where customers can co-enroll in academic and vocational training programs.

Currently, in the Columbia-Greene local area students can be dual enrolled in an academic preparation program while also completing vocational training. Examples include Certified Nurse Assistant, Home Health Care Aide, and Commercial Driver’s Licenses preparation programs. In addition, students at Columbia-Greene Community College can complete academic transitional classes while enrolled in numerous certificate and associate degree programs such as business administration, accounting, and information technology, to name just a few.

- d. Provide a description of how the LWDB will support the strategy identified in the State Plan and work with the entities carrying out core programs and other workforce development programs, including those authorized under the Carl D. Perkins Career and Technical Education Act to support service alignment.

The Columbia-Greene Workforce Development Board and the One-Stop Operator will continue to work on strengthening the service alignment between all local WIOA and other workforce related programs. The WDB By-laws have standing committees for the purpose of supporting service coordination between business and partner programs. These committees include one focused on Business Services and one focused on Career Services. Non-board members are encouraged to serve on these committees, so all core programs are represented through this structure and meet on at least a quarterly basis.

Membership on the Business Services committee includes local business WDB members, staff from our local economic development agencies, Business Service Representatives from NYSDOL and the Career Center, a representative from Columbia-Greene Community College, and representatives from our local Community Action agencies. Part of what this committee focuses on includes:

- Determining the needs and expectations of business customers as they pertain to the workforce development system and to promote the system to employers.
- Aligning workforce services with any new or on-going economic development efforts;
- Developing business partnerships and determining how local workforce development resources can best be utilized to meet the emerging and on-going needs of our local business community;

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- Reviewing labor market information for the purpose of identifying current and future labor force requirements of local and regional businesses;
- Identifying and supporting sector strategy initiatives for the local area; and
- Supporting career pathways that expands employment and career advancement opportunities.

Membership on the Career Services committee includes representatives from all the local WIOA core programs, the local one-stop operator, both counties' Departments of Social Services, as well as local business WDB members. This committee's mission is to work towards developing an integrated workforce development system that offers a seamless employment, education and training system that meets the needs of all job seekers. To enhance the local provision of services this committee coordinates the activities of the providers of WIOA Title I, providers of adult education and literacy services, the providers of career and technical education, and the local agencies providing vocational rehabilitation services.

The Committee is also responsible for conducting programmatic oversight of the one-stop delivery system, including reviewing program performance measures, ensuring that program focus remains on customers with barriers to employment, annually assessing the physical and programmatic accessibility of the local career center, determining how to improve customer referral systems, implementing cross-agency staff development opportunities, and assisting with the certification process of the one-stop operator.

Youth Activities

- a. Provide contact details of Youth Point(s) of Contact for your local area including: Name of organization, name(s) of Youth Point(s) of Contact, title, address, phone number, and email address. Youth Point(s) of Contact details are primarily used to refer young adults, parents, and partners about youth programs and posted on the [NYS DOL webpage](#).

Columbia Greene Workforce NY Career Center,
Rebecca Preusser Assistant Director of Youth Services,
4400 Route 23, Hudson, NY 12534
518-828-4181 ext.3113
Rebecca.Preusser@sunycgcc.edu

- b. Provide the number of planned enrollments in PY 2021 for new Out-of-School Youth (OSY), carry-over OSY, new In-School Youth (ISY), carry-over ISY, and work experience. *
- i. New OSY

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50

ii. Carry-over OSY

5

iii. New ISY

0

iv. Carry-over ISY

0

v. Work experiences

10

*Please note that PY 2021 enrollments will provide the baseline estimate for the remaining three years of the Plan.

c. In Attachment F, Youth Services, located on the New York State Department of Labor (NYS DOL) [website](#) under the Local Planning section, identify the organization providing the Design Framework which includes: Intake & Eligibility, Objective Assessments, and Individual Services Strategies (ISS), and 14 Youth Program Elements and whether the provision of each element is contractual, with a Memorandum of Agreement (MOA), or provided by the LWDB.

d. Explain how providers and LWDB staff ensure the WIOA elements:

i. Connect back to the WIOA Youth Program Design Framework, particularly the Objective Assessments and ISS; and

See answers on Page 13 for di and dii

ii. Are made available to youth with disabilities by describing specific program practices, tools, and services that are tailored to serve youth with disabilities.

See answers on Page 13

e. Describe successful models for youth services from your local area, including but not limited to virtual work experiences, OSY recruitment, and engagement strategies.

See answers on Page 13

f. Does your local area plan to serve ISY and/or OSY using the "Needs Additional Assistance" qualifying barrier for eligibility?

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Yes (Attach a Needs Additional Assistance policy that defines reasonable, quantifiable, evidence-based, and specific characteristics of ISY and OSY as described in Technical Advisory (TA) #19-2.

No (Not required to attach a policy)

g. Attach a Basic Skills Deficiency policy of youth program as described in the in TA #19-2.

Administration

a. Identify the entity responsible for the disbursement of grant funds as determined by the Chief Elected Official(s) (CEOs) or Governor.

Columbia-Greene Community College

b. Describe the competitive process to be used to award subgrants and contracts for WIOA Title I activities in the local area.

The Columbia-Greene Workforce Development Board (WDB) is a non-incorporated entity, established by Columbia and Greene counties to set local Workforce Innovation & Opportunity Act (WIOA) policy in partnership with the Chief Local Elected Officials. The WDB is staffed by an independent contractor (WDB Consulting Director).

Columbia-Greene Community College functions simultaneously in a variety of roles related to the administration of Title I of the Workforce Innovation & Opportunity Act for Columbia and Greene Counties. The college is the chief elected officials' policy designee, Fiscal Agent, and the direct provider of career and training services. For Program Year 2017(PY17) to Program Year 2020 (PY20, the college was also selected by the CG WDB to act as the One Stop Systems Operator. Local competition for the One Stop System Operator role is required minimally every four years and will occur again in PY21.

The college's administrative structure and operating procedures, as they relate to the administration of the Workforce Innovation & Opportunity Act, have been established to ensure that the college can carry out its responsibilities while maintaining compliance with WIOA, corresponding regulations, relevant OMB circulars, and NYS conflict of interest policies related to the procurement of goods and services.

These regulations understand that in some local areas governmental structures do not have the capabilities to divide responsibilities among numerous organizations to exclude potential service providers from the entire administrative process. This is the situation at Columbia-Greene Community College as it relates to the management of WIOA. A variety of internal controls are in place to prevent any conflict of interest and to ensure that procurement actions are conducted in a manner that provides for full and open competition and prevents the existence of conflicting roles that might bias judgment and/or cause unfair competitive advantage.

The Consulting Director of the WDB has the responsibility for implementing the competitive process by following standard procurement protocols:

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Request for Proposals (RFPs) will be developed and shall contain a clear and adequate description of the goods and services to be procured; technical requirements, outcomes, and specifications which bidders must fulfill; timeframe for the review of proposals and the awarding of contracts; amount of funds available; and factors to be used in evaluating bids or proposals.

Proposal (RFP) packages shall be sent to potential service providers contained on any established bidders list, as appropriate according to the type of goods and services to be procured. Also, notice of solicitation of RFPs will either be published in local newspapers, posted on the C-CGCC WIO website (columbiagreenetworks.org), or both.

All proposals received in response to a solicitation shall be reviewed by the WDB Consulting Director and/or relevant committee members of the Workforce Development Board, depending on the type of goods and services being sought. Copies of the proposals shall be distributed to all required parties.

The appropriate committee reviewing the submissions will make their award recommendations in the form of a resolution for action by the full Board membership.

All selected bidders will be required to participate in negotiations with the WDB Consulting Director and/or appropriate WDB Committee members. The award of any contract or agreement shall be contingent upon the satisfactory completion of negotiations and the continued availability of funding.

Unsuccessful bidders shall be notified in writing within thirty (30) days of the final decision

- c. Provide the local levels of performance negotiated with the Governor and CEO(s) to be used to measure the performance of the local area and to be used by the LWDB for measuring the performance of the local fiscal agent (when applicable), eligible providers, and the One-Stop delivery system, in the local area.

Listed Below are negotiated performance levels:

Adult:

Employment Rate 2nd Quarter After Exit: 69.5%

Employment Rate 4th Quarter After Exit: 68%

Median Earnings 2nd Quarter After Exit: \$5,300

Credential Attainment 4th Quarter After Exit: 46.9%

Dislocated Worker:

Employment Rate 2nd Quarter After Exit: 67.5%

Employment Rate 4th Quarter After Exit: 65%

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Median Earnings 2nd Quarter After Exit: \$6,500
Credential Attainment 4th Quarter After Exit: 45%
Youth:
Employment Rate 2nd Quarter After Exit: 61.8%
Employment Rate 4th Quarter After Exit 63%
Median Earnings 2nd Quarter After Exit: \$3,000
Credential Attainment 4th Quarter After Exit: 50%

Although we have not yet determined a success level, we will also be measuring the percentage of students who increase their skill levels during their time of participation.

Regarding our business customers, we will also be measuring our business penetration rate and our repeat business customer rate. Success levels have not yet been set for these measures either.

- d. Describe the actions taken toward becoming or remaining a high-performing LWDB, consistent with factors developed by the State Workforce Investment Board (SWIB). The LWDB will be defined as high performing if it meets the following criteria:
 - i. It is certified and in membership compliance;
 - ii. All necessary governance actions and items have been accomplished, including executing a local Memorandum of Understanding (MOU), selecting a One-Stop System Operator, and implementing all required local policies, etc.;
 - iii. All One-Stop Career Centers in the LWDA have achieved at least an 80% score in the Career Center Certification process; and
 - iv. The LWDA meets or exceeds all performance goals.

The Columbia Greene Workforce Development Board has been WIOA compliant with membership as of July 1, 2015, including by laws established and approved by the Chief Local Elected Officials. One Stop Procurement was finalized by June 30, 2017, with both the One Stop Operator Agreement & Internal Controls Agreement in place. An updated MOU has been agreed upon by all local partners and is pending NYSDOL legal review before being finalized. The CG WDB monitors performance and established goals at quarterly meetings. The CG WDB strives to meet or exceed all performance goals and has an excellent record of performance. When adjustments are needed, Performance Improvement Plans are developed and implemented to address issues that may be affecting performance outcomes.

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Training Services

- a. Describe how training services will be provided in the local area. This may include incumbent worker, on-the-job, and customized training programs.

Training services will be offered through our Individual Training Account system. Training vouchers are only approved for programs that are listed on the NYS Eligible Training Provider website. Training must lead to an occupation which is on the Columbia Greene in- demand occupation list.

- b. Describe how contracts will be coordinated with the use of Individual Training Accounts (ITAs).

If the Workforce Development Board determines that there is a need in the community for occupational training that is not available through the ITA system, our procurement procedures will be used to identify a training provider that can offer a training class to meet the community's needs.

- c. Describe how the LWDB will ensure informed customer choice in the selection of training programs regardless of how training services are provided.

The procedures regarding customer choice requirements are outlined in our policy manual. They are also available in our Career Center Catalog of Services customer handout and are highlighted on our website to ensure that all customers are aware of their options. In addition, WDB members conduct semi-annual procedure audits at the Career Center. These audit visits consist of staff interviews to ensure that Center policies and procedures are being followed. Follow up reports are provided to the full board and the Career Center Director.

Public Comment

- a. Describe the process used by the LWDB to provide a period of no more than 30 days for public comment and input into development of the plan by representatives of business, labor organizations, and education prior to submission.

A legal notice is printed in the local newspapers and the plan is posted on the website: columbiagreennetworks.org with instructions provided on how to provide comments.

List of Attachments

Please complete all attachments listed below.

Attachment A – Units of Local Government

Attachment B – Fiscal Agent

Attachment C – Signature of Local Board Chair

Attachment D – Signature of Chief Elected Official(s)

Attachment E – Federal and State Certifications

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Attachment F – Youth Services Chart

Original signature pages for Attachments C, D and E, must be delivered to NYSDOL in one of the following two ways:

- Electronic signature (if the LWDB has the capability for it) – Note that electronic signatures must follow the requirements and guidelines of the Electronic Signature and Records Act ([ESRA](#)). LWDBs choosing to submit signature pages via electronic signature may submit these pages via email with the Local Plan.
- Mail original versions – Hard copies of traditional signature pages may be sent to:

Attn: Local Plan
New York State Department of Labor
Division of Employment and Workforce Solutions
Building 12 – Room 440
W. Averell Harriman Office Building Campus
Albany, NY 12240

All other attachments must be submitted via email with the LWDB Local Plan Template.

In addition to these attachments, LWDBs must provide copies of the agreements listed in the Program Coordination section of this template under [\(d\)](#). If possible, it is preferable to provide a list of hyperlinks to these agreements available on the LWDB website.

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Attachment A: Units of Local Government

Please list the unit or units (multiple counties or jurisdictional areas) of local government included in the local area. If the CEO Grant Recipient has designated a local grant subrecipient to administer WIOA pursuant to WIOA § 107, please indicate the unit of local government that is the grant subrecipient. However, if instead, the CEO Grant Recipient has designated a fiscal agent, please indicate this on Attachment B.

Unit of Local Government	Grant Subrecipient
	Yes
Columbia County Board of Supervisors	<input type="checkbox"/>
Greene County Legislature	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>

§107(6)(B)(i) - When a local workforce area is composed of more than one unit of general local government, the chief elected officials of such units may execute an agreement that specifies the respective roles of the individual chief elected officials.

If your local workforce area is composed of more than one unit of general local government, is there a written agreement between local officials that details the liability of the individual jurisdictions?

Yes No

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Attachment B: Fiscal Agent

WIOA §117(d)(3)(B)(i)(II) indicates that the chief elected official Grant Recipient may designate a local fiscal agent as an alternative to a local grant subrecipient. Such designation to a grant subrecipient or fiscal agent shall not relieve the chief elected official or the Governor of the liability for any misuse of grant funds. If the CEO identified a fiscal agent to assist in the administration of grant funds, please provide the name of the agent.

Fiscal Agent
Columbia-Greene Community College

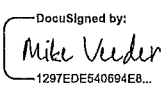
ATTACHMENT C: SIGNATURE OF LOCAL BOARD CHAIR

**Workforce Innovation and Opportunity Act (WIOA) Local Plan for
Program Year 2021-2024, for WIOA Title 1-B
and Wagner-Peyser Programs**

In compliance with the provisions of the Workforce Innovation and Opportunity Act of 2014, the Final Rule, and Planning guidelines and instructions developed by the Governor, this Plan is being submitted jointly by the Local Board and the respective Chief Elected Official(s).

By virtue of my signature, I:

- Agree to comply with all statutory and regulatory requirements of the Act as well as other applicable State and federal laws, regulations, and policies;
- Affirm that the composition of the Local Board is either in compliance with the law, rules, and regulations and is approved by the State or, will be in compliance within 90 days of Local Plan submission;
- Affirm that this Plan was developed in collaboration with the Local Board and is jointly submitted with the Chief Elected Official(s) on behalf of the Local Board; and
- Affirm that the board, including any staff to the board, will not directly provide any career services unless approved to do so by the Chief Elected Official and the Governor.

Date: 7/19/2021	Signature of Local Board Chair:  1297EDE540694EB...	
Mr. <input checked="" type="checkbox"/>	Typed Name of Local Board Chair: Mike Veeder	
Ms. <input type="checkbox"/>		
Other <input type="checkbox"/>		
Name of Board:	Columbia-Greene Workforce Development Board	
Address 1:	PO Box 753	
Address 2:		
City:	Calskill	
State:	NY	Zip: 12414
Phone:	518-731-6878	E-mail: mveeder@kooltemp.com

Submission directions: Complete this attachment as part of the Plan development process and submit it, with original signatures, as described in the Local Plan Template.

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ATTACHMENT D: SIGNATURE OF CHIEF ELECTED OFFICIAL(S)

**Workforce Innovation and Opportunity Act (WIOA) Local Plan for
Program Year 2021-2024, for WIOA Title 1-B
and Wagner-Peyser Programs**

In compliance with the provisions of the Workforce Innovation and Opportunity Act of 2014, the Final Rule, and Planning guidelines and instructions developed by the Governor, this Plan is being submitted jointly by the Local Board and the respective Chief Elected Official(s).

By virtue of my signature, I:

- Agree to comply with all statutory and regulatory requirements of the Act as well as other applicable State and Federal laws, regulations, and policies;
- Affirm that the Grant recipient possesses the capacity to fulfill all responsibilities and assume liability for funds received, as stipulated in §679.420 of the rules and regulations;
- Affirm that the composition of the Local Board is either in compliance with the law, rules, and regulations and is approved by the State or, will be in compliance within 90 days of Local Plan submission;
- Affirm that the Chair of the Local Board was duly elected by that board; and
- Affirm that the board, including any staff to the board, will not directly provide any career services unless approved to do so by the Chief Elected Official and the Governor.

Note: A separate signature sheet is required for each local Chief Elected Official (CEO). If additional pages are necessary, please replicate this document for each CEO.

Date: 9/24/2021	Signature of Local Chief Elected Official (CEO): DocuSigned by: <i>Patrick S. Linger</i> EB002CA06570424...	
Mr. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Other <input type="checkbox"/>	Typed Name of Local CEO: Patrick S. Linger	
Title of Local CEO:	Chairman Greene County Legislature	
Address 1:	411 Main Street	
Address 2:	Suite 408	
City:	Catskill	
State:	NY	Zip: 12414
Phone:	(518) 719-3270	E-mail: legislature@discovergreene.com
Are you the Grant Recipient CEO? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

Submission directions: Complete this attachment as part of the Plan development process and submit it, with original signatures, as described in the Local Plan Template.

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Department
of Labor

ATTACHMENT D: SIGNATURE OF CHIEF ELECTED OFFICIAL(S)

Workforce Innovation and Opportunity Act (WIOA) Local Plan for
 Program Year 2021-2024, for WIOA Title 1-B
 and Wagner-Peyser Programs

In compliance with the provisions of the Workforce Innovation and Opportunity Act of 2014, the Final Rule, and Planning guidelines and instructions developed by the Governor, this Plan is being submitted jointly by the Local Board and the respective Chief Elected Official(s).

By virtue of my signature, I:

- Agree to comply with all statutory and regulatory requirements of the Act as well as other applicable State and Federal laws, regulations, and policies;
- Affirm that the Grant recipient possesses the capacity to fulfill all responsibilities and assume liability for funds received, as stipulated in §679.420 of the rules and regulations;
- Affirm that the composition of the Local Board is either in compliance with the law, rules, and regulations and is approved by the State or, will be in compliance within 90 days of Local Plan submission;
- Affirm that the Chair of the Local Board was duly elected by that board; and
- Affirm that the board, including any staff to the board, will not directly provide any career services unless approved to do so by the Chief Elected Official and the Governor.

Note: A separate signature sheet is required for each local Chief Elected Official (CEO). If additional pages are necessary, please replicate this document for each CEO.

Date: 8/12/2021	Signature of Local Chief Elected Official (CEO): DocuSigned by: <i>Matt Murell</i> 9514322CF59E431...	
Mr. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Other <input type="checkbox"/>	Typed Name of Local CEO: Matt Murell	
Title of Local CEO:	Chairman Columbia County Board of Supervisors	
Address 1:	401 State Street	
Address 2:		
City:	Hudson	
State:	NY	Zip: 12534
Phone:	(518) 828-1527	E-mail: matt.murell@columbiacountyny.com
Are you the Grant Recipient CEO? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

Submission directions: Complete this attachment as part of the Plan development process and submit it, with original signatures, as described in the Local Plan Template.

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Department of Labor

Bidder Organization Name: **Columbia-Greene Workforce NY**

ATTACHMENT E: FEDERAL AND STATE CERTIFICATIONS

The funding for the awards granted under this contract is provided by the United States Department of Labor which requires the following certifications:

A. CERTIFICATION REGARDING DEBARMENT, SUSPENSION, INELIGIBILITY AND VOLUNTARY EXCLUSION-LOWER TIER COVERED TRANSACTIONS

1. By signing this Contract, the prospective lower tier participant certifies, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
2. Where the prospective lower tier participant is unable to certify to any of the statement in this certification, such prospective participant shall provide an explanation.
3. The prospective lower tier participant shall pass the requirements of A.1. and A.2., above, to each person or entity with whom the participant enters into a covered transaction at the next lower tier.

B. CERTIFICATION REGARDING LOBBYING - Certification for Contracts, Grants, Loans, and Cooperative Agreements

By signing this Contract, the Contractor hereby certifies, to the best of his or her knowledge and belief, that :

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the Contractor, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment or modification of any Federal contract, grant, loan or cooperative agreement.
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan or cooperative agreement, the Contractor shall complete and submit Standard Form - LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
3. The Contractor shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of facts upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S.C. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

C. DRUG FREE WORKPLACE

By signing this Contract, the Contractor certifies that it will provide a Drug Free Workplace by implementing the provisions at 29 CFR 94, pertaining to the Drug Free Workplace. In accordance with these provisions, a list of places where performance of work is done in connection with this specific grant will take place must be maintained at the Contractor's office and available for Federal inspection.

D. NONDISCRIMINATION & EQUAL OPPORTUNITY ASSURANCE

As a condition to the award of financial assistance from the Department of Labor under Title I of the Workforce Innovation and Opportunity Act (WIOA), the Contractor assures that it will comply fully with the nondiscrimination and equal opportunity provisions of the following laws:

(1) Section 188 of the WIOA, which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex, national origin, age disability, political affiliation, or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States or participation in a program or activity that receives financial assistance under Title I of WIOA;

(2) Title VI of the Civil Rights Act of 1964, as amended which prohibits discrimination on the basis of race, color, and national origin;

(3) Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;

(4) The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and

(5) Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs.

The Contractor also assures that it will comply with 29 CFR Part 38 and all other regulations implementing the laws listed above. This assurance applies to the Contractor's operation of the WIOA Title I – financially assisted program or activity, and to all agreements the Contractor makes to carry out the WIOA Title I – financially assisted program or activity. The Contractor understands that the United States has the right to seek judicial enforcement of this assurance.

E. BUY AMERICAN NOTICE REQUIREMENT

In accordance with Section 502 of the WIOA, none of the funds made available under the WIOA may be expended by an entity unless the entity agrees that in expending the funds it will comply with sections 8301 through 8303 of title 41, United States Code (commonly known as the "Buy American Act").

F. SALARY AND BONUS LIMITATIONS

No federal funds appropriated annually under the heading 'Employment and Training' shall be used by a subrecipient of such funds to pay the salary and bonuses of an individual, either as direct costs or indirect costs, at a rate in excess of Executive Level II. This limitation shall not apply to vendors providing goods and services as defined in 2 CFR 200.330. See Training and Employment Guidance Letter number 5-06 for further clarification. Where applicable, the Contractor agrees to comply with the Salary and Bonus Limitations.

G. VETERANS' PRIORITY PROVISIONS

Federal grants for qualified job training programs funded, in whole or in part, by the U.S. Department of Labor are subject to the provisions of the "Jobs for Veterans Act" (JVA), Public Law 107-288 (38 USC 4215). The JVA provides priority of service to veterans and spouses of certain veterans for the receipt of employment, training, and placement services. Please note that to obtain priority service, a person must meet the program's eligibility requirements. Training and Employment Guidance Letter (TEGL) No. 5-03 (September 16, 2003) and Section 20 of the Code of Federal Regulations (CFR) Part 1010 (effective January 19, 2009) provide general guidance on the scope of the veterans priority statute and its effect on current employment and training programs. Where applicable, the Contractor agrees to comply with the Veteran's Priority Provisions.

STATE CERTIFICATIONS**H. CERTIFICATION REGARDING DEBARMENT, SUSPENSION, INELIGIBILITY, AND OUTSTANDING DEBTS**

By signing this Contract, the Contractor, as a duly sworn representative of the contractor/vendor, hereby attests and certifies that:

- a) No principal or executive officer of the Contractor's company, its subcontractor(s) and/or successor(s) is presently suspended or debarred; and
- b) The Contractor, its subcontractor(s) and/or its successor(s) is not ineligible to submit a bid on, or be awarded, any public work contract or sub-contract with the State, any municipal corporation or public body for reason of debarment for failure to pay the prevailing rate of wages, or to provide supplements, in accordance with Article 8 of the New York State Labor Law.
- c) The Contractor, its subcontractor(s) and/or its successor do not have any outstanding debts owed to the Department, including but not limited to, contractual obligations, fines related to Safety and Health violations, payments owed to workers for public works projects or the general provisions of the labor Law, unemployment insurance contributions or other related assessments, penalties or charges.

I. CERTIFICATION REGARDING "NONDISCRIMINATION IN EMPLOYMENT IN NORTHERN IRELAND: MacBRIDE FAIR EMPLOYMENT PRINCIPLES"

By signing this Contract, the Contractor stipulates that in accordance with the MacBride Fair Employment Principles (Chapter 807 of the laws of 1992), the Contractor, or any individual or legal entity in which the contractor holds a 10% or greater ownership interest, or any individual or legal entity that holds a 10% or greater ownership interest in the contractor, either (a) has no business operations in Northern Ireland, or (b) shall take lawful steps in good faith to conduct any business operations in Northern Ireland in accordance with the MacBride Fair Employment Principles (as described in Section 165 of the New York State Finance Law), and shall permit independent monitoring of compliance with such principles.

J. NON-COLLUSIVE BIDDING CERTIFICATION

By submission of this bid, each bidder and each person signing on behalf of any bidder certifies, and in the case of a joint bid each party thereto certifies as to its own organization, under penalty of perjury, that to the best of his or her knowledge and belief:

(1) The prices in this bid have been arrived at independently without collusion, consultation, communication, or agreement, for the purpose of restricting competition, as to any matter relating to such prices with any other bidder or with any competitor;

(2) Unless otherwise required by law, the prices which have been quoted in this bid have not been knowingly disclosed by the bidder and will not knowingly be disclosed by the bidder prior to opening, directly or indirectly, to any other bidder or to any competitor; and

(3) No attempt has been made or will be made by the bidder to induce any other person, partnership or corporation to submit or not to submit to bid for the purpose of restricting competition.

K. IRAN DIVESTMENT ACT

By signing this Contract, the Contractor certifies in accordance with State Finance Law §165-a that it is not on the "Entities Determined to be Non-Responsive Bidder/Offerers pursuant to the New York State Iran Divestment Act of 2012" ("Prohibited Entities List") posted at: <http://www.ogs.ny.gov/about/regs/docs/ListofEntities.pdf>.

The Contractor further certifies that it will not utilize on this contract any subcontractor that is identified on the Prohibited Entities List. The Contractor agrees that should it seek to renew or extend this Contract, it must provide the same certification at the time the Contract is renewed or extended.

During the term of the Contract, should the state agency receive information that a person (as defined in State Finance Law §165-a) is in violation of the above-referenced certification, the state agency will review such information and offer the person an opportunity to respond. If the person fails to demonstrate that it has ceased its engagement in the investment activity which is in violation of the Act within 90 days after the determination of such violation, then the state agency shall take such action as may be appropriate and provided for by law, rule, or contract, including, but not limited to, imposing sanctions, seeking compliance, recovering damages, or declaring the Contractor in default.

The state agency reserves the right to reject any request for renewal, extension, or assignment for an entity that appears on the Prohibited Entities List prior to the renewal, extension, or assignment of the Agreement, and to pursue a responsibility review with the Contractor should it appear on the Prohibited Entities List hereafter..

I, the undersigned, attest under penalty of perjury that I am an authorized representative of the Bidder/Contractor and that the foregoing statements are true and accurate.

Signature of Authorized Representative:	DocuSigned by: <i>Christopher Nardone</i> D4ABCD8B3C7046E...
Title: Director, Columbia Greene Workforce NY	
Date: 9/28/21	9/28/2021

Policy #: 602

Title: WIOA Youth Eligibility

Effective Date: 7/01/15

Amended Date: 11/23/15

7/16/19

9/21/21

Policy Description: Only people between the ages of 14 and 24, who meet certain guidelines, are eligible to receive WIOA Title I Youth services.

Reference Documents: WIOA Regulations; TEGL # 23-14; TEGL # 8-15; TEGL 21-16

Procedures: All youth customers seeking WIOA funded services must be determined eligible. Pre-eligibility is established at time of initial contact via phone call, office visit or email. A checklist of needed documents necessary to prove eligibility is given to youth and/or their guardians to assist them in the process of eligibility determination. The check list includes an "other" section that is specific to each youth's circumstances. This section is utilized to obtain necessary documentation to determine a barrier.

There are different eligibility requirements based on a youth's school status.

Out-of-School:

Under WIOA section 129(a)(1)(B), an out-of-school youth (OSY) is an individual who is:

- Not attending any school (as defined under State law);
- Not younger than 16 or older than age 24 at time of enrollment. Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 24 once they are enrolled in the program; and
- One or more of the following:
 - A school dropout;
 - A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters;
 - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
 - An individual who is subject to the juvenile or adult justice system;
 - A homeless individual, a runaway, an individual who is in foster care or has aged out of the foster care system, a child eligible for assistance under Section 477 of the Social Security Act, or an individual who is in an out-of-home placement;

- An individual who is pregnant or parenting;
- An individual with a disability;
- A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

Note 1 – The local barrier of “needs additional assistance to complete an educational program or secure and retain employment” is defined locally as requiring a signed letter from an agency or school professional stating that the youth require additional assistance to complete an educational program, or to secure and hold employment. The letter must also state that the professional has personal knowledge of the youth’s current situation and/or capabilities. A self-attestation is also acceptable if a youth is a victim of abuse, suffering from substance abuse or medical issues, an expectant father and or the child of an incarcerated parent. Due to the nature of these barriers youth may not have disclosed to agency or school professionals.

Individuals age 18 and older may also receive services through the Workforce Investment Office’s adult and dislocated worker programs.

In School Youth

Under WIOA section 129(a)(1)(C), an in-school youth (ISY) is an individual who is:

- Attending school (as defined by State law), including secondary and postsecondary school;
- Not younger than age 14 or (unless an individual with a disability who is attending school under State law) older than age 21 at time of enrollment. Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 21 once they are enrolled in the program;
- A low-income individual (70% of the Lower Living Income Standard Level); and
- One or more of the following:
 - Basic skills deficient;
 - An English language learner;
 - An offender;
 - A homeless individual, a homeless child or youth, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under sec. 477 of the Social Security Act, or in an out-of-home placement;
 - An individual who is pregnant or parenting;
 - An individual with a disability;
 - An individual who requires additional assistance to complete an educational program or to secure or hold employment (AKA the local barrier).

Note 1 – The local barrier of “needs additional assistance to complete an educational program or secure and retain employment” is defined locally as requiring a signed letter from an agency or school professional stating that the youth requires additional assistance to complete an educational

program, or to secure and hold employment. The letter must also state that the professional has personal knowledge of the youth's current situation and/or capabilities. A self-attestation is also acceptable if a youth is a victim of abuse, suffering from substance abuse or medical issues, an expectant father and or the child of an incarcerated parent. Due to the nature of these barriers youth may not have disclosed to agency or school professionals.

Note 2 - Not more than 5 percent of the ISY assisted may be eligible based on the local barrier of an ISY who requires additional assistance to complete an educational program or to secure or hold employment.

The letter should then be mailed to the business with a self-addressed, stamped, return envelope enclosed.

Upon receipt of the returned employer verification letter, the information should be entered into OSOS Employment Outcomes tab and in comments.

Policy #: 603 **Title: WIOA Youth Performance Measures Definitions**

Effective Date: 7/1/16

Amended Date: 11/29/17

7/16/19

9/21/21

Policy Description: To determine the quality and success of WIOA youth programming, performance measures have been established.

Reference Documents: TA 18-6.2; TEGL 9-17; TEGL 10-16

Procedures: Listed below are the performance measures impacting WIOA Youth: Tracking and attainment of measures will be monitored regularly by WIO Youth Program staff via a spreadsheet and by the use of management reports. The WIO Director will also monitor youth performance measures at least quarterly via management reports.

WIOA Youth Performance Measures (implemented until PY 18)

- Employment Rate 2nd Quarter after Exit
- Employment Rate 4th Quarter after Exit
- Median Earnings during the 2nd Quarter after Exit
- Credential Attainment 4th quarter after Exit, (plus employment or postsecondary enrollment)
- Measurable Skills Gain (improvement of Reading and Math Skills during each program year of participation, no matter the date of program entry.)

Five Types of Measurable Skills Gains

1. Achievement of at least one educational functioning level, if receiving instruction below postsecondary education level. (See below.)
2. Attainment of secondary school diploma or equivalent
3. Secondary or postsecondary transcript for sufficient number of credit hours
 - ◆ **Secondary:** transcript or report card for 1 semester
 - ◆ **Postsecondary:** at least 12 hours per semester or, for part-time students, a total of at least 12 hours over 2 completed consecutive semesters
4. Satisfactory progress report toward established milestone from an employer or training provider

5. Passage of an exam required for an occupation or progress attaining technical/occupational skills as evidenced by trade-related benchmarks

Three Ways to Measure Educational Functioning Level Gain

- ❖ Programs may measure MSG gain type #1, educational functioning level gain by:
 1. Comparing initial educational functioning level, as measured by a pre-test, with the participant's educational functioning level, as measured by a post-test;
 2. Enrolling in postsecondary education and training during the program year if the participant exits a program below the postsecondary level.

- All NYS WIOA programs utilize the TABE test as both a pre-test to determine if a youth is basic skill deficient and as a post-test to determine if a youth has improved either their reading or math by one functional level. Post-test must be administered within one year of a participant's enrollment. The chart below defines educational functional levels:

WIA Measure	Educational Functioning Level	TABE (11-12): Scale Scores	
Basic Skill Deficient	Beginning ABE Literacy	Grade level:	0.0 - 1.9
Basic Skill Deficient	Beginning Basic Education	Grade level:	2.0 - 3.9
Basic Skill Deficient	Low Intermediate Basic Education	Grade level:	4.0 - 5.9
Basic Skill Deficient	High Intermediate Basic Education	Grade level:	6.0 - 8.9
Basic Skill Proficient	Low Adult Secondary Education	Grade level:	9.0 - 10.9
Basic Skill Proficient	High Adult Secondary Education	Grade level:	11.0 – 12.9

Columbia-Greene Workforce NY will use TABE assessment as its primary assessment tool to measure educational functioning level. Other valid and reliable assessments may be used as appropriate to measure educational functioning level and basic skills deficiency at the recommendation of Career Center staff with approval of the Center Director.

Assessment options may include the following:

- Wide Range Achievement Test (WRAT)
- STAR Test
- Kaufman Test of Educational Achievement
- Armed Services Vocational Aptitude Battery (ASVAB)
- Recent school report card or Individualized Education Plan (IEP) showing the youth is performing below 8th grade level or is unable to compute/solve problems or read, write, or speak English at a level necessary to function on the job, in the individuals family, or in society
- Other valid, reliable assessments at the discretion of the Career Center Director

No assessment that was taken more than six months prior to enrollment will be used to measure education functioning level gains or basic skills deficiency.