



December 7, 2016

Dear Directors Mullinax, Helton, Stone, Wilson, and LeBeau,

The Local/Regional plan for Region 3 has been conditionally approved by the Georgia Department of Economic Development's Workforce Division (WFD). The final approval of the plan is contingent upon completion of the revisions/additions requested in this letter.

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

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

Sincerely,

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

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

cc: LWDB Chairs  
cc: CLEOs

<b>Plan Topic</b>		<b>Edits Requested</b>
<b>1</b>	<b>Identification of Fiscal Agent</b>	
	Does the plan provide an identification of the entity responsible for the disbursement of grant funds as determined by the chief elected official?	
<b>2</b>	<b>Description of Strategic Planning Elements</b>	
<b>a</b>	Does the plan provide an analysis of the regional economic conditions including existing and emerging in-demand industry sectors and occupations and the employment needs of employers in those industry sectors? Does the plan include the listing of occupations in demand within the region and describe how the list was developed, citing source data?	
<b>b</b>	Does the plan provide an analysis of the knowledge and skills needed to meet the employment needs of the employers in the region, including employment needs in in-demand industry sectors and occupations?	
<b>c</b>	Does the plan provide an analysis of the workforce in the region, including current labor force employment, unemployment data, information on labor market trends and the educational and skills levels of the workforce in the region, including individuals with barriers to employment? Does the plan list all data sources used to gather this information?	
<b>d</b>	Does the plan provide an analysis of the workforce development activities (including education and training) in the region, including an analysis of the strengths, weaknesses and capacity of such services to address the identified education and skill needs of the workforce, and the employment needs of employers in the region?	

<b>e</b>	Does the plan provide a description of the local board's strategic vision and goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment), including goals relating to the performance accountability measures based on primary indicators of performance in order to support regional economic growth and economic self-sufficiency?	
<b>f</b>	Does the plan provide a strategy to coordinate core programs to align resources available to the local area to achieve the strategic visions and goals?	
<b>3</b>	<b>Description of Strategies and Services</b>	
<b>a</b>	Does the plan describe how the area will engage employers in workforce development programs, including small employers and employers in in-demand industry sectors and occupations?	The plan should better describe how the region will coordinate services among the LWDA's.
<b>b</b>	Does the plan describe how the area will support a local workforce development system that meets the needs of businesses in the local area? Does it discuss the area's workforce services to businesses and how business and organized labor representatives on the LWDB contributed to the development of these strategies? Does the plan provide a listing on business services available through the areas such as employer workshops and assessment and screening of potential employees?	The plan should better describe how the region will coordinate services among the LWDA's.
<b>c</b>	Does the plan describe how the area will better coordinate workforce development programs and economic development, as well as identify economic development partners and describe their involvement of the economic development community in developing strategies?	The plan should better describe how the region will coordinate services among the LWDA's.
<b>d</b>	Does the plan discuss how the area will strengthen linkages between the one-stop delivery system and unemployment insurance programs?	
<b>4</b>	<b>Regional Service Delivery</b> (Only applies to regions that encompass two or more local areas.)	
<b>a</b>	Does the plan describe the plans for the establishment of regional service delivery strategies, including the use of cooperative service delivery agreements?	

<b>b</b>	Does the plan describe the plan for coordinating the administrative cost arrangements, including the pooling of funds for administrative costs?	
<b>5</b>	<b>Sector Strategy Development</b>	
<b>a</b>	Does the plan describe the partners that are participating in sector strategy development?	
<b>b</b>	Does the plan describe the meetings that have taken place and the strategy by which partners will continue to be engaged?	
<b>c</b>	Does the plan describe the research and the data that was used to identify the sector that was chosen for the sector strategies training?	
<b>d</b>	Does the plan provide a completed outline of the sector strategy for the previously identified sector that includes the following details: participating employers, target occupations, training programs, and target populations?	
<b>e</b>	Does the plan describe the plans for future strategy development for future sectors and, if applicable, discuss the next sectors to be targeted?	
<b>6</b>	<b>Description of the One-Stop Delivery System</b>	
<b>a</b>	Does the plan provide a description of how the local board will ensure the continuous improvement of eligible providers of services through the system and ensure that such providers meet the employment needs of local employers, workers and jobseekers?	
<b>b</b>	Does the plan describe how the local board will facilitate access to services provided through the one-stop delivery system, including in remote areas, through the use of technology and through other means?	

<b>c</b>	Does the plan provide a description of how entities within the one-stop delivery system, including one-stop operators and the one-stop partners, will comply with WIOA § 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 regarding the physical and programmatic accessibility of facilities, programs and services, technology and materials for individuals with disabilities? Does it include the provision of staff training and support and address the needs of individuals with disabilities?	
<b>d</b>	Does the plan provide a comprehensive description of the roles and resource contributions of the one-stop partners?	AWDA- how are partner services provided? (What happens with the Partner Referral Form?)
<b>e</b>	Does the plan identify the current One-Stop Operator in the local area(s) and describe how the region/local area is preparing for the competitive process for operator selection? Does it describe how market research, requests for information and conducting a cost-and-price analysis are being conducted as part of preparation?	
<b>7 Awarding Sub-grants and Contracts</b>		
	Does the plan provide a description of the competitive process to be used to award the sub-grants and contracts in the local area for activities carried out under Title I?	<p>1. Include additional description of competitive contracting procedures by detailing the entities involved in the process and broadly outlining the procurement and awarding process in 2 to 3 paragraphs. Also, ensure the process complies with federal procurement requirements set forth in 2 CFR § 200.</p> <p>2. Describe the role the LWDB plays in the sub-grant and competitive procurement processes. If the LWDB uses a specific committee, detail its composition and general responsibilities.</p>
<b>8 EEO and Grievance Procedures</b>		
	Does the plan describe local procedures and staffing to address grievances and complaint resolution?	See Attachment A for details
<b>9 Local Boards</b>		

<b>a</b>	Does the plan provide a description of how local board members are identified and appointed? Does it include a description of how the nomination process occurs for adult education and labor representatives?	Atlanta - Does not describe how Adult Ed, labor, or business is nominated to serve. Atlanta Regional - Does not describe how Adult Ed or labor is nominated to serve. Cobb - Does not describe how Adult Ed or labor is nominated to serve. DeKalb - Does not describe how Adult Ed, Labor, or business is nominated to serve.
<b>b</b>	Does the plan describe the area's new member orientation process for board members?	
<b>c</b>	Does the plan describe how the local board will coordinate workforce development activities carried out in the local area with regional economic development activities carried out in the region (in which the local area is located or planning region)?	
<b>d</b>	Does the plan describe how local board members are kept engaged and informed?	
<b>10 Local Board Committees</b>		
	Does the plan provide a description of board committees and their functions?	Atlanta - Does not provide a description of the committee membership. Cobb - Alludes to a chart with committee descriptions, but the chart was not found. DeKalb - The committees do not describe the membership. Fulton - The committees do not describe the membership.
<b>11 Plan Development</b>		
	Does the plan provide a description of the process by which the plan was developed, including the participation of core partners, providers, board members and other community entities? Does it also describe the process used by the local board to provide a 30-day comment period prior to submission of the plan including an opportunity for public comment, including comment by representatives of business and comment by representatives of labor organizations, representatives of education, and input into the development of the local plan?	
<b>12 Expanding Service to Eligible Individuals</b>		

	Does the plan provide a description of how the local board, working with the entities carrying out core programs, will expand access to employment, training, education and supportive services for eligible individuals, particularly eligible individuals with barriers to employment? Does it include how the local board will facilitate the development of career pathways and co-enrollment, as appropriate, in core programs, and how it will improve access to activities leading to a recognized postsecondary credential, academic or industry-recognized?	There is no discussion of a regional strategy.
<b>13</b>	<b>Description of Service to Adults and Dislocated Workers</b>	
	Does the plan provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area?	Fulton - Provide additional detail
<b>14</b>	<b>Description of Rapid Response Services</b>	
	Does the plan provide a description of how the local board will coordinate workforce development activities carried out in the local area with statewide rapid response activities?	AWDA/Cobb - Neither LWDA describes activities for layoff events
<b>15</b>	<b>Description of Youth Services</b>	
	Does the plan provide a description and assessment of the type and availability of youth workforce development activities in the local area, including activities for youth with disabilities? Does this description and assessment include an identification of successful models of such youth workforce development activities?	Cobb/Fulton - Neither LWDA provides a description for how the 14 youth elements will be administered.
<b>16</b>	<b>Implementation of Work-Based Learning Initiatives</b>	

	Does the plan provide a description of how the area will implement initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries and other business services and strategies designed to meet the needs of employers in the corresponding region in support of the business service strategy?	Fulton - Please provide more information on how WBL opportunities are explored.
<b>17</b>	<b>Provision of ITAs</b>	
	Does the plan provide a description of how training services detailed in WIOA § 134 will be provided through the use of ITAs? If the training services will be used, does it describe how the use of such contracts will be coordinated with the use of ITAs and how the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided?	
<b>18</b>	<b>Entrepreneurial Skills Training and Microenterprise Services</b>	
	Does the plan provide a description of how the area will coordinate and promote entrepreneurial skills training and microenterprise services?	Atlanta Regional - Fails to provide sufficient detail.
<b>19</b>	<b>Coordination with Education Programs</b>	
	Does the plan provide a description of how the local board will coordinate education and workforce development activities carried out in the local area with relevant secondary and postsecondary education programs and activities to coordinate strategies, enhance services and avoid duplication of services?	Does not adequately discuss a regional approach. DeKalb/Fulton/Atlanta Regional –Lacks sufficient.
<b>20</b>	<b>Description of Supportive Services</b>	
	Does the plan provide a description of how the local board will coordinate workforce development activities carried out under this title in the local area with the provision of transportation, including public transportation, and other appropriate supportive services in the local area? Does it describe the coordination of transportation and other supportive services regionally, if applicable? Does it include the region/local area Supportive Service Policies?	



<b>21</b>	<b>Description of the Workforce System</b>	
	Does the plan provide a description of the workforce development system in the local area that identifies all relevant programs and how the local board will work with the entities to carry out both core and other workforce development programs to deliver well aligned services in support of the strategies identified in the state plan? Does this include programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 USC 2301 et seq.)?	Cobb/Atlanta Regional - Did not mention Carl Perkins.
<b>22</b>	<b>Coordination with Wagner-Peyser</b>	
	Does the plan provide a description of plans and strategies for, and assurances concerning, maximizing coordination of services provided by the state employment service under the Wagner-Peyser Act (29 US 49 et seq.) and services provided in the local area through the one-stop delivery system, to improve service delivery and avoid duplication of services?	
<b>23</b>	<b>Coordination with Adult Education</b>	
	Does the plan provide a description of how the local board will coordinate workforce development activities carried out in the local area with the provision of adult education and literacy activities under title II in the local area, including a description of how the local board will carry out, consistent with subparagraphs (A) and (B)(i) of section 107(d)(11) and section 232 of the WIOA Law, the review of local applications submitted under title II?	Fulton – Failed to provide sufficient detail.
<b>24</b>	<b>Coordination with Vocational Rehabilitation</b>	
	Does the plan provide a description of the cooperative agreement between the local Georgia Vocational Rehabilitation office and the local board which describes efforts made to enhance the provision of services to individuals with disabilities and to other individuals, cross-train staff, provide technical assistance, share information, cooperate in communicating with employers and other efforts at cooperation, collaboration and coordination?	
<b>25</b>	<b>Description of Performance Measures</b>	

	Does the plan provide a description of the local levels of performance negotiated with the Governor and chief elected official pursuant to WIOA § 116 (c), to be used to measure the performance of the local area and to be used by the local board for measuring the performance of the local fiscal agent (where appropriate), eligible providers under subtitle B and the one-stop delivery system, in the local area?	
<b>26</b>	<b>One-Stop System Performance and Assessment</b>	
	Does the plan provide a listing of locally/regionally developed one-stop performance standards and describe the criteria used to develop performance?	Please include description of the development of one-stop performance assessment and standards.
<b>27</b>	<b>ETPL System</b>	
<b>a</b>	Does the plan provide a description of the public notification to prospective providers?	
<b>b</b>	Does the plan provide a description of how the board(s) evaluates providers and proposed training programs for initial eligibility, based on (at a minimum) criteria of proven effectiveness, local employer/industry demand, accreditation and customer accessibility?	
<b>c</b>	Does the plan provide a description of the formal appeals process for aggrieved ITA customers and providers of unapproved training programs?	
<b>d</b>	Does the plan provide a description of the ongoing process used to update the data on the eligible providers list (exclusive of the state-conducted continued eligibility process)?	
<b>e</b>	Does the plan provide a description of any regional policies or agreements for ITAs or training providers?	
<b>f</b>	Does the plan provide a description of the process to track and manage all ITA activity?	
<b>g</b>	Does the plan provide a description of local board policy on use of statewide eligible training provider list (including financial and duration limits, out-of-area training, service to out-of-area customers, etc.)?	
<b>h</b>	Does the plan provide a description of how registered apprenticeship programs are added to the ETPL?	

<b>28</b>	<b>Implementation of Technology</b>	
	Does the plan provide a description of the technology used to enhance customer (participant and business) experience and any additional data analytics used to enhance planning and measure outcomes beyond mandated performance measures?	
<b>29</b>	<b>State Branding</b>	
	Does the plan provide a description for how the area will adopt and utilize the state brand?	Atlanta Regional – Fails to provide a description for how they will adopt the state brand.
<b>30</b>	<b>State Initiatives</b>	
	Does the plan describe how the area will coordinate with WFD state initiatives, including: Go Build Georgia, Operation: Workforce, WorkSmart Georgia, and the High Demand Career Initiative?	
<b>31</b>	<b>Special Population</b>	
	Does the plan describe how the area will provide services to the special populations specified in the state plan, to include ex-offenders, veterans, at-risk youth, long-term unemployed, adult learners, and individuals with disabilities? Does the region's plan list any additional target groups?	DeKalb – Fails to provide an adequate description of special populations.
<b>32</b>	<b>Priority of Service</b>	
	Does the plan describe how the region will identify and administer the state's priority of service policy? Does the region identify if they will add target populations in addition to one's specified by state and federal policy?	
<b>33</b>	<b>Attachment 1</b>	
	Did the LWDA include a Local Workforce Development Board Member Listing?	
<b>34</b>	<b>Attachment 2</b>	
	Did the LWDA include PY16 and PY17 local negotiated performance goals?	
<b>35</b>	<b>Attachment 3</b>	
	Did the LWDA include any comments that express disagreement? (Not required)	
<b>26</b>	<b>Attachment 4</b>	
	Did the LWDA properly fill out and submit a signature page?	



## ATTACHMENT A

### Section A 8 EO and Grievance Procedures

Does the plan describe local procedures and staffing to address grievances and complaint resolution?

#### **Areas for Improvement:**

1. *AWDA* - Grievance Policy needs to include a header to separate the contractor complaint process from the participant/employee/interested party complaint process.
2. *AWDA*- The following sentence is incorrect, "The request for review shall be filed within ten (10) days of receipt of the adverse decision or ten (10) days from the date on which the complainant(s) shall have received a decision." WFD's policy states that any appeal to WFD must be filed within 60 days of the LWDA's issuance of its decision.
3. *AWDA*- The following sentence is incorrect, "The Georgia Department of Economic Development, Workforce Division will conduct a review of the complaint and issue a decision within thirty (30) days from the date of receipt of the review request." WFD has 60 days to issue its own resolution.
4. *COBB* - General Complaint process does not adhere to WFD policy. Specifically, it seems that general complaints are handled in a three-tiered local process which does not mention the appeal to WFD. Please correct.
5. *COBB*- For the Discrimination Complaint process, either provide additional detail or reference a more detailed policy/process which is utilized. The narrative provided gets into what information needs to be submitted and the review deadlines but does not list all the important information. Please either add additional information to fully describe the process or be more general and reference a more thorough policy document.
6. *DeKalb*- Please state that your EO and General Complaint processes both comply with federal and State regulations and policies.
7. *DeKalb*- For the Discrimination Complaint process, either provide additional detail or reference a more detailed policy/process.
8. *Fulton* - For the Discrimination Complaint process, either provide additional detail or reference a more detailed policy/process.