Local Plan

1) A regional (local) analysis of:
(i) Economic conditions including existing and emerging in-demand industry sectors and occupations; and
(ii) Employment needs of businesses in existing and emerging in-demand industry sectors and occupations.
(iii) As appropriate, your local area may use an existing analysis, which is a timely current description of the regional economy, to meet the requirements of paragraphs (a)(1)(i) and (ii) of this section;

(1) A regional analysis of the Greater Brockton region, including the economic conditions and employment needs are contained within the Southeastern MA Regional Blueprint which is enclosed with this plan. This regional blueprint approaches labor market information and analysis from a broader perspective and includes four Workforce Boards; Bristol, Greater Brockton, Greater New Bedford and South Shore.

As we recognize the shared priorities and commonalities of our regions, we also identify with industries that are significant on a local level and include them in economic and workforce development activities.

Although not identified in the top three priority industries in the MassHire GBWB region, advanced manufacturing represents 7% of the total workforce in the southeast and pays nearly 10% of the region's total wages. It's easily accessible on-ramps to entry level positions and strong intersection with the local workforce development system warrants its definition as a critical industry cluster in the southeast. This effort is aided by a strong commitment by local manufacturers to invest in their workforce, promote their industry and dedicate time and resources to the sector. Through industry collaborations and partnering with employer groups like the Southeastern MA Advanced Manufacturing Collaborative, the MassHire GBWB continues to collaborate with southeastern MA workforce boards and manufacturers sharing information as well as developing training programs to address the needs of local companies through pipeline training and upskilling of many individuals in the local incumbent manufacturing workforce. Basic math skills, Shop Math, Blueprint Reading, Safety, Work-readiness, Lean, CNC Mill & Lathe Concepts, Problem Solving and Welding were identified by employers as skills necessary to enter and succeed in the sector and have been incorporated into training programs. Training in Three-D Printing and Robotics are also areas the MassHire GBWB and the southeastern MA Workforce Boards are focusing on for the next five years.

The construction industry offers a highly accessible career path for individuals without a college degree with opportunities for career advancement through the expansion of apprenticeships. The region offers strong educational capacity for this industry through workforce development partnerships with the region’s vocational technical high schools. For example, MassHire GBWB partners with Southeastern Regional School District and South Shore Vocational Technical High School to create Welding Training Programs to prepare individuals for careers in multiple industries.
including construction and manufacturing. Construction also aligns with regional economic development priorities. For example, major transportation projects have resulted in increased hiring activity in the southeast. There are a large number of potential candidates for employment in this industry through the region’s Career Centers. The industry also features a strong average weekly wage ($1,315) in comparison to the regional average ($961).

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

The skills sets and education levels of the region’s population continue to be a primary consideration in workforce development, education and economic development strategies to meet the workforce needs of area employers. MassHire Greater Brockton Workforce Board (MassHire GBWB) uses various data sources and sector-based conversations with employers and industry experts to best understand the current and future employment needs of businesses in the region and across southeastern MA. Critical to all in-demand industry sectors MassHire GBWB is focusing on over the next few years, in addition to education levels and specific skills needed for entry and success in specific jobs, it is very important to note that a significant portion of residents require language or basic skill remediation to then access specialized occupational training or post-secondary education. Strategies in addressing this issue are discussed later in the local plan.

The MassHire GBWB area and larger Southeastern MA region are home to a diversity of industry sectors, providing numerous employment opportunities and career pathways for individuals of all ages and abilities. Utilizing data analysis in conjunction with state and regional criteria clearly identifies that health care, professional scientific & technical, and finance & insurance services are priority industries in Greater Brockton and within southeastern MA. In addition to these priority industry sectors, it is important to note that manufacturing, construction and emerging industries in southeastern MA, such as those associated with the Blue Economy, are also considered Critical Industries with a variety of in-demand occupations, many of which require a high school credential with advancement through post-secondary short-term training and/or Associates degrees. Most of southeastern MA-based employment (62%) currently requires a high school diploma however, as noted in the final version of the 2018 Southeastern MA Labor Market Blueprint, of the 165 occupations that achieved a four or five STAR ranking in the Southeast region (meaning jobs in high demand with high wage occupations), 113 or 72% required at least an Associate Degree. The strongest growth occupations with high wages and career ladder opportunities are increasingly those with higher skill set requirements.

Healthcare represents the largest industry cluster within the region with nearly 19% of workers employed in the industry and nearly 18,000 new jobs added to health care occupations over the past seven years including occupations at the both the entry and advanced levels. Multiple occupations within this industry are among the fastest growing jobs in the southeast. For example, Registered Nurse represents the top occupation by indexed employer demand and is projected to grow steadily by double digit percentages in the Greater Brockton area and all areas across southeastern MA. As well, Nursing Assistants, Home Health Aides, Physical Therapists, Occupational Therapists, Personal Care Aides, and Phlebotomists are only a partial list of Healthcare occupations that are projected to show long term growth of greater than 10%, in some cases approaching 35% in parts of the southeast region. (Department of Unemployment Assistance –Long Term Occupational
Projections 2014-2024). It is important to recognize that some form of post-secondary education will be essential for those seeking a rewarding career with good pay and upward mobility. Clearly the skills, requirements and pay for employment in healthcare vary from, for example, the 75 hour required training in MA for Home Health Aides, to completing a state-approved 100 hour training program & passing a state certification exam in order to be placed on the Massachusetts Nurse Aide Registry and on to completing and graduating from a four-year Registered Nurse program at a college/university, etc.

In terms of career development, the industry is marked by strong career pathway opportunities with accessible entry points. Strong employer engagement within this industry is evident with sector partnerships in place within the region with workforce development and education participation already in place. An on-site state-approved Healthcare Lab and a CNA/HHA Training Program at MassHire GBWB provides an entry point for many individuals, including those who are unemployed and English language learners from local adult basic education programs, to be trained, attain an industry-recognized credential and enter employment to pursue a career pathway in the healthcare sector. From 2018-2019, MassHire GBWB anticipates training sixty unemployed individuals including, but not limited to, older youth from MassHire GBWB YouthWorks and adults from the Brockton Adult Learning Center as Home Health Aides and Nursing Assistants to help local employers fill their open vacancies. Based on changing needs and continuous feedback from local healthcare employers, MassHire GBWB also added Alzheimer’s/Dementia Care training to the original program to increase skill sets and even better prepare individuals for employment opportunities.

We continue to identify the needs of healthcare employers as we simultaneously communicate and build career pathways by working closely with our career centers, vocational schools, community colleges, four-year public institutions and private trainers in identifying educational opportunities to meet the needs of employers and help build the skills sets of individuals to enter and succeed in the healthcare sector. MassHire GBWB coordinated an Industry Sector Conversations: Discussions on The Workforce In Healthcare event with Bridgewater State University to bring together healthcare employers and educators to share info and discuss local needs and challenges in the industry. In addition, a report documenting opportunities for training through the development of healthcare curriculum & credentials is being developed and will be shared with stakeholders across the region.

**Financial Services** is an important industry in the southeast region, and a focus of the MassHire GBWB, having impact on all other sectors through capital and finance provision. According to a study by Mass Insight, banks and other financial institutions account for $36 billion, or 9 percent of the state’s total economic output. The Financial Services Industry represents almost 7% of the southeast region’s total wage output and shows a steady growth rate at 4.5% and represents the highest average wage increase in any industry from 2013-2016(12.45%) resulting in an income level 33% above the regional average.

A challenge to the industry is that there is a need for significant cross training across positions and there is a lack of training and education programs in the region that are specific to entry level positions in financial services. One occupation worthy of mention that fell within the financial services cluster analysis was Customer Service Representatives. This represents a four-star occupation that provides an entry level access point to career ladders within not only the financial services industry but also among nearly every industry sector in the southeast. Nearly all employer feedback we have received includes a need to identify individuals with strong customer service skills.
Customer Service Representatives and Tellers are common entry points into the Financial Service Industry with opportunities to secure positions with wages significantly higher than regional median wage. In fact, multiple Presidents of area financial institutions began their career in the industry as a Teller. This type of feedback from local banks through the Finance & Banking CEO Roundtable, in addition to on-going discussions with human resource banking and finance partners, have all aided the GBWB in creating and obtaining funding for a new Banking and Finance Training Program. This training directly addresses additional workforce challenges articulated by local employers including a need for a more diverse and multilingual workforce, the need to attract younger workers and the desire to “home grow” employees through such mechanisms as internships. Employers revealed customer service, problem solving, work readiness skills, interpersonal skills, teamwork, financial literacy and writing skills as core competencies to succeed in the industry and are built into the curriculum and work-based learning though financial services internships. The Banking and Finance Training Program has been designed to provide an introduction and an overview of the financial services industry. Twenty youth ages 17-21 will participate in the program in the winter and spring of 2019 and gain the opportunity to develop basic financial knowledge and abilities, along with the required competencies and social skills necessary for employment and advancement in the field of finance. Local banking and finance professionals have been involved from the very beginning, offering suggestions on industry-specific curriculum (including options from the American Bankers Association) as well as requirements and skills needed for success in the industry. The banking and finance team members have also met with the youth multiple times to share first-hand information about the industry including career pathways, internship and potential employment opportunities. Finance & Banking Career Pathway brochures are being developed in early 2019 by the Board to provide information to individuals interested in this priority sector.

- Professional Scientific & Technical Services has a projected increase of 12.4% of jobs from 2016 -2026
- Healthcare & Social Assistance has a projected increase of 12.2% of jobs from 2016-2026
- Finance & Insurance has a projected increase of jobs of 12.5% from 2016-2026

Accessible entry points within this industry offer individuals with less than a bachelor’s degree the opportunity for strong earning potential. Financial institutions often used the entry level teller position as the most common access point to career ladder progression, but this has lessened somewhat as the industry has adopted a “Universal Banker” model. Representing many skill sets required by a Customer Service Representative, the Universal Banker provides customer service across a wide range of traditional financial services such as basic transactions, new accounts, and loan applications. In 2015, the Bank Administration Institute named increased implementation of universal bankers as one of the most anticipated trends in retail banking and local employers and MassHire GBWB will continue working together to create training and strong pipelines of employees for the industry.

**Professional and Technical Services** offers a range of high-level services and with few exceptions, employers within this sector engage in activities that require high levels of expertise, advanced training and degree attainment. This has translated into strong growth prospects and high wages and has shown a steady growth rate of 8% from 2013-2016. As well, wages in this industry have increased 8.67% over the same period representing the fourth highest average weekly wage in the southeastern region ($1,505). The industry also has the third highest number of establishments in the region (3,748). In addition, many of the occupations within this sector, particularly in computer/IT occupations cut across multiple industry clusters. In most of these cases, the jobs
show strong projected growth. Examples include Computer Systems Analysts (16.4% projected long-term growth) and Computer User Support Specialist (11.1% projected long-term growth). MassHire GBWB continues to collaborate with the Greater New Bedford, Bristol and South Shore Workforce Boards to address the pipeline needs of local southeastern MA IT companies through sector-based training programs including developing and obtaining funding for the Southeastern MA Cyber-Security Training Program in conjunction with Bristol Community College. Trainings in Networking Technologies, Network Security, and Firewall Security are some topics that employers identified and have been incorporated into the program along with work-based learning through IT internships at local companies.

It is also significant to note that attracting industry within this sector is a regional economic development priority supported by both the workforce development and education sectors. To illustrate the point with one example, the Southeastern Regional Planning and Economic Development District’s (SRPEDD) Comprehensive Economic Development Strategy, Life Sciences already make up a majority of employment within the knowledge and technology-intensive industry clusters throughout the region. The same report cites efforts throughout the region to attract bio-tech companies to the area, further noting the MA Biotechnology Council ranks several area communities as “BioReady”. These efforts have been replicated in the region for different occupational clusters in an ongoing effort to attract knowledge-based occupations that offer high wages and career ladder opportunities.

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

The Brockton Workforce Area is a culturally and linguistically diverse region with a high percentage of foreign speaking and foreign-born/immigrants. Within the Southeast, Bristol and Plymouth County data (2011-2015 ACS gathered from American Factfinder) reveals educational attainment rates that are most often at the lower end of the Commonwealth’s regions. Within Bristol and Plymouth Counties the percentage of age 25-64 population with at least a high school diploma or equivalency is 87% and 94% respectively. As we move to post-secondary education, the differences between the southeast and the remainder of the state become more pronounced. In fact, Bristol County has the lowest percentage of adults with some post-secondary education (57%) while Plymouth County (66%) falls within the middle of the state range of 57-78%. Finally, the percentage of Bristol County adults with a bachelor’s degree is only 28% with Plymouth County at 37%. This puts the majority of the southeast region at the low end of the range (27-56%) of MA Counties. In looking at the combined southeastern data, 41% of individuals 25 or older have a high school diploma or less, 27% have some post-secondary or an Associate Degree while 27% hold a bachelor’s or higher (American Community Survey 5 Year Averages 2011-2015).

As mentioned, in addition to education levels, it is also important to note that a significant portion of residents require language or basic skill remediation to access specialized occupational training or post-secondary education. An examination of 2011-2015 averages reveals that 8% of the 18 and over population in the southeast are Limited English Proficient. That would translate to more than 85,000 individuals within the region. Similarly, 10% of the 18+ population, representing more than 106,000 individuals lack a high school diploma with approximately half of these at less than a 9th grade level in basic skills attainment. The obvious implication to this data is a clear need for integrated Adult Basic Education strategies with contextualized curriculum, increased intensity
Several strategies have been designed for workforce development activities, including education and training activities, in the Greater Brockton area, many of them implemented in partnership with agencies, organizations & institutions in the community. Through Board retreats, community engagement and discussions with our stakeholders, the strength of our community is highlighted by the partnerships, diversity and leadership that come together to understand the issues in our community and devise methods for resolution. Collaborations within our community are common and are augmented by dedicated staff within our economic, educational and workforce development partners, along with committed elected officials. Building upon valuable resources such as our transit system, which provides access locally and through the commuter rail into Boston, multiple Institutions of Higher Education: Massasoit Community College, Bridgewater State University, Stonehill College, Quincy College, UMass Boston & Dartmouth and a nationally recognized K-12 system in the lead city of Brockton there are many innovative and successful initiatives that help to brighten the outlook of our communities. The business community within the region falls in the strength column, with collaborations on economic and workforce development activities to contribute to the growth of the business and the community. Through mutually beneficial activities with Chambers, Industrial Park Associations and Sector Associations, partnership are formed that provide internships, co-op experience, mentoring and On-the-job training providing training for jobseekers and employers.

As in many urban settings, strengths can also be thought of as weaknesses – or opportunities for improvement. The community takes pride in the diversity of it’s citizens and neighborhoods, however, it create challenges for English language learners and economic advancement. Within the total population, 26% are foreign born, with 12.4% immigrating into the US between 2010 and 2015. Additionally, in home where English is not the first language, 18.5% speak less than “very well”, an increase from the 15.3% in 2010.

(4) Please provide an analysis of workforce development activities, including education and training, in the local area. This analysis must a) include strengths and weaknesses of workforce development activities b) address the capacity to provide the workforce development activities around: i. education and skill needs of the workforce; ii. individuals with barriers to employment; iii. employment needs of businesses.

Within our region we have UMass, Bridgewater State University, Massasoit Community College, Southeastern Vocational Technical HS, South Shore Vocational High School and nine comprehensive high schools, including the nationally recognized Brockton High. Having conducted several SWOT analysis, by sector and through community forums, the strengths and weaknesses from the educational standpoint is similar to that of business and workforce. The strengths of partnerships, innovative thinking and desire to progress is often countered with the weaknesses of financial insecurity and a negative image than many feel is undeserved. Regionally, we have reached our capacity to train and education individuals in certain high demand fields- especially health care (Nursing, Radiologic Technology, Occupational Therapy, etc.) and this challenges us to provide the pipeline needed for industry.
### 2014-2024 Most Jobs, Occupational Projections for Greater Brockton Workforce Board

<table>
<thead>
<tr>
<th>Clinical, Counseling and School Psychologists</th>
<th>Employment</th>
<th>Change</th>
<th>Annual average openings</th>
<th>2017 annual average OES wage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>2024</td>
<td>level</td>
<td>%</td>
<td>total</td>
</tr>
<tr>
<td>275</td>
<td>312</td>
<td>37</td>
<td>13.50%</td>
<td>12</td>
</tr>
<tr>
<td>Customer service</td>
<td>1030</td>
<td>1057</td>
<td>27</td>
<td>28</td>
</tr>
<tr>
<td>Dental assistant</td>
<td>622</td>
<td>596</td>
<td>-26</td>
<td>21</td>
</tr>
<tr>
<td>Healthcare social workers</td>
<td>846</td>
<td>906</td>
<td>60</td>
<td>32</td>
</tr>
<tr>
<td>Health Services Manager</td>
<td>356</td>
<td>379</td>
<td>23</td>
<td>14</td>
</tr>
<tr>
<td>Home Health aides</td>
<td>933</td>
<td>1168</td>
<td>235</td>
<td>59</td>
</tr>
<tr>
<td>Licensed practical nurses</td>
<td>433</td>
<td>446</td>
<td>13</td>
<td>16</td>
</tr>
<tr>
<td>Occupation</td>
<td>Number</td>
<td>Number</td>
<td>%</td>
<td>Number</td>
</tr>
<tr>
<td>-----------------------------------------</td>
<td>--------</td>
<td>--------</td>
<td>----</td>
<td>--------</td>
</tr>
<tr>
<td>Medical assistants</td>
<td>257</td>
<td>262</td>
<td>5</td>
<td>1.90%</td>
</tr>
<tr>
<td>Medical and clinical lab technician</td>
<td>147</td>
<td>155</td>
<td>0.40%</td>
<td>7</td>
</tr>
<tr>
<td>Medical Secretary</td>
<td>770</td>
<td>791</td>
<td>21</td>
<td>2.70%</td>
</tr>
<tr>
<td>Mental Health Counselors</td>
<td>240</td>
<td>260</td>
<td>20</td>
<td>8.39%</td>
</tr>
<tr>
<td>Nursing Assistant</td>
<td>1241</td>
<td>1311</td>
<td>70</td>
<td>5.60%</td>
</tr>
<tr>
<td>Personal Care Attendant</td>
<td>675</td>
<td>754</td>
<td>79</td>
<td>11.70%</td>
</tr>
<tr>
<td>Phlebotomist</td>
<td>254</td>
<td>276</td>
<td>22</td>
<td>8.70%</td>
</tr>
<tr>
<td>Pharmacy Tech</td>
<td>366</td>
<td>408</td>
<td>42</td>
<td>11.50%</td>
</tr>
<tr>
<td>Physical Therapist Assistant</td>
<td>334</td>
<td>438</td>
<td>104</td>
<td>31.45%</td>
</tr>
<tr>
<td>Physical Therapists</td>
<td>198</td>
<td>227</td>
<td>29</td>
<td>14.61%</td>
</tr>
<tr>
<td>Physicians and Surgeons</td>
<td>171</td>
<td>185</td>
<td>14</td>
<td>8.20%</td>
</tr>
<tr>
<td>Registered Nurses</td>
<td>2433</td>
<td>2627</td>
<td>194</td>
<td>8%</td>
</tr>
</tbody>
</table>

We recognize that our educational partners need to develop flexible pathways and occupational certifications to meet the immediate need of both the job seekers and employers and are developing
networks with Continuing Education Departments along with the support of the Superintendents of both of our Vocational schools to aide that effort.

5. Please describe your Board’s strategic vision to support regional economic growth and economic self-sufficiency. This must include goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment), and goals relating to the performance accountability measures based on performance indicators described in § 677.155(a)(1). The primary indicators of performance include:
   a) The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program; b) the percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program; c) Median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program; and d). The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within 1 year after exit from the program.

<table>
<thead>
<tr>
<th>Entered Employment</th>
<th>Employed in 2nd Quarter after exit</th>
<th>Employed in 4th Quarter after exit</th>
<th>Wage</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY18 Actual</td>
<td>FY19 Goal</td>
<td>FY19 YTD</td>
<td>% of Goal</td>
</tr>
<tr>
<td>Adult</td>
<td>86%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>86%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

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

With WIOA implementation and the formal integration of partners & services, the Career Center developed a new unified, cohesive customer flow that allows for all partners and programs to work together seamlessly and to ensure that duplication is minimized and efficiency is maximized, providing customers with a seamless, one-stop solution.

Services and workflow of various programs are integrated at the Career Center starting in the
reception area. Cross training occurs between Career Center staff and partners on their respective services provided at the Career Center. This training ensures appropriate referrals are made while remaining seamless to the customer. Customers are notified of all available partner services through the inclusion of partner descriptions during the CCS orientation. In addition, partner services are interwoven through the career action plan that each customer receives during orientation. The communication between partners and the customer awareness of various services, helps us achieve our vision and goals for these customers.

The Career Center has moved aggressively towards integration, even before required by WIOA. The Career Center manages customer flow and keeps customer appointments for many of the partnering agencies, in addition to managing the daily flow of DUA claimants and providing translation services. The Career Center also shares job leads and employment opportunities with our partners to aid our customers in their employment search.

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

1. Identify the following elements of the workforce development system in your local area:
   a. Programs that are included in your local workforce system (please list programs)
   b. How your Board will support the strategy identified in the State Plan and work with the entities carrying out core programs and other workforce development programs, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) to support service alignment;

Wagner Peyser 90/10% Federal funds from the United States Department of Labor that are used in the Career Center for basic services, including career planning and assessment, educational assessment, employment statistics, community resources and support services, and workshops. These are considered “flexible” funds and can be used to assist all customers in the Career Center and are used to provide “core services.”

One Stop Career Center Massachusetts budget appropriation dedicated to the overall operation of the Career Centers.

Workforce Investment Act (WIOA) Title I Adults From the United States Department of Labor this program teaches job skills and provides placement services for economically disadvantaged adults. This program is for customers who meet very specific income and eligibility criteria established by the Department of Labor.

Workforce Investment Act (WIOA) Title I Dislocated Workers From the United States Department of Labor this program is for workers who are permanently laid off or who have received notice of termination or lay off. These funds are not flexible, and must be used for customers who meet very specific criteria established by the Department of Labor.

National Dislocated Worker grants The US Department of Labor allocated funds specifically for workers affected by the mass lay-offs at local companies, these are multi-year programs.

Re-employment Assistance Program (RESA) From the United States Department of Labor this
program is for workers who are collecting unemployment insurance to provide them with an eligibility assessment and a plan for reemployment.

**Trade Adjustment Act (TAA)** From United States Department of Labor, this program helps workers who have lost their jobs as a result of foreign trade to quickly rejoin the workforce by providing them with the means to attain competitive and marketable skills for today’s increasingly competitive work environment.

**Department of Transition Assistance (DTA)** DTA maintains an employee at the Center, as well as additional career counseling and training services provided by CareerWorks staff.

**Division of Unemployment Assistance (DUA)** Division of Unemployment serves customers who apply for unemployment benefits, this programitionally, provides for staff support and equipment for the UI Online program.

**Mass Talent Connect** This program administered by the MassHire Hampden County Workforce Board, for providing additional and more intensive services to long-term unemployed customers.

**Rapid Response:** These funds provided through DCS Rapid Response are to bridge funding needs while awaiting National Dislocated Worker Grant funding or modifications.

**Services to Veterans**
This past year, the Career Center continued its collaboration with the MassHire GBWB Brockton Regional Veterans Support Council and the state Disabled Veterans Outreach Program (DVOP) to provide career information services and priority service to our Veteran job seekers and eligible dependents. The Career Center staff identify Veterans during every interaction at our Front Desk and particularly when receiving job seekers at the Career Center Seminar (CCS). The Career Center screens all Veterans for significant barriers to employment (SBE) in order to make appropriate referrals to the DVOP. This past year, six Veterans received re-training through Title I enrollment and many Veterans have been successfully served through the RESEA program.

Every month, in conjunction with the DVOP, the Career Center provides a CCS orientation to all Veterans working with the local Brockton Veterans Administration (VA) Reach Program. These SBE Veterans receive an introduction to all Career Center resources and are encouraged to visit any Career Center and to use the system’s associated websites for employment assistance.

Every November, the Career Center staff, in coordination with the DVOP sponsor a career services and employment event specifically for Veterans. This past year, in recognition of "Hire a Veteran" Month (November), a job fair took place that gave special priority to Veterans in attendance. The Career Center staff also participate in and promote MassHire GBWB sponsored Regional Veterans Council.

**ESOL/ABE Partnerships – Adult and Community Learning Services and the Massachusetts Department of Elementary and Secondary Education (DESE)**
The Career Center has a long-standing history of working adults with ABE and ESOL needs. The career center has partnered with Training Resources of America to provide outreach and English language assessment testing every Thursday at the Career Center. In addition, the English for Employment program has been jointly taught and facilitated by the Brockton Public Schools’ Adult Learning Center and the Career Center since 2000. The participants in this class generally come
from Cape Verde, other countries in Africa, South America, Haiti and Asia. The program was created to help non-native English speakers develop the practical language skills needed to search for employment. Over the years, it has taught Brockton area adults how to prepare a compelling resume, interview confidently, and use the computer for job search opportunities. The 11-week course, which takes place three times each year, is open to non-native English speakers who are legally authorized to work in the United States and who are seeking new or better jobs. The curriculum includes: testing and evaluation, MS Word, resume writing, job applications, interviews, Linked-In, cover letters, thank you notes, and telephone protocols. The program, which is free to eligible adults, is funded by the Massachusetts Department of Elementary and Secondary Education, the Brockton Public Schools, the Career Center and MassHire GBWB.

**Brockton Neighborhood Health Center**
For the past ten years, Brockton Neighborhood Health Center has collaborated with the Career Center to provide outreach and enrollment services for the Brockton area and surrounding communities applying for the state health insurance. The Health Center has provided much needed assistance to hundreds of residents seeking health insurance. On-site at the Career Center three days a week, they provide education and enrollment assistance, often individually and sometimes in a group setting.

**Massasoit Community College (MCC)** –
Massasoit Community College staff continued their collaboration with the Career Center this past year, making themselves available twice every month to meet with customers interested in continuing their education. MCC staff conduct orientation meetings and address individual questions and concerns customers have regarding their training programs.

**Community Involvement – The Haven**
The Career Center provides monthly orientations and discusses job search skills such as resumes and interviewing techniques. The Haven is a venture of cooperation and goodwill for the sake of building a more unified community which seeks to be a refuge during the day for those who may be experiencing homelessness.

**Volunteers** Business Services continued to lead the Career Center’s unique volunteer program. Job seeker volunteers with backgrounds in human resources, computer proficiency and training & development assist the Career Center with workshops and job seeker concerns. Nearly every month, at least one volunteer facilitated a workshop such as Interviewing for Success or Dynamic Resumes.

**Other Programs with Partner Agencies**
- Massachusetts Commission for the Blind
- Massachusetts Rehabilitation Commission
- The Adult and Community Learning Services
- The Senior Community Service Employment Program

(2) Please describe how your Board will work with entities carrying out core programs to:
  a) Expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with
barriers to employment;

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

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

2 (i). The Board will continue working with our mandated and community partners by developing a robust referral system that makes the most of all individual partners. We see the expansion growing with the relationship that has been developed with the Department of Unemployment Assistance. This referral system will target those that have barriers to employment and leverage resources from each agency, such as access to training through the workforce system and support services from DUA while in training and transition.

(ii) The Workforce Board, Career Center, secondary & postsecondary educational institutions and industry experts have worked to develop career pathways in the priority industries of healthcare, manufacturing and finance. At each step of the process, individuals are provided case management and financial support to continue their advancement on a pathway for a sustainable career.

The healthcare pathway originates with English language skills and advances through the Home Health Care certification at a minimum and through Certified Nursing Assistant, with opportunities for individual advancement. The Board has continued to foster this pathway for eligible adults and out of school youth by designing and implementing a state approved Healthcare lab.

In manufacturing, there are several pathways that have been prioritized by our employer partners: CNC machinists, welding and quality assurance. Training starts with the fundamentals and a certificate level training, with advancement through degree programs at local institutions of higher education.

The pathway for finance has been developed based on statistical data of projected occupational demand and data from local employer engagement. Currently implementing an introduction to Banking & Finance curriculum provided by the American Bankers Association to our of school youth, an Advisory Board consisting of eight local financial institutions have committed to providing internship and guidance to these youth over the course of the program. The certification and support offered in this program will lead to entry level positions in financial institutions and continue with professional development offered through employer benefits.

(iii) To improve access to postsecondary credentials, the Board has aggressively sought out educational partners that provide training leading to recognized credentials to inform our eligible customers. Recognizing the barriers some of our customers face, we prioritize programs that include tutoring, access to resources and flexible scheduling. The Board also provides access to technology for youth who are interested in pursuing their continued education online. In addition to annual meetings with our training vendors, the Board has issued a Request for Qualifications for group training in the healthcare field and will be issuing a broader Request in spring 2019.

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

(i) To facilitate engagement of businesses in workforce development programs, including small businesses and businesses in in-demand industry sectors and occupations; (ii) To
serve agricultural businesses and how you intend to improve those services; (iii) To support a local workforce development system that meets the needs of businesses in your area; (iv) To better coordinate workforce development programs and economic development; (v) To strengthen linkages between the Career Center delivery system and unemployment insurance programs; (vi) To strengthen linkages between the Career Center delivery system and unemployment insurance programs -

a. What methods are used by the Board to identify and recruit business intermediaries
b. Specifically, what procedures are in place to offer Career Center Business Services and Mass BizWorks programs to local businesses

(vii) That may include the implementation of initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies designed to meet the needs of regional businesses. These initiatives must support the strategy described in paragraph (b)(3) of this section;

3 (I)
To facilitate the participation of businesses in workforce development activities, the Board has adopted several strategies. Having a designated staff as Manager of Employer Services (MES) to coordinate and track employer engagement amongst all our programs is critical to developing a comprehensive communication system. The MES coordinates membership and staff participation to several Chambers and business associations; Metro South Chamber, Easton Chamber, Stoughton Chamber along with the Avon Industrial Park Association, the East Bridgewater Business Association and the Bridgewater Business Association. This communication enables staff to engage businesses for workforce activities such as pipeline & incumbent workers, mentoring & internship and labor market information on regional and occupational trends.

The Board also conducts industry specific CEO Roundtables in high priority fields to engage and understand the concerns and needs of businesses. The roundtables have allowed us to develop strategies for the incumbent workforce through mechanisms such as the MA Workforce Training Fund and pipeline workers through internships and co-ops. Bridging off of the CEO roundtables, an additional advisory board has been formed which is comprised of Human Resources staff, providing continuous avenues for communications and engagement.

(ii) To engage agricultural businesses in our area we have reached out to Migrant Worker Associations to open communications and determine specific needs. The primary agricultural crop is cranberries, which are present in the Whitman/Hanson section of our region and represent independent and co-op growers. Cranberries are the largest food crop in Massachusetts, which is the second-largest producer of cranberries in the country. Experts say the industry generates about $1.4 billion in economic activity from more than 13,500 acres of cranberry bogs, mostly in the southeastern portion of the state.

(iii) To support our local workforce development system the MassHire Greater Brockton Workforce Board offers workshops on the MA Workforce Training Fund, Safety grants through the Department of Industrial Accidents along with presentations on specific labor market information such as industry and occupational projections.

(iv) The strategies and services employed in our region to coordinate workforce and economic development include representation on the MassHireGBW Board by the Executive Director of the
Regional Planning Agency, who has played an active role for many years and currently serves as Clerk for the organization. In turn, workforce is also represented on the Comprehensive Economic Development (CEDS) committee, to ensure consistent communication. As collaborators, we also team up to bring coordinated services to new businesses in the region, including services provided by Chambers, financing agencies, regional planners and local officials.

(v) To strengthen linkages between the Career Center delivery system and unemployment insurance programs the Board and the Career Center identifies and recruits business intermediaries through our Business Services and Mass BizWorks programs. The Career Center follows the leadership of MassHire GBWB in working with our core partners to leverage relationships with the business community. We participate in conversations and activities that will develop career pathways and sector strategies that are responsive to the workforce realities of our region. Working with our partners, our goal is to develop a job placement system that is truly “integrated.” The key principles of this job placement system are:

- There is “no wrong door” for businesses to receive services. All business services provided by The Career Center are consistent and available to every business contact. Business Service Representatives (BSRs) function as business consultants in this capacity, identifying the appropriate service for the company’s location in any given business cycle.
- As a regional single point of contact, The Career Center coordinates our efforts with all business partners.
- Career Center staff are qualified to lead and facilitate industry sector conversations.
- Everyone has a role in collecting business intelligence because meeting regional business needs is in the best interest of the region’s workforce. This activity is another way in which our BSRs operate as business consultants.

To support the business community, The Career Center’s BSRs inform business customers about employee training grants through the Workforce Training Fund, Safety Grants through the Division of Industrial Accidents (DIA), services such as the Workshare Program through the Department of Unemployment Assistance (DUA), and the Tax Incentive Program available through the Massachusetts Office of Business Development. This last program is called the Economic Development Incentive Program (EDIP) and is designed to foster job creation and stimulate business growth throughout the Commonwealth. The chart below outlines The Career Center business services customer flow highlighting the business visitation program, available state programs and labor exchange services.

A summary analysis of company visits, recruitments and job fairs across industry sectors for the past fiscal year is provided below. One can see that, in general, The Career Center’s staff were most active with businesses in Health Care and Social Assistance, Administrative Support and Waste Management, Retail Trade, Transportation and Warehousing, and Manufacturing – Metal, Metal Products, Machinery.

<table>
<thead>
<tr>
<th>Industry Sector</th>
<th>Recruitments</th>
<th>Site visits</th>
<th>Job Fairs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manufacturing</td>
<td>2</td>
<td>23</td>
<td>14</td>
</tr>
<tr>
<td>Health Care and Social Assistance</td>
<td>2</td>
<td>17</td>
<td>55</td>
</tr>
<tr>
<td>Education Services</td>
<td>1</td>
<td>4</td>
<td>10</td>
</tr>
<tr>
<td>Industry</td>
<td>FY 18 Goal</td>
<td>FY 18 YTD</td>
<td>% of Goal</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>------------</td>
<td>-----------</td>
<td>-----------</td>
</tr>
<tr>
<td>Retail</td>
<td>4</td>
<td>50</td>
<td>31</td>
</tr>
<tr>
<td>Transportation and Warehouse</td>
<td>2</td>
<td>10</td>
<td>16</td>
</tr>
<tr>
<td>Accommodation and Food Service</td>
<td>0</td>
<td>24</td>
<td>2</td>
</tr>
<tr>
<td>Security Services</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Construction</td>
<td>0</td>
<td>5</td>
<td>7</td>
</tr>
<tr>
<td>Finance and Insurance</td>
<td>0</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>Administrative and Support and Waste Management</td>
<td>13</td>
<td>7</td>
<td>33</td>
</tr>
<tr>
<td>Wholesale Trade</td>
<td>1</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>Real Estate</td>
<td>1</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Other Services Except Public Administration</td>
<td>0</td>
<td>9</td>
<td>9</td>
</tr>
<tr>
<td>Professional Science Technical Services</td>
<td>0</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Information</td>
<td>0</td>
<td>1</td>
<td>5</td>
</tr>
<tr>
<td>Public Administration</td>
<td>3</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>Arts, Entertainment, and Recreation</td>
<td>0</td>
<td>10</td>
<td>1</td>
</tr>
</tbody>
</table>

**Business Services and Company Visits**

The MassHireGBWB oversees the services that the Career Center provides to employers and establishes annual target performance measures. The Career Center is proud of the overall volume and quality of services provided to employers in our region this past fiscal year, as reflected in the following table.

<table>
<thead>
<tr>
<th>Employers Served</th>
<th>FY 18 Goal</th>
<th>FY 18 YTD</th>
<th>% of Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Served</td>
<td>600</td>
<td>727</td>
<td>121%</td>
</tr>
<tr>
<td>New to the Career Center *</td>
<td>300</td>
<td>409</td>
<td>136%</td>
</tr>
<tr>
<td>Repeat Employer Customers *</td>
<td>300</td>
<td>318</td>
<td>106%</td>
</tr>
<tr>
<td>Employer Listing Job Orders</td>
<td>300</td>
<td>304</td>
<td>101%</td>
</tr>
</tbody>
</table>

Career Center staff connected with 727 distinct businesses this past year, an average of 14 companies per week. We are proud of the over 1,415 contacts we had with businesses over the year, 179 of which were face-to-face meetings at the company. 794 job postings were received from a total of 304 companies.

(4) Please provide an examination of how your Board will:
• Coordinate local workforce investment activities with regional economic development activities that are carried out in the local area
• Promote entrepreneurial skills training and microenterprise services;

The Executive Director of the Regional Planning Agency serves as the Clerk of MassHireGBWB and participates in a decision making role through the Executive Committee. This interaction is complemented by participation in the Comprehensive Economic Development Strategy for the region.
The Executive Director of the MassHireGBWB is also a Board member on the Brockton 21st Century Corporation, the economic arm of the City of Brockton and a member of the Brockton Economic Partnership, a privately driven group encouraging economic growth in the city and the region. Through the Brockton Economic Partnership, the Board encourages Entrepreneurship and small business growth. The development & administration of a Micro loan fund through this group will stimulate the development and expansion of business services to entrepreneurs, specifically in the downtown Brockton section.

The MassHireGBWB believes entrepreneurship is an employment strategy that can lead to economic self-sufficiency for any individual. Entrepreneurship is more than the process of starting a business; it is about identifying, valuing and capturing opportunities. Youth Entrepreneurship is a youth development strategy that has become increasingly popular in the recent years. This initiative was designed to provide the youth and youth educators in our region with entrepreneurial training opportunities, tools to develop a business plan, exposure to successful young entrepreneurs, information on making sound financial decisions, and how to utilize various entrepreneurial development services. These youth and youth educators have the chance to engage in entrepreneurial efforts within their schools and/or in their communities. Through the course of the year, MassHireGBWB presents monthly workshops related to Entrepreneurialism, alternating activities for youth and activities for professional staff & faculty. With this strategy, MassHireGBWB will be able to assist the youth in discovering different career paths and will be able to provide professional development to faculty for transference in the classroom. MassHireGBWB has now been running our Business Plan for ten years, producing new opportunities for the young adults in our region.

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

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

MassHireGBWB is charged with overseeing Brockton’s workforce development system so that it serves the interest of both area residents seeking employment and employers in an efficient, effective, and well-coordinated manner. MassHireGBWB will achieve this by monitoring the CareerWorks program and fiscal operations, assessing their performance, providing technical assistance and capacity building, and setting policy. The Workforce Systems Committee will be the main vehicle for performance review through the implementation of the annual Charter review process. MassHireGBWB has the responsibility, as the organization that is granting the Charter, to ensure high quality service delivery, achievement of performance outcomes, and productive and efficient use of public dollars. Except as limited by available funding, MassHireGBWB will fulfill the functions of Policy and Oversight and Monitoring of Quality. MassHireGBWB shall serve as the policy and oversight body in the Brockton region for the development of the policy framework for the OSCC Initiative and for decisions regarding allocations of workforce development funds in the region. MassHireGBWB shall monitor the OSCC quality, outcomes, and cost performance through the following measures: on-site visits and record review, third party evaluations and review, computerized customer flow and outcome records and monthly performance reports as established by the WIB.

The Career Center obtains daily feedback from customers about their experience at the center which is sent to the Workforce Systems Committee of the Board for review & analysis. The
management team of the Career Center and staff review this feedback in an effort to continually improve effectiveness meeting our business and job seeker customer needs.

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

The Career Center has adopted and stressed a system of multiple access points to our services. We continuously assess the needs of specific populations and work hard to ensure that we flexibly and creatively provide the most options to access our services as is practical. The first potential barrier to receiving services is the access point at which a customer may become a career center member. Under the One Stop system, a customer must become a member before receiving services at a career center. The Career Center has adopted an entirely paperless, on-line system for becoming a member. For those customers who wish to register on their own, they may do so on-line using the technology tools of their choice. For those who are working with partnering agencies, they may apply and become members at the partnering agency’s location. Customers may still come to The Career Center to become a member as they always have, and staff in the Resource Room are available to assist them with the process should they require assistance using the computer.

Additionally, the next step to becoming a member is registering for a Career Center Seminar (CCS). This may be done on-line as well. This solution ensures that new customers may register and become members 24 hours a day, seven days per week. Additionally, The Career Center coordinates and integrates systems between our partners. Through training, information sharing, and the integrated services described in the MOU, staff of partnering agencies are able to make referrals and recommendations for Career Center involvement from their own locations. The Career Center Seminar, our flagship orientation program is a first step for all new members and is required to be conducted in person. In an effort to increase subsequent access to the information provided. The Career Center offers CCS in a video format for customers whose schedule precludes attending a group session. This video is also offered in Spanish and Portuguese for customers who speak those languages.

MassHire GBWB plans to bring education/training to the neighborhoods, housing developments and businesses across the region via Mobile Learning Labs. The innovation of this program is the method of delivery, reaching directly out to the underserved neighborhoods by utilizing Mobile Learning Lab to offer information and training that is dictated by the direct involvement of sector experts. We will meet the demand of our employers by providing occupational and language skills to those local individuals who are unemployed or underemployed, thereby increasing the economic base of our residents and our businesses. In addition to a different delivery method, our plan will utilize local labor market information and our Southeastern MA Labor Market Blueprint to drive the selection of training courses resulting in a skilled workforce. The Board’s Business & Industry Committee will serve as an advisory to the Mobile Learning Labs for the current workforce and share industry specific information enhancing the pipeline by aligning curriculum with industry needs. Vetted with workforce, economic, education and employer partners, we’re in agreement that this investment will move the needle for many individuals in our community and serve as a foundation for building economic stability through a skilled workforce. MassHire GBWB Board member, Brockton Area Transit provided a bus that was stripped down in late 2018 and will be redesigned at one of our vocational school partners as a mobile learning lab equipped with computers and technology.
f) How entities within the Career Center system, including Career Center operators and partners, will comply with WIOA sec. 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities;

The Board and Career Center provides individuals with disabilities an equal opportunity to participate in and enjoy the benefits of the WIOA Title I program or activity, and CareerWorks furnishes appropriate auxiliary aids or services where necessary.

To determine what type of auxiliary aid or service is appropriate and necessary, such recipient must give primary consideration to the requests of the individual with a disability. Primary consideration means honoring the choice unless the Career Center can demonstrate that another equally effective means of communication is available, or that using the means chosen would result in a fundamental alteration in the service, program, activity, or undue financial and administrative burdens.

The Career Center may not place a surcharge on an individual with a disability, or any group of individuals with disabilities, to cover the costs of measures associated with providing auxiliary aids, services, or assistive technology, that are required to provide that individual or group with the nondiscriminatory treatment required by WIOA Title I. This obligation does not require CareerWorks to provide personal devices, such as wheelchairs; prescribed devices, such as prescription eyeglasses or hearing aids; or readers for personal use or study.

If an individual with disabilities elects not to participate in an available separate or different program or service, and instead chooses to participate in available WIOA Title I financially assisted programs and activities, the obligations regarding auxiliary aids, services, and assistive technology still apply.

With regard to aid, benefits, services, training, and employment, a recipient must provide reasonable accommodation to qualified individuals with disabilities who are applicants, registrants, eligible applicants/registrants, participants, employees, or applicants for employment, unless providing the accommodation would cause undue hardship.

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

The Career Center will maintain an Access Coordinator who is well versed in ADA requirements, who is Craig Kennedy, Manager of Finance and Administration and is supported by the University of Massachusetts Human Resources Department. All the Career Center marketing and recruitment material will include people with disabilities as one of the groups served.

All of the Career Center’s marketing and recruitment material shall state that adaptive equipment is available on request. CareerWorks shall maintain the following equipment in the disability’s cubicle
in the Resource Room or be available for use in the Resource Room:

- ZoomText
- Jaws
- Scanner for Jaws/ZoomText
- Braille Labeler
- Assistive Listening devices
- Text TTY at each OSCC
- Height Adjustable Tables
- Tape Recorder
- Trackball Mouse
- Hands –free voice activated software
- Additionally, presentations using projectors will use LCD projector

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

There are several programs and activities identified in the Workforce Investment and Opportunity Act that shall make their services available to customers through the OSCC Delivery System. The Act identifies programs that are required partners as well as additional human resource programs that may be partners in the one-stop. Among those required partners are; Adult Education, Postsecondary Vocational Education, Vocational Rehabilitation, Title V of the Older Americans Act, Trade Adjustment Assistance, Veterans Employment and Training Programs, Community Services Block Grant, Employment and training activities by the Department of Housing and Urban Development, Unemployment Insurance, Job Corps and Bureau of Apprenticeship and Training.

The relationships have grown through constant communication, whether it is in a monthly group setting or individually, peer to peer, the **partnership with the Department of Transitional Assistance demonstrates this success.** The Career Center partnered with the Department of Transitional Assistance’s (DTA) Work Program Participant (WPP) staff to provide targeted job search assistance and support to WPP customers. The Career Center developed an intensified eight-week program consisting of customers meeting with our staff every Monday and Tuesday from 9:30-12:30. The first four weeks of the program consist of group job search readiness training and the final four focus on individual counseling and in some cases training. The Career Center staff attended orientation at the DTA office every Thursday to explain the services and recruit for the program. DTA Full Engagement Workers are also present one of the days to provide customer assistance. During FY 18 the Career Center provided services to 98 WPP customers. 38 were enrolled in the WIOA Title I Adult program with 24 finding employment at an average wage of $14.43 per/hr. We look forward to another successful program during FY 19.

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

A small percentage of job seekers request individualized career services through a Career Specialist, and these job seekers comprise the Adult and Dislocated Worker groups of the Title I of WIOA. The Career Center is able to provide these job seekers with the following services:

- Comprehensive assessments, development of an individual employment plan,
- Group and individual counseling,
- Career planning,
- Short-term pre-vocational services including development of learning skills,
- Communication skills,
- Interviewing skills,
- Workforce preparation activities,
- Financial literacy services,
- English language acquisition,
- Integrated education and training programs.
The following charts show the Career Centers success in meeting its FY 18 performance goals, both for numbers of participants and for employment outcomes.

### WIOA Participant Enrollment Performance Goals

<table>
<thead>
<tr>
<th></th>
<th>FY 18 Goal</th>
<th>FY 18 Actual</th>
<th>% of Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Adult Total Participants</strong></td>
<td>105</td>
<td>119</td>
<td>113%</td>
</tr>
<tr>
<td><strong>Adult New Participants</strong></td>
<td>66</td>
<td>78</td>
<td>118%</td>
</tr>
<tr>
<td><strong>Dislocated Worker Total Participants</strong></td>
<td>242</td>
<td>268</td>
<td>111%</td>
</tr>
<tr>
<td><strong>Dislocated Worker New Participants</strong></td>
<td>105</td>
<td>129</td>
<td>123%</td>
</tr>
</tbody>
</table>

### WIOA Placement and Wage Performance Goals

<table>
<thead>
<tr>
<th></th>
<th>FY 18 Goal</th>
<th>FY 18 Actual</th>
<th>% of Goal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Adult Employments</strong></td>
<td>55</td>
<td>52</td>
<td>95%</td>
</tr>
<tr>
<td><strong>Adult Wage</strong></td>
<td>$13.00</td>
<td>$14.39</td>
<td>111%</td>
</tr>
<tr>
<td><strong>Dislocated Worker Employments</strong></td>
<td>124</td>
<td>130</td>
<td>105%</td>
</tr>
<tr>
<td><strong>Dislocated Worker Wage</strong></td>
<td>$17.00</td>
<td>$20.26</td>
<td>119%</td>
</tr>
</tbody>
</table>

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

The Department of Career Services (DCS), as the Commonwealth's Dislocated Worker service entity, is responsible for providing all pre-layoff, early intervention Rapid Response activities (WIOA Sec. 3(51)) in coordination with Local Workforce Development Boards (WDBs) and Chief Elected Officials (CEOs). These activities are provided as part of a comprehensive workforce development system designed to respond quickly to a company that provides notice under the Worker Adjustment and Retraining Notification Act (WARN), a general announcement of a plant closing or other notification when a layoff appears imminent. It is the responsibility of the DCS Rapid Response Team to plan and provide early, on-site intervention services to assist dislocated workers, to promote their efficient and rapid transition into gainful employment, and to notify the Local Workforce Boards and Chief Elected Officials of these services.

All staff who work with employers experiencing a dislocation or closing coordinate the Rapid Response relationship with the Career Center director as well as the state manager regarding all closings and dislocations in the Brockton area.

- In the instance of the Career Center hearing about a layoff or closing, a member of the Career Center’s management team will immediately notify the Rapid Response Team so on-site services can be set-up.
- When appropriate, the Career Center management staff will attend initial company meeting with the Rapid Response team.
• Upon determination of services the Career Center staff may attend initial employee orientation meetings.
• In cases where on-site services are not possible the Career Center will provide space for Rapid Response to hold orientation sessions.
• the Career Center Business Services Unit will coordinate with the Rapid Response team to secure employers to attend on-site job-fairs.
• the Career Center will review Rapid Response referral reports as received to assist in planning services to customers.
• In cases of large dislocations, the Career Center will coordinate with Rapid Response to develop National Dislocated Worker Grant proposals.

(8) Please provide a description and assessment of the type and availability of youth workforce investment activities in your area including activities for youth who are individuals with disabilities, which must include an identification of successful models of such activities.

a. Please also provide a description of youth workforce investment activity coordination with the Department of Transitional Assistance, Massachusetts Rehabilitation Commission, and Massachusetts Commission for the Blind.

MassHire Greater Brockton Workforce Board (GBWB), through the Masshire Greater Brockton Youthworks (GBY) center offers universal access to a system of year-round workforce development programs for our region’s youth. The site functions as a hub of high-quality employment, training, and supportive services for 14-24-year-olds residing in the Brockton Service Delivery Area (SDA).

**Group Trainings**

Training services are provided to eligible youth under WIOA Title I through the use of group training. MassHire Greater Brockton Workforce Board (GBWB) recognizes emerging industries and occupations that offer higher wages and more stable employment and in response will commit to contract group trainings to provide pathways to good jobs, and that meet specific industry needs at a reduction in cost.

**ITA Training**

Under Title I of WIOA, Individual Training Accounts (ITA) allow individual job seekers, who need occupational skills training in order to successfully reenter the workforce, to choose from a pre-approved list of training courses. A key tenet of the Workforce Innovation Opportunity Act is that adults, dislocated workers and youth who have been determined to need training, may access training with an ITA.

**CAP Program**

The Connecting Activities Programming, funded through the Department of Elementary and Secondary Education, is designed to enhance, complement and support other programming in the school and community, so that youth can experience a range of opportunities as they develop college and career readiness throughout their high school years. Internships assist students in making more informed decisions about the education they need to be successful in a variety of career paths, including college, technical training, apprenticeships, and more.
**Summer Jobs Program**

MassHireGBWB, in conjunction with the City of Brockton has been responsible for providing summer employment opportunities to Brockton youth. These entities work to ensure that youth gain valuable workforce experience and have a safe, productive way to spend their time throughout the duration of the summer.

Masshire Greater Brockton Workforce Board (GBWB) has Memorandum of Understanding (MOU) with Department of Transitional Assistance, Massachusetts Rehabilitation Commission, and Massachusetts Commission for the Blind to facilitate a seamless, customer-focused network that aligns service delivery activities across the board and enhances access to program services amongst each agency. Per the Workforce Innovation and Opportunity Act, the following 14 program elements are to be provided to youth:

<table>
<thead>
<tr>
<th>YOUTH SERVICES/ACTIVITIES</th>
<th>Alternative secondary school services, or dropout recovery services, as appropriate.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tutoring, study skills training, instruction, and evidence-based dropout prevention and</td>
<td>Occupational skill training, which shall include priority consideration for training</td>
</tr>
<tr>
<td>recovery strategies that lead to completion of the requirements for a secondary school</td>
<td>programs that lead to recognized postsecondary credentials that are aligned with in-</td>
</tr>
<tr>
<td>diploma or its recognized equivalent (including a recognized certificate of attendance or</td>
<td>demand industry sectors or occupations in the local area involved.</td>
</tr>
<tr>
<td>similar document for individuals with disabilities) or for a recognized postsecondary</td>
<td></td>
</tr>
<tr>
<td>Paid and unpaid work experiences that have as a component academic and occupational</td>
<td>Leadership development opportunities, which may include community service and peer-</td>
</tr>
<tr>
<td>education, which may include:</td>
<td>centered activities encouraging responsibility and other positive social and civic</td>
</tr>
<tr>
<td>Summer and other employment opportunities available throughout the year, pre-apprenticeship</td>
<td>behaviors, as appropriate.</td>
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<tr>
<td>programs, internships and job shadowing, and on-the-job training opportunities.</td>
<td></td>
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<tr>
<td>Education offered concurrently with and in the same context as workforce preparation</td>
<td>Adult mentoring for the period of participation and a subsequent period, for a total</td>
</tr>
<tr>
<td>activities and training for a specific occupation or occupational cluster.</td>
<td>of not less than 12 months.</td>
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<tr>
<td>Supportive services.</td>
<td>Comprehensive guidance and counseling, which may include drug &amp; alcohol abuse</td>
</tr>
<tr>
<td></td>
<td>referral.</td>
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<tr>
<td>Follow-up services for not less than 12 months after the completion of participation,</td>
<td>Entrepreneurial skills training.</td>
</tr>
<tr>
<td>as appropriate.</td>
<td></td>
</tr>
<tr>
<td>Financial literacy education.</td>
<td>Activities that help youth prepare for and transition to postsecondary education</td>
</tr>
<tr>
<td>Services that provide labor market and employment information about in-demand industry</td>
<td>and training.</td>
</tr>
<tr>
<td>sectors or occupations available in the local area, such as career awareness, career</td>
<td></td>
</tr>
<tr>
<td>counseling, and career exploration services.</td>
<td></td>
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</table>
(9) Please explain how your Local Board will coordinate relevant secondary and postsecondary education programs and activities with education and workforce investment activities to coordinate strategies, enhance services, and avoid duplication of services.

The local Board has several mechanisms to coordinate secondary and post-secondary activities, primarily amongst them are the Young Adult Initiative Council (YAIC) and the Connecting Activities program funded by the Department of Elementary and Secondary Education. The Chair of the YAIC is a Director at Bridgewater State University and 9 schools are represented, bringing discussion and collaboration together on a monthly basis. The meetings focus on current successes and challenges that are part of the service delivery to youth.

Coordinating services through Connecting Activities, we are able to leverage resources to collaborate with current programming offered at the Secondary level such as DECA, Co-Op and internships, providing a holistic approach to career identification and work readiness. Our current work in developing a blueprint for regional collaboration, funded also under the Connecting Activities programming, has identified pathways in priority industries along with support systems that will enhance opportunities for success. The Blueprint can be accessed on the MassHireGBWB website and is included as an attachment to this plan.

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

The Board coordinates WIOA Title I services related to transportation issues with cooperation from the Brockton Area Transit Authority, of which the CFO serves on the Workforce Board. This coordination includes streamlining student purchases for internships and summer jobs along with promoting programs that will enable adults to better their employment options. We also rely on the Old Colony Planning Council to help us understand traffic patterns for incoming businesses and capital improvement recommendations.

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

When meeting with customers of the region, one of the first steps is to identify needs and then assets available from various partner agencies. The consistent Partner meetings that have been held within the Greater Brockton Service Delivery Area have resulted in a successful referral system between agencies and a process for delivering services. Partner agencies attend each other staff meeting for program and service updates and continual communications.

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

MassHire Greater Brockton Career Center will make “labor exchange services” available to migrant and seasonal farmworkers by offering services as follows:

(i) Self-service;
(ii) Facilitated self-help service; and
(iii) Staff-assisted service;
All business services are extended to agricultural employers
* Agricultural employers can benefit from WOTC, trade, veterans, bonding programs, job order /
recruitment services, etc.
* When posting Agricultural job orders, there will be five day follow-up with employers and
customers.
* Business service representatives will contact the employer if an agricultural applicant is rejected.

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

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

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

The MassHire GBWB is keenly aware that the requirement for all industries of middle skilled
workers will continue to be education and training beyond a high school diploma for both current
and future job seekers. Certifications specific to industries and occupations are required for
progression from entry level positions to higher levels of pay, skill, responsibility, or authority.
However, there are many individuals in the region who have been working in unskilled labor
positions in an increasingly limited pool of jobs because they lack the skills necessary to enter into
middle skills jobs - better paying jobs, a step up from entry level and that require individuals to be
able to compute, problem solve and document in English at an educational level greater than a high
school diploma. The lack of literacy of some individuals in the MassHire GBWB region not only
keeps them from entering these jobs but also denies them from access of middle-skill education and
training programs, restricting their productivity in the labor force and limiting their path to economic self-sufficiency. They require literacy, skills training, and education to acquire jobs with sustainable wages. There is a need in the MassHire GBWB area as well as southeastern MA for integrated Adult Basic Education strategies with contextualized curriculum and potentially integrated ABE/Occupational training programs.

There continues to be a high demand from the local individuals seeking ESOL training which is evident by long standing lists for openings at local adult learning centers where limited English proficient individuals learn to improve their English language abilities. MassHire GBWB continues to work closely with the MA Department of Elementary & Secondary Education (DESE), following DESE’s 2018 process of selecting local ABE/ESOL DESE-funded programs, actively participating in discussions and proposal reviews as the process requires, and better serving individuals with barriers to employment and who lack a high school diploma or need to learn English to succeed in the workforce. MassHire GBWB shares workforce and labor market information and helps make connections between local ABE/ESOL programs, MassHire Greater Brockton Career Center (MassHire GBCC), employers and workforce training programs to ensure local individuals enrolled in programs are supported and prepared for employment and additional opportunities for career pathways that reflect critical industries in our area. The Board continues working with DESE and local ABE/ESOL partners to better align adult education with industry needs in collaboration with WIOA partners and better serve job seekers by adopting coordinated service delivery across agencies “shared customers” - to be served in an integrated manner beginning with assessment and along career pathways until customers are employed in jobs that pay family-sustaining wages.

MassHire GBWB continues to identify opportunities to collaborate on, support and/or develop customized, demand driven programs that incorporate ABE/ESOL education in tandem with occupational training components – for example Integrated English Literacy and Civics Education (IELCE) for ESOL students. MassHire GBWB piloted a program with the Brockton Adult Learning Center and GBCC in 2018 to prepare local unemployed English language learners for employment in a healthcare career pathway. Individuals in the program became shared customers, and were simultaneously enrolled in their ESOL program classes as well as an eleven-week long work-readiness class called English for Employment at the Career Center followed by enrollment into the CNA/Home Health Aide training located at the MassHire GBWB and clinical at a local long-term care facility. Upon completion of the healthcare training, graduates met with local employers who were hiring at a Speed Networking Event and took the state test to attain the industry recognized certification for CNA. The partnering of industry, workforce, training and adult education partners is critical to preparing many individuals for the job openings across the Greater Brockton area and southeastern MA region in all industries. For example, in the upcoming year, we plan to continue working with ABE/ESOL partners to support and replicate this model in other critical industries, including developing an integrated Welding Program with one of our Vocational Technical Schools.

Both MassHire GBWB and MassHire GBCC serve on the Community Partnership for Adult Education (CPAE) which meets quarterly to share information & best practices, program openings and upcoming trainings and opportunities for interested individuals in local ABE/ESOL programs. In addition, the Board stays informed of and shares the needs of critical industries in our region and southeastern MA by developing partnerships with employers and industry groups, using local, state and national data sources, participating in the Regional Labor Market Blueprint activities and sharing.
information with education and training partners. The Board continues to seek collaborations with training and education partners focused on providing training for individuals entering the pipeline or upskilling in the region’s priority and critical industries - health care, professional scientific & technical, and finance & insurance services, manufacturing and construction. For example, MassHire GBWB released a Request for Qualifications (RFQ) in the fall of 2018 seeking qualifications from trainers interested in providing healthcare training to WIOA eligible individuals. The RFQ application and process included learning about the applicant trainer’s currently proposed program, cost and info of how funds would be spent, data collection practices and past performance outcomes, ability to serve and knowledge of the population the Career Center serves through WIOA, etc. MassHire GBWB hopes this process will attract and result in a varied list of interested, qualified trainers who will work closely with the Board to develop future training programs to continue to support, build skills and assist with industry-recognized credential attainment for local individuals while meeting the needs of employers. The Board plans to release another broader RFQ in 2019, again, to identify training partners who will collaborate and prepare more individuals, including those from ABE/ESOL local programs for employment in the priority and critical industries.

Our Career Center also has a long-standing history of working with adults with ABE and ESOL needs. The career center has partnered with Training Resources of America to provide outreach and English language assessment testing every Thursday at the Career Center. In addition, the English for Employment program has been jointly taught and facilitated by the Brockton Public Schools’ Adult Learning Center and the Career Center since 2000. The participants in this class generally come from Cape Verde, other countries in Africa, South America, Haiti and Asia. The program was created to help non-native English speakers develop the practical language skills needed to search for employment. Over the years, it has taught Brockton area adults how to prepare a compelling resume, interview confidently, and use the computer for job search opportunities. The 11-week course, which takes place three times each year, is open to non-native English speakers who are legally authorized to work in the United States and who are seeking new or better jobs. The curriculum includes: testing and evaluation, MS Word, resume writing, job applications, interviews, LinkedIn, cover letters, thank you notes, and telephone protocols. The program, which is free to eligible adults, is funded by the Massachusetts Department of Elementary and Secondary Education, the Brockton Public Schools, the Career Center and MassHireGBWB.

The Board also will continue to work with the other southeastern MA Workforce Boards to map available ABE/ESOL course offerings within the region and share relevant workforce reports, LMI, events and industry contacts.

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

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

Our local plan to increase collaboration with our existing partners is to continue our bi-monthly meetings and to expand upon our co-location. Staff will continue to cross train and participate in each organization’s staff meeting when appropriate. Continued communication between front line staff will enhance the knowledge of programmatic specifics in each partnering agency leading to more comfortable referral process.

The Greater Brockton Workforce Board consistently engages area service providers and is constantly reaching out to new providers in the area to assist in servicing our customer’s needs. The Board will continue to make this a priority going forward.

The Career Center, following MassHireGBWB’s leadership, is in on-going conversations with partners to establish operational procedures and an integrated customer flow. During FY 18 the details of MOU’s with WIOA mandated partners were completed. MassHireGBWB and existing partners established procedures for addressing the needs of job seekers. These partners include the following:

- Massachusetts Rehabilitation Commission (MRC)
- Department of Transitional Assistance (DTA)
- Department of Unemployment (DUA)
- Massachusetts Commission for the Blind (MCB)
- Senior Community Service Employment Program (SCEP)
- MassHire Greater Brockton YouthWorks
- Department of Elementary and Secondary Education (DESE)
- Department of Career Services (DCS)

Additionally, we engage other non-mandatory local partners including:

- Massasoit Community College
- Father Bill’s and Mainspring House
- Cape Verdean Association
- The Brockton Neighborhood Health Center

**Successful Partnership with the Department of Transitional Assistance**
The Career Center partnered with the Department of Transitional Assistance’s (DTA) Work Program Participant (WPP) staff to provide targeted job search assistance and support to WPP customers. The Career Center developed an intensified eight-week program consisting of customers meeting with our staff every Monday and Tuesday from 9:30-12:30. The first four weeks of the program consist of group job search readiness training and the final four focus on individual counseling and in some cases training. The Career Center staff attended orientation at the DTA office every Thursday to explain the services and recruit for the program. DTA Full Engagement Workers are also present one of the days to provide customer assistance. During FY 18 the Career Center provided services to 98 WPP customers. 38 were enrolled in the WIOA Title I Adult program with 24 finding employment at an average wage of $14.43 per/hr. We look forward to another successful program during FY 19.

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

The Fiscal agent for the region s the Brockton Area Workforce Investment Board, DBA MassHire Greater Brockton Workforce Board, located at 34 School St., Brockton, MA.

Please detail the competitive process that will be used to award the subgrants and contracts for WIOA title I activities.

Purpose: This Policy outlines the requirements for all procurements and contracts as it relates to the MassHire Greater Brockton Workforce Board.

Background: Federal, state and local governments have established standards for procurement and contracting to ensure that programs funded by the government obtain goods and services in the most cost effective manner. These standards also ensure open and fair competition for all prospective providers.

References: 2 CFR Part 200.317-200.326
   MGL Chapter 30B
   MGL Chapter 268A Massachusetts Conflict of Interest Law
   Sections 8301-8303 of Title 41 (Buy American Act) Environmental Protection Agency (EPA at 40 CFR Part 247) 6002 of the Solid Waste Act
   Federal Acquisition Regulation (FAR) at 48 CFR Subpart 2.1
   Wagner Peyser Act 29 U.S.C 49 et seq.

MassHire Greater Brockton Workforce Board will follow the same policies and procedures for all procurements. MassHire Greater Brockton Workforce Board will ensure that every purchase order or other contract includes any and all clauses required by Federal and state statutes and executive orders and their implementing regulations.

Procurement standards
(1) MassHire Greater Brockton Workforce Board will use its own procurement procedures, which reflect applicable State and local laws and regulations.
(2) MassHire Greater Brockton Workforce Board will maintain a contract administration system that ensures contractors perform in accordance with the terms, conditions, and specifications of their
contracts or purchase orders.

(3.) MassHire Greater Brockton Workforce Board’s code of standards of conduct governing the performance of their employees engaged in the award and administration of contracts is:

No employee, officer or agent of the grantee or sub-grantee shall participate in any way (including discussion, review and/or voting) in the selection, or in the award or administration of a contract supported by Federal or State funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when:

(i) The employee, officer or agent,

(ii) Any member of his immediate family,

(iii) His or her partner, or

(iv) An organization which employs, or is about to employ, any of the above, has a financial or other interest in the firm selected for award. The grantee’s or sub-grantee’s officers, employees or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to sub agreements. Grantee and sub-grantees may set minimum rules where the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value, based on the Commonwealth’s Ethics Rules. To the extent permitted by State or local law or regulations, such standards or conduct will provide for penalties, sanctions, or other disciplinary actions for violations of such standards by the grantees and sub-grantee’s officers, employees, or agents, or by contractors or their agents. The awarding agency may in regulation provide additional prohibitions relative to real, apparent, or potential conflicts of interest. In addition:

(v) A Board member or a Youth Council member must neither cast a vote on, nor participate in any decision-making capacity, on the provision of services by such member (or any organization which that member directly represents), nor on any matter which would provide any direct financial benefit to that member or a member of his/her immediate family.

(vi) Neither membership on the Board, or the Youth Council, nor the receipt of WIOA funds to provide training and related services, by itself, violates these conflict of interest provisions.

(4.) MassHire Greater Brockton Workforce Board will review proposed procurements to avoid purchase of unnecessary or duplicative items. Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

(5.) To foster greater economy and efficiency, MassHire Greater Brockton Workforce Board will enter into State and local inter-governmental agreements for procurement or use of common goods and services.

(6.) MassHire Greater Brockton Workforce Board will require the use of value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

(7.) MassHire Greater Brockton Workforce Board will make awards only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

(8.) MassHire Greater Brockton Workforce Board will maintain records sufficient to detail the significant history of procurement. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

(9.) MassHire Greater Brockton Workforce Board will use time and material type contracts only:
(i) After a determination that no other contract is suitable, and  
(ii) If the contract includes a ceiling price that the contractor exceeds at its own risk.

(10.) MassHire Greater Brockton Workforce Board alone will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the grantee or sub-grantee of any contractual responsibilities under its contracts. Violations of law will be referred to the local, State, or Federal authority having proper jurisdiction.

(11.) MassHire Greater Brockton Workforce Board will have protest procedures to handle and resolve disputes relating to their procurements and shall in all instances disclose information regarding the protest to the awarding agency. A proctor must exhaust all administrative remedies with the grantee and sub-grantee before pursuing a protest with the state or Federal agency. Reviews of protests by the Federal agency will be limited to:

(i) Violations of Federal law or regulations and the standards of 29CFR Part 95 or 97 (violations of State or local law will be under the jurisdiction of State or local authorities) and 
(ii) Violations of the grantee's or sub-grantee's protest procedures for failure to review a complaint or protest. Protests received by the Federal agency other than those specified above will be referred to the grantee or sub-grantee.

Competition

MassHire Greater Brockton Workforce Board will promote and maximize the competitive procurement process. At a minimum, the procurement process will:

a. appropriately target resources based on approved job training plans;
b. be made impartially and at "arms length";
c. be based upon demonstrated performance
d. include a determination of cost/price reasonableness;
e. be in compliance with all related federal and state laws, regulations and policy

(1.) All procurement transactions will be conducted in a manner providing full and open competition consistent with the standards of &200.319. Some of the situations considered to be restrictive of competition include but are not limited to:

(i) Placing unreasonable requirements on firms for them to qualify to do business,
(ii.) Requiring unnecessary experience and excessive bonding,
(iii.) Noncompetitive pricing practices between firms or between affiliated companies, (iv.) Noncompetitive awards to consultants that are on retainer contracts,
(v.) Organizational conflicts of interest,
(vi.) Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance of other relevant requirements of the procurement, and
(vii.) Any arbitrary action in the procurement process.

(2.) MassHire Greater Brockton Workforce Board will conduct procurements in a manner that prohibits the use of statutorily or administratively imposed in-State or local geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal and state statutes expressly mandate or encourage geographic preference.

(3.) MassHire Greater Brockton Workforce Board will have written selection procedures for procurement transactions. These procedures will ensure that all formal solicitations:

(i) Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The description may
include a statement of the qualitative nature of the material, product or service to be procured, and when necessary, shall set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equal" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offerors shall be clearly stated; and

(ii) Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

(4.) MassHire Greater Brockton Workforce Board will ensure that all pre-qualified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, MassHire Greater Brockton Workforce Board will not preclude potential bidders from qualifying during the solicitation period.

Methods of procurement to be followed—
The method of procurement to be followed is dependent on:

Threshold Level

a. Goods and services less than $3,500 (Micro-purchase)

For Procurements within this threshold, small purchase procedures must be used. BAWIB requires documentation of the price analysis, procurement method and justification for the selection among competitive providers. This may include a pre-qualified service provider inventory list (see RFQ selection process for further requirements). Care should be exercised in establishing specificity in agreements to ensure that outcome goals are achieved.

b. Goods and services from $3,501 to $150,000 (Small purchase)

Procurements within this threshold do not require a formal bid solicitation process, however, bids and/or proposals must be documented from at least three (3) qualified providers. BAWIB’s written procedures must outline/specify the method of procurement, and must ensure documentation of the best price selection and award justification of competitive providers based on full cost/price analysis.

c. Goods and Services over $150,000 (Simple Acquisition Threshold)

Procurements at this threshold level are subject to formal bid/proposal solicitation requirements.

Competitive Procurement

Procurement transactions will be conducted to ensure adequate competition and reasonable price. Non-competitive procurement should be used only in the circumstances outlined below.

(1) Procurement by small purchase procedures. Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than $150,000. If small purchase procedures are used, price or rate quotations shall be obtained from an adequate number of qualified sources.

(2) Procurement by sealed bids (formal advertising). Bids are publicly solicited and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the conditions in paragraph (i) of this section apply.

(i) In order for sealed bidding to be feasible, the following conditions should be present:

(A) A complete, adequate, and realistic specification or purchase description is available;
(B) Two or more responsible bidders are willing and able to compete effectively and for the
business; and

(C) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

(ii) If sealed bids are used, the following requirements apply:

(A) The invitation for bids will be publicly advertised and bids shall be solicited from an adequate number of known suppliers, providing them sufficient time prior to the date set for opening the bids;

(B) The invitation for bids, which will include any specifications and pertinent attachments, shall define the items or services in order for the bidder to properly respond;

(C) All bids will be publicly opened at the time and place prescribed in the invitation for bids;

(D) A firm fixed-price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of;

(E) Any or all bids may be rejected if there is sound documented reason.

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

(i) Requests for proposals will be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals shall be honored to the maximum extent practical;

(ii) Proposals will be solicited from an adequate number of qualified sources;

(iii) Grantees and subgrantees will have a method for conducting technical evaluations of the proposals received and for selecting awardees;

(iv) Awards will be made to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and

(v) Grantees and subgrantees may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

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

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

Non-Competitive Procurement

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

(1.) Procurement by noncompetitive proposals may be used only when the award of a contract is infeasible under small purchase procedures, sealed bids or competitive proposals and one of the following circumstances applies: The item is available only from a single source; The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation; The awarding agency authorizes noncompetitive proposals; or After solicitation of a number of sources, competition is determined inadequate, or failed competition, where the solicitation has resulted in fewer than two responsive and responsible bids.

(2.) Cost analysis, i.e., verifying the proposed cost data, the projections of the data, and the evaluation of the specific elements of costs and profits, is required. When BAWIB conducts a formal solicitation process and receives only one qualified proposal, the award process must be justified and documented. A Failed Competition Analysis must be performed.

**Failed Competition Analysis**

BAWIB will address the following questions:

(1.) Was there a weakness in the solicitation specifications?
   a. Was the statement of work clear?
   b. Was the statement of work too narrowly defined?
   c. Were the administrative requirements too cumbersome?
   d. Was there an excessive amount of experience required?
   e. Was the cost the entity was willing to pay too low?
   f. Was there adequate time to prepare proposals?

(2.) Was the solicitation advertised in an adequate number of locations?

(3.) Are the services/training being sought really only available from one offeror?

Once MassHire Greater Brockton Workforce Board has addressed these issues and documented that the process was not flawed and that in fact only one vendor can provide the services being sought, a cost/price benefit analysis must be completed prior to awarding the contract.

Prior written approval of the Executive Director must be obtained for any sole source or emergency/exigency award. All such awards must be justified and documented. Requests for approval must include the following information:

1. copy of the offerors proposal
2. copy of the cost/price analysis
3. copy of related BAWIB meeting discussion minutes
4. copy of the non-competitive/award justification
5. cover letter requesting approval
6. failed competition analysis

**Such awards will not be approved retroactively.**

All such awards greater than $150,000 must be approved, in writing, by the funding agency prior to the award. Such procurements which initially do not require funding source approval, but which are to be modified to an amount which exceeds $150,000, must be submitted for funding source approval, prior to the execution of the modification. Failure to obtain required prior approvals may result in questioned costs.

**Frequency of Solicitations**

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

**Authority to Take Procurement Actions**
The Executive Director shall have the sole authority to take all and any Procurement Actions. Said Procurement actions shall be based upon a Budget approved by the Board of Directors of BAWIB. The Assistant Director shall have the same authority to take procurement actions only when approved by the Executive Director.
1. Allocate funds to procure services
2. Approve procurement plans
3. Approve non-competitive and sole-source procurements
4. Approve the issuance of the solicitation package
5. Approve the selection of contractors or service providers
6. Sign contracts (The policy must include appropriate certification by the municipality or Board of Directors that this individual has legal authority to sign contracts and must be consistent with the signatory on file with the Commonwealth.)
7. Approve and sign contract modifications
8. Issue notices of contract termination

Where individuals in MassHire Greater Brockton Workforce Board, the municipality, and Program Operator administrative entity have joint responsibility to approve contract actions, the procurement policy must delineate and describe respective roles and authority. Authorization should be reviewed on an annual basis and revised, if necessary.

**Procurement Documentation**
BAWIB shall require the maintenance of organized and centralized procurement files. All files must contain sufficient documentation to track the significant history of each procurement. Files shall contain all documentation related to that procurement including, but not limited to: procurement planning records, the solicitation, notices of public advertisement, bidders conference minutes, all proposals submitted with records of their receipt, all proposal evaluation documentation (including sign-off and certifications), all proposal negotiation documentation, and all related meeting/committee minutes to document the contract(s) review, evaluation and award.

**Federal Awarding Agency or DCS Review**
a) The grantee must make available, upon request of the Federal awarding agency or DCS, technical specifications on proposed procurements where the Federal awarding agency or pass-through entity believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition. This review generally will take place prior to the time the specification is incorporated into a solicitation document. However, if the grantee desires to have the review accomplished after a solicitation has been developed, the Federal awarding agency or DCS may still review the specifications, with such review usually limited to the technical aspects of the proposed purchase.
b) The grantee must make available upon request, for the Federal awarding agency or DCS pre-procurement review, procurement documents, such as requests for proposals or invitations for bids, or independent cost estimates, when:
   1) The grantee’s procurement procedures or operation fails to comply with the procurement standards in this part;
   2) The procurement is expected to exceed the Simplified Acquisition Threshold and is to be
awarded without competition or only one bid or offer is received in response to a solicitation;

3) The procurement, which is expected to exceed the Simplified Acquisition threshold specifies a “brand name” product;

4) The proposed contract is more than the Simplified Acquisition Threshold and is to be awarded to other than the apparent low bidder under a sealed bid procurement; or

5) A proposed contract modification changes the scope of a contract or increases the contract amount by more than the Simplified Acquisition Threshold.

c) The grantee is exempt from the pre-procurement review in paragraph (b) of this section if the Federal awarding agency or DCS determines that its procurement systems comply with the standards of this part.

1) The grantee may request that its procurement system be reviewed by the Federal awarding agency or DCS to determine whether its system meets these standards in order for its system to be certified. Generally, these reviews must occur where there is continuous high-dollar funding, and third party contracts are awarded on a regular basis.

2) The grantee may self-certify its procurement system. Such self-certification must not limit the Federal awarding agency’s right to survey the system. Under a self-certification procedure, the Federal awarding agency may rely on written assurances from the grantee that it is complying with these standards. The grantee must cite specific policies, procedures, regulations or standards as being in compliance with these requirements and have its system available for review.

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

The Board, through the Workforce Systems Committee, manages performance for the region on a monthly basis. The table below represents activity as of November 30, 2018.
What are the actions and activities that support the local boards continued status as a high-performance workforce board?

a). What trainings are applicable to Board members?
All new Board members meet individually with the Executive Director of MassHire GBWB and/or Chair for a new member orientation. This meeting covers all information relevant to being a Board member, including WIOA and other funding sources supporting the Greater Brockton workforce system; the Board’s mission, vision, strategic plan, and governance structure including committees; current programs, trainings, publications and initiatives. New board members receive an orientation powerpoint presentation and are given time to review the information and committee descriptions and meeting schedules and must participate as an active member on at least one of the committees.

b). How do business Board members contribute to workforce development in your region?
Our Board members contribute to the workforce activities by serving as guest speakers within sector strategies, Ambassadors to the region, participating on regional planning and providing on the ground data related to their industry. Members also promote the Career Center activities by posting employment opportunities and engaging with networks within the system.

c). How does your Board support the business services in the career centers?
The Board members actively engage with the business services staff at the Career Center. Board Members meet with BSR staff to discuss their specific businesses, industry and assist staff by making introductions and sharing contacts. In addition, MassHire GBWB provides opportunities for the Career Center Business Services Manager to engage with Board members though participation on the Business & industry Committee and attending monthly meetings.

d). To what extent does inter-/intra-Board collaboration result in positive outcomes for job-seekers and businesses?
The active involvement of the Board members with the workforce system activities and local partners engaged in the system has been critical in meeting the needs of job seekers and businesses. Board members and staff aim to recruit members who bring expertise and insight that can move the work in a positive direction. Board members have shown a great willingness to collaborate with stakeholders across the local and regional workforce system as well as with each other, which has resulted in many positive outcomes for employers and individuals across the region. Board members encourage each other to get/stay involved by developing and/or earning about the programs and assisting with job placement, internship opportunities, etc for job seekers to fill positions open at their businesses. Sharing information amongst the Board members occurs regularly and the Board staff help make connections between members as appropriate.

How will training services outlined in WIOA sec. 134 be provided through the use of individual training accounts, including, if contracts for training services will be used, how the use of such contracts will be coordinated with the use of individual training accounts under that chapter, and how your Board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided.

Using Federal funds called Individual Training Accounts (ITAs), A small percentage of job seekers
request individualized career services through a Career Specialist, and these job seekers comprise the Adult and Dislocated Worker groups of the Title I of WIOA. The Career Center trains a portion of the Adult and Dislocated Worker population to make them more employable. ITAs are available to job seekers who are in need of training to acquire new skills and an industry-required certificate to secure employment. CareerWorks staff assist job seekers in researching the best training option, the one which will provide an individualized opportunity for self-sufficiency and sustainable employment. The Career Center is able to provide these job seekers with the following services:

- Comprehensive assessments, development of an individual employment plan,
- Group and individual counseling,
- Career planning,
- Short-term pre-vocational services including development of learning skills,
- Communication skills,
- Interviewing skills,
- Workforce preparation activities,
- Financial literacy services,
- English language acquisition,
- Integrated education and training programs.

The following chart shows the ITAs selected this past year by occupation. The data indicates a strong diversity of training occupations across all of the industries with which the Career Center is involved.

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

a. On-the-Job Training, including use of the Commonwealth’s waiver to provide up to 90% employee wage reimbursement to businesses with fewer than 50 employees

MassHire GBWB has an executed Master Agreement with MassHire Hampden County Workforce Board for the statewide Workforce Training Fund Program- On the Job Training (WTFP-OJT). MNWB and Career Center staff are informed and aware of this program and it is included as one of many “tools” in the employer engagement tool box when staff engage employers.
b. Apprenticeship
MassHire GBWB held meetings with the state’s Division of Apprentice Standard to educate staff and also stay up-to-date on apprenticeship developments. The Board and Career Center staff also met with the Northeast Advanced Manufacturing Consortium who was already involved with a car manufacturer located closer to our geographic area interested in offering apprenticeships. We will continue to collaborate, share information and promote apprenticeships with individuals, youth, and employers.

c. Incumbent Worker Training
MassHire GBWB supports customized incumbent worker training in regional priority sectors including training in welding and manufacturing with strong participation from employers in the Southeastern MA Advanced Manufacturing Consortium. As mentioned earlier, the Board shares information with individuals, employers, community partners and workforce system partners across southeastern MA on current and future incumbent worker training opportunities and holds events around the region promoting resources to develop and/or access incumbent worker training programs such as the Workforce Training Fund. We will continue to promote and develop incumbent worker training programs that meet the needs of local employers.

d. Work Experiences (paid or unpaid)
MassHire GBWB supports paid/unpaid work experiences consistently through its youth programs. Paid work experiences such as the subsidized summer jobs via YouthWorks and unpaid experiences such as some of the placements in the Connecting Activities program are both vital to youth developing workforce skills and gaining an awareness of key industries prominent in the Greater Brockton area and across southeastern MA.

e. Transitional jobs (§ 680.190 – one that provides a time-limited work experience, that is wage-paid and subsidized, and is in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history, as determined by the Local Board. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment).

f. Online remediation tools (such as WorkKeys Curriculum) for OJT/apprenticeship screening in support of cultivating and demonstrating workplace competencies.

i. Does the local area utilize the National Career Readiness Curriculum (NCRC) to measure job-seekers work ethic and discipline, basic skills abilities, and job-ready qualifications?

Masshire GB YouthWorks and CareerWorks primarily use the Career Ready 101 tool for testing and remediation.

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

a). make available copies of a proposed local plan to the public through electronic and other means, such as public hearings and local news media; b). allow members of the public to submit comments, not later than the end of the 30-day period beginning on the date on which the proposed local plan is made available; c). include with the local plan submitted to the Governor any such comments that represent disagreement with the plan.

MassHire GBWB is posting the draft local plan electronically on its website, distributing via email, and posting hard copies on site. The distribution lists include Board members, committee members, employers, all members of the Southeast Regional Planning Team, training and education providers, economic development agencies, local government officials & legislators, and other community partners. The Executive Director will also be presenting the plan in full at the Old Colony Planning Council Comprehensive Economic Development Strategy Committee. The draft local plan will be posted for 30 days and any comments that represent disagreement with the plan will be recorded and included in the submission to the Governor.

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

The MassHire GBWB Director of Operations and required partners with shared customers (on the local MOU) have been discussing the intake and case management system for shared customers across agencies. Currently, the Career Center utilizes the MOSES system to track and document all intake and case management services. The group will continue discussing how to best implement and build on a process for shared customers which includes the use of technology and other means.

The first potential barrier to receiving services is the access point at which a customer may become a Career Center member. Under the One-Stop system, a customer must become a member before receiving services at the Career Center. The Career Center has adopted an entirely paperless online system for becoming a member. For those customers who wish to register on their own, they may do so online using the technology tools of their choice. For those who are working with partnering agencies, they may apply & become members at the partnering agencies location.

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

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

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

MassHire GBWB follows state guidance related to Priority of Service for adult career and training
services for recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. This is included in the One-Stop Career Center Charter and annual fiscal contracts with the Career Center Operator.

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

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

Workforce Issuance

**Service Priority for Individualized Career Services & Training Services WIOA Priority Group**

The Brockton SDA is compliant with WIOA sec. 134(c)(3)(E) that states that individualized career services and training services funded with Title I Adult Program funds must be given on a priority basis, regardless of funding levels, to:

- Recipients of public assistance
- Other low income individuals (in accordance with Federal Poverty Guidelines and Lower Living Level Standard Income Levels)
- Individuals who are basic skills deficient

The priority of service for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient is a statutory priority that applies only to the receipt of individualized career services and training services in the WIOA Title I Adult program.

**Veterans Priority of Service**

Veterans under WIOA sec. 3(63)(A) and 38 U.S.C. 101 receive priority of service in all Department of Labor-funded training programs under 38 U.S.C. 4215 and described in 20 CFR 1010. A Veteran must still meet each program’s eligibility criteria to receive services under the respective employment and training program.

**Documentation of Priority Status**

The *Eligibility Requirements for WIOA Title I Adult and Dislocated Workers* for eligibility and source documentation requirements related to enrollment in individualized career services and training services under the WIOA Title I Adult and Dislocated Worker program will be observed.

**Priority Ordering**

WIOA sec. 134(c)(3)(E) establishes an order in which individuals identified in the WIOA priority group receive services.

Priority of service means that individuals in the targeted groups are given priority over other individuals for receipt of individualized career services and training services funded by the Title I Adult program. Veterans within these groups receive priority over non-Veterans.

Priority for individual career and training services must be provided in the following order:

1. Veterans and eligible spouses who are recipients of public assistance, low-income, or basic skills deficient.
2. Individuals who are recipients of public assistance, low-income, or basic skills deficient.
3. Veterans and eligible spouses who are not recipients of public assistance, low-income, or basic skills deficient.
4. Individuals included in the Local Workforce Board defined priority group.
5. Individuals outside the WIOA priority group and the board’s locally defined Adult Program priority group.

Priority of service status is established at the time of eligibility determination and does not change during the period of participation. With the exception of Veterans and eligible spouses, priority of service status does not apply to the Dislocated Worker or Youth populations.

WIOA removes the provision stating priority of service is only applied when funding is limited. Priority of service must be implemented regardless of the amount of funds available to provide services in the local area.

WIOA sec. 134 (c)(3)(E)
WIOA Final Rules: 20 CFR §680.600
Training and Employment Guidance Letter (TEGL) No. 19-16: Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Services (ES), as amended by Title III of WIOA. And for Implementation of the WIOA Final Rules
Mass Workforce Issuance 100 DCS 15.100: Veterans Priority of Service

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

(c) Your local plan must include any additional information required by the Governor.
No additional information has been requested at this time.

(d) Your local plan must identify the portions that the Governor has designated as appropriate for common response in the regional plan where there is a shared regional responsibility, as permitted by § 679.540(b): The Governor may issue regional planning guidance that allows Local Boards and chief elected officials in a planning region to address any local plan requirements through the regional plan where there is a shared regional responsibility. Incorporate anything from your Regional Plan content as appropriate.

This local plan includes information from the Regional Plan (Southeastern MA Labor Market Blueprint) as appropriate.

a) Comments submitted during the public comment period that represent disagreement with the plan are required to be included with your local plan.
Such comments will be incorporated.
## ATTACHMENTS

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