



UPWARD TALENT COUNCIL

WIOA FOUR-YEAR COMBINED PLAN PROGRAM YEARS 2016-2019

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UPWARD Talent Council Regional Plan

Regional Planning Process

The regional plan was created by UPWARD Talent Council (UPWARD) based on current relationships and collaborations. All plans – regional and local are shared with community stakeholders for their comments, suggestions, etc. through our website (upmichiganworks.org) and established relationships, primarily UPWARD’s board and advisory board members. Our Local Elected Official, Workforce Development Board, and Career Educational Advisory Council (CEAC) are comprised of local elected officials, employers, education partners, labor organizations and other community partners may review, comment and approve the plan, and any subsequent modifications. Additionally, other community partners and members of the public may comment through an open comment period of a minimum of 30-days. The review and comment process will be followed in the event of future modifications and any comments that represent disagreement with future modification of our plans will be forwarded to the Talent Investment Agency (TIA).

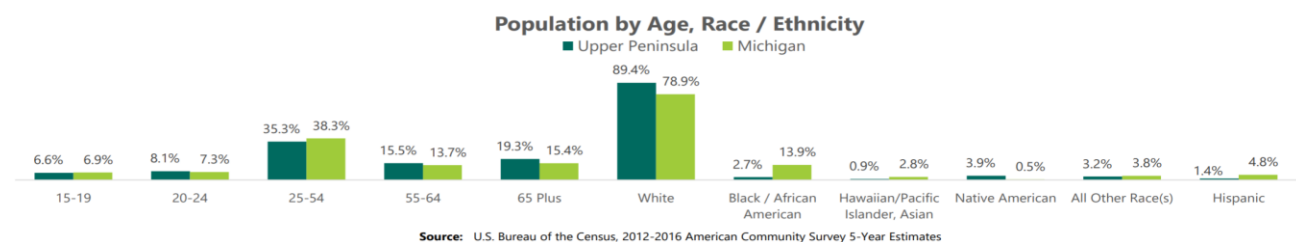
Regional Labor Market Data and Economic Conditions

Below is an analysis of regional labor market data and economic conditions. This analysis includes existing in-demand industry sectors and occupations, the employment needs of employers in those sections, as well as labor market data, trends, educational levels and more.

Population Information

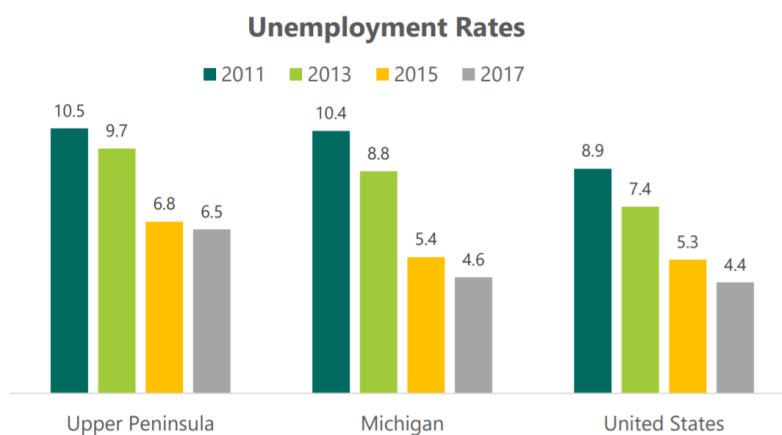
The population of the Upper Peninsula of Michigan, consisting of 15 counties, is 302,100 according to the latest estimates from the U.S. Census Bureau. The population has declined from 310,900 in 2011; losing about 3,000 residents in just the past two years (2015-2017). All 15 counties of the Upper Peninsula lost population, ranging from a loss of 70 in Keweenaw to a drop of 1,150 in Chippewa county.

Most of the population loss in the Upper Peninsula continues to be attributed to domestic out-migration to other areas of the state. In addition to the decline in population, it is important to note that the population of the Upper Peninsula is older than the state’s population, on average and less diverse. The ramifications of the changing in demographics means that our region is struggling with talent attraction and retention of a younger, diverse population. The chart below shows the population by age, race, and ethnicity cohorts.



Labor Market Information

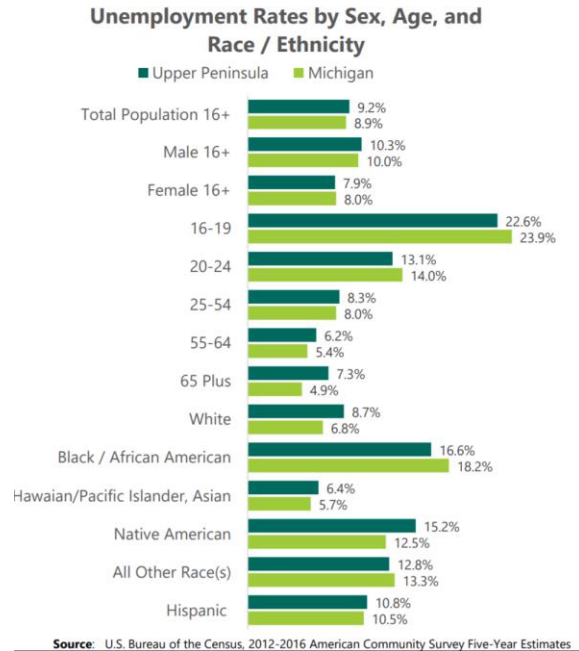
The unemployment rate in 2017 for the Upper Peninsula region was 6.5%. This rate is above the state's rate of 4.6% and the national rate of 4.4%. The counties within the region range from a low of 4.9% in to high of 10.2 % in Mackinac (Source: Bureau of Labor Statistics). The trend over time, however is consistent with both state and national decreases since 2011.



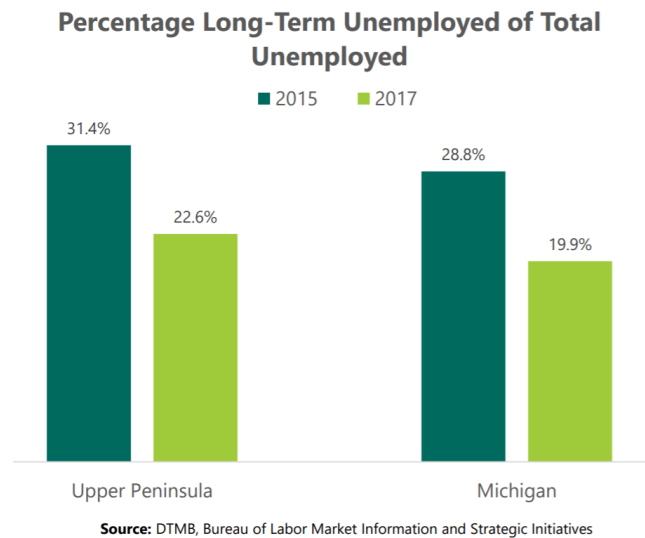
Source: DTMB, Bureau of Labor Market Information and Strategic Initiatives, Local Area Unemployment Statistics (LAUS)

The unemployment rates of youth and young adults (16-24 years old) are typically higher than for any other groups in both the U.P. and the state for reasons such as less experience, lower education, etc. Coupled with the older population, the high unemployment rates of youth in the area in the region reflects employers struggling to find qualified candidates in the region.

It is important to analyze detailed unemployment demographics to gain a better understanding of the workforce in the Upper Peninsula. Jobless rates in the U.P. are higher for males, youths and almost all racial and ethnic groups, except for Blacks and All Other Races (Two or more Races and Other Races)).



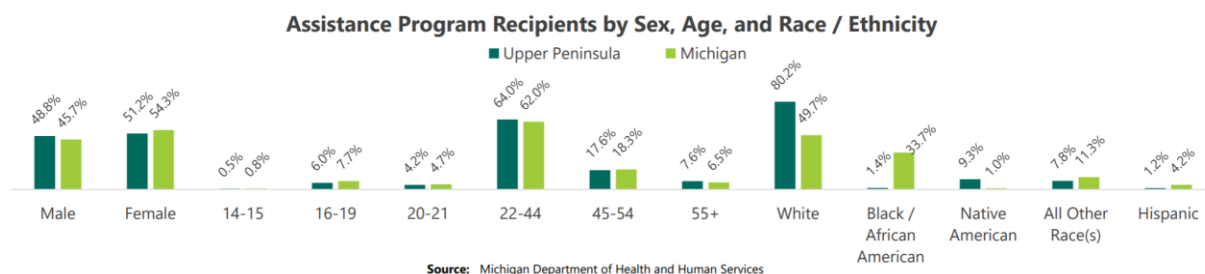
During the recession, long-term unemployment was high. The number of long-term unemployed individuals, or the share of individuals out of work for 27 weeks or more, has made a significant recovery dropping from 44% of unemployed residents of the U.P. in 2010 to 31% in 2018 and 29% in 2017. The decline in long-term unemployment has been slower in the Upper Peninsula than statewide.



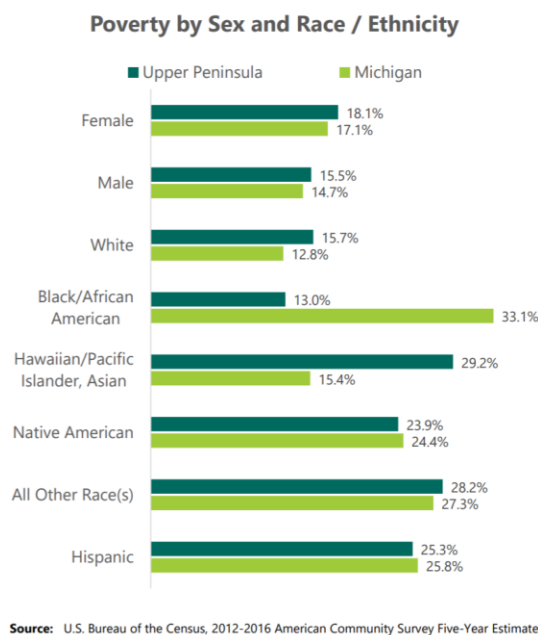
The U.P. has a higher share of females and whites with a disability than statewide. According to the U.S. Census Bureau, about 48,300 people in the U.P. reported a disability during the 2012-2016 period. Over half of them were females the U.P. About 42% of them were 65 years of age

and older; four percentage points higher than the state average. Native Americans display a higher share of the population in the U.P. than statewide. Consequently, this group also show a higher percentage of individuals with a disability (4.2%, compared to the state's 0.8%).

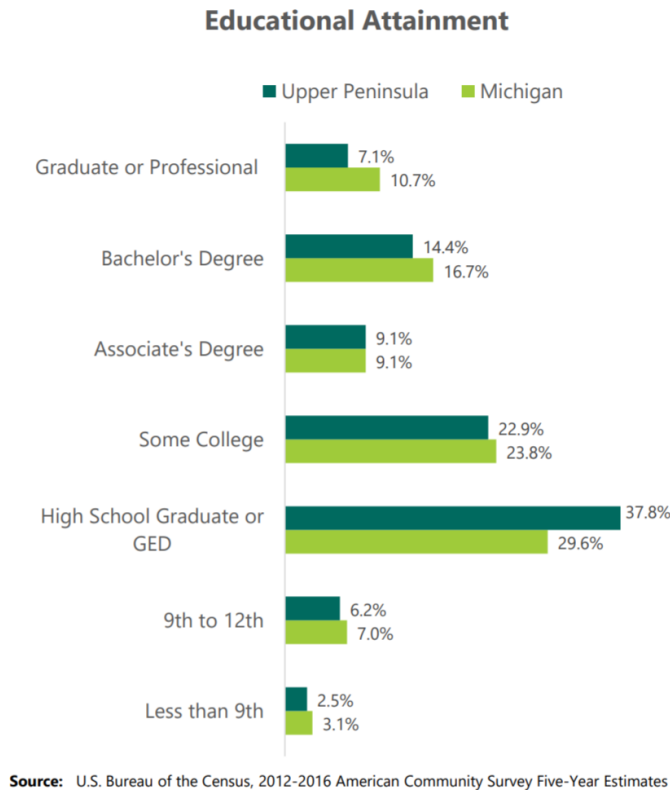
The Michigan Department of Health and Human Services counted roughly 13,600 assistant program recipients in the U.P. in December of 2015. In June 2017, the number has dropped to 10,900 in the region. Regional assistance program recipients remain concentrated in the working age and white demographics. The majority of the registrants were in the prime working age of 22 to 44 (about 64%). Approximately 80% of the registrants were White, compared to only 50% statewide. Native Americans were nine times more likely to be on assistance in the U.P. than they were statewide, reflecting the higher-than-average share of this group in the regional population.



The poverty rate in the Upper Peninsula hovered at 17% in 2017; slightly above than statewide rate. Individuals identifying themselves as Asians, Hawaiian or Pacific Islanders had the highest poverty rate in the U.P. at 29%, almost double the poverty rate of this group statewide. The share of Whites in poverty in the U.P. is also noticeably higher than the statewide rate.

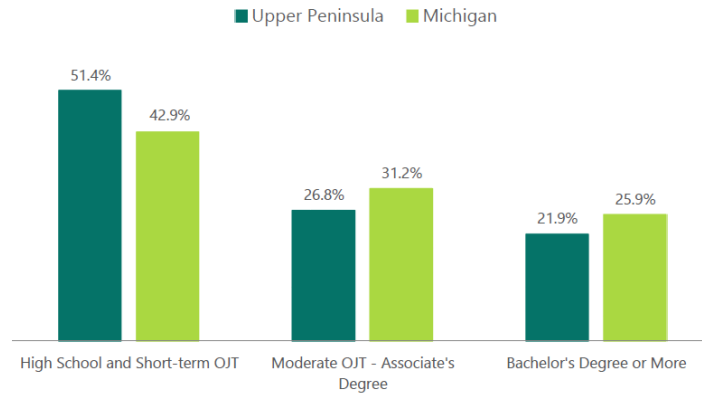


The skills and abilities of the region's workforce are indicated by several factors, one of which is educational attainment. The educational attainment of the Upper Peninsula's residents continues to be below statewide averages. The U.P. still shows lower proportions of individuals with a bachelor's degree or higher (22%) than statewide (27%). The shares of residents with some college but no degree or an associate degree continue to be almost the same in both areas (the U.P. and the state).



Currently, and projected in 2024, 51% of Upper Peninsula jobs will need only a high school diploma or less, with short-term to no on-the-job training. Compare this to 43% statewide. These occupations have a large employment base and will create positions through the need to replace workers. Close to 27% will require an associate's degree, post-secondary training, some college with no degree, or a high school diploma or less along with an extended period of apprenticeship and/or on-the-job training from 2014 through 2024. Positions requiring a bachelor's degree or more will make up a lower share of total employment in the Upper Peninsula compared statewide in 2024 at 22%.

Projected 2024 Occupational Employment by Education (Share of Total)



Source: Bureau of Labor Market Information and Strategic Initiatives

The top job advertisements posted online require a high school diploma, some vocational training, or an associate's degree. Job advertisements in the Upper Peninsula are led by Healthcare occupations (four of the top ten). Employers post many ads for in-demand positions like Registered nurses, Medical Assistants, and Heavy Tractor-Trailer Truck Drivers.

Online job postings reach 1,500 in 2nd quarter 2017.

Online Advertised Job Postings – Upper Peninsula	
Job Title	Number
Registered Nurses	225
Heavy and Tractor-Trailer Truck Drivers	102
First-Line Supervisors of Retail Sales Workers	88
Licensed Practical and Licensed Vocational Nurses	71
Retail Salespersons	62
Medical and Health Services Managers	55
Demonstrators and Product Promoters	48
Medical Assistants	48
Customer Service Representatives	45
First-Line Supervisors of Food Preparation and Ser	42

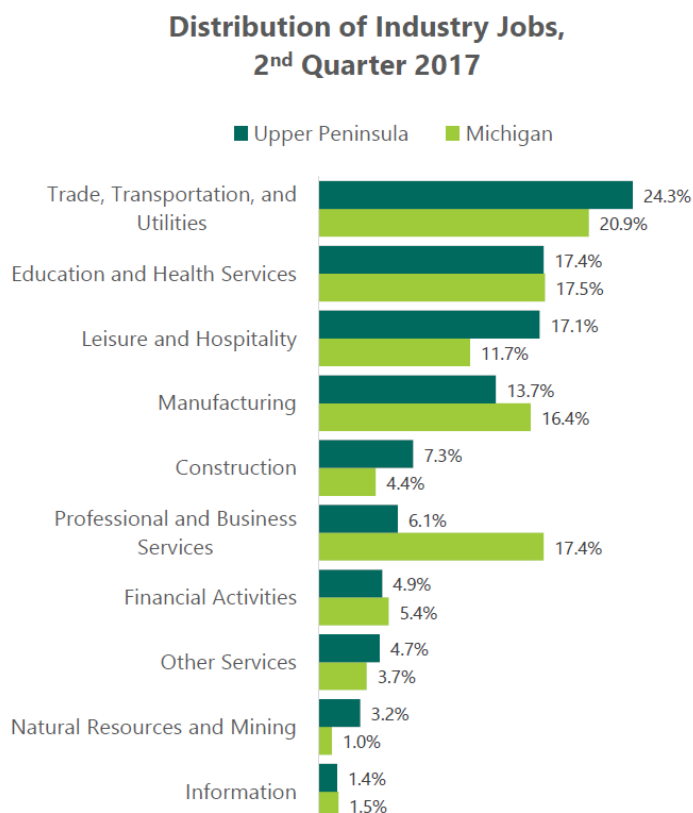
Source: The Conference Board, Help Wanted Online Database

Available Education and Training Opportunities

All WIOA funded classroom education and training opportunities are available on the Michigan Training Connect website, <https://www.mitalent.org/mitc>. We are striving to develop stronger relationships with education providers in the area to help them understand the benefits of the Michigan Training Connect website. With the limited providers in our local area, it is essential that all education providers are on the site to provide a variety of training options for job seekers in the U.P.

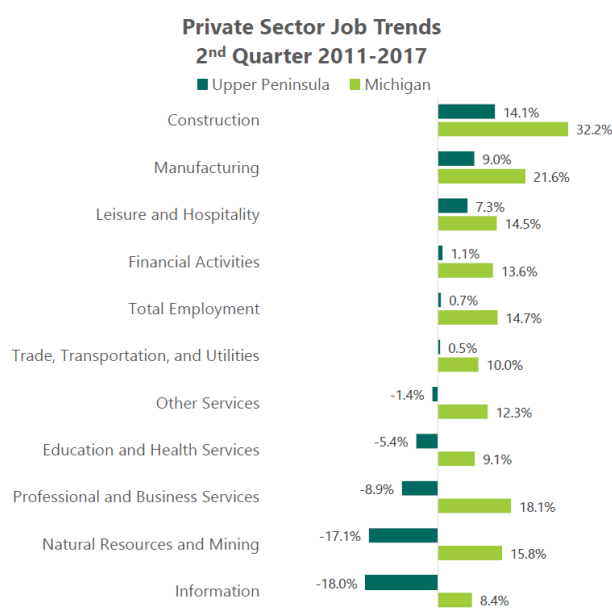
UPWARD Talent Council provides work-based training for eligible participants in the local area. Often times, accompanied with formal education to obtain an industry recognized credential.

The current order of regional industries based on their share in total private payroll jobs has remained consistent compared to two years ago. The 2nd quarter of 2017 had the top distribution of industry jobs in the Upper Peninsula as: Trade, Transportation, and Utilities (the largest private industry) followed by Education and Health Services, and Leisure and Hospitality. Almost 60 percent of employment in the Upper Peninsula are concentrated in these top three industries.



Only half of Upper Peninsula's industries recorded positive job growth over the 2011-2017 period. Private sector jobs in the region remained almost unchanged since 2011, increasing by 600 or

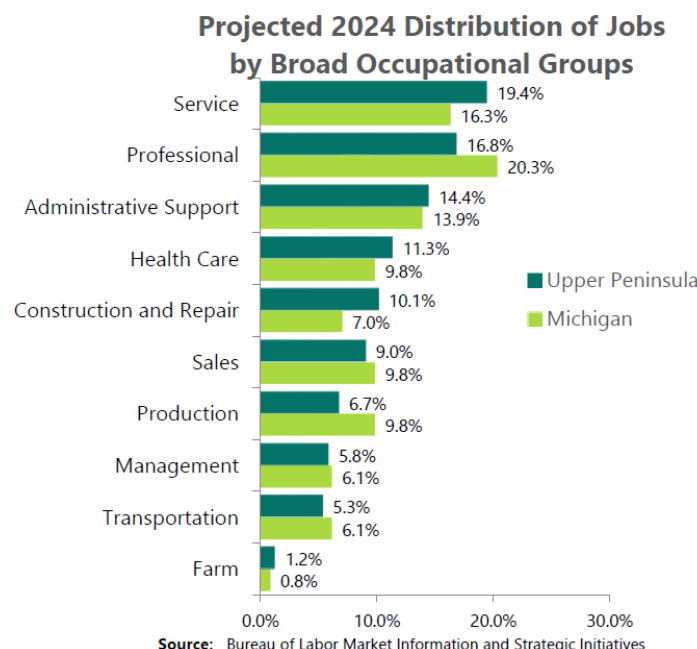
seven tenths of a percent. Compared statewide, private payroll employment grew by 480,500 or 15 percent during this time frame. Construction recorded the largest job expansion, followed by Manufacturing, Leisure and hospitality, Financial activities, and Trade, transportation, and utilities (source: DTMB). The remaining industry groups recorded employment reductions totaling approximately 1,200. Jobs lost in Natural resources and mining industry is due mainly as the result of the closure of an iron ore mine in 2016.



Approximately half of the Upper Peninsula jobs are estimated to be in three job groups of Service, Professional, and Administrative support by 2024. Occupational employment in the region is projected with minimal growth of one percent (+1,300) between 2014 and 2024. Compared to the Statewide growth of 7 percent.

Service occupations continue to be the largest occupational category (19%) for projected total jobs by 2024. This group includes occupations in Protective services, Food preparation and service, Building and grounds cleaning and maintenance, and Personal care services.

Professional continues to be the second largest occupation group (16.8%) of total jobs in 2024. This includes Business, Computer, Technical, Science, Social service, and Education positions. Administrative support is also estimated to remain the third largest in the region with 14% of total jobs by 2024. This category includes positions like Bookkeeping, accounting, and auditing clerks, Billing and posting clerks, and Secretaries and administrative assistants. The group of Healthcare services is the fourth largest employer at 11% of employment in 2024. Many health careers in the Upper Peninsula are estimated to show strong growth just like in nation and statewide.



In-demand Industry Sectors and Occupations Knowledge and Skills

The UPWARD Talent Council follows the Regional Hot Jobs list for the Upper Peninsula of Michigan to determine employment needs in growing industries in the U.P. The attached Hot Jobs for the Upper Peninsula highlights occupations that show a favorable mix of long-term job growth, projected annual job openings and median wages through 2024 and is available on the Michigan Bureau of Labor Market Information and Strategic Initiatives website, milimi.org. UPWARD Talent Council's boards annually review the Regional Hot Jobs to develop and implement plans for the regional in-demand sectors and/or occupations.

Regional Hot Jobs for the Upper Peninsula is included as Attachment 1.

Regional Service Strategies

The UPWARD Talent Council Michigan Works! has developed and continues to grow its demand driven system through evaluation, implementing best practices through effective communication and data sharing that effectively meets the needs of job seekers and employers in Region 1. Uniquely, our region and local area served are identical – both the entire Upper Peninsula of Michigan. As outlined below, many of the strategies will be expanded and streamlined throughout the life of this plan to prioritize regional planning efforts.

Streamline Employer Services

UPWARD Talent Council uses the Business Services Professional model to engage employers in the region. Focusing on employer engaged solutions, employer specialists regularly collaborate with community stakeholders to meet the needs of job seekers and employers. The work of these

teams throughout the region will continue to be integrated and streamlined with partner services, such as economic development organizations to break down silos administering WIOA services in the area.

Employer staff are certified Business Solutions Professionals that leverage partnerships between business, workforce development, educators and economic developers to help businesses in the region be successful and to meet their demands for a skilled workforce. UPWARD Talent Council's integrated approach allows for Talent, Training and Employer staff to provide employer services. Employer staff work with Talent and Training Specialists to recruit for and place the talent required to meet business needs.

Streamline Regional Workforce and Economic Development Services

Our demand-driven model requires our workforce development system to place business and job seekers equally as the primary customers. To help attract, retain and expand local businesses, Michigan Works! in Region 1 has established and continues to build strong relationships with local businesses and economic development organizations. Through these relationships the UPWARD Talent Council leverages an increasing number of jobs for the region's job seeker customers while assuring that the needs of local businesses are being met thereby serving the needs of both the supply and demand side of the equation.

UPWARD Talent Council is developing formal relationships with local economic development entities in order to integrate their efforts with our business services team. Relationships will take various forms and may consist of a vendor contract for outreach services or designation of an UPWARD staff member to conduct economic development activities in addition to workforce services. These new partnerships will leverage limited resources and strengthen the many systems that currently engage with local companies. They will result in increased knowledge of skill needs across the UP, early detection for potential layoffs and layoff aversion, enhanced connections to business development resources, and more.

Expand the Functionality of the CEAC

The Career Educational Advisory Council (CEAC) serves in an advisory capacity to the UPWARD Talent Council. The CEAC's role is to support the UPWARD Talent Council's Workforce Board in building a regional talent preparation and development system that will provide all students, youth to the adult learner, with the necessary academic, technical, and work behavior skills that will meet business and industry needs to maintain and enhance the regional economy.

The CEAC is the body to recommend action for system change and be the catalyst to bring the educational system and workforce talent development/acquisition system into alignment to support the regionally developed strategic plans. To accomplish its mission, the CEAC advises the UPWARD Talent Council on matters related to educational components of talent preparation and development services and federal adult education. It shall consider and comment, when required, appropriately related grants such as the Adult Education and/or Perkins Funds.

The CEAC has replaced the Talent District Career Council in the region and members are adjusting to the changes. Once fully integrated into workforce development system in the region, the board will better function and serve the community.

Expand Regional Technology Connectivity

Linking partners with job seekers and referrals to reduce travel time and barriers will be key to expanding services in UPWARD Talent Council's expansive region. Region 1, primarily rural, has 15 counties across 16,452 square miles. This region shares a border with Canada and the State of Wisconsin. Although the Upper Peninsula makes up 29% of the land mass in the State, but only hosts 3% of the population. To link partners, job seekers and employers in remote areas, we must embrace videoconferencing technology to expand access to employment, training, education, and supportive service.

Serving Hard-to-Serve Populations

The "hardest to serve" population has significant barriers to employment, such as transportation, housing, childcare, low functioning skills, lack of educational attainments, disabilities and more. UPWARD Talent Council prioritizes its services on the hard to serve population, following the WIOA vision. Employers in the region have identified lack of employability (development of soft skills) as a significant barrier to employment. To address the barrier, UPWARD is implementing soft skills training throughout the region to accompany work-based learning. The developed program will consider employer input to the largest extent possible.

Veterans

Veteran Career Advisors (VCAs) are State of Michigan employees who provide intensive, individualized services to meet the employment needs of eligible veterans and spouses with significant barriers to employment. Services provided by these employment service professionals in assisting eligible veterans and spouses reduce and/or eliminate barriers to employment. Services include, but are not limited to:

- Resume development
- Interviewing skills, networking
- Direct referrals to other service providers

The UPWARD Talent Council complies with the Jobs for Veterans Act by giving veterans and eligible spouses priority of service for all programs. To improve services to veterans in the area, UPWARD Talent Council has co-located with Veteran staff in two of its service center locations, Marquette and Chippewa. The increased participant access to VCAs provides higher quality customer referrals. In addition to the co-location of services the following strategies will be implemented:

- UPWARD Talent Council staff training conducted by VCAs for staff to gain a better holistic understanding of Veteran programs and services available
- Co-located Veteran staff training conducted by UPWARD Talent Council to better align services and referrals

- Increased use of technology connectivity of referred veterans to reduce travel time and increase face to face discussions with VCAs

Geographic Advantages

Region 1, primarily rural, has 15 counties across 16,452 square miles. This region shares a border with Canada and the State of Wisconsin. The expansive and sparsely populated region provides unique challenges, but also advantages. Without improved technology connectivity and use, the challenges would fail to be addressed. In addition to technology connectivity, regional partners need to be highly effective with strong local and regional communication.

Education and Training Needs

Other regional strategies complement the strategy of a highly functioning WDB and CEAC collaborating to identify the training and educational needs of employers and job seekers include:

- Ingraining benefits of Michigan Training Connect for both individuals and educational institutions
- Incorporating Career Pathfinder into all programs and services to increase the number of U.P. residents who obtain a high-quality, in-demand degree and/or credential
- Utilizing Training focused UPWARD Talent Council staff to build better program knowledge of work-based training and educational opportunities in the region
- Applying the WDB's in-demand occupation list to focus on the region's education and training needs
- Seeking supplemental grants for programs, such as ApprenticeshipUSA, to meet demands
- Engaging with employers to gain a better understanding of the skills and education required for positions in specific industries
- Collaborating with CTE, MiSTEM and Skilled trades to identify demand-driven trainings

Work-Based Learning Opportunities for Unemployed

Work-based training can be an effective training strategy that can provide additional opportunities for participants finding high-quality work and for employers in developing a high-quality workforce. On-the-Job (OJT), pre-apprenticeship, registered apprenticeships, and customized training are all identified as work-based training services. During orientation to our programs, including but not limited to, WIOA, PATH, RESEA and TAA, the work-based learning opportunities are presented to unemployed workers. The awareness of the program benefits and opportunities is the initial step in gauging interest in the opportunities. Furthermore, UPWARD Talent Council utilizes Employer staff to provide work-based learning information to employers through their strong established relationships.

Integration of Regional Planning with Core Partners

The integration between core partners and regional planning efforts begins with better partner relationships. The characteristics of a strong partnership with effective communication creates a strong adaptable regional plan to adjust to the needs of the region and local communities.

Sector Initiatives

Sector-based initiatives can vary from fully formed councils, with government structure, staff support, and strategic plans, to as-needed activities. The UPWARD Talent Council’s utilization of sector initiatives varies and evolves.

In the U.P. region, the UPWARD Talent Council’s priorities are focused on industry skills alliances. The TIA/WDA defines these alliances as clusters and as follows: “a cluster is a geographic concentration of related employers, industry supplies, and support institutions in a product or service field. For the purposes of workforce development, Michigan’s clusters are broad industry sectors. There is growing evidence that industry clusters are an effective organizing framework for positively impacting economic and workforce development activities”. With that, the State of Michigan has implemented the Michigan Industry Cluster Approach and identified Agriculture, Energy, Health Care, Information Technology & Media, and Manufacturing as five priority clusters.

The UPWARD Talent Council has identified Healthcare, Manufacturing, and Construction as the major industry sections within our region. Region 1 will continue to focus on these alliances recognizing the opportunity to expand to other sectors with business demand.

UPWARD has aligned efforts around the region’s in-demand industry sectors. Examples include but are not limited to: Training approval – classroom and work-based training in line with the in-demand industry sectors and Convening Roundtable discussions with identified in-demand industry sector representatives.

Current Sector Based Partnerships and Business Involvement

The Upper Peninsula Healthcare Roundtable, the Upper Peninsula Regional Manufacturing Skills Alliance and the Upper Peninsula Construction Trades Alliance are the focus of the industry cluster approach for the region. Currently at varying levels of activity, Region 1 will work to re-engage and vitalize the manufacturing alliance while continuing to support the healthcare and construction alliances.

In addition, the UPWARD Talent Council will continue to analyze industry sectors and occupations in the region utilizing Labor Market Information and Employer data to evaluate and update its sector partnerships and business involvement.

Upper Peninsula Healthcare Roundtable

The Upper Peninsula Healthcare Roundtable members are concerned with nursing shortages and workforce shortages in the health care industry. Roundtable members identified the nursing shortage as a top priority and created strategies to recruit new prospects to nursing and encourage nurses back to the nursing profession. To support these strategies, healthcare roundtable members partnered to fund commercials and other marketing efforts resulting in a career awareness campaign for nurses.

Development of joint communication and marketing strategies, career information tools, support of Earn While You Learn career exploration activities helped to promote careers in healthcare. Today, representatives from hospitals, long-term care providers, government, education, and community-based organizations continue to meet to work to address healthcare workforce needs and to develop innovative and integrated strategies to address this crucial issue, including On-the-Job training, apprenticeships, career advancement, etc. The roundtable focuses on three strategic areas to address the skilled labor shortage: recruitment, screening and training.

Throughout the years, resources have been shared and combined efforts have been made to address common issues to include:

- Recruitment of qualified candidates
- Background checks
- Lockouts of clinical sites
- Retention issues
- Home healthcare aide certification

Upper Peninsula Regional Manufacturing Skills Alliance (UPRIMSA)

The key driver of this alliance was employer input surrounding lack of requisite skill base of the workforce as well as lack of a training system that provides a skill standard certification to use across the industrial manufacturing setting. During public meetings, forums and conversations with educational institutions the UPRIMSA coalesced around significant workforce issues that are paramount the success and survival of the industry.

The process used to obtain employer input had been primarily through the meetings of the three aligned groups of the alliance consisting of the sub-regions in the Upper Peninsula. These private sector members have a high level of involvement in terms of meeting attendance, committee work, school outreach presentations, email dialogue and presentations at workforce investment board meetings. Private sector chairs provided the leadership and all members consider themselves champions in terms of involvement in addressing key workforce issues and understanding of their own regional approaches which vary slightly based on local labor markets and industry needs. Each private sector representative has a clear understanding of the strategic role they play in moving the Upper Peninsula towards solving the impending worker and skill shortage crisis in the broad-based manufacturing industry throughout the region.

Due to the lack of media attention to manufacturing successes in the region and high level of media attention to the downturn in the automotive sector, specifically there are a number of reasons for the current worker shortages and skill gaps facing by regional manufacturing companies. One reason being a negative traditional image of manufacturing careers; another being a lack of available training opportunities precipitated by the lack of interest in those training opportunities, which led to their demise at the community college and university levels. As well, the skills gap of current or future workers to meet industry demand, and the lack of training opportunities that result in skill standard certifications is the impetus for this request for our existing UPRIMSA to expand and offer a broader scope of services. This effort aligns to our regional and statewide marketing campaign to “get the word out” about opportunities for careers in the skilled trades.

There is a renewed effort by the UPWARD Talent Council to revitalize this alliance using the Delta Manufacturing Roundtable as a model. The employer led group, facilitated by the Delta County EDA is establishing employer led best practices to increase awareness about careers in manufacturing through teacher in-services, talent tours and industry after hours that bring students and parents on-site to learn about manufacturing and partnering with the Delta Schoolcraft ISD and UPWARD Talent Council to create these best practices for career awareness.

Upper Peninsula Construction Regional Skills Alliance

The Upper Peninsula Construction Regional Skills Alliance focuses on its mission “to recruit the best and brightest into the construction industry by raising career awareness among parents, students and educators. Its formation was an industry effort to develop and implement strategies to recruit youth to the construction trades. Building the workforce pipeline remains a goal of this industry sector as the membership works to increase apprenticeships through recruitment to the trades. The impetus to form was due to an estimated 40% of the industries workforce projected retirement, academic requirements and career awareness not fully in place in education and workforce development systems, and an 8.4% growth rate through 2021 making the industry among the top 10 growth industries.

The construction and industrial trades industry contributes nearly \$100 million to the Upper Peninsula economy annually providing an average hourly rate of \$22.74 plus fringe and benefits. Led by this alliance, the Industrial Trades Career Day has become a bi-annual career fair hosted at various locations across Region 1 to allow high school students and adult learners to experience the trades first hand. This event blends career awareness with on hands learning activities. Commitment and participation by the trades contribute to the success of these events.

Regional Priorities

During the redevelopment and reassessment of the board’s strategic plan, the process for the board’s identification and selection of industry sectors is being evaluated. With the chronic talent shortage in Construction, Manufacturing and Health Career, those industries will remain priorities. They will be soon accompanied by regional priorities, based upon data-driven analysis outlined in the board’s strategic plan. Once released in December 2018, UPWARD Talent Council’s regional and local plans will be updated to reflect the updated priorities.

Administrative Cost Arrangements

Resource Leveraging Agreements

UPWARD considers co-location or rental agreements with community agencies to reduce administrative costs and improve partnerships. The Upper Peninsula's regional planning and development commissions: CUPPAD, WUPPDR, and EUP are co-located in Delta, Houghton, Chippewa county service centers, respectively.

Cost Sharing Arrangements

Following state guidance, UPWARD's local board executed Memorandums of Understanding (MOUs) with each of its required One-Stop partners. The infrastructure costs outlined in the Infrastructure Agreements, attached as an addendum to the MOU, were calculated for its required partners based on their proportionate use of the One-Stop delivery centers and relative benefits received. The IFA contributions will be reviewed and renewed annually.

Transportation and Supportive Service Coordination

Transportation

UPWARD Talent Council's expansive and rural geographic region provides many challenges to coordinate transportation and supportive services. The infrequency and sparsity of the public transportation routes may inhibit customers – especially those without personal transportation from regularly participating in work and education. UPWARD supports initiatives, such as breaking down county line restrictions and introducing regional bus routes, to extend the transportation network and remove the significant barrier.

While the lack of reliable public transportation in the Upper Peninsula has been a topic of discussion for many years, UPWARD has found alternatives for customers. Alternatives such as improving our partnerships with community agencies to have greater customer accessibility i.e. Unemployment Insurance Agency, Bureau of Services for Blind Persons, Michigan Rehabilitation Services, increasing technological capabilities of rural service centers and providing transportation supportive services to remove the employment barrier.

Talent Tours, Career Fairs, Job Fairs

Employers throughout Region 1 play a role in the planning and implementation talent tours, career fairs, and job fairs. This successful career fair model calls for pre-event preparation, to assist in preparing the best possible job seekers for the employers, including, but not limited to:

- Resume review of job seeker resumes planning to attend the career fair, by Michigan Works! staff or employer representatives,
- Focus on career pathway development using Pathfinder,
- Mock interviews by Michigan Works! staff or employers prior to the event,
- Employability skill building workshop opportunities and
- Employer panel information sharing/question and answer opportunity.

The UPWARD Talent Council continues to partner with economic development and training partners across Region 1 to meet the needs of employers and foster growth in demand sectors and occupations.

Coordination of Supportive Services Delivery

UPWARD provides career and training supportive services to eligible participants based on documented financial assessment, individual circumstances, the absence of other resources and established funding limits. Prior to providing supportive services, staff refer to partner agencies to coordinate services.

Current and Potential partners include, but are not limited to:

- Department of Health and Human Services
- Bureau of Services for Blind Persons
- Community Action Agency
- Goodwill
- Salvation Army
- United Way
- MSHDA
- 211
- 4 C's (Community Coordinated Child Care)
- Local Transit Agencies

In addition to coordinating with partners to provide supportive services, UPWARD staff meet weekly to discuss subregional program and service strategies. Staff from all focus groups: employer, talent, training participate in the discussion. Furthermore, staff meet with regional partners i.e. SBDC and MEDC to discuss impactful regional strategies. Consistent contact and discussion within UPWARD and with partners is critical to address unique geographical challenges in our region.

Economic Development Coordination

Workforce development services and economic development interests closely align. Economic development staff support new and expand current industries that produce jobs. Workforce development staff help ensure a supply of skilled workers to meet employer demand. With closer coordination and alignment of services in the U.P., both partners can be better prepared to help achieve economic prosperity for the region.

UPWARD Talent Council Michigan Works! is the employer of record for several staff members of local economic development organizations including: Delta County EDA, Schoolcraft County EDA, KEDA, Accelerate U.P., and Alger County Chamber of Commerce & Greater Munising Bay Partnership for Commerce Development. As the employer of record for economic development partners, our relationship is inherently close and collaborative in those counties. UPWARD is currently evaluating relationships with all economic development partners to implement strategies to align services region wide.

Strategies that will be analyzed for potential implementation in our region include:

- Supporting collaboration between employers and education providers to build worker's skills.

- Developing sector strategies for joint planning and programming.
- Increasing the coordination of funding to achieve workforce and economic development goals.
- Using technology and data to connect employers and the workforce.

Our Local Elected Official, Workforce Development Board, and Career Educational Advisory Council (CEAC) are comprised of local elected officials, employers, education partners, labor organizations and other community partners who review, comment and approve the plan, and any subsequent modifications. Additionally, other community partners including economic development partners may engage in the regional planning process for UPWARD Talent Council through established communication streams i.e. Roundtable Discussions, board meetings, sponsored events, etc.

Education and Training Providers

Training and education options for job seekers and workers in our region will continue to be identified and developed in response to information obtained from employers, economic developers and training institutions. The involvement in all parties to determine industry demands and regional changes is a critical tool for expanding industries, meeting the employer needs and upskilling workers.

UPWARD will continue to expand our collaboration with public and private universities, community colleges, Adult Education providers, Intermediate School Districts and K-12 educators in our region. Our CEAC will assist with the expansion and collaboration of educational partners in the local area.

Job seekers interested in education and training in the region are referred to Michigan Training Connect, housed within the Pure Michigan Talent Connect System to research training institutions. The program is complemented with the Michigan Education & Career Pathfinder tool. The tool provides information to students, their parents, and guidance staff to make informed choices about educational and career options, as well as to help with creation of educational development plans. This free tool uses current labor market information, longitudinal wage data, and other institutional data and metrics, allowing improved skills-matching to career paths and jobs.

Business Involvement

UPWARD's direct employment relationships with several local economic development organizations provides a unique opportunity to serve as a link between existing and emerging businesses. UPWARD delivers workforce development services that are primarily focused on existing business and services as the employer of record for economic development organizations that are primarily focused on emerging and expanding businesses.

Targeted Business Sectors/Industries

UPWARD prioritizes close collaboration with economic development organizations to align with prioritized job clusters in the area. UPWARD does not limit its collaborative efforts to only the

targeted industries, because all businesses no matter the size and impact are vital to the success of our fragile economies in our rural communities.

Performance Accountability

Performance Negotiations

TIA calculates performance metrics for UPWARD Talent Council Michigan Works! region based on historical performance averages, target performance goals, actual performance in the most recent program year and the State's negotiated level of performance. To review, UPWARD analyzes the targeted performance metrics and calculations and considers other local factors that may affect performance. After review, UPWARD negotiates the performance metrics in good faith, if necessary.

Performance Accountability

UPWARD Talent Council enters all WIOA performance data into the state data intake system (OSMIS) including: employment, supplemental wage and credential attainment information. UPWARD will track current levels of performance utilizing the ETA performance tool in OSMIS to complement routine reports to ensure current, accurate performance and staff accountability.

UPWARD Talent Council Local Plan

Regional Labor Market Data and Economic Conditions

Refer to Regional Plan section, Labor Market and Data Economic Conditions.

Strategic Vision and Goals

UPWARD Talent Council has contracted with Woodside Strategies, LLC to develop a strategic plan. The resulting plan will focus on integration across programs, connections to partners, and strategically targeting employer customers in demand industries to prepare an educated and skilled workforce (including youth and individuals with barriers to employment). The plan is expected to be completed by December 2018. Once completed, the board's strategic vision and goals will be added to the local plan.

Performance Measures

Performance Measure	Target Factors				
	Average Simulated WIOA Performance PY 11 - 16	PY 17 Target Performance	PY 17 Actual Performance (through Q3)	PY 18 Negotiated Performance Level	PY 19 Negotiated Performance Level
WIOA Title I – ADULTS					
Employment Rate 2 nd Quarter After Exit	93.2%	84.0%	90.3%	88.2%	88.2%
Employment Rate 4 th Quarter After Exit	75.9%	70.0%	83.3%	76.1%	76.1%
Median Earnings – 2 nd Quarter After Exit	\$6,873	\$6,785	\$6,986	\$6,836	\$6,836
Credential Attainment Rate – 4 th Quarter After Exit	89.1%	69.0%	87.7%	79.0%	80.0%
WIOA Title I – DISLOCATED WORKER					
Employment Rate 2 nd Quarter After Exit	94.1%	87.0%	93.4%	90.5%	90.5%
Employment Rate 4 th Quarter After Exit	80.5%	73.0%	85.2%	80.3%	80.3%
Median Earnings – 2 nd Quarter After Exit	\$7,173	\$7,250	\$8,642	\$7,690	\$7,690
Credential Attainment Rate – 4 th Quarter After Exit	93.0%	48.0%	92.9%	76.8%	77.7%
WIOA Title I – YOUTH					
Employment Rate 2 nd Quarter After Exit	72.8%	80.0%	79.7%	76.1%	76.1%
Employment Rate 4 th Quarter After Exit	69.6%	63.0%	93.8%	74.6%	74.6%
Credential Attainment Rate – 4 th Quarter After Exit	68.9%	70.0%	60.0%	64.7%	64.7%
WIOA Title III – WAGNER-PEYSER					
Employment Rate 2 nd Quarter After Exit	51.7%	66.0%	76.4%	66.2%	66.2%
Employment Rate 4 th Quarter After Exit	49.3%	67.0%	71.2%	64.3%	64.3%
Median Earnings – 2 nd Quarter After Exit	\$3,698	\$7,015	\$4,872	\$5,259	\$5,271

Measurable Skill Gains

UPWARD Talent Council will continue benchmarking Measurable Skills Gains through Program Year 2019 and will negotiate levels for program year 2020 based on the collected data.

Effectiveness in Serving Employers

UPWARD Talent Council offers and will continue to offer robust employer services in the region. We are awaiting additional guidance from the State regarding the approaches to gauge three critical workforce needs of the business community.

Partner and Resource Alignment

UPWARD Talent Council has contracted with Woodside Strategies, LLC to develop a strategic plan. The resulting plan will address the local board's strategy to align local resources, required partners, and entities that carry out core programs to achieve its strategic vision and goals. The plan is expected to be completed by December 2018. Once completed, the strategy will be added to the local plan.

Workforce Development System

UPWARD Talent Council brings together, in strategic coordination, the core programs focusing on skills development. Programs offered directly and through referrals from the UPWARD Talent Council include:

- Wagner-Peyser Employment Services (WIOA Title III)
 - Veterans Employment and Training
 - Migrant and Seasonal Farmworker
 - Labor Exchange through Pure Michigan Talent Connect
 - Reemployment Services
 - Work-Based Training for Special Populations
- Adult, Dislocated Worker, Out of School Youth, In School Youth (WIOA Title I)
 - National Dislocated Worker Grants
 - Rapid Response
- Adult Education (WIOA Title II and State Section 107)
- Trade Adjustment Act – all iterations
- Vocational Rehabilitation (WIOA Title IV)
- Partnership. Accountability. Training. Hope. (PATH) – Welfare Reform
- Jobs for Michigan's Graduates
- Senior Community Service Employment Program, operated by UPCAP

Priority of service is given to veterans who are customers of all employment and training services. All individuals with disabilities are provided with reasonable accommodations to participate in services.

Services for preparing an educated and skilled workforce, including youth and individuals with barriers to employment will be further streamlined by improving existing services and community collaborations, enhancing academic and workplace literacy programs, and implementing innovative services and activities. With support from local school systems and community partners

the Jobs for Michigan's Graduate program strives to equip young adults with the skills to overcome barriers and win in education, employment, and as citizens. To improve coordination of service alignment in the U.P., UPWARD has a dedicated team of staff for each focus area – Employer, Training and Talent. Training Staff are tasked with outreach and program awareness with partners in the education system including, but not limited to: K-12 school system, Career & Technical Education Programs, alternative schools and post-secondary education system.

In addition to internal coordination of staff, UPWARD recognizes strong partnerships and relationships are crucial to align services. Our partnerships with American Job Center required providers have improved drastically with the development and implementation of MOUs. All established relationships will be strengthened with the following additional strategies.

- A. Utilize the Career & Educational Advisory Council (CEAC) to ensure that the workforce system is engaged with education system. UPWARD will rely on the CEAC to coordinate with educational entities in guiding career development programs and career pathways, such as high schools, community colleges, career and technical education, adult education programs, prisoner reentry programs, corrections education, veterans' programs, and college access networks. Additionally, the CEAC will assist UPWARD with the development and implementation of career pathways.
- B. Take the lead in the region for talent development activities and knowledge of workforce issues. Positioning UPWARD Talent Council as the lead resource for services, data, and local intelligence on both job seeker and employer needs will ensure continuous involvement in regional and local talent discussions.

Access to Services

Access to employment, training, education, and supportive services is a challenge in our expansive rural region, especially for individuals with disabilities and other barriers. UPWARD Talent Council's comprehensive American Job Center is centrally located in Marquette County. To reduce the significant travel burden for customers, UPWARD has affiliate centers in Alger, Baraga, Chippewa, Delta, Dickinson, Gogebic, Houghton, Iron, Luce, Mackinac, Menominee, Ontonagon and Schoolcraft Counties. With sparse population, low customer traffic and limited locations available, several of our affiliate centers are open part-time in remote locations. The board utilizes the following strategies to expand access and reduce the challenges presented.

- Embrace videoconferencing technology to expand access to employment, training, education, and supportive service by connecting staff and partners in other locations to customers in remote areas. Previously UPWARD only focused its efforts on improving connectivity internally, however our goal is to expand that to all partners. Linking partners with job seekers and referrals to reduce travel time and barriers will be key to expanding services.
- Expand sponsorship and/or hosting of small-large scale hiring and career events in the region. This will position UPWARD as the forefront of workforce development in the region and expand awareness of all services available.
- Increase social media presence on various platforms i.e. Facebook, Twitter, and Instagram. Social media usage allows UPWARD to target specific audiences with posts, hashtags,

pictures, shares, etc. We promote hot jobs, upcoming events, job fairs, share partner information and job search tips to our following in the different platforms. To better integrate social media in our communities, we need to improve communication between partners on the platforms and use different targeting features i.e. boosting, brand specific hashtags, chat/live features.

- Relocate centers to more prominent locations. UPWARD Talent Council reviews and analyzes service center traffic annually to determine if a change in location is necessary. In past year, UPWARD has relocated four of its service centers and is considering relocating in various other locations to increase accessibility of its centers.

Career Pathways & Co-Enrollment

The UTC WDB recognizes the critical nature of preparing for careers and competing in the 21st century. This translates to industries and individuals developing career pathways to build a highly skilled workforce. Creating career pathways that lead to sustainable careers through combinations of secondary and postsecondary education, including apprenticeship programs and trade specific credentials, is one of the best methods to prepare eligible individuals for a successful long-term career and ensure local industry has access to a highly skilled workforce.

Individualized long-term career planning is incorporated to each program delivered. Specifically, in alignment with the WIOA, UPWARD approaches career pathways in Individual Employment Plans/Individual Services Strategies and empowers customers to envision long-term educational and/or career advancement. The plans are fluid and flexible, enabling case managers to administer and/or coordinate services appropriately including training to obtain necessary credentials.

Facilitating career pathways for customers is purposeful and strategic, encompassing coordination with program partners, which may include, but not limited to, co-enrollment in core programs. Participants are co-enrolled when deemed necessary to provide additional services and streamline the transition to employment.

Credentials

Career pathways prepare individuals to be successful in a range of secondary or postsecondary education, including apprenticeships. When appropriate, education and workforce preparation activities/training for a specific occupation or occupation cluster will be offered concurrently and through co-enrollment. UPWARD will continue to work with secondary and post-secondary institutions in developing stackable credential opportunities for entry and incumbent workers. UPWARD commits to assist in fostering partnerships between pre-apprentice programs, registered apprentice and community colleges to identify in demand career pathways. Other activities that are aimed at improving access to postsecondary credentials leading to portable and stackable industry-recognized certificates include expanding access to:

- *On-the-Job Training (OJT)* – employers are offered OJT contracts to hire and upskill individuals who are lacking skills and recommended or required credentials.
- *Going Pro Talent Fund* – provides support to employers who wish to upskill their existing workforce while providing incentives to grow their business, ideally resulting in new hires and higher wages for all workers as they gain skills.

- *Work-Based Training* – short-term training catered to youth or individuals with barriers to employment to address the barriers and upskill the workers.

Local Strategies and Services

Employer Engagement

UPWARD Talent Council Michigan Works! facilitates engagement of employers, including small employers and employers in-demand industry sector, in the development and continuous improvement of workforce development system. This engagement ensures that employers are guiding the system, and that the system is delivering programs and services that ultimately meet their needs. Through established employer relationships, UPWARD staff gauge interest and eligibility for workforce development programs. The following local strategies will be used to expand the engagement of employers in the local area in workforce development program:

- *Refocus employer engagement efforts.* Strategic and purposeful employer engagement efforts will align in-demand industry sectors and occupations in the local region with workforce development programs and services.
- *Re-engage current sector partnerships.* The Upper Peninsula Healthcare Roundtable, the Upper Peninsula Regional Manufacturing Skills Alliance, and the Upper Peninsula Construction Trades Alliance are the focus of UPWARD's regional industry cluster approach. Currently at varying levels of activity. An analysis is overdue to initiate new strategies with the sector partnerships to identify new priorities, increase membership and participation across the region.
- *Enhance Career Services.* Increase services and access to programs offered to job seekers tailored to meet employer needs. Programs, such as, comprehensive skill assessment, soft-skill lessons, coaching, relocation, short-term training like work-based training and On-the-Job training.

Coordination between Workforce Development Programs and Economic Development

UPWARD's fully integrated service delivery model provides ample opportunities for all staff – Employer, Talent and Training to engage with businesses and partners, including economic development agencies. The integrated approach leverages the full scope of workforce programming to ultimately meet the needs of local employers.

Strategies that will be analyzed for potential implementation in our local communities include:

- Supporting collaboration between employers and economic developers to survey worker's needs.
- Developing strategies for joint planning and programming.
- Increasing the coordination of funding to achieve workforce and economic development goals.
- Using technology and data to connect employers and the workforce.
- Building relationships with community partners to provide more comprehensive and appropriate services to local employers.

One-Stop Delivery System and Unemployment Programs

By developing positive and cooperative relationships with the Unemployment Insurance Agency at the local level, UPWARD Talent Council can better serve our business customers and job seekers through unduplicated, coordinated services. Unemployment Insurance staff members are co-located in two of our American Job Centers: Marquette and Chippewa. The co-location provides integrated services to our customers and strengthens the linkages between the workforce development system and Unemployment Insurance programs.

UPWARD will implement the following strategies to better integrate programs for all service centers including:

- Evaluate additional opportunities for co-location in our region.
- Expand the use of technology for connectivity with UIA.
- Conduct UPWARD staff training to increase knowledge and resources for unemployment insurance.
- Develop stronger relationships with UIA administration to strategize additional training opportunities.

Coordination of Local and Regional Economic Development Activities

Local Coordination

UPWARD recognizes that workforce development services and economic development interests closely align. With closer coordination and alignment of services in the U.P., both partners can be better prepared to help achieve economic prosperity for the region and for local communities.

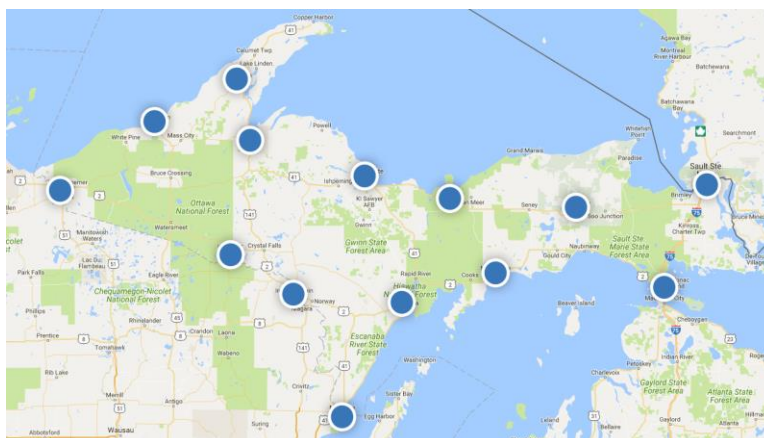
UPWARD Talent Council Michigan Works! is the employer of record for several staff members of local economic development organizations including: Delta County EDA, Schoolcraft County EDA, KEDA, Accelerate U.P., and Alger County Chamber of Commerce & Greater Munising Bay Partnership for Commerce Development. As the employer of record for economic development partners, our relationship is inherently close and collaborative in those counties.

UPWARD's fully integrated service delivery model provides ample opportunities for all staff – Employer, Talent and Training to engage with businesses and partners, including economic development agencies. The integrated approach leverages the full scope of workforce programming to ultimately meet the needs of local employers.

Entrepreneurial Skills Training and Microenterprise Services

In partnership with local agencies, UPWARD Talent Council offers workshops to provide general knowledge and guidance of how to start your own business and promote entrepreneurial training. Partners in our region include Accelerate U.P., Small Business Development Center (SBDC), Northern Michigan University Invent and MEDC. The partners provide the services on site through appointments. UPWARD's dedicated Employer staff work closely with employers – current and future to understand their potential needs and refer to the services available at the partner organizations.

One-Stop Delivery System



Fourteen American Job Centers are located in the region to service fifteen counties. One service center, located in the largest population hub of Marquette, is the Comprehensive center and is open Monday through Friday 8:00am to 5:00pm. Other primary centers (although not considered Comprehensive) are located in the population hubs of Houghton, Escanaba, and Sault Ste. Marie. Other centers are located in communities across the UP, strategically positioned to reduce travel distance for customers. Established hours vary by center. See our website for exact locations and hours: www.upmichiganworks.org/contact-us.

Every service center offers access to all programs – all Talent-focused staff members (Talent Specialists) are trained in all programs and work holistically to access the resources needed for each individual job seeker. Customers are connected to available jobs through Employer Specialists and to training opportunities through Training Specialists. All three focus areas work together to provide a robust mix of services and programs that effectively prepare job seekers to meet employer needs.

In addition, customers are connected to various resources that assist them in achieving their goals. Job seeker customers access programs and services that remove barriers to obtaining and retaining employment, such as transportation and childcare assistance. Employers are connected to resources that assist in development and growth, such as business counseling or economic development incentives. Some of these resources are co-located; others are available via technology or by appointment.

Numerous resources are available on publicly-accessible computers in each AJC. These include job search websites and programs, such as Pure Michigan Talent Connect and resume-writing software. Other resources include the 2-1-1 database, local transit and transportation schedules (where available), childcare information and referral, food pantries, and more.

Continuous Improvement

As of July 1, 2018, all workforce programs are provided via direct delivery through UWPARD Talent Council employees. By providing services through direct delivery, UPWARD Talent Council maintains close oversight of program delivery. Integration of programs allows for a seamless experience for both job seeker and employer customers, as well as partners. All staff are

cross-trained in all programs, in order to improve understanding of roles, expectations, and services. This allows the system to respond in a robust manner to the needs of local employers, bringing a full menu of services that can be customized based on the community and/or company.

Quality of service delivery is a top priority, and continuous improvement is an ongoing effort for all staff. Activities that ensure continuous improvement within the system include, but are not limited to, the following:

- Professional development opportunities through the Michigan Works! Association and other venues;
- Ongoing program training;
- Management coaching of frontline staff;
- Regular updates to policies, job aids, and procedural documents;
- Presentations from partners at staff meetings;
- All-staff meetings are held at four hubs throughout the region on a regular basis, in addition to two all-staff training days per year.

Beginning in 2019, the One-Stop Operator will lead a workgroup of staff representatives from across the region to develop Customer Service Standards and establish mechanisms for measuring customer satisfaction and improvements in customer service. A training plan will also be developed based on the needs identified in measuring implementation of the standards.

Internal monitoring also plays a role in ensuring continuous improvement. Currently, UPWARD Talent Council contracts with an independent consultant to work with administrative leadership to conduct monitoring activities of all programs and services. The approach to these monitoring efforts is for the purpose of quality review, identifying issue areas before they become significant problems. Monitoring also informs the direction and content of training, to ensure that all staff are knowledgeable and proficient in program expectations and requirements.

Access to Services

The vast geography presents a challenge to accessibility; it is not feasible to have physical locations in every community, which forces many customers to travel significant distances in order to visit a center. However, UWPARD Talent Council reviews the locations of its AJCs on a regular basis, determining the best fit for population size and traffic flow. All AJCs are located in population hubs that offer other amenities, such as childcare, health services, grocery stores, and gas stations.

Where possible, partners are co-located at the AJCs. Co-location partners, in various areas, include UIA, MRS, Veterans Services, and Adult Education. Every center has a phone line available for UIA customers to readily access customer service. This type of technology, along with co-location, provide “one-stop” service delivery to improve customer access.

Use of technology is a priority for the workforce system, especially considering the large geography covered. Virtual connections are available for staff meetings, networking opportunities, interviewing, and providing career services. In addition, staff are familiar with use of virtual technologies in the job search process, such as Skype interviewing, applicant tracking systems, and social media.

Compliance with Nondiscrimination Provisions

UPWARD Talent Council Michigan Works! will deliver services to all customers equally by adopting a universally accessible system that meets the diverse customer needs existing in our local delivery area, including individuals with disabilities, cultural background and individuals with barriers to employment.

As a recipient of federal funds, UPWARD will comply with regulations relating to non-discrimination, equal opportunity, and inclusion. Adhering to the provisions as mandated by:

- Section 188 of the WIOA;
- Section 504 of the Rehabilitation Act of 1998, as amended;
- Titles I and II of Americans with Disabilities Act (ADA);
- TIA's Self-Certification Accessibility Checklist;
- 29 CFR Part 38;
- Talent Investment Agency Policies.

In addition, the UPWARD Talent Council will assure that throughout the local system, persons with physical, mental, cognitive and sensory disabilities will have programmatic and physical access to all services and activities, including accommodations as requested.

Physical accessibility is evaluated prior to relocation of service centers and on a continuous basis. If an issue arises, then we actively work with the landlord, city, or other contacts to remedy the concerns.

In addition, UPWARD partners with community resources i.e. Michigan Rehabilitation Services, Bureau of Services for Blind Persons to understand the needs of individuals with disabilities in our region and ensure we have the proper technology, materials, facilities, and programs and services to accommodate them.

Roles and Resource Contributions of One-Stop Partners

Following state guidance, UPWARD's local board executed Memorandums of Understanding (MOUs) with each of its required One-Stop partners. The MOUs outlined the roles and contributions of each One-Stop Partner. The MOUs will be reviewed and renewed every three years. The infrastructure costs outlined in the Infrastructure Agreements, attached as an addendum to the MOU, were calculated for its required partners based on their proportionate use of the One-Stop delivery centers and relative benefits received. The IFA contributions will be reviewed and renewed annually.

WIOA Adult and Dislocated Worker Activities

Employment Activities

All persons have access to employment-related information and self-service tools, without restrictions. Services that are not primarily informational and self-service require WIOA registration. Eligibility for career services and training also requires the WIOA registration. Eligibility for career services is restricted to Adults and Dislocated Workers who are unemployed

or employed and in need of career or training services to obtain or retain employment that allows for self-sufficiency.

Basic Career Services

Basic career services are universally accessible and available to all individuals seeking employment and training services. All basic career services are administered and provided by UPWARD's integrated staff. Basic career services include:

- WIOA eligibility determination
- Outreach/intake
- Orientation to information and other services available through the One-Stop system.
- Initiation assessment of skills levels
- Labor exchange services
- Provision of referrals to and coordination of activities with other programs and services, including programs and services within the One-Stop delivery system and, when appropriate, other workforce development programs.
- Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and labor market areas.
- Provision of performance information and program cost information on eligible providers of training services by program and type of providers and workforce services by program and type of providers.
- Provision of information, in usable and understandable formats and languages, about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area's One-Stop delivery system.
- Provision of information, in usable and understandable formats and languages, relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance
- Provision of information and assistance regarding filing claims for unemployment compensation, by which the One-Stop must provide meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation.
- Assistance in establishing eligibility for programs of financial aid assistance for training and education programs (non-WIOA).

Individualized Career Services

Individualized career services are based on the employment needs of the individual as determined jointly by the individual and the career planner and may be identified through an Individual Employment Plan. These services are readily available at our comprehensive One-Stop service center in Marquette and through connected technology (video conferencing) at all affiliate centers.

- Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers.
- Development of an Individual Employment Plan.
- Group counseling.
- Individual counseling.
- Career planning, e.g., case management,
- Short-term pre-vocational services.
- Internships and paid or unpaid work experiences that are linked to careers, internships and work experiences may be arranged within the private for-profit sector, the non-profit sector, or the public sector.
- Transitional Jobs.

- Workforce preparation activities.
- Financial literacy activities
- Out of area job search assistance and relocation assistance.
- English language acquisition and integrated education and training programs.

Training Activities

Training services are available in the UPWARD region for employed and unemployed Adult or Dislocated Workers who after an interview, evaluation or assessment and career planning are determined to be unlikely or unable to obtain or retain employment that leads to self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone. The participant must be determined to be in need of training services and possess the skills and qualifications to successfully participate in the selected program. Training services under the WIOA are provided when other sources of grant assistance, such as Pell Grants, are unavailable to the participant.

Training services available to Adult and Dislocated Workers include the following:

- Adult Education and Literacy Activities
- Work-Based Training
 - On-the-Job Training
 - Incumbent Worker Training
 - Registered Apprenticeships
 - Customized Training
- Classroom Training
- Pre-Apprenticeship Training
- Skill Upgrading and Re-training
- Entrepreneurial Training
- Job Readiness Training
- Occupational Skills Training

The list is not all-inclusive and training services may be combined if appropriate. For example, a registered apprenticeship may incorporate both OJT and classroom training.

All programs of training services must lead to:

- a. An industry-recognized certificate of certification; a certificate of completion of a registered apprenticeship, a license recognized by the state involved or the federal government.
- b. A post-secondary credential (an associate or baccalaureate degree).
- c. Consistent with 20 Code of Federal Regulation (CFR) 680.350, a secondary school diploma, or its equivalent.
- d. Employment.
- e. Measurable skill gains toward such a credential or employment as described in (a) or (b).

Adults and Dislocated Workers must meet with a career planner to discuss eligibility training criteria. An Individual Employment Plan will be jointly developed by the participant and the career planner to identify employment and education goals, the appropriate achievement objects and the corresponding combination of services including supportive services and training for the participant to accomplish the outlined goals. The IEP will be the roadmap for case management

services throughout enrollment and will be continually reviewed throughout the participant's engagement in training to evaluate goal progress.

Local Youth WIOA Activities

Activities Inclusive of Individuals with Disabilities

UPWARD Talent Council Michigan Works! is the link between workforce development, education, juvenile justice and social service agencies, as well as coordinating with local employers to provide “at-risk” youth entry-level jobs, internships, mentoring, On-the-Job training and work experience in high-demand occupations.

To most effectively meet the needs of youth in the region, the following services are available to individuals ages 16 to 24:

- Tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies;
- Alternative secondary school offerings or dropout recovery services;
- Paid and unpaid work experiences with an academic and occupational education component;
- Occupational skill training, with a focus on recognized postsecondary credentials and in-demand occupations;
- Leadership development activities (e.g. community services, peer-centered activities);
- Supportive Services;
- Adult mentoring;
- Follow-up services for at least 12 months after program completion;
- Comprehensive guidance and counseling;
- Integrated education and training for a specific occupation or cluster;
- Financial literacy education;
- Entrepreneurial skills training;
- Services that provide labor market and employment information about in-demand industry sectors or occupation available in the local area, such as career awareness, career counseling, and career exploration services;
- Postsecondary preparation and transition activities.

The required program elements will be delivered in a seamless fashion, with individualized strategies that fit the needs of each participant. At-risk youth's employment and life barriers are identified and addressed in Individual Service Strategies, which map plans for overcoming identified barriers and lead to self-sufficiency, including continuing education and employment. The program elements are either delivered directly by UPWARD staff or through referrals to partner organizations in the local area.

The UPWARD Talent Council complies with the WIOA Section 188 that addresses servicing individuals with disabilities. We partner with local organizations to provide reasonable accommodations for youth with disabilities.

Jobs for Michigan's Graduates (JMG)

UPWARD braids WIOA Youth programming and funding with JMG to support at risk youth in concentrated regions. UPWARD has an active contract with Youth Solutions, JMG's administrative entity. In addition to administering the program's ISY model at Marquette Alger Middle Technical College in the UP, UPWARD recently agreed to administer the OSY model throughout the region.

The program's In-School-Youth (ISY) model emphasizes drop-out prevent, drop-out recovery, and school-to-career/college services for at-risk, low income youth. The program's OSY targets youth ages 16-24 who: have left the traditional high school system; are interested in completing the requirements of obtaining a high school diploma or recognized equivalent; and want, need and are able to profit from the Jobs for American's Graduates (JAG) program model.

We will continue to pursue and develop partnerships to deliver the program and meet performance requirements of both funding sources.

Additional Assistance Definition

UPWARD Talent Council defines additional assistance as an individual who meets one or more of the following:

- History of School Truancy
- Lack of Stable Employment History
- Family or Personal Substance Abuse History
- One or More Parents Currently Incarcerated
- Emancipated Youth
- Emotional, Medical or Psychological Problems

The local Additional Assistance Limitation policy is attached as Attachment 2.

Waivers

UPWARD Talent Council Michigan Works! takes advantage of appropriate waivers for ongoing development activities in the region. The State of Michigan sought a waiver from the WIOA Section 129(a)(4)(A) and 20 Code of Federal Regulations Part 681.410, which require not less than 75 percent of funds allotted to states under Section 127(b)(1)(C), reserved under Section 128(a), and available for statewide activities under subsection (b), and no less than 75 percent of funds available to local areas under subsection(c), be used to provide youth workforce investment activities for Out-of-School (OSY). With the approval of the State Waiver, UPWARD lowered its OSY expenditure targets to a minimum of 50 percent or more. UPWARD will utilize this waiver locally to allow greater flexibility to serve at risk In-School Youth.

Secondary and Post-Secondary Education Programs

The UPWARD Talent Council's demand-driven approach focuses on alignment of efforts, initiatives, programs, and funding around key industry clusters. Our collaboration with community

agencies, employers, economic developers, career technical education, secondary and post-secondary education providers, and other partners with shared interests provide an opportunity to leverage funds for services not funded under the WIOA. Furthermore, old and new collaborations are being formed or renewed and ultimately improve service delivery, to avoid duplication of services. UPWARD currently engages with secondary schools through Jobs for Michigan's Graduates providing vital curriculum and education on soft skills and in-demand career industries and partnering with Intermediate School Districts and employers to provide talent tours across the region. Other collaborations involve Area Vocational/Occupational Training Resources.

Our system works with post-secondary education providers across the region to develop training curricula that meets labor market demand. Post-secondary and secondary institutions have representation on our Career Educational Advisory Council and our Workforce Development Board while actively participating in our Regional Skill Alliances. These technical educational entities offer specific training to meet the needs of employers in those high-demand industry sectors.

Supportive Services

Supportive services provide eligible participants career and training supportive services based on documented financial assessment, individual circumstances, the absence of other resources and established funding limits. UPWARD Talent Council's additional parameters for allowable supportive services for each funding source are outline in local Supportive Service policy (Attachment 3).

Needs Related Payments

Needs-related payments provide financial assistance to participants for the purpose of enabling them to participate in training and are a supportive service authorized by WIOA Sec. 134(d)(3). Unlike other supportive services, to qualify for needs-related payments a participant must be enrolled in training. At this time, UPWARD Talent Council will not provide Needs-Related Payments to participants.

WIOA Activity Coordination with Supportive Services

Supportive services are provided in the absence of other resources and funding limits. To ensure resource and services coordination, staff reference OSMIS *Supportive Service* data entry fields, Case Notes and refer to partner agencies prior to providing an individual a supportive service. The UPWARD service centers have developed partnerships with local community-based organizations that can provide comprehensive services. Under its partnership approach, our staff work closely with community organizations such as Goodwill, St. Vincent DePaul, SAIL and others to provide resources and support disadvantaged local residents. Services are available upon enrollment and upon exit for Adult and Dislocated Workers. For WIOA-Youth participants, supportive services are available as follow-up services for up to 12 months after exit.

Support for transportation assistance ranges from bus tokens, car repairs, mileage reimbursement, and car purchases (PATH only). These funds are reserved as the means of last resorts and will be coordinated with other service providers. Other supportive services are provided to individuals on a case by case basis.

All supporting documentation of each provided supportive service is placed in the participant's file and case noted in the OSMIS. The removal of the participant's identified barrier and outcome is then documented in the participant's Individual Employment Plan/Individual Service Strategy.

Funding Cap

At this time, the UPWARD Talent Council has not established a local funding cap on participant services.

Wagner-Peyser Act Services

Plans, Assurance and Strategies to Maximize Coordination of Services

UPWARD Talent Council staff are fully integrated and trained on all direct or indirect services available at the service center. The integrate allows for a streamlined customer service approach where staff can provide basic career activities in Wagner-Peyser, screen for program eligibility (WIOA, TAA, etc.) and enroll the participant. The staff establish trust while learning the customer's career goals and needs, both which improve customer service and program outcome. Consequently, the natural flow of services prevents duplication and improves services provided through the One-Stop delivery system. Additionally, WIOA partner organizations present services and programs at UPWARD Talent Council all-staff training events. The regular presentation of services to UPWARD staff very staff knowledge on the services and programs available to customers by referral and the referral process.

UPWARD Talent Council's Point of Contact

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Description of Services

The UPWARD Talent Council direct delivers Employment Services at Michigan Works! Service Centers across the Upper Peninsula. UPWARD is a local unit of government and a merit-based organization.

Wagner-Peyser funded services are provided at no cost to employers and job seekers. The UPWARD Talent Council provides Employment Services at Michigan Works! Service Centers across the Upper Peninsula. The locations are barrier free for individuals with disabilities.

Equitable access to Employment Services will be provided to any individual without regard to his or her place of residence, current employment status, or occupational qualifications. No priority in referral will be extended to any job seeker or group of job seekers except in accordance with legal requirements. The UPWARD Talent Council will ensure that our system will not make any referral which will aid directly or indirectly in filling a job which would give services to an employer known to discriminate.

Labor Exchange

Career Services are offered at the UPWARD Talent Council Michigan Works! Service Centers based on Customer need. Examples include:

Self-Service using the Michigan Talent Connect System:

All workstations within the resource areas of our Michigan Works! Service Centers are configured with Windows, Microsoft Word, PowerPoint, and Excel and have access to the Internet. Internet based typing tutorials, skill checkers (typing, math, 10-key entry, etc.) and self-improvement applications (interviewing, dress for success, etc.) are available. For employers, self-service is any service that is provided to employers through an electronic resource or at a physical location in which there is little to no staff involvement.

Facilitated Services:

In any case where an employer or a job seeker has difficulty or is unable to participate in Michigan's Talent Connect labor exchange system due to lack of access to the system, due to lack of computer familiarity, literacy, disability or some other barrier, facilitated access will be offered.

Staff- Assisted Services:

The UPWARD Talent Council will provide staff assisted services (job seeker selection and referral) through its merit-based staffed employees. Staff-Assisted Services for job seekers include, but are not limited to, career guidance, specific labor market information, job search workshops, resume writing assistance, and other job search assistance activities. A service that requires a significant amount of staff-time. Services for employers may include: Input job orders on the Pure Michigan Talent Connect; complete a search of resumes that match the criteria of job orders; contact jobseekers for initial screenings prior to interview; and schedule interviews.

All levels of services are provided at each of UPWARD Talent Council's locations. Core and intensive services are provided one-on-one and in group settings.

Employment Services

Employer staff are designated to serve employer customers within a geographic coverage area, typically spanning two counties. Business services are integrated with their teams to holistically provide services to the community, connecting job seekers to employers from a variety of sources. Services provided to employer customers include assistance with recruitment and hiring, access to training, and connections to partners and other programs. The integrated teams leverage the full scope of workforce programming to ultimately meet the needs of local employers.

Employer Specialists provide local intelligence regarding employer needs to the full workforce system. Their relationships inform program delivery by ensuring that we have up to date and accurate information on the skills, experience, and credentials desired by local employers. This information is combined with labor market data to for knowledge of real-time and future demand. As such, Talent staff focus their efforts on assisting job seekers with accessing relevant

employment and training opportunities. Training staff focus their relationship-building and program development efforts on training programs that will prepare workers for the careers of today and the future.

There are several organizations across the Upper Peninsula that work in partnership with UPWARD Talent Council and each other in various networks. Some agencies cover the entire expanse of the UP, which include but are not limited to the following: Upper Peninsula Economic Development Alliance, Small Business Development Center, Procurement Technical Assistance Center, Michigan Manufacturing Technology Center, Northern Initiatives, Michigan Rehabilitation Services, Great Lakes Recovery Centers, Invest UP, Operation Action UP, The Community Foundation of the UP, Upper Peninsula Construction and Labor Management Council, UP Healthcare Roundtable, and the Michigan Economic Development Corporation.

In addition, many sub-regional agencies provide services to businesses at a local (single or small group of counties) level. There are numerous economic development entities, including Delta County EDA, Keweenaw EDA, Marquette EDA, Luce County EDC, Mackinac County EDC, Soo EDA, Schoolcraft Commerce Partnership, the Munising Bay Partnership and many more local economic development organizations. Other partners include planning and regional development, chambers of commerce, training providers, adult education programs, returning citizen service providers, partners who serve individuals with disabilities, veterans' service providers, Goodwill industries, Salvation Army, St. Vincent de Paul and many more.

Staff Providing Wagner-Peyser Services

UPWARD Talent Council Michigan Works! staff are fully integrated and administer all programs – Wagner-Peyser, WIOA, PATH, TAA, etc. Each location has at least one Talent, Training and Employer staff member assigned to administer W-P services, either full-time or part-time depending on region assigned.

The UPWARD Talent Council also has available a mobile training unit with computer stations and telephone capabilities that can be deployed across the region. If deployed, staff from various locations join to administer services in remote locations.

Unemployment Insurance Work Test

The State of Michigan's Unemployment Agency requires unemployment insurance claimants to complete an ES registration, an active searchable profile on Michigan Talent Connect, along with the completion and activation of a resume. Claimants may enter the registration at any location that can access the Michigan Talent Connect. If a claimant chooses to enter the ES registration at a location other than at Michigan Works! Service Centers, the claimant must still come to a location designated in the UPWARD Talent Council's ES Plan and have the registration verified. Michigan Works! will view and verify that the claimant's resume is in the Michigan Talent Connect before certifying claimant's registration.

If the claimant(s) did not create a resume in the Michigan Works! Service Center(s), and/or have not yet completed the Michigan Talent Connect Confidential Information page, they will be

required to fill in the required confidential information to access their resume on the Talent Connect. When the Michigan Talent Connect Confidential Information page is completed, registration will be created for the claimants in the OSMIS. This will ensure that any subsequent services that the claimants receive can be reported correctly in OSMIS. Michigan Works! is responsible for verifying that the resume is in the Talent Connect.

After verifying the ES registration, Michigan Works! will validate the verification form and electronically log the name and social security number of each claimant after ES registration has been verified into the One Stop Management Information System.

If it comes to the attention of the MWA that a UIA claimant is in violation of work test requirements, the MWA must report the non-compliance to UIA through the Michigan Web Account Manager (MiWAM) system.

Reemployment Service Eligibility Assessment

UIA selects claimants each week to report to an MWA Service Center to complete the Reemployment Services and Eligibility Assessment (RESEA) program. UPWARD Talent Council Michigan Works! will work with claimants to identify opportunities for positive career changes. The goal is to assist claimants by providing customized services, resulting with claimants returning to work as quickly as possible.

Only people referred from the UIA may receive services through the RESEA program.

First Appointment

The UIA will send the claimant a letter stating they must contact their local MWA by the date posted on the letter to schedule a RESEA appointment. When a UIA claimant contacts a service center to schedule a RESEA appointment, the staff will determine the status of the customer's OSMIS registration and take appropriate action.

After the OSMIS registration is verified, the RESEA scheduling information will be completed (date, time, MWA location) for the RESEA. The appointment must be scheduled by the date that appears on the letter, and held within 21 days of the "Letter Sent Date." A claimant is **allowed to reschedule** their first RESEA appointment, just **once**, within the 21 days from the "Letter Sent Date." The appointment must be rescheduled prior to originally scheduled date/time.

UPWARD Talent Council encourages our staff to gauge claimant's interest in enhanced services provided in the second RESEA appointment during the initial RESEA appointment.

Second Appointment

If our staff and the claimant agree they would benefit from a second RESEA appointment, then one should be scheduled the same day of the successfully completed first RESEA, and within five to ten days from their first RESEA appointment. Claimants are **allowed to reschedule** the second RESEA appointment, just **once**, within five days from the second RESEA appointment.

RESEA Appointment Activities

A claimant may not be excused from participating in any RESEA activity or service.

All RESEA services and activities must be documented in the OSMIS within 48 hours, including scheduling/rescheduling RESEA appointments, failure to attend, or completion of a RESEA.

If the claimant does not contact our Service Center or the claimant contacts us after the date in his/her letter, the OSMIS will not create a RESEA activity and automatically sends the claimant's information back to UIA with a result code of "No Contact." The weekly claimants' report will reflect the "No Contact" in the record status column. This will occur 24 days after the "Letter Sent Date."

Discovering that a claimant may be unable to work, unavailable to work, has refused any offers of work, or is not seeking work, must be reported in the OSMIS within 48 hours.

Our UPWARD Talent Council Michigan Works! Service Centers will deliver all the RESEA activities listed below for each RESEA appointment, unless otherwise noted:

- Orientation to the MWA Services (First RESEA Only).
- Confirmation of active profile on Pure Michigan Talent Connect.
- Assessment of UIA Eligibility.
 - This component must be delivered in a one-on-one setting. The claimant must complete the UIA Eligibility Assessment questionnaire to evaluate his/her eligibility for an UIA benefits review. Answering "No" to any questions 1 through 3 or "Yes" to any questions 4 through 6 indicates an eligibility issue and must be reported to the UIA in determinations; this is the responsibility of the UIA.
- Verification of the Monthly Record of Work Search Form (#1583).
 - Letter #6360 states the claimant must bring Form #1583 to the RESEA appointment for review, however, the on-line submission of this form is also acceptable for review.
- Development of an Individual Employment Plan (IEP).
 - Complete Individual Employment Plan in a one-on-one setting.
- Review of specific Labor Market Information.
- Provision of at least two hours of Reemployment Services.
 - These services may be provided the same day or within 30 days of the RESEA appointment.

Reporting Requirements

All reporting, minus the outcome of the reemployment service, must be entered in the OSMIS within 48 hours of the service or outcome. When the reemployment service is completed, or there is an indication a claimant is unable, unavailable, or has refused any job offers of suitable work, our staff will report this into the OSMIS.

National Labor Exchange System

The UPWARD Talent Council's Michigan Works! Service Center System will participate in the Michigan Component of the labor exchange system by providing access to Michigan's Talent Connect and receiving and forwarding certain interstate and intrastate job orders designated to State of Michigan Talent Investment Agency staff for processing.

Services to Veterans

All UPWARD Michigan Works! Staff are required to attempt to identify veterans and eligible spouses at each point of entry by encouraging them to self-identify. Self-attestation is sufficient

for identification as a veteran or eligible spouse for this identification and referral. (To choose Veteran status for a program registration a DD214 is required.)

As part of implementing Priority of Service for veterans and eligible spouses, it is the responsibility of the UPWARD Talent Council's Michigan Works! Staff to identify veterans and eligible spouses at each point of entry in our Service Centers. At a minimum, this may be accomplished by encouraging veterans and eligible spouses to self-identify. Staff will also ask customers if they are a veteran or an eligible spouse.

Our Michigan Works! staff will formally refer veterans or eligible spouses to a VCA while continuing to provide them with the appropriate services and programs in accordance with the requirements of Priority of Service. All customers who self-identify as veterans or eligible spouses must immediately be notified by our staff that they may be qualified to receive additional services from a VCA. This notification must include all of the following:

- As a veteran or eligible spouse, the customer is entitled to receive Priority of Service,
- As a veteran or eligible spouse, the customer may be eligible to receive additional personalized employment services from a VCA,
- VCA services are in addition to other One-Stop services

Provide the Military Service Questionnaire

If a veteran or eligible spouse customer is interested in pursuing VCA services, our staff will immediately provide the customer with a copy of the Military Service Questionnaire. If not, we will continue to provide the customer with all other appropriate services and programs as with any other customer, and in accordance with the requirements of Priority of Service.

When the Military Service Questionnaire is provided to the customer, we will notify the customer of the following:

- The information is being requested on a voluntary basis,
- Completing the form is a requirement for VCA staff services,
- The information will be kept confidential,
- Refusal to provide the information will not subject the customer to any adverse treatment, but may not be eligible for VCA services,
- The information will be used only in accordance with the law,
- Were to return the completed form.

Review the Military Service Questionnaire

Our staff will immediately review all completed Military Service Questionnaires received to determine qualification to receive VCA services. This determination will be made by reviewing the instructions provided on the form.

Once this determination is made, our staff who reviewed the questionnaire must complete the "For Staff Use Only" section of the Military Service Questionnaire:

- Enter "Reviewing Staff Member" data.
- Enter "Customer OSMIS ID" data.
- Enter "Referred to:" name of VCA receiving the referral.

Once this determination is made, our staff who reviewed the questionnaire must complete the “For Staff Use Only” section of the Military Service Questionnaire.

All customers referred to a VCA are required to have an active Wagner-Peyser registration in the OSMIS. If it is necessary to create a registration, the registration will be done by our staff. Our staff will enter the service “Referral to Veterans Career Advisor” in OSMIS, in addition to any other services provided.

Our staff will notify the VCA of the referral and provide the customer’s Military Service Questionnaire to the VCA no later than 2 business days with the referral meeting veteran qualifications.

Non-Qualifying Customers for VCA Services

For customers who are determined not to be qualified to receive VCA services, Our staff will inform the customer they do not qualify to receive VCA services and continue to provide the customer with all other appropriate services and programs as with any other customer, and in accordance with the requirements of Priority of Service. The Military Service Questionnaires will be kept on file per the requirements of the ES Manual for non-qualifying veterans.

Services Provided to Migrant and Seasonal Farm Workers (MSFWs)

Each local service center will offer Migrant and Seasonal Farm Workers (MSFWs) the same facilitated services that are offered to non-MSFWs, except in cases where staff assisted services are provided to MSFWs only. In providing such services, the UTC Service Center staff shall consider and be sensitive to the preferences, needs and skills of individual MSFWs and the availability of job and training opportunities. When a MSFW applies for ES or is contacted by an Agricultural Employment Specialist the available services will be explained to the MSFW. This explanation of services shall be provided in other languages, if necessary or requested.

Additional Services

In addition to the services described above, persons with disability will all be serviced through an integrated service delivery system. Access to our regional Disability Network organization in addition to procuring computer equipment that will assist in providing accommodations to the disabled are incorporated into the design of our service centers at no cost to the job seeker.

The UPWARD Talent Council will provide Wagner-Peyser endorsed assessments where applicable.

Coordination with Adult Education

Adult Education and Literacy Activities are provided by Adult Education providers in our region. The varying availability of these services across our rural region limits customer access and increases barriers to the services. As the foundation for post-secondary career paths, our board focuses on high school completion. To strengthen adult education services in our region, we need to address barriers/silos to break down the barriers. The removal of the barriers and achievement of high school credentials will increase the number of workers being trained and ready for placement in demand industries and occupations.

WIOA provides opportunities for great collaboration between the core programs and reduce duplication of services and align investments in basic skills and postsecondary education at the regional level. Regular meetings between leaders in education, workforce and the business community must occur to share data that crosses institutional boundaries. The UPWARD Talent Council will build on innovation approaches through collaboration, such as contextualized instruction and career pathways to become the systemic delivery system statewide. Increased collaboration will occur not only locally, but at the regional level to align policies and funding between education, workforce and economic development.

Review of Local Applications

UPWARD Talent Council's Workforce Development Board reviews Adult Education local applications to select providers in our region. The UPWARD Talent Council WDB rates and reviews the Adult Education provider's established performance metrics and ensures alignment with the TIA Adult Education program requirements prior to applications being submitted for these funds in our region.

MOUs and IFAs

Memorandums of Understanding (MOUs) with each WIOA required Partner are in place in the region. Executed MOUs are in place for three years and have been submitted to the Talent Investment Agency. Infrastructure Funding Agreements (IFAs) with applicable WIOA required partners in the region have been negotiated and are in place. Executed IFAs and the IFA spreadsheet delineating FTEs and Cost Allocations based on FTEs have been submitted to the Talent Investment Agency. Subsequent IFAs will be evaluated and executed on an annual basis.

Grant Recipient

The UPWARD Talent Council is responsible for the disbursement of grant funds and is the identified grant recipient.

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Awarding Sub-Grants and Contracts

The primary consideration in selecting agencies or organizations to deliver services within an UPWARD Talent Council Michigan Works! area shall be the effectiveness of the agency or organization in delivering comparable or related services based on demonstrated performance, in terms of the likelihood of meeting performance goals, cost, quality of training, and characteristics of participants. The selection of service providers shall be made on a competitive basis to the extent practicable and shall include: A determination of the ability of the service provider to meet program design specifications established by the administrative entity that take into account the purposes and goals of the specific program.

UPWARD Talent Council Michigan Works! will consider faith-based organizations on an equal, nondiscriminatory basis with other groups when deciding to contract with private institutions for welfare services funded by TANF or Food Stamp Programs.

UPWARD Talent Council Michigan Works! will evaluate all relevant information prior to the authorization of any negotiation for participant services. UPWARD Talent Council Michigan Works! will have final approval of Service Provider of Participant Services contract awards.

The local Procurement policy is attached as Attachment 4.

Local Levels of Performance

Performance monitoring processes for all programs and services delivered by UPWARD Talent Council are firmly in place and will be utilized for tracking and scrutinizing performance. Performance is monitored in the OSMIS using the ETA Performance Report tool. Current negotiated performance levers are noted under the Performance Accountability Section of the Local Plan. UPWARD Talent Council Michigan Works! will support local training partners on the Eligible Provider List to assist in successfully reporting outcomes for WIOA Title I participants.

High-Performing Board Strategies

Continuous Improvement

UPWARD Talent Council Michigan Works! service centers are continually evaluated through internal and external feedback, ongoing program development, analysis of performance measures, internal and external monitoring and continuous collaboration with local partners.

Monitoring and oversight at the local level identifies areas of strength and weakness in program operation and is critical in minimizing risk, reducing liability and evaluating program effectiveness. UPWARD Talent Council Michigan Works! formally monitors all program and services. The monitoring review conducts oversight activities to ensure compliance with the terms, conditions, stipulations, deliverables and performance metrics specified in Local, State, and Federal policies and rules. In addition to oversight of activities, internal monitoring provides the opportunity to identify and resolve problems before they impact quality and performance for each individual program.

In addition, the Talent Investment Agency conducts monitoring for programs and services on a predetermined schedule. TIA ensures program and service alignment with Federal and State guidance. Monitoring recommendations from TIA are implemented and improve UPWARD's overall delivery of the service. As required by law, UPWARD Talent Council has a single audit annually, which is conducted by an independent firm.

Within the Upper Peninsula 15-county region, UPWARD has 14 American Job Centers, with 1 as the comprehensive one stop center. At each of these centers, job seekers, are provided opportunity to prepare, obtain, and advance in meaningful employment. Additionally, employers may access services to easily identify skilled workers and capitalize on other available supports for retaining their current workforce.

Allocation of One-Stop Infrastructure Funds

Infrastructure costs of the service centers are allocated to the various funding sources based on the relative benefit received by each funding source.

Roles and Contributions of One-Stop partners

Following state guidance, UPWARD's local board executed Memorandums of Understanding (MOUs) with each of its required One-Stop partners. The MOUs outlined the roles and contributions of each One-Stop Partner. The MOUs will be reviewed and renewed every three years. The infrastructure costs outlined in the Infrastructure Agreements, attached as an addendum to the MOU, were calculated for its required partners based on their proportionate use of the One-Stop delivery centers and relative benefits received. The IFA contributions will be reviewed and renewed annually.

Individual Training Accounts

Individual Training Accounts (ITAs) are provided for WIOA eligible Adult, Dislocated Worker and Youth participants. Using ITA funds, WIOA eligible participants purchase training services from eligible training providers they select in consultation with a career planner. Participants are expected to utilize information such as skills assessments, labor market information/trends, and training providers' performance, and to take an active role in managing their employment future using ITAs. An ITA is limited in cost and duration and must result in employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.

The UPWARD Talent Council Michigan Works! approves or denies approval for training providers according to a standardized and objective process for training providers to be deemed an Eligible Training Provider (ETP), resulting in the training program posted publicly on the Michigan Training Connect. Only training providers deemed eligible may receive WIOA training funds to assist participants.

The local Michigan Training Connect policy is attached as Attachment 5.

Training Service Contracts

There are some circumstances where mechanisms other than ITAs are used to provide training services in the UPWARD Talent Council region. Contracts for training services are provided for On-the-Job Training, Work-Based Training or other employer-based training in the UPWARD region. If deemed necessary, the UPWARD WDB will utilize training contracts for classroom-based training, following TIA's guidelines. UPWARD currently relies on ITAs for classroom training contracts.

Training Service Contracts and Individual Training Accounts Coordination

To best service customers in our region, UPWARD provides training through a combination of ITAs and contracts. This supports placing participants in programs such as Registered Apprenticeships, related training activities (ITA that corresponds directly to an OJT activity), and stackable trainings (certified nursing assistant to patient care technician), which leads to higher skill and higher wage employment upon completion. The provision of training services aligns with the participant's employment and/or training goals outline in their Individual Employment Plan/Individual Service Strategy.

Informed Customer Choice

Participant choice is one of the basic principles of WIOA. Training services, whether accessed by ITAs, or under contract, must be provided in a manner that maximizes informed consumer choice in selecting an eligible training service provider in accordance with the goals and objectives outlined in the participant's individual employment plan. UTC staff assist the participant with career choices; however, the ultimate decision rests with the customer.

Priority consideration shall be given to programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area, as identified by the UTC WDB. Consequently, UPWARD are expected to promote and enable participants to make choices regarding training providers and programs that have the highest likelihood of employment and financial independence. Staff should refrain from expressing preferences in regard to training providers that are not based on performance outcomes and cost. However, in consulting with participants, it is essential that participants have a viable financial plan in place, whether they wish to select a public or private provider. The selection of training areas should also be guided by the occupations in demand as issued by the UPWARD Talent Council. Training in areas not referenced as in-demand must be accompanied by alternate documentation of demand and/or placement commitments from employers.

Local Planning Process

The local plan was created by UPWARD Talent Council (UPWARD) based on current relationships and collaborations. All plans – regional and local are shared with community stakeholders for their comments, suggestions, etc. through our website (upmichiganworks.org) and established relationships, primarily UPWARD's board and advisory board members. Our Local Elected Official, Workforce Development Board, and Career Educational Advisory Council (CEAC) are comprised of local elected officials, employers, education partners, labor organizations and other community partners may review, comment and approve the plan, and any subsequent modifications. Additionally, other community partners and members of the public may comment through an open comment period of a minimum of 30-days. The review and comment process will be followed in the event of future modifications and any comments that represent disagreement with future modification of our plans will be forwarded to the Talent Investment Agency (TIA).

Technology Integration

UPWARD Talent Council staff enter case management information i.e. case notes, activities, Individual Employment Plans/Individual Service Strategies, employment and training outcomes into the One-Stop Management Information System (OSMIS) for all WIOA programs, PATH, TAA, Wagner-Peyser and other integrated programs. Staff utilize the report and tracking tools in the OSMIS to enhance case management tasks.

UPWARD uses Launchpad, a Salesforce platform, to record services to employer customers. This system allows use to track multiple aspects of our services, including: recruitment, job postings, job fills, hiring events, retention visits and referrals made to partner organizations. The platform is currently only used by Employer Specialists, but UPWARD plans to integrate the technology into case management services for Training and Talent Specialists. The integration of Salesforce will replace the initial customer intake systems of MadB (Marquette, Delta, Dickinson, Menominee, Schoolcraft, Alger counties), Google Forms (Houghton, Baraga, Gogebic, Ontonagon, Iron counties), and Handwritten Notes (Luce, Chippewa, Mackinac counties). The integration of Salesforce into all programs administered will streamline case management services and better align with WIOA's demand-driven model.

UPWARD continually assesses its technology and software platforms to better integrate OSMIS, customer tracking, employer services and assessment tools.

Priority of Service

UPWARD Talent Council adopted a policy prioritizing career and training services to individuals served. Priority of Service is applied when the number of eligible participants who are seeking training exceeds the availability of funding for training. Consistent with the Job for Veterans Act of 2002, veterans and eligible spouses who meet the eligibility criteria for the program receive first consideration. After veterans and eligible spouses, priority for individualized career and training services must be given to recipients of public assistance, other low-income individuals, and/or individuals who are basic skills deficient.

Priority levels are:

- First, to veterans and eligible spouses who are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient.
- Second, to non-veteran eligible adults who are recipients of public assistance, other low-income individuals or individuals who are basic skills deficient.
- Third, to eligible veterans or eligible spouses who are not low income, not public assistance recipients or who are not basic skills deficient and meet the Housing and Urban Development Self-Sufficiency Guidelines adopted by the UPWARD Talent Council.
- Fourth, to non-veterans who are not low income, not public assistance recipients or who are not basic skills deficient and meet the Housing and Urban Development Self-Sufficiency Guidelines adopted by the UPWARD Talent Council.

The local Priority of Service policy is attached as Attachment 6.

Rapid Response

Coordination of Workforce Activities with Statewide Rapid Response

UPWARD Talent Council implements statewide Rapid Response activities, in coordination with the state, to assist employers and impacted workers as quickly as possible following the announcement of a permanent closure, mass layoff, or natural or other disaster resulting in a mass job dislocation. Rapid Response activities are generally triggered by the filing of a Worker Adjustment and Retraining Notification (WARN) or notice of Trade Adjustment Assistance (TAA) petition with the state.

Rapid Response Indicators

The UPWARD Talent Council monitors media reports and uses a network – internal and external of local contacts to identify downsizing and plant closings that warrant a Rapid Response. Employer Specialist, assigned to specific counties in the Upper Peninsula, work closely with regional economic development agencies and other partners as part of its early warning system. Employer Specialists maintain ongoing contact with companies and are often the first to hear of a pending closure or layoff. All UPWARD staff have made it a practice to notify the Director of Workforce Services immediately upon learning of any forthcoming worker dislocation in their assigned territory, whether or not a Worker Adjustment Retraining Notification (WARN) notice is required.

State Adjustment Grants (SAGs)

State Adjustment Grants are additional funding allocations to meet documented funding deficits. SAGs are requested if circumstances in our region warrant. UPWARD Talent Council Michigan Works! will continuously monitor expenditures and obligations of WIOA Dislocated Worker funds and seek out additional funds as necessary following Talent Investment Agency Policy. UPWARD considers several factors prior to requesting the funds including, but not limited to, levels or percentage of local dislocated worker formula funding expended and regional unemployment, size of an actual or potential dislocation event and the time period between local dislocation events.

Joint Adjustment Committees (JACs)

Joint Adjustment Committees are supported by both the Michigan Talent Investment Agency and UPWARD Talent Council. UPWARD will consider JACs has an option for serving affected workers, whether salaried, hourly, union, or non-union (including temporary staff) in mass layoff and plant closing situations involving 50 or more full-time workers; and, where at least 60 days remain before layoff activity substantially commences, if all parties (employer and union, if applicable are agreeable to the establishment of one.

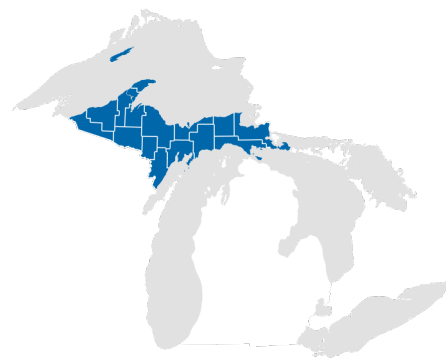
The individual responsible for Joint Adjustment Committees (JACs), State Adjustment Grants (SAGs), and National Dislocated Worker Grants (NDWGs) is:

Director of Workforce Services
2950 College Avenue
Escanaba, MI 49829
mwjob@isupward.org
(906) 789-9732

The local Rapid Response policy is attached as Attachment 7.

HOT JOBS

UPPER PENINSULA



Alger • Baraga • Chippewa • Delta • Dickinson • Gogebic • Houghton • Iron • Keweenaw • Luce • Mackinac • Marquette • Menominee • Ontonagon • Schoolcraft

Demand Occupations	Wage Range	Projected Growth 2014-2024	Projected Annual Job Openings	Education and Training Beyond High School
Accountants and Auditors	\$20- 31	7.4%	20	Bachelor's degree, license
Automotive Body and Related Repairers	\$13- 20	7.7%	8	Long-term OJT
Bus & Truck Mechanics & Diesel Engine Specialists	\$14- 20	11.1%	9	Long-term OJT
Civil Engineers	\$31- 40	6.1%	6	Bachelor's degree, license
Electrical Power-Line Installers and Repairers	\$29- 43*	31.1%	32	Long-term OJT
Electricians	\$24- 29	3.3%	11	Apprenticeship, license
Financial Managers	\$36- 58	5.6%	10	Bachelor's degree
Healthcare Social Workers	\$20- 26	5.7%	5	Master's degree, license
Heating, A/C, and Refrigeration Mechanics and Installers	\$14- 28	7.9%	5	Postsec. nondegree award, license
Industrial Machinery Mechanics	\$17- 35	6.9%	16	Long-term OJT
Insurance Sales Agents	\$25- 45	11.7%	21	Moderate-term OJT, license
Machinists	\$16- 22	14.1%	29	Long-term OJT
Market Research Analysts & Marketing Specialists	\$15- 26	21.0%	11	Bachelor's degree
Mechanical Engineers	\$25- 36	10.9%	9	Bachelor's degree, license
Medical and Clinical Laboratory Technologists	\$22- 29	7.3%	7	Bachelor's degree
Medical and Health Services Managers	\$32- 45	4.8%	16	Bachelor's degree
Physical Therapists	\$34- 46	17.5%	9	Doctoral or prof. degree, license
Physicians and Surgeons	\$92- 100+	4.3%	7	Doctoral or prof. degree, license
Plumbers, Pipefitters, and Steamfitters	\$18- 27	3.7%	7	Apprenticeship, license
Public Relations Specialists	\$17- 34	12.1%	4	Bachelor's degree
Purchasing Agents, exc. Wholesale, Retail & Farm.	\$19- 28	5.0%	7	Bachelor's degree
Registered Nurses	\$24- 32	7.3%	93	Bachelor's degree, license
Sales Representatives, Wholesale and Manufacturing	\$14- 33	3.7%	22	Moderate-term OJT
Speech-Language Pathologists	\$29- 37	5.7%	5	Master's degree, license
Welders, Cutters, Solderers, and Brazers	\$13- 19	2.9%	17	Moderate-term OJT

How we make this list

This list includes occupations that show a favorable mix of projected long-term job growth, projected annual job openings, and median wages. It does not necessarily reflect current hiring demand.

All occupations require education or training beyond high school and have a median hourly wage above the regional median wage. Hourly wage range represents the 25th to 75th percentiles. OJT = On-the-Job Training.

Source: Michigan DTMB, Bureau of Labor Market Information and Strategic Initiatives

*Regional wages unavailable; Statewide wage data shown.



TOP JOBS BY EDUCATION

Most jobs that pay a desirable wage require some type of formal education or training after high school. The purpose of this tool is to help identify these medium- to high-paying, in-demand jobs in your region as well as the relevant training for these positions. It is important to explore the various postsecondary education and training programs at community colleges, universities, and reputable training institutions in your region and across Michigan. Filling out the FAFSA (Free Application for Federal Student Aid) is a great first step in identifying sources of funding to pursue postsecondary education.

Middle-Skill Jobs

Job title

Electrical Power-Line Installers and Repairers

Insurance Sales Agents

Industrial Machinery Mechanics

Machinists

Computer-Controlled Machine Tool Operators

Bachelor's Degree or Higher

Job title

Financial Managers

Mechanical Engineers

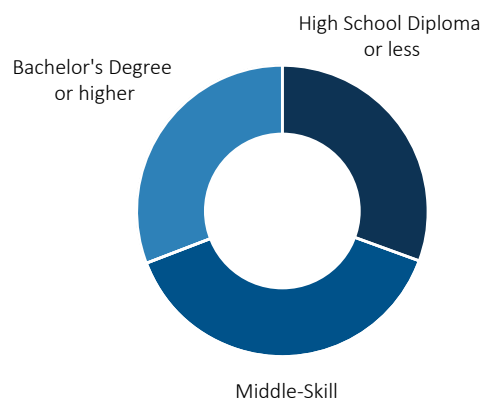
Medical and Health Services Managers

Physical Therapists

Registered Nurses

In-Demand Jobs by Education

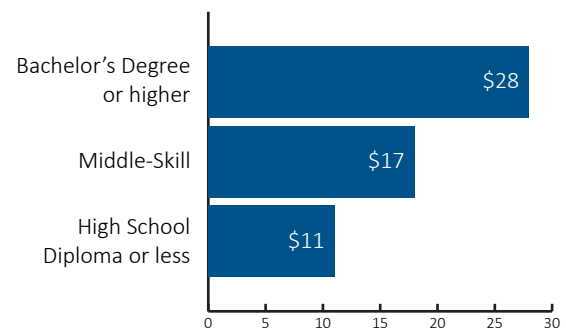
The donut chart below shows the breakdown of real-time job advertisements in the region grouped by required education level. This data is a snapshot of job advertisements posted online.



Source: Conference Board Help Wanted Online data series

Wages by Education

The bar chart below shows the median wage of occupations broken down by the required level of education. It shows that there is a strong correlation between high levels of education and higher median wages.



Source: DTMB, LMIS, Occupational Employment Statistics 2016

Middle-skill jobs are those that require education or training beyond high school but less than a Bachelor's degree.



LOCAL POLICY:

ADDITIONAL ASSISTANCE LIMITATION POLICY

Date:	November 08, 2017
To:	Workforce Services Team
From:	Director of Policy and Compliance
Subject:	WIOA Youth Program Additional Assistance Limitation Definition
Programs Affected:	WIOA-Youth
References:	WIOA Section 129 (a)(3)(B) WIOA Section 129(a)(1)(C)(iv)(VII) WIOA Manual

BACKGROUND

UPWARD Talent Council Michigan Works! must define and establish documentation requirements for Additional Assistance.

POLICY

Additional assistance shall be defined as an individual who meets one or more of the following:

- History of School Truancy
- Lack of Stable Employment History
- Family or Personal Substance Abuse History
- One or More Parents Currently Incarcerated
- Emancipated Youth
- Emotional, Medical or Psychological Problems

Documentation requirements will include a case note in the OSMIS outlining the applicable Additional Assistance category and the participant's situation related to the Additional Assistance. The participant must also provide supporting documentation verifying the barrier.

INQUIRIES

Inquiries regarding this policy are to be directed to your supervisor.



LOCAL POLICY:

SUPPORTIVE SERVICES

Date:	July 01, 2018
To:	All Staff
From:	Director of Policy and Compliance
Subject:	Supportive Services
Programs Affected:	WIOA – Adult, Dislocated Worker and Youth, PATH, TAA
References:	Trade Adjustment Assistance (TAA) Manual Issued December 29, 2016, Partnership. Accountability. Training. Hope. (PATH) Program Manual November 17, 2014, Workforce Innovation and Opportunity Act (WIOA) Manual Issued January 29, 2018

BACKGROUND

Supportive services provide eligible participants career and training supportive services based on documented financial assessment, individual circumstances, the absence of other resources and established funding limits. This policy establishes UPWARD Talent Council's additional parameters for allowable supportive services for each funding source.

POLICY

I. Supportive Services

a. Conditions

Supportive services are provided on the basis of documented financial assessment, individual circumstances, the absence of other resources and funding limits. All considerations for the approval of a supportive service must be entered into the OSMIS in the *Case Note*, *Supportive Service* and *ISS/IEP* fields.

b. Amounts

All staff shall adhere to the established limitations for the provision of supportive services per funding source. Any supportive service that will exceed the amount listed on the attached chart must have authorization to exceed the listed amount by an UPWARD Talent Council designee.

c. Duration

Supportive services are provided to enable an individual to participate in the WIOA/TAA/PATH activities. For WIOA Youth, supportive services may also be provided to participants as a follow-up service.

d. Documentation Provisions

All supporting documentation of each provided supportive service must be placed in the participant's file and case notes. The participant's identified barrier/outcome must be documented in the participant's IEP/ISS.

e. Resource and Service Coordination

Supportive services are provided in the absence of other resources and funding limits. To ensure resource and services coordination, staff must reference OSMIS *Supportive Service* fields, *Case Notes* and refer with partner agencies prior to providing an individual a supportive service.

f. Regulatory Limits

If UPWARD Talent Council local policy does not address supportive services for a specific program or funding stream, then the staff will abide by the limits and conditions set forth in TIA policy or applicable regulation.

II. Purchase of Other Items

a. Other Work-Related Expenses

Other work-related expenses may be approved by UPWARD Talent Council that enable an individual to obtain and retain employment including, but not limited to, professional license fees (auto trade certification, etc.), professional tools, business start-up expenses. These purchases must be a one-time/non-continuing work-related expense.

b. Other Items

To purchase items or other services not outlined in this policy, a proposal must be sent to a Workforce Service Manager for review. The proposal must include justification for the requirement of the supportive service, provision impact for the participant, employability benefit and the absence of other resource.

III. Non-Allowable Supportive Service Items

UPWARD Talent Council, including but not limited to federal statute, deems the following items unallowable supportive services under any circumstances.

1. Rental payments not associated with moving expenses
2. Childcare payments
3. Late fees or fines
4. Legal costs and/or fees
5. Organizational dues
6. Utility bills
7. Mortgage payments
8. Television and internet fees

9. Past-due bills
10. Established car payments
11. Credit card or other loan payments
12. Building supplies for capital improvements
13. Jewelry
14. Any item that is not directly related to obtaining and/or retaining employment and/or training

The attached document outlines the types of supportive services, required documentation for pre-approval, approval and submittal for payment, applicable limitations and notes and maximum payments.

IV. Procurement and Documentation

All supportive service purchases must abide by UPWARD Talent Council's procurement procedures. This includes making purchases in compliance with the "Buy American Act" which states that only American-made equipment or products should be purchased with funds made available under WIOA Title I or II or under the Wagner-Peyser Act.

The requirement for cost estimates can be waived if acquiring the estimates will result in excessive costs or burdens and does not exceed funding sources cost limitations. For example, towing a vehicle to multiple service centers for repair estimates. Staff must always document the rationale for lack of cost estimates in case notes or other case file documentation.

V. Accounting Procedures

All staff must adhere to generally accepted accounting principles and sound internal-control practices when procuring and disbursing supportive services. All procedures safeguard against waste, fraud and abuse.

Supportive services disbursements not adhering to the limits and practices presented in this policy will be disallowed by UPWARD Talent Council.

INQUIRIES

Inquiries regarding this policy are to be directed to your supervisor.

Attachment A

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Clothing	<ul style="list-style-type: none"> • Pre-authorization form • Proof of work, bona fide job interview, enrollment into training, or participation in PATH or other employment-related activities at Michigan Works! Service Centers • Computer print-out of ISS/IEP that includes hours of work per week and wage, or information on job interview, training, or participation in PATH or other employment-related activities at Michigan Works! Service Centers; identified barrier to be removed and outcome of the provision of this service 	<ul style="list-style-type: none"> • Service Certificate • Vendor billing • Pre-authorization form • Proof of work, bona fide job interview, enrollment into training, or participation in PATH or other employment-related activities at Michigan Works! Service Centers • Computer print-out of completed ISS/IEP 	<ul style="list-style-type: none"> • Clothing can only be work related and/or training related and/or relating to participation in assigned activities (PATH) at Michigan Works! Service Centers 	<ul style="list-style-type: none"> • \$100 per 12-month period for WIOA • \$300 per 12-month period for PATH 	<ul style="list-style-type: none"> • Participant MUST be enrolled in OSMIS • Supportive service must be entered in OSMIS • Case Note that includes the cost of and the vendor used

Attachment B

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Mileage Reimbursement	<ul style="list-style-type: none"> • Pre-authorization form • Transportation/Mileage Log signed by staff • Proof of work, bona fide job interview, enrollment into training, or participation in assigned (PATH) activities at Michigan Works! Service Centers • Computer print-out of ISS/IEP that includes hours of work per week and wage, or information on job interview, training or participation in assigned (PATH) activities at Michigan Works! Service Centers; identified barrier to be removed and outcome of the provision of this service 	<ul style="list-style-type: none"> • Service Certificate • Pre-authorization form • Verified Transportation Log • Proof of work, bona fide job interview, enrollment into training, or participation in assigned (PATH) activities at Michigan Works! Service Centers • Computer print-out of completed ISS/IEP 	<ul style="list-style-type: none"> • Job site transportation is limited to three months for PATH/WIOA 	<ul style="list-style-type: none"> • \$75 per month for WIOA • \$150 per month for PATH • Participants will be reimbursed at \$.40/mile for PATH and the Federal Mileage Reimbursement rate for TAA/WIOA • This limit applies to mileage reimbursement and advanced mileage payment combined • Amounts are not to be rounded up 	<ul style="list-style-type: none"> • Transportation/Mileage Log forms are available in the Policy Drive • Volunteer drivers will be reimbursed at the State rate and must be listed with a community organization as a volunteer driver • Participant MUST be enrolled in OSMIS • Supportive service must be entered in OSMIS • Case Note that includes the cost and the vendor used

Attachment C

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Advance Mileage Payment	<ul style="list-style-type: none"> • Pre-authorization form • Transportation/Mileage Documentation (i.e. Google Maps, MapQuest) • Proof of work, bona fide job interview, enrollment into training, or participation in assigned PATH activities at Michigan Works! Service Centers • Computer print-out of ISS/IEP that includes hours of work per week and wage, or information on job interview, training or participation in assigned (PATH) activities at Michigan Works! Service Centers; identified barrier to be removed and outcome of the provision of this service 	<ul style="list-style-type: none"> • Service Certificate • Pre-authorization form • Verified Transportation/Mileage Documentation (i.e. Google Maps, MapQuest) • Proof of work, bona fide job interview, enrollment into training, or participation in assigned (PATH) activities at Michigan Works! Service Centers • Computer print-out of completed ISS/IEP 	<ul style="list-style-type: none"> • Advance payment for volunteer services is not allowed • Advanced travel payments are allowed for job interviews only when there is verification from an employer that an interview is taking place; that the Participant is a valid candidate for the job; and that the position will meet program performance requirements • Job site transportation is limited to three months 	<ul style="list-style-type: none"> • \$75 per month for WIOA • \$150 per month for PATH • Participants will be reimbursed at \$.40/mile for PATH and the Federal Mileage Reimbursement rate for TAA/WIOA • These Limits apply to mileage reimbursement and advanced mileage payment combined 	<ul style="list-style-type: none"> • Transportation/Mileage Log forms are available in the Policy Drive • Participant MUST be enrolled in OSMIS • Supportive service must be entered in OSMIS • Case Note that includes the cost and the vendor used

Attachment D

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Bicycle Purchase	<ul style="list-style-type: none"> • Pre-authorization form • Proof of work, bona fide job interview, enrollment into training, or participation in assigned (PATH) activities at Michigan Works! Service Centers • Computer print-out of ISS/IEP that includes hours of work per week and wage, or information on job interview, training, or participation in assigned (PATH) activities at Michigan Works! Service Centers; identified barrier to be removed and outcome of the provision of this service 	<ul style="list-style-type: none"> • Service Certificate • Vendor billing • Pre-authorization form • Proof of work, bona fide job interview, enrollment into training, or participation in assigned (PATH) activities at Michigan Works! Service Centers • Computer print-out of completed ISS/IEP 	<ul style="list-style-type: none"> • This service is a one-time lifetime service 	<ul style="list-style-type: none"> • \$150 per Participant per lifetime for WIOA and PATH Participants 	<ul style="list-style-type: none"> • Participant MUST be enrolled in OSMIS • Supportive service must be entered in OSMIS • Case Note that includes the cost and the vendor used

Attachment E

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Auto Purchase	<ul style="list-style-type: none"> • Pre-authorization form • A copy of the proposed purchase agreement that lists the Participant as the purchaser, including any costs incurred by the Participant. Also, to include costs of title, registration, and plates • N.A.D.A. appraisals showing each vehicle is worth at least \$2000 retail • Copy of Participant's valid Driver's License • Vehicle inspection by licensed mechanic • Copy of Participant's valid car insurance • Proof of work • Computer print-out of ISS/IEP that includes hours of work per week and wage; identified barrier to be removed and outcome of the provision of this service • Financial management budget outline 	<ul style="list-style-type: none"> • Service Certificate • Vendor billing • Pre-authorization form • A copy of the proposed purchase agreement that lists the Participant as the purchaser, including any costs incurred by the Participant. Also, to include costs of title, registration, and plates • N.A.D.A. appraisals showing each vehicle is worth at least \$2000 retail • Copy of Participant's valid Driver's License • Vehicle inspection by licensed mechanic • Copy of Participant's valid car insurance • Proof of work • Computer print-out of completed ISS or IEP 	<ul style="list-style-type: none"> • *Participant must have verified and retained employment for at least 30 working days AND must have no other means of getting to and from work. (Note exception in Notes section) • Auto must be purchased from a licensed auto dealer • Auto Purchase is a one-time lifetime service 	<ul style="list-style-type: none"> • Cost of the vehicle to Michigan Works! UPWARD Talent Council must not exceed \$2000 for PATH only 	<ul style="list-style-type: none"> • * In instances where a PATH Participant may be in danger of losing employment, an exception may be made based on a submitted rationale and approval by UPWARD Talent Council. • Participant MUST be enrolled in OSMIS • Supportive Service must be entered in OSMIS • Case Note that includes the cost and the vendor used

Attachment F

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Public Transportation	<ul style="list-style-type: none"> • Pre-authorization form • Proof of work, bona fide job interview, enrollment into training, or participation in assigned activities (PATH) at Michigan Works! Service Centers • Computer print-out of ISS/IEP that includes hours of work per week and wage, or information on job interview, training, or participation in assigned activities (PATH) at Michigan Works! Service Centers; identified barrier to be removed and outcome of the provision of this service • <i>Note: Participant must sign for receipt of bus tokens</i> 	<ul style="list-style-type: none"> • Service Certificate • Pre-authorization form • Participant must sign for receipt of bus tokens • Taxi Service and Bus Tokens Billing: may be one billing with multiple Participants listed. See Note below. • Proof of work, bona fide job interview, enrollment into training, or participation in assigned activities (PATH) at Michigan Works! Service Centers • Computer print-out of completed ISS/IEP 	<ul style="list-style-type: none"> • This Supportive service is intended to remove immediate barriers that prevent individual from participating in PATH activities, training, and employment. It is not intended for the provision of long-term support. • Job site reimbursement is limited to three months 	<ul style="list-style-type: none"> • Not to exceed \$150 per month per Participant for WIOA and PATH 	<ul style="list-style-type: none"> • Consideration is to be given to the length of time and projected costs per individual to utilized public transportation • Participant MUST be enrolled in OSMIS • Supportive service must be entered in OSMIS • Case Note that includes the cost and the vendor used

Note: When submitting payment for **taxi billing or bus tokens**, **only one Service Certificate needs to be written**. The Service Certificate back-up will include a corresponding spreadsheet (Public Transportation Voucher in the Policy Drive) that has all the names of the Participants listed as well as the funding source and dollar amounts. An ISS/IEP must also be attached that indicates the need and justification of the provision of service. The ISS/IEPs should be attached in the order of Participant's names as they appear on the bill. Failure to do so will result in the Service Certificate being returned to the Service Center Staff without payment.

Attachment G

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Auto Repair	<ul style="list-style-type: none"> • Pre-authorization form • N.A.D.A. appraisals demonstrating the vehicle is worth at least \$2000 retail • Copy of Participant's valid Driver's License • Copy of Participant's valid car insurance • Copy of vehicle title (proof of ownership) • Copy of vehicle registration • Proof of work, enrollment into training, or participation in assigned activities (PATH) at Michigan Works! Service Centers • Computer print-out of ISS/IEP that includes hours of work per week and wage, or information on training or participation in assigned activities (PATH) at Michigan Works! Service Centers; identified barrier to be removed and outcome of the provision of this service 	<ul style="list-style-type: none"> • Service Certificate • Vendor billing • Pre-authorization form • N.A.D.A. appraisals demonstrating the vehicle is worth at least \$2000 retail • Copy of Participant's valid Driver's License • Copy of Participant's valid car insurance • Copy of vehicle title (proof of ownership) • Copy of vehicle registration • Proof of work, enrollment into training, or participation in assigned activities (PATH) at Michigan Works! Service Centers • Computer print-out of completed ISS/ IEP 	<ul style="list-style-type: none"> • A licensed mechanic must do all repairs • The Participant must own the vehicle and it must be registered and insured in the Participant's name 	<ul style="list-style-type: none"> • Cost of automobile repair is limited to \$900 maximum every 12 months for PATH and \$200 lifetime maximum for WIOA Participants • Some authorized mechanics use a diagnostic computer and charge for this type of estimate. If such an estimate occurs, the cost will count towards the total allowable limit of the auto repair 	<ul style="list-style-type: none"> • Consideration is to be given to the contribution to be made by the Participant based on a review of the Participant's changing financial conditions, i.e. recent employment. This must be documented and placed into the Participant's file. • The repair is expected to make the vehicle safe and roadworthy • Participant MUST be enrolled in OSMIS • Supportive service must be entered in OSMIS • Case Note that includes the cost and the vendor used

Attachment H

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Auto Insurance	<ul style="list-style-type: none"> • Pre-authorization form • Copy of Participant's valid Driver's License • Copy of vehicle title (proof of ownership) • Copy of vehicle registration • Proof of work or enrollment into training • Computer print-out of ISS/IEP that includes hours of work per week and wage, or information on training; identified barrier to be removed and outcome of the provision of this service 	<ul style="list-style-type: none"> • Service Certificate • Vendor billing • Pre-authorization form • Copy of Participant's valid Driver's License • Copy of vehicle title (proof of ownership) • Copy of vehicle registration • Proof of work or enrollment into training • Computer print-out of completed ISS/IEP 	<ul style="list-style-type: none"> • Auto insurance is limited to Public Liability and Property Damage (PLPD) coverage only. No fees, memberships, etc. will be paid. 	<ul style="list-style-type: none"> • Three months maximum one-time lifetime coverage within reasonable and customary charges for WIOA Participants and three months maximum one-time lifetime coverage for PATH Participants, not to exceed \$300 	<ul style="list-style-type: none"> • Quotes must be specific, including such information as detailed description of coverage for Participant/Vehicle, dates of coverage, etc. • Participant MUST be enrolled in OSMIS • Supportive Service must be entered in OSMIS • Case Note that includes the cost and the vendor used

Attachment I

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Moving Expenses	<ul style="list-style-type: none"> • Pre-authorization form • Required documentation to support each service • Bona fide employment and wage documentation • Computer print-out of ISS/IEP that includes hours of work per week and wage; identified barrier to be removed and outcome of the provision of this service 	<ul style="list-style-type: none"> • Service Certificate • Vendor billing • Pre-authorization form • Required documentation to support each service • Bona fide employment and wage documentation • Computer print-out of completed ISS/IEP 	<ul style="list-style-type: none"> • Verified employment and wage documentation must meet program performance requirements and provide an individual or family sustaining wage • The relocation distance must be a minimum of 50 miles • Allowable Expenses include: <ul style="list-style-type: none"> ○ Relocation expenses ○ Trailer and/or truck rental ○ Rental of moving equipment ○ Compensation for assistance by professional moving agencies. ○ One-way mileage allowance ○ First month's rent 	<ul style="list-style-type: none"> • One-time lifetime maximum payment of \$500 for WIOA AND \$1500 for PATH Participants 	<ul style="list-style-type: none"> • Participant MUST be enrolled in OSMIS • Supportive service must be entered in OSMIS • Case Note that includes the cost and the vendor used

Attachment J

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Medical Services	<ul style="list-style-type: none"> • Pre-authorization form that includes estimated cost and a description of the service • Proof of work, pre-employment, or enrollment into training • Computer print-out of ISS/IEP that includes hours of work per week and wage, or information on pre-employment or training; identified barrier to be removed and outcome of the provision of this service 	<ul style="list-style-type: none"> • Service Certificate • Vendor billing • Pre-authorization form that includes estimated cost and a description of the service • Proof of work, pre-employment, or enrollment into training • Computer print-out of completed ISS/IEP 	<ul style="list-style-type: none"> • UPWARD Talent Council will NOT pay for missed appointments. It is the Participant's responsibility to contact their health care professional to reschedule when necessary • Allowable expenses include but are not limited to: <ul style="list-style-type: none"> ○ General or Medical Physical Examinations ○ Immunizations ○ Tests ○ Counseling directed toward strengthening an individual's self-worth and family relationships, increasing/improving social interaction and ability to function in the workplace • Payment is to be made at the medical provider's usual customary or reasonable fee not to exceed the maximum payments AND when demonstrated by Participant and documented that the procedure/product IS NOT covered under Medicaid or other health care insurance. • Dental repair costs can only be used after Medicaid payments have been applied. Any dental work must be pre-approved by UPWARD Talent Council. Submissions for approval must contain a medical description of the repair, along with estimated cost, and a description of how this will improve the Participant's ability to enter employment. 	<ul style="list-style-type: none"> • A maximum lifetime allowance of \$400 for dental repair for WIOA and PATH • A maximum lifetime allowance of \$200 for all other allowable expenses for WIOA and PATH 	<ul style="list-style-type: none"> • Participant MUST be enrolled in OSMIS • Supportive service must be entered in OSMIS • Case Note that includes the cost and the vendor used

Attachment K

Type	Items for Pre-Approval	Items for Approval and Payment	Limitations	Maximum Payments	Notes
Other Work-Related Expenses	<ul style="list-style-type: none"> • Pre-authorization form • Bona fide verification of employment • Verification by employer if purchase is necessary for performance of job duties • Computer print-out of ISS/IEP that includes hours of work per week and wage; identified barrier to be removed and outcome of the provision of this service 	<ul style="list-style-type: none"> • Service Certificate • Vendor billing • Pre-authorization form • Bona fide verification of employment • Verification by employer if purchase is necessary for performance of job duties • Computer print-out of completed ISS/IEP 	<ul style="list-style-type: none"> • Allowable expenses include, but are not necessarily limited to: <ul style="list-style-type: none"> ○ License fees ○ Trade certificates ○ Professional tools ○ Items deemed necessary to enhance or maintain the employability potential of a Participant ○ Driver's License (one quote from Secretary of State) 	<ul style="list-style-type: none"> • A maximum lifetime allowance of \$500 for WIOA and PATH participants 	<ul style="list-style-type: none"> • Participant MUST be enrolled in OSMIS • Supportive Service must be entered in OSMIS • Case Note that includes the cost and the vendor used



LOCAL POLICY: PROCUREMENTS

Issue Date:	September 11, 2017
To:	Service Center System
From:	Director of Policy and Compliance
Subject:	Procurements
Programs Affected:	ALL
Purpose:	Guidance for purchasing and procuring
References:	Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Rule Title 2 of the Code of Federal Regulations, 2 CFR 200, as well as the Workforce Innovation and Opportunity Act (WIOA – Public Law 113-128).

BACKGROUND

All procurements utilizing funds received from the Talent Investment Agency (TIA) must comply with applicable Code of Federal Regulations, Title 2 – Grants, and Talent Investment Agency guidelines for procurement.

This policy covers all procurements including acquisitions of equipment, building space or related facilities, services and supplies, and the selection of service providers. This policy also applies for procurement for repair, maintenance, accounting, audit services, legal, bookkeeping, printing, insurance, consultant/consulting and other services required for administration and overall operation.

This policy reinstates the uniform administrative requirements for the procurement of equipment, supplies, and/or services utilizing any TIA funding source. In addition, it clarifies the requirement for prior approval of procurements in excess of the TIA simplified acquisition threshold of \$150,000.

POLICY

I. Authorization

A. *Service Providers of Participant Services*

The primary consideration in selecting agencies or organizations to deliver services within an UPWARD Talent Council Michigan Works! area shall be the effectiveness of the agency or organization in delivering comparable or related services based on demonstrated performance, in terms of the likelihood of meeting performance goals, cost, quality of training, and characteristics of participants. The selection of service providers shall be made on a competitive basis to the extent practicable, and shall include: A determination of the ability of the service provider to meet program design specifications established by the administrative entity that take into account the purposes and goals of the specific program. All procurement procedures within this policy apply to the selection of service providers.

UPWARD Talent Council Michigan Works! will consider faith based organizations on an equal, nondiscriminatory basis with other groups when deciding to contract with private institutions for welfare services funded by TANF or Food Stamp Programs.

UPWARD Talent Council Michigan Works! will evaluate all relevant information prior to the authorization of any negotiation for participant services. UPWARD Talent Council Michigan Works! will have final approval of Service Provider of Participant Services contract awards.

All Other Procurements

All procurements not classified as Service Providers of Participant Services will be established based upon need and fund availability. Such procurements will be under the authority of the UPWARD Talent Council Michigan Works! system. All procurements will be conducted in a manner that is practical and in compliance with both Federal and State mandates. The procurement files shall be fully documented and approved by the Chief Executive Officer of UPWARD Talent Council Michigan Works!

Procurement of capital assets (equipment, buildings, and land) and capital improvements (cost of improvements to capital assets that materially increase their value or useful life) require special treatment. With limited exceptions, the construction or purchase of buildings and the purchase of land is not allowed in

whole or in part under federal grants except in the following situations:

- (1) To meet obligations to provide physical and reasonable accommodations as required by the ADA of 1990 (as amended) and 504 of the Rehabilitation Act of 1973 (as amended).
- (2) To fund repairs, alterations and capital improvements of JTPA owned property which has been transferred to WIA Title I programs.
- (3) To fund repairs, alterations and capital improvements of Job Corps facilities required for the proper administration of WIA
- (4) To fund repairs, renovations, alterations and capital improvements of SESA real property, identified at WIA Section 193.

Regardless of the amount, prior TIA approval is required for all procurements (including capital leases) for the construction or purchase of buildings and land that is to be made in whole or in part with funds administered by TIA.

- Trade Adjustment Assistance funds can only be used to procure real property if approved in advance by the TIA/USDOL.
- TANF funds may not be used to construct or purchase buildings.
- Repairs and alterations are considered current operating costs and are allowable.

II Ethical Standard

Written standards of conduct that are in compliance with the federal and state regulations are required for employees engaged in the selection, award, and administration of contracts. At a minimum, the written standards of conduct will be disseminated to all appropriate parties engaged in the selection, award, and administration of contracts and add address: [2 CFR Part 200.318(c); WIOA Section 101(f) and 107(h)]

A. Conflict of Interest

No individual in a decision-making capacity, (including a Board member; MWA/Service provider, official, employee, or agent; local elected official; chief elected official; or agent), any committee, sub-committee, steering committee, volunteer or intern, shall participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict would arise when any of the following has a financial or other interest in the firm selected for the award:

- The employee, officer, or agent
- Any member of his or her immediate family
- His or her partner
- An organization, which employs, or is about to employ, any of the above.
- An organization in which any of the above has a financial interest pertaining to the award

When the employee or immediate family member holds financial interest in blind trust, there will be no conflict of interest, provided that the blind trust has been disclosed to the organization governing procurement ethics.

Whenever the employee discovers, or becomes aware, of such an actual or potential conflict, he/she should promptly withdraw from the procurement, or seek guidance on participation from the Chief Executive Officer of the UPWARD Talent Council Michigan Works!

Any person involved with the procurement who has or obtains any benefit from any contract with a business in which he/she has a financial interest must report this to the appropriate official or group, except when the interest has been placed in a disclosed blind trust.

Immediate family member is defined as wife, husband, son, daughter, mother, father, brother, brother-in-law, stepbrother, sister, sister-in-law, stepsister, son-in-law, daughter-in-law, mother-in-law, father-in-law, aunt, uncle, niece, nephew, grandparents, stepparent, stepchild, and grandchild.

B. *Gratuities and Kickbacks*

It is a breach of ethical standards for anyone to offer, give or agree to give, any employee, former employee, Michigan Works member, Michigan Works Board member, officer or agent or for an employee, former employee, Michigan Works member, Michigan Works Board member, officer or agent to accept from another person, a gratuity, favors, anything of monetary value, or an offer of employment in connection with any aspect of a procurement.

It is a breach of ethical standards for any payment, gratuity, or offer of employment to be made by, or on behalf of, a subcontractor under a contract to the prime contractor or higher tier subcontractor, or any person associated with these, as an inducement of the award of a subcontract.

C. *Contingent Fees*

It is a breach of ethical standards for anyone to be retained, or to retain anyone, to solicit or secure a contract for a commission, brokerage or contingent fee or the promise of such payments. This prohibition does not apply to the hiring of bona fide employees of an organization, or to retaining a bona fide commercial selling organization.

D. *Confidential Information*

It is a breach of ethical standards for any employee, former employee, Michigan Works member, Michigan Works Board member, officer, or agent to use

confidential information for actual or anticipated personal gain, or for the actual or anticipated personal gain of any other person.

E. Fairness and Impartiality

Everyone involved in the procurement process should be fair to all offerors and contractors. In the event where a reviewer is so opposed to an offeror before he or she goes into the review and that reviewer cannot rise above this feeling, then the reviewer should withdraw from the review group.

F. UPWARD Talent Council Michigan Works! Board Members, Local Elected Officials and Chief Elected Officials Conflict of Interest

No member of either board and no local elected officials and chief elected officials shall cast a vote on, or participate in, any decision-making capacity or the provision of services by that member (or any organization which that member directly represents) or on any matter which would provide direct financial benefit to that member.

G. Sanctions and Remedies for Breach/Violation of Code of Conduct Standards

Administrative remedies against non-employees:

1. The first violation may result in a written warning outlining violation and request for suspension of said activity.
2. The second violation may result in a written reprimand indicating violation and resultant debarment/suspension if activity continues.
3. The third violation may result in debarment or suspension from being a committee member of the Board or subcontractor. (For Board members: An affirmative vote of 51% of the Board members present at a meeting in which there is a quorum and all members have been provided a notice of the meeting which specifies the proposed removal.)

Administrative remedies against employees:

1. The first violation may result in an oral or written warning.
2. The second violation may result in a written reprimand.
3. The third violation may result in suspension, with or without pay for specified periods of time; and possible termination from employment.

Due Process:

All procedures under this policy shall be in accordance with due process requirements. Notice and opportunity for a hearing shall be provided prior to imposition of any suspension or termination of employment.

III. Procurement Methods

Except as otherwise authorized by applicable Federal law, UPWARD Talent Council Michigan Works! shall conduct all procurement transactions in a manner that provides for open and free competition.

In selecting service deliverers, UPWARD Talent Council Michigan Works! offers proper consideration to community based organizations with programs of demonstrated effectiveness in the delivery of employment and training services (20 CFR 627.422(e)). Consideration shall be given to making use of appropriate services currently available in the community with or without reimbursement, which the UPWARD Talent Council Michigan Works! has determined to be effective. The purpose of this consideration shall be to avoid duplication and to obtain such services at a cost saving over establishing another such service or activity. To foster greater economy and efficiency, when appropriate, state and local intergovernmental agreements or inter-entity agreements will be entered for procurement or use of common or shared goods and services.

Small, minority, and women owned business shall be included as potential bidders to the greatest extent possible. Affirmative steps this MWA takes to ensure that small businesses, minority-owned firms, women's business enterprises, and labor surplus area firms are used when possible includes:

- Placing qualified small, minority and women's businesses on solicitation lists;
- Assuring that small, minority and women's businesses are solicited whenever they are potential sources;
- Dividing total requirements when economically feasible into smaller tasks or quantities to permit maximum participation by small, minority, and women's businesses;
- Establishing delivery schedules where the requirements permit, which encourage participation by small, minority, and women's businesses;
- Using the services and assistance of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
- Requiring the prime contractor, if subcontracts are to be let, to take the same affirmative steps.

Open competitive procurement practices seeking to obtain the most satisfactory product or service at the most reasonable cost shall be employed. Wide participation on the part of all vendors is encouraged. All procurement transactions, regardless of dollar amount, will be conducted in a manner that provides open and free competition.

Before determining which procurement method is appropriate for the identified need, the following must be taken into consideration:

- The total value of the procurement. For example:
 - A two-year contract at \$80,000 per year with the option for a third year is a procurement valued at \$240,000.
 - An item costs \$140,000, but delivery, set-up, and other ancillary charges for the purchase are another \$20,000. The total value of the procurement is \$160,000.
 - The procurement value of computers, phone systems, network devices, etc. will include the cost of application and system software to make the items usable for the purpose in which it is being purchased.
- Procurements cannot be separated into multiple processes or purchases unless it is documented that the multiple processes resulted in a more economical purchase.
- Rebates, trade-ins, sale proceeds, etc. may be used to reduce the cost of the new purchase.

UPWARD Talent Council Michigan Works! will utilize one of the following five methods for procurement of goods and/or services:

- Micro-Purchases
- Small Purchases
- Sealed Bids
- Competitive Proposals
- Noncompetitive Proposals

Regardless of the method of procurement utilized, a review of proposed procurements will be completed to avoid a purchase of unnecessary or duplicative items. Once proposed procurement is deemed reasonable and necessary, bids/quotes will be solicited from a minimum of three sources; two quotes are sufficient if the value of the procurement does not exceed \$25,000. UPWARD Talent Council Michigan Works! will seek to the extent practical products/services that adhere to environmental conservation and energy efficiencies, and dimensioned in the metric system of measurement. Consideration will also be given to consolidating or breaking out procurements to obtain a more economical purchase. When appropriate, an analysis will also be made of lease versus purchase alternatives, and any other analysis to determine the most economical approach and cost reasonableness for both small and large purchases. It's also encouraged to use federal or state excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

All procurements will be implemented in a manner to ensure fair and open competition. In order to ensure that unfair requirements are not placed on procurement procedures, the following situations that are considered restrictive of competition shall be avoided:

- Placing unreasonable or overly restrictive requirements on firms or

- organizations in order for them to qualify to do business;
 - Requiring unnecessary experience and/or excessive bonding;
- Noncompetitive pricing practices between firms or organizations or between affiliated companies or organizations;
 - Noncompetitive awards to consultants that are on retainer contracts;
 - Awards that would create organizational conflicts of interest;
- Specifying brand name products instead of allowing a similar product of equal quality and describing the performance of other relevant requirements of the procurement;
 - Overly restrictive specifications;
- In-state or local geographical preference in the evaluation of bids or proposals; and
 - Any arbitrary action in the procurement process.

When the value of the item being purchased exceeds \$10,000 (or the aggregate value in the fiscal year exceeds \$10,000), an affirmative procurement program must be established to procure items that contain the highest percentage practical of Environmental Protection Agency identified recovered materials. A satisfactory level of competition must be maintained. [2 CFR 200.322]

For procurements of \$25,000 or more, UPWARD Talent Council Michigan Works! will verify procurements do not result in an award to any party which is debarred or suspended or is otherwise excluded from or ineligible for participation in federal assistance programs. Verification will be accomplished by either checking if the party is excluded on the federal System for Award Management (SAM) website, collection a certification from the party, or adding a clause to the contract or grant.

UPWARD Talent Council Michigan Works! will be in compliance with the “Buy American Act” (41 U.S.C. 8301-8303) in which only American-made equipment and products should be purchased with funds made available under WIOA Title I or II or under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) [WIOA Section 502]

A. *Micro Purchase*

Procurement by micro-purchase is the acquisition of supplies or services when the aggregate dollar amount does not exceed \$3,000 (or \$2,000 in the case the acquisitions for construction subject to the Davis-Bacon Act). To the extent practical, micro-purchases are to be distributed equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotes if the price is considered to be reasonable. [2 CFR Part 200.320(a)]

Planned reoccurring services such as payroll, accounting, lawn care, janitorial, etc. are not viewed as separate purchases each time the service is rendered. Therefore, if the aggregate value of the individual purchased service exceeds

\$3,000 in a 12-month period, the micro-purchase method cannot be used.

B. *Small Purchases*

A simplified informal method for securing standardized services, supplies, or other property that does not cost more than the TIA simplified acquisition threshold of \$150,000 [2 CFR Part 200.320(b)]. This method is appropriate when price is the overriding factor and may be easily quoted and compared, delivery is standardized, and performance outcomes are not dependent upon the content of the goods or services being procured. Price comparisons will be accomplished either through phone verification or website/catalog price from a minimum of three qualified sources; two quotes are sufficient if the value of the procurement does not exceed \$25,000. All prices will be documented in written form and dated. Price quotes must be viable, in that the purchase may be made for the price quoted.

Subsequent purchases of goods and/or services under this method of procurement will follow the UPWARD Talent Council Michigan Works' Purchase Order System. An Invitation for Bid, Request for Proposal, or Request for Quotations will be utilized when appropriate and a Bidder's list information will be utilized. Prices should be in writing, but may be obtained by phone quotes or by supply item website or catalog when appropriate. The UPWARD Talent Council Michigan Works' Purchase Order System will be followed for purchases resulting from this method of procurement.

This method may be used to consolidate, into a single process, the procurement of frequently needed standardized items such as office supplies and clothing supportive services. The time period cannot exceed five years and the total costs during the time period cannot exceed the TIA simplified acquisition threshold of \$150,000. If actual costs exceed the dollar threshold originally procured, a new procurement process must be conducted.

Quotes in excess of the TIA simplified purchase threshold of \$150,000 are not usable quotes in meeting the requirements of this method. If an adequate number of quotes cannot be obtained, this method cannot be used.

C. *Sealed Bids*

Bids are publicly solicited and a firm fixed price contract (either 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 price. Sealed bid is the preferred method for procuring construction [2 CFR Part 200.320(c)]. In order for this process to be feasible, all of the following conditions must be met:

- A complete, adequate, and realistic specification or purchase description

is available and used in the solicitation [2 CFR Part 200.320(c)(1)(i)]

- Two or more responsible bidders are willing and able to compete effectively for the business [2 CFR Part 200.320(c)(1)(ii)]
- 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. [2 CFR Part 200.320(c)(1)(iii)]

If sealed bids are used, all of the following requirements apply:

- An independent estimate of the cost/price is made prior to receiving bids [2 CFR Part 200.323(a)]
- The Invitation for Bid (IFB) is publicly advertised and bids must be solicited from an adequate number of known suppliers, providing them sufficient time prior to the date set for opening the bids [2 CFR Part 200.320(c)(2)(i)]
- The IFB contains all specifications and pertinent attachments and defines the items or services to be procured in sufficient detail for the bidders to properly respond [2 CFR Part 200.320(c)(2)(ii)]
- All bids are publicly opened at the time and place prescribed in the IFB [2 CFR Part 200.320(c)(2)(iii)]
- A firm fixed price contract 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 must 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. [2 CFR Part 200.320(c)(2)(iv)]
- Any or all bids may be rejected if there is a sound documented reason. [2 CFR Part 200.320(c)(2)(v)]

D. Competitive Proposals

Competitive proposals are used when there is more than one prospective bidder, the lowest price is not necessarily the determining factor for award, and either a fixed price or cost reimbursement agreement will be awarded. The competitive proposal is appropriate when evaluation factors focus on approach, program design and outcomes, innovation, coordination, and experience, in addition to price. [2CPR Part 200.320(d)]

The following requirements apply to competitive proposals:

- An independent estimate of the cost/price prior to receiving proposals [2 CFR Part 200.323(a)]
- Request for Proposals (RFP) must be publicized. RFPs must contain the specifications that provide a common understanding for the proposed goods or services and identify all the evaluation factors and their relative importance or weight in selection of successful bidders. Any response to publicized RFPs must be considered to the maximum extent practical. [2 CFR Part 200.320(d)(1)]
- Proposals will be solicited from an adequate number of qualified sources [2 CFR Part 200.320(d)(2)]
- A written method for conducting technical evaluations of proposals received and for selecting recipients. [2 CFR Part 200.320(d)(3)]
- Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program based on price and other evaluation factors. [2 CFR Part 200.320(d)(4)]
- Competitive proposal procedures may be used for qualifications-based procurement of architectural/engineering professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. [2 CFR Part 200.320(d)(5)]

E. Noncompetitive Proposals

Procurement by noncompetitive proposals is the solicitation of a proposal from only a single source, or the solicitation of a proposal from more than one source and competition is determined to be inadequate to fulfill the requirements of the funding agency. [2 CFR Part 200.320(f)]

Noncompetitive proposals are considered last resort option and used only when there is a documented reason for sole source selection. Procurement process must still be open and fair. This method may only be used when the procurement is not practical using one of the four other methods and one of the

following circumstances applies:

- The item or service is only available from a single source [2 CFR Part 200.320(f)(1)];
- The public exigency or emergency need for the item or service does not permit a delay resulting from competitive solicitation; [2 CFR Part 200.320(f)(2)] A public emergency must meet one of the following criteria:
 - Necessary for the imminent protection of public health.
 - Emergency repairs to protect life or property.
 - Unforeseen crisis requiring immediate procurement.
- The federal awarding agency or TIA expressly authorized noncompetitive proposals in response to a written request [2 CFR Part 200.320(f)(3)]
- After solicitation of a number of sources, competition is determined inadequate. This usually occurs after a competitive process has been used and there are insufficient bidders. [2 CFR Part 200.320(f)(4)]

As with all procurement transactions, a cost analysis is required for all noncompetitive procurement actions. This entails verification of the proposed cost data and evaluation of the specific elements of costs and profits, including comparison with the independent price estimate.

Prior approval is required for all sole-source awards in excess of the TIA simplified acquisition threshold of \$150,000 when Sealed Bids or Competitive Proposals were not used. [2 CFR Part 200.324(b)(2)]

Approval requests are to include a description or specifications of the item to be purchased, the independent cost estimate, purpose of the proposed purchase, cost and/or price analysis, an explanation on why another procurement method is not viable, and supporting documentation as to how the purchase meets one of the conditions described above. Requests must be submitted to:

Talent Investment Agency
 Executive Office
 Victor Office Center
 201 North Washington Square
 Lansing, MI 48913

Solicitations will minimally contain the following:

- A clear and accurate description of the technical requirements for the goods and services to be procured. The description shall not contain features that restrict competition;

- All the requirements the bidders must fulfill and all other factors to be used in evaluating bids or proposals.
- A description, whenever applicable, of technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.
- The specific features of “brand name or equal” descriptions that bidders are required to meet when such items are included in the solicitations.
- Description of the requirements for time, place, and methods or performance of services.
- The acceptance, to the extent practicable and economically feasible, of products and services dimensioned in the metric system of measurement.
- Preference, to the extent practicable and economically feasible, for products and services that conserve natural resources and protect the environment and are energy efficient.
- Contract clauses that will be included in any resulting contract (UPWARD Talent Council Michigan Works! will use value engineering clauses in contracts that deal with construction projects of sufficient size to provide an increase in cost savings);
- Certifications, assurances, and representations;
- Instruction on how to prepare and submit the technical and cost/price proposals;
- Evaluation factors for award; and
- Solicitation provisions.

UPWARD Talent Council Michigan Works! will maintain mailing lists of potential providers. RFPs will be mailed to all parties on the mailing list at the time of issuance. RFPs will also be mailed to any party responding to the public notice. Parties responding to the public notice will be asked if they wish to be included in the mailing list. UPWARD Talent Council Michigan Works! shall periodically review and update its bidder's list information.

Statutorily or administratively imposed in State or local geographical preference will not be a factor in proposal evaluation, except in those cases where applicable Federal status expressly mandate or encourage geographic preference.

Under formula grants awarded to state and administered by TIA, the procurement of all equipment, capital improvements, and other capital expenditures in excess of the TIA simplified acquisition threshold of \$150,000 are subject for approval by TIA.

Discretionary grants and other non-formula grants administered by TIA may have lower thresholds for which prior TIA and/or federal awarding agency approval is required. Lacking specific guidance, approval from the federal awarding agency is required for capital expenditures, including equipment, of \$5,000 or more.

UPWARD Talent Council Michigan Works! will request approval with a minimum of the following applicable information:

1. A description of the proposed capital improvement or equipment to be procured.
2. How the item will benefit the MWA's program(s) for which it is being purchased.
3. An independent estimate of the expected cost/price of the item.
4. A copy of the solicitation that will be used for the procurement.
5. Bidder's list and how the solicitation will be publicized.

The information will be submitted to:

Talent Investment Agency
Executive Office
Victor Office Center
201 North Washington Square
Lansing, Michigan 48913

All necessary approvals must be obtained and documented prior to initiating the purchase.

Bonding requirements for construction or facility improvement contracts/subcontracts exceeding the TIA simplified acquisition threshold of \$150,000 must be imposed to ensure the interests of the federal funds are protected. [2 CFR Part 200.325]

IV. Source Selection Procedures

For procurement other than participant services, the involvement of the RFP/Contract Committee will be by exception and based upon the scope and magnitude of the procurement requirement. In all procurements, the UPWARD Talent Council Michigan Works' CEO/COO approval must be received prior to the obligation of any funds.

The factors that will be considered in evaluating proposals will be tailored to each acquisition and will include only those factors that will have an impact on the source selection decision. The RFP will clearly state the evaluation factors to be considered and their relative importance. Such factors may include the following:

- Technical Approach or Methodology
- Qualifications of Personnel
- Experience of the Offeror
- Facilities/Equipment
- Management and Administration
- Understanding the Requirements

- Program Design
- Budget Considerations
- Completeness of Training

Other factors may be considered where appropriate.

UPWARD Talent Council Michigan Works! will utilize the Adjectival Rating Approach. Each reviewer will award an adjectival judgment to the section of the proposal being reviewed. The descriptive adjectives will be converted to a numeric score. The following adjectives and definitions will apply:

Excellent: The factor being evaluated is completely and thoroughly responsive to the requirements in the RFP. The offeror demonstrates a comprehensive knowledge of the RFP section and in every case explains how all requirements of the RFP will be met. The offeror demonstrates the highest degree of competency and knowledge of the requirement. The proposal meets and exceeds all specifications required and the probability of contractor success is high. The factor in the proposal is clear, unambiguous, and directly addresses the needs of the agency.

Very Good: The proposal is fully responsive to the requirements of the RFP as it relates to this factor. The offeror exhibits a substantial understanding of the requirement. The offeror demonstrates a strong knowledge of the RFP and explains how conditions of the contract will be met. The proposal meets and routinely exceeds the specifications stipulated in the RFP. The proposal is clear, but a few minor imperfections and errors detract from the totality of the proposal.

Good: The proposal is responsive to the minimum requirements of the RFP factor. The offeror exhibits a basic understanding of the requirements specified in the RFP. The proposal occasionally exceeds the specifications and in many cases the offeror demonstrates how the conditions of the contract will be met. This proposal is clearly written, but several minor imperfections and informalities need to be addressed.

Fair: The proposal is responsive to the essential, but not all the basic requirements of the RFP section. In only a few cases does the offeror indicate through examples how the conditions of the contract will be met. The proposal clearly meets most of the conditions of the contract, but some areas/elements of this evaluation factor are ambiguous and unclear. The proposal will require substantial negotiations to ensure success of the contractor based upon this evaluation factor.

Poor: The proposal does not respond to the majority of the basic requirements of the RFP section. In only a few cases does the proposal reflect a basic understanding of the requirements. A substantial amount of work requiring a significant amount of time would be required to bring this portion of the proposal to a minimum level of acceptability.

Unacceptable: The proposal meets only a very few of the basic requirements of the RFP. The offeror evidences only a minimum understanding of the requirement. Even extensive negotiations and clarifications would not bring this proposal to an acceptable level.

Each assigned reviewer will be given copies of the Proposal Rating Sheets for the evaluation of proposals. These evaluations of proposals must be completed independently prior to the evaluation team meeting to discuss the ratings. Additional rounds of scoring may occur after clarifications have been made by the evaluation team. The adjectival ratings are converted to numbers at the completion of each round of review. This will be done by the appropriate staff of the UPWARD Talent Council Michigan Works! utilizing the Matrix of Ratings and Summary of Ratings forms. The conversion factors given for each adjectival rating are as follows:

Excellent	1.0
Very Good	0.8
Good	0.6
Fair	0.4
Poor	0.2
Unacceptable	0.0

The normal threshold required to consider a proposal for negotiation is 75 percent of the total points available. This threshold may be adjusted if in the best interest of the UPWARD Talent Council Michigan Works. The UPWARD Talent Council Michigan Works! will proceed with negotiations with those proposers who meet the threshold level. The UPWARD Talent Council Michigan Works! will schedule negotiation meetings with the proposer representatives within 14 days of the Michigan Works approval. Letters will be sent to proposers providing advance notice pointing out technical deficiencies, questions regarding cost/price data, and other clarification that may be requested concerning the proposals. The information included in these letters need not be inclusive of all items to be discussed at the negotiation meeting. Negotiation may involve best and final proposal requests and evaluation at the discretion of the review team and RFP/Contract Committee.

Negotiations will be directed to resolve all the terms and conditions of the proposed contract. Any new or changed UPWARD Talent Council Michigan Works policies! will be presented. Any questions by the Contractor will be entertained. All terms and conditions will be agreed upon; all ambiguities are fully clarified.

Negotiation will result in the best buy of services being procured. Award of a contract will be to a source whose offer, price and other factors considered, will be most advantageous to the UPWARD Talent Council Michigan Works.

In the event only one source responds, the proposal must be reasonably acceptable. At that point, definitive negotiations leading to contract award would be held.

Prior to the contract award, a cost or price analysis is required for every procurement action, including contract modifications.

Price Analysis is the process of examining and evaluating a price without looking at individual elements of cost. The focus is the “bottom-line” price. The method and degree of the analysis depends on the particular procurement and pricing situation. Price analysis shall be used when price reasonableness can be established on the basis of the catalog or market price of a product or is based on prices set by law or regulation.

Cost Analysis will be used to establish the basis for negotiation of contract prices where price competition is not adequate or is lacking altogether, and where price analysis, by itself, does not ensure the reasonableness of prices. Cost analysis will review and evaluate element by element, the cost estimate supporting a company’s proposal for the purpose of pricing a contract. This review will include analysis and evaluation of (1) the supporting data submitted by the offeror, (2) the cost elements, and (3) the factors the offeror considered in projecting from that data to develop the estimate of the cost to perform the specified work. Cost analysis will also include the determination of allocability of the proposed costs. Allocability is measured by the following standards:

- Necessity
- Reasonableness
- Allocability
- Terms of the contract
- Cost principles
- Funding Source regulations/policies

The general approach to analyzing proposed costs will include:

- Insurance of non-duplication
- Checking computations
- Reviewing for completeness of information
- Reviewing for proper categorization
- Determining the estimating basis
- Determining the allowability of the estimate
- Determination that excess program income and excess profit are not present
- Cost/price analysis will be documented

For cases where a cost analysis is necessary and there is inadequate price competition, a certification will be required by the offeror that the cost data are accurate, current, and

complete at the time of agreement. Awards or modifications negotiated in reliance on such data provides the MWA a right to a price adjustment and exclude any significant sum by which the price increased when it can be demonstrated that the awardee knowingly submitted data that was not accurate, complete, or current as certified.

V. Partner Organizations

If two or more organizations plan to share responsibility for carrying out the main work of the grant, then those organizations may partner as co-grantees or co-subgrantees with one organization being designated as the “lead”. However, each organization will be equally responsible for performance and financial obligations. This relationship need not result in a new legal entity being formed, but some form of a contractual relationship must be documented and submitted that reflects the roles and responsibilities of the parties.

In the alternative, if one organization will be responsible for the overall work of the grant, with other organizations performing separate and distinct functions to serve or aid that principal effort, then such other organizations must be procured as subcontractors or subgrantees. Other organizations cannot be identified in a bid or proposal unless they were competitively procured for the intended purpose prior to the submission of the bid/proposal. To do so would jeopardize full and open competition. If a bid or proposal is submitted that identifies other organizations, documentation must be provided that the identified parties were properly procured or the bid/proposal must be rejected.

VI. Third-Party Procurements

The Michigan Legislature has authorized two programs in which eligible organizations may utilize third-party procurements:

A. MiDEAL

Authorized under Public Act 431 of 1984, Section 263, MiDEAL allows local units of government in Michigan to use state procured contracts to buy goods and services. For more information please refer to the MiDEAL website at <http://www.michigan.gov/localgov>.

B. REMC Association of Michigan

Authorized under Public Act 451 of 1976, Section 380.671, the REMC Statewide \$AVE (Schools Aggregated Volume in Education) Bid Project allows the following to purchase a variety of supplies, equipment, software, computer, and networking items through its procured vendors.

1. Public, non-public and private schools (K-12, preschools)
2. Community Colleges, Universities and Colleges
3. Public Libraries and Museums (local, county, state)
4. State, County, and Local Government Agencies

For more information on the REMC \$AVE Bid Project please refer to its website at <http://remcbids.org/>.

When using other third-party procurements in place of own procurement process, documentation is required to verify that the procurement met the need and all federal, state, and local procurement standards were followed. This includes being able to document competition was not limited in the original procurement and subsequent purchases. Simply using the same vendor or product a third-party procured will not meet these requirements.

VII. Contractor Responsibility

Prior to contract award, UPWARD Talent Council Michigan Works! should determine whether the prospective contractor is a responsible source. In procurement parlance, responsibility pertains to a prospective contractor's ability and capacity 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. [2 CFR Part 200.318(h)] UPWARD Talent Council Michigan Works may ask the following questions:

- Federal Funds Eligibility Status - Has the contractor filed the required certification that it is not debarred or suspended from receiving federal funds? (29 CFR 98)
- Resources - Does the source have adequate personnel, facilities, and financing to complete the contract? If not, does it have the ability to obtain them? For this question, the evaluator must consider the existing work being performed by the source, as well as the proposed additional work.
- Capability - Does the source have the capability, in terms of skills and experience, to perform the work?
- Integrity and Business Ethics - Does the source have a record of sound integrity and business ethics?
- Organization - Does the source have the management, accounting and business systems necessary to perform the work?
- Past Experience - Does the source have a record of satisfactory past performance?
- Other - Is the source otherwise eligible to receive the award under applicable

laws and regulations?

Selection of Service Providers: The primary consideration in the selection of service providers will be demonstrated performance of the staff to operate the program. Determinations of demonstrated performance shall be in writing and taken into consideration the following:

- Adequate financial resources or the ability to obtain adequate financial resources.
- The ability to meet the program design specifications at a reasonable cost, as well as the ability to meet performance goals.
- A satisfactory record of past performance (in job training, basic skills training, or related activities), including demonstrated quality of training; reasonable dropout rates from past programs; the ability to provide or arrange for appropriate supportive services as specified in the ISS including child care, retention in employment, and earning rates of participants.
- The ability to provide services that can lead to achievement of competency standards for participants with identified deficiencies.
- A satisfactory record of integrity, business ethics, and fiscal accountability.
- The necessary organizational, experience, accounting, and operational controls; and
- Technical skills to perform the work.

For procurement of participant services, the in-house review team will make recommendations to the RFP/Contract Committee. The RFP/Contract Committee will present their recommendation to the full UPWARD Talent Council Michigan Works! Board. The UPWARD Talent Council Michigan Works! Board will be expected to approve moving into the negotiation process and execution of a contract if negotiations can be completed.

Contracting will not occur with debarred, suspended parties, or parties otherwise excluded from or ineligible for participation in Federal assistance programs. Verification is accomplished by:

- Checking if the contractor is excluded on the federal System for Award Management (SAM) website at www.sam.gov.
- Contractors sign a certification stating they are not on the list of parties excluded from federal procurement or non-procurement programs.
- Adding a clause to the contract or grant.

VIII. Contract Type

Cost reimbursement is the preferred method of contracting and is the only method allowable for contracts with state and local governments when reimbursements are made in whole or in part with Workforce Investment Act (WIA) or WIOA funding.

Contracts written for proposers may be considered **high-risk** under certain situations. These situations may include:

- A history of unsatisfactory performance
- Not financially stable
- Has a management system that does not meet the management standards set forth by the Regulations
- Has not conformed to the terms and conditions of a previously awarded grant or sub-grant
- Has not met the negotiation threshold in the evaluation process

Under fixed-price and performance-based contracts, any revenue in excess of actual costs will be treated and reported as program income.

Costs or prices based on estimated costs for contracts under the federal award are allowable only to the extent that costs incurred or cost estimates included in negotiated prices would be allowable for the UPWARD Talent Council Michigan Works under 2 CFR Part 200 Subpart E – Cost Principles.

Cost plus a percentage of cost contracts and percentage of construction cost methods of contracting must not be used.

Value engineering clauses will be used in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions.

Time and material type contracts may be used only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk.

Profit is an allowable cost payable only to commercial organizations. The profit must be separately negotiated from the contract's price and cannot be based on a percentage of costs budgeted or expended in the agreement. Profit must be tied to performance and cannot be paid as a guaranteed fixed fee. Profit is only earned when performance outcomes are attained and can only be disbursed when those outcomes are validated. Profit cannot be paid in addition to performance payments or incentive payments.

Factors to be considered when negotiating profit are the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

Profit rates can be negotiated up to a maximum of ten percent. Profit rates can only be applied against the commercial organization's personnel-related costs for the staff that

contributed to the organization's unique capacity to manage and achieve the performance of the contract.

Under cost reimbursement contracts there is little to no risk to the commercial organization. Therefore, profit is usually not warranted.

IX. Procurement Files

Documentation will be maintained for each step in the procurement process to sufficiently detail the history of the procurement. Procurement files will be maintained by the UPWARD Talent Council Michigan Works. These files may include the following [2 CFR Part 200.318(i)]:

- Rationale for the Method of Procurement
- Project Rationale
- Independent Estimate to set baseline for reasonable costs
- Copy of Public Notice to include dates printed
- Solicitations
- Bidders Listing
- Proposals/Bids Received
- Proposal Rating Sheets for all reviewers
- Matrix of Ratings
- Summary of Ratings
- Cost/Price Analysis
- Justification of Selection
- Profit
- Approvals
- Award Notice

ATTACHMENT I - Vendor Procurement File Checklist - will be completed as applicable and contained within each procurement file.

At a minimum, procurement files will be retained for three years after final disposition of the item procured. If any litigation, audit, or claim is initiated involving the item procured during the three year retention period, the procurement records must be retained until resolution of all issues and final action is taken or until the end of the three year retention period; whichever is later. [2 CFR Part 200.333]

X. Appeal and Protest

All appeals and protests will be handled in accordance with current Federal, State, and local guidelines.

XI. Contract/Lease Requirements

A. Contract Provisions

Sufficient language will be provided in contracts to protect the federal funds and the interests of the parties. Provisions will ensure compliance with all applicable federal, state, and local laws.

At a minimum, contract clauses must be sufficient to address the following as applicable to the contract:

- Contracts in excess of the TIA simplified acquisition threshold must address administrative, contractual or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate;
- All contracts in excess of \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement;
- Equal Employment Opportunity. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of “federally assisted construction contract” in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR Part 60-1.4(b), in accordance with Executive Order 11246, “Equal Employment Opportunity” (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, “Amending Executive Order 11246 Relating to Equal Employment Opportunity,” and implementing regulations at 41 CFR Part 60, “Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor.” [2 CFR Part 200 Appendix II (C)]
- Davis-Bacon Act, as amended (40 U.S.C. 3141-3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, “Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction”). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity

must report all suspected or reported violations to the Federal awarding agency. The contracts must also include a provision for compliance with the Copeland “Anti-Kickback” Act (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, “Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States”). The Act provides that each contractor or subrecipient must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency. [2 CFR Part 200 Appendix II (D)]

- Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-Federal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence. [2 CFR Part 200 Appendix II (E)]
- Rights to Inventions Made Under a Contract or Agreement. If the Federal award meets the definition of “funding agreement” under 37 CFR Part 401.2(a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that “funding agreement,” the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, “Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements,” and any implementing regulations issued by the awarding agency. [2 CFR Part 200 Appendix II (F)]
- Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended—Contracts and subgrants of amounts in excess of \$150,000 must contain a provision that requires

the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA). [2 CFR Part 200 Appendix II (G)]

- Debarment and Suspension (Executive Orders 12549 and 12689)—A contract award (see 2 CFR Part 180.220) must not be made to parties listed on the government-wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR Part 180 that implement Executive Orders 12549 (3 CFR Part 1986 Comp., p. 189) and 12689 (3 CFR Part 1989 Comp., p. 235), “Debarment and Suspension.” SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549. [2 CFR Part 200 Appendix II (H)]
- Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)—Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier, up to the non-Federal award. [2 CFR Part 200 Appendix II (I)]
- A non-Federal entity that is a state agency or agency of a political subdivision of a state and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the EPA at 40 CFR Part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired during the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines. [2 CFR Part 200 Appendix II (J); 2 CFR Part 200.322]
- Other requirements as defined by the federal awarding agency. These include provisions related to program and administrative regulations,

such as:

- a. Compliance with the “Buy American Act.” None of the funds made available under WIOA Title I or II or under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) may be expended by an entity unless the entity agrees that in expending the funds the entity will comply with sections 8301 through 8303 of Title 41, United States Code (commonly known as the “Buy American Act”). [WIOA Section 502]
- b. The awardee agrees to comply with the required financial and compliance audits in accordance with the Single Audit Act of 1984.
- c. Notice of awarding agency requirements and regulations pertaining to reporting.
- d. Access by the grantee, the subgrantee, the Federal grantor agency, the Comptroller General of the United States, or any of their duly authorized representatives to any books, documents, papers, and records of the contractor which are directly pertinent to that specific contract for the purpose of making audit, examination, excerpts, and transcriptions.
- e. Retention of all required records for three years after grantees or subgrantees make final payments and all other pending matters are closed.
- f. Salary and Bonus Limitations: Under Public Law 109-234 and Public Law 111-8, Section 111, none of the funds appropriated in Public Law 111-5 or prior Acts under the heading “Employment and Training” that are available for expenditure on or after June 15, 2006, shall be used by a recipient or sub-recipient of such funds to pay the salary and bonuses of an individual, either as direct costs or indirect costs, at a rate in excess of Executive Level II. The salary and bonus limitation does not apply to vendors providing goods and services.

An example boilerplate for all contracts written by the UPWARD Talent Council Michigan Works for participant services and other procurements should be on hand for Agency use.

B. Leases

Leases are subject to all procurement standards and lease payments must be

allowable under the applicable federal cost principles. Factors such as location, parking, access to public transportation, maintenance, security, telecommunications, and other included services are normally considered when selecting office space and service center locations. Due to this unique and customizable nature, office and building leases typically do not qualify for procurement under the micro-purchase or small purchase methods.

The procurement procedures as outlined previously will be completed prior to any lease agreement being completed. Documentation shall be maintained to support the procurement process and the subsequent transaction. All such procurement will be covered by a written contractual agreement.

A new lease must be procured when an existing lease expires and all of its options have been exhausted. It cannot be renewed, extended, or otherwise amended without the support of an appropriate procurement process. A cost/price analysis for each optional renewal year entered into is needed to ensure that the rental costs are still competitive.

All lease agreements will minimally contain the following:

- The agency or organization name and business address of the lessee and the lessor;
- The signatures of authorized representatives of both the lessee and the lessor;
- The effective dates of the agreement (beginning and ending dates);
- Specific items covered by the agreement, i.e. address of the facility, quantity and description of equipment items, quantity and type of motor vehicles
- Specific maintenance and operating costs which are included or excluded;
- Insurance costs;
- Lease insurance for motor vehicles, if applicable; and
- Conditions for termination of the lease without penalty costs or fees should federal funds become unavailable.

C. *Rent*

Rent must be reasonable in light of such factors as comparable property, market conditions in the area, alternatives available, as well as, type, life expectancy, condition, and value of the leased property. Rental arrangements should be reviewed periodically to determine if circumstances have changed and other options are available. In addition, if there is idle capacity or idle facilities, rent must be reassessed to ensure its allowability under federal programs. [2 CFR Part

200.465(a) and .446]

Use allowance is no longer identified by the federal regulations as an acceptable alternative to depreciation. The depreciation method must be followed when determining allowable rent charged to federal programs. [2 CFR Part 200.436(a), (d)(5) and .443(b)(4)]

The rental of any property owned by an individual or parties affiliated with UPWARD Talent Council Michigan Works, including commercial or residential real estate, for purposes such as home office workspace is unallowable. [2 CFR Part 200.465(c)(6)]

The amount of rent that can be charged to federal programs is further limited under “sale and lease back” arrangements, “less-than-arm’s-length” leases, and capital leases.

1. “Sale and Lease Back” Arrangements

Rental costs under “sale and lease back” arrangements are allowable only up to the amount that would be allowed had the non-Federal entity continued to own the property. This amount would include expenses such as depreciation, maintenance, taxes, and insurance.

2. Less-Than-Arm’s-Length Leases

As with “sale and lease back” arrangements, rental costs under “less-than-arm’s-length” leases are allowable only up to the amount that would be allowed had the non-Federal entity continued to own the property. This would include expenses such as depreciation, maintenance, taxes, and insurance. [2 CFR Part 200.436 and .465(c)]

A “less-than-arm’s-length lease is one under which one party to the lease agreement is able to control or substantially influence the actions of the other. Such leases include, but are not limited to those between:

- Divisions of UPWARD Talent Council Michigan Works! (2 CFR Part 200.436 and .465(c)(1))
- UPWARD Talent Council Michigan Works! under common control through common officers, directors, or members [2 CFR Part 200.436 and .465(c)(2)]
- UPWARD Talent Council Michigan Works! and a director, trustee, officer, or key employee of UPWARD Talent Council Michigan Works! or an immediate family member, either directly or through corporations, trusts, or similar arrangements in which they hold a controlling interest.

[2 CFR Part 200.436 and .465(c)(3)]

- Family members include one party with any of the following relationships to another party: [2 CFR Part 200.436 and .465(c)(4)]
 - Spouse, and parents thereof;
 - Children, and spouses thereof;
 - Parents, and spouses thereof;
 - Siblings, and spouses thereof;
 - Grandparents and grandchildren, and spouses thereof;
 - Domestic partner and parents thereof; and
 - Any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship.

3. Capital Leases

Rental costs for leases that are required to be treated as capital leases under Generally Accepted Accounting Principles (GAAP) are allowable only up to the amount that would have been allowed had the property be purchased on the date the lease agreement was executed. This amount would include expenses such as depreciation, maintenance, taxes, and insurance. The provisions of GAAP must be used to determine whether a lease is a capital lease. Interest costs related to capital leases are allowable to the extent they meet the criteria in 2 CFR Part 200.449. Unallowable costs include amounts paid for profit, management fees, and taxes that would not have been incurred had the non-Federal entity purchased the property. [2 CFR Part 200.436, .449, and .465(c)(5)]

With limited exceptions, capital leases for land, buildings, and other real property are prohibited under federal programs administered by TIA. If permitted under the federal program, prior TIA approval is required.

XII. Contract Administration

Advance payments may be allowable for participant services contracts if approved by the UPWARD Talent Council Michigan Works' CEO/COO.

Payments to contractors for services will only be made according to the terms of the contract. This procedure is also outlined in a separate policy directive. Documents with original signature must be on file before checks in payment will be released. Standard payment date is three weeks from receipt of the cash request.

Requests for modifications by the Subcontractor must be in writing to the Chief Executive Officer/Chief Operating Officer. Upon approval of the modification by the CEO/COO, responsible staff will issue a modification to the contractor for signature.

This will include signature sheets and replacement pages for those pages of the contract affected by the modification. The CEO (or COO in his/her absence) will sign the modification as the representative of UPWARD Talent Council Michigan Works.

A contractor must include in their proposal any intent to subcontract any of the services proposed. Approval from UPWARD Talent Council Michigan Works! is required for all subcontracts. These procurement policies must be followed in any and all procurement of contractors. Failure to request approval of subcontracts is grounds for termination.

XIII. Contractor and Agency Disputes

All agency/contractor disputes arising from the terms of the contract must be addressed in writing to the Chief Executive Officer/Chief Operating Officer of UPWARD Talent Council Michigan Works. Correspondence must include the contract clause in dispute, the nature of the dispute, and any potential solution. Disputes will be processed in accordance with State and local policy.

XIV. Contract File

The following information will be on file and maintained by the UPWARD Talent Council Michigan Works:

- Executed copy of contract
- Pre-award survey or review information
- Copies of insurance policies
- Expenditure reports and cash requests
- Documentation relating to termination actions
- Closeout documents and records
- Any other documentation related to contract

XV. Inventory/Record Keeping and Reporting Procedures

A. Definitions

Acquisition Cost – The net invoice unit price, including the cost of modifications, attachments, accessories or auxiliary apparatus necessary to make it usable for the intended purpose. Other charges, such as, the cost of installation, transportation, taxes, duty or protective in-transit insurance, shall be included or excluded from the unit acquisition cost in accordance with UPWARD Talent Council Michigan Works' regular accounting practices.

Equipment – Tangible, nonexpendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

Intangible Personal Property – Property, other than real property, with no intrinsic value; its value lies in the rights conveyed. Examples include copyrights, intellectual rights, other rights, and patents.

Nonexpendable - Items that retain their original identity and characteristics during their useful life.

Property – Anything that is owned.

Real Property – Land, land improvements, buildings, structures, and attached items; excluding movable machinery and equipment.

Supplies – All tangible personal property other than “equipment” as defined in this part.

Tangible Personal Property – Property, other than real property, that can be seen, weighed, measured, felt, touched, or otherwise perceived by the senses.

B. Equipment, Supplies, and Intangible Property Use

Equipment, supplies, and intangible property acquired will be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by federal funds. When no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a federal agency.

The equipment, supplies, and intangible property will be made available for use on other projects or programs currently or previously supported by the federal government, providing such use will not interfere with the work on the projects or programs for which it was originally acquired. First preference for other use shall be given to other programs or projects supported by the awarding agency. User fees will be considered, if appropriate.

Equipment, supplies, and intangible property acquired with grant funds will not be used to provide services for a fee to compete unfairly with private companies that provide equivalent services, unless permitted by federal statute.

C. Equipment, Supplies, and Intangible Property Disposition

Disposition occurs when property acquired under a grant or subgrant is no longer useful or needed for the original project or program, or for other activities currently or previously supported by TIA or the federal awarding agency.

In determining the current fair market value for property to be disposed, equipment and intangible property is calculated on each unit of property (i.e., by individual item). Unused inventory of supplies is calculated in the aggregate (i.e., the combined total value of all unused supplies).

Disposition will be made as follows:

1. If the current fair market value is less than \$5,000, it may be retained, sold, or otherwise disposed of with no further obligation to TIA or the federal awarding agency.
2. If the current fair market value is \$5,000 or more, it may be retained or sold with the proportionate value or proceeds being treated as program income to the funding sources that participated in the original acquisition cost. The amount of program income is calculated by multiplying the current market value, or proceeds from sale, by the funding sources' shares of the original acquisition cost.

D. Real Property Use

Unless otherwise provided by federal statute, the use of real property acquired under a grant or subgrant is limited to the original authorized purpose.

E. Real Property Disposition

When real property is no longer needed for the original authorized purpose, TIA will provide instructions for disposition. The subsequent disposition instructions will provide for one of the following:

1. UPWARD Talent Council Michigan Works! will be allowed to retain the property. The funding sources that participated in the original acquisition cost will be compensated by multiplying the current market value by the funding sources' shares of the original cost.
2. UPWARD Talent Council Michigan Works! will be required to sell the property. The funding sources that participated in the original acquisition cost will be compensated by multiplying the proceeds from the sale by the funding sources' shares of the original cost.
3. UPWARD Talent Council Michigan Works! will be required to transfer the title of the property to TIA, the federal awarding agency, or a designated third-party. UPWARD Talent Council Michigan Works! will be compensated for its proportionate share of the current fair market value for any non-TIA grant funds used to purchase the property.

Submit real property disposal requests to:

Talent Investment Agency
Victor Office Center, 5th Floor
201 N. Washington Square
Lansing, Michigan 48913

F. Property Title

Title to all property acquired under a grant or subgrant will vest upon acquisition. UPWARD Talent Council Michigan Works! shall not encumber their title or other interests.

The federal awarding agency has a royalty-free, non-exclusive, and irrevocable right to reproduce, publish, and otherwise use, and authorize others to use for federal government purposes:

1. The copyright in any work developed under a federal grant or subgrant, or contract under a grant or subgrant; and
2. Any rights of copyright to which UPWARD Talent Council Michigan Works! or a contractor purchases ownership with federal grant support.

G. Property Management

All property, whether acquired in whole or in part with grant funds, will be managed until disposition in the following manner:

1. A control system will be in effect to ensure adequate safeguards to prevent loss, damage, or theft. Any loss, damage, or theft will be investigated, documented, and reported as necessary to the proper law enforcement authorities. Destroyed, Missing, or Stolen Equipment will be documented to include date equipment was destroyed, description of equipment, the serial number and cause of loss. UPWARD Talent Council Michigan Works! will contact local law enforcement authorities and request a report to be completed on any missing or stolen equipment. A copy of the report shall be maintained by UPWARD Talent Council Michigan Works. For equipment whose original cost was \$5,000 or more, a copy of the police report will be

forwarded to TIA. UPWARD Talent Council Michigan Works! will adjust inventory records accordingly.

2. Adequate maintenance procedures will be in effect to keep all equipment in good condition. Where appropriate, this will involve the securing of pertinent warranties and/or maintenance agreements.
3. If authorized or required to sell property, sales procedures will be followed to provide for competition to the extent practicable and result in the highest possible return.

H. Property Records

UPWARD Talent Council Michigan Works! will maintain records sufficient to detail the status and significant history of all property obtained in whole or in part with grant funds. At a minimum, property records will include:

1. A description of the property.
2. A serial number or other identification number for equipment.
3. Funding source used to purchase the property.
4. The title holder.
5. The acquisition date.
6. The acquisition cost.
7. Information to calculate the percentage by funding source of federal and TIA participation in the cost.
8. Location, use (i.e., program utilizing the equipment), condition of equipment, and the date the information was reported.
9. Any ultimate disposition data including:
 - a. Method used to determine current fair market value.
 - b. Sale price.
 - c. Date of disposal.
 - d. Method used to calculate the amounts to be credited to

each federal and non-federal funding source.

e. Final amount credited to each federal and non-federal funding source.

An inventory list of all current equipment must be maintained and continuously updated. A physical inventory of equipment must be taken and the results reconciled with the property records at least once every two years. At a minimum, property records must be retained for three years after final disposition of the property. If any litigation, audit, or claim, is initiated during the three year retention period involving the property, that property's records must be retained until resolution of all issues and final action is taken or until the end of the three year retention period; whichever is later.

Attachments: I. Vendor Procurement File Checklist

A printed copy of this manual is to be used as a desktop reference by all staff. It is the responsibility of the staff to update their hard copy manuals, once they receive updates.

An electronic copy will be posted to the Google Drive.

Inquiries: Inquiries regarding this procedure should be directed to your supervisor.

ATTACHMENT I



VENDOR PROCUREMENT FILE CHECKLIST

- _____ Project Rationale
- _____ Independent Estimate
 - * Set baseline for reasonable cost
- _____ Lease Versus Purchase, If Applicable
- _____ Public Notice
 - * Newspaper clippings (note date published and source) & Webpage printout
- _____ Request For Bid/Quotation/Proposal
- _____ Bidders Listing
- _____ Bids/Quotations/Proposals Received - # Received: _____
- _____ CEO Approval For Sole Source, If Applicable
- _____ Ratings, If Applicable
 - * Rating sheets from all reviewers, Summary of Ratings
- _____ Cost/Price Analysis
- _____ Verify SAM Website for Employer Debarment
- _____ Justification For Selection
- _____ Award/Non-Award Notice Letters
- _____ Listed On Inventory, If Applicable
- _____ Copy Of Purchase Order
- _____ Other: _____

Note: Will Be Applied As Applicable For Small Purchases



Attachment 5

LOCAL POLICY:

Michigan Training Connect (MiTC)

Date:	October 25, 2018
To:	All Staff
From:	Director of Workforce Services
Subject:	Approval/Denial of Training Provider for Michigan Talent Connect
Programs Affected:	WIOA-All, Wagner-Peyser
References:	Michigan Training Connect Policy Manual WIOA Manual Issued January 29, 2018

BACKGROUND

The Michigan Talent Connect (MiTC) serves as an important tool for participants seeking training to identify appropriate providers and relevant information such as cost and program outcomes. Using the MiTC, Workforce Services Specialists can assist participants in identifying training providers offering programs in high-demand industries that result in positive outcomes and recognized credentials.

The UPWARD Talent Council Michigan Works! approves or denies approval for training providers according to a standardized and objective process for training providers to be deemed an Eligible Training Provider (ETP), resulting in the training program posted publicly on the MiTC. Only training providers deemed eligible may receive WIOA training funds to assist participants.

POLICY

Initial and Continued Eligibility Approval Criteria

UPWARD Talent Council elects to follow the state minimum guidelines for criteria for initial and continued eligibility for the MiTC.

In addition to the required information, UPWARD Talent Council may, at its discretion, request additional information for initial and continuing eligibility criteria to verify or clarify performance levels or other standard criteria required to be reported by the training provider. Supplemental information may also be requested to pursue an exception that may avert a denial of eligibility or to verify the quality of the training provider.

As appropriate, UPWARD Talent Council may also consider the following characteristics of the training provider throughout the approval process:

- The ability of a training provider to partner with employers and to provide job placement services;
- Drop-out rate/completion rate of the training provider/program
- Training provider's compliance, or lack thereof, with federal disability and accessibility laws
- Quality of the credential offered
- Level of demand for related occupations within the region
- Other applicable characteristics.

UPWARD Talent Council may consider local economic conditions and the economic and demographic characteristics of students served by a training provider when reviewing and approving applications for continued eligibility. Training providers seeking continued eligibility approval under these circumstances must provide initial justification for each training program affected and describe the economic conditions impacting performance.

Deeming Providers Ineligible

Before deeming a provider ineligible for a justifiable reason as outlined in the MiTC Policy Manual, UPWARD Talent Council will engage in an objective investigation of the circumstances surrounding the possible removal. The investigation will be documented and presented to the Director of Workforce Services to make a final decision. If deemed grounds for removal, then the Director of Workforce Services will follow the procedure of:

- Request approval of removal from the TIA by submitting the results of the investigation to the TIA via email at MiTC@michigan.gov;
- Non-concurrence from TIA will be documented in the file
- With concurrence, UPWARD will notify the training provider in writing. The notification will include the rationale and the right of the training provider to appeal the decision by following the UPWARD Talent Council's Grievance and Complaint Procedure Policy.

UPWARD Talent Council reserves the right to make exceptions the Minimum Performance Standards requirement if a training program fails to meet or lacks documentation for at least

one of the minimum performance standards. In such a circumstance, the UPWARD Talent Council may take additional aspects of the training program into consideration, including but not limited to, the number of students who participated in the training program, local economic conditions, or other circumstances presented by the training provider.

Should the UPWARD Talent Council grant approval to a training provider failing to meet minimum performance standards, the UPWARD Talent Council will notify the TIA at MiTC@michigan.gov and supply the rationale for such an approval.

Approval Documentation

UPWARD Talent Council will maintain electronic documentation of training providers applications and supporting documentation that reflect the approval process.

Equal Opportunity and Nondiscrimination Requirements

All ETPs are subject to the equal opportunity and nondiscrimination requirements contained in Section 188 of the WIOA.

INQUIRIES

Inquiries regarding this policy are to be directed to your supervisor.



Attachment 6

Local Policy:

PRIORITY OF SERVICE

Policy Effective Date:	May 04, 2018
From:	Director of Policy and Compliance
To:	All Staff
Subject:	Priority of Service
Programs Affected:	All
Rescissions:	None
References:	Workforce Innovation and Opportunity Act (WIOA) Manual Issued January 29, 2018 Employment Services Manual Issued March 06, 2018 Trade Adjustment Assistance (TAA) Issued December 29, 2016 UPWARD Talent Council's WIOA Income Eligibility for Adults UPWARD Talent Council's Low Income Determination Policy Jobs for Veterans Act of 2002

BACKGROUND

UPWARD Talent Council is implementing a policy prioritizing career and training services to individuals served. Veterans and eligible spouses who meet the eligibility criteria for the program continue to receive first consideration. After veterans and eligible spouses, priority for individualized career and training services must be given to recipients of public assistance, other low-income individuals, and/or individuals who are basic skills deficient.

To determine priority of service, UPWARD Talent Council defines the following terms:

Priority of Service- individuals who meet the priority criteria at the time of program enrollment are given first consideration over a person who does not meet the priority criteria for receipt of employment, training and placement services. If the services or resources are limited, then the person meeting the priority criteria receives access to the service instead of a person who does not meet the criteria.

Veteran- an individual who has served at least one day in the active military, naval, or air service, and who was discharged or released from service under any condition other than a condition classified as dishonorable. This definition includes Reserve units and National Guard

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units activated for Federal Service. For further clarification refer to WIOA Section 3(63)(A) and 38 U.S. Code 101.

Spouse of Veteran- a spouse of a veteran: who died of a service connected disability; who has a total disability resulting from a service connected disability; who died while a disability so evaluated was in existence; or, any member of the armed forces serving on active duty who, at the time of application for assistance, has been listed for a total of ninety (90) or more days as either missing in action, captured in the line of duty by a hostile force or forcibly detained or interned in the line of duty by a foreign government or power.

Basic Skills Deficient- an individual who is unable to compute or solve problems, or read, write or speak English, at a level necessary to function on the job, in the individual's family, or in society, as stipulated under Section 3(5)(B) of WIOA.

Public Assistance- Federal, State, or local government cash payments for which eligibility is determined by a needs or income test.

Low Income- an individual who received income for a six-month period that does not exceed the higher level of the poverty line or 70% of the Lower Living Standard Income Level Guidelines.

PROCESS

Michigan Works! staff working with program eligible individuals must give priority for receipt of career and training services to participants in the following order:

- First, to veterans and eligible spouses who are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient.
- Second, to non-veteran eligible adults who are recipients of public assistance, other low-income individuals or individuals who are basic skills deficient.
- Third, to eligible veterans or eligible spouses who are not low income, not public assistance recipients or who are not basic skills deficient and meet the Housing and Urban Development Self-Sufficiency Guidelines adopted by the UPWARD Talent Council.
- Fourth, to non-veterans who are not low income, not public assistance recipients or who are not basic skills deficient and meet the Housing and Urban Development Self-Sufficiency Guidelines adopted by the UPWARD Talent Council.

Note: Veterans or spouses of certain veterans who meet the Dislocated Worker program eligibility criteria must be given priority over dislocated workers who are non-veterans.

INQUIRIES

Inquiries regarding this policy are to be directed to your supervisor.



Attachment 7

LOCAL POLICY:

RAPID RESPONSE AND LAYOFF AVERSION

Date:	June 18, 2018
To:	All Staff
From:	Director of Policy and Compliance
Subject:	Rapid Response and Layoff Aversion Policy for Responding Notifications or Potential Notifications of Plant Closings, Mass Layoffs
Programs Affected:	WIOA-DW, TAA
References:	WIOA Manual Issued January 29, 2018 TAA Manual Issued December 29, 2018

BACKGROUND

UPWARD Talent Council Michigan Works! implements statewide Rapid Response activities, in coordination with the state, to assist employers and impacted workers as quickly as possible following the announcement of a permanent closure, mass layoff, or natural or other disaster resulting in a mass job dislocation. Rapid Response activities are generally triggered by the filing of a Worker Adjustment and Retraining Notification Act (WARN) notice or Trade Adjustment Assistance (TAA) petition with the state.

This policy clarifies how UPWARD Talent Council Michigan Works! will conduct the required Rapid Response activities and Layoff Aversion Strategies under the Workforce Innovation and Opportunity Act (WIOA) and related federal regulations.

DEFINITIONS

General Announcement of a Plant Closing – An announcement or communication by an employer stating intent to close a business, regardless of the number of workers affected.

- A. Has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure, or any substantial layoff at, a plant, facility, or enterprise;
- B. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days.

Unlikely to Return to a Previous Industry or Occupation – An individual who is laid off without a recall date (or the recall date has passed) and is unlikely to return to an occupation based on one of the categories below.

- A. The number of jobs in the applicant's previous industry/occupation is declining based on Labor Market Information (LMI) data;
- B. A self-attestation document displaying distinctive characteristics that make them "unlikely to return" e.g. limited openings, outdated skills, physical limitations, lack of proper credentials, etc.

Unemployed as a result of general economic conditions in the community in which the individual resides – Business lost due to one of the following reasons:

- A. The closure of substantial lay-off of a primary supplier or customer affecting the self-employed applicant's products or services;
- B. Less demand for the occupation or product within the community;
- C. A decline in profits significant enough to lead to closure, documented by most recent tax return or other company documents showing negative gains/losses statement;
- D. Natural disaster, as defined by State or Federal declaration. Events that destroys the ability for a business to continue to operate.

Eligibility for self-employed individuals, including family members and farm workers or ranch hands – Self-employed individuals who work for profit or fees in their own business, profession, trade or farm.

- A. An individual who was self-employed but is unemployed, as a result of general economic conditions in the community in which the individual resides.
- B. This includes an individual who is self-employed or employed by another, or a family member from a farm, ranch, or fishing operation, which produces agricultural products and receives at least 50 percent of their family or individual income.

POLICY

UPWARD Talent Council, along with other key partners, will coordinate Rapid Response services to workers and employers in a timely fashion that is tailored to the unique circumstances of each dislocation event. UPWARD Talent Council will ensure that required information is provided to dislocated workers during Rapid Response layoff orientations.

Rapid Response services will be provided to workers and employers prior to dislocation events, if possible, or immediately following notification of the dislocation event, provided that such actions would not adversely impact any ongoing collective bargaining negotiations related to the dislocation event. UPWARD Talent Council will assure that the following Rapid Response Activities are implemented:

- Establishing and maintaining a local Rapid Response team. Members of the team may include representatives from UPWARD Talent Council, Unemployment Insurance Agency (UIA), Veteran Representatives, Michigan Rehabilitation Services (MRS), educational partners.
- Identifying a Rapid Response contact to coordinate with the Talent Investment Agency (TIA) Workforce Transition Unit.
- Planning assistance for dislocation events. Where feasible, Rapid Response assistance should be conducted on-site. Rapid Response assistance generally includes the following activities:
 - Consulting with the TIA Workforce Transition Unit, state and local economic development organizations, and other entities to avert potential layoffs.
 - Ascertaining and providing information related to severance, separation pay, retirement incentives and voluntary layoffs to establish financial support mechanisms with UIA and other partners while laid off workers transition to new careers.
 - Determining the proposed layoff schedule and what the employer(s) plans are to assist the dislocated workers, including the status of any collective bargaining negotiations affecting layoff benefits.
 - Coordinating the delivery of Rapid Response layoff orientations for affected workers.

- Assessing the needs of the impacted workers as quickly as possible through the use of surveys that determine affected workers' skills, education and potential assistance needs.
- Maintaining an inventory of available workforce resources for on-site meetings to address the short and long-term assistance needs of the impacted workers.
- Consulting and coordinating with appropriate labor representatives when planning Rapid Response activities for those impacted workers covered by a collective bargaining agreement.
- Ensuring timely access and referral to Michigan Works! Programs, services and information offered by WIOA, TAA, Wagner-Peyser and other programs.

When Rapid Response activities are near completion, the UPWARD Talent Council Rapid Response contact will coordinate with Workforce Services Specialists to transfer the responsibility for service delivery to those dislocated by layoffs or closures who are interested in accessing career services, training services, supportive services and other relevant services.

UPWARD Talent Council staff or partners who become aware of a WARN-level layoff or closure event, must notify UPWARD Talent Council leadership immediately. Leadership will notify the TIA Workforce Transition Unit to discuss the event and begin formulating strategies for carrying out Rapid Response activities.

If a layoff or closure event does not meet the WARN threshold or is not TAA related, UPWARD Talent Council will initiate a local Rapid Response and inform the TIA Workforce Transition Unit of the Rapid Response event and number of attendees.

Layoff Aversion

A layoff aversion strategy helps employers retain a skilled workforce and/or provides workers rapid transition to new employment, minimizing periods of unemployment. If there is an indication that the business closing or mass layoff might be averted, then the UPWARD Talent Council and the TIA Workforce Transition Unit can provide technical assistance to interested parties to investigate possible layoff aversion strategies.

Early warning systems are necessary to ensure a timely response to worker dislocations. Layoffs can be identified in a variety of ways, including but not limited to; discussions with employer representatives or employees, meetings with organized labor, increased Unemployment Insurance claims, press attention, a WARN Act notice or Trade Act Petition. Systems should be in place to regularly and proactively monitor all these notification channels.

A critical aspect of our outreach to the employer and business community is assessing the health of a company with respect to employment issues. A majority of UPWARD Talent Council's Workforce Services Specialists – Employer focused staff are certified Business Solutions Professionals and can proactively assist employers to assess issues that are of concern to them. If employee layoff appears to be eminent, necessary community partners, including economic development agencies and education will be brought together to determine if a plan can be developed to assist the company in averting any layoffs.

Layoff Aversion services will be provided to all identified business and industry through referrals generated by UPWARD Talent Council's early intervention/layoff aversion network.

The activities that are included as part of a layoff aversion include but are not limited to:

- **Prefeasibility studies** – provide objective evidence as to the likelihood of an employer remaining operational or having workers explore the purchase of the company and continue its operation. The studies assess the employer's business operations in the following areas: organizational structure, market, operations/manufacturing, financial, legal and conclusions.
- **Deteriorating business prospects/financial condition** – recognize financial indicators leading to potential layoffs, such as, bankruptcy, rate and pattern of decline, industry uncertainty, etc.
- **Data collection** – gather published and unpublished information about area businesses. Published information on companies can be found in annual reports, data-bases, trade journals, the business press, and public records. Unpublished information derives from people with firsthand knowledge of the company, including employees, customers, residents, service providers, local development officials and local government.
- **Employee training (OJT)** – train and develop the local workforce.
- **Technical assistance** – investigate opportunities to save jobs and avoid resulting hardships imposed on individuals and communities when a plant or business closes.

State Adjustment Grants (SAGs)

State Adjustment Grants are additional funding allocations to meet documented funding deficits. SAGs may be requested if circumstances in our region warrant. UPWARD Talent Council Michigan Works! will continuously monitor expenditures and obligations of WIOA Dislocated Worker funds

and seek out additional funds as necessary following TIA Policy Issuance 18-15 WIOA Dislocated Worker (DW) State Adjustment Grants (SAGs).

Rapid Response Contact

UPWARD Talent Council Michigan Works!
Director of Workforce Services
2950 College Avenue
Escanaba, MI 49829
mwjob@isupward.org
(906) 789-9732

INQUIRIES

Inquiries regarding this policy are to be directed to your supervisor.