

Section V: Operations and Compliance

- 1. Copies of executed cooperative agreements which define how all local service providers, including additional providers, will carry out the requirements for integration of and access to the entire set of services available in the local SC Work system. This includes agreements between the local board or other entities with respect efforts that will enhance the provision of services to individuals with disabilities, such as the cross training of staff, technical assistance, the use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination:***

The SC Works Business Plan is attached to this section (Attachment V-A).

Attachment V-B contains Memorandum of Agreements between the Greenville Workforce Development Board and the Upstate Workforce Board.

Attachment V-C contains the SC Works System Memorandum of Understanding and Infrastructure Sharing Agreements.

The Upstate Workforce Board issues instruction letters on its website. There is an instruction letter that allows for technical assistance requests. In addition to this, we ask grantees if they need any training or assistance during our monthly grantee meetings and during monitoring.

Earlier in this plan, we described how staff/partners are cross trained on ADA assistive equipment so they may serve all customers with disabilities.

Businesses must sign Incumbent Worker Training and On-the-Job Training agreements. Those templates are issued by SCDEW to the local boards.

Sharing of information is primarily done through social media, through our monthly dashboards, grantee meetings, partnership meetings and job fair notices.

- 2. A description of the entity responsible for the disbursement of grant funds as determined by the chief elected official(s):***

The Upstate Workforce Board chose Spartanburg County as the fiscal and administrative agency for the WIOA federal funds many years ago. This was also approved by the local elected officials in Cherokee and Union counties. Spartanburg County has the lowest indirect cost rate of all workforce board administrative entities in the state of South Carolina. The Upstate Workforce Board Executive Director reports to the Board of Directors and is considered a Department Head under Spartanburg County. All Upstate

Workforce Board staff are on the payroll of Spartanburg County except one staff person doing business surveys and she is on a temporary payroll.

3. A description of the competitive process that will be used to award the sub grants and contracts for WIOA Title I activities:

The Upstate Workforce Board follows the procurement process policy of Spartanburg County. Our next request for a Youth Training Provider will be issued in 2024. The next request for a SC Works Operator will occur in 2025. The SC Works Operator procurement is done jointly for both Greenville and the Upstate by Spartanburg County.

Policy:

- \$50,000 and above: Must receive the approval from Spartanburg County and the Upstate Workforce Board Executive Director. Our two program grantees fall under this procurement. A non-mandatory, pre-bid conference is scheduled prior to the due date for the proposals. This procurement is done by sealed bid, but the lowest bid does not necessarily have to be awarded. When procuring for a grantee to run our SC Works One Stop, the One Stop Committees of the Greenville and Upstate Workforce Boards share ~~has the~~ responsibility for reviewing proposals and making a recommendation to the full Greenville and Upstate Workforce Boards for approval. The Youth Committee of the Upstate Workforce Board is responsible for reviewing proposals for youth program funding and making a recommendation to the full Upstate Workforce Board. There is an appeal procedure.
- \$10,000 and above: Must receive sealed bids in response to a written request, awarded to lowest bidder. Must also have approval of the Upstate Workforce Board Executive Director.
- \$5,000 and above: Must receive SCDEW approval for equipment. Must also have approval of the Upstate Workforce Board Executive Director.
- \$2,500 to \$9,999: Must receive 3 quotes, awarded to the lowest bidder. Must also have approval of the Upstate Workforce Board Executive Director.
- \$1,000 to \$2,499: Must receive 2 quotes.
- \$250 - \$999: Requires written approval in advance (email permitted) by the Associate Director.
- Under \$250: Processed by the Upstate Workforce Board Finance Manager.

4. Agree Upon local performance goals after negotiations are finalized:

Program Year 2022 and 2023 goals are below -

WIOA Title I – Adult	Program Year 2022 & 2023 Goals
Employment Rate 2 nd Quarter after Exit	78.7%
Employment Rate 4 th Quarter after Exit	76.5%
Median Earnings in the 2 nd Quarter after Exit	\$6,429
Credential Attainment Rate	66%
Measurable Skills Gains	55.2%

WIOA Title I – Dislocated Worker	Program Year 2022 & 2023 Goals
Employment Rate 2 nd Quarter after Exit	81.6%
Employment Rate 4 th Quarter after Exit	80%
Median Earnings in the 2 nd Quarter after Exit	\$7,935
Credential Attainment Rate	60.5%
Measurable Skills Gains	57.1%

WIOA Title I – Youth	Program Year 2022 & 2023 Goals
Education or Training Activities or Employment Rate 2 nd Quarter after Exit	79%
Education or Training Activity or Employment Rate 4 th Quarter after Exit	73%
Median Earnings in the 2 nd Quarter after Exit	\$2,500
Credential Attainment Rate	72.2%
Measurable Skills Gains	40.5%

5. ***A description of actions the local board will take toward becoming or remaining a high-performing workforce area, including:***

- ***The effectiveness and continuous improvement criteria the local board will implement to assess their one-stop centers*** - The Upstate Workforce Board has its Chief Operating Officer (COO)/Associate Director in direction over the WIOA service providers/grantees. The providers consistently meet with the COO to ensure WIOA compliance at the federal, state and local levels. SC Works receives survey results monthly from job seekers and WIOA customers. ~~Beginning in program year 2020, the business surveys are conducted and received by the Upstate Workforce Board staff. This was necessary as no employer surveys were coming in for job postings and screenings except when specific recruiting events occurred.~~ The Upstate and Greenville Workforce Boards now contract with an individual to conduct the business surveys. The survey results are sent to the Upstate Workforce Board staff. At the recruiting events, the Regional Director of Business Solutions would ensures that surveys were are completed. The results of surveys are reviewed, and changes are made to the system processes as needed. Secret shoppers are used periodically to 'shop' the services of the programs. This has proven to be the best method of monitoring customer service, processes and outcomes of the customers. This program year, the State Workforce Development Board implemented secret shopping of the 12 workforce areas.

Each WIOA grantee submits monthly dashboards that reflect relevant program information. See Attachment V-D for a copy of the October 2022 Dashboards. The dashboards give the Upstate Workforce Board the ability to observe trends and see a monthly snapshot of the services provided. Any areas of concern are immediately addressed. The dashboards provide performance information above the WIOA required performance measures.

Grantee meetings are held to have discussion on program services and customers. These meetings are held monthly offsite at a coffee shop or restaurant to deter distractions. During this time, technical assistance may be requested. At times, the Upstate Workforce Board staff may detect a training need based on dialogue with program staff.

The youth program grantee conducts customer surveys sporadically with their customers. Upon exit of the program, students give feedback for improvement or make suggestions.

The Upstate Workforce Board's Executive Director issues numbered instruction letters to the two programs as needed to communicate changes and updates. The link to those letters is below.

<https://www.upstateworkforceboard.org/local-instruction-letters>

- ***A description of fiscal and program performance goals beyond the federal measures and how progress will be tracked and made publicly available*** – See the above answer to previous question. Dashboards are posted on the Upstate Workforce Board website. They are also reviewed in the One Stop Committee, Youth Committee and Upstate Workforce Board meetings and these meetings are also open to the public. The Upstate Workforce Board staff also require that success stories be published. <https://www.upstateworkforceboard.org/news> .

In addition to the above, the local area tracks the following measures monthly to ensure the requirement is met annually.

- ◆ Participant Cost Rate Policy (expected to meet a minimum of 30%)
 - ◆ Obligation Rate Policy (must obligate 80% of the program portion of current allocations)
 - ◆ Fund Utilization Policy (must have a minimum of 70% of funds expended by end of program year)
 - ◆ Priority of Service (must serve 70% low income and/or basic skills deficient). This requirement is higher than the federal law requires and impacts us to be able to serve individuals already working that are interested in promotions or skill upgrades. If this were 51%, we could better serve our employer customers in dire need of employees.
- ***A description of the methodology used by the local board to allocate SC Works center infrastructure funds*** – The Upstate Workforce Board utilizes the square footage methodology for allocating infrastructure costs of the SC Works center. The Infrastructure Funding Agreement is a plan to fund the costs of the operations of the One Stop System. Partners enter into an agreement to support the cost of shared services and jointly occupied facilities. The square footage methodology classifies space based on its purpose and reasonable methods of determining each partner’s proportionate share. The three types of space are sole, public assess resource room and common space. (see Attachment V-C)

Cost allocation among partners shall meet the WIOA regulations, Federal Uniform Guidelines, state rules and policies. This agreement is modified annually. Some shared costs may include:

- ✓ Rental space
- ✓ Copier costs
- ✓ Phone and internet services
- ✓ Information and technology maintenance

✓ Office supplies

- ***A description of the roles and contributions of SC Works partners, including cost allocation*** – this description is detailed in the Memorandum of Understanding and Infrastructure Funding Agreement plan which has been included as an attachment. Infrastructure costs related to the operation of the SC Works Upstate Center are currently allocated among partners who either occupy the facilities or make use of the facilities. The cost of rent, phones, etc. is divided based on the square footage method by which each partner is apportioned their part of the costs. This is based on the blend of the amount of space they actually occupy within each center and the number and variety of customers served or usage time for the facilities.

See page 62 which begins the listing of the partners and their roles. Financial contribution is listed in Attachment V-C.

6. ***A description of how adult and dislocated worker training services will be provided through the use of individual training accounts (ITAs), including:***

- ***If contracts for training services will be used*** – The Upstate Workforce Board’s SC Works WIOA program primarily utilizes the training services from the eligible training provider list and issues individual training accounts, not contracts. The exceptions are on-the-job training contracts, incumbent worker training contracts, work experience agreements and transitional job agreements. **These are written with the employer.** The maximum expenditure amount for any combination of training that SC Works staff may approve is \$12,000, excluding supportive services. Requests for exceptions to these requirements or limits require a completed waiver request form, to be signed and approved by the Upstate Workforce Board Executive Director, but cannot exceed \$14,000. It is very rare to have a cost exceeding the \$12,000 limit.

The ACHIEVE youth program may have signed agreements with training providers based on the student’s interest such as forklift certification/training, CellBotics training, certified nursing assistant, MSSC, etc.

- ***How the use of training service contracts will be coordinated with the use of ITAs*** – we do not use training service contracts other than those listed above. Should an individual complete training through the use of the individual training account (ITA) and then be placed in on-the-job training, the Project Accountant will ensure that the customer’s training costs do not exceed the ITA limit. Equus Workforce Solutions staff utilize a financial reporting system that tracks all costs associated with the participant. Training providers must upload their trainings on the eligible training provider list and sign a memorandum of agreement with SCDEW in which the providers agree to supply data about themselves and their programs. Once the customer selects the training desired

from the eligible training provider list, their assigned Talent Development Specialist creates their ITA under the established guidelines.

- ***How the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided*** – The One Stop Operator’s Talent Development Specialists will review training options with customers. Customers may make an informed selection of their training program through the www.scpaath.org site. The assigned Talent Development Specialist must feel confident that the individual has the basic skills and ability to complete the training program.

The Upstate Workforce Board and SC Works staff engage with as many training providers as possible directly. This ensures that information pamphlets, social media links, points of contact, presentations and other information shared by the Talent Development Specialists are up to date. The SC Works staff make valuable use of tools such as the O*Net and Career Interest profiles which help customers make decisions on training options. Other factors considered when these decisions are being made are transportation methods to and from training, childcare availability during the times of training, household budgeting, etc. These same factors are also reviewed for on-the-job training, work experience and transitional job customers. We currently do not have many options for customers on the eligible training provider list as most providers find the reporting too cumbersome and choose not to participate.

7. ***A description of the process used by the local board to provide a 10-day public comment period prior to submission of the plan, including an opportunity to have input into development of the local plan, particularly for representatives of the business, labor organizations, and education.***

In Section III, we list the individuals invited to review the plan along with those attending the Zoom meetings for plan review. In addition to this, the plan is posted on the Upstate Workforce Board website along with the regional plan and on the SC Works website for public comment. We also have the link sent to the 13 public libraries, the 4 chambers of commerce and all 9 school superintendents. We also have a representative from labor on the Upstate Workforce Board. We ensured that small, medium and large businesses were included in the review invitation. All three counties had individuals invited to participate in the review process.

8. ***A description of how the local area SC Works centers are implementing and transitioning to an integrated, technology-enabled intake and case management information system for programs carried out under WIOA and by SC Works partners.***

A virtual job fair platform was purchased by the Upstate Workforce Futures Corporation. This has allowed us to hold several virtual job fairs. This purchase was made due to the

COVID-19 pandemic in an effort to serve businesses and provide conference opportunities to organizations. All fairs and conferences will be offered for a fee. That fee is based on size and staff time required. This virtual platform has been so successful that it will likely become the primary means for conducting recruiting events in the future. We will also conduct a Career Awareness Showcase for high school students utilizing this platform in partnership with the Regional Center Director from the SC Department of Commerce. We will be able to host virtual career and college fairs in the schools using this platform. This will help link companies with students more directly to spark interest in careers in the Upstate area.

Update: The State Workforce Development Board purchased a virtual job fair platform, and the 12 local boards may use this platform. Equus purchased the same platform that we purchased during COVID-19 as our license expired. That platform has been preferred because our business customers have built profiles in that system and had experience in its use. We are mostly conducting in-person job fairs currently.

As has been written in other sections, the staff in both WIOA funded programs have been using Webex and Zoom for meetings with customers to conduct workshops and for case management. WIOA orientations have also occurred virtually. Emails and texts are also used. We look forward to other technologies that will surface due to our need for distancing.

Update: Staff still use virtual methods to communicate; however, they are not as prevalent as they were during the pandemic.

Job seekers already had the SCWOS system available to them virtually. We are seeing more online training options coming available, so individuals do not have to go to a classroom. These online trainings will be properly vetted for quality.

Update: Online training works well for some curriculums, but for others it is not appropriate. We are definitely more open to online training options post pandemic than we were prior to the pandemic.

O*Net has a plethora of careers that people can review that include videos.

Co-enrollment is occurring virtually, but it would be much more successful and seamless if all partners were under one data system.

9. ***A description of how the local board is serving priority populations, including those with barriers to employment, as required by WIOA – please see the following link. Also, the The Associate Director performs desktop monitoring quarterly to ensure that we are meeting this measure. This is also discussed during our monthly grantee meetings.***

The SC Works and Upstate Workforce Board staff have engaged in outreach to those in low-income areas. We also hold events (job fairs and workshops for example) in many of the low-income areas. This was placed on hold with the China virus outbreak. We plan to continue this

~~outreach in person once there is a cure. In the meantime, we will work to conduct outreach virtually, but it is tougher with the low-income population using this method.~~

10. ***A description of how the local board is serving priority populations, including those with barriers to employment, as required by WIOA*** – Also The Associate Director performs desktop monitoring quarterly to ensure that we are meeting this measure. This is also discussed at the grantee meetings monthly.

All program staff are aware of this metric. The Operations Manager and Project Accountant for SC Works monitor this metric periodically to ensure compliance.

Our local agreements with our grantees operators contain goals to ensure we are striving to serve all populations. Most recent goals are as follows:

- ~~○ 20 Veterans~~
- ~~○ 14 Individuals with Disabilities~~
- 20 Individuals with Criminal Backgrounds
- 155 new enrollments with 70% being low-income or basic skills deficient with a recommendation that we be at 75%
- 20 On-the-Job training contracts at a minimum
- Community outreach events in each county per month (4 in Cherokee, 4 in Union, 8 in Spartanburg)
- 4 recruitment events at SC Works monthly
- 1 regional job fair annually
- 1 social media post per workday
- 200 new Facebook followers during PY22 (baseline 5,627)

Different recruitment strategies are used to identify these individuals priority populations. Partner referrals tend to be the most effective. The Upstate Workforce Board staff review the demographics of those we serve quarterly. We do find that individuals do not want to disclose a disability which makes it difficult to truly know the number of individuals we are serving with a disability.

11. ***A description of the local area's fiscal and programmatic monitoring process.***

All Upstate Workforce Board grants will be monitored once during the grant period for programmatic compliance and once for financial compliance. Desktop monitoring, to include SCWOS data, will be ongoing throughout the year. Areas to be reviewed during on-site compliance monitoring visits include:

- Performance and Compliance
- Financial Procedures and Reporting
- Equal Opportunity
- Grievance Procedures
- Competency Attainment
- Workforce Innovation & Opportunity Act Eligibility Certification

- Inventory
- Case Management Processes/Tools
- Spreadsheet associated with Local Instruction Letter 13-20 (Tracking Training Related Employment)
- Compliance with all One Stop processes/standards
- Customer Interviews

Please see attachment V-C V-E for details on this process.

12. Copies of current local board policies and definitions, including:

- **Supportive Services Policy** – see attachment V-F for both programs
- **OJT reimbursement policy** – see attachment V-G (also more detail in Equus Work Statement)
- **IWT Policy, when using local funds** – see attachment V-H
- **Youth incentives policy** – see attachment V-I
- **Local training cap policy** – see attachment V-G
- **Youth BSD policy** – not applicable as we use TABE tests
- **Local definition for youth who “require additional assistance”** - see attachment V-J
- **Adult and Dislocated Worker self-sufficiency definition(s) for training** – The Adult self-sufficing policy is 200% of the Lower Living Standard Income Level (LLSIL). The Dislocated Worker self-sufficiency policy is employment attained at 85% of pre-layoff wages.

13. Copies of current local workforce area documents, including:

- **Memorandum(s) of Understanding, including signature sheets** – see attachment V-C
- **Resources Sharing Agreements, including signature sheets** – see attachment V-C
- **All service provider grants including statements of work and budgets** – see attachment V-K for Equus and V-L for ACHIEVE
- **Statements of work for in-house operational staff (where applicable)** - the Upstate Workforce Board outsources all programs
- **Current or most recent Grant Application Request(s) for Proposals** – Youth Program RFP is attachment V-M and One Stop Operator RFP is attachment V-N
- **LWDB By-Laws** – see attachment V-O
- **LWDB and Committee Schedules** – see attachment V-P
- **LWDB budgets** – attachment V-Q
- **Local monitoring schedules** – see below

<u>Site</u>	<u>Start Date</u>	<u>End Date</u>
USC Upstate ACHIEVE	10/21/2022	12/2/2022
SC Works Upstate (all locations)	01/27/2023	03/10/2023

Programmatic, EO review/inspection and financial monitoring will occur concurrently. Entrance and exit conferences will be scheduled as closely as possible to the end date listed above.