

Imperial County Workforce Development Board

Local Workforce Development Plan Program Years 2021–2024



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I. INTRODUCTION

In accordance with the requirements of the Workforce Innovation and Opportunity Act (WIOA) of 2014 and guidance published by California Workforce Development Board and Employment Development Department, the Imperial County Workforce Development Board (WDB) has developed a four-year Local Plan covering program years 2021-2024. Upon approval by state officials representing the Governor, the plan will be effective from July 1, 2021 through June 30, 2025. This plan replaces the WDB's PY 2017-2020 Local Plan and its 2019 modification. While this plan carries forward some of the strategies that have made local services effective and programs successful, it expresses the intention of the WDB to examine and embrace opportunities for improvement over the life of the plan.

For reference, it should be noted that the Imperial County WDB, the Imperial County Workforce and Economic Development Office (ICWEDO), and America's Job Center of California (AJCC) are used somewhat interchangeably throughout this Plan to describe the entity operating workforce development services under Title I of WIOA.

Vision for the PY 21-24 Local Plan

During the process of developing this Plan, members of the Workforce Development Board and system stakeholders participated in discussions regarding system priorities. As a result of these discussions, the WDB has identified the following broad themes around which they will mobilize efforts during the course of this four-year Plan.

Training for Emerging Industries: The workforce system partners, secondary and postsecondary education agencies, economic development and business services organizations, and community stakeholders should work together to identify needs, opportunities, and strategies around employment and training for industries that are either establishing a footprint or considering locating operations in Imperial County. These sectors may include manufacturing, information and communications technology, and logistics and transportation, which are likely to find the County's affordable land and the young and growing workforce desirable resources for business operations.

Strategies to Increase Digital Access and Equity: Individually, the workforce system partners will not be able to solve the substantial digital divide that exists in the County. However, working together, the stakeholders will be better equipped to develop recommendations for state, county and municipal leaders that include ways in which workforce and education partners could address the growing need for technology and digital skills training among Imperial County residents.

Consolidated Planning: Stakeholders report that there are dozens of distinct and varied public and private sector plans in Imperial County that concern economic development, business services, infrastructure, education, workforce development, and human services. The WDB, working with a wide range of partners, should support an effort to

examine the benefits of consolidating information from these plans into a unified strategy to support businesses and workers throughout the County.

Increased Resource Sharing among Partners: The workforce system partners have made great strides in recent years to more closely and effectively coordinate service delivery across multiple programs and funding streams. The partners should develop a plan to examine where sharing of resources and elimination of possible redundancies could further strengthen program alignment.

Section V of this plan summarizes these and other issues, strategies, approaches, and key considerations that the Imperial County WDB and the system partners will examine over the course of this plan.

Developing Imperial County WDB's PY 2021-24 Four-Year Plan

Imperial County WDB management held a series of discussions and community and stakeholders forums to secure input on key issues concerning the content and focus of the Local Plan. These sessions are described in Appendix 1 to this Plan. Plan development also entailed a review of partnerships, services, and systems, along with an assessment of where improvements can be made. Completing the plan took approximately three months, after which it was made available for public review and comment, prior to being forwarded to the California Workforce Development Board for review.

Impact of COVID-19 on the PY 2021-24 Local Plan

Imperial County has experienced greater COVID impacts per capita than any other county in California. Every aspect of developing the PY 2021-24 Local Plan was influenced by the onset on COVID-19, the ensuing public health crisis, and the myriad effects of the pandemic on businesses, schools, government operations, and the local workforce development delivery system. When the stakeholders met, discussions were held, priorities were identified, and a new four-year plan was developed. The influence of the pandemic on the planning process is undeniable, as it shaped stakeholders' views about the economy, the workforce, training and, virtually every aspect of the workforce system.

While the content of this plan frequently references the pandemic, most descriptions of activities and services are described in a "non-pandemic" context. Imperial County WDB leaders and system stakeholders recognize that the effects of COVID-19 will likely shape our work over the next several years, particularly during the first half of the period covered by this plan.

II. WIOA CORE AND REQUIRED PARTNER COORDINATION

The Workforce Innovation and Opportunity Act includes requirements for Local Boards to establish a framework for collaboration among state and local programs that are financially supported by nineteen distinct federal fund sources. Six of these programs constitute the four “core partners:” the WIOA Title I Adult, Dislocated Worker and Youth Programs; the WIOA Title II Adult Education and Family Literacy Act Program; the WIOA Title III Wagner-Peyser Act Program; and the WIOA Title IV State Vocational Rehabilitation Services Program. The core partners, together with thirteen other federally supported programs, make-up the WIOA-mandated one-stop partners. The Imperial County WDB has entered into a memorandum of understanding (MOU) with the organizations managing each federal program at the local level. The narrative that follows describes coordination with the WIOA core and other required program partners as prescribed by the Act.

Coordination with AJCC Partners and WIOA Memoranda of Understanding

Imperial County WDB has built strong and effective relationships with state and local agencies that represent the one-stop partner programs. Over the next four years, the WDB looks forward to further enhancing coordination with each of the workforce system partners.

Overview of Local One-Stop System Partners

Following is a summary of the local/regional organizations representing the federal one-stop partner programs, with which the Imperial County WDB has entered into an MOU.

Federal Partner Programs	MOU Partner
Title I Adult Title I Dislocated Worker Title I Youth	Imperial County Workforce Development Board
Title II Adult Education and Literacy	Central Union High School District
Title III Wagner-Peyser Unemployment Insurance (UI)	Employment Development Department (EDD)
Title IV Vocational Rehabilitation	California Department of Rehabilitation (DOR)
Carl Perkins Career Technical Education	Imperial Valley College
Title V Senior Community Service Employment Program (SCSEP)	Public Administrator’s Area Agency on Aging
Job Corps	San Diego Job Corps Center
Native American Programs	California Indian Manpower Consortium, Inc.

(WIOA Section 166)	
Migrant and Seasonal Farmworkers (WIOA Section 167)	Center for Employment Training
Jobs for Veterans State Grants	Employment Development Department (EDD)
Youth Build	Not applicable. There is no Youth Build program in Imperial County.
Trade Adjustment Assistance (TAA)	Employment Development Department (EDD)
Community Services Block Grant	Campesinos Unidos
Housing and Urban Development E&T	Imperial Valley Housing Authority
Unemployment Insurance (UI)	Employment Development Department (EDD)
Second Chance	Not applicable. There is Second Chance-funded program in Imperial County.
Temporary Assistance for Needy Families (TANF)/CalWORKs	Imperial County Department of Social Services

Memoranda of Understanding with System Partners

The Imperial County WDB has entered into an MOU with the AJCC partners outlining their joint planning and system coordination efforts, which include the following:

- Continuous relationship building among all partners
- Continuous planning in response to state and federal requirements
- Responsiveness to local and regional economic conditions, including employer needs
- Adherence to common data collection and reporting, needs, including modification and changes, as required
- Making the appropriate service(s), applicable partner program, available to customers through the one-stop delivery system
- Participating in the operation and development of the one-stop system, consistent with the terms of the MOU and requirement of authorized laws
- Principally, the workforce services of the AJCCs that the partners provide, either on-site or through electronic connections including those described in WIOA: basic career services; individualized career services; training services; follow-up services; employer/business services
- Participating in cross-training to ensure staff develops the knowledge, capacity and ability to advocate for their customers’ needs.

AJCC partners have agreed to share costs to operate with a comprehensive AJCC. Contributions are shared for both infrastructure costs and other costs, including WIOA career services. Infrastructure costs are proportionately shared by collocated partners

based on service benefit and FTE methodologies. Other costs, including agreed upon career services, will be shared by AJCC partners and based on factors, such as receipt of benefit and/or partner referral. Costs for the one-stop delivery system have been agreed upon through an Infrastructure Funding Agreement (IFA) and budget that identify partner payment methods as cash, non-cash (in-kind), and or third party contributions.

The roles of the partners are constantly evolving and, as continuous partnership building and collaboration occur, refinement of roles and responsibilities are likely. Expansion or changes in roles would be reflected in the future updates and amendments to the MOU.

Coordination with AJCC Partner Programs

The following information summarizes the ways in which the Imperial County WDB and the local workforce system collaborate with organizations managing the federally mandated one-stop partner programs.

WIOA Title I – Adult, Dislocated Worker and Youth Programs: The three formula-funded programs are administered by the Imperial County WDB. Services are delivered at three comprehensive and two satellite AJCCs.

WIOA Title II – Adult Education and Literacy: Central Union High School is the WIOA Title II adult education and literacy grant recipient partner. Referrals are regularly made between the Title I and Title II programs and many participants are co-enrolled. When the California Department of Education requests applications for Adult Education Title II Education and Literacy Activities, Imperial County WDB staff reviews applications to determine how they complement the Local Workforce Development Plan.

WIOA Title III – Wagner-Peyser: Wagner-Peyser staff is co-located in the AJCCs, where staff works with EDD to coordinate marketing and outreach to UI claimants, ensuring full access to all available WIOA services. EDD and AJCC staff also collaborate on Rapid Response orientations and services for laid off workers.

WIOA Title IV – Vocational Rehabilitation: DOR assists individuals with disabilities with employment and related services. DOR provides job readiness services, workshops, and vocational training, resulting in employment in an integrated work setting. Technology assistance is also provided as required to support participation in training and work.

Carl Perkins Career Technical Education: The Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV) is a principal source of federal funding to states and discretionary grantees for the improvement of secondary and postsecondary career and technical education programs across the nation. The purpose of the Act is to develop the academic, career, and technical skills of secondary and postsecondary students who elect to enroll in career and technical education programs. Imperial Valley College is the local recipient of Perkins funding.

Title V Older Americans Act: The Senior Community Services Employment Program (SCSEP) offers short-term pre-vocational services to eligible seniors who are 55+, low income, and have barriers to employment; and provides part-time, temporary on the job training through community service assignments at local nonprofits and government agencies.

Job Corps: San Diego Job Corps Center serves individuals ages 16-24. As part of this residential program, participants receive academic instruction, vocational training, and job readiness training. Job Corps also provides job placement assistance and follow-up services. Imperial County youth are referred to Job Corps by the AJCCs.

Native American Programs (WIOA Section 166): Imperial County WDB collaborates with California Indian Manpower Consortium (CIMC) to provide referrals and co-enrollment opportunities for Indian and Native American job seekers, along with access to all WIOA and partner services offered through the AJCC.

Migrant Seasonal Farmworker Program (WIOA Section 167): The Center for Employment Training (CET) is the migrant and seasonal farmworker program grantee for Imperial County. CET provides training for a variety of occupations at their El Centro campus. Following training, clients receive job placement assistance and follow-up services. CET also offers ESL training and assists clients in preparing for the GED exam.

Veterans: EDD administers this program and designated Disabled Veterans' Outreach Program (DVOP) and Local Veterans' Employment Representatives (LVER) Specialists are stationed at the comprehensive AJCC to assist veterans seeking employment.

Trade Adjustment Assistance Act: TAA is a federal program that provides aid to workers who lose their jobs or whose hours of work and wages are reduced because of increased imports. The TAA program offers a variety of benefits and reemployment services to help unemployed workers prepare for and obtain suitable employment. Workers may be eligible for training, job search and other reemployment services. Coordination with TAA generally includes co-enrollment into WIOA, which provides multiple benefits, including TAA funds being used to cover all training costs.

Community Services Block Grant: Campesinos Unidos Inc. offers a variety of community services programs. Information and services are communicated through the organization's website and by outreach advocates.

Housing and Urban Development Employment and Training Program: The Imperial Valley Housing Authority (IVHA) offers affordable housing through public units with rent based on income, section 8, non-elderly disabled section 8, senior/disabled housing, and housing for farmworkers. IVHA is committed to working with workforce system partners participating in the MOU.

Unemployment Compensation: The Unemployment Insurance program is generally represented at the AJCCs by EDD's Wagner-Peyser staff. AJCC staff works with EDD to

coordinate marketing and outreach to UI claimants, ensuring full access to all available WIOA services.

Temporary Assistance for Needy Families/CalWORKs: The Imperial County Department of Social Services (ICDSS) provides essential basic need assistance to individuals by connecting them to critical benefits including General Relief, referrals to Medi-Cal, CalFresh, CalWORKs, and other social service programs. WDB and DSS staff collaborate on various programs, initiatives, and cross-referrals. Co-enrollment between the agencies is common.

Partners' Efforts to Collaborate on Co-Enrollment and Case Management

The Imperial County workforce development system partners have collaborated on a number of strategies to strengthen program alignment, leverage resources, and coordinate service delivery for job seekers who are eligible across multiple programs and may benefit from services offered by two or more partners.

Collaborative Recruitment and Cross Referral Process

System partners co-located at the AJCCs have agreed to:

- A standard initial intake process;
- Use of CalJOBS; and
- A common process for cross-referring applicants and participants across partners and programs.

These processes promote consistency when gathering and recording customer information and matching job seekers to resources that may meet their needs. A common referral form authorizes the release of basic information, which facilitates the co-enrollment of participants and co-case management by system partners.

Co-Enrollment of Job Seekers

Assessment of WIOA Title I program participants (and individuals being served by other programs) is the first step in determining the services an individual needs to prepare for employment. This process, which includes the development of an individual employment plan, reveals a participant's basic skill levels, past education attainment, job-specific skills, work history, special skills and abilities, life circumstances, and potential barriers to employment. To address job/career goals and barriers, staff may suggest services that are available through WIOA and from other programs, which are operated by system partners. A referral is made to the partner(s) identified as capable of providing the required service(s), thereby triggering a co-enrollment. If the partner utilizes CalJOBS, the co-enrollment status is recorded in the system. If not, the partners share information, as permissible and practicable.

While WDB management and direct services staff are familiar with recently published state guidance on strategic co-enrollment of WIOA participants in other programs, many of the local partners have been collaborating for decades on providing services to job seekers. A few examples of these efforts with one-stop partners and local stakeholders include the following:

- Veterans seeking WIOA services often have a wide range of needs, including various health-related matters. Therefore, they may be referred to services provided by the U.S. Department of Veterans Affairs' Imperial Valley Clinic, Imperial County Behavioral Health Services, or DOR.
- Job seekers who have not earned a high school diploma or equivalency are commonly co-enrolled in programs offered by the Central Union High School District and other adult education providers.
- Job Seekers with disabilities regularly apply for employment services provided by the AJCCs. When a customer requires support in terms of assistive technology or other accommodations to be able to participate in training or to qualify for employment, he or she will be referred to DOR, which frequently co-enrolls such individuals to provide necessary supportive services.
- Individuals participating in training funded by TAA may be co-enrolled in WIOA Title I services, through which they will receive case management, supportive services, job readiness training, job placement assistance, and other services that complement those they are receiving under the Trade Adjustment program.
- Youth and young adults who are seeking skills training, employment services, assistance in completing high school and other services, are provided information on WIOA and other local programs geared towards younger individuals. Many clients between the ages of 16-24 are referred to the San Diego Job Corps center, where they participate in multiple services and activities that will help them complete their secondary education and prepare for a career. As they are completing Job Corps services, individuals returning to Imperial County may be co-enrolled in WIOA services for assistance in finding employment related to the skills they have acquired in Job Corps.

Case Management

Partners that have access to CalJOBS can share data and intake information after securing the informed consent of a common customer. This allows staff from two or more programs to track progress that has been recorded in CalJOBS. Not all partners use CalJOBS. In these cases, the partners agree to a process (and often a schedule) for communicating about a client's progress by phone, email, and a selective sharing of records.

Cross-Training of System Partners and Coordination of Partner-Led Events

The more that partner staff knows about other programs, the greater the chance that effective referrals will be made, including those leading to co-enrollment. Cross training sessions are conducted as part of regularly scheduled meetings with the AJCC Operator. These discussions ensure that all WIOA staff and partners remain up to date on programs and services. Partners meetings also provide a venue for agencies to work together to plan coordinated job fairs, workshops, and business outreach, along with other multi-agency strategies.

One-Stop System's Use of Technology and Other Remote Strategies

Imperial County is home to approximately 180,000 residents, who primarily live and work within its incorporated seven geographically dispersed cities (Brawley, Calexico, Calipatria, El Centro, Holtville, Imperial and Westmorland) and eight widespread unincorporated communities (Bombay Beach, Heber, Niland, Ocotillo, Palo Verde, Salton City, Seeley, and Winterhaven). The county is the ninth largest in California, encompassing 4,284 square miles. Due to the size of the county and its scattered population centers, many individuals living in remote communities regularly travel an hour or more to access public services. Compounding this hardship is that fact that many people living in these areas are low-income and have limited access to transportation. The WDB and the workforce system partners continue to work to make employment, education, training, and related services accessible to remote communities.

Remote Service Delivery Sites

There are currently two satellite AJCC locations serving remote areas: Winterhaven in the far eastern part of the county, and Calipatria, in the north-central region of the county. At these locations, individuals have access to computers in order to conduct searches using CalJOBS, work on resumes, and access resources to prepare for interviews. Because of its proximity to the Arizona border, individuals in Winterhaven also frequently access workforce development and other services in Yuma. To support residents of several small communities that dot the western shoreline of the Salton Sea, the WDB periodically conducts job fairs in Salton City.

Technology Resources to Communicate with Remote Customers

Over the last several years, the WDB has been working to enhance virtual services, in part, to increase access for individuals who live beyond a reasonable commuting distance to an AJCC. Given the restrictions brought about by the pandemic, workforce staff has accelerated efforts to bring more information and services online.

Various methods for providing and enabling services other than in-person, include the following:

Telephone: Appointments with AJCC staff can be conducted via telephone. If an individual does not have access to a telephone, referrals can be made to local community service agencies to obtain one.

The WDB Website: The WDB is currently in the process of updating its website. Because of this update, businesses will be able to post jobs online more easily, thereby making these listings more accessible to job seekers. In addition, new features will enable participants to submit applications online. The WDB is procuring workshops and webinars that will further expand online offerings, such as sessions on resume building and interviewing skills.

Zoom: System partners and AJCC staff use Zoom and other videoconferencing platforms to conduct meetings and facilitate one-on-one conversations.

Social Media: The Imperial County Workforce and Economic Development Office has an active Facebook page in order to keep the public up to date on services available to the public.

Electronic signatures: The AJCCs accept electronic signatures on some documentation in order to avoid face-to-face contact.

Technology Access: Principally in response to COVID-19, the WDB and workforce system partners have assisted job seekers who lack hardware and/or internet access in obtaining laptop computers and hot spots.

System Partners' Efforts to Serve Customers in Remote Communities

Many AJCC partners have increased their reliance on technology and are delivering most services online. This has increased the availability of services in remote areas. As some services are better suited to in-person service delivery, some partner agencies are providing such services by appointment basis. Examples of approaches that partners are using to increase web-based and other remote services include the following:

- CET, the Migrant and Seasonal Farmworker program grantee, can provide shuttle service to the El Centro campus.
- EDD staff makes weekly visits to the Winterhaven AJCC, and makes scheduled visits to CBO locations, partner offices, and employer sites in remote communities. Zoom or Adobe Connect workshops and one-on-one sessions with staff are now available to customers.
- Central Union High School's adult education program is providing GED services online.

- The Public Administrator’s Area Agency on Aging, which operates the SCSEP program, serves seniors throughout all of Imperial County. It clients, who are 55+, prefer phone, email, and FaceTime for remote communications.
- Imperial County Department of Social Services supports a multi-access system with regional offices. It also outstations staff at Family Resource Centers in remote communities and reaches outlying rural areas through a mobile unit. In addition, the department’s transitional services can be accessed in-person, by phone, and online.
- DOR uses a variety of technological strategies to deliver services to individuals in remote areas. These include the use of Zoom, FaceTime, DUO, MS Teams, and email to provide virtual services including: orientation; intake and assessment; eligibility determination; developing Individual Plans of Employment (IPEs); and other Vocational Rehabilitation services.

Coordination of Workforce Activities and Support Services

Supportive services are made available to eligible individuals enrolled in the WIOA Adult, Dislocated Worker, and Youth programs. Supportive services are provided to address a participant’s needs and barriers as identified during initial and on-going individual assessment processes. Services are provided to enable an individual to participate in activities authorized under WIOA Title I. To qualify for WIOA-funded support, all efforts to secure supportive services from other sources must first be exhausted and documented in the participant’s case file.

Determining the Need for WIOA-Fund Supportive Services

WIOA Title I supportive services are only provided when they are determined to be necessary, reasonable and allowable. The need for supportive services must be based on an objective assessment and must be described and justified in an Individual Employment Plan for adults and an Individual Development Plan (IDP) for youth. To receive services:

- An individual must be participating in a program with activities authorized under WIOA. Priority of services is established at the time of eligibility determination.
- An individual is unable to obtain supportive services through other programs.
- A Supportive Services Request Form has been completed.

Participants can receive a lifetime maximum of \$1,500 in WIOA-funded supportive services. The limit may be exceeded only following a documented needs assessment and approval by the WDB Director. Childcare expenses are not included in the lifetime limit and are calculated separately.

Services Available to WIOA Participants

A wide range of supportive services is available to participants, including:

Transportation assistance is available for individuals participating in training and job search. Transportation expenses for eligible WIOA participants, including round trip expenses to and from a childcare provider, are authorized, but limited to usual and customary public/community transportation, such as bus lines, or on a mileage reimbursement basis. Supportive services for transportation may continue to assist a participant in retaining employment no longer than the point of exit from the program.

Housing Assistance: Only under extraordinary circumstances may supportive services be used to pay for housing. Such circumstances may include a notice of eviction or a complaint filed in a local court of law. Funds may only be used to pay monthly rental costs.

Ancillary Expenses: These include costs necessary to participate in services, such as books, tools, clothing, background checks, testing fees, application fees, drug tests and other costs. An ancillary expense may also include those costs directly related to obtaining employment, including clothing, an employment-related physical or eye exam, or eyeglasses.

Child Care Assistance: Participants with children 12 years or younger are eligible for childcare when it is determined other funding sources are not available to pay for such services.

Covid-19-Related Support Services are currently available. These services may be provided to individuals impacted by COVID-19, with an emphasis on underserved populations. Services include, but are not limited to, equipment necessary to telework (e.g., computer, internet access) housing assistance, utility assistance, childcare assistance, and transportation assistance. Supportive services are available in two tiers:

1. Individuals receiving at least 50% of their previous wages either from their employer directly, or with Unemployment Insurance (UI) payments, may receive supportive services totaling up to \$400.
2. Individuals who are not receiving at least 50% of their wages from their employer directly, or with UI payments, may receive supportive services totaling up to \$800.

Physical and Programmatic Accessibility for Individuals with Disabilities

Imperial County WDB ensures contracts, cooperative agreements, job training plans, policies, and procedures are ADA compliant and fully meet the nondiscrimination and equal opportunity provisions of WIOA. The WDB has a designated Equal Opportunity (EO) Officer, who is responsible for coordinating its obligations under these regulations.

The EO Officer's responsibilities include the following:

- Serving as the liaison with the EDD EEO Office.
- Investigating and monitoring the Local Area's and its sub-recipients' WIOA Title I funded activities and programs.

- Reviewing the Local Area’s organizations and its sub-recipients’ written policies.
- Developing, publishing, and enforcing the Local Area’s discrimination complaint procedures.
- Conducting outreach and education about equal opportunity and nondiscrimination requirements and how an individual may file a complaint.
- Participating in continuing training and education.
- Informing participants, employees, and program beneficiaries of their equal opportunity rights and responsibilities, and how the discrimination complaint process works.
- Establishing a logging system to record discrimination complaints.
- Providing a copy of the complaint log annually to the EDD EEO Office.
- Developing and publishing procedures (including alternative dispute resolution) for resolving allegations for noncompliance with applicable nondiscrimination and equal opportunity provisions.
- Developing and publishing procedures for resolving allegations against service providers for noncompliance with applicable nondiscrimination and equal opportunity provisions.

All clients are notified of the “Equal Opportunity Law” along with the right to file a complaint under “What to do If You Believe You Have Experienced Discrimination.” The Discrimination Complaint Form is readily available to customers. This information is shared with clients during initial meetings, as well as during new participant and new employer orientations, whether they be conducted in person, via telephone, or through teleconference. The WDB ensures that, during presentations, individuals are notified of their rights and responsibilities under the nondiscrimination and equal opportunity provisions of WIOA, including a right to file a complaint with the WDB or the Director of the DOL’s Civil Rights Center. Contact information is provided to clients.

Accessibility for Persons with Disabilities

All AJCC buildings are ADA compliant. The WDB ensures that all new facilities or alterations will comply with the applicable federal accessibility standards, such as the *ADA Standards for Accessible Design* (1991 or 2010) or the *Uniform Federal Accessibility Standards*. No qualified individual with a disability is excluded from participation in or denied the benefits of a recipient’s service, program, or activity or is subjected to discrimination because the facilities are inaccessible or unusable by individuals with disabilities. The WDB permits individuals with mobility disabilities to use wheelchairs and manually powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities, in any areas open to pedestrian use.

The WDB ensures that all WIOA-funded programs and activities are programmatically accessible. This includes providing reasonable accommodations for individuals with disabilities, making reasonable modifications to policies, practices, and procedures, administering programs in the most integrated setting appropriate, communicating with persons with disabilities as effectively as with others, and providing appropriate auxiliary

aids or services, including assistive technology devices and services, when necessary to afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits of programs or activities.

Assistive Technology and Accessible Materials

The WDB informs customers that auxiliary aids and services for individuals with disabilities are available upon request. Language assistance (oral or written) is available at all AJCC locations. Interpretation services (in person and via phone) and Braille services are also available.

Computer workstations can be adjusted to larger fonts when needed. Printed materials indicate that AJCCs and the WDB may be reached by voice telephone and provide the TTY number. Additionally, the WDB ensures that all publications in the news media, on the county website, or social media pages are ADA compliant. For example, when a picture or PDF is published online, the WDB provides a detailed description following the image.

Imperial County has identified the need for more assistive technology devices for individuals with disabilities. Priorities include touch screen monitors, more adjustable workstations, speech recognition software, narrators on computers, and Braille Sense Plus and translator. These devices will be operational in the AJCCs no later than the next fiscal year.

Staff Training

Staff participate in yearly training on the Equal Opportunity Law, nondiscrimination and equal opportunity policy, and the LEP Plan. The WDB is in the process of updating the training program regarding Equal Opportunity Procedures and the Limited English Proficiency Plan, as these policies were recently updated in accordance to state mandates. Annual training includes disability awareness and etiquette, effective communication strategies, access to technology, access to employment, racial equity, dealing with individuals who are LEP, and reinforcing the LEP Plan. These training sessions are vital for staff to effectively work with customers and connect them with the best services available. The WDB is seeking to secure outside training providers and is exploring the available trainings through the California Workforce Association.

III. STATE STRATEGIC PARTNER COORDINATION

In 2018, the State completed and published a biennial modification to California's Unified Strategic Workforce Development Plan for Program Years 2016-19. Within this modification, the California Workforce Development Board identified several new strategic partnerships with state-level agencies and initiatives. Guidance issued by the State Board in 2018 to Local Boards regarding two-year modifications to their PY 17-20 Plans required that WDBs pursue these partnerships within their jurisdictions. In our 2019 modification to the Local Plan, Imperial County WDB described these local level relationships, some of which were in an early stage of development. Following is a summary of the evolution of these strategic partnerships as well as approaches under consideration to further strengthen collaboration with local providers and programs.

Coordination with County Human Services Agency and Other Local Partners That Serve Individuals Accessing CalFresh Employment and Training Services

The Imperial County Department of Social Services (DSS) is responsible for CalWORKS and other public welfare programs, including: Medi-Cal, Welfare to Work, General Assistance, and CalFresh. DSS is a one-stop partner and, therefore, is part of the network of agencies that comprise the local workforce development delivery system. CalFresh participants are diverse. They include families, some led by single parents, and individuals. Many are unemployed, while others are low wage earners. In Imperial County, many CalFresh participants live in poverty and rely on other forms of public assistance and social support services. Because the group consists of individuals with many distinct needs, participants are served by all types of educational resources, social services, and support organizations in the county, including the AJCC.

Engagement with DSS during the planning process for Imperial County WDB's development of the 2019 Modification to our PY 2017-20 Local Plan revealed DSS had not yet implemented a CalFresh E&T program. DSS representatives indicated that, at that point, the department had developed only a basic blueprint for what the program might look like in Imperial County. DSS had engaged with State CalFresh E&T program leadership to discuss options and had formulated some ideas for the program design. It was based on the benefits that such a program would provide to CalFresh recipients and the opportunities it would create to access the 50% reimbursement for the use of non-federal funds for allowable activities provided to eligible individuals. DSS identified opportunities for a partnership with various programs operated by Imperial Valley College that looked to be well suited to the target population. DSS representatives stated that, in 2019, the agency intended to expand upon its basic concept and develop plans for a fully functional program design that could include either department-administered services or a model using a third-party provider, such as the college.

Progress on the CalFresh E&T Program and Plans Moving Forward

At this time, Imperial County DSS has yet to implement a CalFresh E&T program. At the start of 2019, the WDB was working with the local community college to administer this

program. However, the college expressed some hesitation about the program and decided not to move forward. DSS is continuing to explore options for implementing the program, and the WDB remains supportive of these efforts. Due to the pandemic, efforts to develop and implement the program have slowed. However, with the expectation that reopening will ramp up in the coming months, it is likely that these plans will accelerate in the new Program Year.

The WDB and DSS continue to work together successfully on various projects. In 2019, the CalWORKs staff collaborated with the AJCCs to offer “Project Future” Expanded Subsidized Employment Services to CalWORKs customers. Project Future services provide employment, training and career building opportunities. This contract benefitted clients by providing Medical Administrative Assistant vocational training to seven customers, who all received national certification as Certified Medical Administrative Assistant. Fourteen customers secured unsubsidized employment. Twelve of these customers transitioned off CalWORKs Program. In sum, 82% of the customers enrolled in Project Future experienced positive economic benefits to their households, built a career pathway, and obtained unsubsidized employment.

Coordination with Local Child Support Agency and Other Local Partners Serving Individuals That Are Non-Custodial Parents

During the 2019 development of the biennial Modification to the Local Plan, the WDB and Imperial County Child Support Services (CSS) agreed to formalize and further structure their existing relationship. This enhancement to the workforce system’s partnership with CSS represented an extension of an existing relationship among the WDB, the AJCCs, and Child Support. For many years, referrals had been made from Child Support to the AJCCs pursuant to court orders requiring non-custodial parents (NCPs) to participate in job search in exchange for credit in meeting specified obligations and the reinstatement of revoked licenses. While this approach had yielded some success, CSS and the WDB agreed to develop an MOU outlining a structured relationship for cross-referrals. The WDB, CSS, and the entire network of one-stop partners expressed their full commitment to using the MOU to build a stronger partnership to improve employment outcomes for NCPs with child support orders.

Progress on Development of the MOU between the WDB and CSS

Due to the global pandemic, the MOU was never executed. A goal for this MOU would have been to have a designated staff liaison at the AJCC locations to communicate with child support clients. A draft agreement describes a process for serving CSS clients. Like all AJCC clients, they would be provided information regarding available services and an assessment would be conducted in order to determine what supportive services are needed for the non-custodial parent. Child support clients would need to sign a *Release of Information* to allow information sharing between organizations.

Current Collaboration between the WDB and Child Support and Plan Going Forward

The WDB and CSS are currently making cross referrals and are working together on a regular basis. CSS refers clients to the AJCCs for workforce services. Child Support clients are tracked by WDB staff and information is shared with the CSS case manager. AJCC staff work with clients to develop short-, mid- and long-range employment goals. As the client is participating in services, the case manager follows-up with service providers (e.g., schools, support agencies) to track progress. Staff from both agencies regularly follow-up with clients through their completion of services.

The relationship with CSS has been very successful, with many child support clients completing training and obtaining employment, moving them toward a living wage. Leaders at CSS and the WDB believe that the formalization of the relationship should move forward and, as the pandemic subsides, will work to execute and implement the MOU.

Coordination with Local Partnership Agreement Partners Established in Alignment with the Competitive Integrated Employment Blueprint and Other Local Partners That Serve Individuals with Developmental and Intellectual Disabilities.

As the Imperial County WDB convened local stakeholders to support the development of the 2019 Modification to our Local Plan, WDB leadership and staff first became aware of the state-level blueprint for competitive integrated employment (CIE) that was crafted by and led to the formalization of a partnership among DOR, the California Department of Development Services (DDS) and the California Department of Education (CDE). An agreement among the partners makes employment in an integrated setting at a competitive wage for individuals with intellectual disabilities and developmental disabilities (ID/DD) its highest priority. We also learned of the requirement that local agencies representing the state level partners develop agreements to meet CIE goals. State Workforce Board guidance indicated that local boards must connect to these partnerships to support CIE objectives. The following information summarizes the WDB's plans for moving the collaboration with the LPA partners forward.

Imperial County Local Partnership Agreement

An LPA has been implemented in Imperial County. The purpose of the Imperial County Local Partnership Agreement (ICLPA) is to enhance and strengthen partnerships that promote career preparation and successful placement of youth and adults with disabilities into competitive, integrated employment. This primarily includes youth and adults identified as having an intellectual and/or developmental disability and may include others whose disability creates similar barriers to employment. The participating core partners are:

- El Centro Branch of the California Department of Rehabilitation (DOR)
- San Diego Regional Center (SDRC)
- Imperial County SELPA (Special Education Local Plan Area), which is a consortium

formed by 17 school districts: Brawley Elementary School District, Brawley Union High School District, Calexico Unified School District, Calipatria Unified School District, Central Union High School District, El Centro Elementary School District, Heber School District, Holtville Unified School District, Imperial County Office of Education, Imperial Unified School District, Magnolia Union School District, McCabe Union School District, Meadows Union School District, Mulberry School District, San Pasqual Valley Unified School District, Seeley Union School District, and Westmorland Union School District.

The ICLPA also identifies community partners, which are defined as local entities whose mission, goals, and primary purpose are aligned with that of the ICLPA, thereby increasing opportunities for youth and adults with disabilities to be successfully employed in an integrated setting while earning a competitive wage, and in a career or job that meets their vocational desires or goals. Among the community partners listed in the LPA is the *America's Job & Career Center System*.

Current Collaboration with the LPA Partners

Imperial County WDB and AJCC representatives currently collaborate with DOR to serve customers with disabilities. Supporting DOR's and the LPA's business outreach efforts to expand the use of CIE would be a natural extension of our current, productive working relationship. WDB staff has envisioned being able to support DOR's efforts in several ways. These include:

- Identifying businesses within the County that employ individuals in jobs that would be suitable for CIE, ensuring that opportunities are identified that complement the various capabilities of individuals in the ID/DD target group;
- Developing a CIE-specific business outreach plan for the County;
- Establishing a unified strategy for promoting CIE candidates to local businesses, again taking into consideration individual capabilities and needs;
- Making direct contact with business representatives on behalf of LPA customers; and
- Orienting employers to CIE, developing a work-based learning agreement and ensuring the necessary services and supports are in place to promote successful job placement.

Moving Forward

Recent communication from DOR representatives indicate that the WDB can assist the LPA partners in identifying, developing, and securing agreements with local businesses willing to provide employment opportunities for customers with ID/DD. While COVID has significantly restricted operations, WDB representatives will work with DOR to formalize our work in support of LPA goals.

Imperial County WDB staff and managers and staff representing the system partners have expressed interest in training from the LPA partners about the workforce-related needs and barriers of individuals with ID and DD, as the workforce system, overall, has

limited experience working with this target group. The local board and its partners have significant experience serving individuals with disabilities, but many providers acknowledge the need for CIE-specific training. The partners identified several topics for training. These include navigating the workforce system on behalf of individuals with disabilities; primer in disabilities resources for employment and related services; understanding reasonable accommodations; managing family dynamics; working with clients through adult transition; and understanding social security benefits and the effect of employment on these benefits. DOR representatives have indicated that the agency's Work Incentive Planner can provide training on working with individuals receiving SSI or SSA to understand the impact of employment on these benefits.

Coordination with Community-Based Organizations and Other Local Partners That Serve Individuals Who are English Language Learners, Foreign Born, and/or Refugees

In Imperial County, more than eighty-five percent of the population is Hispanic or Latino, with nearly a third being foreign born. Imperial County offers extensive services to individuals who are English language learners (ELL) to ensure they have equal access to programs. All staff is trained on the WDB's Limited English Proficiency (LEP) Plan in order to ensure identified ELL individuals receive necessary language skills training along with other workforce services.

Based on the demographic composition of Imperial County, Spanish is the only language other than English spoken by a significant portion of residents. Several bilingual staff members are available at the AJCCs at all times and all written documents are available in Spanish. While our staff is sensitive to the needs of ELLs, we also understand the importance of providing training in order to improve English language skills. Acquisition of English fluency is critical to workers' opportunities for better jobs and higher wages that will lead to self-sufficiency. Our local workforce development strategy emphasizes the importance of studying English concurrent with training for and securing employment.

Collaboration with Public and Private Partners to Serve ELLs and Immigrants

Because such a large percentage of the population is made up of immigrants, many of whom are ELLs, serving this population is central to the work of the WDB, the AJCCs, and local workforce system partners. AJCC staff works closely with many local agencies to secure support services for customers.

Public agencies are critical partners in providing support services to job seekers served by the AJCCs and other organizations that make up the local workforce development system. Among these are the county's Department of Social Services; Public Health Department; Behavioral Health Department; Imperial Valley Transit; and the Imperial Valley Housing Authority. Supplementing these services is a network of non-profit organizations including: Imperial Valley Food Bank; the LGBT Center; SER-Jobs for Progress; United Way; Calexico Neighborhood House; and the Sister Evelyn Mourey Center, which provide a wide range of support services, such as emergency shelter, food

and clothing. Faith-based organizations are also crucial partners. Justice for Our Neighbors, a project of the United Methodist Immigration Ministry, provides services, such as legal assistance to the asylum-seekers and undocumented children.

Some examples of the critical forms of services and support provided to ELLs and immigrants by system partners include the following:

Center for Employment Training: CET, which administers the WIOA Section 167 Migrant and Seasonal Farmworker grant program, offers ESL services and assistance to clients earning a GED. CET has also had great success in securing employment for participants in jobs that lead to self-sufficiency wages. While many participants may not have a high school education, CET works with those who have a high school degree from Mexico, accepting a *Certificado de Preparatoria* as a substitute for a high school diploma. CET is very active within the AJCCs, with representatives constantly communicating with our AJCC staff so they remain aware of the programs CET offers.

Office of Education: The Imperial County Office of Education (ICOE) is the leader of the adult education consortium consisting of Brawley Union High School District, Calexico Unified School District, Calipatria Unified School District, Central Union High School District, Holtville Union School District, Imperial Unified School District, Imperial Valley College District, ICOE Alternative Education/Imperial County Jail and San Pasqual Unified School District. Services offered by the Consortium are ESL, Career Technical Education Courses, Bus Driver Courses, Medical Classes and Welding Classes. Consortium agencies assist individuals in obtaining a High School Diploma or GED. Staff also provides students with career and education counseling. The WDB works closely with Central Union High School, as it is an MOU partner. However, WDB staff also works with other education partners across the county. This collaboration with all adult education providers enables AJCC staff to refer clients to services in and around their communities.

Sister Evelyn Mourey Center: The non-profit Sister Evelyn Mourey Center (SEMC) places an emphasis on serving individuals and immigrant families with language barriers. Imperial County is home to many individuals who were born in Mexico and only speak Spanish. The AJCCs refer individuals to the Evelyn Mourey Center when clients are in need of daily translation services. SEMC assists families and individuals with various applications. These can include job applications or applications for services, such as electricity or prescriptions for eyeglasses.

SEMC staff makes daily presentations to customers, which are offered in both English and Spanish, to make participants aware of current issues and services in the community. Topics have included women's health, diabetes, family nutrition, financial literacy, and community resources available through local providers.

The SEMC is a partner with Central Union High School District's Adult Education and offers access to ESL classes. These classes assist with reading, writing and conversational skills to help students qualify for better job opportunities. Each individual is evaluated and placed in an appropriate level of instruction from beginning, intermediate,

to advanced. SEMC hosts English Conversational Groups to assist individuals in practicing their speaking skills. SEMC also collaborates with Imperial Valley College to provide access to Computer Literacy Classes. The goal of these classes is to provide fundamental computer skills that increase participants' access to job opportunities and higher education.

As many in this population are non-citizens, the SEMC offers a citizenship class. SEMC stresses that obtaining U.S. citizenship is critical for many low-income populations in order to receive benefits and obtain better jobs. SEMC classes assist individuals to prepare and pass the citizenship test.

Woman Haven (aka The Center for Family Solutions): Woman Haven has a very close relationship with the WDB, as well as other agencies in the community. Many Woman Haven clients have little or no work experience and do not speak English. Some clients may have left an abusive relationship in Mexico and are looking to start a new life for themselves and their families. Woman Haven will often make referrals for clients to attend ESL or citizenship classes. The agency aims to assist their clients with skill building for day-to-day life and to obtain jobs to care for their families. Woman Haven offers computer skills programs, which helps clients prepare for employment. Many clients also receive services from local agencies such as County Behavioral Health, legal services, and the AJCCs.

Justice for our Neighbors: The organization provides low cost immigration and legal services to low-income immigrants, refugees and asylum seekers. Staff assists clients with obtaining authorization to work. Once authorized, these individuals can receive services from many other local agencies. The AJCCs can refer them to obtain their GED, attend ESL classes, and participate in programs to obtain their citizenship.

An Evolving Partnership

Since the WDB's development of the 2019 Modification to the Local Plan, the relationships among the WDB, AJCCs, one-stop system partners, and local community agencies have grown stronger. System partners and local stakeholders collaborate more effectively than ever before in assisting ELLs and immigrants in meeting their education and employment goals.

IV. WIOA TITLE I COORDINATION

The following narrative addresses services, activities, and administrative requirements of the Imperial County WDB under the WIOA Title I formula programs, along with strategies for staff preparation, training, and ongoing professional development to effectively respond to participant needs.

Staff Training and Professional Development to Increase Digital Technology Skills

Most WDB and AJCC staff currently demonstrate moderate to high competency levels in the use of digital technology in their daily performance of job duties, which include assisting job seekers in understanding and using hardware, software, and web-based applications and platforms. In response to the pandemic and the subsequent workplace adjustments, training on the following technology-related topics has been provided:

- Using Zoom for meetings and one-on-one interactions;
- CalJOBS uses and functionalities; and
- Retrieving and storing files while engaged in remote work.

To ensure that AJCC staff members are fully prepared to not only meet the requirements of their own jobs, but also support customers who will be increasingly reliant on the use of digital skills in the workplace, Imperial County WDB will create opportunities for staff members to improve and/or remain up-to-date with their work-related digital/technology skills. WDB management is currently examining opportunities available through LinkedIn Learning, which has a catalog of hundreds of courses that could meet the technological needs of our staff.

Frontline Staff Training and Professional Development to Increase Cultural Competency and Effectiveness in Working with Individuals and Groups that Have Been Exposed to Trauma

Imperial County WDB encourages and supports staff development. Training is frequently made available to staff to increase their awareness and knowledge on matters related to service delivery and compliance. However, training is also provided on topics that increase staff's effectiveness in serving key customers, including job seekers and businesses. Training of this type is especially important for frontline team members who work directly with customers.

Topics dealing with cultural competency and trauma-exposed populations that would likely be beneficial to frontline staff may include:

- Equity, Diversity and Inclusion
- Cultural Bias
- Cultural Humility
- Understanding Trauma

- Signs of Depression
- Recognizing Post-Traumatic Stress
- Justice Informed Employment Retention
- Serving the LGBTQ Community
- Building Resiliency in Communities
- Mental Health Awareness
- Sexual Harassment
- Domestic Violence & Immigration
- Gender and Sexual Identity

Moving into the four-year period covered by this Local Plan, Imperial County WDB will continue to look for trainings that will increase staff knowledge and effectiveness in the area of cultural competency and in working with individuals who have experienced and are living with the effects of trauma. We anticipate that the California Training Initiative, which is hosted by CWA, will procure qualified trainers to address these topics.

Coordination of Rapid Response and Layoff Aversion Activities

Imperial County WDB has been providing Rapid Response services to displaced workers for more than 30 years. Working with state and local partners, AJCC Business Services staff provides the following Rapid Response and Layoff Aversion services.

Layoff Aversion Services

The Rapid Response Coordinator works closely with state and local agencies (such as the Imperial Valley Economic Development Corporation, the Small Business Development Center, and the local Chamber of Commerce) to monitor the health of businesses and leverage relationships to support continued business operations. Upon receipt of a WARN notice or other information indicating a company is experiencing hardship, the Coordinator makes immediate contact with the company to propose Layoff Aversion assistance.

Business Services staff has established ongoing relationships with local employers, creating an environment that enables them to provide services to business in order to prevent or reduce layoffs. Layoff aversion tools and strategies that are used to support businesses in distress include economic analysis, incumbent worker training, Trade Adjustment Assistance programs, EDD's Work Share Program, and various forms of work-based training.

Rapid Response Services

When the Business Services Coordinator receives a WARN notice or similar communication regarding a business closure or significant layoff, the business is contacted to verify the information provided in the notice. If this notice is active, our staff will start coordinating a Response Orientation for affected employees. Typically, these orientations are held at the business site (if the business is still operating). Once a date

and time for the orientation is confirmed, members of the Rapid Response Team are contacted, which is led by staff from the AJCCs and EDD. During the orientation, the team disseminates information about the WIOA Dislocated Worker Program and Unemployment Insurance benefits. Depending on the nature of the layoff, dislocated workers may be eligible for a wide range of other services. If the dislocation is a result of foreign competition or foreign relocations, workers may be eligible for assistance, including income support, job search assistance/relocation, and/or training under the TAA Program.

The Imperial County WDB collaborates with various agencies to bring as many services as possible to workers that have been laid off. Such agencies include the Department of Social Services, Inland Fair Housing and Mediation Board, the Imperial Valley Food Bank, Center for Employment Training, Imperial County Behavioral Health, Imperial County Child Support Services, and DOR.

At times, WARN notices are received late and business are no longer operating. When this occurs, Business Services staff work with EDD to locate affected workers through their RESEA activities.

Response to COVID-Related Worker Displacement

The WDB has expanded Rapid Response and Layoff Aversion activities through a Small Business COVID-19 Layoff Aversion Grant fund for local businesses that have been experiencing economic hardships because of the pandemic and the health orders that have required certain businesses to close. The grant fund reimburses companies for the cost of PPE and telework equipment and offers other creative approaches that enable businesses to adjust operations in a way that results in employee retention.

<h3>Services and Activities Available under WIOA Title I Adult and Dislocated Worker Programs</h3>

Imperial County WDB provides an extensive set of services for job seekers enrolled under the WIOA Title I Adult and Dislocated Worker programs. Services meet the needs of individuals with varying levels of education and work experience, including job seekers from vulnerable populations who may have one or more barriers to employment. Services are designed to prepare participants for entry-level and higher positions with businesses in Imperial County, including those in priority sectors that are identified in the Southern Border Regional Planning Unit's PY 2021-24 Regional Plan.

Service Delivery through the AJCCs

The delivery of career services at Imperial County WDB's five AJCCs takes place alongside a wide range of training and services provided by the one-stop partners. Customers may participate exclusively in basic career services, or may need additional assistance and be subsequently enrolled in individualized career services.

The WDB's AJCC system includes three comprehensive AJCCs (Brawley, Calexico and El Centro) and two satellite centers (Calipatria and Winterhaven).

Registration and Enrollment in Adult and Dislocated Worker Programs

Adults and dislocated workers who receive services funded under WIOA Title I are registered following a certification of eligibility and are classified as participants. For an individual to be register into a WIOA program, the following must occur:

- The individual must complete the application/eligibility determination process;
- The individual must provide the documentation required to substantiate his/her eligibility; and
- An appropriate activity code for the individual must be entered into CalJOBS system.

Career Services for Adult and Dislocated Worker Participants

WIOA Title I Adult and Dislocated Worker Program basic and career services are available to job seekers using any of the WDB's five AJCCs.

Basic Career Services: WIOA basic career services include the following:

- Determinations of whether the individual is eligible to receive assistance from the adult, dislocated worker, or youth programs.
- Outreach, intake (including identification through the state's Worker Profiling and Reemployment Services system of unemployment insurance claimants likely to exhaust benefits), and orientation to information and other services available through the one-stop delivery system.
- Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service needs.
- Labor exchange services, including the following: job search and placement assistance, and, when needed by an individual, career counseling; provision of information on in-demand industry sectors and occupations; provision of information on nontraditional employment; and provision of referrals to and coordination of activities with other programs and services, including those 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 national labor market areas, including the following: job vacancy listings in labor market areas; information on the job skills necessary to obtain the vacant jobs listed; and information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for those jobs.
- Provision of performance information and program cost information on eligible providers of training services by program and type of providers.

- Provision of information about how Imperial County 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 relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance, including child care; child support; medical or child health assistance available through the state's Medicaid program and Children's Health Insurance Program; benefits under the SNAP program; assistance through the earned income tax credit; housing counseling and assistance services sponsored through the U.S. Department of Housing and Urban Development; and assistance under the CalWORKS program along with supportive services and transportation provided through that program.
- Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA.
- Provision of information and assistance regarding filing claims under UI programs, including meaningful assistance to individuals seeking assistance in filing a claim.

Individualized Career Services: WIOA individualized career services consist of the following:

- Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include the following: diagnostic testing and use of other assessment tools; and In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals.
- Development of an individual employment plan to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of, and information about, eligible training providers.
- Group and/or individual counseling and mentoring.
- Career planning (e.g., case management).
- Short-term pre-vocational services, including the development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training. In some instances, pre-apprenticeship programs may be considered as short-term pre-vocational services.
- Internships and work experiences that are linked to careers.
- Workforce preparation activities that help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, training, or employment.
- Financial literacy services.
- Out-of-area job search assistance and relocation assistance.
- English language acquisition and integrated education and training programs.

Training Services

Participants who require training to qualify for employment can take advantage of several options. WIOA training services include the following:

- Occupational skills training, including training for nontraditional employment.
- On-the-job training.
- Incumbent worker training.
- Programs that combine workplace training with related instruction, which may include cooperative education programs.
- Training programs operated by the private sector.
- Skill upgrading and retraining.
- Entrepreneurial training.
- Transitional jobs.
- Job readiness training provided in combination with another training service.
- Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with another training service.
- Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

The WDB has been working to expand its Eligible Training Provider List (ETPL) for commercially available, off-the-shelf training programs. Eligible job seekers that enroll in a training program provided by those on the ETPL are able to have their services paid for by the WDB through the use of an individual training account (ITA) for program costs up to \$12,500. If program costs exceed \$12,500, the participant must find additional sources of funding to cover the remaining costs. Training currently available through ITAs includes:

- IVROP- Security Guard with firearm
- IVROP- Security Guard without Firearm
- IVROP- CNA
- IVROP- Truck Driving with Hazmat
- IVROP- Certified Medical Assistant
- Learning Institute of Southern California - Barber Program
- Imperial Valley Electrical Training Center - Apprenticeship
- CET Welding Fabrication
- CET Truck Driver (Regular)
- CET Truck Driver (I)
- CET Green Building
- New Horizons Adobe - Microsoft Certified Application Program
- New Horizons Data Analyst
- New Horizons IT Network Support Specialist

Contract and Specialized Training

Of the various work-based learning programs indicated above, on-the-job training is the most commonly used. Other contract training includes specialized programs, such as the

RN Mentorship Program. This has been one of the Imperial County WDB's most successful training programs with an average of 90% to 100% overall job placement across the last several years. It caters to fourth semester nursing students that are completing their RN certification and are in need of supportive assistance. The program serves approximately 30-35 nursing students with mentoring services to assist them in finishing their last semester successfully. The services include assistance with the purchase of medical instruments, books, and the National Council Licensure Examination (NCLEX). Additionally, the students will receive preparation for entering the workforce, job search tools, training for interviews, other soft skills guidance, and follow-up services for up to 12 months.

Priority of Service

Priority of service must be given to recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient. Basic career services are not subject to the priority of service requirement. However, individualized career services and training services are subject to the requirement. Priority of service status is established at the time of eligibility determination and does not change during the period of participation. Priority does not apply to the dislocated worker population. Veterans and eligible spouses continue to receive priority of service among all eligible individuals; however, they must meet the WIOA adult program eligibility criteria and other applicable criteria under WIOA.

Priority must be provided in the following order:

1. Veterans and eligible spouses who are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient;
2. Individuals who are the recipient of public assistance, other low-income individuals, or individuals who are basic skills deficient;
3. Veterans and eligible spouses who are not included in WIOA's priority groups;
4. Other individuals not included in WIOA's priority groups. Individuals included in this group are older worker (55 and older), former foster youth, individuals with disabilities, school dropouts, and offenders who are not economically disadvantaged (i.e., not recipients of public assistance or not low-income individuals).
5. Underemployed workers who do not fall under numbers 1 to 4 and are in need of WIOA individualized services. Individuals who are underemployed may include, but are not limited to:
 - a. Individuals whose family income does not exceed the self-sufficiency guidelines.

- b. Individuals employed less than full-time who are seeking full-time employment;
- c. Individuals who are employed in a position that is inadequate with respect to their skills and training;
- d. Individuals who are employed who meet the definition of a low-income individual described in WIOA;
- e. Individuals who are employed, but their current job earnings are not sufficient compared to their previous earnings from their previous employment.

Basic skills deficient status is determined at time of eligibility as stated above. An individual who is basic skills deficient 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. Criteria used to determine whether an individual is basic skills deficient includes the following:

- Lacks a high school diploma or high school equivalency and is not enrolled in postsecondary education.
- Enrolled in a Title II Adult Education/Literacy program.
- English, reading, writing, or computing skills at an 8.9 or below grade level.
- Determined to be Limited English Skills deficient through staff-documented observations.

Services and Activities Available under WIOA Title I Youth Program

Imperial County WDB provides a broad array of workforce development and training services to youth and young adults, ages 16 to 24. Services are delivered under a contract with the Imperial Valley Regional Occupational Program (IVROP).

Imperial County WDB's Youth Committee is responsible for planning and other issues relating to the provision of workforce services to youth. In addition, the committee is responsible for the oversight of the WIOA Youth Program. Goals of the committee include increasing awareness of the importance of youth issues; leveraging funds for youth programs; and motivating communities to improve the quality and effectiveness of youth services.

WIOA Youth Programs and Services

IVROP's Project Connect annually serves more than 250 of Imperial County's WIOA-eligible youth between 14 and 24 years of age. The year-round program serves both in- and out-of-school youth and focuses on educational attainment, career planning, job readiness, and development of leadership skills. Participants also receive intensive guidance and counseling and may receive supportive services to enable their participation in the program. Project Connect provides all 14 mandatory WIOA Youth Program elements including the following:

1. Tutoring, study skills training and instruction leading to secondary school completion or attainment of an equivalency credential
2. Alternative education
3. Paid work experience
4. Occupational skills training
5. Education offered concurrently with workforce preparation
6. Leadership development opportunities
7. Supportive services
8. Adult mentoring
9. Follow-up services
10. Comprehensive guidance and counseling
11. Financial literacy education
12. Entrepreneurial skills training
13. Services that provide labor market information
14. Postsecondary preparation and transition activities

Youth participate in work-based learning and work toward attainment of industry-recognized degrees or certificates. They also increase their literacy and numeracy skills, and improve their long-term labor market skills. Interested youth and young adults may apply for the program at IVROP or through any of the WDB's AJCCs.

Services to Increase the Digital Skills of Youth

Digital literacy and fluency have been critical needs for WIOA youth participants during the COVID-19 pandemic. During workshops and tutoring activities, staff delivers lessons in effective methods for using video conference technology. This includes assisting participants with navigating technology devices and software, such as computers and smartphone devices; the Zoom videoconferencing platform; Google Meet and Google docs; Microsoft office; and email. Staff also assists and guides participants through the process of downloading digital apps to use for program activities. Staff provides participants with video tutorials and resources to expand their digital literacy and fluency skills.

This year, IVROP Project Connect has put participants' digital skills to work through English and math skills tutoring utilizing digital platforms. Additionally, the program has provided educational workshops (financial literacy, labor market information, developmental assets, thrive leadership, and work readiness) by utilizing digital platforms.

Services for Youth with Disabilities

Project Connect participants with disabilities who require accommodations are provided supportive services and linkages to resources that will support their successful completion of the program. For example, if a youth participant requires an English or Spanish sign language interpreter, IVROP will hire or recruit a volunteer to provide interpreter services to assist the participant with program activities (e.g., educational workshops, community service, tutoring, work experience). If specialized equipment is required for a participant

with disabilities, the program will utilize WIOA funds to purchase specialized equipment. Project Connect abides by all equal opportunity program requirements.

Entity Responsible for Disbursal of Grant Funds and the Competitive Process Used to Award Contracts for WIOA Title I Activities
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Imperial County WDB has documented policies and procedures in place for disbursement of grant funds and competitive award of sub-grants and contracts.

Disbursement of Grant Funds

The entity responsible for the disbursement of WIOA grant funds is the Imperial County Board of Supervisors (ICBOS) through administration of the Imperial County Workforce and Economic Development Office (ICWEDO), which house the Workforce Development Board staff. The ICWEDO Director is authorized to review and approve payment transactions. Imperial County WDB administers WIOA grant funds within the local workforce development area in compliance with the requirements of the statute and applicable federal regulations and state requirements.

Award of Sub-Grants and Contracts

The WDB uses a competitive process for the award of all sub-grants and contracts for employment and training services. The process adheres to the procurement requirements specified in the OMB Circulars, Code of Federal Regulations (CFR) policies and procedures, EDD Procurement Directives, and the Procurement Policy developed by the WDB. Under the approved process, an RFP document is approved by the ICWDB's Executive Committee and recommended to the full board. The document is then forwarded for formal approval to the Board of Supervisors. Once approved, a public notice advertising the RFP is posted in various newspapers and periodicals in Imperial, Riverside, and San Diego counties for a minimum of 30 days. Generally, at least six weeks is provided for the receipt of proposals. Typically, two workshops are held to provide technical assistance and guidance to eligible applicants. To ensure transparency, all questions that arise as a result of these sessions are documented in a "question and answer" format and are posted on the WDB's website. After the submission deadline closes, proposals are reviewed by the Fiscal and Program Compliance Departments to ensure that all mandated documentation has been submitted. ICWDB's administrative analysts ensure compliance with RFP instructions. Proposals are scored by a review panel, which consists of individuals from public and private organizations, who have subject matter expertise. Each reviewer is provided a Request for Proposal Evaluator Guide and Scoring Rubric document before the formal reading and scoring of proposals occurs. Final scores are tallied and the highest scoring proposal is recommended to the WDB Executive Committee and the full board for funding. After WDB approval, a formal recommendation for funding is presented to the Board of Supervisors by the Director.

The two main procurements conducted by the Imperial County WDB are Adult Training Services and Youth Services. Contracts awarded for Adult Training services are for a

period of one year. Contract awards for Youth services are generally for a period of two years. All contracts are eligible for a one-year extension contingent on available funding and the successful completion of established performance outcomes. AJCC/One-Stop Operator services are also competitively procured.

How the Local Board Fulfills the Duties of the AJCC Operator and/or the Career Services Provider or Selection of AJCC Operators and Career Services Providers
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The responsibilities of the AJCC/One-Stop Operator (OSO) are met by a competitively procured contractor, while Imperial County WDB fulfills the role of the career services provider for the Title I WIOA Adult and Dislocated Worker programs.

AJCC/One-Stop Operator

The Imperial County WDB has competitively procured and selected ProPath, Inc. as the OSO. ProPath, Inc. has nearly forty years managing and operating workforce development programs and functions as the OSO for several of California's local workforce development areas. The role of the AJCC Operator is to:

- Coordinate the service delivery of required AJCC partners and service providers;
- Ensure the implementation of partner responsibilities and contributions agreed upon in the MOU;
- Provide reports regarding operations, performance, and continuous improvement recommendations;
- Assist with the implementation of policies established by the WDB; and
- Adhere to all applicable federal and state guidance.

Career Services Provider

With state approval, the Imperial County WDB directly provides career services for the WIOA Title I Adult and Dislocated Worker programs. The WDB has functioned in this capacity for more than twenty years throughout the operation of local workforce programs under the Workforce Innovation Act and, subsequently, WIOA. The WDB recently submitted an application to the California Workforce Development Board requesting approval to continue to operate as the career service provider. The application highlights unique experience and qualifications of the WDB, including staff skills and abilities; resources as a county agency; and a broad spectrum of partnerships that include dozens of public, private and non-profit organizations throughout Imperial County.

V. CONSIDERATIONS FOR PROGRAM YEARS 2021 - 2024
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Based on discussions held throughout the planning process, the following topics have been identified as priorities for further exploration, development, and/or enhancement as the Imperial County WDB and the partners implement the Local Plan.

Major themes, as discussed in the Introduction to this Plan, are those with a broad scope. The WDB and stakeholders identified the following major themes in connection with the implementation of this plan:

- Develop and offer training for emerging industries, including manufacturing, information and communications technology, and logistics and transportation.
- Identify strategies to increase digital access and equity for thousands of County residents who lack hardware, internet access, and technology skills
- Support consolidated planning in an effort to increase economic and workforce opportunities throughout Imperial County
- Identify opportunities for increased resource sharing and reduction in duplication of effort among workforce system partners and stakeholders.

Other workforce strategies and issues that stakeholders have suggested the WDB and partners examine and evaluate include the following:

- Develop strategies that directly target the needs of small businesses. These should address support for hiring, onboarding, and training of new staff, along with the upskilling needs of current employees.
- Consider the likelihood that the global adoption of work-at-home strategies may create opportunities for Imperial County residents to secure employment with companies based in the Bay Area, on the east coast, or across the Pacific. Given the types of jobs most likely to create these opportunities for local workers, developing a plan to train job seekers in skills that would make them desirable candidates for these positions is a top priority.
- Expand the availability of “soft skills” training for workers and develop a unified strategy for teaching job applicants how to market their “work appropriate” attitudes and behaviors to businesses seeking qualified candidates for employment.
- Examine the various efforts being used throughout the valley to market employment, hiring and skills development-related services to businesses. Consider opportunities to connect these efforts and possibilities to share in customer outreach.

- Through joint efforts of workforce system partners and community stakeholders, identify realistic and achievable approaches to increase engagement with underserved and vulnerable populations.
- Examine various alternative approaches to English language skills instruction, such as contextualizing instruction within vocational training programs and offering employment-focused, stackable training.
- Create a plan for maintaining current virtual service strategies and offering them in tandem with traditional in-person services as part of a sustained hybrid service delivery system.
- Working with system partners and community stakeholders, develop a comprehensive online directory of services that would address the information needs of providers, businesses and job seekers throughout the county

VI.	APPENDICES
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The following Items are included as part of the Local Plan.

Attachment 1: Stakeholder and Community Engagement Summary

Attachment 2: Public Comments Received that Disagree with the Local Plan

Attachment 3: Signature Page

ATTACHMENT A
Stakeholder and Community Engagement Summary

The Imperial County Workforce Development Board held two zoom meetings to engage stakeholders. The meetings were held by zoom to enable stakeholder engagement while ensuring maximum safety during the COVID-19 pandemic. The email list was derived from those regional partners from the Region meeting list and additional local partners and stakeholders. Outreach for Imperial County was by email and some local stakeholders were contacted by telephone. There were two zoom meetings held to ensure maximum safety during the pandemic. They were held on February 3 and 17, 2021.

Mode of Outreach	Target of Outreach	Summary of Attendance	Comments
Email/phone	All present and past partners and interested stakeholders	77 attendees for 2 meetings CBO, education and government , were represented	- Meetings were well attended and participants were engaged

**ATTACHMENT B
PUBLIC COMMENTS RECEIVED THAT DISAGREE WITH
THE LOCAL PLAN**

There were no comments received during the period of public comment from March 26, 2021-April 25, 2021 for Imperial County.

SIGNATURE PAGE

The following signatures represent approval of the Local Plan by Imperial County Workforce Development Board and the Chief Elected Official for the Imperial County Local Workforce Area.

For the Imperial County Workforce Development Board:

	4/22/2021
Karina Alvarez, Chair	Date

For the Imperial County Workforce Development Area:

Michael W. Kelley, Chair	Date