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The Governor's Coordination and Special Services Plan for Maine's Job Training System, 1994

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Bureau of Employment and Training Programs

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PY '94 - '95

The Governor's Coordination and Special Services Plan

for

Maine's Job Training System

L12/2.10:
GO 573/94-95

c.1

(Revised for the Maine Human Resource Development Council)

TABLE OF CONTENTS

SECTION I - IDENTIFYING INFORMATION.....	1
SECTION II - PROGRAM PLANNING INFORMATION.....	1
I. Introduction.....	1
A. Purpose of the (GCSSP).....	1
B. Economic Environment for Job Training Policy.....	1
II. Goals and Objectives.....	12
A. State Goals for the JTS.....	12
GOAL A. Serve More of the Eligible Population.....	12
GOAL B. Ensure a More Effective System.....	15
GOAL C. Increase Wage Parity Between Sexes.....	16
B. U.S. DOL Program Goals.....	18
1. Customer Focus.....	19
2. Expanding Customer Options.....	19
3. Quality Outcomes.....	20
4. System Capacity and Responsiveness.....	20
III. Standards for PIC Program Oversight.....	20
A. Annual Planning Instructions to SDAs.....	20
B. Monitoring/oversight policies, systems, and procedures.....	20
C. General Procedures.....	20
IV. Coordination of JTPA with Other Agencies.....	21
A. MHRDC Plan Development and Oversight.....	21
B. Intra-agency Coordination.....	23
C. Model Projects.....	24
1. The Business Visitation Program (BVP).....	24
2. The Essential Work Competencies Project.....	25
3. TRC's and Dep't of Transportation NTO orientation.....	25

SECTION III - APPENDIX	1
I. State Method for Allocating JTPA Program Funds.....	1
A. Title II-A 77% Adult Program.....	1
B. Title II-A 5% Older Worker Grant.....	1
C. Title II-B Summer Youth Employment and Training Program.....	2
D. Title II-C Economically Disadvantaged Youth Program.....	2
E. 8% Education Grant.....	2
F. Other Title II setasides.....	2
G. Title III.....	3
H. State Job Training Programs.....	3
1. The Maine Training Initiative (MTI) Program.....	3
2. The Strategic Training for Accelerated Reemployment (STAR) Program.....	3
II. Program Activities.....	3
A. Program Evaluation.....	3
B. Projected Use of Resources	7
1. Administrative System for Monitoring and Oversight.....	7
2. Auditing, Monitoring, and Oversight Responsibilities	10
3. Title II-A, B, and C Training Activities.....	11
a. Intake Activities.....	12
b. Objective Assessment	12
c. The Individual Service Strategy	12
d. Support Services	13
e. Employability Competency Training	13
f. Educational Skills Training	14
g. General Educational Development.....	14
h. Entry Employment Experience	14
i. Work Experience	15
k. Customized Occupational Training	15
l. General Occupational Training	15
m. Academic Enrichment.....	16
n. Additional Barriers Selected by SDAs	16
4. Older Worker Program Activities	17
5. Use of 8% Education Grant Funds.....	18
6. Capacity Building and Technical Assistance.....	20
III. Performance Standards.....	25
A. Adjustments to Standards	25
B. Failure to Meet Performance Standards	26
C. Failure to Meet Performance Standards for Two Consecutive Years.....	26
IV. Procurement Procedures.....	26
V. Compliance with Non-Discrimination Provisions	27
VI. Governor's Signature.....	28

SECTION I - IDENTIFYING INFORMATION

Governor's Coordination and Special Services Plan

State of Maine

for the period

Program Years 1994 and 1995

Grantee for JTPA funds:

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Date of submission: June 23, 1994

SECTION II - PROGRAM PLANNING INFORMATION

I. Introduction

A. Purpose of the Governor's Coordination and Special Services Plan (GCSSP).

The Job Training Partnership Act (JTPA) requires the Governor to prepare a statement of goals and objectives for job training and placement programs within the State. The purposes of the Governor's Coordination and Special Services Plan (GCSSP) are to:

- provide direction for the activities of State and local agencies;
- to assist in the preparation of the Service Delivery Area plans; and
- provide for the coordination of programs for maximum efficiency and effectiveness.

The State policy described here provides a framework within which local Private Industry Councils (PICs) can establish more specific goals for their Service Delivery Areas (SDAs). The PICs' goals, which must support the State goals, are presented in the SDA plans.

The GCSSP begins the planning process by presenting State goals and allocations of resources to be further refined by the PICs. The planning loop from goal statement to activity planning to implementation to evaluation is closed with the State's review and approval of SDA plans. The plans are then used as the basis for tracking, monitoring, performance review and, if necessary, corrective action.

B. Economic Environment for Job Training Policy.

This section will describe the character of Maine's labor market. It will indicate that fundamental transformations have occurred in the Maine employment environment which drive the employment and training policy expressed in this document.

Three primary changes have affected the employment environment for eligible populations since the boom period of the late 1980s: the dramatic rise in dislocation and unemployment, the diversity of skills and experience of dislocated and otherwise unemployed persons, and the onset of long-term stagnation in demand for labor.

Growth in the numbers of unemployed

Maine's civilian labor force grew rapidly in the sixties, seventies, and especially the eighties for three reasons. The working age population as a result of the post-war "baby boom" grew rapidly; there was a large net immigration of population; and women became more active in the labor force. These labor force dynamics occurred in an environment of strong labor demand, as the Maine economy experienced a surge in defense, construction and overall employment. The result was a low unemployment rate and an environment conducive to high placement rates for both disadvantaged and dislocated workers.

By 1989, the factors driving Maine's strong labor demand had run their course. Defense downsizing, an oversupply in residential and commercial property and a protracted national recession led to a rapid rise in dislocation and overall unemployment between 1989 and 1994. During this period Maine lost about 6% of its employment base. Consequently, with the already increased size of the labor force, the number of unemployed has nearly tripled.

Along with the increase in the number of unemployed, there has been an increase in the number of individuals initially filing unemployment insurance (UI) claims and the number of people actually receiving UI benefits (as indicated by continued claims) over the last five years. A rapid rise in these indicators points to the degree of structural unemployment occurring in Maine. Not only are more people receiving UI, but they stay on UI longer and more of them exhaust their benefits. This points to the difficulty people are having finding reemployment in this economy. The chart below compares these indicators in the month of January 1989 and 1990 to 1993 and 1994.

	Jan 1989	Jan 1990	Jan 1993	Jan 1994
Initial Claims	3,859	4,438	4,271	4,498
Continued Claims (Less Partials)	11,205	16,743	17,410	17,709
Average Duration in Weeks	10.6	11.1	16.5	14.6
UI Exhaustees	531	957	1,715	1,421

Of the individuals in the pool of UI exhaustees, shown above for a one month period, a few will find employment, while the remaining will continue to look for employment or drop out of the labor force.

Federal Program Changes

While much more severe in Maine, these trends were felt in the national economy, as well. During much of the 1980's the needs of economically disadvantaged workers were given greatest attention. By 1988, Congress began to recognize the growing number of dislocated workers in addition to growing difficulties of first-time job seekers. The federal response has driven two major changes in Maine's Job Training System (JTS) approach. One change increased the number of people eligible for services, primarily adults, and the other change increased the number of youth targeted for services.

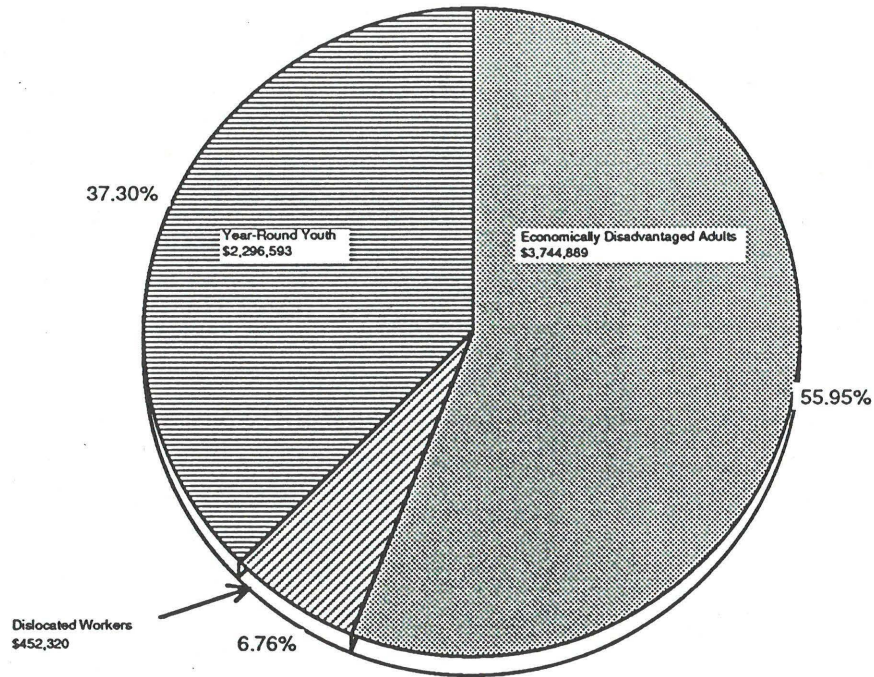
The first change came with the Economic Dislocation and Worker Adjustment Assistance (EDWAA) Act of 1988. In the mid-1980s, the largest share of the job training budget was used for the economically disadvantaged program. Before the new dislocated worker program took effect, less than 5% of JTPA funds were available to serve dislocated workers in Maine. In PY '94, nearly a third of JTPA funds (not counting grants received for special projects to serve this population) are available to serve dislocated workers. To help meet this growing need, total JTPA program funds (exclusive of special grants) have doubled to \$12.8 million for PY 1994 from only \$6.5 million in PY 1988.

The EDWAA Act also provided broad criteria for participation in the dislocated worker program. An out-of-work airline pilot is as eligible as a laid-off textile worker. This broad eligibility criterion has brought increased numbers eligible for services into the Maine JTS. Because of the breadth and depth of recent industry dislocations, the JTS is faced with a growing clientele with a much broader range of skills and needs than it had traditionally experienced.

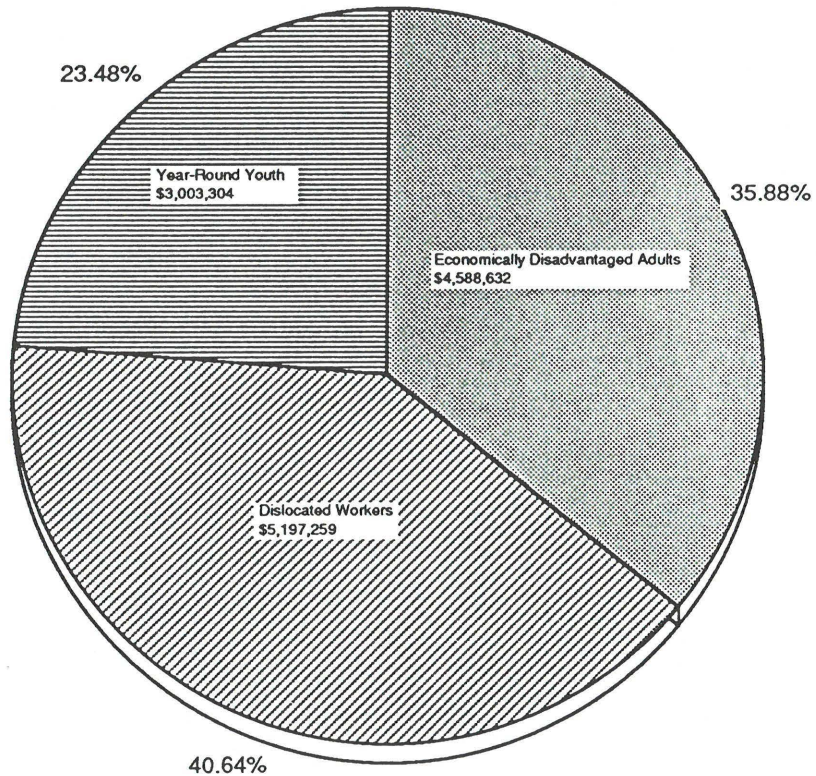
The charts below show how federal legislation has restructured the targeting of funds. Funds shown for youth are for the year-round program. If funds for the summer youth program were included, programs for the economically disadvantaged adult, economically disadvantaged youth, and dislocated worker would each receive about a third of the funds.

PY 1988 Federal Program Funds

Total \$6,493,802

**PY 1994 Federal Program Allocations**

Total \$12,789,195

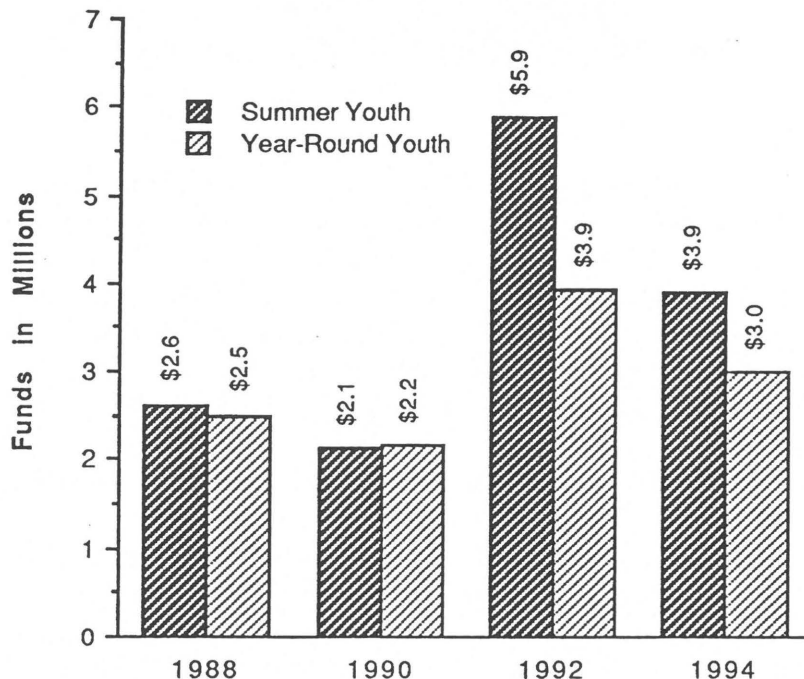


The second major change in program purpose is the emphasis on school-to-work transition services for youth. The year-round youth program formerly was an adjunct of the economically disadvantaged adult program and emphasized job search assistance and specific occupational skills to enter employment. The Job Training Reform Amendments of 1992 created a separate year-round program which addresses basic skill deficiencies in order to provide youth with the skills and aspirations to either pursue further education and training or enter employment.

The goals of another youth program which operates during the summer months are to expose youth to the workplace and to enhance their work-related educational skills. Most of the youth enrolled in the summer program and half of the youth enrolled in the year-round program are enrolled in school and, thereby, are not in the labor force.

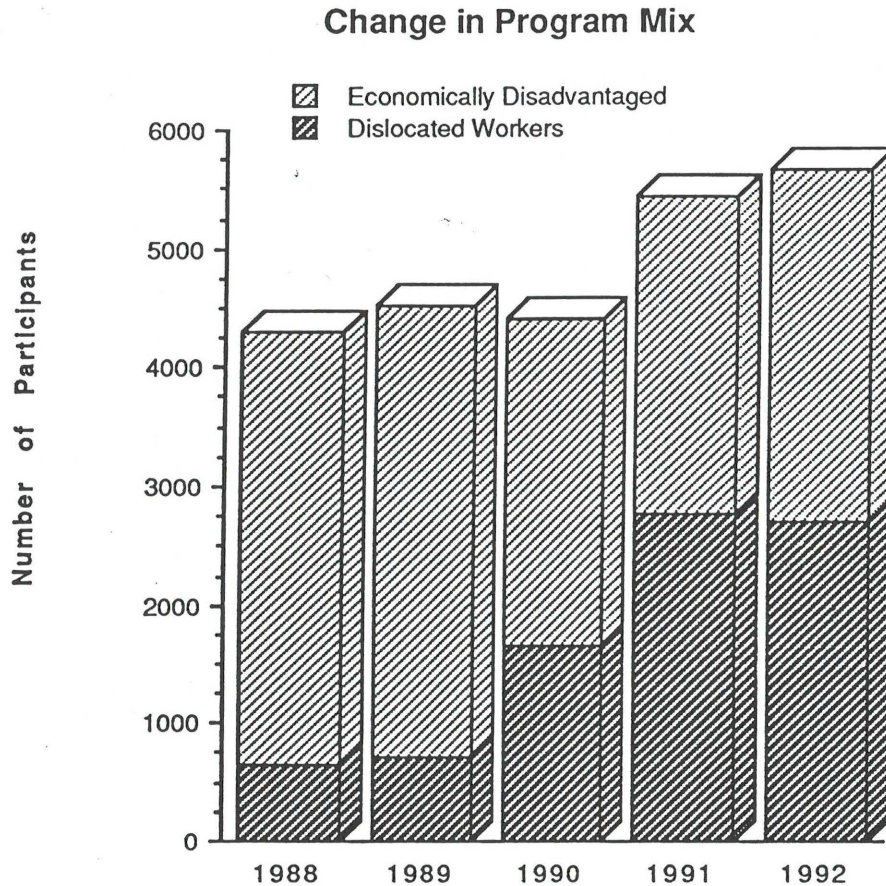
Even though the proportion of total federal funds allocated to youth programs in 1994 is less than in 1988, the level is above 1988. The federal emphasis on school-to-work transition has been accompanied by more funds, especially for the summer youth program, as demonstrated in the chart below. The combination of program emphasis on school-to-work transition and increased funding has allowed more youth to be served.

**Youth Program Funds
1988 to 1994**



Widening of client diversity

Corresponding to the shift in funds has been a shift in the number and type of clients served by the JTS.

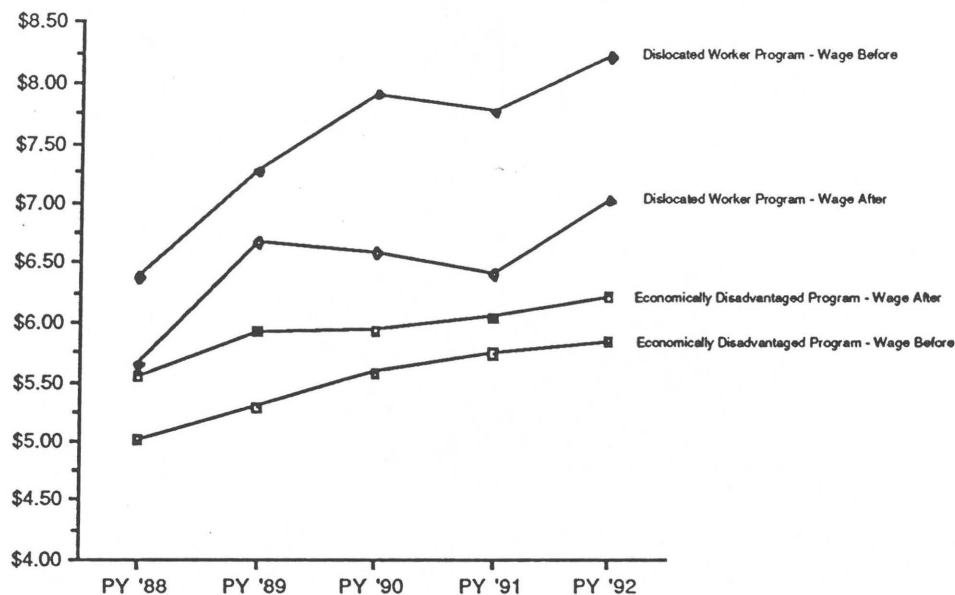


Dislocated workers were only 15% of total participants served in PY '88. In PY '92, dislocated workers were 48% of total participants served. As explained above, the broad eligibility criterion for the dislocated worker program and widespread economic dislocation has brought in clients with a wider range of needs. Consequently, the characteristics of dislocated workers who have participated are markedly different from the economically disadvantaged clients traditionally served by the JTS.

For example, those enrolled in the dislocated worker program bring a higher level of education to the program than participants in the economically disadvantaged program. In addition, while the average wage of dislocated workers before enrollment is higher than the economically disadvantaged (\$2.37 higher in PY '92), wage at placement is generally significantly lower than when they entered. Wage at placement

for those completing the economically disadvantaged program is generally higher than before they entered the program.

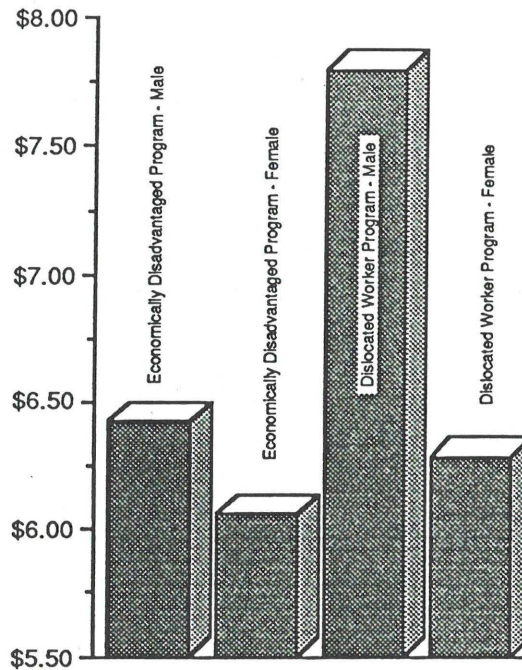
**Comparison of Title II-A and Title III Programs
Wages Earned Before Enrollment and Wage at Placement**



At the same time, the average wage at placement for those leaving the dislocated worker program has been higher than participants in the economically disadvantaged programs. The statewide average wage at placement for the dislocated worker program was \$7.69 during the period of July 1, 1993 to December 30, 1993 compared to \$6.64 in the economically disadvantaged program.

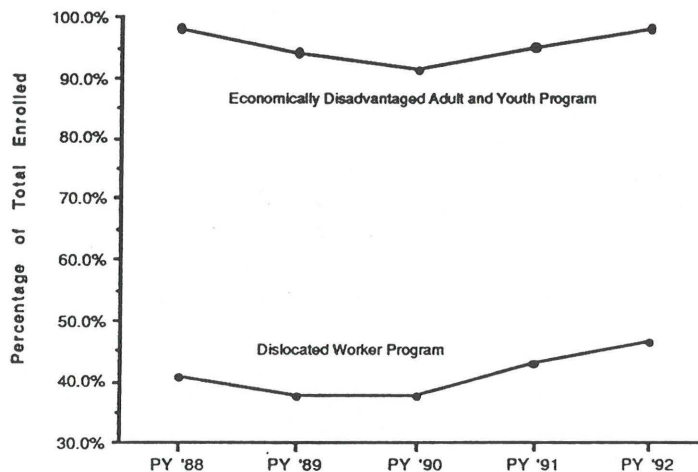
However, data show a marked disparity in the wages of men and women in all programs, especially the dislocated worker program. In fact, wage at placement for women participants in the dislocated worker program is virtually identical to that of women in the economically disadvantaged program, and below men in the economically disadvantaged program.

PY '92 Average Wage at Placement



The chart below shows that there are markedly fewer economically disadvantaged enrollees in the dislocated worker program. This is not surprising since many have just been laid off from jobs. However, the fact that about 40% of the dislocated workers are economically disadvantaged highlights the difficulty they are having finding jobs after they have been laid off for a lengthy period. This suggests that the sooner dislocated workers obtain services, the greater the chances of avoiding poverty status.

Percentage of Economically Disadvantaged Individuals of Total Enrollees



Increase in Unmet Need

The table below shows the number of participants served in two program years by category of need as measured by the economically disadvantaged program. Corresponding to the number actually served is an estimate of the "universe of need" as indicated by the 1990 U.S. Census Bureau. There are 128,000, or more than one in eight Mainers aged 14 or older, who live in households with incomes 70% or less than the Lower Living Standard Income Level. In PY '92, the Maine JTS served 2.3% of them. These figures indicate that despite a doubling of financial resources, the system is unable to meet much of the need,

Title II-A Economically Disadvantaged Program

	Individuals Served		Population Estimate	Average Eligible % Served
	PY '91	PY '92		
Total Participants	2,660	2,953		
Economically Disadvantaged	2,528	2,893	128,000	2.1%
Unemployed	1,686	1,876	8,000	22.3%
H.S. Dropout	362	394	38,000	0.1%
AFDC	789	903	24,233	3.5%
AFDC/JOBS Participants	530	629	14,131	4.1%
Food Stamp Recipients	1,242	1,496	141,717	0.1%
Limiting Disability	549	582	7,800	7.3%

Further, the increased number of business dislocations is producing a pool of eligible dislocated workers that far exceed the possibility of serving them within existing program design and resources. SDAs commonly must close enrollments three or four months into the program year due to budget constraints. Of course, not all workers who are laid off seek assistance. However, based on experience, nearly a third of those dislocated will seek assistance. Due to the overwhelming number of dislocations occurring, Maine has applied for and received five federal grants for additional financial assistance since 1989, totalling over \$4 million.

The chart below compares the numbers served to the eligible population of UI recipients. If one third of the eligible population were interested in obtaining services (as has been the experience of service providers), then the system did not serve 25,000 potential customers in PY '92.

Title III Dislocated Worker Program

	Total Individuals Served*		UI Recipients (Continued Claims)		Percent of UI Recipients Served		Individuals Dislocated Due to Layoffs **		Percent Dislocated Served	
	PY '91	PY '92	PY '91	PY '92	PY '91	PY '92	PY '91	PY '92	PY '91	PY '92
Participants	2,770	2,714	65,876	83,170	4.2%	3.3%	17,119	17,000	16.2%	16.0%

* Includes those funded with annually allotted funds, as well as those funded by special grants.

** This data collected by the Maine DOL is the number of individuals dislocated in layoffs of 20 or more people within 3 weeks for at least 30 days.

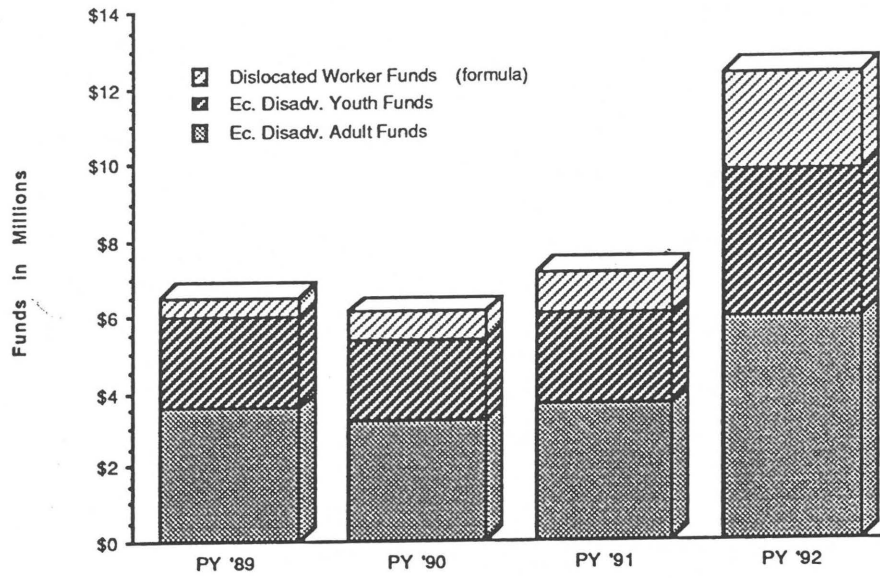
Of the number of UI recipients, some were dislocated in a "mass layoff." These are typically the people that the "rapid response" teams address on the business site. Even if a third of them were interested in services, the capacity of the system was inadequate to meet the need.

Fewer Participants Served with Greater Financial Resources

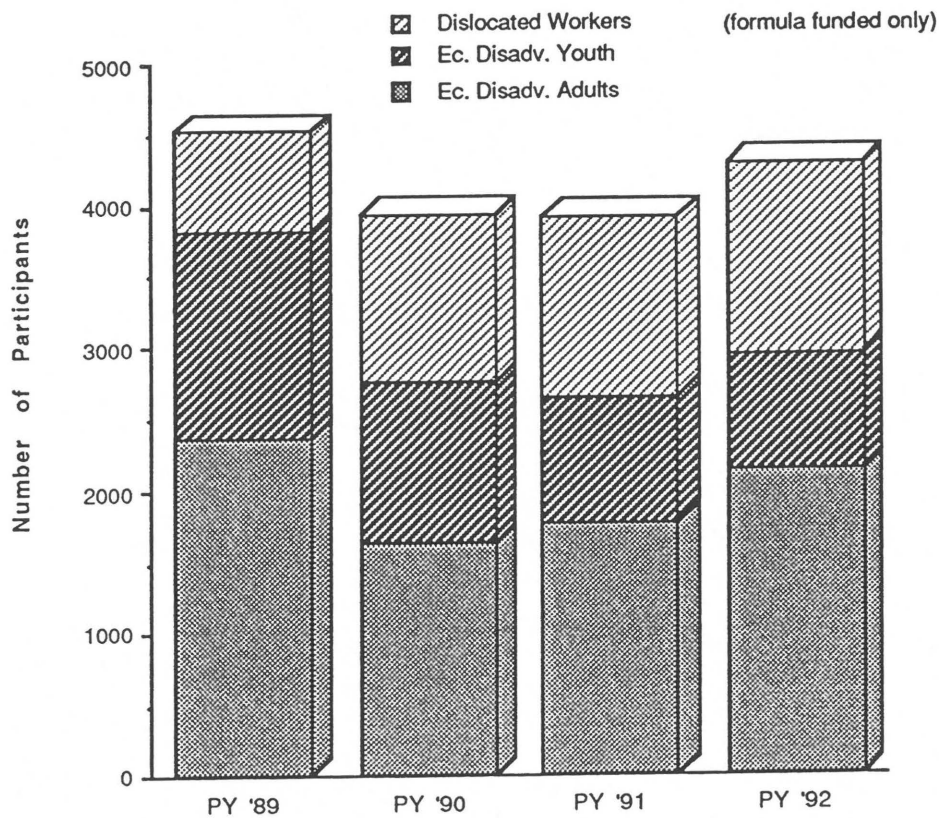
While the flood of the newly eligible would be expected to place a burden on the system, experience indicates that increased resources were not accompanied by an increase in the number of clients served. A comparison of participation and program funding indicates that even while program funding doubled, the number of participants has remained essentially unchanged (actually declined since PY 1989). Thus, despite the dramatic rise in demand for job training assistance and a doubling of financial resources, the JTS has been unable to increase the numbers of clients it serves.

The charts below show the change in funds and the change in numbers of participants in Maine's three largest programs, excluding the summer youth program. A comparison of the two charts shows that while total funds have increased the total number of participants served has not. Funds for each individual program have increased. Number of youth served has decreased while the number of dislocated worker has increased, although not commensurate to the increase in dislocated worker funds.

**Annual Change in Funds
for
Economically Disadvantaged Adults, Youth, and Dislocated Workers**



Annual Change in Participant Numbers



Conclusion

The employment environment that drove system design during the 1970's and 1980's has changed dramatically. In Maine and other New England states this change has fallen upon the labor force with a vengeance. While Congress has substantially increased the amount of resources available in Maine to aid dislocated and economically disadvantaged workers, the Maine JTS has been unable to increase its capacity to serve the rising flood of workers.

The barriers to expanding system capacity certainly include federal restrictions that hamper efforts at creative system design. Nonetheless, Maine workers face high unemployment and the likelihood that job growth will not accelerate any time soon. This is the environment within which Maine employment and training professionals, working with policy advisors such as the MHRDC, undertake a broad policy review and debate with the hope that the planning process and dialogue enhances the Maine Job Training System's ability to respond in a timely and effective manner to the numerous challenges it faces.

II. Goals and Objectives

A. State Goals for the JTS

The following State goals apply specifically to each program in the Maine Job Training System (JTS) and the JTS as a whole. These goals may be required, as appropriate, to be reflected in the Service Delivery Area program plans. Specific instructions designed to lead to the fulfillment of these goals are contained in the PY '94 JTS Core Program Planning Instructions.

GOAL A.

SERVE MORE OF THE ELIGIBLE POPULATION MORE EFFECTIVELY.

Recognizing the increased and changing demand on the existing system, Maine JTS seeks to improve both access to and quality of services.

Strategy 1. Develop a quantifiable goal for PY '95 to increase the proportion of eligible clients served as a percentage of the total population.

As outlined in the section "Economic Environment for Job Training Policy", above, there are many more individuals eligible for services than the system is able to serve. However, with the federal policy shift toward "universal access," the Maine JTS needs to address the issue of serving more people in a variety of ways. PY '94 will be an

experimental year for the SDAs. In their PY '94 plans, they have proposed a number of approaches to increase the numbers served and increase the diversity of services to those clients. The SDAs will provide the BETP with a summary report on the results of these approaches and efforts to increase the diversity of services

During the course of PY '94, through the review of new program design efforts and using, if available, the preliminary results of the pilot project and through the development of a dynamic definition of unmet need, the BETP and the SDAs will develop a quantitative goal for PY '95 to increase the total number of individuals served, as that population relates to the total population of unmet need.

Strategy 2. Implementation of Comprehensive Information Management System (CIMS).

The State's new Comprehensive Information Management System (CIMS) is being designed to reduce paperwork for case managers and to free BETP staff to focus on program quality.

BETP will continue the implementation of the CIMS, which will automate and electronically link the JTS delivery system among its various offices, as well as link it to other significant employment and training resources in Maine.

By January 1995, the BETP anticipates that all 18 program offices in the 12 County SDA and the Cumberland County SDA will be "on-line." In addition, several of these offices will also have the Job Service "touch screen terminals" in place, allowing a JTPA office to directly refer clients to Job Service employment opportunities. The BETP will informally survey the program offices after they have been on-line and for one year and six months to assess 1) whether CIMS actually reduced paperwork and, therefore, increased direct client service time, and 2) whether the guides and resources on the CIMS have increased the flow of Labor Market Information (LMI) to clients.

The BETP will also work with the Penobscot Consortium SDA to link their case management system with CIMS. This linkage will occur on two levels: first, the BETP and the Penobscot Consortium SDA will work to eliminate, if possible, double data entry, and second, the BETP will work with the Penobscot Consortium SDA to ensure them access to the "library" type resources available on CIMS, such as the Job Developers Guide and NTO tracking.

Strategy 3. Provide resources for front line staff development in order to meet the needs of an increasing and widely diverse customer base.

For programming beginning in '94, the BETP has instituted a Capacity Building Workgroup consisting of the BETP's Director for Administration and one representative from each of the three SDAs. The purposes of the workgroup will be to provide policy recommendations regarding the use of the State's 1/3 share of the JTPA Incentive Grant, and to coordinate the SDAs' use of their 2/3 share with overall State expenditure plans to maximize investments and reduce duplication of effort.

The BETP expects to be able to use a portion of its PY '94 funds for staff development and training. The Capacity Building Workgroup will establish priorities among the following: continuing the turn-around-training initiative started by the NETEC Compact Assessment Training, implementing CIMS, identifying training needs around the statewide goals of implementing the pilot project, capacity building, and nontraditional occupations training and job placement, as well as developing training plans based on the national objectives contained in TEGL 3-93 and TEIN 27-93.

The following questions will be asked to help determine funding decisions regarding staff development and training:

Will it contribute to attaining the strategic goals and objectives of the U.S. and Maine Departments of Labor?

Will the training contribute to satisfying a need previously identified from monitoring, surveys, management reviews and audits?

Will the training have the support of immediate supervisors?

Will the training be congruent with an organization's incentive and performance appraisal system?

To what extent will training be competency based?

To what extent will the skills learned at training be implemented on the job?

How will the skills learned be measured on the job?

How will the training contribute to increasing quality services, customer satisfaction, and program integrity?

GOAL B.

ASSESS THE EXISTING JOB TRAINING SYSTEM IN ORDER TO ENSURE A MORE EFFECTIVE SYSTEM FOR DELIVERING EMPLOYMENT AND TRAINING SERVICES.

The findings in Section B. - "Economic Environment for Job Training Policy" indicate that the JTS must adopt new approaches to service delivery to successfully meet the demands of a changing workplace and workforce. The Maine JTS will employ three strategies to develop a more effective delivery system: a pilot project; an assessment of the effectiveness of the current system to assist clients, especially dislocated workers; and incentives for program innovations.

Strategy 1. Pilot Project.

The Maine JTS proposes to approach system issues through a pilot project. This pilot project will be developed in conjunction with Maine Human Resource Development Council (MHRDC) members through a series of workgroups. The workgroups will have three tasks: program design, bid selection, and implementation oversight. The project may be funded either of two ways: the Bureau of Employment and Training Programs (BETP) may underwrite the costs of this project or a grant for essentially the same purpose may be secured from the U.S. DOL

If the first funding alternative is taken, a portion of the State share of Title III (EDWAA) funds will be used to support the project. This is because the intended outcomes of this pilot project pertain to dislocated workers as well as clients funded by Title II. However, this may entail seeking waivers from the U.S. DOL of current limitations on expenditures, such as cost category restrictions (except those for administration), cost allocations, and procurement restrictions regarding infrastructure.

The U.S. DOL has announced a national competition for "one-stop career centers." Since this is the direction that the pilot project intends to move the Maine JTS, Maine will submit a grant application. The BETP will continue to pursue parallel tracks: applying for the U.S. DOL grant and working with the MHRDC Pilot Committee on the pilot project design.

The pilot project will be operated during PY '94 and into PY '95. The results of the project will be incorporated, as appropriate, in the delivery structure.

Strategy 2. Assessment of Dislocated Worker Assistance.

In PY '94, the MHRDC proposes to undertake a carefully constructed, but preliminary, assessment of the effectiveness of the JTS to assist dislocated workers over the period 1991 to 1994. The State Planning Office and the BETP will conduct an analysis that will compare placement outcomes for dislocated workers who have received services and those that have not. This study will offer insights into overall Title III program effectiveness and will be incorporated, as appropriate, into State planning instructions to SDAs for their PY '95 plans.

Strategy 3. Encourage the planning and implementation of innovative program designs.

The BETP will provide incentives for the development of exemplary programs. Part of the BETP's Incentive Grant, which is a setaside of JTPA funds, will be targeted to model out-of-school youth programs design proposals from the three SDAs. Criteria for funding these proposals will be developed by the BETP in the first quarter of PY '94 and will be submitted to the MHRDC for review.

GOAL C.

INCREASE THE PARITY BETWEEN MEN'S AND WOMEN'S WAGES AT EXIT FROM THE JOB TRAINING SYSTEM.

The United States Congress and the Maine Legislature has found that women participating in JTPA programs tend to be enrolled in programs for traditionally female occupations and that many JTPA programs which have low female enrollment levels are in fields of work that are nontraditional for women. Moreover, wage at placement for female participants in Maine dislocated worker programs is 22% below that of male participants. In fact, female participants in Maine dislocated worker programs are placed at wages below male participants in the economically disadvantaged program.

Because the long-term economic security of women is enhanced by increasing their employment opportunities in jobs not traditionally held by women, the BETP established an employment placement rate goal for women of 10% in PY '93. The BETP will sustain the employment placement goal for women of 10% in PY '94. The BETP seeks to increase this target level to 12% in PY '95.

Strategy 1. Increase the employment placement rate of women in nontraditional occupations (NTOs) from 10% in PY '94 to 12% in PY '95.

Continue to provide support through the NTO Workgroup, an improved tracking system for NTO placement data and provision of program models.

The BETP has initiated and maintained an NTO Workgroup to develop strategies and seek additional funding for this effort; implemented an improved tracking system for NTO placement data, and plans to identify resources and models for staff.

Strategy 2. Require full integration of NTO into SDA services.

SDAs are directed to integrate NTO into all relevant aspects of their client processes (career exploration, work experience, OJT and classroom training selection and options available, and actual employment opportunities).

Strategy 3. Implement a Demonstration Project with TRC and the MEDOT.

The BETP staff is working on a demonstration project with the Maine Department of Transportation (DOT) and the Cumberland County SDA's Training Resource Center. The DOT is underwriting the costs of a demonstration project to develop an NTO orientation module for all women participants who apply to TRC for services.

TRC will develop an extended career exploration session (approximately 40 hours) for those women choosing to pursue NTOs further following the orientation. This project is anticipated to begin in September 1994 and will extend through September 1995. The materials, workshop modules and other relevant resources, experiences, and results will be shared with the other two SDAs in the state.

Strategy 4. Utilize Carl Perkins funding for NTO Initiatives.

The State's Carl Perkins Plan has emphasized NTO as a funding activity in the past, as it will in PY '94 and '95. These resources are available to the JTPA system on a competitive basis. Currently, several program offices have Carl Perkins funds to develop NTO initiatives.

Strategy 5. Investigate additional strategies to improve wage at placement levels for women exiting the job training system.

The BETP, in conjunction with SDAs, will continue to identify barriers to higher wages at placement and to identify resources and strategies to address these barriers.

B. U.S. DOL Program Goals

In the planning instructions for the PY '94 and PY '95 GCSSP issued by the U.S. Department of Labor, new policy directions were emphasized. These included four goals for the Title II Economically Disadvantaged Program: 1) customer focus, 2) customer options, 3) quality outcomes, and 4) system capacity and responsiveness. The U.S. DOL planning instructions for the Title III EDWAA Plan also included these goals and others.

While the goals are excellent, the timing for implementing these goals was problematic, being communicated only five months prior to the start of a new program year. In order to develop quantitative and qualitative objectives for these goals, the BETP proposes instituting BETP/SDA work groups that will develop the measurable objectives for these goals over the course of PY '94 in order to implement these goals in PY '95.

Whenever possible, the workgroups' priority is to address those goals that are relevant to both the Title II and Title III programs. The BETP's priorities are: customer focus, customer options, system responsiveness, and quality outcomes.

1. Customer Focus

The BETP, in conjunction with the three SDAs, will look at several customer focus issues. These include, but are not limited to:

- designing customer (participant, applicant, and employer) survey instruments with elements common to all SDAs;
- implementing customer feedback forums or sessions;
- developing a report format that the SDAs would use to provide the findings of these surveys and forums to the BETP biannually (one planning cycle); and
- integrating these findings into new program design initiatives, as appropriate.

2. Expanding Customer Options

The BETP, in conjunction with the three SDAs, will look at several customer options issues. These include, but are not limited to:

- analyzing the depth and range of services provided "in-house" by the SDAs to customers (primarily participants, but potentially employers as well);
- analyzing the depth and range of services provided by the SDAs through brokering; e.g., Adult Education classes, Technical College and University classes, and supportive services such as housing, substance abuse counseling;
- analyzing the access customers (participants, applicants, and employers) have to SDA and in-house brokered services; and
- developing strategies based on these analyses to increase and/or improve those options for clients. An example is the Business Visitation Program which surveys businesses on a local level to identify potential job openings, as well as business training needs. Another example is the development of customized training for employers.

3. Quality Outcomes

Quality issues are not stand-alone issues. Therefore, as the BETP and the SDAs develop survey and feedback instruments, quality indicators will be included. When the BETP and SDAs conduct an analysis of customer access to services and the depth and range of those services, quality indicators will be included.

4. System Capacity and Responsiveness

System capacity and responsiveness issues are being addressed through the creation of the workgroups mentioned above, through the implementation of the pilot project, and through the capacity building initiatives, such as the CIMS. While these initiatives do not and cannot address all the issues facing the system, changing the system's capacity to be responsive to customer needs is an on-going process. The MHRDC's participation in the development of this document has provided the context and goals for continuously reviewing the system's performance and responsiveness.

III. Standards for PIC Program Oversight

The BETP has established the following general standards for Private Industry Council program monitoring/oversight activities:

- A. The BETP shall communicate general oversight standards to the PICs through its annual planning instructions to SDAs.
- B. The BETP requires the PICs to describe their monitoring/oversight policies, systems, and procedures. The BETP does not specify detailed oversight instructions but reviews PICs to ensure that their policies and procedures have been implemented.
- C. The following general procedures shall be required of all PIC oversight procedures:
 1. PICs must publish their oversight policies and procedures in their Administration Manuals if they have one or in their Job Training Plan if they do not;
 2. PICs must prepare a monitoring schedule;
 3. PICs must differentiate between "desk-top" and "on-site" oversight activities;

4. PICs must establish standards for oversight, such as "plan vs actual" comparisons;
5. Oversight activities must result in a report being prepared;
6. Corrective action must be defined when findings so indicate; and
7. A method for follow-up must be established to ensure that corrective action steps have occurred.

IV. Coordination of JTPA with State and Local Education Agencies, the Maine Job Service, Economic Development, and Other Agencies.

The general mechanism for coordinating organizations focusing on employment and training and human resource utilization is developed and carried out by three interlocking processes. The highest level of coordination occurs with the State Job Training Coordinating Council, whose responsibilities in Maine are subsumed under the Maine Human Resource Development Council. The next level of coordination occurs with the PICs. The final coordination process rests with the JTS service deliverers, which in Maine are the same deliverers as those for all State and JTPA job training programs.

A. MHRDC Plan Development and Oversight

Pursuant to the requirements of JTPA §122(b), the MHRDC reviews JTS Plans (including this document), the Maine Job Service Plan, the Job Opportunities and Basic Skills Program (JOBS) Plan, the Carl Perkins Plan, and the Adult Basic Education Plan. A committee of the MHRDC will review and comment on each plan and present its comments to the full council. Other members of the MHRDC and the public are welcome to attend and participate in plan review meetings. The intent is to create a circumstance that allows as much participation in plan review as is desired by each MHRDC member.

In PY '94 and '95, the MHRDC has decided to focus its efforts for this GCSSP on the policy issues related to increasing the ability of the system to serve more eligible clients more effectively. As a part of that overall initiative, the MHRDC and the BETP have prepared coordination criteria around the one stop shop career center initiative for the four agencies and the three SDAs whose plans are reviewed by the MHRDC.

The MHRDC plan review process consists of evaluating these plans using the State goals and the coordination criteria described in this GCSSP. The MHRDC, which had not met for 18 months, convened on February 3, 1994 and established three state-level goals (see Section II.A.1.) Only the first

goal, which focuses on the "one-stop career center" approach, will be used for evaluating the four agency plans.

There are two coordination criteria established by the MHRDC, which the Planning and Coordination Committee members will use to review the four agencies' and three SDA plans:

- What activities, approaches, policies has your organization put in place, if any, to move in the direction of a "one-stop career center?"
- What barriers (institutional definitions and design, funding limitations, etc.) has the agency encountered in its attempts to move in the direction of a "one-stop career center."

To assist the agencies in responding to the two coordination criteria outlined above, the MHRDC developed the following working definition for a "one-stop career center."

A "one-stop career center" is an approach to comprehensive education, training and employment services. When applicants/clients come to one organization, they receive services directly from that organization and/or are connected to other relevant services. The connection can occur:

- through the physical co-location of relevant service organizations;
- by electronic linkages between organizations for expeditiously sharing relevant client information (thereby reducing redundant processes for the applicant/client); and
- by linking the applicant/client to other relevant services."

The MHRDC emphasized the following design elements in a discussion on "one stop shop."

- Universal access - Is your organization moving in the direction of "universal access" or are the services limited to a specific population?
- Services linkage - Do your clients access a common core of services?
- Customer focus - Is your program designed to respond to the "customer"?

- Organizational linkage - What other organizations are critical for your clients' success in the education, training and employment environment?

B. Intra-agency Coordination

The BETP has three approaches to coordination with specific agencies within the Department of Labor as well as with outside agencies: The first approach is the plan review process, outlined above, which considers the degree to which agency plans and SDA plans support the MHRDC goal of "one-stop career centers." This is the fundamental coordination goal and effort for PY '94 and '95. The second approach focuses on electronic linkages between programs and systems (as described below). The third approach emphasizes model projects that can be analyzed and replicated (as described below).

1. Electronic Linkages

The electronic linkages initiative has been underway since fall 1992. BETP has created the Comprehensive Information Management System (CIMS), which has three goals: to provide an automated case management system to all SDA administrative and program offices by 1995; to link that case management system to other relevant DOL resources; and, to link that case management system to relevant outside agencies.

The first process has developed a client-driven system for JTPA data, including but not limited to: client biographical information; first enrollment in JTPA; work history (including occupational titles and DOT codes if available); test scores (e. g. TABE and APTICOM); occupational goals and objectives; occupational training alternatives; component enrollments; receipt of employability enhancement certifications; unsubsidized job placements (including employer, occupation, and wages); jurisdiction of enrollment; and, job training counselor and phone number. In addition, the system tracks expenditures by participant (including but not limited to tuition, fees, and supportive services). The case management system is fully operational in one program office with plans to be in place in three more program offices and one SDA administrative office by July 1994. All offices will be "on-line" by 1995.

The second process links Job Service (JS), Unemployment Insurance (UI) and the Division of Economic Analysis and Research (DEA&R) with the Maine Job Training System. Examples of that linkage process are:

- Job Service data: JS registration status; office where registered; JS contact person; work history (including occupational titles and DOT codes if available); recent referral information (including employer, occupation and results); and TAA enrollments. In addition, Job Service has agreed to locate JS "touch screen job banks" in JTPA program offices.
- Unemployment Insurance data: current claimant status (including eligibility and benefits); start date of benefits and expected end dates; layoff dates, occupations and wages; durations of employment by employer; mass layoff status; current employer information (including occupation and wages); registration office; and contact person.
- Division of Economic Analysis and Research data: general Labor Market Information (LMI); Job Developer Guide; Occupational Profile data; 1990 Census data; job search capacity based on client's vocational aptitudes and abilities; and training institutions data.

The third process is linkage to external agencies serving mutual clients. The major focus for this third component is linkage with the Job Opportunities and Basic Skills (JOBS) program. BETP's linkage process between the JTPA and JOBS programs has started in one SDA, the Training Resource Center, which serves Cumberland County. Because these two systems do not share the same administrative entity (JTPA falls under DOL and JOBS under DHS), the electronic exchange of information on clients presupposes the following: hard copy signed releases; individual access code which defines access parameters; electronic record of request for information transmittal which shows date of transmittal; name of individual making information request and nature of transmittal. Access has been defined as "input and viewing access" or "viewing access only". This third process has just begun and will continue to be developed and refined throughout PY '94 and '95.

C. Model Projects

The BETP has implemented a number of pilot and model projects to move coordination efforts ahead. Examples of three projects of this nature are outlined below:

1. The Business Visitation Program (BVP) is a layoff prevention initiative, designed to link the employment and training community more closely to economic development entities and the business community in Maine. The BETP has funded the Maine Department

of Economic and Community Development and the Maine Job Service to implement a business survey and response program in six communities throughout the state. This design surveys businesses, through local Chamber of Commerce volunteers, in order to access their production capacity, production limitations, training needs and issues and general concerns about local, regional and state regulatory issues. The project started in one community in PY '92, has been expanded to six communities in PY '93, and will continue to expand in PY '94 and PY '95.

2. The Essential Work Competencies Project is developing the theoretical framework and competency assessment modules to assist JTPA clients in the attainment of the competencies necessary to succeed in a high performance work place. The project, which is overseen by a technical workgroup with representatives from the three SDAs and BETP, started in PY '93 and will continue into PY '94. As a part of its development work, the project has provided two training sessions for Maine Job Training System staff.
3. As referenced in Goal C in the "State Goals for the JTS" section above, BETP is working with the Maine Department of Transportation and the Training Resource Center to develop a demonstration project to create an NTO orientation module for all women participants who apply to TRC for services. In addition, TRC will work with Women Unlimited (an NTO training organization) to develop a "hands-on" extended career exploration session (approximately 40 hours) combining "hands-on" job shadowing in NTO experiences with NTO guest speakers; and, assessment of relevant math, reading, and computer learning skills. This project is anticipated to begin in June 1994 and will extend through June 1995. The materials, workshop modules and other relevant resources, experiences and results will be shared with the other two SDAs in the state.

In addition, the State's Carl Perkins Plan has emphasized NTO as a funding activity in the past, as it will in PY '94 and '95. These resources are available to the JTPA system on a competitive basis. Currently, several program offices have Carl Perkins funds to develop NTO initiatives.

APPENDIX

I. State Method for Allocating JTPA Program Funds

PY '94 allocation data, calculations, resulting percentages for each of Maine's three SDAs, and dollar amounts based on annual federal allotments are shown in a separate publication Job Training Program Allocations to SDAs issued on February 25, 1994. Below is the methodology used for distributing funds:

A. Title II-A 77% Economically Disadvantaged Adult Program

The BETP has allocated JTPA Title II-A 77% funds to SDAs according to the following formula required by JTPA §202(a)(2) and (b)(1) and (2):

- One third of 77 percent of the State Title II-A allotment is allocated to SDAs based on the relative number of unemployed individuals residing in areas of substantial unemployment in each SDA as compared to the total number of such unemployed individuals in the State.
- One third of 77 percent of the State Title II-A allotment is allocated to SDAs based on the relative excess number of unemployed individuals who reside in each SDA as compared to the total excess number of unemployed individuals in the State.
- One third of 77 percent of the State Title II-A allotment is allocated to SDAs based on the relative number of economically disadvantaged adults within each SDA compared to the total number of economically disadvantaged adults in the State.

Data for the first two requirements were produced by the DOL's Division of Economic Analysis and Research. Data for the third element was produced by the Employment and Training Administration from the 1990 census.

B. Title II-A 5% Older Worker Grant

The BETP has distributed JTPA 5% Older Workers Grant funds according to the Older Americans Act (Title §506(c)). The data for this formula is derived using the Maine Bureau of Elder and Adult Services Intrastate Funding Formula which allocates 50% of the funds according to the percentage of all people 60 years of age and older. The remaining 50% of the funds are allocated based equally on the percentage of the minority population 60 years and older, the population in social need 60 years and older, and the population in economic need 60 years and older in each

county. SDAs will not receive less than a minimum allocation of 10% of the grant.

Administrative allowances are 20 percent of the total grant, of which the State receives 5 percent and the SDAs receive 15 percent allocated by the Intrastate Funding Formula. The remaining 80 percent is distributed to SDAs according to the Intrastate Funding Formula. No SDA has received less than 10 percent of the total grant.

C. Title II-B Summer Youth Employment and Training Program

The JTPA Title II-B Grant is allocated according to the same formula used for Title II-C 82% allocations (JTPA §262(b) (1)).

D. Title II-C Economically Disadvantaged Youth Program

The BETP has allocated JTPA Title II-C 82% funds to SDAs according to the following formula required by JTPA §262(a)(2) and (b)(1) and (2):

- One third of 82 percent of the State Title II-C allotment is allocated to SDAs based on the relative number of unemployed individuals residing in areas of substantial unemployment in each SDA as compared to the total number of such unemployed individuals in the State.
- One third of 82 percent of the State Title II-C allotment is allocated to SDAs based on the relative excess number of unemployed individuals who reside in each SDA as compared to the total excess number of unemployed individuals in the State.
- One third of 82 percent of the State Title II-C allotment is allocated to SDAs based on the relative number of economically disadvantaged youth within each SDA compared to the total number of economically disadvantaged youth in the State.

E. 8% Education Grant

For PY '94, the 8% Grants from the Title II-A and II-C Programs are combined and 80% is targeted to the Jobs for Maine's Graduates (JMG) Program through a collaborative agreement between the Department of Education and Department of Labor. The remaining 20% is held by the BETP to fund the Maine Youth Apprenticeship Program (MYAP) and to support the MHRDC's activities.

F. Other Title II setasides

Use of Title II-A and II-C 5% Administration Funds is described elsewhere in this section. Calculation of the 5% Incentive Grant is described in Section III.B.6.d.

G. Title III

The method for allocating Title III (EDWAA) funds is described in the *PY '94 - '95 State EDWAA Plan*.

H. State Job Training Programs

1. The Maine Training Initiative (MTI) Program

Of the amount of funds appropriated by the Maine Legislature for the MTI Program, 5% is reserved for State functions and the remainder is allocated to SDAs by the Department of Labor formula as required by 26 MRSA §2011.

The distribution of 62 percent of the funds is based on the actual distribution of JTPA Title II-A funds. The remaining 38 percent of the funds is distributed based on the relative distribution of the population that is within 150 percent of the OMB poverty level according to the 1990 Census.

2. The Strategic Training for Accelerated Reemployment (STAR) Program

Of the amount of funds appropriated by the Maine Legislature for the STAR Program, 12% is reserved for State functions and 5% is set aside for later distribution. The remainder is allocated to SDAs by the Department of Labor formula.

Fifty percent of STAR funds is distributed is based on the county distribution of the unemployed during PY '92 and fifty percent is distributed based on the unemployment rate for each county during PY '92.

II. Program Activities

A. Program Evaluation

1. Statewide PY '91 and PY '92 Performance

The following charts show characteristics of statewide performance at the end of PY '91 and PY '92 in the Title II-A and II-B programs, the Title III program, and the State-funded MTI and STAR programs.

PY '91 Title II-A Program Statewide Outcomes

	Planned	Actual	Δ%
Total Enrollments	2,762	2,778	1%
Terminations	1,328	1,231	-7%
Entered Employment	884	801	-9%
Females	1,519	1,713	13%
Persons with Disabilities	552	571	3%
School Dropouts	331	381	15%
AFDC Recipients	691	812	18%
AFDC/JOBS Participants	414	484	17%
Older Workers	83	286	245%

Title II-B SYETP Program 1992 Statewide Outcomes

	Planned	Actual	Δ%
Total Enrollments	3,234	3,306	2%
Work Experience	2,860	3,000	5%
Employment Competency Training	2,254	1,665	-26%
Basic/Remedial Education	926	1,020	10%
Try Out Employment	350	366	5%

PY '91 Title III EDWAA Formula Program Statewide Outcomes

	Planned	Actual	Δ%
Enrollments	1,010	1,255	24%
Terminations	557	614	10%
Entered Employment	440	467	6%
Wage at Placement	\$6.61	\$6.39	-3%

PY '91
MTI Program Statewide Outcomes

	Planned	Actual	Δ%
Total Enrollments	1,046	1,116	7%
Terminations	550	540	-2%
Entered Employment	380	342	-10%
Wage at Placement	\$6.33	\$7.17	13%

PY '91
STAR Program Statewide Outcomes

	Planned	Actual	Δ%
Total Enrollments	1,096	1,125	3%
Terminations	574	598	4%
Entered Employment	441	434	-2%
Wage at Placement	\$6.29	\$6.81	8%

PY '92
Title II-A (78%) Program Statewide Outcomes

	Planned	Actual	Δ%
Total Enrollments	3,444	3,574	4%
Terminations	1,659	1,892	14%
Entered Employment	1,179	1,200	2%
Females	2,043	2,275	11%
Persons with Disabilities	598	712	19%
School Dropouts	452	504	12%
AFDC Recipients	891	1,041	17%
AFDC/JOBS Participants	596	712	19%
Adult Wage at Placement	\$6.09	\$6.47	6%

1993
Title II-B SYETP Program
Statewide Outcomes

	Planned	Actual	Δ%
Total Enrollments	2,227	2,521	13%
Work Experience	2,000	2,271	14%
Employment Competency Training	1,323	1,382	4%
Basic/Remedial Education	824	1,006	22%
Try Out Employment	230	257	12%

PY '92
Title III EDWAA Formula Program
Statewide Outcomes

	Planned	Actual	Δ%
Enrollments	1,282	1,351	5%
Terminations	689	647	-6%
Entered Employment	557	493	-11%
Wage at Placement	\$6.76	\$7.01	4%

PY '92
MTI Program Statewide Outcomes

	Planned	Actual	Δ%
Total Enrollments	622	811	30%
Terminations	386	449	16%
Entered Employment	264	315	19%
Wage at Placement	\$6.37	\$6.66	5%

PY '92
STAR Program Statewide Outcomes

	Planned	Actual	Δ%
Total Enrollments	925	1,163	26%
Terminations	516	555	8%
Entered Employment	397	419	6%
Wage at Placement	\$6.43	\$7.01	9%

2. Quarterly Performance Review Procedures

Quarterly reviews have two purposes: to indicate compliance with the law and to measure variance from State and SDA goals. An example of a compliance indicator is the actual percentage of economically disadvantaged participants enrolled compared to the 90% required by the JTPA. An example of a variance measure is the actual percentage of women placed in NTOs compared to the State goal of 10%.

SDAs initiate the action necessary to complete specified performance reports at the end of each quarter. Performance standards worksheets and report forms are issued to SDAs. These are the action steps taken by SDAs and the BETP to produce final performance reviews for each quarter:

- a. Within 15 calendar days of the end of each quarter, the BETP will submit to SDAs statewide actual performance on each of the performance measures.
- b. Within 20 calendar days of the end of each quarter, SDAs will submit to the BETP completed performance standards worksheets and performance reports (attached) using MIS data. Included with the data submission, SDAs will submit a written report which addresses any performance which lies above or below 15% of the standard or goal. In these cases, the report must include three elements: 1) a statement of the problem caused by the variance, 2) a solution or approach to solving the problem, and 3) a timeframe or deadline for correcting the problem.
- c. Within 10 calendar days of the submission of SDA quarterly reports, if further explanation or action is needed based on its review of the SDA quarterly reports, the BETP will schedule a meeting with the SDA to discuss corrective action requirements.

In the past, Corrective Action for underperformance has been required before the end of the program year in a few cases. It has not been necessary to invoke Corrective Action for underexpenditure.

B. Projected Use of Resources

1. The State's Administrative System for Monitoring and Oversight

Maine's JTPA administrative entity is the Bureau of Employment and Training Programs (BETP) which is organized within the Maine Department of Labor. Being a small state with limited alternative resources, Maine is heavily dependent on the JTPA 5% administration setaside to successfully fulfill its policy guidance and management oversight mandates. The BETP's effectiveness is being significantly challenged because of a smaller 5% grant compared to previous years. Maine has suffered a 23% reduction in the administration grant over the past two years. The administration grant in PY '92 was \$490,500 and is \$379,500 in PY '94, a loss of \$111,000. Such a reduction cannot do other than constrain the BETP's ability to accomplish its goals and objectives.

In the face of diminishing resources, the BETP asks two critical questions: "Why are we doing this?" and "Why are we doing it this way?" The process for answering these questions helps identify basic assumptions about what's being done, allows a judgment of its value, and contributes to new and more effective ways of doing business.

Described below are several steps the BETP has taken to reduce administrative burdens while at the same time contributing to quality program oversight.

- The State's new automated MIS, called the Comprehensive Information Management System (CIMS), in addition to eliminating paperwork for case managers, contains its own edits. The current MIS system is maintained at the State level and includes monitoring for data errors and inconsistencies, all of which, when detected, has to be communicated to the field and follow-up procedures instituted. All this is being eliminated, freeing BETP staff to focus more on the qualitative aspects of its management and oversight responsibilities.
- The BETP is developing its own integrated database so that staff will have immediate and equal real-time access to all information. Much time is wasted by staff asking each other for information when the technology exists for getting it directly.
- The monitoring process is being reengineered to focus on developing program and professional relationships, and to integrate findings into the capacity building process. The BETP has goals beyond strict compliance which include developing productive State/SDA relations, sharing program information, and identifying potential areas for staff development and training.
- The BETP's contracting procedures have been integrated into the planning and management oversight loop. Previously, contracts were reviewed independently of planning instructions and program management. Now, in addition to being reviewed for compliance with administrative issues, they are evaluated in light of past program performance, new goals and objectives based on planning instructions, and results of prior monitoring and evaluation efforts.

Additionally, the BETP has collapsed the number of necessary contracts for passing money to SDAs. The old process included 976 pages of contract documents. The BETP previously had a contract document for each title and setaside. This resulted in tremendous amounts of wasted paper, to say nothing of the time and energy it took to track and maintain them. Now, all SDA pass-through funds are contracted by one major document.

The process for conducting SDA quarterly evaluations and for developing corrective action plans has been totally revamped. Instead

of SDA performance being analyzed at the State level, to which SDAs responded, the SDAs are now conducting their own analysis and informing the BETP of their corrective action plans, as necessary. The corrective action plans may be negotiated in meetings between SDA and BETP staff. This part of the process builds effective and productive relationships by contributing to successful outcomes.

The actions listed above, and the ones the BETP will adopt and implement in the future, contribute significantly to successful statewide program management and oversight. However, no amount of restructuring and reengineering can compensate for inadequate financial resources. The \$111,000 loss the BETP has sustained in reduced funding will force the Bureau to reduce its total priorities and lessen the amount of effort that is put into each endeavor.

A primary administrative tool of the BETP which has not changed is its planning instructions issued to SDAs annually. Besides the major policy initiatives as sanctioned by the MHRDC, the document contains requirements for SDAs to explain how they will operate their programs to meet the needs of their local populations. The BETP requires the SDAs to interpret the need for job training services through the characteristics of the local labor force and economy, and requires plans for evaluating the effectiveness of their services. Finally, SDAs are required to provide narratives regarding all activities consistent with JTPA §104(b), and to submit program planning and budget information summaries.

The responses submitted by the SDAs are thoroughly reviewed by the program and administrative staff of the BETP for compliance and conformity with the instructions contained in the planning document.

All areas of noncompliance and areas of dispute are negotiated with each SDA. The completed document serves as the authorizing narrative for the contract document.

The contract document is another major component of the BETP's administrative system. Once executed, it allows SDAs to draw down money and expend funds for employment and training programs. In addition to the standard boiler-plate language, the contract contains specified expectations concerning participant enrollments and separations, and planned expenditures according to cost categories.

The contract document requires SDAs to comply with the BETP's administrative manual containing all Financial Management System (FMS) and Management Information System (MIS) rules and

procedures to ensure program integrity. The manual contains specific policies, guidelines and rules regarding the participant and fiscal management reporting systems that are more detailed than the planning instructions and contracting language. In conjunction with the contract document, this manual is probably the most critical resource the BETP has to fulfill the state's role under the Act. The SDAs are held fully accountable for the policies and procedural requirements contained in the manual.

2. Auditing, Monitoring, and Oversight Responsibilities

Monitoring is conducted by the administrative, program/planning, and workforce development units of the BETP. Monitoring consists of desk reviews of quarterly performance (described in Section III.A.2.) and on-site visitation for fiscal audits and qualitative program evaluation. The purpose of monitoring is threefold:

- to ensure State and legislative compliance of programs under State jurisdiction;
- to increase the BETP's exposure to SDAs and local service providers, recognizing shared responsibility for the delivery of quality programs; and
- to use monitoring information and process to develop short and long-term program adjustments and strategies to serve the people of Maine in the best way possible.

On-site evaluation is the responsibility of three monitoring teams, each team comprised of representatives from the three BETP units and assigned to one of the three SDAs, respectively. This approach embraces the majority of BETP staff, providing exposure and crosstraining in all areas of program operations and customer service. Monitoring efforts will focus on the changes created by the 1992 JTPA amendments, including administrative procedures, program design, and program operations.

In addition, the MHRDC reviews policies for consistency with JTPA and state-funded programs. As well as state and federal legislation and regulation, the policies adopted and approved by the MHRDC form the BETP's authority to provide policy guidance and management oversight to the SDAs throughout the program year. The MHRDC holds the BETP accountable for SDA compliance with all federal and State laws and regulations governing programs.

The MHRDC also has a role in the oversight of JTPA funded programs through the plan review process. The MHRDC receives an annual report describing the operation of all programs funded by JTPA. The MHRDC is provided with a presentation by BETP staff and given an opportunity to question and comment on JTPA performance.

The BETP documents that SDAs are operating programs in compliance with the planning instructions and the federal and State rules and regulations through auditing and monitoring functions. Audits are conducted in compliance with the Unified Audit Standards. Two SDAs, as private non-profit entities, receive auditing services through RFPs, while the State Audit Department conducts these reviews for the BETP and the third SDA. Audit reports of the private non-profit SDAs are reviewed by the BETP to ensure compliance with federal circulars.

Other avenues exist to build effective communication systems between the BETP and among the three SDAs. One example is the BETP's bimonthly SDA Directors' meetings. These are held to provide effective feedback regarding the policy guidance and management oversight activities. Mutual areas of concern are discussed, and issues related to the qualitative aspects of the program and other problems are identified and resolved. Another example is the utilization of task-specific work groups to address issues of common interest and concern. Currently, the BETP has organized task groups to develop a statewide NTO policy and to develop a statewide automated case management system.

Finally, an integral part of the BETP's administrative system is complying with the reporting requirements of the state legislature. The Maine Department of Labor is responsible for reporting all its activities to the Joint Standing Committee on Appropriations and Financial Affairs, the Joint Standing Committee on Labor, and the Joint Standing Committee for Audit and Program Review. These Committees are keenly interested in how the State's general funds are integrated with federal monies and the results of our program expenditures.

3. Title II-A, B, and C Training Activities.

The BETP issues planning instructions to SDAs which require them to describe the types of activities and services available to participants. The activities below are summarized from the "master plan" of SDA job training plans. Because activities in all JTPA titles are delivered by the same service providers, the common features of the titles and

their setasides are described in a master plan and any unique elements are described in a plan written for a particular JTPA title. The activities listed below are common to JTPA Titles II-A, II-B, II-C, and Title III. Not all activities may be used in all programs. For example, General Educational Development, On-the-Job Training, and Customized Occupational Training, are not used in the Title II-B program.

- a. Intake Activities consist of orientation to available services, eligibility determination, selection of the most-in-need, and pre-enrollment assessment.
- b. Objective Assessment is a client-centered examination of participant capabilities, vocational potential, basic skills, obstacles and supportive service needs, and is used to develop an individualized service strategy for each participant.

Through a variety of assessment and measurement procedures and instruments, as appropriate for each participant, information is gathered, goals established, and the training methodology agreed upon by participant and staff is documented through development of an Individualized Service Strategy (ISS). This action plan is updated and modified as needed throughout participant enrollment in the JTS.

Methods and instruments may include the Tests of Adult Basic Education (TABE), APTICOM, Pre-Employment/Work Maturity Competency System, Harrington-O'Shea, General Aptitude Test Battery, Comprehensive Adult Student Assessment System, interest inventories, work history reviews, life skills assessments, labor market information and other activities and assessment tools completed alone, in groups, or one-to-one with JTS staff.

- c. The Individual Service Strategy (ISS) is written following Objective Assessment. If at this time the participant decides not to continue with job training, or to defer participation until a later time, he is referred to outside agencies for other assistance as appropriate and an ISS is not written. With the rest of the participants, an Individual Service Strategy is developed between each and JTS staff, based on information determined during Objective Assessment. The plan includes an employment goal, objectives, the appropriate combination of activities and services, including support services, necessary to achieve the goal, and timeframes around each.

The ISS documents the decisions made by participant and staff about the mix of services and activities, including referrals to other community programs for services unavailable in the JTS.

- d. Support Services are initiated as needed to enable participation in the program, based on needs identified during assessment. Services may be provided by other community resources or with JTS program funds. Support services may include needs-based payments, payments for dependent care, transportation, clothing and the like, counseling, and, for youth, incentives or bonuses.

Training Activities are built around the participant's occupational development needs, requirements for self-sufficiency, labor market trends, and training capacities in the community and job training system. Many participants take part in preparatory training, designed to remediate or enhance basic work skills and attitudes. If a participant's occupational skills are inadequate or are at odds with what is in demand in the labor market, enrollment in On-the-Job Training or classroom training is made to address the occupational deficits. Intensity in participation is encouraged if it is identified in the ISS as appropriate. Training activities include the following:

- e. Employability Competency Training is training in pre-employment/work maturity skills aimed primarily at teaching and validating specific proficiencies in life/work management, career decision making, citizenship skills, job search skills and work maturity. Learning objectives, competency indicators, pre and post-assessment tools, curricula and documentation and certification procedures are delineated in a Pre-Employment/Work Maturity Competency Handbook written by the SDAs.

This component consists of structured activities designed to assess the individual's relative proficiency in each of the competency areas and then to prescribe and provide instruction in competencies which need to be addressed.

Many of the competencies and curriculum materials in Pre-Employment/Work Maturity are also used to facilitate the adult participant's initial entry into the workforce.

Progress towards achievement of proficiency is continually monitored and when all of the desired proficiencies are achieved, a PIC-approved certificate is awarded to youth and may be awarded to an adult participant as appropriate.

Career decision making is a major portion of Employability Competency Training. Effort is made to widen participant options through information on a variety of occupational choices, including a thorough evaluation of training and employment in nontraditional or alternative occupations.

- f. Educational Skills Training is training in academic and learning skills. It is directed toward correcting deficiencies in language and computational skills, and providing needed credentials that are recognized by employers and the educational community. Training is offered in group or tutorial settings. The types of general instruction include:
 - Remedial Education addresses general deficiencies in math and language skills. It is used to refresh an individual's academic skills for later enrollment in basic education competencies or General Educational Development (G.E.D.) training, and to address the needs of those for whom English is an second language or those with literacy deficiency.
 - Basic Education is training in educational skills to achieve specific levels of competence. It is based on standards of performance defined in part by employers as a general prerequisite to entry-level jobs. Achievement of those standards will result in the award of a PIC-approved Basic Education Skills credential. Procedures for documentation and certification of this competency are delineated in the SDA's Pre-Employment/Work Maturity Competency Handbook.
- g. General Educational Development (GED) is education skills training aimed specifically at attainment of a GED credential awarded by the Maine Department of Education.
- h. Entry Employment Experience is training for youth in work maturity through limited internships in the private-for-profit sector, with participant wages provided by JTS program funds. The limited internships will not exceed 500 hours per participant per enrollment in JTS, and are designed to enhance the long-term employability of youth by providing on-site private sector exposure to work and the requirements for successful job retention. Limited internships may be combined with classroom instruction relating to a particular job, and/or instruction on work maturity and life skills.

- i. Work Experience is training in work maturity skills at public or private nonprofit agencies, using program funds for the payment of participant wages. Work Experience is designed to promote the development of good work habits and basic work skills for individuals who have never worked or who have been out of the labor force for extended periods of time. Before, after or during enrollment in Work Experience, the enrollee must also participate in other services designed to increase basic education and/or occupational skills.
- j. On-the-Job Training emphasizes individualized skills training, upgrading and retraining. The participant is hired and trained by a public or private employer, who is reimbursed up to 50% of the employee's wages for the training period and contractually agrees to permanently hire the employee upon successful completion of training.
- k. Customized Occupational Training is training in technical skills specific to an employer's production process, machinery or tools. The curriculum is directed towards specific skills, is measurable, and includes standards set by the employer. Training is developed around employment opportunities for which a demand is clearly demonstrated, and requires a formal commitment by the employer to hire the trained participant upon successful completion of training.

Customized training could also include programs that combine workplace training with related instruction such as preapprenticeship programs, programs of advanced career training that provide a formal combination of on-the-job training and institutional training and internship assignments which prepare individuals for career employment, or training programs operated by the private sector. Participant wages are paid by JTS.

- l. General Occupational Training is training in technical skills found in an occupation which is in general demand throughout an area of industry. The training occurs in a classroom setting. It includes curriculum directed toward specific skills, which is measurable and meets standards set by the local education agencies. Training is developed around employment opportunities for which a demand is clearly demonstrated and where there exist opportunities for promotion, or where skills transferability is probable. Participants are credentialed by the training institution. General Occupational Training may be

subsidized fully or on a single-slot basis with program monies. It also includes skill upgrading and retraining conducted in an institutional setting, and entrepreneurial training.

- m. Academic Enrichment is used in the Title II-B program to meet the JTPA goals of improvement in school retention and completion and improvement in academic performance, including mathematics and reading comprehension. AE is defined as meeting one of the following criteria:

1. Enrollment in Educational Training (ET) and/or Employability Competency Training (ECT) for a minimum of 6 hours per week for the duration of the program.
2. Enrollment in any activity that results in academic credit, recognized academic credentials, or a professional license; or,
3. Enrollment in an activity that substantially prepares a youth for post-secondary education based on a determination that the activity is necessary to the pursuit of post-secondary education as documented by the youth's assessment; or,
4. Enrollment at a worksite or special project documented to provide contextual learning of academic or occupational skills, or SCANS competencies.

- n. Additional Barriers to Employment Selected by SDAs

The State communicates its policy for providing the above activities to individuals with serious barriers to employment enrolled in Titles II-A and II-C through planning instructions to SDAs.

JTPA §203(d) and §263(h) permit SDAs to select an additional barrier to employment to the category of eligible individuals for the adult program and one for the youth program. In their job training plans, SDAs have submitted requests for the addition of a seventh barrier for both adult and youth programs. Selection was based on the analysis of U.S. Census data and recommendations by the respective PICs. The SDA plans have been approved by the BETP.

Additional Barriers to Employment Selected by SDAs

	Title II-A	Title II-C
12 County SDA	Public Assistance Recipients	Welfare Recipient or Member of Family Receiving Welfare
Cumberland County SDA	Female Head of Household w/Income <100% LLSIL	Youth in Danger of Dropping Out of School
Penobscot Consortium SDA	Single Parent	AFDC Family Member

4. Older Worker Program Training and Support Activities Available

Because activities of all JTPA titles are delivered by the same service providers, the description of training and support services stated in Section III.B.3.a., above, applies to the Older Worker Program.

a. Procedure for State Consultation with PICs.

The procedure for consulting with PICs on activities to be provided is the same as that for all other JTPA programs. The vehicles for program adjustment consist of bimonthly meetings with the BETP and SDA directors, monitoring, planning instructions, and MHRDC review of program performance and plans.

- b. State Policy for Providing Services to Older Workers with Barriers to Employment.

As permitted by JTPA §204(d)(6)(B)(i), there is no requirement for enrollment into the Older Program of a minimum number of participants with barriers to employment. SDAs serve two very different groups of older workers: those of retirement age and those for whom retirement income is not immediately available. SDAs are required to follow the Older Worker Program eligibility requirements stated in JTPA §204(d)(5).

Beginning in PY '94, SDAs will be required to meet two performance standards: an Entered Employment Rate standard with the national departure point set at 62% and an average Wage at Placement with the national departure point set at \$5.45.

- c. Coordination between JTPA and Title V of the Older Americans Act

Planning instructions to SDAs require a description of how the SDA coordinates with Title V Senior Community Service Employment Program agencies and specifically asks SDAs to describe the objective of coordination and how the results of coordination will be measured.

5. Projected Use of 8% Education Grant Funds

- a. Recipients of Funds

The Governor has determined, in consultation with the Commissioners of the Department of Education and the Department of Labor that the 8% funds under JTPA Title II-A and II-C shall be targeted to two of the three allowable activities: school-to-work services of demonstrated effectiveness, including youth apprenticeship programs; and, coordinated approaches to education and training services, including model programs, designated to train, place and retain women in nontraditional employment (20 CFR 628.315 (c)(1) and (2)(i) and (iii)). Literacy and lifelong learning, while important, will not be addressed by the 8% Education Grant this program year.

- b. Projects to be Funded

All of the 80% funds of the 8% Education Coordination grant will be dedicated to the Jobs for Maine's Graduates (JMG) program. The Jobs for Maine's Graduates program served 29

schools throughout the state in 1993. The JMG program has four distinct features; school-to-work transition; drop-out prevention; career association; and cooperation between the labor, business and education communities.

The Maine Youth Apprenticeship Program, which was initiated in PY '92, will continue to receive funds in PY '94. The Maine Youth Apprenticeship Program is designed to create a workplace learning opportunity for Maine students. This initiative offers a three-year activity beginning in the eleventh grade and ending in the thirteenth year with a Maine Youth Apprenticeship Certificate of Mastery. Of the 20% funds under the 8% Education Coordination grant, \$100,000 will be dedicated to this program.

c. Anticipated Agreements

Separate planning instructions are issued to the JMG Program, which provide the JTPA requirements covering administrative and programmatic issues. (A copy of the JMG Planning Instructions and their plan is available upon request.) A sole source contract provides the agreement with MYAP for their coordination activities in the schools as the program is developed.

d. Plan developed by DOE for the Use of 8% Funds

A Memorandum of Understanding between the Maine Department of Education and the Department of Labor provides the operating documentation for the 8% grant. Specific coordination and performance goals are built into the JMG and MYAP plans and contracts.

e. Coordination of 8% funds

As stated above, separate planning instructions are issued to JMG, which provide the JTPA requirements covering administrative and programmatic issues. (A copy of the JMG Planning Instructions is available upon request.) All activities funded through the 20% are targeted to coordination.

f. Activities to Support HRIC Activities

N/A

g. Activities to Support the STJCC

The remainder of the 20% funds under the 8% Education Coordination Grant not used for the Maine Youth Apprenticeship Program will be dedicated to providing support to the Maine Human Resource Development Council (20 CFR 628.315(d)(2)(ii)(B)).

h. Assurance That at Least 75% of Funds Will be Spent on Eligible Economically Disadvantaged Participants with Barriers to Employment

A requirement specified in planning instructions for the JMG Program is that at least 75% of funds must be expended for eligible economically disadvantaged (JTPA) participants, each of whom is an individual experiencing barriers to employment. The JMG Plan must not only assure that this requirement will be met, but must explain the mechanisms in place for meeting the requirement.

i. Priority to Title III Participants and Persons with Barriers to Employment

The BETP assures that priority will be given to Title III participants and persons with barriers to employment in the event funds are not expended as described in Section III.B.5., above.

j. State Resources to Meet Match Requirements

The match required by the JTPA §123(a) applies to the 80% portion and is generated by general revenues through the State of Maine.

k. Performance Goals set by the State

State planning instructions to the JMG Program require a delineation of performance goals and a description of how they will be used. The State has agreed to accept the performance goals developed by the JMG program.

6. Capacity Building and Technical Assistance

a. How the State Has Involved SDAs in Planning the Use of Capacity Building and Technical Assistance Funds

The State has used a variety of methods to implement a bilateral avenue of consultation regarding capacity building with the SDAs, including SDA Directors' meetings, notices of the progress of the region-wide staff development and training initiative being coordinated by the New England Training and Employment Council (NETEC), and regular progress reports about the installation of the Comprehensive Information Management System (CIMS).

For programming beginning in '94, the BETP has instituted a Capacity Building Workgroup consisting of the BETP's Director for Administration and one representative from each of the three SDAs. The purposes of the workgroup will be to provide policy recommendations regarding the use of the State's 1/3 share of the Incentive Grant, and to coordinate the SDAs' use of their 2/3 share with overall State expenditure plans to maximize investments and reduce duplication of effort.

b. SDA Capacity Building and Technical Assistance Planning Requirements

The SDAs and the BETP shall attempt to reach consensus regarding contributions to technical assistance and training efforts for job training counselors. As in PY '93 programming, the BETP will not require the SDAs to use their incentive awards for capacity building during PY '94 - '95. Maine's incentive grant is small and SDAs should be free to balance the competing claims of serving participants and conducting staff development and training.

The BETP expects to be able to use a portion of its PY '94 funds for staff development and training. The Capacity Building Workgroup mentioned above will establish priorities among the following: continuing the turn-around-training initiative started by the NETEC Compact Assessment Training, implementing CIMS, identifying training needs around statewide goals and objectives, and developing training plans based on the national objectives contained in TEGL 3-93 and TEIN 27-93.

c. Capacity Building Funded by the 5% Incentive Grant

1. Maine's PY '94 Title II-A Incentive Grant is \$379,597 and the maximum allowable of 1/3 of the grant or \$126,532 will be reserved at the State level for statewide capacity building efforts. The State may opt to reserve 1/3 of the grant in following program years for similar purposes.

2. Plans for the use of 5% funds

The 2/3 share of the grant will be allocated to SDAs based on program performance. The 1/3 portion of the grant shall be used as follows.

- Five percent of the \$126,532 will be reserved for statewide administration of the grant. This amount (\$6,327) will pay for planning and administering staff development and training efforts, continuing the development of CIMS, and will support fiscal staff time involved in preparing quarterly reports regarding the grant.
- A reserve of \$70,789 will be held to continue the development and implementation of CIMS. The CIMS has been installed and completely field tested in one county as of this writing. It will be installed and fully operational in the Cumberland County SDA and another county within the 12 County SDA by the end of March, 1994. This funds reserved will support one and a half FTE, the purpose of which is to write the programming and electronic language linking the JTPA, UI, and Job Service data bases.

Of the \$70,789, about \$5,000 will be spent on updated Progress language software. A separate server will be purchased for about \$15,000 to support case management and statewide reports. Finally, \$3,000 in costs for networking hardware and software are included in this reserve.

- The balance of the grant, or \$49,416, plus any carry-over funds from PY '93 will be used for staff development and training as described above, model programming consistent with the overall goals expressed in this GCSSP and JTPA §202(c)(3)(A), and Technical Assistance for SDAs failing to meet performance standards.

The BETP does not expect the NETEC Compact Training surrounding model assessment approaches to generate a need for interstate training arrangements beyond the current contract.

d. Incentive Grant Distribution Formula

1. The PY '94 Incentive Grant will be distributed based on PY '93 performance according to the methodology described in the PY '93 *Modification to the Governor's Coordination and Special Services Plan* dated May 14, 1993.

The PY '95 and '96 Incentive Grants will be distributed based on PY '94 and '95 performance, respectively, according to the methodology described herein.

2. Amount Available for Earned Awards

Of the total amount of the 5% setaside for Title II-A and Title II-C Incentive Grants, $\frac{2}{3}$ will be available for earned awards. The remainder will be retained at the State level, as described in Section c. "Capacity Building Funded by the 5% Incentive Grant," above.

3. Potential Allocations to Each SDA

Of the total amount of 5% funds available for incentive awards, there is a potential amount available to be earned by each SDA. The potential amounts to each SDA will be created by the JTPA Title II-A 77% and Title II-C 82% allocation formulae. The proportion based on the II-A adult program formula will be in the same ratio as the incentive funds from the respective title (60%/40%). The potential allocations to SDAs in PY '95 will be based on the PY '95 Title II-A and Title II-C allocation formula.

4. Distribution Criteria and Proportion of Pools

The total potential pools available to SDAs for incentive awards will be apportioned based on three goals: 1) the six national DOL performance measures which will receive $\frac{5}{8}$ of the pool, 2) the number of placements in jobs with employer assisted benefits which will receive $\frac{1}{8}$ of the pool, and 3) the State goal of placing women into nontraditional employment which will receive $\frac{1}{4}$ of the pool. Incentives for model out-of-school youth programs will be awarded from the State's $\frac{1}{3}$ share of the grant.

5. Eligibility to Receive Earned Awards

In order to receive any incentive awards, each SDA must pass through two "gates." An SDA must meet a minimum of four of the six national performance standards and must have served at least 65% of its adult and youth participants who have one or more barriers to employment as described in JTPA §2203(b) and §263(b) and (d).

6. National Standards

So that incentive funds may be awarded for programs under Titles II-A and II-C that "exceed the performance standards established by the Secretary..." (JTPA §106(b)(7)(A), the following method will be used to distribute the potential incentive pool for national standards available to an SDA:

Each SDA's potential allocation for national standards will be divided into six parts, one part for each of these performance standards:

Adult Follow-Up Employment Rate,
Adult Weekly Earnings at Follow-Up,
Adult Welfare Follow-Up Employment Rate,
Adult Welfare Weekly Earnings at Follow-Up,
Youth Entered Employment Rate, and
Youth Employability Enhancement Rate.

For each part, an SDA will receive the entire part for exceeding the performance standard level.

7. Definition of Failing/Meeting/Exceeding National Standards

In order to meet a national standard, an SDA must achieve performance within the margin of the statistical tolerance range of the calculated standard. Performance at a level below results in failure to meet the standard; performance above results in exceeding the standard.

8. Employer Assisted Benefits

Each SDA's potential allocation for employer assisted benefits, consistent with JTPA §106(b)(7)(D)(ii), will be awarded based on each SDAs proportionate share of their

placements into jobs with employer assisted benefits as reported on SPIR Item #35c.

9. State Standards

Each SDA's potential allocation for placing women enrolled in the Title II-A 77% program and Title II-C 82% program into nontraditional occupations will be awarded based on the degree to which the goal is met.

The increment of awards is shown is as follows: An SDA will receive none of the share for a placement rate of less than 6.00%. The SDA will receive 60% of the part for a placement rate of 6.00% - 6.99%; 70% of the part for a placement rate of 7.00% - 7.99%; 80% for a placement rate of 8.00% - 8.99%; 90% for a placement rate of 9.00% - 9.99% and 100% for a placement rate of 10% or higher.

This methodology will be adjusted for the PY '95 goal of 12% NTO placements.

10. Redistribution of Unearned Incentive Funds

- a. Any incentive funds remaining after any award of less than 100% of the potential amount in the pool available for the 6 core standards, and employer assisted benefits will be returned to a statewide incentive pool and redistributed to SDAs who qualified to receive incentive awards. Each eligible SDA will receive a percentage of the redistributed funds that is the same as the percentage of the original statewide incentive pool that it earned through its performance.
- b. Any incentive funds remaining after any award of less than 100% of the potential amount in the pool available for the State goal of placing 10% of all women enrolled in the Title II-A and Title II-C programs into nontraditional occupations may be used by the BETP to provide workshops for staff development and/or purchase NTO resource material such as curricula and videos.

7. The State of Maine is not currently participating in the Title V JEDI Program.

III. Performance Standards

A. Adjustments to Standards

Each SDA's potential allocation for national standards will be divided into six equal parts, one part for each of the national performance standards below. No Governor's adjustment will be applied.

Adult Follow-Up Employment Rate,
Adult Weekly Earnings at Follow-Up,
Adult Welfare Follow-Up Employment Rate,
Adult Welfare Weekly Earnings at Follow-Up,
Youth Entered Employment Rate, and
Youth Employability Enhancement Rate.

The departure points and statistical tolerance ranges used for national standards are those indicated in JTPA Issuance No. 94-12, dated April 18, 1994.

B. Failure to Meet Performance Standards

Any SDA which fails to meet at least four of the six national standards will fail to qualify for an incentive award. An SDA failing to qualify for an incentive award may receive a Technical Assistance grant for the purpose of correcting deficiencies in performance. Up to the full amount of the incentive funds potentially available to that SDA may be used for the Technical Assistance grant.

Any SDA receiving a Technical Assistance award will be required to prepare a special corrective action plan which must be reviewed and approved by the BETP before Technical Assistance funds are released. A schedule of corrective action steps will be planned and agreed upon by the SDA and BETP.

The implementation of the corrective action plan will be monitored on a monthly basis by the BETP. Funds will be released for contracting on a project basis. Technical assistance funds not obligated after the ninth month of the program year in which the grant is awarded will be returned to the BETP for discretionary use.

Funds needed for technical assistance and training will come from the 1/3 capacity building portion of the incentive grant. Resources to remedy identified problems may come from the state staff, practitioners from other SDAs, and from professional staff procured for a specified need.

C. Failure to Meet Performance Standards for Two Consecutive Years

If any SDA continues to fail to meet national performance standards for two consecutive years, the Governor will notify the Secretary of Labor and the SDA and will develop and impose a reorganization plan according to the JTPA §106(j)(4).

IV. Procurement Procedures

The State has implemented procurement standards established under JTPA §164(a)(3). Administrative activities are consistent with the structure the BETP uses to promote program integrity and ensure compliance with the JTPA.

The most significant tool the BETP has in directing and influencing the fiscal policies of its subrecipients is the Financial Management System Manual. The FMS Manual requires serious attention since it contains critical compliance policies and procedures for documenting SDA and subrecipient grant activities. The manual currently contains policies and standards for the most important definitions, GAAP, cost principles related to allowable and unallowable expenditures, cost allocation and cost pool standards, and rules governing procurement. Policies governing cash management, program income, subrecipients/vendor standards, property management, record retention, close out standards, and audits and their resolution are being developed. The standards contained in the interim regulation are applicable until they are issued.

Significant time and effort has been devoted to cost allocations plans and procurement policies. Regarding cost allocation plans, the SDAs and the JMG subrecipient have submitted their plans to the BETP, the review of which focuses on cost pools and methods for accumulating and distributing assignable and unassignable costs. The plans continue to be reviewed and negotiated.

The BETP has issued a comprehensive statewide procurement policy, the contents of which include the following: standards for delineating procurement authorizations, code of conduct and conflict of interest clauses, policies promoting open and free competition, standards and policies governing sole source, small and large purchases, cost/price analysis policies, contract management standards. Each SDA is to submit their procurement plan based on the statewide policy to the BETP for review and comment. They are being reviewed and negotiated as of this writing.

V. Compliance with Non-Discrimination Provisions

The State of Maine is committed to a policy of equal opportunity and nondiscrimination in the operation of job training programs. No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in JTPA programs because of race, color, religion, sex, national origin, age, disability, political affiliation, or belief.

The Methods of Administration submitted to the Directorate of Civil Rights on November 11, 1993 commits the State to specific and ongoing equal opportunity and nondiscrimination efforts in compliance with the provisions of JTPA 29 CFR part 34.

As a condition to the award of financial assistance under JTPA from the Department of Labor, the Bureau of Employment and Training Programs assures, with respect to the operation of the JTPA-funded program or activity and all agreements or arrangements to carry out the JTPA-funded program or activity, that it will comply fully with the nondiscrimination and equal opportunity provisions of the Job Training Partnership Act of 1982, as amended (JTPA), including the Nontraditional Employment for Women Act of 1991; title VI of the Civil Rights Act of 1964, as amended; section 504 of the Rehabilitation Act of 1973, as amended; the Age Discrimination Act of 1975, as amended; title IX of the Education Amendments of 1972, as amended; and with all applicable requirements imposed by or pursuant to regulations implementing those laws, including but not limited to 29 CFR part 34. The United States has the right to seek judicial enforcement of this assurance.

Anti-Drug Abuse Act of 1986

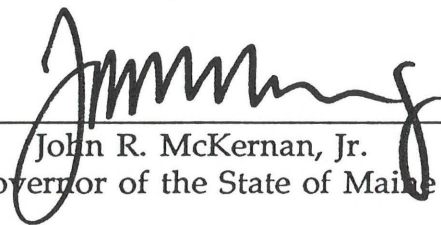
The State of Maine has certified its adherence to the Anti-Drug Abuse Act of 1988 to the Employment and Training Administration according to 29 CFR Part 98 of the JTPA regulations.

VI. Governor's Signature

The PY '94 - '95 Governor's Coordination and Special Services Plan incorporates the Job Training Reform Amendments of 1992 and has been reviewed by the Maine Human Resource Development Council and its Plan Review Committee. The Council has recommended the plan to the Governor, who has approved the plan.

Governor's Certification
of the
PY '94 - '95 Core Program Plans
for the
Maine Job Training System

I certify that the plans contained herein have been developed in accordance with JTPA §121 and have been developed jointly or in consultation with the agencies named in the law. This plan has been recommended to me by the Maine Human Resource Development Council in its function as the state job training coordinating council.



John R. McKernan, Jr.
Governor of the State of Maine



Date Signed