

WIOA Review- Oahu Local Plan

Section 1: Workforce and Economic Analysis

1.4 An analysis and description of adult and dislocated worker workforce development activities, including type and availability of education, training and employment activities. Include analysis of the strengths and weaknesses of such services, and the capacity to provide such services, in order to address the needs identified in 1.2. [WIOA Sec. 108(b)(1)(D) & 108 (b)(7)]

DEFICIENT

REQUESTED REVISION #1:

- While the table listed activities, strengths, weaknesses and the capacity to provide services, it did not assess each activity by those factors.
- The local plan failed to address the availability of education, training and employment activities.
- Clarify capacity to provide services. For example, is it true that there are enough qualified staff and sufficient jobs appropriate for job seekers?
- The ongoing Reemployment Services Eligibility Assessment (RESEA)/Unemployment Insurance (UI) activity was not included in the analysis. The capacity to provide for ongoing services are subject to USDOL guidelines, annual funding based on USDOL priorities.

REQUESTED REVISION #2:

- This section is confusing as it mixes contract/grant services and programs that are awarded to Work Hawaii, which is a city agency, not under the purview of the Honolulu WDB and/or are not part of the workforce system.
- Under “weaknesses” or “capacity to provide services” if a mandatory program/agency/activity is not currently provided at the AJC that should be noted.
- Under TANF activity, please add Job Development (Employer Engagement).

There is confusion with the word “activity” for sections 1.4 and 1.5 as it appears what is required is an analysis of each “program” within the local workforce system rather than each activity provided by the various programs. The Board pulled the Analysis of Current Workforce Development, Education and Training Activities chart that appears in the Hawaii WIOA Unified State Plan (pages 68-76) and had the local program contact revise each activity specific for the City and County of Honolulu. It is attached here for reference and will be included in the City and County of Honolulu’s Local Plan.

Title I-B – Adult and Dislocated Worker Programs

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> • Skills assessment for academic levels, work history, career interests and goals, and barriers to employment • Labor market information • Job search and placement assistance • Job retention follow up • Career counseling and pathway planning • Occupational skills training • On-the-Job training • Registered apprenticeships • Support services • Business services: Provide employers with qualified labor pool through assistance with recruitment fairs and financial incentives on training new and incumbent workers. 	<ul style="list-style-type: none"> • Ability to partner and stretch funds by leveraging resources • Solid long-term partnerships with core and most required partners • Aware of local business needs • Aware of targeting training resources for high –demand occupations • Access to extensive network of training providers • Established long term relationships with businesses who are repeat customers 	<ul style="list-style-type: none"> • Technology systems not yet established for integrating services efficiently with partners e.g. common intake, eligibility determination, referral, assessment, case management etc. • Not yet co-located with Employment Service at comprehensive center

Capacity to Provide Services:

- Limited resources for training, especially under the Dislocated Worker program
- Knowledgeable staff to provide services to both customers: job seekers and businesses
- Comprehensive center should have more staff resources to provide services once co-location is achieved with Employment Service and other required partner programs.
- Continuous improvements in the one-stop delivery system through clearer policy guidance will enhance integration of services, targeting of resources for priority populations, and effective collaborations among cross-trained staff.
- The capacity to provide services to people with disabilities has been increased with the resources from the Disability Employment Initiative (DEI) grant with a Disability Resource Coordinator (DRC) for American Job Centers to acquire and apply the knowledge about disability etiquette, people-friendly language, disability awareness, and workplace accommodations. The grant also develops Integrated Resource Teams with other partner agencies to coordinate and leverage resources for eligible participants.
- The capacity to provide new opportunities for participants to enroll in registered apprenticeships has been expanded by grants that support development of new program models in Information Technology, Health Care, Culinary Arts and other industries. The apprenticeship model is attractive to low income participants as they can earn while they learn. These apprenticeship programs are aligned with sector strategies identified at the Oahu Sector Summit to be supported by the joint efforts from economic development, education and workforce to improve overall economic prosperity and security for our community.
- The capacity to provide services to homeless individuals and families is enhanced by resources from HUD’s Community Development Block Grant and Tenant-Based Rental Assistance to provide work readiness training, work experience and rental subsidies to stabilize employment and housing situations and prevent these individuals and families from going back on the streets.
- Agreements with the Department of Human Services, Benefits, Employment and Support Services Division (BESSD) which administers TANF and SNAP programs provide job readiness, life skills training and job clubs under the Ho’ala program.
- Agreements with Title IV Division of Vocational Rehabilitation provide job readiness, life skills training, case management, and job development and placement services to people with disabilities, including those with visual impairment.

Title I-B Youth Program

Activities	Strengths	Weaknesses
<ul style="list-style-type: none">• Tutoring, study skills instruction• Alternative secondary school services or dropout recovery services• Paid and unpaid work experiences which may include summer or year round employment; pre-apprenticeship; internship and job shadowing; on-the-job training• Integrated (contextualized) education and training• Occupational skills training• Leadership development• Supportive services• Adult mentoring• Follow up services for at least 12 months• Comprehensive guidance and counseling which may include drug and alcohol abuse counseling and referral• Financial literacy education• Entrepreneurial skills training• Labor market information• Preparation for and transition to postsecondary education and training	<ul style="list-style-type: none">• Comprehensive case management as a best practice—using a single caring adult as a mentor and navigator to help youth connect with community resources• Integration of services from various programs to provide co-enrollment opportunities and blended funding• Use of social media to keep youth engaged• Encourage youth to design program activities and utilize their input to improve services• Established partnerships with organizations to offer community service projects that are meaningful to youth leadership development efforts• Services have integrated cultural enrichment components that are motivational and relevant to youth development• Flexibility in delivering instruction face to face and using web based curriculum	<ul style="list-style-type: none">• More pre-apprenticeship programs need to be established in addition to that developed with Building Industry Association.• Adult mentoring activities need to be expanded to recruit more mentors from industry, education and non-profit sectors.• Entrepreneurial training needs to be strengthened to attract more youth participation.• Support services do not include the resources to assist youth to obtain driver's license.

Capacity to Provide Services:

- The City’s Youth Services Center implements a variety of youth programs using a joint case management approach and a tracking database to maximize opportunities for co-enrollment and leverage of funding resources. E.g. YouthBuild participants are co-enrolled in WIOA Youth program to access services that are most effective in addressing the youth’s education, leadership development and employment training needs.
- Staff are experienced in serving youth with barriers to employment.
- Services to juvenile offender and ex-offenders are enhanced by the following activities:
- The Youth Services Center administers the only diversion program on Oahu--Juvenile Justice Center-- for first time minor offenders. The Ho’opono Mamo program uses an innovative approach –“civic citation” rather than “arrest” to divert from and prevent further involvement in the justice system. Cultural enrichment components and therapeutic counseling are integrated into the program.
- The Youth Services Center also administers the Proud To Be A Jerk Campaign and the Alcohol and Drug Abuse Division (ADAD) Community-Based System of Prevention Project, both of which are community mobilizing efforts to prevent the risky behaviors of alcohol and substance abuse among young people. Wraparound services are also provided to youth and their families using innovative intervention approaches.
- For youth with disabilities, the Youth Services Center implements the Summer Youth Employment for Title IV, Division of Vocational Rehabilitation, to provide summer employment opportunities with support from public and private employers as worksites.
- WIOA Youth program is co-located with the Adult and Dislocated Worker programs at the comprehensive one-stop center to provide flexibility in serving young adults 18 and older with multiple options.

Title II – Adult Education

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> • Adult basic education and literacy • Family literacy • English language acquisition • High-school equivalency preparation • Career Preparation and Job Training • Citizenship • Transition Services • Employability & Life Skills • Correctional Education 	<ul style="list-style-type: none"> • Flexibility • Individualized learning • Small Class Size • Integrated education and job training • Accommodation of varying learning styles • College and career readiness 	<ul style="list-style-type: none"> • Retention and persistence • Decrease in enrollment • Funding limitations, particularly for state leadership and critical support services

Capacity to Provide Services:

- Limited resources to provide current education and career preparation services, particularly support services such as transitions
- Will work on stronger and expanded relationships with local partners, particularly with employers and postsecondary institutions
- Have become part of a statewide career pathways system that will enhance services and drive college and career readiness
- Insufficient funds to provide necessary professional development for teacher quality

Title III – Wagner-Peyser Employment Services

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> • Assessment of experience, skills, and interests • Career guidance • Labor market information • Job search workshops • Referral to training & other services • Referral of job seekers to job openings, include matching job requirements with job seeker experience, skills and other attributes • Helping employers with special recruitment needs • Assisting employers analyze hard-to-fill job orders • Supporting and managing Hawaii's PMIS, the state-sponsored Job Board • Federal bonding for at-risk employers • Facilitating Federal Tax Credit for hiring offenders, persons with disabilities, other target groups • Counseling and job referrals for veterans with significant barriers • Promoting hiring of veterans • Helping employers and employees deal with layoffs 	<ul style="list-style-type: none"> • Long history of strong interagency partnerships • Relationships with business and industry • Responsiveness to business hiring needs • Use of technology such as self-service features in the PMIS • Affiliate Center that provide public access to computers, internet, job search materials and job information • Access to other funding sources to assist job seekers and business • Flexibility in serving business and job seekers 	<ul style="list-style-type: none"> • Funding levels constrain business outreach and individualized services to customers

Capacity to Provide Services:

- Capacity is enlarged because of braided resources with partners such as Adult Ed, VR, TANF, Community Colleges
- Affiliate Center has the physical presence of WIOA Adult/Dislocated Worker program staff and is co-located with Unemployment Insurance.
- Inadequate funding to support direct staff assistance to public during all office hours
- Insufficient funds for professional development

Title IV – Vocational Rehabilitation (VR)

Activities	Strengths	Weaknesses
<ul style="list-style-type: none">• Disability awareness• Compliance with Americans with Disabilities (ADA) of 1990 and other employment related laws• Vocational Rehabilitation Services and availability of other related resources• Recruitment and hiring of persons with disabilities• Provide support for current employees with disabilities	<ul style="list-style-type: none">• Training and technical assistance are provided timely and customized to meet the needs of the employers	<ul style="list-style-type: none">• Insufficient staffing to do outreach to all of the employers.

Capacity to Provide Services:

- Sufficient staffing to meet the needs of employers who call VR for training and technical assistance.
- Limited staffing to do outreach to “other” employers.

Career Technical Education

Activities	Strengths	Weaknesses
<ul style="list-style-type: none">• Serves youth and adults• Provides integrated education and vocational training• Fosters competency-based learning• Each student moves through a Program of Study• Focus on employability skills• Students get work experience• Earn industry-recognized credentials	<ul style="list-style-type: none">• Integrated education (k-12 and postsecondary)• Utilizes career pathways, career counseling and individual career plans• Multiple entry and exit options through the community college – industry-recognized credential, certificate, degree or transfer to baccalaureate degree program• Industry involvement in career pathway development and system vetted with employers• Clear sequence of coursework (non-duplicative, progressive, articulated)• Curricula and instructional strategies instill work readiness• Curricula competency-based rigorous and contextualized	<ul style="list-style-type: none">• Once a state career pathway system is adopted, may require adjustments to transition clients from other partners.• Incoming clients may require remediation• Limited staffing and funding• Client access to the system may be a challenge because of cost and time

<p>Capacity to Provide Services:</p> <ul style="list-style-type: none"> Existing structures have capacity to provide services. Financial and other support for clients to access the services are a challenge.

Community Services Block Grant Program

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> Customized program to address effects of poverty Community needs assessment Child health services Substance abuse services Career planning Worker training programs Housing assistance Employment search and placement assistance 	<ul style="list-style-type: none"> Assists individuals in need into housing and sustainable employment 	<ul style="list-style-type: none"> More outreach and promotion to reach most in need

<p>Capacity to Provide Services:</p> <p>Sufficient staffing and resources to meet needs of individuals in poverty.</p>

Indian and Native American Programs (CSP and SYSP)

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> Training, career, and follow-up services for adults who need to enter, re-enter, retain, or upgrade their unsubsidized employment leading to self-sufficiency. Supplemental youth services for ages 14-24 throughout the school year, during summer vacation, and/or during breaks during the school year; menu of services includes occupational skills training which must include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors of occupations or occupations in the local area; work experiences that have academic and occupational educational component; etc. 	<ul style="list-style-type: none"> Experience in operating statewide employment and training programs for Native Hawaiians, American Indians, and Alaska Natives since 1978 under CETA (Comprehensive Employment and Training Act); JTPA (Job Training Partnership Act); WIA (Workforce Investment Act); and presently under WIOA. 	

<p>Capacity to Provide Services:</p> <ul style="list-style-type: none"> Statewide program with offices and staff on the islands of Hawaii, Kauai (also serving Niihau), Maui, Molokai (also serving Lanai), and Oahu.

Job Corps

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> An academic and vocational skills 	<ul style="list-style-type: none"> Utilizes career pathways. 	

<p>training program for ages 16-24.</p> <ul style="list-style-type: none"> • Residential program with free room and board. • A self-paced program that allows participants two years to complete the program. • Income eligibility is required. • 10 vocational options in addition to college and advanced training at another Job Corps Center. • Job Placement Services provided. 	<ul style="list-style-type: none"> • Many opportunities to obtain industry recognized certification. • GED and C-Based diploma program • Recreational activities provided • Counseling services provided • Basic Medical , dental , mental health services • Open entry/open exit program • No cost to the participants. • Driver's education available. 	
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Capacity to Provide Services:

- Hawaii Job Corps has the capacity for 211 students on Oahu and 128 on Maui.

Local Veterans' Employment Representatives (LVER)

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> • Facilitates employment, training and placement services furnished to eligible veterans and spouses by the American Job Centers • An outreach strategy that effectively links clients to jobs with achievable placement potential • Employer seminars to promote the hiring of veterans • Job search workshops conducted in conjunction with employers • Engages veteran job search groups to facilitate access to employers • Educates partner staff on veteran program initiatives and changes 	<ul style="list-style-type: none"> • All LVER staff finished professional development training required by DOL • LVER are some of the most experienced staff in the agency • LVER keep partner and American Job Center staff vigilant on program standards with services and changes. 	<ul style="list-style-type: none"> • Existing unfulfilled potential in collaborating with employers to create robust job search workshops and job search groups • DOL has yet to establish uniform LVER performance standards for states

Capacity to Provide Services:

- Given present funding levels and DOL priorities for LVER services, current LVER resources are generally in proportion and sufficient to serve needs of eligible veterans, spouses and the business community.

Disabled Veterans Outreach Program (DVOP)

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> • Provides intensive employment services to a prioritized group of eligible veterans and spouses as directed by the Secretary of DOL • Facilitates placements with 	<ul style="list-style-type: none"> • Hawaii DVOPs are on pace to achieve the DOL standard of 90% of clients served will receive intensive services 	<ul style="list-style-type: none"> • Working earnestly to master their craft to mitigate all shortcomings

<p>intensive service to 90% of all clients served</p> <ul style="list-style-type: none"> • Conducts relationship building, outreach and recruitment activities with other service providers in the area, to enroll priority clients • Conducts targeted outreach to promote intensive employment services for priority clients • Provides dynamic labor market information on occupational wage trends, growth projections, etc., resulting in sensible informed vocational decisions • Assists clients with targeted cover letter and resume development 		
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Capacity to Provide Services:

- The state will request additional DOL funds to bolster DVOP staff resources from the current three full- time positions to four full-time positions for the current fiscal year.

Senior Community Service Employment Program (SCSEP)

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> • Provides economically disadvantaged older persons, fifty- five years or older, an opportunity for employment • Fosters useful part-time opportunities in community service activities • Seniors earn income while developing employable skills • Yearly physical examinations • General and specialized training • Opportunity for unsubsidized employment 	<ul style="list-style-type: none"> • Individualized plan for employment • Meaningful activities outside the home environment, including the continuation of mental, physical and socialization activities • Referral to other supportive services • Workers' compensation coverage • Eligible for unemployment benefits • Earn social security credits 	<ul style="list-style-type: none"> • Limited number of slots available for program participation • Participants lack education and experience to apply for high paying jobs

Capacity to Provide Services:

- Limited number of slots for program participants based on funding from USDOL
- Limited staffing to do employer outreach for unsubsidized employment placement
- Work with local partners to maximize resources for older workers, SCSEP grantees have established agreements with other service providers such as American Job Centers, the private sector, educational organizations and adult literacy agencies

Temporary Assistance for Needy Families

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> ▪ Work Program for families that receive TANF benefits ▪ Case Management ▪ Assessments and Employment / 	<ul style="list-style-type: none"> ▪ Statewide work program ▪ Partnership w/ other state & county agencies to provide specific services 	<ul style="list-style-type: none"> ▪ Unable to assist families w/out children ▪ Must be TANF recipient to participate in work program and

<p>Barrier Reduction Plan Development</p> <ul style="list-style-type: none"> ▪ Job Placement Services (subsidized and unsubsidized) ▪ Job Search Assistance ▪ Job Readiness Training ▪ Work Experience ▪ Education assistance (ABE, VET, Post-Sec) ▪ Advocacy and supportive services for parents w/ DV-status, temp disabled (VR), substance abuse ▪ Extended services through POS contracts with CBOs to provide services that meet TANF Purposes 1 and 2 	<ul style="list-style-type: none"> ▪ Procure broad range of services under TANF Purposes 1 & 2 ▪ Individualized case management services ▪ Support service payments, i.e. transportation, work- related experience, education, child care, limited rent assistance through work program ▪ Transitional supportive services for employed families who exit TANF ▪ Assist families w/no TANF months but temporarily disabled, DV- status or recovering from substance abuse 	<p>TANF-eligible to receive procured CBO services (TANF Purposes 1 & 2)</p> <ul style="list-style-type: none"> ▪ Temp disabled, DV-status and recovering substance abuse parents are considered work eligible individuals (i.e. meet work activity requirements) ▪ Core educational activity limited to 12 months in lifetime ▪ Other educational activities are non-core (i.e. ABE, JSK, EDRE) ▪ Limited job search activities, 120 or 180 hours in 12-mos period ▪ Requirement to meet Work Participation Rates
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<p>Capacity to Provide Services:</p> <ul style="list-style-type: none"> ▪ Design the work program to meet TANF families' needs, in accordance with federal regulations. ▪ Continue to develop partnerships with other workforce development agencies (public and private) ▪ Continue to develop partnerships with UH/CC ▪ Better inform work program participants and case managers of available education and training opportunities and resources ▪ Connect work program participants, case managers, educational institutions and employers ▪ Able to service TANF recipient families statewide but limited/no resources to service 2nd parents of 2- Parent TANF families ▪ Limited to 60 TANF months in lifetime ▪ Incurred direct and indirect expenditures must be within TANF federal regulations (i.e. benefits and services meet the 4 purposes, TANF recipients, youth and TANF-eligible individuals and families)

Trade Adjustment Assistance (TAA) Program		
Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> • Reemployment and case management services • Training • Job search allowance • Relocation allowance • Additional unemployment insurance in the form of Trade Readjustment Allowances (TRA) • Health Coverage Tax Credit (HCTC) • A wage subsidy for re-employed workers aged 50 or older 	<ul style="list-style-type: none"> • Provides in-depth training and support for trade-affected workers for job training and/or job search • Offers older workers (50+ years old) a choice of training or income support if working part- time 	<ul style="list-style-type: none"> • Services available to limited population who are adversely affected by foreign trade as certified by USDOL • Petitioning process takes time, requires data about employer's business and reasons for layoffs

<p>Capacity to Provide Services:</p> <ul style="list-style-type: none"> • Extensive support for TAA participants • Allows requests for more funds, as needed for eligible participants

Reemployment Services Eligibility Assessment (RESEA)/Unemployment Insurance (UI)

Activities	Strengths	Weaknesses
<ul style="list-style-type: none"> • Assist unemployment insurance claimants in returning to work quickly • Provide group sessions on labor market information, job search requirements • Provide individualized services on career counseling, assessment of career goals • Assist with job search, referral and placement 	<ul style="list-style-type: none"> • Staff providing services are knowledgeable about labor market and job search resources • Activities are coordinated with other Wagner-Peyser services • Coordination with Unemployment Insurance Division has an established system for referrals and reports 	<ul style="list-style-type: none"> • Not sufficient funding for staff time to conduct follow up • A small number of claimants are not motivated to receive services

Capacity to Provide Services:

- Limited resources and time to provide in depth counseling or follow up.
- The capacity to provide for ongoing services are subject to USDOL guidelines, annual funding based on USDOL priorities.

1.5 An analysis and description of youth workforce activities, including activities for youth with disabilities. Include analysis of the strengths and weaknesses of such services, and the capacity to provide such services. [WIOA Sec. 108(b)(1)(d) and 108(b)(9)]

DEFICIENT

REQUESTED REVISION #1:

- While the table listed activities, strengths, weaknesses and the capacity to provide services, it did not assess each activity by those factors.
- The analysis of the Youth list is almost identical to that of the Adult programs. Surely, there are different strengths, weaknesses and capacity of the Youth program.
- Clarify capacity to provide services. For example, is it true that there are enough qualified staff and sufficient jobs appropriate for job seekers?

REQUESTED REVISION #2:

- Youth with disabilities is not addressed. Please place response for 1.5 in the 1.5 Section.

There is confusion with the word "activity" for sections 1.4 and 1.5 as it appears what is required is an analysis of each "program" within the local workforce system rather than each activity provided by the various programs. The Board pulled the Analysis of Current Workforce Development, Education and Training Activities chart that appears in the Hawaii WIOA Unified State Plan (pages 68-76) and had each local program contact revise each activity specific for the City and County of Honolulu. See chart above in Section 1.4 for an analysis of current Title I-B Youth Program. This will be added to City and County of Honolulu's Local Plan.

1.6 Identify successful models and best practices for youth workforce activities relevant to the local area.
[WIOA Sec. 108(b)(9)]

DEFICIENT

REQUESTED REVISION #1:

- Provide performance measures to support the designation of Oahu's successful workforce services for youth.
- Specific, local successful models and best practices for youth workforce activities should be more clearly identified. Extraneous text should be deleted. (pgs. 32-33)
- Indicate whether these models and practices are implemented system-wide or narrowly focused with plans for wider application.

REQUESTED REVISION #2:

- Is YouthBuild the only successful model? Is it system-wide? Will it continue, will it be expanded?
- Provide performance measures to support the designation of Oahu's successful workforce services for youth. The performance goals were reported but no results were reported to substantiate that the Youth Build Honolulu program was or was not successful.
- Specific, local successful models and best practices for youth workforce activities should be more clearly identified. As noted above, since no results for YouthBuild Honolulu is given, whether or not the program is successful is unknown.
- Indicate whether these models and practices are implemented system-wide or narrowly focused with plans for wider application. No response.

These are the performance goals for YouthBuild:

- Placement in Employment or Education – 70% of the participants placed in employment (including military) or enrolled in post-secondary education and/or advanced training/occupational skills training in the first quarter after exit
- Attainment of a Degree or Certificate – 70% of the participants must attain a diploma, GED or certificate by the end of the 3rd quarter after exit
- Literacy and Numeracy Gains – 60% of the participants who are basic skills deficient at enrollment will increase one or more educational functioning levels
- Retention Rate – 75% of the participants placed in employment or education in the 1st quarter after exit are employed or in education in the 2nd and 3rd quarters after exit
- Recidivism Rate – 20% or below of the participants who are re-arrested for a new crime or re-incarcerated for revocation of the parole or probation order within one year of enrollment in YouthBuild.

YouthBuild Honolulu is an alternative education and occupation skills training program that focuses on preparing non-high school graduates, ages 17.5 to 24 to become part of a critical "young adult pipeline" of workers to replace the many experienced workers who are exiting our workforce in local high growth and high demand industries such as education, health, business services and leisure and hospitality (tourism) while simultaneously increasing the supply of affordable housing for Honolulu's low-income families.

YouthBuild Honolulu and its network of partners will provide education, training and related services such as alternative high school diploma program, tutoring, pre-apprenticeship construction training leading to an industry recognized credential, hands-on construction skills training, leadership development, employment preparation, career exploration and planning and much more. After completing the program, youth receive 12- months of follow up services to help them secure and retain jobs, enter post-secondary education and stay in school which eventually will lead to a degree or credential and higher wages.

Since 2009, YouthBuild participants are dual enrolled into the WIA or WIOA adult or youth program. Dual enrollment increases the number of services available to the youth therefore increasing the likelihood that these youth will achieve their educational and employment goals. For example, the WIOA youth case manager or WIOA employment consultant works with the YouthBuild teacher and counselor to monitor the participants progress in the program and in the 12-month follow up phase.

Section 2: Strategic Vision and Goals

2.3 Describe how the local board's vision and goals contribute to each of the Unified State Plan goals:

- a. To provide coordinated, aligned services.
- b. To prioritize services to vulnerable populations with barriers to employment as described under WIOA, including homeless individuals and Native Hawaiians, which are currently of critical concern to the state.
- c. To develop sector strategies and a career pathways system that will integrate education and training, and move skilled job seekers into growth industries.
- d. To fully engage employers in the workforce development system to address the talent shortage.

The Hawaii Unified State Plan includes a number of strategies under each goal. It is up to the discretion of the local board to determine what strategies best fit their local needs. (pgs. 77-79)

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REQUESTED REVISION #1:

- The State's goals were not properly labeled or addressed in the response.
- Add veterans to homeless and Native Hawaiians since veterans have priority for all DOL funded programs (2.3 b).
- Add all veterans receive priority for all DOL funded programs, whether or not they have an SBE.
- The answer provided mixes the responsibilities of the State with those of the Local Board. There seems to be a misunderstanding of the scope of the board's roles and responsibilities. For instance, "the State will develop and provide necessary training..." why is this on the local board's list? The board's list should be focused on its actions. For example, the board cannot make system improvements in the PMIS system. The board can however, provide input, can work with the state, can support the State's efforts, can improve their own web presence, etc.
- If the board is going to develop and implement policies and procedures that will ensure that vulnerable populations with barriers to employment, when are they going to do that? An action plan with more specifics is necessary.
- How is the board going to build a better business climate? Is this the role of the board? How will the board support policies that are mentioned? Does the board have the capacity and resources to do this?
- How will the board address the high cost of living? Is this the role of the board? Does the board have the capacity and resources to do this? Does the board have the capacity and resources to do what is proposed in this section?
- Remove those items that are not the OWDB's responsibility (e.g. State provision of staff training on its centralized data system, addressing the high cost of living, or making system improvements to the PMIS site).
- Rephrase statements that misplace responsibility (e.g. each core partners, not OWDB, should define the roles and responsibilities of their staff within the One-Stop system).

REQUESTED REVISION #2:

- It seems that the local board only wishes to duplicate the state plan and not develop a comprehensive plan that addresses the needs of the City and County of Honolulu's job seekers.

The Board referenced the goals in the City and County of Honolulu Local Plan as labeled in the Hawaii Unified State Plan, page 83, numbered 1 through 5 (as suggested in the question). However, these same goals are labeled differently in question 2.3. The Board chose to reference the goals as labeled in the Hawaii Unified Plan since it is important to show connections in the Local Plan to the Hawaii Unified State Plan.

Veterans are included in Goal #2 of the City and County of Honolulu Local Plan (page 35) along with homeless individuals and Native Hawaiians.

The Board describes what the State will do as described in the Hawaii Unified State Plan with reference to the

centralized data system (i.e., improvements to the PMIS). Once the State has this established, the Board anticipates adequate training will be provided by the State so that this is implemented appropriately and consistently at the local level. This process is what is described in the City and County of Honolulu Local Plan, and the Board will support the State's implementation of the PMIS. The Board feels this does not misrepresent State v. Local Board responsibilities.

As indicated in question 2.3, strategies to achieve the vision and goals were referenced from the Hawaii Unified State Plan (pages 77-79). The Board and stakeholders pulled from that list of strategies (as suggested in the question) to support achievement of the goals at the local level, i.e, for the City and County of Honolulu. The plan, which includes specific activities and timeline to address the goals and strategies mentioned in this section, is not appropriate for Section 2 of this Local Plan. Rather, the activities and timeline are appropriate for Sections 3 and 4 of the Local Plan. Therefore, later sections of the City and County of Honolulu Local Plan discuss activities and timeline for the items mentioned in the requested revisions, i.e., serving vulnerable populations, engaging employers to strengthen the business climate, and prioritizing living wage occupations to accommodate the cost of living in the City and County of Honolulu. The Board does not feel this misrepresents state v. local board responsibilities, but rather applies the strategies described in the Hawaii Unified State Plan to the local level.

Each core partner will define the roles and responsibilities of their staff within the One-Stop system.

2.4 Describe how the local board's goals relate to the achievement of federal performance accountability measures to support local economic growth and economic self-sufficiency. [WIOA Sec. 108(b)(1)(E)]

DEFICIENT

REQUESTED REVISION #1:

- Add block to identify veterans receiving priority for all DOL funded program services and tie that to a performance metric of meeting federal requirements for veteran entered employment and employment retention rates as well as meeting DOL requirement for priority of service to veterans.
- Clarify how performance data is used to meet goals by improving service provider outcomes and informing strategic planning to support local economic growth and economic self-sufficiency.

REQUESTED REVISION #2:

- How will the City and County of Honolulu ensure that veterans receive priority?
- The statement lacks a connection between providing services and meeting negotiated performance metrics. There is no intent to meet state negotiated performance goals.
- Please see requested revision #1 requests.

The workforce development system in the City and County of Honolulu will ensure that veterans receive priority of services for all USDOL funded programs, particularly services that move unemployed veterans into sustainable employment.

The Board will review performance data annually and establish a continuous improvement strategy to improve service provider outcomes and inform strategic planning efforts that support local economic growth and self-sufficiency.

Section 3: Local Area Partnerships and Investment Strategies

3.1 Taking into account the analysis in Section 1, describe the local board's strategy to work with the organizations that carry out core programs to align resources in the local area, in support of the vision and goals described in Question 2.1. [WIOA Sec. 108(b)(1)(F)]

DEFICIENT

REQUESTED REVISION #1:

- Describe how the local board, through its OWDB Executive Director, is working with staff from the core programs, to gather and use their input to align resources and integrate services to implement workforce initiatives. A timeline would be useful.
- Briefly summarize how the Memorandum of Understandings (MOU) commits each core partners to delivering their services through the One-Stop Center and/or system in support of Oahu's vision and goals.
- Lacks description of UI involvement/collaboration to align resources at the One-Stops to provide access to customers.

REQUESTED REVISION #2:

- Include a timeline for the strategy to work with the partner organizations to align resources in support of the vision and goals in 2.1; cannot just say it is in the MOU, it must be also in the local plan.
- In addition to service provision, the summary of the MOU should include the requirement of a cost allocation formula/plan which must be approved by each Core and Mandatory partner.

The Board and OWDB staff developed partnerships with representatives of core partner agencies, including UI, through the development of the City and County of Honolulu Local Plan. The Board will continue to strengthen these relationships by meeting quarterly to further coordinate (align and integrate) services. This ongoing communication will help establish and re-establish roles and responsibilities among the partners, negotiate action plans, and review progress. If over time the Board and core partners feel meeting quarterly is too often, the Board will consider altering to biannual meetings. In addition, the Oahu Branch Manager of the Unemployment Division will be invited to all OWDB full board meetings and has indicated that she is willing to attend as her schedule permits.

The MOU will be developed as part of the negotiation process with a new one-stop provider Spring 2017. The Board will ensure that core partners as well as other services providers include in the MOU how their services will directly support the vision and goals of the City and County of Honolulu Local Plan as well as link to negotiated performance targets.

3.2 Identify the programs/partners that are included in the local workforce development system. Include, at a minimum, organizations that provide services for Adult Education and Literacy, Wagner-Peyser, Vocational Rehabilitation, Temporary Assistance for Needy Families, Supplemental Nutritional Assistance Program, and programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006. [WIOA Sec. 108(b)(2)]

DEFICIENT

REQUESTED REVISION #1:

- It would be helpful for readers if the partners and their services/programs are identified. Since every local area has different service providers, matching organizations with their programs or services would help the reader understand what activities are available in the local area and who is providing them and why the local board is seeking an MOU with the organizations mentioned.
- In the list, what is CIO Council of Hawaii?

REQUESTED REVISION #2:

- Is CIO an acronym for something? If it is, please add it to the answer above.
- I would just add, "Department of Human Services" which is the department that the Division of Vocational Rehabilitation (DVR) resides.
- I would add, "Benefit Employment and Support Services Division (BESSD)" which is the division in which SNAP resides.
- I would delete "WorkHawaii/City and County of Honolulu" for Temporary Assistance to Needy Families (TANF). TANF is in BESSD which is in the Department of Human Services.

Here is the revised list of partners:

Adult Education and Literacy

McKinley and Waipahu Community Schools for Adults
Hawaii Department of Education

Wagner-Peyser

Department of Labor and Industrial Relations Oahu Branch
Jobs for Veterans

Vocational Rehabilitation

Division of Vocational Rehabilitation

Temporary Assistance for Needy Families

WorkHawaii for City and County of Honolulu

Supplemental Nutritional Assistance Program

Department of Human Services

Carl D. Perkins Career and Technical Education Act of 2006

University of Hawaii System of Community Colleges:

- Kapiolani Community College
- Leeward Community College
- Windward Community College
- Honolulu Community College

University of Hawaii Manoa

University of Hawaii West Oahu

Innovative Offender Re-entry Program

WorkNet Inc.

Native Hawaiian Non-Profit Organization

Alu Like

Title 1-C

Hawaii Job Corps

Senior Community Service Employment Program (SCSEP)

Honolulu Community Action Program

Respite Companion Services Program

Department of Human Services

Unemployment Insurance Services

The CIO Council of Hawaii has over 130 members, representing most of Hawaii's business and government sectors, who share a vision for improving technology adoption throughout those sectors in the State of Hawaii.

The Board will explore new partnerships through signed MOUs with the following agencies: High Technology Development Corporation

Temporary Assistance to Needy Families (TANF) Program and Supplemental Nutrition

Assistance Program (SNAP)

Office of the State Director for Career and Technical Education

Shidler College of Business

Hawaii Literacy

Goodwill Hawaii

Kamehameha Schools Bishop Estate Chamber of Commerce of Hawaii

Hawaii Strategic Development

Corporation Restaurant Association

Office of Hawaiian Affairs

Oahu Economic Development Board

Center on Disability Studies, University of Hawaii Manoa

University of Hawaii West Oahu

Juvenile Justice Center Family Service Agency

Hawaii Alliance of Community Based Economic Development

Department of Hawaiian Home Lands

Department of Business, Economic Development and Tourism

Department of Public Safety

CIO Council of Hawaii Hawaii

Bankers Association Hawaii

Business Roundtable

Hawaii Agriculture Foundation

3.3 Describe efforts to work with partners identified in 3.2 to support alignment of service provision to contribute to the achievement of the Unified State Plan's goals and strategies. [WIOA Sec. 108(b)(2)]

DEFICIENT

REQUESTED REVISION #1:

- An annual review may be insufficient during the early stages of this implementation.
- What does it mean that the MOU's will be reviewed annually? Reviewed for what? Amended annually, re-signed annually? Is annually an achievable goal?
- What is Oahu's Coordinated Service Delivery Model? Where is it described?
- How will the board work with DLIR's WDD, the agency for apprenticeships, TAA, RESEA, WP, ETF, and is the convener for several skills based boards?
- Outline efforts and/or plans to with listed mandatory partners and community stakeholders to align their services so that its delivered in the most comprehensive manner, consistent with the Plan.

REQUESTED REVISION #2:

- An annual review of MOUs may be sufficient; however, efforts to work with the partners should not be limited to signing an MOU and a subsequent annual review. Coordination and collaboration of partners should be ongoing on a regular basis.
- This is what is written in 3.3: Oahu's *Coordinated Service Delivery Model* will ensure achievement of the vision of goals of our workforce system by reaching and serving vulnerable jobseekers and moving them into sustainable employment and self-sufficiency.
- Please include a description of the Coordinated Service Delivery Model in this section and provide location references so the reader doesn't need to search the entire plan for it.

The Board has limited staff and will only be able to review MOUs on an annual basis.

This annual review of MOUs will help establish and re-establish roles and responsibilities among the partners, negotiate action plans, and review progress. The review may mean that something within the MOU needs to be revised, or it may mean that all is good and all that is needed is re-signed to re-establish the partnership. Annual review of MOUs helps to ensure they have more meaning, are regularly evaluated and are "in the know" as staff changes over time.

The Coordinated Service Delivery Model is described in the City and County of Honolulu's Local Plan, starting in Section 3.3 and throughout the remainder of the Local Plan.

The WDD representative, as a core partner, will ensure appropriate inclusion of workforce programs.

The implementation of the Coordinated Service Delivery Model was developed and will be implemented for the specific purpose of coordinating services among partners in the most comprehensive and consistent manner possible in alignment with the Hawaii Unified State Plan.

3.4 Describe the local board's plans and strategies for, and assurances concerning, maximizing coordination of services provided by the State employment service under the Wagner-Peyser Act and services provided in the local area through the one-stop delivery system to improve services and avoid duplication of services. [WIOA Sec. 108(b)(12)]

DEFICIENT

REQUESTED REVISION #1:

- Response should address how all partners and stakeholders maximize coordination of services with the Wagner-Peyser provider to improve service delivery and avoid duplication in the local One-Stop system.

REQUESTED REVISION #2:

- This needs to be in the local plan, not just in the MOU.

The Board believes coordination of services with the Wagner-Peyser provider will be articulated through the development of the MOU as well as in the RFP process to select a new one-stop provider. The MOU will include roles and responsibilities of each partner agency in order to maximize coordination of services. The workforce development system in the City and County of Honolulu will operate holistically in terms of core partners, and not be seen as isolated programs (i.e., Wagner-Peyser). In the spirit of WIOA, core partners will work together to coordinate services as a whole. The implementation of the City and County of Honolulu's Coordinated Service Delivery Model will help to ensure efficient coordination of services, avoid duplication of services, and establish all partners roles and responsibilities.

3.6 Describe how the local board will coordinate workforce investment activities carried out in the local area with economic development activities carried out in the State, and promote entrepreneurial skills training and microenterprise services. [WIOA Sec. 108(b)(5)]

DEFICIENT

REQUESTED REVISION #1:

- Expand response to explain what economic development activities are being carried out and how local workforce activities are coordinated with them. What specific entrepreneurial skills training or microenterprise service(s) have been promoted?
- The first paragraph is confusing, please consider rewriting it. Although the board lists activities that will be supported, how that will be accomplished is not described. For example, how does a local board support small and medium-sized enterprises?

REQUESTED REVISION #2:

- The action plan is very vague: future board agenda, no timeline for board action.

The Board identified activities that will be implemented to support economic development. The Board will need to establish a committee to further articulate an action plan to carry out each of these activities. This will be an item on a future Board agenda to establish a process and timeline to develop this action plan. The Board hopes to carry out the economic activities in coordination with workforce activities through the implementation of the statewide career pathways model that is described in this Local Plan, including entrepreneurial and microenterprise services.

Revised first paragraph: The Board will **support** workforce investment activities that seek to improve the economic well-being and quality of life for **the City and County of Honolulu** by **engaging employers of all sizes who create and sustain jobs** and **support livable wages in an effort to grow the** local economy.

It is the intent of the Board to carry out the activities listed in this section through employer engagement and implementation of the statewide career pathways model.

3.7 Describe how the local board will coordinate education and workforce investment activities with relevant secondary and postsecondary education programs and activities to coordinate strategies, enhance services, and avoid duplication of services. [WIOA Sec. 108(b)(10)]

DEFICIENT

REQUESTED REVISION #1:

- Response did not describe how coordination will take place.

REQUESTED REVISION #2:

- Describing individual roles is not coordination, the Board must have a role in coordination.

The Board feels coordination of services with education providers is adequately articulated in this section. Each agency is identified, each agency's role is recognized, and a summary of how the Board will coordinate services among the programs is described.

Section 3.7, page 44 of the City and County of Honolulu Local Plan describes coordination: Postsecondary education providers play a key role in workforce investment activities by providing occupational skills training, job-related instruction for apprenticeships, skill upgrading for incumbent workers, or customized training to meet a business or a group of businesses' specific needs. Participants select training programs from providers that are on the Eligible Training Provider List after conducting labor market research. Oahu WorkLinks partners with training providers such as the Community Colleges or private providers to develop new training programs that meet industry needs: e.g. a Patient Service Representative program was developed with input from healthcare employers; discussions have been ongoing about training for new jobs in rail operations and maintenance; new curricula have been developed for Software Developer and Web Developer for the Information Technology (IT) Apprenticeship program. With the launch of Sector Partnerships beginning in 2017, there will be even closer collaboration between economic development, workforce and education partners to support the agenda driven by private industry.

3.8 Describe how the local board will coordinate workforce investment activities with the provision of transportation, including public transportation and other appropriate supportive services in the local area. [WIOA Sec. 108(b)(11)]

DEFICIENT

REQUESTED REVISION #1:

- The answer doesn't describe how the board will coordinate workforce activities with supportive services. The list of the services is not sufficient. There is no mention of coordination between core and mandatory partners. Indicate which service providers offer transportation assistance.
- Existence and limitations of all transportation and other support service resources for Adults. For example, do support services include payment of car repairs, and if yes what is the cap?

REQUESTED REVISION #2:

- Provide an action plan to develop the comprehensive strategy.
- Add bus passes, handivan coupons or mileage allowance is provided by DVR for VR eligible clients.
- Add that Benefit, Employment and Support Services Division (BESSD) provide child care services for eligible clients.

Currently, the only transportation support to workforce development participants are bus passes provided through WIOA Title I Youth and YouthBuild programs based on demonstrated need to support employment activities. The other support services listed in this section are those that are currently offered upon eligibility, which are only pursued for participants as a result of self-disclosure. However, through the development of this Local Plan, it was discovered that these services are not clearly defined or applied consistently throughout the workforce development system. Therefore, this City and County of Honolulu Local Plan will be used as a guide for the Board to develop a comprehensive strategy to coordinate workforce investment activities with the provision of transportation, including public transportation and other appropriate support services. As soon as this strategy is established, which will take place through the RFP solicitation of a new one-stop provider; it will be included in the Local Plan.

3.11 Based on the analysis described in Section 1, describe the local investment strategy toward targeted sectors strategies identified in 3.10 and targeted populations identified in 3.9.

DEFICIENT

REQUESTED REVISION #1:

- The local plan does state that “populations identified in 3.9 will receive priority of services for sector strategy efforts...” The local plan does not include a discussion on how priority of services will be implemented- e.g. if an individual is a veteran with a disability, will the get services before individuals non-targeted populations?
- Since this section was written, there has been a change in the way sector strategies will be addressed within the state, with each county leading sector strategies. Suggest updating this section to describe the new structure, but more importantly, to focus on the work on the local board, rather than describing the work of the State board.

REQUESTED REVISION #2:

- This question is about investment strategy, to both populations and sectors, so please be sure that is the strategy that is developed. Please provide a timeline for the board to develop the strategy.
- The section describing the state’s role is unnecessary.

The Board will develop a strategy to ensure target populations receive priority of services. This will be established through the RFP solicitation of a new one-stop provider, the negotiation of MOUs and coordination of services among core partners. The Local Plan does describe how outreach will be provided to each vulnerable population, but the Board needs to further develop strategies to ensure priority of services to these populations. Once established, it will be included in the Local Plan, possibly through the further development and implementation of the Coordinated Service Delivery Model, a priority of service checklist could be included.

The Board will establish and convene sector partnerships in the priority areas articulated in the Local Plan. The Board role in this effort will be to develop and align workforce and economic priorities that will then be emphasized in the implementation of the career pathways model. For example, sector priorities are determined by LMI and economic development priorities, sector partnerships are then established based on the determined sector priorities, the sector partnerships then drive the career pathway efforts that will be implemented throughout the workforce development system.

3.12 Identify and describe the strategies and services that will be used to:

- a. Facilitate engagement of employers, including small employers and employers in in-demand industry sectors and occupations, in workforce development programs in addition to targeted sector strategies;
- b. Support a local workforce development system described in 3.2 that meets the needs of businesses;
- c. Better coordinate workforce development programs with economic development partners and programs;
- d. Strengthen linkages between the one-stop delivery system and unemployment insurance programs.

This may include the implementation of incumbent worker training programs, on-the-job training programs, work-based learning programs, apprenticeship models, customized training programs, or utilization of effective business intermediaries and other business services and strategies that support the local board's strategy in 3.1. [WIOA Sec. 108(b)(4)(A&B)]

DEFICIENT

REQUESTED REVISION #1:

- The answer does not describe how the local board will strengthen linkages between the one-stop delivery system and unemployment insurance programs. It merely acknowledges UI as a key partner for rapid response. The answer should also discuss RESEA, which is a UI grant.
- The answer does not discuss the local board's plans to coordinate business services with core partner programs, especially DVR and the answer is vague on how business services are delivered. (Who is responsible? All staff? Are employers assigned a specific staff person? How often and how are these employers selected, are there return visits?)

REQUESTED REVISION #2:

- Even if it is describe earlier in the plan, please include it here. Identify and describe the strategies and services that will be used to: Strengthen linkages between the one-stop delivery system and unemployment insurance programs.
- Address coordination and see 2nd revision question above.

The Board will include UI among core partner agencies when establishing coordination of services as described earlier in the Local Plan. This will include RESEA, which assists unemployment insurance claimants in returning to work quickly, provides group sessions on labor market information and job search requirements, provides individualized services on career counseling and assessment of career goals, and assists with job search, referral and placement. Also, included in an earlier section of the Local Plan is a strategy that will link UI claimants through the workforce development system in an effort to transition them into related employment.

Core partners, including DVR, will work to ensure meaningful work opportunities for jobseekers. Core partners will engage effectively with employers by building a bridge between employers and jobseekers. The career pathways system will create a whole range of things employers can do to support the workforce development system and get jobseekers ready for work, with the ultimate goal being employment. Involving in-demand industries in sector partnerships will help employers figure out what it is they can do to move jobseekers along a ladder of developing the skills and networks they need to be successful employees. The Board's employer engagement model will embed a core set of professional and life skills that will forge strong partnerships between core partners and employers, and incorporate high-touch mentoring support, wraparound services, and work-based experiential learning, such as on-the-job, customized and incumbent worker training.

3.13 Does the local board currently leverage or have oversight of funding outside of WIOA Title I funding or county general funds to support the local workforce development system? Briefly describe the funding and how it will impact the local system. If the local board does not currently have oversight of additional funding, does it have future plans to pursue them?

DEFICIENT

REQUESTED REVISION #1:

- The response did not specifically address the Board's oversight of non-WIOA funds.
- Please confirm the information in this section. Goodwill has SEE and First to Work VR and First to Work, are WDD and Goodwill doing FTW, if so, why not mention both?
- Are there plans to pursue additional funding?

REQUESTED REVISION #2:

- This answer should probably replace the first response.
- First to Work is not a VR program, it is a Benefit Employment and Support Services Division (BESSD) program.

The Board does not have oversight of non-WIOA funds. OWDB Administration is currently understaffed. Unless more staff is hired, there are no plans to pursue additional funding.

Section 4: Program Design and Evaluation

4.1 Describe how the local board, working with the entities carrying out core programs, will coordinate activities and resources to provide high quality; customer-centered services and expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. [WIOA Sec. 108(b)(3)]

DEFICIENT

REQUESTED REVISION #1:

- For each group, indicate new initiatives that:
 - Expanded or will increase access to employment, training, education, and supportive services.
 - Improved or will advance the quality of customer-centered services.
 - Facilitate the development of career pathways and co-enrollment, as appropriate, in core programs.
 - Improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and stackable)
- No, the Coordinated Service Delivery model is not fully described in 3.1.
- Saying that the board will coordinate with a partner does not fulfill the requirement of describing how that will be done. The answer mentions other partner programs, but does not focus on how the board will provide workforce activities with these partners. It appears to be a list of what others are doing in the local area without examining the board's role with these partners.

REQUESTED REVISION #2:

- Did not address the last bullet point on the requested revision.
- Coordination of activities and resources from core programs requires full understanding of all the involved programs and services. Intense partner collaboration will be necessary to develop coordinated service delivery. Provide a timeline for development of a coordinated plan with involved partners.
- The "coordinated service delivery model" is a set of bullet points, it still does not answer how the Board will coordinate.

The development of a Local Plan that established an improved local workforce development system evolves over time. The Board articulates in the Local Plan strategies to provide outreach to engage target populations in order to provide them with access to workforce development services. The purpose of workforce development services is specifically to increase their access to employment by providing the education, training and support services they need to acquire the skills, knowledge and credentials necessary for employment. By targeting these populations, each will achieve the bulleted items above.

The elements of the Coordinated Service Delivery model are defined in section 3.1. Once the state develops and disseminates the common intake/assessment process, core partners will come together to apply it in the context of coordinated service delivery. The key pieces of this process is to provide all participants of the workforce development system an individualized, customized services plan, which includes a robust referral network with comprehensive support services.

The first step in developing strategic partnerships is to establish the partnership, which is described in the Local Plan. Once these partnerships are developed, a more articulated plan for how they will play out within the workforce development system can be created.

4.2 Describe how the local board will facilitate the development of career pathways, consistent with the Career Pathways Definition. [WIOA Sec. 108(b)(3)]

DEFICIENT

REQUESTED REVISION #1:

- The response did not describe how the local board will support the development of career pathways for their local area.
- The plan does not differentiate Adult Education from Postsecondary. Recommend an underlined subheading for Adult Education. Waipahu CSA also provides adult education career pathways initiatives. Recommend this be included since this is an island-wide plan.

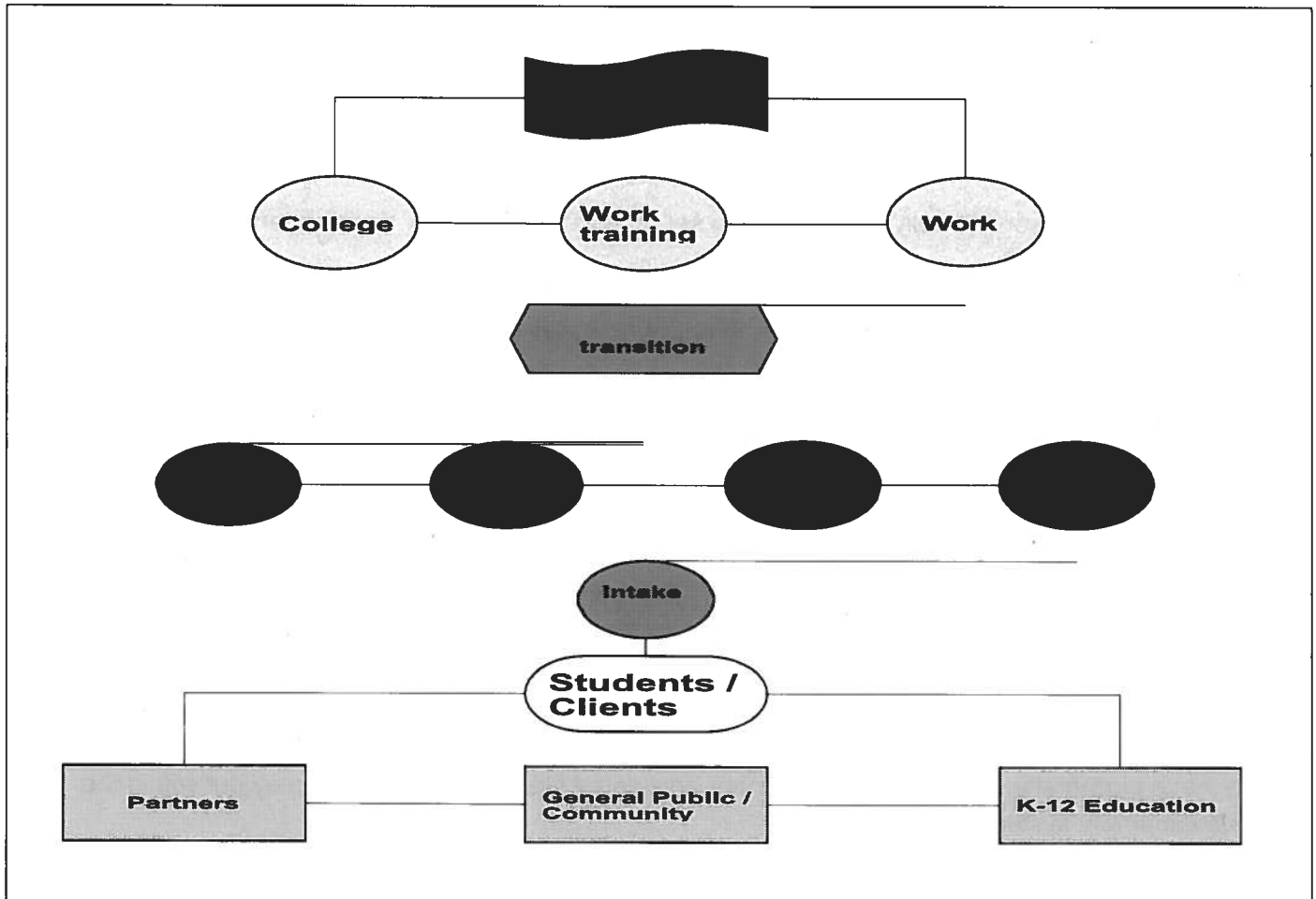
REQUESTED REVISION #2:

- None

The description in the Local Plan is the statewide career pathways model. The Board will support the implementation of this model in the City and County of Honolulu by requiring core partners to utilize this model in their delivery of services, but driven by the sector priorities identified for the City and County of Honolulu.

The recommended headings will be added to the Local Plan, and Waipahu's Career Pathways model will be added:

Waipahu Community School for Adults College & Career Pathway Model



4.3 Describe how the county board will utilize co-enrollment, as appropriate, in core programs and improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and stackable) to maximize efficiencies and use of resources. [WIOA Sec. 108(b)(3)]

DEFICIENT

REQUESTED REVISION #1:

- The local plan failed to address the question. How will the county board utilize co-enrollment, as appropriate, to improve access to activities leading to a recognized postsecondary credential to maximize efficiencies and use of resources. Also, does not discuss portable and stackable credentials.
- Indicate when and how often the local board, through its OWDB Executive Director is working with the core partners to facilitate:
 - Expanded access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment.
 - Development of career pathways and co-enrollment in core programs to improve access to activities leading to a recognized postsecondary credential including an industry-recognized certificate or certification.
- Specify how this will produce efficiencies and improve use of resources.
- Where will these arrangements be incorporated e.g. Memorandum of Understanding, Operations Manual, Participant handbooks?

REQUESTED REVISION #2:

- It is acknowledged that continued work with core partners is needed to fully understand each partner's program. Provide a timeline and plan to engage in partner coordination for co-enrollment.

Co-enrollment is part of the career pathways model that is described by the state and will be implemented locally. This will allow for participants of the workforce development system to receive education, job training and support services simultaneously. Specifically, it will allow participants to be enrolled in adult education concurrently with postsecondary program. In addition, Integrated Education and Training models, which will be a requirement of the Adult Education and Family Literacy Act (AEFLA), will further allow for co-enrollment strategies. It is a requirement that IET models include the attainment of an industry-recognized credential, and illustrate to the participant the notion of stackable certificates (i.e., how they advance along a career path as they obtain credentials).

The Board will continue to work with core partners (as described earlier in the Local Plan) to improve coordination of services, expand access to services, facilitate the implementation of career pathways. As the Board and core partners convene to review progress, necessary improvements to the system will be articulated in the partner MOUs, which will be reviewed annually.

- 4.5** Describe one-stop delivery system in the local area, consistent with the One-Stop Center Definitions including:
- a. How the county board will ensure the continuous improvement of eligible providers of services through the system and ensure that such providers meet the employment needs of local employers, and workers and jobseekers. [WIOA Sec. 108(b)(6)(A)]

DEFICIENT

REQUESTED REVISION #1:

- The response seems to indicate that one RFP will be issued for the one-stop operator and service provider for Adult & DW at a later date while the development of the one-stop is formulated. However, WIOA requires that procured one-stop operators be in place by July 1, 2017.
- Priority of use of adult funds will be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. If this statement refers to funding provided by the DOL, it is incorrect. Priority for all DOL funds is to provide services for veterans.
- The answer does not describe the requirements/standards of the One-Stop that the board will require. Will the board really wait for 18 months to build the system and not insist on specific standards for the one stops from the beginning? For instance, disability access, training of staff, technology, direct access to programs, hours of operation, how customers will be served, the condition of the One-Stop, signage requirements. The answer does not include partner feedback, nor partner evaluations.
- It is not enough to describe services provides at the American Job Centers. This response is inadequate because it does not delineate how the employment needs of local employers, workers and jobseekers will be determined and how assessments will be made on the extent to which service providers adjust to meet them.

REQUESTED REVISION #2:

- A one-stop delivery system for the City and County of Honolulu needs to be designed and developed by the local board. The one-stop operator will implement the board's directives. Provide a timeline/plan for the development of Oahu's one-stop system design and implementation. To allow for "at least 18 months for the building of the American Job Center..." is insufficient without a specific plan.
- The requirements must be included here.
- Specify the requirements/standards that is articulated in the current RFP solicitation for a new One-Stop provider.

The Board is currently in the process of issuing an RFP solicitation for a new one-stop provider to be in place by July 1, 2017.

The priority of funds statement was removed from the Local Plan.

The Board will articulate requirements in the RFP solicitation for a new one-stop provider.

An earlier section of the Local Plan describes employer engagement strategies as an attempt to serve employers. The description of the Coordinated Service Delivery Model describes how services will be provided to jobseekers. The response in this section, as stated, described how the one-stop will operate to serve employers and jobseekers.

b. Describe how the local board will facilitate access to services provided through the one-stop delivery system, including in remote areas, through the use of technology, and through other means.
[WIOA Sec. 108(b)(6)(B)]

DEFICIENT

REQUESTED REVISION #1:

- The response stated that limited services will be provided in Waianae, community college campuses and electronic access points; however, the sentence to list the access points was not completed.
- This should be numbered 4.5b. Description is sketchy, not fully developed, describes the current status, does not appear to be an improvement over the current system, with customers confused over what services are available and where, "limited services" is not an acceptable description.
- What about the Wagner-Peyser office at Punchbowl Street?

REQUESTED REVISION #2:

- Limited services provided at satellite locations such as in Waianae is not acceptable under WIOA. If Waianae will be an affiliated one-stop, what programs/partners will be available there?
- Knowing that Wagner-Peyser is not allowed to be a stand-alone office, what is the plan of action to address the Punchbowl Street office?
- There was no listing of the access points for clients in the Waianae are or community college campuses.

The labeling in the Local Plan has been corrected. The formatted numbering inadvertently became altered during the development of the Plan.

The Board and the One-Stop System Operator will adhere to these:

§ 463.315 Can a stand-alone Wagner-Peyser Act Employment Service office be designated as an affiliated one-stop site?

(a) Separate stand-alone Wagner-Peyser Act Employment Service offices are not permitted under WIOA, as also described in 20 CFR 652.202.

(b) If Wagner-Peyser Act employment services are provided at an affiliated site, there must be at least one or more other partners in the affiliated site with a physical presence of combined staff more than 50 percent of the time the center is open. Additionally, the other partner must not be the partner administering local veterans' employment representatives, disabled veterans' outreach program specialists, or unemployment compensation programs. If Wagner-Peyser Act employment services and any of these 3 programs are provided at an affiliated site, an additional partner or partners must have a presence of combined staff in the center more than 50 percent of the time the center is open.

§ 463.320 Are there any requirements for networks of eligible one-stop partners or specialized centers?

Any network of one-stop partners or specialized centers, as described in § 463.300(d)(3), must be connected to the comprehensive one-stop center and any appropriate affiliate one-stop centers, for example, by having processes in place to make referrals to these centers and the partner programs located in them. Wagner-

Peyser Act employment services cannot stand alone in a specialized center. Just as described in § 463.315 for an affiliated site, a specialized center must include other programs besides Wagner-Peyser Act employment services, local veterans' employment representatives, disabled veterans' outreach program specialists, and unemployment compensation.

- c. Describe how entities within the one-stop delivery system, including one-stop operators and the one-stop partners, will comply with WIOA section 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities. [WIOA Sec. 108(b)(6)(C)]

DEFICIENT

REQUESTED REVISION #1:

- This should be numbered 4.5c, not 4.7. Simply saying that all AJCs will comply with ADA checklist is not sufficient. How will this be accomplished for facilities, programs, and services?
- Section labeling needs correcting.
- Lacks details as to what entities, programs, services in One-Stops.

REQUESTED REVISION #2:

- Did not address requested revision.
- If the City and County of Honolulu does not have an ADA staff person, a plan should be developed to complete the ADA checklist for each one-stop location. If needed, seek training from the Hawaii Disability Rights Center.
- The question was misinterpreted, the compliance is for the One-Stop system, not other businesses. Please rewrite.

The Board through its RFP process will ensure the one-stop delivery system, including one-stop operators and the one-stop partners, comply with WIOA, Section 188 and applicable provisions of the ADA of 1990.

Oahu does not have an ADA person who monitors or visits business to give suggestions on if they are meeting ADA requirements or not. Business can pay a private consultant to do this type of work or The Hawaii Disability Rights Center is a non profit that can give training and guidance on ADA compliance. Their website is: www.hawaiidisabilityrights.org DCAB at the State only reviews plans for City buildings, but they have no way of enforcing this.

d. Describe the roles and resource contributions of the one-stop partners and if memoranda of understanding or resource sharing agreements are used, provide a summary of those agreements. [WIOA Sec. 108(b)(6)(D)]

DEFICIENT

REQUESTED REVISION #1:

- Provide a timeline for development of the MOU.
- The local plan does not include a description of the roles and resource contributions of the one-stop partners. The local plan does state that the Board will have an MOU with each core and required partner which will include a description of the roles and resource contributions of the one-stop partners.
- Section labeling needs correcting.
- Lacks details as to what entities, programs, services in One-Stops. Dependent on the identifying partners.

REQUESTED REVISION #2:

- Did not address the requested revision.
- If the Board cannot answer this question at this time, provide a timeline for developing it.
- The local plan does not include a description of the roles and resource contributions of the One-Stop partners.

The MOU will be developed as part of the negotiation process with a new one-stop provider Spring 2017. The Board will ensure that core partners as well as other services providers include in the MOU how their services will directly support the vision and goals of the City and County of Honolulu Local Plan as well as resources contributions and a link to negotiated performance targets.

The description of the one-stop delivery system is how it currently operates, along with potential considerations for the future. The Board will determine the criteria for selecting a new one-stop provider through the RFP solicitation. A selection for design of a one-stop system will be based on available resources.

- e. Describe how one-stop centers are implementing and transitioning to an integrated technology-enabled intake and case management information system for core programs and programs carried out by one-stop partners. [WIOA Sec. 108(b)(21)]

DEFICIENT

REQUESTED REVISION #1:

- Should be 4.5e, not 4.9. What is the local board's role aside from utilizing the system? How will it facilitate implementation with partners?
- Case management is omitted.
- Section labeling needs correcting.

REQUESTED REVISION #2:

- Does the Board have any other responsibilities other than "support?" For instance, issuing policies and procedures?
- A statewide common intake, assessment and data system that meets the requirements of WIOA and is affordable to all partners has yet to be identified. The response does not specify how the Board will support any data system? Financial support? Staffing support?

The Board's role is to support statewide common intake and assessment system, and through MOUs with the core and required partners, there will be an agreement that all partners in the American Job Center (AJC) system/network will utilize this intake and assessment system to coordinate their referrals and services.

Currently, WIOA Title I & III are using the Hirenet case management system where they enter participant information, activities and services. Through MOUs, the other required and core partners will be given access to view participant's records to avoid duplication of services with the understanding that confidentiality requirements will be adhered.

4.6 Describe the process and criteria for issuing individual training accounts. [WIOA Sec. 108(b)(19)]

DEFICIENT

REQUESTED REVISION #1:

- Response did not provide criteria for issuing ITAs including any procedure for exceeding funding caps, if allowed.
- Page 59, Section 4.6, Paragraph 3 has an unfinished sentence.
- Section labeling needs correcting.

REQUESTED REVISION #2:

- As stated, "The board has established a lifetime amount or cap for each participant." What is that lifetime amount or cap established by the board?
- Has the Board established the above as a policy?

The board has established a lifetime amount or cap for each participant. WIOA would pay the lowest cost for the same type of training program offered by providers. The client would be able to enroll in the training program, with the provider of his choice, but if the program and provider of his choice charges more than the lowest cost for the same type of training the client would be responsible for paying the difference between the lowest cost and what is charged by the customer's provider. In the past, the board has successfully worked with providers to adjust their training costs or offer scholarships to reduce the burden on clients.

ITA procedures, to cover costs of the following items provided by approved training providers: tuition and fees for training, textbooks, supplies, uniforms, and necessary training materials or testing fees for certification, and licensing examinations, tuition and fees for training are covered under the ITA. Textbooks, supplies, uniforms and necessary training materials as well as testing fees for certification and licensing examinations are covered under support services. Payment procedures are the same for ITAs and support services. Payments are made to providers and vendors who invoice the City. Payment must be authorized or pre-approved by the OWL Employment Consultant, Supervisor and Center Manager, prior to receiving the goods or services. In exceptional cases where clients advance the payment for tuition or support service item out of their own pocket, they may request for reimbursement only if pre-approval has been given.

Prior to establishing a training account for an individual client, a counselor will have to determined that the participant is in need of training, assessed the individual's interests, abilities, and need for supportive services, established an appropriate training plan, worked with that participant to estimate the full cost of tuition and other training expenses needed to complete the plan successfully calculated the amount of total resources available from WIOA and other sources, provided guidance and training in evaluating training provider data in order to select wisely from the list of eligible training providers. The participant chooses which program to attend and what additional necessary training expense to charge again the ITA. However, all charges must first be approved as an allowable training cost by the One-Stop Center intensive service staff, usually the participant's counselor. In the case of tuition, the approving staff must also certify that the training is consistent with the training plan based on the participant's career goals and abilities. Tuition payments may only be made for programs that appear on the state list of approved trainers. Purchasers of other training materials will only be approved if the price is reasonable for the items. Payments may be made directly to the vendor or reimbursed to the participant after submitting proof of payment. The maximum amount available through an ITA will vary among participants and will be based on anticipated training costs. If a participant desires to attend a program which cost exceeds the available ITA balance, that participant must demonstrate his/her ability to pay the excess cost prior to enrollment in the program.

4.7 If training contracts are used, how will the use of such contracts be coordinated with individual training accounts; and how will the local board ensure informed customer choice in the selection of training programs, regardless of how the training services are to be provided. [WIOA Sec. 108(b)(19)]

DEFICIENT

REQUESTED REVISION #1:

- Indicate whether training contracts are used. If yes, explain how these contracts are coordinated with individual training accounts and how the local is ensured that customer choice is informed.
- Section labeling needs correcting.

REQUESTED REVISION #2:

- 20 CFR Part 680.320 specifies conditions when training services besides ITAs may be provided. Are such training contracts being used and if so, how is it coordinated with ITAs?
- Cannot tell whether training contracts are used. It can be assumed from the response that contracts are not being used. Need to clarify.

The One Stop operator will coordinate all resources to provide the client with all possible funding and opportunities to make sure that their career goals and training have been met. At the American Job Center, the clients are encouraged to research and use the ETP provider list (Kumu'ao website) to assist them in making their career/training choice. If a client's training needs exceed the WIOA ITA cap, the AJC counselors assist the clients in seeking other resources or other agencies that can possibly assist them further with their training needs. If other agencies' services fit the client's training plan better financially or include services such as job coaching, bus passes, assistive technology, medical needs etc. then counselors will determine the provider that may best assist and provide all their trainings needs.

4.8 Describe the process utilized by the local board to ensure that training provided is linked to in-demand industry sectors or occupations in the local area, or in another area to which a participant is willing to relocate. [WIOA Sec. 134(c)(3)(G)(iii)]

DEFICIENT

REQUESTED REVISION #1:

- Response did not describe how the local board will ensure that training is linked to in-demand occupations.
- The plan incorrectly refers to “Employer” instead of “Eligible” Training Provider lists, which should consist of locally in-demand occupations. The response fails to discuss provisions for access to training for demand occupations in another area to which a participant is willing to relocate.
- Section labeling needs correcting.

REQUESTED REVISION #2:

- How will it be linked to in-demand industries?
- The response fails to discuss provisions for access to training for demand occupations in another area to which a participant is willing to relocate.

The Board will ensure that training is linked to in-demand occupations by establishing sector partnerships in in-demand industries and requiring integrated education and training provided through the career pathways model aligns with sector partnership areas.

“Employer” was changed to “Eligible.” The Board will encourage training providers, particularly those in in-demand industries, in the City and County of Honolulu to apply for the Eligible Training Provider Program (ETP) and be included on the ETP List. The OWDB staff will review these applications and verify information by following the ETPL statewide policy and local procedures. Once the registration is approved, training providers will be able to include specific training programs to be listed on the ETP List.

4.9 Describe how the local board will coordinate workforce investment activities in the local area with rapid response activities carried out in the local area (as described in section 134(a)(2) A). [WIOA Sec. 108(b)(8)]

DEFICIENT

REQUESTED REVISION #1:

- Generalized answer, more specific information for C&C of Honolulu should be included, for instance, the answer mentions non-profit groups, who are they? Who coordinates the local area response? "The C&C of Honolulu will provide immediate assistance" can more specifics be provided?
- Section labeling needs correcting.

REQUESTED REVISION #2:

- Please incorporate more details into response.

The labeling in the Local Plan has been corrected. The formatted numbering inadvertently became altered during the development of the Plan.

Rapid Response is a stateside strategy designed to respond to business layoffs and closings by coordinating services and providing immediate aid to affected business and their workers. When Rapid Response is necessary in the City and County of Honolulu, local workforce staff will work with state staff as a team to assist employers and employee representatives to maximize public and private resources in order to minimize disruptions associated with job loss. Rapid Response in the City and County of Honolulu will provide customized services on-site at an affected business, accommodate work schedules, and assist employers and employees through employment transition. Rapid Response in the City and County of Honolulu will be carried out by state and local workforce development agencies in partnership with the local American Job Center where many services will be offered, from resume and interview workshops, career counseling, and job search to re- skilling and job training.

Section 5: Compliance

5.1 Attach as *Attachment A*, the document signed by the Chief Local Elected Official (Mayor) designating the local workforce development board as the local (county) WIOA administrative entity.

The attachment is missing

REQUESTED REVISION #1:

- The letter approved Oahu's initial designation as a Local Workforce Development area, not a local WIOA administrative entity.

REQUESTED REVISION #2:

- Need to supply the letter.
- Letter designating OWDB as the WIOA administrative entity should be received prior to contract execution for the PY17 funds.
- Timeline?

5.2 Describe the competitive process and criteria (such as targeted services, leverage of funds, etc.) to be used to award sub-grants and contracts for WIOA Title I Adult, Dislocated Worker, and Youth services; provide the names of contracted organizations, and the duration of each contract. [WIOA Sec. 108(b)(16)]

DEFICIENT

REQUESTED REVISION #1:

- Methods for procuring the Title I Adult, DW and Youth providers are missing and need to be inserted. It should be stated that contracts are subject to the availability of funds and satisfactory performance.

REQUESTED REVISION #2:

- Since an RFP will be issued at a later date for the Adult and DW service provider, provide the name of the currently contracted organization and the duration of the contract.

The methods and timeframe for procuring the Title I Adult and Dislocated Worker providers will be placed on a future agenda for action when the OWDB is certified and a Finance/RFP Committee is created. The decision to procure the One-Stop Operator separately from the program providers has been widely supported by the core and mandatory partners and has been expressed in several letters of support sent to the board.

5.5 Provide the policy and process for nomination and appointment of board members demonstrating compliance with WDC Policy/WIOA Bulletin No.04-15.

DEFICIENT

REQUESTED REVISION #1:

- The local board needs its own policy, mostly likely in its bylaws. It cannot use the state policy as the state requirements are different, and the board is appointed by the Governor, the local board is appointed by the Mayor, the state board cannot have one member represent more than one sector. The board should not cite HRS for selection of its chair.
- The City's policy and process for nomination and appointment of board members is missing and needs to be inserted.

REQUESTED REVISION #2:

- Timeline?

These policies will placed on a future agenda of the certified OWDB.

5.8 Identify the entity responsible for the disbursement of grant funds. [WIOA Sec. 108(b)(15)]

DEFICIENT

REQUESTED REVISION #1:

- Entity responsible for disbursement of funds was not identified.

REQUESTED REVISION #2:

- Name the department/agency within the City and County of Honolulu that has fiscal responsibility for the WIOA grant including disbursement of funds.
- The entity responsible for the disbursement of grant funds is...?

Governor receives funds from US DOL/DOE through DLIR/WDC

Governor designates Local Areas and through contractual arrangement funds the Local Areas: For Hawaii the Local Areas are Hawaii County, Maui County, Kauai County and the City and County of Honolulu.

Each County is considered the "Grant Recipient" and the Mayor of each County is designated as the Chief Local Elected Official (CLEO)

City and County of Honolulu:

Funds are through the Mayor's office and the Director of Budget and Fiscal Services (BFS) is designated as the official signature on grant related documents. The day to day management of the funds is done through the Oahu Workforce Development Board (OWDB) which is administratively attached to the Department of Community Services (DCS).

The Honolulu CLEO appoints the members of the Local Board (OWDB) per guidance from the State based on the WIOA legislation. Staffing of the board is provided by City and County of Honolulu funded through WIOA. Supervision of the staff is provided by the Deputy Director of DCS, The Bylaws and an MOU between the board and the CLEO, along with policies established set forth the roles of the CLEO, OWDB,

DCS and BFS. In addition, procedures describe the separation of roles and duties in the day to day operations particularly as it pertains to fiscal and budgeting issues and contractual management. To further ensure a separation of roles, the OWDB has a Deputy Corporation Counsel Assigned that is different from the Deputy Corporate Counsel representing the DCS.

The separation of duties and functions are essential because the DCS is a direct service provider and currently provides services for WIA (predecessor of the WIOA). DCS (Work Hawaii specifically) could decide to compete for future WIOA funds and the City and County of Honolulu may opt to exercise their option to directly provide direct services and there needs to be a separation so that the OWDB can oversee the funds and performance measures required of the WIOA funds.

The board will consider including these negotiated measures.

5.13

(a) Attach the following to the Local Board Plan:

(1) The Local Board's Bylaws as *Attachment F*

(2) The Local Board's Conflict of Interest Policy as *Attachment G*

(b) State any concerns the local board has with ensuring the compliance components listed below are in place prior to October 31, 2016. Copies of documents are not required at this time but may be requested during monitoring.

- Administration of funds
- Agreement between all counties and other local governments, if applicable, establishing the consortium of local elected officials
- Agreement between the Local Elected Officials and the Workforce Development Board
- Code of Conduct
- Approved Budget
- Memorandum of Understanding and/or Resource Sharing Agreements, as applicable
- Required policies on the following topics
 - Financial Management including cost allocation plan, internal controls, cash management, receipts of goods, cost reimbursement, inventory and equipment, program income, travel reimbursement, audit requirements and resolution, annual report, property management, debt collection, procurement, allowable costs
 - Program Management including equal opportunity for customers, supportive services, needs related payments, file management, eligibility, self-sufficiency criteria, individual training accounts, layoff assistance, priority of services, grievance for eligible training providers list, transitional jobs, stipends, training verification/refunds
 - Risk Management including records retention and public access, public records requests, monitoring, grievance, incident, disaster recovery plan
 - Board Policies including board appointment, board resolutions

ATTACHMENT G:

The attachment does not satisfy the request.

REQUESTED REVISION #1:

- The board needs a conflict of interest policy that includes its contractors/service providers who are not city employees, and for members of the board who are not appointed by the Mayor and not elected.

REQUESTED REVISION #2:

- More definite timeline will be helpful as this has a high priority.

Here is the Board's Conflict of Interest Policy: [DCS WIOA Conflict of Interest Policy.pdf](#)

The City's Ethics Commissioner has indicated that the Board and Commissioners are considered City Officers, so they are already compliant pursuant to the City's ethics rules and they all participate in the City's ethics training. There are no members of the Board who are not appointed by the mayor, so all members are appointed and considered "City Officers". The Board will put on a future agenda the action item to consider working with Corporation Counsel and the Ethics Commission to create a conflict of interest policy for contractors/services providers who are not City employees.

5.14 Describe how the Local Board complies with the requirements of Hawaii's Sunshine Law on open meetings and meeting records (HRS §92) and WIOA Sec. 107(e):

- (a) Who is notified of meetings and how are they notified?
- (b) Where are meeting notices (agenda) posted?
- (c) Where are the meeting minutes posted? How does the public access meeting minutes?
- (d) Attach as *Attachment H* the local board agenda and minutes for the last two fiscal years (2014 & 2015).
- (e) How will information regarding the designation and certification of one-stop operators, and the award of grants or contracts to eligible providers of youth workforce investment activities be available to the public?

DEFICIENT

REQUESTED REVISION #1:

- Posting of agendas at the meeting site on the day of the meeting is not sufficient. Response states that as of 1/1/16, approved minutes are posted on the OWDB website, however, the last meeting agenda and minutes submitted was for 7/8/14. No agenda and meeting minutes for 2015.

REQUESTED REVISION #2:

- The decision to exercise the option to directly provide youth services is not being question here. How it was done and whether it followed the board's policy on the awarding of contracts and changing the method of procurement and whether the board should have ratified the decision is the question.

ATTACHMENT H:

The attachment does not satisfy the request.

REQUESTED REVISION #1:

- Shouldn't there be some documentation that a meeting was called but quorum wasn't reached and that the chair deferred voting items, but continued with non-voting items?
- Although the "City and County of Honolulu as the grant recipient, has opted to exercise its option to directly provide youth services," the Board should have documented the reasons for not procuring it and there should be an acknowledgement by a committee of the board or the full board that it has approved such sourcing (e.g. approved board minutes or a signed letter from the Board Chair.)

REQUESTED REVISION #2:

- None

When the responses from board members indicate that quorum will not be reached, meetings are canceled completely. Under the Procurement and Service Provider Selection Section 681.400 of the WIOA Final Rule, OWDB has the option to provide directly some or all of the youth workforce investment activities. In fact, Local WDBs are encouraged to continue to award contracts to youth service providers when local areas have experienced and effective youth service providers. In addition, if an area has a YouthBuild award, it is considered a required partner. Not only is the Youth Services Center of the City and County of Honolulu a high performing center, it also has Hawaii's only

YouthBuild program. Following this guidance, OWDB is continuing the contract with the current Youth service provider and not competitively procuring a new provider. If the WDC is requiring a letter or approved board minutes, the board will put this on a future agenda to take action when it is officially certified.