



CAPE AND ISLANDS WORKFORCE BOARD

MassHire Cape & Islands Workforce Board WIOA Local 4 Year Plan Guidance FY26-29



Introduction

In accordance with The Workforce Innovation and Opportunity Act (WIOA) Sec. 108, each local board is required to develop and submit to the Governor a 4-year local plan, in partnership with the chief elected official (CEO). The local plan must support the strategies described in the WIOA State Plan in accordance with section 102(b)(1)(E) and be otherwise consistent with the State Plan. Massachusetts WIOA State Plan highlights the Healey-Driscoll Administration's understanding of how critical the state's workforce is and will be to fuel economic prosperity in Massachusetts.

This Local 4-Year Plan aligns and integrates service delivery strategies and resources among local WIOA and other partners and aligns with the four focus areas: Attract and Retain Talent, Talent Development, Improve Workforce System Infrastructure, and Lead by Example. This alignment is critical to ensure consistency, maximize impact, and leverage resources across the workforce ecosystem to improve outcomes for jobseekers and employers.

Note: Throughout this plan, the MassHire Cape and Islands Workforce Board will be referred to as CIWB, and the MassHire Cape and Islands Career Center will be referred to as MassHire CICC.

Strategic Planning Elements

(1) A regional (local) analysis of: I. Economic conditions including existing and emerging in-demand industry sectors and occupations; and II. Employment needs of businesses in existing and emerging in-demand industry sectors and occupations. III. As appropriate, your local area may use an existing analysis that is a timely current description of the regional economy to meet the requirements of this section.

The CIWB Regional Blueprint identifies the priority industries and occupations critical to the region's economic success. These sectors reflect the unique character of the Cape and Islands and are essential to its long-term growth and sustainability. Regional prosperity is closely tied to improvements in infrastructure and services, the continued strength of the tourism industry, and the creation of accessible career pathways, especially within the blue economy.

The following sectors are identified as most vital to the regional economy:¹

- Health Care and Social Assistance (NAICS 62)
- Construction (NAICS 23)
- Government (NAICS 90)
- Technology
 - Professional, Scientific, and Technical Services (NAICS 54)
- Hospitality/Tourism
 - Accommodation and Food Services (NAICS 72)

The *blue economy* intersects each of these industries, serving as the backbone of the Cape and Islands. This sector underscores the region's deep connection to water and the need for sustainable, ocean-centered economic development.

Healthcare and Social Assistance: Healthcare is a priority sector due to the aging population and employer-reported workforce shortages, especially in clinical roles. With over 132,000 residents aged 55 and older, the demand for health services continues to grow. Key occupations include Medical Assistants,

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Home Health Aides, and Certified Nursing Assistants (CNAs), particularly in long-term care and in-home settings.

Construction: This sector offers sustainable wages and well-defined career pathways. Regional growth, housing development, and infrastructure improvements contribute to consistent demand across construction trades.

Technology: Technology roles span all industries. Local high schools are building strong pipelines in STEM and technical education, responding to employers' need for a digitally skilled workforce. Professional, scientific, and technical services play a vital role in driving regional innovation.

Hospitality/Tourism: As a premier destination, the Cape and Islands economy depends on a thriving tourism sector. This includes hotels, restaurants, cultural institutions, and recreational activities that support both seasonal and year-round employment.

Each priority sector has been selected based on a combination of projected growth, workforce demand, and the ability to offer self-sufficiency through meaningful career pathways. Together, these industries form the foundation for a resilient and inclusive regional economy.

Job prospects within the healthcare sector remain strong:²

- Registered Nurses (RNs) earn between \$64,300–\$85,200 annually. Cape Cod Community College, in partnership with UMass Boston, offers a flexible RN-to-BSN program, allowing working professionals to advance their education while continuing to work.
- Medical Assistants earn between \$37,600–\$45,000, supporting both self-sufficiency and career advancement.
- Licensed Practical Nurses (LPNs) earn between \$59,500–\$64,600. Upper Cape Cod Regional Technical School supports students pursuing nursing careers by encouraging graduates, many of whom already hold a CNA certification, to further their training through its nursing pathway programs.

The construction industry remains vital to the region's infrastructure and economic growth. It is also highly diversified, with the Home Builders & Remodelers Association of Cape Cod (HBRACC) representing more than 325 members, including builders, developers, general contractors, electricians, and designers. With a practical career pathway, it often provides year-round employment and self-sufficient wages, an important consideration in a high-cost region like Cape Cod and the Islands.

Construction wage data in the region includes:³

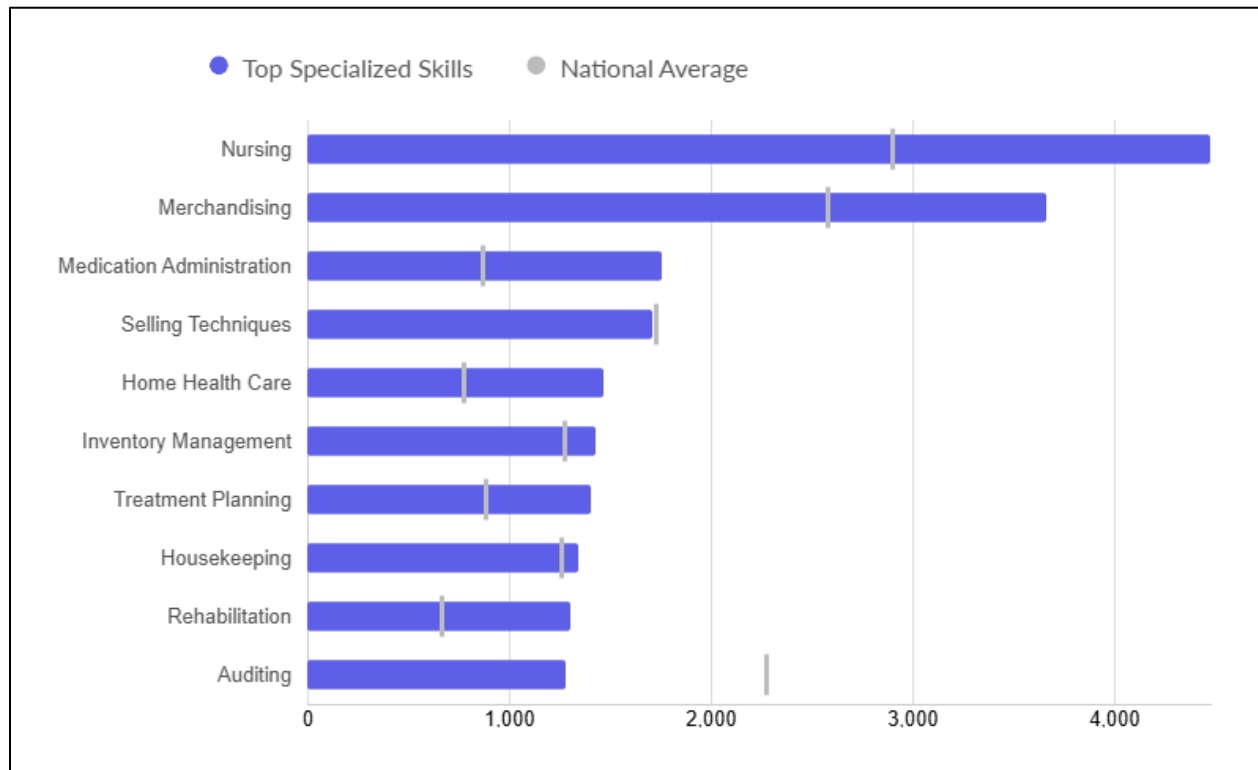
- Electricians: \$46,000–\$79,000
- Carpenters: \$42,000–\$61,000
- HVAC Technicians: \$44,000–\$63,000
- Construction Managers: \$81,000–\$108,000
- Wind Energy Development Managers: \$77,000–\$132,000

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(2) Describe the knowledge and skills needed to meet the employment needs of businesses in your region, including employment needs in in-demand industry sectors and occupations.

The following graph displays the top ten hard skills sought by employers in the Cape & Islands region. The gray mark indicates the average demand for those skills nation-wide. The Cape and Islands region exceeds the national average in all in-demand skills represented below, besides selling techniques.

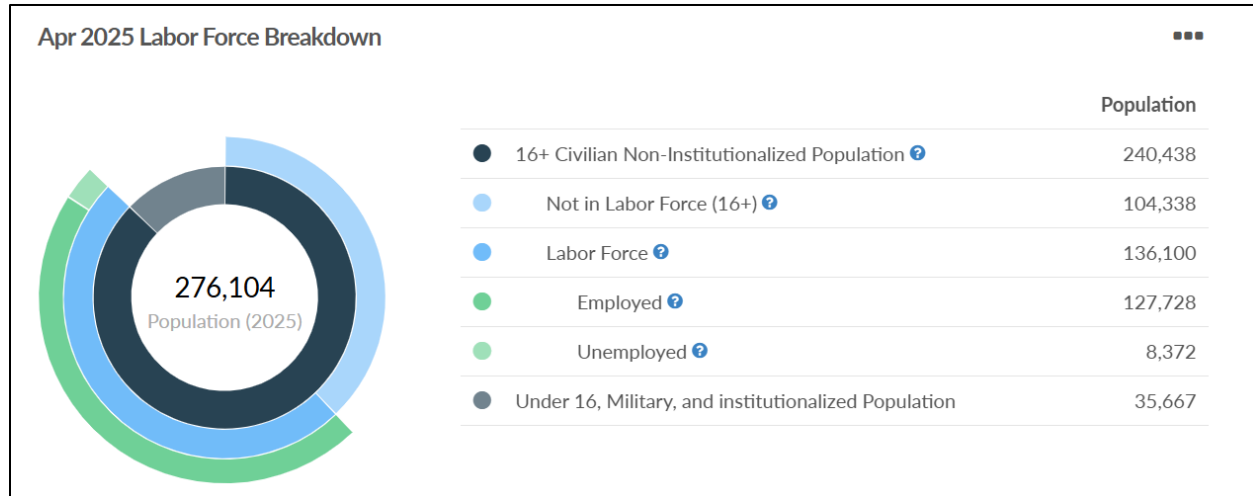


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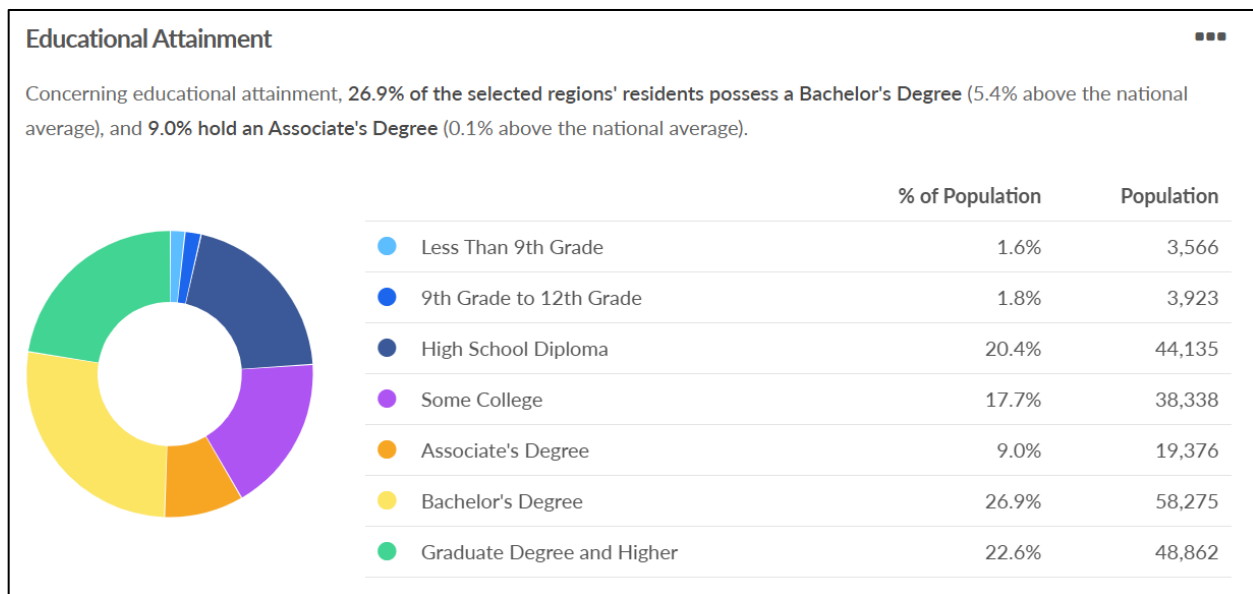
(3) Please provide an analysis of your regional workforce, including current labor force employment and unemployment data, information on labor market trends, and educational and skill levels of the workforce, including individuals with barriers to employment.

The following data gathered from Lightcast is obtained from an economic overview report of the Cape and Islands region. This report is designed to provide a high-level summary of the Cape and Islands economy to show major trends influencing the region. Aside from illustrating an overview of the regional economy, this report includes data related to jobs, demographics, and social metrics.

Here are two examples of graphs from the economic overview report. The first provides a breakdown of the labor force within six different categories and the second provides a breakdown of the population in regard to educational attainment.



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Strengths of the Cape and Islands Workforce Area

- **Strong Regional Collaboration:** Robust partnerships with employers in priority industries, community-based organizations, non-profits, and local legislative leaders support workforce and economic development efforts.
- **Expanded Access to Career Services:** The MassHire CICC continues to provide virtual services, improving accessibility for job seekers and employers in rural areas.
- **Tuition-Free Community College:** Cape Cod Community College now offers free tuition and fees for eligible residents, increasing access to postsecondary education and supporting workforce readiness.
- **Responsive Postsecondary Programming:** Cape Cod Community College's academic departments and the Center for Corporate Training and Professional Development develop curricula aligned with the region's most in-demand occupations.

- Vocational Training Infrastructure: Upper Cape Cod Regional Technical School and Cape Cod Regional Technical High School offer hands-on training and credentialing opportunities for both high school students and adult learners.
- Grant-Funded Expansion: The successful acquisition of additional grant funding has strengthened program capacity and innovation.
- Education System Engagement: Strong collaborative relationships with regional school district superintendents enhance alignment between K-12 education and workforce development goals.

Challenges of the Cape and Islands Workforce Area

- Limited Transportation: Limited transportation options across the region pose a significant barrier to workforce mobility, making commuting difficult – especially for individuals without access to reliable personal vehicles. Public transit remains limited both in reach and in frequency, and geographic isolation further compounds these challenges. The aging Sagamore and Bourne bridges, vital connectors between the region and the rest of the state, present additional concerns.
- Aging Workforce: The region has one of the oldest labor markets in the Commonwealth, a demographic trend that significantly contributes to talent shortages across key industries and limits the long-term expansion of the regional workforce. As experienced workers retire, the pipeline of younger workers is not keeping pace, creating critical gaps in institutional knowledge, skills and capacity. This aging workforce presents both challenges and opportunities – underscoring the need for targeted strategies to attract, train, retain new talent while also supporting older workers who wish to remain engaged in the labor force.
- High Housing Costs: Soaring housing costs – the medium single-family home within the region has dramatically increased in recent years, making homeownership unaffordable for residents and those that work within the region. A family may need to earn more than \$210,000 annually to afford a home – medium household income is significantly lower.
- Lack of Affordable Childcare: The lack of affordable and accessible childcare within the region remains a critical barrier to workforce participation, particularly for working parents and caregivers. Insufficient childcare options – combined with high costs and limited availability – make it difficult for many families to enter, remain in, or advance within the workforce. These challenges are especially acute for low- and moderate-income households, disproportionately affecting women and single-parent families. Addressing this issue is essential to fostering a stable, inclusive, and fully engaged regional workforce.
- Seasonal Economy: Cape Cod’s seasonal economy presents unique workforce challenges, including fluctuations in employment, inconsistent wages and difficulties in retaining year-round talent. Many industries – particularly hospitality, retail and tourism- rely heavily on the summer workforce, which can limit stable employment opportunities and complicates long-term career planning. This cyclical nature also is impacted by housing, transportation, and childcare systems – further impacting workforce participation and regional economic stability. Addressing these challenges requires a multifaceted approach focused on diversifying the economy, expanding off-season employment options, and supporting worker retention strategies.
- Digital Divide: The digital divide remains a significant barrier across Cape Cod, where inconsistent internet access and persistent gaps in digital equity limit residents’ ability to fully participate in virtual learning, workforce training, and remote employment opportunities. These disparities disproportionately impact rural communities, low-income households and underserved

populations, further widening existing economic and educational inequities. Addressing this divide is essential to ensuring equitable access to the tools and resources necessary for career advancement in today's distal economy.

- **Sea Level Rise & Coastal Erosion:** Rising sea levels are a significant threat, causing increased flooding, beach erosion, and infrastructure damage along the coastline.
- **Growing entrepreneurial spirit:** The Cape and Islands region is experiencing a growing entrepreneurial spirit, fueled by creative talent, innovation, and a desire for locally driven solutions. This momentum is reshaping the regional economy – spurring small business growth, diversifying traditional industry sectors such as the creative arts. These emerging ventures contribute to economic vitality and also promote job creation, community investment and long-term resilience.

The CIWB is committed to delivering the highest quality workforce development services and activities, including education and training opportunities throughout the region. To ensure a high quality of education and training the CIWB collaborates with Cape Cod Community College, MassHire CICC, regional employers and community partners to implement workforce training initiatives. The CIWB area ecosystem is comprised of a variety of training initiatives that continue to promote training and education.

Educational Initiatives:

- The *Massachusetts Skills Capital Grant Program* provides funding for the purchase and installation of equipment and related infrastructure improvements necessary to enhance vocational and technical training programs. These investments support the expansion and modernization of career technical education (CTE) programs that align with regional workforce and economic development priorities. Applicants are encouraged to foster collaboration between educational institutions, industry partners, and workforce organizations. Funded programs must offer students hands-on experience in in-demand skill areas and create clear career pathway opportunities. These may include industry-recognized credentials, apprenticeships, and dual enrollment options that lead to certificates, associate degrees, or baccalaureate degrees. Through rigorous instruction and integrated college and career readiness components, the program strengthens both the technical and academic foundation of students.
- The *Career Technical Initiative (CTI)*, a flagship program of the Workforce Skills Cabinet and the Governor, aims to train an additional 20,000 skilled trades workers over the next four years. CTI leverages the capacity of vocational high schools to offer high-quality training for both students and adults, using existing infrastructure to meet labor market demand and close critical skills gaps. By offering expanded training schedules, including after-school, evening, and summer programming, CTI supports increased student enrollment and drives new state investment. It also provides Massachusetts residents with greater access to pathways in the skilled trades, while supporting business growth through the development of a qualified, work-ready talent pipeline.
- *Innovation Career Pathways* are designed to connect students with high-demand industries through specialized coursework and structured, hands-on learning experiences. These grants emphasize employer engagement and the development of partnerships between schools and industry leaders. The goal is to expose students to a wide range of career opportunities and provide them with the technical knowledge and real-world experience needed to make informed decisions about their futures. ICP programs align academic instruction with labor market needs,

helping students graduate high school with industry exposure, foundational skills, and a head start on postsecondary education or workforce entry.

(4) Please describe the MassHire board’s strategic vision to support regional economic growth and economic self-sufficiency. Include goals for preparing an educated and skilled workforce (including youth, UI claimants, and individuals with barriers to employment), and goals relating to the performance accountability measures based on performance indicators described in § 677.155(a)(1).

The CIWB has established the following strategic goals:

- **Expand Career Pathways and Skill Development**
Promote, develop, and expand career pathways that align with the region’s priority industry sectors. This includes supporting stackable credentials, work-based learning opportunities, and skills training to meet regional hiring needs, while also cultivating opportunities in emerging sectors such as clean energy and life sciences.
- **Advance Equity and Access to Employment**
Increase access to employment and training for individuals facing barriers to employment, including people with disabilities, older workers, veterans, low-income adults, individuals with basic skills deficiencies, displaced or experienced workers with outdated skills, and college graduates whose academic credentials do not match current workforce demands.
- **Support Youth Career Readiness**
Provide youth across the region with opportunities to gain relevant skills and industry-recognized credentials that support their entry into career pathways and long-term employment.
- **Career Center Oversight and Performance Tracking**
The CIWB will monitor progress toward these strategic goals on a quarterly basis using WIOA performance measures tracked through MOSES, including:
 - Percentage of participants in unsubsidized employment during the second and fourth quarters after program exit;
 - Median earnings of participants in unsubsidized employment during the second quarter after exit;
 - Percentage of participants who earn a recognized postsecondary credential or high school diploma (or equivalent) during participation or within one year of program exit.

The CIWB is committed to advancing regional workforce development through the following strategic priorities:

- **Address Regional Skill Gaps**
Continue collaborating with stakeholders, employers, and community partners to identify and address skill gaps that impact the region’s economic growth and workforce competitiveness.
- **Lead as a Workforce Development Convener**
Serve as a leader, convener, advocate, and resource for workforce development initiatives across the Cape and Islands, fostering collaboration and innovation.
- **Pursue Targeted Grant Opportunities**
Actively pursue grant funding that supports high-demand industries, with a particular focus on STEM and the blue economy, to expand training, education, and employment opportunities.

- **Strengthen Governance and Internal Capacity**
Invest in the continued development of the CIWB Board, committees, and staff while enhancing engagement with businesses and key stakeholders throughout the region.
- **Ensure Inclusive Access to Career Services**
Promote equitable access to the MassHire Career Center and ensure high-quality services for all job seekers and employers in the region.
- **Expand Business Engagement**
Proactively engage businesses of all sizes—especially those in priority and emerging industries—to raise awareness of career center services and support their workforce needs.

(5) Considering the analysis described above, please describe your strategy to work with the entities that carry out the core programs and workforce system partners to align available resources to achieve the strategic vision and goals described in the question prior.

The Cape and Islands region’s workforce strategy is grounded in collaboration and inclusivity. We remain committed to working closely with our broad network of workforce, economic development, education, and community partners to implement a continuum of strategies that address the needs of all segments of the workforce - from youth and emerging talent to incumbent workers and career changers. As the convener of the WIOA Partners Memorandum of Understanding (MOU), the CIWB is charged with developing and delivering coordinating, high-quality workforce development services that align regional resources, eliminate barriers, and promote equitable access to opportunity. Through this collaborative approach, we aim to strengthen our regional economy and ensure that all residents can thrive in a rapidly evolving labor market.

WIOA secs. 108(b)(2)-(21) Requirements

(1) Identify the following elements of the workforce development system in your area:

a. Please list all programs included in your local workforce system such as Apprenticeship and ESOL.

The CIWB oversees and supports a broad range of workforce development programs and services, including:

- **Core Workforce Programs**
 - Wagner-Peyser Act Services
 - WIOA Title I – Adult, Dislocated Worker, and Youth Programs
 - Veterans
 - WIOA Title II – Adult Education
 - WIOA Title III – Wagner Peyser/Employment Services
 - Veterans Employment Services
 - Reemployment Services and Eligibility Assessment (RESEA)
 - Trade Adjustment Assistance (TAA)
 - Rapid Response Services
 - Unemployment Insurance Assistance
 - Connecting Activities
 - YouthWorks
- **Core Partner Services via Memorandums of Understanding (MOUs)**
 - Department of Transitional Assistance (DTA)
 - Massachusetts Commission for the Blind (MCB)

- Massachusetts Rehabilitation Commission (MRC)
- Senior Community Service Employment Program (SCSEP)
- Additional CIWB Partners:
 - Cape Cod STEM Network
 - Cape Cod Community College
 - Cape and Islands District Attorney's Office
 - Cape Cod Commission

b. How your Board will support the strategies identified in the State Plan/MA Workforce Agenda and work with the entities carrying out core programs and other workforce development programs, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) to support service alignment.

The CIWB supports the strategy outlined in the Massachusetts State Plan by remaining committed to employer-driven, partnership-based solutions. Through the coordination of services across all core and mandatory MassHire Career Center partners, as well as with regional stakeholders, the CIWB works to advance shared workforce goals and address the evolving needs of both job seekers and employers.

As a regional leader, the CIWB will continue to build the capacity of the workforce system by fostering collaboration, driving innovation, and promoting service excellence. The Board will serve as a steward of the statewide workforce vision, engaging funders, businesses, education partners, and community organizations to realize that vision locally.

To support this effort, the CIWB will:

- Conduct labor market analyses and environmental scans to guide planning and programming.
- Validate and refine priority industry sectors based on current and emerging economic data.
- Identify and address data gaps related to skill needs and workforce supply.
- Assess job growth potential, future employment trends, and skill requirements.
- Review and revise existing career pathways to ensure alignment with industry needs.
- Monitor partner coordination and collaboration to reduce service duplication and maximize impact.

The CIWB is committed to advancing the strategies outlined in the Massachusetts State Plan by fostering collaboration across all core and partner programs and ensuring the delivery of high-quality workforce services throughout the region.

The CIWB supports this strategy through the following actions:

- *Partner Engagement and Oversight*
The CIWB will convene local Memorandum of Understanding (MOU) partners quarterly to reinforce shared responsibilities and support ongoing collaboration. The regional MOU will be reviewed annually through 2029 to ensure it remains aligned with partner roles and system priorities.
- *Governance and Strategic Oversight*
The CIWB will hold monthly Executive Committee meetings and quarterly full Board meetings, as well as convene subcommittees as needed to provide strategic oversight, foster accountability, and advance regional initiatives.
- *Youth Program Integration and Academic Partnerships*
The Board will continue to oversee and integrate WIOA Youth Programming to ensure alignment

with regional workforce priorities and the evolving needs of young adults. In addition, the CIWB will spearhead Connecting Activities and YouthWorks – key initiatives designed to expand access to high-quality youth programming. Through these efforts, we aim to increase opportunities for work-based learning, career exploration, and career pathway education ensuring all young adults within the region are equipped with the skills, experiences, and support needed to succeed in the modern workforce. The Board has developed strong partnerships with all public schools across the Cape and the Islands. These strong partnerships with regional academic partners have strengthened support for youth focused initiatives including Innovation Career Pathways and Massachusetts Skills Capital Grants, which help students gain industry-recognized credentials and a competitive advantage in the labor market.

- *Monitoring Strategic Progress*

The CIWB will continue to monitor progress toward the goals outlined in the Regional Blueprint and Strategic Plan, ensuring alignment with employer needs, workforce trends, and community priorities.

- *WIOA Partnership Alignment*

Coordination of WIOA partnership opportunities is led by the WIOA Required Partners Committee, where partners align services in accordance with the region's MOU. This agreement, executed between the CIWB, the Barnstable County Commission (Chief Elected Official), and all required partners, guides the operation of the MassHire CICC and the delivery of workforce services.

(2) Please describe how your Board will work with entities carrying out core programs to:

a. Expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment.

b. Facilitate the development of career pathways and co-enrollment, as appropriate, in core programs; and

c. Improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and stackable).

The CIWB will continue to act as the convener of MOU negotiations and a central force in operationalizing service delivery. By working collaboratively with WIOA partners, the CIWB ensures seamless, coordinated services that produce strong outcomes for shared customers—youth, job seekers, and businesses across the Cape and Islands region.

The MassHire CICC is dedicated to ensuring universal access to workforce services for all job seekers across the region. As an entry point into the workforce system, all new participants are required to attend a Career Center Seminar (CCS). This seminar serves as an orientation to the MassHire system and provides an overview of the full range of services available through the career center.

The MassHire CICC is committed to supporting individuals with the most intensive services for which they are eligible under the Workforce Innovation and Opportunity Act (WIOA). Eligibility requirements apply to individualized and training services, and priority of service is given to the following populations:

- **Vulnerable Individuals**

Those facing significant barriers to employment—including individuals with disabilities, returning citizens, and English language learners—are prioritized for access to WIOA services and receive targeted support to overcome employment challenges.

- **Statutory Priority Populations**

WIOA mandates that local areas prioritize services for veterans, individuals receiving public

assistance, and other low-income adults. These job seekers are given first consideration for WIOA-funded training and career services.

- **Dislocated Workers**

Individuals who have lost employment due to layoffs, business closures, or economic shifts are eligible for dislocated worker services. The Cape and Islands Workforce Investment Board (CIWB) monitors dislocation trends across the region's five key employment sectors—Health Care and Social Assistance, Accommodation and Food Services, Educational Services, Retail, and Construction—to inform service strategies and support reemployment efforts.

Through this comprehensive approach, the MassHire CICC ensures that all job seekers, especially those most in need, have equitable access to the tools, training, and support necessary to achieve long-term employment success.

The CIWB is committed to building strong, strategic partnerships with regional stakeholders, including those across the workforce development, education, and community support systems, to secure targeted grant funding and expand impactful initiatives. These partnerships play a vital role in supporting individuals with barriers to employment, ensuring equitable access to training, services, and career advancement opportunities.

Guided by the WIOA Committee, the CIWB continually explores innovative approaches to assist individuals facing significant employment challenges. This includes leveraging the expertise and resources of both secondary and postsecondary education partners to develop and implement career pathways that align training, education, employment, and support services for youth and adults.

In collaboration with the State, the Board will work to ensure a diverse and sufficient network of training and career service providers is available throughout the Cape and Islands region. These services will be delivered in a manner that maximizes consumer choice and promotes competitive, integrated employment opportunities, particularly for individuals with disabilities.

To meet the workforce needs of priority industry sectors, the CIWB will:

- Promote and expand career pathways that lead to in-demand occupations.
- Support the development of stackable credentials and industry-recognized certifications that are portable and aligned with regional labor market needs.
- Increase access to work-based learning and upskilling opportunities for both new and incumbent workers.
- Strengthen communication between employers and training providers to ensure curriculum remains relevant and responsive to evolving workforce demands.
- Educate adults and youth about training options and career pathways through outreach and guidance provided by the MassHire CICC.
- Support community colleges and vocational schools in designing and updating curricula that prepare individuals for critical and emerging industries, including those in the clean energy, life sciences, and blue economy sectors.

The CIWB remains committed to improving access to activities leading to postsecondary credentials, including portable, stackable, and industry-recognized certifications that empower job seekers and strengthen the regional economy.

(3) Please describe the strategies and services that will be used in your local area:**a. To facilitate engagement of businesses in workforce development programs, including small businesses and businesses in high- demand industry sectors and occupations.**

The CIWB in partnership with the MassHire CICC will facilitate the continued engagement of businesses across the region by developing, maintaining and strengthening relationships within the business community. This collaborative approach ensures that employer needs are understood and addressed, helping to align talent development strategies with real time labor market demands. Through ongoing outreach, customized support, and industry – informed partnership, we will work to build a responsive workforce system that supports business growth and regional economic vitality. The CIWB has established strong and strategic partnerships within the healthcare sector – one of the region’s priority sectors. These partners meet regularly to assess workforce needs, align training opportunities, and ensure that the sector continues to evolve in response to changing demands. By maintaining open lines of communication and focusing on closing identified skills gaps the CIWB and its partners are working collaboratively to strengthen the healthcare talent pipeline and ensure a steady, qualified workforce to meet current and future needs. The CIWB regularly hosts sector-based convenings to continue to identify workforce needs, address skills gaps and guide program development. Through the strong partnership with the MassHire CICC, the CIWB ensures that the Business Service Team (BSR) proactively engages with employers to provide recruitment assistance, labor market information and customized workforce solutions. The CIWB continues to leverage regional and statewide funding opportunities – such as WCTF to support training aligned with employer demand and priority sectors. Through these strategies, the CIWB ensures that business engagement is not transactional, but sustained and meaningful – helping to build a workforce system that is employer-informed, future-focused, and regionally responsive.

b. To serve agricultural businesses including plans to improve services.

The MassHire CICC is a service delivery process is customer centered. An individual’s flow through the career center’s services is determined by the customer’s needs. WIOA identifies priority populations that are most in need of WIOA-funded services (Mass Workforce Issuance 100.DCS 08.16). Individualized services and training services must be given on a priority basis to:

- Migrant Seasonal Farm Workers (MSFW)
- Adultly Priority of Service Populations (POS)
- Veterans
- Recipients of public assistance
- Other low-income individuals (in accordance with the Federal Poverty Guidelines and Lower Living Level Standard Income Levels)
- Individuals who are basic skills deficient

MassHire CICC staff must ensure that Migrant Seasonal Farm Workers (MSFW) receive services on a basis which is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFW’s (Mass Workforce Issuance 100 DCS 08.105.1). When a job seeker contacts the Reception Desk, the Receptionist inquires whether the individual is:

- A Migrant Seasonal Farmworker. Migrant Seasonal Farm Workers (MSFW) receive services on a basis which is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFW’s. If a MSFW, the receptionist follows the standard operating procedures described in the Migrant Seasonal Farm Worker Desk Reference.

c. To support a local workforce development system that meets the needs of businesses.

To support the local workforce development system that meets the evolving needs of businesses, the CIWB and the MassHire CICC employ a strategic, data-informed and collaborative approach. Both the CIWB and the MassHire CICC regularly engage with local businesses and industry leaders to understand

the labor market needs, skills gaps and hiring trends. These insights directly inform program design and training investments. Employers within the region are well-versed training programs and the facilitation of career pathway and career ladder training opportunities. The CIWB leads and supports sector-based initiatives such as healthcare and clean energy – ensuring that training and education align with employer demand.

The MassHire CICC through a dedicated Business Services Team provides direct support to employers – including job matching, recruitment, hiring events and job fairs.

d. To better coordinate workforce development programs and economic development.

The CIWB Board members include Cape Cod Chamber of Commerce, Cape Cod Healthcare, Cape Cod Community College, Cape Cod Five, Upper Cape Tech and Cape Cod Tech just to name a few. In addition to our strong board membership, the CIWB established strong partnerships with all public-school administrations within the region, including both Martha's Vineyard and Nantucket, Chambers of Commerce across the region, and the Cape Cod delegation. These partnerships receive up to date communication from the CIWB regarding workforce and economic development initiatives and strategies.

Through regular convenings, sector partnerships, and our leadership in regional planning efforts we ensure training programs reflect labor market demand and that talent pipelines are developed in collaboration with employers across the region.

e. To strengthen linkages between reemployment assistance and unemployment insurance programs.

The CIWB and the MassHire CICC will ensure compliance with RESEA services and requirements. RESEA is designed to help individuals receiving unemployment benefits to return to work faster. Selected claimants are required to be provided with services to remain eligible for program benefits. As part of case management MassHire CICC staff will ensure that RESEA participants are receiving career center services.

f. Describe how your Board coordinates workforce investment activities carried out in the local area with statewide Rapid Response activities.

The CIWB coordinates local workforce investment activities with statewide Rapid Response efforts by maintaining a close partnership with the MassHire Department of Career Services (DCS) and the Rapid Response team. When a layoff or closure is reported, the CIWB works in collaboration with the MassHire CICC to ensure that affected workers receive timely comprehensive services. The MassHire CICC team coordinate with the Rapid Response team to ensure a variety of services are offered to those impacted this includes:

- On-site individual employment counseling
- On-site job search workshops
- Job placement services
- Coordination with WIOA partners

Additionally, the MassHire CICC Business Services Team attends BizWorks meetings ensuring all relevant information is shared throughout the region.

g. Please describe procedures to offer MassHire Career Center Business Services programs to local businesses.

Understanding the unique characteristics, abilities, and challenges of the local workforce has allowed for consistent customer and employer centered services. These structured partnerships with regional businesses lead to an overall effective workforce system. The Executive Director of the CIWB, MassHire CICC Executive Director, and the MassHire CICC Career Center Manager all meet frequently to

coordinate business outreach. The strong collaborative partnership has assisted the region in identifying employer needs across the region. Additionally, CIWB Board meetings are held frequently at the MassHire CICC to ensure our board members are aware of the many services offered by the career center. This strategy promotes a well-informed board, which is comprised of many regional employers.

The longstanding partnerships that the MassHire CICC holds with businesses, chambers of commerce, and industry associations enable its business service team to readily connect talent to companies seeking workers.

The MassHire CICC Services Team:

- ✓ Conducts demand-driven, industry- specific, pre-screened recruitment events utilizing Crystal Reports to identify prospective job seekers, conduct in-person preliminary interviews and present the best qualified candidates.
- ✓ Host and aggressively promote hiring events for employers throughout the year.

The MassHire CICC Business Service Team assists businesses across the region in meeting their employment needs. The Business Service Team continues to expand their social media presence, increasing their audience significantly.

The BSR team is well-versed on many state initiatives such as: Mass BizWorks, Rapid Response, Work Share, Work Opportunity Tax Credit, Workforce Training Fund & On-the-Job Training.

h. Describe implementation of any initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies designed to meet the needs of regional businesses. These initiatives must support the strategy described in paragraph(3)(b) of this section.

The CIWB implements a variety of business-facing strategies and initiatives to address the evolving workforce needs of regional employers. These efforts are closely aligned with the region's broader workforce strategy outlined in section 3(b), which emphasizes demand-driven service delivery, industry-responsive training, and strong career pathways for job seekers. Below are key initiatives in place:

1. On-the-Job Training (OJT) Programs

The CIWB facilitates OJT opportunities with local employers to provide participants with paid, hands-on learning while offsetting training costs for businesses. OJT placements are focused in priority sectors such as healthcare, trades, and clean energy. These programs:

- Bridge skills gaps for job seekers with limited experience,
- Help employers fill positions quickly with tailored training,
- Offer wage reimbursements that incentivize hiring and retention.

2. Customized Training Programs

In partnership with employers and training providers, the Board supports customized training tailored to a company's specific needs. This strategy ensures that new hires and incumbent workers gain the exact technical or soft skills required by the employer. Recent examples include:

- Customer service and supervisory training for hospitality businesses,
- CNC and technical training for advanced manufacturing firms.

3. Industry and Sector-Based Strategies

The CIWB convenes sector partnerships with employers, educators, and community stakeholders in high-demand industries. These include:

- Healthcare – in collaboration with Cape Cod Healthcare, the Board is working to expand training for medical assistants, phlebotomists, and CNAs.
- Construction & Skilled Trades – through partnerships with the Home Builders & Remodelers Association of Cape Cod (HBRACC), CIWB co-hosts events like Residential Construction Career Day and develops skilled labor pipelines.
- Marine Science & Blue Economy – CIWB supports industry-aligned credentialing and internship opportunities connected to the Cape Cod Blue Economy Foundation and marine research institutions.

4. Career Pathways Initiatives

The CIWB collaborates with school districts, adult education providers, and postsecondary institutions to establish clear, stackable credential pathways in fields such as healthcare, education, and environmental science. Examples include:

- Early College and Innovation Pathway programs with local high schools,
- Dual enrollment opportunities that blend academic learning with work-based experiences,
- Summer employment programs like ArtWorks that introduce youth to creative economy careers.

5. Utilization of Business Intermediaries

The CIWB utilizes effective intermediaries, including chambers of commerce, regional economic development organizations, and industry associations, to:

- Engage employers in workforce planning,
- Promote public-private training collaborations,
- Disseminate information about funding opportunities and hiring incentives.

These partnerships expand the Board's reach and ensure that services are designed with direct employer input.

6. Incumbent Worker Training

While leveraged on a case-by-case basis, CIWB promotes Incumbent Worker Training to upskill current employees and prevent layoffs. These efforts are often supported by state grants, such as the Workforce Training Fund Program (WTFP), and facilitated in partnership with local businesses.

7. Other Business Services

Through the MassHire Career Center's Business Services Team, employers are provided with:

- Recruitment and job posting assistance,
- Labor market intelligence,
- Hiring events and candidate screening,
- Layoff aversion strategies and Rapid Response coordination.

Alignment with Local Strategy

All initiatives outlined above reinforce the Cape & Islands region's strategic focus on:

- Responsive, employer-informed program design;
- Strengthening workforce pipelines across priority industries;
- Expanding access to training and employment for underrepresented and underserved populations;

- Building long-term talent solutions through career pathways and cross-sector collaboration.

Together, these demand-driven strategies ensure that the local workforce system remains agile, relevant, and effective in meeting the needs of regional businesses and job seekers alike.

(4) Please provide a description of how your Board:

a. Coordinates local workforce investment activities with regional economic development activities.

To ensure the continued advancement of local workforce activities and strategies, CIWB will convene regular meetings with its Board of Directors, Executive Team, and Regional Planning Committee and Youth Council. These leadership groups will remain focused on the implementation and monitoring of the Cape and Islands Regional Blueprint, serving as the foundation for guiding the region's workforce priorities. This collaborative approach ensures that the region's economic vitality is regularly reviewed and that emerging challenges are addressed promptly, especially as the region continues to adapt to a post-pandemic economy.

b. Promotes entrepreneurial skills training and micro-enterprise services.

To support entrepreneurial growth and economic resilience, the CIWB will continue its strong partnership with Entrepreneurship for All (EforAll). This collaboration directly addresses regional challenges such as the housing-wage gap by promoting inclusive economic opportunity. EforAll offers programs such as a Business Accelerator, Pitch Contests, and Virtual Workshops, all designed to support aspiring entrepreneurs—particularly underrepresented individuals and minorities—through business training, mentorship, and access to a professional support network. The CIWB has actively participated in EforAll's Business Accelerator Program by offering professional mentorship and workforce development support, reinforcing its commitment to expanding access to business ownership and self-sufficiency. Together, these efforts will help diversify the region's economy, promote innovation, and empower job seekers to explore entrepreneurial pathways.

(5) Please describe the MassHire Career Center system in your area, including

a. How the Board ensures the continuous improvement of eligible providers and that such providers will meet the employment needs of local businesses, workers and job seekers.

b. How the Board facilitates access to services provided through the MassHire Career Center(s), including in remote areas, using virtual services, technology and other means.

c. How entities within the MassHire Career Center system, including Career Center Operators and Partners, ensure compliance with WIOA sec. 188 and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) 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.

d. The roles and resource contributions of your Partners – please describe how these relationships are sustained and kept productive.

The CIWB oversees a coordinated, demand-driven workforce system designed to meet the evolving needs of local businesses, job seekers, and workers. The MassHire delivers high-quality workforce services aligned with WIOA objectives. Below is a breakdown of how the Board ensures system excellence, access, compliance, and collaboration.

The CIWB supports continuous improvement through:

- Ongoing monitoring and oversight of eligible training provider list (ETPL) to ensure alignment with regional labor market demand and performance benchmarks, including completion rates, credential attainment, and employment outcomes.

- A data-informed approach, using labor market information (LMI), employer feedback, and performance metrics to identify strengths and areas for improvement.
- Quarterly performance reviews with Career Center staff and partners to analyze service delivery outcomes and customer satisfaction.
- Employer engagement efforts, including Business Services Team meetings and sector-based roundtables, which inform training strategies and ensure provider offerings reflect real-time industry needs.

This system ensures that ETPL continuously adapt to support the region's high-demand industries—such as healthcare, trades, marine science, and hospitality—and that services meet the expectations of both employers and job seekers.

The MassHire CICC maximizes access to services through:

- Multiple service delivery methods, including in-person appointments, walk-in hours, virtual workshops, one-on-one counseling via Zoom or phone, and a user-friendly online platform.
- Mobile and hybrid service delivery, enabling individuals in remote areas of Cape Cod, Martha's Vineyard, and Nantucket to access core services such as resume writing, job search assistance, and training referrals without geographic barriers.
- A robust website and social media presence, which promotes services, events, and job opportunities.
- Collaboration with libraries, schools, and community-based organizations to offer satellite access and extend outreach in underserved communities.

These strategies ensure equitable access to workforce services for all residents, regardless of location or technology limitations.

The CIWB and Career Center Operator ensure full compliance with WIOA Section 188 and the Americans with Disabilities Act through:

- Physical and programmatic accessibility audits, conducted regularly to assess facility compliance and identify needed improvements.
- Assistive technology, including screen readers, magnification tools, and other accommodations available at the Career Center to support individuals with disabilities.
- Staff training on disability awareness and accommodations, in collaboration with partners such as the Massachusetts Rehabilitation Commission (MRC) and the Cape Organization for the Rights of the Disabled (CORD).
- Inclusive service delivery practices, such as customized employment and individualized career planning for job seekers with disabilities.

This commitment ensures that all programs, materials, and technologies are accessible and responsive to the needs of individuals with disabilities.

The MassHire Career Center system operates through strong partnerships with WIOA-mandated and community-based partners, including:

- Massachusetts Rehabilitation Commission (MRC) – providing vocational rehabilitation and disability-related support.
- Adult Education Providers – offering English language learning, high school equivalency preparation, and literacy training.

- Department of Transitional Assistance (DTA) – connecting public assistance recipients with job readiness and employment services.
- Department of Unemployment Assistance (DUA) – supporting individuals receiving UI benefits through job matching and reemployment services.
- Community-Based Organizations, Educational Institutions, and Veterans’ Services – delivering wraparound supports that complement workforce efforts.

These partners contribute staffing, referrals, technology, case management, and funding. Relationships are maintained through:

- Monthly partner meetings, to align efforts, troubleshoot barriers, and ensure resource coordination;
- MOUs that define roles, expectations, and cost-sharing arrangements;
- Joint professional development opportunities to enhance collaboration and cross-referral effectiveness.

Together, these efforts ensure a fully integrated and responsive career center system that leverages shared resources to serve the diverse needs of the Cape and Islands region.

(6) Please provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in your local area.

The Career Center service delivery process is customer-centered. In general, there is no simple straight line for customer flow. An individual’s flow through the career center’s services is determined by the needs of the customer. All services are available to career center members, the exception is for services which the customer must be determined eligible.

Priority Populations: WIOA identifies priority populations that are most in need of WIOA-funded services (*see Attachment A, Workforce Issuance 100 DCS 08.116*).

Individualized career services and training services must be given on a priority basis to:

- Migrant Seasonal Farm Workers (MSFW)
- Adult Priority of Service Populations (POS)
- Veterans
- Recipients of public assistance
- Other low-income individuals (in accordance with Federal Poverty Guidelines and Lower Living Level Standard Income Levels)
- Individuals who are basic skills deficient

Also, the career center staff must ensure that Migrant Seasonal Farm Workers (MSFW) receive services on a basis which is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs (*see Attachment B, Workforce Issuance 100 DCS 08.105.1*).

Entering the Career Center System

Customers enter the career center system from different sources including:

- Community-based Organizations
- Partner organizations, including ABE, MassAbility, MCB, DTA, and DUA, and
- Self-referrals, including Adult, Dislocated Worker, Youth, Veterans and individuals with disabilities.

Customers may enter the Career Center system through different routes, including:

- Staff members
- MassHire Job Quest

- MassHire CICC website
- Telephone

Veterans

Veterans and eligible spouses have Priority of Service and are asked to self-identify on initial contact. All veterans and eligible spouses are informed of Priority of Service upon their initial contact and are asked to complete a simple checklist to identify Significant Barriers to Employment as defined in JVSG. If initial contact is through Reception, veterans and spouses are requested to complete the form, which is screened to identify any barriers. Any veterans who have self-identified barriers are referred to non-veteran staff to complete the JVSG SBE checklist.

If the initial contact is by telephone, all veterans and eligible spouses are verbally asked the checklist items to determine if Significant Barriers to Employment are present. This form is also available on the MassHire CICC website and can also be emailed to prospective job seekers.

Any veteran who has a self-identified barrier to employment is referred to non-JVSG staff to complete the SBE checklist. Those veterans identified as having a Significant Barrier to Employment (SBE) are referred to Veterans Employment Representative. Those without an SBE are referred to employment counseling. In each instance, a service is recorded within MOSES.

Migrant Seasonal Farmworkers (MSFW)

Migrant Seasonal Farmworkers are identified in three ways:

1. MSFWs are primarily identified by becoming members of the Career Center and registering on JobQuest. JobQuest asks the question, “Have you worked in agriculture or food processing in the last 12 months?” If a customer responds “Yes”, JobQuest asks to follow up questions.
2. MSFWs also are identified and coded when a career center staff person works with the customer individually and reviews the customers MOSES data.
3. A third method to identify MSFWs is a periodical review of crystal report generated to identify individuals who indicated that they worked within agriculture or food processing in the last 12 months.

The career center provides services to MSFWs that are qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs. All MSFWs are offered access to all career center services equitable to the access all other customers enjoy. Staff responsibility is to review the engagement history of MSFWs with the career center to ensure that they have had and will have equitable access to services.

Orientation – Career Center Seminar

The Career Center Seminar (CCS) serves as an introduction to the services and resources available through MassHire CICC.

This includes:

- Orientation to the center and its myriad of services, including Basic, Individualized, Training and Follow-up Services
- Initial Assessment
- Development of a Career Action Plan
- Introduction to Labor Market Information, including in-demand industry sectors and occupations
- Information regarding training providers
- Enrollment to receive weekly Hot Job lists and weekly job alerts
- Information regarding support services

- Information about federally funding employment programs such as Trade, WOTC, Migrant Seasonal Farm Workers, Adult Priority of Service populations, and National Dislocated Worker Grants
- Information regarding Veterans Services, including Priority of Service
- Information regarding Unemployment Insurance and eligibility requirements
- Information about the Resource Room available to assist job seekers
- Information regarding Youth programming

Basic Services

Basic Services are available to all career center members, these services include:

- Determination of eligibility to receive assistance from adult, dislocated workers or youth programs
- Initial assessment of skill levels including literacy, numeracy and English language proficiency as well as aptitudes, interests, and abilities using such tests and assessments as TABE, Career Scope, and O*Net Interest Profiler
- Information about supportive services such as Fuel Assistance, SNAP, Transitional Assistance, the Migrant Seasonal Farm Workers Program and the Office of Multi-lingual Services
- Referrals to supportive services, including childcare and child support, as well as medical and child health insurance access through the MassHire CICC partner – Community Action Committee of the Cape and Islands, Inc.
- Labor market information, including job vacancy listings, skills needed to obtain vacant jobs, information about in-demand occupants, as well as pay and job qualifications
- Performance and cost information on eligible providers of training and education services
- Information on local performance on accountability measures, as well as information about the Cape and Islands one-stop delivery system
- Information about and meaningful assistance with claims for unemployment compensation
- Assistance in establishing eligibility for financial aid assistance for training and education programs.
- Basic Services are provided by the Basic Services Team, the Basic Services Team consists of all the career center staff.
- The Career Consultants conduct determination of eligibility for adult, dislocated worker, and youth programs, as well as providing labor market information and referrals to supportive services
- Some basic services are provided during the Career Center Seminar, such as intake and orientation to Center services and information about eligible training and education programs
- Career Readiness Workshops are facilitated by Career Consultants, Business Services Team and Computer Literacy Workshop Facilitators
- Reception provides information about such services as Unemployment Insurance and Center job search workshops
- The Resource Room staff provides job search assistance and job listings.
- Employment Counselors, in addition to providing re-employment services and referrals to supportive services, provide over-the-shoulder assistance with UI claims
- Upskilling Navigator provides information regarding ARPA-funded upskilling training programs and assists interested customers with the training provider's application process

Individualized Services for MSFW, Title I Adults and Dislocated Workers

Customers may request individualized services at any time. The individualized services team consists of Career Consultants, the Business Services staff, and the Veterans' Employment Representative (for Veterans).

Individualized services include:

- Comprehensive and specialized assessments of skill levels and service needs using diagnostic and other assessment tools, as well as in-depth interviewing and evaluation to identify employment barriers and employment goals
- Development of an individual employment plan with employment goals and objectives, as well as a plan for the use of appropriate services to accomplish employment goals
- Group and individual counseling
- Career planning
- Short-term pre-vocational services, including development of learning, communication and interviews skills
- Internships and on-the-job training
- Workforce preparation activities
- Off Cape job search assistance and relocation assistance
- English language acquisition and integrated education and training programs
- Training services, including financial support through the Individual Training Account.

Customers who request Individualized Services are referred to a staff member who assists customers to determine eligibility for Individualized Services, as well as design their job search plan and oversee their flow through the Center's services.

The standard process for customers in individualized services is as follows:

- Attendance and member registration through CCS
- Intake meeting with the Career Consultant to determine income eligibility; if a customer is not eligible, she/he is referred to Basic Services to develop job search skills and techniques
- Comprehensive assessment including in-depth interviews and evaluation as well as diagnostic testing including the TABE and Career Scope
- Provisions of information about and possibility referral to supportive services as needed
- Enrollment in Individualized Services (Case Management) if the customer is eligible and assignment to a Career Consultant
- Career counseling leading to a career plan
- Development of an individual employment plan, which includes participation in such Basic Services as workshops on resume and cover letter preparation
- Enrollment in the Learning Center Hi-Set preparation program, if the customer requests Hi-Set preparation
- If the customer requests training or education Individual Training Account (ITA) funding, the customer, together with the Career Consultant:
 - ✓ Considers labor market information regarding the customer's job objective
 - ✓ Identifies training program vendors are identified, considered and researched with performance with performance and cost data of training/education programs
 - ✓ Assesses availability of jobs by review of local job postings
 - ✓ Interviews with at least three people working in the career field of interest to the customer
 - ✓ A training funding request is submitted to the management Training Committee for approval
 - ✓ A training vendor contract is prepared and reviewed for approval
 - ✓ Customer attends training and fulfills programs requirements

A customer may receive other individualized services provided by the Business Services team such as:

- Interview coaching
- Job development

- Work experience, on-the-job training or an internship

All customers eligible for Individualized Services are offered:

- Labor market information
- Resume and cover letter critique and development
- Job search coaching
- Placement assistance

Follow-up Services

Follow-up services are provided for customers who were enrolled in individualized services and have entered employment or another positive outcome. Follow-up services may include but are not limited to:

- Additional career planning and counseling
- Information about additional educational opportunities
- Referral to supportive services as needed
- Referral to Basic Services
- Case Management administrative follow-up

(7) Please provide a description and assessment of the type and availability of youth workforce investment activities in your area including activities for youth who are individuals with disabilities. Please include an identification of successful models of such activities. Please also provide a description of youth workforce investment activity coordination with the Department of Transitional Assistance, MassAbility and Massachusetts Commission for the Blind.

Program activities under the Out-of-School Youth Program encompass all 14 elements required under WIOA. These elements are tailored to meet the individual needs of out-of-school youth ages 16 to 24 who face barriers to employment. Many participants experience significant challenges, such as being pregnant or parenting teens, being high school dropouts, or having disabilities. For youth working toward their HI-SET credential, the program provides academic preparation paired with work experience opportunities. Once they obtain their HI-SET, participants are supported in transitioning to college, occupational skills training, on-the-job training, or direct job placement. Career guidance and individualized support help youth identify their long-term goals and the steps needed to advance.

For out-of-school youth who do not require a HI-SET credential, the Career Center offers activities including, but not limited to, work experience or internships combined with education, occupational skills training, and job development and placement services. All services are inclusive and designed to be fully accessible for youth with disabilities.

During the school year and summer months, youth ages 14 to 21 who live on Cape Cod and the Islands and face employment barriers are encouraged to participate in the YouthWorks Program. This program provides employability skills training, career readiness classes, and paid work experiences at minimum wage for each hour of participation.

The MassHire CICC extends these services to youth through partner agencies such as the Department of Transitional Assistance (DTA), the Massachusetts Rehabilitation Commission (MRC), and the Massachusetts Commission for the Blind (MCB). JTEC, the lead operator of the Career Center and a 501(c)(3) organization, also operates a Young Parent Program funded by DTA. This program supports out-of-school youth ages 14 to 24 who are receiving public assistance in earning their HI-SET/GED, enrolling in college, or entering an occupational training program.

The CIWB has made significant strides in strengthening the region's workforce development system, particularly in collaboration with secondary and postsecondary education programs. Innovation Pathway grants have played a key role in connecting students with meaningful career opportunities in high-demand

sectors. The CIWB continues to explore new grant opportunities focused on both high-demand industries and growing sectors such as STEM.

A standout example of this success is the award-winning Residential Construction Career Day, developed in partnership with the Home Builders and Remodelers Association of Cape Cod. This event connects students with industry professionals through hands-on, immersive experiences and showcases career opportunities in a critical regional sector.

The Connecting Activities program, coordinated by the CIWB and funded by the Department of Elementary and Secondary Education (DESE), supports college and career readiness through a statewide infrastructure. Participating schools include: Barnstable High School, Bourne High School, Cape Cod Regional Technical High School, Dennis-Yarmouth Regional High School, Falmouth High School, Mashpee High School, Monomoy Regional High School, Nantucket High School, Martha's Vineyard Regional High School, Sandwich High School and Upper Cape Cod Regional Technical School.

Through Connecting Activities, students engage in meaningful career-related experiences that build career readiness and critical skills. Internship placements, work-based learning, and sector-focused exposure are all central to this initiative, which serves as a leading tool for developing career pathways for high school students. CIWB's year-round commitment to youth workforce development reflects the belief that today's youth are tomorrow's workforce.

Highlighted youth-focused initiatives supported or led by CIWB include:

- Regional support from school district principals, superintendents, and department heads
- Thriving ArtWorks Program, promoting career pathways in the creative economy
- Residential Construction Career Day
- CIWB's official YouTube Channel
- The CIWB Internship Program
- An active and engaged CIWB Youth Council
- A robust Financial Literacy Toolkit
- Annual participation in #MassSTEMWeek regional activities
- Leadership Academy opportunities for youth

These initiatives reflect CIWB's comprehensive and inclusive approach to building a strong and future-ready workforce across the Cape and Islands region.

(8) Please explain how the Board coordinates relevant secondary and postsecondary education programs and activities with education and workforce investment activities to coordinate strategies, enhance services, and avoid duplication of services.

The CIWB coordinates relevant secondary and post-secondary education programs and workforce investment activities through a strategic, collaborative approach designed to align systems, enhance services and avoid duplicative efforts. Through strategic partnerships and collaboration with local regional academic partners, including Cape Cod Community College, Cape Cod Tech, Upper Cape Tech and those academic partners involved in Connecting Activities, YouthWorks, Innovation Pathways and CTI. These partnerships enable the CIWB to develop coordinated strategies that support seamless transitions from school to career. The CIWB also leverages labor market data and regional planning efforts, this can be seen in our recently updated Cape & Islands Regional Blueprint, which identifies priority sectors and skills gaps. The CIWB is also fortunate to have board members representing Cape Cod Community College, Upper Cape Tech, Cape Cod Tech and Cape Cod Collaborative.

Program activities for the Out of School Youth Program include all 14 elements required under WIOA. Elements are presented to out-of-school youth based on the individual needs of the youth. Youth enrolled in the Out of School Youth Program are ages 16-24 and all have barriers to employment. Many youth engagement in HI-Set preparation is coupled with work experience, as once the Hi-Set credential is achieved, youth may go onto college, occupational skills training, on-the-job training, and job placement. Career guidance and support is provided to the young adult by identifying career goals and steps needed to move forward in a career.

For out of school youth who are not in need of HI-Set credential, the following activities are included but not limited to:

- Work experience or an internship coupled with education
- Occupational Skills Training
- Job Development and Job Placement

The CIWB operates the YouthWorks Program, which is a state-funded youth employment program that helps teens and young adults develop skills and experience needed to secure employment. Participants take part in paid short-term work placements during the summer and during the academic year. The CIWB aligns the YouthWorks program with our award-winning ArtWorks Program, to ensure all participants are connected to a regional artistic mentor.

(9) How does the Board coordinate WIOA title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area? Please include a description of how other programs and services in your local area are leveraged to complement workforce investment activities.

The MassHire CICC maintains a Support Services and Needs-Based Payment Policy designed to assist eligible WIOA participants with transportation costs related to training activities. Career Consultants work closely with participants to identify needs and provide access to transportation support and other allowable services, ensuring that customers can successfully engage in and complete their training programs.

(10) What plans, assurances, and strategies do you have in place for maximizing coordination, improving service delivery, and avoiding duplication of Wagner-Peyser Act (29 U.S.C. 49 et seq.) services and other services provided through the Career Center delivery system?

The MassHire CICC maintains a Support Services and Needs-Based Payment Policy to provide financial assistance to eligible WIOA participants. This policy helps cover transportation costs related to participation in approved training activities. Career Consultants work directly with participants to identify needs and facilitate access to transportation assistance and other available support services, ensuring individuals can fully engage in their workforce development plans.

(11) How are career and training services required under WIOA, provided to Migrant Seasonal Farm Workers (MSFWs) through the MassHire Career Center(s)?

Migrant and Seasonal Farmworker (MSFW) customers are primarily identified during JobQuest registration through a series of screening questions as they become Career Center members. Additionally, MSFWs may be identified by MassHire CICC staff who review customer information in MOSES or through generated Crystal Reports that flag individuals indicating agricultural employment within the past year.

The Career Center's goals for serving MSFWs include accurately identifying these customers within MOSES, ensuring that the quality and quantity of services provided to MSFWs are equitable to those offered to non-MSFW participants, increasing MSFW participation across all workforce development activities, supporting transitions of MSFWs into higher-paying, non-agricultural occupations when

appropriate, and expanding engagement with agricultural employers to better identify and serve MSFW populations.

To promote self-identification, MSFW signage outlining available services is prominently displayed at the Career Center's entry points. Information regarding MSFW services is also incorporated into the Career Center Seminar (CCS) to raise awareness among new participants.

MSFWs are identified in three ways:

1. MSFWs are primarily identified by becoming members of the Career Center and registering on JobQuest. JobQuest asks the question: "Have you worked in agriculture or food processing in the last 12 months?" If a customer says "Yes" JobQuest asks three follow-up questions:

Q: In the last 12 months;

- Did you work at least 25 days in farm work?
- Did you earn at least half of your yearly income from farm work?
- Were you employed year-round by the same employer?

Q: Did you have to travel to do farm work and could not return home in the same day? If the customer says "No" to the question "Did you work at least 25 days in farm work?", JobQuest asks "Did you work at least 25 days in a food processing plant where you were unable to return home each night?" If the customer says "Yes" to this question, JobQuest asks three follow-up questions:

- Did you earn at least half of your yearly income from food processing?
- Were you employed year-round by the same employer?
- Did you have to travel to do farm work and could not return home in the same day?

When a customer registers on JobQuest the customer is encouraged to complete all the JobQuest sections, particularly Work History. Work History can clarify whether a customer is a MSFW or not.

2. MSFWs also are identified and coded when a Career Center staff person works with a customer individually and reviews (and completes, when necessary) the customer's MOSES data.

Both the customer's answer to the "Have you worked in agriculture or food processing in the last 12 months?" question and the customer's work history should be reviewed. This should help clarify whether a customer is or is not a MSFW.

If the customer is determined to be a MSFW, then the "Have you worked...?" question (on the Basic page) in MOSES should be checked "Yes." Or if the customer is determined not to be a MSFW then the "Have you worked...?" should be checked "No." (See enclosed *MSFW Desk Aid*.)

Since a customer's work experience may change over time, a customer should be re-assessed periodically to determine if the customer is still a MSFW or is no longer a MSFW.

3. A third method to identify MSFWs is a periodically a crystal report generated to identify individuals who indicated that they worked in agriculture or food processing in the last 12 months.

Each customer identified is assessed to determine whether the customer is or is not a MSFW. The MOSES data is corrected as needed.

Any identified MSFW will be provided career and training services as required by WIOA in accordance with the service delivery process given to all Career Center customers.

All customers, including MSFWs, are offered access to all Career Center's services equitable to the access enjoyed by other Career Center customers. A staff responsibility is to review the engagement history of MSFWs with the Career Center to ensure that they have had and will have equitable access to services.

The Career Center considers and is sensitive to the preferences, needs and skills of individual MSFWs and the availability of job and training opportunities.

The Hot Jobs list includes local agricultural jobs when available.

Language assistance is provided as needed, including translation assistance of documents.

Staff doing employer and job development, including Business Services, should reach out to agricultural enterprises, as with other employers, to solicit job postings, inform employers of the Career Center services and to inform employees/job seekers of the Career Center services.

Staff doing job placements should keep in mind that some job seekers want agricultural jobs.

Steps are taken to ensure that Limited English Proficiency customers have access to the programs, services and information provided by the Career Center.

The Career Center staff provides MSFWs available career and supportive services in their native language when reasonable and possible.

When referrals are made to other appropriate services, the Center staff conducts follow-up and documents the results in MOSES.

Job order information is available to all customers, including MSFWs. Center staff provide adequate assistance to MSFWs to access job order information easily and efficiently.

(12) Please describe how the Board coordinates WIOA title I workforce investment activities with adult education and literacy activities under WIOA title II. This description must include how the Board carries out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.

The Executive Director of the CIWB actively serves on the committee established by the Department of Elementary and Secondary Education (DESE) to review local adult education and literacy proposals submitted through DESE's RFP process. This role includes reading and independently scoring each proposal, followed by a committee meeting to discuss evaluations and rankings. The scores are then averaged to produce a cumulative score for each proposal. Based on these scores, the committee selects the most qualified vendors to deliver services across the Cape and Islands region. As part of the

evaluation process, the CIWB Executive Director and fellow committee members also conduct site visits to programs seeking funding.

Once vendors are selected, the MassHire CICC implements a formal referral system to ensure that job seekers from all WIOA partner programs are effectively connected to appropriate services. This process helps guarantee that each job seeker receives the support needed for successful workforce participation.

Once the referral form is received, Career Center staff will contact the referred individual to schedule a meeting. After the appointment is set and initial contact is made, the Career Center will provide the referring WIOA partner with an update on the status of the referral, ensuring clear communication and continuity of services.

The MassHire CICC currently utilizes the MOSES system to intake and manage customer cases. The Workforce Board is collaborating with partner agencies to develop information release forms that will facilitate data sharing for shared customers across the workforce development system. In addition, the Board and its partners are committed to supporting statewide efforts to create a shared intake and case management system that enhances coordination among all partner agencies.

(13) Please provide the name and contact information of your Fiscal Agent.

Fiscal Agent Name: Job Training and Employment Corporation (JTEC)
Contact Person: Kristina E. Dower, President
Address: 88 North Street, Hyannis, MA 02601
Telephone: (508) 862-6160
Email: jtecked@aol.com

(14) Please describe the competitive process that is used to award the subgrants and contracts for WIOA title I activities.

The CIWB has adopted for operating purposes the following WIOA related policy 100.DCS 01.102 effective the date of issuance May 12, 2016.

Policy: Procurement and Contracting

Purpose: To enact policy regarding procurement and contracting requirements.

Background: The federal government has established standards for procurement and contracting to ensure that federally funded programs obtain goods and services in the most cost-effective manner. These standards also ensure open and fair competition for all prospective providers.

Policy: This Policy outlines the requirements for procurement and contracting for all funds provided through the Department of Career Services (DCS), including, but not limited to, Workforce Innovation and Opportunity Act (WIOA). Attachments provide guidelines for developing and conducting solicitations, contracting and monitoring of contracts, and checklists for procurement and contract files.

Action: Those Governmental entities and other organizations subject to more restrictive state or local procurement thresholds and requirements, e.g., Massachusetts General Laws Chapter 30B, must comply with the more restrictive policy.

References:

2 CFR Part 200.317-200.326

MGL Chapter 30B

MGL Chapter 268A Massachusetts Conflict of Interest Law

Sections 8301-8303 of Title 41 (Buy American Act)

Environmental Protection Agency (EPA at 40 CFR Part 247)

6002 of the Solid Waste Act

Federal Acquisition Regulation (FAR) at 48 CFR Subpart 2.1

Wagner Peyser Act 29 U.S.C 49 et seq.

(Please refer to Attachment C to review the full policy.)

(15) Please provide the local levels of performance negotiated with the Governor and chief elected official consistent with WIOA sec. 116(c), to be used to measure the performance of your local area and to be used by the Local Board for measuring the performance of your local fiscal 6 agent (where appropriate), eligible providers under WIOA title I subtitle B, and the Career Center system in the local area. Local Boards may insert or provide a link to local performance goals. The link must be accessible to ACLS bidders.

In accordance with Section 116(c) of the Workforce Innovation and Opportunity Act (WIOA), the CIWB has negotiated local levels of performance with the Governor and Chief Elected Official. These performance levels serve as key benchmarks to assess the effectiveness of:

- The local workforce development area;
- The local fiscal agent, where appropriate;
- Eligible providers under WIOA Title I, Subtitle B; and
- The MassHire Career Center system within the Cape & Islands region.

These performance indicators reflect the primary WIOA performance measures and are aligned with state-negotiated levels, adjusted for local economic conditions and participant characteristics. The performance levels support continuous improvement and accountability in service delivery.

The most recent local performance levels for Program Years 2024 and 2025 are available below:

ATTACHMENT M1 WIOA - LOCAL AREA FY2025 PERFORMANCE GOALS REQUEST FORM			
CONTACT PERSON / EMAIL:		Kristina Dones@ciwb.com	
WORKFORCE BOARD NAME:		Cape and Islands	
A PERFORMANCE MEASURE	<input checked="" type="radio"/> FY2025 <input type="radio"/> Use FY2025 Target Goals (SAM) <input type="radio"/> Propose Same as All New FY2025 Goals		
	B FY 2025 STATE GOAL	C FY 2025 LOCAL TARGET GOAL (SAM)	D FY2025 NEW PROPOSED LOCAL GOAL
WIOA ADULT MEASURES			
Employment Q2	73.5%	73.5%	
Employment Q4	75.0%	64.0%	
Median Earnings Q2	\$7,900	\$10,001	
Credential Rate	68.0%	68.0%	
Measurable Skill Gains	41.5%	64.2%	
WIOA DISLOCATED WORKER MEASURES			
Employment Q2	78.0%	77.7%	
Employment Q4	81.0%	74.6%	
Median Earnings Q2	\$12,000	\$14,150	
Credential Rate	70.0%	79.6%	
Measurable Skill Gains	45.0%	68.5%	
WIOA YOUTH MEASURES			
Employment/Education Q2	75.0%	78.2%	
Employment/Education Q4	72.0%	68.7%	
Median Earnings Q2	\$4,500	\$4,136	
Credential Rate	60.0%	58.9%	
Measurable Skill Gains	45.0%	49.1%	
<small>If requesting goals other than the Target goals, local areas must provide a justification with evidential data and fill in column D. FY2025 NEW PROPOSED LOCAL GOAL</small>			
<small>Submit by email to Lisa.J.Cassie@mass.gov</small>			

These levels include targets for the following indicators:

- Employment Rate in the 2nd and 4th quarters after exit
- Median Earnings in the 2nd quarter after exit
- Credential Attainment Rate

- Measurable Skill Gains
- Effectiveness in Serving Employers

The Local Board will use these negotiated levels to measure program performance across all applicable partners and service providers, ensuring alignment with state and federal expectations.

(16) What are the actions and activities that support the MassHire Board's continued status as a high-performance workforce board?

New members of the CIWB meet individually with the Executive Director and participate in a formal orientation designed to familiarize them with the workforce development system. The orientation includes an overview of the federal and state workforce systems, the role and responsibilities of a board member, an introduction to CIWB committees, and a review of key initiatives such as the MassHire CICC, Connecting Activities, ArtWorks, and current grant-funded activities.

As part of onboarding, all Board members complete a conflict-of-interest training and participate in new member orientation sessions, in addition to engaging in strategic planning efforts. CIWB Board members are highly involved in workforce development initiatives across the region and actively promote the use of Career Center services to meet their business needs.

Prior to the pandemic, CIWB board meetings were held bi-monthly at the MassHire CICC, fostering regular interaction between board members and Career Center staff. Board members are encouraged to use Career Center services such as specialized recruitment, job postings, and participation in job fairs.

In addition to governance roles, CIWB Board members support regional initiatives by engaging with local high schools, attending and speaking at events including Residential Construction Career Day, ArtWorks Exhibit, and Women & Girls Mentoring Breakfast. They also participate in mock interviews, serve on career panels, offer company tours, and provide job shadowing opportunities, demonstrating their commitment to workforce and youth development throughout the Cape and Islands region.

(17) How are the training services outlined in WIOA sec. 134 provided using individual training accounts? If contracts for training services are or will be used, how is/will the use of such contracts coordinated with the use of individual training accounts?

Customer choice is ensured since MassHire CICC staff work with the job seeker to determine the best choice in the selection of a training program. Referral for skills training can occur after the job seeker has been determined eligible for services and has been enrolled in individualized services. When a job seeker is interested in pursuing skills training and has no existing or marketable skills, or the customers' existing skills are not sufficient to earn a sufficient wage, the MassHire CICC Career Consultant may consider recommending skills training. The intent of skills training is to provide the job seeker with comprehensive, short-term vocational instruction that will facilitate entry or re-entry into the workforce.

Skills training is provided in the critical or emerging industries included within the CIWB's Regional Blueprint. Each job seeker pursuing skills training must also complete a Career Exploration Guide. This requires the job seeker to contact and investigate at least three training vendors that provide instruction compatible with the job seeker's employment goal. The job seeker must also contact at least three employers who hire or work within the field of the recommended career training to explore the employment potential of the planned instruction. When a training packet is complete, the job seeker and the career consultant review the research and agree that pursuit of the skills training in question is feasible and that, based on assessment results, it fits the job seeker's needs, abilities, and the current labor market demand. A training vendor is then selected that best meets the job seeker's needs, is reasonable in cost, and provides the most comprehensive training.

The career consultant then initiates a contract between the MassHire CICC and the recommended training vendor for an Individual Training Account (ITA). The ITA is specific to each job seeker. The career consultant completes the contract and directs it to the vendor for signature.

WIOA funds are funds of last resort. The career consultant works with the job seeker and the selected training vendor to determine if the job seeker is eligible for Pell Grants or other grants. If the job seeker is eligible for grants, the amount of these grants is deducted from the total cost of training and the Individual Training Account (ITA) is written for the difference up to the ITA cap amount. If the job seeker's eligibility for a Pell or other grant cannot be determined at the time the contract is written, the contract contains language that states the training vendor must assist the job seeker in completing a Pell Grant Application and that any funds received must be deducted from the cost of training contained in the ITA contract. The CIWB establishes the ITA cap which is currently \$15,000.

All training vendors considered for job seekers must be initially approved in Training Pro at the state and local level and must appear in MOSES, as an approved training vendor for an ITA. This is called the Eligible Training Provider list. The Contract/Quality Assurance Specialist at JTEC facilitates the approval process. Providers must submit all qualifying information prior to the contract finalization.

(18) Please describe how training services under chapter 3 of subtitle B will be provided in accordance with section 134(c)(3)(G), including, if contracts for the training services will be used, how the use of such contracts will be coordinated with the use of individual training accounts (ITA) under that chapter and how the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided.

Customer choice is a core principle of the MassHire CICC. Career Consultants work closely with job seekers to identify the most appropriate training program that aligns with their career goals, abilities, and current labor market demand. Once a job seeker is determined eligible for services and enrolled in Individualized Services, they may be referred to skills training if they lack marketable skills or require updated training to earn a living wage.

The goal of skills training is to provide comprehensive, short-term vocational instruction that supports entry or re-entry into the workforce. Training may also be approved to enhance existing skills, ensuring competitiveness in the labor market.

Career Exploration and Approval Process:

- The job seeker must complete a Career Exploration Guide, identifying and researching at least three training providers and three employers within the chosen field.
- The Career Consultant reviews the guide with the job seeker to ensure feasibility and alignment with labor market demand.
- The Career Consultant submits a training request and Career Exploration Guide to the Training Committee for review.
- Upon approval, the Consultant and job seeker proceed with developing an ITA contract with the selected training vendor.

ITA Contract Process:

- The ITA cap is \$15,000, as defined by CIWB policy. The Career Center covers up to this amount.
- WIOA funds are considered funds of last resort. Pell Grants and other financial aid must be applied first, and their amounts are deducted from the total training cost.
- If the job seeker's eligibility for aid is unknown, the vendor must assist the customer in applying and deduct the aid amount once determined.

- If training costs exceed the ITA cap, the job seeker is responsible for the self-pay amount and must provide proof of payment before the Career Center processes payment.

Review and Approval:

- The Career Consultant prepares the contract packet, which includes a Contract Memo, Case Plan, Career Exploration Guide, and supporting documents.
- The packet is reviewed by the Director of Education and Special Programs, then by the Contract/Quality Assurance Specialist for completeness and justification.
- Once approved, the packet is forwarded to the Director of Finance and the President of JTEC for final approval.
- Upon approval, the Career Consultant notifies the job seeker and training vendor, and reviews training policy and expectations with the job seeker.

Vendor Eligibility:

- All training providers must be approved through TrainingPro and appear in MOSES as part of the Eligible Training Provider List. If a vendor is not pre-approved, the Contract/Quality Assurance Specialist and the Career Consultant will facilitate the approval process before contract finalization.

(19) Please describe the process the Board uses, consistent with WIOA sec. 108(d), to provide up to 30-days public comment period prior to submission of the plan, including an opportunity to have input into the development of your local plan particularly for representatives of businesses, education, and labor organizations.

The CIWB posted the draft plan on its website for up to thirty (30) days for an opportunity for public input. Any comments submitted during the public review period that represent disagreement with the plan are resolved and submitted with the finalized document.

(20) Describe progress made implementing and transitioning to an integrated, technology-enabled intake, referral, and case management information system for WIOA Partner Shared Customers.

The MassHire CICC currently uses the MOSES system to intake and manage cases. Also, the MassHire CICC, in conjunction with the CIWB, developed a referral form that allows information sharing on shared customers across the workforce development system and its partners. The CIWB and its partners will support the state-wide efforts to develop a shared intake and case management system across partner agencies.

(21) Please describe the local policy and processes that ensure priority for adult career and training services are given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient consistent with WIOA sec. 134(c)(3)(E), § 680.600 and 100 DCS 18.101.1.

The Local Workforce Board may establish a process that extends priority for services to additional individuals, beyond those identified under WIOA, as long as it remains consistent with the priority of service for veterans.

Veterans and eligible spouses are given priority for employment, training, and placement services. This means they receive access to services before, or in cases of limited resources, instead of non-covered persons. Signage is posted at the point of entry encouraging veterans to self-identify, and information about priority of service is also included in the Career Center Seminar (CCS).

Recipients of public assistance are prioritized for training funds, as are other low-income individuals who qualify under WIOA guidelines.

(22) Please add any additional information or elements, as it pertains to your area and overall strategy, to align with the four Focus Areas outlined in the MA Workforce Agenda that may not have been addressed and responded to via the WIOA Sec 108 4-Year Plan requirements.

As we look ahead, the CIWB remains steadfast in its mission to cultivate a workforce system that is innovative, inclusive, and responsive to the evolving needs of our region. This Four-Year Plan outlines a strategic vision grounded in equity, collaboration, and economic opportunity – ensuring that all residents, regardless of background or barrier can access meaningful career pathways. Through continued partnership with employers, educators, community organizations, and government agencies we are building a workforce that is ready, resilient, and empowered – today and for generations to come.

Mass Workforce Issuance

100 DCS 08.116

☐ Policy ☒ Information

To: Chief Elected Officials
Workforce Development Board Chairs
Workforce Development Board Directors
Title I Administrators
Career Center Directors
Title I Fiscal Officers
DCS Operations Managers

cc: WIOA State Partners

From: Alice Sweeney, Director
Department of Career Services

Date: November 13, 2017

Subject: **DUA Employer Medical Assistance Contribution Supplement Listening Sessions**

Purpose: To notify Local Workforce Development Boards, One-Stop Career Center Operators, and other local workforce partners that The Department of Unemployment Assistance (DUA) is considering regulations for the Employer Medical Assistance Contribution Supplement that became law as part of *An Act Further Regulating Employer Contributions to Health Care* in August of 2017. The law temporarily changes the existing employer medical assistance contribution, creates a temporary supplemental contribution and modifies the unemployment insurance rate schedule. The updated contributions are effective for wages paid beginning January 1, 2018 and are time limited, expiring at the end of calendar year 2019. The modifications include:

- ☐ A decrease in the scheduled unemployment insurance experience rate
- ☐ A temporary increase in the existing Employer Medical Assistance Contribution (EMAC)
- ☐ A temporary supplemental contribution for employers with employees covered under MassHealth (the Massachusetts Medicaid program) or subsidized coverage through the ConnectorCare program

Background: In recent years, Massachusetts has seen a shift in health care coverage from employer-sponsored insurance to publicly-subsidized coverage, increasing the cost to taxpayers. Since 2011, commercial coverage declined by more than 450,000 individuals due to a variety of reasons including: rising commercial

health insurance costs; changes in employer sponsored insurance, implementing requirements associated with the Affordable Care Act (ACA); and regulatory landscape changes. During this same period of time, MassHealth enrollment increased by over 500,000 individuals, despite a stable population, low unemployment, and a high rate of health care coverage. The shift from commercial coverage to public coverage has contributed to significant growth in MassHealth spending.

The Administration has proposed a comprehensive package of reforms to attain a sustainable MassHealth program that are currently under review by the legislature. The time-limited increase in the Employer Medical Assistance Contribution and additional supplement will help to offset the costs for employees on subsidized coverage while longer-term reforms are established and implemented. The draft regulations are available online at:

https://www.mass.gov/files/documents/2017/11/06/Draft%20EMAC%20Supplement%20regulations%2011-6_0.pdf.

As part of the process, DUA welcomes interested members of the public to attend listening sessions on the following dates:

- When:** Monday, November 13, 2017 from **1:00 p.m. to 3:00 p.m.**
Where: Department of Unemployment Assistance Office
Charles F. Hurley Building 19 Staniford Street,
Minihan Hall, 6th floor Boston, MA 02114
- When:** Tuesday, November 14, 2017 from **10:00 a.m. to Noon**
Where: Department of Industrial Accidents Office
436 Dwight Street, Springfield, MA 01103
- When:** Wednesday, November 15, 2017 from **2:00 p.m. to 4:00 p.m.**
Where: Department of Industrial Accidents Office
340 Main Street 3rd floor, Worcester, MA 06108
- When:** Thursday, November 16, 2017 from **10:00 a.m. to Noon**
Where: Department of Transitional Assistance
280 Merrimack Street, Lawrence, MA 01843
- When:** Tuesday, November 28, 2017 from **11:00 a.m. to 1:00 p.m.**
Where: Cape Cod Community College
Lorusso Technology Building (upstairs solarium)
2240 Iyannough Road, West Barnstable, MA 02668

Comments may also be submitted to the following email address:
EMACSupplement@massmail.state.ma.us

Please note that photo identification is required of all persons entering the building.

Action

Requested: Please share with staff, partners, customers and employers as appropriate.



Workforce Issuance

100 DCS 08.105.1

☒ Policy ☐ Information

To: MassHire Workforce Board Chairs
MassHire Workforce Board Directors
MassHire Career Center Directors
MassHire Fiscal Officers
MDCS Operations Managers

cc: WIOA State Partners

From: Beth Goguen, Director
MassHire Department of Career Services

Date: March 11, 2025

Subject: **Migrant Seasonal Farmworker Requirements Under WIOA**

Purpose: To provide policy guidance and clarification to MassHire Workforce Boards (MWB), MassHire Career Center (MCC) operators and other workforce system partners on the responsibilities of serving Migrant and Seasonal Farmworkers (MSFW).

This policy has been revised to include the updated definition of Migrant Seasonal Farmworkers, ensuring consistency with recent training sessions and federal regulatory citations.

Background: The Workforce Innovation and Opportunity Act (WIOA) and Wagner-Peyser (W-P) regulations establish that each MassHire Career Center (MCC) must offer MSFWs the full range of career and supportive services, benefits and protections, and job and training referral services as are provided to non-MSFWs.

In providing such services, MCC offices must account for individual MSFW preferences, needs, skills, and the availability of job(s) and training opportunities, so that MSFWs are reasonably able to participate in services. This

includes ensuring that MSFWs have access to these services in a way that meets their unique needs.

MSFWs must receive services on a basis which is qualitatively equivalent and quantitatively proportionate to services provided to non-MSFWs.

Policy: MassHire Career Centers must determine whether participants and reportable individuals are MSFWs in accordance with the regulations (see Attachment A, Desk Reference) and ensure they are appropriately identified in MOSES (see Attachment B, MSFW and MOSES Data Collection).

MCCs will ensure that all MSFWs with limited English proficiency (LEP) receive, free of charge, the language assistance necessary to afford them meaningful access to available programs, services, and information.

Each MCC must provide MSFWs a list of available career and supportive services in their native language.

MCCs must refer and/or register MSFWs for services, as appropriate, if the MSFW is interested in obtaining such services. If or after referrals are made to other appropriate services, MCC staff must conduct follow-up and document the results in MOSES.

MCCs must make job order information visible and available to MSFWs by all reasonable means. Such information must, at a minimum, be available through web-based systems, posted at the MCC or in writing as needed. MCCs must provide adequate staff assistance to MSFWs to access job order information easily and efficiently.

MCCs must identify (in MOSES) MSFWs in accordance with 20 CFR 653.109 to then allow for career services data collection specified in WIOA Title I Sec. 134(c)(2)(A)(xii). (See Attachment B, Migrant and Seasonal Farm Worker Data Collection in MOSES).

MCCs are encouraged to provide activities to serve MSFWs and agricultural employers in their respective local areas to align with the population and labor market as described in the Local Annual Plan, ([MassWorkforce WIOA Local Plan Guidance Policy Issuances | Mass.gov](#)). To do so, MCCs may collaborate with MDCS outreach staff and local agricultural industry partners regarding the agricultural characteristics and specificities related to the MSFW local job market.

National Farmworker Jobs Program (NFJP) Partnership Requirements

In those local workforce areas where the grantee operates its NFJP, the grantee is a required partner of the local MassHire system. The grantee and the Local Board must negotiate as part of the local MOU, the provision of services and set forth their respective responsibilities for making the full range of services available through the MassHire system available to farmworkers.

In local areas where the NFJP grantee does not operate but there is a large concentration of MSFWs, the local Board and NFJP grantee may consider the availability of electronic connections and other means for participation in the workforce system in that area in order to serve those individuals.

Local MOUs must provide appropriate and equitable services to MSFW's and may include costs of services to MSFWs incurred by the career center(s) that extend beyond Wagner-Peyser funded services and activities.

Action

Required: Each local MassHire Workforce Board will ensure that MassHire Career Center staff are informed of the content of this issuance and ensure that MSFWs and agricultural employers receive the services, benefits and protections afforded to them by the WIOA and Wagner-Peyser requirements.

Effective: Immediately

Inquiries: Please email all questions to PolicyQA@mass.gov. Also, indicate Issuance number and description.

Attachments: A: MSFW Desk Reference
B: MSFW –Data Collection in MOSES

PROCUREMENT AND CONTRACTING

The Cape and the Island Workforce Board (CIWB) has adopted for operating purposes the following WIOA related policy 100 DCS 01.102 effective the date of issuance May 12, 2016.

Policy: Procurement and Contracting

Purpose: To enact policy regarding procurement and contracting requirements.

Background: The federal government has established standards for procurement and contracting to ensure that federally funded programs obtain goods and services in the most cost effective manner. These standards also ensure open and fair competition for all prospective providers.

Policy: This Policy outlines the requirements for procurement and contracting for all funds provided through the Department of Career Services (DCS), including, but not limited to, Workforce Innovation and Opportunity Act (WIOA). Attachments provide guidelines for developing and conducting solicitations, contracting and monitoring of contracts, and checklists for procurement and contract files.

Action

Those Governmental entities and other organizations subject to more restrictive state or local procurement thresholds and requirements, e.g., Massachusetts General Laws Chapter 30B, must comply with the more restrictive policy.

References: 2 CFR Part 200.317-200.326

MGL Chapter 30B

MGL Chapter 268A Massachusetts Conflict of Interest Law

Sections 8301-8303 of Title 41 (Buy American Act)

Environmental Protection Agency (EPA at 40 CFR Part 247)

6002 of the Solid Waste Act

Federal Acquisition Regulation (FAR) at 48 CFR Subpart 2.1

Wagner Peyser Act 29 U.S.C 49 et seq.

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PROCUREMENT

A. Introduction

When procuring property and services under a Federal award, a state must follow the same policies and procedures it uses for procurements from its non-Federal funds. The state will comply with §200.322 Procurement of recovered materials and ensure that every purchase order or other contract includes any clauses required by section §200.326 Contract provisions. All other non-Federal entities, including subrecipients of a state, must follow paragraphs (B) through (G) of this policy.

B. Procurement standards

Grantees and subgrantees must use their own procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this section.

Grantees and subgrantees must maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Grantees and subgrantees must maintain a written code of standards of conduct governing the performance of their employees engaged in the selection, award and administration of contracts. No employee, officer or agent of the grantee or subgrantee shall participate in any way (including discussion, review and/or voting) in the selection, or in the award or administration of a contract supported by Federal or State funds if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when:

The employee, officer or agent, Any member of his immediate family, His or her partner, or An organization which employs, or is about to employ, any of the above, has a financial or other interest in the firm selected for award. The grantee's or subgrantee's officers, employees or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to subagreements. Grantee and subgrantees may set minimum rules where the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value, based on the Commonwealth's Ethics Rules. To the extent permitted by State or local law or regulations, such standards or conduct will provide for penalties, sanctions, or other disciplinary actions for violations of such standards by the grantees and subgrantees, officers, employees, or agents, or by contractors or their agents. The awarding agency may in regulation provide additional prohibitions relative to real, apparent, or potential conflicts of interest.

In addition:

1. A State Board member or a Local Board member must neither cast a vote on, nor participate in any decision-making capacity, on the provision of services by such member (or any organization which that member directly represents), nor on any matter which would provide any direct financial benefit to that member or a member of his/her immediate family. Neither membership on the State Board, the Local Board nor the receipt of WIOA funds to provide training and related services, by itself, violates these conflict of interest provisions.

None of the funds made available under title I or II or under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) may be expended by a grantee or subgrantee unless the grantee or subgrantee agrees that in expending the funds the grantee or subgrantee will comply with sections 8301 through 8303 of title 41, United States Code (commonly known as the “Buy American Act”).

Grantee and subgrantee procedures will provide for a review of proposed procurements to avoid purchase of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

To foster greater economy and efficiency, grantees and subgrantees are encouraged to enter into State and local intergovernmental agreements for procurement or use of common goods and services.

Grantees and subgrantees are encouraged to use Federal excess/surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

Grantees and subgrantees are encouraged to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

Grantees and subgrantees will make awards only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

(10) Grantees and subgrantees will maintain records sufficient to detail the significant history of a procurement. These records will include, but are not necessarily limited to, the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

(11) Grantees and subgrantees will use time and material type contracts only--
After a determination that no other contract is suitable, and
If the contract includes a ceiling price that the contractor exceeds at its own risk.

(12) Grantees and subgrantees alone will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the grantee or subgrantee of any contractual responsibilities under its contracts. Violations of law will be referred to the local, State, or Federal authority having proper jurisdiction.

(13) Grantees and subgrantees will have protest procedures to handle and resolve disputes relating to their procurements and shall in all instances disclose information regarding the protest

to the awarding agency. A protestor must exhaust all administrative remedies with the grantee and subgrantee before pursuing a protest with the state or Federal agency. Reviews of protests by the Federal agency will be limited to:

Violations of Federal law or regulations and the standards of 2CFR Part 200.317 (violations of State or local law will be under the jurisdiction of State or local authorities) and

Violations of the grantee's or subgrantee's protest procedures for failure to review a complaint or protest. Protests received by the Federal agency other than those specified above will be referred to the grantee or subgrantee.

C. Competition

The Procuring Entity must establish procurement procedures which promote and maximize the competitive procurement process. At a minimum, the procurement process must:

1. appropriately target resources based on approved job training plans;
2. be made impartially and at "arms-length";
3. be based upon demonstrated performance;
4. include a determination of cost/price reasonableness;
5. be in compliance with all related federal and state laws, regulations and policy.

All procurement transactions will be conducted in a manner providing full and open competition consistent with the standards of §200.319. Some of the situations considered to be restrictive of competition include but are not limited to:

i. Placing unreasonable requirements on firms in order for them to qualify to do business, ii.

Requiring unnecessary experience and excessive bonding,

iii. Noncompetitive pricing practices between firms or between affiliated companies,

iv. Noncompetitive awards to consultants that are on retainer contracts,

v. Organizational conflicts of interest,

Specifying only a "brand name" product instead of allowing an "equal" product to be offered and describing the performance of other relevant requirements of the procurement, and Any arbitrary action in the procurement process.

Grantees and subgrantees will conduct procurements in a manner that prohibits the use of statutorily or administratively imposed in-State or local geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference.

Grantees will have written selection procedures for procurement transactions. These procedures will ensure that all formal solicitations: Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured, and when necessary, shall set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product

specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equal” description may be used as a means to define the performance or other salient requirements of a procurement. The specific features of the named brand which must be met by offerors shall be clearly stated; and Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

Grantees and subgrantees will ensure that all pre-qualified lists of persons, firms, or products which are used in acquiring goods and services are current and include sufficient qualified sources to ensure maximum open and free competition. Also, grantees and subgrantees will not preclude potential bidders from qualifying during the solicitation period.

D. Methods of procurement to be followed—

The method of procurement to be followed is dependent on the threshold levels as listed below. The non-Federal entity must use one of the following methods of procurement.

Threshold Levels

NOTE: Governmental entities and other organizations subject to more restrictive state or local procurement thresholds and requirements, e.g., MGL Chapter 30B, must comply with the more restrictive policy.

a. Goods and services \$3,500 or less (Micro-purchase)

Procurement within this threshold is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (\$3,500). To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.

b. Goods and services \$3,501 to \$150,000 (Small Purchase)

For Procurements within this threshold, small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold (\$150,000). The Procuring Entity’s written procedural guidance must ensure documentation of **price or rate quotes**, procurement method and justification for the selection from among an adequate number of competitive providers.

c. Goods and services above \$150,000 (Simplified Acquisition Threshold)

Procurements at this threshold level are subject to **formal bid/proposal solicitation** requirements.

I. Competitive Procurement

Procurement transactions should be conducted to ensure adequate competition and reasonable price. Non-competitive procurement should be used only in the circumstances outlined below in Section II, Non-Competitive Procurement.

Procurement by Micro-purchase procedures. Micro-purchase procedures is the purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold (\$3,500). Micro-purchase procedures comprise a subset of a grantee's and subgrantee's small purchase procedures. The grantee and subgrantee uses such procedures in order to expedite the completion of its lowest-dollar small purchase transactions and minimize the associated administrative burden and cost. The micro-purchase threshold is set by the Federal Acquisition Regulation (FAR) at 48 CFR Subpart 2.1. It is \$3,500 except as otherwise discussed in Subpart 2.1 of that regulation, but this threshold is periodically adjusted for inflation.

Procurement by small purchase procedures. Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold set by the Federal acquisition Regulation (FAR) at 48 CFR Subpart 2.1 (currently set at \$150,000). If small purchase procedures are used, price or rate quotations shall be obtained from an adequate number of qualified sources.

Procurement by sealed bids (formal advertising). Bids are publicly solicited and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction, if the conditions in paragraph (i) of this section apply.

(i) In order for sealed bidding to be feasible, the following conditions should be present:

(A) A complete, adequate, and realistic specification or purchase description is available; (B) Two or more responsible bidders are willing and able to compete effectively and for the business; and

(C) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

(ii) If sealed bids are used, the following requirements apply:

The invitation for bids will be publicly advertised and bids shall be solicited from an adequate number of known suppliers, providing them sufficient time prior to the date set for opening the bids;

The invitation for bids, which will include any specifications and pertinent attachments, shall define the items or services in order for the bidder to properly respond; (C) All bids will be publicly opened at the time and place prescribed in the invitation for bids;

(D) A firm fixed-price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and (E) Any or all bids may be rejected if there is a sound documented reason.

Procurement by competitive proposals (e.g., Request for Proposals). The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract is awarded. It is generally used when

conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply: (i) Requests for proposals will be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals shall be honored to the maximum extent practical;

Proposals will be solicited from an adequate number of qualified sources;

Grantees and subgrantees will have a method for conducting technical evaluations of the proposals received and for selecting awardees;

Awards will be made to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and

Grantees and subgrantees may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

Request for Qualifications. The process of a Request for Qualifications is a two part. First, a formal solicitation is issued to obtain submissions from contractors. These submissions are then reviewed and a list of contractors qualified to provide the goods or services required is developed. The second stage of the process is the comparison of two or more qualified providers to determine which will be chosen to provide the goods or services.

Individual Training Accounts. The process of choosing a provider to train a participant through an Individual Training Account is an exception to the RFQ process. Please refer to Policy 100 DCS 14.100 Massachusetts Eligible Training Provider List (MA ETPL) Initial and Subsequent Eligibility Process” located on MassWorkforce.org:

<http://www.mass.gov/massworkforce/issuances/wioapolicy/14-training/>

II. Non-Competitive Procurement

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate. (i) Procurement by noncompetitive proposals may be used **only** when the award of a contract is infeasible under small purchase procedures, sealed bids or competitive proposals **and** one of the following circumstances applies:

- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- The awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request; or
- After solicitation of a number of sources, competition is determined to be inadequate or a failed competition, where the solicitation has resulted in fewer than two responsive and responsible bids.

When a Procuring Entity conducts a formal solicitation process and receives only one qualified proposal, the award process must be justified and documented. A Failed Competition Analysis must be performed.

Failed Competition Analysis

Program Operators/Service Providers should address the following questions:

- Was there a weakness in the solicitation specifications?
- Was the statement of work clear?
- Was the statement of work too narrowly defined?
- Were the administrative requirements too cumbersome?
- Was there an excessive amount of experience required?
- Was the cost the entity was willing to pay too low?
- Was there adequate time to prepare proposals?
- Was the solicitation advertised in an adequate number of locations?
- Are the services/training being sought really only available from one offeror?

Prior to awarding the contract, the procuring entity must address these issues and document that the process was not flawed and that in fact only one vendor can provide the services being sought, a cost/price benefit analysis must be completed prior to awarding the contract.

Prior written approval by DCS must be obtained for any actual sole source or emergency/exigency award which is in excess of \$150,000. All such awards must be justified and documented. Requests for approval must include the following information:

- copy of the offerors proposal
- copy of the cost/price analysis
- copy of related WDB meeting discussion minutes
- copy of the non-competitive/award justification
- cover letter requesting approval
- failed competition analysis

Such awards will not be approved retroactively.

Although such awards in an amount below \$150,000 need not be submitted to DCS for approval, procuring entity must internally document and justify these awards below this level.

Such procurements which initially do not require DCS approval, but which are to be modified to an amount which exceeds \$150,000, must be submitted for DCS approval prior to the execution of the modification.

Failure to obtain required **prior** approvals may result in questioned costs.

Frequency of Solicitations

Solicitation shall occur at a minimum every two years to promote and encourage competition. Solicitation of Audit services shall occur at a minimum of every five years. **Multi-year funding** of contractors must be consistent with the conditions of the approved RFP and award. In addition, subsequent year funding is to be retained as the option of the procuring entity only and must be subject to successful performance and formal, documented contract negotiations.

E. Authority to Take Procurement Actions

The procurement policy and procedural guidance must identify the positions of individuals in the organization that have the authority to:

- Allocate funds to procure services
- Approve procurement plans
- Approve non-competitive and sole-source procurements
- Approve the issuance of the solicitation package
- Approve the selection of contractors or service providers
- Sign contracts (the policy must include appropriate certification by the municipality or Board of Directors that this individual has legal authority to sign contracts and must be consistent with the signatory on file at DCS)
- Approve and sign contract modifications
- Issue notices of contract termination

Where individuals of the procuring entity have joint responsibility to approve contract actions, the procurement policy must delineate and describe respective roles and authority. Authorizations should be reviewed on an annual basis and revised, if necessary.

F. Procurement Documentation

Procuring Entity Procuring entity policy and written procedural guidance shall require the maintenance of organized and centralized procurement files. Procedures shall require files to contain sufficient documentation to track the significant history of each procurement. Files shall contain all documentation related to that procurement including, but not limited to: procurement planning records, the solicitation, notices of public advertisement, bidder's conference minutes, all proposals submitted with records of their receipt, all proposal evaluation documentation (including sign-off and certifications), all proposal negotiation documentation, and all related meeting/committee minutes to document the contract(s) review, evaluation and award. A Sample Procurement File Checklist is contained in Attachment A.

G. Federal Awarding Agency or DCS Review

The grantee must make available, upon request of the Federal awarding agency or DCS, technical specifications on proposed procurements where the Federal awarding agency or pass-through entity believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition. This review generally will take place prior to the time the

specification is incorporated into a solicitation document. However, if the grantee desires to have the review accomplished after a solicitation has been developed, the Federal awarding agency or DCS may still review the specifications, with such review usually limited to the technical aspects of the proposed purchase.

The grantee must make available upon request, for the Federal awarding agency or DCS preprocurement review, procurement documents, such as requests for proposals or invitations for bids, or independent cost estimates, when:

The grantee's procurement procedures or operation fails to comply with the procurement standards in this part;

The procurement is expected to exceed the Simplified Acquisition Threshold and is to be awarded without competition or only one bid or offer is received in response to a solicitation;

The procurement, which is expected to exceed the Simplified Acquisition threshold specifies a "brand name" product;

The proposed contract is more than the Simplified Acquisition Threshold and is to be awarded to other than the apparent low bidder under a sealed bid procurement; or

A proposed contract modification changes the scope of a contract or increases the contract amount by more than the Simplified Acquisition Threshold.

The grantee is exempt from the pre-procurement review in paragraph (b) of this section if the Federal awarding agency or DCS determines that its procurement systems comply with the standards of this part.

The grantee may request that its procurement system be reviewed by the Federal awarding agency or DCS to determine whether its system meets these standards in order for its system to be certified. Generally, these reviews must occur where there is continuous high-dollar funding, and third party contracts are awarded on a regular basis.

The grantee may self-certify its procurement system. Such self-certification must not limit the Federal awarding agency's right to survey the system. Under a self-certification procedure, the Federal awarding agency may rely on written assurances from the grantee that it is complying with these standards. The grantee must cite specific policies, procedures, regulations or standards as being in compliance with these requirements and have its system available for review.

CONTRACTING

A. Contracting with small and minority firms, women's business enterprises and labor surplus area firms

The grantee and subgrantee will take all necessary affirmative steps to assure that minority firms, women's business enterprises, and labor surplus area firms are used when possible.

Affirmative steps shall include:

Placing qualified small and minority businesses and women's business enterprises on solicitation lists;

Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;

Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority business, and women's business enterprises;

Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises;

Using the services and assistance of the Small Business Administration, and the Minority Business Development Agency of the Department of Commerce; and

Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in this section.

B. Procurement of recovered materials

The grantee and subgrantee that is a state agency or agency of a political subdivision of a state and its contractors must comply with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired during the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

C. Contract cost and price

Grantees and subgrantees must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition threshold, including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, grantees **must** make independent estimates **before** receiving bids or proposals. A cost analysis must be performed when the offeror is required to submit the elements of its estimated cost, e.g., under professional, consulting, and architectural engineering services contracts, or whenever a line item budget is submitted. A price analysis will be used in all other instances to determine the reasonableness of the proposed contract price.

Grantees and subgrantees will negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration will be given to the complexity of the work

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

Costs or prices based on estimated costs for contracts under grants will be allowable only to the extent that costs incurred or cost estimates included in negotiated prices are consistent with Federal cost principles.

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

All procurement contracts between Local Boards and units of State or local governments must be conducted on a cost reimbursement basis. No provision for profit is allowed.

D. Awarding agency review

DCS will review each WDB/Program Operator's procurement system during the annual monitoring and at other times as it deems necessary to determine whether the system meets these standards in order for the system to be certified. For construction or facility improvements, DCS prior approval must be obtained.

PROCUREMENT FILE CHECKLIST

Solicitation Name/Type: _____ Total Funding:
\$ _____

Funding Source: _____ Funding Period: _____

_____ Procurement Planning Records (meeting minutes, etc.)

_____ Copy of Solicitation Document (RFP, RFQ, IFB)

_____ Original Public Notice(s)/Ad(s) (tear sheets)

_____ Copy of Solicitation Mailing List(s)

_____ List of Entities which requested a proposal

_____ Records of Bidders Conference Attendance

_____ Minutes from Bidders Conference

_____ Copy(s) of Q & A's sent to proposers

- _____ Copy(s) of amendments to solicitation
- _____ Log of proposals submitted
- _____ Copies of proposals submitted (with date stamp & time)
- _____ Minutes of Review team/committee meeting(s)
- _____ Signed proposal rating sheets
- _____ Cost/Price analysis documentation
- _____ Signed review team non-conflict statements
- _____ Written recommendations of review team/committee
- _____ Documentation of proposal/contract negotiation(s)
- _____ Amended/Last and Final Proposals
- _____ Misc. proposal clarification documents/correspondence
- _____ Minutes of Award/Selection meetings and votes
- _____ Copies of Approval/Award/Rejection letters
- _____ Required certifications (debarment & suspension, etc.)

CONTRACT FILE CHECKLIST

Contract Name: _____

Contractor: _____

Contract Number: _____ Contract Amount: \$ _____

Contract Period: _____

Funding Source: _____

_____ Signed/Executed copy of the contract

_____ Signed copy(s) of subsequent contract modifications

- _____ Contract/Mod. cost/price analysis & justification
- _____ Proposal or other documents incorporated by reference
- _____ Required certifications (debarment & suspension, etc.)
- _____ Pre-award surveys or other review data
- _____ Copy(s) of contract negotiation data
- _____ Subcontract/sub-agreement approval documentation
- _____ Copy(s) of required insurance/bonds
- _____ Copy(s) of Agency/Contractor correspondence
- _____ Monitoring Reports/Corrective Actions/Follow-up documents
- _____ Invoice/billing records of payment
- _____ Records of cash advances/on-hand and liquidation of funds
- _____ Property/Equipment acquisition and disposition records
- _____ Documentation of Termination actions
- _____ Contractor report(s) of deliverables provided
- _____ Contract Close-out/Cash settlement/Program Income Reports
- _____ Copies of required audit reports/review & resolution

GUIDANCE ON DEVELOPMENT OF FORMAL SOLICITATIONS AND THE STATEMENT OF WORK (SOW)

This Attachment contains information on the development of formal solicitations and the statement of work. WDBs/Program Operators may utilize this in lieu of developing their own procedures.

A. SOLICITATIONS

The solicitation is the document that the Procuring Entity issues to elicit offers from proposers or bidders. The formal solicitation (RFQ, IFB, RFP) is the document that invites offers from potential service providers.

I. Request For Qualifications (RFQ)

In an RFQ process, proposals are solicited from qualified sources by formally advertising in local newspapers and sending out the RFQ to the potential contractors/service providers selected from the inventory of providers. Proposals are received, evaluated and those potential providers who qualify are placed on the approved providers' list. To be accepted as a viable procurement vehicle, all provider lists must be current and include a sufficient number of qualified sources. Services are then selected utilizing a specific rationale (price comparison, demonstrated performance, etc.) established for final selection from the approved contractor list (see Competitive Procurement). This is an acceptable method for the procurement of Individual Training Services.

If the Procuring Entity finds that it did not necessarily reach all potential offerors, it may send out the RFQ specifications to other potential providers after the providers' list has been established and augment the list if subsequent providers meet the same evaluation criteria.

1. Notice of Request for Qualifications

The notice should, at a minimum, briefly summarize all important information regarding the RFQ including:

- ◆ Name and address of entity issuing the RFQ;
- ◆ Name, address, title and phone number of person to contact regarding questions;
- ◆ How to obtain the RFQ Specifications;
- ◆ Response due date and time deadlines;
- ◆ Number of copies of response;
- ◆ Period for which services are sought (could be Program Year);
- ◆ Specify location and method of delivery of response;
- ◆ Other stipulations and clarifications as required;
- ◆ Statement concerning Equal Opportunity Employer; and
- ◆ Description of provider's organization and type of services generally provided.

2. RFQ Specifications

a. Introductory Information

The RFQ package may include an introductory section covering general explanatory information to clarify any special points or items of interest. For example, this section could be used to discuss providers' conference meeting plans, procedures and general information on evaluation of proposals, how contractors will get on the approved providers' list, etc.

b. Nature of the Services Being Sought

This section should describe the services being requested. While a single provider may offer a range of courses, it is not likely to be equally competitive in each, particularly in terms of demonstrated performance. Each program offered by the provider should be evaluated separately.

c. Cost

Potential service providers/contractors should submit a cost which is non-rescindable. Potential service providers who do not have an “off-the-shelf” price must submit a line item cost basis for the training which includes training, any related costs in providing the training and overhead costs.

Potential contractors may submit an "off-the-shelf"/tuition based single unit charge for services if the services are sold to the general public in the course of normal business operations and the cost is a single charge for tuition. The price should be published in a catalog or price list describing the course.

d. Technical Proposal

Offerors who submit proposals which are not "off-the-shelf"/tuition based single unit charges should be required to provide the following information:

Their qualifications to provide the services,

A description of their background and experience with the services for which bids are being provided,

Information as to the size and structure of the offeror's organization,

Positive affirmations that offeror has all the required licenses to perform the services being sought,

Offerors should provide a statement of their understanding of the services to be provided, including time and cost, and

A statement of their refund policy.

e. Evaluation of Qualifying Proposals

WDBs/Program Operators/Service Providers must include criteria for offerors to be placed on the providers’ list. Such criteria should include, but are not limited to the following:

Offeror’s qualifications and experience in providing the services/training

Frequency of training/services offered

Demonstrated performance

Cost/Price

Additional Criteria Suggested:

Geographic Location(s), including a description of public transportation, if available 6) Size of firm/capacity

WDBs/Program Operators/Service Providers should describe the process of notification to successful and unsuccessful offerors, should also inform successful offerors that while they may have been placed on the providers’ list, they will not automatically be awarded contracts when the need arises. The RFQ should contain the selection procedures of the Procuring Entity will be utilized prior to the final negotiation/award of contracts.

f. Rationale for Final Service Selection

Written procedures should include Procuring Entity rationale, justification and documentation of final selection. This rationale must be consistently applied in the selection of each service/good

selected from the list. At a minimum, each final individual selection must consider and document price comparison and demonstrated performance. Additional factors for consideration may be indicated. To the extent that any additional considerations enter into source selection, their application should be documented.

II. Invitation for Bids (IFB)

Sealed bids (Formal Advertising) are publicly solicited and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is lowest in price. When this method is used the solicitation is called an Invitation for Bids (IFB). In this method the contracting agency awards the contract to the responsible offeror whose bid is most advantageous considering only price and price-related factors.

Content of IFB

1. Notice of Proposal

The Notice of Proposal should briefly summarize all important information regarding the IFB. It should include:

Name and address of entity issuing the IFB

Name, address, title and phone number of person to contact regarding questions

Period for which services will be provided (Clarify if multi-year proposal)

Other stipulations and clarifications as required

Statement about equal opportunity employer

How the entity is organized and what kind of services the entity generally provides

Response due date and time deadlines with consequences of late responses

Number of copies of response required

Specific location and method of delivery of response

Public opening of all bids at a published date and time

2. Introductory Information

The IFB package may include an introductory section covering general explanatory information to clarify any special points or items of interest. For example, this section could be used to discuss bidder's conference meeting plans and procedures and general information on the evaluation of proposals and the bid opening procedures.

3. Nature of the Services Required/Statement of Work

This section should describe the services being requested and how those services are to be provided (times and dates). This is explained in more detail in the section on the statement of work.

4. Cost/Budget

WDBs/Program Operators should include in the IFB a standard budget format with detailed support for each line item.

5. Technical Proposal

Offerors should be required to provide the following information:

Their qualifications to provide the services

A description of their background and experience with the services being sought

Resumes of those staff who will provide services

Information as to the size and organization of the offeror's firm

A statement of their financial capabilities

A copy of their most recently completed audit

Positive affirmations that offeror has all the required licenses to perform the services being sought

A statement of their understanding of the services to be provided, including time and cost.

6. Evaluation of Proposals

WDBs/Program Operators should include information in the IFB concerning the factors to be used in evaluating proposals and the process for notifying offerors as to the final outcome.

CIWBs/Program Operators have the option of including who will review the proposals and the actual weights of the review criteria, if desired.

III. Request for Proposals (RFP)

The WDB/Program Operator should ensure that RFPs include:

Statement of Work or Specifications. The Statement of Work (SOW) is the document that clearly describes the services that are being acquired. (SOW requirements are addressed later in this document).

A description of the requirements for time, place and methods or performance of services.

This will be included within the SOW, however, it is beneficial to state these requirements in a separate section to summarize the work to be completed with dates and places for delivery of services.

Contract clauses that will be included in any resulting contract. Standard "boilerplate" clauses should be made available to bidders. This may be accomplished by inclusion in the RFP or by information to the bidders that the boilerplate is available for review at the WDB/Program Operator.

Assurances, certifications and representations. Any assurances, certifications and representations that the bidder will be required to execute should be included in the RFP, and may require a statement from the offerors that they will comply with any regulatory requirement established by the funding source.

Detailed information on how to prepare and submit the proposal. The RFP should provide clear direction on the proposal format; the number of copies to submit; the location where the proposal should be submitted and the submission closure time and date. The RFP should also establish any minimum responsiveness requirements that must be met for a proposal to be considered.

Description of how price or cost will be utilized as a factor affecting proposal awards decisions.

Criteria and evaluation developed to review proposals for award decisions. The RFP should include a description of the criteria and evaluation to be utilized.

Solicitation provisions. The RFP should clearly state the provisions that govern the solicitation process and clearly describe how the procurement process will be managed. For example, this may include logging in of proposals, expected time frame for notification of award/non award and what appeals process is available to bidders, time frames and levels of in-house and WDB committee reviews; when the full WDB will review and vote on recommendations; etc. The RFP may also include a description of the process which will be followed if the RFP is amended, e.g., if the Bidder's conference results in clarification needed or if changes/decisions are made which affect the services being procured.

Budget Instructions. The RFP should request a full line item budget which identifies the basis for all costs by cost category, and should provide detailed instructions as to what constitutes a complete budget. A budget narrative should also be required.

Summary or cover sheet. The RFP may request a summary or cover sheet.

Other. The RFP should also include:

Reservation of the Procuring Entity's right to reject any or all proposals.

Statement of the proposer's rights of protest and appeal.

If a competitive range or other narrowing of offerors is to be used, the decision criteria, which may include a minimum threshold, should be described.

Information regarding whether amended or "best and final" proposals will be requested and evaluated.

B. STATEMENT OF WORK

The Statement of Work (SOW) is the section of the solicitation (RFQ, IFB, RFP) that specifically describes the scope of work; the materials necessary to complete the work and the services to be procured. A well-structured SOW will serve as the framework of the contract.

The SOW should include:

Background Information. The solicitation should include information on:

the audience for which this solicitation is being prepared

funding source and authorization

Procuring Entity implementation and responsibilities

information on previous WDB/Program Operator/Program Operator sponsored training programs definitions/terminology

references to WDB plans; labor market surveys and any other relevant background.

Purpose. The solicitation should include information on the overall program objectives (and their relationship to this solicitation); the purpose of the contract (what services are being procured); and the target groups the program will serve. Focus should be on outcomes, allowing flexibility on how to achieve the goals.

General Responsibilities. The SOW should include requirements for information on management, staffing and the direction of programs; location and facilities; hours of operation; coordination with the WDB/Program Operator; administrative procedures; component budget; and, if applicable, minimum staff qualifications.

Demonstrated Performance. The solicitation should require the offeror to document its record of demonstrated performance in the past delivery of employment & training or related services.

Services to be Performed. The solicitation should be very specific in describing the services to be performed, carefully identifying what is to be accomplished as opposed to how it should be accomplished. When procuring for employment and training services, this section should identify which career services, and training services are being sought.

Standards of Performance. This section identifies how well the offeror must perform, including criteria to determine satisfactory performance. This section should reference: program outreach; recruitment goals (e.g., target groups); intake; program design standards; and program performance outcome standards.

Administrative Requirements. This section specifies what specific actions must be taken to comply with Federal, State and Local regulations, policies and procedures. At a minimum, this section should include: requirements for maintenance of applicant/participant records; fiscal management and reporting; program status records and reports; a list of any Procuring Entity furnished property or space; allowability of subcontracting; grievance procedures; and performance and submission of single audits by public/nonprofit organizations awarded contracts within 9 months of the end of the program, if applicable. Financial risk assessment procedures for each applicant prior to award as required by Federal Regulations 2 CFR 200.205.

Exhibits. This section should include any materials to be provided to offeror as exhibits. These exhibits may include, but are not limited to: standard forms and reports; standardized procedures; maps and flow diagrams; proposal evaluation format; and organizational charts.

D. REVIEW/EVALUATION OF SOLICITATIONS

The WDB/Program Operator should have written procedures which:

Contain a description of the procedures used to review proposals and select contractors, including:

The application of the technical rating criteria and evaluation factors contained in the solicitation;

Identification of what type of staff or others who will review and score or rate technical proposals;

The roles of staff in the review of proposals, including how and when these roles are to be executed.

Describe the procedures for conducting and documenting cost and price analysis.

Specify that for all procurements, a procurement file be developed that documents all actions up to and including the awarding of contracts, including required file content.

Include a method for allowing and evaluating offerors' protests of contract awards and/or other aspects of the procurement process.

Describe the appeal/protest process, including the:

name of the individual with whom the protest must be filed

time limits for the filing of protests

procedure for the handling of protests

nature of offeror's appeal rights, including appeal of the WDB/Program Operator decision to the state funding agency.

E. RECEIPT OF PROPOSALS

A log of incoming proposals should be kept which contains the name of the offeror, and the date and time of receipt of proposals. The log should not be visible to offerors who hand-deliver their proposals. Names and the number of offerors submitting proposals is confidential until the solicitation process has been completed. Incoming proposals should also be dated stamped. If proposals are late and it has been specified in the solicitation that late submissions will not be accepted, the proposals should still be logged in and then returned to the offeror specifying that the requirements of the solicitation were not satisfied.

Proposals should be opened and the content of proposals reviewed at a specified time and place. If the solicitation specified that incomplete submissions will constitute a non-responsive proposal, then this procedure is critical. A checklist should be developed to review proposals for completeness, utilizing the solicitation specifications.

All proposers should be treated equally. If one proposal is rejected for incompleteness, then all other proposals which were not complete must be rejected.

F. TECHNICAL EVALUATION

Consideration should be given based upon demonstrated performance in the delivery of comparable services, in terms of the likelihood of meeting performance goals, cost, quality of training, the characteristics of the clients, and consideration to demonstrated performance in making appropriate supportive services and child care available.

1. Minimal Evaluation Factors

Criteria tailored to the specific solicitation requirements should be developed. Cost/price should be included. Other factors which can be included are:

Cost Realism (Can the services and the performance goals be delivered for the budgeted cost?)

Time Table (Can the services and performance goals be met in the projected time table?) c)

Technical Content

Management/Fiscal Capability

Qualifications of staff assigned to the project
Experience in delivering comparable services
Demonstrated Performance
Anything else the agency deems important in making its decision.

The solicitation must specify the criteria that will be used in evaluating proposals. While it does not have to specify the weight of each criteria, it should discuss their relative importance.

2. Rating the Proposals

Factors for rating proposals, whether numerical or qualitative, must ultimately be weighted by total points. In general, the relative weight of criteria should be consistent with the goals of the annual plan or proposal. Rating sheets should direct the reviewer to the relevant sections of the solicitation which is the basis for assignment of points. Rating standards should be constructed in a graduated fashion to prevent an all or nothing decision for a particular criteria. Establishing pass/fail standards such as weeks of training, cost per participant, etc., weakens the impartiality, competitiveness, and cost reasonableness of the process.

3. Proposal Evaluation Conduct

In assigning review membership, it should be clear that **all members are expected to read all competing proposals**. Sections of proposals should not be subdivided among different committees. Rating sheets should be completely filled out, signed and certified (no conflicts) by the reviewers. The rating sheets should be retained in the procurement file as an audit trail supporting the reliability, objectivity and impartiality of the review process.

The ratings should be summarized and aggregated. The results of the evaluation should then be forwarded in writing by the chair of the committee to the next level of review. Documented minutes should be maintained.

If multiple levels of review occur, the results of each should be separately recorded and documented.

4. Contract Price and Cost Analysis, Independent Estimates, Cost Classification

Contracts must be awarded to the offeror that presents the best services at the most favorable price. Price and cost analysis also demonstrate the offeror's understanding of the services to be provided and their commitment of the needed resources to get the work done. Such analysis is usually separate from program analysis.

A cost or price analysis must be performed in connection with every procurement action in excess of the Simplified Acquisition Threshold (\$150,000), including contract modifications. Each offeror should be required to certify that to the best of its knowledge and belief, the cost data is accurate, complete, and current at the time of agreement on price.

a. Price Analysis

Price analysis is the process of examining and evaluating a price without looking at the cost elements and the proposed profit of the offeror. This involves:
Comparison of competitive price quotations.

Appropriate comparison of historical or current prices for similar items which have been competitively procured or formally determined as reasonable based on price and/or cost analysis. Appropriate use of measures to point out differences such as price per training hour, price per slot or price per placement among essentially similar services.

Appropriate comparisons of prices on published price lists with published market prices together with discount or rebate schedules.

Comparison of proposed prices with independent estimates (see above) developed by the contracting entity.

b. Cost Analysis

Cost analysis is the review and evaluation, element by element of the line item budget included in the proposals to establish the reasonableness of proposed costs. Cost analysis is not always necessary. It is used to establish the basis for negotiating a contract price where price comparison is not adequate or is lacking altogether or where price analysis does not ensure the reasonableness of prices.

Elements of Cost Analysis

All offerors should be required to submit a detailed line item budget. Offerors should be required to also submit a narrative describing the assumptions and rationale for arriving at these cost estimates.

Reviewers must then verify the cost and pricing data and evaluate them by:

Judging whether costs are reasonable.

Evaluating the cost trends on the basis of current or historical cost data.

Conducting an appraisal of the estimated labor, materials, etc.

Evaluating negotiated or federally audited rates, if indirect charges are included. In conducting such a review, reviewers may reference federal indirect cost rate circulars. Some universities have approved indirect cost rates which may be based upon research or other grant data and would not necessarily apply in the realm of employment and training grants. The rate basis should be clear.

Reviewers should also compare costs proposed with any other data available including what the offeror proposed in the past, has delivered or is delivering now, and other proposals.

Reviewers should also verify that the proposed costs are in accordance with applicable cost limitations. For instance, if the solicitation states that administration or indirect costs may not exceed 10 percent, then all proposals must be reviewed for compliance with this requirement.

c. Independent Estimates

The method and degree of analysis depends on the facts surrounding the particular procurement and pricing situation, but at a minimum, the awarding agency should make independent estimates before receiving bids or proposals. WDBs/Program Operators/Service Providers must develop independent estimates of the cost elements of the service(s) utilizing budget line item costs and prices developed from past experience, contractor financial reports, etc., to estimate what the likely costs and price of the procurement will be. This provides a yardstick for the comparison of the costs and prices of an offeror. Estimates may be developed in the form of acceptable ranges for price and cost elements to be measured against the bases of cost/price data during proposal review.

d. Classification of Costs

WDBs/Program Operators/Service Providers should require offerors to submit proposals utilizing the appropriate cost categories so that a determination may be made whether costs comply with cost limitations and whether costs are properly classified, if necessary.

The reviewers must be certain that offerors do not include the same services as both direct and joint/indirect charges. If possible, costs should be budgeted as direct charges. If the offeror has budgeted indirect charges, the rate must be one approved by a cognizant federal agency or based upon a written cost allocation plan approved by the Procuring Entity. Further, the Procuring Entity is not required to allow the offeror an approved rate if sufficient funds are not available or if the administrative cost limitation would be exceeded.

Awards to subrecipients or contractors that are solely for the performance of administrative functions are classified as administrative costs. Personnel and related non-personnel costs of staff that perform both administrative functions as defined in the applicable and programmatic services or activities must be allocated as administrative or program costs to the benefiting cost objectives/categories based on documented distributions of actual time worked or other equitable cost allocation methods. Except for awards that are solely for the performance of administrative functions, all costs incurred for functions and activities of subrecipients and contractors are program costs.

e. Analyzing Proposed Costs

Reviewers need to know the basis for the estimated costs, whether historical data, quotes, catalogs or price data was used. Reviewers also need to determine if proposed resources are sufficient, though not excessive, to achieve objectives, including reasonableness of staffing patterns and salary rates. Finally, reviewers must verify that costs will not violate laws, regulations and policy and solicitation requirements and restrictions. Costs must be necessary and reasonable.

f. Documenting Conclusions and Concerns

Reviewers must document their conclusions and concerns, including the cost analysis, particularly if the Procuring Entity intends to negotiate with the offeror. Documentation is critical if offeror protests are filed and is helpful in the monitoring and administration of the contract.

g. Analysis Of Specific Costs

Each element of cost should be reviewed separately to determine whether it is reasonable and necessary. For example, staffing costs should be reviewed to determine if the staffing pattern and number of staff are appropriate, whether the compensation is appropriate, etc. For all items, reviewers must determine if the proposal is including a fair share of the costs, and whether there is a less costly way of providing the same services. For equipment, lease versus purchase should be considered. WDBs/Program Operators/Service Providers need not allow the purchase of equipment. The reviewer needs to analyze the client supportive services proposed to verify whether those costs are necessary to enable eligible clients to participate in the training.

Subcontracts

When an offeror includes a subcontract, it should be clearly identified, described and justified. The reviewer needs to perform price and cost analysis of subcontracts as well. The reviewer should analyze how the prime offeror will monitor subcontracts, review reports, etc.

Indirect costs

As stated above, in some cases, the RFP may permit offerors to include indirect costs. These costs must conform to state and local guidelines. The reviewer needs to analyze these costs to ensure that the charges included in the rate are not duplicated in the direct charges. If the indirect rate is not an audited or federally approved one, a cost allocation plan should be submitted by the offeror. The reviewer needs to ascertain whether this contract can support the rate and whether it is appropriate for the proposed services.

Profit, Program Income or Fee

In the federal procurement system, profit may only be earned by For-Profit organizations. Non-Profit organizations are required to treat any profit earned as Program Income, and are required to reprogram these funds according to state policy. Procurements shall not permit excess profit or program income. If profit or program income is included in the price, the Procuring Entity shall negotiate profit or program income as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed.

There is no fixed guideline for the identification of excess profit. The Procuring Entity is encouraged to establish a limit (for example, 5%) which may be based on the current market/industry standard/rate of profit for similar work. Any figure which exceeds a Procuring Entity's established limit must be clearly documented as justified, or reduced to that established limit. To establish a fair and reasonable profit or program income, consideration shall be given to the complexity of the work; the risk borne by the contractor; the contractor's investment; the amount of subcontracting; the quality of the contractor's record of past performance; industry profit rates in the surrounding geographical area for similar work; and, market conditions in the surrounding geographical area.

Procuring Entity contracts which provide for profit or program income should require that the provider submit a certification of revenue earned in excess of contract expenses through contract financial closeout reporting.

Contracts between governmental entities may not include profit or program income.

4. Second Year Costs

Solicitations which also seek services for a second year must be subjected to review and evaluation consistent with that of the original awarding year's review. Costs may be less in the second year in the absence of start-up costs. Other costs may rise due to inflation, salary or cost-of-living increases for staff assigned to the contract. All costs must be analyzed and documented as necessary and reasonable in the second/subsequent year.

ATTACHMENT D GUIDANCE ON CONTRACTING

A. Contract Negotiation And Award

The Procuring Entity should include in their procurement and contracting policy the authority and responsibility for proposal negotiation, final contract negotiation and award, as well as the method and scope of elements subjected to negotiation for proposals and contracts.

1. Competitive Range

A "competitive range" may be defined to establish a pool of negotiable proposals after the initial technical and cost/price evaluation has been completed. Procurement policies should clearly state the criteria for inclusion in the "competitive range", and should not exclude any proposal that may have a reasonable chance of being selected for award based on the initial proposal evaluation/review. Proposal negotiation discussions with offerors should be restricted to indications of proposal deficiencies and requests for additional technical or cost/price information. Upon completion of proposal negotiations, offerors must submit revised proposals which must be reviewed again for technical and cost/price evaluation prior to award.

2. Final Contract Negotiation

Written procedures should determine the method and authority for final negotiation of contracts and should establish the scope/range of negotiable contract aspects. Contract negotiations should not significantly alter the technical or cost/price aspects of the proposals. If they do, they make it necessary for the proposal to be resubmitted for award consideration prior to contract execution.

3. "High-Risk" Contractors

A contractor may be considered "high-risk" if a WDB/Program Operator determines that the contractor is otherwise responsible but:

Has a history of unsatisfactory performance;

Is not financially stable;

Has a management system which does not meet required management standards; or

Has not conformed to terms and conditions of a previously awarded contract or agreement.

When a contractor is considered "high-risk", special funding restrictions to address the "high-risk" status may be included in the agreement. Such restriction may include, but are not limited to:

Making payment on a reimbursement basis;

Requiring additional and/or more detailed financial or performance reports;

Performing additional monitoring;

Requiring the contractor to obtain specific technical or management assistance; and/or

Establishing additional prior approvals.

Should the WDB/Program Operator impose such funding restrictions, the contractor must be notified in writing as early as possible, of:

The nature of the funding restrictions;

The reason(s) for imposing the restrictions;

Any corrective actions which must be taken before the restrictions will be removed, and the time allowed for completing the corrective actions; and

The method of requesting reconsideration of the restrictions imposed.

B. Selection of Contract Type

WDBs/Program Operators may choose from several types of contracts, depending on the circumstances. Examples are:

1. Cost Reimbursement

WIOA Regulations require that agreements between governmental units must be on a cost-reimbursement basis, including agreements with community colleges and Vocational Technical schools. This contract type may be required for funding of "**high-risk**" contractors.

2. Fixed Unit Price

Requires payment of a specified price for specified deliverables irrespective of actual costs incurred.

3. Combination Cost Reimbursement And Fixed Unit Price

Utilized when some elements of performance are clear and definitive while other performance specifications are more uncertain. Provides shared risk.

4. Letter Contracts/Limited Agreements

WDBs/Program Operators/Service Providers may use Letter Contracts/Limited Agreements to expedite entry into an agreement with a contractor only in emergency or unique situations.

Letter/Agreements must include the specific time line of the agreement and the extent of CIWB/Program Operator/Service Provider financial and other liability. The agreement must include the signatures of all parties required as authorized signature for the full contract document, and may not obligate the Procuring Entity to enter into the final/full contract, should contract negotiations fail. Such agreements should include the following minimum provisions: specific deliverables required by, and within the time frame of the limited agreement. This may be achieved through reference to the contract proposal.

ceiling price of the limited agreement and the anticipated ceiling price of the final/full contract pending.

limit of Procuring Entity liability pending finalization of full contract document, including a provision that the limited agreement does not imply obligation to enter into a final/full contract. incorporate the Procuring Entity standard terms and conditions boilerplate.

agreement active time period and execution date with all required authorized signatures.

Such agreements should not be used as, or in place of, full contract documents. Justification or explanation of the nature of the emergency or unique situation requiring the use of Letter Contracts/Limited Agreements should be maintained in the contract file.

5. Subcontracts/Sub-Agreements

The WDB/Program Operator/Service should have written policy and procedural guidance that addresses the provision of subcontracts/sub-agreements between primary and secondary service providers. Such agreements are allowable. They must be consistent and in compliance with all related Federal, State and Local procurement and contracting laws, regulations and policies.

6. Retroactive Contracting (after-the-fact) for new contracts or for active contract change/modifications is not allowed.

C. Contract Elements

Contracts must include all elements necessary to fully delineate the Procuring Entity's and contractor's responsibilities. These should be clearly documented through a combination of standard boilerplate and specific contract provisions. Proposals may be incorporated, in part or whole, by reference in the contract document.

The development and inclusion of specific contract elements will be effected by the determination of the service provider's status as a subrecipient or a contractor. Aspects of the contract affected by this status may include, but are not limited to: cost classification, audit, and the general requirement to comply with WIOA and funding source regulation and policy. Although service providers may be considered subrecipients or contractors, all costs of contracts that are not exclusively for the provision of administrative functions are program costs.

Subrecipient is defined as a legal entity to which a subgrant/contract is awarded and which is accountable to the Procuring Entity (or higher tier subrecipient) for use of the funds provided. Distinguishing characteristics of a subrecipient include items such as: developing and operating programs specifically designed for a federal program which may include determining eligibility of applicants, enrollment of participants, performance measured against meeting the objectives of the program, responsibility for programmatic decision making, responsibility for compliance with program requirements, and use of the funds awarded to carry out a program or project as compared to providing "end-line" goods or services for use by a program or project (contractor). Subrecipient contracts/agreements identify the source of funds (e.g., WIOA) and require compliance with all related regulations and policy, including but not limited to, appropriate identification and classification of all costs incurred and coverage under required audits.

Contractor is defined as an entity that receives a contract, is responsible for providing generally required "endline" goods or services to be used by the program or project. These goods or services may be for the subrecipient's own use or for the use of participants in the program/project. Distinguishing characteristics of a contractor include items such as: providing the goods and services within normal business operation; providing similar goods or services to many different purchasers, including purchasers outside of the program; and operating in a competitive environment. Contractors are not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

Required Contract Elements

Contracts should contain the following elements, where applicable:

1. names of responsible parties and organizations
2. type of contracting organization
3. type of contract
4. amount of contract obligation
5. source of contract funds
6. training site(s)
7. contract effective time period
8. number of participants to be served
9. signature of authorized officials

10. document execution date(s)
11. statement of work/deliverables including goal statement/objectives, target group, justification for services products/outcomes/performance required outreach/intake and assessment program design/curriculum frequency of participant contact, activity time line, and follow-up
12. cost reimbursement line item budget data by cost category
13. payment and delivery terms/invoice forms and procedures
14. termination for cause/default/de-obligation/convenience
15. audit and record access and examination rights
16. record retention requirements
17. compliance with related federal state and local laws, regulations, and policies
18. conflict of interest and code of conduct requirements
19. debarment and suspension certification
20. anti-lobbying disclosure
21. provision against assignment/unauthorized subcontracting
22. procedures for changes/modifications
23. definitions of key terms
24. staff qualifications
25. reporting requirements - program and fiscal
26. table of contents
27. AA/EEO/non-discrimination
28. contractor insurance liability/bonding
29. grievance procedures for termination and non-payment
30. monitoring/corrective action/sanctions procedures
31. equipment and property allowance/disposition
32. severability provision
33. hold harmless clause
34. maintenance of effort clause
35. program income or work product requirements
36. individual authorized to sign invoices/request payment
37. operational plan - participant activity/expense schedule
38. protests/disputes/claims clause
39. subcontracting clause
40. Pell Grant/cost reduction clause
41. fund advance/reconciliation & recapture clause
42. contract close-out requirements
43. single audit or other audit requirement
44. program income or profit requirements

D. Contract Administration

The Procuring Entity should establish written policy and procedural guidance to address contract administration. The primary purpose of Contract Administration is to ensure subrecipient/contractor compliance with all contractual obligations; including, but not limited to, program performance and financial considerations. Policy and procedural guidance should include:

1. provisions to ensure payments consistent with contract terms,
2. provision for inspecting/monitoring work performed to ensure consistency with the contract terms,
3. procedures to provide technical assistance to contractors,
4. criteria and procedures for contract change/modification,
5. procedures for the review, approval and monitoring of sub-agreement procurements and contract documents,
6. procedures to execute termination provisions as stipulated in contract documents,
7. procedures to resolve contract protests/disputes/claims as stipulated in contract documents,
8. procedures to develop and monitor corrective actions as stipulated in contract documents,
9. required contract file documentation and retention procedures, and
10. procedures to close-out contracts and related reporting requirements.

Procuring Entity policy and written procedural guidance should provide for centralized contract files which include the following (See Attachment B for Contract File Checklist):

1. A copy of the contract with original signatures
2. Copies of any subsequent modifications with original signatures
3. Contract cost/pricing data
4. Contract proposal, if incorporated by reference
5. Pre-award surveys or review data
6. Subcontract/Sub-agreement approvals
7. Copies of required insurance policies and bonds
8. Copies of any SDA/SSA/Service Provider or Contractor correspondence
9. Monitoring reports/corrective actions/follow-up records
10. Invoice/Billing and records of payment documentation
11. Records of Cash advances and liquidation of funds
12. Equipment acquisition and property disposition records
13. Documentation related to termination actions
14. Contractor reports on deliverables provided
15. Contract close-out reports and related documentation

E. Contract Monitoring

Procuring Entity policy and procedural guidance should address contract monitoring, including systems for both program and financial monitoring to ensure contractor compliance with all elements of the contractual agreement. Monitoring documentation should include:

1. the method of identification of deficiencies
2. results of monitoring reviews
3. written notice to contractors regarding deficiencies
4. corrective action plans
5. follow-up and resolution of corrective actions.

Monitoring must be performed on-site at least once each program year. Financial monitoring must ensure that auditable records of financial activity are maintained and retained. Formal financial monitoring procedures should include the use of a monitoring tool and system sampling.

Fiscal Monitoring should include:

1. allowability of costs
2. cost classification and allocation
3. general ledger and records management
4. invoicing and cash receipts
5. cash disbursements
6. cash reconciliations
7. analysis of cash advances/cash on hand
8. subcontract/sub-agreement review
9. property/equipment management
10. purchasing/procurement systems
11. matching funds procedures and documentation
12. determination of program income/profit
13. compliance with all related Federal, State and Local laws, regulations, policies and contractual requirements
14. determination that financial performance is commensurate with program performance.

Program monitoring should address the following areas:

1. Provision of quality services.
2. Performance monitoring to ensure achievement of contract objectives/contractual obligation.
3. Compliance monitoring to ensure satisfaction of contractual and regulatory requirements.

Program performance monitoring should include:

1. quality of participant enrollment/intake
2. quality/quantity of participant counseling
3. quality of participant orientation
4. quality of training provision
5. quality of case management records and systems
6. quality of job development and placement activity
7. quality/allowability of participant support services
8. contractors personnel systems 9. termination and follow-up
10. level of outcome performance
11. subcontract/sub-agreement program/performance review
12. achievement of other specific contractual objectives
13. compliance with all related Federal, State and Local laws, regulations, policy and contractual requirements

F. Contract Corrective Action

WDBs/Program Operators/Service Providers should have systems to document and resolve contract corrective actions as stipulated in the contract document. Procedures should designate authority and responsibility for development, monitoring and follow-up of corrective action plans. The corrective action plan should define the deficiency, state all resolution actions required, provide a time line for resolution, and include follow-up verification.

G. Contract Close-Out

Procuring Entity should document contract close-out. Contractors should be required to close-out agreements in a timely manner (consistent with close-out reporting requirements). Close-out reports should include the following minimum items:

1. Statement of Subcontract/Sub-agreement termination.
2. Statement of Status of Cash accounts and liquidation of advances.
3. Statement of settlement of all contract related financial or other liabilities.
4. Statement releasing Procuring Entity from any further liability.
5. Assignment of any refunds, rebates, or credits due.
6. Statement of program income/profit and its disposition.
7. Final Invoice for payment.
8. Reason for termination (completion or other).
9. Any other reports required by the contract document.

WIOA Local Four-Year Plan Signatories
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Fiscal Years 2026 - 2029

MassHire Cape and Islands Workforce Board

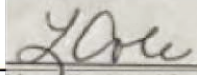
Name of MassHire Workforce Board

This Local Four-Year Plan shall be fully executed as of the date of signatures below, and effective through June 30, 2029. The Plan may be amended or modified if agreed to by all parties.

Signature indicates acceptance of the Local Four-Year Plan.Typed Name: **Sheila Lyons**

<div style="border: 1px solid black; padding: 2px; display: inline-block;">Signed by: </div>	8/5/2025
Chief Elected Official (or Designee)	Date

Typed Name: **Lindsay Cole**

<div style="border: 1px solid black; padding: 2px; display: inline-block;"></div>	8/5/25
MassHire Workforce Board Chair (or Designee)	Date

Typed Name: **Kara O'Donnell-Galvin**

<div style="border: 1px solid black; padding: 2px; display: inline-block;"></div>	8/8/25
MassHire Workforce Board Director (or Designee)	Date

Typed Name: **Kris Dower**

<div style="border: 1px solid black; padding: 2px; display: inline-block;"></div>	8/5/25
MassHire Career Center Director	Date

Typed Name: **Ana Maria Chiappe**

<div style="border: 1px solid black; padding: 2px; display: inline-block;"></div>	8/8/2025
MDCS Operations Manager	Date

Typed Name: **Kris Dower**

<div style="border: 1px solid black; padding: 2px; display: inline-block;"></div>	8/5/25
Title I Fiscal Agent	Date