**WorkforceGPS**

**Transcript of Webinar**

**American Job Center Certification: A Tool to Maximize States' Quality and Consistency of Services**

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JONATHAN VEHLOW: Again, if you haven't already done so or if you're just joining us, please introduce yourself in that welcome chat. We'll have a similar chat up throughout today's webinar where you can type in your questions, comments, or concerns at any time.

So without further ado, I'd like to turn thing over to our moderator today, David Jones, workforce analyst, Employment and Training Administration with the U.S. Department of Labor. David?

DAVID JONES: Great. Thanks, Jon. Today I will be joined by co-moderator Ed West, who serves as a VR program specialist monitoring the VR agencies within the U.S. Department of Education. As background, Ed and I were once former colleagues at education and glad we can partner again on the topic of joint importance across federal agencies.

As a general overview, the certification process establishes the minimum level of quality and consistency of services in American Job Centers across the state. The certification criteria allow a state to set standard expectation for customer-focused seamless services from a network of employment training and related services that help individuals overcome barriers to obtaining and maintaining employment.

To help give that overview, Ed and I will be joined with state presenters from across the country. From the state of California we have Marissa Clark who serves as a policy unit manager within the California Employment Development Department. Marissa played a leadership role in the recent state board approval of a certification standard in which she will provide an overview today.

From the state of Michigan we have Sue Ann Searles who serves on the governor's talent investment agency for the state. Sue Ann was the lead author of the statewide America Job Center policy and monitoring checklist. And finally, from the state of Missouri we will have Danielle Smith who serves as Missouri's equal opportunity officer. Danielle had been a leader as it relates to increasing awareness of accessibility issues in her state.

EDWARD WEST: Thanks, David. This is Ed West. On behalf of the Rehabilitation Services Administration, we are glad to be here today as a core program partner in this joint effort to help grow the strength and service coordination within the American Job Center network.

For our joint presentation today we have three key objectives. First, to understand the guiding principles from WIOA, joint regulations, and joint guidance surrounding the American Job Center certification. Both David and I look at that federal overview in today's agenda.

Second, to demonstrate through examples how the certification process is applied by states to its AJC network for effectiveness, continuous improvement, and programmatic accessibility.

And finally, we hope that everyone can leave today's call recognizing the significance of the AJC certification process and how it can be one innovative tool to help establish a seamless customer-focused delivery for our shared customers in the AJC network.

MR. JONES: For the federal overview portion, it's important we first put a spotlight on what has been established in this topic area as well as its corresponding regulations. Under WIOA the AJC certification process is outlined within Title I under workforce development activities in Section 121(g) titled certification and continuous improvement of the One-Stop centers.

Basically, the general provision establishes that the state board must establish objective criteria and procedures for use by local boards. The statutory provision continues to outline the criteria to be applied, which include effectiveness, continuous improvement, and physical and programmatic accessibility.

Now, the joint regulation provide further clarification as to how this should get applied by asking the simple question, how are One-Stop delivery systems certified for effectiveness, physical and programmatic accessibility, and continuous improvement? In addressing this very same question, the interagency partners took this a step further to provide clarification in joint interagency guidance.

In our resource page at the end of this presentation, we cited the specific joint CFR regulatory citations and interagency guidance for your continued reference. Over the next few minutes Ed and I are now going to translate this in a very straightforward manner and hopefully clarify both key responsibilities and different terms.

MR. WEST: That's right, David. Let's break it down first clearly outlining the roles and responsibilities of the key players in each state. The state workforce development board is responsible for establishing objective criteria and procedures to be applied within the state. It should be developed in a manner that is consistent with the guidelines, guidance, and policies provided by the governor and state board consensus.

To ensure this is a collaborative effort in this development, the state board should work in consultation with chief elected officials and local boards. Please reference the resource page at the end of the presentation, as it includes the approved statewide policy for Michigan, Missouri, Washington State as examples, and California's policy will be made public over the next few weeks.

Whereas the local workforce development board is responsible for certifying the American Job Centers every three years based on the guidelines established by the state board, this includes comprehensive as well as affiliated American Job Centers. It is important to know that the local board has flexibility and then may establish additional criteria beyond the guidelines established by the state board in carrying out the certification process.

These important activities are all interconnected and documented as part of the state plan process. For example, as part of the state plan modification process due by all states in June of 2018, states must review and update its certification criteria as part of the state plan submission.

MR. JONES: Ed just described who does what. Now, we want to drill down further on the guiding criteria themselves with the first of the three being effectiveness. Basically, evaluations of effectiveness examine the extent to which the AJC integrates available services and meets the needs of local employers and participants. Again, there are discretion by states on how this gets applied.

So let's suppose a state wanted to establish standards around its customer service. The state would set standards surrounding how the American Job Center streamlines its intake form across programs, ensures the postings are current in the resource room, provide resource for all partner programs with websites and materials, or examine the extent to which the AJC provides flexible business hours to meet customers' needs.

MR. WEST: For our second criteria, continuous improvement requires the AJC network to collect, analyze, and use multiple data sources. This would include how well the AJC supports the achievements stemming from the negotiated levels of performance. This criteria is very objective by examining what systems are in place to improve AJC operations in this area.

States could draw data from the following practice, having systems in place such as customer satisfaction surveys to respond to customer feedback, having systems in place for identifying and responding to technical assistance needs from its performance data, or having systems in place for professional development.

MR. JONES: Finally, for our third criteria, evaluations of physical and programmatic accessibility must include how well the AJC ensures equality opportunity for people with disability to benefit from the services from the AJC. This criteria is basically making sure we don't forget about the disability population by emphasizing that all AJCs must be physically and programmatically accessible.

In taking a step back for a moment, the DOL evaluation report released in January, titled evaluating the accessibility of American Job Centers for people with disabilities, identified that 92 percent of the AJCs were fully accessible in the physical domain but only 44 percent of the AJCs were fully accessible in the programmatic domain.

In our presentation later today, the state EO officer of Missouri will provide a more detailed overview of these terms in their remarks on how they are working it through. For this criteria linked with evaluations of effectiveness, states must include how well the AJC network take action to comply with disability regulations implementing WIOA Section 188, which are the nondiscrimination and equal opportunity provisions of WIOA. At a minimum accessibility requirements must comply with equality opportunity provisions of WIOA Section 188 and its regulations.

In our resource page we have a link on the DOL Section 188 reference guide that I hope you will check out. That guide will provide very helpful examples. For instance, some accessibility areas in the physical domain could include an external factor such as availability of transportation to the AJC or an internal factor in having flexible, adjustable work stations. Programmatic accessibility may include factors such as providing reasonable accommodations as well as administering programs in the most integrated settings appropriate.

MR. WEST: The federal partners often get questions about our role in this area, and we wanted to give a quick overview. In this area the departments are giving states discretion in determining how to establish and operationalize this AJC certification process. The departments will not issue further requirements for certification and will not issue a single national certification checklist.

We encourage you to reference the One-Stop operations joint guidance that provides a general overview as well as lists previously used criteria that was tracked as possible examples. We recognize each state is different and encourage you to reach out to your peer states so you may make meaningful comparisons to your own state process.

At this time I will now turn it over to our state presenter from California, Marissa Clark.

MARISSA CLARK: Good afternoon. Thank you. My name is Marissa Clark, and I am from California, as they mentioned. I work for the Employment Development Department, and so as David mentioned, our certification policy is not published yet. It will be out any day now, and as with all of our policies, we issue them in draft first to allow the workforce community to provide public comments. We then take those comments and incorporate them into our final version. So that draft should be out, as I mentioned, any day.

So just jumping into a quick overview, as was previously mentioned, the WIOA Joint Final Rule outlines three main areas for AJC certification, effectiveness of the AJC, physical and programmatic accessibility, and continuous improvement. California's certification process is really centered on these key requirements and aims to set a statewide standard of service delivery that ensures all customers receive a consistent and high-quality level of service. And just a quick note. In California our American Job Center brand is America's Job Centers of California. So we typically refer to our centers as AJCCs. I just want to mention that in case you're wondering where the extra C comes from when I mention the acronym.

So California's policy development process utilized three main tools. We started with federal guidance, then went to state guidance, and last and most importantly was stakeholder input. For federal guidance the policy highlights key requirements both from the WIOA statute and the WIOA Final Rules.

We also drew from TEGL 4-15 which outlines the department's joint vision for the One-Stop system and TELG 16-16, which provided that general operational guidance. In regards to state guidance, the policy pulls really heavily from our WIOA state plan, and we also looked at other state certification policies to kind of get some inspiration from that.

And most importantly, the state board convened an AJCC certification workgroup made up of WIOA core program state partners, so your Title II, Title III, Title IV, and our TANF partner, as well as an array of local board representatives in order to review and provide substantive input on both the certification criteria as well as our proposed certification process.

In California we are proposing having two certification levels. The first is going to be baseline AJCC certification, and the second is called the hallmarks of excellence AJCC certification. The baseline certification is meant to ensure that the AJCC is in compliance with those key WIOA statutory and regulatory requirements.

So if an AJCC meets these requirements, they will be considered to be certified. Now, the next step is going to be a hallmarks of excellence, and that goes kind of above and beyond. And this portion is a little more complex and is meant to encourage that continuous improvement that was mentioned by identifying areas where local boards may be exceeding quality expectations as well as areas in which improvement may be needed.

So I'll start with just giving you a high level of the baseline criteria. The baseline criteria includes those important requirements, as I mentioned, that we felt were just essential to the operation of a successful and a high quality AJCC.

So in order to receive the baseline certification, the center must meet all of the following. One, implement a signed memorandum of understanding. In California we separated our MOU development process into two very distinct phases. Phase one addressed service coordination and that collaboration amongst the partners. Phase two builds off of that and addressed how to functionally and fiscally sustain that system described in phase one through resource sharing and joint infrastructure cost funding. So both of those would need to be in place.

The second is the AJCC is implementing the local board defined roles and responsibilities of the operator and career services provider. The third is that the AJCC meets all regulatory requirements to be a comprehensive AJCC as outlined in the Final Rule. So this is going to be things such as they have a Title I staff person physically present.

They provide access to career and training services and access to the partner program services, either at or through the center. And then lastly is accessibility. The AJCC ensures equal opportunity for individuals with disabilities in accordance with the ADA, WIOA Section 188, and all other applicable federal and state guidance. So so long as a center meets this criteria, they will be considered certified.

Now, that second level is hallmarks of excellence, and I'll go through each of them. The eight hallmarks of excellence were designed to encourage local boards to not just aim for a baseline level of compliance but rather continually go above and beyond in all aspects of their service delivery.

So in our policy each hallmark is accompanied by eight quality indicators that were developed to assist local boards when they're doing their evaluation and ranking to understand what are the types of things they should look for under each hallmark. So I'll mention just one or two of those under each hallmark as I describe them.

The first is the AJCC physical location enhances the customer experience. So some quality indicators for this would be the location is convenient for all customers, including those with barriers to employment. It has adequate parking and is accessible by public transportation. Another indicator could be the center is designed so that it is easy for customers to access services, resources, and staff and assistance.

Our second hallmark is the AJCC ensures universal access with an emphasis on individuals with barriers to employment. So some of the indicators we included are the local EO officer periodically reviews the policies, procedures, and facility for both accessibility and equal opportunity and then provides appropriate recommendations and staff training. Another would be that the center has a limited English proficiency plan in place to provide meaningful access for individuals whose primary language for communication is not English and who have a limited ability to read, speak, write, and/or understand English.

The third hallmark is that the AJCC actively supports the One-Stop system through effective partnerships. This can mean that they have a system in place to assess the satisfaction of both the collocated and non-collocated partners with the center and its services as well as centers having a partner referral process that focuses on really quality referrals that are likely to convert to services.

The fourth hallmark is the AJCC provides integrated, customer-centered services. These indicators can include staff have received customer service and customer-centered design training, and all staff are cross-trained in program partner eligibility and services so they have the capacity to functionally serve all customers.

All right. And the next set. The fifth hallmark is the AJCC is an on-ramp for skill development and the attainment of industry-recognized credentials which meets the needs of targeted regional sectors and pathways. And this is a very big focus in our state plan. So we wanted to make sure to include it.

Some indicators would be the center strives to increase the number and percentage of AJCC customers receiving skill development and training services resulting in industry-recognized credentials, and the staff are aware of the target sectors, can identify regional career pathways, and really understand what those mean in terms of providing services to customers.

Our sixth hallmark is that the AJCC actively engages industry and labor and supports regional sector strategies through an integrated business service strategy that focuses on quality jobs. Some of these indicators include all staff have knowledge of the regional economy, labor market conditions, business talent supply chain, and the needs of high-growth sectors and employers, as well as the center having a defined strategy in place to regularly seek and capture employer advice in the design and delivery of demand-driven services for jobseekers.

The seventh hallmark is that the AJCC has high-quality, well-informed, and cross-trained staff. This can mean that the center has regular meetings with all staff, regardless of their program, in order to build relationships, provide updates on center activities, and discuss strategies for improvement, as well as the fact that staff may have received training on eligibility for other AJCC partner services, as well as the process for referring customers to those services.

And our eighth and final hallmark is that the AJCC achieves business results through data-driven continuous improvement. Indicators include that the center has system in place to capture and respond to specific customer feedback, complaints, and compliments, or the center regularly reviews and analyzes performance, customer satisfaction, and service data and uses that to develop specific plans for improvement.

So with these hallmarks, they're each ranked on a scale of one to five, one meaning there is no progress on the hallmark at this time, five meaning they are achieving and excelling at that hallmark.

And in order to receive the hallmarks of excellence certification, an AJCC must have first met that baseline certification I mentioned, and then they must also receive a ranking of at least three for each of the hallmarks, meaning each of the hallmarks they rank as having a satisfactory amount of the hallmark in place the majority of the time.

And since the ultimate goal if for local boards to work closely with each of their AJCC to continually improve and progress within each hallmark, all local boards will develop a continuous improvement plan for each center that outlines how they plan to increase the ranking for each hallmark or maintain their ranking, if there is a hallmark for which they've already achieved the five.

Now, as we went through this process, there were a couple successes and barriers that we ran into. So I just want to highlight a couple of those. In terms of successes, one of the things we thought was great about this was that our policy's very closely aligned with the vision laid out in the state plan, as well as other state WIOA policies, to help ensure that we're all moving towards the same outcomes.

A second strength would be that rather than looking at certification as a simple compliance checklist that is completed once every few years, we built the policy in a way that is geared towards that ongoing and continuous improvement. And last, the policy really allows local boards to drive the process. They're the key decision makers for all of this, as opposed to having the state dictate everything.

In terms of some of the barriers or concerns that came up, one was how to ensure an objective and independent evaluation when local boards serve dual roles. In California we do have a handful of boards that serve as the operator as well as the career services provider or one or the other.

So one attempt we made to kind of mitigate this concern was by stating in a policy that, if a local board was also the career services provider, there has to be a clear firewall that separates the staff who work in that center from whoever's going to be conducting that evaluation of that center. Another kind of barrier was that – or concern was in the past, when rankings have been involved, it kind of led to local boards being compared against each other, which we didn't want to happen.

So in our policy we really try and emphasize the fact that this is not to be viewed as a comparison or competition tool amongst local boards. Rather, it should be viewed as a self-improvement tool that's really aimed at making each individual AJCC the best it can be. And then lastly is the concern that I'm sure everyone has, and that's just workload.

The workload associated with certifying the hundreds of AJCCs in California is a significant undertaking, mostly for the local boards as well as for the state. So trying to ensure compliance and improvement for each center while juggling all the other WIOA requirements is a challenge.

But with all that said, California is very, very excited about this process, and we intend to continue learning and improving upon it as implementation unfolds. If you have any questions, please feel free to reach out to me. As I mentioned, the directive should be out in draft within the next week or so. So feel free to e-mail me at any time if you want me to send you all a link. And in the meantime, I will turn it over to Sue Ann from Michigan.

SUE ANN SEARLES: Thank you, Marissa. Good afternoon. My name is Sue Ann Searles, and I am the workforce specialist responsible for certification of Michigan's One-Stops. In Michigan our branding is Michigan Works in addition to the American Job Center branding, and we have 16 local areas that are comprised of 71 comprehensive One-Stops that we refer to as Michigan Works Service Centers. There are also 28 satellite or affiliate service centers as well.

So to give a little bit of historical perspective of certification in Michigan, we've always been focused on continuous improvement and quality. After the Workforce Investment Act was put into law, Michigan developed minimum standards in 2001 that were adopted by the state workforce investment board at the time, and they were used to certify all of the comprehensive service centers.

This was a self-certification process. The emphasis of minimum standards was on the brick and mortar buildings, accessibility and creating a welcoming environment for everyone, how the services were integrated, quality resource rooms, and customer service. In 2006 the minimum standards was converted to policy, which included a self-assessment and on-site review, and then in 2015 that policy was updated to incorporate the WIOA vision and requirements.

So where we are in the process. All local areas submitted their assurances in January of 2016 with a description of their system. It is the local workforce development board's responsibility to ensure that all of the certification criteria is met. At that time the comprehensive service centers listed were considered certified. We are just starting the on-site review part of the process, and so far two of the local 16 areas have been visited, which is only 5 of the 71 service centers. So we have quite a few to go yet. The goal is to complete half of them this year and then finish the other half by the end of 2018.

So the previous certification policy was also the basis for our current policy, 15-30 certification criteria for Michigan Works service centers that was published in December of 2015, and that incorporates the requirements of the WIOA on effectiveness, continuous improvement, and programmatic and physical accessibility. I believe a copy of the policy was made available to everyone through the resource link.

Prior to drafting the policy, I did research from other states, which at the time, though, there was not much out there for certification under WIOA. However, I did find information from the state of Washington that was particularly helpful. I also used TEGL 4-15, the vision for the One-Stop delivery system, which was great in outlining the characteristics of a quality One-Stop center. And I also have a change to the policy now in review that incorporates the American Job Center requirements from TEGL 16-16.

Part of our policy approval process includes an external review where the local workforce development boards and local areas can comment and provide feedback. Then the policy was presented to our state workforce board, the governor's talent investment board for comment and approval.

We did get some feedback from our state board that pertain to performance and setting measures. It was recommended it be left up to the local workforce development boards to set measures and create their own dashboards, and then also we got some comments regarding what would happen in the instance of noncompliance.

So our current certification policy sets the stage for the next chapter of quality service centers in Michigan. Our new process includes assurances that all criteria from the policy are met, and we ask that local areas send us a list of their comprehensive and affiliate sites. This new process also includes an on-site review, and I have a guide that has a series of questions to be discussed with staff and also a facility review checklist.

As part of the process I also do a desk review and look over the local area and regional plans, which is helpful to see the different strategies the area's using and what partnerships they have in place with various stakeholders before I go out. And then you can also do things like check websites for the American Job Center identifier, things along those lines. Once I'm actually at the facility for the review, I have discussions with staff, participate in a tour of the facility.

I spend some time by myself in the resource room observing while I work through the review guide, and then I usually check back with the staff for any unanswered questions. And this usually takes about a half a day. An exit interview is also scheduled to go over the highlights of the visit with the Michigan Works area director, and then all of this is followed up in a report to the local area and the workforce development board chair.

So one of the strengths of our process I believe is the follow-up on-site reviews. This helps with the consistency and accountability since there really is nothing better than actually getting out there see day-to-day operations, and it also helps track best practices.

Since we're just starting the certification cycle, I haven't really encountered any challenges yet, although one thing, though, is the on-site reviews are very labor-intensive, as was mentioned by Marissa too, the workload, and it takes a lot of time. I estimate that the on-site review process will take two years to complete.

You could also consider a challenge the differences in our local areas and how they do things. You're always seeing something different and providing services and practices. In Michigan the dynamics of the upper peninsula are very different from Detroit, both in terms of their local economies and demographics of the populations, but this is the case for all urban areas versus rural areas.

Continuous improvement in quality service centers is not anything new in Michigan. However, evaluating effectiveness is. So for this cycle of certification the goal is to lay out the groundwork for the next cycle. We as a state leave it up to the local workforce development boards to develop their own methods of customer satisfaction and performance. So local areas have the opportunity to put their own metrics and continuous improvement plans in place. However, we do require that they have this in addition to the federally required performance measures.

So my phone number and e-mail is listed. So please feel free to contact me if you think of any questions later or you need any additional information. And now, thank you everyone, and I have the pleasure of introducing Danielle Smith, the state EO officer from Missouri.

DANIELLE SMITH: Thank you, Sue Ann. And today I will be talking about some of our partnerships that assisted us with creating our criteria for the job center certification. Just to give you an overview of Missouri, we have 14 local workforce development areas, 31 comprehensive job centers, and 13 affiliate American Job Centers.

I'll review some of the resources and tools and partnerships we use, but the main tool that we used in Missouri was the Promising Practices in Achieving Universal Access and Equal Opportunity: the Section 188 Disability Reference Guide, which is a great tool. This guide was developed by the Department of Labor, and we used this tool to create system-wide training for all of our staff.

And so far we've received great reviews. Missouri designed training for all of our local equal opportunity officers and our leadership teams using the Section 188 guide as a blueprint for ensuring compliance for all of our job centers. Our partnership included training with the LEAD center and Jamie Robertson and our core partner Yvonne Wright from voc rehab who was instrumental in the One-Stop certification design process.

We customized the training for all levels of management and frontline staff using recorded webinar. This has been an effective process that has improved our knowledge at all levels, and staff have benefited from this training and from the interaction in the centers.

Programmatic accessibility is huge. It includes the job center policies, practices, and procedures that enable us to provide effective, meaningful services and opportunities for persons with disabilities to participate in and benefit from all of our programs, services, and activities and trainings in our job center.

All WIOA Title I programs, services, and activities must be accessible to customers with various disabilities. Job centers must have reasonable accommodations for individuals with disabilities and be able to make reasonable modification to policies, practices, and procedures in the job centers. We have stressed in Missouri how important outreach is with our local EO officers. Outreach and compliance is the key to effective programs in your job center.

Physical accessibility includes your customers able to receive your aids, benefits, and services when they're participating in programs at the job center. This includes modification of the physical aspects of your location, including things like your indoor walkways, how your cubicle settings and computer work station are laid out, your alarm systems and signage in the career centers or in the job centers, the common areas used by customers, parking areas, and access to varied types of public transportation.

So here are some questions you can ask yourself when you're developing your job center certification. Does a person with a hearing loss know when the fire alarms sound, and can they easily identify the escape route with signage and walkways are posted or developed in the parking lot? Can a visual impaired person easily navigate a maze of cubicles in your job center, or can they easily access the center from the parking lot?

We've had a lot of assistance from our disability partners, including voc rehab and the Center for Independent Living. We've also had assistance from the rehab service for the blind and Missouri Assistive Technology, and we have also partnered with the Great Plains ADA Center. These are some resources that you could look for in your state to assist you with your job center certification.

So some key takeaways or some lessons learned that you could take with you are some action items you can think about for your job center certification. You should empower the role of the EO officer. You want to make sure that your EO officer is active and that they are implementing your policies and procedures for your job center. As far as communication, do you have your posters in braille?

Do you have them in different languages, and do you have them in audio form for your customers? In your contracts and agreements do you have the required equal opportunity assurance language in all of your contracts and agreements or your MOAs or MOUs? As far as universal access, are all of your programs, activities, and service accessible to everyone, including individuals with disability and your limited English proficiency customers? Are you compliant with your 504 disability requirements? Does your job center staff know your reasonable accommodation policy? Are they familiar with it?

And as far as data collection, are you collecting the equal opportunity demographics on all of your customers and employees so that you can conduct your data analysis as required in the new nondiscrimination equal opportunity regulations? Are your local equal opportunity officers or your state equal opportunity officer monitoring your job centers for compliance to ensure that they are in compliance with the regulations?

And as far as the complaint process, you want to ensure that your customers and staff are aware of the complaint process so that, if there is a problem, a customer has their rights and they know that they can file a complaint. And finally, your corrective actions and sanctions. Do you have a corrective action and sanction policy in place for those recipients that violate your regulations or do not comply with some of your policies? These are some key things that you could think about when you're developing your job center certification criteria.

So you may contact me at my e-mail address. Our policy is posted on this webinar as well. If you have any more questions, please feel free to contact me. I'm going to turn this back over to David.

MR. JONES: Great. Thank you, everyone, and we'd really like to sincerely appreciate – extend our thanks to the presenters for their time today. And this is the best part of the webinar where we actually have Q&A and get to exchange information. We do have a few questions that came in through the chat box, and we would like to go ahead and begin asking some of these questions.

See we have is, "Could you explain why we certify every three years but we view every two years?" And that's a very good question. Basically, it's – we asked that very same question when the regulations and guidance were developed, and it stemmed from WIOA. It stemmed from what is written in statute of law. So that is why it is the way it is.

The next question is, "You indicated that comprehensive and affiliate sites have to be certified. Are stand-alone voc rehab offices which are specialized sites with no other partner on site subject to the certification process?" And really this is left to the discretion of the state. It is at the state level that do consult with local boards and also with CEOs on the criteria.

And we do know that VR is on the state board and they're also on the local board and so it is at the state level where they can make this decision. And from my own experience in VR, we do know that they very much want to be inclusive in making sure that their centers are accessible. So that would answer this question.

OK. We see another question. This question will go to California for Marissa. "Will there be incentive funding for achieving hallmarks of excellence?"

MS. CLARK: That's a great question. Actually, that was discussed in the work group, and at this point there is not. That's not to say in the future after we kind of roll out the process and work out the kinks and get a better idea of what implementation looks like there couldn't be, but at this point in time. No. There will be no incentive funding attached to that hallmarks of excellence criteria ranking.

MR. JONES: Great. And we have another question for Marissa in California. "Will it be possible to get a five in one area and a one in another area and still make the baseline based on what you described in your presentation?"

MS. CLARK: Another really great question and another thing the work group actually discussed as well and kind of went back and forth on is whether the ranking should be an average or a bare minimum for each and ended up deciding that it would need to be at least a three in each category, not an average based on maybe a one in one and five in another, only because the idea was that, if you're going to receive that hallmarks of excellence ranking, the above and beyond that compliance certification, there should be at least a satisfactory amount that you're meeting each hallmark, not really, really excelling in one and then not even addressing another. So at this point it's just a minimum three across the board.

MR. JONES: OK. Thank you. We have a question for the federal level. "Does the certification not apply to the affiliate sites?" The certification applies to both the comprehensive and affiliate sites based on the guidance that we provided.

We have a question for Michigan for Sue Ann. "Does Michigan only have comprehensive and affiliated site? Are there connection sites? And if so, do you certify?"

MS. SEARLES: We do have connection sites, and no. We do not certify them.

MR. JONES: We have another question for California for Marissa. "Has the state board done the certification for any of the California local areas that have board operators?"

MS. CLARK: They have not yet. However, they will be, as that is outlined in the Joint Final Rules. Currently, in our draft policy we do say, though, that for the local boards who are acting also as the operator, what we'll have them do is do an initial self-assessment. The policy will have kind of matrixes and checklists as an attachment that we'll have them do a self-assessment and then the state board will come out and do that follow-up on-site evaluation in the instances where they're the operator as well.

MR. JONES: OK. Thank you. We have another question that came in, and this can be for any of the presenters. And one of the presenters mentioned that she may have missed this, and she wanted to get clarification of, "Who is on the team to conduct the certification reviews?"

MS. SEARLES: This is Sue Ann from Michigan. So far it's me.

MR. JONES: Right. And you're monitoring to make sure that the local boards carry out their certification process correct; is that right?

MS. SEARLES: Right. These are – this is an – an on-site review is done to verify they're in compliance.

MR. JONES: Right. Thank you. We have another question. "Do any states offer incentive for a center to become certified, financial or otherwise?" And I believe California had to direct that issue. And, Michigan, do you have a response?

MS. SEARLES: I'm sorry. What was the question again?

MR. JONES: Are there any financial incentives for a center to become certified, financial or otherwise, in Michigan?

MS. SEARLES: Not financial. No.

MR. JONES: OK. And we look like we have another question. "Are there specific penalties or sanctions for non-certification either by not meeting the deadline or due date to be not compliant?" So are there any penalties with sanctions?

MS. SEARLES: This is Sue Ann from Michigan. When we go – I would say no to that. We'll work with our local areas and the local workforce development boards if there is an instance of noncompliance. They're – they would be notified, and then they would have time to respond to any deficiencies and how they were going to become in compliance.

MS. CLARK: And this is Marissa from California. Our current draft policy has a corrective action plan requested. If they don't meet that baseline certification, they're asked to develop a corrective action plan that also includes target dates for when they believe they will come in compliance with those key requirements because, as I addressed, all those requirements are required elsewhere in WIOA.

They're not necessarily specific to certification. So there are things that would need to come into compliance one way or another. And then once those are set, they can go for that hallmarks of excellence, if they wish to do so.

MR. JONES: Go ahead, – (inaudible). Do we have another response?

Danielle Smith: This is Danielle from Missouri. We look at any outstanding violations as a guide before we provide the certification. So if there are any outstanding issues, that they have to make sure those are corrected before they become a certified job center.

MR. JONES: We're continuing to look at the great questions coming in. For Michigan, Sue Ann, "In Michigan you have 16 local workforce development boards and 71 One-Stop. How is that arranged geographically?"

MS. SEARLES: It's done regionally. I guess I don't understand what you mean how it's geographically.

MR. JONES: I think, Sue Ann, maybe you could help describe how it's very geographically diverse within Michigan from a rural to the urban and the challenges that might be present with making sure services are consistent throughout the state.

MS. SEARLES: Well, I – it's – the policy outlines what is expected in the criteria, and then the local areas, they have – they might have different ways of implementing how they meet that criteria. I guess I'm not understanding – quite understanding the question.

MR. JONES: Sure. That's fine. I think we'll just go to the next question. It was a little unclear, and if that question would like to be repeated by the person who asked it, that's fine.

For California, "What is the criteria for basic certification?"

MS. CLARK: So the baseline certification is several key requirements, as I went through. One is going to be they're implementing a signed memorandum of understanding, which in California means there's a phase one and phase two in place.

Also they're implementing the local board defined roles of the operator and the career services provider in compliance with the law and our state directive, that they meet all the regulatory requirements to be a comprehensive AJCC because right now we're just focused on comprehensives, and finally, that they ensure equal opportunity for individuals with disabilities in accordance with ADA, Section 188, as well as several state laws that have to do with that topic as well.

MR. JONES: Thank you. We have a question, are there national level vendors who may be able to assist with providing technical assistance for basics – for – can we scroll down – for – or 16. We missed another question. "Would a library that allows customers to utilize their computers to access workforce services be considered an affiliate site and subject to certification?" Marissa or Sue Ann, would you like to take that question?

MS. CLARK: I will let Sue Ann take that one, only because that this point California's kind of doing it in a two-stage approach. We're focused on certifying our comprehensives right now, and we have a certain set of criteria that I went over. We plan on developing a separate set of criteria for our affiliates down the road. So we're not quite to that point yet.

MS. SEARLES: We would not certify that. That's – it could be considered an affiliate site, but it would not be subject to certification.

MR. JONES: And just to clarify, if a library is a One-Stop, you must certify, and if it's not, you do not have to certify.

MS. SEARLES: Yes.

MR. JONES: Great. And we're continuing to look at the many questions that are coming in at this time.

OK. Well, we are nearing the end of time, and what we would like to do is highlight some guidance and upcoming resources so then you have it as a continued reference. For the guidance page we wanted to make sure that you have references related to what we talked about today with WIOA, the Joint Rule, and joint guidance with the vision and the operations guidance.

With resources we do have the links for the state policy that was referenced by Michigan and Missouri during today's call. As Marissa explained, for the state of California it will be published soon, but this is the web link where it will be referenced. And for the state of Washington we learned that that is a leader in this area, and so we provided that link here for reference for others.

For additional resources to reference, we have the link for the evaluating the accessibility of American Job Centers for people with disabilities, and while it does give statistics on where the AJCs are on accessibility, I do think it does provide good insights as to what strategies are being applied as it relates to making the facilities accessible programmatically and physically.

So it's really a good resource. In addition we have another resource, Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide, and this is what Missouri, Danielle Smith was able to make reference during her remarks earlier.

We do have several upcoming webinars coming up. In two weeks we will be having a webinar, an MOU part one, overview and development, and we also have other webinars. And for the competitive selection of One-Stop operators, deep dive, I learned recently that that will occur on May 4th.

And at this point I would like to pass it over to Jon from Maher.

(END)