

Executive Committee Agenda

Zoom Video Conference
Friday, August 14, 2026
10:00 a.m.

Introduction & Call to Order

J. Howe

Public Comment

Review & Approval of Meeting Minutes

J. Howe

Committee Updates & Action Items

- Audit/Finance Committee
 - Action Needed: Lease for PA CareerLink® Centre County
- EARN Committee
- Governance Committee
- Personnel Committee
- Policy & Performance Committee
 - Action Needed: Policy on Policies
 - Action Needed: Monitoring Policy
 - Action Needed: WIOA Title I Program Complaint Policy & Procedures
 - Action Needed: Conduct at PA CareerLink® Policy
 - Action Needed: The Link Contract
- Youth Committee
 - Action Needed: In-School Youth Contract

Executive Director Updates

E. Mulberger

Open Discussion

J. Howe

Upcoming Meeting Dates

J. Howe

- LEO Prep Meeting – September 16, 2026 @ 9:00 a.m. at the Union County Government Center
- Joint WDB/LEO Meeting – September 16, 2026 @ 10:00 a.m. at the Union County Government Center
- Executive Committee Meeting – October 9, 2026 @ 10:00 a.m.

Executive Committee Updates and Actions to be Taken

August 14, 2026

1. Motion to approve the minutes from the May 8, 2026 Executive Committee meeting.

Audit/Finance Committee • Jay Alexander, Chair

- Action Needed: Lease for PA CareerLink® Centre County

The Audit/Finance Committee will meet as needed.

EARN Committee • Kenneth Chappell, Chair

The EARN Committee will meet as needed.

Governance Committee • Dave Zartman

The Governance Committee will meet as needed.

Personnel Committee • Michele Foust, Chair

The Personnel Committee will meet as needed.

Policy and Performance Committee • Jim Beamer, Chair

- Action Needed: Policy on Policies
- Action Needed: Monitoring Policy
- Action Needed: WIOA Title I Program Complaint Policy & Procedures
- Action Needed: Conduct at PA CareerLink® Policy
- Action Needed: The Link Contract

The Policy and Performance Committee will meet as needed.

Youth Committee • Jon Ritter, Chair

- Action Needed: In-School Youth Contract

The Youth Committee will meet November 10, 2026.

Executive Committee

Meeting Minutes

May 8, 2026

The Executive Committee of Advance Central PA held a Zoom Video Conference meeting on Friday, May 8, 2026.

The following members attended:

Jay Alexander
Jim Beamer
Kenneth Chappell
Michele Foust
Jonah Howe
Robert Postal
Jon Ritter
Dave Zartman

The following members were excused:

None

The following staff attended:

Korrie Lucas
Erica Mulberger
Kelly Walter

The following guests attended:

Proceedings

The meeting was called to order at 10:03 a.m. by Jonah Howe, Executive Committee Chair.

Public Comment

There was none.

Review & Approval of Meeting Minutes

-  Jim Beamer made a motion to approve the April 10, 2026 Executive Committee meeting minutes. Jay Alexander seconded the motion. The motion was unanimously approved with no abstentions.
-  Dave Zartman made a motion to approve the minutes from the special April 24, 2026 Executive Committee meeting. Ken Chappell seconded the motion. The motion was unanimously approved with no abstentions.

Executive Committee Updates & Action Items

Audit/Finance Committee

Jay Alexander, Audit/Finance Committee Chair, provided the update and reported the Committee met on April 29, 2026, to review the FY25 Audit.

Financial Reports

Jay shared the financial reports through March 31, 2026 and the Obligation Report through April 26, 2026. Compared to FY25 at this time last year, Individual Training Accounts (ITA) are down 11%, (107 in FY26 to 119 in FY25) and On-the-Job Training Accounts (OJT) are down 16% (32 in FY26 to 37 in FY25).

Business and Education Partnership

Advance Central PA received state approval to extend the Business and Education Partnership grant from June 30, 2026, through December 31, 2026. The extension will allow remaining funds to be fully expended and help bridge the funding gap until the next round of Business and Education Partnership grants are released.

Single Audit

Jay provided an overview of the Committee's discussion and the presentation from Chris Shirock from Young, Oakes, Brown, and Company regarding the completed Single Audit Report; a summary document was provided in the meeting packet. Jay commended the staff for their tremendous work and strong audit that resulted in a clean report with no findings.

-  Jay Alexander made a motion to accept the Single Audit for Fiscal Year 2025 as presented by Young, Oakes, Brown & Company P.C. Commissioner Rob Postal seconded the motion. The motion was unanimously approved with no abstentions.

Workforce Innovation and Opportunity Action (WIOA) Allocation

The next Audit & Finance Committee meeting will be scheduled to review the FY27 budgets.

Erica Mulberger, Advance Central PA Executive Director, shared that Advance Central PA was recently informed that the WIOA allocation will be nearly level to FY26, with a 0.79% decrease in funding. She noted this is good news but also reminded the members that significant cuts to the allocation were received in FY26.

EARN Committee

Ken Chappell, EARN Committee Chair, provided the update.

EARN Enrollment Updates

There were 265 new enrollments between July 1, 2025 through April 28, 2026, nearly level to the same timeframe in the prior year. However 116 of the new enrollments this year are SNAP Only cases; a significant increase from the 28 total SNAP Only cases in the entire prior program year.

Advance Central PA will remain in close coordination with Department of Human Services (DHS), as SNAP-Only contract funds may not be sufficient to cover the full program year. At the end of March, Central Susquehanna Opportunities (CSO) had approximately \$12,000 remaining in its SNAP EARN budget.

EARN Contract Update

The contract for EARN services with CSO has exhausted its annual renewals. A new procurement was necessary to ensure Advance Central PA has the best provision of services possible. The request for proposals for EARN service delivery was released on February 13, 2026 with the submittal deadline March 23, 2026.

An Evaluation Committee including Bruce Jones, in addition to Advance Central PA staff individually read and rated each proposal before meeting for discussion on April 27. The consensus was that CSO's proposal was the strongest, showing demonstrated capacity and strategies to deliver comprehensive family-centric services to the target population while maintaining compliance. Negotiation points include the budget and operational components. If awarded to CSO, Advance Central PA will also incorporate updated contract language with more focus on outcomes so that credentialing and job readiness are improved, consequentially leading to higher placement performance.

 **Commissioner Rob Postal made a motion to negotiate and award a contract for EARN Services to Central Susquehanna Opportunities (CSO) for the nine counties of the Central Region from July 1, 2026 through June 30, 2027, with a budget to be negotiated by staff, and an option to extend funding annually for up to four years through June 30, 2031. Jay Alexander seconded the motion. The motion was unanimously approved with no abstentions.**

Commissioner Postal questioned the budget and operational components that are up for negotiation. Erica responded that while CSO has historically stayed within the available EARN budget, their proposal was higher than anticipated. Staff will negotiate changes as necessary to get the budget in line.

Commissioner Postal requested clarification on the definition of SNAP Only; Erica responded these are individuals who receive nutritional assistance benefits but do not receive cash assistance. He also noted the large variance in SNAP Only enrollments across the region and inquired as to why.

Ken responded, noting that participation varies based on a number of factors. For example, the type and level of benefits a household receives can impact an individual's decision to comply; a reduction in benefits for a larger household, of seven to six members, has less of an impact than for a single-person household, where benefit changes are more significant. Ken also explained that participants may meet work requirements through avenues outside of EARN programming. Advance Central PA and the County Assistance Offices (CAOs) work collaboratively to ensure referrals to EARN are appropriate.

EARN Statement of Work

Advance Central PA has a new contract with the PA Dept. of Human Services (DHS) to continue providing EARN services. This new statement of work includes refinements to program requirements, data entry and reporting standards, and performance and validation measures that guide service delivery and accountability. DHS will be providing formal training on June 6.

The EARN Committee will meet as needed.

Governance Committee

Erica Mulberger, Advance Central PA Executive Director, provided the update due to a vacancy in the Committee Chair role.

Recruitment and Membership Renewal

Seven members have terms that are ending this year, five members are seeking renewal and two members are not seeking reelection due to conflicts with overlapping meetings: Steve Stumbris and Talia Beatty.

Additionally, Erica reminded the Committee that Susan Swartz announced her retirement effective April 17, creating a vacancy for the required member representing the Office of Vocational Rehabilitation (OVR). Erica has contacted OVR and is awaiting a response regarding a potential candidate.

Due to overall decreased WDB membership, two (2) appointments are needed to restore compliance with the federal requirement that more than 50% of Board members represent business. Erica noted that she is seeking candidates with a regional perspective who will serve in the best interest of Advance Central PA and to send recommendations.

Leadership

The Vice-Chair role is vacant and should be filled to help plan for the end of Jonah's term as WDB Chair in December 2027.

Additionally, the Governance Committee Chair remains vacant. WDB members that do not hold officer positions (Chair, Treasurer, Vice Chair) are needed.

The Governance Committee will meet as needed.

Personnel Committee

Shelly Foust, Personnel Committee Chair, provided the update.

Staffing Update

Shelly noted no staffing changes to report. Staff continues to monitor whether the vacant PA CareerLink® Site Administrator position for Centre and Mifflin counties should be filled or if the staffing model should be adjusted from three positions to two going forward.

The Committee will meet to discuss potential COLA and merit-based increases pending available funds.

Policy and Performance Committee

Jim Beamer, Policy and Performance Committee Chair, provided the update.

Local Monitoring

Jim noted two local monitoring cycles successfully closed in April, operations monitoring of PA CareerLink® Columbia/Montour Counties and The Link. PA CareerLink® Operations monitoring for two additional sites, Centre County and Mifflin County, are in progress. Monitoring of the Adult/Dislocated Worker programs, Operator, and In-School Youth are also underway.

State Monitoring

The Dept. of Labor & Industry (L&I) initiated the following monitoring in April: TANF Youth Development and WIOA file monitoring.

Local Policies

Several local policies require updates for continued improvement and to mirror changes at the state and federal level. Staff are seeking technical assistance from L&I on some items and are preparing edits to propose to the Policy & Performance Committee at a meeting to be determined.

Youth Committee

Jon Ritter, Youth Committee Chair, provided the update.

In-School Youth (ISY) program operated by Central Susquehanna Opportunities, Inc. (CSO)

Jon noted PY25 Q3 outcomes for the In-School-Youth Bridges to the Future program and specifically reviewed the following.

The annual goal for Comprehensive Registrations has been exceeded. During the first three quarters, there were 55 Specialized Registrations toward an annual goal of 135. Historically, Specialized Registrations increase during the spring as participants enroll in paid summer internships.

Camp STEAM completion is on track, with 44 participants completed to date toward an overall goal of 93. An additional Camp STEAM session is scheduled to take place later this month.

The Paid Work Experience metric includes both program-subsidized paid internships, and staff-assisted unsubsidized employment placements, in accordance with the motion approved at the December WDB meeting. To date, there have been 49 paid work experiences toward a goal of 75, including 3 staff-assisted unsubsidized employment placements. Paid work experience typically increases during the fourth quarter, as most in-school youth participants complete these activities during the summer months.

Additionally, 1 Business Challenge was held during the third quarter with 4 comprehensive participants, and additional Business Challenge events are scheduled for the fourth quarter.

Out-of-School Youth (OSY) program operated by Central Susquehanna Intermediate Unit (CSIU)

Jon reviewed PY25 Q3 outcomes for the Out-of-School Youth- YES to the Future program and specifically reviewed the following.

Program registrations are on target for the quarter, with 146 WIOA registrations, and a goal of 200.

WIOA paid internships are under target, with 22 participants engaged and an annual goal of 60. Difficulty in meeting this goal has been attributed to lower business engagement with business citing they do not have capacity to host an intern. OJT goals are also under target, with five attained with a goal of 12.

In-School Youth (ISY) Contract

An RFP for TANF Youth Development In-School Youth programming was released on April 24, 2026 with proposals due May 27, 2026. This solicitation covers the period from July 1, 2026 – June 30, 2027 with renewal options possible on an annual basis through June 30, 2030.

Out-of-School Youth (OSY) Contract

Following approval by the Executive Committee in April and planned ratification by the WDB in June, Advance Central PA is beginning contract negotiations with the Central Susquehanna Intermediate Unit (CSIU) for a new Out-of-School Youth (OSY) contract that will take effect on July 1, 2026.

Business Education Partnership Grant Update

As previously mentioned, a new Business Education Partnership grant is anticipated to be released. Staff are watching closely so that an application can be submitted and will plan to discuss ideas for the grant at the upcoming Youth Committee Meeting.

The next Youth Committee meeting will be May 13.

Executive Director Update

Erica Mulberger, Advance Central PA Executive Director, provided the update.

PA CareerLink® Lycoming County Lease

A termination notice was sent to the current landlord informing him of intent to relocate. He did reply to discuss potential options for negotiations. However, we have previously requested improvements, including new flooring and necessary electrical work, which have not been addressed. Further, the fiscally responsible choice is to move.

L&I provided a letter confirming that funding had been reduced by 20% which was sent with the termination notice. Under the terms of our lease, a 10% reduction allows Advance Central PA to exercise the funding out clause.

A lease for the new space has been signed and is currently under review by the new landlord's legal counsel.

Potential layout modifications have been discussed with the new landlord, who is currently completing renovations to the space. Planned improvements include the addition of a breakroom, new flooring, updated ceiling tiles, bathroom enhancements, and other upgrades.

Jonah noted that the move offers numerous benefits, including a clean, modern workspace, improved staff well-being, substantial cost savings, and a brighter work environment. He suggested the move will be positive for the staff and customers.

WIOA Reauthorization- A Stronger Workforce for America (ASWA) is Reintroduced

Erica gave an update on the reintroduction of the A Stronger Workforce for America Act. If enacted in its current form, the legislation would have a significant negative impact on local workforce development operations. One of the most notable changes is the proposed requirement that 50% of Adult and Dislocated Worker funds and 12.5% of Youth funds would have to be allocated for training expenses.

Erica was asked to provide insight into appropriate budgeting levels under the proposed changes.

Erica noted that the bill is unlikely to advance to a full House vote without further modifications. She expressed optimism that ongoing advocacy efforts and conversations with legislators are making an impact and that revisions will likely be made before final approval.

Commissioner Postal expressed concern that the bill's definition of "training" is as significant an issue as the proposed funding allocation requirements. There are questions regarding which activities will qualify as training under the legislation and how the definition may affect local service delivery and program operations. Erica agreed clarification on what expenditures and activities will count toward the training mandate will be critical.

Open Discussion

Members thanked Erica for her advocacy efforts; ongoing communication with legislative offices will help ensure that the concerns and perspectives of local workforce development stakeholders are being heard.

Members also noted the success in having legislative office attendance at WDB meetings.

Date of Next Meeting

Annual Meeting of the Members/LEO Prep Meeting – June 17, 2026 @ 9:00 am, at the Union County Government Center in Lewisburg

WDB/LEO Joint Meeting – June 17, 2026 @ 10:00 am, the Union County Government Center in Lewisburg Executive Committee Meeting – August 14, 2026 @ 10:00 @ Advance Central PA office in Lewisburg

Adjournment

With no further business to discuss, Jonah adjourned the meeting at 10:47 a.m.

Respectfully Submitted,



Kelly Walter, Office/Board Coordinator

FY26 CONSOLIDATED TRAINING CONTRACT OBLIGATIONS
As of 6/30/2026

Fund Source	Budget	Encumbrance	Actual	Total Obligation	Budget Available for Encumbrance	Number of Participants	Percentage of Total Budget Obligated
INDIVIDUAL TRAINING ACCOUNTS (ITAs)						FY26 ITA	
Adult	\$21,600	\$0	\$0	\$0	\$21,600	0	0.00%
Adult POS	\$208,400	\$8,691	\$178,564	\$187,255	\$21,145	85	89.85%
Dislocated Worker	\$76,890	\$0	\$70,625	\$70,625	\$6,265	21	91.85%
NDWG	\$49,037	\$0	\$44,640	\$44,640	\$4,397	12	91.03%
TOTAL ITA	\$355,927	\$8,691	\$293,829	\$302,520	\$53,407	118	85.00%

ON THE JOB TRAININGS (OJTs)						FY26 OJT	
Adult	\$62,400	\$17,495	\$8,453	\$25,948	\$36,452	3	41.58%
Adult POS	\$72,600	\$14,455	\$45,381	\$59,836	\$12,764	12	82.42%
Dislocated Worker	\$59,593	\$6,672	\$46,097	\$52,768	\$6,825	7	88.55%
Out of School Youth	\$155,000	\$23,676	\$49,917	\$73,593	\$81,407	14	47.48%
TOTAL OJT	\$349,593	\$62,298	\$149,848	\$212,146	\$137,447	36	60.68%
TOTAL ITA/OJT	\$705,520	\$70,989	\$443,677	\$514,666	\$190,854	154	72.95%

INCUMBENT WORKER TRAINING						Number of Participants	Percentage of Total Budget Obligated
Fund Source	Budget	Encumbrance	Actual	Total Obligation	Budget Available for Encumbrance		
Agriculture	\$102,052	\$0	\$7,411	\$7,411	\$94,641	22	7%
Construction	\$134,170	\$0	\$65,829	\$65,829	\$68,341	389	49%
Total	\$236,222	\$0	\$73,241	\$73,241	\$162,981	411	31%

FY27 CONSOLIDATED TRAINING CONTRACT OBLIGATIONS

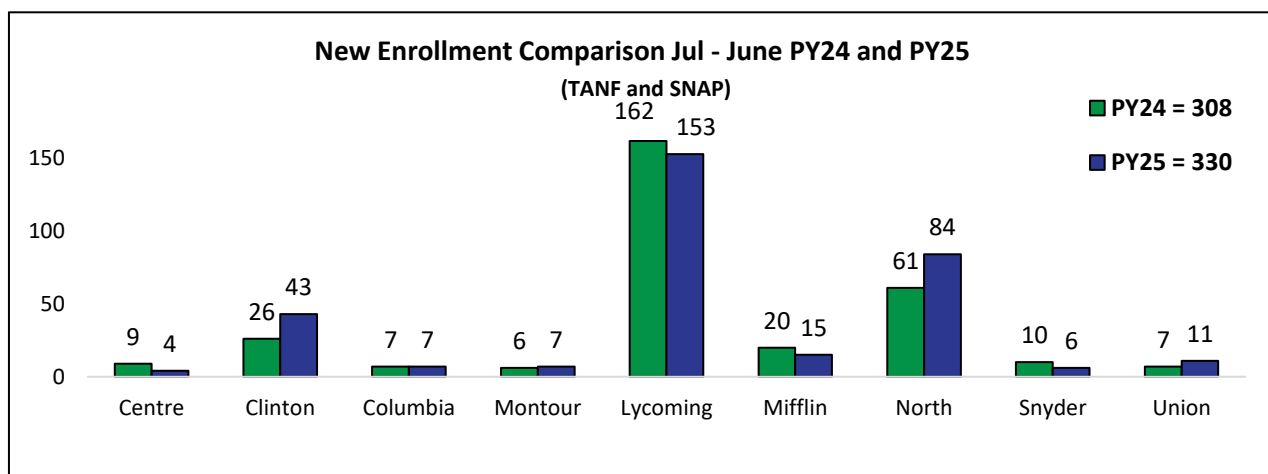
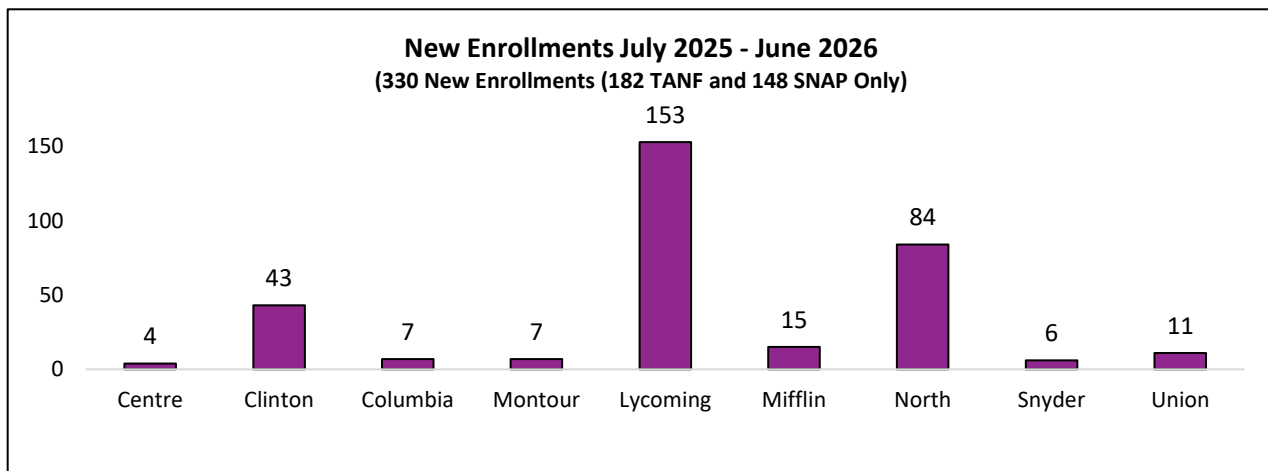
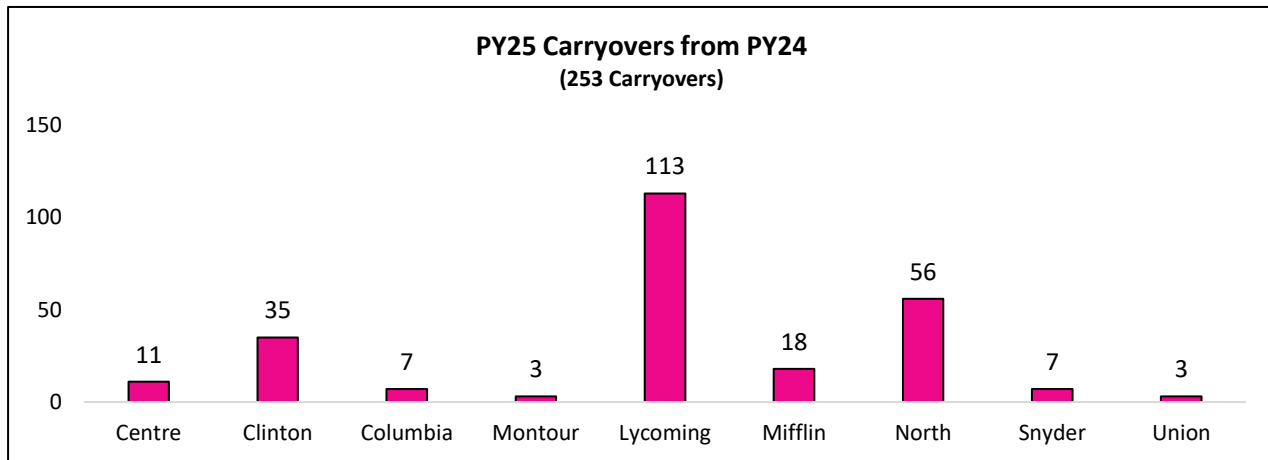
As of 7/27/2026

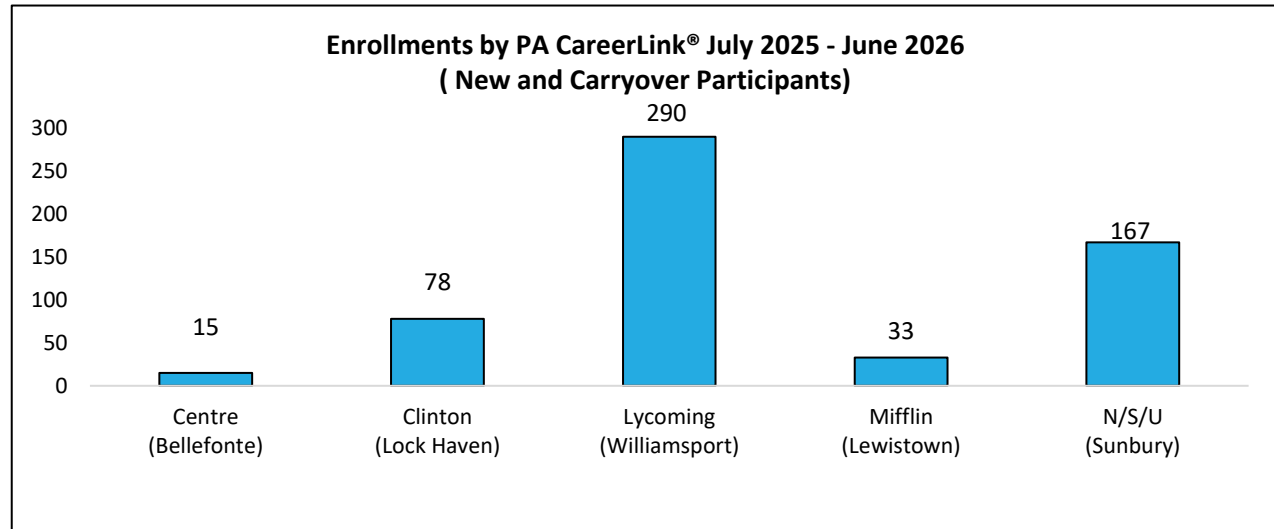
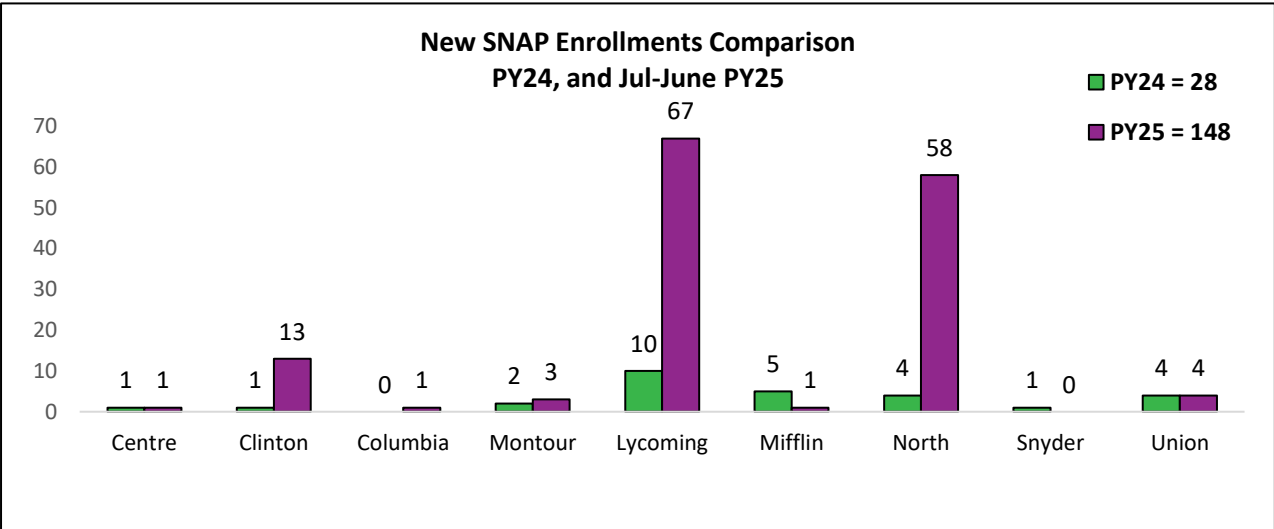
Fund Source	Budget	Encumbrance	Actual	Total Obligation	Budget Available for Encumbrance	Number of Participants	Percentage of Total Budget Obligated
INDIVIDUAL TRAINING ACCOUNTS (ITAs)						FY27 ITA	
Adult	\$49,753	\$0	\$0	\$0	\$49,753	0	0.00%
Adult POS	\$199,013	\$8,530	\$0	\$8,530	\$190,483	3	4.29%
Dislocated Worker	\$69,103	\$1,530	\$0	\$1,530	\$67,573	1	2.21%
TOTAL ITA	\$317,869	\$10,060	\$0	\$10,060	\$307,809	4	3.16%

ON THE JOB TRAININGS (OJTs)						FY27 OJT	
Adult	\$132,675	\$0	\$0	\$0	\$132,675	0	0.00%
Adult POS	\$46,068	\$0	\$0	\$0	\$46,068	0	0.00%
Dislocated Worker	\$166,677	\$0	\$0	\$0	\$166,677	0	0.00%
Out of School Youth	\$378,589	\$0	\$0	\$0	\$378,589	0	0.00%
TOTAL OJT	\$724,010	\$0	\$0	\$0	\$724,010	0	0.00%
TOTAL ITA/OJT	\$1,041,879	\$10,060	\$0	\$10,060	\$1,031,819	4	0.97%

INCUMBENT WORKER TRAINING						Number of Participants	Percentage of Total Budget Obligated
Fund Source	Budget	Encumbrance	Actual	Total Obligation	Budget Available for Encumbrance		
Agriculture	FY26	\$102,052	\$0	\$7,411	\$94,641	22	7%
	FY27					0	
Construction	FY26	\$134,170	\$0	\$65,829	\$68,341	389	49%
	FY27					0	
Total	\$236,222	\$0	\$73,241	\$73,241	\$162,981	411	31%

EARN Program Year 2025-2026 Enrollment Report





DRAFT



Policy on Policies

Advance Central PA's Policy Governance Framework

Implemented July 2026

Developed by:
Central Pennsylvania Workforce Development Corporation, dba Advance Central PA

Advance Central PA is an equal opportunity employer/program. Auxiliary aids and services available upon request to individuals with disabilities. Program funded with federal dollars. For more information, visit: <https://advancecentralpa.org/about-us/public-notices/>

Policy on Policies

Background

This Policy on Policies establishes a standard framework and process for developing, managing, and decommissioning of Advance Central PA policies. This policy ensures organizational accountability, transparency, and continuous improvement across the workforce development system and is developed in alignment with the PA Dept. of Labor & Industry Workforce System Policy by the same name: Policy on Policies.

This policy applies to Advance Central PA workforce policies.

Policy Categories

Advance Central PA categorizes policies into distinct categories as shown below along with the standing committee of the Workforce Development Board that may be charged with approval.

Category	Relevant Committee(s)
Financial Management	Audit/Finance
Program Management	Policy & Performance EARN Youth
Risk Management	Policy & Performance
Human Resources	Personnel

Policy Development and Revisions

A new policy or a revision to an existing policy may be triggered for many reasons, including but not limited to: new or changing federal or state regulation/legislation, monitoring findings, opportunities for continuous improvement and efficiencies, and new grants that are obtained.

Advance Central PA staff work collaboratively to develop, implement, and manage workforce system policy as outlined herein. Policies will utilize a standard format including documentation of the most recent revision/publish date.

Policies and revisions will be drafted by Advance Central PA staff and vetted internally by the Assistant Director and/or Executive Director and approved.

- New policies and substantive changes to existing policies will be brought to the appropriate standing committee of the Workforce Development Board for approval and the Executive Committee or full WDB for ratification unless they qualify as “fast-track”.
- Fast-track is an expedited process used to implement or revise policy when specific situations require immediate and/or clear action. Advance Central PA maintains authority to implement required policy outside the policy development processes outlined herein.

Situations that warrant fast-track status include but are not limited to:

- Non-substantive changes to existing policy such as formatting, updating hyperlinks, correcting typographical errors, etc.
- Federal or state mandates, directives, or policy changes that require immediate implementation with no local discretion
- New grants obtained that require specific policies tied directly to approved budgets with no additional local discretion, such a support service policy for a competitive grant which has a budget that outlines the amounts available.

Any policy enacted/revised under fast-track circumstances will be routed back through the regular annual review processes.

Documentation of Annual and Other Reviews

Advance Central PA will conduct an annual review of each active workforce system policy to ensure compliance and continued alignment with federal and state directives and local expectations. Additional reviews will be completed as necessary.

A **Policy Log** is maintained to detail policy implementation dates and annual review dates thereafter. Detail will be maintained as follows.

- New policies will be added to the log and document the implementation month/year along with whether it went through the regular approval process or the fast-track.
- When a review is complete and the policy is determined not to require any changes, the review month/year will be entered on the Log with a comment: Annual review completed. No revisions were required.
- When a review is complete and non-substantive changes are determined necessary, those changes will be made by staff with approval from either the Assistant Director or Executive Director. The review date will be entered on the Log with a comment: Annual review completed. Non-Substantive revisions were made including [insert a brief summary of changes, such as changing links, correcting spelling, re-arranging bullets, etc.]
- When a review is complete and substantive revisions are necessary, the log will be updated to include the month/year of the review, implementation month/year of those revisions, and whether it went through the regular review process or the fast-track.

Additionally, each policy will have a **Review Log** section that shows the annual reviews completed since the latest published revision.

Decommissioning of Policies

Policies that outlive their applicability due to changes in federal or state law, or changes in the larger landscape of Pennsylvania and or local workforce system programs, principles, or service-delivery processes, will be decommissioned.

The Advance Central PA Executive Director will review the recommendation to decommission a policy. Upon approval, the policy will be removed from SharePoint and notice will be sent to the policy's audience and any other affected parties and/or workforce system partners.

Review Log

Including annual reviews since the latest published revision.

Date of Review	Annual Review
7/2027	TBD

DRAFT



MONITORING POLICY MANUAL

Revised July 2026

Developed by:
Central Pennsylvania Workforce Development Corporation, dba Advance Central PA

Advance Central PA is an equal opportunity employer/program. Auxiliary aids and services available upon request to individuals with disabilities. Program funded with federal dollars. For more information, visit:
<https://advancecentralpa.org/about-us/public-notices/>

MONITORING POLICY MANUAL

Overview

Purpose

Established as the fiscal agent for Workforce Innovation and Opportunity Act (WIOA) Title I and Pennsylvania Department of Human Services funds, Advance Central PA is responsible for overseeing, measuring, monitoring and determining compliance with implementation, operations and performance requirements for all contracted funds. Advance Central PA establishes guidelines designed to ensure that quality of services meet expectations. Further, Advance Central PA develops policies and methodologies for the reporting of performance on a routine and ongoing basis. To fulfill these obligations, Advance Central PA will perform the following duties on a regular basis:

- Objectively review program activities, operations, administrative, and fiscal practices of entities who contract with Advance Central PA to provide services or training.
- Identify existing or potential deficiencies and ensure required action plans are implemented
- Make recommendations on improvements to customer service and quality and highlight promising practices that are observed.

Goals

Advance Central PA sets these goals as an end result to any review or monitoring:

- Ensure program compliance in accordance with federal and state funding stream guidelines and Advance Central PA Policies.
- Promote program consistency and standardization
- Support efforts for continued improvement in program implementation
- Identify deficiencies and ensure corrective actions are put into place
- Initiate policy development and recommend procedural modifications
- Identify training and technical assistance needs
- Acknowledge promising practices

Components

Monitoring focuses on the following distinct areas.

1. Compliance
This component examines adherence to contract requirements, laws and regulations. The monitoring report must clearly state the deficiencies found and the actions required.
2. Quality
It is important to look beyond compliance and focus on the quality of services being delivered relative to costs. The monitor may make recommendations for improvement on processes and service delivery and/or recognize promising practices. Spotlighting promising practices acknowledges good work and also provides models of service delivery for the rest of the Region.
3. Performance
The monitor provides up to date information and reports to evaluate the likely outcome of program goals and performance standards. Analyzing performance reports helps to identify potential deficiencies and ensure positive future outcomes.

4. Technical Assistance

Questions often arise during monitoring, and technical assistance is delivered in order to help subcontractors clarify law or policy. The monitor will note technical assistance in the final monitoring report.

Types of Contracts Monitored

For effective and in-depth quality assurance reviews, each of the areas outlined below are evaluated on an on-going basis.

Conducted by Advance Central PA Fiscal Department

Entity use of Advance Central PA funds are monitored annually for non-discretionary grants. Entity uses of discretionary funds are monitored based on grantor requirements.

Areas examined include, but are not limited to:

- financial and internal control systems
- cash management
- payroll
- procurement
- property
- audit and internal monitoring
- separation of duties
- insurance coverage

Monitoring can take place more often than annually if deemed necessary. Standards are set by the United States Office of Management Budget Circulars, USDOL, the Commonwealth of Pennsylvania, Advance Central PA, and other granting agencies.

Conducted by Advance Central PA Operations Department

Key components of monitoring can include:

- On-site visits- can include direct observations, staff and customer interviews.
- File reviews- examinations of individual participant files, including those collected via random sampling.
- Desk reviews- collection of data and information as part of the monitoring process; can be stand-alone or part of the overall process to prepare a monitor for a site visit. Examples of documents that can be reviewed prior to a visit include, but are not limited to, sub-grant agreements, contracts, previous monitoring reports, corrective action plans, business plans, budgets, actual expenditures, property database, performance reports and other data points, and CWDS service record and case notes.
- Random sampling- selection of samples to be used to help identify compliance violations, questioned costs and/or potential weaknesses in performance.
- Surveys- may be used to help identify compliance violations, questioned costs or potential weaknesses in performance, as well as to capture promising practices or needs for technical assistance.

Additionally, a service provider's programmatic activities are monitored quarterly by way of a Quarterly Self-Monitoring report received from providers and reviewed by Advance Central PA staff. Specific requirements for Self-Monitoring reports are outlined in contract riders.

Advance Central PA conducts monitoring as detailed below.

1. PA CareerLink® Operations

Each PA CareerLink® site is assessed for compliance including access to services, quality, and performance **at least biennially**. Monitoring activities include on-site visits with direct observations staff interviews, and desk reviews. Additionally, monthly reports developed by Advance Central PA and completed by PA CareerLink® staff which include PA CareerLink® usage information, job seeker and employer participation data, and Rapid Response activities are reviewed by Advance Central PA staff and provided to WDB members. Standards are set by federal law, Commonwealth directives and policies, and Advance Central PA policies.

2. PA CareerLink® Operator

Monitoring of the Operator will be conducted at least annually and include the following: collecting and reviewing adherence to contract provisions, distributing and analyzing partner surveys, and other performance measures developed by Advance Central PA and consistent with PA CareerLink® certification requirements, such as evidence of continuous improvement.

3. WIOA Title I Adult/Dislocated Worker

A formal file review including a review of the overall program and delivery is conducted **at least once per program year** based on federal law, Commonwealth directives and policies, and Advance Central PA's contract rider(s) with the subrecipient(s) in addition to local policies.

Programmatic oversight occurs regularly via the Adult Program Coordinator staff. This includes formal monthly grant management meetings where service delivery, operations, data, and performance is proactively reviewed and strategized. Performance is specifically reviewed regularly, including thorough review of Common Measure denominator reports. Findings and concerns from this informal monitoring may be included in the formal annual monitoring or be factored into the risk assessment.

Additionally, a desk review is conducted for all participant cases with pending training contracts by the Contracts Coordinator with other staff as needed.

4. Adult Priority of Service (POS)

Quarterly reports are compiled to ensure that 51% or more of Adult training funds are being spent on POS participants. If the POS performance reveals that not enough funding is being provided to POS participants, Advance Central PA's fiscal department will restrict funding to Adult customers who meet POS until a proper balance is re-established.

5. WIOA Title I and TANF Youth Development Youth Programs

Formal file reviews including a review of the overall program and delivery is conducted at least once per program year for both Out-of-School and In-School Youth programs; based on federal law, Commonwealth directives and policies, and Advance Central PA's contract rider(s) with subrecipient(s).

Advance Central PA monitors youth work experiences for compliance and quality of services by means of site visits, interviews and desk reviews. The number of experiences monitored per program year is informed by program risk assessments or otherwise identified concerns.

Programmatic oversight occurs regularly via the Youth Programs Coordinator staff. This includes formal monthly grant management meetings where service delivery, operations, data, and performance are proactively reviewed and strategized. Performance is specifically reviewed regularly, including thorough review of Common Measure denominator reports for

WIOA youth. Findings and concerns from this informal monitoring may be included in the formal annual monitoring or be factored into the risk assessment.

Additionally, a desk review is conducted for all participant cases with pending training contracts by the Contracts Coordinator, with other staff as needed.

6. EARN (Employment And Retention Network) Program TANF and SNAP Only

File reviews are conducted annually and are based on federal Law, Pennsylvania Department of Human Services (DHS) policies and directives, and Advance Central PA's EARN contract rider(s) with subrecipient(s).

Programmatic oversight occurs regularly via the Adult Program Coordinator staff. This includes formal monthly grant management meetings where service delivery, operations, data, and performance are proactively reviewed and strategized.

Performance and operations are reviewed regularly outside of the formal monitoring, with Advance Central PA staff conducting regular oversight with desk reviews in order to submit required documentation to DHS each month, including for monthly desk reviews, performance reviews, and TANF Samples. Findings and concerns from this regular oversight process may be included in the formal annual monitoring or be factored into the risk assessment.

7. On-the-Job Training (OJT) Contracts

The greater of three (3) new OJT employers or 20% of total new OJT employers will be monitored each quarter. On-site visits are conducted to ensure adherence with the OJT contract and ADA/EO reasonable accessibility. Subsequent visits may be necessary depending on location change or any suspected problems. Standards are set by Federal law, Commonwealth directives and policies, and Advance Central PA On-the-Job-Training Policy.

Programmatic oversight continues throughout the OJT, including as reimbursement requests are received.

OJT Employers are entities that are contracted "vendors," rather than contracted service providers.

8. Training Provider/Vendor

Each program year, training providers must post their training program applications on CWDS for WDB and state approval. Advance Central PA along with BWDA reviews each training provider's course application on CWDS annually. Each course description must show a connection to a High Priority Occupation. This annual process ensures the validity of each training program offered to participants.

Training providers are entities that are contracted "vendors," rather than contracted service providers. Site-monitoring of vendors is conducted on a risk assessment basis. Compliance with Advance Central PA's Universal Contract is examined along with EO/ADA reasonable accessibility.

9. Other Grants

Additional grants are monitored according to the regulations of the granting agency, Advance Central PA's proposal to said agency, and compliance with the resulting contract provisions.

Methodology

Schedule

A schedule is developed to encompass all grants that require monitoring each program year. The schedule will be approved by the Executive Director.

Provider Risk Assessment

Advance Central PA monitors providers based on the level of risk assessment with at least one formal monitoring conducted each program year. Risk assessment results determine the frequency and manner of the oversight including the size of the monitoring sample. Monitoring may occur as established in the local oversight plan or may be prompted by some event such as a complaint, poor performance, negative managerial patterns, or unusual EO data. Factors that Advance Central PA considers regarding risk assessment are as follow.

1. A service provider who was not contracted with Advance Central PA in the last year.
2. New provider personnel or new or substantially changed systems.
3. The extent and results of Federal awarding agency monitoring (e.g., if the sub-recipient also receives Federal awards directly from a Federal awarding agency)
4. Evidence that a provider's internal operational and/or fiscal controls are lacking effectiveness.
5. Results of a provider's recent single audit.
6. Size of a provider's share of Advance Central PA's allocation.
7. Number of program or EO complaints/issues in last calendar year

Risk Assessment is scored as outlined in the chart below.

Provider Risk Assessment		Provider Score
1.	When was the last time the provider contracted with Advance Central PA? 0 =current provider of same contract in a prior PY, 10 = no contract in prior PY	
2.	Does the provider have new personnel (management or program) or substantially changed systems? 0 = little or no change, 8 = some change, 15 = extensive change	
3.	Does the provider have a history of disallowed costs, major deficiencies, or other monitoring findings from Advance Central PA contracts or other known federal awards? 0 = no deficiencies, 15 = one instance, 25 = more than one instance	
4.	Does the provider lack effective operational and fiscal procedures and controls? 0= no instances of noncompliance , 5 = a single instance of noncompliance, 20 = more than 1 instance of noncompliance	
5.	What is the provider share of Advance Central PA's contracted dollars for the FY? 0 = Less than 10%, 8 = 10%-25%, 15 = 25% or more	
6.	What is the extent of Single Audit oversight findings for the past 2 years? 0 = no findings, 8 = single instance of noncompliance, 15 = substantial findings	
7.	Number of program or EO complaints/issues in last calendar year 0 = None, 25 = One or more instances	
Risk Level 0-46 Minimal Risk, 47-60 Moderate Risk, 60-100 High Risk		

Training Provider/Vendor Risk Assessment

Risk Assessment is scored as outlined in the chart below.

Risk Assessment Chart - for Vendors		Vendor Score
1	When was the last site visit by a Advance Central PA staff member? 0 = 1-2 Years Ago, 5 = 3-8 Years Ago, 10=Never	
2	Has management of vendor changed? 0 = Little or no change, 8 = Some change, 15 = Extensive change	
3	History of disallowed costs and/or major deficiencies? 0 = No deficiencies, 15 = One instance, 25 = More than one instance	
4	Share of Contracted ITA Dollars in Current FY 0 = Less than 10%, 8 = 10%-25%, 15 = 25% or more	
5	Number of program or EO complaints/issues in last calendar year 0 = None, 25 = One or more instances	
Risk Level	0-46 = Minimal Risk, 47-56 = Moderate Risk, 57-90 = High Risk	

Intent to Monitor

The Monitor notifies the entity (subcontractor or vendor) of an intent to monitor. This notification, at a minimum, provides the following information about the review:

- Reason (compliance, risk assessment, Advance Central PA's contractual obligations, etc.)
- Advance Central PA staff responsible for conducting the review
- Scope (dates of service, types of programs, locations, etc.)
- Date of the review. Before a scheduled site visit, a mutually agreed upon review time and date will be confirmed between both parties. In advance of the visit, the monitor may provide a list of files to be pulled and the monitoring tool to be used.
- Advance Central PA reserves the contractual right to request files for review without prior consultation with the subcontractor or vendor. Advance Central PA also reserves the right to monitor without notice or without furnishing specifics about the monitoring in advance.

Sampling Strategy for Participant File Reviews

When conducting file reviews, the following sampling strategy will be used. The population for each funding stream will be defined as the customers enrolled or actively participating in an eligible activity during the program year being reviewed.

From that population, a reasonable representative sample will be chosen for review. The size of the monitoring sample will be determined in accordance with assessed risk level and oversight requirements. A minimum of one file will be reviewed from each PA CareerLink® office for WIOA and TANF programs, if applicable. If, during a file review, a concern is identified that warrants additional case review, the sample size may be increased without advance notice to the service provider.

A typical sample size is estimated at 5%, though Advance Central PA may select a pre-defined volume of samples at random to be used to help identify compliance violations, questioned costs and/or potential weaknesses in performance.

Adult Priority of Service Monitoring

The percentage of Adult participants receiving statutory, discretionary and non-POS services will be reviewed with a minimum requirement to serve no less than 50.1% of participants who meet statutory POS, and a long term goal aligned with the US Department of Labor's vision to meet 75%. The percentage of Adult POS participants served will be included in the formal monitoring of Adult programming each program year. If the percentage of statutory POS Adults served is less than 50.1%, a corrective action plan will be required from the subcontractor.

Advance Central PA will budget according to training threshold requirements. On a quarterly basis, Advance Central PA will monitor training activity to ensure compliance with the minimum number of POS Adults accessing training services. The percentage of Adults who access training services registered under statutory, discretionary, and non-POS eligibility will be compared. If by January of each program year, Advance Central PA determines the percentage of POS Adults who access training represent an average of less than 30% of all Adults receiving training services, Advance Central PA will implement measures to cease registrations of non-priority groups and such determination will be re-analyzed each month thereafter.

Monitoring Tools

Specific tools to measure compliance and performance will be utilized for each monitoring area. These tools are developed by Advance Central PA or are adaptations of state and/or federal instruments. Tools are revised and updated as changes in governmental regulations or Advance Central PA policies warrant. Each tool references the policies, laws and guidelines for which the individual questions are based, as appropriate. Monitoring tools contain elements required in state policy as follow:

- Name of the agency
- Name of the individual performing the monitoring
- Date of the monitoring
- Services or activities provided
- Total amount of the contract and sources of the funding
- Date(s) of the oversight activity
- Staff interviewed
- Summary of the results that include program strengths, concerns, deficiencies and areas where technical assistance may be needed

Exit Conference

Within ten days after the conclusion of both the data collection process and site visit for formal annual/biennial monitoring, an exit conference is held with appropriate representatives of the Subcontractor. The participants in the exit conference discuss highlights of what will be in the report and any necessary clarification should be provided at that time.

Reporting

Reporting and Resolution Requirements for Service Providers

Monitoring will result in a written report, even if no required actions are required. Advance Central PA has a formalized reporting and follow up process for several reasons. First, it provides a transparent paper trail for future State and Federal monitoring. Second, it allows the monitor to remain objective with the data collected and findings uncovered. Third it provides a mechanism for alerting not only the provider staff of the findings but also creating awareness within their leadership structure. Finally, it allows Advance Central PA to directly attach the monitoring reports to the expectations outlined in contracts and program riders.

For monitoring to be effective, it must be results-oriented and lead to implementation of immediate required action to ensure accomplishment of goals and objectives, continuous improvement activities, and to ensure persistent review and enhancement of service delivery.

The Monitor is responsible for conducting visits and monitoring for compliance, identifying issues and best practices, and writing a draft report. The final report goes through an internal Advance Central PA management review, and if applicable, at least one other person representing the program or fiscal department prior to release. **Management** sends the final report to the entity being monitored with a copy to their leadership and the WDB Chairperson. A summary of monitoring results is shared with the following WDB Committees, as applicable, in addition to being presented to the Workforce Development Board and Local Elected Officials Board quarterly.

Area/Contract Monitored	Reviewing WDB Committee
Fiscal and Administrative	Audit Finance
PA CareerLink® Operations	Policy & Performance
OJT Employer	Policy & Performance
Adult and Dislocated Worker Programs	Policy & Performance
Youth Programs	Youth Committee
Department of Human Services	EARN Committee
Other Grants	Relevant Committee, or if none, Executive
Vendor/Training Provider Monitoring	Policy & Performance

The monitored entity has 30 days to submit a corrective action plan (CAP) to Advance Central PA unless otherwise specified. Advance Central PA will confirm whether the plans are approved or require revision.

In the event of a finding related to a violation of the non-discrimination and equal opportunity provisions of WIOA, the guidelines outlined in 29 CFR §38.91-38.93 will be strictly adhered to, including formal notice to the Commonwealth. The 30-day response time is not applicable in such an instance, as urgent and immediate response is necessary in this case.

If Advance Central PA does not receive a response within the time period outlined in the monitoring report and/or deficiencies in compliance and/or quality continue, the respective WDB Committee exercises the right to recommend Breach of Agreement procedures be enacted as outlined in the respective contract.

There may be occasions when the severity or number of required actions would require a follow up monitoring visit or desk review to provide evidence of program or fiscal improvement. During the follow up review, small samples of customer files will be pulled and supplementary site visits or other activities will be conducted that provide evidence that required actions have been implemented successfully.

If a monitor observes that a particular aspect of Advance Central PA Policy is outdated or is unnecessarily causing customer service to suffer, modifications to Policy may result.

The following table provides an outline of the components of the monitoring report issued to service providers along with the expectations for each.

Terms	Meaning	Subcontractor Expectation
Contract Requirement	Language in Advance Central PA contract that is being referenced.	Understand that this is the standard by which the contract is monitored.
Reference	The law, policy or notice (such as an email from Labor & Industry) that issued this requirement.	Understand that reference language is used as a standard to which the contract is held.

Findings	Observations from the monitoring.	An observation in itself may or may not require a response.
Findings and Required Actions	Deficiencies identified that reveal non-compliance with applicable - Federal, state or Advance Central PA regulations, terms and conditions of an award or contract, - Federal, state or Advance Central PA policies and official directives.	Written response to Required Action within 30 days unless a violation of the non-discrimination and equal opportunity provisions of WIOA is found in which case immediate actions are required according to 29 CFR §38.91-38.93
Concerns and Recommendations	Issues, policies, or practices observed that are classified as “risk areas” or “red flags” that, if not corrected, could lead to an area of non-compliance in future monitoring. Each area of concern may have a corresponding recommendation for improving the issue/practice.	Although they require a written response, recommendations are not required actions, but subcontractors are encouraged to implement the recommendation for the purpose of improving the issue/practice.
Promising Practice	A recognized example of standard expected practice and/or innovative practice that exceeds expected standards.	Share with staff in order to highlight the promising practice and encourage continued/expanded use in order to improve service implementation.

Reporting and Resolution Requirements for OJT Employers and Training Providers

Employers are issued a post-visit letter by management only if there are any contractual concerns or deficiencies resulting from the site visit. The letter will address the areas of deficiency and detail what must be corrected to ensure the entity’s continued potential eligibility as an OJT employer with access to Advance Central PA funding, including for present and future OJTs.

Training providers are issued a post-visit letter by management only if there are any contractual concerns or deficiencies resulting from the site visit. The letter will address the areas of deficiency and detail what must be corrected in order to ensure the entity’s continued eligibility as a training provider with access to Advance Central PA funding.

Monitoring Records

Electronic copies are stored in the monitoring directory on the network. Monitoring records are maintained in accordance with the retention policy of each grant.

Review Log

Including annual reviews since the latest published revision.

Date of Review	Annual Review
June 2022	Annual review completed. No revisions were required.
June 2023	Annual review completed. No revisions were required.
June 2024	Annual review completed. No revisions were required.
June 2025	Annual review completed. No revisions were required.



WIOA Title I Complaint and Grievance Procedures and Appeals Process Policy

For WIOA Title I Program Complaints and Grievances

Revised July 2026

Developed by:
Central Pennsylvania Workforce Development Corporation, dba Advance Central PA

Advance Central PA is an equal opportunity employer/program. Auxiliary aids and services available upon request to individuals with disabilities. Program funded with federal dollars. For more information, visit: <https://advancecentralpa.org/about-us/public-notices/>

Advance Central PA WIOA Title I Program Complaint and Grievance Procedures and Appeals Process Policy

Purpose

In compliance with the Workforce Innovation and Opportunity Act (WIOA) of 2014 and for any other federal or state contracts passed through Advance Central PA, the Workforce Development Board for the Central Pennsylvania Local Workforce Development Area has implemented this WIOA Title I **Program Complaint and Grievance Procedures and Appeals Process Policy** outlining a uniform process for receiving, processing, resolving, and appealing complaints and grievances alleging violations of the requirements of WIOA Title I.

These procedures are established pursuant to:

- WIOA Section 181(c) Grievance Procedure
- WIOA Section 188 Nondiscrimination
- 20 Code of Federal Regulations (CFR) Part 683 Subpart F_ Grievance Procedures, Complaints and State Appeals Processes (20 CFR 683.600-620)
- 20 CFR 38 Implementation of the Nondiscrimination and Equal Opportunity Provisions of the WIOA
- Pennsylvania Department of Labor and Industry's (L&I) Office of Equal Opportunity (OEO) Nondiscrimination Plan
- Other applicable federal and state law and regulation

Regulatory (20 CFR 683.600)

Each Local Workforce Development Area, State, outlying area, and direct recipient of WIOA Title I funds (except Job Corps) must establish and maintain written grievance and complaint procedures.

This Policy is Implemented to Include Key Requirements:

- Establish a formal grievance and complaint process for WIOA Title I programmatic complaints.
- Provide information about complaint procedures to participants, partners, service providers, and other interested parties.
- Ensure complaint information is understandable to all affected individuals, including youth and individuals with limited English proficiency (LEP).
- Provide an opportunity for informal resolution and a hearing within sixty (60) days of filing a complaint.
- Allow appeals to the State when no decision is issued within sixty (60) days or when a party is dissatisfied with the local decision.
- Allow U.S. Secretary of Labor to investigate grievances and complaints when a state decision is not issued within 60 days; or a party receives an adverse state decision and appeals to the Secretary.
- Maintain complaint records and publicize complaint rights.

Scope and Audience

This policy is designed to ensure individuals, program participants and other interested parties that are affected by the local workforce development system can file grievances or complaints alleging violations of the requirements of WIOA Title I.

Who May File a Program Complaint or Grievance

Complaints or grievances may originate from WIOA Title I-funded facilities, programs, services and activities administered by or operated by the LWDB, PA CareerLink® Operator, and other LWDA affiliated entities including the following:

- PA CareerLink® program partners
- WIOA Title I program service providers and contractors
- Eligible Training Providers and other entities providing training services
- Affiliated entities which provide services, activities and supportive services within a LWDA's workforce delivery system

Note- the Job Corps program is excluded from these provisions and have their own regulatory requirements

The following individuals or entities may file a complaint or grievance alleging violations of the requirements of Title I of WIOA:

- Individuals; Program Applicants and Participants; Former Participants
- Employees
- Employers
- Service Providers
- Contractors
- Training Providers
- Labor Organizations
- Community Based Organizations
- Other Interested Parties

Reasons a Program Complaint can be Filed

A program complaint involves an issue with how program services are delivered. Complaints regarding the Equal Opportunity Policy should be submitted in accordance with Advance Central PA EO/Civil Right Discrimination Policy and Procedure. Complaints alleging discrimination or retaliation based on protected status must immediately be referred to the Equal Opportunity (EO) Officer.

Program Complaint Types

Examples of complaints covered under these procedures include:

- Denial of program access
- Eligibility disputes
- Improper termination from services
- Failure to provide required services
- Violations of WIOA Title I requirements
- Procurement disputes
- Misuse of WIOA funds
- Service delivery concerns
- Violations of local policy

Methods of Filing A Program Complaint/Grievance

Complaints may be filed:

1. In person
2. By mail
3. By email
4. Electronically
5. By telephone with staff assistance

Staff shall assist individuals who require help reducing complaints to writing. This includes listening to concerns and providing the **WIOA Title I Compliant/Grievance Form** which is attached to this policy in a format accessible to the individual. Reasonable accommodation and language assistance services must be provided when necessary. If staff complete the Form for an individual, they are required to read it back to the complainant to confirm that it correctly communicates what they intended.

In all cases, the form must be signed by the complainant indicating their attestation that the information provided is accurate. In cases where staff assist the complainant in filling out the form, it may be emailed for application of the signature or mailed with a self-addressed stamped envelope for return.

Content of the Program Compliant/Grievance

Complaints must include the following:

- Name and contact information of complainant
- Name of respondent, if known
- Description of allegations
- Relevant dates
- Supporting documentation, if available
- Requested resolution

Complainants are encouraged to use the attached **WIOA Title I Compliant/Grievance Form** which provides sections for each of the required content areas.

Time Limit for Filing

Complaints must generally be filed within one (1) year of the alleged violation unless another law or regulation establishes a different filing period.

Complaint Coordinator

Advance Central PA designates the following individual to coordinate WIOA Title I complaints and grievances. Complainants must submit their complaint to this individual.

Marca O'Hargan, Compliance Monitor/EO Officer
Advance Central PA
130 Kelly Square, Suite 1
Lewisburg, PA 17837
570-568-6868
mohargan@advancecentralpa.org

Complaint/Grievance Filing Process Overview

1. Complainant Submittal of the Complaint

Complainant must submit their complaint/grievance to the Complaint Coordinator.

2. Informal Resolution

Within 10 working days of receiving the complaint, the Complaint Coordinator will review the complaint and may attempt informal resolution prior to a formal hearing. Informal resolution methods may include:

- Staff conferences
- Mediation
- Corrective actions
- Settlement discussions

If the complainant cannot be reached or fails to respond, the Complaint Coordinator will proceed with processing the complaint based on the complaint that was submitted, internal records such as the PA CareerLink® system of record, CWDS, as applicable, and information gathered from any available parties.

If an informal resolution cannot be reached with the Complainant or if the Complainant was unable to be reached within 10 business days as outlined above, the Complaint Coordinator will forward the complaint and evidence gathered to Advance Central PA's Policy & Performance Committee. The Policy & Performance Committee will meet within 15 days to review the complaint and associated materials. This Committee will issue its decision to the complainant within 2 working days of such meeting.

Note: Informal resolution efforts shall not delay the complainant's right to a hearing.

3. Right to a Hearing

If a complaint cannot be resolved informally, the complainant shall be provided an opportunity for a hearing. Therefore, if complainant is not satisfied with the decision of the Policy and Performance Committee, the complainant may submit a request for a hearing along with the reason for dissatisfaction with the decision of the Committee within 5 days.

4. Hearing Processes

Advance Central PA shall conduct a hearing when requested and issue a written decision within sixty (60) days of the filing of the complaint.

Hearings shall:

- Be conducted by impartial hearing officer(s), including a designated Workforce Development Board member
- Provide reasonable advance notice
- Allow both parties to present evidence
- Allow witness testimony
- Permit representative by counsel or another representative
- Maintain an official record of proceedings
- Result in written decision

5. Written Decision

Written determinations shall include:

- Summary of allegations
- Findings of fact
- Applicable laws or regulations
- Conclusions
- Corrective actions, if applicable
- Appeal rights and deadlines

Appeals Process

A request for a local level appeal (20 CFR 683.600(c)(4)) to the PA Department of Labor & Industry (L&I) can be made by either a complainant or a respondent not satisfied with the local area's hearing decision or when no local area decision was reached within 60 of the filing of the grievance or complaint.

Complainants are encouraged to use the attached **WIOA Title I Compliant/Grievance Appeal Form** which provides sections for each of the required content areas.

State hearings or appeals will be conducted in accordance with the Memorandum of Understanding for Independent Hearing Examiner Services between the L&I and the PA Department of State as well as regulatory provisions found at Title 20 CFR 683.600-620.

The designated Agency Liaison for the State Workforce Agency shall be L&I's Bureau of Workforce Partnership Customer Service Coordination Unit Supervisor. The Agency Liaison is responsible for coordinating activities with the appointed hearing examiner.

Grievances or complaints under 20 CFR 683.600, submitted directly to the US Department of Labor (USDOL), will be referred to the appropriate state or local area for resolution, unless USDOL notifies the parties involved that US DOL will investigate the submitted complaint or grievance.

Pursuant to 20 CFR 683.610(a) US DOL will investigate allegations arising through the grievance procedures found in 20 CFR 683.600 when:

1. A decision on a grievance or complaint under 20 CFR 683.600(d) [*i.e., State Procedures*] has not been reached within 60 days of receipt of the grievance or complaint or within 60 days of receipt of the request for appeal of a local level grievance and either party appeals to USDOL. Appeals made under either of these scenarios must be filed within 120 days of the filing of the grievance with the state, or the filing of the appeal of a local grievance with the state.
2. A decision on a grievance or complaint under § 683.600(d) [*i.e., State Procedures*] has been reached and the party to which such decision is adverse appeals to USDOL. Appeals made under this scenario must be filed within 60 days of the receipt of the decision being appealed.

Under the scenarios listed above USDOL must make a final decision on the filed appeal no later than 120 days after receiving the appeal. All appeals must be submitted by certified mail, return receipt requested, to:

Secretary
U.S. Department of Labor
200 Constitution Ave. NW
Washington, DC 20210
Attention: ASET

Confidentiality

Complaint information shall be maintained confidentially to the maximum extent permitted by law.

Retaliation Prohibited

No person may intimidate, threaten, coerce, discriminate against, or retaliate against any individual because they:

- Filed a complaint
- Participated in a complaint investigation
- Assisted in complaint processing
- Opposed unlawful practices

Complaint/Grievance Tracking and Record Retention

Tracking Procedures

All complaint records will be tracked by Advance Central PA using the WIOA Title I **Program Complaint Tracker** spreadsheet. The tracker includes complainant contact information and all relevant dates regarding complaint informal review, hearing, and appeal.

Record Retention

All complaint records shall be maintained for a minimum of three (3) years following final resolution unless a longer retention period is otherwise required by law.

Records shall include:

- Complaint forms
- Correspondence
- Investigation materials
- Hearing records
- Determinations
- Appeals
- Resolution documentation

Public Notice

Advance Central PA will:

- Publicly post complaint procedures

- Include complaint rights in participant materials
- Make procedures available upon request
- Ensure staff are trained regarding complaint procedures and rights

Fraud and Waste

Pursuant to 20 CFR 683.620, allegations of fraud, abuse, criminal misconduct, and misuse of WIOA funds may be referred to appropriate investigative authorities and handled separately from standard grievance procedures.

Attachment: WIOA Title I Compliant/Grievance Form

Complainant (person filing the complaint) Information	
Name	
Address	
Phone Number	
Email Address	
Participant ID (if applicable)	
Complaint Submittal	
Date Complaint Submitted	
Method of Filing the Complaint	☐ In person ☐ Electronically ☐ By mail ☐ By telephone with staff assistance ☐ By email
Submitted to	Advance Central PA EO Officer
Description of Allegations	
Date(s) of Allegations	
Location of Allegations	
Name of Involved Person(s), WIOA Title I Program(s), Etc.	

Description of Allegations (Clearly describe your complaint and any relevant information about what happened.)	
Supporting Documentation (Clearly outline any supporting documentation you are including with this form.)	

Description of Requested Resolution	
Requested Resolution (Clearly describe what you would like to happen to resolve the complaint.)	
Attestation	
By signing, I attest that the information documented on this form is true and accurate.	
_____ Signature	_____ Date

Attachment: WIOA Title I Compliant/Grievance Appeal Form

Complainant (person filing the complaint) Information	
Name	
Address	
Phone Number	
Email Address	
Participant ID (if applicable)	
Original Complaint Submittal	
Date Initial Complaint Submitted	
Date of Written Decision	
Appeal Submittal	
Date Appeal Submitted	
Method of Submittal	☐ In person ☐ Electronically ☐ By mail ☐ By telephone with staff assistance ☐ By email
Submitted to	
Description of Appeal	
Description of Reason for Appeal	

Supporting Documentation (Clearly outline any supporting documentation you are including with this form.)	
Description of Requested Resolution	
Requested Resolution (Clearly describe what you would like to happen to resolve the complaint.)	
Attestation	
By signing, I attest that the information documented on this form is true and accurate. _____ Signature _____ Date	

Review Log

Including annual reviews since the latest published revision.

Date of Review	Annual Review
June 2024	Annual review completed. No revisions were required.
June 2025	Annual review completed. No revisions were required.
July 2026	Revisions applied per June 18, 2026 notice of the new Local Workforce Development Board (LWDB) Title I Grievance Process Requirements from L&I.



PA CareerLink[®] Code of Conduct Policy

Implemented July 2026

Developed by:
Central Pennsylvania Workforce Development Corporation, dba Advance Central PA

Advance Central PA is an equal opportunity employer/program. Auxiliary aids and services available upon request to individuals with disabilities. Program funded with federal dollars. For more information, visit: <https://advancecentralpa.org/about-us/public-notices/>

PA CareerLink® Code of Conduct Policy

Background

This policy is established to maintain a safe, welcoming, respectful, and professional environment for everyone at the PA CareerLink®, and applies to anyone who utilizes the PA CareerLink® including: job seekers and other individual customers, accompanying children/dependents, and visiting businesses and community organizations.

General Conduct and Professionalism

The PA CareerLink® is a place of business where customers might be writing resumes, searching for jobs, participating in job coaching sessions with staff, interviewing with employers, or taking classes. To maintain a professional environment where everyone can effectively access the services they would like, standard expectations must be upheld by everyone on site.

- Treat others with respect, courtesy, and dignity.
- Do not initiate or engage in verbal abuse, swearing, intimidation, harassment, physical aggression, or disruptive behavior; these behaviors are unacceptable and will not be tolerated.

PA CareerLink® Computers and Equipment

Computers, phones, printers, and specialized equipment are available for appropriate and safe use. This includes usage related to: PA CareerLink® online account access and services, career exploration, skills training, job search, health and benefits monitoring, access to public and other community resources.

Supervision of Accompanying Children

Customers are responsible for the supervision and behavior of any children present with them at PA CareerLink®. Children may not use the PA CareerLink® computers, phones, printers, or other office equipment. PA CareerLink® staff are not permitted to watch children or otherwise be responsible for them.

Guidelines:

- Customers may not leave children unattended at any time.
- Customers must ensure children remain in designated areas of the site unless otherwise directed.
- Customers must be able to fully participate in planned activities and services.

Customers are responsible for ensuring that children:

- Use indoor voices.
- Do not engage in disruptive, unsafe, or inappropriate behavior.
- Do not run or engage in rough-housing.

- Respect staff, customers, equipment, and facility rules.
- Follow all posted signs and staff instructions.
- Do not interfere with program services or other participants.

Examples of disruptive behavior include (but is not limited to):

- Excessive noise, running, or unsafe activity.
- Interference with workshops, appointments, or computer use.
- Damage to property or equipment.
- Behavior that creates discomfort or safety concerns for others.

Customers who bring children on-site may provide entertainment as follows:

- Books are strongly encouraged. Remember, the library is a great resource! If you don't currently have a library card, PA CareerLink® staff will be happy to help you understand what to do.
- Coloring books and crayons and imaginative toys such as blocks, dolls, and figurines can be brought on-site for quiet play.
- Children are permitted to watch videos or play games on a phone or other device that the customer brings, but headphones must be used so they do not disturb other customers.
- The site may also have quiet toys and books for children. If interested, ask staff if there are toys or books available.

Workstations with infant mats:

- Some PA CareerLink® sites have workstations that allow customers to use a computer to access training activities while an infant or small toddler can rest or play quietly next to them. If interested, ask staff if there is workstation like this available.

Food and Drink

Customers may bring small non-messy snacks and drinks with secure lids.

Customers are responsible for cleaning up any wrappers, crumbs, spills, etc. and must ask for help if cleaning supplies are needed.

Alcohol, Smoking, and Other Drugs

The manufacturing, distribution, selling, possession, or use of alcohol or illegal drugs is prohibited while you are at the PA CareerLink® or engaging in remote activities, such as workshops. If you are having a problem with alcohol or drugs, speak with staff who may be able to help connect you to available resources in the community.

Smoking and vaping are prohibited while on the premises.

Weapons

The possession of a weapon of any kind is prohibited. Visitors with weapons will be required to immediately leave.

Note: This does not apply to visitors who carry weapons as part of their official capacity, such as the PA State Police.

Service Animals

Service animals are permitted on-site. In accordance with the Americans with Disabilities Act (ADA), service animals are: dogs of any breed or size trained to perform a task directly related to a person's disability.

Other animals are not permitted. For example, emotional support animals are not permitted to enter.

Per the ADA, staff may ask an individual with an animal:

- Is the dog a service animal required because of a disability?
- What work or task has the dog been trained to perform?

Staff Authority and Immediate Actions

If this policy is not being followed, PA CareerLink® staff have the authority to professionally address the part of the policy that is not being adhered to with the individual. If the non-compliance with this policy is not immediately resolved, staff may take the following actions:

- Pause, end, or reschedule an individual's appointment/activity
- Request that the individual step outside or leave the premises
- Schedule an appointment to discuss or re-evaluate barriers and remediation plans
- Contact law enforcement

Consequences/Impact on Participation

Individuals enrolled in specific PA CareerLink® programs may have additional expectations and those policies and/or handbooks should be consulted for more information. Overall, failure to meet the expectations outlined herein may result in:

- Loss of participation hours for that day
- Rescheduled or missed activities
- Termination of access to the PA CareerLink® in Central PA

Review Log

Including annual reviews since the latest published revision.

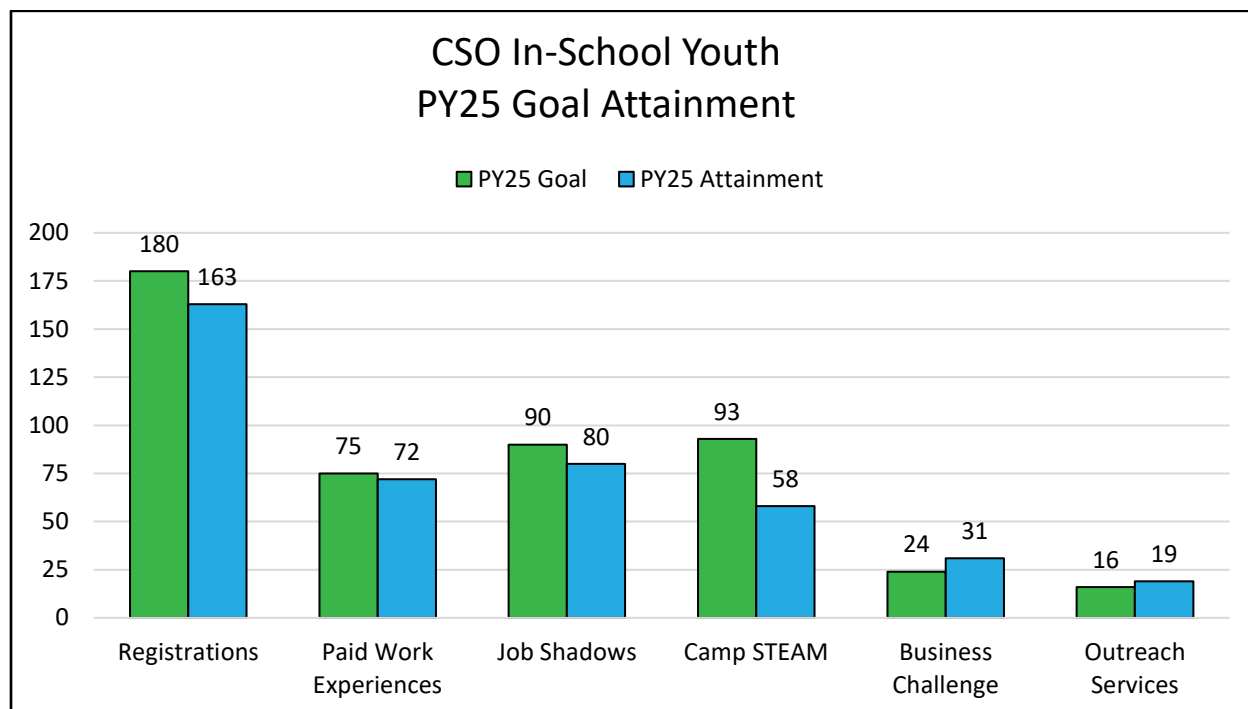
Date of Review	Annual Review
7/2026	Implementation Date

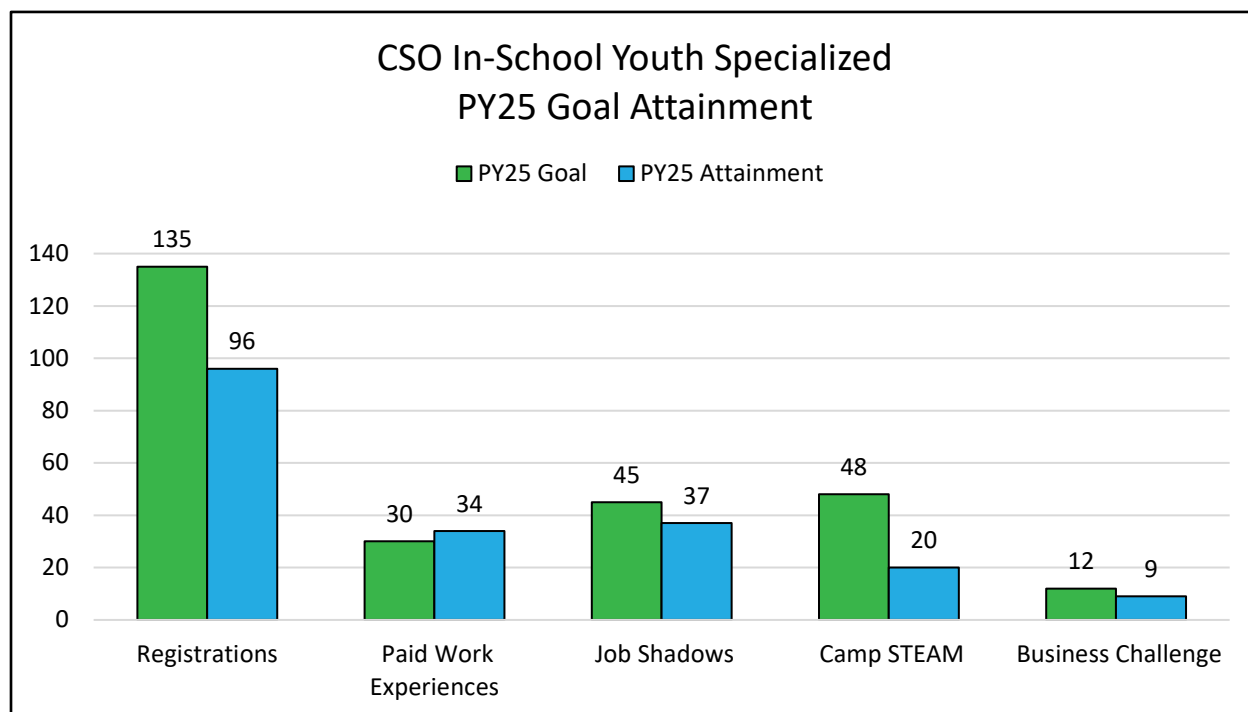
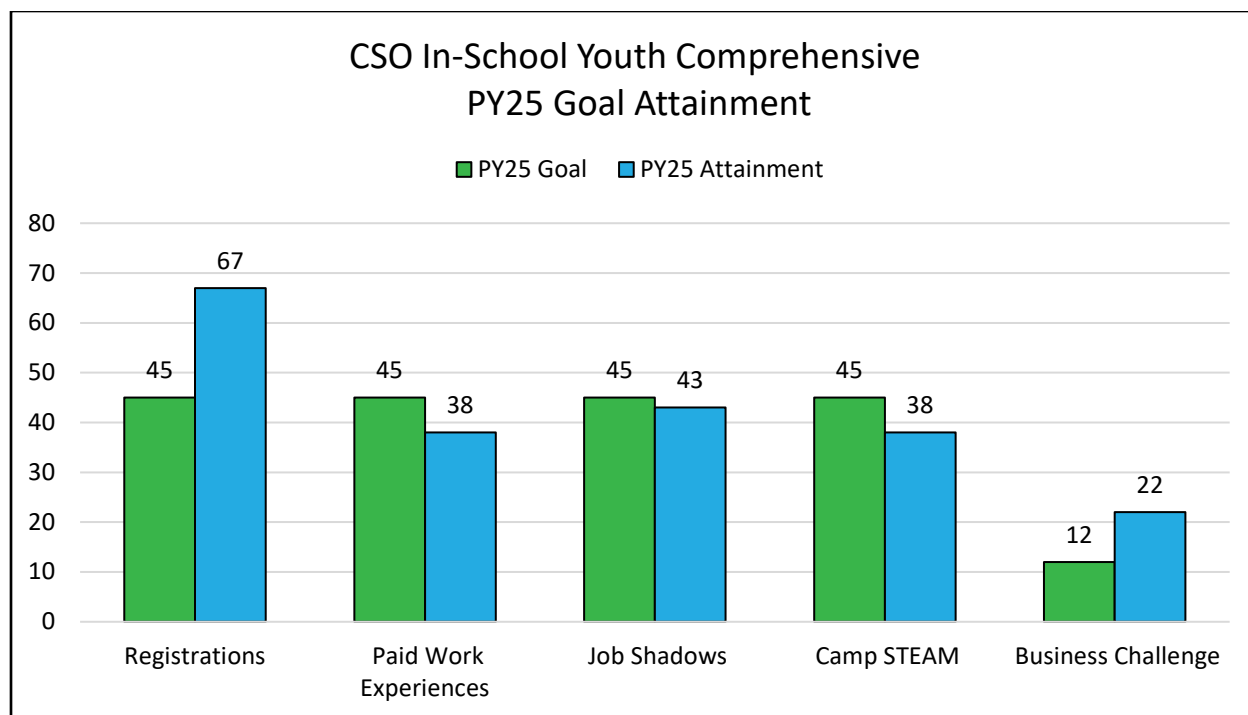
Bridges to the Future In-School Youth Program Goal Attainment

PY25: July 1, 2025- June 30, 2026

Program Provider: CSO

Program Element	Program Year Goal	Program Year Attainment	% of goal reached
Comprehensive Registrations	45	67	149%
Comprehensive Paid Work Experiences	45	38	84%
Comprehensive Job Shadows	45	43	96%
Comprehensive Camp STEAM	45	38	84%
Comprehensive Business Challenge	12	22	183%
Specialized Registrations	135	96	71%
Specialized Paid Work Experiences	30	34	113%
Specialized Job Shadows	45	37	82%
Specialized Camp STEAM	48	20	42%
Specialized Business Challenge	12	9	75%
School Districts Receiving Outreach Services (BEP Grant)	16	19	119%





YES to the Future Out-of-School Youth Program Goal Attainment

PY25: July 1, 2025- June 30, 2026

Program Provider: CSIU

Program Element	Program Year Goal	Program Year Attainment	% of goal reached
Registrations	200	202	101%
Paid Pre-Work Experience	60	39	65%
Job Shadows	30	45	150%
Paid Internships	60	32	53%
On-the-Job Training	12	10	83%

