



*Building partnerships to create workforce opportunities that cultivate business,  
grow jobs, develop people, and build community.*

**Board of Directors and Elected Officials Consortium Meeting  
Executive Committee Meeting**

**Thursday, July 31, 2025, 10:00 a.m. – 12:00 p.m.**

**Harrisonburg City Hall, 409 South Main Street, Harrisonburg, VA – Rooms 11 and 12**

**Call to Order (10:00 – 10:05)**

- Roll Call (Board and Consortium)
- Quorum Status (Board and Consortium)
- Chair Opening Remarks

Randy Doyle  
Sharon Johnson  
Randy Doyle

**Consent Agenda (10:05 – 10:10) (Board Vote)**

- Board, Consortium and Executive Committee Minutes March 27, 2025
- One Stop Operator Report
- Programs Report
- Business Services Report
- Network2Work Report
- Grievance and Discrimination Complaint Policy Revisions
- Individual Training Account Policy Revision

Randy Doyle

**Financial Update (10:10 – 10:30)**

- Program Funding Status
- Request to Transfer Funds from DW to Adult **(Board Vote)**
- Current Budget Transitioning into PY 2025 **(Board Vote)**
- Financial Report Year End June 30, 2024 **(Board Vote)**
- Finance Committee Report

Randy Doyle  
Sharon Johnson  
Stephanie Branner  
Jo Lee Loveland Link

**Workforce Initiatives and Strategic Discussion (10:30 – 11:45)**

- Strategic Scenario Planning
- Talent Pathways Initiative Final Report Presentation
- Workforce System Changes and SVWDB Positioning

Randy Doyle  
Sharon Johnson  
Mason Bishop

**Other Business and Public Input (11:45 – 12:00)**

- Meeting Dates 2025 - 2026
- Announcement

Randy Doyle  
Sharon Johnson

**Adjournment (12:00)**

Randy Doyle

**Next Meeting November 20, 2025  
Harrisonburg City Hall Rooms 11 and 12**

## **Public Input Rules and Guidelines**

- 1) Citizens desiring to speak during the public input period must sign in on the Public Input Sign-in sheet to provide information which includes printed name, organization (if applicable) and input topic. This will allow for citizens to be recognized by the Chairman of the Board or Consortium during the Public Input period.
- 2) Individuals should stand when recognized by the Chairman of the Board or Consortium; speak their name, organization (if applicable) and input topic.
- 3) Individuals should direct input to the Chairman of the Board or Consortium.
- 4) Individuals are limited to no more than three (3) minutes. The time limit applies per individual and not per topic. Individual input to address multiple topics is limited to five minutes.
- 5) Individuals representing a group of citizens are limited to five (5) minutes; members comprising the group represented forfeit their individual time to speak.
- 6) When there are multiple individuals requesting time for public input on a single topic and the input is the same, at the Chairman of the Board or Consortium's discretion, the number of speakers may be limited in order to make effective use of Board or Consortium member's time and to allow an opportunity for input on multiple topics to be heard by the Board or Consortium.
- 7) All citizens are strongly encouraged to put their comments in writing to the Board or Consortium prior to the meeting for inclusion in the meeting materials. Such written comments should be submitted to the SVWDB office the Monday prior to the Board or Consortium meeting.

**Virginia Career Works – Shenandoah Valley Region is an Equal Opportunity/Program  
Auxiliary aids and services are available upon request to individuals with disabilities**

**TDD: VA Relay Center: 711 or 800.828.1120**

*a proud partner of the American Job Center Network*

This workforce product was created using 100% of federal U. S. Department of Labor Employment and Training Administration Workforce Innovation and Opportunity Act (WIOA) award made to Page County on behalf of the Shenandoah Valley Workforce Development Area by the pass-through entity, the Virginia Community College System.



*Building partnerships to create workforce opportunities that cultivate business, grow jobs, develop people, and build community.*

**Board of Directors and Elected Officials Consortium Meeting Minutes  
Executive Committee Meeting Minutes  
Thursday, March 27, 2025, 10:00 a.m. – 12:00 p.m. and 12:15 – 2:00 p.m.  
Harrisonburg City Hall, 409 South Main Street, Harrisonburg, VA – Rooms 11 and 12**

**Welcome and Call to Order:** Chair Randy Doyle welcomed members and called the meeting to order at 10:00AM. There was not a quorum of private sector Board members and therefore, not a quorum of the Board. There was not a quorum of the Consortium. However, there was a quorum of the Executive Committee.

**Staff Present:** Sharon Johnson, Tristan Walters, Stephanie Branner, Kaystyle Madden

**Guests Present:** Mason Bishop

**Consent Agenda:** Sharon Johnson and Randy Doyle presented the Consent Agenda and opened the items up for discussion. The items included the November 21, 2024 Meeting Minutes, the One Stop Operator Report, Business Services Report and the Performance Metrics Report. Each item was reviewed briefly and there was no additional discussion.

Since we did not have a quorum of the Board or Consortium, but did have a quorum of the Executive Committee, members of the Executive Committee (EC) voted to proceed with the vote during the Board meeting. This ensured that any Board or Consortium member present could offer discussion of concerns or additional input. EC member Jay Langston made the motion to allow EC members to vote during the Board meeting. Liz Savage provided the second. There was no further discussion, and the motion passed unanimously.

For the consent agenda vote EC member Jay Langston made the motion to accept the Consent Agenda as presented, and EC member John Downey provided the second. There was no further discussion, and the motion passed unanimously with both EC and Board/Consortium Member input.

**WIOA Operational Business:** Sharon Johnson presented several WIOA Program Policies for review and approval to the Board, including the Individual Training Account Policy, Youth Incentive Policy, and Work Based Training policy (formerly the On-the-Job Training Policy). The differences were outlined and sent out prior to the meeting for review by Board members, and there was no additional discussion. EC member John Downey made the motion to accept the policies as presented, and EC member Katy Parrish provided the second. The motion passed

unanimously with both Board and Consortium Member input.

Tristan Walters presented the draft Local Plan to the Board Members. The final plan needed to be approved for release for public comment. The public comment period would begin the day after the Board Meeting, and request for input would be solicited through email, social media and partner outreach. There were no questions regarding the plan, and EC member Jay Langston made the motion to approve the plan pending completion of the public comment period, and the resolution of any comments received. EC member Liz Savage provided the second, and the motion passed unanimously with both Board and Consortium member input.

Jo Lee Loveland Link, Finance Committee Co-Chair, presented the minutes from the March Finance Committee Meeting. After updating the Board on the committee's discussion, Finance Director Stephanie Branner presented the program year 2024 (PY 2024) budget for review and approval. After some discussion for clarification, EC member Liz Savage made the motion to approve the budget as presented. EC member Liz Fuchs provided the second. The motion passed unanimously with both Board and Consortium input.

Chris Hurley provided an update on the status of the Workforce Centers in the Valley. Fishersville continues to be open and serves walk-in clients. Winchester has settled into their new location and is finalizing staff placement to improve customer flow. Unfortunately, the Harrisonburg Virginia Career Works location continues to remain in flux. The SVWDB is still collocated with Skyline Literacy at the Wharton, Aldhizer & Weaver (WAW) building, located at 100 S. Mason Street in Harrisonburg. Chris is continuing to pursue space at the Harrisonburg Innovation Hub but has hit several roadblocks within Virginia Works. He will continue to keep the SVWDB apprised of the situation. His staff members continue to serve Harrisonburg job seekers virtually.

**Workforce Initiatives Strategic Discussion:** Tristan Walters presented the status of Network2Work (N2W) in the Valley to the Board. The N2W team is working hard to meet their enrollment goal of 158 participants over the course of the program year, which will end 6/30/2025. In preparation for the new year, the N2W team is reviewing outreach possibilities, partnership opportunities, service delivery strategies, budget development and long-term sustainability measures. More information will be relayed at the upcoming Board Meeting.

Sharon Johnson shared additional information about several other projects the SVWDB is involved in, ARC Funding and Partnership, Cargill & The Centre for Child Rights & Business Youth Initiative, Paraprofessional to Teacher Training Program, and the Shenandoah Valley Health Sciences Workforce Partnership. Each of these partnerships has potential for a small amount of funding to serve job seekers across the Valley. The SVWDB was recently approached by the Centre for Child Rights and Cargill to act as the regional convenor for a project serving youth who need income to help support their family while also completing their secondary education.

The goal would be to place these youth in safe, appropriate roles with companies that would allow for continued growth and education. The SVWDB was awarded funding to work with them on the project and the contract is pending signature. The Paraprofessional to Teacher Training Program is a potential partnership with Frederick County Schools to help develop a pipeline for educators to help fill the gap the education sector is currently facing. This discussion is in the preliminary stages and requires the SVWDB to establish an Incumbent Worker Training program. The Shenandoah Valley Health Sciences Workforce Partnership continues to meet and discuss potential services in the area. Unfortunately, the team has encountered a roadblock with funding to support a Health Care Sector Partner Coordinator, with most supporters already expending their discretionary grant funds this year. Work by the existing team members moves forward at a slow pace without dedicated resources.

Mason Bishop shared the current progress on the Talent Pathways Initiative and opened the results up for discussion among the Board members. The hope is to finalize the information in the TPI Report and roll that information out at the next Board Meeting. Sharon Johnson shared that the upcoming Board meeting date may change to align with the report, or a separate meeting date will be scheduled. Members agreed that they would like to attend a meeting solely focused on the TPI report roll out.

**Adjournment:** The meeting was adjourned at 12:00PM and there was no request for public input.

Respectfully submitted,  
Tristan Walters

**Virginia Career Works – Shenandoah Valley Region is an Equal Opportunity/Program  
Auxiliary aids and services are available upon request to individuals with disabilities**

**TDD: VA Relay Center: 711 or 800.828.1120**

*a proud partner of the American Job Center Network*

This workforce product was created using 100% of federal U. S. Department of Labor Employment and Training Administration Workforce Innovation and Opportunity Act (WIOA) award made to Page County on behalf of the Shenandoah Valley Workforce Development Area by the pass-through entity, the Virginia Community College System.

---

**ONE STOP SYSTEM OPERATOR (OSSO) REPORT**  
**To the Shenandoah Valley Workforce Development Board**  
**March through June 2025**  
**For the WDB Meeting on July 31, 2025**

**I. SYSTEM PROCESS IMPROVEMENTS**

**1. Customer Satisfaction Comment Card System**

- A summary of the *2nd Quarter 2025, April 7, 2025 – July 6, 2025* satisfaction data is below.
  
- **Jobseeker Total Responses: 19 compared to 16 in the last report.**
  - Responses were from Harrisonburg (0), Fishersville (2), and Winchester (14). Some respondents identified the agency they came for as well: Virginia Employment Commission (1), Adult Education (1) and WIOA Youth (1).
  - Most services reported receiving:
    - Assistance with job search 11
    - Assistance with Unemployment Insurance (UI) 9
    - Assistance with building a resume 4
  - All respondents agreed or strongly agreed that they were satisfied with their overall experience.
  - Word of mouth and referral from another agency were most often cited this quarter in response to *'how did you find out about the site and the services?'*
  - Staff continue to be recognized for good customer service (specifically Nelson and Wanda from Virginia Works and Chris and Kaystyle).
  
- **Employer Total Responses: There were 7 responses compared to (12) responses in the last quarter.**
  - Job Fairs were the most often cited service received, reported by 6 respondents.
  - 3 respondents also reported posting open positions.
  - 6 respondents agreed or strongly agreed that they found the right candidates.
  - 6 respondents agreed or strongly agreed that they were satisfied with their overall experience.
  - 2 respondents identified themselves as small businesses with 20 employees or less; 1 identified as a medium size business with 99 employees or less, and 3 identified themselves as large businesses with over 250 employees.
  - Comments included:
    - *Keep Christopher Hurley and Kaystyle Madden! They are terrific people, outstanding resources, and excellent business partners.*
    - *We appreciate you letting us join at the last minute and look forward to joining future events in the area. I liked how the flow went. I would only ask if you can provide names and contact information of attendees for follow-ups. This being our first event we weren't real sure how that process looked and we were very interested in several candidates who stated they would follow-up with us.*

## 2. Standardizing Data Collection.

A virtual service delivery tracker was launched in April 2023. Partners voluntarily enter their data electronically monthly. DARS does not identify virtual delivery as a separate process. They provide a separate report. The purpose is to collect data about services delivered to customers virtually as opposed to face to face. The Partnership believes that this, in combination with the foot traffic report, provides a better picture of our collective level of effort. Data for the 3-month period is below.

## II. OPERATIONS

### 1. Status of Centers

- **Fishersville:** The center is open and provides services by appointment and walk-ins.
- **Harrisonburg:** VA Works successfully moved into their new office (#215) at the **Harrisonburg Innovation Hub** (25 N Liberty St., Harrisonburg, VA 22802) on **Tuesday, June 24, 2025.**
- **Winchester:** The center moved to 609 Cedar Creek Grade. WIOA Title I staff and the older worker program staff have space at the location.
- The Center Management Teams (CMTs), made up of collocated partners, continue to meet monthly.
- Continue to provide support and problem-solving strategies to the Centers Manager and the Virginia Works Managers in Fishersville and Winchester.

### 3. Facilitating monthly meetings of the MOU Partners,

- At the beginning of each program year the partners develop a set of goals that align to and support the WDB's strategic goals. As the new program year starts, we have not yet set new goals due to the uncertainty surrounding WIOA funding and reauthorization.
- Over the period there have been reports of company layoffs. The partners are briefed at these meetings and discussions ensue with ideas for strategies.
- The OSSO distributes information and a calendar of all job fairs and other events happening across the region monthly.

### 4. Data Report

#### Summary: Foot Traffic from March through June 2025

	Fishersville	Winchester	Harrisonburg <sup>1</sup>
Total Traffic	996	208	0
Total 1 <sup>st</sup> Time Visitors	488	158	0

<sup>1</sup> The Harrisonburg facility has been closed. However, staff meets with individuals at the library and other locations as well as virtually.

**Summary: Virtual Services Delivered<sup>2</sup>**

<b>Organization</b>	<b>March through June 2025</b>	<b>Off Site Appointments</b>	<b>March through June 2024</b>	<b>Off Site Appointments</b>
Adult Ed (Laurel Ridge)	920 (217 unduplicated)	3,152 (821 unduplicated)	904 (268 non duplicated)	4,702 (918 non duplicated)
Adult Ed (Region 6)	220 (48 unduplicated)	6,432 (1,562 unduplicated)	285 (69 unduplicated)	5,720 (1,104 unduplicated)
DBVI	400	212	358	144
DARS				
WIOA (Y/A/DW)	95		335	119
Virginia Works (Harrisonburg and Fishersville)	2,345	416	2,578	507
Virginia Works (Winchester)	1,436	226	4,340	
Telamon				

**DARS**

**Harrisonburg DARS:**

- May Applications YTD: 166
- June Applications YTD: 184 (increase of 18)
- May Plans YTD: 120
- June Plans YTD: 132 (increase of 12)
- May Successful Closures YTD: 51
- June Successful Closures YTD: 54 (increase of 3)

**Fishersville DARS:**

- May Applications YTD: 209
- June Applications YTD: 232 (increase of 23)
- May Plans YTD: 155
- June Plans YTD: 182 (increase of 27)
- May Successful Closures YTD: 47
- June Successful Closures YTD: 54 (increase of 7)

**Winchester DARS:**

- May Applications YTD: 180
- June Applications YTD: 205 (increase of 25)
- May Plans YTD: 135

<sup>2</sup> This data is not complete for all partners as all partners either do not report or do not report every month. The primary purpose of this data is to provide information on 'level of effort' rather than a count of the number of individuals seen, although some partners report both.

- June Plans YTD: 160 (increase of 25)
- May Successful Closures YTD: 58
- June Successful Closures YTD: 64 (increase of 6)

Full Data Reports available on request.



**End of Program Year Report  
November 13, 2024 to June 30, 2025  
Submitted by Lori Strumpf, Strumpf Associates  
and Interim WIOA Title I Program Director**

**SECTION I. EXECUTIVE SUMMARY**

***Overview of the program's goals.***

Strumpf began as the Interim Program Director on November 13, 2024. At that time, the WDB Director identified four goals she wanted accomplished to get the program back on track. These were:

- Increase program enrollments for youth, adults and dislocated workers.
- Develop new policies and procedures, if needed, and improve the consistency of how policies and procedures were implemented across the WIOA Title I program staff
- Develop and implement services that are needed.
- Provide support, training and technical assistance to staff.

***Highlights of significant outcomes and impacts.***

From November through the end of the program year, June 30, 2025:

- Enrolled forty-nine (49) individuals.
- Developed and implemented a comprehensive outreach plan, with a total of 40 events and 894 people engaged in learning about services between March and June 2025.
- Developed two guides to improve consistency of operations, an OJT and WEX guide.
- Revised SVWDB program related policies.
- Increased the number of individuals in workbased learning activities.
- Expanded our ability to provide Individualized Career Services including tutoring, digital literacy, use of Metrix Learning platform for career awareness, and use of VR headsets.
- Developed a partnership with Med-Certs and trained staff on opportunities for virtual training in healthcare occupations using the platform.
- Increased the use of support services, such as rental assistance, and stipends to ensure customers will be successful.
- Trained staff in the new approaches and services for customers.
- Provided training to clarify the specific codes used for different activities to enter into Virginia Workforce Connection.

**SECTION II. Program Performance**

***Enrollments***

Of the 49 participants enrolled since November 2024:

- 9 are out of school youth
- 39 are adults
- 1 is a dislocated worker.

As of June 30, 2025, there are 6 individuals that have been approved as initially eligible. We are waiting for them to submit all the required documents to move forward.



As of June 30, 2025, there were 8 individuals in the pipeline, e.g., they contacted us and are awaiting appointments to determine eligibility.

### ***Follow-up***

As of June 30<sup>th</sup>, there were 60 people in follow-up. Of the sixty (60), thirty-seven (37) are in Q4, and 20 of those have been verified as working. There was one individual when contacted in Q3 who asked not to be contacted again and who said they would block Amber if she did try to make contact.

## **SECTION III. PROGRESS ON GOALS**

### ***Goal 1: Increase program enrollments for youth, adults and dislocated workers***

My first objective was to set a target for the number of enrollments by June 30, 2025. The target was to enroll between 80 and 85 participants.

There were 47 individuals enrolled on November 13<sup>th</sup>. Eighteen of those were transferred from the career coach who went on maternity leave in September. Amanda had a total of 21 and Rickie had a total of 26. As of June 30, 2025, they each have an active caseload of approximately 40 each. Thus, we met the target of enrolling and maintaining 80 participants.

As stated above, as of June 30<sup>th</sup>, there is the potential to enroll another 12 to 14 individuals as we begin the new program year.

A consistent process was developed and implemented to assign new enrollees to a career coach and to exit those participants who have completed the goals in their IEPs.

### ***Goal 2: Develop new policies and procedures, if needed, and improve the consistency of how policies and procedures were implemented across the WIOA Title I program staff***

To ensure consistency in practice, we did several things:

- We identified the various versions of the same form being used and selected or revised one form for each specific purpose and discarded the others.
- I evaluated the practices for workbased learning and revised the policies and created a procedures manual for OJT and WBL.
- I wrote and distributed SOPS for various practices so that everyone had a written procedure to follow.
- Working with the Eligibility and Enrollment Specialist, we created a consistent method to review and approve an individual for eligibility, to track approvals of applications, to track enrollments and to provide support to her when she had eligibility questions.
- In collaboration with the finance department, we developed a new method to provide more comprehensive information than they previously had. This includes details on who is enrolled and the funding obligated to each individual. This process was designed to enhance transparency between the program and finance units, making it easier to manage and pay received invoices. We also implemented a process to more regularly de-obligate funds.

**Goal 3: Develop and implement services that are needed**

One of our key program design initiatives was to broaden the scope of individualized career services. Previously, most individuals we served were primarily engaged in training programs, often referred by training institutions. Beyond covering their tuition and some support services, they often required minimal career coaching. By expanding our range, we now engage a more diverse set of customers and better meet their unique needs. Below are the highlights of what has been created.

**1. Created four learning pathways in Metrix Learning.** These are designed for participants going into a WBL activity to be assigned to complete. These are pre-loaded modules to be completed in Metrix Learning for Workplace Essential Skills:

- **Digital Literacy:**
  - Writing Effective Emails and Instant Messages 52482
  - Keeping Your Skillset Current In the Digital Economy 55766
- **Communication:**
  - The Art and Science of Communication 52495
  - Using Active Listening in Workplace Situations 52964
- **Interviewing:**
  - Ultimate Interview Guide 64456
  - Top Interview Tips 64455
- **Essential Workplace Skills:**
  - Problem Solving: Determining and Building Your Strengths 17035
  - Earning and Offering Trust at Work 64830

**2. Expanded access to tutoring services.** It was determined that our adult education partner did not have enough capacity to respond to participants that might need tutoring. As Amber is formally a teacher, in her new role as Special Projects and Outreach Coordinator, she became the ‘in house’ tutor. To date, three individuals were referred by the coaches for tutoring and to date she worked with one participant to increase their skills. Amber has utilized the Metrix Learning platform to plan tutorial lessons. Also, through this effort, we are maximizing all the instructional capacity on the CASAS platform.

**3. Expanded the ability to conduct basic skills assessments.** All program staff were trained in how to administer CASAS virtually. Being able to conduct the assessment virtually provides more options and convenience for customers.

**4. Developed a Digital Literacy workshop.** In conjunction with Connected Nation, we will be delivering these workshops as both an individualized and basic career service in August. Amber will be trained in how to deliver each module. The plan is to deliver these in person workshops once a quarter.

**5. Improved OJT and WEX opportunities.**

Since November there have been 2 individuals in WEX and 9 in OJT. Five (5) of the OJTs were LPN student preceptorships. When I began in November, there was only 1 OJT. We continue to



reach out to employers to increase WBL opportunities. Coaches explain these opportunities to customers and promote them as a service when appropriate.

***Goal 4: Provide support, training and technical assistance to staff.***

Over the past eight months there has been daily communication with staff through text, email and phone to answer questions related to SVWDB policy, WIOA policy, eligibility determination, customer support and counseling issues, review of OJT and WEX processes and procedures, system corrections required, and related issues about how to support customers.

Additionally, I conducted three formal training sessions:

1. **Service Expansion and Manual Usage:** This session focused on the general expansion of our services and the specific use of the OJT and WEX manuals.
2. **State Monitoring Report Response:** In response to the state monitoring report, I conducted two sessions. The first was a general review of the types of mistakes identified in the report, aimed at helping coaches understand how to correct these errors and build their knowledge to prevent future occurrences.
3. **Virginia Participant Activity Codes:** Recently, I conducted a training session to review and discuss the Virginia Participant Activity codes. This was the second training session in response to the monitoring report.

**SECTION IV. Partnerships and Collaborations**

Through our outreach efforts we are strengthening our partnership with all the libraries in the region. We are also making a concentrated effort to build relationships with the faith-based community. A recent example is a meeting the outreach coordinator had with a large church in Harrisonburg that was not aware of the services offered.

**SECTION V. Challenges and Lessons Learned**

There have been several challenges and lessons learned during the past eight months.

***Challenges***

- **Transition:** The shift from the previous program director to my leadership has posed several challenges. Staff members are adapting to new methods, striving for consistency, and getting accustomed to my operational style. Additionally, I am learning how to best support each team member to ensure they perform at their highest level every day.
- **Communication:** Although the program staff has made efforts to improve our internal communication, interacting with the broader organization remains challenging. Decisions affecting program operations are sometimes made without my involvement in the decision-making process.
- **Reaching out in rural areas:** Amber and I have reached out to organizations in less accessible parts of the region, but responses have been sparse, making it difficult to expand our reach.
- **Center closing in Harrisonburg:** The closure of the Harrisonburg center has led to reduced access for our services in that area.
- **Mistakes:** Managing the extensive paperwork required in a WIOA program is challenging for the coaches, and ensuring accuracy in all cases can be difficult.

## *Lessons Learned*

### **Expanding Services:**

- **Strategic Outreach:** One key lesson is the importance of strategic outreach, especially in rural areas. Collaborating with local organizations and leveraging community networks can help to expand our reach.
- **Flexibility and Adaptation:** Adapting our services to meet the unique needs of different regions is crucial. This involves tailoring programs to address specific local challenges or opportunities.

### **Using More Digital Platforms:**

- **Enhanced Accessibility:** Digital platforms have significantly enhanced accessibility, allowing us to reach a broader audience, including those in remote areas. This is particularly effective for providing virtual workshops, training sessions, and coaching support.
- **Efficiency and Consistency:** Utilizing digital tools streamlines processes, ensuring more consistent communication and service delivery.

### **Increasing Case Loads:**

- **Effective Workload Management:** Increasing caseloads from approximately 20 to 40 requires effective workload management strategies. This includes prioritizing tasks, delegating responsibilities, and using technology to automate routine tasks.
- **Support and Training:** Providing career coaches with the necessary support and training is essential. Regular check-ins, professional development opportunities, and access to resources can help them manage the increased workload without feeling overwhelmed.
- **Positive Reinforcement:** Recognizing and rewarding the hard work of the career coaches by celebrating small wins and acknowledging their efforts has helped to make a difference in maintaining a positive work environment.

## **SECTION VI. FOCUS FOR THE COMING YEAR**

In the upcoming Program Year, our primary focus will be on stabilizing new business practices and maintaining our community outreach efforts to increase awareness of the workforce system and the services we offer. Additionally, we will concentrate on:

- **Setting Enrollment Targets:** Depending on the budget for the new Program Year, we will establish targets for enrollments in Youth, Adult, and Dislocated Worker programs, as well as targets for On-the-Job Training (OJT), Work Experience (WEX), and training programs.
- **Enhancing Social Media Use:** We aim to leverage social media platforms more effectively to engage with our community and promote our services.
- **Implementing 'Workforce Wednesdays' at the Harrisonburg Library:** Currently, Fishersville Center staff visit selected libraries, but services are not provided at the Harrisonburg library. Amber will visit the Harrisonburg library for a few hours one Wednesday each month to offer job search coaching. This outreach effort will also provide information on enrollment into WIOA Title I services and other available services. We will coordinate with Chris Hurley as the Harrisonburg office opens.



## **SECTION VII. ACKNOWLEDGEMENTS**

This has truly been a period of transition for the program staff. There were numerous changes in processes and procedures before I arrived, and many more have been implemented since. Change is never easy, and I want to take a moment to acknowledge the unwavering loyalty of the WIOA Title I team to both the organization and our customers. Their commitment to outstanding customer service has been remarkable.

I also want to acknowledge the invaluable support provided by our Quality Assurance Coordinator. Her assistance in processing financial documents and identifying areas for improvement in our files has been crucial. Without her help, the improvements we have achieved to date would not have been possible.

Together, we have made significant strides in improving the program, ensuring consistency, and fostering a collaborative team spirit. I am incredibly proud of how far we have come and am filled with optimism for the exciting year ahead.

## **SECTION XIII. APPENDICES**

- **Appendix A:** Sample Participant Feedback
- **Appendix B:** End of Year Summary: Outreach Efforts



## APPENDIX A

Each coach receives positive feedback from customers in the form of a text or verbal comments. One example from a customer of Amanda's, as an example, is below.

On June 25<sup>th</sup>, Amanda received the following from a customer who she helped coordinate a propane delivery:

*Amanda, thank you. I feel like I've been able to count on you and after this month things should be back to normal with everything and that's what I am really hoping for and I thank you for all your help during this process. They're going to ask when I can be home for the propane delivery and I can be there Monday or Tuesday or if they deliver over the weekend I can be there*

## APPENDIX B



**Shenandoah Valley Workforce Development Board  
Summary Report on Outreach Activities March 2025 through June 2025**

**July 2025**

Complied by Amber Hall, Special Projects and Outreach Coordinator,  
and Lori Strumpf, Program Director

**SUMMARY REPORT**



**On Outreach Activities  
March 2025 through June 2025**

**SUMMARY**

Below is a summary of our outreach activities since implementation of the 2025 Outreach Plan in March 2025.

<b>Location</b>	<b>Number of Events</b>	<b>Number of People Engaged</b>	<b>Types of Events</b>
<b>Augusta County</b>	15	218	Presentations Job Fairs Workshops
<b>Bath County</b>	0	0	
<b>Clarke County</b>	0	0	
<b>Frederick County</b>	8	207	Presentations Job Fairs
<b>Highland County</b>	0	0	
<b>Page County</b>	2	300	Workshops
<b>Rockbridge County</b>	2	11	Presentation Opening
<b>Rockingham County</b>	9	87	Presentations Job Fairs Workshops
<b>Shenandoah County</b>	2	42	Job Fairs
<b>Warren County</b>	2	29	Presentation Job Fair
<b>Total</b>	40	894	

## Outreach Activities by Month March 2025

Date	Event	Staff Lead	Individuals Engaged	Participants
3/12/2025	Waynesboro HS- VR Headsets	Natalie	50	Youth
3/13/2025	Laural Ridge- Resume Workshop	Amber	150	Youth
3/13/2025	Laural Ridge- VR Headsets	Natalie	150	Youth
3/14/2025	Sherando HS Job Fair	Amber/Amanda	40	Youth
3/17/2025	Blue Ridge CASA Presentation	Amber	8	Staff
3/18/2025	Buffalo Gap HS- VR Headsets	Natalie	50	Youth
3/18/2025	Project Horizon Presentation	Amber	6	Staff
3/19/2025	Family Promise	Amanda	5	Adult,DW,Youth
3/20/2025	Bowman Library VW Fair	Amanda	8	Adult,DW,Youth
3/20/2025	Harrisonburg Re-entry Fair	Amber	30	Adult,DW,Youth
3/20/2025	Stuarts Draft HS- VR Headsets	Natalie	Unknown*	Youth
3/25/2025	BRCC	Amber	20	Adult,DW,Youth
3/25/2025	Handley/Shen. Valley Career Showcase	Amanda	22	Youth
<b>Event Total</b>	13			
<b>People Reached</b>	539			

\*Sign in sheet was not able to be obtained

## April 2025

Date	Event	Staff Lead	Individuals Engaged	Participants
4/11/2025	Open Doors	Amber	1	Staff
4/10/2025	Rockingham Expo Event	Amber	40	Youth
4/16/2025	Triplett Tech	Amber/Amanda	12	Youth, Staff
4/17/2025	Handley Library VW Fair	Amanda	38	Adult,DW,Youth
<b>Event Total</b>	4			
<b>People Reached</b>	91			

\*Multiple events cancelled in April

## May 2025

Date	Event	Staff Lead	Individuals Engaged	Participants
5/1/2025	Samuel's Library VW	Amber	26	Adult,DW,Youth
5/9/2025	Massanutten Regional Library	Amber	1	Staff
5/13/2025	Augusta Re-entry council Meeting	Amber	25	Staff
5/14/2025	Talk with Skyline Digital Lit Classes	Amber	10	Adult,DW,Youth
5/15/2025	Shenandoah Expo	Amber/Amanda	30	Adult,DW,Youth
5/16/2025	Waynesboro DSS (Adult Services)	Amber	2	Staff
5/19/2025	Harrisonburg Parole	Amber	0	N/A
5/19/2025	Staunton Parole	Amber	4	Adult
5/20/2025	Adult Ed (Vici)	Amber	1	Staff

<b>5/22/2025</b>	Bowman Library VW	Amber	37	Adult,DW,Youth
<b>5/27/2025</b>	Blue Ridge Area Food Bank	Amber	1	Staff
	View Program	Amanda/Lori	3	Staff
<b>Event Total</b>	12			
<b>People Reached</b>	140			

## June 2025

Date	Event	Staff Lead	Individuals Engaged	Participants
<b>6/2/2025</b>	Adult Ed	Amber/Lori	1	Staff
<b>6/3-6/4/2025</b>	Skill Builders (week 1)	Amber	2	Adults
<b>6/5/2025</b>	Shenandoah Library VW	Amber	30	Adult,DW,Youth
<b>6/10-6/11/2025</b>	Skill Builders (week 2)	Amber	3	Adults
<b>6/10/2025</b>	Augusta Re-entry Council	Amber	25	Staff
<b>6/20/2025</b>	Mountain Gateway Opening	Amber	5	Staff
<b>6/23/2025</b>	Harrisonburg Parole	Amber	0	N/A
<b>6/23/2025</b>	Staunton Parole	Amber	4	Adults
<b>6/25/2025</b>	Augusta County Library VW	Amber	30	Adult,DW,Youth
<b>6/26/2025</b>	Handley Library VW	Amber	27	Adult,DW,Youth
<b>6/27/2025</b>	Mary Baldwin Uni.	Amber	1	Staff
<b>Event Total</b>	11			
<b>People Reached</b>	128			

\*Skill builders week 3 and 4 cancelled

## Participant Metrics

For this fiscal year, our participant metrics focused on the number of individuals with whom we had substantial interactions regarding our services. This metric goes beyond merely counting event attendees and reflects meaningful engagements.

Moving into the next fiscal year, the plan is to look at a better way to track more specific data about who is gathering information about SVWDB services. The plan is to gather more demographic information to better understand who is looking at our services and to be able to use that data to create more targeted outreach efforts when needed.

## Service Utilization

Moving forward, we would like to track more of the service utilization of those we have reached through our various types of outreach. This tracking would look at who enrolled in services because of these outreach efforts and potentially looking deeper at what services they utilized.

## Marketing and Communications

Our organization is currently not utilizing social media much at all. From March 1<sup>st</sup> to June 30<sup>th</sup> there were two posts on the Facebook page and one post on the Instagram page. This is something that could be utilized more moving into the next program year. We would like to see these posts include upcoming events, posts at events, and success stories from participants. This could be done at no cost to our organization using Canva and Microsoft Copilot.

## Challenges and Improvements Going Forward

- ***Obstacles encountered during outreach***
  1. Lack of follow-through. It is hard at times to get organizations to follow through with setting up a meeting/presentation.
  2. Lack of good contact information. It can be difficult to get contact information. Many times, websites are not up to date with staff information, or they have a generic online form to fill out and you never hear back.
  3. Lack of events in our most rural areas. As noted on the summary of outreach, there is a lack of events in Bath County, Clarke County, and Highland County.
  4. Timing. We started the outreach plan in March 2025. This is not the best time to start contacting schools. Starting earlier this next fiscal year will result in more outreach to high school seniors.
  5. Confusion over who we are. A lot of time is spent explaining that we are not Virginia Works or the Virginia Employment Commission. It seems that the branding of “Virginia Career Works” is confusing for some people. It can be

difficult to help potential participants understand that we are partners, but we are not the same.

- ***Lessons learned and recommendations for future outreach plans.***

1. Continue to follow up. A lot of the presentations that were given over this short time are due to continued follow-up with organizations if they showed any interest. It is recommended that we reach out again to those who we were not successful connecting with from the original plan.
2. Start reaching out to the high schools in the fall. This will hopefully help us engage in more senior events.
3. Build more relationships with libraries. Libraries are great community access points and can serve as a location for future workshops. This has started, and we are hoping to plan some ongoing, long term partnerships as we move into the new fiscal year.



# Shenandoah Valley Business Services April 2025 - June 2025

## By the Numbers

**Wagner Peyser Services** Job Matching, Posting, General Employer Support 378 Employers // 2,300 Services

**Rapid Response~** Waynesboro Nurseries

## Library Hiring Events

Augusta County Library  
Bowman Library  
Handley Library  
Samuels Library  
Shenandoah County Library  
Others:  
VPGCs Career Carnival  
Serioplast

## Business Solutions Team

Health Science Initiative  
Molson Coors Subcommittee  
Employers-Caf2Code; VPGC; UTS;  
Grafton Integrated Health Network  
**Network2Work**  
Employer Survey Completed  
Changes to Employer Network Criteria

**WE ARE  
HIRING**

## Upcoming Activities- Fall 2025

- Business Services Summit - September 2025

Upcoming Hiring Events for Fall 2025

55+ Hiring Event; Fall Expo, and other regional Fall events



**Our Employers Have Spoken**

**#1 Hard Skill - Microsoft Office**

**#1 Essential Skill - Communication**

Kaystyle Madden, M.Ed.  
Director of Business Services  
kmadden@vcwvalley.com  
(540) 433-4864 ext. 114



SHENANDOAH VALLEY REGION



## State of the Program

### Current State:

- Our focus will be on credentialing, training, and securing job opportunities that foster career advancement, rather than positions that confine individuals within the ALICE population (Asset Limited Income Constrained Employed).
- To better align with our refreshed focus on self-sustaining careers for our job seekers, we have made significant changes, drawing inspiration from the effective practices of N2W@PVCC, to uphold our grant, secure our budget, and assist our job seekers.
- N2W Team Members have attended 10+ outreach events this quarter.

### Progress

- 206 Participants Enrolled
  - Pending Participants: 52
- 95 Participants Job Ready
- 71 Participants Employed
  - 82% of employed participants indicate they are making over 30k/year.
- 36 Jobs posted
- 44 Employers
- 40 Active Providers
- 22 Pending Providers

### Success Stories

Network2Work in the Valley has assisted more than two hundred individuals in the past two years. Among these 200, 75% have found employment. We have successfully collaborated with numerous local providers to aid our job seekers in overcoming obstacles such as the risk of eviction, preventing utility disconnections, securing transportation, reinstating driver permits, and financing training for employment.

Job Seeker successes last quarter:

- CR came to us with his CDL- A in hand. He was directed to more than twenty open positions. He received help from Paula Woods in revising his resume. He required car repairs to attend interviews and work-related meetings. He applied for a position and is employed by Virginia Poultry Growers Cooperative, and he is eager to utilize his driving skills in a long-term career.
- Our partners at Harrisonburg-Rockingham CSB referred RH after her recent release from incarceration. During her time in prison, she acquired certification as a forklift operator. She was actively pursuing her pathway, accepted updates to her resume, practiced for interviews, and received car repairs and license reinstatement with the assistance of Network2Work. Despite facing minor setbacks, she has remained committed to maintaining her employment at Tenneco with the support of Network2Work.



## Shenandoah Valley Workforce Development Board

### BOARD DECISION BRIEF SVWDB Policy Updates

**Date:** July 31, 2025

**Reference:** WIOA Grievance and Discrimination Complaint Policy Revisions

**Background:** Virginia Works, the Commonwealth of Virginia's Workforce Development Agency, was monitored by the Department of Labor, Employment and Training Administration (DOLETA) on May 23, 2025. Following the review, DOLETA determined that all Local Workforce Development Board grievance and discrimination complaint policies needed revisions to align with federal compliance standards. To support this effort and ensure both the state and its subrecipients demonstrate full compliance, Virginia Works conducted a training session on Tuesday, July 8, 2025, to review the specific requirements for the relevant policies.

#### **SVWDB Policies Reviewed by Virginia Works:**

##### **LWDA 4 OP-12-05 Grievance and Complaints Policy**

**Revisions:**

**Key Changes:** At the bottom of page 2: Notice of Final Action, 3. 10 business days was revised to 30 calendar days.

**Minor Edits:** Grammatical, spelling, and formatting issues were corrected throughout the document for improved readability.

##### **LWDA 4 OP-12-03 Discrimination Complaint Procedures Policy**

No issues were found

**Revisions:**

**Minor Edits:** Grammatical, spelling, and formatting issues were corrected throughout the document for improved readability.

**Summary:** Virginia Works requested that any revised policies be submitted by July 31, 2025, so they can be included in Virginia Works' ETA remediation plan.

**Action Needed:** SVWDB approval of revised policies.

**Effective Date:** July 31, 2025

## Policy and Procedure

<b>Title:</b>	Grievances and Complaints, General	<b>Number:</b>	OP-12-05
<b>Effective Date:</b>	July 1, 2012	<b>Revisions:</b>	July 31, 2025

### Purpose

This policy outlines the procedures required under the Workforce Innovation and Opportunity Act (WIOA) to address grievances or complaints alleging a violation of WIOA requirements, or related agreements, policies, and procedures, by the Shenandoah Valley Workforce Development Board (SVWDB) or its service providers.

This policy does not address the procedures for processing complaints alleging discrimination under WIOA section 188 and/or 2 CFR, Chapter I, Chapter II, Part 200. Such complaints must be handled in accordance with the procedures set forth in that regulatory part. Questions about or complaints alleging a violation of the nondiscrimination provisions of WIOA section 188 may be directed or mailed to the SVWDB Equal Opportunity Officer.

### Reference

P.L 113-128 WIOA Section 181c  
20 CFR Part 683, Subpart F- Grievance Procedures, Complaints, and State Appeals Processes  
20 CFR Part 683, Subpart (d)  
29 CFR Part 38, WIOA Section 188 Nondiscrimination and Equal Opportunity Regulations

### Policy

It is the policy of the Shenandoah Valley Workforce Development Board (SVWDB) to provide workforce services in compliance with the Workforce Innovation and Opportunity Act, state regulations and procedures, as well as the SVWDB's policies and procedures.

### Procedure

The grievance and complaint procedures for the SVWDB apply to alleged violations of the requirements of WIOA and/or provisions of related agreements, policies, and procedures. These grievances or complaints may be submitted by participants and other interested parties affected by the SVWDB system, including one-stop partners and service providers.

### Definitions

The following terms, when used in this policy, have the following meanings unless the context indicates otherwise:

**Complainant** - an individual, group, or agency that files a formal complaint alleging violation of the WIOA and/or provisions of a related agreement/service.

**Grievant** - an individual, group, or agency that files a formal grievance alleging violation of the WIOA and/or provisions of a related agreement/service.

**Interested Parties** - includes sub-grantees, subcontractors, service providers, employees, one-stop partners, and training providers.

**Participant** - an individual who has been determined to be eligible to participate in and who is receiving services (except follow-up services authorized under the WIOA) under a program authorized by the WIOA. Participation commences on the first day, following determination of eligibility, on which the individual begins receiving subsidized employment, training, or other services provided under WIOA.

### Filing A Grievance or Complaint

Examples of who may file a grievance or complaint include the following:

1. Applicants and/or registrants for aid, benefits, services, or training;
2. Eligible applicants/registrants;
3. Participants;

4. Employers;
5. Applicants for employment under WIOA;
6. Service providers; or
7. Eligible service providers.

Each grievance or complaint must be filed with the SVWDB CEO, in writing, within 30 calendar days of the alleged incident and shall contain the following information:

1. The name, address, and phone number of the person filing the grievance or complaint;
2. The date of the alleged situation and the date the grievance or complaint was filed;
3. The identity of the respondent (i.e., the individual or entity against whom the grievance or complaint is alleged);
4. A description of the allegations. This description must include enough detail to allow the reviewer to decide whether the allegations, if true, would violate any of the provisions of WIOA; and
5. The signature of the person filing the grievance or complaint.

Reasonable efforts will be made to ensure that affected participants can understand the policy, including persons who have limited English proficiency.

#### Methods of Resolution/Disposition of Complaints

Upon receipt of the grievance or complaint, the reviewer (SVWDB CEO or their designated representative) will provide written notice to the grievant or complainant. This correspondence will be sent within five (5) business days and shall include the following:

1. A summary of the allegations submitted;
2. The date, time, and place of the meeting or hearing with the reviewer (The SVWDB will attempt to resolve the issue through informal discussions; however, such discussions shall not automatically extend or delay other deadlines contained in this procedure);
3. A notice that an attorney may represent the grievant or complainant; and
4. A notice that the grievant or complainant may present witnesses and documentary evidence.

Individuals involved in grievance investigations are protected from retaliation and are permitted to have a translator, interpreter, reader, and/or a representative of their choice during the grievance process.

The SVWDB has a maximum of sixty (60) calendar days to conduct an investigation of the allegations and offer a resolution. Time frames may be extended for good cause if both parties agree, in writing, to waive the time frames. Any such agreement will outline specific revised deadlines for the written acknowledgement of the grievance or complaint, including setting a hearing date, conducting the hearing, and/or issuing a Notice of Final Action. If by the end of the sixty (60) days from the date on which the complaint was filed, the grant recipient fails to issue a Notice of Final Action, the complainant or grievant may file a complaint directly with the State WIOA Administrative entity (WIOA Title I Administrator).

#### **Notice of Final Action**

Once the investigation is complete and a decision has been reached, a Notice of Final Action shall be sent to the grievant or complainant. If an informal resolution was provided, the Notice of Final Action must summarize the resolution agreed upon. If no informal resolution was provided, the Notice of Final Action shall contain the following information:

1. The reviewer's decision and the reasons supporting the decision;
2. A brief description of the investigation process employed to reach the decision;
3. A notice that, if dissatisfied with the decision, the grievant or complainant may appeal to the Commonwealth of Virginia within thirty (30) calendar days of receipt of the Notice of Final Action; and
4. A notice that the grievant or complainant may seek a remedy authorized under another Federal, State, or local law.

### **Record Keeping Requirements**

Records regarding grievances and complaints shall be maintained for at least three years from the date of resolution of the grievance or complaint.

Records shall include:

1. The name and address of the grievant or complainant;
2. A description of the grievance or complaint;
3. The date the grievance or complaint was filed;
4. The disposition (final action);
5. The date of disposition of the grievance or complaint; and
6. Any other pertinent information.

To the maximum extent possible, the identity of any person who has furnished information relating to, or assisted in, an investigation of a possible violation of the WIOA shall be kept confidential. The information may only be used for purposes of:

1. Record-keeping and reporting;
2. Determining the extent to which an entity is operating its WIOA-funded programs or activities in a nondiscriminatory manner; or
3. Other uses authorized by the nondiscrimination and equal opportunity provisions of WIOA.

Revisions:

October 10, 2019

July 31, 2025

## Policy and Procedure

<b>Title:</b>	Discrimination Complaint Procedures	<b>Number:</b>	OP-12-03
<b>Effective Date:</b>	July 1, 2012	<b>Revisions:</b>	July 31, 2025

### **Purpose**

This procedure shall be used for the investigation of any equal opportunity discrimination complaint against a recipient of USDOL funds, for which a written and signed complaint of discrimination has been received.

### **Reference**

P.L.113-128, Workforce Innovation and Opportunity Act, Section 188, 29 CFR Part 38  
Training and Employment Guidance Letter (TEGL), WIOA No. 37-14  
Virginia Workforce Letter (VWL) #16-09 Change 1

### **Policy**

#### Discussion

CRC vs. SVWDB complaint handling

Any person alleging discrimination under Section 188 of the Workforce Innovation and Opportunity Act has the option of filing his or her complaint with the Shenandoah Valley Workforce Development Board (SVWDB), the State WIOA EO Officer, or with the Civil Rights Center (CRC). The SVWDB's EO Officer has the obligation to inform the complainant of the options. Should the complainant elect to file with CRC, the SVWDB EO Officer should log the complaint and assist the complainant in preparing CRC's Complaint Information Form.

#### Types of complaints

A complaint falls into one of three categories, depending on its source:

1. Individual – a complaint that alleges discrimination against the person filing the complaint;
2. Third party – a complaint filed by a group or an individual that alleges discrimination against another group or individual. The SVWDB EO Officer accepts such complaints if the complainant:
  - a. Can provide the name and telephone number (or other means of contact) of the injured party, and the injured party is willing to file a complaint; or
  - b. Is an organization, such as the National Association for the Advancement of Colored People (NAACP), and can provide names and telephone numbers of the injured parties; or
  - c. Is an authorized representative of an injured party.
3. Class action – a complaint filed by one or more individuals who allege discrimination, not only against themselves, but also against a group of similarly situated individuals.  
To file such a complaint, the complainant must have standing in the class – that is:
  - Be a member of the class, and
  - Be adversely affected by the alleged discrimination.

The purpose of a class action is to secure a remedy that eliminates:

- The discrimination against the person(s) named in the complaint,
- The discrimination against other injured parties, regardless of whether they have been individually named in the complaint, and
- The policy and practices that caused the discrimination.

#### Legal theories of discrimination

Three major legal theories of discrimination can be used to prove illegal discrimination under WIOA and other civil rights laws. These are:

- Disparate treatment
- Disparate impact
- Failure to provide a reasonable accommodation

Disparate treatment means treating someone differently because of their race, sex, age, or other basis *prohibited by law*. To prove a case of discrimination under this theory, it is necessary to examine *why* the person was treated differently and whether a *prohibited factor* was involved.

Disparate impact is based on the premise that discrimination can occur *even if no one is treated differently*. The use of a specific requirement in the decision-making process (for purposes of eligibility, selection, or placement decisions; monetary and non-monetary determination; disciplinary actions, etc.) can be discriminatory if the requirement has an *adverse effect* and if the requirement is *not necessary* to determine the qualifications for the job or training in question. The case will turn on whether the policy or practice in question is a legitimate "business necessity."

Failure to provide reasonable accommodation applies where there is a legal obligation to provide reasonable accommodation, as in the case of a disability or religious belief. Failure to provide a qualified individual with a disability with reasonable accommodation that is legally required – whether by WIOA, the Americans with Disabilities Act (ADA), or Section 504 of the Rehabilitation Act – can be construed as discrimination on the basis of disability, unless providing the accommodation would cause "undue hardship". In general, "undue hardship" means significant difficulty or expense incurred by an LWDB, Workforce Center, Service, or Training Provider. Factors to be considered in determining whether an accommodation would impose an undue hardship on an LWDB, including the difficulty or expense incurred by an LWDB, are outlined in 29 CFR 38.4.

## **Procedure**

### Determining Jurisdiction

The first step in processing a complaint is to determine if it is within the SVWDB's jurisdiction – that is, if the SVWDB has the legal authority to accept the complaint for investigation. Three considerations determine jurisdiction: basis, timeliness, and whether the respondent is a recipient of DOL funds.

**BASIS:** The SVWDB can accept and investigate only those complaints that allege discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I–financially assisted program or activity.

**TIMELINESS:** The SVWDB will ordinarily accept and investigate a complaint only if it is filed within 180 days of the alleged violation. The Director of CRC can waive this time limit if the complainant (a) shows that they were not notified of the time limit and was not otherwise aware of it, (b) was prevented by circumstances beyond their control from filing a complaint, or (c) has some other reason considered sufficient by CRC.

**RECIPIENT OF SVWDB FUNDS:** The SVWDB can accept and investigate only those complaints in which the respondent – the program or activity against which the complaint is filed – is a program or activity funded in whole or in part by SVWDB funds. All programs and activities funded in whole or in part by WIOA are recipients of SVWDB funds and are, therefore, within the SVWDB's jurisdiction.

### Notifying the Respondent and the Complainant

Once it is determined that a complaint is within the SVWDB's jurisdiction, the complaint is investigated by the SVWDB's EO Officer. The EO Officer sends the respondent (the administrator or

Manager of the program/activity receiving funds) notice, which informs them that the SVWDB has accepted the complaint and includes:

- The complainant's name,
- A brief description of the allegation (a copy of the complaint may be provided to the respondent upon request)
- A description of the information or documentation needed for the investigation, and the time by which it is to be submitted,
- A reminder to the respondent that any form of retaliation or intimidation against the complainant because they have filed a discrimination complaint is prohibited, and
- The name and telephone number of the SVWDB EO Officer assigned to the case.

The EO Officer also sends the complainant a notification letter acknowledging receipt of the complaint that includes:

- Notice that the complainant has the right to be represented in the complaint process by an attorney or other individual of their choice.
- Notice of rights contained in §38.35, and
- Notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated into non-English languages upon request.
- A written statement that contains a list of the issues raised in the complaint, and for each issue, a statement of whether the grant recipient will accept or reject the issue and the reasons for each rejection.
- Notification of the time period for fact-finding and investigation.
- Notification of the time period to resolve the complaint.
- Notification that a written Notice of Final Action will be provided within 90 calendar days of the date on which the complaint was filed.

Both the respondent and the complainant are encouraged to informally resolve the complaint prior to the issuance of a determination.

#### Data Collection

A complaint can be investigated in two ways: through analysis of data relevant to the investigation and/or through an on-site investigation. Data needed to determine the merits of the allegations in the complaint should be identified. A written list of questions is forwarded to the respondent, complainant, and other parties, such as witnesses. Some questions will require a written response, some will request records, and others will require documentation. The EO Officer analyzes the data and, if it is sufficient, a determination as to whether or not discrimination occurred may be issued without an on-site investigation.

#### On-Site Investigation

The EO Officer conducts the complaint investigation at the site of the alleged violation when:

- The issues are complicated
- After reviewing the data collected, it is determined that several witnesses must be interviewed or many records examined; or
- The EO Officer has received several similar complaints against the same respondent.

Before arriving on-site, the EO Officer contacts the respondent to establish a date and time for the on-site investigation, to identify records and other documents to be made available for review, and to identify individuals to be interviewed. This should be regarded as an initial information request. As the investigation proceeds, the EO Officer may locate additional information requirements or interviewees. The respondent should identify a person responsible for coordinating the on-site investigation. Once on-site, and before meeting with the respondent, the EO Officer meets with the complainant to review the complaint and to obtain any additional information not contained in the complaint or case file.

The opening conference is held at the respondent's facility; the EO Officer meets with the respondent and/or respondent's representatives to:

- Describe the complaint being investigated, including the specific allegation(s) and issue(s) under investigation and the SVWDB's authority to investigate them;
- Confirm arrangements made by the respondent to assure the EO Officer privacy, including setting aside a private area for the EO Officer to conduct interviews and review documents.
- Confirm the interview schedule of individuals named in the complaint, as well as other witnesses; and
- Schedule other meetings, if possible, such as the initial meeting for information collection and the tentative date of the exit conference.

Normally, the EO Officer does not discuss the merits of the complaint during the opening conference.

### Gathering Evidence

In an on-site investigation, the EO Officer gathers evidence by interviewing and by reviewing records. Initially, the EO Officer interviews the official(s) representing the respondent and the person(s) named in the complaint. Information obtained includes:

- The respondent's account of the facts,
- Additional persons the respondent wishes to be interviewed and the matters on which each witness can be expected to provide information, and
- Documentation that the respondent wishes to review.

The EO Officer also interviews witnesses – that is, all individuals named either by the complainant or the respondent as witnesses. As the investigation progresses, the EO Officer may identify additional individuals who should be interviewed. In addition to conducting interviews, the EO Officer gathers information by reviewing records and other documents, beginning with those initially requested. As the investigation progresses, the EO Officer may require additional records. When the records required are voluminous or complex, the EO Officer may hold a meeting with the staff responsible for keeping records to:

- Acquaint the EO Officer with the respondent's information system,
- Acquaint the respondent with the EO Officer's information needs, and
- Assign specific document or information requests to the appropriate person.

### Types of Evidence

In general, evidence falls into four categories:

Direct evidence is evidence of the actual, subjective intent of the person(s) charged with discrimination. It may take the form of an admission of discriminatory purpose, although this will rarely occur. You will most often find such an admission during an interview, when a person is explaining or justifying their actions. Direct evidence encompasses more than admissions: it also includes any facts tending to establish the subjective motives of persons involved in the alleged discrimination.

Circumstantial evidence includes facts from which one may infer intent or discriminatory motive. Circumstantial evidence proves intent by using objectively observable data. It does not, however, prove anything directly about actual subjective intent – for example, historical information on how the respondent has treated members of the protected group, and if there are similar complaints.

Comparative evidence is that which identifies differences in treatment of similarly situated individuals based on their race, sex, or other protected basis. For example, this might involve comparing the quality and quantity of services provided to a group of the same race with services provided to a group of a different race. If there is no adequate non-racial explanation for the differences, it is reasonable to infer that race may be a factor.

Statistical evidence is most often used to demonstrate the adverse effect of a procedure, policy, rule, or selection criterion. The evidence will have to show that a substantial disparate impact exists, and that it is not due to chance. Such evidence may include EO data reports and monitoring reports.

### Exit Conference

When the on-site investigation has been completed, the EO Officer may hold an exit conference with the respondent to clarify the information obtained during the on-site investigation or to request additional information. The EO Officer expresses no opinion about the information collected during the on-site investigation and makes no analysis or conclusions about the issues.

### Administrative Closures

Pre-investigative administrative closures occur prior to the initiation of the investigation.

A pre-determination administrative closure is one that occurs between the initiation of an investigation and before an investigative report is drafted. Investigations may not be administratively closed if they imply or involve class issues, which have not been corrected for all members of the class. Investigations that are not class involved may be administratively closed if one or more of the following conditions exist – that is, if the complainant:

- Refused to cooperate in the investigation;
- Cannot be located;
- Is deceased;
- Withdraws the complaint in writing; or
- Accepts that the matter has been fully resolved through mediation or conciliation.

If the complainant can be located, he or she must be notified in writing that the complaint is being administratively closed, and the reason for the decision must be explained. The closure letter shall be sent to the last known address of the complainant. It shall also advise the complainant of their right to file a complaint with the CRC within 30 calendar days of receipt of the letter of closure.

### Analysis of Evidence

#### Disparate Treatment

To determine if it is reasonable to believe that discrimination based on disparate treatment occurred, a three-phase analytical process will be used. This process is as follows:

#### Phase 1: Prima facie

This phase is a determination as to whether there is sufficient evidence to raise an inference of discrimination. An inference *does not prove* discrimination; instead, it allows you to go on to the next analytical step(s) – determining whether the inference is correct. An inference of discrimination based on disparate treatment can be established when an eligible/qualified individual shows that he or she was treated differently because of a prohibited factor.

In the case of systemic or pattern-of-practice discrimination, an inference of discrimination may be established by showing that individuals or groups are treated differently based on race, sex, or some other prohibited factor.

The Supreme Court created a template for establishing a case by inference based on disparate treatment. The elements of a prima facie case may vary depending on the facts of the complaint, but such elements often include the following:

1. The aggrieved person was a member of a protected class;
2. The person applied for, and was eligible for, a federally assisted program or applied and was qualified for employment;
3. Was denied services or employment despite being eligible/qualified; and
4. After this denial, the respondent selected applicants for services or employed persons not in the complainant's group with similar eligibility or qualifications.

#### Phase 2: Rebuttal

The second phase is the respondent's opportunity to defend itself. If there is sufficient evidence to establish a prima facie case, the investigator must determine if the respondent can articulate a "legitimate, nondiscriminatory reason" for the challenged action. For example, in a case of individual discrimination, the respondent might explain that the complainant was not as qualified as the applicant selected for employment, or that the complainant applied for training at a time when there were no vacancies. In the case of systemic discrimination based on disparate treatment, the respondent might explain the low placement of women in auto mechanics by showing that the women who applied were not as qualified as the male applicants.

### Phase 3: Indications of Pretext

Once the respondent has articulated a reason for the disparate treatment, the investigator must examine the respondent's reasons and evidence relevant to the complaint. Where facts are in dispute, the investigator should attempt to corroborate the facts independently. If the respondent's defense is not based on a legitimate requirement, the investigator may show that the rebuttal evidence presented by the respondent was a "pretext" for discrimination. Types of evidence that may be helpful in proving pretext are:

- The respondent failed to follow its own rules, policies, and procedures;
- The respondent acted inconsistently with its own stated, legitimate nondiscriminatory reason;
- The evidence obtained in the investigation contradicts the nondiscriminatory reasons; or
- The reason offered now was not offered to support the challenged decision at the time it occurred, suggesting the reason was offered as an afterthought.

### Disparate Impact

The model for proving discrimination based on disparate impact is different from the disparate treatment model because the underlying theory is different. Rather than seeking to prove that the service or training provider had a discriminatory motive, you are seeking to prove that a policy, requirement, or practice has a *disproportionate effect* on a particular group or groups. Indications of disparate impact are most likely to arise in the context of a compliance review.

### Determining Adverse Impact

The investigator will need to develop evidence that can be tested for adverse impact by making a comparison of the effects of the policy, requirement, or practice in question on members of the complainant's protected class with persons not in the protected class. The evidence in an investigation of a case involving disparate impact will likely include both *statistical* and *comparative* evidence (see "Types of Evidence"). The first step is determining whether there is disproportionate representation of protected class members participating in the program in question (for example, four percent of participants in a training program are female, while fifty percent of the applicants are female). In this case, the investigator will want to look at the application process and other aspects of program administration to determine if there is evidence that a policy or practice is causing the disparity. If there is a statistically significant disparity between the representation of protected class members remaining after application of the challenged policy or requirement when compared with the representation of persons not in the protected class, a *prima facie* case has been established.

### Identifying the Cause of the Adverse Impact

After determining that the numbers show significant differences, the next step is to determine what caused the disparities. The investigator must identify which policy, requirement, or practice accounts for the adverse impact. That requires focus on the points in the decision-making process where some applicants become participants and others do not. (For example, identifying which requirements or practices have the result of screening out more women applicants than you would expect to be screened out, given the number of women applicants.)

### Business Necessity

Identifying the requirements or practices that have an adverse impact *does not prove* disparate impact discrimination. A determination must be made as to whether the requirement that has the adverse impact is *job-related and necessary*. (For example, a requirement that a firefighter trainee weigh at least 150 pounds could disproportionately screen out women as a group, even if some women can meet the requirement and some men cannot.) In this scenario, the service or training provider would have to provide evidence that the weight requirement is necessary for a job-related reason (for example, evidence that the weight test is an accurate predictor of a person's ability to handle firefighting equipment).

### Identifying Alternative Practice

Even if the weight test accurately predicts success in firefighting, if it has an adverse impact, the service or training provider must first try to devise a standard that *does not have an adverse impact* to determine whether an applicant can handle the equipment.

### Post-Investigation Investigative Report

An investigative report is a written document that sets out in a detailed and logical fashion (a) all facts pertinent to the case, (b) analyzes those facts in light of the complainant's allegations, and (c) recommends a determination as to the validity of the allegations based on that analysis. The following is a suggested format:

- Introduction
- Allegations
- Analysis
- Conclusions
- Recommendations

The investigative report should be a document separate from the formal Final Notice of Findings letter. Generally, the investigative report is not released to the complainant or the service or training provider except in the case of a Freedom of Information Act request or Privacy Act request. Ideally, an investigative report should be prepared whenever a full investigation is completed. If an investigative report is not done in every case, it should certainly be prepared for complex cases that involve extensive analysis. An investigative report should also be prepared for all cases resulting in a violation. If the case is straightforward, raises only limited issues, does not involve significant rebuttal by either party, and results in a no-violation finding, an investigative report may not be necessary.

#### Final Notice of Findings

The purpose of the letter of findings is to notify the parties in writing of the determination made on each issue. Letters of findings must be prepared for all investigations, regardless of whether a violation is found. A written Notice of Final Action must be sent within 90 days after the filing date of the complaint. Complainants must be notified of their right to file a complaint with CRC if they believe the determination is unsatisfactory.

Each letter of findings shall:

- State the jurisdictional authority, including the basis for the investigation.
- Address all issues covered in the investigation, and for each issue, reach conclusions that are supported by an explanation or analysis; and
- State the determination for each issue investigated
- Where violations are found, take direct corrective action to resolve the matter at hand and to prevent future occurrences.
- Make any other recommendations to improve policies or practices.

Revisions:

September 14, 2017

July 31, 2025



## Shenandoah Valley Workforce Development Board

### BOARD DECISION BRIEF SVWDB Policy Updates

**Date:** July 31, 2025

**Reference:** WIOA Local Policy Revision

**Background:** Under the Workforce Innovation and Opportunity Act (WIOA), an Individual Training Account (ITA) is a payment arrangement that allows a Local Workforce Development Board (LWDB) or its service provider to pay for a participant's training services directly with a training institution. This is primarily used for Adult and Dislocated Worker programs and, if appropriate, for eligible Youth Program participants. The training must be on the state's Eligible Training Programs List (ETPL).

LWDBs establish ITA policies to guide how ITAs are used to provide training services to eligible participants.

**Issue:** Training provider costs have increased over the past two years. This rise in training costs requires the policy to raise the limit on training cost per participant.

**LWDA 4 OP-12-07 Individual Training Account Policy Revisions:**

**Key Changes:** At the bottom of page 2: Procedures #7. Cost Limitation. The cost limit increased from the current limit of \$5,800.00 to the recommended amount of \$6,200.00

**Summary:** SVWDB staff strongly recommend that the Board approve the proposed increase in costs per participant, as it is essential for maintaining quality and ensuring the continued success of our programs.

**Action Needed:** SVWDB approval of revised policy.

**Effective Date:** July 31, 2025



## Policy and Procedure

<b>Title:</b>	Individual Training Accounts (ITA)	<b>Number:</b>	OP-12-07
<b>Effective Date:</b>	March 29, 2012	<b>Revised:</b>	07/31/2025

### Purpose

The purpose of training is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. This procedure is intended to define and establish parameters for Individual Training Accounts (ITA) development and expenditures for Adults, Dislocated Workers and Out of School Youth. ISY between the ages of 18 and 21 may co-enroll in the WIOA Adult program if deemed appropriate.

### Reference

- 1 Public Law 113-128, Workforce Innovation and Opportunities Act (WIOA) Sec. 122, 134
- 2 Dept. of Labor TEGL 41-14
- 3 VCCS Virginia Workforce Letter 14-17
- 4 Dept. of Labor TEGL 21-16

### Description

A WIOA-eligible registrant is enrolled in a training program if the Individual Employment Plan (IEP) supports that the training is necessary to transition the participant into the workforce. The training must support the stated purpose of WIOA and be in accordance with the description of training as contained in the Act. Whenever feasible, training vendors will be requested to allow participants to receive credit for required courses when equivalent courses have been completed and can be documented from other training institutions. Additionally, costs associated with CLEP Testing will be treated as a training cost if the testing relates to the curriculum of study.

### Procedure

- 1) Eligibility. All recipients of training funds must be eligible based upon criteria established under the Act. WIOA requires the coordination of training costs with funds available under other grant assistance {Section 134(d)(4)(B)}. **WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources, including PELL Grants, to pay for the costs of their training or require assistance beyond that available under grant assistance from other sources, including PELL Grants, to pay the costs of such training.** To avoid duplicate payment of costs when an individual is eligible for both WIOA and other assistance, including a PELL Grant, case managers shall consider all available sources of funds, excluding loans in determining an individual's overall need for WIOA funds. Individuals must maintain an active application status for PELL assistance. The exact mix of funds shall be determined based on the availability of funding for either training costs or supportive services, with the goal of ensuring that the costs of the training program the participant selects are fully paid, and that necessary supportive services are available so that the training can be completed successfully. **The total training budget will be supplied by the vendor based upon a formula used by institutions that determine financial aid.**
- 2) Occupational Areas of Training. The training provided through ITAs is for the sole purpose of facilitating transition into the workforce. All training will be for occupations in demand in the labor market and determined to be of priority by the SVWDB. To assist in the approval of ITA requests, the Virginia Community College System provides a relevant database for identifying appropriate

areas of training. All training must be supported by local labor market data that is furnished by the Virginia Employment Commission, Weldon Cooper Center or other appropriate source.

**Special Training.** Requests for a waiver in order to provide Special Training may be considered by the SVWDB. Such requests must be approved in advance by the SVWDB CEO. Participants requesting training in occupations not designated as a priority by the Board and/or not supported by local labor market data, but whose Individual Employment Plan supports pursuit of such training must meet at least one of the following conditions:

- a) The participant is planning to relocate to a geographic location where the occupation is in demand;
  - b) An area employer provides documented support for the need for trained personnel in a particular occupation; or
  - c) A written commitment is provided by an employer to hire the individual upon completion of their training.
- 3) Training Selection. Training will be provided for priority occupations only as determined by the Board by an institution or organization certified as meeting the criteria and having completed the procedures outlined to be a SVWDB approved training provider. Participants will select from the list of providers certified by the SVWDB. Training providers certification may be based on factors such as, but are not limited to, overall performance; industry skill standards; performance for significant customer groups (which includes wage replacement rates for dislocated workers); performance of specific provider sites, current information on employment and wage trends and projections; and duration of training programs.
- The Virginia Workforce System provides a consumer report system with information necessary to choose a provider or program of training services. The database has direct access or links that easily identify providers by region, types of training, provider credentials, costs, class schedules, success rates, and feedback from previous customers, students and clients. These profiles detail information about the character of the institution and provide a wide variety of career education and training options.
- 4) Length of Training. The purpose of training services is to provide eligible customers with the means to obtain the necessary skills to become gainfully employed or re-employed. Training length will vary according to the type of training and the requirements outlined in the vendor agreement. Because entering or returning to the workforce is a priority under WIOA, training cannot exceed more than 24 calendar months. If the participant IEP includes training lasting more than 24 months, a waiver must be requested PRIOR to beginning the training.
  - 5) Repeat Training. The SVWDB will NOT provide funding for courses/programs previously funded but not successfully completed.
  - 6) Individual Training Account Procedure. Training provided to participants can be provided only by approved training vendors from the statewide list of Eligible Training Providers as certified by the Virginia Workforce Council and/or the SVWDB Eligible Providers List. All training (with the exception of on-the-job training and customized training) must be secured utilizing the ITA authorization. All ITA authorizations will be submitted to the training facility financial aid office.
  - 7) Cost Limitation. The SVWDB limits training cost (Per Participant) to no more than **\$6,200 for classroom training or \$8800 if an individual participates in an OJT after completion of classroom training** within a fiscal year (July 1 through June 30), except as approved by the SVWDB CEO prior to the expenditure of funds. Funding of training, supportive services and needs-related payments may not exceed a total of **\$14,750** per fiscal year. (See Policy for Supportive Services).
  - 8) Required ITA Documentation to be maintained in participant file: copy of curriculum, class schedule, begin and end dates of training, copy of service providers "Obligation Form," Payment Authorization to training provider, invoice from training provider, proof of payment, copy of participant grades, and copy of license/certification.

All WIOA registrants will be made aware of any excess cost of training not covered by the program for which they will be responsible. Program operators are expected to work closely with participants to determine the individuals' ability to contribute to the cost of training and negotiate a funding plan that will adequately meet the needs of the participant while using WIOA funding in the most efficient manner possible. In addition to funds specifically included in their contract, the operator may have an amount allocated to them to provide participant training which is then paid directly by the SVWDB to the approved training provider.

9) Administration. All requests for ITA funding must be supported in the participant's IEP. Regular contact with the participant is required. All participants are required to complete face-to-face training performance reviews with their case manager on, at minimum, a quarterly/semester/module basis in accordance with the timeframes outlined on the IEP. ITA funding is only authorized on a semester/quarterly/module basis and requires documentation that the participant has successfully completed previous work. This necessitates that the participant maintains ongoing contact with the case manager, and allows for discontinuation of funding for students who are not performing or demonstrating satisfactory progress toward completion of training goals. Students are expected to maintain no less than a cumulative 2.0 grade point average for the year in order to continue to receive WIOA funding.

### **Waivers**

A waiver to the above maximum specifications may be requested from the SVWDB CEO on a case-by-case basis. The necessity for waiver must be sufficiently justified and documented in order for a waiver to be approved.

Revisions:  
September 14, 2017  
August 22, 2018  
October 13, 2022  
July 31, 2025

**Equal Opportunity Employer/Program**  
**Auxiliary aids and services are available upon request to individuals with disabilities**  
**TDD: VA Relay Center: 711 or 800.828.1120**  
*a proud partner of the American Job Center Network*

This workforce product was created using 100% of federal U. S. Department of Labor Employment and Training Administration Workforce Innovation and Opportunity Act (WIOA) award of \$1,460,148 (#AA-33260-19-55-A-51) made to Page County on behalf of the Shenandoah Valley Workforce Development Area by the pass-through entity, the Virginia Community College System. No costs of this product were financed by nongovernmental sources. The information contained herein does not necessarily reflect the official position of the U.S. Dept. of Labor.