NORTHERN AREA LOCAL WORKFORCE DEVELOPMENT BOARD

Workforce Innovation and Opportunity Act Local Plan Modification

Program Years 2024-2027 | PY2026

Serving Cibola, Colfax, Los Alamos, McKinley, Mora, Rio Arriba, San Juan, San Miguel, Santa Fe, and Taos Counties

DRAFT 1 - BOARD REVIEW

Prepared August 28, 2026

*This draft is organized to the PY2026 NMDWS Local Plan Modification Guidance and incorporates the current labor-market, Title I performance, ETPL, O*NET, county, provider-outcome, and monitoring analysis compiled for the Northern Area.*

Drafting Process for Plan Modifications

Item	Current draft status/action needed
Local Board Chair/ Area Director	Jon Paul Romero, Board Chair; Lisa Ortiz, Executive Director
One-Stop Operator	Nina Valdez-January 1, 2026-June 30, 2029
Board roster and standing committees	Attachment B Included
MOUs / cooperative agreements / IFA	Attach current executed agreements and verify effective dates; finalize Attachment D and IFA update.
PY26/PY27 negotiated performance levels	Attachment E is pending
Funding/service levels	Performance is included
Public comment	Pending
Youth “additional assistance” definition	Confirm whether the Board uses this eligibility category; if yes, insert the adopted local definition/policy in Attachment A.
Basic-skills assessment process	Pending
Fiscal agent	Zlotnick & Sandoval PC
Policy attachments	Policies are included

Table of Contents

Table of Contents will update when opened in Word.

If page numbers do not populate automatically, open the document in Microsoft Word and update the Table of Contents field after the draft is finalized.

Executive Summary

The Northern Area Local Workforce Development Board (NALWDB) serves a ten-county region with markedly different labor markets, population patterns, transportation networks, broadband access, education levels, employer concentrations, and training capacity. The PY2026 modification therefore uses one regional strategy with county-responsive implementation rather than assuming that a single service or training model will work equally well across the area.

Current evidence shows a central planning challenge: Northern Area participants are connecting to employment, but the system is less consistent in converting participation into recognized credentials, measurable skill development, and stronger earnings. PY25 Youth Measurable Skill Gains were 32.47 percent against a 79 percent target, and Youth Credential Attainment was 35.71 percent against 55 percent. Adult Median Earnings were $6,801 against a $9,500 goal, and Dislocated Worker Credential Attainment was 45.45 percent against 65 percent. Adult MSG, by contrast, was a relative strength at 86.71 percent, and employment outcomes were generally stronger than the measures showing the largest gaps.

The labor market also demonstrates a mismatch between opportunity and training access. Health Care and Social Assistance is the largest current employment sector; Professional, Scientific, and Technical Services is both large and projected to grow; education/public service and construction provide important pathways; and hospitality, retail, and arts remain major sources of entry employment. Yet regional Title I training activity is heavily concentrated in Transportation/Material Moving, while approved ETPL capacity is uneven across counties. Four Northern counties have no approved ETPL program physically located in the county, three additional counties rely on a single local provider, and several high-demand occupational clusters have relatively thin training utilization or local capacity.

NALWDB will respond by moving from a placement-centered model to a career-mobility and quality-outcome model. The Board will align training and work-based learning with current and projected employer demand; continuously review ETPL capacity and provider outcomes; expand access to healthcare, professional/technical, education/public-service, construction/maintenance and other locally validated pathways; use Transitional Jobs, OJT, Registered Apprenticeship/pre-apprenticeship and Youth Work Experience according to participant readiness and program requirements; resolve barriers earlier; and use monitoring and quality assurance as front-end performance tools rather than only after-the-fact compliance functions.

Source: *NMDWS PY2026 Local Plan Modification Guidance; NALWDB PY2026 ETPL-Integrated Strategy Report; PY25 Executive Performance Summary; FutureWorks Title I reports; PY25 Comprehensive Monitoring Report.*

Operational Elements

20 CFR §679.580 requires the Local WDB and chief elected officials to review the four-year plan after the first two-year period and modify it to reflect changes in labor-market and economic conditions and other factors affecting implementation. The sections below identify the changes that materially affect the Northern Area strategy and operations.

A. Local Workforce Structure

The principal change is not a single industry shock but a clearer picture of a region with modest overall growth, substantial replacement demand, uneven county conditions, and a growing need to match participants to specific occupations rather than broad sector labels. Northern Region employment is projected to increase from 201,683 in 2024 to 210,044 in 2034, a net gain of 8,361 jobs (4.1 percent), while projected annual openings across all industries are much larger because exits and occupational transfers create continuing replacement demand.

The July 2026 Northern Region labor force totaled 217,907, with 205,472 employed and 12,435 unemployed, for a 5.7 percent not-seasonally-adjusted unemployment rate. The region's population declined slightly from 513,128 in 2014 to 511,156 in 2024 (-0.38 percent), while New Mexico and the United States grew over the same period. These conditions increase the importance of labor-force participation, worker retention, re-engagement of residents outside the labor force, and cross-county labor-shed strategies.

The current demand picture is diversified. In Q1 2026, Health Care and Social Assistance employed 32,068 workers; Accommodation and Food Services 23,173; Retail Trade 22,804; Professional, Scientific, and Technical Services 20,792; Public Administration 19,808; Educational Services 18,497; and Construction 10,360. Long-term projections show especially strong net growth in Professional/Scientific/Technical Services (+2,320; +11.1 percent), Accommodation/Food Services (+2,044; +8.5 percent), Arts/Entertainment/Recreation (+831; +19.0 percent), Education (+726; +4.0 percent), Health Care (+675; +2.3 percent), and Construction (+498; +5.6 percent), while Mining/Oil/Gas and Utilities are projected to contract.

Source: *NMDWS LAUS, July 2026; QCEW Northern Region Industry Employment Distribution, Q1 2026; NMDWS ER&A 2024-2034 Northern Region industry projections; U.S. Census population comparison used in the Board's PY2026 strategy analysis.*

2. Funding and Service Levels

The funding and service-level projections presented below reflect the Board's validated allocation data for the applicable program years and provide the basis for planning future service delivery. Overall funding trends indicate the need for increasingly strategic use of WIOA resources across the Northern Area. As allocations decline, NALWDB will prioritize services and training investments based on county-level labor market information, employer demand, participant needs and barriers, demonstrated training-provider outcomes, and opportunities for credential attainment, employment, and wage progression.

Service strategies will be adjusted by funding stream to reflect the distinct needs of Adult, Dislocated Worker, and Youth participants while maintaining reasonable access to services throughout the ten-county service area. The Board will continue to monitor allocations, expenditures, participant demand, and performance outcomes and will adjust service levels and investment priorities as necessary to maximize the impact of available funds.

Program	PY24 actual	PY25 actual	PY26 Allotment	Planning explanation
Adult	$1,396,945.00	$1,127,964.00	$1,028,648	Because of these decreases, NALWDB will prioritize training and career services based on county-level LMI, identified in-demand occupations, employer needs, participant barriers, and training outcomes.
Dislocated Worker	$2,128,924.00	$1,614,379.00	$1,367,895.00	Because of these decreases, NALWDB will prioritize resources for timely reemployment and skills development for affected workers. Training and career services will be directed by county-level LMI, employer demand, layoffs, industry trends, and transferable skill opportunities.
Youth	$1,209,445.00	$973,093.00	$874,114.00	Because of these decreases, NALWDB will focus resources on services that most directly support credential attainment, MSG, work-based learning, and successful transitions to employment or postsecondary education. County-by-county LMI, in-demand career pathways, participant barriers, and employer needs will guide investments.

C. Subsequent Local Board Certification

Consistent with WIOA §107(c)(2), NMDWS will review the Northern Area for subsequent Local Board certification based, in part, on the extent to which NALWDB has ensured that workforce investment activities carried out in the local area support achievement of the applicable performance accountability measures and sustained fiscal integrity as defined in WIOA §106(e)(2).

This modification strengthens the Board's approach to subsequent certification by connecting performance, fiscal oversight, monitoring, and corrective action within a continuous-improvement framework. Rather than relying solely on annual performance results or audit findings, NALWDB will continue to use current performance data, fiscal information, program and fiscal monitoring, provider outcomes, audits, participant-file review, expenditure reconciliation, and corrective-action follow-up to identify risk and document the Board's response.

Performance Accountability. NALWDB will continue to review Adult, Dislocated Worker, and Youth performance against negotiated levels and use results to identify both successful practices and areas requiring intervention. PY25 results demonstrate strengths in several employment measures and Adult Measurable Skill Gains but also identify significant improvement needs, particularly in Adult Median Earnings, Dislocated Worker Credential Attainment, Youth Credential Attainment, and Youth Measurable Skill Gains. Accordingly, this modification incorporates targeted strategies addressing earlier identification of barriers, career-pathway and credential planning, training-provider performance, work-based learning, education-provider coordination, documentation of measurable progress, employer alignment, supportive services, and timely follow-up.

Performance below a negotiated level will trigger review of the underlying participant, provider, geographic, training, or service-delivery factors rather than being addressed solely as an end-of-year performance issue. NALWDB will continue to use program monitoring, provider performance review, county and regional LMI, ETPL outcomes, and participant-level data to identify where corrective action, technical assistance, service redesign, or additional Board direction is necessary. Progress will be reviewed through established Board and administrative oversight processes and incorporated into subsequent service-provider expectations.

Sustained Fiscal Integrity. For purposes of subsequent certification, NALWDB will apply the statutory definition of sustained fiscal integrity in WIOA §106(e)(2). Under that provision, sustained fiscal integrity means that the Secretary of Labor has not made a formal determination during either of the two consecutive years preceding the determination that the grant recipient or administrative entity misexpended WIOA Subtitle B funds because of willful disregard of applicable requirements, gross negligence, or failure to comply with accepted standards of administration.

NALWDB will continue to support fiscal integrity through strengthened internal controls, expenditure and General Ledger reconciliation, procurement and contracting controls, subrecipient and provider monitoring, payment verification, documentation standards, audit resolution, corrective-action tracking, and follow-up monitoring. Since the original Local Plan, the Board has expanded quality-assurance and monitoring activity, strengthened electronic-file and documentation requirements, increased attention to payment and reconciliation controls, and used monitoring findings to identify areas requiring provider training, technical assistance, policy revision, and corrective action.

Audit, monitoring, or program findings will not be characterized as resolved until sufficient documentation supports closure. NALWDB will maintain and provide current evidence of fiscal and administrative oversight, including applicable audit reports, NMDWS and local monitoring results, corrective-action records, fiscal reports and reconciliations, procurement records, provider monitoring, and documentation of resolution or continuing action on identified deficiencies.

For subsequent certification, NALWDB will provide NMDWS with evidence demonstrating the Board's oversight of performance and fiscal integrity, including the actions taken when performance measures, monitoring results, or fiscal reviews identify risk. The Board will continue to use these results to refine policies, strengthen

service-provider accountability, improve participant outcomes, and maintain appropriate stewardship of WIOA funds throughout the remainder of the Local Plan period.

D. Attachment A-Policy Alignment

Attachment A incorporates the current Board-approved policies governing WIOA implementation and has been reviewed for consistency with PY2026 guidance and applicable federal and state requirements. The policy set reflects current definitions, fiscal and programmatic controls, expenditure requirements, documentation standards, monitoring expectations, and governing references used throughout this Local Plan modification.

NALWDB will continue to review Board policies on an ongoing basis to identify and incorporate changes in federal or State statutes, regulations, Uniform Guidance, NMDWS directives, federal guidance, funding requirements, audit or monitoring expectations, and other applicable authorities. Policies will be revised, clarified, or replaced as needed to remain aligned with current requirements and operational practices. Where regulatory or administrative changes affect service delivery, eligibility, fiscal controls, documentation, procurement, monitoring, or other WIOA functions, corresponding policy updates will be presented through the Board's established review and approval process and incorporated into implementation of the Local Plan, as appropriate.

E. Infrastructure Funding Agreements

NALWDB maintains an Infrastructure Funding Agreement (IFA) and related one-stop partner agreements consistent with the current American Job Center configuration and applicable WIOA requirements. The agreements establish each partner’s proportionate share of allowable infrastructure and other shared costs and provide the framework for allocating costs based on partner benefit and use of the one-stop delivery system.

The current IFA effective period, participating partners, cost-allocation methodology, and any material changes in partner contributions or one-stop center configuration are reflected in the applicable executed agreements. NALWDB will review and update the IFA and related agreements as necessary to ensure continued alignment with the one-stop delivery structure, partner participation, and federal and state requirements.

F. WIOA Implementation Highlights

Since implementation of the original 2024–2027 Local Plan, NALWDB has completed several significant program, policy, monitoring, and service-delivery improvements that provide the foundation for this PY2026 Local Plan Modification.

NALWDB has strengthened its quality-assurance framework by developing a formal monitoring policy and a more comprehensive approach to programmatic and fiscal review. During PY25, the Board completed expanded monitoring of Adult, Dislocated Worker, and Youth services across the Northern Area, using participant-file review, fiscal and payment reconciliation, performance data, provider practices, and county-level findings to identify both effective practices and areas requiring corrective action or technical assistance. Monitoring is now being used as an ongoing management tool rather than solely as a periodic compliance activity.

The Board also completed implementation of the Electronic File Policy, establishing more consistent requirements for participant-file organization, documentation, accessibility, and maintenance within the electronic case-management environment. Training and technical assistance were provided to service-provider staff to support implementation, and continued monitoring will evaluate whether required documentation is complete, timely, and sufficient to support eligibility, services, payments, performance outcomes, and audit review.

Youth program implementation has also been strengthened through targeted training and technical assistance to YDI. This has included Youth OJT training and additional emphasis on Work Experience documentation,

learning objectives, eligibility, Objective Assessment and ISS development, activity management, Measurable Skill Gains, credential documentation, and the connection between work-based learning and longer-term career pathways. These efforts respond directly to issues identified through monitoring and performance review and will continue to be evaluated through follow-up monitoring and participant-level quality assurance.

NALWDB has also undertaken an in-depth review of its local WIOA policies to identify outdated regulatory references, definitions, thresholds, documentation requirements, and operational provisions. Policies are being revised and updated to align with current WIOA regulations, Uniform Guidance, NMDWS requirements, federal guidance, and current program operations. This review has included strengthening fiscal, procurement, monitoring, supportive-service, training, work-based learning, electronic-file, eligibility, and other program controls. Policy review will continue as federal or State requirements change so that local policy remains aligned with governing authority.

Fiscal and program oversight has been strengthened through increased attention to payment authorization, supporting documentation, reconciliation between participant records and fiscal records, training-provider payments, work-based learning expenditures, and corrective-action follow-up. Monitoring findings are being used to identify where additional internal controls, staff training, supervisory review, or procedural clarification are necessary.

A significant accomplishment of the modification process has also been expanding NALWDB's use of data for local planning. The Board has moved beyond reliance on regional averages by conducting a deeper review of each of the ten counties' economic assets, workforce barriers, service-access conditions, training capacity, ETPL availability, educational resources, employer demand, and sector opportunities or transition risks. This analysis recognizes that the Northern Area includes substantially different labor markets, from the professional and technical employment concentration in Los Alamos, to energy-transition needs in San Juan, tourism economies in Taos and Colfax, Tribal and rural communities in McKinley and Cibola, and counties such as Mora where distance, broadband, and limited local training capacity significantly affect access.

Building on this work, NALWDB has developed a more data-driven ETPL and training-capacity strategy. Rather than treating the ETPL as a static statewide list, the Board will continue to compare approved training capacity and provider outcomes with current LMI, employer demand, postsecondary and CTE resources, participant characteristics, geographic access, training utilization, credential attainment, employment, and earnings. Where existing educational resources are not represented on the ETPL, the Board will work with appropriate institutions to identify programs that may warrant consideration for State ETPL eligibility. Where local training cannot reasonably be developed, Career TEAM and YDI will use cross-county, hybrid, work-based learning, apprenticeship, and partner-supported pathways to improve access.

These accomplishments establish the basis for the next phase of implementation. During the remainder of the Local Plan period, NALWDB will continue to use monitoring, performance results, fiscal review, LMI, ETPL analysis, provider outcomes, and county-level conditions to refine service strategies, direct technical assistance, strengthen provider accountability, address identified service gaps, and ensure that Adult, Dislocated Worker, and Youth services respond to the differing workforce and economic conditions across the Northern Area.

Source: *PY25 Comprehensive Monitoring Report; NALWDB PY2026 ETPL-Integrated Strategy Report.*

Strategic Planning Elements

A. Economic and Workforce Analysis

This analysis responds to 20 CFR §679.560(a)(1)-(4) by examining demand, labor supply, participant characteristics, and the capacity of the workforce system together. The purpose is not to list economic facts in isolation, but to identify the gaps that WIOA resources can reasonably address.

Current Industry Structure and Projected Demand

Sector	Q1 2026 employment	2024-2034 direction	Planning implication
Health Care & Social Assistance	32,068	+675 / +2.3%	Largest current sector; replacement demand, rural care, and credential ladders remain central.
Accommodation & Food Services	23,173	+2,044 / +8.5%	Large entry sector; emphasize supervisory, culinary-management, and year-round advancement.
Retail Trade	22,804	+567 / +2.5%	Major placement source but lower earnings; use as an entry point rather than an endpoint.
Professional, Scientific & Technical	20,792	+2,320 / +11.1%	High-value growth cluster; build technical/support bridges and cross-county pipelines.
Public Administration	19,808	Government +1,197 / +4.2%	Public-service, administrative, technical, and facilities pathways.
Educational Services	18,497	+726 / +4.0%	Large employer base with utilization/training gap in education pathways.
Construction	10,360	+498 / +5.6%	Strong fit for apprenticeship, OJT/TJT, maintenance/repair, and portable credentials.
Mining/Oil/Gas	4,633	-661 / -14.3%	Rapid Response and DW transition priority.
Utilities	987	-202 / -20.5%	Translate technical skills to maintenance, construction, and adjacent occupations.

Source: *NMDWS QCEW Q1 2026; NMDWS ER&A 2024-2034 Northern Region projections. QCEW and projection base estimates use different methods and should not be reconciled as the same series.*

Immediate Employer Demand

On August 26, 2026, the Board's NMDWS online-advertised-jobs extract showed 10,729 openings in the Northern Region. Only 2,033 postings (18.9 percent) included wage information, so the reported median advertised wage of $61,131 should not be generalized to all openings. The ten employers with the most postings accounted for 2,973 openings (27.7 percent of the snapshot), illustrating the importance of anchor-employer relationships while also preserving services for small employers.

Employer in posting snapshot	Online openings
Los Alamos National Laboratory	1,010
CHRISTUS Health	735
San Juan Regional Medical Center	230
Presbyterian Healthcare Services	202
Santa Fe Public Schools	197
Gallup-McKinley County Schools	155
Addus HomeCare	112
AHS Staffing	111
New Mexico State Personnel Office	111
Walmart	110

Source: *NMDWS Online Advertised Jobs, Jobs De-duplication Level 2, August 26, 2026. Online postings are point-in-time advertised demand and are not equivalent to hires or unique vacancies.*

Occupational Demand and Training Requirements

The Northern occupational outlook is used as a supplemental lens until the corresponding 2024-2034 occupational outlook is available. "Typical education needed for entry" is a BLS/NMDWS classification and should not be treated as a legal licensure requirement. Registered Nursing illustrates the distinction: New Mexico includes approved associate-degree and bachelor's nursing pathways leading to NCLEX-RN eligibility and RN licensure.

Illustrative occupation	Annual openings	Median wage	Training/education note
Registered Nurses	209	$90,520	Approved nursing program; associate-degree and bachelor's pathways exist; NCLEX-RN/licensure required.
Electricians	85	$59,050	High school plus apprenticeship/occupation-specific training and licensure as applicable.
Welders/Cutters/Brazers	70	$51,200	High school plus technical training/industry credentials.
Industrial Machinery Mechanics	65	$60,770	High school plus technical/OJT pathway.
Computer Systems Analysts	56	$90,940	BLS typical-entry category is bachelor's; related technical/support occupations may have alternate entry routes.
HVAC Mechanics/Installers	34	$49,660	Postsecondary technical training/apprenticeship common.
Medical Records Specialists	22	$51,980	Postsecondary certificate/college-level preparation commonly used.

Source: *NMDWS Northern Workforce Region Occupational Outlook 2025, supplemental projection period to 2033; New Mexico nursing licensure pathway context incorporated in the Board's revised strategy analysis.*

Regional Workforce, Labor Supply, and Barriers

Northern Area labor-supply conditions vary substantially by county. The regional unemployment rate is close to the State average, but labor-force participation, broadband availability, poverty, education, disability, age, language, and travel distance create very different access conditions across the ten counties. These differences matter for service design because a remote training or job opportunity is not practically accessible if a participant lacks transportation, connectivity, prerequisite skills, or the ability to sustain participation.

Indicator	Current evidence	Planning implication
Civilian labor force	217,907 (July 2026)	Large regional labor pool, but county participation varies.
Employed	205,472 (July 2026)	Substantial employment base.
Unemployed	12,435 (July 2026)	Unemployment coexists with vacancies; mismatch is skill/geography/access/job quality, not simply job count.
Northern unemployment rate	5.7%	Slightly above New Mexico (5.6%) and the U.S. (4.4%) in the same snapshot.
Population change 2014-2024	-0.38%	Raises retention, replacement-demand, and labor-force-participation concerns.

Title I Participant Profile

FutureWorks Title I participant data provide the most direct supply-side evidence about the population the workforce system serves. About six in ten participants have a reported employment barrier, and about six in ten enter with a high school diploma/equivalency or no completed education. Most do not enter with a four-year

degree, and more than four in ten are age 45 or older. These findings support short-term, stackable credentials; contextualized basic/digital skills; work-based learning; supportive services; and mid-career transition strategies.

Indicator	Apr.-Sep. 2025	Oct. 2025-Mar. 2026	Planning interpretation
Enrolled participants	2,922	3,005	Enrollment +2.8%; service demand remains substantial.
Participants with barriers	1,744 (59.7%)	1,807 (60.1%)	Barrier resolution must be a core strategy.
HS diploma/equivalency or no completed education	1,744 (59.7%)	1,803 (60.0%)	Foundational skills and stackable credentials are central.
Some postsecondary/technical/associate	692 (23.7%)	795 (26.5%)	Strong pool for mid-skill/work-based pathways.
Bachelor's or higher	486 (16.6%)	407 (13.5%)	Most Title I participants are sub-baccalaureate.
Age 45+	1,312 (44.9%)	1,310 (43.6%)	Mid-career transition/older-worker re-engagement matter.
American Indian/Alaska Native	717 (24.5%)	855 (28.5%)	Tribal coordination and culturally responsive access are significant; race "n/a" is high and limits representation comparisons.

Source: *FutureWorks BI, Who Is Served - Northern Area, PY2025 Title I view used in the Board's strategy analysis.*

Title I Post-Exit Employment and Earnings

For the rolling four-quarter period April 1, 2025 through March 31, 2026, the Title I Outcomes Detail view shows 4,100 employed participants in the second quarter after exit and average Q2 earnings of $9,354.65. These are outcome counts and average earnings, not negotiated performance rates. Sector mix is especially useful for identifying job-quality and advancement opportunities.

Industry after exit	Q2 employed	Share	Avg. Q2 earnings	Strategic signal
Retail Trade	590	14.4%	$6,465	Large placement source; lower earnings.
Health Care & Social Assistance	566	13.8%	$8,600	Large demand sector; strengthen credential ladders/job quality.
Accommodation & Food Services	542	13.2%	$6,212	Entry pathway; advancement/seasonal-to-career needed.
Public Administration	468	11.4%	$11,651	Positive public-sector pathway.
Construction	348	8.5%	$12,123	Strong fit for apprenticeship/OJT and portable credentials.
Professional/Scientific/Technical	184	4.5%	$15,607	High-value opportunity appears underutilized relative to demand.
Educational Services	183	4.5%	$8,503	Large regional sector; strengthen access/pathways.
Information	94	2.3%	$13,401	Small but higher-earning pathway; distinguish IT occupations from industry.
Mining/Oil/Gas	70	1.7%	$13,915	Higher earnings but contraction risk; plan transitions.

Retail Trade and Accommodation/Food Services together account for 27.6 percent of Title I Q2 employed outcomes, with weighted average Q2 earnings of about $6,344, substantially below the overall average. These sectors remain legitimate employment sources, but the Board will distinguish initial labor-market attachment from longer-term career mobility.

Source: *FutureWorks BI, Outcomes Detail - What industries are hiring our participants? Board-confirmed Title I filter, rolling four quarters through March 31, 2026.*

B. Analysis of Workforce Development Activities

1. Strengths

- Employment attachment is a relative strength. PY25 county and funding-source data show generally stronger Q2/Q4 employment than the measures with the largest performance gaps.
- Adult Measurable Skill Gains are strong at 86.71 percent, indicating that effective skill-progression practices exist and can be studied and replicated.
- The region has substantial training capacity in some labor sheds, particularly Santa Fe, San Juan, healthcare, and selected trades; cross-county access can extend that capacity.
- Current Adult/Dislocated Worker monitoring observed meaningful improvement in participant communication, individualized service planning, and documentation under the current provider compared with inherited files.
- The Northern Area has major anchor employers in healthcare, public service, education, professional/technical services, and retail, creating opportunities for sector-based account management and work-based learning.

2. Weaknesses, Capacity Gaps, and Service Risks

Weakness/risk	Current evidence	Local Plan response
Youth performance	MSG 32.47% vs 79%; Credential 35.71% vs 55%.	Monthly milestones, WEX learning objectives, provider/education coordination, supervisor review.
Adult earnings	$6,801 vs $9,500 goal.	Prioritize job quality, higher-value sectors, advancement, and wage tracking.
DW credential conversion	45.45% vs 65%.	Credentialed transition pathways, employer-validated short-term training, follow-up.
ETPL credential conversion	49.59% overall credential vs stronger Q2/Q4 employment and MSG.	Provider-level scorecards, credential responsibility, milestone monitoring, and recruitment of stronger programs.
Training concentration	40.7% of O*NET-coded training in Transportation/Material Moving.	Validate CDL demand county by county and diversify where other demand is stronger.
ETPL geography	Four counties have no local approved program; three more rely on one local provider.	County/labor-shed capacity map, provider recruitment, cohorts, hybrid/online supports and transportation.
Monitoring/data integrity	~48% Adult/DW and ~41% Youth file completeness; recurring eligibility, case-note and payment gaps.	Front-end QA, supervisory review, reconciliation, staff training and follow-up monitoring.
Staffing continuity	Youth vacancies affected San Miguel, Colfax and Mora.	Minimum coverage/caseload escalation and cross-county continuity plan.
Rural access	Low LFP/broadband, long travel, poverty/disability in several counties.	Hybrid service plus in-person/mobile/community access and timely supportive services.

Source: *PY25 Executive Performance Summary; ETPL/O*NET analyses; PY25 Comprehensive Monitoring Report.*

C. Strategic Vision and Goals

NALWDB's strategic vision is to move Northern Area job seekers from labor-market attachment to sustainable career mobility while building an employer-responsive talent pipeline. The Board will measure success not only by whether a participant becomes employed, but also by whether the participant acquires portable skills and credentials, enters work aligned with a documented career pathway, remains employed, and progresses in earnings.

Strategic priority	Problem addressed	Primary strategy	Measures of progress
1. Sector-aligned career pathways	Training/job mismatch and concentration in lower-wage jobs.	Aligning ITAs, IET, apprenticeship, OJT, and other training with LMI, employer demand, credentials, and county access.	Training alignment; completion; MSG; credential; aligned placement; earnings.
2. Employer pipelines and work-based learning	Participants complete services without direct employer bridge.	Sector account plans, OJT, Registered Apprenticeship/pre-apprenticeship, TJT where eligible, Youth WEX, internships and direct recruitment.	Employer conversion, interviews, hires, WBL completion, retention, repeat employer use.
3. Barrier reduction and rural access	Transportation, broadband, childcare, documentation, disability, and geography disrupt participation.	Early barrier assessment; supportive services; community/mobile/hybrid access; co-enrollment.	Days to service, barrier resolution before disruption, training persistence, county service penetration.
4. Economic-transition support	Workers in contracting sectors risk earnings loss and long-term unemployment.	Rapid Response, skills translation, short-term recredentialing, OJT and wage-preservation tracking.	Time to reemployment, credential, new wage vs prior wage, retention.
5. Performance, provider quality and program integrity	Credentials/MSG/earnings and documentation lag employment placement.	Monthly participant milestones, quarterly ETPL/provider scorecards, supervisory QA and monitoring.	MSG/credential timeliness, provider outcomes, file completeness, reconciliation, repeat findings.

D. Alignment of Resources to Achieve the Vision

NALWDB will continue to align WIOA Title I Adult, Dislocated Worker, and Youth services with the other WIOA core programs; Title II Adult Education and Family Literacy, Wagner-Peyser Employment Service, and Vocational Rehabilitation, and with required one-stop partners and other workforce-development programs, including career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended. This coordination will support the Local Plan's goals of expanding access to employment, education, training, supportive services, career pathways, and recognized postsecondary credentials, consistent with 20 CFR §§679.560(a)(6) and 679.560(b)(1)-(2).

Career TEAM and YDI will serve as the primary Title I service providers responsible for implementing this alignment at the participant level. Career TEAM will coordinate Adult and Dislocated Worker services with Wagner-Peyser, Adult Education, Vocational Rehabilitation, Perkins/CTE and postsecondary partners, apprenticeship programs, and other appropriate resources based on the participant's IEP and career goal. YDI will coordinate Youth services with secondary schools, CTE programs, dual-credit opportunities, Adult Education when appropriate, postsecondary institutions, Perkins-supported programs of study, apprenticeship and pre-apprenticeship programs, and employers based on the Youth participant's Objective Assessment and ISS. NALWDB will retain responsibility for system-level policy, partner coordination, performance oversight, and monitoring.

Perkins and CTE Alignment. This modification strengthens coordination with entities carrying out Perkins-supported career and technical education programs. NALWDB will work with local secondary and postsecondary CTE partners to identify programs of study that align with Northern Area LMI, employer demand, ETPL gaps, and county-specific training needs. Particular attention will be given to career pathways in healthcare, construction and skilled trades, education and public service, professional/technical and IT occupations, industrial maintenance, and other sectors supported by current labor-market and employer data. Perkins is specifically intended to strengthen academic, technical, and employability skills and to link secondary and postsecondary CTE with high-skill, high-wage, and in-demand occupations.

NALWDB will continue to develop a county-level inventory of secondary and postsecondary education and CTE resources and compare those resources with ETPL availability and actual workforce demand. Where a college, technical program, CTE pathway, or other education asset exists but is not represented on the ETPL, NALWDB will engage the appropriate institution to determine whether a qualifying program should be considered for State ETPL eligibility. Where a Perkins-supported CTE program already provides an appropriate pathway, Career

TEAM and YDI will use referrals, co-enrollment when allowable, dual credit, ITAs, Work Experience, OJT, pre-apprenticeship, apprenticeship, and other appropriate WIOA services to help participants enter and complete that pathway rather than unnecessarily creating a duplicative service.

For Youth, coordination will emphasize earlier connections between secondary education and postsecondary or occupational training. YDI will work with school districts and CTE partners to identify Youth who can benefit from dual credit, career exploration, technical instruction, industry credentials, Work Experience, pre-apprenticeship, or transition into a postsecondary CTE program. Work-based learning will be connected to the participant's education and career pathway so that employment experience supports measurable skill development and progression toward a credential rather than operating as an isolated activity.

For Adult and Dislocated Worker participants, Career TEAM will use assessments, LMI, prior education and work experience, and the participant's career objective to connect individuals to appropriate CTE, postsecondary, apprenticeship, or other occupational training. This will be particularly important for workers requiring short-term recredentialing, individuals without a four-year degree, workers transitioning from contracting industries, and participants who need stackable credentials that provide entry into employment while preserving opportunities for continued advancement.

NALWDB will also encourage coordination between Perkins/CTE partners and employers so that programs of study reflect current occupational skills, equipment, certifications, licensure requirements, and hiring needs. Employer advisory groups, sector partnerships, work-based learning, internships, OJT, apprenticeship, and other employer-connected strategies will be used appropriately to strengthen the transition from classroom instruction to employment.

Resource Alignment and Avoidance of Duplication. Co-enrollment and braided service strategies will be used when they fill an identified service or funding gap, but each program will retain its own statutory eligibility, allowable-cost, confidentiality, documentation, and performance requirements. Partners will identify which program is responsible for each component of the participant's pathway so that WIOA, Perkins, Adult Education, Vocational Rehabilitation, TANF, and other resources supplement rather than unnecessarily duplicate one another. Existing assessments, education records, and service plans will be used when legally permissible to reduce repetitive testing and intake.

The One-Stop Operator will support partner communication, referral procedures, and cross-training consistently with its coordination role. Required partners, including postsecondary entities carrying out Perkins CTE programs, will participate in the one-stop system consistent with their authorizing statutes and the one-stop MOU requirements of 20 CFR §§678.400–678.420. Required partners must provide access to their programs through the one-stop system and collaborate with the Local Board in maintaining the delivery system.

NALWDB will measure the effectiveness of resource alignment through referral completion, co-enrollment where appropriate, entry into education or training, MSG, credential attainment, completion, employment, earnings, and successful transition between secondary education, postsecondary education, training, and employment. Monitoring will focus on whether participants are connected to the receiving program and progress along the career pathway, rather than relying solely on partner meetings or referral counts.

Local Workforce Development System Structure and Alignment

A. Local Board Area Profile

The Northern Area Local Workforce Development Board serves a geographically expansive and economically diverse ten-county region encompassing Cibola, Colfax, Los Alamos, McKinley, Mora, Rio Arriba, San Juan, San Miguel, Santa Fe, and Taos Counties. The Board's analysis uses a 2024 population estimate of 511,156. The area includes the State capital, major regional employment centers, small cities and towns, frontier and remote communities, Tribal lands and communities, tourism-dependent economies, energy-transition areas, and some of New Mexico's most significant scientific, healthcare, educational, governmental, cultural, and natural-resource employment centers.

The Northern Area does not function as a single labor market. Residents routinely cross county boundaries for employment, education, healthcare, training, and other services, making regional labor-shed coordination an important component of workforce planning. Santa Fe and Los Alamos attract workers from surrounding counties; Farmington serves as a major Four Corners employment and service center; Gallup serves communities throughout McKinley County and neighboring Tribal areas; Española connects Rio Arriba communities to education, healthcare, and the Los Alamos labor market; and Las Vegas provides an education, healthcare, government, and service center for San Miguel and surrounding rural communities. Geography, travel distance, limited public transportation, broadband availability, and the location of training providers therefore influence whether workforce services and employment opportunities are practically accessible to residents.

Labor shed / major community	Planning role
Santa Fe	Diversified job center with healthcare, education/public service, professional/technical services, hospitality and a comparatively broad ETPL base.
Farmington / San Juan County	Four Corners employment center with healthcare, technical/trades, and economic-transition needs; strong local training breadth but single-provider concentration.
Gallup / McKinley County	Tribal-serving commercial/education/healthcare center; local ETPL inventory is heavily concentrated in CDL/industrial pathways.
Los Alamos	High-skill professional/scientific/technical employment center; strategy depends on cross-county talent pipelines because no local approved ETPL program is listed.
Española / Rio Arriba County	Healthcare training strength, bilingual/Tribal communities and a strategic bridge to Los Alamos; local ETPL occupational mix is narrow.
Las Vegas / San Miguel County	Education/public service, healthcare and trades center with relatively broad ETPL access but significant PY25 monitoring/performance issues.
Taos	Tourism/arts economy with healthcare and one-provider ETPL concentration; needs trades/technical diversification and seasonal-to-career progression.
Grants / Cibola, Raton / Colfax, Mora County	Rural access areas where local training capacity is thin or absent, and service delivery must include mobile/community access, transportation, and cross-county solutions.

B. Local Board Structure

The Local Workforce Development Board provides strategic governance, policy direction, oversight, performance accountability, procurement, and coordination with chief elected officials and required partners. Contracted service providers and one-stop partners deliver direct participant services according to their respective responsibilities.

Attachment B provides the current Local Board roster, WIOA representation categories, membership terms, identified vacancies, and the Board's standing committee structure, including committee membership and purposes. The committee structure reflects the Board-approved governance framework that supports fiscal oversight, policy development, youth services, eligible training provider oversight, one-stop system operations, sector strategies, strategic planning, and executive governance.

C. Programs Included in the Workforce Development System

Program/partner	Role in the Northern system
WIOA Title I Adult	Career and training services for eligible adults, including priority for public-assistance recipients, low-income individuals, and individuals who are basic skills deficient for Adult-funded individualized career/training services.
WIOA Title I Dislocated Worker	Reemployment, career services, training, Rapid Response linkage, reskilling, and work-based learning for eligible dislocated workers.

Program/partner	Role in the Northern system
WIOA Title I Youth	Fourteen required program elements for eligible ISY/OSY, with emphasis on education, work experience, career pathways, credentials, MSG, and follow-up.
Wagner-Peyser / Title III	Labor exchange, job search, employer services, LMI, and coordination with Title I and UI through the one-stop system.
Adult Education / Title II	Adult basic education, high-school equivalency, English language acquisition, IET, and transition to postsecondary/training.
Vocational Rehabilitation / Title IV	Vocational rehabilitation, counseling, assistive technology, and disability-related services coordinated through executed agreements.
TANF and other public-assistance partners	Income/work supports case management, and referrals/co-enrollment for eligible families and low-income individuals.
Veterans / JVSG	Priority of service and individualized employment services for eligible veterans, including referral to DVOP services for veterans with significant barriers to employment as appropriate.
SCSEP	Community-service employment and employment support for eligible older workers age 55+.
Rapid Response / UI	Early intervention for layoffs/closures and linkage to UI, reemployment and DW services.
Education/Perkins and postsecondary partners	Career and technical education, industry credentials, articulation, IET and postsecondary pathways.
Other required/community partners	Job Corps, MSFW/NFJP services, Native American programs, community-based organizations, AmeriCorps/YouthBuild and other partners as applicable to the local service network.

D. One-Stop Centers and One-Stop Operator

NALWDB's competitively selected One-Stop Operator is Nina Valdez, who coordinates the Northern Area one-stop delivery system and supports partner coordination across the region's American Job Center. The One-Stop Operator may be contacted at (505) 457-1939 and is based at the Santa Fe American Job Center, 525 Camino de Los Marquez, Suite 200, Santa Fe, New Mexico 87505. The current One-Stop Operator contract period is 1/1/2025 through 6/30/2029.

Attachment C identifies the Northern Area's current one-stop locations, center classifications, addresses, and contact information. The Northern Area includes comprehensive centers in Santa Fe and Farmington and affiliate American Job Centers in Gallup, Las Vegas, Española, Grants, Raton and Taos.

E. Support for the State Plan, Core Programs, and Perkins

NALWDB will continue to support implementation of the New Mexico WIOA State Plan by aligning local workforce strategies with the State's goals for employer responsiveness, career pathways, credential attainment, increased access for individuals with barriers to employment, coordinated service delivery, and data-informed decision-making. This modification strengthens that alignment by connecting State priorities to the specific labor-market, training-capacity, geographic, and participant conditions identified across the Northern Area.

The Board will use regional and county-level labor-market information, employer demand, training-provider capacity and outcomes, participant characteristics, and WIOA performance results to determine where to concentrate local resources. Career pathways will be developed around occupations that demonstrate current or projected demand, provide realistic entry points for WIOA participants, offer opportunities for advancement, and can be supported by accessible education, training, work-based learning, or employer-based instruction. NALWDB will not designate a sector as a workforce priority solely because it is considered economically desirable. Priority strategies will consider the number and quality of available jobs, projected openings, wages and advancement potential, required education and credentials, training accessibility, employer participation, and the likelihood that participants can successfully enter and progress within the occupation.

NALWDB will continue to coordinate Title I services with the other WIOA core programs, Adult Education and Family Literacy, Wagner-Peyser Employment Service, and Vocational Rehabilitation—through the one-stop delivery system. Coordination will focus on reducing unnecessary duplication, improving transitions between programs, and ensuring participants receive the combination of services needed to advance toward employment. Career TEAM and YDI will implement this coordination at the participant level through assessment, referral, co-enrollment when appropriate, career planning, training, supportive services, and follow-up, while each partner program will retain responsibility for its own eligibility, allowable services, confidentiality, funding, and performance requirements.

The One-Stop Operator will support partner communication, referral procedures, cross-training, and service coordination among required partners. NALWDB will establish system expectations and monitor whether coordination results in successful connections to services, rather than evaluating collaboration solely through meetings or referral counts. When a participant is referred to another core or partner program, the local system will emphasize referral completion, identification of the service received, and the participant's continued progress along the documented career pathway.

This modification also strengthens coordination with entities carrying out programs under the Carl D. Perkins Career and Technical Education Act. NALWDB will work with secondary and postsecondary CTE partners, school districts, colleges, Tribal institutions, Adult Education providers, apprenticeship sponsors, and employers to improve connections between career and technical education and the workforce system. Coordination will focus on programs of study that support occupations with demonstrated demand and provide participants with industry-recognized, portable, or stackable credentials and opportunities for continued education or advancement.

NALWDB will also use its county-level education and ETPL analysis to identify where existing CTE or postsecondary programs are not adequately connected to the WIOA system. When an existing program addresses documented employer demand but is not represented on the State ETPL, the Board will work with the institution and NMDWS to determine whether the program may qualify for State ETPL eligibility. Where ETPL inclusion is not necessary or appropriate, Title I providers will identify other allowable referral, co-enrollment, apprenticeship, work-based learning, or partner-funded strategies that connect participants to the training.

Employer engagement will provide an additional link between the State Plan, core programs, and Perkins/CTE. NALWDB will encourage education and workforce partners to use employer input to validate occupational skills, certifications, equipment, curriculum, and work-based learning needs. Employer relationships will be coordinated where practicable so businesses are not repeatedly approached by separate programs for similar purposes and so employer feedback can inform both workforce services and education pathways.

Particular attention will continue to be given to individuals who face barriers to employment, including low-income individuals, individuals who are basic skills deficient, individuals with disabilities, English language learners, veterans, older workers, justice-involved individuals, rural and Tribal residents, and others whose access to training or employment may be affected by transportation, broadband, childcare, distance, language, or other barriers. Core-program and partner resources will be coordinated to address these barriers as early as possible so that supportive services and partner referrals improve training persistence and employment outcomes.

NALWDB will evaluate alignment with the State Plan and partner programs through measurable participant and system outcomes, including successful referral completion, co-enrollment where appropriate, training entry and completion, Measurable Skill Gains, credential attainment, transition to postsecondary education, work-based learning completion, employment, earnings, retention, and employer engagement. Performance and monitoring results will be used to refine coordination strategies throughout the remainder of the Local Plan period.

Through this approach, the Northern Area will support State Plan priorities by maintaining a workforce system in which Title I, the other WIOA core programs, Perkins/CTE, education, and employer resources operate as connected components of a participant's career pathway rather than as separate or duplicative programs.

F. Expanding Access, Career Pathways, and Recognized Credentials

Core partners will use common career-pathway concepts while maintaining program-specific eligibility and service rules. The participant's service plan will identify a target occupation/sector, expected credential or skill milestone, employer connection, expected wage where available, barriers, supportive-service needs, and the next step after training. Adult Education/IET, Title I training, apprenticeship, OJT/TJT, and other services will be sequenced or co-enrolled when doing so creates a practical bridge from basic skills to a recognized credential and employment.

Credential strategy will include mapping the expected credential at enrollment, identifying who is responsible for obtaining source documentation, monitoring exam/licensure milestones, and verifying credentials before activity closure whenever possible. This responds directly to PY25 gaps in Youth and Dislocated Worker credential attainment and the lower credential conversion rate among ETPL participants.

G. Employer Engagement, Economic Development, and Small Business

Employer engagement will be organized around measurable talent pipeline outcomes. NALWDB and one-stop partners will use employer account plans for anchor employers and groups of small employers, document recurring skill and credential requirements, connect employers to recruiting and work-based-learning tools, and use employer feedback to adjust training content and ETPL recruitment. Employer metrics will include interviews, hires, OJT/TJT/WEX/apprenticeship placements, retention, repeat use of workforce services, and wage/job-quality information where available rather than event attendance alone.

NALWDB will coordinate with economic development entities to identify expansions, closures, infrastructure projects, and occupational needs early. Entrepreneurial and microenterprise referrals will be available through appropriate partners; Title I resources will be used only when activities are allowable and consistent with participant service strategies and applicable policy.

H. Cross-System Staff Training

The Board and One-Stop Operator will coordinate regular cross-partner training on program roles, referral procedures, priority of service, accessibility, language access, LMI, partner resources, co-enrollment, data confidentiality, and customer service. Title I provider training will also address eligibility, documentation, activity coding, case-note timeliness, MSG/credential documentation, WEX/OJT/TJT administration, supportive services, payment controls, and current NMDWS system procedures. PY25 monitoring will identify the highest-risk training topics and determine where follow-up technical assistance is required.

One-Stop Delivery System

A. Continuous Improvement of Eligible Providers and One-Stop System Performance

Consistent with 20 CFR § 679.560(b)(5)(i), NALWDB will ensure the continuous improvement of eligible providers and service delivery throughout the one-stop system so that services remain responsive to the employment needs of local employers, workers, and job seekers. The Board will use performance data, participant and employer feedback, monitoring results, labor market information, service-access indicators, partner coordination, and provider outcomes to identify strengths, service gaps, emerging risks, and opportunities for improvement.

The One-Stop Operator will support continuous improvement by coordinating service delivery among required one-stop partners and service providers, facilitating communication among partners and center leadership, identifying operational or service-delivery concerns, supporting consistent referral and customer-service

practices, and bringing system-level issues to the Board for review and action. The One-Stop Operator's role will remain consistent with the scope established through the competitive procurement and with the limitations and conflict-of-interest requirements applicable to one-stop operators.

NALWDB will evaluate the effectiveness of the one-stop delivery system using measures that include access to services; referral completion; partner coordination; customer experience; employer engagement; service timeliness; accessibility; language access; participant employment, credential, measurable skill gain, and earnings outcomes; and findings identified through monitoring or other oversight activities. NALWDB will address identified deficiencies or performance concerns through technical assistance, corrective action, staff or partner training, process improvement, follow-up monitoring, or other appropriate Board action.

For eligible training providers, NALWDB will manage the Eligible Training Provider List (ETPL) as both an informed-customer-choice resource and a strategic workforce investment tool. Local review will consider labor-market alignment, geographic access, program completion, measurable skill gains, credential attainment, Q2 and Q4 employment, earnings, cost, program duration, participant experience, accessibility, and recurring monitoring or performance concerns. State initial and continued ETPL eligibility determinations remain governed by NMDWS policy; local review will inform participant referrals, technical assistance, provider recruitment, and recommendations to the Board and NMDWS within that framework.

NALWDB's current ETPL policy is included in Attachment A of this Local Plan Modification.

Frequency	ETPL / provider action
Monthly	Review active participant/provider progress, attendance, MSG/credential milestones, extensions, invoices/payment status, and unresolved barriers.
Quarterly	Provider scorecard: enrollment, completion, MSG, credential, Q2/Q4 employment, earnings, duration, cost, participant issues, findings, and LMI alignment.
Semiannual	Refresh county/sector approved-program matrix and O*NET utilization; identify zero-provider/single-provider counties, overconcentration, and recruitment needs.
State eligibility cycle	Support NMDWS continued eligibility with accurate performance/cost information and local recommendations consistent with State policy.
As needed	Technical assistance, corrective action, referral-practice adjustment, provider recruitment, and escalation when risk is significant.

B. ETPL Capacity and Training Gaps

128 approved programs were physically located within the ten Northern counties, representing 13 distinct providers. Location is an access indicator, not a restriction on informed customer choice: participants may use eligible online or cross-county programs, but a distant or online option may not be practically accessible when broadband, transportation, clinical/lab requirements, disability, or schedule barriers exist.

County	Unique local approved programs	Distinct local providers	Primary capacity signal
Cibola	0	0	No in-county approved program; access gap.
Colfax	0	0	No in-county approved program; rural travel gap.
Los Alamos	0	0	No local program despite strong technical demand; build labor-shed pipelines.
McKinley	12	3	9 transportation/CDL + 3 industrial/trades; major diversification gap.
Mora	0	0	No local program; online-only solution is insufficient.
Rio Arriba	4	1	All healthcare; strong health base but occupational/provider concentration.

County	Unique local approved programs	Distinct local providers	Primary capacity signal
San Juan	34	1	Broad portfolio, but single-provider concentration.
San Miguel	21	2	Broad access; quality/oversight as important as quantity.
Santa Fe	37	5	Largest/diversified base; deeper in healthcare/personal services than education/trades.
Taos	20	1	Broad but shallow one-provider portfolio; trades/technical depth limited.

Regional training utilization is also concentrated. In the O*NET-coded rolling-four-quarter training view, Transportation/Material Moving represented 48 of 118 enrollments (40.7 percent), while Education/Training/Library and Office/Administrative Support recorded zero. The Board will therefore validate CDL demand and provider outcomes before expanding transportation training and will actively examine underutilized or unavailable healthcare, technical, education, construction/maintenance, business-support, and public-service pathways where LMI and employer evidence support them.

C. Access in Remote and Rural Areas

NALWDB will use a hybrid access model that combines one-stop/affiliate locations, community partner sites, mobile or scheduled in-person service, telephone/video service, online tools, and transportation/technology supports. Virtual access will not be treated as a complete substitute for service in counties with low broadband, long travel distances, device/digital-literacy barriers, or training that requires laboratories, clinicals, worksites, or hands-on instruction. Service coverage and training travel requirements will be monitored by county.

D. Nondiscrimination, Disability Access, and Programmatic Accessibility

All one-stop entities will comply with WIOA §188, 29 CFR Part 38, and applicable ADA requirements. NALWDB will use one-stop certification/accessibility review, complaint procedures, reasonable accommodations, accessible technology/materials, and staff training to identify and correct physical and programmatic barriers.

E. Language Access and English Language Learners

The one-stop system will provide free and timely language assistance to individuals with limited English proficiency, including qualified interpretation, translated vital information as required, Babel notices, notice of the availability of free language assistance, accessible electronic information, and procedures that do not require participants to provide their own interpreter. Language access will be integrated with outreach to multilingual communities and with Adult Education/English language acquisition and IET referrals. Staff will be trained on how to obtain language assistance and document service delivery consistent with 29 CFR §38.9 and the Board's Language Access Plan.

Service Implementation for Indicated Populations

A. Youth

NALWDB will provide the fourteen WIOA Youth program elements through the Youth provider and partner network based on each participant's objective assessment and Individual Service Strategy (ISS). Eligibility will distinguish Out-of-School Youth ages 16-24 from In-School Youth ages 14-21 at enrollment, subject to applicable disability provisions. Services will be individualized for youth with disabilities, homeless/runaway youth, foster/former foster youth, pregnant/parenting youth, justice-involved youth, low-income youth, English language learners and other eligible youth with barriers.

The Youth strategy is both a performance-recovery strategy and an access strategy. PY25 Youth MSG was 32.47 percent against 79 percent, and Credential Attainment was 35.71 percent against 55 percent. NALWDB will require monthly review of MSG eligibility and evidence, credential mapping at enrollment, stronger

school/provider/employer documentation, complete learning plans for Work Experience, timely employer evaluations, contemporaneous case notes, supervisory review before activities close, and follow-up monitoring of high-risk counties and files.

Youth Work Experience, OSY Expenditure, Registered Apprenticeship and Outreach Strategy

NALWDB will oversee Youth service delivery to ensure that the local area meets the WIOA requirement to expend at least 20 percent of local Youth formula funds on paid and unpaid Work Experience activities and at least 75 percent of local Youth formula funds on Out-of-School Youth (OSY). The Board will monitor program and fiscal performance throughout the program year and will require its contracted Youth service provider, Youth Development, Inc. (YDI), to implement additional service, outreach, and work-based learning strategies when expenditure, enrollment, participation, or performance trends indicate that corrective action is necessary.

Work Experience will be implemented as a structured career-development activity rather than solely as subsidized employment. YDI will develop and manage appropriate Work Experience opportunities and ensure each placement is connected to the participant's Individual Service Strategy (ISS), career goals, and identified skill needs. Required documentation will include, as applicable, an individualized learning plan, occupational and employability skill objectives, worksite and supervisor information, authorized hours and wages, timesheets, participant progress documentation, employer evaluations, payment support, and a documented transition to continued education, occupational training, apprenticeship, credential attainment, or unsubsidized employment.

The Board's approach to achieving the 20 percent Work Experience requirement will focus on addressing service gaps identified through PY25 performance, monitoring, labor-market, and training-capacity analysis. NALWDB will monitor YDI's Work Experience pipeline, expenditures, geographic distribution of placements, participant progression, employer participation, Measurable Skill Gains, credential outcomes, and documentation quality. When the pace of Work Experience participation or expenditures is insufficient, YDI will be expected to implement additional strategies appropriate to the affected counties and participant populations.

Registered Apprenticeship and pre-apprenticeship will be used as career pathway service strategies when appropriate to the participant and available within or accessible from the participant's labor shed. YDI may connect Youth to Registered Apprenticeship sponsors, pre-apprenticeship programs, unions, employers, education partners, and other apprenticeship-related opportunities when those pathways align with the participant's ISS and local or regional employer demand. The emphasis will be on creating a progression from Work Experience or career exploration into structured occupational training, recognized credentials, progressive skill development, and sustainable employment rather than treating apprenticeship as a separate or universally appropriate Youth service.

NALWDB will also monitor YDI's OSY enrollment and expenditures throughout the program year to ensure progress toward the 75 percent OSY minimum. Outreach strategies will therefore place greater emphasis on locating and engaging youth disconnected from education and employment, rather than relying primarily on school-based or general program outreach. YDI will use community-based, partner-based, and county-responsive outreach approaches to reach potentially eligible OSY and connect them to assessment, career planning, Work Experience, training, supportive services, and other appropriate Youth program elements.

The Local Plan analysis identifies several geographic and service-delivery gaps that will guide YDI's outreach and service strategies. In Cibola and McKinley Counties, outreach should emphasize Tribal and community partnerships, in-person access, and barrier reduction because of low labor-force participation, poverty, limited broadband, and training-access constraints. Cibola also has no locally located ETPL provider, while McKinley's available training is heavily concentrated in transportation and industrial pathways. In Colfax and Mora Counties, limited or absent local training capacity, rural distance, prior case-management vacancies, and

Youth monitoring concerns require stronger participant contact, continuity of case management, Work Experience development, and supported cross-county access.

In Los Alamos County, the strategy will rely primarily on cross-county pipelines because local Youth cohorts are small and no approved training provider is physically located in the county despite strong technical, scientific, skilled-trade, and professional employment demand. YDI should use career exploration, internships, Work Experience, pre-apprenticeship or apprenticeship connections, and referrals to help eligible Youth from surrounding counties access these opportunities when appropriate.

In Rio Arriba County, outreach and service delivery should account for bilingual and Tribal communities, transportation and commuting barriers, and limited local training choice. Work Experience and career-pathway development should complement the county's existing healthcare training strength while helping Youth access construction, maintenance, technical, public-service, and other pathways available through neighboring labor sheds.

In San Juan County, YDI's strategy will place particular emphasis on Youth Measurable Skill Gain development and documentation because PY25 Youth MSG performance was 0 of 6, while monitoring also identified Youth eligibility, Work Experience, and activity-coding concerns. In San Miguel County, the priority will be improving Youth credential and MSG outcomes while strengthening case-management continuity, milestone documentation, and connections between training, supportive services, and employers.
In Santa Fe County, YDI will focus on Youth engagement, Work Experience quality, and conversion of participation into measurable outcomes. PY25 Youth MSG was 0 of 8, and Youth Credential Attainment was 25 percent, while monitoring identified significant case-management, eligibility, Work Experience, and payment-documentation weaknesses. Santa Fe's broader employer and training base provides an opportunity to expand Youth exposure to technical, public-service, skilled-trade, healthcare, and other career pathways when those opportunities align with participant goals and employer demand.

In Taos County, the service strategy will prioritize sustained Youth engagement, follow-up, Work Experience, Measurable Skill Gains, credential completion, and transition to employment because PY25 Youth employment, credential, and MSG results were weak, and monitoring identified recurring assessment, ISS, case-note, follow-up, payment, and activity-closure concerns. YDI should also use Work Experience and employer connections to broaden exposure beyond the county's concentrated healthcare and hospitality training base into skilled trades, maintenance, technical, digital, and other locally validated pathways.

NALWDB will evaluate implementation through regular review of Youth expenditures, OSY enrollment and expenditure rates, Work Experience participation and completion, county service penetration, participant contact and retention, employer participation, MSG and credential attainment, transition to education or employment, and monitoring findings. Where results indicate that a county or population is not being adequately reached or served, the Board will require YDI to submit and implement targeted corrective or service-improvement strategies and will evaluate progress through subsequent programmatic and fiscal monitoring.

B. Adults and Dislocated Workers

NALWDB will ensure that eligible Adult and Dislocated Worker participants have access to the range of career and training services authorized under WIOA through the Northern Area one-stop delivery system and its contracted Adult and Dislocated Worker service provider, Career TEAM. NALWDB will establish program policy, service expectations, priority requirements, performance standards, and monitoring requirements, while Career TEAM will develop and implement individualized service strategies that respond to participant needs, community conditions, current labor market information, employer demand, and in-demand occupations within the ten-county Northern Area.

Adult and Dislocated Worker services available through the local workforce system include eligibility determination and intake; outreach and orientation; labor-market, career, and training information; initial and

comprehensive assessments; development of Individual Employment Plans; individualized career planning and counseling; job-search and placement assistance; supportive-service coordination; training services; work-based learning; employer-connected services; and follow-up services, as appropriate. Training strategies may include Individual Training Accounts, occupational skills training, On-the-Job Training, customized training, incumbent worker training when applicable, workplace training combined with related instruction, skills upgrading and retraining, apprenticeship-related pathways, and Transitional Jobs for individuals who meet the specific eligibility and work-history requirements for that service.

Services will be individualized rather than driven solely by program availability. Career TEAM will use assessment results, prior education and work history, transferable skills, employment barriers, participant career goals, expected wages, current and projected occupational demand, available training capacity, and employer requirements to determine the appropriate service strategy. Training will be directed toward employment opportunities in the local area, regional labor shed, or another area to which the participant is willing and reasonably able to commute or relocate, consistent with WIOA requirements and informed customer choice.

Adult and Dislocated Worker training opportunities vary considerably across the Northern Area. Cibola, Colfax, Mora, and Los Alamos Counties currently have no approved training programs physically located within the county, creating greater reliance on cross-county training, employer-based learning, hybrid delivery, transportation assistance, and other access strategies. McKinley County has local training capacity, but it is heavily concentrated in transportation/CDL and industrial pathways. Rio Arriba County has a strong healthcare base but limited occupational and provider diversity. San Juan County offers broad training capacity but is highly concentrated within a single provider, while Taos also has a one-provider concentration with limited depth in skilled trades and technical programs. San Miguel and Santa Fe have comparatively broader training availability, but the Local Plan analysis shows a continued need for stronger provider quality, participant progression, credential completion, and alignment of training investments with higher-wage, in-demand employment.

Career TEAM will therefore develop county- and participant-responsive strategies rather than applying a uniform service model across the ten counties. In communities with limited local training capacity or significant transportation and broadband barriers, strategies may include supported cross-county enrollment, employer-based training, OJT, apprenticeship connections, cohort-based or hybrid training when practical, partner referrals, transportation assistance, and coordinated access through one-stop and community resources. In counties with broader training capacity, Career TEAM will emphasize training quality, participant progression, credential attainment, employer connection, and selection of pathways that provide opportunities for sustainable wages and advancement.

The county and regional labor-market analysis will guide, but not replace, individualized career planning. Priority occupational pathways identified through the Local Plan include healthcare and social assistance; construction, infrastructure, maintenance, and skilled trades; education and public service; professional, scientific, technical, and information-related occupations; business, administrative, procurement, and project-support occupations; and other locally validated sectors with demonstrated employer demand. Hospitality, tourism, arts, and related occupations remain important in portions of the Northern Area, particularly Santa Fe, Taos, and Colfax, but WIOA-funded training in these sectors will be evaluated for opportunities for advancement, transferable skills, year-round employment, recognized credentials, and improved earnings rather than entry-level placement alone.

For the Adult program, the Board will monitor the emphasis on moving participants from employment attachment toward economic self-sufficiency and wage progression. Current performance analysis indicates that Adult employment outcomes are comparatively strong while earnings and credential outcomes warrant continued attention. Career TEAM will therefore incorporate expected wages, advancement opportunities, credential value, employer demand, and the participant's long-term career pathway into training and employment decisions rather than measuring success solely through initial job placement.

For Dislocated Workers, Career TEAM will emphasize timely reemployment, skills translation, recredentialing, and transition into occupations that offer wages comparable to or higher than prior employment when reasonably attainable. Service strategies will be responsive to layoffs, business closures, industry contraction, and economic transitions affecting the Northern Area, including workers transitioning from energy, extraction, utilities, and other changing industries. OJT, employer-linked training, short-term credentialing, and other appropriate training strategies may be used to shorten the transition into new occupations. The Board will monitor credential attainment, time to reemployment, post-training employment, earnings, and retention in addition to initial placement.

Adult and Dislocated Worker services will also be responsive to individuals with barriers to employment, including displaced homemakers, individuals experiencing homelessness, justice-involved individuals, single parents and pregnant women, long-term unemployed individuals, low-income individuals, individuals who are basic skills deficient, veterans and eligible spouses, individuals with disabilities, individuals with limited English proficiency, older workers, and other eligible individuals whose circumstances create barriers to education, training, or employment. Career TEAM will identify barriers during assessment and career planning and coordinate allowable supportive services, partner referrals, co-enrollment, accommodations, language assistance, transportation, and other resources when needed to support participation and successful completion of services.

For individualized career services and training services funded through the WIOA Adult program, NALWDB will apply the statutory priority required by WIOA §134(c)(3)(E) and 20 CFR §680.600 to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient, after application of veterans' and eligible spouses' priority of service as required. Priority of service determines the order in which eligible individuals receive Adult-funded individualized career and training services; it does not alter WIOA eligibility requirements and will not be represented as automatically applying to programs administered by one-stop partners that operate under separate statutory eligibility or priority requirements.

NALWDB will monitor Career TEAM's implementation through participant and fiscal reviews, county-level service and training patterns, eligibility and priority-of-service compliance, completion and credential attainment, Measurable Skill Gains where applicable, Q2 and Q4 employment, earnings, training-provider outcomes, supportive-service utilization, employer engagement, documentation quality, and participant progression. Where monitoring, performance data, LMI, or changes in community conditions identify a service gap, NALWDB will require Career TEAM to develop and implement appropriate service-improvement strategies and will evaluate their effectiveness through subsequent monitoring and performance review.

C. Transitional Jobs, OJT, and Other Work-Based Learning

NALWDB will provide policy direction and oversight for Transitional Jobs (TJT), On-the-Job Training (OJT), and other allowable work-based learning activities. Career TEAM and YDI will implement these strategies within their respective WIOA programs based on participant eligibility and assessment, individual career goals, county-level labor market information, current and projected employer demand, in-demand occupations, training availability, and identified growing or contracting sectors.

YDI, as the contracted Youth service provider, may use OJT, Work Experience, pre-apprenticeship, Registered Apprenticeship connections, and other allowable work-based learning strategies when appropriate to the Youth participant’s Individual Service Strategy (ISS), career goals, skill-development needs, and local employment opportunities.

Work-based learning will target the economic and workforce conditions identified in the Local Plan. Regional LMI shows continued demand in healthcare and social assistance, construction and skilled trades, education and public service, professional/scientific/technical occupations, and selected business and technical support occupations. Construction and skilled trades, for example, support apprenticeship and OJT strategies and have shown comparatively strong Title I earnings, while professional/scientific/technical occupations represent a higher-wage sector that remains underrepresented in current Title I placements.

County conditions will further guide implementation. In McKinley County, where local training is concentrated in transportation and industrial programs despite significant demand in healthcare, education, and public service, Career TEAM and YDI should use work-based learning to broaden participant access to those underrepresented pathways. In Los Alamos and surrounding counties, OJT, internships, and apprenticeship connections can build cross-county pipelines into technical, IT/cyber, laboratory-support, skilled-trade, procurement, and project-support occupations. In Mora, Cibola, and Colfax Counties, where local training capacity is limited or absent, employer-based learning and cross-county opportunities can help address gaps in healthcare, construction, maintenance, public-service, and technical pathways.

In San Juan County, work-based learning strategies will also support economic transition. Although recent employment growth has been positive, regional projections show contraction in mining, oil and gas, and utilities. Career TEAM will therefore emphasize Rapid Response, transferable-skill assessment, short-term recredentialing, OJT, and other employer-based strategies that help affected workers transition into construction, industrial maintenance, technical, healthcare, and public-service occupations while preserving earnings where possible.

Career TEAM and YDI will document the relationship between the selected work-based learning activity and the participant's assessment, target occupation, employer or sector demand, expected wage, required skills or credentials, and next career step. Service providers will also document employer/worksite suitability, wage and reimbursement terms, training or learning objectives, duration, supportive service needs, and required payment records.

NALWDB will monitor both service providers to determine whether work-based learning investments are aligned with current LMI, county and regional demand, participant needs, and employment outcomes. Monitoring will include eligibility, employer agreements, learning plans, timesheets, payments, completion, credential or skill attainment, transition to employment, wages, and whether the activity resulted in progress toward an in-demand occupation or viable career pathway.

Source: *20 CFR §§680.190-195 and §680.700; PY25 monitoring findings incorporated into the Board's strategy.*

D. Individuals with Disabilities

NALWDB will provide oversight to ensure that individuals with disabilities have equal access to WIOA Title I and one-stop services consistent with WIOA Section 188, 29 CFR Part 38, applicable accessibility requirements, and Board policy.

Career TEAM and YDI, within their respective Adult, Dislocated Worker, and Youth programs, will assess individual service needs and coordinate referrals and co-enrollment with the New Mexico Division of Vocational Rehabilitation, the New Mexico Commission for the Blind, and other appropriate partners. Services may include reasonable accommodations, assistive technology, accessible career and training services, job coaching and counseling, work-based learning, supportive services, and other disability-related assistance necessary to support participation and employment.

Service strategies will be individualized based on the participant's abilities, employment goals, identified barriers, local labor-market information, and available in-demand career pathways. NALWDB will monitor service-provider compliance, accessibility, documentation, referral coordination, and participant outcomes. Partner responsibilities, information sharing, and confidentiality will be governed by applicable law, Board policy, and executed agreements.

E. Veterans

NALWDB will provide oversight to ensure that veterans and eligible spouses receive priority of service in qualified job training programs consistent with applicable federal requirements. Contracted service providers and one-stop partners will identify veterans and eligible spouses at the point of entry, explain priority-of-service

requirements, document applicable status, and ensure that priority is applied throughout the service-delivery process.

Career TEAM and YDI, when applicable to an eligible Youth participant, will coordinate with one-stop partners and Jobs for Veterans State Grants (JVSG) staff to refer veterans who meet applicable criteria for Disabled Veterans' Outreach Program (DVOP) services or other specialized veteran services. Veterans and eligible spouses may also receive WIOA Title I services when independently eligible.

For Adult-funded individualized career and training services, service providers will apply veterans' and eligible spouses' priority of service in conjunction with the WIOA Adult statutory priority for recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient, in the order required by applicable federal and State guidance.

NALWDB will monitor implementation through programmatic monitoring, participant-file review, and review of service-provider procedures to ensure that priority-of-service requirements are consistently applied and appropriately documented.

F. Migrant and Seasonal Farmworkers

NALWDB will provide oversight and ensure that its contracted service providers and one-stop partners coordinate with NMDWS Migrant and Seasonal Farmworker (MSFW) outreach staff, the National Farmworker Jobs Program (NFJP), and other designated providers serving the Northern Area.

Career TEAM and YDI, as applicable to the participant population, will provide or coordinate access to employment, education, training, supportive services, language assistance, and other one-stop services for eligible migrant and seasonal farm workers. Outreach and referral strategies will reflect seasonal employment patterns, agricultural activity, geographic location, language-access needs, and transportation or other barriers that may affect access to workforce services.

NALWDB will monitor service-provider coordination and referral activity to help ensure that eligible MSFW participants are connected to appropriate WIOA and partner services.

G. Native Americans

Native American communities represent a significant share of the Northern Area population and WIOA service population. American Indian/Alaska Native residents comprise approximately 80.6 percent of McKinley County, 48.0 percent of Cibola County, and 44.0 percent of San Juan County. In addition, 28.5 percent of the most recent Title I participant population self-identified as American Indian/Alaska Native.

The data also identify significant access and economic barriers. McKinley County has a 26.2 percent poverty rate, 48.3 percent labor-force participation, and 64.8 percent household broadband access. Cibola County has a 25.9 percent poverty rate and 43.7 percent labor-force participation. In San Juan County, household broadband access is 72.4 percent and labor-force participation is 53.0 percent. These conditions support continued emphasis on Tribal and community-based outreach, transportation and digital-access assistance, and connections to locally and regionally in-demand training and employment.

NALWDB currently identifies MOUs with Eight Northern Pueblos, the Jicarilla Apache Nation, the Pueblo of Acoma, and Santa Clara Pueblo. NALWDB will use these and other Tribal workforce partnerships, including WIOA Section 166 programs, to strengthen referrals, co-enrollment where appropriate, culturally responsive services, and access to training, work-based learning, and employment opportunities.

Source: U.S. Census Bureau QuickFacts 2020–2024; NMDWS labor-market data; FutureWorks Title I participant data.

H. Individuals with Low Income and TANF Participants/Exhaustees

As part of the Plan Modification, NALWDB will continue to ensure that low-income individuals and recipients of public assistance have meaningful access to WIOA services throughout the ten-county Northern Area. For Adult-funded individualized career and training services, priority will be provided to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient in accordance with WIOA § 134(c)(3)(E), 20 CFR § 680.600, applicable NMDWS requirements, and NALWDB policy, following veterans' priority of service as required.

Career TEAM will implement Adult and Dislocated Worker outreach and service strategies, and YDI will address eligible Youth populations, based on participant needs and county conditions. Service strategies will consider poverty, labor-force participation, unemployment, educational attainment, transportation, broadband access, disability, language and cultural needs, training availability, and current and projected labor-market demand. Services may include career and training services, basic and digital skills development, work-based learning, supportive services when allowable and necessary, co-enrollment, and referrals to partner programs.

County strategies will reflect the conditions identified in the Local Plan:

Cibola and McKinley Counties will receive heightened outreach and barrier-reduction efforts. Poverty is 25.9 percent in Cibola and 26.2 percent in McKinley, while labor-force participation is only 43.7 percent and 48.3 percent, respectively. McKinley also has only 64.8 percent household broadband access. Strategies will emphasize Tribal/community partnerships, in-person access, transportation and digital support, foundational skills, and pathways into healthcare, construction, education/public service, and technical occupations rather than relying solely on existing training availability.

San Miguel County, with poverty at 26.0 percent and labor-force participation at 50.6 percent, will emphasize early identification of financial and participation barriers, supportive services, career-connected training, and direct employer connections in healthcare, education/public service, construction, and administrative occupations.

Mora and Colfax Counties will require rural-access strategies. Labor-force participation is 46.0 percent in Mora and 48.0 percent in Colfax, and neither county currently has an approved training provider physically located within the county. Career TEAM and partners will use community-based access, supported cross-county training, transportation assistance, work-based learning, and employer connections to reduce the effect of distance and limited training availability.

Rio Arriba and San Juan Counties will combine low-income outreach with digital, transportation, and career-pathway strategies. Rio Arriba has 17.1 percent poverty and 75.3 percent broadband access, while San Juan has 18.2 percent poverty and 72.4 percent broadband access. Rio Arriba strategies will address limited training diversity and access to neighboring employment centers. San Juan strategies will also address economic transition by helping workers move from contracting energy-related sectors into healthcare, construction, industrial maintenance, technical, and public-service occupations.

Taos County, with poverty at 17.2 percent, will emphasize progression from seasonal or lower-wage employment into year-round, credentialed, or higher-wage opportunities in healthcare, skilled trades, technical occupations, and advancement-oriented hospitality pathways.

Santa Fe County has a lower overall poverty rate of 10.9 percent but includes low-income and underemployed residents facing childcare, transportation, scheduling, and cost-of-living barriers. Services will emphasize advancement from lower-wage employment into healthcare, public-sector, professional/technical, skilled-trade, and supervisory career pathways.

Los Alamos County has comparatively low poverty and high labor-force participation; therefore, the primary strategy will be to create cross-county access for eligible low-income residents of surrounding communities to

the county's high-wage technical, laboratory-support, skilled-trade, project-support, and administrative employment opportunities.

Career TEAM, YDI, the one-stop operator, and required partners will coordinate referrals with TANF and other public-assistance programs consistent with applicable MOUs, program eligibility requirements, and confidentiality requirements. Participants approaching or exhausting TANF eligibility may be connected to WIOA Title I career and training services, Adult Education, Wagner-Peyser, work-based learning, supportive services, and other partner resources when independently eligible for those services.

NALWDB will monitor implementation through Adult priority-of-service reviews, participant-file monitoring, county service patterns, referral completion, supportive-service utilization, training and work-based learning participation, credential attainment, employment, and earnings. Referrals will be evaluated based on successful connection to the receiving program or service rather than referral issuance alone, and service-provider strategies will be adjusted when data identify underserved counties, populations, or barriers to participation.

I. Older Individuals

NALWDB will oversee coordination of services for older workers through Career TEAM, Wagner-Peyser, SCSEP, and other one-stop partners. Career TEAM will assess eligible Adult and Dislocated Worker participants and connect older individuals to career services, skills assessment, digital-literacy assistance, occupational training, work-based learning, job search, supportive services when allowable, and employer opportunities based on individual needs and local labor-market demand.

This strategy is particularly important in Colfax County, where 30.7 percent of the population is age 65 or older and labor-force participation is 48.0 percent. Colfax also has no approved training provider physically located within the county, increasing the importance of accessible services, cross-county training, transportation support, and employer-based learning.

Career TEAM and one-stop partners will also identify older workers in other rural counties who may face barriers related to transportation, digital access, disability, changing skill requirements, or displacement from declining industries. Services will focus on retaining or re-engaging older workers through healthcare and home care, skilled trades and maintenance, public service, administrative, remote work, and other locally in-demand occupations where the participant's skills and interests align with employer demand.

Eligible individuals age 55 and older who may benefit from SCSEP will be referred to the appropriate SCSEP provider for subsidized community-service employment and related services. NALWDB will monitor referral coordination and service access to help ensure that older individuals are connected to appropriate workforce and partner resources.

J. Individuals with Low Literacy Levels / Adult Education and Title II Review

NALWDB will oversee coordination between WIOA Title I and Title II Adult Education partners to ensure that participants with basic-skills, literacy, English-language, or educational-attainment needs can access appropriate education and workforce services. Career TEAM will assess Adult and Dislocated Worker participants for basic skills and educational needs and coordinate referrals or co-enrollment with Adult Education providers when appropriate. YDI will coordinate comparable education and skill-development services for eligible Youth consistent with Youth program requirements.

Services may include adult basic education, high-school equivalency preparation, English language acquisition, Integrated Education and Training (IET), digital literacy, career navigation, occupational training, and transition to postsecondary education or employment. Cross-training, co-enrollment, and coordinated case planning will be used when they improve continuity of services and reduce duplication.

This strategy is supported by the Title I participant profile, which shows that approximately 60 percent of recent Title I participants entered with a high-school diploma/equivalency or no completed education level, indicating a continued need for foundational skills, short-term credentials, and career-connected education.

County conditions will also guide service delivery. McKinley County has lower educational attainment, with 81.8 percent of residents age 25 and older having completed high school and only 13.3 percent holding a bachelor's degree or higher. Cibola County has an 84.7 percent high-school completion rate and 17.0 percent bachelor's attainment, while Rio Arriba and San Juan Counties also have comparatively lower bachelor's attainment at 19.0 percent and 18.3 percent, respectively. These counties will receive particular attention to foundational skills, digital literacy, contextualized education, stackable credentials, and training pathways that do not require a four-year degree.
Career TEAM, YDI, Adult Education providers, and one-stop partners will align education services with current labor-market demand so that basic-skills remediation is connected to a defined career pathway rather than provided as a stand-alone service. Priority pathways may include healthcare, construction and skilled trades, education and public service, administrative and technical occupations, and other locally in-demand sectors identified through county and regional LMI.

NALWDB will monitor referral and co-enrollment practices, service access, educational and training progress, Measurable Skill Gains, credential attainment, and transition to postsecondary education or employment to determine whether Title I and Title II coordination is resulting in meaningful participant progression.

Sources: WIOA §§ 107(d)(11), 108, and 232; 20 CFR § 679.370(n); New Mexico WIOA State Plan PY 2024–2027; FutureWorks Title I participant data, NMDWS labor-market data; U.S. Census Bureau QuickFacts, 2020–2024.

Title II Local Application Review Process

Consistent with WIOA §§107(d)(11) and 232, NALWDB will review local Title II applications for consistency with the Local Plan. The review process will: (1) receive the applications and State review instructions/timeline; (2) distribute applications to designated Board staff/committee members without conflicts of interest; (3) compare proposed services with Local Plan priorities, one-stop coordination, target populations, career pathways and local need; (4) document comments using the State-required format; (5) approve/transmit Board comments to the State within the required timeline; and (6) retain the review record. Reviewers with an organizational or financial conflict will recuse themselves from the affected application.

VI. Coordination of Services Across Programs

A. Wagner-Peyser and Unemployment Insurance

Consistent with WIOA §108(b)(12) and 20 CFR §679.560(b)(11), NALWDB will ensure coordinated delivery of Wagner-Peyser Employment Service (ES), WIOA Title I, Unemployment Insurance (UI), and other required one-stop partner services through the American Job Center system. Wagner-Peyser services will be provided in accordance with the staffing model established by NMDWS and applicable federal requirements. NMDWS will retain responsibility for Wagner-Peyser Employment Service and UI functions, while Career TEAM will provide Adult and Dislocated Worker services within its contracted Title I scope.

Coordination will focus on reducing repetitive intake and assessment, strengthening referrals and co-enrollment, improving partner knowledge of available services, and ensuring that customers are connected to the appropriate program regardless of their initial point of entry. The One-Stop Operator will support common referral procedures, partner communication, and cross-training. Existing participant information and assessments will be used when legally permissible and appropriate, while program-specific eligibility, funding, confidentiality, documentation, and reporting requirements will remain separate. Referral effectiveness will be measured by successful connection to services rather than referral issuance alone. These strategies are consistent with the one-stop MOU requirements at 20 CFR §678.500, including coordinated service delivery and methods for referring individuals between partners.

In accordance with 20 CFR §679.560(b)(3)(iv), Wagner-Peyser and UI coordination will emphasize rapid reemployment. UI claimants will have access to meaningful assistance with unemployment compensation claims as required by 20 CFR §678.430(a)(10) and will be connected to appropriate Wagner-Peyser reemployment and labor-exchange services. NMDWS will retain responsibility for UI eligibility determinations, adjudication, work-test requirements, and other functions reserved to the State. Career TEAM will screen potentially eligible individuals for Dislocated Worker services and, when appropriate, provide career planning, training, recredentialing, OJT, supportive services, and other reemployment assistance. Wagner-Peyser reemployment services and referrals to WIOA training and education resources will be coordinated consistent with 20 CFR §§652.201 and 652.209.

UI claimants referred through RESEA, Rapid Response, or other reemployment initiatives will be connected to labor-market information, job-search and placement assistance, career planning, and training opportunities based on individual needs and current LMI. Particular attention will be given to workers affected by layoffs or contraction in industries identified through Northern Area labor-market analysis, including energy, extraction, and utilities, with an emphasis on transferable skills and transition into growing and in-demand occupations.

Employer services will also be coordinated to minimize duplicate outreach. NMDWS ES staff, Career TEAM, and other workforce partners will coordinate job orders, recruitment activities, employer needs, and labor-market information, while Title I resources such as OJT, apprenticeship, work-based learning, customized training, and incumbent worker strategies will be used when allowable and appropriate.

NALWDB will monitor coordination through the one-stop MOU, One-Stop Operator performance, referral completion, co-enrollment, service access and timeliness, employer engagement, and participant employment outcomes. WDB will address identified duplication, referral breakdowns, or service gaps through partner coordination, technical assistance, cross-training, or procedure revisions.

B. Rapid Response and Dislocated Worker Transition

NALWDB will continue to coordinate with the NMDWS Rapid Response Unit for WARN and non-WARN layoffs, closures, and other dislocation events consistent with WIOA §134(a)(2)(A) and 20 CFR §§682.300–682.330. NMDWS will retain responsibility for statewide Rapid Response activities, while NALWDB, Career TEAM, the One-Stop Operator, Wagner-Peyser, UI, education and training partners, and other appropriate community partners will support the local response.

This modification strengthens the prior Rapid Response strategy by using current LMI, employer information, WARN and non-WARN activity, and regional industry projections to identify workers and communities at risk of displacement before unemployment becomes prolonged. Regional projections show contraction in mining/oil and gas, utilities, finance, and wholesale trade. Rapid Response and Dislocated Worker strategies will therefore include transferable-skills assessment, prior occupation and wage review, short-term recredentialing, training, OJT, apprenticeship connections, supportive services when allowable, and referral to growing or in-demand occupations.

San Juan County will remain a primary economic-transition focus because of its concentration of energy and extraction activity and projected regional declines in mining/oil and gas and utilities. Career TEAM will continue to screen affected workers for Dislocated Worker eligibility and connect transferable technical skills to construction, industrial maintenance, healthcare, technical occupations, and public-service pathways. McKinley County will receive targeted attention when mining, industrial, transportation, or related employers experience layoffs or contraction. Because McKinley also has low labor-force participation, high poverty, and limited training diversity, referrals will emphasize healthcare, education/public service, construction, technical training, work-based learning, and supportive-service connections rather than automatically directing displaced workers back into historically concentrated industries.

Other counties will be addressed according to the nature of the dislocation and current county LMI. In Cibola, where employment declined 2.4 percent from 2020–2024, and no approved training provider is physically

located in the county, Rapid Response referrals may require cross-county training, transportation support, and employer-based learning. In rural counties such as Mora and Colfax, limited local training capacity will require early referral to accessible cross-county, work-based, or partner-provided services. In Santa Fe, Los Alamos, and other growing employment centers, Career TEAM will use employer and LMI information to develop referral pathways for displaced workers from surrounding counties into higher-demand healthcare, construction, public-sector, professional/technical, skilled-trade, and related occupations.

Career TEAM will document the participant's prior occupation and wage, transferable skills, target occupation, required training or credential, referral and service connection, new employment and wage, and time to reemployment where applicable. NALWDB will continue to review Rapid Response referrals and Dislocated Worker outcomes to determine whether affected workers are being connected promptly to services and whether reemployment strategies are supporting credential attainment, sustainable employment, and preservation of earnings.

C. Secondary/Postsecondary Education and Credential Pathways

Consistent with WIOA §108(b)(9) and 20 CFR §679.560(b)(9), NALWDB will continue to strengthen coordination among secondary schools, Adult Education, postsecondary institutions, Career and Technical Education (CTE), Career TEAM, YDI, the One-Stop Operator, eligible training providers, apprenticeship programs, and employers to align education and workforce services, improve career pathways, and avoid unnecessary duplication.

This modification strengthens the prior strategy by using county-level labor-market conditions, existing education and training assets, ETPL capacity, employer demand, and regional growth and contraction projections to identify where to develop additional pathways. Because NMDWS long-term industry projections are regional rather than county-specific, county strategies use each county's current industry structure and employment trends together with Northern Region projections to determine where education and training investments are most appropriate.

NALWDB will continue to maintain a county-level ETPL capacity review and will work with colleges, universities, Tribal institutions, CTE programs, apprenticeship sponsors, and other qualified training providers to identify programs that align with documented demand and may be appropriate for State ETPL eligibility. Formal provider and program eligibility will remain subject to NMDWS requirements and the State ETPL process under 20 CFR §680.460.

Career TEAM will use assessment, career planning, LMI, and training-provider performance to connect eligible Adult and Dislocated Worker participants to training directly linked to employment opportunities, consistent with 20 CFR §§680.210 and 680.220. YDI will continue to coordinate secondary completion, dual credit, CTE, occupational skills training, Work Experience, pre-apprenticeship, apprenticeship, and postsecondary transition consistent with the Youth program elements at 20 CFR §681.460.

County strategies will include the following:

Cibola County: Cibola's principal challenge is not the absence of a post-secondary institution but the disconnect between existing local education capacity and the current ETPL. NMSU Grants is located within the county and currently offers programs in automotive and welding technology, building trades, electrical systems, EMS, nursing assistant, phlebotomy and other health careers, computer technology, early childhood education, business, drafting, digital marketing, and energy technology; however, the current ETPL analysis identifies no approved program physically located in Cibola County. Cibola also experienced a 2.4 percent decline in total employment from 2020–2024, and healthcare and social assistance is its largest private industry. Northern Region projections support continued growth in construction, education, government/public service, healthcare, and professional/technical occupations. NALWDB will therefore work with NMSU Grants to identify qualifying programs that could pursue State ETPL eligibility, particularly in healthcare, construction/skilled trades, education, technical/digital, and public-service pathways. YDI will strengthen dual-credit, CTE, WEX, and pre-apprenticeship connections with local schools, while Career TEAM will connect eligible Adult/DW

participants through ITAs, OJT, apprenticeship, and related services. Tribal/community outreach, transportation, digital access, and supportive services will be coordinated so that adding a training option results in practical access for residents.

Colfax County: Colfax currently has no approved ETPL program physically located in the county despite having an existing postsecondary asset through Luna Community College's Springer Satellite, which serves Colfax County and offers Business Administration, Early Childhood Multicultural Education, Teacher Education, building trades, furniture/cabinet making, practical-nursing prerequisites, automotive and welding coursework, GED services, distance education, and dual credit with Springer, Maxwell, Cimarron, and Raton schools. County employment increased 9.0 percent from 2020–2024, and accommodation and food services is the largest private industry. Regional projections show continued growth in accommodation/food services and arts/recreation, as well as construction, education, and healthcare. Colfax's older population also creates ongoing demand for healthcare and home-care replacement. NALWDB will work with Luna to determine whether qualifying Springer-delivered or locally cohort-delivered programs in building trades, welding/automotive, early childhood/teacher education, business/administrative services, healthcare/home care, and related areas can pursue ETPL inclusion. Hospitality training will emphasize supervision, management, culinary advancement, digital marketing, and year-round transferable skills rather than entry-level food-service placement alone. Transportation/CDL training will be expanded only when current openings and wages demonstrate demand, particularly because transportation and warehousing is projected to contract slightly at the regional level.

Los Alamos County: Los Alamos has the strongest employment growth in the Northern Area, increasing 29.9 percent from 2020–2024, and professional, scientific, and technical services is the county's largest private industry. That sector is projected to grow 11.1 percent regionally, yet the current ETPL analysis shows no approved program physically located in Los Alamos County. This represents an alignment opportunity because UNM-Los Alamos already offers programs and stackable certificates in computer science, pre-engineering, electro-mechanical technology, Nuclear Enterprise Science and Technology, nuclear waste operations, radiation control technology, robotics, welding, EMT/CNA, accounting, business, and related technical fields. NALWDB will work with UNM-Los Alamos and employers to evaluate qualifying workforce programs for ETPL eligibility and strengthen pathways into technical, IT/cyber, engineering-technician, laboratory-support, radiation/nuclear-support, skilled-trade, project-support, procurement, and administrative occupations. The strategy will extend beyond Los Alamos residents by creating cross-county pathways from Rio Arriba, Santa Fe, Mora, and other surrounding communities. YDI will use dual credit, internships, career exploration, WEX, and pre-apprenticeship to expose Youth to these careers, while Career TEAM will use ITAs, OJT, apprenticeship, and employer-linked training to bridge Adult/DW participants into both degree and non-degree technical occupations.

McKinley County: McKinley presents one of the clearest mismatches between available education resources, current ETPL composition, and employer demand. The county currently has 12 locally located ETPL programs, but nine focus on transportation/CDL and three on industrial, construction, or automotive training. At the same time, healthcare and social assistance is McKinley's largest private industry, school systems are major employers, and regional projections support growth in healthcare, education, construction, public service, and professional/technical occupations. Transportation and warehousing are projected to decline slightly regionally, while mining/oil and gas is also projected to contract, reinforcing the need to diversify rather than continue expanding training solely because CDL or industrial capacity already exists. UNM-Gallup currently offers nursing, CNA, EMS, medical laboratory technology, health information/coding, dental assisting, human services, early childhood and teacher education, business, construction, automotive, and welding programs. Its CTE partnership also enables area high school students to earn high school and college credit in career programs. Navajo Technical University in Crownpoint adds significant capacity in nursing, engineering, IT, advanced manufacturing, construction, electrical trades, welding, automotive, business, and other technical programs. NALWDB will work with these institutions and Tribal partners to identify high-demand programs not currently represented on the ETPL and support appropriate State eligibility applications. YDI will strengthen

school-to-CTE-to-postsecondary pathways, while Career TEAM will expand Adult/DW access to healthcare, education, technical, business/public-service, and skilled-trade credentials. Transportation, broadband, documentation, and culturally responsive Tribal/community access will remain essential components of successful participation.

Mora County: Mora currently has no approved ETPL program physically located in the county, but Luna Community College maintains a Mora site, creating an existing platform that may be used more intentionally for local or hybrid education and workforce delivery. Healthcare and social assistance is the county's largest private industry, while Northern Region projections support growth in construction, healthcare, education, government/public service, administrative/support services, and related technical occupations. These sectors also align with Mora's need for infrastructure, maintenance, community recovery, health, and public-service workforce capacity. Career TEAM and YDI will continue working with Luna Community College, nearby New Mexico Highlands University, school districts, employers, and other partners to identify programs that could be delivered through local cohorts, hybrid instruction, the Mora site, or supported cross-county arrangements. Potential areas include building technology, electrical and welding skills, healthcare/home care and community health, EMT, business/administrative and computer skills, early childhood/teacher education, and public-service pathways. YDI will coordinate dual credit, secondary completion, WEX, pre-apprenticeship, and transition to postsecondary education, while Career TEAM will use ITAs, OJT/TJT, apprenticeship, and other allowable training strategies. Because broadband access, travel distance, and disability-related barriers are significant, local computer access, transportation, scheduled in-person services, and hybrid delivery will be treated as part of the training strategy rather than as separate considerations.

Rio Arriba County: Rio Arriba has a significant local higher-education asset in Northern New Mexico College (NNMC), yet the current ETPL analysis identifies only four locally approved programs through one provider, all in healthcare. Healthcare remains an important pathway and the county's largest private industry, but the concentration leaves gaps in other sectors supported by regional demand. Northern Region projections show growth in professional/scientific/technical services, construction, education, government/public service, and healthcare, while Rio Arriba is also strategically positioned within the Los Alamos labor shed. NNMC now offers or is developing technical-trade pathways in electrical technology, plumbing, pipefitting, carpentry, welding, and HVAC, in addition to engineering technology, information technology, business/project management, education, and other programs. NALWDB will therefore work with NNMC to determine which qualifying programs are not currently represented on the ETPL and could pursue State eligibility, with particular attention to construction/maintenance, electrical/HVAC, IT/technical, education/public service, and business/project-support pathways while preserving the county's healthcare strength. NNMC's existing dual-credit technical-trades model provides an opportunity for YDI to connect Youth to college credit, pre-apprenticeship, union pathways, and recognized credentials before exit. Career TEAM will develop corresponding Adult/DW pathways and cross-county connections to Los Alamos employers. Transportation, broadband, bilingual outreach, and Tribal/community partnerships will support access.

San Juan County: San Juan differs from the rural zero-provider counties because it already has substantial training capacity. The current ETPL includes 34 locally located programs, although all are concentrated within one local provider. San Juan College provides extensive programs through schools of Energy, Health Sciences, Trades and Technology, Business/IT/Social Sciences, and Science/Math/Engineering. San Juan employment increased 10.7 percent from 2020–2024, and healthcare and social assistance is the largest private industry; however, the county is also the Northern Area's primary economic-transition area because regional projections show substantial contraction in mining/oil and gas and utilities. The coordination strategy will therefore focus less on simply adding training volume and more on aligning existing education capacity with the changing economy. NALWDB, San Juan College, Career TEAM, YDI, and employers will continue to strengthen pathways in industrial maintenance, instrumentation and controls, occupational safety, construction, water/infrastructure occupations, cybersecurity/IT, healthcare, skilled trades, and public service. Existing petroleum- and energy-specific training will be evaluated against current employer demand and the transferability of skills into growing or adjacent sectors. Career TEAM will use recredentialing, OJT,

apprenticeship, and Rapid Response connections for Adult/DW participants, while YDI will build education, work-based learning, and credential pathways tied to sectors with sustainable demand. NALWDB will also monitor the risk created by relying on one institution for most local ETPL capacity and identify complementary providers or cross-county options where needed.

San Miguel County: San Miguel already has two major postsecondary resources through Luna Community College and New Mexico Highlands University, and the current ETPL includes 21 locally located programs through two providers. Healthcare and social assistance is the largest private industry, while regional projections also support growth in education, government/public service, construction, professional/technical occupations, and administrative/support services. Luna offers nursing and allied health, community health, automotive, building technology, electrical wiring, welding, business, early childhood/teacher education, computer information systems and cybersecurity, among other programs. NMHU adds teacher education, nursing, social work, business, software/computer science, public-service, and other professional pathways. The primary strategy is therefore not simply to add more programs, but to determine which locally available programs are missing from or underrepresented on the ETPL and whether current approved programs are producing timely completion, credentials, and employment. NALWDB will work with both institutions and employers to strengthen healthcare, education/teacher, community health, construction/maintenance, cybersecurity/IT, software, business/administrative, and public-service pathways where demand is validated. Career TEAM and YDI will coordinate referrals and co-enrollment with these institutions, including dual-credit and school-to-college pathways for Youth. Provider quality, training duration, milestone completion, and direct employer connections will remain central to Board oversight.

Santa Fe County: Santa Fe has the strongest and most diversified education and ETPL infrastructure in the Northern Area, including **Santa Fe Community College (SFCC)** and other postsecondary resources. The current ETPL includes 37 locally located programs through five providers, but the existing mix is deeper in healthcare, hospitality/personal services, and business than in technical/STEM, education, and skilled trades. County employment increased 10.0 percent from 2020–2024, and accommodation and food services is the largest private industry. Regional projections show substantial growth in professional/scientific/technical services, accommodation/food services, arts/recreation, construction, education, government, and healthcare. SFCC already offers pathways in health sciences, computer science and cybersecurity, engineering, teacher education, automotive, trades, sustainability, business, and accelerated workforce training. NALWDB will continue working with SFCC and other providers to shift marginal ETPL expansion toward higher-wage technical/STEM, computer/cybersecurity, education/public service, skilled trades, broadband/infrastructure, and credentialed healthcare pathways. Hospitality, culinary, film, and arts pathways will remain important but will be emphasized when training supports supervisory advancement, management, technical skills, entrepreneurship, digital skills, or year-round employment rather than reproducing lower-wage entry-level placement. YDI will strengthen dual-credit and work-based pathways, while Career TEAM will focus on credential completion and advancement for low-income and underemployed workers who face childcare, transportation, scheduling, and cost-of-living barriers.

Taos County: Taos has an existing postsecondary anchor in **UNM-Taos** and 20 locally located ETPL programs, but the current inventory relies on one local provider and is deepest in healthcare and hospitality/arts/personal services, with limited depth in skilled trades and technical programs. County employment increased 12.6 percent from 2020–2024, and accommodation and food services is the largest private industry. Regional projections show continued growth in accommodation/food services and particularly arts/entertainment/recreation, while construction, healthcare, education, and professional/technical occupations also provide diversification opportunities. UNM-Taos currently offers nursing and allied-health pathways, construction technology, information technology, hospitality management, culinary arts, early childhood and teacher education, entrepreneurship, film/digital media, 3D printing, woodworking, CDL, and other certificates and degrees. NALWDB will work with UNM-Taos to identify qualifying programs—particularly construction/maintenance, IT/digital, technical, education, and higher-level hospitality pathways—that should be evaluated for ETPL inclusion or expanded utilization. Hospitality training will focus on management, culinary

advancement, digital marketing, entrepreneurship, and year-round employment. YDI will connect secondary and HSE participants to postsecondary education, WEX, career-technical training, and credentials, while Career TEAM will support Adult/DW advancement into healthcare, skilled trades, technical/digital, and supervisory pathways. Provider concentration will be monitored so participants retain meaningful training choice and alternatives when local classes are unavailable.

Across all ten counties, the Board will continue to compare available secondary, postsecondary, CTE, apprenticeship, and ETPL capacity with current LMI and employer demand rather than treating the State ETPL as a static list. Where an existing college offers a relevant program that is not represented on the ETPL, NALWDB will engage the institution regarding State eligibility requirements and documented local demand. Where creation of an additional ETPL program is not practical, Career TEAM and YDI will use allowable cross-county training, dual credit, partner-funded education, apprenticeship, OJT, WEX, cohort delivery, and supportive services to create an alternative pathway.

NALWDB will monitor whether education coordination results in actual progression by reviewing referral completion, training entry, MSG, recognized credentials, postsecondary transition, completion, employment, earnings, provider performance, and county ETPL capacity. This modification therefore moves the secondary/postsecondary strategy from general coordination toward an active county-based process for identifying education assets, filling training gaps, and building pathways into sectors that offer sustainable employment.

D. Supportive Services

Supportive services will be used as a participation and retention strategy when an assessed barrier would prevent an eligible participant from accessing or completing an allowable service. Depending on program eligibility and local policy, support may include transportation, childcare, technology/connectivity, required work items, testing/licensure costs, or other allowable assistance. Title I and partner resources will be coordinated to avoid duplication, but coordination will not delay a time-sensitive training or employment start. The service plan and case notes will identify the barrier, support provided, funding source, amount/period where applicable, and its connection to the participant's service strategy.

E. Follow-Up Services

Follow-up will be program-specific. For Adults and Dislocated Workers, follow-up services will be made available as appropriate for at least 12 months following the first day of unsubsidized employment, consistent with 20 CFR §680.150. Youth follow-up services will be provided for at least 12 months after completion of participation consistent with Youth requirements. Follow-up will address retention, barriers, credential verification, advancement, wage progression, education/training transitions, and referrals. The Board will monitor contact completion and use unsuccessful-contact patterns as an early warning for service quality and performance risk.

F. Service Priorities

The Board and One-Stop Operator will ensure that Adult-funded individualized career and training services apply the required priority for public-assistance recipients, other low-income individuals, and individuals who are basic skills deficient, while also applying veterans' priority of service. Provider procedures and monitoring will verify that priority determinations are documented correctly and not generalized to programs with different eligibility/priority rules.

G. Outreach, Professional Development, and Referrals

Partner outreach will use consistent messaging and shared events where appropriate, but will be targeted by county conditions and population needs rather than relying only on regional marketing. Outreach will include rural/Tribal/community sites, schools, correctional/reentry partners, employers, public-assistance programs,

disability organizations, veterans partners, and other referral sources. NALWDB will track referral completion and service uptake.

Professional development will be coordinated across partners on program roles, LMI, accessibility/language access, referrals, and customer service. Title I provider training will be risk-based using monitoring and performance data. Referral protocols will define the sending/receiving program, information that may be shared, consent/confidentiality requirements, expected follow-up, and escalation when the participant does not connect.

H. Coordination with Other Partner Programs

The one-stop system will coordinate with Job Corps, AmeriCorps, YouthBuild, Native American programs, MSFW/NFJP programs, education partners, economic development, community-based organizations, justice/reentry programs, and other local initiatives when they provide services that complement the participant's career pathway. The final Attachment C/D materials will identify current partners rather than preserving obsolete program names from the prior plan.

VII. Administrative Elements: Fiscal and Performance Management

A. Entity Responsible for Disbursal of Grant Funds

The designated fiscal agent is responsible for grant-fund disbursal and related fiscal functions assigned by the chief elected officials/Board, while NALWDB retains its governance, oversight, and internal-control responsibilities. Program authorizations, invoices, payment requests, disbursements, and General Ledger reconciliation must create a complete audit trail.

B. Competitive Procurement for Title I Activities

Consistent with 20 CFR §679.560(b)(15), this modification clarifies the competitive process NALWDB will continue to use to award subgrants and contracts for WIOA Title I activities. Procurements will be conducted in accordance with the Board's current Procurement and Contracting Policy, applicable WIOA requirements, 2 CFR §§200.318–200.327, NMDWS requirements, and other applicable State and local requirements.

Procurement Planning and Determination of Need. Before issuing a solicitation, NALWDB will document the programmatic need, available funding, scope of services, anticipated contract period, and expected outcomes. Planning for Title I procurements will consider the Local Plan, current labor-market and participant data, service and geographic gaps, prior provider performance and monitoring results, and the level of services needed for Adult, Dislocated Worker, Youth, or one-stop system activities. The procurement file will document the procurement method selected and the basis for that determination.

The Executive Director, serving as the Board's Chief Procurement Officer, will oversee the procurement process. For formal procurements, the Board Chair will appoint an ad hoc Procurement Committee to review the procurement plan, approve issuance of the solicitation package, and oversee the selection process. The Finance Committee will review the availability and proposed allocation of funds, and the full Board will approve the award before contract execution, consistent with the Board's Procurement and Contracting Policy.

Development and Publication of the Solicitation. When competitive proposals are used, NALWDB will develop a Request for Proposals (RFP) that clearly identifies the services being procured, service area and populations to be served, required WIOA activities, anticipated funding, contract expectations, performance and reporting requirements, minimum proposer qualifications, submission requirements, and evaluation factors and their relative importance. Specifications will promote full and open competition and will not contain unnecessary requirements that improperly restrict competition. The RFP will be publicly advertised and distributed broadly enough to obtain meaningful competition from qualified organizations, with sufficient time provided for potential offerors to prepare proposals.

Conflict-of-Interest Controls. Individuals participating in the development of the solicitation, evaluation of proposals, recommendation of an award, or approval of the procurement will comply with NALWDB's conflict-of-interest requirements. Before participating in the evaluation or selection process, individuals will disclose any actual or apparent financial, organizational, family, employment, or other conflict that could impair impartiality. An individual with a conflict will not participate in the affected procurement decision and will be recused from proposal evaluation and award deliberations. This requirement applies to Board members, staff, committee members, evaluators, and other agents involved in the procurement process, consistent with 2 CFR §200.318(c).

Proposal Evaluation and Scoring. The Agency will evaluate proposals received by the established deadline using the criteria and relative weights published in the RFP. Evaluators will use a standardized scoring process, and evaluation records, individual or consensus scores, comments, and the basis for the recommendation will be retained in the procurement file. Evaluation will consider factors appropriate to the procurement, which may include:

- understanding of WIOA and the proposed scope of work;
- demonstrated experience and past performance;
- program design and ability to meet WIOA performance requirements;
- organizational, staffing, fiscal, administrative, and technical capacity;
- ability to provide accessible services throughout the Northern Area and to individuals with barriers to employment;
- employer, education, one-stop partner, and community coordination;
- data, documentation, fiscal-control, and reporting capacity;
- proposed outcomes and methods for measuring performance; and
- proposed cost, cost effectiveness, and overall value to the workforce system.

Award decisions will be based only on the criteria identified in the solicitation. If interviews, oral presentations, demonstrations, or clarification questions are used, the RFP will identify their role in the evaluation process and comparable procedures will be applied to participating offerors. The award will be made to the responsible offeror whose proposal is determined to be most advantageous to the program, considering price and other published factors.

Cost/Price and Responsibility Review. Before award, NALWDB will determine that the proposed cost or price is fair and reasonable and will complete the level of cost or price analysis required by applicable federal requirements and Board policy. When required, NALWDB will develop an independent cost estimate before receiving proposals. NALWDB will also determine that the recommended offeror is responsible and possesses the integrity, past-performance record, financial resources, technical capacity, staffing, and other resources necessary to successfully perform the proposed agreement, consistent with 2 CFR §§200.318(h) and 200.324.

Selection and Board Approval. Evaluation results and the documented recommendation will be presented through the procurement structure established by Board policy. The ad hoc Procurement Committee will review the selection based on the published evaluation criteria; the Finance Committee will address the proposed funding allocation; and the full Board will approve the award before execution. Following required approval, the Executive Director will execute the contract or other agreement within the authority established by Board policy. The procurement record will document the solicitation, advertisements and distribution, proposals received, conflict-of-interest documentation, evaluations and scoring, selection or rejection rationale, cost/price analysis, approvals, and final agreement.

WIOA-Specific Provider Selection. The competitive process will be adapted to the Title I activity being procured. Youth service-provider grants or contracts will be competitively awarded consistent with WIOA §123 and 20 CFR §681.400, including consideration of State-established criteria and the provider's ability to meet Youth performance accountability measures.

The One-Stop Operator will be selected through a competitive process consistent with WIOA §121(d)(2)(A) and 20 CFR §678.605. The solicitation will clearly define the operator's coordination responsibilities and maintain the required separation between operator functions and Board governance, oversight, provider selection, and other prohibited functions. Federal regulations require competitive selection of the One-Stop Operator at least once every four years and permit the State or Local Board to conduct competition more frequently.

Participant Training and ETPL. NALWDB will distinguish procurement of Title I program operators and service providers from participant-level training purchases. Individual Training Accounts are not awarded through the Title I service-provider RFP process. Eligible participants select training from programs on the State Eligible Training Provider List in accordance with WIOA §134(c)(3)(G), applicable regulations, informed-customer-choice requirements, and NALWDB policy.

Noncompetitive and Failed Competition. Noncompetitive procurement will not be used as an alternative to required competition. It may be used only when an allowable circumstance under 2 CFR §200.320 and applicable Board/NMDWS requirements exists. The procurement file will contain the written justification, efforts made to obtain competition, failed-competition analysis when applicable, cost or price reasonableness determination, and all required approvals before award.

Contract Administration and Monitoring. Competitive selection will not end with contract award. Contracts and subawards will include the scope of work, performance expectations, fiscal and program requirements, reporting requirements, applicable federal provisions, monitoring and record-access requirements, corrective-action provisions, and terms for renewal, modification, or termination. NALWDB will continue to monitor Title I providers for program performance, fiscal integrity, participant-file compliance, service quality, and achievement of contracted outcomes. Continuation or renewal of multi-year services will remain subject to satisfactory performance, availability of funds, and the requirements of the original procurement and Board policy.

NALWDB will maintain a complete procurement history sufficient to demonstrate the rationale for the procurement method, basis for selection or rejection, contract type, price reasonableness, approvals, and resulting award, consistent with 2 CFR §200.318(i). The current Procurement and Contracting Policy and applicable conflict-of-interest provisions will be included in Attachment A of the Local Plan.

C. Local Performance Levels and PY25 Performance Analysis

Attachment E will contain the final negotiated PY26/PY27 local performance levels. The table below uses validated PY25 actuals and the targets/benchmarks in the Board's PY25 Executive Performance Summary to identify where the modification must focus. These values are planning evidence and do not replace Attachment E.

Measure	PY25 actual	Target/benchmark	Gap	Strategic response
Youth Measurable Skill Gains	32.47%	79%	-46.53 points	Monthly MSG review; learning-plan milestones; provider/employer/school evidence; supervisor review.
Youth Credential Attainment	35.71%	55%	-19.29 points	Credential mapping, provider responsibility, exam/licensure follow-up, verify before closure.
Adult Median Earnings	$6,801	$9,500	-$2,699	Higher-wage pathways, advancement, OJT, and wage/occupation tracking.
DW Credential Attainment	45.45%	65%	-19.55 points	Credentialed transition pathways and completion/evidence monitoring.
Adult MSG	86.71%	Above negotiated goal	Strength	Preserve progression practices and analyze conversion to credentials/earnings.

D. Actions Toward a High-Performing Board

- Use a quarterly participant-to-demand dashboard connecting LMI, participant characteristics, training, provider outcomes, performance, employer outcomes, and county access.
- Require timely Board/committee review of measures below goal and documented corrective strategies with responsible parties and due dates.
- Use provider and ETPL outcome review to inform technical assistance, recruitment, referrals, and policy changes.
- Maintain a risk-based monitoring plan, follow-up monitoring, payment reconciliation, electronic-file standards, and supervisory QA.
- Use employer and participant feedback as evidence, while distinguishing anecdotal feedback from validated performance data.
- Provide Board member training on WIOA governance, performance, fiscal oversight, conflict of interest, procurement, and regional LMI.

E. Training Services, ITAs, Contracts, and Informed Customer Choice

ITAs will remain the primary mechanism for eligible training services where applicable. Selection will be based on assessment, prerequisites for the chosen training, labor-market information, the participant's career plan, provider/program information, cost, duration, access, and informed customer choice. The Board will not impose a blanket "college-level functioning" requirement; it will evaluate readiness against the actual prerequisites and support needs of the selected program.

Contracts may be used instead of ITAs only under the exceptions authorized by 20 CFR §680.320, including OJT/TJT, customized training, incumbent worker training or Transitional Jobs; an insufficient-provider determination made through the required process; demonstrated-effective programs for individuals with barriers; multiple-individual training in in-demand sectors/occupations; or pay-for-performance where applicable. If the Board uses the insufficient-provider exception, the determination will include the required public-comment process and will be described/documented as required.

Informed customer choice will be preserved regardless of mechanism. Case managers will present realistic options, including provider outcomes and access constraints, rather than steering participants toward a provider solely because it is nearby, familiar, or historically used.

F. Pay-for-Performance Strategy

NALWDB does not currently plan to implement a WIOA pay-for-performance contract strategy. The Board may revisit this determination if it identifies a service model and performance structure that meet statutory/regulatory requirements and are supported by Board approval and fiscal capacity.

G. Minimum Training Expenditure Requirement

The current NMDWS PY2026 guidance requires Local Boards to achieve or exceed a 40 percent Minimum Training Expenditure Requirement. The guidance also directs Boards to obligate at least 80 percent and expend at least 40 percent of current-year funding by the end of the third quarter. NALWDB will monitor obligation and expenditure monthly and pair expenditure monitoring with training quality so that meeting the fiscal threshold does not encourage investment in programs poorly aligned with demand or outcomes.

H. Integrated Technology-Enabled Intake and Case Management

One-stop partners will use NMDWS-designated case-management, labor-exchange, and reporting platforms according to State implementation, security standards, and role-based access. PY25 monitoring refers to the Title I management information system as NM Jobs; the PY2026 guidance also references ReadyNM and other NMDWS-designated systems. Co-enrollment and data sharing will follow program permissions, confidentiality requirements, releases/consents where applicable, and executed agreements.

I. Continuous Monitoring, Quality Assurance, and Data Integrity

Monitoring will be integrated with performance management. PY25 Adult/DW files averaged approximately 48 percent electronic-file completeness, and Youth files approximately 41 percent. Payment verification was absent from the reviewed Adult/DW participant electronic files even where payments could later be verified through Fiscal Agent/General Ledger records. Youth Work Experience was the highest compliance-risk area, with recurring learning-plan, hiring-packet, timesheet, employer-evaluation, payment, and activity-closure deficiencies. These findings can impair audit defensibility, data validation, and the Board's ability to intervene before a participant disengages or exits without a credential/MSG.

Monitoring stage	Minimum practice	Leading indicator / use
Front-end eligibility	Supervisor/provider review of eligibility path and source documentation before substantial expenditure.	Eligibility error rate; corrective TA.
Service planning	Complete OAS/IEP/ISS tied to barriers, occupation, wage, training/WBL, and supports.	Plan completeness; time to first service.
Monthly progression	Attendance, provider/employer feedback, MSG/credential milestones, barriers and case notes.	On-time progress reviews; early intervention.
Payment/reconciliation	ITA/OJT/TJT/WEX authorization, invoice/timesheet, approval, payment and GL reconciliation.	Reconciliation completion; unsupported-cost prevention.
Outcome verification	Credential, completion, employment, and activity-closure support before reporting/closure.	Credential timeliness; valid outcomes.
Follow-up monitoring	Re-review high-risk counties/providers/files after corrective action.	Repeat findings; corrective-action effectiveness.

VIII. Definitions Required by the PY2026 Guidance

A. Youth "Requires Additional Assistance"

NALWDB uses the Youth "requires additional assistance to complete an educational program or to secure or hold employment" eligibility category in accordance with Board Policy No. 21 – Requires Additional Assistance.

Under the Board's locally adopted definition, a youth requires additional assistance when, based on an individualized assessment, the youth faces circumstances that significantly impede progress toward completing an educational program or securing or retaining employment, and those circumstances are not otherwise captured under another WIOA Youth barrier. The determination is based on the functional impact of the identified circumstances and must be applied consistently and equitably.

Circumstances that may support the determination include, but are not limited to, academic performance or credit deficiencies, risk of school dropout or chronic absenteeism, limited or no prior work experience, recent or repeated job loss, residence in a high-poverty or high-unemployment area, limited access to transportation or other supports necessary for school or employment, and other social, economic, or transitional barriers that significantly affect the youth's ability to complete education or secure or retain employment.

Documentation must be sufficient to demonstrate the need for additional assistance and must be maintained in the participant's electronic file. Acceptable documentation may include case notes documenting the individualized assessment and identified barriers, school records, employment history, or statements from education or workforce professionals describing the functional impact on education or employment. When third-party documentation is unavailable or cannot reasonably be obtained, a signed and dated self-attestation may be used when supported by case notes explaining why other verification was unavailable and consistent with applicable documentation requirements.

For In-School Youth, NALWDB tracks use of this eligibility barrier to ensure that no more than five percent of newly enrolled ISY participants in a program year are determined eligible solely under the "requires additional assistance" category, consistent with 20 CFR § 681.310(b). NALWDB Policy No. 21 is included in Attachment A of this Local Plan.

B. Basic Skills Deficient

NALWDB will continue to apply the WIOA definition of Basic Skills Deficient (BSD) in the Adult, Dislocated Worker, and Youth programs and, through this modification, will strengthen how basic-skills needs are identified and incorporated into service planning. Career TEAM and YDI will use appropriate assessment tools, educational history, employment history, English-language proficiency, and other relevant information to determine whether a participant has basic-skills needs and to identify the level of intervention necessary to support successful participation in education, training, and employment.

The Northern Area's county data demonstrates that basic-skills strategies cannot rely on a single service model. Several counties have lower educational attainment, while rural communities face limited access to training, transportation, and broadband; other communities have significant populations speaking a language other than English at home or require culturally responsive services. At the same time, growing sectors such as healthcare, construction, education/public service, and professional/technical services increasingly require occupational literacy, math, digital skills, technical vocabulary, and recognized credentials. Career TEAM and YDI will therefore incorporate county conditions and the participant's intended career pathway when determining the appropriate BSD response.

For Adult and Dislocated Worker participants, Career TEAM will continue to incorporate identified basic-skills needs into career planning and the IEP, as applicable, rather than treating remediation as a separate activity unrelated to the participant's employment goal. Participants may be referred or co-enrolled with Adult Education and other education partners for adult basic education, high-school equivalency, English language acquisition, digital literacy, Integrated Education and Training (IET), or other appropriate instruction. Whenever feasible, foundational skill development will be contextualized to the participant's target occupation so that remediation supports progression into training and employment rather than unnecessarily delaying entry into a career pathway.

For Youth, YDI will continue to identify basic-skills needs through the objective assessment and incorporate the results into the ISS. Services may include tutoring, study-skills instruction, secondary-school or HSE completion, dropout-recovery services, occupational skills training, concurrent education and workforce preparation, Work Experience with identified learning objectives, pre-apprenticeship, and transition to postsecondary education or training. YDI will strengthen coordination with secondary schools, Adult Education, CTE programs, postsecondary institutions, and training providers so that Youth who enter with academic deficiencies have a defined progression from foundational skills to a credential, postsecondary pathway, or employment.

NALWDB will monitor implementation through participant-file review, IEP/ISS and assessment documentation, referrals and co-enrollment with education partners, MSG and credential progression, training completion, and employment outcomes. Where monitoring or performance data indicate that participants are entering training without adequate foundational preparation, failing to achieve measurable skill gains, or exiting without credentials, NALWDB will require service providers to strengthen assessment, education-partner coordination, and early intervention strategies.

IX. County-Responsive Implementation Strategy

The county strategies below combine current LMI, access indicators, PY25 performance signals, monitoring findings, regional O*NET training utilization, and approved ETPL capacity. County strategies are implementation priorities, not separate negotiated performance targets. Participants who reside outside the ten Northern

counties but were served by the Northern Area are treated as evidence of mobility/cross-county service use and are not reported as additional Northern counties.

Cibola County

Lens	Current evidence/strategy
Unemployment / LFP	5.5% / 43.7%
Broadband/poverty / bachelor+	78.1% / 25.9% / 17.0%
ETPL capacity	0 local programs / 0 providers
PY25 signal	Employment comparatively good; aggregate Credential 25%; MSG 20%.
Monitoring	Youth Moderate; WEX/payment, eligibility pathway, OAS/ISS gaps.
Priority	Recruit/bring accessible healthcare support, construction/maintenance, education/public-service and digital/technical pathways; Tribal/community outreach; WEX/pre-apprenticeship and OJT/TJT as appropriate; transportation/documentation support.

Colfax County

Lens	Current evidence/strategy
Unemployment / LFP	5.3% / 48.0%
Broadband/age 65+ / disability	81.3% / 30.7% / 18.1%
ETPL capacity	0 local programs / 0 providers
PY25 signal	Overall MSG 95.45%; Youth employment strong; Youth Credential 9.09% (1 of 11).
Monitoring	Adult/DW High; Youth High; staffing/case management and provider/payment risks.
Priority	Local/near-local healthcare/home-care and trades/maintenance; employer-validated hospitality advancement; SCSEP/older-worker strategy; rebuild Youth continuity and credential conversion.

Los Alamos County

Lens	Current evidence/strategy
Unemployment / LFP	2.0% / 67.2%
Broadband / bachelor+ / poverty	93.4% / 69.7% / 3.8%
ETPL capacity	0 local programs / 0 providers
PY25 signal	Cohorts too small for meaningful rating.
Monitoring	Adult/DW Low; no Youth cohort rated.
Priority	Cross-county technical, IT/cyber, engineering/lab support, project/procurement/admin and skilled-trade pipelines; internships/OJT/apprenticeship; measure referrals/interviews/hires from surrounding counties.

McKinley County

Lens	Current evidence/strategy
Unemployment / LFP	5.9% / 48.3%
Broadband/poverty / bachelor+	64.8% / 26.2% / 13.3%
ETPL capacity	12 programs / 3 providers; 9 CDL/transport + 3 industrial/trades

Lens	Current evidence/strategy
PY25 signal	Relatively strong credential/earnings/Q4; DW Credential 23.53% and lower Adult/DW earnings.
Monitoring	Adult/DW Moderate; Youth documentation/eligibility/WEX issues.
Priority	Diversify ETPL beyond CDL into healthcare, education, IT/technical and business/public service; Tribal/community outreach; DW credential/earnings preservation; transportation/digital supports.

Mora County

Lens	Current evidence/strategy
Unemployment / LFP	5.8% / 46.0%
Broadband/poverty / disability	63.3% / 19.2% / 23.7%
ETPL capacity	0 local programs / 0 providers
PY25 signal	Several favorable percentages, but cohorts are very small.
Monitoring	Youth High; no Adult/DW files available in PY25 review; prolonged Youth coverage gap.
Priority	Restore Youth case-management continuity; local cohorts/mobile-hybrid access; construction/recovery, maintenance, healthcare/home-care and public-service pathways; participant-level review rather than volatile percentages.

Rio Arriba County

Lens	Current evidence/strategy
Unemployment / LFP	4.8% / 53.1%
Broadband / bachelor+ / mean commute	75.3% / 19.0% / 30.1 min
ETPL capacity	4 programs / 1 provider; all healthcare
PY25 signal	Q4 employment favorable; aggregate Credential 20%; MSG 41.18%.
Monitoring	Adult/DW Moderate; Youth Moderate; strong individualized narratives but file/payment/OAS/IEP/ISS gaps.
Priority	Preserve healthcare strength while adding construction/maintenance, IT/technical, education/public service, and business/admin; build Rio Arriba-to-Los Alamos bridge; bilingual/Tribal outreach; transportation/digital supports.

San Juan County

Lens	Current evidence/strategy
Unemployment / LFP	4.4% / 53.0%
Broadband / bachelor+ / AIAN	72.4% / 18.3% / 44.0%
ETPL capacity	34 programs / 1 provider; broad portfolio
PY25 signal	Best overall performance; strong Adult/DW employment/earnings; Youth MSG 0 of 6.
Monitoring	Adult/DW Moderate-High; Youth Moderate-High; payment tracking, DW eligibility, file organization, Youth WEX/activity coding.
Priority	Protect strong Adult/DW pipelines; Youth MSG recovery; energy-transition recredentialing and OJT; monitor single-provider resilience; payment/outcome documentation.

San Miguel County

Lens	Current evidence/strategy
Unemployment / LFP	4.5% / 50.6%
Broadband/poverty/disability	78.6% / 26.0% / 17.6%
ETPL capacity	21 programs / 2 providers; broad health/trades/CDL mix
PY25 signal	Adult strong and Youth employment positive; Youth Credential 25%; Youth MSG 31.25%.
Monitoring	Adult/DW High and Youth High; major documentation, provider, payment and staffing risks.
Priority	Immediate Youth credential/MSG and case-management recovery; use existing ETPL more strategically; strengthen ITA/OJT/provider controls; add IT/public-service support only where demand validated; pair training with supports/employer bridge.

Santa Fe County

Lens	Current evidence/strategy
Unemployment / LFP	3.9% / 57.0%
Broadband / bachelor+ / poverty	90.1% / 46.1% / 10.9%
ETPL capacity	37 programs / 5 providers; largest local inventory
PY25 signal	DW strong; Youth MSG 0 of 8; Youth Credential 25%; Adult Credential below target.
Monitoring	Adult/DW Moderate-High; Youth High; case management, eligibility, WEX/payment gaps.
Priority	Youth recovery and Adult credential completion; expand higher-wage technical/STEM, education/public-service and trades; advancement-focused OJT/internships; childcare/transport/schedule supports.

Taos County

Lens	Current evidence/strategy
Unemployment / LFP	5.6% / 55.3%
Broadband / bachelor+ / poverty	86.3% / 38.5% / 17.2%
ETPL capacity	20 programs / 1 provider; health/hospitality deepest
PY25 signal	Adult Credential/MSG strong; Youth Q2/Q4, Credential and MSG weak; Youth MSG 22.22% (2 of 9).
Monitoring	Adult/DW High; Youth High; planning, eligibility, follow-up, ITA/payment, and closure issues.
Priority	Youth engagement/follow-up/credential recovery; diversify trades/maintenance and technical/digital capacity; use hospitality training only for advancement/year-round careers; provider progress/payment controls and contingency planning.

X. Outcome Improvement, Data Governance, and Continuous Review

A. Participant-to-Demand Review

NALWDB will continue to conduct recurring reviews that connect participant and provider activity to current labor demand. The dashboard will be disaggregated by county and Title I program where sample size permits and will separately identify participants residing outside the ten-county area without treating those counties as Northern performance geographies.

- Participants served/new enrollments; age, education, employment status, low-income/public-assistance, basic-skills deficiency, disability, veteran status, and other reported barriers.
- Target occupation/sector and service/training type: ITA, TJT, OJT, Youth WEX, or other.
- Training provider/program, O*NET occupational group, start/expected end/actual end, completion, MSG, and credential status.
- Q2/Q4 employment, earnings, occupation/industry after exit, and whether employment aligns with training/career plan.
- Supportive-service use, barrier resolution, days to eligibility/service/training start, and participant contact cadence.
- Employer/worksite participation, retention, repeat employer use, and work-based-learning conversion.
- File completeness, payment reconciliation, corrective actions, and repeat monitoring findings.

B. Leading Indicators

- Days from eligibility to first substantive career/training service and days to training/WBL start.
- Percent of training participants with a documented target occupation, expected wage, credential, and employer/sector before enrollment.
- Percent of active training participants receiving a documented progress review at least monthly.
- Percent of participants eligible for MSG with a planned milestone and on-time evidence entry.
- Credential documentation rate and days from attainment to system entry.
- ETPL completion, credential, Q2/Q4 employment and earnings by provider/program/occupation.
- County ETPL access: local provider count, priority-sector programs, cross-county travel and training concentration.
- TJT transition to OJT/unsubsidized employment; OJT retention/conversion; Youth WEX completion and skill-gain evidence.
- Percent of assessed barriers resolved before service interruption.
- County-level participant/service penetration and cross-county placement to detect under-service.

C. LMI and ETPL Refresh Cycle

At least quarterly, staff will review unemployment/labor-force data, current postings, employer feedback, layoffs/Rapid Response, Title I performance, county outcomes, ETPL/provider outcomes, O*NET training mix, training access, payment/reconciliation issues, and monitoring findings. Annually, staff will refresh Census demographic indicators and incorporate new NMDWS industry/occupational projections. Material changes will be brought to the Board/appropriate committee for strategy or policy adjustment.

XI. Public Comment Process

Before submission, NALWDB will provide at least a 30-day public-comment period consistent with WIOA §108(d) and 20 CFR §679.560(b)(19). The public will have an opportunity to comment on the modification, with specific outreach to businesses, education and labor organizations, and other stakeholders. The Board will review comments, document any revisions, and submit comments representing disagreement with the plan as required by 20 CFR §679.560(e).

XII. Assurances

The following assurance checklist mirrors the PY2026 NMDWS guidance. The final submission will mark each item Yes/No only after verifying the supporting policy, practice, or attachment.

#	Assurance	Yes / No
1	Input was obtained from chief elected officials, business, labor, higher education, core/other program entities, stakeholders, and the public, and the plan is publicly accessible.	
2	A policy exists identifying conflicts of interest for Board members/entities represented and procedures for resolution.	
3	A policy provides public access, including disability access, to Board meetings, membership information, and minutes.	
4	Fiscal control and fund-accounting procedures are established for WIOA Title I funds.	
5	Federal core-program funds are used only for authorized purposes.	
6	Service providers have a referral process for veterans with Significant Barriers to Employment to DVOP services when appropriate.	
7	A process exists for referring veterans with significant barriers to JVSG/DVOP career services.	
8	Procedures exist for chief elected officials to appoint Local Board members using established criteria.	
9	Priority of Service for covered persons is provided for Title I programs and advice.	
10	Appropriate action has been taken to comply with 2 CFR Part 200, 2 CFR Part 2900, and WIOA §184(a)(3).	
11	The "Equal Opportunity Is the Law" notice is maintained, posted/distributed and complaint procedures under 29 CFR Part 38 are accessible.	
12	A Language Access Plan is implemented, and electronic information/technology used by AJCs is accessible consistent with 29 CFR Part 38.	
13	Financial/program records are retained for the required period under the Uniform Guidance, including 2 CFR §200.334, and available for monitoring/audit.	

XIII. Attachments

Attachment	Required content	Draft status
A	Current LWDB policies relevant to WIOA implementation, including required PY2026 updates.	
B	Current Local Board roster, representation categories, standing committees, and committee purposes.	
C	One-stop center list: addresses, phone numbers, operator, center type, physically located partners and services.	
D	Current cooperative/resource-sharing agreements and MOUs relevant to WIOA, including disability coordination agreements.	
E	PY26/PY27 negotiated local performance levels and related performance information.	Pending

XIV. Signatures

The final Local Plan Modification will be signed after required public comment, Board approval, and completion of the attachment package.

_____ Date: _____

Chief Elected Official

_____ Date: _____

Local Board Chair

Appendix 1. PY2026 Guidance Compliance Crosswalk

Authority/guidance	Requirement	Draft section	Status
§679.580(b)(1)	Economic/labor-market changes	I.A	Draft complete
§679.580(b)(2)(ii)	Funding/service-level changes	I.B	Board data needed
§679.350 / WIOA §107(c)(2)	Subsequent Board certification	I.C	Certification/audit evidence needed
§679.560(a)(1)-(4)	Economic/workforce/activity analysis	II.A-II.B	Draft complete
§679.560(a)(5)-(6)	Vision/goals/resource alignment	II.C-II.D	Draft complete
§679.550(c)	Board area profile/structure	III.A-III.B	Roster attachment needed
§679.560(b)(1)	System programs / State Plan alignment	III.C-III.E	Draft complete; Attachment C verification
§679.560(b)(2)	Access/career pathways/credentials	III.F	Draft complete
§679.560(b)(3)-(4)	Employer/economic-development strategy	III.G	Draft complete
§679.550(c)	Cross-system training	III.H	Draft complete
§679.560(b)(5)	One-stop / provider improvement / access / roles	IV	Draft complete; operator/agreements needed
§679.560(b)(6),(8)	Adult/DW and Youth services	V.A-V.C	Draft complete; current expenditure data needed
§679.560(b)(13)	Disability cooperative agreements	V.D	Attachment D needed
NMDWS additional population items	Veterans, MSFW, Native Americans, low income/TANF, older workers	V.E-V.I	Draft complete; local provider verification needed
§679.560(b)(12)	Adult Education/Title II application review	V.J	Draft process; Board workflow confirmation needed
§679.560(b)(7),(9)-(11)	Rapid Response, education, supports, Wagner-Peyser	VI	Draft complete
§679.560(b)(14)-(18)	Fiscal agent, procurement, performance, high-performing Board, ITAs/contracts	VII.A-VII.E	Draft complete; attachments/verification needed
NMDWS §679.560(c)	Pay for performance / minimum training expenditure	VII.F-VII.G	Draft complete; current fiscal status needed
§679.560(b)(20)	Integrated technology-enabled intake/case management	VII.H	System verification needed
NMDWS §679.560(c)	Definitions	VIII	Local policy/assessment details needed
§679.560(b)(19)	30-day public comment	XI	Dates/comments needed
NMDWS assurances	Assurance checklist	XII	Board verification needed
NMDWS Attachments A-E	Attachment package	XIII	Assembly required

Appendix 2. Data Sources, Methodology, and Interpretation Notes

Primary sources used in this draft include:

- NMDWS, Guidelines for Developing WIOA Local Plan Modifications, Program Years 2024-2027, issued PY2026.
- NMDWS QCEW Northern Region Industry Employment Distribution, Q1 2026.
- NMDWS LAUS Northern Region labor force/employment/unemployment, July 2026.
- U.S. Census Bureau population and QuickFacts indicators used in the Board's PY2026 county analysis.
- NMDWS Online Advertised Jobs, Jobs De-duplication Level 2, August 26, 2026.

- NMDWS ER&A 2024-2034 Northern Region industry projections and projection methodology.
- NMDWS Northern Workforce Region Occupational Outlook 2025, used as a supplemental occupational lens pending the corresponding 2024-2034 occupational export.
- FutureWorks BI Title I Who Is Served and Outcomes Detail views; Board-confirmed Title I filter for Outcomes Detail.
- FutureWorks WIOA Impact Report, used only as Title I + Title III system context where identified.
- PY25 Executive Performance Summary and county performance cards.
- PY25 Comprehensive Monitoring Report for Adult, Dislocated Worker, and Youth programs.
- O-Net Data of Services.xlsx (regional received-training view).
- ETPL Approved Programs (1).xlsx; exact duplicate program/provider/location rows removed for capacity analysis.
- Impact by FS.xlsx; Adult, Dislocated Worker and Youth funding-source rows used, duplicate All-FS summaries omitted.
- Current Local Plan (2024-2027) and the comprehensive regulatory markup, used only to preserve current operational content that remains supportable and to identify items needing verification or replacement.

Key interpretation cautions

- QCEW employment counts and projection base estimates use different methodologies and should not be treated as a single series.
- Online job postings are a point-in-time indicator of advertised demand, not hires, unique vacancies, or the unemployed population; only 18.9 percent of the August 26 postings included wages.
- Long-term projections measure demand direction and should be paired with employer feedback, postings, wages, annual openings, and training availability.
- County unemployment indicators in the strategy analysis use April 2026 while the regional rate uses July 2026; they demonstrate geographic variation rather than same-month comparison.
- FutureWorks employed counts are not employment rates unless the eligible denominator is available for the same cohort.
- Industry after exit is not the same as occupation. An IT worker may be employed in healthcare, government or a laboratory; occupational and industry data must be interpreted together.
- Outside-Northern residence counties in participant exports are not treated as Northern county performance geographies.
- ETPL provider address is an access/capacity indicator; participants may use eligible cross-county or online programs, but practical access must consider travel, broadband and hands-on/clinical requirements.
- Gender differences in aggregate performance/earnings are descriptive and do not establish causation. They should trigger review of occupational choice, access, supports and advancement rather than assumptions about cause.

Appendix 3. Key Regulatory References

Reference	Purpose in this plan
20 CFR §679.560	Required contents of the Local Plan.
20 CFR §679.580	Two-year Local Plan modification requirement.
20 CFR §680.600	Adult priority for public-assistance recipients, other low-income individuals, and individuals who are basic skills deficient.
20 CFR §680.150	Adult/DW career services, including follow-up availability following unsubsidized employment.
20 CFR §§680.190-195	Transitional Jobs requirements.
20 CFR §680.320	Exceptions allowing training contracts instead of ITAs.

Reference	Purpose in this plan
20 CFR §680.700 et seq.	OJT requirements.
20 CFR §§681.210 and 681.220	OSY/ISY eligibility definitions and ages.
20 CFR §678.605	Competitive selection of the One-Stop Operator.
29 CFR Part 38, including §38.9	Nondiscrimination, accessibility, and language-access requirements.
2 CFR Part 200 and 2 CFR Part 2900	Uniform administrative requirements/cost principles/audit framework.

Source: *eCFR reviewed August 28, 2026; NMDWS PY2026 Local Plan Modification Guidance.*