Workforce Synergy Forum Resources

Program Outreach: The Good, the Bad, and the Ugly



SCPa Works - Overview

- 1 Eight counties in South Central PA (Harrisburg, York, Carlisle, Hershey) Combination of urban, rural, and suburban
- 2 Labor force = 750,000 | unemployment rate < 4.0%</p>
- 3 Eight AJCs, two affiliate sites, 60+ community access points
- 4 Total budget = ~\$15M, operational budget of \$2M

Now, more than ever, we need to use our platform as workforce boards to identify new models of innovation and build out an infrastructure that reaches more people and serves our communities in better ways. – Jesse McCree, CEO, <u>SCPa Works</u>

<u>Recording</u>

Click "View session recordings" at the top right corner Search "Program Outreach: The Good, the Bad, and the Ugly"

Resources:		Agenda:
•	Slides Outreach Brief for creative efforts, cornerstones for outreach	 Understand Compliance
•	plan, and compliance matters WorkforceGPS Webinars:	 Explore Outreach Efforts
	Outreach and Marketing for the Public Workforce Development System: Exploring the Possibilities!	 Learn from SCPa Works
	 <u>Post, Like, Follow, Share! Using Social Media as an</u> <u>Outreach and Marketing Tool</u> <u>Elevate Your Outreach</u> 	 Mastermind Your Outreach Sessions
٠	Training and Employment Guidance Letter (TEGL) 03-23	

Outreach Ideas Whiteboard from Synergy Forum Mastermind Group

The Mastermind Your Outreach Synergy Forum Group was an exploratory three-part series focused on peer-to-peer strategic planning and goal setting for outreach.

National Thought Leader from Pennsylvania



Jesse McCree is a national thought-leader in investing in human talent and is the CEO of SCPa Works, the workforce development board of South Central PA. With over 15 years of executive leadership in the non-profit and private sectors, Jesse has built and scaled strategic partnerships at the intersection of the future of learning and work. He leads SCPa Works' \$15M annual investment to evaluate and advance high-impact workforce development programs that drive economic mobility. In partnership with businesses, education, and economic development providers, his team has established innovative outreach efforts with and without WIOA funds. Jesse also serves on several national boards, including the U.S. Conference of Mayors Workforce Development Council and the Federal Reserve Bank of Philadelphia's Economic and Community Advisory Council, and is Senior Advisor for Econsult Solutions, Inc. | jmccree@scpaworks.org

90% of the job is showing up, asking questions, and being engaged, whether it's a Chamber of Commerce event or a networking breakfast at the community college. Use those networks to help define yourself as a thought leader.

Rather than going to businesses and community partners with prescribed solutions, instead ask things like, "What problems are you trying to solve and in what ways can we be helpful?" – Jesse

Relational Advice!

Low-Cost Outreach!

Go where the people are. Use basic data gathering tools like heat maps to determine where people are – store fronts, food banks, faith-based organizations, etc. – and bring them fliers (old school) or post QR codes (new school) or a combo! – Jesse Community Access Points = People + Resources + Technology Community Access Points are touchpoints in strategic locations that offer actual services (a meeting with a career advisor) or a kiosk where people can plug-in to find services. Jesse is happy to share more about what works and what doesn't.



Use WIOA as a launching point and watch the doors open! More resources outside of WIOA beget more resources. Use additional funding to test new programs, demonstrate value and efficacy, and prove WIOA eligibility. – Jesse



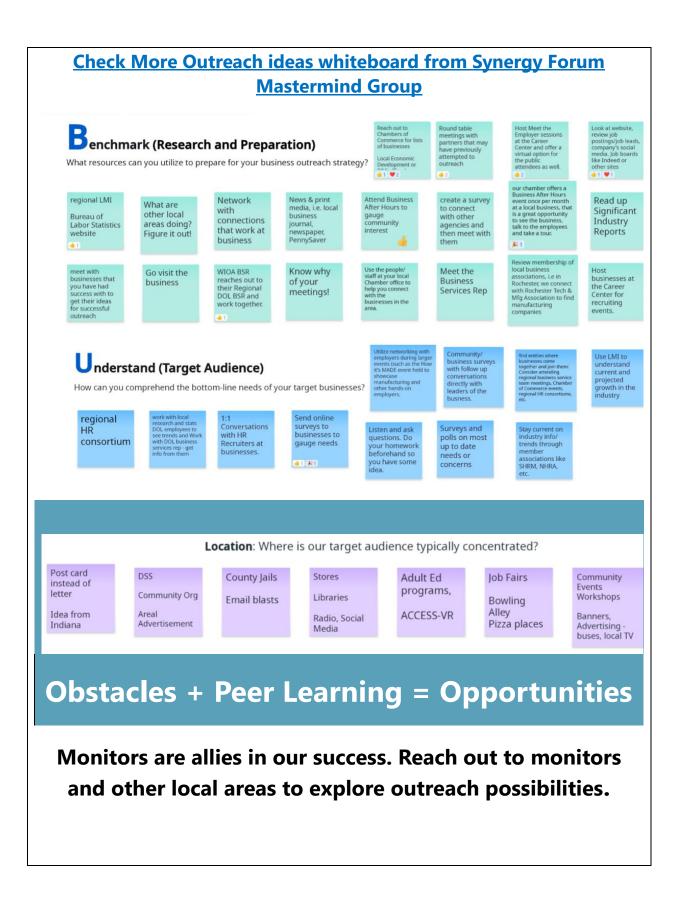
Go to your monitors. They are trusted advisors. They want to be guides and shepherds to the right source. – Jesse

Outreach Efforts Tried by Our Peers

- Website blogs
- Ads on scrolling displays at the mall
- Free TV interviews with local news
- Truck rodeo (<u>contact Gretchen Steffan!</u>)
- Radio shows/podcasts
- In-service presentations
- QR codes on fliers
- Outreach materials at laundromats, housing authorities, bus stops, etc.
- Mobile hours at public libraries
- Postcard campaigns
- Program testimonials
- Job fair at the Department of Social Services and public libraries
- Digital media campaigns to target audiences for specific programs
- Support community and program ambassadors



List of outreach efforts you have tries tested, succeeded, or failed at!



Our Responses: Have You Considered This Ou	Itreach Effort?
Create a simple survey to ask how people heard about your services and include it as part of your intake when new people come.	Yes 19 No 4 Not Sure 4 New Idea! 6
Use program champions to share testimonials/success stories that speak directly peer-to-peer and reach them through their channels.	Yes 16 No 11 Not Sure 1 New Idea! 4
We use the broadest definition of Dislocated Workers in NYSDOL Program Guidance Letter #22-01 for our enrollments.	Yes 14 No 11 Not Sure 1 New Idea! 3
Initiate planned events where staff hold office hours and workshops at libraries, facilities, and organizations serving APoS customers.	Yes 16 No 9 Not Sure 0 New Idea! 3
Pen a regular column for regional newspapers and business magazines.	Yes 8 No 13 Not Sure 1 New Idea! 2
We have outreach plans developed for our programs, services, and target populations, businesses, partners, and community organizations.	Yes 12 No 2 Not Sure 3 New Idea! 5

More About Synergy Forum Facilitators



Peter J. Nyitrai Jr. has been working with NYSDOL since 2017. Since February 2024 he has worked as an Auditor 2 (Employment &Training) in the office in Rochester, NY, providing oversight for assigned LWDAs. Peter grew up in the City of Buffalo and received his Bachelor of Science in Accounting and Minor in Marketing from Alfred University in 2011. After completing two master's degrees, one in Business Administration and another in Forensic Accounting, along with its work experience requirement, Peter became a Certified Fraud Examiner. Peter has enjoyed attending Annual Global Fraud Conferences since June 2019 and sharing insights in his work.

Juie and Meg's hands-on experience in workforce, education and leadership development programs informs their work at NYSDOL. They've traversed the streets building foundational partnerships and coalitions of support – the core of effective outreach and long-term program success.

Juie's community organizing and recruitment of participants with Teach for India, the Boys & Girls Clubs, and the University of Michigan have led to out-ofthe-box outreach efforts. Meg's recruitment initiatives for regional programs and her communications background offer expertise in using storytelling as outreach to engage allies and participants.

Jesse, Juie, Meg, and Peter have developed this Synergy Forum to explore innovations as well as shed light on challenges for effective outreach with participants. They hope you join live and participate to help all succeed in outreach.

Resources from past Workforce Synergy Forums (under the Workforce Synergy Forum filter)

What is the Workforce Synergy Forum?

As leaders of workforce programs, we all face similar opportunities and thrive by asking questions, sharing practices, and learning from experts and peers. Workforce Synergy is a monthly forum that unites us to recognize, strategize and operationalize effective workforce practices. We will collectively build the synergy we want and need for our workforce system. Leaders are encouraged to attend live for active, real-time collaboration, networking, and direct Q&A.

Synergy Principles - (STEP-CC)

Safety

Trustworthiness and Transparency Empowerment, voice, and choice Peer support Collaboration and mutuality Cultural, historical, and gender inclusion

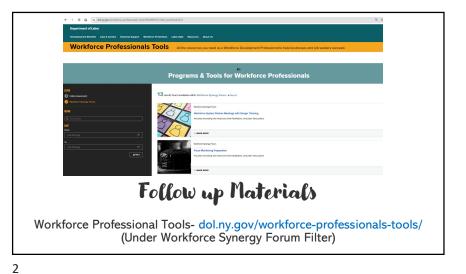


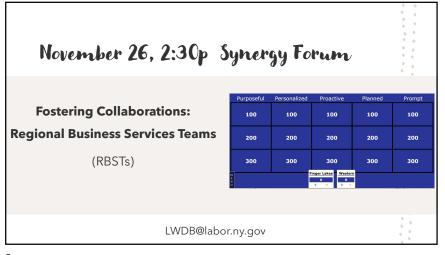
Inspired? Questions? Collaborate! LWDB@labor.ny.gov | 518-457-3555

Brought to you by the Local Workforce Leaders and New York State Department of Labor



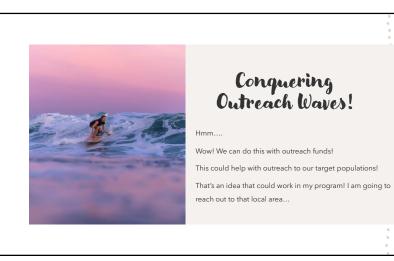




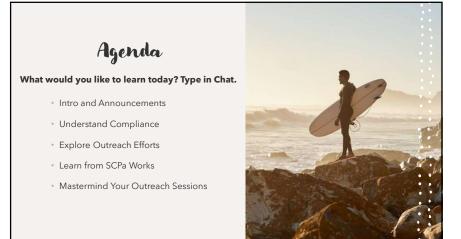


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Legal Reasons for Outreach

To fully communicate the workforce system's value and expand awareness of its services to job seekers and employers, the system must conduct effective and targeted outreach.

WIOA requires grantees to inform the public about services, conduct proactive outreach to underserved populations, and make individuals aware of services that can support their employment needs.

TEGL 03-23



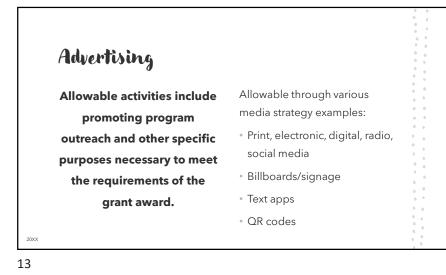


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Advertising

Allowable activities include promoting program outreach and other specific purposes necessary to meet the requirements of the grant award.





Public Relations

Activities that promote Federally funded activities, services, and programs, and are typically personnel costs.



14

Public Relations

Activities that promote Federally funded activities, services, and programs, and are typically personnel costs.

Public Relations examples:	
attendance at, facilitation of,	
collaboration with, or participation	•
in job/career/community fairs,	
rapid response events, one-stop	
satellite centers/mobile one-stops,	
community access points, high	
school/college career day,	
podcasts and other interviews, etc.	



Advertising and Public Relations are Allowable

While advertising of Federally funded activities, services, and program offerings might be present at a public relations event, public relations differ from advertising in that staff typically interact directly with the community, public, or press during public relations activities.

Advertising and public relations are an allowable outreach cost for grant activities, services, and programs.



Compliance

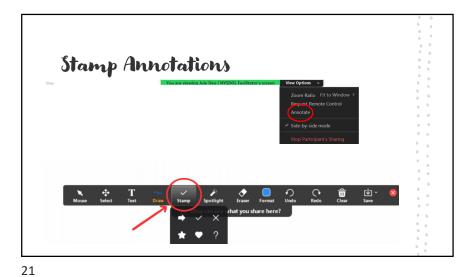
How will you be able to evaluate whether chosen the outreach effort is effective?

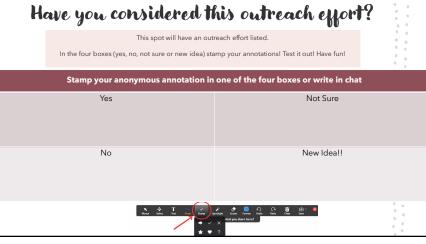
If costs are to be shared with other funding streams, are costs being allocated properly?

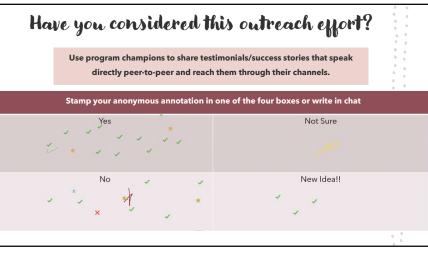


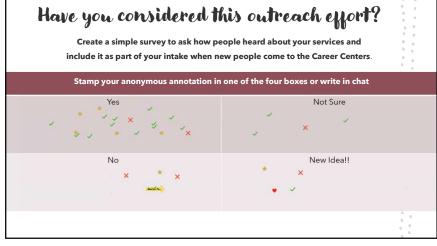


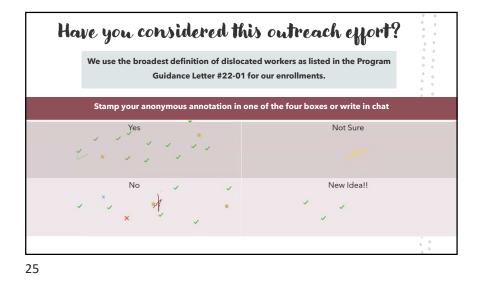


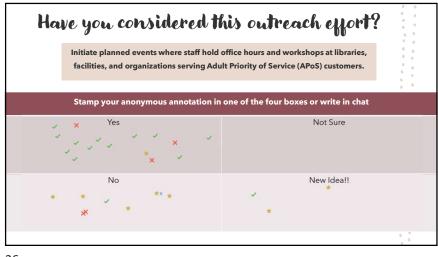


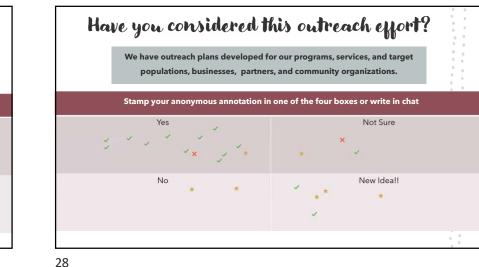


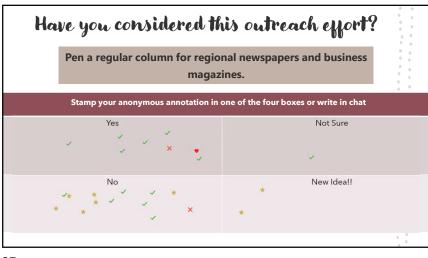








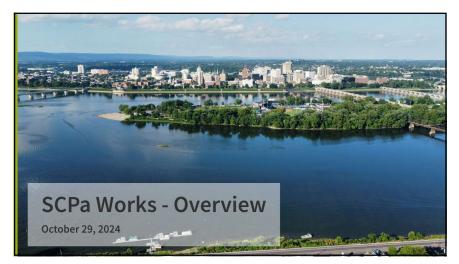




Create a simple survey to ask how people heard about your services and include it as part of your intake when new people come. Use program champions to share testimonials/success stories that speak directly peer- to-peer and reach them through their channels. We use the broadest definition of dislocated workers as listed in the NYSDOL Program Guidance Letter #22-01 for our enrollments. Initiate planned events where staff hold office hours and workshops at libraries, facilities, and organizations serving Adult Priority of Service (APOS) customers. Pen a regular column for regional newspapers and business magazines. We have outreach plans developed for our programs, services, and target We have outreach plans developed for our programs, services, and target populations, businesses, partners, and community organizations. Not Sure 3	Our Responses: Have You Considered This Outread		
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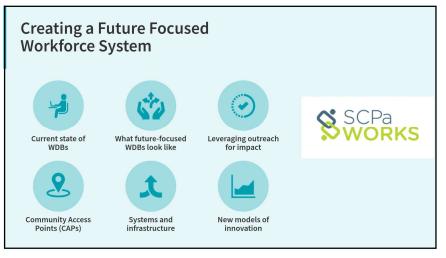
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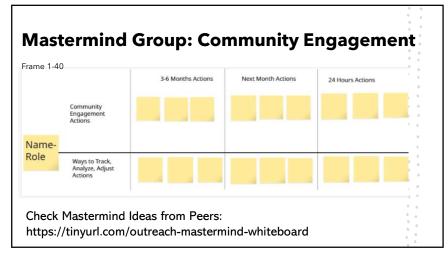
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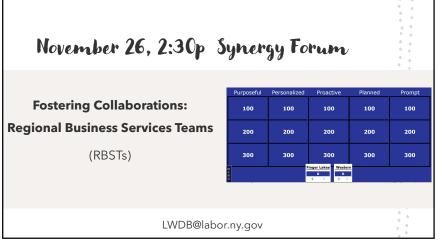






Check Mastermind Ideas from Peers: https://tinyurl.com/outreach-mastermind-whiteboard





Outreach Brief

This document serves as a brief, or a training supplement, for Local Workforce Development Boards (LWDBs) to develop an outreach plan for Workforce Innovation and Opportunity Act (WIOA) programs. The brief was developed for the Workforce Synergy Forum and related Mastermind Groups on this topic, with local workforce leaders and the New York State Department of Labor (NYSDOL).

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WIOA requires LWDBs to:

- Inform the public about services;
- Reach out to underserved groups; and
- Connect individuals and businesses with services that support their employment needs.

LWDBs can use WIOA funds to effectively and equitably conduct outreach to meet the needs of, and better engage, individual and business customers. Outreach activities promote our services and programs to educate, enroll, employ, or extend referrals to individuals and businesses. Effective, targeted outreach showcases the workforce system's value to the community. Consider community and program needs when developing outreach plans.

CREATIVITY: EFFORTS FOR CONDUCTING EFFECTIVE OUTREACH

The below are tried and true outreach activities and efforts. Put your own spin on them and have fun making connections! As your reach grows with these simple, no/low-cost activities, your overall vision for outreach and marketing may expand. With this, you might start thinking about dedicating more resources (time and money) to outreach and marketing. Remember, NYSDOL Fiscal Monitors are an available resource to help determine if specific costs are allowable.

(1) Community Engagement

Become a thought leader. Local radio stations and newspapers often look for stories and are happy to run provided content.

- Instead of paying for a radio ad, ask for a bi-weekly or monthly spot to talk about labor market information and the state of the local economy. If the station insists on paid time, find business partners to sponsor the session and join as guests.
- Pen a regular column for regional newspapers and business magazines.

Join local clubs (e.g. Urban League, Kiwanis, or Rotary)

 If the membership costs are too steep or the time commitment too high, become acquainted with club leadership and ask to get on their presentation schedule. This will give you a platform to share other services, such as Northstar digital literacy, and meet new community partners.

Use social media to create new, and expand existing, community partnerships.

- Seek out and "like" pages of community partners, like local recreation departments, food pantries, social services, and faith groups. Introduce ourself via a direct message on the social media platform. Share their content on your pages and ask them to share yours.
- Piggyback off programs and events that are relevant to your own. Consider sponsorship opportunities if partners are already doing significant outreach to similar audiences.

(2) Business Customer Engagement

Create programs to recognize employers and award annual "Best Places to Work."

• Use the <u>U.S. Department of Commerce and Labor Good Jobs Principles</u> for a framework.

Leverage LWDB members to market services to their networks.

 Support LWDB members to try out your services such as on-the-job training (OJT), transitional jobs, or youth work experiences so they can eventually be the ambassadors of your programs and services.

Establish the team as a key advisor to the local Chamber of Commerce and economic development agencies.

- Invite their leadership to be on the LWDB.
- Volunteer to participate in real estate prospect tours, offer labor market information, and ask, "What can we do for you?" instead of sharing a prescribed menu of services.

Don't forget about small businesses.

- Ask, "What can we do to provide training to your current employees so you can retain them?"
- Convene quarterly learning series to present on key topics such as OJT and apprenticeship.

(3) Career and Training Services

Leverage existing relationships with businesses for reverse referrals.

EVOLVING OUTREACH EFFORTS!

Recruitment/enrollment is only one aspect of outreach.

As our staff, customers, businesses, and communities evolve, so must our outreach efforts.

Share your evolving outreach ideas with LWDB@labor.ny.gov and your peers.

 Promote OJT as a cost-saving opportunity for employers. Communicate to employers that they can refer their candidates to you. For example, we can help close the skills gap for candidates who are a good cultural fit for businesses but lack key required skills.

Create and distribute flyers with QR codes for specific programs.

- Send the QR codes to community newsletters, faith-based bulletins, etc.
- Post flyers at government office buildings, public libraries, Motor Vehicle offices, community and behavioral health centers, public housing, recreation hubs, or any place where people gather. Host pop-up job fairs at libraries or community centers. Use their social media channels to advertise ahead of time, and use a hook, such as free cookies, to generate traffic. Utilize heat maps to determine the locations of outreach.

(4) Adult Priority of Service (APoS) Populations

- Establish strong relationships with social services providers and use them as a primary referral source.
- Initiate planned events where staff hold office hours and workshops at organizations serving APoS customers, and invite these partners to bring their customers into Career Centers for tours and orientation.
- Establish multi-sector partnerships with key community organizations to provide comprehensive wraparound services to shared customers.
- Form partnerships with businesses willing to invest in their people and communities through OJT, transitional jobs, and other services.

(5) Out-of-School Youth

- Use program champions to share testimonials/success stories that speak directly peerto-peer and reach them through their channels.
- Go to college and career fairs at high schools and present viable options for noncollege-bound high schoolers. Obtain their contact info and curate email blasts tailored to the audience.
- Establish relationships with high school guidance counselors (they will be thrilled to hear from you!), and ask them to refer non-college-bound seniors to you.
- Encourage referrals from businesses and community partners you typically refer to for youth who need work readiness, training, job placements, etc.
- <u>Recruitment and Outreach Innovation (ROI) checklist</u> developed by youth professionals utilizing Positive Youth Development principles.

(6) Track Outreach

 Create a simple survey to ask how people heard about your services, and include it as part of your intake when new people come to the Career Centers. This will help determine what outreach strategies are working. Regularly analyze the info and revise your outreach strategies accordingly.

(7) Resources

- Outreach and Marketing for the Public Workforce Development System: Exploring the Possibilities!
- o Post, Like, Follow, Share! Using Social Media as an Outreach and Marketing Tool
- o <u>Elevate Your Outreach</u>

- <u>Resource guide for engaging employers by Jobs for Future</u> highlighting diverse (advising, capacity-building, co-design, convening, leading) roles businesses play to meet the talent needs of the community.
- Workforce Synergy Forum "Outreach! The Good, the Bad and the Ugly" and Resources at: <u>Workforce Professional Tools</u> (Under Workforce Synergy Forum Filter)

CORNERSTONE: STRATEGIES FOR OUTREACH EFFORTS

WIOA allows local areas to recruit personnel and program participants, and to engage businesses using WIOA funds. If any of the following questions are relevant to the local area, then the necessity of an outreach plan and funds is evident.

(1) **Program and Services**

- Do we need to enroll more individual and business customers, and if so, for which services and programs? (Check <u>Kids Count Data Book</u> and <u>Census Bureau</u>)
- Is our cost per participant reasonable?
- How can we spend our training funds effectively?
- What needs to be done to improve our priority of service requirements?
- Have we recruited personnel like our potential customers or with similar lived experiences?
- Have we considered cost-effective ways to create an online social media presence?
- Are community members aware of our services and programs?
- (Add other relevant questions) _____

(2) Community

- Does our community need our services? What fraction of priority of service populations from our community do we serve? <u>Get intel from the NYSDOL Data Center.</u>
- Are WIOA funds and services sufficient to meet our community's workforce needs?
- Have we consulted with appropriate community service groups about ways we may improve our outreach and services to various populations?
- Do we have volunteer ambassadors or champions in the community who promote our services, because of the quality of our services and programs?
- (Add other relevant questions) ______

(3) Individual and Business Customers

• What outreach network needs to be built to increase the social capital of individual and business customers, such as partners to refer to, support systems, and resources?

- How do our individual and business customers promote our programs and services?
- How can we use text messaging applications to reach customers better?
- What are ideas and suggestions for outreach from our targeted customers?
- (Add other relevant questions) ______

(4) Partners

- Which partner services can we leverage?
- Which services and programs meet our partners' goals to support the co-enrollment of customers?
- How can we encourage partners to amplify our online/social media presence?
- (Add other relevant questions) ______

(5) Assessments and Aspirations

- Do we aim to expand our organization's fiscal reach and impact within the community, potentially through non-WIOA programs and grants?
- What ideas and suggestions can we utilize from our internal staff?
- What have local areas of a similar size and demographics done for an outreach program? Has it worked for them?
- What does a local area with an effective outreach strategy look like? How can we identify them and find out what's working for them?

(Add other relevant questions) ______

DEVELOP AN OUTREACH PLAN!

All great plans start with generating ideas and then identifying the great ideas from the good ideas.

An outreach plan helps!

(5) Synergy Mastermind Group: Community, Business and Program Outreach Templates

The Mastermind Your Outreach Synergy Forum Group was an exploratory three-part series focused on peer-to-peer strategic planning and goal setting for outreach.

Outreach ideas discussed by Mastermind Group are listed on this **whiteboard.**

Outreach plan templates used by the Mastermind Group are on the following pages.

SYNERGY FORUM MASTERMIND GROUP

Mastermind Your Outreach

COMMUNITY ENGAGEMENT

Community Engagement Actions

Time Frame	Actions	Ways to track, and analyze, adjust actions
Within 3-6 months actions		
Within the Next month actions		
Within 24 hours actions		

SYNERGY FORUM MASTERMIND GROUP

Mastermind Your Outreach

B.U.S.I.N.E.S.S. ENGAGEMENT

B – Benchmark (Research and Preparation)

What resources can you utilize to prepare for your business outreach strategy?

U – Understand (Target Audience)

How can you comprehend the bottom-line needs of your target businesses?

S – Strategize (Outreach Strategies)

What are your short-term (24-hour, next month, 3-6 months) outreach goals?

I – Inform (Content and Messaging)

How have you refined your messaging to businesses?

N – Nurture (Follow-up and Relationship Building)

What strategies do you employ to build lasting relationships with businesses?

E – Evaluate (Evaluation and Adjustment)

How do you measure qualitative and quantitative success?

SS – Sustain and Strategize (Tips to Maintain Momentum)

How do you establish sustainable outreach efforts?

SYNERGY FORUM MASTERMIND GROUP

Mastermind Your Outreach

TARGETED PROGRAM OUTREACH

Program Type:

Name:

Audience: What are their key characteristics and demographics?

Location: Where is our target audience typically concentrated?

Assets: How can Participants, Program Ambassadors, and Staff individually contribute to outreach efforts?

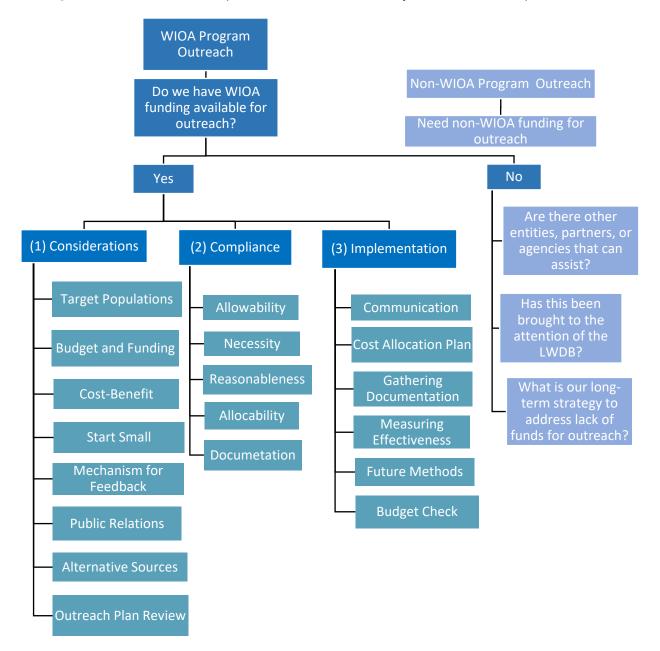
Action Plan: What are our 3-6 month, next month, and 24-hour outreach goals?

Indicators: What metrics will we use to assess and refine our outreach strategy regularly?

COST-EFFECTIVENESS FOR OUTREACH

Identify the funds you can use for the outreach plan. As you finalize your outreach activities, their cost-effectiveness can be evaluated. When using WIOA funds for outreach, the following cost-effectiveness decision tree offers a snapshot of:

- (1) Considerations Recommended fiscal matters for planning outreach efforts;
- (2) Compliance Fiscal requirements for finalizing outreach activities to implement; and
- (3) Implementation Fiscal steps when an outreach activity is finalized for implementation.



(1) Considerations: Fiscal Recommendations Outreach Efforts

- **Targeted Populations:** Who are we outreaching to? This will target our audience and aid with supporting the allocation of expense.
- Budgets and Funding: What should we budget for this outreach method? Consider the cost vs. benefit of the expense. Does the LWDB need to modify the budget to shift funds internally? If funds are moved, what outreach needs will be addressed? Is the local area spending lower or higher than expected? For example, do we still have a substantial amount of unobligated and unspent funds for the Program Year? What do we need to support the allocation of WIOA funds for outreach for specific programs, services, or target populations?
- Cost-Benefit: How do we consider cost vs. benefit? Project the effectiveness of reaching our audience and focus outreach efforts on communicating the necessary information to enlighten our target audience about what our program can do for them. A very expensive campaign may be fun and exciting, but if it doesn't bring people in, it was not a prudent use of funding.
- Start Small: Have we started on a lower scale to ensure that the chosen outreach method is effective and not only an experiment? For example, if we choose allowable promotional items, we shouldn't buy a large quantity; start small and see what works before making a large purchase to avoid excess inventory of unpopular promotional items.
- Mechanism for Feedback: How would we determine effectiveness or how will we
 measure if our outreach is successful? In the planning stages of outreach, consider what
 data we may be able to capture from our outreach to measure the effectiveness in a
 multitude of ways. This will help us plan future outreach efforts and over time we will
 build up awareness for what does or doesn't work.
- **Public Relations:** If choosing a marketing or social media contractor or influencer, have we thought about their reputation, their follower base, legal vetting requirements, potential participant receptivity, cost-effectiveness, and performance-based contracting?
- Alternative Funding Sources: If we take risks with our outreach, or want to supplement outreach, what other sources of funding are available to cover any costs that may not be allowable? Additionally, identifying alternative funding sources that may be available to cover potential disallowances also supports our outreach plan and budget.
- Outreach Plan Review: Have we checked with our Program and Fiscal Monitors for feedback on the outreach plan?

(2) Compliance: Details of Using WIOA Funds for Outreach

We must ensure our activities are allowable. An allowable expense of federal funds is:

• Necessary (2 CFR 200.403) to carry out the purpose of the federal award;

- Reasonable (2 CFR 200.404) in total cost such that under the same circumstances a prudent person would support funding the cost;
- Allocated appropriately (2 CFR 200.405) such that the cost is assigned in proportion to all benefitting funding cost centers based on a consistent and documented allocation method; and
- Supported by sound financial management (2 CFR 200.302) practices and records maintained, which include source documentation showing the amount and timing of the expense, as well as all required internal authorizations approving payment of the expense.

Allowability of Costs (overall):

What types of costs are not allowable? Understand the:

- Uniform Guidance, Office of Management and Budget Guidance at 2 CFR Part 200..400-200.476, Subpart E Cost Principles with Basic Considerations, General Provisions for Selected Items of Cost and specifically related to outreach, <u>2 CFR 200.421</u> on Advertising and Public Relations.
- <u>TEGL 03-23</u>: Allowable uses of Funds for Outreach Activities for Federal Formula and Competitive Grant Awards for guidance on allowability and outreach activities.

Necessity of Costs

- How is this cost necessary for the performance of the program and public relations?
- Will this cost assist the organization in achieving its grant's outcomes and goals?
- Does this cost adhere to the allowable expectations of both 2 CFR 200.403 and 2 CFR 200.421?
- Have all components of cost in our outreach plan been determined to be necessary?
- Have we conducted the required budget evaluation so we don't commit resources to outreach activities that our funding cannot support?

Reasonableness of Costs

- Have we analyzed the Reasonableness of Costs in accordance with 2 CFR 200.404?
- In the prudent person theory, our organization must consider:
 - a. Would a prudent person use federal funds to purchase such items?
 - b. Under the same conditions, if we were personally responsible for funding this cost for this purpose, would we have made the same decision to use our personal funds to fund this cost?
 - c. Do internal controls (Memorandum of Understanding (MOU)/Infrastructure Funding Agreement (IFA), policies, sub-recipient agreements, contracts, etc.) that designate/describe outreach activities and/or limits exist?

- d. Have we evaluated competitors pricing for this cost and determined our fee is reasonable based on market prices?
- e. Has this cost followed local policy (costs for incurring cost, seeking approval for cost, and following documented competitive procurement procedures) if necessary?

Allocability of Costs

- Have we made sure that the outreach communicates the name of the funding the customer will be served under to support cost allocation?
- Has cost been evaluated to identify the benefit funding sources to ensure that when cost is allocated, it is allocated to each funding source in accordance with the proportionate benefit received?
- Has the local cost allocation plan been applied consistently and correctly in the allocation of cost?
- Does the award have any funding limitations (dollar limit or percentage limit) for this type of cost that must not be exceeded?
- Have all local controls for cost allocation been followed to support the allocation of cost?

Supporting Documentation

Have we maintained the support or backup for the cost, which shows:

- We incurred the cost in accordance with local internal policies on incurring cost?
- Acquisition of all necessary approvals from all sources and levels to incur the cost (as applicable)?
- The price is competitively reasonable? Have we documented our Prudent Person decisions?
- What cost was incurred for including necessary details which support the calculation of the fee paid?
- The date or time period the cost was incurred to support the timing of the cash expenditure?
- Proof that the expense was paid and the method of payment?
- Required support for procurement in accordance with local procurement policy?

For allowability, which requires necessity, reasonableness, allocability, and source documentation to support cost, we encourage engagement with your NYSDOL Fiscal Monitor prior to incurring the cost so they can provide guidance on the outreach plan, as well as how to document support for the cost and maintain back-up documentation so that during your annual review you can show the cost was allowable. If our outreach activity is sizeable and requires publishing competitive procurement solicitations in accordance with local policy, we additionally recommend reviewing the local policy and developing an outline to ensure all required supporting documentation is maintained.

Other Intersecting Laws

Which other laws do we need to double check for outreach compliance? <u>Statutory and</u> <u>Regulatory Uniform Guidance Language Related to Outreach (TEGL 03-23, Attachment I)</u>:

- Accessibility, from Rehabilitation Act of 1973 sec. 508
- Acknowledging Federal Funding in Public Communications (Stevens Amendment)
- Advertising and Public Relations Costs, from 2 CFR 200.421, the Uniform Guidance
- o Affirmative Outreach, from 29 CFR 38.40
- Activities requiring procurement must follow and document procurement policy

(3) Implementation: Fiscal Steps for Implementing Chosen Outreach Efforts

- **Communication:** Is our outreach activity communicating the following?
 - a. Identity: Does the outreach explicitly state the name of the program(s) we are outreaching on behalf of?
 - b. Call to Action: Does the outreach effort communicate how the customer can access the services (i.e., a call to action to a physical address/mailing address, web address, phone numbers, or specific staff to assist them)?
 - c. Offering: In the most clear, concise, and direct way does the outreach communicate the core benefit of engaging with the program (long-term employment, training, upskilling, work experience exploration, etc.)?
 - d. Individual Benefit: Does the outreach campaign show the opportunity this program/service brings to the customer?
- Cost Allocation Plan: Have we identified the appropriate method for cost allocation in accordance with our local policy? Cost must be allocated to the source of funds that are benefitting. If our outreach is to a specific funded population (i.e., out-of-school youth), the expense would be funded with out-of-school youth funds.
- **Gathering Supporting Documentation:** Have we confirmed our documentation gathering process is following local policy to ensure we have supporting documentation, with all appropriate authorizations for all expenses incurred, including procurement (as applicable)?
- Measuring Effectiveness: Do we have a method to capture data on the effectiveness of our outreach efforts? Are we asking our customers how they learned about our services? Have we organized our collected data to determine which outreach method is working for us?
- Future Outreach Methods: Based on collected data, how do we plan to modify our outreach methods?
- **Budget Check:** Does the budget need to be modified to fund outreach?