

# CWP Policy and Procedure Manual

<b>Program:</b> Jobs First Employment Services	<b>Section:</b> 6-50
<b>Subject:</b> Subsidized Employment	<b>Effective Date:</b> 7/01/16

## A. General

CWP's general work experience policy and procedures in section 2-60.1 of the CWP Policy and Procedures Manual apply to the Jobs First Employment Services (JFES) subsidized employment activities. The policy and procedures in this section also apply to JFES subsidized employment activities and are specific to the JFES subsidized employment.

## B. Objectives

1. Provide paid subsidized employment to individuals with limited or no work history to increase their employment competency and competitiveness in the job market.
2. Improve long-term employment retention by providing a real-world employment experience that increases knowledge of the world of work and improves employment competency.
3. Create an incentive to work by offering limited paid work that will have no impact on cash benefits.
4. Provide employment performance review and feedback by worksite supervisors.
5. Provide an enhanced resume and positive employment reference.
6. Create the potential for an unsubsidized employment opportunity.
7. Facilitate the program goal of meeting the TANF work participation rate requirement.

## C. Target Population

JFES participants who are appropriate candidates for subsidized employment are active, time-limited JFES individuals:

1. With limited or no work history, defined as not working full-time (35 or more hours per week) for 13 consecutive weeks in the past 12 months; or
2. Who have not been successful in obtaining employment through job placement activities with a CWP contractor or with CT DOL; or
3. With occupational skills acquired through training but with limited work history; and
4. With a satisfactory attendance and performance record in other activities.

## D. Additional Consideration

In addition to the criteria listed in C.1. above, the following factors must be considered in determining if subsidized employment is the most appropriate activity for a JFES participant.

1. Generally, the participant's TFA counter should be less than 18 months. Participants with a TFA/JFES counter between 18 months and the first month of their first or second extension are only considered for subsidized employment on a case-by-case basis.
2. When combined with other work-related activities such as education, training, community service, or job search/job readiness/job development does subsidized employment meet the program requirements and individual participant's needs.

## E. JFES Subsidized Employment General Guidelines (The contractor is the employer of record)

1. Subsidized employment participants are hired as employees of the contractor who serves as the employer of record.
2. Subsidized employment participants are paid minimum wage and associated fringe and benefits (FICA, workers compensation, and unemployment insurance as applicable).
3. The contractor maintains payroll records for JFES participants, including records of time actually worked as verified by supervisors.

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4. The contractor ensures that participants are evaluated by worksite supervisors. The contractor will encourage and assist worksite supervisors to provide regular feedback to participants and to contractor staff.
5. The contractor staff who is responsible for the worksite placement notifies JFES case management staff immediately when intervention is needed to ensure participant progress and success at the worksite.
6. When possible, the contractor requests that the worksite provide a letter of reference for each participant who successfully completes a subsidized employment assignment.
3. Generally, JFES participants are assigned to subsidized employment for 20 hours per week; each participant’s work schedule is determined individually, with careful consideration given to keeping income under the Federal Poverty Level during the first 21 months and up to the TFA Payment Standard (plus the \$90 earnings disregard) during an extension - while ensuring the 35 hour work participation requirement is met. This is the responsibility of case management staff.
4. Other employment plan activities are combined with subsidized employment to in such a way to ensure that the participant remains engaged in at least 35 hours per week of countable work activity. The work schedule is to be flexible enough to allow for participation for total of 35 hours of work activity.
5. The Contractor records all Employment Plan activities in the required data/case management systems as required by CWP.
6. JFES participants are placed into subsidized employment for as long as resources remain available. Subsidized employment vacancies should be “back-filled” to the greatest extent possible.
7. Subsidized employment earnings must not exceed the payment standard for the participant’s family size. The chart below shows the maximum hours when the only hours assigned are at minimum wage which is currently \$10.10/hour. Potential earnings must be recalculated when the Connecticut minimum wage increases. In such cases, fewer than 20 hours of subsidized employment are assigned but are combined with additional core work hours to result in a total of 35 countable participation hours.
8. Contractor coordinates with DSS to identify child support payments, and to verify that subsidized earnings in combination with child support will not affect participants’ eligibility for TFA benefits.

**Maximum hours assigned when TFA counter is at/above counter 18 by family size**

# of family members	maximum hours per week
1	10
2	13
3	15
4	18
5	20

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## **F. Selection of Worksite Assignment**

Contractor reviews the participant's assessment results and employment plan to determine the appropriate worksite assignment for the participant based skill level assessment and interests.

Factors to be considered when placing a participant into subsidized employment include:

1. relevance of the job to the occupation in which the participant has been trained, if any;
2. relevance of the job to the participant's occupational and career goals;
3. participant's ability to engage in the specific subsidized job (child care in place during work hours, transportation available, participant has job-specific qualifications such as the ability to pass criminal background check, no record with DCF, etc.)

When the subsidized job is at a community service host agency, the Contractor shall ensure that the paid job is at a higher level of responsibility than the community service position.

## **G. Worksites**

1. CWP contractor's JFES staff establish worksites, develop worksite job descriptions and Worksite Agreements, orient the worksite supervisors to the JFES subsidized employment, and ensure timely and accurate submission of participant time records for payroll processing.
2. A completed and signed Worksite Agreement between the CWP's JFES contractor (the employer of record) and the worksite employer must be executed prior to placement of participants at a worksite.
3. Worksite employers complete and sign the "Employer Release of Confidential Data" form prior to placement of participants with the employer.

## **H. Worksite Agreements**

1. The worksite agreement must be recorded on the template provided by CWP.
2. The worksite agreement includes a job description for each subsidized employment position and identifies the worksite supervisor.
3. Information on the worksite employers is entered and maintained in the CWP's data system. Worksites are added as new sites are developed and agreements are signed.

## **I. Participant Agreements**

1. Participant agreements must be in place prior to placement at a worksite and be recorded on the template provided by CWP. The participant agreement template may be tailored, as needed.
2. Designated JFES staff ensure that participants are familiar with the job description on the participant agreement and agrees to adhere to appropriate workplace behaviors.
3. Designated JFES staff ensure participants are familiar with their role and responsibilities related to their job on the worksite.

## **J. Duration of Subsidized Employment**

Participants are generally assigned to a minimum of 4 weeks of subsidized employment. Whenever a participant does not complete the assigned weeks at a worksite, another participant is assigned to the worksite to ensure that subsidized employment resources are fully utilized.

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### **K. Wrap-Around Services**

Contractor staff are responsible for ensuring that child care and transportation services are in place in order for the participant to work at the assigned subsidized employment worksite. Participants may receive training through other programs funded by CWP or by other sources such as the public schools, prior to or concurrent with a subsidized employment activity.

### **L. Post-Subsidized Employment Follow-up**

As with all other JFES participants, JFES subsidized employment participants' employment plans are developed and modified as needed with the goal of becoming independent from cash assistance. Follow-up activities may include referral to training programs, use of AJC center resource library and workshops, continued attendance at adult education, voluntary community service at non-profit worksites if approved by the host agency and combined with job placement activity.