

# CWP Policy and Procedure Manual

## **Section 3 – WIOA Adult Policy**

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## A. Purpose

To provide the criteria for determining eligibility for the array of WIOA Adult-funded services available to customers of the American Job Center (AJC) system.

## B. Definitions

**Basic Skills Deficient:** WIOA Section 3(5)(B) An adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society. Defined by CWP as having a CASAS reading score of 235 or less and/or a CASAS math score of 235 or less.

**AJC Career Services** (20 CFR 678.430 and CTDOL WIOA Policy Manual Section 16):

**Informational and Self-Directed Basic Career Services:** Self-directed services occur when individuals independently access the AJC system information in either a physical location or remotely via the use of electronic technology. Informational and self-directed basic career services may include a general orientation to the services available within the AJC system, and assistance to customers who independently utilize the self-directed services available in the Career Resource Center which may include access to printed materials and online job search resources.

**Staff-Assisted Basic Career Services:** Staff-assisted basic career services are more substantial than the services provided to self-directed customers. The provision of staff-assisted basic career services includes services such as initial assessment of the customer's education level, work history, skills, interests, aptitudes to determine appropriate level of service, assistance with job search and placement, provision of information on nontraditional employment and in-demand occupations, resume development, facilitation of workshops including workshops on available training resources, and, when appropriate, the determination of eligibility for individualized career services and/or training services.

**Individualized Career and Training Services:** Individualized career and training services are more intensive than the services defined as "Staff-Assisted Basic Career Services" and are designed for customers who have been determined eligible and meet the priority of service criteria for individualized career and/or training services. See section C. Policy for eligibility and priority of service criteria. The provision of individualized career and training services includes comprehensive and specialized assessments and the development of an individual employment plan (IEP), group and/or individual career counseling and mentoring, career planning, short-term pre-vocational services, internships and work experience linked to careers, workforce preparation activities including online learning, financial literacy services, out-of-area job search and relocation assistance, English language acquisition and integrated education and training, and occupational skills training.

**Dependents:** As defined by 20 CFR 675.300 and U.S. Internal Revenue Service (IRS), dependents are two or more persons related by blood, marriage or decree of court, who are living in a single residence, and are in one or more of the following categories: 1. Married couple & dependent children, 2. Parent(s) or guardian & dependent children; or Married couple. A dependent child is

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defined as younger than 19 years or a student who is younger than 24 years by the end of the calendar year or permanently & totally disabled.

**Eligible Spouse of a Veteran:** A current spouse of a veteran (as defined in these definitions) or the spouse of any of the following as defined by section 2(a) of the JVA (38 U.S.C. 4215[a]): any veteran who died of a service-connected disability or who died while a service-connected disability was in existence, any member of the Armed Forces serving on active duty who, at the time of application for the priority, is missing in action; captured in line of duty by a hostile force; or forcibly detained or interned in line of duty by a foreign government or power, or any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs.

**Family:** Family includes parents and dependents as defined by 20 CFR 675.300 and U.S. Internal Revenue Service (IRS). See definition of dependent in this policy section.

**Federal Public Benefits** (8 U.S.C. § 1611(C)): Services limited to **Qualified Individuals**. This includes certain supportive services that represent a direct financial benefit (such as a voucher or reimbursement for transportation and childcare, relocation expenses, or needs-related payments), post-secondary education and training, and work-based learning such as on-the-job-training and incumbent worker training.

**Homeless Individual** (as defined in Section 41403(6) of the Violence Against Women Act of 1994): An individual who lacks a fixed, regular, and adequate nighttime residence and includes:

1. An individual who is:
  - a. sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason
  - b. living in a motel, hotel, trailer park, or campground due to the lack of alternative adequate accommodations
  - c. living in an emergency or transitional shelter
  - d. abandoned in a hospital
  - e. awaiting foster care placement
2. An individual who has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings; or

**Individual with Disability:** Any individual who identifies as having a disability as defined in the Americans with Disabilities Act of 1990, as amended, Title 42, Chapter 126, Sec. 12102. A disability is a physical or mental impairment that substantially limits one or more major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment (if the individual establishes that he or she has been subjected to an action prohibited under this chapter because of an actual or perceived physical or mental impairment whether or not the impairment limits or is perceived to limit a major life activity).

**Low Income Individual** (CTDOL WIOA Manual Section 17 II.A.1): An individual who with total income, or who is in a family with a total income, that does not exceed 70% of the lower living standard income level (LLSIL); or who is a homeless individual (as defined in Section 41403(6) of

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the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6)); or who is an individual with a disability whose own income meets the income requirement, but who is a member of a family whose income does not meet this requirement; or who receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program (SNAP), Temporary Family Assistance (TFA), Supplemental Security Income or other State or local income-based public assistance.

**Offender** (WIOA 3(38)): An adult or juvenile:

1. Who is or has been subject to any stage of the criminal justice process, and for whom services under this Act may be beneficial; or
2. Who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

**Qualified Individuals:** Individuals participating in programs and activities or receiving funds under Title I of WIOA who are citizens and nationals of the US, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized to work in the United States (WIOA 188(a) (5)). TEGL 10-23 refers to “qualified aliens” (8 U.S.C §1641(b)) as “qualified” individuals or “qualified” non-U.S. citizens or non-U.S. nationals. Qualified Individuals are eligible to receive **Federal Public Benefits**.

**Recipient of Public Assistance:** Individuals who are recipients of public assistance or is a member of a family that receives local, state or federal assistance including Temporary Family Assistance (TFA), Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), Social Security Disability Insurance (SSD), State Administered General Assistance (SAGA), HUSKY Health and Refugee Cash Assistance (RCA).

**Veteran:** A person who served in the active military, naval, or air service, and who was discharged or released therefrom under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).

### C. Policy

CWP is committed to providing effective services to all customers in response to their needs and is accountable for achieving positive performance outcomes for customers at all service levels. Employment-related services are available to all adult job-seeker customers through the AJC system regardless of their point of entry. The services available to adult customers at the AJC are defined in section B. Definitions above. The intensity of the services provided depends on the customers’ employment-related needs and eligibility status in accordance with the criteria described below.

1. WIOA Adult Eligibility & Priority of Service Criteria for AJC Services (20 CFR 680.600 & 680.650)
  - a. Informational and Self-Directed Basic Career Services are available to anyone who uses the AJC system without having to meet WIOA eligibility requirements and without registering in AJC case management data system.
  - b. Staff-assisted Basic Career Services are available to customers of the AJC system who are determined by AJC staff to meet WIOA Adult program

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eligibility criteria and are registered in the AJC case management data system. To be eligible for WIOA-funded staff-assisted basic career services, a customer must meet the following criteria:

- i. Be a US Citizen or Authorized to Work in the US.
  - ii. Meet Selective Service Registration requirements, if applicable,
  - iii. Be 18 years of age or older, and
  - iv. Resides or works in the North Central Region
- c. Individualized Career and Training Services are available to customers of the AJC system who are determined by the AJC staff to:
- i. Meet WIOA Adult eligibility criteria described in section C.1.b above; and
  - ii. Are unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment and have the skills to benefit from more intensive services and/or training; and
  - iii. Meet one of the following priority of services criteria in this order:
    - a) Veterans who served in the active military, naval, or air service, and who were discharged or released therefrom under conditions other than dishonorable.
    - b) Non-veterans who meet any of the following criteria: (see section B for definitions):
      - 1) Recipient of public assistance
      - 2) Other low-income individuals
      - 3) Individual who is basic skills deficient
      - 4) Individual with a disability whose income meets the low-income criteria, regardless of total family income
      - 5) Offender
2. Priority of service criteria is applied only when a customer is determined by AJC staff to need WIOA Adult-funded Individualized Career Services or Training.
  3. WIOA customers who do not meet priority of service criteria may continue to receive Staff-assisted Basic Career Services.
  4. Applications for WIOA-funded Staff-assisted Basic Career Services and Individualized Career and Training services are processed within ten (10) calendar days from the date of application.
  5. If the applicant is not enrolled within ten (10) calendar days and the applicant still wants services, a new application must be submitted.
  6. During the eligibility process, program staff document and record barriers that are identified during the eligibility process in the case management data system (See section D. below for details).
  7. Supportive services may be provided if an applicant requires assistance obtaining eligibility documentation (See section G below for details).

### D. Procedures

1. Customers who are interested in Staff-assisted Basic Career Services and/or Individualized Career and Training Services, create an account in the case management data system.
2. Designated AJC staff review the pre-application including any uploaded eligibility documentation

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and contact the applicant to discuss next steps which include completing an orientation session (virtual), scheduling an intake appointment (date, time and place), whether the appointment will be in person or virtual and the review and/or submission of any additional documentation needed to determine WIOA eligibility.

3. If the applicant does not respond to the attempt to schedule an intake appointment, staff will make 2 additional attempts at contacting the applicant regarding attending an intake appointment. If the applicant continues to be unresponsive, the application will be closed.
5. If the applicant is not enrolled within ten (10) calendar days and still wants services, a new application must be submitted.
6. The status of the application including the date of the intake appointment, how eligibility was initially determined and what documents were observed or provided, and any details regarding repeated attempts to contact the applicant are entered into the applicant's record within two (2) business days of occurrence.
7. If there are barriers to determining eligibility, staff are to document and record barriers identified during the eligibility process in the case management data system (See CWP Policy 3-15 Barriers, section B.1. and Policy 3-60 Supportive Services, section B.4 for more details regarding addressing and documenting barriers to the intake process).

### E. Documenting Elements of WIOA Program Eligibility

As much eligibility criteria as possible must be verified at intake without creating undue administrative burden on the participant and delaying delivery of services. Only the minimum physical documentation required for eligibility determination is required to be uploaded to the case management system designated for the WIOA Adult program. In many instances, the documentation may be gathered at later dates or substituted with equivalently acceptable documentation. When working with populations facing challenges in document access, self-attestation and/or the use of partnering data systems where data verification already exists is strongly encouraged. A physical copy of self-attestation and/or verification documents obtained from partners is not required, and use of these systems to verify eligibility should be clearly documented in case notes.

#### 1. Authorization to Work

An applicant verifies authorization to work by presenting acceptable documentation that establishes both identity and employment authorization in accordance with the US Citizenship and Immigration Services (USCIS). The USCIS issues guidance on acceptable documentation for both identity and employment authorization. **An individual cannot self-attest their work authorization status;** these documents must be presented. Case managers are not required to upload physical copies but should record what documents were presented in case notes. See USCIS Form I-9, List of Acceptable Documents and M-274, Handbook for Employers in the Appendix of this manual for detailed information and examples of acceptable documentation to establish identity and work authorization.

Many services can be delivered without proof of the participant's work authorization (TEGL 10-23), including:

- a. Labor exchange services such as labor market information, career exploration, career

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- guidance, resume writing assistance, and job search assistance
- b. Information on worker rights and where to find legal assistance
- c. Referrals to community resources such as such as transportation, childcare support, food assistance, housing assistance, medical assistance, and other similar resources
- d. Individualized services such as career assessments, development of an individual employment plan, group counseling, one-on-one case management, career planning, information on foreign credential evaluation services on obtaining credit for prior learning
- e. Basic skills education, including English language instruction, and high school equivalency
- f. Assistance in completing paperwork to finalize work authorization
- g. Assistance in applying for an occupational license including the cost of such applications
- h. Outreach to workers regarding the Employment-Related Law Complaint System and processing of such complaints.

The following services are considered Federal public benefits and are limited to qualified individuals. WIOA funds may not be used to provide these services until a participant can show verification of work authorization documentation. These services include:

- a. Supportive services that represent a direct financial benefit, such as voucher or reimbursement for transportation and childcare, relocation expenses, or needs-related payments
  - b. Post-secondary education and occupational training
  - c. Work experience and work-based learning such as on-the-job training and incumbent worker training.
2. Selective Service Registration
- All male applicants who are the ages of 18 through 24 who are required to register with the Selective Service under the Military Selective Service Act must register as a condition of eligibility. Prior to being enrolled in a WIOA-funded program, all male applicants born on or after January 1, 1960 who are not registered with the Selective Service and have not reached their 26th birthday must register through the Selective Service website at <http://www.sss.gov>. For more details regarding selective service requirements see CWP Policy Manual Section 2-40 or the Selective Service website at <http://www.sss.gov>. Documentation of Selective Service registration includes:
- a. Selective Service Acknowledgement letter
  - b. Form DD-214 "Report of Separation"
  - c. Screen printout of the Selective Service Verification on the Selective Service website at <http://www.sss.gov>. For males who have already registered this website can be used to confirm their Selective Service number as well as the date of registration, by entering a last name, social security number, and date of birth.
  - d. Selective Service Registration Card
  - e. Selective Service Verification Form (Form 3A)
  - f. Stamped Post Office Receipt of Registration

3. Age

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Any government issued document containing the applicant's date of birth such as a passport, birth certificate, driver's license, State ID, and school record.

#### 4. Resides or Works in the North Central Region

To receive WIOA Adult-funded Staff-assisted Basic Career Services or Individual services through CWP, an applicant must reside or work in one of the 37 towns in the North Central region (see list of NC region towns at <https://capitalworkforce.org/town-profiles/>).

- a. An applicant verifies residency by presenting documentation that contains both their name and address. Examples of documents that verify residency include but are not limited to:
  - i. A government or school issued ID (if expired, within 30 days of expiration date)
  - ii. A post-marked envelope addressed to the applicant
  - iii. A bank statement or bill
  - iv. Rental agreement

Documentation such as bank statements or bills may have been received through the mail or printed from online accounts. If the applicant has no documentation of residency but resides with someone who does have documentation of residency, that documentation plus a letter from the other person with whom they reside stating that the applicant resides with them at their address will be accepted as documentation. Documentation of residency must be dated within the six (6) months prior to the application date.

- b. When an applicant does not reside in the NC region but works in one of the towns in the NC region, the applicant verifies the location of their employment with any documentation that shows that they are employed at that location such as a paystub, employee ID or letter from their employer.

#### F. Documentation of Priority of Service Criteria

##### 1. Recipient of Public Assistance

- a. Paper documentation: Any document from the issuing authority showing that the applicant received public assistance such as SNAP, TFA, State General Assistance, refugee cash assistance, or HUSKY Health in the last six (6) months. Paper documentation is preferred.
- b. If the applicant is unable to obtain paper documentation of SNAP or TFA receipt, AJC staff with authorized access to DSS's eligibility database may verify the WIOA applicant's SNAP and/or TFA eligibility through the DSS eligibility database. AJC staff document the status and dates of receipt of SNAP and/or TFA from the DSS database by creating a case note in the applicant record. Access and use of information from DSS's eligibility database is limited to facilitating the determination of priority of service for WIOA-funded employment services. AJC must not redisclose or reproduce information from DSS's eligibility database. (DSS/DOL MOU executed 4/10/23)

##### 2. Other Low-Income Status

If the applicant is not a recipient of public assistance but has income or is a member of a family with a total family income that does not exceed the poverty line or 70% of the lower living standard income level (See LLSIL chart in the Appendix of this manual), the CWP Family Income Statement is completed with documentation of income such as paystubs to determine annual income (see Section 8. Forms of this policy manual for Family Income Statement form). For



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detailed instructions for various methods of determining and documenting income see Annualized Income Methods in the Appendix of this manual. If there is no income and/or the applicant qualifies as a homeless individual, the applicant completes Self-Attestation form (See Section 8. Forms of this manual for Self-Attestation form).

3. Basic skills deficiency or English language learner  
Most recent CASAS assessment administered within the last 12 months. A CASAS reading or math scaled score of less than 235 is evidence of a basic skills deficiency.
  4. Disability  
Documentation of SSI/SSD such as an award letter or a completed Self-Attestation form (see Section 8. Forms of this policy manual).
  5. Offender  
Court records (including online records), documentation or letter from criminal justice system, referral from reentry program. If the applicant is unable to obtain documentation, they can attest to the offender status on the Self-Attestation form.
  6. Veterans and Eligible Spouses (TEGL 23-19 Change 2)  
Documentation of veteran or eligible spouse status (see Section B for definitions) beyond self-attestation is only required at the point in which eligibility for individualized career and training services are determined. Documentation of veteran or eligible spouse of a veteran is:
    - a. Form DD-214 Report of Separation
    - b. Other documentation from the Veterans' Administration of the veteran's statusThe lack of a DD-214 cannot be used to deny services. If the applicant who is a veteran does not have documentation, AJC staff assists them to contact the local or State veterans' staff to obtain a copy of form DD-214.
- G. Assistance with Obtaining Eligibility Documentation** (CTDOL WIOA Policy Manual Section 36 4)
1. If it is determined that an applicant, who appears to be otherwise eligible, does not have the resources to obtain the required documentation, the applicant may self-attest to the required eligibility factor and be certified based on the self-attestation.
  2. Once they are certified, supportive services payments can be used to assist with obtaining the documentation. Supportive Services can be used to pay for the expenses related to obtaining required WIOA eligibility documentation as long as the participant is otherwise eligible and self-attests to program eligibility pending receipt of documentation.
  3. Eligibility elements that require documentation (the use of self-attestation is only temporary until documentation is obtained) include:
    - a. US Citizenship or authorization to work in the United States. A participant cannot self-attest to work authorization but can still receive many services without proof of work authorization. See section E.1 of this policy for more details.
    - b. Selective Service Registration

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- c. Other categories as deemed necessary where self-attestation is not acceptable by CT DOL or under federal law, regulations and USDOL guidance.
4. Program provider staff assist the participant to obtain the documentation, to the extent possible. Documentation of required eligibility elements must be obtained prior to enrollment in training and/or program exit.
5. If eligibility documentation proves the individual is ineligible for WIOA or if the documentation is not acquired before the exit date, CWP is notified immediately.
6. The primary responsibility for providing documentary evidence rests with the applicant/participant.
7. All required documentation of eligibility must be uploaded to the participant's record in the case management data system designated for the WIOA Adult program.

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<b>Subject:</b> Barriers - Documentation and Recording	<b>Effective Date:</b> 07/01/20	

## A. Policy

In order to ensure successful employment-related outcomes for WIOA program participants, it is CWP's policy that all WIOA participants' barriers to employment be identified during the intake process, addressed to the extent possible, documented and recorded in CTHires. Any time during the continuum of service a participant discloses that he/she has or had a barrier to employment that existed at the time of WIOA enrollment, the barrier is to be documented and recorded in CTHires by the supervisor.

## B. Procedures:

To maintain performance, accountability and the continuity of service, it is necessary that WIOA program staff document and record barriers in CTHires according to the following procedures.

1. During WIOA intake process:
  - a. WIOA program staff identifies all barriers to employment.
  - b. If known, the barrier's initial date of onset is noted.
  - c. Staff requests that the participant submits documentation to verify the barrier(s) and the date of onset, if possible (see Section C. Documentation below).
  - d. Once the documentation is submitted, WIOA-program staff records the barrier and uploads the scanned documentation into CTHires.
  - e. The WIOA application is not held up for documentation of barriers beyond that which is needed to determine eligibility. However, staff continues to pursue documentation on any additional barriers to record and upload it into CTHires.
  - f. Staff determines if the participant is co-enrolled in the Wagner-Peyser (WP) program with a WP application date that is prior to WIOA enrollment. If the participant is an active WP participant and has a documented barrier that existed at the time of the WP application but was not recorded and documented in CTHires, the WIOA staff supervisor follows local procedures to inform the WP staff to add the barrier to the WP application in CTHires.
2. During on-going case management:
  - a. After enrollment, if during subsequent communications, the WIOA participant reveals to the WIOA staff that he/she has a barrier to employment that existed at the time of WIOA intake, WIOA staff pursues documentation of the barrier (see Section C. Documentation below) including verification of the date of onset.
  - b. Once the documentation is acquired, the WIOA staff's supervisor records the barrier as an enrollment element in CTHires and uploads the documentation.
  - c. Staff determines if the participant is co-enrolled in the Wagner-Peyser (WP) program with a WP application date that is prior to WIOA intake. If the participant is an active WP participant and has a documented barrier that existed at the time of the WP application but was not recorded and documented in CTHires, the WIOA staff supervisor follows local procedures to inform the WP staff to add the barrier to the WP application in CTHires.
  - d. WIOA staff proceeds with addressing the barrier to the extent possible.

## C. Documentation

All barriers to employments that are recorded in CTHires must be supported with documentation that is uploaded to CTHires. Examples of documentation of barriers include government assistance

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records, state judicial records of offender status and self-attestation from the participant on the CWP self-attestation form. Whenever necessary, the WIOA staff are to assist participants to acquire documentation of a barrier such as researching online public records such as judicial department records and providing the participant with the self-attestation form when there is no other way to acquire the documentation.

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## A. General Provision

Internship is a Career Service identified at WIOA Section 134(c)(2)(A)(xii)(VII). Adult internship is defined at § 680.180 as a planned, structured learning experience that takes place in a workplace for a limited period of time. Internships and other work experience may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. An internship or other work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience setting where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.

## B. Purpose

This policy defines the purpose and parameters of internships with employers that directly hire interns and serve as their employer of record. Internships for which CWP service providers serve as employer of record are governed by CWP policy 02-60: Work Experience.

The purpose of internships for adults is to provide experience in and exposure to careers in a specific industry sector aligned with the career goals identified in the participant's Individual Employment Plan.

## C. Policy and Procedures

### 1. Participant Eligibility

Participants must be enrolled in the WIOA Adult program, actively engaged with American Job Center services and referred by an American Job Center representative.

### 2. Participant Suitability

Participants must demonstrate the skills required by the employer, through successful progress in or completion of related occupational training or possession of a related certification or credential.

### 3. Employer Eligibility and Suitability

Employers are to be determined eligible and suitable as an internship provider prior to the execution of a contract and the start of a subsidized internship. Employers must meet the following criteria to be considered eligible and suitable for an internship contract.

- a. The employer agrees to the internship contract terms and is willing to sign the contract before the internship begins.
- b. The employer has a minimum of five employees prior to the execution of the contract.
- c. The employer maintains sufficient workers compensation and liability insurance coverage.
- d. The employer agrees to compensate CWP-subsidized interns at the same rate as interns hired for other interns within the company.
- e. The employer complies with safeguards and standards detailed at Section 6 of this policy.
- f. The employer is not currently in a labor dispute with a labor organization.
- g. The employer does not meet any criteria listed at Section 4.

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## 4. Prohibited Employers

Internship contracts are not to be entered into with employers who meet any of the following conditions.

- a. Determined by the Connecticut Department of Labor to have outstanding OSHA violations, wage violations or non-payment of UC taxes.
- b. Employer relocation within the last 120 days that resulted in lay-off of an existing employee or employees due to the relocation. The 120 days commences with the first day of operations in the new location.
- c. The employer is in violation of local, state or federal labor laws.
- d. Employment agencies, except at the discretion of the CWP CEO or designee under specific circumstances such as employment agencies who acts as an employer's human resource department.

## 5. Contract

An internship contract with the employer must be executed prior to the start of any internship activity subsidized by CWP.

Contract provisions are discussed with the employer or the employer representative prior to execution to ensure agreement and a successful internship experience. Contract provisions for discussion include:

- a. Number of participants to be hired as interns
- b. Position title(s) and job description(s) of interns
- c. Planned duration of internship
- d. Planned number of hours of internship
- e. Wage rate
- f. Internship scope and plan
- g. Maximum contract amount
- h. Beginning and end dates of the contract
- i. Record-keeping and reporting requirements including attendance and payroll records
- j. Invoicing procedures
- k. Compliance requirements

An internship contract contains the following elements:

- a. A completed paid internship contract template signed by the employer and CWP
- b. Financial & Billing Requirements and General Conditions
- c. Employer Information Form
- d. Employment Provisions
- e. Intern Job Description
- f. Internship Plan
- g. Worksite Assignment Form

## D. Safeguards and Standards

1. Safeguards to Ensure that Participants do not Displace Other Employees

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- a. A participant in a program or activity must not displace (including a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits) any currently employed employee (as of the date of the participation).
  - b. A program or activity must not impair existing contracts for services or collective bargaining agreements. When a program or activity would be inconsistent with a collective bargaining agreement, the appropriate labor organization and employer must provide written concurrence before the program or activity begins.
  - c. A participant in a program or activity may not be employed in or assigned to a job if:
    - i. Any other individual is on layoff from the same or any substantially equivalent job;
    - ii. The employer has terminated the employment of any regular, unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy so created with the participant; or
    - iii. The job is created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers.
2. Wage and Labor Standards
    - a. Individuals participating in paid internships must be compensated at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience and skills. Such rates must be in accordance with applicable law, but may not be less than the higher of the rate specified in section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) or the applicable State or local minimum wage law.
    - b. Individuals in paid internships must be provided benefits (excluding benefits currently provided through the granted state assistance) and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.
  3. Health and Safety Standards
    - a. Health and safety standards established under Federal and State law otherwise applicable to working conditions of employees are equally applicable to working conditions of participants engaged in paid internship activities.
    - b. Workers' compensation must be provided to participants in paid internship activities on the same basis as the compensation is provided to other individuals in the State in similar employment. Workers' compensation benefits must be available for injuries suffered by the participant in such paid internship Training activities.

## **E. Role of the American Job Center**

### **1. Case Management**

The designated American Job Center representative identified in the employer's contract will maintain contact with the participant throughout the internship period. They will provide case management and coaching, and will assist with workplace issues as requested by the employer.

### **2. Support Services**

Participants will be provided with supportive services in accordance with CWP policy 03-60.

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### 3. Reporting

American Job Center staff will track and record the internship activity as a career service in the WIOA management information system.



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<b>Subject:</b> Individual Training Account (ITAs)	<b>Effective Date:</b> 9/28/15	<b>Rev:</b> 02/23/23

## A. Purpose

ITAs provide funding for occupational skills training through scholarships for eligible individuals to increase income levels, close the skills gap and/or create employment opportunities for customers in the North Central Region. (20 CFR sections 680.300-680.340)

## B. Definitions

**Credential:** Industry-recognized occupational certificate or certification including Registered Apprenticeship and Career and Technical Education educational certificates; an occupational license recognized by the State or Federal government; and other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations. Such certificates must recognize technology or industry/occupational skills for the specific industry/occupation rather than general skills related to safety, hygiene, etc., even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment. (TEGL 10-16 p.12 and DOL WIOA Policy Manual p. 185).

**Eligible Training Provider (ETP):** A training provider that has been pre-determined by the State of Connecticut to meet specific standards in order to be eligible to receive WIOA-funded payments for the provision of training to WIOA-eligible participants.

**Eligible Training Provider List (ETPL):** The list of training providers and their training programs that have been pre-determined by the State of Connecticut to be eligible to receive WIOA-funded payments to provide WIOA-eligible participants with training.

**Individual Training Account (ITA):** The mechanism for paying training providers for training on behalf of WIOA-eligible participants. WIOA-eligible participants must apply for the WIOA funds through the ITA process and meet specific criteria to be eligible. If the participant, training provider and the training are eligible for ITA funds based on this policy, and funds are available, an ITA to pay for training is established. The ITA funds are paid directly to the eligible training provider on behalf of the participant.

**Individual Employment Plan (IEP):** An ongoing strategy to identify employment goals, objectives, and the appropriate combination of services for the participant to achieve the employment goals. The IEP is developed jointly by the participant and the assigned workforce development program provider staff.

## C. Policy

### 1. Criteria ITA Eligibility:

- a. Eligible Training
  - i. Assigned priority for an ITA based on the probability of the training leading to jobs in occupations in demand in the local labor market and/or increased earnings.
  - ii. Identified by CWP as training in an occupation or an industry sector that is in demand in the North Central Region as documented by on CWP's Approved Occupations Training List.
  - iii. Listed along with the training provider on the ETPL.
  - iv. Leads to a recognized credential as defined by the U.S. Department of Labor.
- b. Eligible Applicant
  - i. Resides or works in the North Central Region.
  - ii. Is age eighteen (18) or older as of the first day of training.

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- iii. Has been determined eligible for the WIOA Adult program.
- iv. Is eligible for individual career and training services.
- v. Has a high school diploma or GED.
- vi. Has been determined by program provider staff to be unlikely or unable to obtain or retain employment that leads to self-sufficiency or a wage comparable to or higher than wages from a previous employment.
- vii. Completed the scholarship application process as prescribed by CWP.

## 2. Priority of Service

- a. United States Veterans and eligible spouses always have priority over non-veterans for service, as defined in federal, state and CWP policy.
- b. In the event that funding is extremely limited or nearing exhaustion, after US Veterans and eligible spouses, WIOA-eligible TANF customers have the next highest priority for training, followed by WIOA Low Income Adults.

## 3. ITA Recipient Application Process

- a. **Pre-requisites:** The ITA scholarship application process requires that the participant is first provided an assessment and completes an IEP that indicates that they are in need of training based on the eligibility criteria in section C.1.b of this policy and have the necessary skills and qualifications to successfully complete the selected training program.
- b. **Application Package:** The ITA scholarship application package also includes the completion of the necessary skills assessment, current résumé and an essay. Detailed steps in the application process are found in Section D. Procedures of this policy.
- c. **Evaluation:** ITA Scholarship applications are evaluated based on:
  - i. Identification that the training is directly linked to occupations in demand in the local area, or in another area to which the participant is willing to relocate
  - ii. The alignment of the applicant's background, transferable skills, aptitude and interests in the training program
  - iii. The applicant's awareness of the occupation and industry, and the applicant's readiness as demonstrated by a personal and financial plan
  - iv. Applicant status as a veterans or eligible spouse.
- d. **Documentation:** In all cases, the need for training, and the activities related to and including the training funded through the ITA, shall be documented in the IEP and in required data/case management system as prescribed by CWP.

## 4. Customer Choice

A participant may select any WIOA-approved education and training program in the state, as listed on the current ETPL, if they meet all other criteria relating to initial and subsequent eligibility for such educational and/or training services. Individuals seeking WIOA-funded assistance have the freedom of "customer choice" in selecting the training program that best fits their personal and career needs as determined through the North Central scholarship process. (20 CFR § 680.340)

## 5. Additional Parameters for ITA Usage

- a. Generally, ITAs are only provided for approved training that last not more than 12 consecutive calendar months.

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- b. Participants who have current academic credit toward associate or bachelor's degree programs, which can be completed within two consecutive semesters or less, may request WIOA funds to complete a degree. An academic plan from the institution detailing a course schedule that will result in degree completion within two consecutive semesters must be submitted by applicants requesting WIOA funds for this purpose.
- c. In no instance shall CWP fund all four years of a customer's post-secondary education.
- d. Funding for education and training beyond the baccalaureate level is limited to certifications.
- e. Generally, funding for ITA Scholarships will not exceed \$7,500 per participant.
- f. Exceptions to the time limit and/or scholarship amount limit are only granted based on factors unique to the specific ITA scholarship application including assessment results, priority of the training, fund availability and fund source limitations and priorities. Exceptions to the limitations on duration and/or scholarship level for an ITA require prior approval by the CWP President/CEO or designee.

### D. Procedures

#### 1. ITA Scholarship Application Process Steps

A participant completes the following steps to apply for an ITA scholarship:

- a. Attends one on one information session with program provider staff.
- b. Conducts research into career training programs.
- c. Selects a training program from the Approved Occupations Training List and the ETPL. (The ITA applicant must meet the basic eligibility criteria for the training program at the time of ITA application. Training program eligibility may include criteria such as prior education and/or skill levels, a clean driving record or no criminal record.)
- d. Secures a copy of the course listing for the intended training program.
- e. Explores all available resources to pay for the cost of training to ensure an ITA scholarship is needed.
- f. Applies to the training program but **does not enroll**.
- g. Applies for any financial aid that is available.
- i. Has a representative of the training institution complete the Coordination of Benefits form and attach a copy of proof you applied for FAFSA (Free Application for Federal Student Aid), if applicable.
- j. Meets with program staff to complete required assessments:
  - i. Reading and Math Skills Assessment
  - ii. Any other required skills assessments to enroll in selected training
- k. Completes and submits the ITA scholarship application which consists of:
  - i. WIOA ITA scholarship application form
  - ii. Résumé (must be typed)
  - iii. Results of assessment and including CASAS Reading and Math Scores
  - iv. Essay (must be typed)
  - v. Documentation that prerequisites for occupational training are met (e.g., standard prerequisite self-attestation, driving record, etc.)
  - vi. Coordination of Benefits Form
  - vii. Signed Participant Agreement
  - viii. Signed Education Release Form
  - ix. Course listing for training program
- l. Submits the application package to the program provider frontline staff for review for completion and decision to move forward in the approval process.

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## 2. ITA Scholarship Application Approval Process

- a. If approved by frontline staff, the application is submitted to the following levels of authority in this order for review and decision:
  - i. Program provider supervisor/manager
  - ii. Capital Workforce Partners Program Coordinator
- b. If the ITA scholarship application is approved, the CWP Program Coordinator notifies the program provider staff. The program provider staff notifies the applicant, schedules an appointment to review next steps and updates the participant's plan.

## 3. ITA Scholarship Application Denied

If the ITA scholarship application is denied at any point along the application process, the program provider staff informs the ITA scholarship applicant.

## 4. Following up on Training Progress

Once a participant starts training, the program provider staff contacts them periodically to monitor their progress and offer support, if necessary.

- a. Frequency of contact: Program staff contacts the participant within 24 hours of the scheduled training start date, and at least bi-weekly after the first contact for the duration of the training, unless the participant needs more frequent support.
- b. Method of contact: Contact may be through phone calls, texts or email.
- c. Documentation of contact: Contacts with the participant and updates on the participant's progress are documented in the required data/case management systems.

## 5. Documentation

All the steps in the ITA scholarship process are documented in the data/case management system as prescribed by CWP. These steps include documenting eligibility, assessment, application process, monitoring of progress and acquired training certificates and/or credential.

## 6. ITA Invoice Submission and Payment Process

- a. To be paid from an ITA, a training provider submits an invoice according to the following parameters.
  - i. An invoice is submitted to CWP Accounts Payable (A/P) only after the participant has started training.
  - ii. A copy of the approved, fully signed ITA voucher must be attached to the invoice.
  - iii. The invoice is forwarded by A/P to the CWP program staff representative for review.
  - iv. The invoice must contain the following information:
    - a) Name of training provider
    - b) ITA voucher number
    - c) Date of invoice
    - d) Participant name
    - e) Title of training as shown on ITA
    - f) Dates of training
    - g) Date participant started training
    - h) Cost of training being invoiced
    - i) Name and contact information of the training provider staff member submitting the invoice

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b. Review and Approval

- i. CWP program staff reviews invoice to confirm the following:
  - a) The required information has been submitted by the training provider
  - b) The invoice is properly signed
  - c) The ITA was fully approved and is in the management information system
  - d) The participant started training, confirmed through the case management system
- ii. If the invoice is sufficient for payment, the CWP program staff:
  - a) Assigns a fund code
  - b) Signs off to approve
  - c) Submits the invoice to the CWP Finance Department for payment

c. Payment Process

CWP Finance Department processes the invoice and issues payment to the training provider within 30 days. Payment via ACH is preferred; payment by check is available.

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<b>Subject:</b> Supportive Services	<b>Effective Date:</b> 02/01/23	

## A. Purpose

To provide policy and procedures for the provision of supportive services that are necessary to enable individuals to participate in activities authorized under WIOA. (WIOA sections 3(59) and 134(d)(2) and (3)).

## B. Policy

### 1. Eligibility for Supportive Services (20 CFR §680.910)

Supportive services are only provided to individuals who are:

- a. Certified WIOA eligible, and
- b. Participating in career or training services as defined by WIOA section 134(c)(2) and (3), and
- c. Unable to obtain supportive services through other programs providing such services, and
- d. Compliant with program policies during the applicable period of enrollment.

### 2. Assessment (CTDOL WIOA Policy Manual Section 36 3.c)

The results of an objective assessment are used to determine if supportive services are necessary to enable an individual to participate in career or training services. The assessment identifies any barriers that the participant might have to successfully accessing training or accepting or retaining employment and it establishes whether the participant is eligible for, and able to obtain, supportive services from any other source. The results of the assessment are documented in the participant's Individual Employment Plan (IEP).

### 3. Type of Supportive Services Allowed (20 CFR §680.900)

Supportive services may include, but are not limited, to the following:

- a. Linkages to community services
- b. Assistance with transportation
- c. Assistance with childcare and dependent care
- d. Assistance with housing
- e. Assistance with educational testing
- f. Reasonable accommodations for individuals with disabilities
- g. Legal aid services
- h. Referrals to health care
- i. Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
- j. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes
- k. Payments and fees for employment and training-related applications, tests, and certifications
- l. Assistance with expenses related to obtaining required WIOA eligibility documentation during the enrollment process, see Section B.4 of this policy for criteria and limitations (CTDOL WIOA Policy Manual Section 36 3.g)

A request to authorize payment for any supportive service not on the list above must be submitted to the CWP One-Stop Services Manager for approval. Note: Needs-related payments or payments for basic needs as defined in 20 CFR §680.930 are not authorized under this policy.

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4. Assistance with Obtaining Program Eligibility Documentation (CTDOL WIOA Policy Manual Section 36 4.b)
  - a. Supportive Services can be used to pay for the expenses related to obtaining required WIOA eligibility documentation as long as the participant is otherwise eligible and self-attests to program eligibility pending receipt of documentation. If it is determined that an applicant, who appears to be otherwise eligible, does not have the resources to obtain the required documentation, the applicant may self-attest to the required eligibility factor and be certified based on the self-attestation. Once they are certified, supportive services payments can be used to assist with obtaining the documentation.
  - b. Eligibility elements that require documentation (the use of self-attestation is only temporary until documentation is obtained) include:
    - i. U.S. Citizenship or authorization to work in the United States
    - ii. Social Security Number
    - iii. Age
    - iv. Selective Service Registration
    - v. Other categories as deemed necessary where self-attestation is not acceptable by CT DOL or under federal law
  - a. Participants are provided with a deadline, not to exceed 30 days, to submit the required documentation. Program provider staff assist the participant to obtain the documentation, to the extent possible. Documentation of required eligibility elements must be obtained prior to enrollment in training and/or program exit.
  - b. If eligibility documentation proves the individual is ineligible for WIOA or if the documentation is not acquired before the exit date, CWP is notified immediately.
5. Parameters of Supportive Services Payment Issuance (CTDOL Policy Manual Section 36)
  - a. Supportive services must be provided equitably, i.e., supportive services must be made available to all eligible participants in accordance with this policy and these parameters.
  - b. Supportive services issuance must be approved by AJC supervisor or manager prior to issuance.
  - c. Supportive services may be provided either directly to, or on behalf of, participants as necessary to reduce or eradicate barriers to obtaining or retaining employment, to maintain training participation and/or to obtain required eligibility documentation, if certified eligible based on self-attestation.
  - d. The participant may request that the payment be issued later but may not claim a retroactive payment.
  - e. The amount of a supportive service payment must be determined based on the actual cost of the service or item, or a reasonable estimate based on available information.
  - f. No further payments are issued if the participant fails to participate without good cause.
  - g. The total amount of supportive services per individual participant shall not exceed \$5,000 per period of WIOA enrollment. (20 CFR §680.920)
  - h. Follow-up career services do not qualify for the receipt of supportive services. An individual who is only receiving follow-up services may not receive supportive services. (TEGL 19-16)
  - i. Issuance of supportive services payments is subject to fund availability.
  - j. Participant's self-disclosure or declaration of expenses without documentation is not allowable.

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## C. Examples of Supportive Services by Category

Examples of supportive services by category may include but are not limited to the following:

1. Linkages to community services
  - a. Referrals to State and Federal public assistance programs
  - b. Food pantries and soup kitchens
  - c. Homeless shelters
  - d. Substance abuse/addiction counseling
  - e. Domestic violence intervention
  - f. Parenting resources
  - g. Clothing assistance
  - h. Free and low-cost medical services
  - i. Legal aid services
  
2. Assistance with transportation
  - a. Mileage reimbursement
  - b. Parking passes or reimbursements for parking costs
  - c. Car liability insurance
  - d. Vehicle registration fees
  - e. Driver license fees
  - f. Access to public transit (e.g. bus passes)
  - g. Purchase of a bicycle
  - h. Payment towards vehicle repairs

**Note:** WIOA funds may not be used for foreign travel or for fines or penalties.
  
3. Assistance with child care and dependent care
  - a. Help with identifying child care options as documented through detailed case notes, a statement from the participant and/or screen-shots from 211 Child Care search tool and/or other evidence from child care providers regarding the lack of available.
  - b. Payments towards the costs of child care with the following conditions:
    - i. No other resources are available to help pay for child care as documented through detailed case notes, a statement from the participant and/or other evidence from child care providers regarding the lack of affordable child care.
    - ii. Child care is provided by a licensed child care provider.
    - iii. Participant continues to attend career services, training or employment-related activities
  
4. Assistance with housing
  - a. Help identifying emergency housing options
  - b. Financial assistance towards rent or a mortgage
  - c. Financial assistance towards utilities
  
5. Assistance with educational testing
  - a. Tutoring
  - b. Payment of test-related fees
  - c. Test preparation workbooks and other study aids



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6. Reasonable accommodations for individuals with disabilities
  - a. Assessments for learning disabilities
  - b. Funding of assistive technology/equipment and ASL interpreters
  - c. Funding for foreign-language interpreters to accompany participants to job interviews
  - d. Help securing accommodations from a training provider or employer
  
7. Legal aid services – referral for and costs associated with but not limited to:
  - a. Reinstatement of an individual’s driver’s license
  - b. Expungement or sealing an individual’s criminal records
  - c. Request for accommodations
  - d. Credit, debt and housing issues
  - e. Civil matters related to domestic violence, sexual abuse, retraining orders and injunctions for at risk individuals
  - f. Civil matters related to child support and child custody
  
8. Assistance with uniforms or other appropriate work attire and work-related tools
  - a. Eyeglasses
  - b. Protective eye gear, steel toed footwear and other safety equipment
  - c. Uniforms or clothing suitable for work or interviews
  
9. Assistance with school and training supplies
  - a. Hard copy and electronic text books
  - b. Laptops and other devices and software needed for training
  - c. School fees above and beyond tuition (e.g., application fees, per-credit fees, online course fees, campus parking fees)
  - d. School supplies and other necessary items for students enrolled in postsecondary education classes

**Note:** These fees are not considered training costs under WIOA so they are charged to supportive services.
  
10. Payments and fees for related to employment and training
  - a. Employment-related applications, tests and certification exams
  - b. Fees required by employer or training provider for drug testing, medical exams, fingerprinting, vision exams, etc.
  - c. License issuance and license renewal fees
  
11. Assistance with expenses related to obtaining required WIOA eligibility documentation during the enrollment process, see Section B.4 of this policy for criteria and limitations (CTDOL WIOA Policy Manual Section 36 3.g)

## D. Procedures for Supportive Services Issuance

1. Assessment of Need and Resources to Address Need

If after conducting an objective assessment and/or during participation in program activities, a barrier to participation in career or training activities becomes apparent, AJC staff explore the availability of local resources to resolve the barrier to participation. Local resources include services available through one-stop partners and community services. A description of the

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barrier and how it prevents participation in career and training activities, or the acceptance of employment, is documented in the case notes section of the participant's record. The exploration of one-stop and community resources to address the barriers is also documented in the case notes section of the participant's record. See Policy 3-15 Barriers – Documentation and Recording and section 6 of this policy for more instructions on recording and documenting barriers.

### 2. Requesting Supportive Services

If after exploring all available resources the barrier to participation is not resolved, AJC staff request a supportive service that will resolve the barrier and allow the individual to participate in career or training activities. AJC staff request supportive services by completing the Supportive Service Request Form signed by both the participant and AJC staff submitting the request) and submitting it to their supervisor for consideration and approval. The request for supportive services is documented in the case notes section of the participant's record and the Supportive Services Request form is uploaded to the participant's record. See Policy 3-15 Barriers – Documentation and Recording and section 6 of this policy for more instructions on recording and documenting barriers.

### 3. Review and Approval

The Supportive Services Request form is reviewed by the Director, Manager or Supervisor for compliance with this policy to confirm that the participant is eligible for the supportive service, the need for the supportive service is documented in the assessment, the item or service is allowable, and that the cost is properly determined. All approved, signed documents are uploaded to the case file.

### 4. Method of Issuance

Supportive services payments are issued by one of the following methods

#### a. Purchase of item or service by AJC staff (Preferred method of issuance)

Once the request is approved, the designated AJC staff purchases the item or service directly from a vendor. Supportive service items purchased via the internet or phone order are delivered directly to the participant's residence. If delivery to the participant's residence is not an option, the item is delivered to the AJC. Documentation of the purchase (invoice/receipt) and electronic notification of delivery is uploaded to the participant's record. The purchase is recorded in the case notes section of the participant's record.

#### b. Check to merchant or service provider

Once the request is approved, the AJC staff submits a written request to AJC provider's finance staff to issue a check to the merchant or service provider following local procedures.

The request to finance must include the following details:

- i. Name of the participant
- ii. Name of the merchant or service provider
- iii. Fund source
- iv. Purpose of the supportive services
- v. Amount of payment
- vi. Date payment is required

A copy of the approved Supportive Services Request is included with the request for check issuance.

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- c. Reimbursement check to participant  
Once the request is approved, the AJC staff submits a written request to AJC provider's finance staff to issue a check to the participant for reimbursement for approved support services according to local procedures. The request to finance must include the following details:
  - i. Name of the participant
  - ii. Description of the purchased item or service
  - iii. Purpose of the purchase
  - iv. Fund source
  - v. Amount and date of the purchaseA copy of the receipt for the item or service and the approved Supportive Services Request is included with the request for check issuance.
- d. Merchant gift card (physical card or e-gift card):  
Once the request is approved, the gift-card is issued to a participant and details of the gift card issuance are listed on the supportive services log which is signed by the participant. If issuance is an emailed e-gift card, the AJC staff confirms receipt of the gift card through email with the participant. A copy of the issuing email and the participant's email confirming receipt are saved to the participant's record. *Note: Pre-paid debit card (e.g. American Express or Visa) are not used as a method to pay for supportive services.*

### 5. Documentation

- a. Documentation of Need  
The need for the supportive service is documented in the participant's Individual Employment Plan (IEP) and case notes. The documentation of need includes a description of the following:
  - i. Results of the assessment describing the need
  - ii. If applicable, the documentation required to determine eligibility
  - iii. Career and/or training activities assigned or the potential employment opportunity
  - iv. Results of the exploration of other available resources
  - v. Description of the barrier that necessitates the supportive service
  - vi. Description of how the supportive service will address the specific need
- b. Documentation of Amount  
The basis used to determine the amount of the payment is documented using one of the following options and attached to the Supportive Services Request form:
  - i. Actual cost shown on a bill, invoice, order form or product description with price;
  - ii. Estimated cost based on examples of similar services or items from websites or catalogues;
  - iii. For gas cards, the standard amount is \$25 per week. Should a participant request a higher amount, the calculation must be documented as follows:  
$$[\text{estimated miles to be driven}] \div [\text{miles per gallon}] \times [\text{price per gallon}].$$
- c. Documentation of Review and Approval  
The Director, Manager or Supervisor signs the Supportive Services Request form to document review and approval. The signed form is uploaded to case file.
- d. Documentation of Supportive Services Issuance  
A description of the supportive services issuance is documented in case notes and included on the supportive services log. The description in case notes and the supportive services log

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includes:

- i. Method of issuance (i.e., online order, gift card, or check),
- ii. Name of the recipient (merchant, service provider or participant),
- iii. Amount of the issuance,
- iv. Order number, check number or gift card id number, and
- v. Date of issuance.

The supportive service log also includes the participant's name, case number and signature as well as the AJC staff's signature. If issued via online order or an e-gift card and the participant's signature cannot be obtained on the supportive services log, a copy of the notification of delivery and a copy of an email from the participant confirming receipt is attached to the supportive services log.

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<b>Subject:</b> Incentives	<b>Effective Date:</b> 06/01/23	

## A. Purpose

Incentives are awarded for recognition of achievement of milestones directly related to training services. (CTDOL WIOA Policy Manual Section 41)

## B. Policy

1. Incentive awards are provided to participants for:
  - a. Making progress, achievements, or milestones in a training-related service.
  - b. Completion of a training-related service including occupational skills training, on-the-job training, customized training, and work readiness and workforce preparation training.
  - c. Attaining a nationally recognized credential related to training.
  - d. Training-related job placement.
2. Criteria for providing an incentive award:
  - a. Sufficient program funds are available for awarding incentive payments consistently and equitably to all participants who are eligible.
  - b. If provided, incentives are provided consistently (same amount and method of issuance) and equitably to each individual eligible for the incentive for the same achievement.
  - c. The provision of an incentive award must be part of the participant's Individual Employment Plan (IEP) and tied to specific training-related accomplishment(s).
  - d. The recipient of the incentive must be an active participant in the WIOA program at the time of reaching the training-related milestone. The incentive may be provided within ninety (90) days post-exit as long as the training-related milestone was achieved prior to program exit.
3. Prohibited uses of incentive awards  
Incentive awards are not to be used for the following purposes:
  - a. Entertainment costs such as movies or sporting event tickets or gift cards to movies theaters or other venues whose sole purpose is entertainment (2 CFR Part 200)
  - b. Program recruitment
  - c. Cost of obtaining eligibility documentation
  - d. Payment for hours of work
  - e. Used to pay a stipend for participation in program or work-related activities
  - f. Provision of supportive services
  - g. Reward for attendance in any activity
4. Method of issuance  
Incentives are issued in the form of cash or non-cash.
  - a. Cash incentives are issued in the form of a debit card or a check.
  - b. Non-cash incentives are issued in the form of gift cards, gift certificates to local retailers or other items such as plaques, framed certificates, class rings, etc.
5. Time period of issuance  
Incentives are paid as close as possible to the time of the training-related achievement and no more than thirty (30) calendar days after the date of milestone/goal achievement.

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6. Amount of incentive award
  - a. Incentive awards are only provided if there are sufficient program funds to award incentive payments consistently and equitably to all participants who are eligible.
  - b. Individual issuances of incentive awards amounts are set by the program provider but may be no less than \$25 or more than \$250 per issuance. The CWP Program Manager may approve incentive amounts that vary from these limits based on program provider's written request, including justification for the change. A program provider's executed contract budget containing incentive amounts that vary from these limits constitutes approval.
  - c. The program provider is to develop written standard incentive amounts for specific types of training-related accomplishments and issue incentives consistently and fairly according to their standards. The written standard for incentive amounts for specific types of accomplishments is submitted to CWP for review and approval.
  
7. Documentation

Information regarding the issuance of incentive awards is documented in the participant's case record and tracked on an issuance log. The following information must be recorded and tracked for each issuance.

  - a. Type (e.g., debit card, check, gift card, gift certificate, commemorative item)
  - b. Serial number (or other unique identifying number)
  - c. Amount
  - d. Documentation of training-related milestone uploaded to the participant's record in CWP's designated MIS.
  - e. Name and signature of recipient
  - f. Date issued
  - g. Name and signature of staff providing the award to the recipient

## C. Procedures

1. Details regarding the provision of an incentive is recorded in the participant's Individual Employment Plan (IEP) and case notes in the CWP designated management information system (MIS) prior to the participant's achievement of said milestone. These details include:
  - a. A description of the training-related milestone
  - b. A description of how the incentive will contribute to the achievement of the milestone
  - c. The amount of the incentive
  - d. The method of issuance
  
2. Upon achievement of the training-related milestone, program provider staff obtains the documentation of the milestone and uploads it to the CWP's designated MIS and issues the incentive amount to the participants.
  
3. The incentive is issued in either the form of cash or non-cash.
  - a. Cash incentives are issued in the form of a debit card or a check.
  - b. Non-cash incentives are issued in the form of gift cards, gift certificates to local retailers or other items such as plaques.

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#### 4. Approval Process

According to local program provider incentive issuance process, the incentive payment request from the program staff is reviewed by the program provider director, manager or supervisor for compliance with this policy and to confirm that the participant is eligible for the incentive payment. The provider's internal control document showing approval by designated program provider staff are uploaded to the designated CWP MIS case file.

#### 5. Documentation

The following information regarding the issuance of incentive awards is documented in the participant's case record and tracked on an issuance log:

- a. Type (e.g., debit card, check, gift card, gift certificate, commemorative item)
- b. Serial number (or other unique identifying number)
- c. Amount
- d. Description of training-related milestone
- e. Name and signature of recipient
- f. Date issued
- g. Name and signature of staff providing the award to the recipient

#### 6. Tracking Debit and Gift Cards and Gift Certificates

Debit and gift cards and gift certificates are purchased as needed and are accounted for. The number and value of gift cards on hand plus the properly recorded distributed cards are to reconcile to the original purchased number and value of debit/gift cards and gift certificates.

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<b>Subject:</b> Follow-Up Services & Data Collection	<b>Effective Date:</b> 10/01/22	

**A. Background:** Follow-up Services is one of the three types of WIOA-defined career services provided to WIOA-eligible adults and dislocated workers. WIOA 20 CFR Section 680.150(c) requires that Follow-up Services be made available to WIOA Adult and Dislocated Worker (DW) program participants who are placed in unsubsidized employment, for a minimum of twelve (12) months following the first day of employment. Additionally, TEGL 10-16 requires that “follow-up” performance data of all WIOA Adult and DW program participants who have exited the program (see section C.3 for exceptions) be obtained and reported for a minimum of twelve (12) months following exit.

## **B. Definitions**

**Exit:** As defined by WIOA regulations section 677.150(c), the exit date is the last date of service with no plans to provide the participant with future services. The exit date is determined only after ninety (90) days have elapsed since the participant last received services. For purposes of determining the exit date, self-service, information-only activities, or Follow-up Services are not considered services that would delay the onset of the 90 days.

**Follow-up Data Collection:** As required by WIOA Section 116 and TEGL 10-16, “follow-up” data collection and reporting on employment, wages, education and/or training and credential attainment of all program participants who exited the Adult or DW programs is required quarterly for up to twelve (12) months post-exit.

**Follow-up Service:** As defined in WIOA regulations Section 678.430(c), Follow-up Services is the offering and/or providing of employment retention services such as counseling about the workplace to participants who are placed in unsubsidized employment to help them retain and/or advance in that employment. Follow-up Services are offered and/or provided for up to twelve (12) months after program “close-out” following the first day of employment.

## **C. Policy**

### **1. Follow-up Services**

The Follow-up Services are provided to WIOA Adult and DW participants who are placed in unsubsidized Employment. Follow-up Services are provided as described in sections a.-e. below.

- a. Follow-up Services are offered and provided, as necessary, by contacting participants who have been placed in unsubsidized employment, assessing their employment retention needs and offering support to help them retain or advance in their job.
- b. Contacts may be accomplished in a variety of methods including but not limited to in person conversations if the participant comes to the office, telephone calls, emails, texts or any other practical means most effective at reaching the participant.
- c. Follow-up Services are initially offered within the first 30 days following program close-out due to unsubsidized employment.
- d. Follow-up Services are offered again between 30 and 60 days and between 60 and 90 days after the program close-out date and then at least once per calendar quarter for the following twelve (12) months.
- e. Follow-up Services include, but are not limited to:
  - i. Counseling about the workplace
  - ii. Additional career planning
  - iii. Contact with the participant’s employer to assist with work-related problems
  - iv. Peer support groups



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- v. Information about education and/or training opportunities
- vi. Referral to supportive services in the community.
- f. Follow-up Services are documented in the DOL case management/data system.

## 2. Follow-up Data Collection

For WIOA program performance reporting purposes, post-exit follow-up data are obtained and recorded on all Adult and DW participants who have exited the program.

- a. The following WIOA performance data elements are collected for all WIOA Adult or DW program participants who have exited the program regardless of the reason for the exit (including those who exit for reasons other than unsubsidized employment):
  - i. employment status,
  - ii. wage data,
  - iii. education and/or training completion status and
  - iv. credential attainment.
- b. Follow-up efforts to obtain performance data are conducted at least once per quarter for the 12-month period following the participant's exit date. The quarter for collecting follow-up data is determined by the quarter in which the date of exit occurs.

*For example: If the date of exit is between January 1 and March 31, the first quarter after exit is April 1 through June 30. Program provider staff reach out to obtain performance data at least once per quarter for twelve (12) months starting with the April-June quarter.*

- c. Performance data is documented in the DOL case management/data system.

## 3. Exceptions to the Provision of Follow-up Services and Follow-up Data Policy (TEGL 10-16 Attachment 2)

The following participants are not offered Follow-up Services and it is not necessary to continue to contact the participant quarterly to obtain performance data.

- a. The participant exits the program because they have become incarcerated in a correctional institution or have become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during the course of receiving services as a participant.
- b. The participant exits the program because of medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- c. The participant is deceased.
- d. The participant exits the program because they are a member of the National Guard or the reserve military unit of the armed forces and are called to active duty for at least 90 days.

## D. Procedures

- 1. Providing Follow-up Services (for participants placed in unsubsidized employment)
  - a. Program provider staff offer and/or provide Follow-up Services by contacting the participants, assessing their employment retention needs and offering support to help them retain or advance in their job. Services offered will vary depending on the participant's need.
  - b. Contacts are accomplished by a variety of methods including but not limited to in person conversations if the participant comes to the office, telephone calls, emails, texts or any

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- other practical means most effective at reaching the participant.
- c. Program provider staff offer and/or provide Follow-up Services:
    - i. Within the first 30 days following program close-out due to unsubsidized employment
    - ii. Between 30 and 60 days after the program close-out date
    - iii. Between 60 and 90 days after the program close-out date and
    - iv. At least once per calendar quarter for the following twelve (12) months.
  - d. Follow-up Services may include but are not limited to:
    - i. Counseling about the workplace
    - ii. Additional career planning
    - iii. Contact with the participant's employer to assist with work-related problems
    - iv. Peer support groups
    - v. Information about education and/or training opportunities
    - vi. Referral to supportive services in the community.
  - e. WIOA-funded supportive services are not allowable post-exit, therefore, are **not** provided as a Follow-up Service.
  - f. The Follow-up Service activity and case notes documenting the Follow-up Services activity are created in the DOL case management/data system.
2. Collecting and Documenting "follow-up" Data (for all participants who exit Adult & DW programs)
- a. Program provider staff obtain follow-up performance data on the participant's employment status, wages, education and training enrollment and completion and credential attainment.
  - b. Efforts to obtain performance data are made at least once per quarter for the 12-month period following the participant's exit date.
  - c. Methods of obtaining performance data include contacting participants, their employers, and/or their education and training providers; and/or utilizing available electronic databases.
  - d. Documentation of efforts to obtain performance data is recorded by the completion of a follow-up form and case note in DOL's case management/data system, and if applicable, uploading documentation to validate the data. [TEGL 07-18 Attachment I]
    - i. Documentation of employment status and wages includes:
      - a) Pay check stubs
      - b) Tax records, W2 form
      - c) Wage record match
      - d) Quarterly tax payment forms, such as an IRS form 941
      - e) Document from employer on company letterhead attesting to an individual's employment status and earnings
      - f) Self-employment worksheets signed and attested to by program participants
      - g) Detailed case notes confirming verbal verification by employer and signed by the program provider staff. Detailed case notes are to include the following information:
        - 1) Name and title of the employer staff that verified the employment information
        - 2) Date of contact with employer staff
        - 3) Dates of employment (hire date and last date of employment, if applicable)
        - 4) Pay rate
    - ii. Documentation of education and/or training enrollment

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- a) Copy of enrollment record
- b) File documentation with notes from program staff
- c) School records
- d) Transcript or report card
- e) Data match with postsecondary data system
- iii. Credential attainment
  - a) Copy of credential
  - b) Copy of school transcript
  - c) Case notes documenting information obtained from education or training provider. Case notes are to include the following information:
    - 1) Name and title of the education or training provider staff that provided the education or training information
    - 2) Date of contact with education or training provider staff
    - 3) Dates of education or training activity (beginning and end date, if applicable)
    - 4) Title of credential earned
3. Exited-Participant Requests Not to Be Contacted

If during the twelve (12) months of offering Follow-up services and reaching out to obtain follow-up data, an exited-participant requests not to be contacted, provider program staff take the following steps.

  - a. Review the benefits of allowing for Follow-up Services with the participant
  - b. Ensure that the participant knows how to contact the program staff in the event the participant changes their mind or employment circumstances change
  - c. Document the participant's request in the DOL's case management/data system with a case note including the following details: the date of the request, the reason for the request and a summary of the information provided to the participant.
  - d. For the remainder of the 12-month follow-up period the participant is not contacted to offer Follow-up Services or request follow-up data for performance reporting.
  - e. Follow-up data for performance reporting is still pursued through all other applicable, third-party means. As applicable, follow-up data may be obtained by third-party employment and wage record databases, and if allowable and appropriate, contacts with employers and education and training providers.
  - f. Employers and education and training providers should only be contacted regarding a post-exit participant's status if the participant gave permission or if there is an established program relationship with the employer and education and training provider that allows for the sharing of information on the participant's employment or credential attainment status.
4. Impact of Re-enrollment on Follow-up Data Collection (TEGL 10-16)

If during the 12-month follow-up data collection period, the participant re-enrolls in the WIOA Adult or DW program, efforts to collect quarterly performance data for the initial program participation period continue until the initial 12-month follow-up period ends. Re-enrollment in WIOA Adult and DW program starts a new, separate participation period. When the participant exits the new program participation period, a new 12-month follow-up period of quarterly data collection starts.