

CWP Policy and Procedure Manual

Section 5 – WIOA Youth Policy

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A. General provision

Workforce Investment and Opportunity Act (WIOA) eligible youth may be in-school youth or out-of-school as defined at 20 CFR 681.200. WIOA separates youth into two separate categories: In-school youth ages 14-21 and out-of-school youth ages 16-24 at the time of enrollment. The intent of WIOA is to serve more Out-of-School Youth (OSY) who are disconnected from school and work.

B. Definitions

Basic Skills Deficient: As defined in 20 CFR 681.290(a)(1) having English reading, writing, or computing skills at or below the eighth (8th) grade level on a generally accepted standardized test; or (2) 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.

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 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.

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.

Low Income: As defined by WIOA Section 3(36), an individual is considered low income who:

1. 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,
 - a. the Supplemental Nutrition Assistance Program (SNAP) established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), or
 - b. the Temporary Assistance for Needy Families (TANF) program under part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.), or
 - c. the Supplemental Security Income (SSI) program established under Title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or
 - d. State or local income-based public assistance i.e., State Administered General Assistance (SAGA); Refugee Cash Assistance (RCA); and HUSKY Health.

Or

2. Is in a family with total family income that does not exceed the higher of:
 - a. the poverty line; or
 - b. 70 percent of the lower living standard income level.

Or

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3. Receives or is eligible to receive a free or reduced-price lunch
Or
4. Is a youth who lives in a high poverty area as defined by WIOA regulations 20 CFR 681.260 (also see WIOA TEGL 21-16 p.5 and Attachment II) as a Census tract, a set of contiguous Census tracts, an American Indian Reservation or other tribal land having a poverty rate of at least 25%. See <https://censusreporter.org/> to look up address in a high poverty census track.

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**.

School: Secondary or post-secondary school as defined by the State. WIOA does not consider providers of Adult Education under WIOA Title II or dropout re-engagement programs, YouthBuild programs, and Job Corps programs to be “schools” (20 CFR 681.230). One exception is High School Equivalency (HSE) programs funded by the K-12 school system that are classified by school system as “school” (WIOA TEGL 21-16 p.3).

C. **Out-of-School Youth (OSY) Eligibility** (20 CFR 681.210)

To be eligible to participate in CWP’s WIOA-funded OSY youth activities, an individual shall, at the time of eligibility determination, be an OSY as defined by section C.4 below and meet all other eligibility criteria listed in sections C.1 - 3 below.

1. Be authorized to work in the United States.
2. Reside in one of the 37 towns within the North Central region.
3. Register with Selective Service, if applicable. **Note:** Youth who become of age for Selective Service registration after enrollment must meet Selective Service requirements by, or within 30 days of, their 18th birthday (CWP Policy Manual Section 2-40).
4. Meet the “out-of-school” youth criteria as defined by WIOA 129(a)(1)(B) and 20 CFR 681.210. To meet the WIOA OSY criteria, an individual is:
 - a. not attending any school, secondary or post-secondary (see definition of school in section B above),
And
 - b. not younger than age 16 or older than age 24 (Note: Participants may continue in WIOA OSY activities beyond age 24 through exit, if they were determined eligible prior to turning 24)
And
 - c. one or more of the following:
 - i. A school dropout.
 - ii. A youth who is within the age of compulsory school attendance but has not attended school for at least the most recent complete school year calendar quarter.
 - iii. A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is:
 - a) basic skills deficient; or

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- b) an English language learner.
- iv. An individual who is subject to the juvenile or adult justice system.
- v. A homeless individual (as defined in section 41403 (6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2 (6))), a homeless child or youth (as defined in section 725 (2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a (2))), a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement.
- vi. An individual who is pregnant or parenting.
- vii. A youth who is an individual with a disability.
- viii. An individual who does not possess any of the criteria identified section C. 4.c.i. - vii above but is low-income and requires “additional assistance” to enter or complete an educational program or to secure or hold employment. CWP defines a youth who requires “additional assistance” as an individual who meets one of the following criteria:
 - a) Youth of color who is a child of a single parent
 - b) Youth of color who is a child of parents without postsecondary education
 - c) Youth who is a victim of violence/assault or exposed to violence/assault
 - d) Youth who is an expectant father
 - e) Youth who is a male of color

D. In-School Youth (ISY) Eligibility

To be eligible to participate in CWP’s ISY WIOA-funded youth activities, an individual shall, at the time the eligibility determination is made, be an ISY as defined by section F.3 below and meet all other eligibility criteria listed in section D.1-2 below.

1. Be authorized to work in the United States.
2. Reside in one of the 37 towns within the North Central region.
3. To meet the WIOA ISY criteria (20 CFR 681.220), an individual is:
 - a. Attending school, including secondary or post-secondary school. WIOA does not consider providers of Adult Education under WIOA Title II, YouthBuild programs, and Job Corps programs to be “schools”. Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are considered ISY.
And
 - b. Not younger than 14 (unless an individual with a disability who is attending school under State law) and not older than 21 at the time enrollment (age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 21 once they are enrolled in the program).
And
 - c. Low-income
And
 - d. One or more of the following:
 - i. Basic Skills deficient;
 - ii. An English Language Learner;
 - iii. An offender;

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- iv. A homeless individual which may include:
 - a) runaway youth;
 - b) youth in foster care or has aged out of the foster care system;
 - c) youth eligible for assistance under Sec. 477 of the Social Security Act (Chafee Foster Care Independence Program); or
 - d) youth in an out-of-home placement
- v. Pregnant or parenting;
- vi. Individual with a disability;
- vii. An individual who does not possess any of the criteria identified section D. 3.d.i. - vi above, but who requires “additional assistance” to complete an educational program or to secure or hold employment. The State WIOA CWP defines a youth who requires “additional assistance” as an individual who meets one of the following criteria:
 - a) Youth of color who is a child of a single parent
 - b) Youth of color who is a child of parents without postsecondary education
 - c) Youth who is a victim of violence/assault or exposed to violence/assault
 - d) Youth who is an expectant father
 - e) Youth who is a male of color

E. Five percent (5%) Low Income Exception

WIOA 20 CFR 681.250(c) allows for a low-income exception of up to five percent of WIOA youth participants who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA youth except the low-income criteria. The exception is for five percent of the newly enrolled WIOA youth in the North Central region during the program year who would ordinarily be required to meet the low-income criteria. It is not five percent of all WIOA Youth participants in the North Central region since many OSY eligibility categories do not require low-income status.

For an OSY applicant who does not meet any of the eligibility criteria listed in section C.4.c.i-vii above to be eligible based on CWP’s 5% low-income exception policy, the OSY applicant must meet at least one of the following criteria: basic skills deficient, an English language learner, a youth who is a child of a single parent, a youth who is a child of parents without postsecondary education, a young victim of violence/assault or exposed to violence/assault, or young person of color. For an ISY applicant who is not low-income to be eligible based on CWP’s 5% low-income exception policy, the ISY applicant must have at least two of the barriers listed in section D.3.d above. CWP determines applicants’ eligibility for a low-income exception. See section H.5 below for instructions to request an exception to the low-income eligibility requirement.

F. Priority of Service Subpopulations

Within the eligible population as defined above in sections C and D, CWP prioritizes programming to low-income youth in the following subpopulations:

1. Youth of color
2. Young parents
3. Youth in or aging/aged of foster care

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4. Youth who are involved in the justice system
5. Youth with disabilities

G. School Status Continues for Duration of Enrollment

OSY or ISY determination is made at the time of program enrollment. Once the school status of a youth is determined at enrollment that school status remains the same throughout the youth's participation in the WIOA youth program. For example, if a youth determined to be an OSY at the time of enrollment and subsequently reenters high school or enrolls in postsecondary education, that youth is still considered an OSY throughout his/her participation in the WIOA youth program. (WIOA TEGL #8-15 p. 4.)

H. Documenting Elements of Eligibility

All required documentation of eligibility must be uploaded to the case management data system designated for the WIOA Youth program. 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 Youth 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 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,

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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. Resident of a Town in the North Central Region

To receive WIOA Youth funded services through CWP, an applicant must reside in one of the 37 towns in the North Central region (see list of NC region towns at <https://capitalworkforce.org/town-profiles/>). An applicant verifies residency by presenting documentation that contains both his/her name and address. Documentation of residency must be dated within the six (6) months prior to the application date. Examples of documents that verify residency include but are not limited to:

- a. A government or school issued ID (if expired, within 30 days of expiration date),
- b. School records,
- c. A post-marked envelope addressed to the applicant,
- d. A bank statement or bill,
- e. Rental agreement

Documentation such as school records, 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 he/she resides that stating that the applicant resides with them at their address will be accepted as documentation.

3. 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

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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

4. WIOA Eligibility Criteria

- a. Age
Any government issued document containing the applicant's date of birth such as a passport, birth certificate, driver's license, State ID, or school record.
- b. Basic skills deficiency or English language learner
Most recent CASAS assessment obtained within the last 12 months. A CASAS reading or math scaled score of less than 235 is evidence of a basic skills deficiency.
- c. School Enrollment
School records including report card, transcript, printout of school record, letter from school official on school letterhead that indicate enrollment in current school year.
- d. In foster care or has aged out of foster care
Letter or memo from DCF stating applicant was or is in foster care.
- e. Subject of juvenile or adult justice system
Court records, letter from official in justice system or letter from DCF indicating applicant was or is involved in juvenile or adult justice system.
- f. Pregnant
Doctor's note, medical record or a completed Self-Attestation form (see Section 8 Forms of this policy manual for Self-Attestation form), if obtaining medical records or Doctor's note is not possible.
- g. Parenting
Child's birth certificate listing applicant as parent.
- h. Youth with a disability
School record such as a PPT, documentation of SSI or a completed Self-Attestation form (see Section 8. Forms of this policy manual).
- i. Low Income
 - i. Any document from the issuing authority showing that the applicant received or is a dependent of a family who received SNAP, TFA, refugee cash assistance, or HUSKY Health in the last six (6) months.
 - ii. Any document from the issuing authority showing that the applicant received SAGA or SSI.
 - iii. Documentation of free or reduced lunch eligibility includes a letter or record from the school system, self-attestation of free and reduced lunch eligibility on a

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signed Self-Attestation form, and verification of school of attendance at a school on the Community Eligibility Provision (CEP) list. Documentation must be for the current school year or, in the case of youth enrolling during the summer, verify that the lunch eligibility was determined no more than one year (or previous school year) prior to WIOA eligibility determination.

- iv. If not a recipient of any of these benefits, the CWP Family Income Statement is completed to determine annual income (see Section 8. Forms of this policy manual for Family Income Statement form). For detailed instructions for various methods of determining and documenting income see Annualized Income Methods in the Appendix of this manual.
- v. If there is no income, the applicant completes Self-Attestation form (See Section 8. Forms of this manual for Self-Attestation form).
- j. Documentation of the following eligibility criteria is obtained by the completion of a Self-Attestation form (see Section 8. Forms of this policy manual for the Self-Attestation Form).
 - i. Not attending school
 - ii. A school dropout
 - iii. A youth within the age of compulsory school attendance but has not attended school for at least the most recent complete school year calendar quarter. School year quarter is based on how the local school district defines its school year quarters.
 - iv. A homeless individual
 - v. A runaway

5. Five Percent (5%) Low Income Exception

CWP determines eligibility under five percent (5%) low-income exception policy.

Documentation of the eligibility determination is an approved WIOA Youth 5% Low-Income Exception Request form. At the time of application, providers complete the WIOA Youth 5% Low-Income Exception Request form (See Section 8 Forms of the CWP online policy manual) and submit it to the CWP WIOA Youth Manager for consideration. CWP's eligibility determination for WIOA under CWP's low-income policy will be documented on the form and returned to the provider to retain in the applicant's record.

6. Disconnected Youth Considerations

Youth who have multiple barriers to participating in education, training and/or the workforce may also have difficulty obtaining the required documentation to prove WIOA eligibility. If it is determined that an applicant, who appears to be otherwise eligible, is having or will have difficulty obtaining required documentation for eligibility, they may self-attest to required eligibility factors listed in section 6.a. below and be certified eligible based on the self-attestation.

- a. 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

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- iv. Selective Service Registration
 - v. Low Income Status
 - vi. Other categories as deemed necessary where self-attestation is not acceptable by CT DOL or under federal law
- b. 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.
- c. If it appears that the applicant does not have the resources to pay for the required 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. See CWP WIOA Youth Supportive Services policy.
- d. If eligibility documentation subsequently proves that the individual is ineligible for WIOA or if the documentation is not acquired before the exit date, CWP is notified immediately.

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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. Purpose

The Individual Service Strategy (ISS) is a written action plan that guides a participant's progress towards a chosen career pathway. The ISS includes the participant's goals and objectives and the services linked to program participation and performance. In accordance with WIOA Sec. 129(c)(1)(B), this policy details the requirements for developing, reviewing and tracking Individual Service Strategies for WIOA youth participants.

B. Definitions

Objective Assessment: The objective assessment is a review of a participant's basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs and developmental needs. It is used to determine a participant's academic levels, skill levels and service needs for the purpose of identifying appropriate services and career pathways to inform the development of the participant's service strategies. Per WIOA Sec. 129(c)(1)(A), programs must provide an objective assessment of each participant. See section 5-30 Assessment of this manual for more details on assessments for youth in WIOA-funded programs.

Life Domain Profile: The CWP Life Domain Profile is a tool that provides a snapshot of the participant's circumstances across multiple life domains. This tool is applied during the intake process concurrent with the program eligibility determination process, and at regular intervals throughout program enrollment. The Life Domain Profile is designed to capture changes across a variety of quality of life and self-sufficiency indicators. See section 5-30 Assessment of this manual for more details on the Life Domain Profile.

WIOA Performance Indicators: Per WIOA Sec. 116(b)(A)(ii) WIOA, youth programs have six performance indicators.

1. The percentage of program participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the program
2. The percentage of program participants who are in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the program
3. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program
4. The percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent, during participation in or within 1 year after exit from the program
5. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward such a credential or employment

WIOA Youth Service Elements: There are fourteen (14) WIOA youth service elements that programs must make available to participants, as needed (per WIOA Sec. 129(c)(2)).

1. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate
2. Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential

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3. Alternative secondary school services, or dropout recovery services, as appropriate
4. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services
5. Activities that help youth prepare for and transition to postsecondary education and training.
6. Paid and unpaid work experiences that have as a component academic and occupational education, which may include:
 - a. Employment opportunities available throughout the school year
 - b. Pre-apprenticeship programs
 - c. Internships and job shadowing and
 - d. On-the-job training opportunities
7. Occupational skill training, which shall include priority consideration for training programs that lead to recognized, stackable credentials that are aligned with in-demand industry sectors or occupations in the North Central region, as defined by CWP
8. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster
9. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate
10. Supportive services
11. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months
12. Follow-up services for not less than 12 months after the completion of participation, as appropriate
13. Financial literacy education
14. Entrepreneurial skills training

C. Procedures

1. ISS Development

Program staff are to use the following steps in developing the ISS.

- a. Prior to ISS development, participants must be determined eligible to receive WIOA-funded services and complete an objective assessment and the CWP Life Domain Profile.
- b. Program staff discusses the results of the objective assessment and the Life Domain Profile with the participant and use the results to inform the development of the ISS.
- c. The program staff works with the participant to develop the participant's ISS. The ISS includes the following elements:
 - i. **Career goals and objectives:** Based on the results of assessments and the CWP Life Domain Profile, program staff assist participants in identifying their career goals and objectives. Participants must have one goal set for each performance indicator. Each goal has three (3) objectives.
 - ii. **Career pathways:** Program staff assist participants in identifying an appropriate career pathway to achieving their career goals and objectives. If a participant chooses a career pathway that is not supported by the provider's available program tracks or services, the provider refers the participant to other, more appropriate programs.

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- iii. **Barrier identification:** In order to ensure participants successfully participate in their career pathways and attainment of their goals and objectives, the participants barriers to reaching their goals are identified and addressed. Barriers are discovered during the assessment process and during program participation.
 - iv. **Supportive services and referrals:** Supportive services and referrals needed to address the barriers are provided and documented in the ISS. If it is determined that a participant requires a supportive service, the program staff refers that participant to the appropriate organization/services.
 - v. **WIOA program elements:** The fourteen (14) WIOA youth service elements described in section B of this policy must be made available, as needed, to assist participants to successfully reach their goals and objectives. The WIOA program elements are incorporated into the ISS based on the participant's goals, career pathway and barriers.
 - vi. **Incentives.** Incentives payments to participants are allowed for recognition and achievement and must be tied to program goals on the participant's ISS. The provision of an incentive for attaining one or more program goals must be documented in the participant's ISS. Incentives can be either non-cash or cash incentives and must be awarded in a consistent and fair manner to each participant receiving the incentive (per § 681.650). Incentives may not include entertainment such as movie or sporting event tickets (per 2 CFR Part 200 & § 681.640).
- d. The participant's ISS must link to at least one or more performance indicators (See section B of this policy for description of performance indicators) and include an identified career pathway with education and employment goals, objectives and appropriate services.
2. ISS Review
- The program staff are to use the following steps when reviewing and updating the ISS to ensure it remains current and effective in assisting participants reach their individual career goals.
- a. No less than every ninety (90) days, the program staff and participant discuss the participant's progress toward meeting goals and objectives.
 - b. The participant's Life Domain Profile is reviewed and updated as the participant's circumstances change. The results of the updated Life Domain Profile are addressed in the ISS, as necessary.
 - c. Informal ISS reviews may occur monthly, at the discretion of program staff.
 - d. The goals, objectives and services are updated by program staff with the participant's knowledge and agreement.
 - e. Planned services should evolve with changing needs, goals and objectives. As objectives are met and goals are accomplished, new goals are set. As new barriers to reaching goals are identified, new supportive services and/or referrals for services are made.
 - f. As new goals, objectives and services are added to the ISS, a new review time period is established.
 - g. The program staff creates a case note documenting the discussion with the participant regarding the update or change to the ISS.
 - h. All formal updates to the ISS must be recorded in the data system within two (2) business days.
3. ISS Closure
- The ISS stays open until the participant exits the program. Once the participant exits the program, the program staff close the goals and activities in the ISS.

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A. General Provision

Internship is a type of paid work experience, one of the fourteen program elements identified at WIOA Section 129(c)(2)(C)(iii). In accordance with § 681.600 (b), work experiences must include academic and occupational education. The educational component may occur concurrently or sequentially with the work experience. Further academic and occupational education may occur concurrently or sequentially with the internship. Work experiences provide the youth participant with opportunities for career exploration and skill development.

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 youth 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 Service Strategy.

C. Policy and Procedures

A. Participant Eligibility

Participants must be enrolled in the WIOA Youth program, actively engaged with a WIOA Youth service provider, and referred by the WIOA Youth service provider. Participants must have completed or be enrolled in occupational skills training related to the employer's industry sector.

B. Participant Suitability

Participants must demonstrate the skills required by the employer, through successful progress in or completion of related occupational training and possession of any certification or credential required by the employer. The employer will select interns for hire based on a review of participant qualifications and an interview.

C. 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.

1. The employer agrees to the internship contract terms and is willing to sign the contract before the internship begins.
2. The employer has an existing internship program or demonstrates the capacity to manage the new internship prior to the execution of the contract.

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3. The employer maintains sufficient workers compensation and liability insurance coverage.
4. The employer agrees to compensate CWP-subsidized interns at the same rate as interns hired for other interns within the company.
5. The employer complies with safeguards and standards detailed at Section 6 of this policy.
6. The employer is not currently in a labor dispute with a labor organization.
7. The employer does not meet any criteria listed at Section 4.

D. 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.

E. 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

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- d. Employment Provisions
- e. Intern Job Description
- f. Internship Plan
- g. Worksite Assignment Form

F. Safeguards and Standards

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

G. Role of the WIOA Youth Provider

1. Occupational Training and Academic Education

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Prior to referring a participant to an employer the WIOA Youth provider will enroll the participant in occupational training and academic education education consistent with the participant's Individual Service Strategy.

2. Assessment

The WIOA Youth provider will assess participants for suitability in accordance with this policy, and refer them to the employer for consideration. The internship will be documented as a goal or objective in the participant's Individual Service Strategy.

3. Case Management

The designated WIOA Youth provider 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.

4. Support Services

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

5. Reporting

WIOA Youth Provider staff will track and record the internship activity in the WIOA management information system.

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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 and 681.550)

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 the 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 Services Strategy (ISS): The Individual Service Strategy (ISS) is an action plan based on an objective assessment that guides a participant's progress towards a chosen career pathway through goals, objectives and services linked to program participation and performance.

C. Policy

1. ITA Eligibility Criteria

- a. Eligible Training
 - i. Training programs are 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. CWP identifies the industry sectors and occupations in demand for the North Central Region to be used when prioritizing training programs for ITA eligibility.
 - iii. The training program must be listed along with the training provider on the ETPL.
 - iv. To be considered for funding through WIOA, a training program must lead to a recognized credential as defined by the U.S. Department of Labor.
- b. Eligible Applicant
 - i. Is age eighteen (18) or older as of the first day of training.

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- ii. Has been determined eligible for a WIOA program.
- iii. Has a high school diploma or GED; ITA scholarships for participants concurrently enrolled in high school completion or GED programs may be approved on a case-by-case basis (see section D.4 of this policy for procedures for approval of participants without a high school diploma or GED).
- iv. 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. (CT DOL WIOA Policy Manual)
- v. Has completed the scholarship application process as prescribed by CWP.

2. Priority of Service

- a. United States Veterans and eligible spouses who have been determined eligible for an ITA scholarship based on this policy will 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.

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 ISS 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. of this policy.
- c. **Evaluation:** ITA scholarship applications are evaluated on the following criteria:
 - i. Evidence 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, aptitudes, and interest in the training program.
 - iii. The applicant's awareness of the occupation and industry, and the applicant's readiness as described in the essay.
- 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 ISS and in the 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 participant'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 applicant's assessment, priority of the training, fund availability and fund source limitations and priorities. Exceptions to the limitations on duration and/or scholarship amount require prior approval by the CWP President/CEO or designee.

D. Procedures

1. ITA Scholarship Submission

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

- a. Demonstrates that the criteria described in section C of this policy are met, including:
 - i. Completing required assessments:
 - a) Reading and Math Skills Assessment; a college degree may be considered as evidence of reading and math skills in some cases
 - b) Life Domain Profile
 - c) Any other skills assessments required to enroll in the selected training
 - ii. Developing an ISS with program provider staff based on the results of the assessments and an interview with program provider staff that indicates that an ITA is needed and appropriate.
- b. Conducts research into career training programs.
- c. Selects a training program (the ITA scholarship applicant must meet the basic eligibility criteria for the training program at the time of ITA scholarship 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 or for the provision of training including training available through local program providers 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.
- h. Has a representative of the training institution complete the Coordination of Benefits Form and attaches a copy of proof that a FAFSA (Free Application for Federal Student Aid) was completed, if applicable.
- i. 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. Consent and Release of Information forms (if applicable)
 - vii. Coordination of Benefits form
 - viii. Signed Participant Agreement

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- ix. Signed Education Release Form
- x. Course listing for training program
- j. Submits the application package to the program provider frontline staff to review for completion and decision to move forward in the approval process.

2. ITA Scholarship Application Approved

- a. If approved by frontline staff, the application is submitted to the following levels of authority for review and decision in the following order:
 - i. Program provider supervisor
 - ii. Program provider manager
 - iii. CWP 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 funding and next steps, 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. Exception to High School Diploma/GED Eligibility Requirement

Generally, to be eligible for an ITA scholarship, an applicant must have a high school diploma or a GED. This eligibility requirement helps to increase the likelihood that an applicant will be eligible for and successful in training and in post-training employment. However, exceptions to this eligibility requirement are considered on a case-by-case basis if the applicant is otherwise eligible and is concurrently in a high school completion or GED program. Approval for this exception requires that:

- a. All other eligibility criteria are met.
- b. The application process described in section D.1 of this policy is completed.
- c. The results of the Life Domain Profile (LDP) and the ISS indicate that the participant has the resources to successfully complete the training while concurrently completing high school or obtaining a GED.
- d. An ITA High School Diploma/GED Requirement Exception Form is completed describing how the results of the LDP and ISS support the conclusion that the participant will successfully complete training while completing high school or obtaining a GED.
- e. If the completed ITA High School Diploma/GED Requirement Exception Form is approved by program provider supervisor, it is submitted for review and decision by the following levels of authority:
 - i. Program provider manager
 - ii. CWP Program Coordinator
 - iii. CWP Program Manager
 - iv. CWP Program and Operations Administrator
- f. If at any point along the approval process the exception request is denied, the program provider staff informs the ITA scholarship applicant.

5. Following up on the Participant's Progress

Once a participant starts training, the program provider staff contacts them periodically to monitor their progress, to trouble-shoot 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

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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.

6. 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.

7. 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
- 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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A. Purpose

To provide policy and procedures for the provision of supportive services that are necessary to enable youth to participate in activities under WIOA. (WIOA sec.3(59))

B. Policy

1. Basic criteria for receipt of supportive services

Supportive services are only provided to individuals who:

- a. Are certified WIOA eligible; and
- b. Need supportive services to participate in program services (or in post-program employment-related activities during the follow-up period, if funding allows); and
- c. Are unable to obtain the supportive services through any other source; and
- d. Compliant with program policies during the applicable period of enrollment and follow-up period, as applicable.

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 Service Strategy (ISS).

3. Type of Supportive Services Allowed (20 CFR §681.570)

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. Food may be provided when it assists or enables participation in allowable youth program activities and employment and training goals. The provision of food is limited to reasonable and necessary purchases that are coordinated, when possible, with other community, state, or federal services that provide food for low-income individuals.
- m. 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 & 4 and Section 19. Expanded Disconnected Youth Considerations)

A request to authorize payment for any supportive service not on the list above must be submitted to the CWP Youth Services Manager for approval.

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4. Assistance with Obtaining Program Eligibility Documentation (CTDOL WIOA Policy Manual Section 36.4 and Section 19 Expanded Disconnected Youth Considerations)
 - 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. Low Income Status
 - vi. Other categories as deemed necessary where self-attestation is not acceptable by CT DOL or under federal law
 - c. 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.
 - d. 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 program provider 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. Issuance of supportive services payments is subject to fund availability.
 - h. 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 my 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

6. Reasonable accommodations for individuals with disabilities
 - a. Assessments for learning disabilities

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- 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, restraining 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.

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, program provider 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 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 CWP Policy 5-15 Barriers – Documentation and Recording and see section D.5 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, program provider staff request a supportive service that will resolve the barrier and allow the individual to participate in career or training activities. Program provider staff request supportive services by completing a supportive service request form (signed by both the participant and program provider 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

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supportive services request form is uploaded to the participant's record. See CWP Policy 5-15 Barriers – Documentation and Recording and section D.5 of this policy for more instructions on recording and documenting barriers.

3. Review and Approval

According to local provider supportive services approval process, supportive services request is reviewed by the program provider 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 program provider (Preferred method of issuance)

Once the request is approved, the designated program provider 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 program provider location. 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 entity providing the goods or services

Once the request is approved, the program provider staff submits a written request to the program 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 entity providing the goods or services
- iii. Fund source
- iv. Purpose of the supportive services
- v. Description of the item or service being purchased
- vi. Amount of payment
- vii. Date payment is required

A copy of the approved supportive services request is included with the request for check issuance.

c. Reimbursement check to participant

Once the request is approved, the program provider staff submits a written request to the provider's finance staff to issue a check to the participant for reimbursement for approved support services according to local procedures. The request to provider's finance staff 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 purchase

A 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

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issuance are listed in the CWP designated case management (MIS). If issuance is an emailed e-gift card, the program provider 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 Service Strategy (ISS) 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

According to local program provider process, 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 CWP designated MIS case notes and supportive services record as well as on the supportive services issuance log and includes:

- i. Name and case number of the participant
- ii. Method of issuance (i.e., online order, gift card, or check)
- iii. Name of the merchant or entity providing the goods or services
- iv. Amount of the issuance
- v. Fund source
- vi. Order number, check number or gift card id number
- vii. Date of issuance, and
- viii. Name of the program provider staff who requested the supportive service
- ix. Signature of participant verifying receipt of the issuance on paper log (For online orders or e-gift cards, when a signature cannot be obtained, a copy of the notification of receipt and/or a copy of an email from the participant confirming receipt is uploaded to the CWP designated MIS.)

e. Tracking Gift/Debit Cards

Gift cards are purchased as needed. All gift/debit cards are to be 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.

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A. Purpose

Incentives are awarded for recognition of achievement directly tied to program activities and are intended to encourage program participation and attainment of the participant's short- and/or long-term employment goals. (20 CFR 681.640 and TEGL 21-16)

B. Policy

1. Incentive awards are provided to participants for:
 - a. Achievement and attainment of individual goals that lead to success and completion of a secondary school diploma or its equivalent.
 - b. Completion of a training-related service such as occupational skills training, on-the-job training, customized training, and work readiness and workforce preparation training.
 - c. Making progress, achievements, or milestones in a training-related service.
 - d. Attaining a nationally recognized credential related to training and/or an employment goal.
 - e. Obtaining full-time unsubsidized employment.
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 Service Strategy (ISS) and tied to specific accomplishment(s) prior to the individual's achievement meriting the incentive award.
 - d. The recipient of the incentive must be an active participant in the WIOA Youth program at the time of reaching the milestone/goal described in the ISS.
 - e. The recipient of the incentive must be an active participant in the WIOA Youth program at the time of receipt of the incentive.
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.

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5. Time period of issuance
Incentives are paid as close as possible to the time of the achievement and no more than thirty (30) calendar days after the date of milestone/goal achievement.
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 \$5 or more than \$100 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.
 - c. Program providers are to develop written standard incentive amounts for specific types of 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 milestone/goal achieved uploaded to the participant's record in CWP's designated MIS. (e.g., certificate, diploma, CCS appraisal results, verification of unsubsidized employment)
 - 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 including the method of issuance and amount of the incentive is written into the participant's ISS and tied to specific milestones or accomplishments prior to the individual's achievement of said milestones or accomplishments.
2. The ISS includes a description of the link between specific milestones or accomplishments and the provision of incentive for achieving goals. The ISS documents the plans for providing incentives based upon the participant attaining one or more milestones or goals described in the ISS.
3. The provision of an incentive for achieving milestones and/or goals described in the ISS is also described in participant's case notes.
4. Upon achievement of a milestone or goal as described in the ISS, program provider staff obtains documentation of the achievement and uploads it to CWP designated management

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information system (MIS) and issues the incentive amount to the participants by the method described in the ISS within thirty (30) days of the date of the achievement.

5. 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.

6. 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 case file.

7. 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. Purpose tied to program activity on the ISS
 - e. Name and signature of recipient
 - f. Date issued
 - g. Name and signature of staff providing the award to the recipient

8. 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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Subject: Stipends	Effective Date: 05/01/23	

A. Purpose

To help support program participants' participation in assigned education or training activities.

B. Policy

1. Provision of stipends

Stipends are fixed, regular cash payments to program participants to support their participation in assigned education or training activities. Cash stipends are issued in the form of a check, debit card, or direct deposit to the participant's account.

2. Criteria for the provision of stipends

- a. Sufficient program funds are available for awarding stipend payments consistently and equitably to all participants who are eligible.
- b. If provided, stipends are provided consistently (same amount) and equitably to each individual eligible for the stipend.
- a. Participant must be active in the WIOA Youth program and be satisfactorily participating in the assigned education or training activity.
- b. The program provider must have a written attendance policy consistent with the requirements of the education or training provider.
- c. Program staff must review the attendance policy with participants before education or training activity begins and must provide a copy. Review of the attendance policy must be documented in case notes.
- d. Stipends are paid only to participants with satisfactory attendance as defined in the attendance policy.
- e. The activity supported by the stipend issuance is limited to education or training activities that are part of the participant's Individual Service Strategy (ISS).
- f. The provision of stipends for education or training activities must also be included in the participant's ISS and described in the participant's case notes in the CWP designated management information system (MIS).

3. Amount of stipend

- a. Stipends are only provided if there are sufficient program funds to award stipend payments consistently and equitably to all participants who are eligible and participating in similar education or training activities.
- b. Stipend amounts are set by the program provider but must be no less than \$25 and no more than \$100 per weekly issuance. The CWP Program Manager may approve stipend amounts that vary from these limits based on program provider's written request, including justification for the change.
- c. Stipends are not pro-rated. Participant must meet the minimum attendance standard for the weekly or bi-weekly period in accordance with provider's attendance policy.

4. Time period of stipend issuance

Stipends are paid directly to the participant at regular weekly or bi-weekly intervals.

C. Procedures

1. Program provider staff confirm that participant is enrolled in the education or training activity that is documented in the ISS and case notes.

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2. Program provider staff follow local program provider procedures for requesting stipend issuances for the participant.
3. Prior to issuing each regular stipend payment, the participant's attendance in the education or training activity is documented in the participant's MIS record and in case notes. Stipend payments are issued for each weekly or bi-weekly period that the participant maintains satisfactory attendance until the activity is completed.
4. Program providers are to adhere to their local agency financial procedures for the issuance of stipends.

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Subject: Follow-Up Services & Data Collection	Effective Date: 11/1/22	

A. Background: Follow-up Services are one of the three types of WIOA-defined career services provided to WIOA-eligible youth. WIOA 20 CFR Section 680.580 requires that Follow-up Services be provided to all WIOA Youth program participants who exit from the program to help ensure that each youth is successful in employment and/or postsecondary education and training. Follow-up Services must be provided for a minimum of twelve (12) months following the exit date. Additionally, TEGL 10-16 requires that “follow-up” performance data of all WIOA Youth 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 WIOA Youth program is required quarterly for up to twelve (12) months post-exit.

Follow-up Service: As defined in WIOA regulations Section 680.580(a), Follow-up Services are critical services provided following a youth’s exit from the WIOA Youth program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services align with the participant’s Individual Service Strategy and may include regular contact with a youth participant’s employer, including assistance in addressing work-related problems. Follow-up Services are provided for a minimum of twelve (12) months unless the participant declines to receive follow-up services or cannot be located or contacted. Follow-up services must include more than a contact to obtain follow-up data collection for performance reporting purposes.

C. Policy

1. Follow-up Services

- a. Follow-up Services are provided to all WIOA Youth program participants who exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up Services for youth may include the following elements:
 - i. Supportive services
 - ii. Regular contact with a youth participant’s employer, including assistance in addressing work-related problems
 - iii. Adult mentoring
 - iv. Financial literacy education
 - v. Provision of labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling and career exploration services
 - vi. Activities that help youth prepare for and transition to postsecondary education and training

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- b. Follow-up services may vary with the needs of the individual participant. Follow-up services align with the participant's Individual Service Strategy.
- c. Follow-up Services are provided for a minimum of twelve (12) months unless the participant declines to receive follow-up services or cannot be located or contacted.
- d. Follow-up Services may be provided beyond 12 months at the provider's discretion.
- e. Follow-up Services are initially offered after the program close-out is created in CTHires.
- f. 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.
- g. Follow-up Services are offered as needed but no less frequently than monthly for the first the twelve (12) months following program close-out. For participants who do not respond to follow-up contacts, monthly communication continues with at least two (2) attempts per month to contact the participant.
- h. 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 WIOA Youth participants who have exited the program.

- a. The following post-exit follow-up data are obtained and recorded on all WIOA Youth participants who have exited the program.
 - 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, Table B)

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

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- reserve military unit of the armed forces and are called to active duty for at least 90 days.
- e. The participant is in the foster care system as defined in 45 CFR 1355.20(a) and exits the program because the participant has moved from the local workforce area as part of such a program or system.

D. Procedures

1. Providing Follow-up Services
 - 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 or be successful in postsecondary education and training.
 - b. The type of services offered, and the frequency of contact are determined based on the needs of the individual and therefore may differ with each participant.
 - c. Minimum frequency of outreach to offer and/or provide Follow-up Services:
 - i. Monthly during the 12-month follow-up period following program close-out
 - ii. For participants who do not respond to follow-up contacts, monthly communication continues with at least two (2) attempts per month to contact the participant.
 - d. 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 other practical means most effective at reaching the participant.
 - e. Follow-up Services may include but are not limited to:
 - i. Supportive services
 - ii. Counseling about the workplace
 - iii. Regular contact with a youth participant's employer, including assistance in addressing work-related problems
 - iv. Adult mentoring
 - v. Peer support groups
 - vi. Financial literacy education
 - vii. Provision of labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling and career exploration services
 - viii. Information about education and/or training opportunities
 - ix. Activities that help youth prepare for and transition to postsecondary education and training
 - x. Referral to supportive services in the community
 - 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
 - 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,

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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
 - 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 post-secondary 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 training or 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-

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- 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 a WIOA Youth 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 a WIOA Youth 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.