

**August 29, 2019 | 11:30 a.m.**  
**Eddie Ausband and Randy Hayes, Co-Chairs**

### Welcome

### Public Comment

### Presentation

- Regional Economy Presentation – Mike Carnathan, Sr. Manager of Research & Analytics Group – Atlanta Regional Commission

### ARWDB Action Items

- Consent Agenda, Approval of May 23, 2019 Meeting Minutes
- Approve the Revised Support Services Policy for Youth and Adult/Dislocated Worker
- Authorize the Director of the ARWDB to lower the cap for Support Services for PY19 from \$5,000.00 to \$3,000.00
- Approve the Business Services Priority of Service Policy
- Approve the new Disability Employment Services Policy
- Approve the NextGen Program Work Experience Policy

### ARWDB Reports & Discussion

- PY19 Budget Review
- One Stop Manager's Report
- Executive Committee
- NextGen Committee
- Business Services Committee
- Directors Report

**NEXT MEETING: October 17, 2019**

**Location: Gwinnett Career Resource Center**

## ARC COMMITTEE MEETING FOLLOW-UP

### **ATLANTA REGIONAL WORKFORCE DEVELOPMENT BOARD**

*May 23, 2019 Meeting Notes*

#### **Members Present**

Mr. Eddie Ausband	Mr. Rodney Leonard
Mr. Mandy Chapman	Mr. Chuck Little
Mayor Eric Dial	Mr. Lindsay Martin
Mr. Robert Duffield	Mr. Trey Ragsdale
Ms. Margie Ensley	Ms. Stephanie Rooks
Mr. Randy Hayes	Mr. Aundra Walthall
Ms. Lee Hunter	

#### **Members Absent**

Ms. Sonia Carruthers	Mr. Stephen Schultheis
Mr. James Jackson	Ms. Debbie Slaton
	Mr. Steven Wilson

*Quorum met: 12 of 18 (Majority Required)*

#### **Guests**

Ms. Darrlynn Alston, Rocket Camp  
Ms. Brenda Beverly, Manager, Career Resource Center - Gwinnett Tech  
Mr. Haydn Brathwaite, Atlanta Regional Commission – Worksource Atlanta Regional  
Mr. Henry Charlot, Atlanta Regional Commission – Worksource Atlanta Regional  
Mr. Rob Cherof, Rocket Camp  
Ms. Carlethia Collier, ResCare, One-Stop Operator  
Ms. Lisa Davis, Atlanta Regional Commission – Worksource Atlanta Regional  
Ms. Itohowo Ekanemesang, Georgia Vocational Rehabilitation Agency  
Mr. Mark Goodman, Greater North Fulton Chamber of Commerce  
Ms. Christine Grigsby, ResCare  
Ms. Dorothy Herzberg, Manager, Career Resource Center - Clayton  
Ms. Juanita Horsey, Career Resource Center - Gwinnett  
Mr. Rob LeBeau, Atlanta Regional Commission – Worksource Atlanta Regional  
Ms. Marsharee O'Connor, Atlanta Regional Commission – Worksource Atlanta Regional  
Ms. Thania Saintil, Atlanta Regional Commission – Worksource Atlanta Regional  
Mr. James Wilburn, Clayton County Public

ARWDB Board Co-Chair, Randy Hayes, called the Board Meeting to order at 12:01 p.m.

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There were no requests for public comment.

1. Robert Duffield made the following motion:

**MOTION: To approve the minutes of the March 14, 2019 meeting.**

The motion was seconded by Trey Ragsdale and unanimously approved.

2. The Executive Committee of the ARWDB approved the following motion:

**MOTION: To approve the PY19 WorkSource Atlanta Regional budget in its entirety, to authorize staff to update the PY19 budget when actual funding amounts are determined with a staff update provided at the next scheduled ARWDB meeting, and to authorize staff to transfer funds between Dislocated Worker to Adult line items as needed.**

The motion was unanimously approved (Trey Ragsdale abstained due to conflict of interest).

3. The Executive Committee of the ARWDB approved the following motion:

**MOTION: To approve the PY19 Provider Contract Extensions through June 30, 2020.**

The motion was unanimously approved (Stephanie Rooks and Trey Ragsdale abstained due to conflict of interest).

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Robert Cherof, President – Rocket Camp, presented the WorkSource Market Implementation plans for WorkSource Atlanta Regional. The plan presented is designed to reach two groups: Job Seekers and Employers in the Atlanta area counties (Cherokee, Clayton, Douglas, Fayette, Gwinnett, Henry, and Rockdale).

The meeting was adjourned at 1:23 p.m.

NEXT ARWDB MEETING: August 22, 2019 at the office of the Atlanta Regional Commission



DATE: August 6, 2019

TO: Atlanta Regional Workforce Development Board

FROM: Rob LeBeau, Director - ARWDB

**SUBJECT: REVISED – Support Services Policy**

**Requested Action**

Approval of revised Support Services policy authorizing reducing the maximum amount per participant per year from \$5,000 to \$3,000 per year.

**Reason**

The ARWDB adopted Support Services policies for WIOA Youth and Adult/Dislocated Worker participants that caps the maximum amount at \$5,000 per person, per year. This policy allows adults, dislocated workers, and youth to receive support services funding while participating in training activities. Support services funding is provided to participants to ease the financial burden related to attending training, such as transportation costs, child care, meals, and tools or equipment.

In PY2018, 781 participants received some form of support services funding for a total cost of \$982,202. The average amount per person was \$932 and the median cost was \$228. These funds were used primarily for costs related to transportation (70%), child care (21%), and youth incentives (5%). Approximately 12% of participants received support services funding between \$3,000 and \$5,000.

Support services are an allowable expense of WIOA funds, up to 35% of a local workforce development board's funding. The provision of support services funding is optional, with the maximum amount provided varying by local area, and some areas providing no support services funding at all.

WIOA funding to the State of Georgia and passed along to the local workforce development boards has been trending down over the last three years. This reduction in funding coupled with less carryover from PY2018 has resulted in a constrained operating budget at the start of the program year. In order to ensure ARWDB programs and services are operated in the most effective manner possible and continue without interruption, staff recommends a series of cost containment measures, including a reduction in the maximum amount provided to customers for support services.

**Timeframe**

The reduction in funding will become effective for new WIOA participants on September 1, 2019. The ARWDB Director and staff will review relevant data annually – such as overall budget, support services usage, average support services allocations – to determine if adjustments in the maximum cap should be adjusted. Future adjustments will become effective at the start of the program year (July 1<sup>st</sup>), unless extenuating circumstances arise to justify a change during the year (i.e. significant budget shortfall). Mid-year adjustments will be recommended by the ARWDB Director and confirmed by the ARWDB Executive Committee.

**Impact**

Newly enrolled WIOA participants will have a maximum amount of support services of \$3,000 instead of \$5,000 for the remainder of PY19. Existing participants with authorized expenses over \$3,000 will not be affected. Adjustments may be made in future program years as warranted, but not to exceed \$5,000 per person per year.

**Recommendation**

To approve amendments to the Youth and Adult/Dislocated Worker support services policies by adding the following language:

The ARWDB Director is authorized to adjust the maximum amount of support services funding allowable per person per year (not to exceed \$5,000) to ensure ARWDB programs and services are operated in the most effective manner possible. The ARWDB Director will review relevant data annually to determine if adjustments in the maximum cap should be adjusted. Future adjustments will become effective at the start of the program year unless extenuating circumstances arise to justify a change during the year. If warranted, mid-year adjustments will be recommended by the ARWDB Director and confirmed by the ARWDB Executive Committee.

**NOTE: The action coming from Executive Committee is twofold: 1) approve the above change; 2) authorized a mid-year adjustment to \$3,000 effective September 1, 2019.**

## ADULT/ DISLOCATED WORKER SUPPORT SERVICE POLICY

The Atlanta Regional Workforce Development Board (ARWDB) has developed a process by which participants who are determined eligible and in need of supportive services may participate in Workforce Innovation & Opportunity Act (WIOA) activities. Federal Law states that supportive service costs should be necessary to enable an individual to participate in activities authorized under WIOA Title I. Eligibility and determination of need for supportive services should be conducted by a case manager, on a case-by-case basis and may be provided to individuals receiving Basic Career Services. Such individuals must be registered as WIOA participants and are subject to performance outcomes.

Total supportive services may not exceed \$5,000 per participant per program year. There is also a limit on total supportive service expenditures of 35% of each Local Workforce Development Area (LWDA) funding stream, (i.e. adult, dislocated worker, youth), program year total allocation. Waivers for this policy will be issued by Technical College Systems of Georgia (TCSG - OWD) on a case by case basis. The following policy applies to participants enrolled under the youth, adult/dislocated worker programs under WIOA which include career services and Individual Training Account (ITA)-based training, and which are served by ARWDB Career Resource Centers.

The ARWDB Director is authorized to adjust the maximum amount of support services funding allowable per person per year (not to exceed \$5,000) to ensure ARWDB programs and services are operated in the most effective manner possible. The ARWDB Director will review relevant data annually to determine if adjustments in the maximum cap should be adjusted. Future adjustments will become effective at the start of the program year unless extenuating circumstances arise to justify a change during the year. If warranted, mid-year adjustments will be recommended by the ARWDB Director and confirmed by the ARWDB Executive Committee

### Documentation of Eligibility and Determination of Need for Supportive Services

All supportive services must be approved and recorded in Georgia Work Ready Online Participant Portal (GWROPP) prior to the participant receiving or obtaining the goods or services. Backdated requests for services will not be approved. A participant may waive WIOA payments (except for Work Experience) if accepting payment would mean the loss of benefits. The participant may request the payment to start at a later date but may not claim retroactive payments. Advances against future payments are not allowed.

To be eligible for any WIOA financial assistance payments, participant must have been determined WIOA eligible and:

1. Be participating in career services and/or training services. Exception: Limited supportive services may be provided to eligible applicants (e.g. paying for a birth certificate), before they are enrolled as participants, to permit participation in assessment activities;
2. Be unable to obtain supportive services through other programs providing such services; and

3. Must comply with program regulations and policies during the period of training and/or enrollment to continue to receive support service payments.

### Determination of Need

A. Financial/Physical Need: There must be documentation in the participant's case file and/or the GWROPP system that participants are incapable of providing these services for themselves. Documentation may consist of:

1. Low income verification
2. Receipt of federal or state public assistance
3. Receipt of UI benefits
4. Documentation of skill upgrading that would lead to employment in a local or state in-demand occupation
5. Documentation of lack of employment or underemployment
6. Separation from employment notice
7. Transportation distance to attend training
8. Birth certificates of children receiving childcare

B. Resource Coordination: There must be documentation that supportive services are not available from other state or federal grant programs. There must be analysis of all federal/state/local resources available and how they are being coordinated. For example, an ARWDB analysis of need form will document the total basis of need considering UI, Pell, Hope etc., or other instances of federal/state/local resources available, to determine how resources are being coordinated. Examples of acceptable documentation:

1. Participant time sheets
2. Income determination
3. UI records
4. Supportive Services Request Form

### Allowable Supportive Service

Allowable supportive services provided during training include, but are not limited to:

1. Transportation
2. Childcare
3. Meals during the training day
4. Emergency Auto Repair (The repair must be necessary and the most economical options for the participant's transportation needs)
5. Emergency Healthcare (The payments are only provided when necessary for the participant to participate in training), and
6. Emergency Utility and Rental Assistance (The payments are only provided when necessary for the participant to participate in training.)

Support Service Request Form: Each participant requesting supportive services will complete a request for support service form. The WIOA career advisor will determine the basis of need and sign off on the justification for the amount of support that is necessary and reasonable to complete WIOA activities. This justification will include a projection of the quarterly amounts as well as the total anticipated amount of support services requested. This documentation should be collected and included in the participant's case file and the GWROPP system. WIOA career advisors are responsible for tracking payments, to ensure compliance with the \$5,000 limitation. ARC finance will also maintain records to monitor the yearly cap limitations. Yearly child care cost must be projected before training services begin. No payments will be made until previous payment is uploaded into GWROPP.

All documentation of each supportive payment type and amount must be entered in the GWROPP system to include the type of support service, amount, date of service, etc. All documentation will be downloaded to the GWROPP system or maintained in another system and physical case file (participant time sheets, etc.). All supportive information must be updated and complete at the end of each fiscal quarter for all participants receiving support services in the fiscal quarter. AWRDB staff will perform a secondary review and reconciliation of participant information in GWROPP to ensure the portal and case files reflect an accurate account for the supportive services provided on a quarterly basis.

Additionally, documentation for the WIOA activity for which support is being provided must be included in the case file and scanned into the GWROPP system. Documentation should include time sheets signed by the instructor/supervisor, proving participation in training services.

### Dependent Care

If dependent care is not otherwise available from Department of Family and Children Services (DFCS), or other funding sources, ARWDB may reimburse the cost of care for dependent children under age 6 or adult dependents with documented care needs, up to a maximum of \$70 per week per dependent, excluding late fees. This is available while the participant is enrolled in basic career services or an ITA training service. Assistance is available when the individual is scheduled and/or commuting to training activities. Assistance may also be available for children ages 6 through 14 during times when school is not in session. Funds from other sources, such as TANF, may be combined with WIOA funds with written approval by the Career Resource Center Manager. In those instances, WIOA funds may only be used for those expenses not covered by the other funding source. For participants receiving TANF benefits, service providers must document that the participant is not receiving dependent care benefits from TANF before providing dependent care assistance through WIOA.

For each dependent child ages 6 through 14, a maximum of \$45 per week per child may be provided to assist with after school care while a participant attends or commutes to scheduled training activities. A full-time rate of \$70 per week for each dependent child through age 14 may be provided during summer school break.



Participants are encouraged to use licensed dependent care providers whenever possible. If not licensed, the service must be provided by a dependent care provider who cares for children outside of the participant's home.

Dependent care costs will be paid directly to the provider if at all possible. However, under certain circumstances the cost may be reimbursed to the customer. Payments are based on receipts from the dependent care provider and include verification of a child's attendance record and verification of class attendance by the participant. Payments will be made monthly and will depend on timely receipt of the specified documentation.

ARWDB will reimburse up to \$45 per child for a one-time registration fee if this fee is customarily charged by the dependent care provider to all clients. No reimbursements will be made for late fees incurred by participants.

### Meals and Transportation

For each day a participant attends class for a minimum of 3 hours daily, \$12 may be provided to assist with meals and transportation expenses. Meals and Transportation assistance is not available if provided by another agency such as DFCS.

### Emergency Assistance

Emergency assistance is defined as payments made on behalf of a WIOA customer to help with problems that would impact his or her continuation in and/or completion of a program. Emergency assistance can be provided for but not limited to, the following:

- Emergency car repairs
- Emergency healthcare
- Emergency utilities (power, heating fuel) & rent

Emergency car repair may be provided if the car is no longer safe, is the only means of transportation to and from training and is owned by the customer.

The customer will be required to obtain three (3) written quotes for repairs, not exceeding 25% of the tax value of the vehicle or \$500, whichever is lower.

Emergency eye glasses or protective eyewear (healthcare) may be provided if there are no other resources available to provide the eyewear, and the customer cannot see. Broken eyeglasses may be replaced if the customer cannot afford to replace them and cannot attend classes.

Emergency utility payment is defined as the deposit and one month's payment for electricity or heating fuel for a customer. Emergency rental assistance is available one time per program enrollment. Past due rent is allowable. Deposits are not allowable because the amount may be reimbursed to a participant at a later date. Supportive services request for the payment of rent requires the following supporting documentation:

1. A rental or lease agreement bearing the participant's name, and
2. An original statement signed by the landlord reflecting the amount of rent due and the corresponding dates.
3. If a participant does not have a formal lease with a landlord, a notarized letter stating the name of the participant, the address of the property, and the amount of delinquency is required.

#### Additional Allowable Support Services:

Allowable supportive services provided after training in order to obtain employment include, but are not limited to:

1. Tools, work clothing, and boots/shoes required for employment
2. Bonding and liability insurance for employment
3. Drug testing required by employer
4. Financial counseling, and
5. Auxiliary aides and services necessary for persons with disabilities.

For participants enrolled in programs such as HVAC, automotive technology and automotive collision, which require expensive tools for training as well as employment, supportive services may be used to supplement tool purchase costs during training in the event the participant's training ITA funds are exhausted by tuition, books, fees and other training costs. This determination will be made on a case by case basis by the Career Resource Center Manager.

#### Other Requirements and Policies

A participant continues to be eligible for support services only as long as he/she is active in the program. Participants will be required to "recertify" with their Career Advisor every 90 days to ensure compliance and continued need of support services. Failure to participate fully, without good cause, will result in termination of assistance.

During the assessment period individual needs are identified and a plan is developed and documented in the Individual Employment Plan (IEP) for support provided by ARWDB, DFCS or other programs. To maximize the support available, ARWDB will actively promote coordination with organizations to provide supportive services at no cost to the program or the participant. These services could include assistance in housing, legal problems, financial planning, dental/medical care, mental health, and other areas.

#### Unallowable Supportive Services

Payments are not allowed for titled or deeded items or when recovery of the expense is anticipated. Such items include:

1. Rent deposits or housing deposits
2. Mortgage payments
3. Car payments
4. Purchase of vehicles
5. Fines



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## **SUPPORTIVE SERVICES**

### **NextGen Program Policy: NGPP 03-03**

**ARWDB Approved:**

**DATE:** August 6, 2019 *(Revised)*  
**TO:** ARC/ARWDB Staff & NextGen Service Providers  
**FROM:** Marsharee O'Connor, NextGen Program Director  
**SUBJECT:** **Guidance & Guidelines for Supportive Services Assistance**

### **1 – CONTENTS**

This section outlines the number and title associated with each section throughout the document.

- |  |                                    |
|--|------------------------------------|
| 2. Purpose   | 8. Allowable Supportive Services   |
| 3. Policy  | 9. Unallowable Supportive Services |
| 4. Provisions  | 10. Concurrent Enrollment          |
| 5. Twelve Months Follow-Up Period                          | 11. Definitions                    |
| 6. Eligibility and Determination of<br>Need Assessment     | 12. Attachments                    |
| 7. Documentation of Eligibility &<br>Determination of Need | 13. Inquiries                      |
|  | 14. Policy Effective Date          |

### **2 – PURPOSE**

To establish a policy providing guidance and guidelines in the provision of Title 1-B, WIOA sec. 129(c)(2), Youth Program 14 Element, 20 CFR § 681.570, Youth Supportive Services. The policy serves to establish a process for identifying need and providing supportive services assistance to participants receiving WIOA services. As defined in WIOA sec. 3(59), the available supportive services activities enable an individual to continue to have access to employment, education and training opportunities to succeed in the labor market.

### **3 – POLICY**

Supportive services are one of the 14 program elements options available under WIOA youth services. Supportive services may be made available to participants during enrollment in WIOA Title-I activities and/or after WIOA program exit (during the 12-months follow-up) period. To

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#### **REFERENCES:**

*State (TCSG) Workforce – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15 and 21-16*

*NGPP – Incentive Policy 04-01*

ensure coordination across programs, non-duplication of resources and services, and to establish limits on the amount and duration of services between Title-I programs, supportive services for the NGP must align with the Adult and Dislocated Workers Programs. **The total amount of Supportive Services MAY NOT exceed \$5,000 per participant, per program year unless approved by ARC prior to providing the assistance.**

- ❖ ***The supportive services cap of \$5,000 also INCLUDES the incentive cap of up to \$500 as outlined in the NGP Incentive Policy 04-01.***

Participants must first obtain supportive services through other programs before relying on WIOA Title-I funding. Career Advisors will assist participants to work with other programs to ensure they receive all the benefits to which they are entitled to under the law.

The ARWDB Director is authorized to adjust the maximum amount of support services funding allowable per person per year (not to exceed \$5,000) to ensure ARWDB programs and services are operated in the most effective manner possible. The ARWDB Director will review relevant data annually to determine if adjustments in the maximum cap should be adjusted. Future adjustments will become effective at the start of the program year unless extenuating circumstances arise to justify a change during the year. If warranted, mid-year adjustments will be recommended by the ARWDB Director and confirmed by the ARWDB Executive Committee

#### 4 – PROVISIONS

Supportive services must be issued in accordance with the requirements contained in the Cost Principles in 2 CFR Part 200 (be reasonable and necessary, both in cost and in items being purchased), and be necessary for participation in career or training activities or the success of the Service Plan (ISS/ISP/IEP). Supportive services will only be provided when the individual is unable to obtain supportive services through another program that provides such services. To prevent duplication of resources and services, services available through other agencies will be researched, explored and utilized prior to using WIOA funds. The Career Advisor will access services available in the community and make all efforts to access those services at no, or low cost to the participant.

Any assessments, tests and/or supportive services provided to the participant must be documented in the participant's Service Plan. Also, all supportive services must have been approved and recorded in the WorkSource Portal/VOS prior to the participant receiving or obtaining the goods or services. Backdated requests for services **WILL NOT** be approved.

- ❖ The provisions of supportive services related to duration, time and type outside of what is addressed in this policy will be considered on a case -by-case basis.

#### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15 and 21-16*

*NGPP – Incentive Policy 04-01*

## 5 – TWELVE MONTHS FOLLOW-UP PERIOD

To ensure success after the program, supportive service may be provided to participants who exit the WIOA program and are in the 12- months follow-up period as defined in 20 CFR § 681.580. This is to ensure educational retention for those who are attending advance training (non-WIOA funded) or post-secondary school; and job retention, wage gains, and career progress for those who obtain unsubsidized employment. The approval process is the same as for participants in active status. Support service shall commence no earlier than participant's WIOA enrollment date and shall end upon completion of the 12-months follow-up period.

## 6 – ELIGIBILITY AND DETERMINATION OF NEED ASSESSMENT

### **ELIGIBILITY:**

To be eligible for any WIOA financial assistance payments, participant must have been determined WIOA eligible and:

1. Be participating in career services and/or training services;
  - ❖ ***EXCEPTION – Limited supportive services (such as paying for copies of the social security card or birth certificate, etc.) may be provided to individuals who are not yet enrolled in WIOA. This type of supportive services enables the individuals to successfully participate in assessment activity as well as to complete the eligibility certification requirements for WIOA enrollment. Once enrolled in WIOA, the supportive services amount spent prior to WIOA enrollment will also count towards the \$5,000 cap indicated above.***
2. Be unable to obtain supportive services through other programs providing such services; and
3. Must comply with program regulations and policies during the period of training and/or enrollment to continue to receive supportive services payments.

### **DETERMINATION OF NEED:**

1. **Financial/Physical Need** – There must be documentation in the participant's physical case file and the WorkSource Portal/VOS that demonstrates that the participant is incapable of providing these services for him/herself. Documentation may consist of:
  - a) Low income status as documented by family/household income determination.
  - b) Receipt of federal or state public assistance.
  - c) Receipt of UI benefits.

### **REFERENCES:**

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

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*NGPP – Incentive Policy 04-01*

- d) Documentation of skill upgrading that would lead to employment in a local or state in-demand occupation.
  - e) Documentation of lack of employment or underemployment.
  - f) Separation from employment notice.
  - g) Birth certificates of children receiving childcare.
  - h) Transportation distance to attend training.
2. **Resource Coordination** – There must be documentation that supportive services or funds for those services are not available from other state or federal grant programs. There must be analysis of all federal/state/local resources available and how they are being coordinated. For example, an ARC/ARWDB analysis of need form will document the total basis of need considering UI, Pell, Hope Grant/Scholarship etc., or other instances of federal/state/local resources available, to determine how resources are being coordinated. Examples of acceptable documentation:
- a) Participant time sheets or attendance record, to demonstrate active participation in WIOA activity/services (signed and dated by the participant and the instructor/supervisor providing training/WEx services).
  - b) Income Determination, to demonstrate the participant's is incapable of providing these services for him/herself
  - c) UI records, to demonstrate the income as well as if the funding were exhausted.
  - d) Application for applicable state and federal funds, to demonstrate that funding through those entities were denied or exhausted.
  - e) Supportive Services Request Form, to demonstrate the type of supportive services requested, justification of the requested amount, how the funds will assist the participant, and the time frame the supportive services will be provided (signed and dated by the participant and the Career Advisor).

EXCEPT for WEx related activities, a participant may waive WIOA supportive services assistance payment, if accepting payment would mean the loss of benefits. The following two provisions apply:

- The participant may request the assistance payment to start at a later date, but MAY NOT claim retroactive payments for those assistance.
- Advances against future assistance payments ARE NOT allowed.

#### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15 and 21-16*

*NGPP – Incentive Policy 04-01*

## 7 – DOCUMENTATION OF ELIGIBILITY & DETERMINATION OF NEED

**Support Service Request Form:** Each participant requesting supportive services must complete a “Supportive Services Request Form”. The Career Advisor will determine the basis of need and sign off on the justification for support that is necessary and reasonable to complete WIOA activities. For additional information regarding the WorkSource Portal/VOS documentation, see “ELIGIBILITY AND DETERMINATION OF NEED ASSESSMENT” section of this document.

- Justification – Must include the WIOA activity for which supportive services is being provided, a projection of the quarterly amounts as well as the total anticipated amount of supportive services requested. Also, the requested form must be collected and included in the participant’s physical case file as well as uploaded to the WorkSource Portal/VOS.

All documentation of each supportive services payment type and amount must be entered in WorkSource Portal/VOS under the appropriate service activity code to include the type of support service, amount, date of service, etc. Supportive services data and document requirements for the WorkSource Portal/VOS are:

1. Documents to be uploaded – “Support Service Request Form” and any validation of proof of service.
2. Service Plan – Include goal(s) or objective(s) tied to the Supportive Services need as well as the plan of action to deliver said services.
3. Case-notes – All attempts to secure other funding as well as issuance of supportive services must be noted under the case-notes section.
4. Service Activity Code – The appropriate service activity code must be assigned. This section will be used to enter the payment type and amount of supportive services:
  - a) 480 Support Service – Child/Dependent Care.
  - b) 481 Support Service – Transportation Assistance
  - c) 482 Support Service – Medical.
  - d) 483 Support Service – Temporary Shelter
  - e) 485 Support Service – Other
  - f) 486 Support Service – Counseling

Career Advisors are responsible for tracking payments, to ensure compliance with the \$5,000 limitation. ARC/ARWDB Finance staff will also maintain records to monitor the yearly cap limitations. All supportive services information in the WorkSource Portal/VOS must be updated

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### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

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*NGPP – Incentive Policy 04-01*

and completed at the end of each fiscal quarter for all participants receiving supportive services in the fiscal quarter. ARC/ARWDB NGP staff will perform a secondary review and reconciliation of participants' information in the WorkSource Portal/VOS to ensure the case management system and physical case files reflect an accurate account for the supportive services provided on a quarterly basis.

## 8 – ALLOWABLE SUPPORTIVE SERVICES

### 1. Linkages to Community Services

Assistance may be provided for participants needing linkages, referrals, and information about the availability of supportive services assistance not covered by WIOA. These services may include, but are not limited to: SNAP (Food stamps), TANF, veteran's assistance, financial assistance for education, and other public assistance funds.

### 2. Assistance with Transportation

Assistance (gas for personal vehicle, public transportation, etc.) may be approved for up to \$100.00 per month. Costs for other transportation services such as taxis, private transportation firms, and company vehicle usage charges will be reimbursed at a maximum amount of \$50.00 per month. Additional expenses may be approved by the ARC/ARWDB NGP Director for extenuating circumstances.

- For the WEx activity, mileage reimbursement may be available for participants who commute to and from a work site or training site for which no other form of transportation is reasonably available. Mileage reimbursement may be allowed up to the first 14 calendar days to support the participant's participation in WEx. Map mileage (calculated using an online map program) may be used as the basis for payment.
- ***Supportive services expenditures provided during WEx, according to TEGL 21-16, (except for incentives – see NGP Incentive Policy 04-01) CANNOT be counted toward the WEx expenditure requirement even if supportive services assist the participant in participating in the WEx.***

### 3. Assistance with Child Care and Dependent Care

Child care and dependent care assistance may be provided to participants who are not able to participate in WIOA programs without such assistance. This includes participants who are in danger of dropping out or making less than satisfactory progress due to unsatisfactory or unreliable childcare/dependent care arrangements. Funds from other sources, such as DFCS or TANF, may be combined with WIOA funds with written approval by the ARC/ARWDB NGP Director. In those instances, WIOA funds may only be used for those expenses not covered

#### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15 and 21-16*

*NGPP – Incentive Policy 04-01*



by the other funding source. For participants receiving TANF benefits, NGSPS must document that the participant is not receiving dependent care benefits from TANF before providing dependent care assistance through WIOA.

- If dependent care is not otherwise available from DFCS, TANF or other funding sources, assistance may be available and NGP may reimburse the cost of:
  - Care for dependent children under age 6 or adult dependents with documented care needs, up to a maximum of \$70 per week per dependent (excluding late fees) while the participant is enrolled in basic career services or an ITA training service during times when the individual is scheduled and/or commuting to training activities.
  - Care for children ages 6 through 14 during times when school is not in session. For each dependent child ages 6 through 14, a maximum of \$45 per week per child may be provided to assist with after school care while a participant attends or commutes to scheduled training activities. A full-time rate of \$70 per week for each dependent child through age 14 may be provided during summer school break.
- Participants are encouraged to use licensed dependent care providers whenever possible. If not licensed, the service must be provided by a dependent care provider who cares for children outside of the participant's home.
- Dependent care costs will be paid directly to the dependent care provider if possible. However, under certain circumstances the cost may be reimbursed to the customer. Payments are based on receipts from the dependent care provider and include verification of a child's attendance record and verification of class attendance by the participant. Payments will be made monthly and will depend on timely receipt of the specified documentation.
- ARC/ARWDB will reimburse up to \$45 per child for a one-time registration fee if this fee is customarily charged by the dependent care provider to all clients. No reimbursements will be made for late fees incurred by participants.

#### **4. Assistance with Educational Testing**

Assistance is authorized for the payment of application fees to educational institutions. These are fees that are paid to determine a participant's eligibility and acceptance at the educational institution which will allow the participant to obtain information on financial aid awards. Assistance with books, fees, school supplies, and other necessary items for the students enrolled in post-secondary education classes are authorized as well.

#### **REFERENCES:**

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15 and 21-16*

*NGPP – Incentive Policy 04-01*

- Tuition assistance will be reviewed for approval on a case-by-case basis by ARC/ARWDB NGP Director.

## 5. Reasonable Accommodations for Individuals with Disabilities

Assistance to enable an individual with a disability to gain access to participate in employment and training services.

- ❖ ***It is NOT allowable to use WIOA supportive services funds to make capital improvements to a training facility or worksite for general compliance with the requirements of the Americans with Disabilities Act of 1990.***

## 6. Meals

For each day, a participant attends class for a minimum of 3 hours, \$6 may be provided to assist with meal expenses. Meal assistance is not available if provided by another agency such as DFCS.

## 7. Emergency Assistance

Defined as payments made on behalf of a WIOA participant to help with problems that would impact his/her continuation in and/or completion of a program. Emergency assistance can be provided for but not limited to, the following:

- Emergency car repairs.
- Emergency healthcare.
- Emergency utilities (power, heating fuel).
- Emergency housing.

Emergency Car Repairs – May be provided if the car is no longer safe, is the only means of transportation to and from training and is owned by the customer. The customer will be required to obtain three (3) written quotes for repairs, not exceeding 25% of the tax value of the vehicle or \$500, whichever is lower.

Emergency Healthcare – Assistance is authorized for healthcare and medical services. This assistance is not intended to cover the costs of major issues such as major surgery or major dental care, and is not intended to encourage visits to healthcare centers or doctors for minor illnesses for which the participant would not normally seek medical attention. Eye glasses or protective eyewear may be provided if there are no other resources available to provide the eyewear, and the customers vision is impaired. Broken eyeglasses may be replaced if the customer cannot afford to replace them and cannot attend classes. Emergency healthcare must not exceed \$500.

## REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15 and 21-16*

*NGPP – Incentive Policy 04-01*

Emergency Utilities – Payment is defined as one month’s payment for electricity or heating fuel for a customer. Deposits are not allowable because the amount may be reimbursed to a participant later. Since this is a one-time emergency intervention, a plan must be established to ensure the participant will be able to meet long term utility needs. Emergency utility payments must not exceed \$500.

Emergency Housing – Assistance may be provided to participants on a case-by-case basis and require prior approval from ARC/ARWDB NGP Director. The assistance may include cost for rent and temporary housing. Past due rent is allowable. Deposits are not allowable because the amount may be reimbursed to a participant at a later date. Since this is a one-time emergency intervention, a plan must be established to ensure the participant will be able to meet long term housing needs. Assistance may not exceed \$1000 for one month or no more than \$1800 to include one month’s back rent. Requests for the payment of rent requires the following supporting documentation:

- A rental or lease agreement bearing the participant's name, and
- An original statement signed by the landlord reflecting the amount of rent due and the corresponding dates.
- If a participant does not have a formal lease with a landlord, a notarized letter stating the name of the participant, the address of the property, and the amount of delinquency is required.

## **8. After Training Assistance**

Allowable supportive services provided after training to obtain employment include, but are not limited to:

- Tools, uniforms, other work clothing, and boots/shoes required for employment (also includes eyeglasses and protective eye gear);
- Bonding and liability insurance for employment;
- Drug testing required by employer;
- Financial counseling; and
- Auxiliary aides and services necessary for persons with disabilities.

For participants enrolled in programs such as HVAC, automotive technology and automotive collision, which require expensive tools for training as well as employment, supportive services may be used to supplement tool purchase costs during training in the event the participant’s training ITA funds are exhausted by tuition, books, fees and other training costs.

### **REFERENCES:**

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15 and 21-16*

*NGPP – Incentive Policy 04-01*

- ❖ This determination will be made on a case by case basis by the ARC/ARWDB NGP Director.

**NEEDS-RELATED PAYMENTS** – Though needs-related payments as described in 20 CFR § 680.930 through § 680.970 WIOA, sec. 134(d)(3) and § 681.570 WIOA, sec. 129(c)(2) are an allowable supportive service authorized to provide financial support to participants (out-of-school and 18 – 24 years) for the purpose of enabling them to participate in training, ARC/ARWDB does not provide such support.

## 9 – UNALLOWABLE SUPPORTIVE SERVICES

Payments **ARE NOT** allowed for titled or deeded items or when recovery of the expense is anticipated. Unallowable supportive services include:

- Rent deposits or housing deposits;
- Mortgage payments;
- Car payments;
- Purchase of vehicles;
- Fines;
- Current or past taxes;
- Current or past child support;
- Legal fees (except fees for legal aid) such as bail and restitution; and
- Payment toward goods or services incurred or received prior to the participant's enrollment in WIOA.

## 10 – CONCURRENT ENROLLMENT

In accordance with 20 CFR § 680.430, NGP participants may concurrently co-enroll in NGP and the Adult Program and can receive supportive services from both programs' funding stream. However, supportive services cannot be duplicated, and the maximum \$5,000 program year limit includes cumulative funds awarded from both the NGP and Adult Programs.

## 11 – DEFINITIONS

- |   |  |
|---|--|
| ▪ <b>ARC</b> – Atlanta Regional Commission                    | ▪ <b>DFCS</b> – Department of Family and Children Services |
| ▪ <b>ARWDB</b> – Atlanta Regional Workforce Development Board | ▪ <b>WorkSource Portal/VOS</b> –Virtual OneStop System     |
| ▪ <b>CFR</b> - Code of Federal Regulations                    |  |

### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

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*NGPP – Incentive Policy 04-01*

- **HVAC** – Heating, Ventilation and Air Conditioning
- **Service Plan (ISS/ISP/IEP)** – Individual Service Strategy/ Individual Service Plan/ Individual Employment Plan
- **ITA** – Individual Training Account
- **NGP** – NextGen Program
- **NGPP** – NextGen Program Policy
- **NGSP** – NextGen Service Provider
- **OJT** – On-the-Job Training
- **Sec./ §** – Section
- **SNAP** – Supplemental Nutrition Assistance Program
- **TANF** – Temporary Assistance for Needy Families
- **TEGL** – Training and Employment Guidance Letter
- **UI** – Unemployment Insurance
- **WEx** – Work Experience
- **WIG PS** – Workforce Implementation Guidance Programmatic Services
- **WIOA** – Workforce Innovation and Opportunity Act

## 12 – ATTACHMENTS

The following document is included as an attachment to the Policy:

- Supportive Services Request Form

## 13 – INQUIRES

Inquiries regarding this Policy and its guidance should be directed to an ARC NextGen Program staff.

## 14 – POLICY EFFECTIVE DATE

This policy shall be effective upon the ARWDB Approval date indicated on the first page of this document, and will remain in effect until further notice.

### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual 05/17/2019)*

*WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15 and 21-16*

*NGPP – Incentive Policy 04-01*

DATE: July 31, 2019

TO: Atlanta Regional Workforce Development Board

FROM: Rob LeBeau, Director - ARWDB

SUBJECT: Priority of Service for Work-based Learning Contracts

**Requested Action (What)**

Provide guidance on the Priority of Service for work-based learning contracts in the event there is not sufficient budget to satisfy demand.

**Reason (Why)**

In view of the reduction in budget for the Program Year ending June 30, 2020, it is possible that requests for work-based learning programs could exceed the available Business Services budget of \$648,000. adopted at the May 23 Board meeting. If this becomes necessary, guidelines are needed for when the dollar amount of contracts and commitments should be limited. Current policy allows for OJT contracts to be written for up to \$120,000 annually; and up to \$100,000 for all other work-based learning programs. The current practice is to write all contracts for not more than \$100,000; which is the amount that can be signed by the ARC Executive Director without the Board Chairman's signature. This practice allows us to be more responsive by shortening the contract turnaround time. It is noted that individual contracts rarely reach that amount. In the last 3 years, only one IWT contract totaled \$100,000; and only one of OJT contract approached this amount in a single year. In that our customer base ranges from small local companies with fewer than 5 employees up to large multi-national corporations, there is no "typical" amount. It is rare however, for a single company to receive more than \$50,000 in one year. We do however have several proposals under development that could reach the 6-figure amount.

**Timeframe (When)**

In that the program year is just beginning, the impact is not immediate and may never materialize. However, should the demand approach the budgeted amount, it will be necessary to limit the dollar amount of contractual commitments.

**Impact (Who and How Much)**

WIOA business customers seeking to use the On-the-Job (OJT), Incumbent Worker (IWT), Customized (CT) and Workplace Fundamentals (WF) Training programs would be affected. Both job seekers and existing employees who could benefit from skills improvement would also be negatively impacted in that a smaller number of trainees would be allowed under our contracts. Users of the Registered Apprenticeship (RA) program would also be affected in that they include an OJT component with longer training periods and cost caps and/or an IWT component. The decreased funding limits could also indirectly affect the business recruitment efforts of area Development Authorities, in that some advise prospects of the availability of WIOA program funding in their offer letters. Similarly, our Sector Partnerships Initiative could be affected in that a consortium of companies with similar needs would have a smaller pool of available dollars to implement common training programs.

## Recommendation

The following Priority of Service is recommended in the event the budget is not sufficient to satisfy demand:

In the event that funding is not available to fully operate work-based learning programs at the maximum allowable level, the ARWDB Director is authorized to implement Priority of Service measures to ensure continued operations of business services programs. These measures include the below items, in priority order; however, the Director may select the appropriate combination of measures to ensure the most effective operation of employer focused services.

- 1) Limit the work-based learning programs to our seven-county service area
  - In the past, business customers outside of our area were served if requested by another workforce board in the metro Atlanta region, due to funding shortages or other reasons. These requests have lessened over the last year, as the other Workforce Boards have resolved regulatory or staffing issues; but we are still occasionally requested to serve a business outside of our service area.
- 2) Limit the contracts or reimbursements to a combined total of not more than \$100,000. annually for companies using more than one program
- 3) Limit IWT Contracts to not more than \$50,000 rather than the \$100,000 allowed in current policy
  - Another approach would be to maximize the cost reimbursement to not more than 50% of eligible costs. Federal regs and local policy allow a reimbursement of up to 90% for companies with less than 50 employees; and up to 75% for companies employing between 50 and 100 people. Companies with more than 100 employees are limited to not more than a 50% reimbursement.
  - Although some local workforce boards choose to cap the reimbursement to 50%, regardless of company size, this approach is not recommended as it would have a greater impact on smaller businesses. Many of our past IWT projects have helped small and medium sized businesses to implement needed training. However, a large multinational company would not feel the impact as much. In addition, a specific dollar contract amount could be better monitored.
- 4) Decrease the training period and dollar cap of the OJT component of the RA to the same as the regular OJT program
  - Current policy allows up to one year and \$24,000 for Apprentices, which is double the amount for the regular OJT program
- 5) Limit new OJT contracts to not more than \$80,000; which would allow for the placement of 6 people at the current maximum of \$12,000 per participant; rather than up to ten at \$12,000 each
- 6) Restrict participation in work-based learning programs to targeted industries only
  - This is seen as an extreme but unlikely step. It would only be recommended in the case of a severe budget shortfall because many of our business customers do not fit into one of the targeted industries

It is recommended that the above priorities be implemented incrementally as needed to limit any negative impacts. It is noted that current contract language allows for termination ‘...in the event funds for carrying out the functions to which this contract relates are suspended or terminated in whole or in part ...’. However, we would still be obligated to pay for all previously incurred costs. Similarly, the contract notes that “all payments are contingent upon availability of funding”. Implementing these clauses would only be necessary in extreme circumstances, but they would carry a negative perception in the business community. It would be better to limit the funding per contract in advance following the above or similar guidelines.

Finally, it is noted that it may not be necessary to implement the above priority at all; depending on demand, program usage and the potential to receive reprogrammed dollars from the State. The policy is being recommended in the event budget shortfalls appear likely in the program year. Dollar expenditures are monitored monthly, and if policy implementation is deemed necessary, it would be reported at a regularly scheduled Board meeting.



## **ARWDB POLICIES AND PROCEDURES**

### **Priority of Service for Work-based Learning Contracts**

August 16, 2019

The Atlanta Regional Workforce Development Board (ARWDB) has developed a policy on the Priority of Service for work-based learning contracts in the in the event that funding is not available to fully operate the programs at the maximum allowable level, which is typically One Hundred Thousand Dollars per Company per year.

The ARWDB Director is authorized to implement the following Priority of Service measures to ensure continued operations of business services programs:

- 1) Limit the work-based learning programs to the ARWDB seven-county service area.
- 2) Limit the contract and reimbursements to a combined total of not more than \$100,000. annually for companies using more than one program.
- 3) Limit IWT Contracts to not more than \$50,000 rather than the \$100,000 allowed in current policy.
- 4) Decrease the training period and dollar cap of the OJT component of the Registered Apprenticeships program from one year and \$24,000 down to six months and \$12,000 (the same as the regular OJT program).
- 5) Limit new OJT contracts to not more than \$80,000; which would allow for the placement of 6 people at the current maximum of \$12,000 per participant; rather than up to ten at \$12,000 each.
- 6) Restrict participation in work-based learning programs to targeted industries only.

The Director may select the appropriate combination of measures to ensure the most effective operation of employer focused services. The above measures will be implemented only if budget shortfalls appear likely in the program year. Any steps implemented would be reported at the next regularly scheduled Board meeting.

Approval of the above is recommended.

**DATE:** August 1, 2019

**TO:** Atlanta Regional Workforce Development Board

**FROM:** Rob LeBeau, Director - ARWDB

**SUBJECT: PROPOSED ACTION – Approval of New Disability Employment Services Policy**

**Requested Action (What)**

To review and approve the new Disability Employment Services Policy.

**Reason (Why)**

The Workforce Innovation and Opportunity Act (WIOA) stresses increased physical and programmatic accessibility to support individuals with disabilities' access to workforce services. The Workforce Solutions Group hired a Disability Employment Specialist to coordinate these services between multiple agencies (Vocational Rehabilitation, ARWDB, Aging Services, the State Workforce Office, etc.) and to identify, train and place qualified individuals with disabilities in employment. The policy provides guidance to the Career Resource staff regarding the provision of services to individuals with disabilities through the workforce system.

**Timeframe (When)**

The policy will become effective immediately upon approval of the Board.

**Impact (Who and How Much)**

This policy provides direction and guidance to the staff providing employment services to individuals with disabilities in the Career Resource Centers (CRCs). The Disability Employment Specialist will help individuals with disabilities navigate through the system and will help staff better serve the individuals. The intent of this policy and the addition of the Disability Employment Specialist is to expand the capacity of American Job Centers (AJCs) and to improve employment outcomes of individuals with disabilities. The policy does not have a financial impact.

**Recommendation**

Approval of the new ARWDB Disability Employment Services Policy

## **ARWDB DISABILITY EMPLOYMENT SERVICES POLICY**

### **References:**

Americans with Disability Act of 1990 (ADA) (Public Law 101-336), WIOA (Public Law 113-128) Section 188, and 29 Code of Federal Regulations (CFR), Part 38

### **Purpose:**

To provide guidance to Career Resource Center (CRC) staff regarding the provision of services to individuals with disabilities through the workforce system.

### **Background:**

The Workforce Innovation and Opportunity Act (WIOA) stresses increased physical and programmatic accessibility to support individuals with disabilities' access to workforce services. WIOA requires that state agencies increase access to employment opportunities for individuals with disabilities. The law also requires that states and state agencies better prepare individuals with disabilities for competitive integrated employment.

The nondiscrimination and equal opportunity provisions found in Section 188 of WIOA and 29 CFR Part 38 prohibit discrimination based on race, color, religion, sex, national origin, age disability or political affiliation or belief, or, for beneficiaries, applications and participants only, based on citizenship status or participation in a WIOA Title I financially assisted program or activity.

### **Definitions:**

#### **A. Disability:**

As defined by the Americans with Disabilities Act, the term "disability" means that an individual has:

- a. a physical or mental impairment that substantially limits one or more major life activities
- b. a record of such an impairment
- c. being regarded as having such an impairment

#### **B. Assistive Technology (AT):**

A product, device, or equipment modified or customized that is used to maintain, increase, or improve the functional capabilities of individuals with disabilities.

Assistive technology may help an individual with a disability to perform activities related to life, work, or education independently.

Assistive technology can be anything from an assistive listening device, to a hand-held magnifier, to speech recognition software that allows an individual to use a computer with his or her voice. Assistive technology is often used to help ~~to~~ ensure effective communication with individuals with disabilities. Assistive technology is also used to help individuals with disabilities perform activities related to training, school, or work independently.

**C. Disability Employment Specialist:**

Responsible for improving the employment outcomes of individuals with disabilities, including those with significant disabilities, who are unemployed, underemployed, or receiving Social Security disability benefits, by refining and expanding services available through the American Job Centers (AJCs)/One-Stop system.

**D. Employment Network (EN):**

An entity that enters into an agreement with the Social Security Administration (Social Security) to either provide or coordinate the delivery of services to Social Security disability beneficiaries. The EN can be an individual, a partnership/alliance (public or private) or a consortium of organizations collaborating to combine resources to serve eligible individuals. ENs participating in the Ticket to Work program (Ticket program) must adhere to certain rules and regulations.

**E. Reasonable Accommodations:**

Any change to a job, the work environment, or the way things are usually done that allows an individual with a disability to apply for a job, perform job functions, or enjoy equal access to benefits available to other individuals in the workplace. Agencies are required by law to provide reasonable accommodation to qualified individuals with disabilities, unless doing so would impose an undue hardship to the agencies.

**F. Social Security Disability Insurance (SSDI):**

A program that enables workers who are employed in covered employment and have a medical condition that meets Social Security's definition of disability to collect benefits while they are unable to work.

**G. Supplemental Security Income (SSI)**

A cash assistance payment made to aged, blind and disabled individuals who have limited income and resources. SSI is funded from general tax revenues and managed by Social Security Administration.

**H. Ticket to Work:**

A work incentive offered by Social Security Administration which provides a “Ticket” to individuals age 18-64 who receive Social Security Disability or SSI. A Ticket holder can assign their ticket to an approved Employment Network or state vocational rehabilitation agency.

#### **I. Vocational Rehabilitation (VR):**

A state agency that provides a combination of services that are individually planned to enable an individual with a disability to prepare for, secure, retain, advance in, or regain employment that is consistent with the individual’s strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

#### **Policy:**

- A. The local One-Stop system and services must be accessible to all individuals, including qualified individuals with disabilities. Qualified individuals with disabilities must be given a meaningful opportunity to participate in and benefit from services necessary to meet their employment goals, including basic and individualized career services, follow up services, support services, and training provided by the local One-Stop system.
- B. No qualified individual with a disability may be excluded from participation in or be denied the benefits of One-Stop services, programs or activities, or be subjected to discrimination by any required partner because facilities are inaccessible or unusable by individuals with disabilities. Facilities must comply with the applicable federal accessible design standards, such as the ADA Standards for Accessible Design (1991 or 2010) or the Uniform Federal Accessibility Standards and accessibility obligations under Section 504 of the Rehabilitation Act and the implementing regulations at 29 CFR Part 32 must be met.
- C. Program accessibility requires the provision of reasonable accommodations for individuals with disabilities, making reasonable modifications to policies, practices, and procedures, administering programs and services in the most integrated setting appropriate, and providing appropriate auxiliary aids or services, including assistive technology devices and services where necessary to afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits of the program or activity. In determining what types of auxiliary aids and services are necessary primary consideration must be given to the requests of individuals with disabilities.
- D. In order to be effective, auxiliary aids and services must be provided in accessible formats, in a timely manner, and in such a way as to protect the privacy and independence of the individual with a disability. Some examples include: qualified interpreters, video remote interpreting service, text and video-based telecommunications products and systems, videotext displays, and telephone handset amplifiers.

- E. All One-Stop partners are expected to make a reasonable effort to bring qualified individuals with disabilities into the One-Stop system. The One-Stop system should be known for its ability to serve all customers including those with disabilities; therefore, all staff should be knowledgeable about how to provide reasonable accommodations and willing to do so in a positive, culturally appropriate manner.

**Procedure:**

- A. CRC staff with questions regarding the provision of reasonable accommodation should contact the Disability Employment Specialist.
- B. CRC staff should work with the Disability Employment Specialist when there is need to spend resources to provide accommodations.
- C. Decisions regarding whether an accommodation results in an undue hardship must be documented, including the reason for the request for the accommodation, the reason the accommodation would provide an undue hardship, and the ultimate resolution of the issue.
- D. Customers who believe they have been subjected to discrimination should follow the complaint procedure outlined in ARWDB Grievance Policy.

DATE: August 8, 2019

TO: Atlanta Regional Workforce Development Board

FROM: Rob LeBeau, Director - ARWDB

**SUBJECT: PROPOSED ACTION – Approval of the NextGen Program Work Experience Policy (NGPP 05-01)**

**Requested Action (What)**

To approve the new Work Experience Policy (NGPP 05-01).

**Reason (Why)**

Federal and State policies and procedures recommends that each local workforce development area (LWDA) develops a Work Experience Policy that would establish a process for operating and providing work experience (WEx) services and activities to youth participants. This is a new policy that will guide the NextGen Service Providers' (NGSP) WEx program designs, assessment tools to determine appropriate WEx worksite placements, types of WEx being offered, WEx funding allocation provisions, worksite requirements and expectations, supportive service offered while participating in WEx, as well as other guidelines to ensure a meaningful WEx for the participants, employers and NGSPs.

**Timeframe (When)**

Upon approval by the ARWDB, the policy would become effective immediately for distribution to and use by the NextGen Program staff and Service Providers.

**Impact (Who and How Much)**

The policy outlines the criteria, provisions, and expectations in operating an effective and efficient WEx program. WIOA requires that 20% of Youth Program funding be allocated to provide and perform WEx related activities and services. Through this requirement, the policy financial impact is based on "County Fair Share" allocation practices. WEx funding allocations are based on the fair share percentage for each respective county in the ARWDB service area. As a result, the funding amount allocated to provide WEx services varies among NGSPs. Allowable WEx funding expenditures are participant wages and stipends, salary for staff working directly with WEX and other allowable expenditures as outlined in the Training and Employment Guidance Letter (TEGL) 8-15 and 21-16 from the United States Department of Labor (USDOL).

**Recommendation**

This action comes as a recommendation from the NextGen Committee (NGC).





## NextGen Program

Connecting Talent with Opportunity  
A proud partner of the AmericanJobCenter network

# WORK EXPERIENCE (WEx) NextGen Program Policy: NGPP 05-01 ARWDB Approved: \_\_\_\_\_

**DATE:** August 6, 2019 (*Original*)  
**TO:** ARC/ARWDB Staff & NextGen Service Providers  
**FROM:** Marsharee O'Connor, NextGen Program Director  
**SUBJECT:** **Guidance & Guidelines for Operating and Providing Work Experience Services/Activities**

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| 3. Policy  | 13. Compensation                                    |
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| 9. Worksite Agreement                            | 19. Definitions                                     |
| 10. Trainee Work Experience Agreement            | 20. Attachments                                     |
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## 2 – POLICY

To establish a policy providing guidance and guidelines in the provision of Title 1-B, WIOA sec. 129(c)(2)(C) activities; Work Experience, 20 CFR § 681.540, § 681.550, and § 681.600. WIOA 129(c)(4) and 20 CFR § 681.590(a) requires that a minimum of 20 percent (20%) of local workforce area funds for Title IB Youth Program must be spent on WEx activities. The policy serves to establish a process for operating WEx and providing WEx opportunities to participants receiving WIOA services.

### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*

### 3 – POLICY

WEx is designed to provide exposure to the world of work for WIOA enrolled participants. 20 CFR § 681.600 requires that WEx must include an academic and occupational education component which:

- Is the contextual learning that accompanies a WEx;
- The academic may occur concurrently or sequentially with the occupational component;
- May occur inside or outside the worksite;
- Includes information needed to understand and work in specific industries or occupations; and
- Can be provided by the employer or may be provided separately in the classroom.

This integrated education and training model ensures the participants are provided workforce preparation activities, basic academic skills, and hands-on occupational skills training that are taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway.

### 4 – PROVISIONS

WEx must be a planned and structured learning experience that takes place in a workplace for a limited period of time with an academic and occupational education component. Participants must be provided with opportunities for career exploration, skill development, work ethics reinforcement, and workforce preparation activities to aid the participant in gaining marketable skills that lead to unsubsidized employment or entry into a registered apprenticeship program. WEx may take place in a private, public or non-profit sector. WEx is not intended to exclusively benefit the employer, participants placed in WEx are considered Trainees and employers should not depend on the Trainee's productivity to maintain or advance the employers' profits or performances.

**WEx may be paid or unpaid** and are beneficial for those participants who have sporadic employment history or limited marketable skills and are looking to upgrade their skills. WEx provide the participant with an opportunity for work acculturation and basic occupational skills attainment.

**WEx after WIOA Exit** – Subsidized WEx is not available for participants who have exited (in Follow-up services) the NextGen Program.

#### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*

## 5 – WORK EXPERIENCE DESIGN

NGSP must have a WEx program design that specifies the operational processes and tools required to effectively and efficiently operate WEP (including but not limited to program goals, length of WEx, assessment of participant's interest and aptitude, participant wage, monitoring of worksites and participants, etc.).

### Length of WEx

The length of WEx must be limited to the length of time appropriate for career exploration and for developing good work habits. As a result, WEx placement should be no more than sixteen (16) weeks. However, depending on the complexity of the job tasks and the individual needs of the participants, there may be circumstances where WEx can be extended. An NGSP must receive prior approval from ARC prior to extending a participant's WEx beyond sixteen weeks.

- ❖ WEP activities should conclude by the end of each program year.

## 6 – ASSESSMENTS PRIOR TO WORK EXPERIENCE PLACEMENT

WEx must be appropriate based on the needs identified by an objective and comprehensive assessment as documented in the participant's Service Plan (ISS/ISP/IEP). WEx opportunities may be offered to participants after an assessment of the participants skills, interests, aptitudes, prior WEx, education, employability and career objectives have been conducted and it is determined that the participant will benefit from participating in WEx. Once deemed appropriate for WEx, the WEx must be included in the participant's Service Plan.

## 7 – TYPES OF WORK EXPERIENCE ACTIVITIES

The types of paid and unpaid WEx activities available for participants include the following:

1. **Summer Employment and other employment opportunities available throughout the school year** – Summer employment placements that typically occurs after the last day of school for summer break and ends before school resumes for the following semester as well as year-round employment opportunities throughout the school year.
2. **Pre-apprenticeship Programs** – A preparatory program that prepares participants who want to begin an apprenticeship for a certain industry and trade. It is *“designed to prepare individuals to enter and succeed in Registered Apprenticeship programs. These programs have a documented partnership with at least one Registered Apprenticeship program sponsor and together, they expand the participant's career pathway opportunities with industry-based training coupled with classroom instruction.”* The pre-apprenticeship must be sponsored by one of the Registered Apprenticeship programs indicated on the Eligible Training Provider List (ETPL).

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### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*

3. **Internships and Job-Shadowing** – These two activities take place in a workplace and both offer the participants exposure to employers and their working environments. They must be supervised, emphasize learning and professional development, and include an evaluative component for both the employer and the participant. Program differences are distinguished below:
  - A. Internship – A planned and structural learning experience that can be paid or unpaid, the activity **can last from one week up to sixteen (16) weeks** and must offer career related learning opportunities and experiences. It cannot be routine or repetitive tasks unrelated to identified learning goals.
  - B. Job-Shadowing – Enables the participant to walk through the work day as a shadow (spend some time observing) to a competent worker to witness firsthand (learn) about the occupation, to understand the work environment and the skills needed for the occupation and potential career options. This **can last from one day up to one week**.
4. **On-the-Job Training (OJT)** – “Provides reimbursements to employers to help compensate for the costs associated with skills upgrade training and loss of production for newly hired employees. OJT can assist employers who are looking to expand their business and need additional staff trained with specialized skills. OJT employers may receive reimbursement of 50% or 75% of the wage rate of OJT trainees.” OJT benefits the employees (youth participants) by providing an opportunity to “earn while learn” in a hands-on environment, acquire job and career advancement skills, and provides an opportunity for long-term employment.
  - ❖ **All OJT opportunities must be approved and directed by ARC. OJT funds are reserved at ARC and are not allocated to an NGSP’s contracts.**
5. **Workforce Preparation** – The activities, programs or services designed to help a participant acquire a combination of basic academic, critical thinking, self- management and employability skills.

## 8 – WORKSITE ELIGIBILITY

In determining an employer’s viability to become a worksite, an NGSP must:

1. Authenticate the employer’s history with WEx contracts, history of layoffs, relocation and labor disputes, as well as occupational and industry outlook.
2. Conduct a worksite pre-assessment to verify that the requirement of 20 CFR 683.260 is met.

### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*

## 9 – WORKSITE AGREEMENT

NGSP must complete a Worksite Agreement with each worksite that is utilized. The signed copy of the Worksite Agreement must be given to all parties to ensure that the expectations are fully understood.

- At a minimum, the Worksite Agreement should include the following elements
  1. Names and contact information for all parties;
  2. The names and titles of the Worksite Supervisors who are authorized to sign the timesheet for the WEx participant(s);
  3. The participant's WEx start and end date;
  4. Responsibilities and expectations of the participant, the worksite, and the NGSP;
  5. The job title, pay, duties, and goals for each WEx participant;
  6. A statement informing the worksite that they may be subjected to worksite monitoring by Federal and State representatives, as well as regular visitations by NGSP staff to check on the progress of the WEx participants;
  7. Other information relevant to the specific WEx activity; and
  8. Signatures and dates for all applicable parties.

## 10 – TRAINEE WORK EXPERIENCE AGREEMENT

If the participant is not a party to the Worksite Agreement, there must be an executed agreement with the participant to define expectations.

- At a minimum, the Trainee Work Experience Agreement must address the following elements:
  1. Worksite, address, supervisor, and telephone number;
  2. Start and end date;
  3. Responsibilities and expectations of the participant, the worksite employer, and the NGSP;
  4. Job title, wage, duties, and goals; and
  5. Participant signature and date.
    - ❖ If the participant is under 18, the agreement must contain the signature of the participant's parent or legal guardian.

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### REFERENCES:

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*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*

The scheduled number of hours per week may be modified by the worksite after work begins pending the written approval of the participant and the NGSP.

## 11 – WORK EXPERIENCE EXPENDITURE PROVISION

A minimum of sixty percent (60%) of the WEx funding must be allocated to participants' wages and a maximum of forty percent (40%) to staff who are directly working with WEP, as well as other related WEx costs. NGSP may elect to allocate more than 60% funding toward participant wages.

- The same WEx funding allocation requirements of 60/40% applies to all "Employer of Record" partnerships.
- NOTE: The 60/40% requirements do not apply to OJT, as those opportunities are paid with funds reserved by ARC.
- No certificate training costs will be allocated to the WEx budget.

Allowable expenditures may include items such as:

- Wages or stipends paid for participation in a WEx;
- Staff time working to identify and develop a WEx opportunity, including staff time spent working with employers to identify and develop WEx;
- Staff time working with employers to ensure a successful WEx, including staff time spent managing WEx;
- Staff time spent evaluating WEx;
- Participant WEx orientation sessions;
- Employer worksite orientation sessions;
- Classroom training or the required academic education component directly related to WEx;
- Incentive payments directly tied to the completion of WEx; and
- Employability skills or job readiness training to prepare youth for a WEx.

WEx participants are not authorized to work overtime and shall not be compensated for overtime wages, sick leave, vacations, lunch breaks, or holidays recognized by the NGSP or employer as a "paid holiday".

When determining the types of expenditures that are allowable to help meet this requirement, additional information can be found in TEGL 8-15 and TEGL 21-16.

Page 6 of 12

### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*

## 12 – EMPLOYER OF RECORD

In order to provide paid WEx opportunities, NGSP must have the capacity to be an Employer of Record, whether directly provided or through partnership with an agency or an employer who will serve as the Employer of Record. The Employer of Record must adhere to all child labor laws regarding hours of employment, working conditions, etc. as required by Federal and State labor standards. The Employer of Record must have FICA taxes and Workers Compensation insurance. Worker compensation must be provided prior to and during WEx worksite placements.

- NGSP must have reasonable insurance coverage for any other work-based learning activities that requires the participant to be at a worksite (but is not working).

## 13 – COMPENSATION

Per Uniform Guidance 2 CFR Part 200, participants must be provided with a reasonable wage or stipend consistent with that paid for similar work.

### Wages

Participants must be compensated according to Georgia minimum wage standards or as otherwise stated according to law, statutes and regulations, or are paid the prevailing wage of employees with similar training, experience, and skills for a similar occupation, as set by the employer. However, since WEx is intended as a trainee position, wages do not typically exceed those for entry level employees.

### Stipend

A stipend is an allowable payment for participation in unpaid WEx or classroom activities, including work readiness or employability skills training. Stipend is a one-time payment that must not exceed \$250.00 per qualifying WEx activity. Stipend must be issued through a uniformed payment system (fixed payments) to a participant for the classroom-based learning (career awareness and exploration) and job shadowing activities. Successful completion of the activity must be documented as the basis of stipend payment. The activity should be of limited duration and be tied to specific learning goals. NGSP must describe on the Service Plan the activity and the goal to be achieved that will result in a stipend being paid.

- NGSP must develop a job shadowing and classroom-based stipend policy to guide how stipends may be paid for WEx activities. The policy and procedure for stipend payment must align with Uniform Guidance, 2 CFR Part 200.
- Wages and stipends must be issued in the form of a check or direct deposit. NO cash payments.

### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*



## 14 – SUPPORTIVE SERVICES & INCENTIVES

### Supportive Services

Supportive services based on specific need as determined and deemed appropriate by NGSP may be provided to participants engaged in WEx activities. See NGP “**Supportive Services Policy (NGPP 03-03)**”.

### Incentives

Incentive may be rewarded to participants upon successful completion of activities tied to identified WEx goals in the participant’s Service Plan. See NGP “**Incentive Policy (NGPP 04-01)**”

## 15 – WIOA WORKPLACE GUIDELINES

All employment State Statutes and Federal Administrative Codes concerning youth 14-17 engaged in WEx shall be followed. NGP reserves the right to monitor the employment and training activities of youth for compliance with all applicable provisions, Administrative Codes and requirements relating to the employment of children/minor.

### Labor Law Standards

All labor standards where an employee/employer relationship exists, as defined by the Fair Labor Standards Act (FLSA) or applicable State law must be followed. TEGL 14-08 states that wage requirements under the FLSA apply to all participants employed under WIOA. Therefore, the provisions of FLSA apply to all participants engaged in a paid WEx, as do Federal and State minimum wage laws.

### Non-Discrimination and Equal Opportunity

WIOA Section 188 (a)(2) prohibits discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief. WEx services must be provided to all participants provided the activities align with the participant’s Service Plan.

### Georgia State Workers’ Compensation/Health and Safety Standards

WIOA §667.274 of the Federal Register 29 CFR Part 652 et al provides:

- “(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 programs and activities under Title I of WIOA. (b)(1) To the extent that a State Workers Compensation Law applies, workers’ compensation must be provided to the participants in program 7 and activities under Title I of WIA on

#### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*



the same basis as the compensation is provided to other individuals in the State in a similar employment.”

- “(2) If a State Workers Compensation Law applies to a participant in work experience, workers’ compensation benefits must be available for injuries suffered by the participant in such work experience. If a State Workers Compensation Law does not apply to a participant in work experience, insurance coverage must be secured for injuries suffered by the participant in the course of such work experience.”

## **Sectarian Placements**

Under WIOA Section 188 (a)(3), WEx participants shall not be employed to carry out the construction, operation, or maintenance of any part of any facility that is used or to be used for sectarian instruction or as a place for religious worship (except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants).

## **16 – UNALLOWABLE PLACEMENTS**

### **Displacement of Employees**

20 CFR § 680.840 emphasizes that WEx funds may not be used directly or indirectly to support the following:

- A. Participants engaged in WEx cannot displace current employees.
- B. Participants should not be placed in a WEx when:
  - A regular employee is on layoff from the same or any substantially equivalent job; or 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 with a WEx participant; or the job is created in a chain of command that infringes in any way on the promotional opportunities of currently employed workers; and/or
  - The placement results in a partial displacement, such as a reduction in the hours of non- overtime work, wages, or employment benefits, of any current employee (as of the date of the WEx participation); and/or
  - The placement impairs existing contracts for services or collective bargaining agreements; or “filling of a job opening that is vacant because the former occupant is on strike, or is being locked out in the course of labor dispute, or the

#### **REFERENCES:**

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

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*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*

filling od which us otherwise an issue in a labor dispute involving a work stoppage”.

### **Non-allowable WEx Worksites**

WEx placements cannot involve work in a casino or other gambling establishment, aquarium, zoo, golf course, swimming pool, and other occupations that may be prohibited for youth.

## **17 – DOCUMENTATION OF ELIGIBILITY & SERVICE DELIVERY**

WEx services data and document requirements for the WorkSource Portal/VOS are:

1. Documents to be uploaded – All documents indicated under “20 – ATTACHMENTS” section of this Policy, State & Federal tax forms (Form G-4 and Form W-4), and employment eligibility verification (Form I-9 and E-Verify).
2. Service Plan – Include goal(s) and objective(s) as indicated under “6 – ASSESSMENTS PRIOR TO WORK EXPERIENCE PLACEMENT” section of this Policy.
3. Case-notes – Document progress, challenges, successes and other relevant information related to the WEx.
4. Service Activity Code – The appropriate WEx service activity code must be assigned:
  - a) 400 – Youth Summer Employment
  - b) 408 – Internship Un-Paid
  - c) 409 – Youth-Job Shadowing
  - d) 419 Support Service – Stipends
  - e) 422 – Pre-Apprenticeship Training (Work Experience)
  - f) 423 – Pre-Apprenticeship Training (Classroom Training)
  - g) 425 – Work Experience – Paid
  - h) 426 – Work Experience – Un-Paid
  - i) 427 – Youth Internship – Paid
  - j) 428 – Youth On-the-Job Training

## **18 – MONITORING**

NGSP must conduct monitoring and review of its WEx funds, program, services (to include WEx worksites,) on a regular basis. NGSP must have a process in place to demonstrate that monitoring is being conducted. ARC staff will also conduct monitoring of the NGSP’s WEP, services and activities. Monitoring will include, but is not limited to:

- In person or desk review of files to include Worksite Agreement, timesheets, performance, etc.;

Page 10 of 12

### **REFERENCES:**

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*

- Worksites visits;
- Worksites, participants, and NGSP interviews; and
- Expenditures and invoices.

## 19 – DEFINITIONS

- |  |   |
|--|---|
| ▪ <b>ARC</b> – Atlanta Regional Commission                         | Individual Service Plan/ Individual Employment Plan                       |
| ▪ <b>ARWDB</b> – Atlanta Regional Workforce Development Board      | ▪ <b>TEGL</b> – Training and Employment Guidance Letter                   |
| ▪ <b>CFR</b> - Code of Federal Regulations                         | ▪ <b>WEP</b> – Work Experience Program                                    |
| ▪ <b>ITA</b> – Individual Training Account                         | ▪ <b>WEx</b> – Work Experience  |
| ▪ <b>NGP</b> – NextGen Program                                     | ▪ <b>WIG PS</b> – Workforce Implementation Guidance Programmatic Services |
| ▪ <b>NGPP</b> – NextGen Program Policy                             | ▪ <b>WIOA</b> – Workforce Innovation and Opportunity Act                  |
| ▪ <b>NGSP</b> – NextGen Service Provider                           | ▪ <b>WorkSource Portal/VOS</b> – / Virtual OneStop System                 |
| ▪ <b>OJT</b> – On-the-Job Training                                 |   |
| ▪ <b>Sec./ §</b> – Section   |   |
| ▪ <b>Service Plan (ISS/ISP/IEP)</b> – Individual Service Strategy/ |   |

## 20 – ATTACHMENTS

The following documents are included as attachments to the Policy:

1. Worksite Agreement
2. Trainee Work Experience Agreement
3. Trainee Work Evaluation
4. Timesheet & Trainee Progress Evaluation

## 21 – INQUIRES

Inquiries regarding this policy and its guidance should be directed to an ARC NextGen Program staff.

### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

*Uniform Guidance – 2 CFR Part 200*

*TEGL No. – 8-15; 23-14; and 21-16*

*NGPP – Incentive Policy 04-01 and Supportive Services Policy 03-03*

## 22 – POLICY EFFECTIVE DATE

This policy shall be effective upon the ARWDB approval date indicated on the first page of this document, and will remain in effect until further notice.

### REFERENCES:

*State Workforce (TCSG) – Policies and Procedures Manual (05/17/2019)*

*WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)*

*Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270*

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ResCare Workforce Services

# **Monthly Briefing Report**

## **One Stop Operator**

Reporting Period: July 2019

# ResCare Monthly Briefing Report

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## Focus Areas:

- Prior 30 Day Update
- Performance Metrics and Action Plans
- Next 30 Day Focus
- Innovation

## Prior 30 Day Update

Over the past 30 days, our team has been working on the following:

### 1) Quality Assurance (Ongoing)

- The Customer experience survey holding steady at 95.87%

### 2) Partner Integration

The One Stop hosted numerous hiring events in June and July. ***Achele Home Services and Amazing Southern Girl Home Care*** (C NA's and Office Admin.) ***The Reserve Network and Teamworx*** continue to hire strong for Warehouse positions. New Partnerships with ***Farmers Insurance*** (Protégé Program), ***SMB cleaning services***, ***OneSource Learning*** (seeking to fill 30+ positions), ***Home2 Suites by Hilton, Thred Up***, and ***Carter's***.



**New workshops for Participants!:** Employment applications, Mock interviewing, Social Media and Personal Branding, and Building a LinkedIn Profile.

**Clayton Career Resource Center** hosted a hiring event with First Touch Logistics/Amazon on June 19<sup>th</sup> in which 174 applicants attended the event! The Clayton CRC also hosted an event with Marta on July 10, and 14 job seekers attended.

# ResCare Monthly Briefing Report

## Performance Metrics and Action Plans

### Contractual

Project: GA ATLANTA WIOA ONE STOP Project Director: Carlethia Collier

Benchmarks	Target/ Eff Target	Category/ Freq	Contr ID	Jul19 ←	Aug19 -----	Sep19 -----	Oct19 -----	Nov19 -----	Dec19 ---Tar	Jan20 get---	Feb20 -----	Mar20 -----	Apr20 -----	May20 -----	Jun20 ----- >
Customer Satisfaction Rating	92% 92.00%	Quarterly	30452	95.87% 92.00%	*	*	*	*	*	*	*	*	*	*	*
RAYS Training Completion	98% 98.00%	Quarterly	30452	100.00% 98.00%	*	*	*	*	*	*	*	*	*	*	*
Partner Integration	3 3.00	Monthly	30452	3.00 3.00	*	*	*	*	*	*	*	*	*	*	*
Business Services	2 2.00	Monthly	30452	9.00 2.00	*	*	*	*	*	*	*	*	*	*	*

### Metrics

- Actions to sustain and metrics are listed below:

Action Step	Primary Owner	Completion Date	Effect	Status	Comments
<b>I. Customer Experience (Satisfaction) Rating</b>					
1 Review results of the survey daily and make contact with participants to ensure above average customer experience.	One Stop Operator- Carlethia Collier	Ongoing		Continuous	Meeting expectations. Send results to staff monthly so that they can see their progress and make improvements.
2 Ensure that resources are available, as well as wrap around services, to participants as soon as they enter the One Stop. (Shelters, Food Banks)	One Stop Operator- Carlethia Collier	Ongoing	95% for July 2019	Continuous	Meeting expectations--
<b>II. Rays Certification</b>					
1 All Staff Certified in RAYS (Rescare At Your Service)	One Stop Operator- Carlethia Collier		Ensures that staff has knowledge of all the tools required to ensure that job seekers are getting optimal service when they enter the One Stop.	Meeting 100%	Meeting Expectations
<b>III. Integration of Partners</b>					
1 Conduct Regular Partner Meetings to Share and improve resources (One per month)	One Stop Operator- Carlethia Collier	Ongoing	Allows partners to share information about resources and upcoming events	Conducted Monthly	Meeting Expectations-
2 Conduct/Host 2 additional partner events at the One Stop	One Stop Operator- Carlethia Collier	Ongoing	Increases knowledge about services provided at the One Stop and increase foot traffic to the One Stop.	Conducted Monthly	Meeting Expectations
<b>IV Business Services</b>					
1 Conducting at least 2 hiring events per month	One Stop Operator- Carlethia Collier	Ongoing	Ensures that job seekers are consistently put in front of available job openings and networking events	Conducted Monthly	Meeting Expectations

## ResCare Monthly Briefing Report

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### **Next 30 Day Focus**

Begin planning for a Logistics job fair the end of September.

### **Innovation**

Seeking to have a more streamlined sign in process (Electronic) for all of the career centers.



# Cherokee County Customer Activity

## Program Year 2019, Period of July 1, 2019 – July 31, 2019



<b>Cherokee Customer Visits</b>	<b>36</b>
<b>Computer Lab Visits</b>	<b>6</b>
<b>Workshop Attendance Job Smart, Resume, Other</b>	<b>1</b>
<b>Mobile Unit Visits</b>	
<b># Of Training Applications Rec'd</b>	<b>9</b>
<b># Of Eligible Applicants</b>	<b>7</b>
<b>Enrolled in VOS in PY 2019</b>	<b>0</b>
<b>Enrolled in Training in PY 2019</b>	<b>0</b>
<b>Active Customers</b>	<b>0</b>

# Clayton County Customer Activity

## Program Year 2019, Period of July 1, 2019 – July 31, 2019



<b>Clayton Customer Visits</b>	<b>843</b>
<b>Computer Lab Visits</b>	<b>794</b>
<b>Workshop Attendance Job Smart, Resume, Other</b>	<b>94</b>
<b>Mobile Unit Visits</b>	
<b># Of Training Applications Rec'd</b>	<b>73</b>
<b># Of Eligible Applicants</b>	<b>73</b>
<b>Enrolled in VOS in PY 2019</b>	<b>14</b>
<b>Enrolled in Training in PY 2019</b>	<b>12</b>
<b>Active Customers</b>	<b>14</b>

# Douglas County Customer Activity

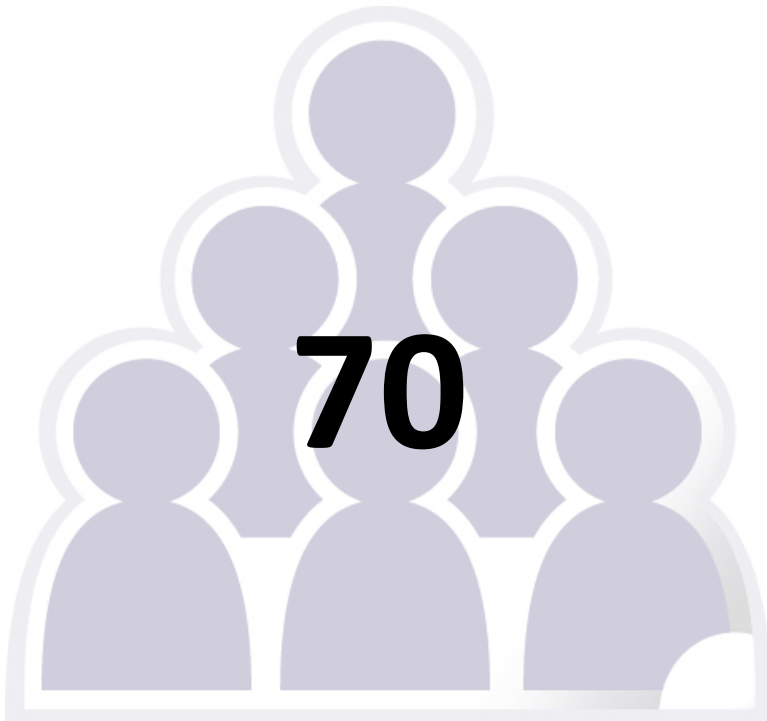
## Program Year 2019, Period of July 1, 2019 – July 31, 2019



Douglas Customer Visits	206
Computer Lab Visits	92
Workshop Attendance Job Smart, Resume, Other	10
Mobile Unit Visits	
# Of Training Applications Rec'd	21
# Of Eligible Applicants	5
Enrolled in VOS in PY 2019	5
Enrolled in Training in PY 2019	7
Active Customers	5

# Fayette County Customer Activity

## Program Year 2019, Period of July 1, 2019 – July 31, 2019



<b>Fayette Customer Visits</b>	<b>70</b>
<b>Computer Lab Visits</b>	<b>17</b>
<b>Workshop Attendance Job Smart, Resume, Other</b>	<b>3</b>
<b>Mobile Unit Visits</b>	
<b># Of Training Applications Rec'd</b>	<b>5</b>
<b># Of Eligible Applicants</b>	<b>5</b>
<b>Enrolled in VOS in PY 2019</b>	<b>1</b>
<b>Enrolled in Training in PY 2019</b>	<b>0</b>
<b>Active Customers</b>	<b>1</b>

# Gwinnett County Customer Activity

## Program Year 2019, Period of July 1, 2019 – July 31, 2019



Gwinnett Customer Visits	1,142
Computer Lab Visits	1,109
Workshop Attendance Job Smart, Resume, Other	67
Mobile Unit Visits	
# Of Training Applications Rec'd	148
# Of Eligible Applicants	80
Enrolled in VOS in PY 2019	7
Enrolled in Training in PY 2019	14
Active Customers	7

# Gwinnett Tech CRC Customer Activity

## Program Year 2019, Period of July 1, 2019 – July 31, 2019



<b>Gwinnett Tech Customer Visits</b>	<b>384</b>
<b>Workshop Attendance Job Smart, Resume, Other</b>	<b>41</b>
<b># Of Training Applications Rec'd</b>	<b>17</b>
<b># Of Eligible Applicants</b>	<b>16</b>
<b>Enrolled in VOS in PY 2019</b>	<b>45</b>
<b>Enrolled in Training in PY 2019</b>	<b>2</b>
<b>Active Customers</b>	<b>45</b>

# Henry County Customer Activity

## Program Year 2019, Period of July 1, 2019 – July 31, 2019



Henry Customer Visits	146
Computer Lab Visits	5
Workshop Attendance Job Smart, Resume, Other	13
Mobile Unit Visits	
# Of Training Applications Rec'd	21
# Of Eligible Applicants	7
Enrolled in VOS in PY 2019	10
Enrolled in Training in PY 2019	4
Active Customers	10

# Rockdale County Customer Activity

## Program Year 2019, Period of July 1, 2019 – July 31, 2019



Rockdale Customer Visits	242
Computer Lab Visits	6
Workshop Attendance Job Smart, Resume, Other	14
Mobile Unit Visits	
# Of Training Applications Rec'd	31
# Of Eligible Applicants	31
Enrolled in VOS in PY 2019	3
Enrolled in Training in PY 2019	5
Active Customers	3



# Breakout by County of PY 18 Customers Including Carry-Overs from Previous Program Year



<b>ARWDB AREA RESIDENTS</b>		<b>1,679</b>
Cherokee		<b>78</b>
Clayton		<b>360</b>
Douglas		<b>115</b>
Fayette		<b>40</b>
Gwinnett		<b>748</b>
Henry		<b>169</b>
Rockdale		<b>169</b>
<b>ATLANTA REGION RESIDENTS</b>		<b>108</b>
Cobb		<b>4</b>
DeKalb		<b>32</b>
Fulton		<b>72</b>
<b>OUTLYING AREA RESIDENTS</b>		<b>31</b>

# NextGen Program (Youth Services)

NextGen Service Providers	Active Participants
ARC	
Center for Pan Asian Community Service (CPACS) (Serves Gwinnett)	50
Cherokee Youth Works (Serves Cherokee)	54
Connecting Henry (Serves Henry)	92
Hearts to Nourish Hope (Serves Clayton & Gwinnett)	304
Paxen (Serves Clayton, Fayette and Rockdale)	195
Parents Educating Parents & Professional, Inc. (PEPP) (Serves Douglas)	74
ResCare (Serves Gwinnett)	85
Social Welfare Program Initiative (SWPI) - Clayton	7
Social Welfare Program Initiative (SWPI) - Gwinnett	5
The Bridge Academy (In-School Provider for 7 counties)	148
	1014