

Atlanta Regional

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# **ARWDB Policies & Procedures Manual 2017**

## **Section 1**

### **General Eligibility & Training Enrollment Procedures**

## **I. Eligibility Determination, VOS and Verification Procedures:**

Collection of information to determine eligibility for WIOA will begin at the point a customer begins the application for services process. When career and training services are provided, the appropriate customer information and services provided must be recorded in Geo Solutions Virtual One Stop (VOS) the statewide WIOA tracking system. Career Center Managers will be responsible for ensuring that customer data is input as services are provided by staff.

The following eligibility documentation must be obtained for individuals requesting career and training services: (See Eligibility Checklist)

**Citizenship/Authorization to Work:** Obtain a copy of a birth certificate, social security card, and/or Georgia Driver's License and/or other appropriate documents to complete Citizenship Affidavit. (Must document) Citizenship Affidavit Notarized.

**Social Security Number:** Obtain copy of Social Security Card, or other verification of the customer's numbers such as employer records and/or other government sources. (Must document)

**County of Residence:** Can be verified by Georgia Driver's License, Utility bill, tax records, addressed, stamped envelope

**Grievance Policy:** Signed and Dated.

**Selective Service Registration: (Males only)** Obtain verification from Selective Service via Internet or phone registration. In circumstances where individuals are not registered, but are younger than age 26, CRC staff should assist customers in registering with the post office or via the Internet. In circumstances where individuals are not registered and are age 26 or older and cannot register, CRC staff may request that ARC make an exemption for those individuals. Rationale for granting exceptions may include: customer was incarcerated and not able to register, customer is an immigrant and was not residing in the U.S. before turning age 26, customer is disabled, etc. (must document). The Atlanta Regional Workforce Development Board one stop operators/contractors have the responsibility for deciding registration compliance for the Selective Service System (SSS) and determining eligibility for services or benefits under WIOA Adult, Dislocated Worker and Youth Programs on a case-by-case basis. Exceptions may be approved on a case-by-case basis. See the Selective Service Procedures.

**Verification of Employment status and Income** Family/individual Income should be supported by customer documentation and/or information recorded in the UI wage file. If the UI wage file indicates no wages and/or wage information consistent with the income reported by the customer, no additional documentation will be required. In circumstances where the wage file indicates additional employers and/or significantly increased amounts of wages reported, more precise documentation of earnings is required. This may include written employer verification and/or written attempts to verify income.

**Verification of Dislocated Worker Status (Notice of no fault termination or Layoff):** Obtain documentation of layoff status (separation notice), no-fault termination letter or determination and verify UI status through the WIOA tracking system. (See eligibility checklist)

**Priority of service has to be determined in addition to eligibility.**

WIOA establishes a priority requirement with respect to funds allocated for Adult employment and training activities; this priority will be given to individuals who have met minimum eligibility requirements. Priority of service must be given to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient: those with reading, math, and language scores below 9<sup>th</sup> grade level and youth or adults unable to compute or solve problems, read, write or speak English at a level necessary to function on the job, in their family or in society.

Veterans and eligible spouses receive priority of service. Priority for WIOA Adult career services must be provided in the following order to specific groups:

- First, Veterans and eligible spouses who are also included in the groups given statutory priority for WIOA adult funds. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds.
- Second, Individuals who are not veterans or eligible spouses who are included in the groups given priority for WIOA formula funds. This includes public assistance recipients and low income individuals who meet income guidelines in the chart below and those determined basic skills deficient.
- Third, veterans and eligible spouses who are not included in WIOA priority groups.
- Last, to persons outside the groups given priority under WIOA.

Adult Low-Income Workforce Innovation and Opportunity Act (WIOA) Guidelines Effective Date: April 04, 2016		
Family Size	Annual Income	6 Month Eligibility Period Income (Must submit proof for 6 months prior to date of application)
One	\$12,375	\$6,188
Two	\$20,281	\$10,141
Three	\$27,850	\$13,925
Four	\$34,370	\$17,185
Five	\$40,561	\$20,281
Six	\$47,433	\$23,717
Additional family members	\$6,872 for each additional family member	\$3,436 for each additional family member

Adult Eligibility determination includes:

- An individual who is unemployed
- Individual Receiving Public Assistance - Supplemental Nutrition Assistance Program (SNAP) or
- Temporary Aid to Needy Families (TANF)
- Disabled individual whose personal income meets guidelines but whose family income does not
- An Individual who is Underemployed which includes:
  - a. Individuals employed less than full-time who are seeking full-time employment; OR
  - b. Individuals who are employed in a position not commensurate with the individual's demonstrated level of educational attainment and skills; OR

- c. Individuals who are employed, but whose current job's earnings are not sufficient compared to their previous job's earnings; OR
- d. Individuals who are working full time and meet the income guidelines in the chart above.

**ARWDB target groups** include Individuals that have one or more of the following characteristics that act as barriers to employment or other factors that may limit an individual's ability to seek and maintain employment. These include:

TANF	Lacks a high school diploma or GED
Unemployed, Underemployed or Discouraged Worker	Poor employability skills
Offender	Poor work history
Disabled	Poor basic skills
Older Worker	Limited English proficiency
Dislocated Workers who also meet low-income eligibility	Lacks self-sufficiency (working poor)

**Customers applying for training services with recent training or attainment of a recognized technical school certificate, college degree or diploma (one year or less) may not be considered for training services.** This is particularly relevant for customers with recent training or education in areas considered to be "in-demand". Career pathways in healthcare may be approved on a case by case basis. A case-by-case determination will be made in the marketability of a prior degree or certificate.

A two-year or less policy will apply to those individuals who have completed WIOA funded training. An individual who has had WIOA funded training but did not complete the training will not be considered for additional training. An individual who completed prior WIOA funded training but was exited without employment will be required to provide information to substantiate extenuating circumstances for lack of successful placement. A person who completed training but has failed to take credentialing exam (especially in the IT field); will be required to provide information to substantiate extenuating circumstances for lack of credential prior to reenrollment.

**Training assistance for individuals seeking four-year College and advanced degrees, college and advanced degree education will only be approved for funding in areas that are occupational specific, and are in current demand areas, and can be completed within the time limits by the ARWDB.** General liberal arts degrees will not be approved or funding. Some examples of approved degree programs include: teaching, accounting, nursing and medical related occupations. Please note that additional options are approved for persons considering training in the health care critical shortages occupations.

#### **Health Care Targeted Industry Training Priority:**

- Eligibility for training of currently employed workers may be waived of income eligibility for adult customers in entry level jobs where training opportunities exist for career paths within high-demand targeted industry sectors and/or clusters.
- An example might include training of currently employed patient care attendants where WIOA income eligibility is waived for employees advancing within the health care industry.

#### **Priority for Dislocated Worker training services.**

**First priority will be given to Veterans and/or eligible spouses (CFR Part 1010).** Additional priority will be given to individuals who have met minimum eligibility requirements, but have lost their employment or income from employment for one or more of the following circumstances:

- Has been laid off, or received a notice of layoff **and** is either eligible for or has exhausted entitlement to UI **or** has been employed for duration sufficient to

- demonstrate an attachment to the workforce (**6 months, as per UI consideration**), but is not eligible for UI due to insufficient earnings or having performed services for an employer not covered by UI
- Individuals who have been terminated from employment due to no fault of their own (**as determined by UI review**) and **are** eligible for UI
  - Previously self-employed and unemployed due to natural disaster or general economic conditions
  - Displaced homemaker (may include spouses of dislocated workers)
  - After layoff, have become reemployed in an income maintenance position and meets the definition of a currently employed dislocated worker
  - Individuals who have been separated for cause and/or those who voluntarily left who are also eligible for UI.
  - Currently employed dislocated workers (underemployed) (see below)
  - Displaced Homemakers (male or female)  
An individual who has been providing unpaid services to family members in the home and who has been dependent on the income of another family member but is no longer supported by that income and is  
Unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

Individuals who have quit their jobs or have been separated for cause, and not approved for UI, will not be considered for dislocated worker training services. Exceptions may be made when it is determined that an individual was “fired” for not possessing the skills necessary to perform on the job.

Currently employed dislocated workers may be determined eligible for services if the customer’s current employment meets all of the following conditions:

- The individual is currently making less than 85% of former wages, and/or is in employment that uses significantly less skills or abilities than the job of dislocation, and is not commensurate with the individuals demonstrated level of educational attainment; **and**
- The individual’s current employment and job of dislocation is not in a field or occupation that is generally known for short term or contract work. In these instances, customers may be assessed for program eligibility at the time they are no longer working.

**All dislocated workers must also be determined to be in need of additional training or services and unlikely to return to their previous occupation or industry without additional training. \***

In need of training will be the summary result of the assessment information, labor market analysis, and review of the desired training course to establish that the participant’s likelihood of securing and/or maintaining regular full-time employment will be significantly improved with additional skills obtained from training.

**\*Unlikely to Return to Previous Occupation/Industry and/or limited opportunities for re-employment in the area.** This decision is based on a review and assessment of an individual’s work history, skills, training and education. The final determination is the responsibility of the local workforce development professional based on knowledge of the local labor market and an assessment of the customer’s abilities

The list below is a sample and not intended to be all inclusive.

- Insufficient job openings exist in the customer’s occupation or industry within the customer’s commuting distance.
- Insufficient job openings on work shifts appropriate for the customer.
- Customer lacks personal transportation or access to public transportation and there are insufficient job openings within walking distance of the customer’s residence.

- The customer's occupation is listed as one of the areas or region's declining industries or occupations.
- The customer's occupation has changed such that the customer no longer has the skills needed for that occupation.
- The customer's industry or occupation has been subject to, or is expected to be subject to, repeated layoffs or frequent business closings.
- Recent major layoffs have occurred or been announced during that last twelve months within the customers' industry/occupation and commuting area that significantly reduce re-employment opportunities for the customer.
- The customer's age and/or medical condition is such that the customer can no longer perform his/her previous occupation.
- The customer lacks skills currently in demand in the local labor market.
- The customer lacks appropriate industry and/or national certification or accreditation for re-hire or re-employment in industry/occupation of lay-off.
- The customer is experiencing difficulty in obtain suitable comparable re-employment. Indicators may include: being unemployed for 13 or more weeks, completed an exhausted long-term job search with no appropriate job offers, etc.
- Customer lacks strong basic skills or English speaking/writing skills for employment.

### Steps to Apply for Training

1. Completion of WIOA Application
2. Completion of appropriate assessment for the institution and training. This may include one or more of the following:
  - A. Entrance and placement exams for technical colleges and institutions of higher learning.
  - B. Test of Adult Basic Education (Basic Skills Testing).
  - C. CareerScope (Comprehensive assessment of abilities, aptitudes and interests)
  - D. Georgia Career Information System (GCIS) and O\*Net Skills Search
  - E. Transferability of Skills Analysis based on customers' previous work history and education level.
  - F. Prove-It or other industry specific assessment
3. JobSmart Workshop
4. Completion of other requirements for training
  - A. Other industry/occupational specific related criteria such as physical requirements, background screening, drug testing, etc.
  - B. **Individual Employment Plan**  
An Individual Employment Plan (IEP) will be prepared for all Adult and Dislocated Worker participants; the IEP is a process developed by the participant and career advisor. Participant strengths, assessment results, identified barriers and the steps to address them, along with goals and timelines are recorded on the IEP Form and it is signed by both the participant and career advisor. As the barriers are addressed and benchmarks measuring progress toward goals are met, they are recorded in the Achievement Objectives portion of the IEP until the participant achieves the final attainment of employment.

The following three activities are incorporated into the IEP

1. **List of Twenty Jobs**  
Participants are asked to submit a list of 20 jobs for which they have applied over the previous three month period and for which they have not received a job offer.
2. **Labor Market Research Form**

Customers will complete the **Labor Market Research** form for the area they are interested in seeking employment after the completion of training. Customers should gather a minimum of 8 job leads that might be appropriate for them upon completion of their desired training program. Information from three of jobs that best suit the customer should be summarized and used as a broad guideline for jobs available after training. Customers may be denied training if they refuse to complete the labor market research activities. Customers may also be denied training if the results of their labor market research reveal few, little or no openings within the metropolitan Atlanta area. Job openings should be recent (posted within the last 90 days). Customers may also be denied training if they lack other pertinent general job requirements such as education and work experience. The ARWDB may provide training for a job where demand is limited, but an individual has a bona fide job offer contingent upon completion of training.

**3. Training Program Research Form**

Customers requesting training will be required to complete the Program Research to gather pertinent information concerning training opportunities. Customers should review the Georgia State Eligible Provider Listing (ETPL) for providers and review performance of each provider. In cases where few training providers serve a particular county, program research will be limited. Customers should also review the ARWDB Training Options Listing on the website.

**C. Resume Development**

Customers requesting career, support and training services will be required to provide staff with an initial resume prior to and/or during the application process before approval of and/or provision of advanced services. Resumes will be reviewed and determined acceptable by designated staff at the Career Resource Center prior to the provision of training.

Eligible adults, older youth and dislocated workers who have been determined eligible for WIOA and have completed the required services for consideration for training, may be considered if the following criteria are met.

1. The customer must meet all entry level criteria, apply to and be accepted into a training institution's
2. program of study. Generally, acceptance must be without conditions and require no remedial courses.

Applicants must be accepted into the specific occupational skills training program of their choice. For extremely competitive program acceptance such as nursing, radiology technology and dental hygienist, customers are encouraged to select a second choice. While the emphasis in career education is on specialized offerings, each degree/certificate program includes a selection of courses (prerequisites) from an approved core of general education; depending on the training program selection, these core courses (prerequisites) may be included in the customer's Individual Training Account funding.

**Example:**

A customer is interested in attending ABC technical school and becoming a registered nurse. She has no related college experience and needs to complete several pre-program classes before she can apply to the nursing program. During the pre-program courses, she is assigned to a "health sciences" major to order to receive HOPE and PELL assistance. During her enrollment into the "health sciences" program, she is not eligible for WIOA assistance. She may become eligible for WIOA assistance once she completes the "health sciences" and is accepted into the "nursing" program.



Extended critical shortage healthcare curricula will be reviewed and approved on a case-by-case basis. EXCEPTION: Registered Nurses seeking graduate degrees in Nursing to fill vacant instructor positions at universities and technical college's program limit has increased to four years. Example:

3. The customer must pass other occupational or industry related criteria which are conditions of securing training and employment. Examples may include: clean driving record for commercial truck driver training; background screening for felony conviction or patterns of arrest or conviction for positions with education, information technology, accounting, aviation or health care settings; drug screening.
4. The training institution and course of study must be listed on the Georgia Eligible Provider (ETPL) list. If the training requested is less than 120 hours and does not appear on the ETPL, documentation of 3 similar training programs, if available, is required for procurement purposes.
5. The participant must apply for HOPE and PELL grant assistance, or demonstrate that they would not qualify for assistance. A copy of the application or notification of financial aid must be presented or verified electronically. Individuals who have recently applied for assistance, but have not received an award of notice, may be approved to begin training with WIOA funds. They will be required to provide a copy of the award within 45 days of the beginning of training or before the start of the next registration period for continued training, or prior to the issuance of an additional voucher for training/training expenses.
6. The customer is a resident of the ARWDB county service area. If the customer is a dislocated worker, but resides outside of the service area, he/she may receive training if the dislocation employment was located within the ARWDB service area. The ARWDB service area includes Cherokee, Clayton, Douglas, Fayette, Henry, Gwinnett and Rockdale counties. Residents of other service areas will be referred to apply for training services with the other ARWDB offices.
7. Coordination with trade funding programs will also need to occur for dislocated workers eligible for benefits. In the event that Trade Programs have significant funds available for training, training may be funded 100% from Trade funds and customers may be offered career, case management, supportive services and job search assistance.

In the event of limited Trade funds, the ARWDB will equally share costs of training and related approved expenses. Career Advisor staff will develop a training plan for customers eligible for trade related programs that splits the costs 50-50 between WIOA and the trade related program up to the limits set by the ARWDB. In the event that 50% of the training costs exceed our limits, our limit will be applied and the remainder of training expenses will be charged to the specific trade program.

8. The customer can demonstrate that they can successfully participate in training. At a minimum, the training plan should address issues that affect the individual's ability to attend/complete training such as: availability to attend classes offered (time and/or location of training); need and likelihood of part-time or interim employment while attending training; other financial support mechanisms (how is the individual going to live while in training?) such as unemployment benefits, public assistance, severance pay, other family member employment income and support; and an indication that assessment results indicate a match between the individual's interests and aptitudes for the training area and training related occupation

Listed below is a brief description of ARWDB forms for eligibility and case management processes.



Form Name	Who Completes It	Purpose
WIOA VOS Registration	<ul style="list-style-type: none"> <li>➤ Customer initiates</li> <li>➤ Staff review</li> </ul>	<ul style="list-style-type: none"> <li>➤ Used to gauge customer interest in training and support</li> <li>➤ Initial service request by customer</li> <li>➤ Staff can use to direct customer to other funding sources and assist customer with career and training exploration</li> <li>➤ Used to gauge customer interest (measure of strong interest and training path)</li> <li>➤ May be used to document core career services</li> <li>➤ Established financial obligation of training and support dollars</li> </ul>
WIOA VOS Application	Staff completes upon registration for career or training services using application form completed by customer	<ul style="list-style-type: none"> <li>➤ Registers customer for services and records eligibility for WIOA</li> </ul>
WIOA Eligibility Checklist	Staff/Center Manager	<ul style="list-style-type: none"> <li>➤ Indicates eligibility</li> </ul>
Customer Resume	Must be submitted prior to training	<ul style="list-style-type: none"> <li>➤ Must be approved by staff</li> </ul>
Individual Employment Plan	<ul style="list-style-type: none"> <li>➤ Customer and Career Advisor Prepare</li> </ul>	<ul style="list-style-type: none"> <li>➤ Summarizes assessments, barriers, supportive service needs and training goals</li> </ul>
Program Research Form	<ul style="list-style-type: none"> <li>➤ Customer completes comparing 1-3 different or similar training programs</li> </ul>	<ul style="list-style-type: none"> <li>➤ Assist customer with making training and employment related decisions</li> </ul>
Labor Market Research	<ul style="list-style-type: none"> <li>➤ Customer completes with information gathered for 8-10 current job openings</li> </ul>	<ul style="list-style-type: none"> <li>➤ Assist customer with making employment related decisions</li> </ul>
List of Twenty Job Applications	<ul style="list-style-type: none"> <li>➤ Customer submits list of 20 jobs applied for over three months -not employed</li> </ul>	<ul style="list-style-type: none"> <li>➤ Used to verify need for skills training to become competitive employment candidate</li> </ul>
Customer Activity Checklist	Training Provider Staff complete and forward to Career Resource Center on a regular basis. CRC Staff forward to ARC after review.	<ul style="list-style-type: none"> <li>➤ Provides customer status updates as customers complete or leave training, pass tests, obtain credentials, etc.</li> </ul>

Form Name	Who Completes It	Purpose
Customer Employment/End of Service Checklist	Training Provider or CRC staff completes as customers obtain employment or are determined unable to locate or participate in employment activities. Copies are forwarded to ARC for approval. CRC Staff are responsible for verifying employment information on the form.	<ul style="list-style-type: none"> <li>➤ Provides employment and exit information for GWS reporting</li> <li>➤ Report customers to be exited who have not found employment or who have been unable to continue in services</li> </ul>

## Case Management and Customer Tracking

Once customers are registered for WIOA the following contact and case management must occur:

1. Contact must occur at a minimum on a monthly basis through exit.
2. If problems surface or become apparent during a customer contact or as a result of any other notification of a customer issue, contact must be increased to a minimum of a bi-weekly basis until the problem is resolved or the situation stabilized.
3. Contact with the customer is required during the first week (within 3 days is preferred) of a customer's scheduled begin date of training. Contact may occur via telephone or email.
4. Successful contact is likely to occur late in the day, during the evening or on the weekend.
5. Efforts to contact customers must be documented and in a format easily retrievable for program monitoring and/or available for access by other center/program staff. Some suggested topics for contact while customers are attending training might include:
  - < Is the training what you expected?
  - < How are you progressing?
  - < Is the training being delivered in a manner that you think is useful?
  - < Do you have all the supplies and materials you need?
  - < How are your family members and friends coping with your new schedule?
  - < Are you happy with your childcare arrangement?
  - < Is your car holding up?
  - < Is there anything I can help you with?
  - < Are your classes being offered as originally scheduled?
  - < Have you passed xyz course?
  - < Are you scheduled for xyz certification exam?
  - < Did you pass or when will you know the results?
  - < Do you need assistance with finding a job while you are in training?

As customers near the end of training, customer contact will need to focus on the completion of training and preparation for job search activities. Suggested topics as customers near this phase of services might include:

- < Have you identified job placement resources?
- < Have you updated your resume to include your new skills?
- < I want to critique your resume.
- < I would like a copy of your resume I can send to potential businesses.
- < I want to update my copy of your resume and assist you with customizing your job search efforts.
- < Are you working with the job placement staff from your training provider?
- < Have you received job referrals from the training provider?
- < Do you have copies of any certificates from training courses you completed and/or

- test/license certification ready for prospective employers? I would like to have a copy that I might be able to forward along with your resume to my business contacts.
- < Have you targeted businesses that employ individuals with your skills?
  - < The Career Resource Center has a variety of resource materials and tools available to assist you with your job search.
  - < The computer labs are available with internet access, resume writing tools, faxing and email to send your resume to prospective businesses.

As customers actively begin their job search, contact needs to increase to weekly for job search staff. Some topics might include:

- < Did you have any promising contacts or interviews this week?
- < Any plans or strategies for next week?
- < Are there any companies you would like to investigate that I can help you with?

Once employed:

- < How's the job going?
- < Have you made it to work on time each day?
- < How's the commute and family schedule?
- < How long or are you still on probation?
- < Is the job permanent or temporary? If temporary, how long is the assignment?
- < Are you seeing any opportunities for pay increases, overtime, or advancement?

All customers must have services provided at least once during every 90 day period. ARWDB requires on-going monthly contact for all participants enrolled in services. VOS should indicate regular on-going contact with the customer. All documentation will be uploaded to VOS. It is also important that training services be updated on a regular basis to reflect a customer's actual training history. With the use of the Customer Follow-Up Checklist by training providers along with the submission of attendance and/or certification results, increased communication should occur between training providers and one-stop staff.

**Collecting information concerning customer completion of training activities, credential information and initial employment data** needs to occur on a regular and on-going basis. Customer Activity and Follow-Up Checklist forms may be completed by training and/or Career Resource Center Staff. Due to delays in reporting customer exits at the end of the quarter and waiting for testing exam results, staff need to forward course completion data, testing information and initial employment information to ARC as information is provided by training providers and/or is gathered by staff. This information will be used by ARC to evaluate training provider performance until exit data is available. This is most critical for customers of new providers and/or those organizations placed on hold. Copies of the Customer Completion and Follow-up, and Employment Checklists should be forwarded to ARC as information is verified by staff. Copies of course completion certificates, diplomas and/or independent testing need to be uploaded to VOS.

Customers who have discontinued training or who have been unable to attend training activities for more than 30 days will need approval from their Career Advisor to return to training and/or resume their training activities. Customers who have been unable to return to training for a 90-day period will have their training plan terminated. At such time as they are ready and able to return to training, they will need to re-apply for services. Re-application for services after termination is not a guarantee for services, and staff will review these requests on a case-by-case basis. Customers, who have been unable to attend training due to a serious health or medical problem, or a medical problem or death of a close family member, will be reviewed on a case-by-case basis.

**Modifications to customer training plans** may be approved on a case-by-case basis in order for customers to finish their specified approved course of training. Examples of this may include:

1. a customer is unable to complete their original training due to scheduling problems with the school and no significant additional cost is incurred;
2. a school no longer offers a course or major component of a training outline, and a similar course is available from another vendor;
3. a training provider is no longer in operation and the customer needs to complete or begin another training program offered by another vendor.

In general, significant extensions and/or major changes to customer training plans will not be approved. Examples of training plan changes which may not be approved include:

1. changing course of study from a one-year certificate program to a two year associates degree;
2. adding another training course, after the completion of the originally-planned training programs;
3. additional cost of re-taking core courses in efforts to improve grade point averages to be admitted to preferred course of study (highly competitive programs such as nursing);
4. adding a new program, that was not available or approved at the time the customer's course of study was approved, to the customer's course of study.

Customers will be required to finish sequential training components outlined in a course of study before advancing to the next training component. Specific courses of study, particularly within the information technology arena, will also require that customers take and pass course related independent industry certification exams, before advancing to the next course component. Customers will generally be required to schedule and take exams within 30 days of each related course component. In the event that a customer fails the exam and is unlikely to pass the exam after repeating the course, alternative courses may be explored and/or approved for funding on a case-by-case basis.

**Gathering Placement Verification Information** should occur for all participants during the first few days of employment. All one-stop managers must establish regular procedures for gathering verifiable wage information for all customers. Verification of employment should be attempted in writing and gathered at the time of exit when initial placement information is gathered. Verification of employment must also occur again, each quarter after exit. Career Resource Center staff need to independently verify employment that has been reported by training providers.

Efforts must be exerted by one-stop staff to gather written verification of placement information at the time employment begins.

- < This may be written verification or a copy of a check stub. It cannot be staff attestation or phone verification.
- < Staff must follow-up and verify employment as well training status information provided by training providers. Training status information should be confirmed during conversations with customers.
- < Staff should also determine if the type of employment the customer has found is likely to be with an employer who does not report to the UI system. This may include government employment, military, contract employment where the customer may receive a 1099 instead of a W-2 Form, some hospitals, and boards of education, and self-employment.
- < Staff may utilize The Work Number and the GDOL UI Wage Verification screens.

### **Determining When to Exit WIOA Customers**

Exiting customers from WIOA services should occur after careful consideration of several factors. Some possible criteria for appropriate exit may include:

- After completion of probationary periods.
- After earning a raise.
- After becoming eligible for other employer benefits.
- When customer is settled on the job, all family-work related issues are resolved are fairly stable, or you feel comfortable that the customer will be able to get another job quickly if they lose their current one.
- Never exit until you are sure they will be working a year later!
- After a customer has finished all testing and/or earned appropriate industry certification in the area they received training. Never exit a customer before they earn a credential if it appears likely they will earn one.
- Double check all contact information in the system and in your notes. Check address, phone, cell phone, email and contact addresses for people not residing with the customer.
- Focus on how to improve the customer's income improvement plan once they are placed. This may be working with them to get more hours, increase their hourly wage, complete probationary period, receive health care, etc..
- Does the employment information suggest an earnings increase?
- Is the customer on an extended probation period?
- Are there any planned gaps in earnings or employment such as pregnancy or other factors?
- Has the customer been advised on the customer service satisfaction questions?
- Is the customer deceased, institutionalized or has a significant health problem?
- Does the customer need any additional services?
- Three positive indicators that a customer will remain employed are:
  - A. Job - Is the customer getting the hours, pay and performing duties they expected on the job? Does the customer get along with their supervisor?
  - B. Social - Has the customer made friends on the job?
  - C. Child care/transportation - Are all current arrangements working out and appear to be adequate?
- How is the customer doing in the eyes of the employer/supervisor? Have you contacted the new supervisor?
- Has the employment been documented with contact from the employer?

Remember to establish customer expectations for life-long job placement assistance. Exit customers when staff seem to think they are stable. Be careful of seasonal trends for exiting customers, i.e., Christmas for retail.

Customers may also be exited who have failed to find employment after a reasonable job search. This may include customers who have health/medical related issues, those who might fall into a group of customers who may never find employment due to unresolved personal problems and barriers, and those who refuse to work with staff. If a customer is actively looking for work, and staff are providing job search assistance, a customer may be left in job search assistance for an indefinite period of time. Assistance being provided must be recorded in VOS. Other factors such as current labor trends may also influence when it is a good time to exit a customer. In most instances, 3-6 months should be a reasonable time period for customers to find training related employment. Delays in reporting a customer as exiting might be appropriate if a customer is scheduled for testing exams and/or test results. Customers who fail to take and/or pass industry specific exams within a reasonable time period should be considered for exiting if they have found employment that is training related and/or employment that might be the best that a customer can find during the current labor market and personal circumstances. In general, most customers should be taking exams within a few weeks of finishing courses that prepare them for industry specific licensing. The longer the gap between course completion and examination, the more the likely the customer will not pass the exam.

**Staff will complete the Customer Activity Checklist and forward to ARC for approval.** Staff will complete the gray area and other relevant information on a form partially completed by training provider staff. Staff should gather information on a regular on-going basis and stay

in touch with customers as they find employment. One-stop staff should meet with their managers and make recommendations for customers who might be appropriate for exiting. Exit dates will be evaluated by ARC staff based on last services received and the beginning dates of employment. Accurate information on the completion of training (last day attended) as well as certification information is critical during the assignment of exit dates. Complete information on the employer as a clear job title and whether or not the job is training related is also critical. Staff will be advised by ARC staff of the status of customers recommended for exiting. Exit forms should be forwarded to ARC on regular basis as customers are placed. Staff will be notified to enter the exits on VOS pending follow-up with the customer/employer to determine if the customer is still employed.

**Activity Checklist forms** should be submitted to ARC with all information completed along with copies of any course completion certifications and/or industry specific certifications earned. It is key that staff comment on course completion activity for performance reporting as well as help identify financial issues for customers who did not finish training as planned. Staff need to be specific on individual courses completed and status of exams. Copies of recent contact notes must be attached for all customers who are being reported as unsuccessful exits (not working or successful youth program completion).

**Exiting Customers who are not employed** should be forwarded to ARC for approval on the *WIOA Customer Employment/End of Service Form*. Customers who have not been participating in training or job search activities for a period of 90 days or greater are to be considered for exiting. Copies of recent counseling or contact notes must be attached when forwarding for approval.

**Follow-Up for WIOA services** is technically defined as the time period after exit up to three quarters later. While follow-up and regular on-going case management is often interchanged when describing regular customer contact, WIOA follow-up is often less career than during the training and placement phases of services. Contact during the first quarter after exit, should occur during the first 4 weeks. If the customer is still employed, and requests no additional services, contact should continue on a bi-monthly basis. During this first follow-up contact, staff should request that the customer forward verification of their employment for your files. This is most critical if your records indicate that the customer's employment is likely not to appear in the UI wage files.

If the customer has lost their job and/or is in need of additional services, contact should continue on a monthly basis through the third quarter after exit. All reasonable efforts to assist customers find employment after they have lost should be provided during the follow-up period. Once the customer has lost their job, they should return to an "career" job search status until they have settled into a new job.

**Supplemental Employment Data Reporting** will be required for all former customers when UI wage records fail to indicate employment during the second and fourth quarters after exit. A list of customers who have no wages is reported quarterly on the VOS federal 9090 reports. ARC and one-stop center staff will attempt to collect Supplemental Employment Data and information must be entered in VOS.

Please be advised that additional information can only be used for employers who do not report to the system such as federal employees, military and for individuals who work as consultants and/or are self-employed. Reporting supplemental information has many positive elements when UI records fail to document employment. If supplemental information is reported, the customer is removed from the earnings gain calculation. Some of the recommended steps for the collection process of supplemental data include:

1. Contact the customer to determine if they worked anywhere during the time period. If yes, continue with efforts to collect supplemental data. If no, determine if the customer would like additional assistance.

2. Collect appropriate information from the customer regarding employment. If possible obtain a copy of the customer's check stub, or obtain enough information to contact the employer to verify employment status and earnings.
3. Contact the employer by phone and request additional information. Personalize and forward the cover letter and Customer Supplemental Employment Data form to the customer's employer to complete. This may be sent by fax or email. Be sure to market one-stop services to the business during this contact with the business.
4. Submit completed information to ARC for review and data entry if appropriate.

Remember, the supplemental data must be verified for the reporting time period (either the second or fourth quarter after exit) and not for the initial verification period at the beginning of the customer's employment. If initial verification of employment was obtained, and the customer is still employed, company contact person information should already be on file. This customer contact to obtain additional employment verification should be a part of the regular ongoing customer service contact plan. One-stop staff should plan on obtaining a number of signed customer statements releasing employment information.