
Southwest Wisconsin Workforce Development Board

Workforce Innovation and Opportunity Act

Program Guide
For
Program Year PY2017.18



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SWWDB Program Operator's Guide – Table of Contents

1. GENERAL INFORMATION	1
1.0 WORKFORCE INNOVATION AND OPPORTUNITY ACT OVERVIEW	1
1.1 WORKFORCE INNOVATION AND OPPORTUNITY ACT TITLES	1
<i>Title I: Workforce Investment System</i>	1
<i>Title II: Adult Education and Literacy</i>	1
<i>Title III: Workforce Investment Related Activities</i>	1
<i>Title IV: Rehabilitation Act Amendment of 1998</i>	2
<i>Title V: General Provisions</i>	2
1.2 FUNDING CATEGORIES	2
2. KEY ADMINISTRATIVE POLICIES AND GUIDELINES	2
2.0 PRIORITY OF SERVICE FOR VETERANS	2
2.1 PRIORITY OF SERVICE UNDER THE WIOA ADULT PROGRAM	4
2.2 HATCH ACT AND POLITICAL ACTIVITIES	7
2.3 SERVICES TO IMMEDIATE FAMILY, FRIENDS AND/OR SELF	7
2.4 EQUAL OPPORTUNITY	7
2.5 UNIVERSAL ACCESS	9
2.6 INCLUSIONS AND EXCLUSIONS FOR DETERMINING FAMILY INCOME	9
2.7 SELF-SUFFICIENCY	10
3. THE JOB CENTER	11
3.0 JOB CENTER STANDARDS OF SERVICE	11
3.1 JOB CENTER REFERRAL	14
4. WIOA TITLE I SERVICES OVERVIEW	14
4.0 WIOA SERVICE CHART	16
4.1 CAREER SERVICES – ADULT AND DISLOCATED WORKER	17
<i>Key Definition: Universal Access</i>	17
<i>Key Definition: Registration</i>	18
4.2 STAFF ASSISTED INDIVIDUALIZED CAREER SERVICES – ADULT AND DISLOCATED WORKER	18
4.3 ASSESSMENT SERVICES	18
4.4 PERSONALIZED ASSESSMENT SESSION (GOAL SETTING)	19
4.5 TRANSITION TO TRAINING SERVICES	19
4.6 TRAINING SERVICES	19
4.7 RECOGNIZED POSTSECONDARY CREDENTIALS (NEW)	20
4.8 SECONDARY SCHOOL DIPLOMA OR ITS RECOGNIZED EQUIVALENT (NEW)	20
4.9 SUPPORT SERVICES	21
4.10 FOLLOW-UP SERVICES	21
4.11 FOLLOW-UP ADULT AND DISLOCATED WORKER	22
4.12 FOLLOW-UP FOR YOUTH CLIENTS	22
5. CASE MANAGEMENT RESPONSIBILITIES, FORMS, GUIDELINES AND TOOLS	22
5.0 CASE MANAGEMENT/CAREER PLANNING POLICY (SWWDB POLICY E-120)	22
5.1 REGISTRATION AND ELIGIBILITY	24
5.2 APPLICANT STATEMENT (SELF-ATTESTATION) PROCEDURE (SWWDB E-120-1)	24
5.3 EMPLOYABILITY PLAN	26
5.4 VIRTUAL JOB CENTER SERVICES	26
5.5 TRAINING PROGRAM APPROVAL	26
<i>Key Definition: Individual Training Account (ITA)</i>	27
5.6 PAYMENT AUTHORIZATION SYSTEM (PAS)	27
5.7 TRAINING AND SUPPORT SERVICE PAYMENTS (SWWDB POLICY E-420)	28
5.8 JOB PLACEMENT ACTIVITIES	33
5.9 CUSTOMER SATISFACTION SURVEYS	33
5.10 CORRECTION OF DEFICIENCIES OR UNACCEPTABLE PERFORMANCE	33

SWWDB Program Operator’s Guide – Table of Contents

5.11	QUARTERLY MEETINGS _____	34
5.12	ADDITIONAL RESOURCES, DEFINITIONS AND LINKS _____	34
6.	FILE MAINTENANCE _____	34
6.0	FILE MAINTENANCE REQUIREMENTS _____	34
6.1	REQUIRED CASE FILE FORMS AND DOCUMENTS _____	35
6.2	REQUIRED FORMS _____	36
	<i>WIOA Application</i> _____	36
	<i>Career Roadmap</i> _____	37
	<i>Dislocated Worker Verification Form</i> _____	37
	<i>Individual Checklist for WIOA Career Services</i> _____	37
	<i>WIOA Rights, Responsibilities & Requirements Form</i> _____	37
	<i>Participant Complaint, Grievance and Appeal Procedure Acknowledgement Form</i> _____	37
	<i>Verification of Disability Form</i> _____	38
	<i>Participant’s Permission to Release Records Form</i> _____	38
	<i>Employment Verification General Release Form</i> _____	38
	<i>Youth Barrier Verification for WIOA Service Form</i> _____	38
	<i>Youth Emancipation Form</i> _____	39
	<i>Selective Service Verification</i> _____	39
	<i>WIOA Fund Coordination Worksheet and Financial Aid Verification</i> _____	39
6.3	DOCUMENTING INDIVIDUALIZED CAREER SERVICES _____	40
6.4	DOCUMENTING TRAINING SERVICES _____	40
6.5	DOCUMENTING SUPPORTIVE SERVICES _____	40
6.6	DOCUMENTATION PERTAINING TO EXITS _____	40
6.7	EXITING CLIENTS _____	40
6.8	CASE FILES FOR EXITED CLIENTS _____	41
6.9	FILE MONITORING _____	41
6.10	FILE RETENTION _____	41
6.11	CASE NOTES _____	42
6.12	ASSET REQUIREMENTS FOR CASE NOTES _____	42
7.	WIOA COORDINATION WITH OTHER PROGRAMS, SERVICES, FUNDING _____	43
7.0	COORDINATION WITH OTHER TRAINING FUNDING _____	43
7.1	WIOA / TAA CO-ENROLLMENT _____	44
7.2	CONCURRENT ENROLLMENT OF YOUTH IN THE ADULT/DISLOCATED WORKER PROGRAMS _____	44
8.	ADULT AND DISLOCATED WORKER PROGRAM _____	45
8.0	WIOA ADULT PROGRAM _____	45
	<i>General Eligibility Requirements</i> _____	45
	<i>Locally Defined Eligibility Requirements</i> _____	45
	<i>Priority of Service</i> _____	45
8.1	WIOA DISLOCATED WORKER PROGRAM _____	45
	<i>General Eligibility Requirements</i> _____	46
	<i>Federal Dislocated Worker Criteria</i> _____	46
	<i>Key Definition: General Announcement</i> _____	47
	<i>Key Definition: Underemployed</i> _____	47
	<i>Locally Defined Eligibility Requirements</i> _____	48
8.2	ELIGIBILITY FOR CAREER SERVICE (ADULT AND DISLOCATED WORKER) _____	48
	<i>Key Definition: Individual Employment Plan</i> _____	48
8.3	ELIGIBILITY FOR TRAINING SERVICES _____	48
	<i>Key Definition: Unlikely to Return to a Previous Industry or Occupation</i> _____	49
9.	WIOA YOUTH PROGRAM _____	49
9.0	YOUTH DEFINITIONS _____	50

SWWDB Program Operator’s Guide – Table of Contents

<i>Activities to Help Youth Transition to Post-Secondary Education and Training:</i>	50
<i>Alternative Education/School:</i>	50
<i>Application:</i>	50
<i>Attending School:</i>	50
<i>For youth who have graduated from high school, and are either enrolled/registered or simply planning to attend college, status is still determined at the time of enrollment. A youth participant under these circumstances would be considered an OSY. However, if school has started and the youth is attending school, they would be considered in-school. In addition, 22 to 24 year olds attending post-secondary school would never be considered ISY since ISY must only be ages 14 – 21.</i>	
<i>Basic Skills Deficient</i>	50
<i>Compulsory School Attendance:</i>	50
<i>Disabled Youth</i>	50
<i>Disability:</i>	50
<i>Dropout:</i>	50
<i>Education offered concurrently with and in same context as workforce preparation:</i>	50
<i>English Language Learner:</i>	51
<i>Entrepreneurial skills training:</i>	51
<i>Exit:</i>	51
<i>Family:</i>	51
<i>Financial Literacy:</i>	51
<i>High Poverty Area:</i>	51
<i>Homeless Youth:</i>	51
<i>In-School-Youth (ISY):</i>	51
<i>Low Income:</i>	51
<i>Migratory Child:</i>	52
<i>Offender:</i>	52
<i>Out-of-Home Placement:</i>	52
<i>Out-of-School Youth (OSY):</i>	52
<i>Participant:</i>	52
<i>Pregnant or Parenting Youth:</i>	52
<i>Requires Additional Assistance (ISY):</i>	52
<i>Requires Additional Assistance (OSY):</i>	53
<i>A. Lacks high school diploma</i>	53
<i>B. Post-secondary educational program drop-out during the past 12 months</i>	53
<i>C. Has a diploma but is in need of additional education or training</i>	53
<i>D. Has not held a full-time job (30 hours or more) for more than six consecutive months</i>	53
<i>E. Poor work history, to include no work history</i>	53
<i>F. Fired from a job in the last six calendar months</i>	53
<i>G. Lacks work readiness skills necessary to obtain and retain employment</i>	53
<i>H. Being raised by someone other than biological parent</i>	53
<i>I. Child of a parent offender</i>	53
<i>J. Lacks occupational and/or educational goals/skills</i>	53
<i>K. Expulsion from school</i>	53
<i>L. Youth at-risk of court involvement</i>	53
<i>M. Gang affiliation</i>	53
<i>N. Refugee/immigrant</i>	53
<i>O. Substance abuse, current or past</i>	53
<i>P. Family history of chronic unemployment</i>	53
<i>Q. Resides in an area of high unemployment or crime</i>	53
<i>R. Victim/witness of domestic violence or other abuse</i>	53
<i>S. First generation high school graduate</i>	53
<i>Self-Certification:</i>	53
<i>Services that Provide Labor Market and Employment Information:</i>	53
9.1 YOUTH APPLICATION	53
9.2 YOUTH ELIGIBILITY	54

SWWDB Program Operator’s Guide – Table of Contents

General Eligibility	54
Local Eligibility	55
5% Exception:	55
Out-of-School Youth Priority	55
Non-graduated 17-year olds	55
Graduated 17 year olds	55
Young Adults Ages 22 – 24	56
9.3 YOUTH REGISTRATION	56
9.4 YOUTH ELIGIBILITY DOCUMENTATION	56
9.5 INFORMATION AND REFERRAL	57
9.6 ASSESSMENT	57
<i>TABE (Test of Adult Basic Education)</i>	57
9.7 INDIVIDUAL SERVICE STRATEGY (ISS)	58
<i>Key Definition: Individual Service Strategy</i>	58
9.8 SKILL ATTAINMENT GOALS	58
9.9 PROGRAM ELEMENTS	59
<i>PE1: Tutoring, Study Skills Training, Instruction Leading to Completion of Secondary School, Including Dropout Prevention Strategies</i>	60
<i>PE2: Alternative Secondary School Services</i>	60
<i>PE 3: Paid and Unpaid Work Experiences</i>	60
<i>PE 4: Occupational Skill Training</i>	62
<i>PE 5: Education Offered Concurrently with Workforce Preparation Activities</i>	62
<i>PE 6: Leadership Development Opportunities</i>	62
<i>PE 7: Support Services</i>	63
<i>PE 8: Adult Mentoring</i>	63
<i>PE 9: Follow-up Services</i>	63
<i>PE 10: Comprehensive Guidance and Counseling</i>	63
<i>PE 11: Financial Literacy Education</i>	63
<i>PE 12: Entrepreneurial Skills Training</i>	64
<i>PE 13: Labor Market and Employment Information</i>	65
<i>PE 14: Preparation Activities</i>	65
9.10 OUT-OF-SCHOOL YOUTH (OSY)	65
9.11 INCENTIVE AWARD PAYMENTS TO WIOA YOUTH (SWWDB POLICY C-740)	65
10. COMMON PERFORMANCE INDICATORS	67
10.0 ADULT AND DISLOCATED WORKER	67
<i>Employment Rate (Q2 & Q4 post-exit)</i>	67
<i>Median Earnings (Q2 post-exit)</i>	67
<i>Credential Attainment Rate</i>	67
<i>Measurable Skills Gain</i>	69
10.1 YOUTH	69
<i>Placement in Employment/Training/Education (Q2 & Q4 post-exit)</i>	69
<i>Median Earnings (Q2 post-exit)</i>	69
<i>Credential Rate</i>	70
<i>Measurable Skills Gain</i>	71
10.2 EMPLOYER	72
10.3 TIMING OF PERFORMANCE INDICATOR	72
10.4 EXCLUSIONS	73
10.5 PARTICIPATION TRIGGERS	74

1. General Information

2.0 WORKFORCE INNOVATION AND OPPORTUNITY ACT OVERVIEW

The goal of the Workforce Innovation and Opportunity Act of 2014 (WIOA) is to provide workforce investment activities, through statewide and local workforce investment systems, that increase the employment, retention, earnings, and occupational skill attainment of participants, thereby improving the quality of the workforce, reducing welfare dependency, and enhancing the productivity and competitiveness of the Nation. WIOA provides the framework for a unique, regionally based workforce preparation and employment system designed to be customer-focused in meeting both the needs of business for skilled workers and assisting individuals in easily accessing information and services needed to manage their careers. The law embodies five key principles:

- A. Align programs and ensure integrated services through a unified strategic plan and shared governance.
- B. Facilitate public-private partnerships; support sector strategies and career pathways that advance opportunities for all workers and jobseekers, including low-skilled adults, youth, and individuals with disabilities; foster innovation; and ensure streamlined operations and service delivery excellence.
- C. Govern the workforce system regionally; create unified regional and local plans integrating education, training, support services, and other workforce services across the core programs; align workforce policies and services with regional economies; and support sector strategies tailored to their needs.
- D. Increase coordination of programs and resources to support a comprehensive system that seamlessly provides integrated services that are accessible to all jobseekers, workers, and businesses.
- E. Ensure investments in employment, education, and training programs are evidence-based and data driven, and programs are accountable to participants and taxpayers.

2.1 WORKFORCE INNOVATION AND OPPORTUNITY ACT TITLES

WIOA is divided into 5 Titles each dealing with important aspects of the Workforce System that, when combined, provide a broad framework of services geared to address the workforce issues facing workers and employers. SWWDB and its program operators function primarily under Title I.

Title I: Workforce Investment System

Title I of WIOA seeks to provide universal access to employment and training programs through a nationwide network of one-stop centers administered through state and local Workforce Investment Boards (WIBs). WIOA Title I provides federal funding to support the provision of individual training and support services (Adult, Dislocated Worker and Youth Programs), establishes a governance and operations infrastructure, and sets performance and accountability standards for Title I-funded programs.

Title II: Adult Education and Literacy

Title II incorporates Adult Education and Family Literacy Act into the WIOA. Funds are allocated to the states, which then contract for local services.

Title III: Workforce Investment Related Activities

- A. Wagner/Peyser Act established labor exchange activities under the One-Stop system.
- B. Establishes links between authorized programs under WIOA and other programs including the Trade Adjustment Assistance Act, the Veterans Employment Act, and the Senior Community

Service Employment Programs. The purpose of these linkages is to insure that the recipients do not receive duplicate assistance and are moved into the workforce effectively.

Title IV: Rehabilitation Act Amendment of 1998

Title IV requires the State Vocational Rehabilitation agency to enter into cooperative agreements with other programs that are part of the statewide workforce investment system.

Title V: General Provisions

Title V establishes/requires: Unified State Plan, Definitions for Indicators of Performance, Incentive Grants, Privacy Provisions, etc.

2.2 FUNDING CATEGORIES

SWWDB receives WIOA funding in three categories: adults, dislocated workers, and youth. The youth category is divided into two subcategories: younger or in-school youth and older or out-of-school youth. The younger or in-school youth contract provides services to participants 14 – 21 years of age who are enrolled in study leading to a secondary or post-secondary education. The older or out-of-school youth contract provides services to those individuals who are between the ages of 16 and 24 years of age who dropped out of high school or who have graduated and are in need of workforce services to achieve employment that will lead to self-sufficiency. Concurrent enrollment is allowable between the out-of-school youth, adult and dislocated worker programs.

2. Key Administrative Policies and Guidelines

2.0 PRIORITY OF SERVICE FOR VETERANS

The Jobs for Veterans Act (JVA), Public Law (P. L.) 107-288, was signed into law on November 7, 2002. One provision of the JVA established a priority of service requirement for covered persons (i.e., veterans and eligible spouses, including widows and widowers, as defined by this statute) in qualified job training programs. Since the passage of the JVA, recipients of DOL funds for qualified job training programs have been required to provide priority of service to covered persons. On December 22, 2006, the Veterans' Benefits, Health Care, and Information Technology Act of 2006 (P.L. 109-461) was enacted and required DOL to implement priority of service via regulation. 20 CFR Part 1010, published on December 19, 2008, reflects the DOL's response to that statutory requirement. The Final Rule, which took effect on January 19, 2009, requires the recipients of federal job training funds to review and, if necessary, enhance their current policies and procedures to ensure that adequate protocols are in place. This document provides the policy for the Southwest Wisconsin Workforce Development Board (SWWDB) regarding the implementation and administration of the Priority of Service for veterans and eligible spouses for all Workforce Innovation and Opportunity (WIOA) programs operated by SWWDB.

Policy.

It shall be the policy of SWWDB to provide veterans and eligible spouses, including widows and widowers as defined in the statute and regulations, priority of service under all DOL funded programs.

Definitions.

Active (service): full-time Federal service in the National Guard or a Reserve component; does not include full-time duty performed strictly for training purposes nor does full-time active duty performed by personnel mobilized by State rather than Federal authorities.

Veteran: person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions that were not dishonorable.

Eligible spouse: the spouse of any of the following:

- a. Any veteran who died of a service-connected disability;
- b. Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - i. Missing in action;
 - ii. Captured in the line of duty by a hostile force; or
 - iii. Forcibly detained or interned in the line of duty by a foreign government or power;
- c. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs;
- d. Any veteran who died while a disability was in existence.
- e. A spouse is also considered a dislocated worker when the spouse has lost employment as a direct result of a relocation to accommodate a permanent change in duty station of the military service member spouse.

A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

Priority of Service for all Department of Labor (DOL) – Funded Programs

For the purposes of establishing priority of service for veterans and eligible spouses under any Department of Labor (DOL) funded programs, SWWDB establishes the following priorities for service:

- *First Priority* shall be given to Veterans and eligible spouses.
- *Second Priority* shall be given to all other non-covered persons.

This means that veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training, and placement services provided under all DOL funded programs.

Priority of Service for WIOA Title I Adult Program

For the purpose of establishing priority of service for veterans and eligible spouses, and in conjunction with Policy E-030 – Priority of Service under the WIOA Adult Program, SWWDB establishes the following priorities of service:

- *First Priority* shall be given to potential recipients of individualized career and training services who are veterans/eligible spouses, receiving public assistance, and/or low income and/or basic skills deficient.
- *Second Priority* shall be given to potential recipients of individualized career and training services who are non-covered persons who are receiving public assistance and/or low income and/or basic skills deficient.
- *Third Priority* shall be given to any person otherwise potentially eligible for the WIOA Adult Program.

Participants who are not in a priority of service category but are actively enrolled in a career or training service shall be allowed to continue services identified in their Employment Plan.

The Board directs the Chief Executive Officer (CEO) to develop and maintain a priority of service policy and procedures for veterans and eligible spouses that complies with applicable regulations as they may change from time to time. The CEO shall ensure that required data to document veterans' priority of service are maintained and reported as necessary.

SWWDB shall require every program operator receiving funds through a WIOA contract with SWWDB to provide veterans and eligible spouses' priority of service as outlined in this policy. Program operators shall inform covered individuals of their right to priority for employment and training services by establishing organizational processes that will enable veterans and eligible spouses to identify themselves at the point of entry to the system or program where they will be given the opportunity to take full advantage of the priority. Furthermore, program operators shall provide veterans and eligible spouses' information on all services available under WIOA Title I programs and all eligibility requirements necessary for participation. Contracted program operators may provide the information either verbally or in writing during orientation, assessment, or enrollment.

SWWDB shall require service providers to collect and report the required data elements for covered persons enrolled into WIOA Title I programs. SWWDB shall, during its monitoring processes, ensure that the grantee's systems and procedures comply with this policy. Failure by the grantee to comply is considered a service deficiency requiring immediate action to comply with the policy.

Program operator compliance with this policy will be reviewed during the SWWDB monitoring and will be a factor in SWWDB's evaluation of the program operator's performance. Any disallowed costs associated with failure of the program operator or its staff to comply with this policy will be the responsibility of the program operator.

2.1 PRIORITY OF SERVICE UNDER THE WIOA ADULT PROGRAM

Purpose.

The Workforce Innovation and Opportunity Act (WIOA) Section 134(c)(3)(E), states that in regard to funds allocated to a local area for adult employment and training activities, priority shall be given to recipients

of public assistance, other low-income individuals, and individuals who are basic skills deficient for receipt of career services and training services.

This document defines the policy of the Southwest Wisconsin Workforce Development Board (SWWDB) in applying the federal provisions related to priority of service.

Definitions.

In application of this policy, the following definitions apply:

Basic Skills Deficient:

1. who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
2. who is a youth or adult that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Covered individual: is someone who is a Veteran and/or eligible spouse.

Low-Income Individual: In general, the term "low income individual" means an individual meets one of the criteria below:

1. Receives, or in the past six (6) months has received, or is a member of a family that is receiving or in the past six (6) months has received, assistance through:
 - a. The Supplemental Nutrition Assistance Program (SNAP) established under the Food and Nutrition Act of 2008, (7 U.S.C. 2011 et seq.); or
 - b. The program of block grants to states for Temporary Assistance for Needy Families (TANF) program under part A of Title IV of the Social Security Act (42 U.S.C. 601 et seq.); or
 - c. The Supplemental Security Income (SSI) program established under Title XVI of the Social Security Act (42 U.S.C. 1381 et seq.); or
 - d. State or local income-based public assistance.
2. Is in a family with total family income that does not exceed the higher of:
 - a. The poverty line; or
 - b. 70 percent of the Lower Living Standard Income Level (LLSIL)
3. Is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 1143a(2)));
4. Receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);
5. Is a foster child on behalf of whom state or local government payments are made;
6. Is an individual with a disability whose own income meets the income requirement of clause (ii) (i.e., the poverty line; or 70% of the Lower Living Standard Income Level (LLSIL)) but who is a member of a family whose income does not meet this requirement.

Priority: a covered individual shall take precedence (priority) over a non-covered individual in obtaining individualized career and training services. Once established as a covered individual under this policy, an

individual shall receive access to individualized career and training services instead of or before a non-covered person. However, priority does not allow for the "bumping" of a non-covered individual who has previously been accepted and approved for these services in accordance with the individual's Employment Plan.

Policy.

In accordance with WIOA provisions and regulations, SWWDB provides workforce-related services and training to eligible participants to the broadest extent possible. It shall be the policy of SWWDB to give priority to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. Priority of service shall apply to covered clients eligible for adult WIOA career and training activities. Dislocated workers are not subject to this requirement.

SWWDB shall apply, in conjunction with Policy E-070 – Veterans Priority of Service, the following priorities for service:

- *First Priority* shall be given to potential recipients of individualized career and training services who are veteran/eligible spouses, receiving public assistance, and/or low income and/or basic skills deficient.
- *Second Priority* shall be given to potential recipients of individualized career and training services who are non-covered persons who are receiving public assistance and/or low income and/or basic skills deficient.
- *Third Priority* shall be given to any person otherwise eligible for the WIOA Adult Program.

The Board directs the Chief Executive Officer (CEO) to develop and maintain priority of service policy and procedures that comply with WIOA and other applicable regulations as they may change from time to time. The Chief Executive Officer (CEO) shall ensure that required systems and procedures are developed and maintained.

SWWDB shall require every program operator receiving adult funds through a WIOA contract with SWWDB to provide recipients of public assistance, other low-income individuals, and basic-skills deficient adults priority of service as outlined in this policy. Program operators shall inform covered individuals of their right to priority for career and training services by establishing organizational processes that will enable recipients of public assistance and other low-income individuals to identify themselves at the point of entry to the system or program where they will be given the opportunity to take full advantage of the priority. Furthermore, program operators shall provide recipients of public assistance and other low-income individuals with information on all services available under the WIOA Adult programs and all eligibility requirements necessary for participation. Contracted program operators may provide the information either verbally or in writing during orientation, assessment, or enrollment.

SWWDB will also update managed websites, in accordance with Veterans' Program Letter 07-09, to inform veterans/eligible spouses of their entitlement to priority of service.

Program operator compliance with this policy will be reviewed during the SWWDB monitoring and will be a factor in SWWDB's evaluation of the program operator's performance. Any disallowed costs associated with failure of the program operator or its staff to comply with this policy will be the responsibility of the program operator.

Deviations from this policy are not allowed.

2.2 HATCH ACT AND POLITICAL ACTIVITIES

SWWDB employees and contractors are subject to the provision of the Hatch Act. The Hatch Act limits certain political activities of federally funded employees both on and off duty. Violations of the Hatch Act may result in disciplinary action, up to and including removal.

The term "political activity" means doing something in active support of or opposition to a political party, a candidate for partisan political office (e.g., President, senator, representative, state or local legislature or office), or a partisan political group (e.g., "Historians for Smith"). Examples of political activity that would violate the Hatch Act if done while on duty or using Government property include: circulating a candidate's nominating petition within your office; using the PC in your office after work to produce a brochure in support of a candidate's campaign; sending e-mail invitations to campaign events to friends within the agency; and using National Archives' Internet connections to forward e-mail messages received from a partisan campaign or someone supporting a partisan candidate. Permissible political activity under the Hatch Act would include voting for the candidates of your choice; expressing opinions about candidates and issues; and assisting in voter registration drives. (Hatch Act - U.S. Code Title 5, Part II, Chapter 15 and SWWDB Policy B-541 – Political Activity)

2.3 SERVICES TO IMMEDIATE FAMILY, FRIENDS AND/OR SELF

WIOA prohibits any employee of a grantee or contractor organization from recommending or deciding to hire, promote, or establish the salary of another person when the person affected is a member of his/her immediate family. WIOA also prohibits an employee from giving preferential treatment in the supervision or management of another person who is a member of his/her immediate family.

A case manager is not allowed to exercise any type of control over and shall be prohibited from initiating or participating, in any way, in any decisions involving the assignment, certification, or awarding of any direct program benefit to a relative, friend, or himself/herself. This includes the completion of all enrollments, assessments, and the development of an appropriate employment plan. Any staff member enrolled as a participant in a program shall not be allowed to obligate and/or issue any form of voucher or payment to themselves.

Any case manager who becomes involved in a conflict shall notify his/her supervisor of the situation and the supervisor shall immediately assign another staff member to:

- A. Manage the eligibility determination activities consistent with all programmatic eligibility requirements;
- B. Enroll the person in programs and services consistent with services provided to other program participants, and;
- C. Oversee documentation of participant achievement and attainment of programmatic outcomes.

2.4 EQUAL OPPORTUNITY**Purpose.**

Southwest Wisconsin Workforce Development Board (SWWDB) is committed to the primary principles of nondiscrimination, equal opportunity, and affirmative action. SWWDB shall honor this commitment to be fair and impartial in all its relations with employees and job applicants, clients using SWWDB services, and contractors and suppliers providing goods and services. This policy establishes the SWWDB Equal Opportunity and Affirmative Action Policy. It is the intent of this policy to comply with all applicable, as they may change from time to time, federal and state equal opportunity and anti-discrimination laws and executive orders.

Policy.

It shall be the policy of SWWDB to provide equal opportunity in all of its employment actions and practices without regard to age, race, creed, color, religion, disability, marital status, sex, national origin, ancestry, arrest record, conviction record, sexual orientation, membership in the national guard, state defense force or any reserve component of the military forces of the United States or this state, political affiliation, genetic testing, and the use or non-use of lawful products off the employer's premises during non-working hours. Furthermore, SWWDB does not discriminate against clients in its service actions on the basis of race, color, creed, religion, sex, national origin, disability, ancestry, age, sexual orientation, pregnancy, marital status, or parental status.

Employment actions include but are not limited to: recruitment, selection, promotion, performance appraisals, compensation, transfer, layoff, training, demotion, termination, work assignments, and other benefits of employment. Service actions are defined to include: recruitment, admission, counseling, job placement, training programs, facility and/or program accessibility, and the delivery of other employment and training services authorized by the SWWDB.

Furthermore, SWWDB requires that state and local government agencies receiving Workforce Innovation and Opportunity Act (WIOA) funds, as well as non-governmental WIOA contractors affirm their commitment to equal opportunity and nondiscrimination in all of their employment and service actions. These agencies shall develop and implement non-discrimination and affirmative action policies and procedures that guide their relations with employees and constituency groups consistent with applicable laws.

SWWDB also will make an affirmative effort to maintain an environment free of any type of harassing behavior and will not tolerate any form of harassment of employees, clients, or program participants. SWWDB prohibits harassment on the basis of sex, race, color, national origin, age, disability, or any other protected status.

An Affirmative Action Plan to ensure non-discrimination in employment and service opportunities is monitored by the SWWDB Compliance Officer appointed by the Executive Director.

SWWDB expects all employees, clients, program participants, vendors, associates, and agencies receiving funding from SWWDB to participate in its program of non-discrimination and shall, when appropriate, develop and implement their own equal opportunity policies and procedures.

Retaliation against persons raising concerns about any type of harassment is prohibited and anyone suspected of retaliation will be subject to disciplinary action up to and including discharge or expulsion from SWWDB sponsored activities.

SWWDB will take necessary corrective action to remedy any instances where it is determined that discrimination or retaliation has occurred. Employees discriminating against other staff or clients will be subject to discipline under appropriate SWWDB policies. Clients discriminating against another client will be subject to discipline under the applicable participant code of conduct. Any employee or client retaliating against anyone raising concerns about any type of harassment will be subject to disciplinary action up to and including discharge or expulsion from SWWDB sponsored activities.

SWWDB has an established procedure for resolving complaints relating to discrimination and harassment. Reports of alleged acts of discrimination, complaints of harassment, or inquiries concerning the equal opportunity policies may be filed directly with the SWWDB EEO Officer, 1370 N. Water Street, Post Office Box 656, Platteville, Wisconsin 53818-0656, (608) 342-4224. Complaints must be filed within 300 days of the date that the action causing the complaint occurred.

Reference:

Policy Adopted: December 10, 2004

Policy Revised: *[linked to SWWDB Policy B.110 Equal Opportunity and Affirmative Action Policy]*

2.5 UNIVERSAL ACCESS

The requirements for universal access are addressed in the Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act (WIOA) of 2014, 29 CFR Part 38. These requirements are treated separately from the requirements regarding reasonable accommodation for individuals with disabilities.

The programs and activities established by and financed through WIOA are designed to serve the broadest possible representation of potential customers within the SW Wisconsin Workforce Development Area. The section in the Equal Opportunity (EO) regulations pertaining to universal access is found at 29 CFR Part 38.1. Section 188 of WIOA prohibits discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in a WIOA Title I-financially assisted program or activity.

When advertising programs and activities in the various media (including the internet), Program Operators are to ensure that the above-mentioned groups are targeted and included in those publications, stations, and websites.

Advertisements or program offerings are to be shared with schools and community service agencies that serve the above groups. Outreach activities should be recorded and maintained for monitoring purposes.

The special needs of various groups such as individuals with disabilities and individuals who communicate in languages other than English should be considered when advertising, recruiting, and preparing brochures or other types of publications and electronic communications.

2.6 INCLUSIONS AND EXCLUSIONS FOR DETERMINING FAMILY INCOME

Determining the family or household income may affect eligibility requirements for specific program Title I programs and is required to be collected in accordance with WIOA regulations. This data helps identify low-income individuals as they participate in WIOA programs. The following lists commonly used Included and Excluded income according to WIOA. **See Eligibility Determination and Documentation guide for complete list.**

Included:

- Unemployment compensation (**changed under WIOA**)
- Child support payments (**changed under WIOA**)
- Old-age survivors insurance under Social Security (**changed under WIOA**)
- Any monetary compensation for services, including wages, tips, salary, commissions, piece rate payments, cash bonuses, or fees before deductions.
- Regular payments from pension and retirement systems including private, government, railroad, and military retirement pay
- Severance pay or a cash out of accrued vacation leave
- Alimony (excludes one-time property settlements)
- Regular insurance or annuity (IRAs, KEOUGH, 401 (k) plans, etc.) payments
- OJT wages

Excluded:

- Financial assistance under Title IV of the Higher Education Act (i.e., PELL grants, Federal Supplemental Educational Opportunity grants, and Federal Work Study)
- Stafford and Perkins loans (for educational purposes)
- Cash payments under a Federal, State, or local income based public assistance program (TANF, SSI, RCA, GA, Emergency Assistance)
- Social Security Retirement and Social Security Disability Insurance
- Medicare, Medicaid, food stamps, school meals, and fuel or other housing assistance
- Any assets drawn down as withdrawals from a bank; an employee exclusive 401(k), sale of a home, property, or car
- Payments made to individuals participating from WIOA activities (excluding OJT)
- WISE worker wages

2.7 SELF-SUFFICIENCY

SWWDB administers WIOA services and training intended to help a person earn new job skills and enter employment earning a wage that will make the person and his family self-sufficient. According to WIOA regulations, that is defined as employment that pays at least the lower living standard income level.

It is the policy of SWWDB to establish and keep current a standard of self-sufficiency that can be used to determine whether a person is eligible for WIOA services. In compliance with WIOA regulations, SWWDB defines self-sufficiency as follows:

- Any person whose income is 70% of the county median wage according to the most recent Quarterly Census of Employment and Wages for the county of residence for individuals participating in a WIOA adult program.
- Any person whose income is the higher level of 80% of the participant's wage at layoff or 70% of the county median wage according to the most recent Quarterly Census of Employment and Wages for the county of residence for individuals participating in a WIOA dislocated worker program. Furthermore, the participant must be engaged in permanent employment.

Furthermore, any person who is an eligible adult or dislocated worker, and employed in a transitory or impermanent job shall not be considered self-sufficient even though the prevailing wage proves otherwise. A transitory job is defined as a temporary job following permanent job dislocation.

Additionally, in defining self-sufficiency, SWWDB assumes that employment includes access to reasonably priced health benefits. Reasonably priced health benefits are defined as an employee premium cost equal to or less than 25% of total premium.

When determining self-sufficiency for individuals with disabilities or other barriers to employment, it shall be the policy of SWWDB to look at and consider the following additional criteria:

- SWWDB, in accordance with WIOA regulations, considers a disabled client as a family of one for the purposes of this standard.
- Case managers are to review additional needs that should be addressed to ensure satisfactory progress toward achieving self-sufficiency (accommodations in the workplace; additional economic supports and services to augment wages).

- Case managers are to leverage knowledge and resources with other One-Stop partner agencies to ensure the affected individual has accessed all available resources to achieve self-sufficiency.
- Case managers are to provide longer and more robust follow-up services.

SWWDB will observe and use the above guidelines to determine if program participants are eligible for WIOA career and/or training services in order to obtain or retain employment that allows for self-sufficiency. Furthermore, this definition is to be used when determining a client's access to continued WIOA services once employment has been achieved.

The Board directs the chief executive officer to implement the outlined self-sufficiency standard. The Board further directs the executive officer to update and disseminate the self-sufficiency criteria as the standards may change from time to time, but at least annually.

SWWDB shall require every program operator receiving funds through a WIOA contract with SWWDB to use and apply the approved self-sufficiency in interventions with clients. Program operators, as part of their case managed services, shall use these standards when determining client eligibility and referral for job placement.

Program operator compliance with this policy will be reviewed during the SWWDB monitoring and will be a factor in SWWDB's evaluation of the program operator's performance. Any disallowed costs associated with failure of the program operator or its staff to comply with this policy will be the responsibility of the program operator.

Deviations from this policy are discouraged but will be considered on a case-by-case basis by SWWDB when determined appropriate in the sole judgment of SWWDB.

3. The Job Center

SWWDB is the One-Stop-Operator for Job Centers located in the Southwest Wisconsin Workforce Development Area. The area has a single Comprehensive One-Stop Center, The Rock County Job Center, located in Janesville, WI at 1900 Center Ave. Affiliate sites are currently located in Fennimore, Richland Center, Platteville, Dodgeville, and Monroe, WI.

WIOA Program Operators are key agencies in the operation of the Job Center and in the provision of services throughout the 6-county area. Cooperation in conducting workshops, staffing the resource room and participating in Center events and meetings is an integral factor in the overall performance of the one-stop system.

To ensure the Job Center remains focused on Workforce goals and to prevent duplication of service among Job Center partners, all Partner Agencies at the Rock County Job Center are to adhere to the Job Center Standards of Service.

3.0 JOB CENTER STANDARDS OF SERVICE

The Job Center Service Standards define expectations for serving customers within Job Centers across the State of Wisconsin. The standards will also continue the focus on quality service and ensure consistency of service across the state. The Workforce Development Board is responsible for ensuring that their comprehensive center(s) and any other service locations meet Service Standards.

The Service Standards are broadly stated to allow flexibility in regional program design and local implementation of services. The Service Standards state “what” is to be done; it is up to local groups responsible for the planning and implementation of Job Center services to decide “how” local activities

will meet the Service Standards. The Rock County Job Center Management Team determines plan and practice of achieving these standards.

The standards are crafted around two customer groupings; Administrative/Partner, and Employers and Job Seekers.

A. Administrative/Partner Expectations

- 1) The Job Center has a Memorandum of Understanding (MOU) with all partners that clearly delineate roles and responsibilities in the service delivery system.
- 2) The Job Center meets ADA physical and program accessibility requirements and provide equal access to all services and programs (including resource room materials and services) for all customers, including persons with disabilities and limited English-speaking ability.
- 3) Veterans and qualified spouses shall be given priority over non-veterans in the receipt of any employment, training, and placement services provided in Wisconsin Job Centers.
- 4) The Resource Room/customer service area of the Center is staffed all hours the Center is open. One person who can triage customer needs and refer to programs as appropriate must be on duty at all times the center is open.
- 5) Staff at the Job Center will provide access to all other required WIOA partner programs
- 6) Staff at the Job Center will provide information about available job training and make referrals as needed.
- 7) The Job Center has a credentialed employment counselor who works with all job seeker customers and is on-site each week.
- 8) The Job Center addresses the needs of youthful job seekers.
- 9) The Job Center is participating in a continuous improvement program. Job Center effectiveness in providing services to job seekers and employers will be available to the public.
- 10) The continuous improvement program must ensure a trained, competent staff and that staff participates in a credentialing program. Staff providing services through Job Centers are trained and demonstrate competence in providing consistent, high quality service to business and job seeker customers. Staff possesses the following knowledge:
 - a. Knowledge of available community resources.
 - b. Knowledge of referral process to all partner programs and services as appropriate for the customer's needs.
 - c. Knowledge and assistance with all Job Center tools, technologies, Internet, and computer systems.
 - d. Knowledge and assistance with special needs and overcoming barriers to employment, as needed. Understands special employment needs of diverse populations.
 - e. Knowledge of privacy and confidentiality requirements for all customers.
 - f. Knowledge of customer service techniques including maintaining a professional relationship.
- 11) The Job Center has exterior signage using the common identifier. Interior signage ensures that all customers are able to use the Job Center effectively and includes required posters, room locations, and directions in English and alternate language(s) as appropriate to customer demographics.

- 12) Services are coordinated across programs and not duplicated, to improve efficiency and service to the customer.
- 13) Customers receive services through the Job Center system regardless of race, gender, ethnicity, age, or disability status and in accordance with any other legal protections.
- 14) Privacy and confidentiality is provided for all customers.
- 15) All customers are served in a timely manner according to partner agency policies and guidelines.
- 16) The Job Center has a Business Services Team that will provide business services in an integrated non-duplicative manner and is consistent with the regional Business Services Plan.

B. Employer and Job Seeker Expectations

Every customer should expect:

- 1) Access to JobCenterofWisconsin.com to make connections between job seekers and employers.
- 2) The level of service provided will be appropriate to individual customer's needs and consistent with program requirements.
- 3) Regularly scheduled financial literacy education and assistance, information about and referral to credit rehabilitation counseling.
- 4) Veterans and qualified spouses shall be given priority over non-veterans in the receipt of any employment, training, and placement services provided in Wisconsin Job Centers.
- 5) Access to all other required WIOA partner programs.
- 6) Information about available job training and receive referrals as needed.
- 7) Access to an employment counselor who works with all job seeker customers and is on-site each week.
- 8) To make informed choices, within available services, and be assisted in determining service options.
- 9) Services are coordinated across programs and not duplicated, to improve efficiency and service to the customer.
- 10) Program information is accessible in various delivery formats to ensure understanding by the customer, e.g., oral/written translation services, interpreter services/sign language, etc.
- 11) Accommodations are made for customers' special needs (physical and programmatic).
- 12) Customers receive services through the Job Center system regardless of race, gender, ethnicity, age, or disability status and in accordance with any other legal protections.
- 13) Privacy and confidentiality is provided for all customers.
- 14) Staff providing services through Job Centers are trained and demonstrate competence in providing consistent, high quality service to business and job seeker customers.
- 15) All customers are treated with respect and served in a timely manner.
- 16) Information on education, employment and training services.
- 17) Information on local services, potential eligibility requirements, and how and where to access those services.
- 18) Information about support services needed to maintain employment.

- 19) Initial, comprehensive and specialized assessments as appropriate to the customers' needs and program requirements.
- 20) Career planning with an emphasis on jobs in the area that provide family-supporting wages and benefits, including nontraditional occupations.
- 21) Current job openings, the qualifications associated with these openings, and application.
- 22) Assistance with job search, including resume writing, interviewing, seeking nontraditional employment positions, using labor market information and locating the "hidden job market," career ladders, and high wage, high demand occupations.
- 23) Information on the Unemployment Insurance (UI) filing and claims update processes.
- 24) Financial literacy training such as the wise use of credit and financial asset building, and credit rehabilitation counseling.
- 25) Be greeted by someone who can determine their needs and refer them to programs, as appropriate.

3.1 JOB CENTER REFERRAL

A standardized job center referral process is a key part to ensuring that job center customers receive the appropriate and necessary services to assist with attaining their employment goals. The referral process provides WIOA staff and other job center partner agencies with means of providing high quality services to our customers.

As it is recognized that every program has its limitations, the referral process allows for a customer to participate in multiple programs simultaneously so that their service needs are met without duplication. Direct communication between the job center partner agencies' staff is the preferred method of referral; however, the Job Center Agency Referral form may be used to communicate between the agencies regarding a potential customer who may be eligible for their program.

WIOA staff shall brief their customers on what program and services are available within the Job Center Workforce Delivery System and highly recommend its customers to those services that are outside the purview of WIOA. Appropriate services shall be opened in ASSET to reflect what partner agency received the referral and document that referral in ASSET case notes.

Those customers who go on to participate in the partner program shall have an additional service opened in ASSET to reflect their participation in the partner agency program and document in case notes. Frequent follow-up with the customer and contact with the partner agency staff are required to prevent duplication of services that specifically include any form of payment for such services.

4. WIOA Title I Services Overview

Under Title I, WIOA provides for a continuum of workforce services, depending on the needs of the individual, which include career and training services. Each level of service is addressed with a work-first approach. Individuals participating in WIOA services must receive services based on their individual need.

Services are organized into 2 key levels. Career Services and Training Services are designated as Adult and Dislocated Worker services while services provided under the Youth program are unique and are actually defined as Program Elements. The Youth Program is discussed more thoroughly in Section 8.

Eligibility for services is determined based on meeting WIOA criteria of at least one of WIOA's three primary programs: Adult, Dislocated Worker and Youth. The WIOA Service Chart provides an example of the services available and the need for registration for each level. Section 4, WIOA Title I Services

Overview, reviews the services available under WIOA. It does not address all of the eligibility requirements associated with each program. Eligibility is discussed in Section 6 of this manual.

4.0 WIOA SERVICE CHART

Adult and Dislocated Worker				Youth Program
Career			Training	Program Elements
Registration not Required	Required Registration	Required Registration	Required Registration	Required Registration
Determination of eligibility to receive assistance under Title IB	(These services are considered “Staff-Assisted Individualized Career Services” and are unique in that they will involve more one-on-one staff time compared to the services listed in the column to the left.)	More intensive career services are the second tier in the WIOA continuum of services and are intended to assist those individuals who need services beyond less intensive individualized career services to obtain or retain employment.	Training services are the third tier in the WIOA continuum of services and are intended to assist those who need assistance beyond individualized career services to obtain or retain employment. The need must be established prior to receiving any training service.	The initial services available for registered youth pertain to assessment, case management, and individual service strategy and are called “Design Framework”. By completing Design Framework, youth clients will have a plan that incorporates some or all of the following Program Elements:
Outreach, intake (which may include WPRS referrals) & orientation to the One-Stop center				
Initial assessment of skill levels, aptitudes, abilities & need for supportive services (Xyte)				
Assistance in establishing eligibility for welfare-to-work activities and for other training and education programs	Staff-assisted job search & placement assistance, including career counseling	Comprehensive & specialized assessment, such as diagnostic testing & interviewing	Adult education and literacy activities in combination with training	Tutoring, study skills training, and instruction leading to completion of secondary school or recognized post-secondary credential, including dropout prevention strategies
Information on supportive services and referral to supportive services	Follow-up services, including counseling regarding the workplace	Full development of individual employment plan	Workplace training & cooperative education programs	Education offered concurrently with workforce preparation activities
Internet browsing (job, information and training searches)	Staff-assisted job referrals (such as testing & background checks)	Initial development of employment plan	Entrepreneurial training	Paid and unpaid work experience to include job shadowing, on-the-job training, summer employment opportunities, pre-apprenticeship programs and internships
			Occupational skills training	
Performance info. on the local One-Stop delivery system	Staff-assisted job development (working w/ employer & job seeker)	Short-term pre-vocational services	Private sector training programs	Occupational skills training with priority consideration for training programs that lead to recognized post-secondary credential
			Customized training	
Information regarding filing for Unemployment Insurance	Staff-assisted workshops and job clubs	Individual counseling & career planning	On the job training	Leadership development opportunities
Internet accounts	Initial Assessments	Group counseling	Skill upgrading & retraining	Adult mentoring
Resource room usage		Case management	Job readiness training	Alternative school services
Provide employment statistics information				Follow-up services to help individuals who have completed the program
Performance information on eligible training providers				Supportive services such as transportation and childcare
				Comprehensive guidance and counseling
				Financial Literacy
				Entrepreneurial skills training
				Provide labor market and employment information about in-demand industry sectors or occupations available in the local area
				Activities that help youth prepare for and transition to post-secondary education and training.

4.1 CAREER SERVICES - ADULT AND DISLOCATED WORKER

One of the guiding principles embodied in WIOA is universal access.

Key Definition: Universal Access

Universal access is provided through core employment-related services which are available to any job seeker. WIOA core activities represent the “front end” basic services to the universal population of job seekers through the Southwest Wisconsin Job Center System. Basic career services are primarily informational and are accessible to clients by self-service or limited staff assistance. Basic career services are available to all with no eligibility requirements.

Case managers shall provide career services to clients. The initial assessment should determine the individual’s skill levels, aptitudes and supportive service needs. The job search and placement assistance should help the individual determine whether he or she is unable to obtain employment and thus requires more intensive career services to obtain employment. Documentation of the need for intensive career services must be maintained in the client’s file.

Self-directed basic career services are informational and do not require WIOA registration. Career services are available through the one-stop delivery system and at a minimum include:

- A. Determinations of whether the individuals are eligible to receive assistance under WIOA
- B. Outreach, intake (which may include worker profiling), and orientation to the information and other services available through the job center system;
- C. Initial assessment of skill levels, aptitudes, abilities, and supportive service needs;
- D. Labor exchange services: Job search and placement information, and recruitment and other business services on behalf of employers;
- E. Referrals to and coordination of activities with other programs and services;
- F. Provision of workforce and labor market employment statistics information: job vacancies, skills necessary to obtain jobs, and information relating to local occupations in demand and the earnings and skill requirements for such occupations;
- G. Provision of performance information and program cost information on eligible providers of training services, provided by program, and eligible providers of youth activities, providers of adult education, providers of postsecondary vocational education activities and vocational education activities available to school dropouts under the Carl D. Perkins Vocational and Applied Technology Education Act; and providers of vocational rehabilitation program activities under the Rehabilitation Act of 1973;
- H. Provision of information regarding performance accountability measures for local area;
- I. Provision of accurate information relating to the availability of supportive services, including child care and transportation, available in the local area, and referral to such services, as appropriate;
- J. Provision of information regarding filing claims for unemployment compensation;
- K. Assistance in establishing eligibility for programs of financial aid assistance for training and education programs that are not funded under WIOA.
- L. Programs that are not funded under this Act and are available in the local area; and

Some career services **require WIOA registration**. These career services are considered “staff-assisted individualized career services”.

Key Definition: Registration

Registration is the process for collecting information for supporting a determination of eligibility. This information may be collected through methods that include electronic data transfer, personal interview, or an individual's application. Adults and dislocated workers who receive services funded under WIOA Title I other than self-service or informational activities must be registered and determined eligible. Equal Employment Opportunity (EEO) data must be collected on individuals during the registration process. An individual who is registered is determined eligible for services and is counted against the core indicators of performance for WIOA Title I.

4.2 STAFF ASSISTED INDIVIDUALIZED CAREER SERVICES – ADULT AND DISLOCATED WORKER

When there is significant staff involvement in terms of resources or time, individuals receiving services must be registered for the adult or dislocated worker programs.

For staff-assisted activities, the purpose of the service should be examined to determine if registration is required for the service. Services that are designed to inform and educate individuals about the labor market and their employment strengths, weaknesses, and the range of services appropriate to their situations are informational in nature and therefore are considered career services. Staff-assisted services that are designed to impart job seeking and/or occupational skills will require registration.

For example, individuals receiving the following categories of career services would be registered (a more complete listing of career and staff-assisted career services can be found on ASSET) :

- A. Staff-assisted individualized career services for an individual to obtain or retain employment:
 - i. Comprehensive and specialized assessment of skills
 - ii. Development of Individual Employment Plan (IEP)
 - iii. Individual counseling
 - iv. Career planning
 - v. Short-term prevocational services
 - vi. Work experiences that are linked to careers
 - vii. Workforce preparation activities
 - viii. Financial literacy services
 - ix. Out-of-area job search assistance and relocation assistance
 - x. English language acquisition and integrated education and training programs
- B. Follow-up services, including counseling regarding the workplace for participants for no less than 12 months after entering unsubsidized employment

4.3 ASSESSMENT SERVICES

Clients interested in staff assisted individualized career and training services will be encouraged to complete an individualized assessment of aptitudes, interests and abilities. Assessment may include Xyte, TABE, or other assessment instruments available at the job center or other partner organizations. Previous assessments can be used if it contains current information and is no more than six months old. Case managers will assist the clients in signing up to take the initial assessment(s), and then will interpret and use the assessment information for preparing the IEP. During the application process, participants will also complete the "Career Roadmap".

4.4 PERSONALIZED ASSESSMENT SESSION (GOAL SETTING)

SWWDB uses the Xyte assessment during the assessment process which is a vital case management tool for advising clients. It is a mandatory activity for any client interested in enrolling in training. The personalized assessment session consists of the following components which are conducted in a 1 hour direct one-on-one setting:

- A. Review participant assessment of aptitude, interest, ability, and employability skill levels
- B. Explore career exploration information specific to client's identified interests
- C. Review of current job market and occupations
- D. Provide financial literacy and review personal budget
- E. Identify an occupation/job goal as the initial step in developing a "career road map" toward employment
- F. An occupational goal requiring training must be in a demand occupation area

Case managers are responsible for conducting the personalized assessment session.

4.5 TRANSITION TO TRAINING SERVICES

Training services are available to WIOA participants who cannot find employment leading to self-sufficiency at any time if:

- A. The individual's need for training is based on a comprehensive assessment of work history, skills, education, career, and occupational information;
- B. The case manager determines such services are necessary for the individual to obtain employment that leads to self-sufficiency;
- C. The individual is determined by the WIOA service provider, after completion of assessment, to be in need of training and to have the skills and qualifications to successfully participate;
- D. The individual selects a training program directly linked to a locally identified in-demand industry sector or occupation; and
- E. The individual is unable to obtain other or sufficient grant assistance, including Pell (See section 7.0 Coordination with Other Training Funding);
- F. The participant must apply for financial aid;
- G. Each program has additional criteria regarding eligibility and approval for training. See Section 8 for specific eligibility criteria.

4.6 TRAINING SERVICES

Training services are available to clients who have met certain conditions and who have shown they are unlikely to return to a previous occupation. Training services are provided through Eligible Training Providers.

Allowable training services include:

- A. Occupational skills training
- B. On-the-job training
- C. Incumbent worker training (Not currently used)
- D. Apprenticeship training
- E. Skill upgrading and retraining
- F. Entrepreneurial training
- G. Job readiness training
- H. Transitional jobs training (Not currently used)

- I. Adult education and literacy activities provided in combination with services described above
- J. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

Case managers will refer and assist clients enrolling in approved training programs. Training activity must be consistent with the customer's individual employment plan (IEP). Case managers will also be responsible for monitoring the client's progress in achieving training outcomes and successful completion of the training. Case managers will ensure that required registration processes are complete and documentation properly recorded and filed. Case notes are to be entered into ASSET regarding training start and end dates and training progress.

4.7 RECOGNIZED POSTSECONDARY CREDENTIALS (NEW)

Recognized postsecondary credentials are awarded in recognition of an individual's attainment of measurable technical or industry/occupational specific skills necessary to obtain employment or advance within an industry/occupation. These skills are generally based on standards developed or endorsed by employers or industry associations (degrees, occupational licensure, occupational certificates, etc.).

Examples of what would count:

- A. An industry recognized certificate, or certification (e.g. Microsoft Information Technology certificate, Certified Nursing Assistant, certificate in business administration, Certified Welder)
- B. Certificate of completion of a youth apprenticeship or apprenticeship
- C. License recognized by state or federal government (e.g. Registered Nurse, Asbestos Inspector, Master Plumber, Licensed Professional Counselor)
- D. Technical Diploma
- E. Associates degree
- F. Bachelor degree
- G. Job Corps Certificate of completion for career technical training

Examples of what would not count:

- A. Continuing Education Units (CEUs)
- B. Certificate of completion
- C. Work Readiness certificates
- D. Workforce Development Board awarded certificates
- E. General skill certificates related to safety or hygiene, etc. (e.g. CPR, OSHA, Emergency Management)
- F. Credentials that are not industry recognized or sought by employers in industry (e.g. local college certificates such as Professional Communication, Global Studies, Bi-Lingual Spanish Skills)

4.8 SECONDARY SCHOOL DIPLOMA OR ITS RECOGNIZED EQUIVALENT (NEW)

Secondary school diploma or its recognized equivalent is recognized by the state and is included for accountability under the Elementary and Secondary Education Act of 1965, as amended by Every Student Succeeds Act.

Examples of what would count:

- A. High School Diploma
- B. High School Equivalency Diploma (HSED)
- C. General Education Development (GED)

Examples of what would not count:

- A. Special Education certificate

4.9 SUPPORT SERVICES

Support services are defined as payments for services that are necessary to enable an individual to participate in WIOA activities. SWWDB limits support services to transportation and childcare. Other support services exist and can be offered with prior authorization by SWWDB.

Case managers may authorize the payment of support services for clients provided the individual is (1) participating in WIOA career or training services; and (2) unable to obtain support services through other programs providing such services. The need for WIOA support services must be documented in ASSET and the customer's case file. Case managers are responsible for determining whether the client should receive support service payments in accordance with SWWDB guidelines, authorizing the payment in the SWWDB payment authorization system, and documenting the need for support service payments and efforts to obtain resources from other sources. Supportive service needs after program exit must have prior approval from the Workforce Operations Manager before payments are made. Additionally, case notes are to be entered into ASSET to explain the reason for supportive services need.

4.10 FOLLOW-UP SERVICES

Once a client has obtained employment or when the client does not receive any new services for a 90 day period, the client will be "exited" or have their services closed. The participant's 12-month follow-up period will then begin at the time of exit. Follow-up is done at the first, second, third and fourth quarter marks after exit. It is also mandatory that all supplemental data verification is kept in the clients' file. Youth clients must be offered 12 full months of follow-up services.

Follow-up service goals and strategies are to be set to support job retention and advancement, lifelong learning, and self-sufficiency. Case managers are to provide additional service as needed to assist participants in achieving these goals post-participation. Follow-up is critical to ensure successful, long-term employment and WIOA performance outcomes. The follow-up provided should be based upon customer needs as well as SWWDB goals and objectives. SWWDB requires follow-up contact be provided at least quarterly, and recommends even greater frequency to address on-the-job issues and prevent job loss.

Case managers should review the participant's needs as well as their individual employment plans to determine what follow-up services are needed. If a client should deny follow-up services, it is important to note that at any time during the 12 month period following exit they can request assistance. It is also important to note that those participants who have multiple barriers to employment and limited work histories may be in need of significant follow-up services to ensure long-term success in the labor market.

For those clients who are employed out of state, follow-up contact allows the case manager to gather necessary information to complete ASSET Follow-up status screens. Correctly completing these screens for clients who are employed out of state OR who are self-employed ensures positive outcomes in the WIOA Common Performance Measures. For more information on Common Performance Measures and ASSET data entry requirements, please see this link:

<https://sps.dwd.state.wi.us/wioa/WIOAPerformance/SitePages/Home.aspx>.

All WIOA services (except needs-related payment) that were allowable prior to exit are allowable after exit and can be paid for using WIOA allocated funds with prior approval. WIOA allows service providers and program operators to continue serving participants without forcing them to re-enter the program as active participants. Training and support services provided after entry into unsubsidized employment are limited and require prior authorization from the Workforce Operations Manager.

Loss of contact during the follow-up period is to be documented in the case file (ASSET). Before terminating all contact with a participant during follow-up, intensive strategies must be attempted to establish contact such as home visits (if organization permits), sending registered/return receipt mail, contacting last known employer or school, etc. All attempts should be documented.

4.11 FOLLOW-UP ADULT AND DISLOCATED WORKER

Follow-up is available to Adult and Dislocated Workers for up to 12 months after exit. The following is a sample of services available to clients during this period:

- A. Additional career planning and work search assistance
- B. Employer contact
- C. Information about additional education opportunities
- D. Peer Support Groups
- E. Supportive Services information
- F. Training and supportive services provided after entry into unsubsidized employment are limited and require prior authorization from the Workforce Operations Manager.

4.12 FOLLOW-UP FOR YOUTH CLIENTS

All youth clients must receive some form of follow-up services for a minimum of 12 months after exiting the Youth Program. The types of services provided and the duration of services must be determined based on the need of the participant and completely documented in the case file (ASSET). The following is a sample of services available to clients during this period:

- A. Adult Mentoring
- B. Assistance in securing better paying jobs, career development, and further education
- C. Employer contact
- D. Job clubs
- E. Leadership development opportunities
- F. Supportive Service Activities (Require SWWDB approval for payments)
- G. Tracking progress in employment
- H. Peer Support Groups/Workshops

5. Case Management Responsibilities, Forms, Guidelines and Tools

5.0 CASE MANAGEMENT/CAREER PLANNING POLICY (SWWDB POLICY E-120)**Policy.**

Career planning is a collaborative process designed to assist the individual job seekers in preparing for and obtaining employment that will lead to self-sufficiency. Career planning involves not only the provision of direct services to individuals, but also includes the maintenance of required records and documents, both paper and electronic, compliance with local, state, and federal regulations and guidelines, and interaction with other workforce partners and businesses. Specific definitions and procedures related to career planning are described in the SWWDB WIOA Program Guide.

WIOA case managers shall provide multiple services throughout the entire WIOA process within the following broad elements:

- Orientation
- Intake (Eligibility and Certification)
- Assessment
- Customized Service Planning
- Progress Reporting
- Placement and Exit
- Follow-up

Throughout participation, services associated with the above elements will be defined, communicated and documented through the process of continuous case management. Continuous career planning ensures that customer expectations and needs are addressed on a schedule that is relevant and predictable. Continuous career planning also ensures that service delivery is individualized and active throughout participation. The frequency of contact under continuous career planning is at least monthly. For the purpose of this policy, contact is defined as direct customer interaction conducted and documented to determine WIOA customer status, progress, and current and/or future needs. All contact shall be documented in the Department of Workforce Development's Automated System Support for Employment and Training (ASSET). All participants shall be entered into the Payment Authorization System as it is used as a secondary database for real-time tracking during the exit and follow-up stages of WIOA.

Documenting career planning is vital to quality service. Participants should see the same case manager for check-ins and return visits/appointments until the participant exits the system. The participant should be notified in the event that the case manager changes and offered an opportunity for an introductory meeting with the new case manager as soon as mutually convenient. Case notes and file maintenance are to reflect the results of continuous career planning in detail so that participant status is easily determined. In addition to at least monthly case notes, participant case note history must reflect:

- Introduction: A complete description of the status of the individual at participation including an explanation of their overall need for services. This case note will elaborate on eligibility, intake, and assessment results in order to give a clear picture of the individual, his/her barriers, strengths and skills, training preferences, and possible support service needs.
- Determination of Training Need: Case managers must establish and describe the participant's need for training/retraining.
- Training Begin Date: A case note must be entered when the participant enters training and is to include the date the training began, training program, training provider/school, approximate cost, and planned end date.
- Training End Date: A case note must be entered to reflect that the participant's training has ended and include the following – date training ended, the name of the program, whether the participant completed the training, and credential/license status.
- Service Closure/Exit: A full description of the participant's status at exit must be case noted and include employment/non-employment, employer name, hire date, hours, and wage. Any exclusion must also be described.

Additional information on case notes requirements can be found in the SWWDB WIOA Program Guide. It should be noted that case notes, eligibility and program data, services rendered, and participant's status at exit should have supporting documentation contained within the participant's paper file. Supporting documentation for the above shall be validated for accuracy and completeness prior to exit.

The Chief Executive Officer (CEO) shall ensure that procedures and systems are established and maintained to ensure that continuous career planning is provided to every job seeker client and notes related to career planning sessions are documented in ASSET. The workforce operations manager, under the direction of and in consultation with the CEO, shall be operationally responsible for the provision and documentation of career planning services to WIOA clients.

SWWDB shall require all WIOA service providers and grantees receiving funds from a WIOA grant or contract administered by SWWDB to comply with this policy and applicable procedures. Compliance will be monitored during regular file reviews and annual monitoring. Service provider compliance to this policy will be considered during contract negotiations and renewal.

Reference: Workforce Innovation and Opportunity Act of 2014, Section 101 (8)

Policy Adopted: December 11, 2013

Policy Revised: June 16, 2016

5.1 REGISTRATION AND ELIGIBILITY

Case managers will be responsible for coordination of the client WIOA registration process and for completing and filing all registration documents. Registration is the process for collecting information used to determine eligibility and performance measurement. Additionally, equal employment opportunity data must be collected during the registration process. Individuals who receive services other than self-service or informational activities must be registered and determined eligible in accordance with WIOA. Individuals who visit the Southwest Wisconsin Job Centers and are only seeking information or looking to access self-services and do not request direct individual staff assistance do not need to be registered.

Case managers, prior to enrolling a client in WIOA-funded services, must determine the person's eligibility for WIOA services using the eligibility criteria stated in Section 8. This includes preparing and filing the required eligibility documents and registering the person through the DWD ASSET system.

Case managers are required to case note the client registration and eligibility determination process in ASSET indicating the date when the client was certified as eligible for one of the WIOA programs or shown ineligible and referred to alternate services.

5.2 APPLICANT STATEMENT (SELF-ATTESTATION) PROCEDURE (SWWDB E-120-1) Procedure.

An applicant statement or self-attestation is allowable to verify those items in a client record, that in some cases, are not documentable or may cause undue hardship for individuals to obtain. The Chief Executive Officer (CEO) is responsible to ensure that an applicant statement or self attestation is used in an appropriate manner, and the use of self-proclaimed statement by applicants complies with applicable WIOA regulations and guidance. The CEO hereby designates the SWWDB Workforce Operations Manager as the person responsible for carrying out and administering the procedures and guidance outlined in this document. Every SWWDB staff member, service provider, grantee and staff of a service provider/grantee shall have a responsibility to support and comply with the protocols established by SWWDB administration.

A. General Provisions

- Applicants and WIOA participants are allowed to self-attest to certain eligibility and program elements.
- The Wisconsin Department of Workforce Development publishes three primary eligibility and documentation guides dealing with WIOA Title 1B Programs: Guide to WIOA Eligibility Determination and Documentation, Adult and Dislocated Worker Programs Guide to

Participant Case File Documentation, and the Youth Program Guide to Participant Case File Documentation. Case managers are to review the specifications described in the guides to ensure self-attestation is allowable.

- Case managers are encouraged to gather verifiable documentation, when possible.
- Case managers are to document in case notes that an allowable self-attestation was used to verify a certain eligibility criteria.
- Self-attestation cannot be used to document age, citizenship or eligible non-citizen, veteran status, and selective service registration nor to verify receipt of Temporary Assistance for Needy Families (TANF), Food Stamps or other public assistance.
- Case manager must inform the individual that all information is subject to verification and that false information is grounds for termination from the program.

B. Use of Applicant Statement/Self-Attestation Form

- When using self-proclaimed applicant statement as documentation, the Applicant Statement (Self-Attestation) Form E-120.A or the WIOA Application A1 are to be utilized.
- Each data element that is acknowledged by self-attestation must be documented by a Applicant Statement (Self-Attestation) Form E-120.A if not previously captured on the WIOA Application A1. Only one form is required.
- As warranted by the individual circumstances and if identified as allowable, the individual is to complete the Applicant Statement (Self-Attestation) Form E-120.A. The individual will complete Sections 1 and 3 and certify the attestation by signing in Section 4.
- If the WIOA Application A1 is used to attest to an allowable circumstance, the individual must initial the appropriate boxes and sign in the space provided in the Certifications and Acknowledgements section of the application..
- The case manager will complete Section 2 of the Applicant Statement (Self-Attestation) Form E-120.A describing the need/reason for the self-attestation and indicate agreement and approval of the self-attestation by also signing in Section 4.
- The completed and signed Applicant Statement (Self-Attestation) Form E-120.A and/or WIOA Application A1 shall be filed in the participant case file.

C. Common Uses of Self-Attestation (list is not exhaustive)

An applicant statement or self-attestation may be used to document the following elements when all other options have been exhausted:

- Address: self-attestation is acceptable verification of the applicant's current address if no other documentation is available.
- Family Income: documenting family income via self-attestation is allowable if no other means of verification are available.
- Family Size: self-attestation is acceptable verification that an individual lives independently, or in a household with one or more additional individuals. The applicant is to indicate all family members residing in the same household.
- Individual status: Individuals ordinarily included in the definition of family, but claiming to be no longer dependent, should complete an Applicant Statement/Self-Attestation Form attesting to their individual status. Such statements should be corroborated by the head of household in which that person resides. If possible, the individual should also show the source of his/her support.
- Low/No Income: Self-attestation is allowable as proof of income for individuals who claim little or no income. The individual needs to indicate means of support, e.g. unemployment

compensation, for previous six-month period. Self-attestation is NOT ALLOWED as acceptable verification of Temporary Assistance for Needy Families (TANF), Food Stamps, or other public assistance.

- Employment and education status at participation.
- Individual with a disability.
- Date of Dislocation: self-attestation must include day, month, and year.
- Federal Dislocated Worker Criteria (see Guide to Eligibility Determination and Documentation for appropriate category)
- Youth Status/Barrier:
 1. Homeless/Runaway
 2. Offender
 3. Pregnant/ Parenting
 4. School Dropout
 5. Verification of 6th eligibility criterion
- Exit Exclusions: death, health/medical, family care, incarceration/institutionalization, or military called to active duty.

D. Case Manager Expectation

- Case managers are to approve the use of self-attestation when it is allowable.
- Case managers are to case note the use of self-attestation.
- Case managers are to thoroughly read and, when appropriate, certify applicant statements/self-attestations.
- Case managers shall maintain a copy of the fully executed Applicant Statement (Self-Attestation) Form E-120.A in the client paper file.
- SWWDB will review the use of applicant statements and self-attestations during regular monitoring visits and file reviews for accuracy and appropriateness.

5.3 EMPLOYABILITY PLAN

Every participant will have an Individual Employability Plan (Individual Service Strategy for youth) listing the steps that will be taken to move the participant to sustainable employment. The plan encompasses the results of the comprehensive assessment, services, tasks, and skills that both the participant and case manager have determined necessary and achievable. The Employability Plan is to be updated whenever there is a significant change in services or need, but must be **updated at least annually**.

5.4 VIRTUAL JOB CENTER SERVICES

The SWWDB Virtual Job Center was developed to be an electronic version of the job center resource rooms. Customers can use the Virtual Job Center to obtain information about employment and career opportunities, job center services, training programs, and much more without the need to travel to a job center location. While the Virtual Job Center is a good starting point, eventually, a person will need to talk to and/or see a case manager. The website for SWWDB's Virtual Job Center is <http://www.jobcenter.org>.

5.5 TRAINING PROGRAM APPROVAL

Case managers are responsible for the activities that lead to determination of training as an appropriate activity for an eligible individual, such as the issuance of an Individual Training Account (ITA).

Key Definition: Individual Training Account (ITA)

The Workforce Innovation and Opportunity Act (WIOA) stipulates that with limited exceptions, training services provided to adults and dislocated workers shall be delivered using an Individual Training Account (ITA). An ITA is an account established by WIOA Case Managers on behalf of an eligible client to procure training services. The ITA will be the vehicle that provides training assistance, along with any other funding sources administered by SWWDB. WIOA training services must be provided by training institutions selected from the State-approved list of eligible training providers, per WIOA Section 122 and 29 CFR 680.300, and must be provided through the SWWDB One Stop delivery system.

The use of Individual Training Accounts (ITAs) allows the client an opportunity to choose training from a variety of eligible training providers. The training must be in demand occupations or support driver industries as determined by SWWDB.

SWWDB maintains an approved list of training programs available in the Southwest Wisconsin Workforce Development Area. These programs support local demand occupations and driver industries. Additionally, other programs described on the Statewide List of Eligible Training Providers/Programs are also available to customers as long as the customer's choice supports a local demand occupation or driver industry. Training programs that support either regional or statewide demand occupations/driver industries will also be considered on a case by case basis and would require approval of the Workforce Operations Manager.

<http://www.wisconsinjobcenter.org/ita/presentation/SearchBy.aspx>

Clients may be enrolled only in programs on the approved list. Case managers will verify that the training program selected by the client is on the approved training provider list prior to authorizing enrollment in training. Case managers are to note the authorization for training in the client's case file. Enrollment in an unapproved training program is a disallowed cost subject to reimbursement to SWWDB for training expenses.

5.6 PAYMENT AUTHORIZATION SYSTEM (PAS)

The Payment Authorization System (PAS) is a vouchering system that allows case managers to issue payment vouchers for training and support services. Case managers are responsible for monitoring obligations to ensure funds are adequately and correctly managed. PAS includes the following capabilities:

- A. Planning and Forecasting
- B. Tracking prior skills / experience
- C. Tracking Training general details
- D. Tracking Performance
- E. Obligation / Vouchering
- F. Reporting

PAS is the system used by SWWDB to compliment the State System, ASSET. It does not take the place of ASSET and ASSET reporting/recording requirements, but instead, compliments ASSET capabilities and offers SWWDB and program operators a local management system to record key information on clients that is not readily available on ASSET.

All WIOA enrolled participants are to have a file PAS. When an eligible individual is approved for training, the case manager shall encumber WIOA funds in the SWWDB Payment Authorization System (PAS). Limited follow-up services can be provided to the participant after being placed in unsubsidized employment. PAS will be utilized to obligate program training and support service funds for eligible clients and issue

training/support vouchers. Case managers have authority to approve training requests and obligate funds under PAS provided the client's Xyte assessment and Individual Employability Plan (IEP) support the program choice.

Once a client has exited, placement information is to be entered into PAS. This allows for "real-time" reporting of performance outcomes.

5.7 TRAINING AND SUPPORT SERVICE PAYMENTS (SWWDB POLICY E-420)

Policy.

The SWWDB shall allocate WIOA and other program funds to pay training and support service costs for eligible participants who are involved in Title I career services and/or training activities and who are unable to obtain such payments through other programs. All training and support service payments must be documented and vouchered through the SWWDB Payment Authorization System (PAS) or as described in the WIOA Service Provider Contract(s).

Since WIOA programs are not an entitlement, participant need for training and/or supportive services must be established and documented through the assessment process and indicated on the participant's Individual Employability Plan (IEP) or Individual Service Strategy (ISS). The guidelines and limits listed in this policy apply to WIOA Title I adults, dislocated worker (including Special response and National Emergency Grant), and youth participants. Participants must be determined eligible for and in need of assistance in order to secure employment that leads to self-sufficiency.

Training Services

A program of training services is one or more courses or classes, or a structured regimen, that upon successful completion, leads to (1) a certificate, associate degree, or baccalaureate degree; or (2) the skills or competencies needed for a specific job or jobs, an occupation, occupational group, or generally, for many types of jobs or occupations, as recognized by employers and determined prior to training.

For this expenditure requirement, training services may include:

- Occupational skills training, including training for non-traditional employment;
- On-the-job training;
- Programs that combine workplace training with related instruction, which may include cooperative education programs;
- Training programs operated by the private sector;
- Skill upgrading and retraining;
- Entrepreneurial training;
- Job readiness training: Job readiness training includes services that teach skills needed to be successful in the workplace, rather than skills needed to get into the workplace. For example, job readiness training teaches skills such as office communication, punctuality, and how to conduct oneself with supervisors and co-workers; however, it does not teach skills such as job searching, interviewing, or resume writing;
- Adult education and literacy activities provided in conjunction with one or more of the other training services listed above;
- Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training;
- Services that meet the requirements specified in Title 20 CFR Section 663.300; and/or

- Other services that would be defined as a training expense, but will be identified as “Support of Training” include those that:
 - Are specific to the training the participant is receiving;
 - Are necessary in order to participate in and graduate from the training;
 - Are required for every student in the training;
 - Are benefit to the individual only if they are in the approved training;
 - Are documented in writing by the training provider as required. (Acceptable documentation includes a supply list for the course, an email from the training provider, or any other documentation that verifies the items are required for the course.)
 - Examples include: books, licenses, tools, equipment, safety gear, drug testing, testing fees, certification fees, student association fees, background checks, and uniforms.
- Services that do not meet this criteria include, but are not limited to, groceries, child care, dependent care, transportation, parking, housing, clothing, health care, financial counseling, and needs-related payments.

With the exception of certain types of customized and On-the-Job training, and the alternatives to traditional ITA training programs described in the Alternative Training Programs Policy, only training providers through their training programs listed on the ETP are eligible to receive WIOA funds.

Training Payment Guidelines

- The participant possesses the basic skills needed to complete the selected program or is receiving basic/remedial instruction prior or concurrent to occupational skills training.
- The participant has completed a SWWDB approved career interest assessment and the identified training program aligns with the assessment results.
- Work-based training amounts, including but not limited to, on-the-Job training, customized training, and youth work experience, will be negotiated written agreements based on the type of job and the starting wages paid to the worker and are subject to the lifetime limit.
- Eligible training shall comply with the Wisconsin Department of Workforce Development (DWD) Approved Training Program guidelines and Eligible Training Provider (ETP) list.
- Eligible training shall also meet DWD and SWWDB guidelines for high-wage/high-growth jobs.
- Follow-up Services: Individuals engaged in follow-up services can receive training services if appropriate to the IEP or ISS and if need is established. Payment for post-exit training services during follow-up are rare occurrences and require authorization from the SWWDB Workforce Operations Manager.
- Short-term training which is 18-weeks or less will be capped at \$5,000 per participant.
- Long-term training, which is defined longer than 18-weeks and up to 2-years in duration, shall be eligible for the full \$10,000 payment.
- Training assistance is to be coordinated with other funding sources.

- Training vouchers can only be submitted for payment of “Tuition Only”. Examples of the different names used from one training institution to another include but not limited to tuition, seminar, course, class, session, boot camp, etc...

Supportive Services

Supportive services are participant services that are necessary to enable WIOA eligible individuals, who cannot afford to pay for such services, to participate in authorized WIOA activities. For Youth participants, such activities must correspond to the Fourteen WIOA Elements for Youth Programs.

SWWDB limits supportive service payments as follows:

- Supportive services are only to be provided to clients who:
 - are participating in WIOA individualized career or training services or who are participating in the youth program;
 - unable to obtain the supportive service through themselves, a personal support network or through other programs including community agencies; and
 - demonstrate a need for assistance to enable participation in designated WIOA Title 1 activities as established through assessment.
- The cost of supportive services must demonstrate a direct connection to participation in employment and/or training activities which will build skills needed to succeed and advance in the workplace and will result in employment leading to self-sufficiency.
- Approval of supportive services shall be made on a case-by-case basis only when it is determined that the assistance is necessary and reasonable, and:
 - when need is established and alternate assistance is not available;
 - when need and lack of alternative resources have been documented; and
 - services are necessary for the customer to achieve the goals outlined in the IEP or ISS.
- Case managers shall ensure that determination of need is fair, consistent, and equitable, and that similarly situated participants have access to similar supportive services.
- Case managers shall ensure that support services costs are reasonable and necessary. A cost is reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs.
- Funds designated for supportive services will be reserved at the beginning of the program year. If funds become depleted during the year, SWWDB administration will consider options for making additional supportive service funds available.
- Support service costs shall be limited to a lifetime maximum of \$5,000.00 per participant, and are eligible in the following categories:
 - Support of Training: Any cost associated with and is required by the training institution for a customer to participate in an approved training program. Examples include, but are not limited to fees, books, tools, clothing, equipment, etc...
 - Childcare: Childcare costs are defined as payments made to certified or licensed providers for child care provided to a dependent child or children in the legal custody of the participant.

- Childcare shall only be paid for the time the client is involved in training or other approved program activities.
- Transportation: Transportation costs include gasoline, bus passes, and/or vehicle repairs that enable an individual to travel to and from approved program activities. SWWDB further requires that:
 - Payment for gasoline will be limited to \$0.30 per mile using the most direct route from the participant's home to the place of approved program activities.
 - Payment for vehicle repairs must be limited to essential repairs that result in a safe mode of transportation, that are performed by a certified repair dealer who possesses a Federal Employer Identification Number (FEIN) and based on two (2) written estimates if the repairs exceed \$20.00.
 - **Approval for vehicle repairs must be obtained prior to the repairs being made.**
 - Payment of legal fees, fines, and other costs associated with revocation or suspension of a participant's driver's license is not permitted.
 - SWWDB reserves the right to direct the type of transportation that shall be used when more than one method of transportation is available.
 - Job Related: Job related costs are defined as occupation-specific tools, uniforms, or protective clothing, occupational testing for certification purposes, and commercial driver's license (CDL) related fees required as a condition of employment.
 - Education Related: Application fees paid to determine a participant's eligibility and acceptance at an educational institution and which will allow the clients to obtain information on financial aid awards.
 - Medical Exams/Glasses: Medical exams needed for training or employment, drug testing, fingerprinting, vision exam, eye glasses, or protective eyewear.
 - Wrap-around Services for WIOA Co-Enrolled TAA Participants: TAA participants shown to have no source of needed supportive services can request assistance through the WIOA dislocated workers program.
 - Follow-up Services: Individuals engaged in follow-up services can receive supportive services if appropriate to the Individual Employment Plan or Service Strategy and if need is established. Payment for post-exit supportive services during follow-up are rare occurrences and require authorization from the SWWDB Workforce Operations Manager.
 - Other supportive services include, but are not limited to: testing/certification fees; supplies to complete a program activity; clothing for a job interview, if needed; standard driver's license and vehicle registration fees if needed for program participation or employment; Birth Certificate fee when needed for employment or program participation, and; basic hygiene products to ensure successful participation in a designated program activity.
 - Payment for any of the following is prohibited and WIOA funds cannot be used for these costs:
 - Payment of legal fees, fines, and other costs associated with revocation or suspension of a participant's driver's license.

- Business Capitalization: WIOA funds cannot be used to capitalize a business. For example, the purchasing of tools as a post-employment follow-up service for a participant who is or will become self-employed.
- Medical services and procedures, including transportation to medical appointments.
- Deposits: WIOA funds cannot be used to pay or reimburse for any type of deposits, e.g. rental, lease, etc...
- Costs for services, events, or other expenses that were incurred before participant's WIOA enrollment or without case manager consent.

Authorization Limits

- SWWDB reserves the right to establish a lifetime maximum authorization limit that will effectively cap the total amount of SWWDB funding a participant can receive and to change this limit at any time without prior notice to program operators and/or clients.
- The maximum authorization limits shall apply to all WIOA programs operated by SWWDB and all funds issued to or on behalf of the client.
- The lifetime maximum authorization amount, for all types of training and support services, is \$12,500 per individual.
- The lifetime maximum authorized training limit is \$10,000.
- The lifetime maximum authorized support service limit is \$5,000.
- Sublimit: Short-term training, which is 18-weeks or less, is capped at \$5,000 per participant. For WIOA, payment for remedial and basic skills education including GED/HSED coursework and testing is allowable if it is completed in conjunction with an eligible training program.
- Long-term training, which is defined longer than 18-weeks and up to two (2) years in duration, can be eligible for the full \$10,000 payment.

Training and Support Service Guidelines:

- The full scope of training and support assistance must be clearly defined in the IEP or ISS and authorized by establishing an Individual Training Account (ITA).
- Payments of training and support services will normally be made directly to the vendor providing the services(s). Direct reimbursement to individuals, to compensate the individual for expenses already incurred and/or paid, will not be approved without the written pre-authorization of the Workforce Operations Manager.
- Payment of training and support services will be coordinated with all other available resources and services within the local area. Clients will be referred to other agencies for services as a first priority and prior to using WIOA funds.
- Program operators who encounter a client with a unique or extenuating circumstance related to this policy may apply for a waiver of the authorization limit(s) by presenting written documentation to the Workforce Operations Manager citing the facts of the situation and why the waiver is necessary. SWWDB has sole authority on whether to grant a waiver.
- Obligation of funds for training and supportive services is limited to available funding.

- SWWDB strictly prohibits the reimbursement for any training and/or support expenses that were incurred prior to the customer's enrollment into the WIOA Adult, Dislocated Worker, and Youth programs.

The Board directs the Chief Executive Officer to implement this policy, and to develop and maintain procedures that will guide the expenditure of training and support service payments in a manner that is practical, uniform, and complies with applicable federal and state laws and regulations. The Workforce Operations Manager is operationally responsible for management of training and support service payments in coordination with SWWDB's Finance Department.

Program operators are expected to adhere to the maximum authorization limits set forth in this policy and have a responsibility to explain training and support service payment limitations to clients. Program operators shall be required to obtain and place in the participant's file documentation verifying that the person was unable to obtain services through other programs and that the payment of training and support service costs was necessary to enable an individual to participate in program activities. Program operator compliance with this policy will be reviewed during the annual SWWDB monitoring and will be a factor in SWWDB's evaluation of program operator performance. Any disallowed costs associated with failure of the program operator or its staff to comply with this policy will be the responsibility of the program operator.

5.8 JOB PLACEMENT ACTIVITIES

The primary outcome of WIOA is to help people find jobs at family sustaining wages. Therefore, placement assistance is a fundamentally important aspect of Job Center services and is to remain the primary consideration when determining services for clients. Case managers shall assist clients in obtaining employment through staff assisted job placement activities. Case managers should identify employers, in collaboration with other Job Center partners and/or through the www.jobcenterofwisconsin.com website, with specific job openings and seek to match clients with job openings.

5.9 CUSTOMER SATISFACTION SURVEYS

SWWDB is committed to providing WIOA services to the complete and full satisfaction of all individuals and business customers of the Southwest Wisconsin Job Centers. Customer opinions about the services received shall be actively solicited by SWWDB, with the full cooperation and participation of case managers.

SWWDB utilizes surveys to seek the opinions of participants on their program satisfaction and for contractual performance. These surveys are confidential and should be treated with great care. Case managers are responsible for the mailing of the surveys, but survey results shall be returned to the SWWDB Office in Janesville. The survey tool(s) used to solicit feedback shall be determined by SWWDB in consultation with the program operator but generally include:

- A. Program Satisfaction Surveys – A Program Satisfaction Survey will be completed for ALL active participants who have been enrolled in the WIOA Program for sixty (60) days.
- B. Program Exit Satisfaction Survey – A Program Exit Satisfaction Survey will be completed upon a participant's exit from the WIOA Program.

5.10 CORRECTION OF DEFICIENCIES OR UNACCEPTABLE PERFORMANCE

Program operators are required to report progress toward completing contracted goals in each WIOA funded program area. These reports are due the 20th of the month following the end of each calendar quarter. The quarterly reports will be used to communicate program operator progress to the SWWDB Board and Program Operations Committee. Additionally, grant specific reports may be required on a more frequent basis. A program operator whose actual performance falls below 15% of planned performance will be required to

submit a corrective action plan to the Workforce Operations Manager outlining steps that will be taken to bring performance into acceptable standards.

Additionally, DWD is now providing quarterly performance reports to SWWDB indicating case files that are failing one or more WIOA performance measures. Program operators will be required to address any issues identified as failures within ten (10) business days of notification from SWWDB staff or provide a detailed summary of why the performance failure cannot be corrected.

5.11 QUARTERLY MEETINGS

The Southwest Wisconsin Workforce Development Board holds quarterly meetings to discuss various issues related to case management, monitoring, and performance. These meetings will be scheduled as soon as possible after the quarterly SWWDB Board of Directors meetings and may be moved between the RCJC in Janesville and the SWWDB office in Platteville on a rotating schedule, if needed. WIOA program operators are to be in attendance at all meetings.

5.12 ADDITIONAL RESOURCES, DEFINITIONS AND LINKS

DWD Website (WIOA): <http://dwd.wisconsin.gov/wioa/>

State Technical Admins Memos - http://dwd.wisconsin.gov/det/adminmemos/sort_date.htm

State WIOA Program Guide - http://dwd.wisconsin.gov/wioa/pdf/py15_wioa_title1b_prgm_guidelines_update.pdf

ASSET User Guide - <http://dwd.wisconsin.gov/asset/manual/default.htm>

Virtual job Center - <http://www.jobcenter.org>

Job Center of Wisconsin - <https://jobcenterofwisconsin.com>

WIOA Approved Training Programs (State List) - <http://www.wisconsinjobcenter.org/ITA/presentation/SearchBy.aspx>

DOL/ETA - <http://wdr.doleta.gov/directives/>

Glossary of Frequently Used Acronyms - <http://www.swwdb.org/glossary.htm>

6. File Maintenance

The Southwest Wisconsin Workforce Development Board (SWWDB) through the one-stop job center system is the grant recipient of federal funds for oversight of the Workforce Innovation and Opportunity Act (WIOA) Title I programs. These programs include Youth (In-School and Out-of-School), Adult, and Dislocated Workers. Funds are granted to program operators who have the responsibility for the day-to-day activities and operation of the WIOA programs. Both SWWDB and the selected program operators have an obligation to see that participant files are properly maintained and monitored. Program operators will be required to adhere to Board Policy C-301 Records Maintenance, Retention, and Disposal as directed in the program operator contracts.

6.0 FILE MAINTENANCE REQUIREMENTS

SWWDB, as a recipient of federal WIOA funding, is subject to strict administrative requirements including the preparation and management of required records, including participant records. These requirements apply to program operators under contract with SWWDB.

Program operators shall ensure that case managers prepare and maintain such records as required by federal and state laws. These include but are not limited to financial, employee, statistical, property, and participant records and all supporting documents. All records shall be maintained in a form and manner that is accurate, legible and consistent with the principles of accountability proper accounting and financial management,

accountability practices, established professional standards, and applicable federal and state laws, rules and regulations.

Case managers shall maintain a separate case file for each participant enrolled in WIOA services.

6.1 REQUIRED CASE FILE FORMS AND DOCUMENTS

The WIOA Case File Checklist was developed to assist case managers in the management of participant files. The checklist reflects the contents of a client's case file and includes all of the documents required to be included for each participant receiving WIOA services. It also ensures that client case files are maintained in a consistent, neat, and orderly manner. While some sections on the file checklist will be completed during intake, other sections will be part of an ongoing process, but ultimately all sections will be covered and documented before the client is exited from the program.

Case managers are required to utilize the WIOA checklist in each participant's file to ensure that all required documentation has been completed. This checklist form shall be attached to the inside of each participant's file folder and is used to make sure that all required documentation is in the folder and in ASSET, as needed.

- A. WIOA Application
- B. Eligibility Determination/Program Registration / From ASSET
- C. Disability/Income Verification for Family of One Status
- D. Youth Emancipation Report (Only necessary for Older Youth Participants who still live with their family)
- E. Verification of Layoff for Dislocated Workers
- G. UI Documentation for clients participating in the DW program under Federal Eligibility Criteria 1
- H. Verification of Barrier for Youth participants
- I. Documentation/verification of information used to determine eligibility (for programs and program activities)
- J. Release of Information
- K. WIOA Rights, Responsibilities & Requirements (Case managers must review this form with all participants enrolling in intensive and training services.)
- L. WIOA Grievance Form
- M. Individual Checklist verifying personal information (name, age, social security number, etc.)
- N. Selective Service Registration
- O. Financial Aid Verification – required every year if client is enrolled in training
- P. Employability Plan (currently using the form from ASSET)

Other materials as applicable that support or document participant eligibility or activities:

- A. Contracts for employer-based training (OJT, work experience, etc.)
- B. Job search activity records
- C. Training Assessment
- D. Authorization for Education and Training Expense
- E. Supportive service vouchers
- F. Training attendance records
- G. Child care attendance sheets
- H. Mileage sheets
- I. Credentials

- J. Correspondence from, or pertaining to, the participant
- K. Supplemental Data Verification
- L. Grade transcripts
- M. Applicant Statement (Self-Attestation)

Other required information must be available through the ASSET System and/or the current reporting system:

- A. Enrollment and Exit Service Tracking Screens
- B. Individual Employability Plan (IEP) for Adult and Dislocated Workers
- C. Individual Service Strategy (ISS) for Youth
- D. Comprehensive Assessment and other Assessment information/tests
- E. Case notes documenting contact with the participant and progress in the program
- F. Follow-up Service information

Program operators must realize that when updating information on the ASSET System, the system will automatically edit and update the record (the Comprehensive Assessment, ISS, Youth Skill Attainment, etc.). That means that information originally entered into ASSET will be replaced with the current information you have entered, with the exception of the service tracking screens and case management notes.

6.2 REQUIRED FORMS

The following is an explanation of the various forms and documents that are to be completed and included in the “hard copy” file. The purpose of the forms is to ensure that proper eligibility verification and program compliance/management documentation is obtained and retained as required by DWD and the Workforce Investment Act in general. The Technical Assistance documents below provide more detailed information on required documentation:

- WIOA Interim Guidance dated March 2016
- Guide to WIOA Title 1 Eligibility Determination and Documentation
- Adult and Dislocated Worker Programs Guide to Participant Case File Documentation
- Youth Program Guide to Participant Case File Documentation

WIOA Application

The WIOA Application is a comprehensive document that collects a variety of general information about the participant to determine eligibility for WIOA services, documents the customer's acknowledgement of the receipt of service provisions available through WIOA, determines if the customer would benefit from being referred to other One-Stop partners for other services, and collects family household income data.

Family household income data is taken for a 6-month period prior to enrollment and is doubled to annualize the total family income. It is necessary to verify family size when utilizing family income eligibility. In addition to documentation of family size, additional documentation may be required to establish that the family is living in a single residence.

Individuals with disabilities count as a family for the purposes of income; however, evidence of the disability must be documented in the client file and properly indicated in ASSET.

Please see the “Guide to WIOA Eligibility Determination and Documentation” for a list of acceptable documentation under the WIOA Economic Eligibility Criteria, Pages 19 through 21.

This guide also lists what is considered income for the purposes of WIOA eligibility on pages 33 and 34.

Career Roadmap

This document is used to determine the “fit” of a participant with the “new path” they are taking through retraining. The Career Roadmap, which is prepared during the personalized assessment session, makes sure that the participant has considered all the factors of life that go on during the time they will be out of the job market during retraining. It assesses their learning style, reading, communication, and math skill levels and need for remediation. The behavioral traits are important factors in fitting into a career. The case manager will use the Career Roadmap and local labor market information in determining the appropriateness of investing in retraining for the participant. This form must be signed by the client and the case manager.

Dislocated Worker Verification Form

Clients who are dislocated workers must verify their lay-off date and that they do not have a recall date. Case managers shall document the permanent lay-off status through a lay-off letter from the employer which details this information or by use of the Dislocated Worker Verification form which verifies the clients’ status as certified by a company representative. A copy of the lay-off letter or the authenticated Dislocated Worker Verification form must be received and placed in the client's file prior to extending further services. If the participant is in the adult or older youth program, this form is not needed and the case managers should enter N/A in the “Date Complete” section of the File Checklist. This form or the letter must be signed by a company official in order to be considered official documentation of a permanent layoff status. Additionally, Dislocated Worker clients who are eligible for unemployment or who have exhausted unemployment are to have verification of the UI status/history.

Individual Checklist for WIOA Career Services

An individual who comes to a Job Center seeking informational core services in the Resource Room does not need to register or be determined eligible for WIOA services. However, when they decide that they want to have assisted core services it is important that the case manager begin to record information about the client. The Individual Checklist for WIOA Career Services helps the case manager begin to document and record information about the individual. This information is required to ensure WIOA General Eligibility Requirements are met. The case manager is expected to both record the information requested as well as check the boxes which identify how the information has been verified. The I-9 form can be used to collect some of the required information and should be maintained in the client’s file, but it does NOT take the place of the Individual Checklist. All required documentation is to be filed adjacent to this form. The Individual Checklist for WIOA Career Services form must be signed by the client and case manager.

WIOA Rights, Responsibilities & Requirements Form

Case managers, as part of their orientation with a client, shall explain the rights, responsibilities and requirements associated with participation in a WIOA funded activity. The WIOA Rights, Responsibilities & Requirements form should be used as a guideline for this orientation. The form delineates the rights and responsibilities of the client, explains the obligations and requirements for successful participation in WIOA activities, and outlines the obligations of the case manager. Case managers are responsible for providing information as outlined on the form and the client must read the form and certify that he/she received and understands the information with appropriate check marks or initials. The participant and case manager must sign the document, and the participant must be given a copy of the form, once fully executed, for their files.

Participant Complaint, Grievance and Appeal Procedure Acknowledgement Form

As required by WIOA regulations, SWWDB has a complaint and grievance procedure that clients may use to resolve disputes related to participation in WIOA program activities and operations, and/or decisions made by SWWDB, its program operators and staff. Case managers are expected to advise clients of the complaints/grievance process and have them review the Participant Complaint, Grievance and Appeal

Procedure Acknowledgement form. Each participant must sign this form. They receive a copy of the form for their reference and a copy, signed by the client, is placed in his/her file.

Verification of Disability Form

The Verification of Disability form is used to verify a participant's disability if one exists. The definition of "disability" is contained on the form. The form must be signed by the participant or representative (if a minor) and representative of the agency qualified to verify this information. If the participant does not have a qualifying disability, N/A is to be recorded in the Date Complete section of the File Checklist.

An individual with a disability shall be considered a family of one for eligibility purposes. The applicant's disability must constitute or result in a substantial barrier to employment.

Note: Disability status is only used in determining a family of one for income purposes. If the client is a youth, he/she must still have a barrier.

Acceptable Documentation

- A. Letter from Drug or Alcohol Rehabilitation Agency
- B. Medical records
- C. Physician, Psychiatrist, or Psychologist diagnosis/statement
- D. Rehabilitation evaluation
- E. School records/official statement
- F. Sheltered Workshop certification
- G. Social Security Administration Disability records
- H. Social Service records/referral
- I. Veterans Administration letter/records
- J. Vocational Rehabilitation letter/statement
- K. Worker's Compensation records/statement
- L. Applicant statement
- M. Case notes regarding observable condition

Participant's Permission to Release Records Form

The Participant's Permission to Release Records form gives permission to release records on and information about the client and may be used to allow the case manager to directly correspond with a variety of entities to access documentation which is necessary to complete the participant's file. The participant and case manager shall sign the form. A new form should be completed prior to exit.

Employment Verification General Release Form

Employment Verification General Release form is signed at intake as a way of establishing that this is the participant's income for the prior 6 month period. It also may be used as documentation of earnings gain for follow-up after the client exits the WIOA program. It must be signed by the participant and case manager. A new form should be completed before exit.

Youth Barrier Verification for WIOA Service Form

In-school and Out-of-school youth must verify eligibility for services by demonstrating a barrier to success as noted in Section 9 of this guide. The barriers are also listed on the form. The Youth Barrier Verification for WIOA Service form and the accompanying documentation need to be on file before a young person can receive services under WIOA. The case manager is required to sign this form.

Youth Emancipation Form

The Youth Emancipation is completed for each young person seeking participation and/or enrollment in the WIOA Out-of-School Youth Program. It documents that the client no longer lives in their parents' home and that he/she is living independently. Both the participant and their parents must sign this form. A copy of the parent's current Federal Income Tax return and the one for the previous year must accompany this form as documentation of the youth's emancipation. If this does not apply to the participant, N/A is to be recorded in the Date Complete section of the File Checklist.

Selective Service Verification

Every male citizen between the ages of 18 and 26 years of age is required to register with the Selective Service System (SSS). Section 189(h) of the Workforce Innovation and Opportunity Act (WIOA) and 29 CFR Part 683.225 requires that a determination of Selective Service registration status be made prior to enrollment in WIOA funded activities and services to ensure that clients are in compliance with the registration requirements of the Military Selective Service Act (MSSA). Any male client between the ages of 18 and 26 years of age who cannot show that he registered for the SSS will be denied access to WIOA services UNLESS they can show that non-registration was unintentional.

Transgender clients are to take the appropriate registration requirements of the gender at birth; however, for those who are beyond the age of selective service registration, the clients are to complete and submit the Status Information Letter to the Selective Service System. This letter must explain in detail why the client failed to register for selective service. Questions regarding transgender customers should be forwarded to the workforce operations manager.

Case managers shall verify selective service registration and file a copy of the documentation in the individual's case file. Case managers will also be required to report selective service registration in the ASSET system. ASSET Reporting – To report Selective Service registration go into the ASSET system, then go to the Manage Programs, WIOA Title 1, Title 1 Tab. Report “no” if the client is not registered (Note: if you enter “no” he cannot receive WIOA services until he is in compliance). If the client is a female or a male born prior to January 1, 1960, you report “not required.” Report “yes” if the client is registered and you have a copy of his SSS number or you are assisting him in registering for Selective Service. Enter the SSS number into ASSET for all participants when you enter “yes.” If the client did not register, but provided proof that non-registration was not knowingly or a willful act on his part, you will report “waived.”

WIOA Fund Coordination Worksheet and Financial Aid Verification

Each semester a participant's Federal and State Financial Aid must be verified as WIOA requires benefit coordination with other fund sources (like the Pell Grant). In the event the client does not have or is unable to obtain an official financial aid award letter, the Financial Aid Verification form is to be completed by a financial aid officer at the school where the person is enrolled in training. Participants must demonstrate that they have an unmet need after receiving all grant and scholarship dollars entitled to them.

Students who have their unmet need satisfied through work-study or loan dollars may have their work-study or loan awards reduced to be eligible to receive WIOA funding. Case managers will coordinate WIOA funds with other school financial aid by completing form E.421.A - WIOA Fund Coordination Worksheet.

This form is to be completed for every semester the client is in training and a copy is to be kept in the client file. In the rare instance where FAFSA has been submitted, but the school has not received the information before the onset of classes, documentation that the client has applied for financial aid will be acceptable to reserve training funds; however, the client will still be required to submit the Financial Aid Award Letter/Offer once it is complete.

Some institutions or some short-term training programs are not eligible for Federal Financial Aid. Sometimes, the institution is eligible but a particular course of study is not eligible because it is not enough credits or

weeks in length. Case managers should consider another training program or educational institution if a training program and/or school is not eligible for financial aid. Normally, such designation is a warning sign that the program or school has not attained compulsory performance outcomes or lacks required administrative and accountability systems.

6.3 DOCUMENTING INDIVIDUALIZED CAREER SERVICES

It is recommended that a separate tab be created in the file for documentation related to individualized career services. In this section, case managers must put copies of assessment results such as the Reading and Math scores from the TABE. This section also must contain a printout of the Individual Employment Plan (IEP) from ASSET.

6.4 DOCUMENTING TRAINING SERVICES

It is recommended that a separate tab be created for documentation related to training services. Furthermore, there should be separate sections for the Monthly Attendance Sheets apart from the Training Vouchers. The Training vouchers reflect the Individual Training Account information in the Payment Authorization System (PAS).

6.5 DOCUMENTING SUPPORTIVE SERVICES

Supportive services documentation should also be placed in a separate section. Mileage vouchers shall also be separate from Child Care Vouchers if the participant has both types of vouchers. Additionally, the need for support services is to be documented in ASSET.

6.6 DOCUMENTATION PERTAINING TO EXITS

The “Program Exit Date” must be entered on the file checklist. When client services closed, ASSET will populate this field in Manage Programs automatically and update the Manage Exit screen. Self-service actions taken by the customer will no longer keep the customer’s program file active.

The “Credential Indicated” is a copy of the final transcript or letter from the institution indicating that the participant has completed their course of study.

The “Credential Certificate” is a copy of the diploma or certificate awarded by the institution upon completion of the course of study. It may also include copies of any certification issued by the state or other certifying agency. This is also reported in ASSET/Manage Follow-up/Follow-up credential.

The “ITA services close date” is an ASSET service screen for those clients who received training funds must be completed by answering the ITA placement questions at the end of the Occupational Classroom service.

6.7 EXITING CLIENTS

To ensure a smooth transition to the follow-up period, case managers are to:

- A. Have the clients complete new release forms
- B. Review address, phone, email and other contact information (like Facebook) to ensure access to client after exit.
- C. Review the Occupational Classroom service(s) begin and end dates to ensure they properly represent the true beginning and end dates of the training (example: the first day of the client’s very first class) if the client received training assistance. The dates must be supported by documentation in the case file.
- D. Clients with no open services will be put into a pending exit status for 90 days (ASSET); should the client receive any workforce service, the exit date will be adjusted accordingly.
- E. If the client is exiting to employment, verification of employment is required; SWWDB recommends sending the updated Employment Verification General Release Form out as soon as employment

information is provided. Check stubs are also an acceptable form of proof that the client is employed. As a last resort, a verbal statement from the employer and signed by the case manager is allowed.

6.8 CASE FILES FOR EXITED CLIENTS

One year after exit (follow-up), the client case file should be sent to the Southwest Wisconsin Workforce Development Board headquarters office in Platteville. All files for exited clients will be monitored to ensure that all required documentation is included before the file is placed in storage. Any missing information or documentation will be requested of the case manager at that time. Case files for exited clients should be hand delivered to the Platteville office at the end of each month rather than being shipped or sent by mail.

6.9 FILE MONITORING

SWWDB staff will monitor program operator's participant files and financial records periodically throughout the year as indicated in SWWDB Policy C-510 – Grantee Monitoring.

Monitoring is a process that examines program operator policies, procedures and activities for compliance with WIOA regulations. It is a quality assurance and improvement process to ensure the effective delivery of services and proper documentation of client activities. Monitoring looks at a program operator's best practices and need for technical assistance or corrective action. A random sample of a program operator's participant files will be selected and reviewed for the following items (not inclusive):

- A. All required files are complete and maintained
- B. Client's eligibility is verified and correct documentation is on file
- C. Case manager is remaining in contact with client at least monthly and case notes are complete and relevant
- D. Services are appropriate to the needs of clients
- E. PAS / ASSET comparison
- F. ASSET entries are supported by file documentation (Data Validation)

Program Operators shall also make available case files for monitoring conducted by either the Wisconsin Department of Employment and Training or the Department of Labor.

6.10 FILE RETENTION

All records pertinent to contracts funded by SWWDB including financial records, participant files, and supporting documentation shall be retained in accordance with WIOA regulations. A program operator must retain the following records for three (3) years (plus additional time beyond three years until any applicable litigation, audit findings, or claims have been resolved):

- A. All records pertinent to each participant's enrollment in program funding under the contract, including dates of entry and exit in each activity. The retention period begins on the last day of the participant's enrollment in a program.
- B. All records pertinent to complaints/grievances, appeals, and resolutions. The retention period will begin on the day the complaint/grievance is closed following final settlement of the case.
- C. All records pertinent to participants that have been provided eligibility paperwork and are determined eligible, but not served.
- D. A case manager must also retain records for any applicant determined ineligible, refused registration, or otherwise not served. A program operator shall maintain a file with records of each affected applicant for three (3) years from the date of determining ineligibility/refusal. The records shall indicate the reason for ineligibility/refusal. This information must also be entered in the WIOA Enrollee Logs Referral/No Service section.

6.11 CASE NOTES

Case notes are a vital recorded history of all contact and communication between the customer and the system.

In general, case management notes must provide the following information:

- A. “WHO” are you serving,
- B. “WHY” are you serving them,
- C. “WHAT” you are doing with them,
- D. “WHERE” are these things being done, and
- E. “HOW” are these things being accomplished?

6.12 ASSET REQUIREMENTS FOR CASE NOTES

For local case management notes, the following is required on the State’s ASSET system:

- A. Actual dates of services or communication
- B. Reason services are being provided
- C. Monthly updates of participant status
- D. Appointments – Summary of appointment (must include next scheduled appointment and, if the appointment was missed, reason(s) participant stated for missing the appointment)
- E. Social Security Validation

Career Services

- A. Eligibility determination
- B. Eligibility to work in US
- C. Verification of Selective Service registration
- D. Summary of Services: estimated time enrolled in services
- E. Agency providing the service(s) (if different from Program Operator)
- F. Reasons for continued services(s) if service will continue to next level
- G. Referral information including agency, contact person, and phone number
- H. Dislocated Workers Only – Verification of lay-off plus proof of employer
- I. Youth Only – Design Framework Activities
 - 1) Eligibility determination
 - 2) Summary of Services; estimated time enrolled in services
 - 3) Agency providing services
 - 4) Summary of Comprehensive Assessment and IEP/ISS
 - 5) Testing results
 - 6) If services continue to next level, reasons for continued services
 - 7) Referral information, which includes agency, contact person, and phone number

Training Services

- A. The need for training determined
- B. Training to be provided
- C. Updates to Comprehensive Assessment and IEP, which must include training information
- D. Expected completion date

- E. Credential to be attained at end of training (diploma; certificate; etc.)
- F. Amount of funding expended
- G. Actual cost expended
- H. Referral information, which includes agency, contact person, and phone number

Exit Information

- A. Date of Exit
- B. Result of WIOA program completion (placement, credential, employment information, etc.)
- C. Follow-up
- D. Supplemental UI data that can't be entered in the follow-up screens
- E. Activities, services, or training/support provided during the follow-up period must be documented on the ASSET Manage Follow up Service Screens. (A notation should be made in the case management notes that the participant is now in the 12-month follow-up period.)

(The above list is not all-inclusive; when applicable, ALL activities and communication provided to the participant must be documented on the case management notes.) There should never be more than a 30-day gap in case notes entered in ASSET for any reason.

7. WIOA Coordination with Other Programs, Services, Funding

The services available under the Workforce Innovation and Opportunity Act (WIOA) are not meant to take the place of programs, services and funding offered through other organizations. During the assessment process, case managers are expected to thoroughly review a client's needs and determine if alternative sources of services and funding would be available to the client and, if so, coordinate accordingly with the appropriate organization. Every effort should be made to ensure services are not duplicative. The information in this section is not exhaustive but instead details the common instances of funding and service coordination.

7.0 COORDINATION WITH OTHER TRAINING FUNDING

The Workforce Innovation and Opportunity Act (WIOA) requires the coordination of training costs with other programs and directs that training providers must consider the availability of other grants (i.e. Welfare-to-Work program funds, State-funded training sources, student loans, Federal Pell Grants, etc.) to pay for training costs, so that WIOA funds supplement other sources of training funds. The WIOA statute and subsequent federal and state regulations specifically require that funds not be used to pay for the costs of training when Pell Grant funds or grant assistance from other sources are available to pay those costs.

It shall be the policy of the Southwest Wisconsin Workforce Development Board (SWWDB) to coordinate the use of WIOA and other program funds to pay training costs for eligible participants. SWWDB shall approve and allocate WIOA funds when participants are unable to obtain grant assistance from other sources to pay the costs of their training; or require assistance beyond that available under grant assistance from other sources. SWWDB further directs that program operators and training providers must coordinate the funds available to pay for training to avoid duplicate payment of costs when an individual is eligible for both WIOA and other assistance.

SWWDB will require all WIOA clients eligible for training at approved training institutions must apply for financial aid prior to the start of classes. Clients will be directed to complete the Free Application for Financial Aid (FAFSA) thus ensuring the clients access to all available financial assistance. Clients are also directed to work with the training provider of their choice, as well as other agencies for which they are eligible and who provide training assistance, to identify alternate training funds and to make application to those funds.

SWWDB will allow a WIOA eligible participant to enroll in WIOA-funded training while his/her application for a Pell Grant or other financial assistance is pending as long as the program operator's case manager has made arrangements with the training provider and the WIOA participant regarding allocation of these resources once the funds are subsequently awarded. In such cases, the training provider must reimburse SWWDB the equivalent amount of WIOA funds used to underwrite the training.

The Board directs the executive director to implement this policy, and to develop and maintain procedures that will guide the coordination of training funds in a manner that is practical, uniform and complies with applicable federal and state laws and regulations. The workforce operations manager is operationally responsible for administration of applicable procedures and oversight of program operator compliance activities.

Program operators are expected to comply with this policy and establish organizational processes that will coordinate funds available to pay for training. Program operators shall be required to obtain and place in the participant's file documentation of the efforts to coordinate funding and any applicable award of alternate resources. Program operator compliance with this policy will be reviewed during the SWWDB monitoring and will be a factor in SWWDB's evaluation of the program operator's performance. Any disallowed costs associated with failure of the program operator or its staff to comply with this policy will be the responsibility of the program operator. *[Linked to SWWDB Policy E-421]*

7.1 WIOA / TAA Co-ENROLLMENT

The purpose of TAA and WIOA (including NEG) co-enrollment is to ensure that the resources available through each program are maximized and a comprehensive package of services is made available to each dislocated worker. Dually eligible clients often utilize the training benefits available under TAA as TAA training program options and benefits are not as limited as those under WIOA. Because support services are limited under TAA, WIOA can normally assist in providing services such as Transportation and Childcare Assistance to co-enrolled clients. Additionally, WIOA is also able to offer many intensive services such as assessment, career planning, work search, and follow-up assistance not currently available under TAA. These services are considered "wrap around services".

In limited and rare instances will a client who was previously approved for TAA training assistance be given authorization for training services under WIOA before, during, or after the end of a TAA contract. Any such requests require the review and authorization of the Workforce Operations Manager. Clients requesting such assistance will need to provide a unique and reasonable justification, supported by documentation, for such assistance. Under no circumstances will requests of this type supersede the training needs of clients currently receiving WIOA Training Assistance.

The intent of co-enrollment is not to extend a client's training (i.e. receiving an Associate's degree under TAA and a Bachelor's Degree under WIOA). During the assessment and co-enrollment process, WIOA case managers are to counsel affected clients that such examples are not an option and to briefly review the client's post-training placement plan to judge his/her employability. This will offer some assurance that WIOA services can complement the client's TAA training choice within SWWDB policies and guidelines.

7.2 CONCURRENT ENROLLMENT OF YOUTH IN THE ADULT/DISLOCATED WORKER PROGRAMS

Youth may participate in both the youth and adult/dislocated worker programs concurrently. Eligible youth who are age 18 through 24 may also be eligible for the WIOA adult/dislocated worker programs.

Individuals who meet all eligibility criteria for both programs may receive youth and adult or dislocated worker services concurrently. The determination of whether to concurrently enroll a participant in the youth and adult/dislocated worker programs is made at the local level. Concurrent enrollment requires that the participant is registered in both the adult/dislocated worker and youth programs.

Specific services and associated costs must be tracked back to the program, i.e., youth or adult/dislocated worker. Youth funds may only be spent on allowable youth activities. For example, youth funds may not be used to pay for an Individual Training Account. Concurrent enrollment offers participants and local programs maximum flexibility. For example, local programs can provide a 19 year old out-of-school youth occupational training services under the youth program or training services through an ITA using adult program funds.

The appropriate level and balance of youth and adult/dislocated services should be determined for each individual. Individuals who are concurrently enrolled will be counted in both youth, either older or younger depending on when they were registered in the WIOA youth program, and adult/dislocated worker performance measurements.

8. Adult and Dislocated Worker Program

Individuals are eligible to receive services authorized under WIOA Title I if they meet the following general and locally defined eligibility requirements under each program. Documenting a client's eligibility utilizing the guidance provided by DWD and SWWDB is the responsibility of the individual case manager. All eligibility criteria are to be documented in the client's case file.

Eligibility requirements are to be met and substantiated as described in the DWD Publications:

- [Guide to WIA Eligibility Determination and Documentation](#)
- [Adult and Dislocated Worker Programs Guide to Participant Case File Documentation](#)

8.0 WIOA ADULT PROGRAM

To be eligible for WIOA adult program services, a client must meet the following eligibility requirements:

General Eligibility Requirements

- A. Must be 18 years or older (to be eligible to receive basic career services, adults only need to meet the age requirement)
- B. Eligible to work/U.S. Citizenship: participation in programs and activities financially assisted in whole or in part under WIOA shall be open to citizens and nationals of the U.S., lawfully admitted permanent resident aliens, lawfully admitted refugees and parolees, and other individuals authorized by the Attorney General to work in the United States. Citizenship is not required for WIOA eligibility. A customer may present documentation of either citizen status or legal right to work in the United States.
- C. Registered with the Selective Service: Each male registrant 18 years of age or older born on or after January 1, 1960, must present evidence that he has complied with Section 3 of the Military Selective Service Act.

Locally Defined Eligibility Requirements

- A. Resident of Wisconsin
- B. Reside within the WDA #11 (Grant, Green, Iowa, Lafayette, Richland, and Rock Counties)
- C. Complete pre-assessment activities if needed

Priority of Service

Priority of service shall be provided in accordance with SWWDB Policy "E.030 Priority of Service Under WIOA Title 1 Adult Program" at all times (see page 3 of this program guide for more information).

8.1 WIOA DISLOCATED WORKER PROGRAM

To be eligible for WIOA dislocated worker program services, a client must meet the following eligibility requirements:

General Eligibility Requirements

- A. Must be 18 years or older (to be eligible to receive basic career services, dislocated workers only need to meet the definition of “dislocated worker”)
- B. Eligible to work/U.S. Citizenship: participation in programs and activities financially assisted in whole or in part under WIOA shall be open to citizens and nationals of the U.S., lawfully admitted permanent resident aliens, lawfully admitted refugees and parolees, and other individuals authorized by the Attorney General to work in the United States. Citizenship is not required for WIOA eligibility. A customer may present documentation of either citizen status or legal right to work in the United States.
- C. Registered with the Selective Service: Each male registrant 18 years of age or older born on or after January 1, 1960, must present evidence that he has complied with Section 3 of the Military Selective Service Act.

Federal Dislocated Worker Criteria

Client must meet 1 of the 7 criteria.

- A. **Criteria 1:** Regular Dislocated (not part of a mass layoff/closing)
 - 1) Has been terminated or laid off or has received a notice of termination or layoff, from employment; AND
 - a. Is eligible for or has exhausted entitlement to unemployment compensation, OR
 - b. Has been employed for a duration sufficient to demonstrate attachment (work history of two years for age 22 or older or work history of four years if age 21 or younger) to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer not covered under a state’s Unemployment Insurance law; AND,
 - 2) Is unlikely to return to a previous industry or occupation.
- B. **Criteria 2:** Plant Closure/Substantial Layoff (part of a closing of any size or a layoff affecting 25 or more workers)
 - 1) Has been terminated or laid off or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility or enterprise.
- C. **Criteria 3:** Plant closure/Substantial Layoff (general announcement)
 - 1) Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or for purposes of eligibility to receive career services only, is employed at a facility at which the employer has made a general announcement that such facility will close.

Key Definition: General Announcement

A general announcement is any official announcement of the closing which includes a closing date and is issued in a format such as: a press release, a memorandum from the employer to all employees, a notice posted in the affected facility, notification provided under the provisions of WARN or state law or notification to applicable labor unions or collective bargaining units.

NOTE: WARNs are specific to an employer and may identify a specific date when the worker will be laid off or a two week period in which the layoff may occur. Date of dislocation is subject to data validation. In cases where a specific date is stated in the WARN, a date of dislocation up to one week prior and one week following that date is considered to be valid.

D. Criteria 4: Self-Employed

- 1) Was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters. This includes individuals working as independent contractors or consultants but not technically employees of a firm.

E. Criteria 5: Displaced Homemaker

An individual who has been providing unpaid services to family members in the home and who:

- 1) has been dependent on the income of another family member but is no longer supported by that income; or
- 2) is the dependent spouse of a member of the Armed Forces on active duty and whole family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station, or the service – connected death or disability of the member, and
- 3) is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

Key Definition: Underemployed

Underemployed means a worker is either:

- (1) working full-time and has an earned income, which if annualized, would be equal to or below self-sufficiency; or
- (2) working part-time and seeking full-time work.

- F. **Criteria 6:** Spouse of an Armed Forces Member on active duty who has lost their employment as a direct result of relocation to accommodate a permanent change in duty station of such members; or is the spouse of a member of the Armed Forces on active duty who is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.
- G. **Criteria 7:** An individual who is a separated service member with a discharge other than dishonorable, and has received a notice of separation from the Department of Defense and is unlikely to return to a previous industry or occupation.

Locally Defined Eligibility Requirements

- A. Resident of Wisconsin
- B. Reside within the WDA #11 (Grant, Green, Iowa, Lafayette, Richland, or Rock County)
- C. Complete the pre-assessment activities if needed

Individuals are eligible for the full complement of WIOA services including Career, Supportive, and Training at the time they are notified of layoff. The only time eligibility is restricted for certain services is when the employer has only made a general announcement of facility closure and no individual notices of layoff have been issued. In such a case, eligibility is restricted until 180 days prior to the announced facility closure date.

Dislocated Workers must have documentation of their dislocation status. Documentation for proof of eligibility for program must include a letter, notice, or announcement of layoff and/or plant closing AND verification that the worker's employer of record is the same employer reducing its labor force (which could include pay stub, W4 form, etc.). (Those who have received notice but have not reached their dislocation date are eligible for Career readjustment services but are not eligible for Training Services.)

Dislocated Workers who take new employment can continue to be served until they reach self-sufficiency as defined in Policy E.100 Self-Sufficiency Criteria.

8.2 ELIGIBILITY FOR CAREER SERVICE (ADULT AND DISLOCATED WORKER)

To be eligible to participate in career services an individual must meet the General or Dislocated Worker Eligibility Requirements.

The participant's case file must contain a determination of need for career service as identified by initial assessment or the individual's inability to obtain employment through the core services provided.

The Priority of Service Policy Under WIOA Title I Adult Program is utilized to establish precedence for Adult Program customers seeking and eligible for individualized career services.

An Individual Employment Plan must be developed for any participant that has received an assessment or is participating in career services.

Key Definition: Individual Employment Plan

The Individual Employment Plan is an ongoing strategy jointly developed by the participant and the case manager that identifies the participant's employment goals, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goals.

8.3 ELIGIBILITY FOR TRAINING SERVICES

Individuals eligible for training services are adults and dislocated workers who:

- A. Have received at least one career service, such as development of an individual employment plan with a case manager or individual counseling and career planning, before the individual may receive training services. The individual's case file must contain a **determination of need for training services** under Sec. 680.220, as identified in the individual employment plan, comprehensive assessment, or through any other intensive service received and;
- B. Are unable to obtain grant assistance from other sources to pay the costs of training, including sources such as Federal Pell Grants, Trade Adjustment Assistance, etc. or require WIOA assistance in addition to other sources of assistance (e.g. Pell Grants) (Clients are to apply for financial aid which will determine the level aid they are eligible for through the training provider) and;
- C. Are entering a training program listed on the SWWDB Approved Program list. Programs that are on the state-wide ITA list but are not on SWWDB's list can be considered for approval IF they support a

driver industry or demand occupation in the area AND if the program is not on the SWWDB list of removed programs.

- D. Are determined to be eligible in accordance with the priority system.

To access training services in the **Dislocated Worker Program**, the individual must show he/she is unlikely to return to a previous industry or occupation. WIOA requires local areas to define “unlikely to return to a previous industry or occupation”. This definition is integral when determining whether or not a dislocated worker is eligible for training services.

Key Definition: Unlikely to Return to a Previous Industry or Occupation

An individual is deemed unlikely to return to her/his previous industry or occupation when:

- the individual lacks the necessary skills due to technological or other changes in the occupation; or
- the individual cannot return to her/his previous industry or occupation because she/he has physical or mental disabilities which prevent her/him from returning to her/his previous industry or occupational area; or
- the individual has exhausted her/his unemployment compensation benefits and has been unable to find a job in her/his previous industry or occupation; or
- the individual has been long term unemployed (12 Weeks of the Last 20 months) and has been unable to find a job in her/his previous industry or occupation; or
- the individual has been assessed by a WIOA service provider as being unable to find employment in her/his previous industry or occupation or to find employment at a compensation level comparable to her/his previous occupation; or
- a WIOA service provider has determined that the individual needs additional assistance in order to retain employment.

There is no federal requirement or DWD determination for the minimum time period an individual must be in individualized career services before they are eligible for training services.

9. WIOA Youth Program

The overall purpose of the WIOA Youth program is to:

- A. Provide, to eligible youth seeking assistance in achieving academic and employment success, effective and comprehensive activities, which include a variety of options for improving educational and skill competencies and provide effective connections to employers;
- B. Ensure ongoing mentoring opportunities, in the workplace and the community, for eligible youth with adults committed to providing such opportunities;
- C. Provide opportunities for training to eligible youth;
- D. Provide continued supportive services for eligible youth;
- E. Provide incentives for recognition and achievement to eligible youth; and
- F. Provide opportunities for eligible youth to participate in activities related to leadership, development, decision making, citizenship, and community service.

The majority of youth participants are to be involved in year-round activities. The intensity of services may fluctuate during the year depending on other activities, such as school. However, the general program design and individual service strategies are to be based on comprehensive, year-round services.

9.0 YOUTH DEFINITIONS

Activities to Help Youth Transition to Post-Secondary Education and Training: Activities could include skill development and practice (time management, practice interviews, independent living, and legal responsibilities after age 18) and how to prepare for post-secondary education (applications, financial aid, scholarships).

Alternative Education/School: An instructional program approved by the school board, that utilizes successful alternative or adaptive school structures and teaching techniques and that is incorporated into existing, traditional classrooms or regularly scheduled curricular programs that is offered in place of regularly scheduled curricular programs.

Application: The process to gather information to determine eligibility and register a youth as a participant.

Attending School: School status is based on the youth's status at the time of WIOA program enrollment. If the youth is between grades within high school and enrolled in WIOA during the summer months, they would be an ISY as long as they are still enrolled in school and will be returning to high school.

For youth who have graduated from high school, and are either enrolled/registered or simply planning to attend college, status is still determined at the time of enrollment. A youth participant under these circumstances would be considered an OSY. However, if school has started and the youth is attending school, they would be considered in-school. In addition, 22 to 24 year olds attending post-secondary school would never be considered ISY since ISY must only be ages 14 – 21.

Basic Skills Deficient: A youth who has English reading, writing, or computing skills at or below the 8th grade (8.9 or lower) level on a generally accepted standardized test.

Compulsory School Attendance: The youth is at an age where they are required to attend school, do not have an exception to the regular school attendance as outlined in Wis. Stat. sec 118.15(3) (16 to 18 years old), or have not graduated.

Disabled Youth: A youth who meets the following American with Disability Act of 1990 definition.

Disability: The term "disability" means, with respect to an individual:

- A. A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- B. A record of such an impairment; or
- C. Being regarded as having such an impairment

Dropout: An individual who has dropped out of high school and not completed his/her high school diploma or equivalent. The term "school dropout" does not include individuals who have dropped out of postsecondary education. This may include, but is not limited to, youth who have been expelled and transient youth who are not enrolled. A youth's dropout status is determined at registration. Case managers are to document in the case file the reason the youth has been determined to be a dropout.

Education offered concurrently with and in same context as workforce preparation: The three components of an integrated education and training program include: adult education and literacy activities, workforce preparation activities, and workforce training. Adult education and literacy activities are programs, activities, and services such as English language services to achieve competence in reading, writing, speaking, and comprehension. Workforce preparation activities help individuals acquire a combination of basic academic, critical thinking, and digital literacy skills. They improve employability by improving self-management

abilities, increasing ability to work with others, and developing other skills necessary for the successful transition into post-secondary education, training, and employment.

English Language Learner: An individual who has limited ability in reading, writing, speaking, or comprehending the English language, and whose native language is a language other than English; or who lives in a family or community environment where a language other than English is the dominant language.

Entrepreneurial skills training: Training to provide the basics of starting and operating a small business.

Exit: When a participant leaves the program. A participant who has an inactivation or termination date within the quarter or who does not receive any WIOA Title I or III funded services for 90 days and is not scheduled for future services except follow-up services has exited the program.

Family: Means two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:

- A. A husband, wife, and dependent children.
- B. A parent or guardian and dependent children.
- C. A husband and wife.

Financial Literacy: Engaged in training to improve financial literacy or personal budgeting skills.

High Poverty Area: A youth living in a high poverty area automatically meets the low-income criterion. A high poverty area is a Census tract, a set of contiguous Census tract, Indian Reservation, tribal land, Native Alaskan Village or county that has a poverty rate of at least 25 percent, as set every five years using American Community Survey 5-Year data. Note: Currently, the only county in Wisconsin that meets the 25% poverty rate is Menomonie, so all youth residing in this county seeking to participate in the WIOA youth program will automatically be considered low income. However, there are likely some census tracts in Wisconsin which meet the 25% poverty rate. If the WDB wishes to use this as a low-income criterion, they must use the American Community Survey 5-year data to determine if any census tracts in the local area are above the 25% poverty rate.

Homeless Youth: An individual who:

- A. Lacks a fixed, regular, or adequate nighttime residence; or
- B. Has a primary nighttime residence that is:
 - 1) Sharing housing of other persons due to loss of housing, economic hardship, or similar;
 - 2) Living in a motel, hotel, trailer park, or campground due to lack of alternative adequate accommodations;
 - 3) public or private operated shelter for temporary accommodation;
 - 4) an institution providing temporary residence for individuals intended to be institutionalized; or
 - 5) a public or private place not designated for or ordinarily used as a regular sleeping accommodation for human beings.

In-School-Youth (ISY): an applicant is considered to be an in-school-youth (ISY) if they are between 14 and 21 and enrolled and/or attending any school, and are considered low-income, and possess one or more of the pre-determined barriers.

Low Income: An individual who:

- A. Receives, or in the past six months has received, or is a member of a family that is receiving or in the past six months has received, cash payments under a Federal, State, or local income-based

- public assistance program, such as W-2 employment positions, Kinship Care, SSI, Refugee Cash Assistance, Emergency Assistance or other federal, state or local means tested program;
- B. Receiving or eligible to receive a free or reduced price school lunch;
 - C. Received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program, that in relation to family size does not exceed the higher of:
 - 1) the poverty line, for an equivalent period, or
 - 2) 70% of the lower living standard income level, for an equivalent period.
 - D. Qualifies as a homeless individual;
 - E. Is a foster child on behalf of whom state or local government payments are made; or
 - F. Is an individual with a disability whose own income meets the income requirements above but who is a member of a family whose income does not meet those requirements

Migratory Child: A child who is, or whose parent or spouse is a migratory agricultural worker, including a migratory dairy worker, or a migratory fisher, and who, in the preceding 36 months, in order to obtain, or accompany such parent or spouse, in order to obtain, temporary or seasonal employment in agricultural or fishing work – has moved from one school district to another or resides in a school district of more than 15,000 square miles, and migrates a distance of 20 miles or more to a temporary residence to engage in a fishing activity.

Offender: An individual, adult or juvenile, who is or has been subject to any stage of the criminal justice process, for whom services under WIOA may be beneficial; or who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

Out-of-Home Placement: Foster care, including family foster care, kinship care, treatment foster care, and residential and group care.

Out-of-School Youth (OSY): An applicant is considered to be an out-of-school youth (OSY) if the eligible youth is not younger than 16 and not older than 24 years; not attending any school (other than under WIOA Title II); and possesses one or more of the pre-determined barriers.

Participant: A youth who has been registered into the youth program and who is receiving services other than follow-up services. Participation commences on the first day, following determination of eligibility, on which the youth begins receiving WIOA Title IB youth services beyond Design Framework.

Pregnant or Parenting Youth: An individual who is under 25 years of age and who is pregnant, or a youth, male or female, who is providing custodial care for one or more dependents under age 18.

Requires Additional Assistance (ISY): A youth in need of additional assistance who possesses at least one of the following characteristics:

- A. One or more grade levels behind
- B. Suspended from school in the past three months
- C. Has a diploma but is in need of additional education or training
- D. Has not held a full-time job (30 hours or more) for more than six consecutive months
- E. Poor work history, to include no work history
- F. Fired from a job in the last six calendar months
- G. Lacks work readiness skills necessary to obtain and retain employment
- H. Being raised by someone other than biological parent

- I. Child of a parent offender
- J. Youth at-risk of court involvement
- K. Gang affiliation
- L. Refugee/immigrant
- M. Substance abuse, current or past
- N. Family history of chronic unemployment
- O. Resides in an area of high unemployment or crime
- P. Victim/witness of domestic violence or other abuse
- Q. Child of a veteran

Requires Additional Assistance (OSY): A youth in need of additional assistance who possesses at least one of the following characteristics:

- A. Lacks high school diploma
- B. Post-secondary educational program drop-out during the past 12 months
- C. Has a diploma but is in need of additional education or training
- D. Has not held a full-time job (30 hours or more) for more than six consecutive months
- E. Poor work history, to include no work history
- F. Fired from a job in the last six calendar months
- G. Lacks work readiness skills necessary to obtain and retain employment
- H. Being raised by someone other than biological parent
- I. Child of a parent offender
- J. Lacks occupational and/or educational goals/skills
- K. Expulsion from school
- L. Youth at-risk of court involvement
- M. Gang affiliation
- N. Refugee/immigrant
- O. Substance abuse, current or past
- P. Family history of chronic unemployment
- Q. Resides in an area of high unemployment or crime
- R. Victim/witness of domestic violence or other abuse
- S. First generation high school graduate

Self-Certification: An individual's signed attestation that the information he/she submits to demonstrate eligibility for a WIOA Title I-B program is true and accurate.

Services that Provide Labor Market and Employment Information: Include career awareness, career counseling, career exploration services or in-demand industry sectors or occupations available in local area.

9.1 YOUTH APPLICATION

All youth customers are to complete an application which collects basic applicant information. This form is the same form used for all Title I programs. The information gathered during the application process includes all of the information necessary to determine eligibility and complete registration.

9.2 YOUTH ELIGIBILITY

To be eligible for WIOA youth program services, a client must meet the following eligibility requirements:

General Eligibility

Youth are eligible to receive **Out-of-School Youth** WIOA Title I-B services if they are:

- A. Not less than 16 years old and not more than 24 years old; and
- B. Not attending any school (as defined under State law); and
- C. Possess one or more of the following characteristics:
 - 1) A school dropout;
 - 2) Within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter;
 - 3) A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is: basic skills deficient or an English language learner;
 - 4) An offender;
 - 5) A homeless individual aged 16 to 24 who meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), a homeless child or youth aged 16 to 24 who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)) or a runaway;
 - 6) An individual in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
 - 7) An individual who is pregnant or parenting;
 - 8) An individual with a disability;
 - 9) A low income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. (See definition in section 9.0)

Youth are eligible to receive **In-School Youth** WIOA Title I-B services if they are:

- A. Attending any school (as defined by State law);
- B. Not younger than age 14 or (unless an individual with a disability who is attending school under state law) older than age 21 at the time of enrollment;
- C. A low-income individual; and
- D. An individual who possesses one or more of the following:
 - 1) Basic skills deficient;
 - 2) An English language learner;
 - 3) An offender;
 - 4) A homeless individual aged 16 to 24 who meets the criteria defined in sec. 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), a homeless child or youth aged 14 to 21 who meets the criteria defined in sec. 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)) or a runaway;
 - 5) An individual in foster care or has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for

assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;

- 6) An individual who is pregnant or parenting;
- 7) An individual with a disability; or
- 8) An individual who requires additional assistance to complete an educational program or to secure or hold employment. (See definition in section 9.0)

When determining income level, do not count income received from unemployment insurance, child support payments, federal, state, or local public assistance programs, or Old Age or Survivors Social Security benefits.

An individual with a disability shall be considered a family of one for income eligibility purposes. The applicant's disability must constitute or result in a substantial barrier to employment as listed above.

Disability status alone does not constitute a barrier and is only used in determining a family of one for income purposes. The youth must still have a barrier. Disability status is to be documented in client records.

Local Eligibility

- A. Must be a resident of Wisconsin.
- B. Must reside within the WDA #11 (Grant, Green, Iowa, Lafayette, Richland, and Rock Counties).
 - 1) Those entering the Older Youth Program may need to complete pre-assessment activities

5% Exception:

Of the youth with low income as a condition of eligibility (all In-School Youth and Out-of-School youth with a high school diploma or requires additional assistance), no more than 5% may be eligible if they meet the additional characteristic eligibility but do not meet the income eligibility.

Out-of-School Youth Priority

For any program year, not less than 75% of WIOA Title I-B youth program funds must be spent on OSY.

See Section 9.10 for more information on the out-of-school youth program.

Non-graduated 17-year olds

Legally, a 17-year-old student cannot drop out of school. They must attend a secondary school until they are 18 years of age. In cases where the applicant is 17 years of age and has dropped out, the WIOA Youth Case Manager must work with the student and school system to either arrange a return to school or enrollment at an alternative school.

Graduated 17 year olds

Cannot be served by the ISY operator because they have graduated; therefore, youth would be considered an out-of-school youth. Locally, performance would count as an out-of-school youth contracted number BUT by state definition performance would count toward the younger youth program goals, therefore:

- **Out-of-school youth, who are 17 or 18, must have at least 2 skill attainments a year (1 short-term, 1 long-term). One of the attainments must be achieved within the year AND if the youth is basic skill deficient, 1 of the attainments must be to improve their basic skills.**

Young Adults Ages 22 – 24

Under WIOA, young adults who are between the ages of 22 and 24 and are attending postsecondary education prior to enrollment, are not eligible for the youth program and must be referred to the adult program.

9.3 YOUTH REGISTRATION

All eligible youth who will participate in WIOA youth program activities must be registered prior to participation. Registration is the process of collecting information to support a determination of eligibility. In addition to information required to determine eligibility the following information must also be collected to complete registration.

A. Equal Employment Opportunity Data which includes:

- 1) Race
- 2) Ethnicity
- 3) Gender
- 4) Date of Birth
- 5) Disability

B. Other Information

- 1) Name, Including First, Last, and Middle Initial
- 2) Social Security Number
- 3) Address
- 4) School Status
- 5) Veteran Status (Older Youth Only)
- 6) Labor Force Status
- 7) Date of Registration

C. Selective Service Registration

Case managers are to determine whether the participant is required to register for the selective service, and whether the requirement has been met. Registration for selective service can be done on-line at <http://www.sss.gov>. Male youth who will be reaching their 18 birthday while enrolled in the WIOA program will need to be tracked to ensure Selective Service Registration is complete within 30 days of their 18th birthday.

D. Citizenship – Eligible to Work Status

Participation in youth programs and activities is open to citizens and nationals of the United States, lawfully admitted permanent resident aliens, lawfully admitted refugees and parolees, and other individuals authorized by the Attorney General to work in the U.S.

9.4 YOUTH ELIGIBILITY DOCUMENTATION

Eligibility information for youth program services must be verified. Documentation requirements may be established at the local level. Self-certification for youth aged 18- 24 is acceptable. **For youth 14 through 17**, a parent or legal guardian may certify eligibility information of the minor. Self-certification means an individual's signed attestation that the information he/she submits to demonstrate eligibility for a program under Title I of WIOA is true and accurate.

9.5 INFORMATION AND REFERRAL

- A. **Eligible Youth:** Eligible youth are to be provided with information on the full array of appropriate services that are available through SWWDB, other eligible providers or one-stop partners. Referrals to appropriate training and educational programs that have the capacity to serve the participant or applicant either on a sequential or concurrent basis are also to be provided.
- B. **Ineligible Youth:** Youth applicants who do not meet the enrollment requirements of the youth program or who cannot be served by the program must be referred for further assessment, as necessary, and referred to appropriate training and educational programs that have the capacity to serve the individual.

9.6 ASSESSMENT

Assessment is the first step in determining the needs of participants and establishing goals and service strategies. All youth who are registered into the youth program must be assessed. This process must objectively assess each participant's:

- A. Academic Skill Level
- B. Occupational Skill Level
- C. Service Needs

The assessment must also include a review of the participant's:

- A. Basic Skills – Including but not limited to: reading, writing, computing, speaking and listening.
- B. Occupational Skills – Primary and secondary job specific skills.
- C. Prior Work Experience – Includes paid and unpaid, including volunteer activities.
- D. Employability – Level of readiness to obtain and retain employment.
- E. Interests – Include interest in non-traditional jobs.
- F. Aptitudes – Natural abilities. Include aptitude for non-traditional jobs.
- G. Supportive Service Needs – Determine what supports the youth needs to successfully participate in the activities included in the service strategy.
- H. Developmental Needs – These will relate not only to work maturity skills, but also personal maturity and will be addressed by leadership activities in the ISS.

A new assessment is not required if the provider of youth activities determines it is appropriate to use a current assessment completed for another education or training program. (Assessment cannot be more than six months prior to enrollment.)

Some performance goals will be measured based on pre and post assessment results. The use of assessment procedures such as standardized tests or performance-based assessments with a standardized scoring method is strongly encouraged. To adequately gather skill levels and youth service needs, more than one assessment tool may be needed, (e.g., one tool may be used to measure math and reading skills while another tool will measure interests, aptitudes or occupational skills).

TABE (Test of Adult Basic Education)

SWWDB requires all youth to be assessed through the TABE within 30 days of the first youth service beyond Design Framework (pre-test). Additionally and at a minimum, all youth clients are to be post-tested before exiting the program. All TABE test scores are to be recorded in ASSET under "Manage Assessments".

Out-of-School youth who test basic skills deficient (below a 9th grade level) in math or reading MUST be post-tested within one year of their first youth service and every year thereafter until reaching proficiency. All

TABE testing results for basic-skills deficient youth must be recorded in ASSET under the Management Assessments in the following sections:

- A. Test Scores - Occupational / Educational
- B. Test Scores - Education Functional Level (EFL) Test Scores

9.7 INDIVIDUAL SERVICE STRATEGY (ISS)

All youth who are registered in the youth program must have an Individual Service Strategy (ISS). Service providers are to use the ISS tool in ASSET to maintain consistency across service providers.

Key Definition: Individual Service Strategy

The ISS is to be a working tool that serves as a roadmap to attaining the goals identified through the assessment process. It is to outline a logical sequence of activities and services that will assist the youth to achieve the goals. It describes the services and activities that will be provided as well as the expectation for participation.

It must include the following:

- A. An age-appropriate career goal based on the information gathered during the assessment process. Consideration should be given to nontraditional occupations
- B. Achievement objectives including skill attainment goals (see Section 9.8 Skill Attainment Goals)
- C. Services to be provided, including who will provide the service, location, service times and expected completion dates
- D. Authorization to Release Information

The youth program case manager, participant and their parents/legal guardians (for younger youth) must be involved in the development of the ISS. To enhance youth participant choice, youth should be involved in the selection of educational and training activities.

The ISS may also include non-WIOA funded services that are part of the strategy to address needs and achieve goals.

The ISS is to be maintained as a current tool. It must be updated at least annually but should be updated whenever activities change, goals are attained, or additional service needs are identified.

9.8 SKILL ATTAINMENT GOALS

Skill attainment goals must be based on the assessment and include basic skills, work readiness skills or occupation skills. A maximum of three skill attainment goals per year may be set for younger youth performance purposes, however, additional goals may be set as appropriate. A target date for accomplishing each skill attainment goal must be set for no later than one year from the date the goal is set. These goals must be included in the ISS. Skill attainment goals should be goals that will challenge the youth but are attainable. Progress toward these goals should be continuously assessed. Once a goal has been met, a subsequent goal should be set.

- A. Basic skill goals are to reflect a measurable increase in basic education skills, including reading, math computation, comprehension, writing, speaking, listening, problem-solving, reasoning, & the capacity to use these skills
- B. Occupational skill goal encompasses the proficiency to perform actual tasks, & technical functions required by certain occupational fields at entry, intermediate or advanced levels.

Secondary occupational skills entail familiarity with & use of set-up procedures, safety measures, work-related terminology, record keeping & paperwork formats, tools, equipment & materials, & breakdown & clean-up routines

C. Work readiness skills include:

- 1) World of work awareness
- 2) Labor market knowledge
- 3) Occupational information
- 4) Values clarification
- 5) Personal understanding
- 6) Career planning
- 7) Decision making
- 8) Job search techniques
- 9) Daily living skills
- 10) Positive work habits
- 11) Attitude
- 12) Behaviors
- 13) Neat appearance
- 14) Regular attendance
- 15) Getting along with others
- 16) Reliability
- 17) Motivation
- 18) Survival/daily living skills such as:
 - b. Using phone
 - c. Telling time
 - d. Shopping
 - e. Renting an Apartment
 - f. Opening a bank account
 - g. Using public transportation

D. Short-term goal are a series of incremental, interim, measurable milestones usually attained in less than one year

E. Long-term goals are set around educational or occupational attainment, or training. They are exit oriented in that they address desirable outcomes that set criteria for deciding when the participant needs no additional services other than follow-up.

The ISS must include, at a minimum, one skill attainment goal per year. Youth who have been determined to be basic skill deficient must have at least one basic skills deficient goal identified in their ISS.

9.9 PROGRAM ELEMENTS

WIOA Title I-B youth program must include all of the following program elements. The youth's assessment and ISS will determine which program elements will be provided to individual youth participants. In some cases the service will be provided through a provider other than the WIOA Title I-B provider. In those

instances referral systems and coordination strategies must be in place to ensure the needs of the youth are efficiently met.

PE1: Tutoring, Study Skills Training, Instruction Leading to Completion of Secondary School, Including Dropout Prevention Strategies

Includes summer education activities and summer academic activities to attain basic skills or achieve higher standards. Includes after-school activities either at the school or another community based setting, which are designed to assist youth with academic achievement and stress the importance of staying in school. Dropout prevention strategies may include, but are not limited to, pregnancy prevention activities and drug and violence prevention activities. Education programs supported with WIOA funds must be consistent with applicable state and local educational standards.

PE2: Alternative Secondary School Services

Includes services provided at alternative secondary school sites. This program element may also include activities for which a youth can earn high school credit. Education programs supported with WIOA funds must be consistent with applicable state and local educational standards.

PE 3: Paid and Unpaid Work Experiences

Includes summer employment and other employment offered throughout the school year, internships, job shadowing, pre-apprenticeship programs and On-the-Job Training to provide youth with an opportunity to develop work place skills. Prior to starting any work experience, it is required for all participants to complete pre-work experience training to include work readiness and financial literacy/budgeting training. WIOA has expanded its focus on work experiences and requires **at least 20 percent** of non-administrative local area funds be spent on work experience activities. Work-based learning may also be included in this program element. WIOA funds may be used to pay wages and related benefits for work experiences in the public, private, for-profit, or nonprofit sectors when the objective assessment and the ISS indicate that work experiences are appropriate.

Work experiences are planned, structured learning experiences that take place in a workplace for a limited period of time. Work experiences must in academic and occupational education. The educational component may occur concurrently or sequentially with the work experience. The standard term for a work experience is 260 hours; however, based on client's needs and goals, terms maybe longer or shorter in duration.

- A. May be paid or unpaid. WIOA funds can be used to pay wages and related benefits for work experiences in the public, private, for-profit, or nonprofit sectors. Paid work experience must meet wage requirements designated at **\$9.00 per hour**.
- B. Are designed to enable youth to gain exposure to the working world and its requirements.
- C. Are to help youth acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. The purpose is to provide the youth with the opportunities for career exploration and skill development. Work experience also provides youth with exposure to various work environments and should assist the youth in their career development.
- D. May be subsidized or unsubsidized and may include the following elements which provide an opportunity for youth to learn and practice skills needed to succeed in the workplace:
 - 1) Instruction in employability skills or generic workplace skills such as those identified by the USDOL Secretary's Commission on Achieving Necessary Skills (SCANS);
 - 2) Exposure to various aspects of an industry
 - 3) Progressively more complex tasks
 - 4) Internships and job shadowing

- 5) Integration of basic academic skills into work activities
- 6) Supported work, work adjustment, and other transition activities
- 7) Entrepreneurships
- 8) Service learning
- 9) Paid and unpaid community service; and
- 10) Other elements designed to achieve the purpose of work experience.

On-the-Job Training (OJT) is an allowable work experience activity for youth. However, the appropriateness of this activity is to be authorized by the Workforce Operations Manager. Requirements for OJTs for youth are the same as the requirements for OJTs for adults.

NOTE: OJT contracts must not be entered into with employers who have received payments under previous contacts and have exhibited a pattern of failing to provide the participant with employment as a regular employee with wages, employment benefits, and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work upon completion of the contract.

Job Shadowing – Provides career exploration opportunities.

Internships/Externships – May be paid or unpaid.

Summer Employment - Link academic and occupational learning. This program element is not intended to be a stand-alone program. Youth may be enrolled in summer employment opportunities and exit at the end of the summer; however, this is to be the exception. Youth who participate only in summer activities must have follow-up services provided for a minimum of 12 months. These youth may also be included in the performance measurements. Most youth are to have summer employment opportunities included as part of their year-round service strategy.

Wage Requirements – Participants in paid work experience, on-the-job training, paid internships, or any other paid activities must be paid at the same rate, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills. Wages must at minimum meet minimum wage requirements.

Treatment of Wages – Any earnings or other payments to youth participants are not considered income for the purposes of determining eligibility for or the amount of benefits for any Federal or federally assisted program based on need, e.g., W-2, SSI, etc.

Displacement – A participant in a work experience activity may not displace, including a partial displacement, such as a reduction in non-overtime work hours, wages, or employment benefits, any currently employed employee.

Other Prohibitions – A participant in a WIOA program or activity may not be employed in or assigned to a job if:

- A. Any other individual is on layoff from the same or any substantially equivalent job;
- B. 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 created with the participant; or,
- C. The job is created in a promotional line that infringes in any way on the promotional opportunities of currently employed workers.

- D. The job is vacant because the former occupant is on strike, or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving a work stoppage.

Health and Safety – Health and safety standards established under Federal and State law otherwise applicable to working conditions of employees shall be equally applicable to working conditions of participants engaged in specified activities.

Worker's Compensation – To the extent that a State worker's compensation law applies, workers' compensation must be provided to participants on the same basis as is provided to other individuals in similar employment.

Conditions – Participants in paid work experience must be provided benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work.

PE 4: Occupational Skill Training

Primary occupational skills encompass the proficiency to perform actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Secondary occupational skills entail familiarity with and use of set-up procedures, safety measures, work-related terminology, record keeping and paperwork formats, tools, equipment and materials, and breakdown and clean-up routines.

Training must be on SWWDB's Approved Training Provider list or the State's approved list (with prior approval).

PE 5: Education Offered Concurrently with Workforce Preparation Activities

The three components of an integrated education and training program include: adult education and literacy activities, workforce preparation activities, and workforce training. Adult education and literacy activities are programs, activities, and services such as English language services to achieve competence in reading, writing, speaking, and comprehension. Workforce preparation activities help individuals acquire a combination of basic academic, critical thinking, and digital literacy skills. They improve employability by improving self-management abilities, increasing ability to work with others, and developing other skills necessary for successful transition into post-secondary education, training, and employment.

PE 6: Leadership Development Opportunities

Leadership Development Opportunities are activities that provide youth with the opportunity to take on new roles and responsibilities. They encourage responsibility, employability, and other positive social behaviors. Examples of leadership development opportunities include, but are not limited to:

- A. Exposure to post-secondary educational opportunities
 - A. Community and service learning projects
 - B. Peer-centered activities, including peer mentoring and tutoring
 - C. Organizational and team work training, including team leadership training
 - D. Training in decision-making, including determining priorities
 - E. Citizenship training, including life skill training such as parenting, work behavior training, and budgeting of resources

Other activities which lead to positive social behavior. Positive social behaviors are outcomes of leadership opportunities, often referred to as soft skills. Positive social behaviors focus on areas that may include the following:

- A. Positive attitudinal development

- B. Self-esteem building
- C. Openness to working with individuals from diverse racial and ethnic backgrounds
- D. Maintaining healthy lifestyles, including being alcohol and drug free
- E. Maintaining positive relationships with responsible adults and peers
- F. Contributing to the well-being of one's community, including voting
- G. Maintaining a commitment to learning and academic success
- H. Avoiding delinquency
- I. Postponed and responsible parenting and
- J. Positive job attitudes and work skills

PE 7: Support Services

Supportive services are to be provided to youth who need support to ensure successful participation. Examples of support services available to youth clients include but are not limited to:

- A. Transportation;
- B. Child care;
- C. Work related expenses; and
- D. Assistance with books, fees, and training related applications, tests, and certifications.

Refer any questions regarding what is considered an authorized youth support service to the Workforce Operations Manager for clarification.

PE 8: Adult Mentoring

Adult Mentoring is to be available to youth program participants for the period of participation and a subsequent period, for a total of not less than 12 months. The long-term connection to a caring adult is an important element to positive youth development. Mentor relationships can be:

- A. Employment based;
- B. School based; or
- C. Community based.

PE 9: Follow-up Services

All youth participants must receive some form of follow-up services for a minimum of 12 months after exit. Exit, and therefore follow-up, occurs once the youth is no longer active in any WIOA funded or partner services included in the ISS. The intensity and type of follow-up services is determined at the local level and should be based on the needs of the youth as well as the goals and objectives for the local workforce investment system. Examples of follow-up services include: job shadowing, adult mentoring and tutoring, leadership development activities, supportive services, and work related follow-up activities.

PE 10: Comprehensive Guidance and Counseling

This program element must be appropriate to the needs of the individual youth. This may include career counseling and guidance, as well as drug and alcohol abuse counseling primarily provided to assist a youth in achieving employment-related success. Counseling may be provided by appropriately trained program staff or through referrals to other entities within the community. When referring customers to necessary counseling, the local youth program service provider must coordinate with the organization it refers to in order to ensure continuity of service.

PE 11: Financial Literacy Education

Provide workshops and activities focused on building the financial literacy skills of youth to include topics:

- A. Support the ability of a customer to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions;
- B. Support customers in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;
- C. Teach customers about the significance of credit reports and credit scores, what their rights are regarding their credit and financial information, how to determine the accuracy of a credit report and how to correct inaccuracies; and how to improve or maintain good credit;
- D. Support a customer's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;
- E. Educate customers about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity and financial data;
- F. Support activities that address the particular financial literacy needs of non-English speakers, including providing support through the development and distribution of multilingual financial literacy and education materials;
- G. Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;
- H. Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings; and
- I. Implement other approaches to help customers gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality, age-appropriate, and relevant strategies and channels, including, where possible, timely and customized information, guidance, tools, and instruction.

PE 12: Entrepreneurial Skills Training

Provide training focused on increasing interest in business ownership and other topics preparing youth to start and maintain their own business.

- A. Such training must develop the skills associated with entrepreneurship. Such skills may include the ability to:
 - 1. Take initiative;
 - 2. Creatively seek out and identify business opportunities;
 - 3. Develop budgets and forecast resource needs;
 - 4. Understand various options for acquiring capital and the trade-offs associated with each option; and
 - 5. Communicate effectively and market oneself and one's ideas.
- B. Approaches to teaching youth entrepreneurial skills include, but are not limited to, the following:
 - 1. Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and also may include simulations of business start-up and operation.
 - 2. Enterprise development which provides supports and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants that are needed to

begin business operation and by providing more individualized attention to the development of viable business ideas.

3. Experiential programs that provide youth with experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business that young people participating in the program work in and manage. Or, they may facilitate placement in apprenticeship or internship positions with adult entrepreneurs in the community.

PE 13: Labor Market and Employment Information

Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, are career awareness, career counseling, and career exploration services.

PE 14: Preparation Activities

Preparation Activities are activities that help youth prepare for and transition to post-secondary education and training. These activities may include but are not limited to filling out college applications and financial aid forms.

9.10 OUT-OF-SCHOOL YOUTH (OSY)

WIOA emphasizes services to at-risk youth, especially out-of-school youth. WIOA requires that 75% of youth funds be spent on OSY. This requirement emphasizes WIOA's intent that the most vulnerable youth receive services. SWWDB and the area Youth Committee adjusts programming strategies to ensure the youth program adequately serves the OSY population.

OSY are not only youth who have dropped out of high school. They are also youth who have a high school diploma, but are deficient in basic literacy skills, unemployed, or underemployed. Underemployment is locally defined as someone who has not held a full-time job (30 hours or more per week) for more than six months.

For most OSY who have not completed high school, a year round strategy is to be developed to help the youth obtain a high school diploma or GED. This may include enrolling in an alternative school or other educational institution. These activities would be combined with other positive youth development activities that will prepare the OSY to obtain employment and further their education and training. Service strategies for OSY who do have their high school diploma or GED are to focus on personal development and educational and occupational preparation.

There are a number of key partners local programs should connect with to assist with recruitment of and services to OSY. These partners include but are not limited to Community and Faith Based Organizations, parents, human/social service agencies, Child Welfare agencies, Independent Living agencies, local law enforcement and juvenile justice.

9.11 INCENTIVE AWARD PAYMENTS TO WIOA YOUTH (SWWDB POLICY C-740)

Purpose.

The Federal Register of Workforce Innovation and Opportunity Act (WIOA) proposed rules section 681.640 and the Uniform Administrative Requirements 2 CFR 200 allows for the awarding of incentives payments for recognition and achievement in WIOA related activities. Incentives payments are allowable to youth enrolled into the WIOA Title I Youth program. They are intended to encourage and motivate WIOA youth to reach specific goals and obtain positive outcomes. WIOA regulations do not specifically provide for incentives for adult and dislocated worker participants. Reasonable incentives are allowable only if the local workforce board has written policies and procedures governing incentives payments, and the provision of an incentive is included in the participant's individual service strategy. This document provides the policy of the

Southwest Wisconsin Workforce Development Board (SWWDB) for granting incentive award payments to youth enrolled in the Title I Workforce investment Act (WIOA) youth program.

Policy.

It is the policy of the Southwest Wisconsin Workforce Development Board (SWWDB) to offer reasonable incentives to youth participants to encourage the youth to participate in and complete WIOA Title I activities. The justification and strategy for awarding an incentive must be clearly defined in the youth's ISS. Any incentive award payment shall be made in a uniform and consistent manner, and administered in a manner that ensures all participants receive equal rewards for equal achievement.

For the purposes of this policy, the term "incentive" shall mean an inducement or reward intended to motivate achievement. The incentive must be directly linked to attainment of specific and measurable program outcomes related to employment, education, or work experience activities.

Any incentive shall be limited to WIOA youth programs. WIOA adult and dislocated workers clients are not eligible for incentives. All incentive award payments are subject to the availability of WIOA funds and are not an entitlement. SWWDB may suspend or withdraw authorization for incentive payments at any time and at the sole discretion of SWWDB.

Youth incentive award payments are limited to a lifetime amount of \$500 maximum per eligible youth.

Goals and/or training outcomes eligible for an incentive must be linked to an achievement related to training, employment, work readiness skills, occupational skills, and/or basic skills attainment goals as stated in the clients' ISS and documented in accordance with applicable WIOA regulations. Participants cannot receive multiple incentives payments for the same activity. Achievements eligible for an incentive awards include:

- Attain high school diploma;
- Graduate an alternative school;
- Complete a GED test (incentive can be offered for each test completed);
- Career pathway exploration activities;
- Complete basic, work readiness, or occupational skill attainment goals;
- Complete TABE post-test (EFL test score gain for WIOA performance)
- Create cover letter, resume, sample application, and follow-up letter (All 4 required);
- Obtain unsubsidized employment;
- Retention of employment for 90 consecutive days; and/or
- Attain an post-secondary credential (occupational certificate, diploma, or degree)

Incentives are available to each WIOA eligible youth participant based on need documented in the participant's ISS. WIOA Title I service providers shall maintain required documentation detailing the distribution and management of awards. All incentives are taxable at the full amount of the award and subject to withholding in accordance with Internal Revenue Service (IRS) regulations.

The Chief Executive Officer shall ensure that procedures and systems are established and maintained to document payment of incentive awards. The Finance Manager and the Workforce Operations Manager, under the direction of and in consultation with the Chief Executive Officer, shall be operationally responsible for the documentation, accountability, and management of incentives in accordance with federal and state WIOA rules/guidelines and IRS regulations.

SWWDB shall require all WIOA service providers and grantees receiving funds from a grant or contract administered by SWWDB to comply with this policy and applicable procedures. At a minimum, service providers shall document the need for the incentive and justify issuance of the award in the participant's ISS and in the ASSET system. Service providers will also maintain records verifying the client received the award

through an original signature on a receipt form. It is the responsibility of each service provider to become aware of all applicable regulations and to monitor personnel and client activities to ensure compliance. SWWDB shall review grantee compliance with this policy during the annual monitoring process.

Case managers are required to follow procedure guidance set forth in SWWDB Policy: Youth Incentive Awards Procedure C-740-1.

10. Common Performance Indicators

The common performance indicators are the key indicators of success in achieving goals of WIOA. The indicators are used to provide information for system wide reporting to the Department of Labor and provide a basis for evaluation for continuous improvement. For the purposes of Workforce Innovation and Opportunity Act (WIOA) performance, only those eligible clients who have received a service beyond basic career services (adult and dislocated workers) or Design Framework (youth) are included. (see section 10.5 for services that will not trigger inclusion into the common performance indicators)

Case managers and others who are working directly with WIOA eligible participants must be aware of the WIOA core indicators of performance.

10.0 ADULT AND DISLOCATED WORKER

Employment Rate (Q2 & Q4 post-exit)

Percentage of customers who are in unsubsidized employment during the second and fourth quarters after exit from the program.

Median Earnings (Q2 post-exit)

Median earnings of customers who are in unsubsidized employment during the second quarter after exit from the program, as established through direct UI wage record match, Federal or military employment records, or supplemental wage information. Note: In order to calculate the quarterly wage for quarter 2 after exit for a customer using supplemental wage information, case managers are to use a wage conversion methodology provided the DOL and DWD. See conversion formulas listed below:

- A. **Convert hourly rate to quarterly wages** – hourly rate X hours worked per week X 13 weeks per quarter = Quarterly Wages. *Example: \$7.25 X 40 hours X 13 = \$3,770 second quarter wages*
- B. **Convert weekly wages to quarterly wages** – weekly wages X 13 weeks per quarter = Quarterly Wages. *Example: \$500 X 13 = \$6,500 second quarter wages*
- C. **Convert biweekly wages to quarterly wages** – biweekly wages X 6.5 biweekly pay periods per quarter = Quarterly Wages. *Example: \$1,100 X 6.5 = \$7,150 second quarter wages*
- D. **Convert monthly wages to quarterly wages** – monthly wages X 3 months per quarter = Quarterly Wages. *Example: \$2,000 X 3 = \$6,000 second quarter wages*
- E. **Convert annual wages to quarterly wages** – annual wages / 4 quarters per year = Quarterly Wages. *Example: \$26,000 / 4 = \$6,500 second quarter wages*

Credential Attainment Rate

The percentage of those customers enrolled in an education or training program (excluding those in on-the-job training and customized training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program. A customer who has attained a secondary school diploma or its recognized equivalent only counts if the customer is employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year (365 days) after exit from the program.

Below is a list of the types of organizations and institutions that award recognized postsecondary credentials (not all credentials by these entities meet the definition of recognized postsecondary credential).

- A. State educational agency or a State agency responsible for administering vocational and technical education within a State;
- B. An institution of higher education described in Section 102 of the Higher Education Act (20 USC 1002) that is qualified to participate in the student financial assistance programs authorized by title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in Federal student financial aid programs;
- C. An institution of higher education that is formally controlled, or has been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes.
- D. A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential) or product manufacturer or developer (e.g., recognized Microsoft Information Technology certificates, such as Microsoft Certified IT Professional (MCITP), Certified Novell Engineer, a Sun Certified Java Programmer, etc.) using a valid and reliable assessment of an individual's knowledge, skills, and abilities;
- E. ETA's Office of Apprenticeship or a State Apprenticeship Agency;
- F. A public regulatory agency, which awards a credential upon an individual's fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., Federal Aviation Administration aviation mechanic license, or a State-licensed asbestos inspector);
- G. A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons.
- H. Job Corps, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements.

Examples of secondary school diplomas, alternate diplomas, and recognized equivalents recognized by individual States include:

- A. Obtaining certification of attaining passing scores on a State-recognized high school equivalency test.
- B. Earning a secondary school diploma or State-recognized equivalent through a credit bearing secondary education program sanctioned by State law, code, or regulation.
- C. Obtaining certification of passing a State recognized competency-based assessment.
- D. Completion of a specified number of college credits.

The following are acceptable types of credentials that count toward the credential attainment indicator:

- A. Secondary School diploma or recognized equivalent
- B. Associate's degree
- C. Bachelor's degree
- D. Graduate degree for purposes of the VR program
- E. Occupational licensure
- F. Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates
- G. Occupational certification
- H. Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

Measurable Skills Gain

The percentage of customers who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment. Once a customer enters a credential attaining program, they will remain in the measurable skills gain indicator each program year until exited from the program or at the completion of the credential training, if in postsecondary education or training. **(Note: the current program year is being used to establish a baseline for this measure.)** Depending upon the type of education or training program, documented progress is defined as one of the following:

- A. Documented achievement of at least one educational functioning level of a customer who is receiving instruction below the postsecondary education level;
- B. Documented attainment of a secondary school diploma or its recognized equivalent;
- C. Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a customer is meeting the State unit's academic standards;
- D. Satisfactory or better progress report, towards established milestones, such as completion of OJT or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training; or
- E. Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.

For postsecondary education, the gain must demonstrate a sufficient number of credit hours – which is at least 12 hours per semester or, for part-time students, a total of at least 12 hours over the course of two completed consecutive semesters during the program year.

Case managers are to update ASSET according to the appropriate skill gains.

10.1 YOUTH**Placement in Employment/Training/Education (Q2 & Q4 post-exit)**

Percentage of customers who are in education or training activities, or in unsubsidized employment the second and fourth quarters after exit.

Median Earnings (Q2 post-exit)

Median earnings of customers who are in unsubsidized employment during the second quarter after exit from the program, as established through direct UI wage record match, Federal or military employment records, or supplemental wage information. Note: In order to calculate the quarterly wage for quarter 2 after exit for a customer using supplemental wage information, case managers are to use a wage conversion methodology provided the DOL and DWD. See conversion formulas listed below:

- A. **Convert hourly rate to quarterly wages** – hourly rate X hours worked per week X 13 weeks per quarter = Quarterly Wages. *Example: \$7.25 X 40 hours X 13 = \$3,770 second quarter wages*
- B. **Convert weekly wages to quarterly wages** – weekly wages X 13 weeks per quarter = Quarterly Wages. *Example: \$500 X 13 = \$6,500 second quarter wages*
- C. **Convert biweekly wages to quarterly wages** – biweekly wages X 6.5 biweekly pay periods per quarter = Quarterly Wages. *Example: \$1,100 X 6.5 = \$7,150 second quarter wages*
- D. **Convert monthly wages to quarterly wages** – monthly wages X 3 months per quarter = Quarterly Wages. *Example: \$2,000 X 3 = \$6,000 second quarter wages*

- E. **Convert annual wages to quarterly wages** – annual wages / 4 quarters per year = Quarterly Wages.

Example: \$26,000 / 4 = \$6,500 second quarter wages

(Note: the current program year is being used to establish a baseline for this measure.)

Credential Rate

The percentage of those customers enrolled in an education or training program (excluding those in on-the-job training and customized training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after exit from the program. A customer who has attained a secondary school diploma or its recognized equivalent only counts if the customer is employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year (365 days) after exit from the program. All ISY are included in the credential attainment indicator since they are attending secondary or postsecondary school.

Below is a list of the types of organizations and institutions that award recognized postsecondary credentials (not all credentials by these entities meet the definition of recognized postsecondary credential).

- A. State educational agency or a State agency responsible for administering vocational and technical education within a State;
- B. An institution of higher education described in Section 102 of the Higher Education Act (20 USC 1002) that is qualified to participate in the student financial assistance programs authorized by title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in Federal student financial aid programs;
- C. An institution of higher education that is formally controlled, or has been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes.
- D. A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential) or product manufacturer or developer (e.g., recognized Microsoft Information Technology certificates, such as Microsoft Certified IT Professional (MCITP), Certified Novell Engineer, a Sun Certified Java Programmer, etc.) using a valid and reliable assessment of an individual's knowledge, skills, and abilities;
- E. ETA's Office of Apprenticeship or a State Apprenticeship Agency;
- F. A public regulatory agency, which awards a credential upon an individual's fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., Federal Aviation Administration aviation mechanic license, or a State-licensed asbestos inspector);
- G. A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons.
- H. Job Corps, which issues certificates for completing career training programs that are based on industry skills standards and certification requirements.

Examples of secondary school diplomas, alternate diplomas, and recognized equivalents recognized by individual States include:

- A. Obtaining certification of attaining passing scores on a State-recognized high school equivalency test.
- B. Earning a secondary school diploma or State-recognized equivalent through a credit bearing secondary education program sanctioned by State law, code, or regulation.
- C. Obtaining certification of passing a State recognized competency-based assessment.
- D. Completion of a specified number of college credits.

The following are acceptable types of credentials that count toward the credential attainment indicator:

- A. Secondary School diploma or recognized equivalent
- B. Associate's degree
- C. Bachelor's degree
- D. Graduate degree for purposes of the VR program
- E. Occupational licensure
- F. Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates
- G. Occupational certification
- H. Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

Measurable Skills Gain

The percentage of customers who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment. It should be noted that all ISY are included in the measurable skill gains indicator since they are attending secondary or postsecondary school. Once a customer enters a credential attaining program, they will remain in the measurable skills gain indicator each program year until exited from the program. **(Note: the current program year is being used to establish a baseline for this measure.)**

Depending upon the type of education or training program, documented progress is defined as one of the following:

- A. Documented achievement of at least one educational functioning level of a customer who is receiving instruction below the postsecondary education level;
- B. Documented attainment of a secondary school diploma or its recognized equivalent;
- C. Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a customer is meeting the State unit's academic standards;
- D. Satisfactory or better progress report, towards established milestones, such as completion of OJT or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training; or
- E. Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.

For postsecondary education, the gain must demonstrate a sufficient number of credit hours – which is at least 12 hours per semester or, for part-time students, a total of at least 12 hours over the course of two completed consecutive semesters during the program year.

For ISY customers, case managers should be aware that if an ISY customer is enrolled at the end of the program year, the ISY will be counted in the measurable skills gain indicator for that current program year. Case managers are not allowed to postpone the enrollment of these youth customers if it is not in the best interest of the youth.

10.2 EMPLOYER**Business Satisfaction**

The State of Wisconsin via the Council on Workforce Investment approved two methods of measuring business satisfaction (Note: the current program year is being used to establish a baseline for this measure.):

- A. Employer Penetration Rate: The total number of establishments who received a service/Total number of establishments in an area or state.
- B. Repeat Business Customers: Number of establishments that received a service in the reporting period and the previous three years/Number of establishments who received a service during the previous three years.

10.3 TIMING OF PERFORMANCE INDICATOR

WIOA Programs are run on a “Program Year” that starts on July 1st and ends on June 30th. The timing of program years and performance years are different.

Performance measures are calculated on two different groups of exiters at two different time periods.

None of them sync up exactly with the established WIOA program year.

Program years and performance years are different because every state has to turn in an annual report showing what the WIOA programs accomplished during that program year in that state, including whether the state “met” federally negotiated performance targets for that program year.

At this time, accurate performance data cannot be collected due to the measures that went into effect on July 1, 2016. Those customers who exited prior to July 1, 2016 will not be counted under the WIOA performance measures. However, DWD will be providing hypothetical performance numbers to evaluate how we would have performed if customers who exited prior to July 1, 2016 were counted in the current year’s performance results. There are no sanctions associated with the hypothetical performance numbers.

Additionally, the use of Unemployment Insurance (UI) wage data is the foundational data source for performance and adds at least an additional two quarters for employers to report and for the state to process. If DWD used the program year, information on exiters would be incomplete. UI wage reporting runs on a calendar year and is reported quarterly by employers in Wisconsin according to this schedule:

- 1st qtr. (Jan., Feb., Mar.) due April 30;
- 2nd qtr. (Apr., May, June) due July 31;
- 3rd qtr. (July, Aug., Sept.) due October 31; and
- 4th qtr. (Oct., Nov., Dec.) due January 31.

Below represents the hypothetical performance periods established by DWD.

Program Year 16: July 1, 2016 to June 30, 2017	
Performance Indicator Period	Indicator
07/01/2014 to 06/30/2015	Adult/Dislocated Worker Q2 Unsubsidized Employment Youth Q2 Education/Unsubsidized Employment Median Earnings (all programs)
01/1/2014 to 12/31/2014	Adult/Dislocated Worker Q4 Unsubsidized Employment Youth Q4 Education/Unsubsidized Employment Credential Attainment Rate (all programs)
7/01/2016 to 6/30/2017	Measurable Skill Gains (all programs)**

***Measurable Skill Gains is the only performance indicator that is not an exit indicator.*

Performance goals are negotiated annually between the Department of Labor and DWD. Subsequently, DWD negotiates with all of the local areas. Final goals for each WDA represent achievable outcomes based on past performance, local economic conditions, and continuous improvement. Program operators are a partner in achieving performance measures and are held accountable to the goals established for the Southwest Wisconsin Workforce Development Area.

10.4 EXCLUSIONS

SWWDB recognizes that there are times when customer participation may be hindered due to various unforeseen reasons and will need to be excluded from the performance indicators. These reasons inhibit the customer from actively participating in the program and ultimately prevent them from becoming employed in unsubsidized employment or participating in or completing educational and training programs.

Below are a list of reasons why a program customer may be excluded from the WIOA Adult and Dislocated Worker performance indicators:

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

Below are a list of reasons why a program customer may be excluded from the WIOA Youth performance indicators:

- A. A customer exits the program because he or she has become incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during the course of receiving services as a customer.
- B. The customer exits the program because of medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
- C. The customer exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.
- D. The customer is in the foster care system as defined in 45 CFR 1355.20(a), and exits the program because the customer has moved from the local workforce area as part of such a program or system.

10.5 PARTICIPATION TRIGGERS

Certain services provided by case managers do not trigger participation in WIOA programs and will not count towards the performance indicators identified in sections 10.0 and 10.1 above.

The following list shows what services do not trigger participation in WIOA Adult, Dislocated Worker, and Youth programs:

Participation Level Services Chart for WIOA Adult, Dislocated Worker, and Youth Programs		
Service Type	Triggers Participation	Category of Service
Eligibility Determination	No	Basic Career Service
Outreach, Intake, Orientation	No	Basic Career Service
Info on in-demand occupations	No	Basic Career Service
Job Center info	No	Basic Career Service
Labor market info	No	Basic Career Service
Job skills needs	No	Basic Career Service
Job search info	No	Basic Career Service
Local area performance	No	Basic Career Service
On-line self services	No	Basic Career Service
Program performance and costs	No	Basic Career Service
Support services info	No	Basic Career Service
Unemployment Insurance	No	Basic Career Service
Design framework (all service levels) - Youth only	No	N/A

All other services provided will trigger participation in the WIOA Adult, Dislocated Worker, and Youth programs and will cause the customer to be counted towards the established performance indicators discussed in section 10.0 and 10.1 of this program guide. Care should be taken by the case managers to ensure the correct level of services are provided to their customers prior to and during program participation.