One Stop Employment Solutions

Adult & Dislocated Worker Programs

OPERATIONS MANUAL

Workforce Innovation and Opportunity Act (WIOA)

Disclaimer

This policy is based on NDOL's reading of the statute along with the Notice of Proposed Rulemaking released by USDOL. This policy may be subject to change as additional federal regulations and TEGLs are released. This policy is not intended to be permanent and should be viewed as a placeholder until final federal regulations are released in early 2016.

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ONE STOP EMPLOYMENT SOLUTIONS

SECTION 1

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

WIOA & NEworks Overview

SECTION 1 - WIOA PROGRAM

OVERVIEW OF THE WIOA PROGRAM

Purpose of the Workforce Innovation and Opportunity Act (WIOA) Programs:
The purpose of the WIOA Programs is to provide allowable workforce development activities to eligible clients that will increase employment retention and earnings of participants, and increase occupational skill level attainment by participants.

As a result, successful application of these activities will improve the quality of Nebraska's workforce, reduce welfare dependency, and enhance the productivity and competitiveness of the State and Nation. The Workforce Innovation and Opportunity Act (WIOA):

> (1) Increases access to and opportunities for the employment, education, training, and support services for individuals, particularly those with barriers to employment;
>
> (2) Supports the alignment of workforce investment, education, and economic development systems in support of a comprehensive, accessible, and high-quality workforce development system;
>
> (3) Improves the quality and labor market relevance of workforce investment, education, and economic development efforts;
>
> (4) Promotes improvement in the structure and delivery of services;
>
> (5) Increases the prosperity of workers and employers; and
>
> (6) Provides workforce development activities that increase employment, retention, and earnings of participants and that increase postsecondary credential attainment and as a result, improve the quality of the workforce, reduce welfare dependency, increase economic self-sufficiency, meet skill requirements of employers, and enhance productivity and competitiveness of the nation.

Client Outreach: The client outreach and recruitment effort must be designed and established at the local service provider level and the effort shall include a local network to disseminate information regarding workforce investment services, encourage client applications, and encourage client referrals from one-stop partners and employers.

Interagency meetings with the one-stop partners, community based organizations, local chambers and economic development agencies, labor unions, etc. will provide a means for effective networking. In addition, a system to establish employer contacts on a regular basis will also make a positive contribution to the outreach and recruitment effort.

The outreach and recruitment effort must also make an effort to provide equitable workforce investment services to the substantial segments of the eligible population. Substantial segments of the population include members of sexes, various race/ethnicity and age groups, and individuals with disabilities. Other characteristics which may be considered "substantial segments" are those individuals who are basic skills deficient, high school dropouts, welfare recipients, offenders, homeless, substance abusers, those who require English as a second language.

Client Registration: The NEworks system is the electronic data mechanism that implements the registration or common intake process.

Only authorized users will be allowed to access NEworks either through the state infrastructure or the Internet, depending on their location. To become an authorized user, the staff person must submit an access form for approval to the Nebraska Department of Labor (NDOL). Under no circumstance should authorized users allow other individuals to access the system utilizing the authorized user's password.

Client Enrollment: One Stop Employment Solutions utilizes the NDOL NEworks system to enroll clients into career or training services. Only those individuals who have been determined to be eligible for these services shall be enrolled. To become an authorized user, the staff submit an access form for approval. Under no circumstance should authorized users allow other individuals to access the system utilizing the authorized user's password. A system manual/guide is not included in this section; once trained, staff will have access to the Staff Resources section of NEworks.

Documentation: Documentation of program activities is required for the delivery of WIOA services. Federal rules state the following:

> "All recipients of federal funds must establish a financial and programmatic data system that will provide a clear audit trail for auditors, monitors, and investigators."

All data, including fiscal and client service activities, which support an individual's enrollment must be sufficient to allow auditors, monitors, and investigators to conduct an oversight review of program operations.

Issues that require maximum documentation include fiscal expenditures, eligibility, service representative decision for enrollment, supportive services, individual employment plan, etc.

The documentation requirements of program activities are one of the more important issues to which service providers must adhere. Without adequate documentation, audit findings will result in questioned or disallowed grant costs, which many require repayment to the federal grant office or will result in monitor findings which require a corrective action plan and subsequent corrective action. Efforts to resolve audit or monitor review findings require an exorbitant amount of staff time and other costs to correct the identified problems.

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 2

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

General Information & Program Design

PROCEDURE FOR REFERRALS TO OSES

Purpose

To define the process to refer individuals to the OSES program.

Policy

Referral to the OSES programs can be from a number of different sources. These sources are described below.

Walk Ins

Individuals who walk into the AJC resource room and inquire about training are provided the "Yellow Half Sheet Flier" which directs them to call the Appointment Line at 402-441-7111. If they request to speak to someone directly, a program staff will be notified. If a program staff is available they will go the resource room and let the individual know what is required for them to apply to the program. They must be registered on NEworks and a date for an initial appointment is set.

Referrals from NEworks

When a referral for the OSES program is received from NEworks they come to the Office Specialist via email. The OS will print the referral and file it in a folder in the email system. The information is entered into a spreadsheet. A letter is sent to each of these individuals asking if they are interested in receiving OSES services to call the Appointment Line.

WIOA Pre-Application through NEworks

Pre-Applications through NEworks are printed off by the OS. Age is checked and if 24 years old or younger the name and contact information is provided to a youth case manager via a message form. If 25 years old or older the name and contact information is provided to an adult case manager. The individual's name and contact information, and which case manager is assigned to return the call are logged in the Call List. Depending on staff availability, calls or emails are returned by a case manager within 24 hours. Results from the call are logged in the Call List under Comments, i.e., an initial appointment has been scheduled, individual not interested, no response, left a message (case managers are required to make 3 attempts to contact), family member calling for information, etc.

Calls to the Appointment Line

When a call is made to the Appointment Line an email is sent to the OS. The Appointment Line is monitored numerous times during the day. Name and contact information is provided to a case manager via a message form. The individual's name and contact information, and which case manager is assigned to return the call are logged in the Call List. Depending on staff availability, calls are returned by a case manager within 24 hours. Results from the call are logged in the Call List under Comments, i.e., an initial appointment has been scheduled, individual not interested, no response, left a message (case managers are required to make 3 attempts to contact), family member calling for information, etc.

GENERAL INFORMATION FOR PROGRAM DESIGN

Concurrent Enrollment

Under Section 3 of WIOA, eligible adults are defined as individuals age 18 or older. WIOA defines eligible youth as 14 through 21 years of age, if in-school youth, and 16 through 24, if out-of-school youth. Thus, individuals between the ages of 18 through 24 [at registration] may be eligible for both adult and youth programs.

- Eligible individuals who are 18 through 24 years old [at registration] may participate in adult and youth programs concurrently. Such individuals must be eligible under the youth and adult/dislocated worker eligibility criteria applicable to the services received. Local program operators should determine the appropriate level and balance of services under the youth and adult programs. This determination should be driven by program design and services provided.

- Local program operators must identify and track the funding streams which pay the costs of services provided to individuals who are participating in youth and adult/dislocated worker programs concurrently, and ensure that services are not duplicated.

- OSES Case Managers should determine the appropriate program for the participant based on the service needs of the participant and if the participant is career-ready based on an objective assessment of their occupational skills, prior work experience, employability, and participants needs as required in WIOA Section 129(c)(1)(A).

Application Time Limit

NEworks is used by all of the American Job Centers in Nebraska to collect data items on registrants. The WIOA Application Date is the date when the WIOA Application is created. When entering it on NEworks, it cannot be a date in the future.

The WIOA Participation Date is the date following a determination of eligibility (when necessary) to participate in the program when the individual begins receiving a service funded by the program. It counts as the official point when the participant begins counting in performance measures. Under this policy, if over 90 days elapse between the WIOA Application Date and the WIOA Participation Date, then the application will be closed.

Even with the ninety day limit, there are several items on NEworks that must be verified and updated (when appropriate) at the date of WIOA participation including: Education Level; School Status, Employment Status, Enrolled in Education at Participation, Unemployment Compensation, and Age at Participation.

Former WIA Participants

On July 1, 2015, all WIA participants who were still enrolled in the WIA program *must* be grandfathered into the WIOA program, even if the participant would not otherwise be eligible for WIOA. Local programs are not required to complete an eligibility re-determination if the

participant was determined eligible and enrolled under WIA. Furthermore, these participants must be allowed to complete the WIA services specified in their individual service strategy.

Nondiscrimination

WIOA Section 188 provides that no individual may be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with, any such program or activity because of race, color, religion, sex, national origin, age, disability, or political affiliation or belief.

Participation in programs and activities must also be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States. Individuals with employment authorization may access any WIOA services for which they otherwise would qualify.

Verification of Lawful Presence

Each agency responsible for determining eligibility for WIOA benefits in Nebraska is required to

1. Have each applicant for WIOA services attest that he or she is a U.S. citizen or a qualified alien. This must be done using the format prescribed by the City of Lincoln.
    a. If in the above Step 1, the applicant indicates he or she is an alien, then complete Step 2 as follows:

Verify his or her lawful presence in the United States using the SAVE (Systematic Alien Verification for Entitlements) Program operated by the U.S. Department of Homeland Security. The process is initiated by contacting the Senior Office Assistant, City of Lincoln, Finance Department in the Accounting Division, phone number 402-441-7421

Referrals

All individuals who request WIOA services who are not enrolled in the WIOA program due to not being eligible or suitable will need to be referred to another agency, if appropriate.

For those clients who are not enrolled in the WIOA program and referred, the referral must be documented through the NEworks system.

See Staff Referral to Providers Instructions in Section 11 – Attachment A

Agencies to refer individuals to may include:

- Employment Services
- Adult Basic Education
- Vocational Rehabilitation

Re-enrollment

All individuals are given the opportunity to re-apply for WIOA services. Re-enrollment is determined on a case-by-case basis. Any WIOA funds already expended will be subtracted from any costs OSES expends on a re-enrollment.

GENERAL INFORMATION ON CLIENT ASSESSMENT

General Information on Client Initial Assessment

Client assessment may be conducted under the provisions of basic career services. The “initial assessment” will be used to determine eligibility before the client can be assigned a participation date for program activities. Once the client has registered and been determined eligible, an “objective assessment” will be conducted as part of individualized career services to provide preliminary information regarding the individual’s basic skills, abilities, aptitudes, interests, experience, supportive service needs, and program sustainability.

The CASAS or COMPASS will be utilized to determine basic reading and math levels. A variety of tools, such as, but not limited to, Kuder, ONET, CAPS, COPS, COPES will be utilized to determine career and job interests.

The information collected by the assessment will be utilized to determine if the client is able to become employed by providing individual career services such as work experience or pre-vocational skills development or determine if the client requires training services to become employed.

Under individualized career services, additional comprehensive and specialized assessments of skill levels and service needs may be made to include diagnostic testing, use of other specialized assessment tools, and in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals.

The information collected through the objective and other assessments will be used by the Case Manager to develop employment plans and establish employment goals.

PROCEDURE FOR CLIENT ASSESSMENT

Purpose

To establish the process and requirements that will assist the determination of eligibility for Workforce Innovation and Opportunity Act (WIOA) programs.

Policy

Initial Assessment

An initial assessment, under basic career services, will be conducted on all individuals seeking services authorized by the WIOA. The initial assessment provides preliminary information about the individual's skill levels, aptitudes, interests, and supportive service needs, and may be utilized to determine program eligibility by identifying the individual's program suitability or to determine necessary referral to a more appropriate service provider. The initial assessment will also be utilized to determine if the individual requires further services (individualized career services) in order to obtain employment.

Basic Skills Deficient

Effective July 1, 2015, all clients in need of career services (not just self-service or informational activities) may be administered the CASAS or COMPASS as part of the initial assessment process in order to determine client's basic skills level. Testing administered through other partners may also be accepted by the service provider.

Client Case File

For all participants who are determined eligible and receive Workforce Innovation and Opportunity Act services, a copy of the initial assessment must be maintained in the participant's file. The initial assessment documentation in the client's file should include a combination of the following: case notes, referral, Self- Assessment form, interest assessment results, and any alternate assessment tools or test results, if used.

PROCEDURE FOR SELECTIVE SERVICE & VETERAN'S PRIORITY

Purpose

To identify the requirements of the Military Selective Service Act and Veteran's Priority

Policy

Selective Service & VETERAN'S PRIORITY

Local programs shall ensure that each individual participating in any program established under Title I of WIOA or receiving any assistance or benefit under such Title, has not violated Section 3 of the Military Selective Services Act (50 U.S.C. App. 453) by not presenting and submitting to registration as required pursuant to such Section.25

Male youth, age 18-24, and who are subject to the registration requirements of the Military Selective Service Act must comply with such requirements in order to be determined eligible. Youth who are required to register, but have not registered, shall be referred to the Military Selective Service System for registration prior to enrollment.

> Note: Those male youth who are enrolled when age 17 or below and are still active in the WIOA program when they turn 18 years of age have 60 days to comply with this requirement (30 days prior to their birth date until 30 days after). Those clients who fail to comply will not be eligible to receive services until they can document their Selective Service Registration.

Not applicable – If the individual is a female or a male born before 1960 or a male under the age of 18. If unregistered male is 26 years of age or older and has a visible or obvious handicap or has received an honorable discharge or release under honorable conditions, then "not applicable" should be entered in NEworks.

- A male in the over age 25 group who is not registered (but should be) may nevertheless become eligible for WIOA. A Registration Status Information letter must be obtained from the Selective Service System. Upon receipt of the letter, Local Area is to determine the nature of the response.

- If the response is favorable per the Selective Service System letter, and the individual is otherwise eligible, then services may be provided. If the response is deemed unfavorable, the individual in question may not be served.

Selective Service System
Attention: Status Information Letter
Box 94638
Palatine, Illinois 60094-4638

- The individual should request a Registration Status Information letter form:

  - A printable version and the instructions for filling out the "Request for Status Information Letter" are available on the Selective Service System website at http://www.sss.gov/instructions.html– "Selective Service: Request for Status Information Letter and Instructions".

- The following information is required by the Selective Service to obtain a Status Information Letter:
    - Individuals name
    - Current address
    - Social Security Number
    - Date of birth
    - Daytime telephone number
    - Email address if applicable
    - A statement that the individual is requesting a Request for Status Information Letter under Section 3 of the Military Selective Service Act.
    - The individual's documentation regarding his reasons for not registering for the draft.

Veteran's Priority

Priority will be given to any individual who qualifies as a veteran and or eligible military spouse. The priorities are listed in a ranking system, with the top priority going to the first population listed, the next level of priority going to the second population listed and so on.

1. Veterans who are recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all other criteria for youth eligibility)

2. Military Spouses who are recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all other criteria for youth eligibility)

3. Non-Veterans who are recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all criteria for youth eligibility)

4. Veterans who are NOT recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all other criteria for youth eligibility)

5. Military Spouses who are NOT recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all other criteria for youth eligibility)

6. Non-Veterans who are NOT recipients of public assistance or meet low income guidelines: (if they otherwise satisfy all criteria for youth eligibility)

PROCEDURE FOR VETERANS' PRIORITY PROVISIONS

Purpose

To outline the priority of service requirement for veterans (and some spouses) who otherwise meet the eligibility requirement for participation in Depart of Labor (DOL) training programs.

Policy

The term "priority of service" means, with respect to any qualified job training program, that a covered person shall be given priority over a non-covered person for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provision of the law.

The term "covered person" as defined in section 2(a) of the Jobs for Veterans Act [38 U.S.C. 4215(a)] means a veteran or eligible spouse.

"Veteran" means a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service includes full-time duty performed strictly for training purposes nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities. [State mobilizations usually occur in response to event such as natural disasters.] Whether the veteran served domestically or overseas is not relevant to the determination of veteran status for purposes of applying priority.

Eligible Spouse means the spouse of any of the following:

1. Any veteran who died of a service-connected disability;

2. 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;

3. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or

4. Any veteran who died while a disability, as indicated in paragraph 3 (above), was in existence. §4215(a)

[Note: Not every spouse of a person who dies on active military duty qualifies as an "eligible spouse." Only spouses meeting the conditions above qualify as "eligible." Also, if a widow(er) who qualifies under either Criteria 1 or Criteria 4 chooses to remarry, they retain qualification as an "eligible spouse." Spouses considered under Criteria 2 and 3 (above) are eligible only during the time that the service member or veteran remains in that status.

For example, is a veteran with a total service-connected disability were to receive a revised disability rating at a lower level, then the spouse's eligibility under Criteria 3 would be lost. If a spouse whose

eligibility is derived from a living veteran or service member becomes divorced, the spouse would lose the eligibility to priority at that point.]
The term “non-covered person” means any individual who meets neither the definition of “veteran,” nor the definition of “eligible spouses.”

A “qualified job training program” means any program or service for workforce preparation, development, or delivery that is directly funded, in whole or in part, by the U.S. Department of Labor.

PROCEDURE FOR SOCIAL SECURITY NUMBERS COLLECTIONS AND USE

Purpose

To establish the process and requirements for social security numbers collection and use.

Policy

When requesting a participant's social security number, local area staff must explain how the social security number shall be used and how a participant's privacy will be ensured.

Steps Nebraska Takes to Ensure Privacy Is Protected

1. Social security numbers are maintained in a physically and electronically secure and confidential manner.

- Staff logging into the Management Information System (NEworks) must have received authorization and a password.

- Records forwarded to the National office have a different identifying code rather than using social security numbers.

- Physical or electronic participant files and performance information with social security numbers must be stored in a secure manner.

2. Nebraska Department of Labor staff are responsible for following the requirements pertaining to the confidentiality and disclosure of state unemployment compensation information (which includes wage records) found at 20 CFR 603 and Nebraska Employment Security Law, §48-612.

3. Disclosure of a participant's social security number (without signed release) is prohibited. This prohibition springs from WIOA section 185(a) (4) which states that records maintained by states must be made available to the public upon request with certain exceptions. These exceptions include the disclosure of information that would constitute a clearly unwarranted invasion of personal privacy and privileged or confidential financial information.

Guidelines

If is necessary to request a participant's social security number when offering the following services:

- Staff-Assisted Services related to eligibility determination, job search activities, and employment. These services would include activities such as: staff-assisted career guidance including the development of an employability and/or individual employment plan, assessments, career guidance and counseling, customized labor market information, resume assistance, federal bonding assistance, job search assistance, job referrals, and career workshops.

- All Intensive, Training, and Education Services. These services include assessment tests used to ascertain a participant's education level and/or employability, occupational skills

training, on-thejob training, educational and job training counseling, referrals to educational services, and prevocational training and related services.

Note: Self-Services are those that an individual accesses independently without staff assistance, either in a physical One-Stop Career Center, or remotely via the Internet. A social security number will be requested if and when a person who accesses self-services requests any staff-assisted service and/or is seeking to access more intensive services. Visitors who wish to review the list of services available through a one-Stop Career Center, who want to access labor market information, or who are conducting a job search without the assistance of staff and do not request a referral to a specific job may take advantage of self-service activities offered through the state's One-Stop Career Center without providing a social security number.

Refusal to Disclose

This policy does not imply or require that a participant provide a social security number to the state or locals to receive services through WIOA or any other workforce investment program, with the exception of a participant filing a claim for unemployment compensation. In instances where a participant does not voluntarily disclose a social security number, the outcomes of this individual may be excluded from performance measures. Section 7 of the Privacy Act [5 U.S.C. Section 552a

Note (Disclosure of Social Security Number)] provides that unless the disclosure is required by Federal Statute, "it shall be unlawful for any Federal, state or local government agency to deny to any individual and right, benefit, or privilege provided by law because of such individual's refusal to disclose his social security account number." Again, the one exception is that claimants filing for unemployment insurance must provide their social security number.

PROCEDURE FOR SAVE: ELIGIBILITY VERIFICATION OF LAWFUL PRESENCE IN THE UNITED STATES

Purpose and Reference

To identify the requirements of LB 403 regarding Eligibility Verification of Lawful Presence in the United States for WIOA participants. Every agency or political subdivision of the State of Nebraska shall verify the lawful presence in the United States of any person who has applied for public benefits administered by an agency or political subdivision of the State of Nebraska.

Policy

Criteria: Beginning October 1, 2009, every agency responsible for determining eligibility for WIA/WIOA benefits in Nebraska is required to:

1. Have **each applicant for WIOA services** attest that he/she is a U.S. citizen or a qualified alien.

   If in the above Step 1, the applicant indicates he/she is an alien, then complete Step 2 as follows:

2. Verify his/her lawful presence in the United States using the SAVE (Systematic Alien Verification for Entitlements) Program operated by the U.S. Department of Homeland Security.

Procedure:

1. Starting October 1, 2009, any NEW person being considered for the WIA/WIOA program must follow this process.
2. Inform the applicant that to be considered eligible for the WIA/WIOA program, he/she must attest that he/she is a U.S. citizen or a qualified alien.
3. If the **applicant does not agree** to attest their status, the file will be closed. The process below should already be taking place with every WIOA applicant. (If the applicant does not mark one of the boxes on the Attestation Form, you must select #3 in field 22.)
4. If the **applicant agrees** to attest their status, have them complete the *United States Citizenship Attestation Form*. (Keep a copy of the completed form in the client's file.)
5. If the **applicant cannot mark one of the boxes** on the form, close the file. (see #3 above).
6. If they **mark they are a U.S. Citizen**, continue with the WIOA enrollment process
7. If they **mark they are a qualified alien**, they must provide an alien number and a copy of their documentation with their Alien ID number on it. (Keep a copy of the supporting documentation in the client's file.)
8. To verify their status as a qualified alien, send a SAVE request to the Senior Office Assistant, City of Lincoln, Finance Department in the Accounting Division, phone number 402-441-7421for verification:

- In the SAVE e-mail request, include:
    - applicants first and last name
    - copy of Social Security card
    - Citizenship attestation form with alien ID number
    - source of documentation (you do need to send a copy of the documentation, including front and back of cards, if applicable)

9. The Senior Office Assistance will run the applicant through SAVE to determine if they are a qualified alien.
    - **Is a qualified alien** and the applicant may proceed with the enrollment process
    - **Is not a qualified alien** and the applicant should be resulted as Closed Never Enrolled (see #3 above)

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 3

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

Client Eligibility

PROCEDURE FOR APPLICATION & PARTICIPATION

Purpose and Background

To establish the process and requirements for the application, documentation and enrollment process.

Policy

Application: The WIOA Application Date is the date when the WIOA application is created. It cannot be a date in the future. If over 90 days elapses between the WIOA Application Date and the WIOA Participation Date the application will be closed

Process

Once a referral is made NEworks registration must be completed.

Initial meeting is scheduled and individual is asked to be registered in NEworks and bring proof of age.

1st meeting
Verify registered in NEworks
Present proof of age
Review program requirements with individual

Application date is established and application is started in NEworks, proof of age is confirmed and the Eligibility Date is created in NEworks.

Individual is given the following:

- WIOA Services Explanation – Attachment B
- WIOA OSES Pre-Application Form – Attachment C
- Equal Opportunity Form – Attachment D
- OSES Service Guide – Attachment E
- Citizenship Attestation Form – Attachment F
- Estimated Monthly Budget Form – Attachment G
- Employability Assessment Questionnaire – Attachment H
- Follow Up Procedure & Contacts Form – Attachment I
- Applicant Statement – Attachment J

See above forms in Section 11.

Any information that is presented is scanned and verified in NEworks. If not all information is presented a partial application is saved and additional meeting(s) are scheduled. If all information needed for the application is presented the application is completed, documentation is verified and scanned and NEworks determines the eligibility.

If the individual is determined not eligible or suitable for the program a Closed Never Enrolled is entered, a referral is done and documented in case notes stating why the person is not eligible and/or suitable for the program

Once eligibility and suitability for the program have been established all eligibility information and documents **MUST** be entered into NEworks and/or scanned into ECM. A Participation Date Request form must be completed and forwarded to the Program Manager. After review the completed form will be forwarded to the Urban Development Director or his designee for participation date approval. Receipt of approval will be sent to the case manager. A participation date and date of first service can be entered into NEworks after receipt of

approval. The first service should be the Objective Assessment followed by Individual Employment Plan (IEP) development.

See Section II – Attachment J.1.

In order to assign a participation date the following directive must be adhered to:

MEMORANDUM

TO: Case Managers, Program Manager, WIOA Board Chair

FROM: David Landis

RE: A New Internal Review Method to be Implemented Upon Receipt

Our practices in compiling complete files, reviewing them and ensuring participation dates and creating enrollments is hereby modified to reflect the enclosed protocol.

Case managers will assemble complete files that satisfy the NE Works elements and has all necessary scanned documents in the ECM. Files will be reviewed weekly by the Case Managers and the Program Manager. When the Program Manager is satisfied that all necessary documents are in the file and all evidence necessary to demonstrate full compliance to external audits is in the file, the Program Manager will alert the Director, or in his absence, the Assistant Director, that the file is ready for action. The Director or Assistant Director will authorize the participation date by email to the Program Manager.

Please follow this protocol upon receipt of this email. At 4:00 p.m. 7/6/2016.

The Director's directive for assigning participation dates for participation in any WIOA activity is now policy. Per the directive all new applications that are ready for participation in WIOA will be reviewed by the Program Manager. Present the information on the application to the Program Manager as soon as it is complete. The Program Manager will review it and send an email to the Director requesting a participation date. As soon as a participation date is authorized, an email will be sent to the Case Manager at which time the participation record in NEworks can be completed and the individual can be served. In the Program Manager's absence the request will need to be sent directly to the Director or the Assistant Director in the Director's absence.

WAIT LIST POLICY ADULT & DISLOCATED WORKER PROGRAM

Purpose

To establish local policy regarding the use of a Wait List by the WIOA Service Provider should the need arise regarding enrollment of participants in the Workforce Innovation and Opportunity Act (WIOA) Adult, Dislocated Worker and Youth programs.

Policy

A Wait List will be created by the WIOA Adult and Dislocated Worker Provider should a situation develop in which enrollments need to cease in one or more of those programs. The primary cause for a Wait List would be the loss, over-expenditure, or entire obligation of program funds such that funding is not available to assist new participants. The preference is that no Wait List is created.

Procedures

I. When the WIOA Adult and Dislocated Worker Service Provider staff determines there is a need to create a Wait List, the following process will be used.

1. Documentation on the need for establishing a Wait List will be compiled by the WIOA Administrator and Urban Development Director no later than the 10th of the month prior to the month in which the Wait List would start.

2. The information will be reviewed and a plan to address the underlying issue of why a list exists and formal plan to eliminate the use of the list will be outlined.

II. When a Wait list is established, it will be the responsibility of the Service Provider to:

1. Continue taking phone, electronic and in-person referrals. Those wishing to have their name on the Wait List will provide their first and last name, address, phone number, and email contact information (as available). They will also self-identify as to their military veteran status for priority of service.

2. The Service Provider will maintain the list of names in date order by program. If self-identified as military veteran their name will be posted first. All self-identified as military veterans will be first on the list by date order that they contact the program.

3. When the Service Provider is ready to start enrolling again, the military veterans on the Wait List will be contacted fist, followed by non-veterans in the order in which they were added to the list. Contact will be made by phone and by mail or email, as available. At a minimum, at least two different types of contact attempts must be made.

4. Depending on the number of individuals on the Wait List, it may be necessary to schedule an orientation session for groups. Multiple orientation sessions may need to be scheduled depending on how many individuals are on the list.

5. The Service Provider will document on the Wait List, who responded and the result of that response, i.e. no longer interested, scheduled appointment, etc.

6. The Service Provider will keep the WIOA Administrator and the UD Director informed monthly on the status of the Wait List so information can be shared with the LWDB as needed.

7. Records regarding the Wait List will be maintained for a minimum of 3 years from the time that the Wait List ends.

GENERAL INFORMATION ON CLIENT ELIGIBILITY

Adult Program

To be eligible for the adult program the prospective client must be 18 years of age or older, authorized to work in the United States, a resident of Lancaster or Saunders County (unless otherwise approved by the OSES Program Manager), and be registered under the Military Selective Service Act if applicable. In addition, at least fifty one percent (51%) are defined as low income adults.

To be eligible for individualized career services an individual must have been determined eligible based on need. To be eligible for training services an individual must have been determined eligible based on need.

Dislocated Worker Program

To be eligible for the dislocated worker program an individual must be authorized to work in the United States, reside in Lancaster or Saunders County (unless otherwise authorized by the OSES Program Manager), and be registered under the Military Selective Service Act, if appropriate. In addition, an individual must meet categorical criteria identified by the State policy.

Displaced Homemakers may also be served under this program as long as they meet the definition described in the State policy.

Individuals who voluntarily quit their job or are terminated for reasons other than a lay-off are not eligible for the Dislocated Worker Program.

The Dislocated Worker Program does not have any income restrictions or guidelines. However, a need for the services must be documented.

General Information on Client Objective Assessment

Client assessment may be conducted under the provisions of career services. The “initial assessment” will be used to determine eligibility before the client can be assigned a participation date for program activities. Once the client has registered and been determined eligible, an “objective assessment” will be conducted as part of individualized career services to provide preliminary information regarding the individual’s basic skills, abilities, aptitudes, interests, experience, supportive service needs, and program sustainability.

The CASAS or Compass will be utilized area wide to determine basic reading and math levels. A variety of tools, such as, but not limited to, Kuder, ONET, CAPS, COPS, COPES, America’s Career Kit, and CareerScope will be utilized to determine career and job interests.

The information collected by the objective assessment will be utilized to determine if the client is able to become employed by providing additional career services such as work experience or pre-vocational skills development or determine if the client requires training services to become employed.

Under individualized career services, additional comprehensive and specialized assessments of skill levels and service needs may be made to include diagnostic testing, use of other specialized

assessment tools, and in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals.

The information collected through the objective and other assessments will be used by the service provider representative or partner to develop employment plans and establish employment goals.

General Information on Individual Employment Plan

The individual employment plan is a service strategy developed to assist adults and dislocated workers who are determined eligible to meet their employment goals.

The plan is jointly developed between the participant and service provider representative and must identify the individual services the participant will require to enable him or her to become successfully employed. It will describe appropriate achievement goals and objectives so service provider representatives are able to measure the participant's progress. This effort will assist in making decisions toward successful participant employment.

The plan will be signed by both the participant and service provider representative and will become a non-legal contract between the two parties. The plan must be a part of the participant's file.

The adult plan is referred to as the Individual Employment Plan (IEP).

General Information on Determination of Need

Federal rule requires that service providers conduct and document a determination of need for adults and dislocated workers as part of receiving individualized career or training services.

The determination of need shall be developed through a joint effort between the client and the case manager, and is a prerequisite to enrollment into individualized career services and training services and the development of the employment plan.

The determination of need should contain sufficient comments for an auditor or monitor to evaluate the reason for the determination. Comments such as low skills, unemployed for a long period of time, or lacks academic skills will not suffice. The case manager needs to provide information on how the decision was made through the use of thorough assessment, personal interview, evaluation of work history, or other evaluations, etc.

The determination of need must be maintained in the participant's case file.

See Determination of Need for Career Services Form in Section 11- Attachment K

See Determination of Need for Training Services Form in Section 11- Attachment L

PROCEDURE FOR DETERMINING ADULT ELIGIBILITY

Purpose

To provide the eligibility requirements that must be met before an Adult can be determined eligible to receive services.

Policy

Registration: Adults who receive services, other than self-service or informational activities, must be registered. Registration is the process of collecting information, including the required Equal Opportunity data, to support a determination of eligibility.

Criteria: An eligible adult is defined as an individual who:

- Is 18 years of age or older
- Is a citizen or national of the United States, lawfully admitted permanent resident alien, refugee or parolee, or other individuals authorized to work in the United States.
- Registered under the Military Selective Service Act, if appropriate.
- A resident of Lancaster or Saunders County at time of participation.
- Meets the low income guidelines, is on public assistance, or is basic skills deficient. Up to 49% of Adults do not have to meet these guidelines.

Concurrent Enrollment: Under the Act, eligible adults are defined as individuals age 18 or older and eligible youth may be 14 through 24 years of age (depending on school status). Thus, individuals age 18 through 24 may be eligible for both adult and youth programs.

Eligible individuals who are 18 through 24 years old may participate in adult and youth programs concurrently. Such individuals must be eligible under the youth and adult eligibility criteria applicable to the services received. Local program operators may determine, for individuals in this age group, the appropriate level and balance of youth and/or adult services.

See Adult Eligibility Form in Section 11 – Attachment M

PROCEDURES FOR DETERMINING DISLOCATED WORKER ELIGIBILITY

Purpose

To prescribe eligibility criteria and general conditions individuals must meet in order to become eligible for entry into the Workforce Innovation and Opportunity Act (WIOA) Title I Dislocated Worker employment and training activities.

Section 1 - *General Eligibility Criteria - Applies to All Categories*

A. Dislocated Workers who receive services funded under Title I other than self-service or informational activities must be registered and determined eligible. Registration is the process for collecting information to support a determination of eligibility. This information may be collected through methods that include electronic data transfer, personal interview, or an individual's application.

B. Equal Opportunity data must be collected on individuals during the registration process.

C. There is no specified age for the dislocated worker program.

D. There is no residency requirement for the dislocated worker program, however any individual who is a dislocated worker and does not reside in Lancaster or Saunders county should be referred to the local area of their residence. If they choose to be served in the OSES program, the OSES Program Manager should request permission from the local area of residence to serve the individual in the OSES program.

E. All participants must be registered for the Selective Service, if applicable (see Section 3 of the Military Selective Service Act [50 U.S.C. App. 453]).

F. All participants must be either citizens or nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, or parolees, or other immigrants authorized by the Department of Homeland Security to work in the United States.

G. Individuals that have entered into other employment since a termination or layoff are considered eligible if the employment is less than one continuous year and the individual is earning seventy-five percent or less of the wage paid at the time of termination or layoff. Employment over one continuous year shall be considered an occupational change.

H. Dislocated workers shall not be considered eligible for services with the same employer or in an occupation with the same requirements as the participant's previous job.

Eligibility Criteria - Dislocated Worker

To participate in the Title I employment and training programs as "eligible dislocated workers," applicants must meet the criteria of one or more of the following categories (category division in NEworks varies from the numbering below):

Part I

1. Has been terminated or laid off, or who has received a notice of termination or layoff, from employment;
    a. is eligible for or has exhausted entitlement to unemployment compensation; or

b. has been employed for a duration sufficient to demonstrate, to the appropriate entity at a one-stop center referred to in section 121(e), attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a State unemployment compensation law; and

2. is unlikely to return to a previous industry or occupation; if this is the determination used for eligibility the unlikely to return form must be filled out and scanned into ECM.

See Unlikely To Return Form in Section 11 – Attachment M.1.

Definitions for Part 1:

1. "Eligible for" unemployment compensation includes any individual whose wages from employment would be considered in determining eligibility for UI under federal or state unemployment compensation laws. Eligible for UI should not be interpreted as receiving UI, as some eligible individuals may choose not to file a claim.

2. Individuals that are terminated for cause (fired, etc.) or voluntarily quit (except in case of military discharge of non-retiree service member or military spouse as specified below) shall not be considered eligible under this category. However, individuals who are offered (in writing) the option of early retirement instead of layoff and who plan to seek new employment still meet the definition of layoff.

3. According to TEGL 22-04, it is a Department of Labor policy that being discharged (under honorable circumstances) either voluntarily or involuntarily terminates an employment relationship between an individual and the military and thus falls within the scope of the termination component of the WIA definition of dislocated worker. The separating military personnel must also satisfy the other criteria for dislocated worker eligibility, including the requirement that the individual is "unlikely to return to a previous industry or occupation."

4. Individuals are considered <u>unlikely</u> to return to previous industry/occupation if:

   a) Occupation shows a zero or negative growth rate as documented by Labor Market Information (LMI), **<u>or</u>**

   b) Employment Services confirms that in the previous sixty days there was a lack of job orders for that occupation compared to qualified job seekers, **<u>or</u>**

   c) The local Chamber of Commerce or Economic Development representative confirms that the occupation or industry has shown a significant employment decline in the local labor market area, **<u>or</u>**

   d) A plant closure or substantial layoff (within the labor market area in the same industry or occupation) has occurred in the last six months, **<u>or</u>**

   e) They have acquired a disability which affects their ability to perform previous occupation, **<u>or</u>**

f) They have been actively seeking, but unable to find employment in their previous industry or occupation for a period of ninety days or more, **or**

g) They were involuntarily or voluntarily separated from active military duty. A member of the armed forces shall be considered to be "involuntarily separated", if the member was on active duty or full-time National Guard duty on September 30, 1990, or after November 29, 1993, or, with respect to a member of the Coast Guard, if the member was on active duty in the Coast Guard after September 30, 1994, **and**

- In the case of a regular officer (other than a retired officer), the officer is involuntarily discharged under other than adverse conditions as characterized by the Secretary concerned; **or**
- In the case of a reserve officer who is on the active duty list, or if not on the active duty list, is on full-time active duty (or in the case of a member of the National Guard, full-time National Guard duty) for the purpose of organizing, administering, recruiting, instructing, or training the reserve components, the officer is involuntarily discharged or released from active duty or full-time National Guard (other than a release incident to transfer to retired status) under other than adverse conditions, as characterized by the Secretary concerned; **or**
- In the case of a regular enlisted member serving on active duty, the member is denied reenlistment, or involuntarily discharged under other than adverse conditions, as characterized by the Secretary concerned; **or**
- In the case of a reserve enlisted member who is on full-time active duty (or in the case of a member of the National Guard, full-time National Guard duty) for the purpose of organizing, administering, recruiting, instructing, or training the reserve components, the member is denied reenlistment or is involuntarily discharged or released from active duty (or full-time National Guard duty) under other than adverse conditions, as characterized by the Secretary concerned.
- The service member's DD214 should contain the information necessary to make the eligibility determination. Local representatives for boards and one-stop operators should consult with local veterans' employment representatives (LVERS) if additional information is needed to make an accurate eligibility determination. LVERS would also be helpful in determining whether the members' Military Occupational Skill (MOS) equates to a marketable civilian demand occupation.

Part II

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;

2. is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or

3. for purposes of eligibility to receive services other than training services described in section 134(c)(3), career services described in section 134(c)(2)(A)(xii), or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close.

Definitions for Part 2:

1. A public announcement of a planned closure is any document or statement, released by an official of the company, which specifies intent to close any employment site. A public announcement can be substantiated by a copy of the company document, a confirmed news/press release, or confirmed newspaper/magazine article. Confirmation must include the name and title of the company official, location of the facility, and the planned closure date. A WARN notice of planned closure may be considered a public announcement.

2. All authorized dislocated worker services may begin 180 days before the scheduled closure date.

3. Individuals that are likely to remain employed with the same employer or likely to retire instead of seeking new employment shall not be considered eligible.

4. Substantial layoff means any reduction in force which is not the result of a plant closure, and which results in an employment loss at a single site of employment during any thirty day period for at least 50 employees (excluding employees regularly working less than twenty hours per week).

5. A permanent plant closure occurs when any physical structure where business is conducted closes, or when the ability to provide service is discontinued as a result of an employer abandonment or business liquidation.

Part III

1. Was previously 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;

Definitions for Part 3:

1. Economic conditions resulting in the dislocation of a self-employed individual include, but are not limited to:

   a) Failure of one or more businesses to which the self-employed individual either supplied or obtained a substantial proportion of products or services.
   b) Permanent closure of, or substantial layoff from, one or more plants or facilities that support a significant portion of the state or local economy.

2. Categories of natural disasters include, but are not limited to, storm, tornado, flood, high water, wind-driven water, earthquake, volcanic eruption, landslide, mudslide, drought, fire, or explosion.

3. Categories of self-employed individuals are identified as farmers, ranchers, professionals, independent trades-people or other businesspersons who were self-employed and are presently unemployed, or are in the process of going out of business, as evidenced by one or more of the following events or circumstances:

a) Issuance of a notice of foreclosure or intent to foreclose.
b) Failure of the farm, ranch, or business to return a profit during the preceding 12 months.
c) Entry of the self-employed individual into bankruptcy proceedings.
d) Inability to make payments on loans secured by tangible business assets.
e) Inability to obtain capital necessary to continue operations.
f) Debt-to-asset ratio sufficiently high to be indicative of the likely insolvency of the farm, ranch, or business.
g) Other events indicative of the likely insolvency of the farm, ranch, or business.

4. Family members and farm/ranch hands of individuals identified above are eligible for program services, provided this was their primary employment and they are dislocated as a result of the permanent dissolution of the farm, ranch, or business.

Part IV

1. Is a displaced homemaker;

Displaced Homemaker – WIOA section 3(16) defines "displaced homemaker" as an individual who has been providing unpaid services to family members in the home and who:

- Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment; and either
  - Has been dependent on the income of another family member but is no longer supported by that income; or
  - Is the dependent spouse of a member of the Armed Forces on active duty1 and whose family income is significantly reduced because of
    i. A deployment;
    ii. A call or order to active duty pursuant to a provision of law referred to in section 101(a)(13)(B) of title 10, United States Code;
    iii. A permanent change of station; or
    iv. The service-connected death or disability of the member

Part V

1. Is the spouse of a member of the Armed Forces on active duty and who has experiences a loss of employment as a direct result of relocation to accommodate a permanent change in duty state of such member; or

2. Is the spouse of a member of the Armed Forces on active duty and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

See DLW Eligibility Form in Section 11 – Attachment N

PROCEDURE FOR DETERMINING A LOW INCOME INDIVIDUAL

Purpose

To identify the requirements for being considered a low income individual for WIOA Adult services.

Policy

A low income individual is defined as meeting at least one of the following criteria:

- Receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the program of block grants to States for temporary assistance for needy families program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the supplemental security income established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.) or State or local income-based public assistance;

- Is in a family with total family income that does not exceed the higher of (in the six months prior to the registration date):
    - The poverty line, for an equivalent period; or
    - 70 percent of the lower living standard income level, for an equivalent period (see income chart at the end of this policy to determine appropriate income levels that incorporate these two criteria).

- 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. 11434a(2)));

- 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.);

- Is a foster child on behalf of whom state or local government payments are made; or

- Is an individual with a disability whose income meets the income requirement of (2), but who is a member of a family whose income does not meet this requirement.

PROCEDURES FOR RELEASE OF CONFIDENTIAL INFORMATION

Purpose

To establish the process and requirements for the release of confidential client information.

Policy

General Release of Confidential Information Form: State educational authority may disclose student social security numbers to a State UI agency (or other agency that has access to State UI wage records) for the purpose of determining employment status. Local areas must gain a signed client release of information from every participant enrolled in training at a postsecondary institution as of May 1, 2003 and thereafter (FERPA).

See FERPA in Section 11 – Attachment O

The statement on release of confidential information is located on the bottom of the WIOA OSES Pre-Application form and allows the WIOA Service Provider to release information to other agencies when services of the agency have been requested, or when the objective in obtaining the information is to provide services to the client.

PROCEDURE FOR DETERMINING A BASIC SKILLS DEFICIENT INDIVIDUAL

Purpose

To identify the requirements for being considered a basic skills deficient individual for WIOA Adult.

Policy

WIOA section 3(5) defines “basic skills deficient” as an individual:

- Who is an adult that 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.

GENERAL INFORMATION ON CLIENT ELIGIBILITY & BEST PRACTICES

1. Having an active worker's compensation case does not have any effect on a client's eligibility. However, it is important to discuss if the client has any limitations on where they can work and what tasks they may perform.

2. Given the nature of substitute teaching, working as a substitute teacher for multiple years is not considered a year of continuous employment (when considering eligibility as a dislocated worker).

3. Generally, the amount of time between a client's layoff and how long they worked for the employer has no effect on eligibility. The exception being that attachment to the employer needs to be shown so the client needed to be employed a minimum of 6 weeks prior to the layoff to meet the Category 1 definition.

4. Case Managers have 90 days to assign a Participation Date and enter a client into a program (Adult and DLW) after the client is given an Application/Registration Date.

GENERAL INFORMATION ON CLIENT ELIGIBILITY RESOURCES

Forms

The following forms are **required** to be used when determining client eligibility:

- **WIOA Application and Registration Form**
- **Employability Assessment Questionnaire**
- **Eligibility Verification Checklist**
- **Projected Budget Summary Form**
- **Determination of Need Form**

The following forms **may be used,** when applicable, to assist in verifying eligibility criteria:

- **Release of Confidential Information Form**
- **Telephone Verification Form**
- **Applicant Self Attestation Statement**
- **Release of Unemployment Insurance Information**
- **Referral Sheet**

See Telephone Verification Form in Section 11 – Attachment O.1

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 4

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

Services

PROCEDURE FOR CAREER SERVICES

Purpose

To identify career services (basic and individualized) available to individuals seeking employment. Career services are the initial step in providing clients with workforce development activities that will lead to unsubsidized employment

Policy

Registration: The NEworks system shall be the data access system used for collecting information on career services provided.

Each client must be registered in NEworks to receive a career service, other than self-service or informational activities. There are three types of career services: basic career services, individualized career services, and follow-up services. These services can be provided in any order; there is no sequence requirement for these services. Activities under career services include the following:

1. Self-service and informational activities are those career services that are made available and accessible to the general public, 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 situation, and that do not require significant staff involvement with the individual in terms of resources or time." [20 CFR 666.140(a)(2)]
2. Basic Career Services must be made available to all individuals seeking services served in the one-stop delivery system.
3. Individualized Career Services are designed to impart job seeking and/or occupational skills. There is significant staff involvement in terms of resources or time and individuals receiving these services are registered and count in the performance of the funding program.
4. Follow up Services must be provided as appropriate for participants who are placed in unsubsidized employment for up to 12 months after the first day of employment.

The State and Local Workforce Development Boards shall be able to evaluate and make decisions based on data reported through this statewide system.

All partners on NEworks must:

- Decide on which career services to provide and the timing of their delivery. These decisions shall be made on a case-by-case basis at the local level depending upon the needs of the participant. However, it is important for every partner to track each event as it occurs.

Basic Career Services:

Generally there are no special eligibility requirements for participation by adults in Basic Career Services.

1. Determination of whether the individual is eligible to receive assistance under one or more partner programs.

2. Outreach, intake (which may include worker profiling), and orientation to the information and other services available through the one-stop delivery system

3. Initial Assessment-- A preliminary evaluation of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities (including skills gaps), and supportive service needs.

4. Labor Exchange Services including:

   a. Job search and placement assistance and, in appropriate cases, career counseling, including

      i. provision of information on in-demand industry sectors and occupations; and

      ii. provision of information on nontraditional employment and;

   b. Appropriate recruitment and other business services on behalf of employers, including small employers, in the local area, which services may include services described in this subsection, such as providing information and referral to specialized business services not traditionally offered through the one-stop delivery system.

5. Provision of referrals to and coordination of activities with other programs and services, including programs and services within the one-stop delivery system and, in appropriate cases, other workforce development programs.

6. Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including—

   a. Job vacancy listings in such labor market areas;

   b. Information on job skills necessary to obtain the jobs described in (i); and

   c. Information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for such occupations:

7. Eligible Training Provider Information Access-- Provision of performance information and program cost information on eligible providers of training services as described in Section 122, provided by program, and eligible providers of youth workforce development activities described in Section 123, providers of adult education described in Title II, providers of career and technical education activities at the postsecondary level and career and technical education activities available to school dropouts under the Carl D. Perkins Career

and Technical Education Act of 2006, and providers of vocational rehabilitation services described in Title I of the Rehabilitation Act of 1973.

8. Local Area Performance Information—Provision of information, in formats that are usable by and understandable to one-stop customers regarding how the local area is performing on the local performance accountability measures and any additional performance information with respect to the one-stop delivery system in the local area.

9. Supportive Services Information—Provision of information, in formats that are usable by and understandable to one-stop center customers, relating to the availability of supportive services or assistance, including:

    a. Childcare, child support, medical or child health assistance under title XIX or XXI of the Social Security Act (42 U.S.C. 1396 et seq. and 1397aa et seq.);

    b. Benefits under the supplemental nutrition assistance program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.);

    c. Assistance through the earned income tax credit under section 32 of the Internal Revenue Code of 1986

    d. Assistance under a State program for temporary assistance for needy families funded under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.); and

    e. Other supportive services and transportation provided through funds made available under such part, available in the local area;

10. Referral to the services or assistance described in item 9 as appropriate;

11. Provision of information and assistance regarding filing claims for unemployment compensation;

12. Assistance in establishing eligibility for programs of financial aid assistance for training and education programs that are not funded under WIOA;

Individual Career Services:

PROCEDURE FOR INDIVIDUAL CAREER SERVICES

Purpose

To identify individualized career services and establish the program requirements that must be met before these services may be provided.

Policy

Eligibility: Clients must meet the eligibility criteria specified by the One Stop Employment Solutions on program eligibility, be registered for program services, and be assigned a program participation date. At least 51% of the adults will meet one of the following priorities:

- Be a recipient of public assistance (within the six months prior to registration)
- Be a low-income individual (as previously defined)
- Be an individual who is basic skills deficient (as previously defined)

The Greater Lincoln Local Plan defines self-sufficiency as:

Adults: The Greater Lincoln Board defines self-sufficiency for Adults as wages that are 175 percent of the Lower Living Standard Income Level.

Dislocated Workers: Earning a wage which is equal to at least the minimum Median Earnings set in the program year performance standards. Self-sufficiency for dislocated workers is defined as 80 percent or more of wages earned.

Delivery of Individualized Career Services: Individualized career services will be provided through the One Stop Employment Solutions program.

Requirement for Training Services: Each participant will be reviewed on an individual basis for their need for training services. There is no requirement for a participant's participation in career services before they can receive training services.

If the participant has been determined to be in need of training services, the individual's case file must contain the determination of need, the individual employment plan, the results of the objective assessment/evaluation, and documentation supporting the relation to an in-demand occupation

Individual Career Services:

Any Individual Career Services provided must give priority to recipients of public assistance, other low-income individuals, and the individuals who are basic skills deficient. Any determination that establishes the need for individualized career services must be documented and maintained in the participant's case file.

Eligibility: Clients must meet the eligibility criteria specified by the One Stop Employment Solutions on program eligibility, be registered for program services, and be assigned a program participation date. At least 51% of the adults will meet one of the following priorities:

- Be a recipient of public assistance (within the six months prior to registration)
- Be a low-income individual (as previously defined)
- Be an individual who is basic skills deficient (as previously defined)

The Greater Lincoln Local Plan defines self-sufficiency as:

Adults: The Greater Lincoln Board defines self-sufficiency for Adults as wages that are 175 percent of the Lower Living Standard Income Level.

Dislocated Workers: Earning a wage which is equal to at least the minimum Median Earnings set in the program year performance standards. Self-sufficiency for dislocated workers is defined as 80 percent or more of wages earned.

Delivery of Individualized Career Services: Individualized career services will be provided through the One Stop Employment Solutions program. Individualized Career services available may include:

1. Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers which may include:
    a. Diagnostic testing and use of other assessment tools; and
    b. In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;

2. Development of a an individual employment plan to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals;

3. Group counseling;

4. Individual counseling;

5. Career planning;

6. Short-term prevocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct;

7. Internships and work experiences that are linked to careers;

8. Workforce preparation activities;

9. Financial literacy services

10. Out-of-area job search assistance and relocation assistance; or

    See Out of Area Job Search Assistant Form in Section 11 – Attachment P

    See Relocation Assistance Form in Section 11 – Attachment Q

11. English language acquisition and integrated education and training programs; and

12. Follow-up services, including counseling regarding the workplace, for participants in workforce development activities who are placed in unsubsidized employment, for not less than 12 months after the first day of employment, as appropriate.

PROCEDURE FOR OBJECTIVE ASSESSMENT

Purpose

To establish the process and requirements to determine eligibility for WIOA programs, and the development of Individual Employment Plans and Individual Service Strategies.

Policy

Objective Assessment: An objective assessment under intensive services will be conducted on each individual upon enrollment in WIOA. The assessment may include such options as structured interviews, paper-pencil tests, performance test, behavioral observations, personal interests and inventories, career guidance instruments, aptitude and basic skill tests, and evaluation of employment experience. **The objective assessment will build upon the data collected during the initial assessment.**

The service provider may select the most appropriate assessment tool(s) to measure basic skills, abilities, aptitudes, and interest, and to advise participants on how their assessment results relate to their employment goals and local labor market demands. However, since the results of the assessment of reading and math skills are collected by the participant data collection system, the assessment tool/method utilized to assess these skills must be standardized in order to produce information that presents an accurate and consistent reflection of reading and math skills across the entire Greater Lincoln Area. All other assessment tools/methods should be standardized as much as possible.

The objective assessment is an examination of the participant's needs and vocational potential. It must be client centered, flexible and the assessment process shall be sensitive to the testing and evaluation environment and to the comfort and confidence level of the participant. The results of the objective assessment provide the necessary information for the development of an employment plan or strategy that identifies realistic and obtainable employment goals.

The assessment is an ongoing process, and may be updated and amended as specific goals are achieved or as additional needs are identified. In addition, the following individual employment barriers shall be evaluated prior to the development of an employment plan or service strategy:

- Family situation
- Employment history
- Education
- Basic and occupational skills
- Interests
- Aptitudes (including interests and aptitudes for non-traditional employment)
- Attitude toward work
- Motivation
- Behavior patterns affecting employment patterns
- Financial resources and needs
- Support service needs
- Personal employment information as it relates to the local labor market

The process provides information necessary to establish objective and attainable employment goals and strategies and to determine if the participant has the ability, aptitude, or motivation to enter and successfully complete a program of training.

PROCEDURE FOR INDIVIDUAL EMPLOYMENT PLAN (IEP)

Purpose

To ensure that each participant enrolled in the WIOA Programs outlines the individual goals and objectives that must be accomplished in order for the participant to become employed.

Policy

Individual Employment Plan: The individual employment plan (IEP) is an ongoing strategy jointly developed by the participant and the Case manager which identifies the participant's employment goal, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goal.

Development Criteria: An individual employment plan will be developed on each participant who receives individualized career services, beyond the objective assessment/evaluation, or is determined to need training services. The plan shall be jointly developed between the Case manager and the participant utilizing the results of the assessment/evaluation. The plan is an ongoing strategy and should be revised or amended at any time based upon the identification of additional services needed to complete the participant's employment goals. At a minimum, the IEP is to be reviewed by the Case manager with the participant, at least once every 90 days.

The plan, at a minimum, must identify the participant's barriers, employment goal(s) and relationship to in-demand occupations, the appropriate achievement objectives, and the combination of services needed to attain the employment goal(s) and must be signed by both the participant and the Case manager.

Documentation: A copy of the employment plan shall be maintained in the participant's file and should be accompanied by the "Determination of Need" prepared in accordance with the One Stop Employment Solutions procedures.

Standards: Standards for completion have been developed and are located at the end of this section.

PROCEDURE FOR DETERMINATION OF NEED

Purpose

To establish a local procedure to determine and document a client's need for individualized career services or training services.

Policy

Method of Determination: A determination of the need for individualized career services or training services must be conducted on each eligible client before they may receive such services.

Individualized Career Services: The determination of need will be established by an initial assessment or by the client's inability to obtain employment through the provisions of individualized career services authorized by WIOA.

Training Services: The determination of need will be established by ensuring the client has met the eligibility requirements for training services as authorized by WIOA and has been determined to be unable to obtain or retain employment through further individualized career services.

OR

After an interview, evaluation, or assessment and case management, the eligible client is determined to be in need of training services, and has the skills and qualifications to successfully complete a selected training program.

The determination of need shall be developed through joint efforts between the client and case manager, and be a part of the development of the employment plan. The determination of need document must be maintained in the client's case file.

PROCEDURE FOR CASE MANAGEMENT

Purpose

To provide policy regarding case management to ensure Workforce Innovation and Opportunity Act (WIOA) program participants receive services that are client-centered and participant involvement is maximized.

Policy

Case Management: Case management means the service provider must provide a client-centered approach in the delivery of WIOA services. Case management is the overall process engaged in with the participant and is designed to:

- To prepare and coordinate comprehensive participant employment plans and services, strategies to ensure access to necessary program activities and supportive services, and using, where feasible, computer-based technologies to conduct case management.

- To monitor the progress of each participant as related to the achievement of employment goals and objectives, and identify additional service needs required by the participant in order to achieve such goals and objectives.

- To provide job and career guidance during participation in the program and after job placement.

Service Requirements: **Case managers shall document the delivery of all active services in the case file at least once every 30 days.** Documentation of service may include case notes, transcripts, purchase requests, etc. as applicable to the service being provided.

Participants should be contacted at least once every 30 days and a documented service provided at least once every 90 days. If a contact cannot be provided every 30 days, the Case manager should document why s/he is unable to do so. If the Case manager is not able to provide a service at least once every 90 days, a request to the OSES Program Manager for a formal gap in service will need to be requested or the individual closed out from the program if no other services are applicable. The goal of case management is to provide regular contact and assistance in order to help participants achieve their training and employment goals. If the Case manager is having difficulty contacting a participant, s/he should close the last activity within 30 days of that LDOS. If continuing to reach the participant, documentation of multiple methods of contact attempts should be recorded in case notes.

The following is the State policy on Case Management (revised 8-13-2012) and summarizes the majority of services provided to WIA/WIOA participants. “Case management is not a stand-alone activity but rather a continual service provided to adult, dislocated workers to ensure their success.” These services are explained in further detail in policies located throughout this Operations Manual. All statements made in the text below correspond to language in all other Operations Manual policies.

> Initial Assessment for Eligibility: “The initial assessment provides preliminary information about the individual’s skill levels, aptitudes, interests, and supportive service needs.”

As a basic career service, the initial assessment is intended to be a brief, preliminary information gathering process that, among other things, provides sufficient information about an individual's basic literacy and occupational skill levels to enable the service provider to make appropriate referrals to services available through the One-Stop American Job Center and partner programs.

When choosing who shall be participants in the Title I programs, refer to the "Eligibility for Adult Programs" policy, and the "Eligibility for Dislocated Workers" policy. In addition, special care must be exercised to not discriminate on the basis of race, color, national origin, sex, age, disability, religion, political affiliation or belief, participant status, and against certain noncitizens. Refer to the "Equal Opportunity and Nondiscrimination" policy in regard to providing reasonable accommodations to qualified individuals with disabilities who are applicants.

Registration: Registration is the process for collecting information to support a determination of eligibility. This information may be collected through methods that include electronic data transfer, personal interview, or an individual's application.

"Following a determination of eligibility, participation in a program commences when the individual begins receiving a service funded by the program in either a physical location (American Job Center) or remotely through electronic technologies. This phrase has the same meaning as the 'Date of Participation' used in some of the measures." It counts as the official point when the participant begins counting in performance measures. [TEGL 28-04 and Application Time Limit policy]

In Greater Lincoln Area, there is a limit of 90 days for validity of an application as it relates to eligibility. If over 90 days elapse between the NEworks Application Date and the NEworks Participation Date, then it is necessary to go back and re-verify all of the information and update the application date prior to participation. [Application Time Limit policy]

"Equal Opportunity (EO) data must be collected on every individual who is interested in being considered for WIOA Title I financially assisted aid, benefits, services, or training by a recipient, and who has signified that interest by submitting personal information in response to a request from the recipient."

Comprehensive/Objective Assessment: Comprehensive assessment is a detailed examination of issues affecting the participant and may explore any number of things relevant to the development of a person's individual employment plan (IEP). These might include some combination or all of the following: educational attainment; employment history; more in-depth information about basic literacy and occupational skill levels; interests; aptitudes; family and financial situation; emotional and physical health, including disabilities; attitudes toward work; motivation; and supportive service needs.

In the preamble, local areas are directed to "take into account any special assessment needs that may be experienced by individuals with disabilities and other populations with multiple barriers to employment."

A new assessment of a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent assessment of the participant conducted pursuant to another education or training program.

Supportive Services: The term “supportive services” means services such as transportation, child care, dependent care, housing, and needs-related payments that are necessary to enable an individual to participate in activities authorized under WIOA Title I.

To ensure flexibility, the regulations afford local areas the discretion to provide supportive services as they deem appropriate with limitations only as defined in the Act.

Supportive services may only be provided to adults and dislocated workers who are: (1) participating in individualized career or training services; and (2) unable to obtain supportive services through other programs providing such services. Supportive services may only be provided when they are necessary to enable individuals to participate in Title I activities.

The Greater Lincoln Board, in consultation with the One-Stop Employment Solutions Program and other community service providers, has developed a policy on supportive services that ensures resource and service coordination in the local area. The policy addresses procedures for referral to such services, including how such services will be funded when they are not otherwise available from other sources.

Training Decisions for Adults and Dislocated Workers: After an interview, evaluation, or assessment, before deciding on training, the Case manager must ask these questions:

1. Has the participant met the qualifications to be eligible for training services and been determined to be unable to obtain or retain employment?

2. Does the participant have the skills and qualifications to successfully complete the selected training program?

3. Is the program of training services directly linked to the employment opportunities either in the local area or in another area to which the individual is willing to relocate?

4. Is there another funding source willing to pay the costs of the training, including such sources as State-funded training funds, Trade Adjustment Assistance and Federal Pell Grants?

5. If funding is limited in the local area, does the adult participant meet the priority requirements given to recipients of public assistance, other low-income individuals, or being basic skills deficient?

Selection by participants of eligible providers is made in consultation with the Case manager. [Refer to Eligible Training Provider and Individual Training Account policies.]

Exits: Everyone who has a participation date in NEworks shall have a closure activity completed when they are finished receiving WIOA-funded or (optional) partner-funded services and are not scheduled for future services. The closure is initially subject to change for 90 consecutive calendar days, at which time if no further services have been received, it becomes an official exit. Every participant receiving an exit shall be counted in performance with the exception of participants in the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter:

- institutionalized;
- deceased;

- health/medical;
- family care;
- reservists called to active duty who choose not to return to WIOA.

[For more detailed information, refer to the NDOL "Program Exit" policy.]

Follow-Up/Post Placement Contact: Celebrate successes of participants!

The provision of training and supportive services after entry into unsubsidized employment ("post-placement") shall be limited, and shall be part of the IEP, clearly documented in the participant case file. Such post-placement training and supportive services may be provided consistent with policies established by the State or Local Board, and determined to be necessary on an individual basis by the Service Provider.

Documentation: "The case file must contain a determination of need for training services and be identified in the individual employment plan.

Each person in individualized career services must have an electronic case management file. "A determination of the need for individualized career services must be contained in the participant's case file."

"For registered participants, a standardized record that includes appropriate performance information must be maintained.

BEST PRACTICES

Planned WIOA Outcomes

Standards for Completion

- Specific and directly linked to participant's challenges to achieving employment goal
- Consistent with services listed in the IEP
- Identify occupational skill and unsubsidized employment goals as appropriate

Employment Plan Strategy

Standards for Completion

- Utilize as a snapshot-originally written as a projection of services and updated as needed
- Should list steps in sequential order-steps should be no more than one sentence long.
- Should include details such as service provider names, types of training, employer names.
- Should include timelines or dates.
- Dates should be included when there is a revision to the strategy (see 'reasons for revision below).
- Do NOT note progress notes for each step on the IEP. Detailed information should be in case notes.
- Consistent with services listed in the remainder of the IEP.

Service Inventory

Standards for Completion

- The first Service should ALWAYS be Objective Assessment followed by Assessment/IEP Development.
- All services should have a corresponding NEworks Activity
- All services should include documentation of dates assigned AND all such dates should correspond to the dates entered in NEworks.
- Case notes should be recorded at least once every 30 days and documentation provided for each active service at least once every 90 days. Each case note should be dated.
- Do NOT enter case notes on IEP's.

Miscellaneous

If a Case Manager who is not assigned to that participant makes an update to the ISS, they must so note in the NEworks case notes.

Reasons to revise (requires a new signature by participant and the Case Manager)

- Addition or Removal of Planned Service
- Change in goals

PROCEDURE FOR WORK EXPERIENCE

Purpose

To provide guidance for participants participating in a Work Based Learning activity.

Policy

Definition: A **Work Experience (WE)** activity is a planned, structured learning experience in a work place for a limited period of time (90 days or less). Work experience may be a paid or unpaid activity, and may take place in a private for profit sector, the private non-profit sector, or the public sector. Work experience would be an effective program for individuals who have a disability, limited or no work history, or sporadic work history. Its purpose is to provide short-term, part-time work for a participant who needs assistance in becoming accustomed to basic work requirements.

Work experience is designed for individuals who have never worked, have very limited work experience, or have been out of the labor force for an extended period of time. WE is intended to allow clients to develop, learn, and practice good work habits and basic work skills. Individuals with an adequate work history or dislocated workers would not normally need a work experience.

Internships are also a planned, structured learning experience in a work place for a limited period of time (90 days or less). Internships may be paid or unpaid, and may take place in a private for profit sector, the private non-profit sector, or the public sector. Internships allow an individual to put into practice learning from training they have received. **Pre-apprenticeships Apprenticeships On-the-Job Training**

Allowable Programs: WE is considered a viable activity for Adults clients who meet the above definition. WE services may only be authorized for Dislocated Workers by the OSES Program Manager with justification as to why WE services are necessary. WE is not considered a viable activity for Dislocated Workers, except displaced homemakers.

WE is considered a viable activity for Displaced Homemaker and may be approved by the service provider staff. Internships, Pre-apprenticeships, Apprenticeships, and On-the-Job Training are allowable for all program areas depending on need.

Limitations: WIOA clients are limited to 500 total hours of work experience during their entire enrollment in the program. The OSES Program Manager may increase this total to a maximum of 750 hours under exceptional circumstances.

WE Requirement: Work experience must to be linked to academic learning.

Worksite Agreement: Once a worksite is selected, the Case manager or Business Outreach Specialist/Coordinator will complete a Worksite Agreement with the worksite supervisor and provide an orientation of the program. The orientation will include at a minimum, WE timesheets, instructions on its use and timelines for submission. The original copy of the Worksite Agreement will be maintained in the client file and the worksite will retain a copy.

Client Orientation: The participant will be provided an orientation of the worksite including work rules or policies, and the WE payroll system. The participant must complete a W-4 and I-9 forms (and a SAVE verification if applicable) which will be maintained in the participant's file.

PROCEDURE FOR TUTORING AND JOB COACHING SERVICES

Purpose

To provide guidance on Tutoring and Job Coaching procurement procedures.

Policy

Above reference gives priority of services to authorized service providers if they are located within the local service area. Only in those cases that a local authorized service provider or providers is/are unavailable in your area or unable to provide the requested service may the following procedures be used.

One Stop Employment Services recognizes client services, such as tutoring & job coaching for WIOA clients, are not always available from Authorized Service Providers in all locations within the Greater Lincoln Workforce Development Area. Therefore, the following policy will be used to procure those services for WIOA clients in the absence of local Authorized Service Providers.

- Tutoring services for Adults & Dislocated Workers (DLW) may only be approved for participants enrolled in an individualized career or training activity.

- Job coaching services may only be approved for participants in a work experience activity or newly hired position. Job Coaching services for DLWs, except Displaced Homemakers, will require prior approval from the OSES Program Manager. Job Coaching services would not normally be associated with an On-the-Job Training or Apprenticeship as this should be provided by the employer under their training responsibilities.

- Tutoring for Adults and DLW and all job coaching are considered supportive services and must comply with the One Stop Employment Services Supportive Service policy.

- A service provider file must be maintained on all individuals or entities who are not local area approved service providers.

- Tutoring or job coaching services will be procured using separate financial documents for each client.

- Tutoring services will be procured for no more than 30 days at a time and at a negotiated cost between $15.00 and $25.00 per hour, not to exceed 10 hours per week. The OSES Program Manager may approve tutoring services at a cost up to $35 per hour and in excess of 10 hours per week under exceptional circumstances by contacting the OSES Program Manager. Justification of circumstances must be documented in the case file.

- Job Coaching services are limited to a total of 20 hours at a negotiated cost between $10.00 and $20.00 per hour. The service provider's Director of Workforce Services may approve job coaching services up to $30.00 per hour and up to a total of 30 hours under exceptional circumstances, which must be documented in the case file. Any services above established limits must have prior OSES Program Manager approval.

INDIVIDUAL CAREER SERVICES RESOURCES

Forms

The following forms are **required** to be used when delivering individualized career services:

- **Individual Employment Plan**
- **Objective Assessment**
- **Case Notes**

The following forms **may be used,** when applicable, in delivering individualized career services:

- **Projected Budget Summary**

Approvals

Approvals are required for the following actions related to the delivery of intensive services:

Action	Required Documents	Approval
Exceed 500 hours for Total Work Experience	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the current circumstances and; Proposed amount of hours and timeline.	OSES Program Manager
Exceed Tutoring Fee of $25/hour (up to max $35/hr)	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the current circumstances and; Proposed hourly rate.	OSES Program Manager
Exceed 10 hrs/week of Tutoring	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the current circumstances and; Proposed number of hours per week.	OSES Program Manager
Exceed Job Coaching Fee of $20/hour (up to $30/hr)	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the current circumstances and; Proposed hourly rate.	OSES Program Manager
Exceed 20 hrs/week of Job Coaching (up to 30 hrs/week)	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the current circumstances and; Proposed number of hours per week	OSES Program Manager

TRAINING SERVICES

GENERAL INFORMATION ON TRAINING SERVICES, INDIVIDUAL TRAINING ACCOUNTS & ELIGIBLE TRAINING PROVIDERS

General Information on Training Services

Training services are provided to participants who have been determined eligible, have been assessed through the Objective Assessment, and shown need that to find employment, some academic skills training or occupational skill training is needed. Training services must be provided by training providers approved by the State. The program of training may vary in length and the primary programs include occupational skills training (classroom training), on the job training, job readiness training, skill upgrade training/re-training, incumbent worker training, and adult education and literacy skills training. These programs should lead to Certificates of Completion, Associate Degree, Bachelor Degree or some other record of completion, which would identify the type of training provided in order to assist the client in achieving their employment goal in an in-demand occupation.

All adult and dislocated workers who receive training services funded by programs under the Workforce Innovation and Opportunity Act (WIOA) must have an Individual Training Account (ITA) established on their behalf. The only exceptions to this rule are On-the-Job Training (OJT), customized training projects, incumbent worker training, and training programs of demonstrated effectiveness that serve special populations who face multiple barriers to employment. The maximum cost allowed for training of more than six months is $10,000. The maximum allowed for training of six months or less is $3,500. Training services provided under an ITA must be for an in-demand occupation. This is currently defined as an occupation that is supported on the State's H3 list (h3.ne.gov/H3), is an apprenticeship, or meets the definition as a "green" occupation as noted on the State's NElearn/H3(h3.ne.gov/H3) posting. Exceptions are not allowed. Detailed information on the Individual Training Account may be obtained from the ITA policy.

Coordination with other funding sources such as Pell Grants, scholarships, vocational rehabilitation, vocational education, veterans' programs, and Health and Human Services should take place to ensure that WIOA funds are maximized and leveraged to the fullest extent possible.

General Information on Classroom Training

Classroom training may be provided to participants who need additional academic skill or occupational skill training to enable them to gain unsubsidized employment.

The training may be provided through a four-year college system, community college, private sector training providers, or other training provider as appropriate. All training providers must be approved by the State before they can conduct training services funded under the WIOA. The majority of classroom training will take place within the Community College system since there are time and cost limitations imposed upon delivery of training services. In addition, Greater Omaha has an Accreditation Policy which must be adhered to in order to spend WIOA funds on a participant.

Enrollment into classroom training will require consultation between the service provider representative and the participant. In most instances, the participant will want to attend a Community College program to obtain an Associate Degree in a field of study. However, in some cases the participant may be eager to enter employment and may only desire the vocational aspect

of the field of study, which usually can be completed within one-year and the client graduates with a Certification of Completion instead of an Associate Degree. Classroom training may also be utilized to provide services to upgrade or refresh academic or occupational skills.

Key to developing a training plan is the establishment of a career pathway. The use of stackable credentials is highly encouraged as a means to help the participant work toward achieving his/her goals.

Classroom training is one of the more important programs which contribute to the effectiveness of any workforce development or job training effort. Successful completion of classroom training usually results in higher wages and longer terms of employment for the client upon graduation or completion.

General Information for On-the-Job-Training

The On–the–Job Training (OJT) program is a training service provided by an employer in the public, private, or private non-profit sectors to a paid participant while engaged in productive work. To provide such service a contract must be developed between the service provider and the employer who is providing the training service.

As a result of the extraordinary employer costs for providing training, additional supervision, and a promise to continue employing the participant upon successful completion of training, an employer may be reimbursed for up to seventy-five percent (75%) of the client's wages during training (effective 7-1-15 with the implementation of WIOA) based on employer size as defined in the OJT Policy. The standard reimbursement rate will be up to 50 percent of extraordinary costs. The reimbursement may be increased up to 75% by the Governor (with respect to a program carried out with funds reserved by the state) or based on the following criteria set by the local board:

- The characteristics of the participants taking into consideration whether they are "individuals with barriers to employment" as defined by WIOA Section 3(24); and
- The size of the employer (must be 200 or fewer employees); and
- The quality of the employer-provided training and advancement opportunities.

The State has established that the length of time for an OJT shall be based on "the skill gap assessment, and is limited to a maximum of six (6) months or 1,040 hours of work, whichever comes first. Skill gap occurs where there is a gap between the skills of the individual and the skills needed for the targeted job. A worksheet has been developed and should be used when determining the amount of reimbursement."

Clients enrolled in an OJT program may be concurrently enrolled in an academic training program to improve academic skills. However, unless it is the employer's normal practice to pay wages to employees during academic skill training, the time may not be reimbursed.

The establishment of an OJT contract requires the service provider to conduct a pre-award review, ensure employers sign contract conditions form, develop a training outline, monitor and document progress of the client on a periodic basis, and comply with all other provisions of local and state rule.

A spreadsheet has been developed to assist in the determining the length of the OJT.

See the Length of OJT Determination Form in Section 11 – Attachment Q.1

General Information on Apprenticeships

Apprenticeship programs provide an effective and time-honored way to build a skilled, knowledgeable, and loyal workforce. The longevity of the apprenticeship program as a system of training may be attributed to many things including quality, adaptability, and a reputation for opening doors to lifetime careers.

The U.S. registered apprenticeship system offers many opportunities to meet Nebraska's Workforce Development System Strategic Goals as identified in the State Strategic Plan. Apprenticeship programs are sponsored and operated on a voluntary basis by individual employers, employer associations, or partnerships between employers and labor unions. Educational agencies are often involved with the classroom training aspects and WIOA funding may be used to pay for books, tools, etc. Apprenticeship programs are different from many training programs because the participant signs a written agreement upon entering the apprenticeship program and becomes an employee. Usually the wage scale begins at 40%-50% of the experienced skilled worker rate and increases progressively with satisfactory completion of work assignments and training segments. Near the end of the apprenticeship term, pay may range from 85%-95% of the full journeyperson's rate.

General Information on Individual Training Accounts

The individual training account is developed in joint consultation between the participant and service provider representative so the client may purchase training services or activities from approved training providers.

- An individual training account must be developed for all adults, dislocated workers, and youth who are enrolled in adult programs (youth enrolled in youth programs are not eligible). The account may be established for a participant who has been determined eligible, has received at least one intensive service, and is currently enrolled or will be enrolled in a program of training.

- Limitations applied to the individual training account include a cost limitation of $10,000 and a time limitation requiring the client to complete the program as a whole in 30 months or less. These limitations may be extended with the approval of the OSES Program Manager.

- The individual training account may cover the cost of tuition, fees, books, and supplies. Supportive service costs are excluded as a part of the training costs.

- The individual training account form will be utilized. The form will identify all costs associated with the program of training by the individual period of training such as a semester, trimester, or other periods of training. Attachments to identify the periods of training are acceptable. The individual training account form and its attachments, if applicable, will be maintained in the participant’s file.

General Information on Eligible Training Providers

The State policy for eligible training providers prescribes eligibility criteria and general conditions training providers must meet in order to become certified as an eligible provider to receive adult and dislocated worker funds through Individual Training Accounts.

A list of the approved training providers and courses of study for the state is listed on the Nebraska Department of Labor web site.

PROCEDURE FOR TRAINING SERVICES

Purpose

To provide general direction in providing training services to adults and dislocated workers, including displaced homemakers.

Policy

Training Services: Training services may be made available to employed and unemployed adults and dislocated workers (including displaced homemakers) who have met the eligibility requirements as follows:

- Be unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services; or

- Be in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and

- Have the skills and qualifications necessary to successfully participate in the selected program of training services; and

- The training program is directly linked to employment opportunities in the local area or planning region, or in another area to which the participant is willing to relocate upon completion of training. This will be documented through the Demand Occupation process; and

- Are unable to obtain other grant assistance for such services, including Federal Pell Grants or require assistance beyond the assistance made available under other grant assistance programs, including Federal Pell Grants.

Use of Previous Assessment – A one-stop operator or one-stop partner is not required to conduct a new interview, evaluation, or assessment of a participant if it determines that it is appropriate to use a recent interview, evaluation, or assessment of the participant conducted pursuant to another education or training program.

Require assistance – When making the determination about whether an individual requires assistance, a one-stop operator may take into consideration the full cost of participating in training services, including the costs of dependent care and transportation, and other appropriate costs.

Training Services include, but are not limited to, the following:

1. Occupational skills training, including training for non-traditional employment

2. On-the-Job Training

3. Incumbent Worker Training

4. Training that combines workplace training with related instruction, which may include cooperative education programs

5. Training programs operated by the private sector

6. Skill upgrading and re-training

7. Entrepreneurial training

8. Transitional Jobs

9. Job readiness training provided in combination with other services in this list

10. Adult education and training program, provided concurrently or in combination with any of the other services identified above

11. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

All participants receiving training services under the WIOA program must have an individual training account (ITA) established on their behalf to finance training activities and associated costs. The following exceptions apply:

- On-the-Job Training, incumbent worker training, or customized training projects.

- Instances where the Workforce Development Board has determined there are an insufficient number of eligible training providers in the local area to establish an individual training account system. (The LWD Board has not made such a determination as of this writing.)

- A training program of demonstrated effectiveness, if offered in the local area by a community-based organization or private organization, which serves special populations who face multiple barriers to employment.

- If the local board determines a pay-for-performance contract is the most effective means of providing training services.

Priority: Local areas must give priority for receipt of training services to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient.

PROCEDURE FOR INDIVIDUAL TRAINING ACCOUNTS

Purpose

To identify requirements established by One Stop Employment Solutions and The Greater Lincoln Workforce Development Board regarding the establishment of an individual training account (ITA) and the limitations placed on the account.

Policy

Individual Training Account (ITA): Training services authorized under the Workforce Innovation and Opportunity Act (WIOA) shall be provided to eligible adults and dislocated workers (including displaced homemakers) utilizing individual training accounts established on behalf of the client so they may purchase training services for skills in demand occupations from eligible training providers they select in consultation with the service provider. The individual training account will be established and provided through the One Stop delivery system.

Contractual Agreements: Contractual agreements may be used in lieu of an individual training account when one of the following conditions exists:

- Training is provided by an employer through an On-the-Job Training, incumbent worker, or customized training project.
- The Greater Lincoln Workforce Development Board determines there are an insufficient number of eligible training providers in the local area to accomplish the purpose of the individual training account system.
- The Greater Lincoln Workforce Development Board determines a training service program, which has demonstrated its effectiveness, and is offered in the local area by a community based organization or another private organization, and serves the special client's population. Special clients are individuals who face barriers to employment such as: offenders, homeless, individuals with substantial language or cultural barriers, and other hard to serve populations as described by the strategic plan.

Criteria: The Greater Lincoln Board has established the following criteria:

- An Individual Training Account (ITA) must be established for all eligible adults and dislocated workers who are enrolled and receive training services under the WIOA Programs (with exceptions as previously noted).
- The costs for these participants will be reimbursed to the training provider through the financial voucher system.
- Eligible youth ages 18 to 24 years may be enrolled in adult program training activities, youth program training activities, or both programs concurrently. .
- Costs to participants who are enrolled in the Adult and Dislocated Program must be tracked and reported separately so the costs may be charged to the appropriate program.

- Concurrent enrollment does not allow the time limitations or cost limitations, as specified by this policy, to be exceeded.

Individual Training Account (ITA): Individual training accounts may only be issued after the following determinations or activities have taken place:

- The participant has been determined eligible, and after an interview, evaluation, or objective assessment has been determined to need training services, and to have the skills and qualifications necessary to complete a selected training program.

- It has been determined the participant is unable to obtain financial assistance from other sources to pay for the cost of training such as Trade Adjustment Assistance, Pell Grants, Welfare to Work Programs, State training funds, or will require financial assistance in addition to the other sources of funds.

- An individual employment plan (IEP) or Individual Service Strategy (ISS) has been jointly developed between the participant and the Case manager utilizing the results of an interview, evaluation or objective assessment. The IEP/ISS must identify the participant's employment goals, the appropriate achievement objectives, the combination of services required to achieve the employment goals, and the program of training selected to directly link the participant to the in-demand employment opportunities in the local area or in another area where the participant is willing to relocate. Goals should be established using career interest assessments along with a fully completed objective assessment.

- Training on the ITA must align with occupations classified as in-demand (H3, apprenticeship, or dynamic as defined by the Board) or be part of a career pathway as established in the IEP/ISS.

- The participant has been given the opportunity to review the State eligible training provider list so the participant may make an informed choice in the selection of a training provider.

- Individual Training Accounts are established for participants who have been determined eligible and are currently enrolled or will be enrolled in a program of training that can be completed by a full time student in two years or less. A program of training is defined as one or more courses or classes or a structured regiment, which upon successful completion, leads to:

    - A certificate, an associate degree, a baccalaureate degree or

    - 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.

- Participants must maintain at least a 2.0 grade average in graded courses or programs, and have at least a satisfactory rating in un-graded courses, each quarter/semester/term. If a client has two consecutive classes where they fall below a 2.0 GPA, OSES Program Manager approval is required to continue utilizing ITA funds. A client's previously earned grades, prior to enrollment in WIOA, will not be considered in a participant's maintenance 2.0 GPA.

- If a program requires a higher GPA then this will be the satisfactory grade.

- The individual training account may cover the costs of tuition, fees, books, and supplies. The supplies may include such items as pencils, paper, protective clothing, tools, or other materials that are specified by the training provider as a requirement under the training program curriculum. The costs for supplies such as pencils, paper notebooks, computer discs, etc. should be limited and only be approved for the training period the participant is enrolled in (i.e. semester, quarter, etc.) and not the entire period of training.

Extension Request: Any increase in the maximum cost limitation must be forwarded to the OSES Program Manager accompanied by the following documentation. The OSES Program Manager will make the determination for an increase in the cost limitations.

- Client's name and last 4 digits of their Social Security Number and;
- Justification for the request including a timeline and total program and supportive service expenditures to date and
- The signed (by both the participant and the Case manager) and updated Individual Employment Plan and;
- A current copy of the student's transcripts.

The maximum duration of WIOA training services shall not exceed 24 months for Adults and Dislocated Workers, starting at the time of NEworks Participation, without approval.

Extension Request: Any extension beyond 24 months must be forwarded to the OSES Program Manager by the following documentation. The OSES Program Manager will make the determination for an extension of the 24 month time limitation.

- Client's name and last 4 digits of their Social Security Number and;
- Justification for the request including a timeline and total program and supportive service expenditures to date and;
- The signed (by both the participants and the Case manager) and updated Individual Employment Plan and;
- A current copy of the student's transcripts.

PROCEDURE FOR ELIGIBLE TRAINING PROVIDERS

Purpose

To prescribe eligibility criteria and general conditions training providers must meet in order to become certified as an eligible provider to receive adult and dislocated worker funds through Individual Training Accounts.

Policy

Description: Requirements to become an eligible provider:

- Post-secondary education institution;
- Registered Apprenticeship program;
- Other public or private provider of training, which may include joint-labor management organizations and eligible providers of adult education and literacy activities under Title II of WIOA if such activities are provided in combination with occupational skills training;
- A local board, if it meets the requirements of Sec. 107(g)(1) of WIOA; and
- Community Based Organizations or private organizations that provide training under contract with the local board.
- There are procedures for removing institutions from the eligible provider list if the certification criteria are not met, and there are appeal procedures for institutions that have been removed.
- One Stop Employment Solutions training providers must also be certified under the local accreditation policy in order to receive WIOA funds.

Eligibility Requirements: All providers must apply for certification and submit the performance and cost information required. To remain eligible, providers must meet or exceed minimum levels of performance established by the state and localities.

In accordance with Sec. 122 of WIOA, the state will compile a list of eligible providers with cost and performance information. This information is provided so the customer is able to make an informed decision on which provider and program of training services best meets his/her needs. The list will be accessible electronically through the Nebraska Department of Labor (NDOL) website at www.dol.nebraska.gov. The Governor has designated NDOL as the agency charged with carrying out the responsibilities associated with the selection of service providers for Individual Training Accounts.

If an institution does not meet the certification criteria it will be removed from the eligible training provider list. Institutions removed from the eligible training provider list may appeal. The Appeal Process can be found on page 9 of this policy.

WIOA emphasizes informed customer choice, job-driven training, provider performance, and continuous improvement. The quality and selection of providers and programs of training services is vital to achieving these core principles. The state, in partnership with local boards, must identify

providers of training services that are qualified to receive WIOA funds to train adult and dislocated workers.5 Although the state establishes the minimum performance levels for initial determination of non-Higher Education Act/registered apprenticeship providers and all subsequent eligibility determinations, the local boards may establish additional performance levels for subsequent eligibility determinations.

The governor, after consultation with the state board, shall establish criteria, information requirements, and procedures regarding the eligibility of providers of training services to receive funds under 133(b) [Within State Allocation for Adult and Dislocated Worker Employment and Training Activities] for the provision of training services in local areas in the state.

Exemptions
The following are exempt from WIOA requirements:

- Providers registered under the National Apprenticeship Act shall be included on the list of eligible providers of training services for so long as the corresponding program of the provider remains intact;

- Providers of on-the-job training, customized training, incumbent worker training, internships, paid or unpaid work experience opportunities, and transitional employment shall not be subject to the eligible provider requirements listed in Sec. 122(a) through (f) of WIOA.

Many types of training services are eligible to be certified as eligible providers. A program of training services is one or more courses or classes, or a structured regimen, which upon successful completion, leads to:

- A certificate, an associate degree, or baccalaureate degree, or

- 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.

There are two types of eligibility, initial and continuing. They have slightly different qualifying procedures and will be discussed separately.

Initial Eligibility Requirements: Nebraska has established the following policies and procedures for determining the initial eligibility for training providers based on Section 122 of the Act:

For all programs that have not previously been eligible, except for Registered Apprenticeship programs, providers must submit required information for the programs to be considered for initial eligibility in accordance with the governor's procedures. Programs that become eligible under these procedures receive initial eligibility for only one fiscal year (July 1 through June 30).
Providers seeking initial eligibility under WIOA Title I-B to provide verifiable program specific performance information. The state's initial eligibility criteria requires applicant providers to, at a minimum:

- Describe each program of training services to be offered. Each program must be identified by name and be accompanied by a brief description;

- Provide information addressing a factor related to the indicators of performance, as described in Sec. 116(b)(2)(A)(i)(I)-(IV) of WIOA, which include: employment 6 months after exit, employment 12 months after exit, median earnings, and credentials attainment.

    - Employment after exit does not include subsidized employment.
    - Reporting data on Employment after Exit can be gathered through Wage Record Reporting. A training provider may choose to enter an Agreement with the Nebraska Department of Labor (NDOL) to access the Wage Record Reporting information. If a training provider elects to report Employed after Exit data an alternative way, the training provider will be required to submit the student's SSN in order for NDOL to validate the Employed after Exit data provided;

- Provide information concerning whether the provider is in a partnership with a business. This could include information about the quality and quantity of employer partnerships; and

- Provide information that addresses alignment of the training services with in-demand industry sectors and occupations to the extent possible.

Current Provider of Training Services (Per NDOL Preliminary Policy on ETPs)

Current training providers will continue to be eligible to provide training services until December 31, 2015, after which they will have to apply for continued eligibility. (WIOA Section 122(i))

Continued eligibility requirements apply to training providers transitioning to WIOA Title I-B who were previously eligible under WIOA Title I (including applicants who applied on or prior to June 30, 2015) and newly eligible training providers that were determined to be initially-eligible under WIOA Title I-B. Providers previously eligible under WIOA Title I will be subject to the application procedure for continued eligibility after December 31, 2015. The procedure for continued eligibility must be implemented in a timely way so that provider eligibility is established by the end of the transition period for these providers.

Newly eligible training providers that were determined to be initially-eligible under WIOA Title I-B will be subject to the application procedure for continued eligibility before their initial year of eligibility expires. The continued eligibility procedure should be implemented in a timely way so that continued provider eligibility is established by the end of their initial year of eligibility. All providers are subject to review and renewal of their eligibility at least every two years.

The following factors will be taken into account:

- The performance of providers as described in Sec. 116(b)(2)(A)(i)(I)-(IV) of WIOA. Until the performance data for each accountability measure is available, the governor may take into account alternate factors related to performance for that accountability measure. In considering alternate factors related to performance the governor may set minimal performance criteria, use existing available data, or develop other proxies as appropriate. Once training providers have two years of performance outcomes using the WIOA performance indicators specified in section 116, governors will be expected to take them into account;

- Access to training services throughout the state including rural areas and through the use of technology;

- Information reported to state agencies on federal and state training programs other than programs within WIOA Title I-B, including One-Stop partner programs;

- The degree to which training programs relate to in-demand industry sectors and occupations in the state;

- State licensure requirements of training providers, and licensing status of providers of training services, if applicable;

- The provider's ability to offer industry-recognized certificates and/or credentials;

- Information on whether the applicant has articulation agreements with other institutions of higher education; and list if so;

- The quality of the program of training services including a program that leads to a recognized post-secondary credential;

- The ability of the providers to provide training services that are physically and programmatically accessible to individuals who are employed and individuals with barriers to employment, including individuals with disabilities; and

- The timeliness and accuracy of the eligible training provider's performance reports.

Providers previously eligible under WIA Title I will remain eligible through December 31, 2015. These existing WIA providers are not subject to the initial eligibility procedures but are subject to the continued eligibility procedures under WIOA title I-B. These procedures do not apply to Registered Apprenticeship programs, which must be included and maintained on the eligible training provider list for as long as the program is registered.13 Nebraska is currently investigating opportunities to integrate Registered Apprenticeship programs onto the eligible training providers list.

Required Provider Information

All eligible training providers must submit accurate and timely performance data and cost information at least every two years. While the statute requires providers to supply information at least every two years, states may update the information in the state list more frequently, so that participants considering training have the most current information.

The program-specific information submitted to the state must include the following information, disaggregated by the local area being served, as applicable:

- Performance outcome information for the indicators described in Sec. 116(b)(2)(A)(i)(I)-(IV) of WIOA;
- Information identifying the recognized post-secondary credentials received from WIOA participants;
- Program cost information, including tuition and fees, for WIOA participants in the program; and

- Information on the program completion rate for WIOA participants. determines that a provider has demonstrated such extraordinary costs or undue burden,

The governor will establish a procedure by which a provider can demonstrate that providing this required information would be unduly burdensome or costly. If the governor

- Must provide access to cost-effective methods for the collection of the information;

- May provide additional resources to assist providers in the collection of the information from funds for statewide workforce investment activities described under Sec. 128(a) and 133(a)(1) of WIOA; or

- May take other steps to assist training providers in collecting and supplying required information such as offering technical assistance. 21

In addition to the information requirements for development of the list of eligible training providers, which are described above, Sec. 116(d) of WIOA requires providers to submit performance information for the state's Eligible Training Provider Performance Reports, which are disseminated publicly similarly to the list of eligible training providers. The USDOL Employment and Training Administration will issue separate guidance addressing the requirements for state Eligible Training Provider Performance Reports.

Required Reports

The WIOA Performance Accountability System provides for extensive reporting requirements, including some information not collected under WIA. These reports include performance data on all individuals engaged in a program of study for the following performance indicators:

- The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;

- The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program;

- The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;

- The percentage of program participants who obtain a recognized post-secondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program (such participants shall be counted as meeting this criteria only if such participants, in addition to obtaining such credential, have obtained or retained employment or are in an education training program leading to a recognized post-secondary credential within 1 year after exit from the program.)

- The percentage of program participants who, during a program year, are in an education or training program that leads to a post-secondary credential or employment and who are achieving measurable skill gains toward such a credential and employment; and

- The indicators of effectiveness in serving employers established according to Sec. 116(b)(2)(iv).

Administration: The Governor has designated the Nebraska Department of Labor as the agency responsible for carrying out the responsibilities associated with the selection of service providers for

Individual Training Accounts. These responsibilities include making determinations on whether a provider has met its performance levels and carrying out enforcement measures. The Nebraska Department of Labor was chosen as an unbiased broker of information and services. This agency is responsible for the employment statistics used to help eligible providers gather performance information.

Availability of the Eligible Provider Information**:** The Nebraska Department of Labor shall compile a single list of eligible providers from applications forwarded by the state board. It will maintain the list in at least two formats. They will disseminate the list, which includes performance information and program cost information. The list will be posted on the Nebraska Department of Labor website. The information shall be made widely available to participants in employment and training activities authorized under the WIOA and others, through One Stop Career Centers, Department of Labor local offices and partner agencies, schools and libraries.

Nebraska may enter into reciprocal agreements to permit eligible providers to accept Individual Training Accounts provided in another state.

PROCEDURE FOR ON-THE-JOB TRAINING & CUSTOMIZED TRAINING

Purpose

To identify the requirements for on-the-job training contracts and customized training projects.

Policy

On-the Job Training: On-the-job training (OJT) is training by an employer provided to a paid participant while engaged in productive employment. The employer may be from the public, private non-profit or private sectors. The OJT training program:

- Provides knowledge or skills essential to the full and adequate performance of the job.
- Provides reimbursement to the employer for up to seventy-five percent (75%) of the wage rate of the participant (not to exceed $6,000), for the extraordinary costs of providing the training and additional supervision related to the training.
- Is limited in duration as appropriate to the occupation the participant is being trained for, taking into account the training content, participant's prior experience and education, and the service strategy of the participant.

Customized Training: Customized training means training:

- Designed to meet the special requirements of an employer or a group of employers.
- Conducted with a commitment by the employer(s) to employ the client upon successful completion of the training.
- Employer pays for not less than 50 percent of the training costs.
- Customized training projects must be approved by the Greater Omaha Workforce Development Board.

On–The-Job Training Contract: A training contract must be developed between the service provider and the employer providing the training. The service provider must conduct a pre-award review to determine if the employer is qualified and capable of entering into a contractual agreement to provide on-the-job training. The pre-award review, in addition to the participant's employment plan, will provide supporting documentation for the appropriateness of the on-the-job training assignment. A pre-award review must be completed prior to the negotiation and approval of the OJT contract.

Limitations:

- Total cost of an OJT wage reimbursement cannot exceed $6,000.
- The OJT contract must be limited to the period of time required for the participant to become proficient in the occupation for which the training is being provided.
- Employers who have exhibited a pattern of failing to provide OJT participants with continued long term employment and wages, benefits, and working conditions equal to regular employees who have worked a similar length of time at the same type of work, shall not be considered for OJT contracts.

- Employers who have been debarred or suspended from receiving federal contracts shall not be eligible for an OJT contract.

- OJT contracts shall not be developed for:

    - Positions which do not provide a self-sufficient wage. (A self-sufficient wage is defined as a wage that provides sufficient income to support a minimally decent standard of living, without public cash assistance.)

    - Positions which receive a majority of pay from commission or piece rate wages.

    - Positions which are intermittent or seasonal.

    - Temporary employees who are supplied to an employer by a temporary agency/contractor.

    - Temporary positions except when the employer has the common practice of hiring all employees on a temporary basis, and letting them work into full-time permanent status after achieving pre-determined productivity levels, meeting qualitative standards, maintaining satisfactory attendance record, and/or other criteria as specified in the company's personnel policy.

    - Occupations in companies which have experienced a greater than average turnover rate during the preceding twelve-month period for similar types of industries.

    - Industries with a substantial number of experienced and able workers who are presently unemployed within the same labor market area (50 - mile radius).

    - Any establishment, or part thereof, that has relocated within the United States, Washington DC, and its territories, until 120 days after the date on which such establishment commences operations at the new location, if the relocation results in a loss of employment for any employee at the original location.

Workers' Compensation: All employers covered by the Nebraska Workers' Compensation law are required to provide Workers' Compensation Insurance for OJT employees. Employers exempt from Workers' Compensation (farm/ranch laborers and household domestic workers) are required to provide adequate on-site medical and accident insurance. Workers' compensation provides medical care and income maintenance protection to workers disabled from work-related injury or illness. Income maintenance coverage is not required for clients who are employed by exempt employers.

Exempt employers are required to certify in writing they provide adequate on-the-job training site medical and accident insurance. In addition, the OJT client should document that he/she understands the job is not covered by Worker's Compensation insurance and in the event of an injury; he/she would have no claim against the City of Lincoln/Urban Development, the LWD Board or the OSES Service Provider.

Types of Contracts: Most OJT contracts will be for full-time employment, or 40 hours per week. Part time OJTs may be written for 20 or more hours per week for persons whose need for employment is best served by less than full time work (for example, as appropriate, older workers, handicapped, single parents). In addition, a part time OJT contract of 20 or more hours per week may be written for a person seeking full time employment when no appropriate full time employment

is realistically available. A client may not receive training concurrently on two part time OJT contracts.

Work Opportunities Tax Credit (WOTC): For employers to receive a tax credit under these programs, the application for such credit must be forwarded to the Nebraska Department of Labor Office of Employment and Training on or before the start date of the job. Even though the one-year clock for WOTC starts on the first day of the OJT, the employer cannot claim a tax credit until the contract is completed. Questions on WOTC should be referred to the Nebraska Department of Labor Office of Employment and Training at (402) 471-2693.

Employer Referrals: Employers may refer individuals to the service provider for a determination of program eligibility and assessment of suitability for the-job training. Employer referrals cannot exceed thirty three percent (33%) of the total OJT contracts developed by the Service Provider.

OJT Tool Contract: The Service Provider is the purchaser and owner of all OJT tools and/or equipment for the participant's use during the OJT. Upon successful completion of the OJT the tools and equipment purchased will become the participant's property. If the participant does not complete the contracted OJT for any reason, all tools and equipment must be returned to the Service Provider.

PROCEDURE FOR APPRENTICESHIPS

Purpose

To address informational items regarding apprenticeship programs and assist staff in determining strategies that benefit their participants and contribute to meeting their performance goals.

Policy

Definition: According to the National Apprenticeship Program brochure -"Apprenticeship, in simplest terms, is training in occupations that require a wide and diverse range of skills and knowledge, as well as maturity and independence of judgment. It involves planned, day-by-day training on the job and experience under proper supervision, combined with related technical instruction."

Title 29, Code of Federal Regulations, Part 29.4 defines an apprentice-able occupation as a skilled trade which possesses all of the following characteristics:

- It is customarily learned in a practical way through a structured, systematic program of on-the-job supervised training.
- It is clearly identified and commonly recognized throughout an industry.
- It involves manual, mechanical, or technical skills and knowledge that require a minimum of 2,000 hours of on-the-job work experience.
- It requires related instruction to supplement the on-the-job training. Such instruction may be given in a classroom, through correspondence courses, self-study, or other means of approved instruction.

State Contact:
Debra Cremeens-Risinger, Nebraska State Director
U.S. Department of Labor
Bureau of Apprenticeship and Training
222 S. 15th St., Suite 504-C
Omaha, Nebraska 68102
Phone: 402-221-3281
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Cremeens-risinger.d@dol.gov

Eligibility Issues: Applicants for the apprenticeship training program must be at least 16 years old. If applying to be an apprentice in a hazardous occupation, individuals must usually be at least 18. The apprenticeship program sponsor may have additional requirements to ensure the applicants have sufficient ability, aptitude, and education to master the basics of the trade/occupation and to satisfactorily complete the related theoretical instruction required in the program. In addition to the completed application form, each prospective apprentice may be required by the sponsor to submit a transcript of school subjects and grades, proof of age, honorable military discharge (if applicable), and high school diploma or equivalency certificate (if applicable.) Although no previous experience is necessary to become an apprentice, some sponsors may require references from previous employers.

Apprenticeship Program Sponsors in Nebraska: Organizations which apply for apprenticeship sponsorship enter into an agreement with the Federal Government or appropriate State Government to operate their proposed programs consistent with 29 CFR Parts 29 and 30. An outline of on-the-job training tasks and an outline of the curriculum for the required trade instruction are part of this agreement.

A listing of apprenticeship program sponsors recognized in Nebraska can be viewed at http://bat.doleta.gov/.

Eligible Providers of Training Services: Entities that carry out programs under the National Apprenticeship Act must meet the requirements specified in WIOA Section 122, the final implementing regulations, and the State "Eligible Training Provider Policy" to be certified as an eligible provider to receive WIOA adult and dislocated worker funds through ITAs.

Incumbent Worker Status: Since participants become employed after signing the apprenticeship agreement, it is recommended that the WIOA eligibility issues be addressed prior to assisting them into the apprenticeship program.

If the individual comes to the American Job Center already employed by a company and desires to enter an apprenticeship program, there are some requirements to keep in mind:

- Individuals who have entered into other employment since a termination or layoff are considered eligible if the employment is less than one continuous year and the individual is earning seventy-five percent or less of the wage paid at the time of termination or layoff. Employment over one continuous year shall be considered an occupational change.

- Dislocated workers shall not be considered eligible for services with the same employer or in the same occupation.

- Local areas must give priority for adult individualized career and training services to recipients of public assistance, other low-income individuals, and those who are basic skills deficient, unless the local area has determined funds are not limited under the criteria (discussed in policy).

Length of Apprenticeship

Many apprenticeship programs take 2 - 4 years to complete. It is important to keep this in mind when enrolling the adult, dislocated worker and older youth participant. An extension may be needed in some cases to prevent an exit until they have completed their apprenticeship program or are able to successfully complete on their own.

WIOA Activity Form

Under Activity in NEworks: If some of the training is paid from private, non-WIOA Title I sources then Private Sector Training would be indicated (formal training programs conducted or sponsored by private business or organized labor). It may include apprenticeship training programs and specialized programs on specific machines or in the application of specific computer programs presented by the manufacturers of such machines or programs. There may be WIOA dollars assisting with the training costs.

If the participant is concurrent, then consider using "Partner Training" - WIOA or non-WIOA partner training activities coordinated with the individual's WIOA Title I-B activities, through a formal co-enrollment, and must be included in the individual's WIOA service plan. Recipients of partner training activities can be counted just like WIOA services when determining the exit date. This is a good activity choice to choose when the WIOA activities are over, the participant was concurrently enrolled, and the non-WIOA partner training activities will be going on for some time. This avoids the soft exit from automatically kicking in.

In most cases, "On the Job Training" would not be an appropriate choice due to the length of most apprenticeship programs.

For "Provider" select the Eligible Training Provider from the list. If an Individual Training Account is established, complete all appropriate sections for the ITA and indicate amount to be used to cover costs for books, tools, etc.

GENERAL INFORMATION ON TRAINING SERVICES & BEST PRACTICES

- ITA's do not apply to OJT's, therefore all costs associated with the OJT do not apply to the costs associated with an ITA.
- A client may be simultaneously enrolled in an OJT and an OST activity.
- There is no policy or regulation prohibiting you from entering into an OJT contract with a federally funded employer as long as the work is not for public service.

After an interview, evaluation, assessment, or case management and before deciding on training, the Case manager must ask these questions:

1. Has the participant met the qualifications to be eligible for training services and has he/she been determined to be unable to obtain or retain employment?
2. Does the participant have the skills and qualifications to successfully complete the selected training program?
3. Is the program of training services directly linked to in-demand employment opportunities either in the local area or in another area to which the individual is willing to relocate?
4. Is there another funding source willing to pay the costs of the training, including such sources as State-funded training funds, Trade Adjustment Assistance and Federal Pell Grants?
5. If funding is limited in the local area, does the adult participant meet the priority requirements given to recipients of public assistance, other low-income individuals, or being basic skills deficient?

GENERAL INFORMATION ON SERVICES & BEST PRACTICES

1. As part of the assessment process, the case manager may help the participant assess his/her own situation. Is he/she in a job/career he/she can excel at? Is he/she utilizing his/her skills and talents to be successful?

2. If determined appropriate based on the need of the individual participant, the "combination of services" includes supportive services.

3. As part of the assessment process, the service provider may help the participant see what needs to change.

    a. Do some areas in their life make them miserable? Comfortable people don't change.

    b. Identify in the assessment process the motivator that will make the participant strive for change.

    c. Assessment is individualistic and is based on what participant has said or done.

    d. Focus on strengths and accomplishments and then identify the barriers to meet the next goal.

Child Labor Laws
At 19 years of age, all the child labor laws, both state and federal, no longer apply to any client. Therefore, all participants 19 or above may travel out of state as part of a work experience activity.

Individual Service Strategy Plan
Engage participant during every step of the process when building the plan to get the commitment and ownership of the participant. She or he must make the decisions for their life. The Case manager may decide if there is funding for the decision or not, but the plan must reflect the participant's decisions.

- Help the participant believe they can change and things can get better.

- Help participant identify what they want (goal setting). Break down the goal into double action steps.

- The plan states what the participant shall do and what the Case manager shall do.

- Identify the skills that need to be developed so the participant is able to not only get employment, but also keep the job.

- Action steps need to be as specific and concrete as possible.

- Make participant aware of help and resources available. Consider all partner resources.

- When both the participant and Case manager sign the plan, it is easier to get agreement and commitment from the participant.

Guidance

- Listening (most critical). Try to build a relationship with participant so he/her will trust you.

- Ask questions. Participants need to think and make their own decisions.
- Confront. Try to get participants to see what they are doing that is not working for them.
- Focus on behaviors. Ask for the participant's permission to discuss issues that may be standing in the way of their success in reaching goals. Once the permission is given, then deal with uncomfortable issues.
- Self-disclosure is not recommended. Everyone believes their experience is unique and the focus should be on the participant's story.
- Summarize what has been communicated.
- Teach problem solving. If participants learn to solve problems by themselves, they shall be able to overcome obstacles when the caseworker is not there. When faced with a problem, they need to learn to consider options, the downsides of each option, and then make a choice.

Job Retention

- Plan for emergencies. Consider the first month of work in the form of a "tragedy calendar" and prioritize what participant should do if such and such happens.
- Walk through expectations of employers.
- Discuss the "do's" and "don'ts in getting along with coworkers if the participant is new to the workforce.
- Consider mentors and job coaches, where appropriate.

STANDARDS

"An Individual Employment Plan is a Living Plan that is Comprised of Steps that correspond to NEworks Activities or Supportive Services."

Individual Employment Plans Should Always:

1. Be Developed with the Participant
2. Have Reasonable, Understandable, Measurable, Believable and Achievable Goals (RUMBA)
3. Be Dated and Signed, and reviewed/updated every 90 Days
4. Be Consistent with all NEworks Data, File Documentation and Case Notes

BEST PRACTICES

EMPLOYMENT GOAL

The employment goal should include:

- A goal of unsubsidized employment in a specific occupation

Do Not Include in the employment goal statement:

- Employer, wages or benefits as related to employment goal
- Length of time to achieve goal
- Type of training
- Length of training
- Name of training institution

ASSESSMENT

Include the Scale Score and Grade Level for assessments when applicable.

INTEREST/APTITUDE

Check all instruments that apply

BARRIERS

Goals/objectives should be:

- Specific and directly linked to the participant's challenges to achieving their employment goal
- Consistent with issues identified on the Determination of Need Form
- Consistent with barriers entered in NEworks
- Consistent with services listed in the IEP/ISS
- If a client is basic skills deficient as evidenced by their Assessment results, this should be identified as a barrier and have a corresponding service/activity to help overcome the deficiency.

ACTION PLAN – INDIVIDUALIZED CAREER SERVICES

Standards for Completion

- The first NEworks activity following a participation date should be Assessment/IEP/ISS Development.
- All services should have a corresponding NEworks Activity
- All services should identify the provider and type of service (as applicable)
- All dates for services should correspond to the dates entered in NEworks.
- Case notes should be recorded at least once every 30 days for each contact with an active service at least once every 90 days. All case notes should be dated.
- All attempts to contact should be case noted.

Acceptable Progress Notes (depending on the activity and service being provided)

- Administration of Assessment Tools
- Case Note Citation
- Receipt of Timesheets
- Supervisor Evaluation
- Conversation with Counselor
- Receipt of Test Results
- Receipt of Invoices

ACTION PLAN - TRAINING SERVICES

Standards for Completion

- All services should have a corresponding NEworks Activity
- All services should identify the provider and area of training/service being provided
- All service/activity dates should correspond to the dates entered in NEworks.
- Case notes should be recorded at least once every 30 days for contact and at least once every 90 days for each active service. All case notes should be dated.
- All attempts to contact should be case noted.

Acceptable Progress Notes (depending on the service/activity being provided)

- Receipt of Grades
- Receipt of Test Results
- Case Note Citation
- Receipt of Timesheets
- Conversation with Advisor
- Supervisor Evaluation
- Receipt of Invoices

ACTION PLAN - SUPPORTIVE SERVICES

Standards for Completion

- All supportive services should identify the activity with which it is associated.
- All dates should correspond to the dates entered in NEworks.

- Case notes should be recorded at least once every 30 days for contact and at least once every 90 days for each active service. All case notes should be dated.

- All attempts to contact should be case noted.

Acceptable Progress Notes

- Case Note Citation

- Receipt of Invoices

MISCELLANEOUS

All updates to the IEP/ISS, must be documented in a case note, regardless of who provided assistance to the participant.

Reasons to revise (requires a new signature by the participant and Case manager)

- Addition or Removal of a Planned Service

- Time or Funding Extension

- Change in employment or other goals

GENERAL INFORMATION ON TRAINING SERVICES RESOURCES

Forms

The following forms are **required** to be used when delivering occupational skills training services:

- **ITA Voucher**
- **Determination of Need**
- **Demand Occupation Form**

The following forms **may be used,** when applicable, in delivering training services:

The following forms are **required** to be used when delivering an OJT:

- **OJT Pre-Award Review**
- **OJT Contract and Conditions**
- **OJT Training Plan**
- **OJT Training Related Education Outline**
- **OJT Length Determination Form**

Approvals

Approvals are required for the following actions related to the delivery of training services for Adults & DLWs:

Action	Required Documents	Approval
Exceed the $6,000 OJT Limit	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the client's current circumstances and; Updated IEP Plan	OSES Program Manager
Exceed the $10,000 ITA Limit	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the client's current circumstances and; Updated IEP Plan	OSES Program Manager
Exceed the $3,500 ITA Limit for short term training (6 months or less)	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the client's current circumstances and; updated IEP plan	OSES Program Manager
Exceed 36 Month Time Limit	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the client's current circumstances and; Updated IEP Plan	OSES Program Manager

Two Consecutive Terms Below a 2.0 GPA or cumulative GPA below 2.0	Client Name and last 4 digits of their Social Security Number and; Justification for the request referencing the client's current circumstances.	OSES Program Manager

PROCEDURE FOR ENTREPRENEURIAL AND SELF-EMPLOYMENT TRAINING

Procedure

To identify assistance available, and requirements for participating in entrepreneurial and/or self employment training, as established by the Workforce Investment Act.

Policy

The U.S. Department of Labor, Employment and Training Administration (ETA) in TEGL 12-10 is encouraging the workforce system to establish parameters for investing in entrepreneurship training that include:

Assessment

Entrepreneurship is a high-risk endeavor, and not everyone is suited to self-employment. The workforce investment system can provide a valuable service by helping customers understand the challenges of entrepreneurship and what is likely to be required of them, and helping them determine whether their financial skills, tolerance for risk, and other skills, attributes, and experience make them good candidates for starting a business.

The Small Business Administration (SBA) offers an on-line assessment designed to help individuals better understand their readiness for starting a small business. The tool links users to additional SBA resources to help improve their readiness for starting a small business. It is available online at http://www.sba.gov/assessmenttool/index.html.

Partnerships

Most communities offer a range of resources to assist entrepreneurs. Rather than duplicate existing services, the workforce investment system can maximize its investment by developing partnerships with the entrepreneurship community and leveraging workforce system resources and expertise in support of entrepreneurship needs.

Key partners could include Small Business Administration funded programs, such as SCORE, Small Business Development Centers, Women's Business Centers, and Veterans Business Outreach Program; Vocational Rehabilitation Agencies, U.S. Export Assistance Centers; local community colleges and four year universities; regional economic leadership teams; community-based or faith-based service providers; local chambers of commerce; other local economic development entities including rural economic development organizations; and financing organizations such as banks, venture capitalists, and angel investors.

Staff may also consider working with veterans' programs such as the Disabled Veterans' Outreach Program and Local Veterans' Employment Representatives Program, as well as Disability Program Navigators staff. The workforce system should develop an understanding of the assets and expertise of these partner organizations, and develop strategies to leverage these assets as part of any entrepreneurship-related services provided to workforce system customers.

Appropriate and Effective Training

Training is an important component of workforce system strategies to support entrepreneurship and self-employment. Many training programs exist for entrepreneurs, and the workforce system will need to explore a variety of training and service providers to identify those best able to meet the needs of their One-Stop customers.

Steps must be taken to ensure that workforce system customers are referred to quality training programs. The workforce system is encouraged to work with service providers offering, at minimum, basic courses for those just starting businesses that focus on developing a business plan.

Topics covered in these basic courses also may include market research, marketing, pricing, financing, cash flow, accounting, hiring, permits and licenses, and legal issues. Other courses should target participants who already have developed business plans and may have started their businesses, but need assistance in growing the business.

These more advanced courses may cover topics such as growth strategies, business planning, and customer relations. In addition to training courses, some providers also may offer seminars on specific business types (e.g., child-care
businesses), e-commerce, or accounting software packages.

Self-employment training programs and providers of these programs can and should be included on the statewide eligible training provider lists. WIOA regulations require that "training services, whether under ITA's or under contract, must be provided in a manner that maximizes informed customer choice in selecting an eligible provider."

Ongoing Support and Technical Assistance

Individuals are more likely to succeed in entrepreneurial efforts when they have access to additional support services, such as, business counseling, marketing support, mentoring, peer support or networking, referrals to funding opportunities, business incubators, credit repair services, and/or business libraries. These services may be provided directly through One-Stop Career Centers, or through entrepreneurship partners.

Performance Accountability

Customers receiving entrepreneurial and self-employment training are included under WIOA's performance accountability system. As discussed in TEGL 17-05, unemployment insurance (UI) wage records are the primary data source for verifying the adult performance measure outcomes and the employment portion of the youth placement in employment or education measure.

Certain types of employment, particularly self-employment, are generally not covered by state UI wage records, and the system has noted this as a challenge in providing entrepreneurship training. However, supplemental data options for some performance measures, combined with performance target negotiations, offer flexibility to accommodate entrepreneurship training within the workforce system.

In order to verify employment status for the Entered Employment, Employment Retention, and supplemental data and administrative records may also be accepted.

This option may require some additional follow-up by local workforce investment areas to track more closely those individuals who receive entrepreneurial training, but also provides a significant opportunity to make a full and accurate account of employment outcomes for this set of participants.

Role for the Workforce Investment System.

The workforce investment system can play an important role in support of entrepreneurship by:

- Engaging with local, regional, and state partners to develop an entrepreneurial environment and developing strategies to leverage workforce system resources to identify and support potential entrepreneurs;
- Informing One-Stop customers about opportunities for self-employment and entrepreneurship and working with customers to assess whether self-employment is a good fit;
- Helping One-Stop customers understand the range of entrepreneurship resources available and referring them to counseling and training that best meet their needs;
- Partnering with organizations that support entrepreneurship and co-locating small business development resources within One Stop Employment Solutions;
- Seeking out opportunities to add entrepreneurship training programs to the eligible training provider list;
- Developing strategies to help small business owners to grow their businesses, such as developing training programs that help small business owners develop growth strategies to enable new job creation.

Allowable Costs

There are a range of activities allowable under WIOA that promotes the success of small businesses and entrepreneurship. The following uses of WIOA funds are allowable when they are reasonable and necessary costs in support of the purpose of the grant:

• Entrepreneurial Training. WIOA funds may be used for training for new entrepreneurs and small business owners, which can range from general business courses to specific courses on such topics as how to address legal and personnel issues.

• Skills Training. WIOA funds may be used for skills training for potential employees, and, subject to certain restrictions by fund source, for customized training for incumbent workers. Small businesses can also arrange On-the-Job Training (OJT) with One-Stop Career Centers.

• Credentials. WIOA funds can be used to pay costs associated with obtaining a skill or occupational credential that demonstrates the expertise of the entrepreneur or small business

owner. Examples include a barbering credential, certified pension consultant, title examiner, or notary.

The definition of credential can be found in TEGL 17-05. WIOA funds may not be used to cover the costs associated with standard business licenses or degrees that do not pertain to a specific skill or occupation.

- A portion of Equipment, Software, and Computer Costs. Equipment, software, and computer costs are all treated differently under the Office of Management and Budget Cost Principle Circulars on allowable costs.

Although WIOA funds cannot be used to purchase equipment or other capital assets, software, or computers for the sole use of the small business's commercial operation, if they are purchased by the business and used to provide training to eligible program participants, the business can charge a user fee to the grant as follows:

- Equipment (acquisition cost of $5,000 or more with a useful life of more than one year). For capital assets such as equipment, a use allowance fee may be charged to the grant for the time the equipment is used for training. The fee is capped at 6 and 2/3 percent of acquisition cost on a yearly basis and may only be charged proportionate to the time the assets are used in training. [See 20 CFR 225 (OMB Circular A-87) Appendix B, Item 11 for a more detailed description of depreciation and use allowance costs and their application to Federal grant projects.]

- Software. Software is not considered a fixed asset under the allowable cost principles. For software costs, a share of the annual licensing agreement fee or other such costs associated with the use of the software may be charged to the grant proportionately based on the amount of time the software is used for training of eligible program participants.

- Computers. Computers are considered to be either supplies or equipment based solely on the purchase price and definition under allowable cost principles. (Computers are generally considered to be supplies if they are personal property other than equipment and cost less than $5,000 per unit. However, this is not the case if purchased as a part of a network with a total acquisition cost of $5,000 or more.) As a supply, the proportional share of the cost of a computer may be charged to the grant based on the time the computer is used for the training of eligible program participants.

Please note that business capitalization costs or other economic development activities not directly tied to training are not allowable.

PROCEDURE FOR CLIENT REIMBURSEMENT OF TRAINING COSTS AND RETURN OF MATERIAL

Purpose

To provide guidance for seeking repayment and return of training materials.

Policy

All materials (i.e., tools, books, etc.) purchased by WIOA funds will remain the property of OSES until the client successfully completes his/her training program.

If a client is unwilling to complete the training program, all materials are to be returned immediately and tuition costs paid by WIOA funds must be reimbursed to OSES.

Documentation of the attempt to recover the reimbursement of training costs and/or the return of training materials when applicable shall be included in the case manager's case notes.

OSES Program Manager approval must be obtained if the case manager is unable or has good cause to not seek reimbursement. Requests should be accompanied with appropriate documentation, and if approved, the repayment of training costs and/or the return of training materials will be waived.

Cost for the number of credit hours dropped late will be subtracted from the costs for the next term.

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 5

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

Support Services for Adult and Dislocated Workers

GENERAL INFORMATION ON SUPPORT SERVICES

Support services may only be provided to participants who are participating in individualized career or training services, and are unable to obtain the services through other programs which provide such services. In addition, these services may only be provided after it has been determined such services are necessary to enable the client to participate in Title I, Workforce Innovation and Opportunity Act (WIOA) activities.

Coordination between the service provider and the other Workforce Development partners must take place to determine the availability of supportive services from sources other than the WIOA program. The service provider must become familiar with the provisions of the Memorandum of Understanding (MOU) established between the One-Stop partners and the One-Stop Operator. The MOU should define the type of supportive services available from each participating partner.

Supportive services do have cost and time limitations, but in some instances may be exceeded with the approval of the OSES Program Manager. The request for approval to exceed the limitations must be completely justified.

A key point in making a decision to provide supportive services is the question of whether or not the services are necessary to enable the client to participate in programs provided by WIOA. Determinations to provide supportive services, which do not meet these criteria, will, in all likelihood, be questioned by an audit review or monitor review. In all cases, the service provider representative must fully document their determination and the determination must be a part of the participant file.

PROCEDURE FOR PROVIDING SUPPORTIVE SERVICES

Purpose

To establish local policy for providing supportive services, and identify the requirements One Stop operators and service providers must adhere to in providing such services to adults, dislocated workers, and youth.

Policy

General Provisions:

- Supportive services may only be provided to participants who are participating in individualized career or training services and are unable to obtain the services through other programs who provide such services.
- Supportive services may only be provided after it has been determined such services are necessary to enable the participant to participate in WIOA activities.
- Supportive services may only be provided after it has been determined the participant is unable to obtain supportive services through other programs providing such services.

Assessment of Need and Documentation: The service provider must thoroughly assess the participant's need for supportive services, document the results of the assessment, and document the provision of such services through vendor receipts, invoices, voucher, etc. Additionally the participant and service provider must develop a plan on how the participant will support a part or all of the expense for supportive services issues once the initial assistance has been given to the participant. For example: It would not be prudent for the program to pay for gasoline expense for two years while the participant is in training.

Coordination and Referral: The service provider must document the efforts made to contact and coordinate with the available partners and, if applicable, the inability of such partners to provide the needed supportive service.

One Stop operators, service providers, and One Stop partners shall identify in the Memorandum of Understanding (MOU) the process utilized to ensure resource and service coordination regarding supportive services including how supportive services will be funded when they are not available from other sources. In addition, the MOU must describe how accurate information will be provided on the availability of such services in the local area. All Community Partner MOU's are negotiated by the One Stop Manager and should include language on referral procedures as necessary.

Time Limitations: Supportive services may be provided during participation in the WIOA program and up to six months after the date on which the participant completes the program for adult and dislocated worker services and during the full 12 months of follow up for youth services.

Cost Limitations: The cost of reimbursement or direct payment to participants for supportive services shall be the actual costs incurred up to the maximum amount allowed. Costs must be reasonable and competitively priced. An effort must be made by the service provider to make this determination. The cost limitation includes all supportive services provided during the participant's enrollment and those supportive services provided to the client as part of follow up after exit.

Approval Authority: Supportive services are not automatic or guaranteed; they are based on participant need and necessity to enable the participant to participate in approved programs and only when similar services are unavailable within the community. The participant's need and necessity of the supportive service must be documented in the case file; and for participants enrolled in individualized career or training services, must be included in the Individual Employment Plan (IEP).

Cost Considerations: The cost of supportive services must be both reasonable and competitive in price. When multiple options are available for receiving supportive services, documentation must show a reasonable effort was made to determine and choose the lowest, competitively priced service available.

Approval to Exceed Limitation: In some instances, there may be a need to exceed the limitations specified by this policy. In such cases, the OSES Program Manager may approve actions to exceed established limitations.

The service provider will establish appropriate limits for all supportive services. Requests to exceed limitations will be forwarded to the OSES Program Manager for approval and will include:

- Client Name and last 4 digits of their Social Security Number and
- Identification of the additional supportive services needed and approximate cost and;
- Justification for request, including documentation of need and;
- Current client activity status.

It is not feasible for this policy and corresponding chart to describe all potential supportive services that can be delivered in the Greater Lincoln Area. If a staff member encounters a situation requiring supportive service and the service is not addressed in this policy, the staff member is to follow the steps described above to request approval from the OSES Program Manager.

The OSES Program Manager will evaluate the request on a case-by-case basis and either approve or disapprove the request for additional supportive services within seven (7) working days.

PROCEDURE FOR TYPES OF SUPPORTIVE SERVICES

Purpose

To identify the different types of supportive services allowed to WIOA clients.

Policy

Supportive Services: Assistance for allowable services include, but is not limited to:

- Transportation
- Childcare
- Housing
- Dependent care
- Referral to medical services
- Need related payments
- Protective clothing, eyewear, tools, equipment required to participate in a training program or employment
- Education related application fees

Transportation Assistance: Transportation assistance includes costs for items such as: mileage reimbursement, basic car repairs, car liability insurance, bus, or other transportation fares.

Mileage Reimbursement: Mileage reimbursement is available for participants who must commute to and from a work site or training site for which no other form of transportation is available. Mileage reimbursement is also allowed during the first 30 days of unsubsidized employment to support the participant in retaining employment until their first pay check is received. "Map" mileage may be used as the basis for payment.

Basic Car Repair: Supportive service cost for emergency car repairs is authorized. Participant must have approval from the WIOA Case Manager before assistance is provided. Preventive maintenance work is not covered as a supportive service.

Bus or Other Transportation: Assistance for bus tokens, tickets, and cost for other fares (taxi, daily ride with other providers, etc.) is authorized, provided no other form of transportation is available.

Childcare: Childcare assistance may be provided by a licensed day care provider to participants who are not able to participate in WIOA programs without such assistance. This includes participants who are in danger of dropping out or making less than satisfactory progress due to unsatisfactory or unreliable childcare arrangements.

Emergency Housing: Emergency housing assistance may be provided to participants on a one-time basis. The assistance may include cost for rent, mortgage payment, and relocation expenses. Since this is a one-time emergency intervention, a plan must be established to ensure the client will be able to meet long term housing needs.

If 2 WIOA participants are co-habitating and request emergency housing assistance, the OSES Program Manager will determine how the provision is made and allocated. However, each participant is only allowed one type of emergency housing assistance during their time in the program, unless approval from the OSES Program Manager.

Utilities: Payments can be made for electric, gas, water/sewer utilities to prevent shutoff or to reinstate service.

Dependent Care: Assistance for dependent care is authorized and may be provided to participants who are responsible for such care to a minor or adult member of the family.

Medical Services: Supportive service assistance is authorized for healthcare and medical services. This assistance is not intended to cover the costs of major issues such as major surgery or major dental care, and is not intended to encourage visits to healthcare centers or doctors for minor illnesses such as flu, colds, etc. for which the participant would not normally seek medical attention. Reimbursement claims for providing this assistance must include the name of the participant, the type of assistance provided, the providers Federal ID number and be signed by the provider.

Protective Clothing, Tools, and Equipment: Supportive services assistance is authorized for protective clothing, tools, and equipment required for participants to enroll and participate in training programs or other employment under WIOA. These items may include eyewear, steel-toed shoes, work related or training related tools and equipment, uniforms, etc. If these items are required under a training program curriculum, they become training costs and are included in the individual training account obligations.

Items not included in a training program curriculum are supportive services if they are provided to the participant. To authorize supportive services for protective gear, it must be determined the items are necessary to protect the participant's health and safety. Tools and equipment procured for participants to obtain employment after they have completed a training program must be fully justified by an employer's statement, or by sources other than the participant.

Education Related Application Fees: Supportive service assistance is authorized for the payment of application fees to educational institutions. These are fees that are paid to determine a participant's eligibility and acceptance at the educational institution and which will allow the client to obtain information on financial aid awards.

Needs Related Payments: Supportive service assistance is authorized for Needs Related Payments for Adults and Dislocated Workers to provide financial assistance that will enable them to participate in training. To be eligible, a participant must meet the following requirements:

- Be unemployed, and

- Not receiving Unemployment Insurance (either didn't qualify or ceased qualifying; if a Dislocated Worker, the individual cannot be under TAA or NAFTA), and

- Must be enrolled in a training service under the Workforce Innovation and Opportunity Act and able to start that training within a 30 day time frame.

A maximum of $450 per full-time, occupational skills training term is allowed. Payments for additional training terms are allowed after re-assessment of need and documentation of eligibility.

Linkages to Community Services: Assistance in providing linkages, referrals, and accurate information about the availability of supportive service assistance not provided or funded by the Workforce Innovation and Opportunity Act. These services may include: Food stamps, temporary assistance for needy families (TANF), veteran's assistance funds, financial assistance for education, county public assistance funds, etc.

The official OSES Support Service OSES Policy can be found at F:\WorkForce\Private\Policy\OSES Policies\Support Services Policy

Instructions on payment for support services can be found in Section 9 - Financial

SUPPORTIVE SERVICES CHART

Service	Limit	Approval to Exceed Limit
Total Supportive Services	$3,500	OSES Program Manager
Total of all Transportation Related Services	Cumulative maximum of $800	OSES Program Manager
Mileage Reimbursement	$0.30/mile	Not Allowed
Basic Car Repair	$500	OSES Program Manager
Car Liability Insurance	$600	OSES Program Manager
Bus & Taxi Fares	$800	OSES Program Manager
Emergency Housing [1]	$600	OSES Program Manager
Child Care (Title XX Preference)	$5/hour/child or $1,000/family	OSES Program Manager
Dependent Care	$5/hour/member or $1,500/family	OSES Program Manager
Health/Medical Services	$250/visit and $600 total	OSES Program Manager
Protective Clothing, Tools & Equipment	$600	OSES Program Manager
Car License	Not Allowed	N/A
Needs Related Payments	$450 per OST Term	N/A

[1] The frequency of supportive services delivered to each participant is based on their Individual Employment Plan (IEP) with the exception of Emergency Housing. Emergency Housing may be provided one time only to each participant. Additional Emergency Housing supportive services must be approved by the OSES Program Manager.

GENERAL INFORMATION ON SUPPORTIVE SERVICES RESOURCES

Forms

The following forms are **required** to be used when delivering supportive services:

- **Purchase Order form**
- **Case Management Notes**

The following forms **may be used,** when applicable, to assist in delivering supportive services:

- **Support Service Referral Form**
- **Child Care Log**
- **Dependent Care Log**
- **Motor Vehicle Mileage Log**
- **Bus Ticket Log**

Approvals

All described supportive service actions requiring approval were described in the Supportive Services Chart. In addition, given the unique nature of participant services delivery, the potential exists for other situations to arise that warrant supportive services but are not addressed in the previous policy. All requests to OSES Program Manager for approval require the following documentation:

- Participant Name and Social Security Number and;
- Identification of the additional supportive services needed and approximate cost and;
- Justification for request, including documentation of need and;
- Current participant activity status.

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 6

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

Performance Standards and Credentialing

GENERAL INFORMATION ON PERFORMANCE STANDARDS & CREDENTIALING

General Information for Performance Standards

The State currently operates under Common Measures for Performance. The 9 common measures cover selected items of performance in the Adult, Dislocated Worker, and Youth programs for the services they received under the Workforce Investment Act/Workforce Innovation and Opportunity Act (WIOA) programs.

The baseline goal of each performance indicator is negotiated with the State Workforce Development Board for each new program year.

Attainment of the baseline goal is extremely important since the State may be eligible to apply for incentive funds if they meet the baseline goals of the Workforce Development performance indicators and the Department of Education goals.

All three local Workforce Development Areas (Greater Omaha, Greater Nebraska, and Greater Lincoln) contribute to the achievement of the baseline goals established for the State of Nebraska.

General Information on Credentials

A credential is a national, state, or locally recognized degree or certificate which may include, but not be limited to: a high school diploma, a GED or recognized equivalent, post-secondary degree or certificate, recognized skill standards certificate, licensure or industry recognized certificate, or other state or local credentials which recognize successful completion of a training service or activity which is designed to equip and prepare clients to enter unsubsidized employment, retain employment, re-enter employment, or advance to better employment.

To be eligible for a credential, the client must successfully complete an academic or occupational training activity of eight (8) hours or more in actual training time. The academic or occupational training activity may be funded by WIOA funds or by funds from programs delivered by the Workforce Development Partners.

PROCEDURE FOR PERFORMANCE STANDARDS

Purpose

Identify the six common measures of performance for Workforce Development activities in the Adult and Dislocated Worker programs.

Policy

The common measures of performance apply to all individuals who are registered for the Adult and Dislocated Worker Workforce Development programs.

WIOA Performance for PY15 (July 1, 2015 to June 30, 2016)

- Entered Employment Rate in the 1nd Quarter after Exit
- Employment Retention Rate in the 2nd & 3rd Quarters after Exit
- Average Earnings in the 2nd Quarter after Exit

WIOA Performance Changes for PY16

Under WIOA, the Performance Measures change from the nine common measures to the following:

Adult & Dislocated Worker (for each)

- Employment Rate in the 2nd Quarter after Exit
- Employment Rate in the 4th Quarter after Exit
- Median Earnings in the 2nd Quarter after Exit
- Credential Attainment during or up to one year after Exit
- Skills Gain (still to be fully defined)
- Effectiveness of Serving Employers

These will be measured beginning 7-1-16. It is critical that a service strategy be adopted now that will help to prepare those currently enrolled, as well as those who will be enrolled in the programs, for success.

PROCEDURE FOR ENTERED EMPLOYMENT RATE PERFORMANCE MEASURE

Purpose

To address the entered employment rate from a WIOA Title 1 program perspective in Nebraska in light of the WIOA Common Measures still in effect during PY15 of WIOA.

Policy

Performance Measure Definition

Entered Employment Rate

Of those who are not employed at the date of participation:

$$\frac{\text{\# of Adults/DLWs who are employed in the 1st quarter after the exit quarter}}{\text{\# of Adults/DLWs who exit during the quarter}}$$

Specific Requirements: Participants who are working, including part-time at participation will not count in this measure.

Timing is imperative when exiting participants. It may make sense to exit participants towards the end of the quarter if they are employed as they will only have to remain employed a short time in order to count as a success.

Exclusions: Participants in the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter, will be excluded from the computation of this measure:

- Institutionalized - The participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain in that institution for at least 90 days. Individuals with disabilities (as defined in 29 CFR 37.4) residing in institutions, nursing homes, or other residential environments cannot be excluded under this reason.

- Health/Medical or Family Care - The participant is receiving medical treatment or providing care for a family member that precludes entry into unsubsidized employment or continued participation in the program. This does not include temporary conditions or situations expected to last for less than 90 days.

- Deceased - Self-Explanatory.

- Reservists Called to Active Duty - The participant is a reservist who is called to active duty for at least 90 days.

Partner Collaboration: This measure does recognize joint participation in WIOA services and non-

WIOA funded training programs when the WIOA or non-WIOA partner training activities are coordinated with the individual's WIOA Title I activities through a formal co-enrollment.

The concurrent enrollment must be included in the individual's WIOA service plan. This means that WIOA funded programs will be able to get credit for non-WIOA funded training in addition to WIOA funded training when the participant has exited all services funded by the program or funded by the partner program.

Documentation: All data and methods used to determine achievement of degrees or certificates must be documented and are subject to audit. Computer records from automated record matching are considered a valid written record. A telephone response from the participant must be accompanied by a written document such as a transcript, certificate, degree, or notice from the school. Any reason that excludes the participant from this common measure calculation must be fully documented in accordance with the State Data Validation policy.

See Adult/DLW Performance Measures in Section 11 – Attachment R

PROCEDURE FOR EMPLOYMENT RETENTION RATE PERFORMANCE MEASURE

Purpose

To address the employment retention rate from a WIOA Title 1 program perspective in Nebraska in light of the WIOA Common Measures still in effect during PY15 of WIOA.

Policy

Performance Measure Definition

Employment Retention Rate

Of those who are employed in the 1st quarter after exit:

$$\frac{\text{\# of Adults/DLWs employed in both the 2nd and 3rd quarters after the exit quarter}}{\text{\# of Adults/DLWs who exit during the quarter}}$$

Specific Requirements: Employment status at participant does not matter.

Employment in the 1st, 2nd and 3rd quarters may be with different employers.

Exclusions: Participants in the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter, will be excluded from the computation of this measure:

- Institutionalized - The participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain in that institution for at least 90 days. Individuals with disabilities (as defined in 29 CFR 37.4) residing in institutions, nursing homes, or other residential environments cannot be excluded under this reason.

- Health/Medical or Family Care - The participant is receiving medical treatment or providing care for a family member that precludes entry into unsubsidized employment or continued participation in the program. This does not include temporary conditions or situations expected to last for less than 90 days.

- Deceased - Self-Explanatory.

- Reservists Called to Active Duty - The participant is a reservist who is called to active duty for at least 90 days.

Partner Collaboration: This measure does recognize joint participation in WIOA services and non-WIOA funded training programs when the WIOA or non-WIOA partner training activities are coordinated with the individual's WIOA Title I activities through a formal co-enrollment.

The concurrent enrollment must be included in the individual's WIOA service plan. This means that WIOA funded programs will be able to get credit for non-WIOA funded training in addition to WIOA funded training when the participant has exited all services funded by the program or funded by the partner program.

Documentation: All data and methods used to determine achievement of degrees or certificates must be documented and are subject to audit. Computer records from automated record matching are considered a valid written record. A telephone response from the participant must be accompanied by a written document such as a transcript, certificate, degree, or notice from the school. Any reason that excludes the participant from this common measure calculation must be fully documented in accordance with the State Data Validation policy.

See Adult/DLW Performance Measures in Section 11 – Attachment R

PROCEDURE FOR AVERAGE EARNINGS PERFORMANCE MEASURE

Purpose

To address the average earnings from a WIOA Title 1 program perspective in Nebraska in light of the WIOA Common Measures still in effect during PY15 of WIOA.

Policy

Performance Measure Definition

Average Earnings

Of those who are employed in the 1st, 2nd, and 3rd quarters after exit:
Total post-program earnings (Quarter 2 and Quarter 3 after the exit quarter

---

# of Adults/DLWs who exit during the quarter

Specific Requirements: Wage records will be the only data source for this measure.

Programs that lead to employment in a non-covered industry may create a disadvantage since they are excluded.

Program that lead to part-time and seasonal employment may create a disadvantage.

Employment in the 1st, 2nd and 3rd quarters may be with different employers.

Exclusions: Participants in the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter, will be excluded from the computation of this measure:

- Institutionalized - The participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain in that institution for at least 90 days. Individuals with disabilities (as defined in 29 CFR 37.4) residing in institutions, nursing homes, or other residential environments cannot be excluded under this reason.

- Health/Medical or Family Care - The participant is receiving medical treatment or providing care for a family member that precludes entry into unsubsidized employment or continued participation in the program. This does not include temporary conditions or situations expected to last for less than 90 days.

- Deceased - Self-Explanatory.

- Reservists Called to Active Duty - The participant is a reservist who is called to active duty for at least 90 days.

Partner Collaboration: This measure does recognize joint participation in WIOA services and non-WIOA funded training programs when the WIOA or non-WIOA partner training activities are coordinated with the individual's WIOA Title I activities through a formal co-enrollment.

The concurrent enrollment must be included in the individual's WIOA service plan. This means that WIOA funded programs will be able to get credit for non-WIOA funded training in addition to WIOA funded training when the participant has exited all services funded by the program or funded by the partner program.

Documentation: All data and methods used to determine achievement of degrees or certificates must be documented and are subject to audit. Computer records from automated record matching are considered a valid written record. A telephone response from the participant must be accompanied by a written document such as a transcript, certificate, degree, or notice from the school. Any reason that excludes the participant from this common measure calculation must be fully documented in accordance with the State Data Validation policy.

See Adult/DLW Performance Measures in Section 11 – Attachment R

PROCEDURE FOR WIA/WIOA TITLE I FOLLOW UP SURVEY FOR EXITERS

Purpose

To address the procedures, timelines and questions involved in completing Follow-Up Services for all exited WIA/WIOA clients.

Policy

Unemployment Insurance (UI) wage records are to be used as the primary data source for wage related performance information on participants tracked in the NEworks system for the following measures:

1. Entered employment; and
2. Employment retention; and
3. Average Earnings; and

After all appropriate exiters have been run against the UI wage records, a list will be provided to each local area of the participants who are included in the denominator of each measure.

In addition, other information (non-wage related) which can come from supplemental sources must be collected through a follow up survey. The information gathered through the follow up survey which is not wage related must be recorded within 30 days of the end of the specified quarter after exit from the program.

> (For example, if their exit date was 12-02-05, the 1st Quarter after exit would be 01-01-06 to 03-31-06 which would make the data collection and recording due date 04-30-06, which is 30 days after the end of the 1st Quarter period).

All WIOA Title I participants who exit the NEworks system are required to be included in follow up with the exception of participants in the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter:

- Institutionalized
- Health/Medical
- Deceased
- Reservist Called to Active Duty
- Family Care

At a minimum, the case manager should run monthly reports regarding exits or view the selection grid on the follow-up screen in NEworks to obtain a list of all participants within the local area who need a contact. The case manager will contact each of the participants on their list and gather the program area specific information in the attached follow up survey. The information will then be entered into the Follow-Up Survey Screen in NEworks by the Data Due Date.

FOLLOW UP QUESTIONS FOR ADULT & DISLOCATED WORKERS

These questions are detailed in NEworks. Instructions for that system should be followed when completing the quarterly follow-ups.

GENERAL INFORMATION ON PERFORMANCE RESOURCES

Forms

Documentation is done through NEworks.

Approvals

Documentation is done through NEworks.

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 7

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

Financial

PROCEDURE FOR SERVICE AND OPERATIONAL PAYMENTS

Purpose

To provide guidance for service and operational payments.

Policy

1. Cost Considerations: The cost of goods or services must be both reasonable and competitive in price and authorized by the program for which they were purchased. When multiple options are available for receiving goods or services, documentation must show that a reasonable effort was made to determine the lowest competitive cost available was chosen. Requests for purchase of goods or services must comply with WIOA policy and directives.

2. Payment Procedures: All requests for payment of goods and services must include the following:
   a. Authorization for purchase/financial assistance on a Individual Training Account (ITA) voucher or Service Authorization form.
   b. Bill/invoice/mileage log (See Mileage Log in Section 11 – Attachment S), (etc.) listing the name and address of the vendor/client and goods/services provided.
   c. Fund and program incurring the cost and signature of Case Manager.

PROCEDURE FOR BILL PAYMENTS

Purpose

To provide general guidelines for bill payments.

Policy

Receipts, Bills and Invoices

1. MUST show:
   a. List of goods/services purchased
   b. Amount paid/due

2. Should be originals. **It should be a rare occurrence for the original receipt/invoice to be unavailable**. E-mailed copies are acceptable.

3. Verify that all goods/services were **purchased on or after the Issue Date**.

Client Reimbursement

- If reimbursing a client for items they have purchased, a copy of a signed receipt is sufficient. Example: the copy of their receipt that the store/vendor provides when paying with a credit card.

- To reimburse a client for ON LINE PURCHASES, include a copy of the credit card bill or some other type of documentation that proves the client ACTUALLY PAID for the items. A PAYMENT CONFIRMATION can be used if it shows the AMOUNT PAID. An **order confirmation cannot be used for reimbursement** because it only proves the client ordered the goods, not that the client paid for the goods.

- **IMPORTANT:** Clients will ONLY be reimbursed out of pocket expenses based on the **proof of payment** (receipt). The proof of payment amount may be different than the actual bill. Clients will NOT be reimbursed based on a bill/invoice. Clients will ONLY be reimbursed based on documentation that proves how much they actually paid.

    - Example: a certified driver's license (CDL) may cost $57.50. The client has a receipt that shows they paid $26. The CDL clearly states a cost of $57.50. The client will only be reimbursed $26 because that is what the RECEIPT indicated.

- The City can only reimburse individuals who have paid for goods. This includes WIOA clients who re-pay others who have paid for goods on their behalf.

- If the client paid for the goods or re-paid an individual for the goods, then the WIOA client can be reimbursed for the expenses:

- The WIOA client must prove that they have PAID the individual for the purchases made on their behalf and are now seeking reimbursement for them (the client). Submit a written receipt or statement, stating the participant has paid the purchaser for the items and the total amount of the items. Have both parties sign the receipt.

Third Party Reimbursement (when a non-client pays for goods)

- The City will NOT reimburse a WIOA client when a third party has paid but the WIOA client has not yet re-paid the third party. The WIOA client's intention to re-pay the individual is not sufficient for reimbursement to the WIOA client.

- If a third party paid for the goods and was not re-paid by the client, the third party (individual) must have an invoice/bill so the City can directly pay/reimburse this individual.

Tools/Equipment Invoices

- Submit ORIGINAL invoice.

- Submit the list of required tools from the school/instructor.

- MATCH the tools listed on the invoice with the list of tools from the school/instructor. WIOA can only pay for the tools/equipment that the Training Provider has designated as "required". **It is IMPORTANT** to match the specific items on the invoice to the items on the instructor's list.

- The client must sign the invoice to show they have received the tools/equipment. The case manager can confirm with the client through phone or e-mail that the goods were received. In this case the case manager should provide written confirmation (a copy of the email from the client or a document they devise) attached to the bill or on the invoice.

Support Service Payments

The maximum amount of support service payments during an individual's participation is $3,500. This amount may be exceeded with the approval of the Program Manager. Any single support service over $500 also needs the Program Manager approval.
Support service payments do not need to pay the entire cost of the service. Individuals may be required to pay a part of the cost of the service. Reasons for authorizing less than the full amount of the service include:

- To prevent depleting the maximum amount of support service payments available to the individual so that some support remains for the duration of their participation.

- Cost is in excess of support services maximum.

- Maximum amount of support services already authorized.

The Case Managers can request approval for support services from the Program Manager at any time. If the Program Manager is not available, the request can be made to the Department Director. Review the Operations Manual Section 12 for the complete Support Services Policy.

WIOA Spending Caps

Approval may be granted to allow the Service Provider to exceed the spending limits.
Review the Operations Manual (Section 5, page 47) for the procedure to request exceeding the limits.

Greater Lincoln :	
Training (YTA)	$10,000
Support Services	$3,500
Work Experience	500 hours max – can be exceed with approval

Individual Training Account (ITA) Voucher and Service Authorization Form

Purpose: The ITA and Service Authorization forms assist in the coordination of WIOA funded services provided to clients by vendors.

1. The ITA and/or Service Authorization form is sent to vendors to confirm that WIOA will pay for the services or products outlined in the document. These are services provided by a vendor to a WIOA client.

2. The vendor has no responsibility for the ITA and/or Service Authorization form and does not need to complete any information on it.

3. A copy of the ITA and/or Service Authorization form must be given to the vendor before the services outlined can be delivered to the client. The original ITA should remain in the client file until it is submitted with an original invoice to pay a bill. The original Service Authorization form is given to the vendor.

The YTA and Service Authorization serve 2 main functions:

1. To inform the vendor that the services outlined will be paid by WIOA.

2. To process invoices/bills that must be paid by WIOA.

You will enter the following information on the ITA:

Fund – Notate the funding source, i.e. Adult, Dislocated Worker.
Participant Name and Social Security Number (only the last 4 digits).
Program – Field of study or individual class name
Date Issued – Date the ITA is completed
Start Date – First day of class for specified term
Authorized for – Specify quarter/semester
Cost of Training – Enter approved amounts for each specific category

(See Individual Training Account in Section 11 – Attachment T)

You will enter the following information on the Service Authorization:

Participant Name
Fund – Notate the funding source, i.e. Adult, Dislocated Worker.
Program – Field of study or individual class name
Vendor – Enter the name of the provider where the client will receive training/goods/services.

Item – Enter specific services (tuition, books, uniforms, mileage, etc.) that the vendor is providing.
Amount – Enter the expected cost of the service listed. This amount may be estimated. Bills cannot be paid if they exceed the Total Amount Authorized. A revised Service Authorization must be resubmitted before payment can be made.

(See Service Authorization Form in Section 11 – Attachment U)

Revising (updating) an Individual Training Account (ITA) or Service Authorization Form
Fill out the form completely. Revised forms must be completely filled out in order to have an accurate accounting of the **total funds obligated for a client.**
Mark the form as "amended".

Vendors

- Vendors may be:
    - **Businesses/agencies** (Community Colleges, stores, etc.) that provide goods or services to clients.
      OR
    - **Private individuals** that provide goods or services to clients. This includes clients that receive reimbursements for out of pocket expenses.

- All Vendors must be registered in the City's JDE System before they can receive payment for services.

- If you do not know if a Vendor is in the JDE system, contact the Greater Lincoln Finance person.

- If a Vendor is new and needs to be added to the JDE System:

    1. Have the Vendor complete an IRS W-9 form.

    2. Submit the completed W-9 form with the bill paying documentation related to this Vendor/expense to the GL Finance person. If it is a payment to a client, be sure to include the client's phone number.

    3. City Finance will add the Vendor to their system once they receive the completed W-9 form.

PROCEDURE FOR WORK EXPERIENCE

Purpose

To provide guidance for clients participating in a Work Experience activity.

Policy

Definition

Work Experience (WE) is an intensive service that is a planned, structured learning experience. Its purpose is to provide a short-term or part-time work for a client who needs assistance in becoming accustomed to basic work requirements. Work experience is designed for individuals who have never worked or have been out of the labor force for an extended period of time. WE is intended to allow clients to develop, learn and practice good work habits and basic work skills.

Limitations

WIOA clients are limited to 500 total hours of work experience during their entire enrollment in the program. The Program Manager may increase this total under exceptional circumstances but under no circumstances will anything over 750 hours total be approved.

Case Manager's must request additional Work Experience hours over the 500 hour total by email. The email must contain an explanation of why the additional hours are needed in order to continue, i.e., Participant needs additional hours to work on their customer service skills. The request must specify how many additional hours are needed in order for the participant to accomplish the additional skill level.

Summer Youth Exception

A maximum of 240 hours of work experience is allowed each program year for WIOA summer youth programs which link work experience and academic learning. Summer youth program hours **do not** count against the program limitations in paragraph 3 above.

Worksite Agreement

Once a worksite is selected, the Case Manager will complete a Worksite Agreement (See Section 11 – Attachment V) with the worksite supervisor and provide an orientation of the program. The orientation will include WE timesheets (Section 11 - Attachment W), instructions on its use and timelines for its submission. The original copy of the Worksite Agreement will be maintained in the client file and the worksite will retain a copy.

Client Orientation

The client will be provided an orientation of the worksite including work rules or policies and the WE payroll system. The client must complete the following:

a. City of Lincoln Post Employment Information form (See Section 11 – Attachment X)
b. I-9 Form (See Section 11 – Attachment Y)
c. City of Lincoln ADA Interviewing Requirements form (See Section 11 – Attachment Z)
d. W-4 form (See Section 11 – Attachment AA)

e. Direct Deposit or Debit Card Authorization form (See Section 11 – Attachment AB & AB.1)

The WE checklist sheet (Section 11 - Attachment AC) and the above paperwork need to be submitted to the OSES Finance person on the first day the client starts working in order to get the client enrolled in the City Payroll system.

Payment Procedures

WE clients are considered employees of the City of Lincoln and will receive a pre-determined wage but not less than the Federal minimum wage. Any WE wage above the Federal minimum will require prior approval of the Program Manager. The WIOA program and not the worksite cover payroll, Social Security and Workers Compensation expenses. WE clients do not receive sick leave, holiday pay, and vacation time or overtime and may work no more than 40 hours per week. WE clients may be paid for hours worked on a holiday if the Case Manager verifies with the worksite supervisor that the worksite was operational and the hours were in fact worked. The WE payroll is biweekly and on the same schedule as the City payroll. After the WE timesheet is signed by the client and worksite supervisor and submitted to One Stop Employment Solutions, the signed WE timesheet, complete with the client name, client signature and supervisor signature, will be sent to the One Stop Employment Solutions (OSES) Finance person no later than 12:00 p.m. on Thursday of payroll week (except where holidays occur and payroll deadline is moved back). Client paychecks will be issued at the same time as City employee paychecks are.

Lost or Stolen Paycheck

Upon notification of a lost or stolen paycheck, the Case Manager will notify the OSES Finance person. City Payroll will issue an Affidavit form that the client will need to complete. When the Affidavit is completed, it will be sent to City Payroll to initiate a duplicate payment. A waiting period of 10 days, from mailing date, is required prior to submission of the Affidavit.

Workers Compensation

Workers Compensation insurance for WIOA clients is provided through the City's Risk Management Division. If serious injury or illness, call 911 or go to the nearest hospital. Within 24 hours of the injury/illness, the worksite supervisor needs to complete the City's "Report of Alleged on the Job Injury or Illness" form and the "Employee Injury or Illness Report" form. Turn these forms in to the OSES Finance person.

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 8

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

NEworks, Data Entry & Documentation

PROCEDURE FOR NEworks DATA ENTRY

Purpose

To outline the procedure for data entry into the State MIS system NEworks.

Policy

Information on data entry into the NEworks system can be found on at the following location in NEworks. Data entry information will not be duplicated in this manual.

Other Staff Services
- Staff Online Resources
  - WIOA – Information on the WIOA changes
  - Staff – How to guide
    - User guide for Staff
      - Section 6: Programs – WIOA
    - My Staff Account
    - WIOA Program

See an Overview of the WIOA Application in Section 11 – Attachment AD.

ACTIVITY CODES– Adult/DLW Service Codes

NO	Activity	Activity Description
102	Initial Assessment	Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service needs.
107	Provision of Workforce and Labor Market Information	Provision of workforce and labor market employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including; job vacancy listing in labor market areas; information on job skills necessary to obtain the vacant job listed; information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for those jobs.
125	Job Search and Placement Assistance	Labor exchange services may be provided through self-service, facilitated self-help service and staff-assisted services.
138	Career Counseling	Labor exchange service,; includes: Provision of information on in-demand industry sectors and occupations; and provision of information on non-traditional employment.
180	Support Service – Child/Dependent Care	Provision of referrals to and coordination of activities with other program and services, including those within the one-stop delivery system and when appropriate, other workforce development programs.
181	Support Service – Transportation Assistance	Provision of referrals to and coordination of activities with other program and services, including those within the one-stop delivery system and when appropriate, other workforce development programs..
182	Support Service – Medical	Provision of referrals to and coordination of activities with other program and services, including those within the one-stop delivery system and when appropriate, other workforce development programs..
184	Support Service – Housing	Provision of referrals to and coordination of activities with other program and services, including those within the one-stop delivery system and when appropriate, other workforce development programs.
185	Support Service – Other	Provision of referrals to and coordination of activities with other program and services, including those within the one-stop delivery system and when appropriate, other workforce development programs.
186	Support Service – Seminar/Workshop Allowance	Provision of referrals to and coordination of activities with other program and services, including those within the one-stop delivery system and when appropriate, other workforce development programs.

187	Support Service – Job Search Allowance	Provision of referrals to and coordination of activities with other program and services, including those within the one-stop delivery system and when appropriate, other workforce development programs.
200	Individual Counseling	Individual counseling and mentoring.
201	Group Counseling	Group counseling and mentoring.
202	Career Planning	The provision of a client-centered approach in the delivery of services, designed – (A) to prepare and coordinate comprehensive employment plans, such as service strategies for participants to ensure access to necessary workforce investment activities and supportive services using where feasible, computer-based technologies, and (B) to provide job, education and career counseling, as appropriate during program participation and after job placement.
203	Comprehensive and Specialized Assessments	Comprehensive and specialized assessment of the skill levels and service needs of adults and dislocated workers, which may include – Diagnostic testing and use of other assessment tools; and in-depth interviewing ad evaluation to identify employment barriers and appropriate employment goals.
204	Interest/Aptitude and Skills Testing	
205	Individual Employment Plan (IEP)	Identifies the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of and information about eligible training providers.
206	Referral to Apprenticeship	
207	Referral to Job Corps	
208	Referral to Other Federal (Non-WIOA) Training	
209	Referral to State/Local Training	
210	Referral to Educational Services	
211	Referral to WIOA	
212	Other Intensive Services Not Otherwise Classified	
213	Financial Literacy	Services include – (A) supporting the ability of participants to create household budgets, initiate savings plans, and make informed financial decisions about education, retirement, home ownership, wealth building, or other savings goals; (B) supporting the

		ability to manage spending, credit, and debt, including credit card debt, effectively; (C) increasing awareness of the availability and significance of credit reports and credit scores in obtaining credit, including determining their accuracy (and how to correct inaccuracies in the reports and scores, and their effect on credit terms; (D) supporting the ability to understand, evaluate, and compare financials products, services and opportunities, and (E) supporting activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials.
215	Short-Term Prevocational Services	Development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment of training in some instances pre-apprenticeship programs may be considered as short-term pre-vocational services.
216	Out-of-Area Job Search/Relocation Assistance	
217	Supportive Service – Relocation Assistance	
218	Internship – Paid	A planned, structured, time-limited learning experience that takes place in a workplace, may be paid or unpaid, as appropriate. An internship may be in the private for profit sector, the non-profit sector, or the public sector.
219	Work Experience	A planned, structured learning experience that takes place in a workplace for a limited period of time and is linked to careers. Paid and unpaid work experience opportunities and other employment opportunities available such as: (A) pre-apprenticeship programs; (B) internships and job shadowing, and: (C) on-the-job training opportunities. A work experience workplace may be in the private for profit sector, the non-profit sector, or the public sector.
220	Workforce Preparation	Activities that help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-=management skills, including competencies in utilizing resources, using information, working with others, understanding systems, obtaining skills necessary for successful transition into and completion of postsecondary education or training or employment.

222	English Language Acquisition	English language acquisition and integrated education and training programs.
226	Reading and/or Math Testing	
300	Occupational Skills Training – Approved Provider List (ITA)	OST provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupation fields at entry, intermediate or advanced level. Local areas must give priority consideration to programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area. OSTs must 1) be outcome-oriented and focused on an occupation goal specified in the ISS; 2) be of sufficient duration to impart the skills needed to meet the occupational goal; and 3) result in attainment of a recognized post-secondary credential.
301	On-The-Job Training	Training by an employer that is provided to a paid participant while engaged in productive work in a job that (A) provides knowledge or skills essential to the full and adequate performance of the job; (B) is made available through a program that provides reimbursement ot the employer of up to 75 percent of the wage rate of the participant except as provided in section 134(c)(3)(H), for the extraordinary costs of providing the training and additional supervision related to the training, and (c) is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant and the service strategy of the participant as appropriate.
302	Entrepreneurial Training	Provides the basics of starting and operating a small business. Such training must develop the skills associated with entrepreneurship and include, but not limited to, 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 acquirement capital and the trade-offs associated with each option; and (5) Communicate effectively and market oneself and one's ideas
303	Distance Learning	
304	Customized Training	Used to meet the special requirement of an employer or group of employers, conducted with a commitment by the employer to employ all individuals upon successful completion of training, The employer must pay for a significant share of the cost of the training.

		Employed workers to must meet eligibility requirements in order to receive customized training. There may be instances where a worker is employed but then received customized training under contract between the local area and the employer. In order for the employed worker to qualify, the employee must not be earning a self-sufficient wage as determined by Local Board policy, the requirement of customized training must be met, and the training must incorporate new technologies, processes, or procedures, skills upgrades; workplace literacy, or other appropriate purposes, as identified by the Local Board.
311	Enrolled in Job Corps	
312	Enrolled in Other Federal Training	
313	Enrolled in State/Local Training	
314	Enrolled in Apprenticeship Training	
320	Registered Apprenticeship	
323	Workplace Training & Cooperative Education	
324	Adult Education w/ Occupational Skills Training – Approved Provider	
325	Skill Upgrading and Retraining	
326	Support Services – Needs Related Payments	Assistance with needs related payments.
328	Occupational Skills Training (Non-ITA) Partner Training	
340	Job Readiness	

ENROLLMENT CLOSURE – PROGRAMS TAB – DEFINITIONS FOR EXITS

Exit	Definition
Institutionalized	Participant is residing in an institution or facility providing 24- hour support such as a prison or hospital and is expected to remain in that institution for at least 90 days.
Health/Medical	Participant is receiving medical treatment that precludes entry into unsubsidized employment or continued participation in WIOA. (Does not include temporary conditions expected to last for less than 90 days).
Deceased	Participant found to be deceased or no longer living.
Soft Exit	Participants who do not receive any WIOA funded service for 90 days and are not scheduled for future services except follow-up services will be issued a soft exit by the system. Participants who have a planned gap in service of greater than 90 days should not be considered as exited if the gap in service is due to a delay before the beginning of training, a health/medical condition, providing care for a family member with a health/medical condition, or a temporary move from the area that prevents an individual from participating in services. Service providers must document any gap in service that occurs and indicate the reason for the gap in service. Notify the State NEworks staff of any gap over 90 days with the person's name, social security number, length of gap and reason for the gap to allow the participant to be excluded from receiving a soft exit. Soft exits are only issued by the system and occur on the 5th working day of every month.
Reservist	Participant is a member of the National Guard or a Military Reserve Unit and is called to active duty for at least 90 days and chooses not to return to WIOA.
Family Care	Participant is providing care for a family member with a health / medical condition that precludes entry into unsubsidized employment or continued participation in the program. This does not include temporary conditions expected to last less than 90 days.
Invalid Social Security Number	Participant either disclosed an invalid Social Security Number or chose not to disclose a Social Security Number.

PROCEDURE FOR NEworks ENTERING ACTIVITIES

Purpose

To give the procedure for Activities with NEworks.

Policy

If you come across a program from an provider that is not listed among the choices, please submit an email with the following information to NEworks Regional Expert.

- Program
- Credential
- Length
- FEIN # (if not already listed on Training Link)

Creating Activity

General Information
The available options in the **Customer Program Group** drop-down list are populated based upon the individual's previously determined eligibility. Your selection in this field determines available options for activity codes and fund streams.

Enrollment Information
Check the **WIOA Title II – Partner program** checkbox if this activity if begin provided by a WIOA partner. WIOA Title II programs provide adult education and literacy instruction. If *Yes* is selected, it indicates that the funding for the activity is being provided by the partner program and no fund tracking will occur, and you will be prompted to **Select a Partner** from the drop-down list to chose from a list of WIOA Title II partners.

Partners include: Voc Rehab, NAF, ABE, WP

Enrollment Cost Tab – Optional

Because this page reloads to display more options based upon your previous selections in data fields, it is important to complete this enrollment form from the top down.

This section contains information about the activity's cost. Enter figures in the fields available; the cost fields that are displayed are dependent upon the type of activity you are enrolling the individual in, and the service provider's record.

The system will perform calculations automatically after figures are entered into any of the Training Costs fields.

Click the *Next* button to proceed to the next step of the enrollment. The system will validate the data you have entered and inform you of any errors, if necessary.

Financial Aid Tab – Optional
Click the button beside the answer for whether or not this individual and service/program is

Financial Aid Applicable. If you select *Yes*, the page will reload to show additional financial aid data fields.

The **Enrollment Summary** lists information about the individual and activity and is displayed for your reference.

The **Total Enrollment Cost** and **Total Existing Planned Cost** are displayed for your reference, but are not able to be modified from this screen.

Click the **Add Financial Aid** link to add information about any financial aid that the individual is/will be receiving. A pop-up window will appear that lets you choose from a list of financial aid programs (suchas Pell Grants and Stafford Student Loans).

Adding Financial Aid – Optional
Click on the appropriate financial aid program individual is receiving. The Program will then appear for you to choose if that will be applied toward service Cost or toward Participant.

Choose a Status of pending (estimate) or awarded and indicate the total amount awarded and then the amount that will be toward the service cost (if any).

Enter information about the amount of financial aid, as applicable. When you are finished, click the *Calculate* button to update the cost information on the page.

The system will populate the **Total Financial Aid Contribution** and **New Planning Cost** fields base upon your financial aid entries.

Click the *Next* button to proceed to the next step of the enrollment. The system will validate the data you have entered and inform you of any errors, if necessary.

Budget Planning Tab – Optional
The following information is generated by the system and displayed for your reference and will assist you with Planned Obligations and what this individual may need with WIOA:

- **Total Planned Enrollment Cost** - The total costs from the Enrollment Costs tab; the sum of all total costs for this enrollment.

- **Total Financial Aid Contribution** - The total of all streams of financial aid which are applicable towards service costs. This does not include amounts that are applicable directly to the participant. This information is found on the Financial Aid tab.

- **Total Planned Costs After Contribution** - The Total Planned Enrollment Costs minus Total Financial Aid Contribution.

- **Total Funded Costs** - Total of all allocations for the enrollment from fund streams and time

periods. This is the amount that will be paid by the program from available fund streams. These amounts are shown in more detail further down this page.

- **Total Obligations** – not available at this time.
- **Total Paid Obligations** – not available at this time.
- **Total Outstanding Obligations** - not available at this time.
- **Total Funded Costs to be Obligated** - not available at this time. .
- **Total Costs to be Funded** - not available at this time.

Following the Enrollment Summary is information about financial transactions against the fund stream that has been attached to this activity and is not available at this time.

Click the *Next* button to proceed to the next step of the enrollment. The system will validate the data you have entered and inform you of any errors, if necessary.

All optional items if not utilized in NEWORKS are required to be scanned into ECM.

PROCEDURE FOR ELECTRONIC CASE MANAGEMENT

Purpose

To establish the Local Area policy regarding electronic file storage and documentation imaging standards in the administration of the Workforce Innovation and Opportunity Act (WIOA), under the integrated Management Information System (MIS), NEworks and Enterprise Content Management (ECM) system.

Policy

One Stop Employment Solutions will comply with the state's policy on Enterprise Content Management.

The state has established a standard for an electronic file (e-file) which includes a paperless registration, eligibility determination, and program enrollment. The e-file will be established through the state integrated Management Information System (MIS), NEworks, and Enterprise Content Management (ECM) system. Optional usage of ECM and adherence to the **Nebraska Department of Labor NEworks, Electronic Case Management and Enterprise Content Management Policy** will begin January 1, 2012.

This time of optional usage will allow program staff to begin utilizing the new technology and become familiar with the functionality and state policy governing such process.

Effective July 1, 2012, all new program enrollments will be required to be completed in an e-file format which adheres to the **Nebraska Department of Labor NEworks, Electronic Case Management and Enterprise Content Management Policy**.

This will result in creating a real time environment for storing and viewing applicant verification and eligibility determination documents. Authorized personnel will be required to scan, import, and save all verification documents at the time they are being reviewed during the application process and prior to selecting the verification type on the application in NEworks per distinct program requirements. Any individual or entity who applied to a federally funded program prior to July 1, 2012, and had their program information stored in a hard copy file, will have their current application, eligibility determination and documentation stored in that hard copy file through the life of the enrollment.

Additionally, applications will be entered in a timely manner. NEworks is designed for live applications, allowing for entry as the process occurs. When information is collected by workers for the purposes of WIOA, including equal opportunity information, the application must be entered in real time. A record of those individuals seeking service but not receiving service is maintained through the process of closing out those applications in NEworks. This is done by utilizing a "closed/not enrolled" option in NEworks prior to enrollment. Greater Lincoln will enter data into ECM and NEworks beyond the application process. Activity and closure dates will be entered to ensure that they are an accurate (match) depiction of service.

Conversations, counseling, assistance in identifying a career goal and provider for training to be sponsored by WIOA funds; discussions of WIOA funds; referral to employers for hire with the intent to follow with a WIOA funded training contract are all services funded by the WIOA program and

must be case noted in WIOA, logged as activities in WIOA as appropriate and conducted with the client after participation.

Definition of an E-File

E-File for purposes of this policy, and all programs related to this policy, will refer to a program applicant's file comprehensively stored in an electronic format. The program application, related activities, case notes and all other relevant individual/entity information are captured and stored solely in the State integrated MIS, NEworks, while all documentation and eligibility verifications specific to each applicant are scanned and stored in the Enterprise Content Management system.

For all new program applicants beginning July 1, 2012, a complete electronic file must be maintained. The contents of an individual, or entity, E-file shall be determined based on the requirements of each distinct program. Accepted methods for producing an e-file consist of:

- Scanning and importing a document into ECM
- E-forms developed in accordance to their individual workflows
- Extracting images from other state agency e-file programs

Roles & Responsibilities

All legal and verification documents will be scanned, imported, reviewed, and saved by the Program Staff personnel, at the time the verification is conducted as stated in the **Nebraska Department of Labor NEworks, Electronic Case Management and Enterprise Content Management Policy.**

***Communication Workflow* -** Each region, or local area, is assigned a Regional Expert who has been fully trained in the ECM process. Any system and scanning inquiries should first be communicated to the Regional Expert. If the Regional Expert is unable to resolve an issue, it will be the responsibility of the Case Manager to then present that issue to the OSES Program Manager. A list of Regional Experts is located on the Staff Online Resource page of NEworks. To update this information, please contact the System Administrator.

ECM Practices:

• ECM Access

ECM access for all users shall be requested via the Nebraska Department of Labor NEworks/ECM – Access Request Form. This form must be completed and submitted to the Office of Employment and Training. If approved, confirmation will be provided to the requesting manager along with initial login credentials. Access to the ECM system using the link provided by NDOL and will do so using their own personal and unique login information. Login information is not to be shared with any other personnel in accordance with the Confidentiality Policy.

• Scanned Image Legibility

Any and all pertinent documentation that is scanned is required to be legible in view and printed form. Illegible images must be removed and the document must be rescanned until a legible

image has been captured.

- **Deleting Images**

Under no circumstances will personnel be allowed to delete an image that has already been saved to an applicant's electronic file. The process of deleting an image that has already been saved to an applicant's electronic file can only be performed by the System Administrator. Requests to delete images may be submitted, via the ECM/NEworks Record Correction Form, to the System Administrator if the following scenarios exist: 1) an image has been saved to an incorrect program applicant's file or 2) an image has been saved under an incorrect document type.

- **E-Form Process**

A variety of Electronic Forms will be used in accordance with the Enterprise Content Management system. E-Forms allow users to complete forms electronically and provide an electronic signature to confirm receipt and review of the information captured in the form by qualified staff or management personnel. Each E-Form will need to follow its designated workflow process to ensure all required electronic signatures have been obtained as well as the form passing through each stage of the process as outlined. Any misrepresentation of the electronic signature process, by program staff or management, could result in disciplinary action up to and including termination. WIOA, under this policy will establish a workflow for each eform relevant to its specific programs.

Electronic Signature

A method of signing an electronic document that identifies and authenticates a particular person as the source of the message and indicates such person's approval of the information contained in the electronic message. Electronic signatures will be generated via signature pads with scanned copies being accepted in limited situations; such as remote or video case management. The electronic signature may be embedded in the content of the record, or it may be stored separately. If an electronic signature technology separates the signature from the rest of the record, it must be associated in some way and captured in the recordkeeping system to preserve the complete content of the record. In accordance with Neb. Rev. Stat. § 86-611 and Title 437 of the Nebraska Administrative Code, the participant must acknowledge and electronically sign a Participant Enrollment Signature Sheet if and when the OSES program elects to utilize the electronic signature function

Program Monitoring

Use of Enterprise Content Management in accordance with the **Nebraska Department of Labor NEworks, Electronic Case Management and Enterprise Content Management Policy** provides for all monitoring to be performed remotely and upon request. Information will be readily available due to the real time entry of all documentation making applicant files current and up to date at all times during the process. State monitors, auditors, and Federal review officials will request access to the ECM system via the Nebraska Department of Labor NEworks/ECM – Access Request Form, and submitted to the Office of Employment and Training. If approved, confirmation will be provided to the requestor along with necessary links and initial login credentials. Access will be provided on a permanent or temporary basis depending on business need.

Record Retention

The required length of retention for all contents of an E-File shall be determined per the guidelines for WIO A program records retention.

Confidentiality

All authorized personnel will be assigned a unique and personal username and temporary password to login to the Enterprise Content Management system. Each personnel member will then create their own unique and personal password in accordance with the password criteria provided upon initial login. For confidentiality purposes, this unique and personal login information shall not be shared with any other person, nor will any other person be allowed to perform any actions using this login other than the person to whom the login is assigned. Failure to comply with the Confidentiality Policy could result in disciplinary action up to and including termination. In addition, some personnel will assign an electronic signature to various documents for approval. Any misrepresentation of this electronic signature could also result in disciplinary action up to and including termination.

CASE NOTES / DOCUMENTATION

- **All conversations and events should be documented as soon as possible after their occurrence (at the end of a phone conversation, at the end of a day, or immediately after a client leaves the appointment).**

- **Document facts that directly relate to the goals and objectives of the ISS, including dates of services, attendance, outcomes and evaluation techniques.**

- **Document all successes and show how they are linked to the service plan (ISS).**

- **A copy of any credential, certificate, grade, and/or progress report obtained should be placed in the electronic case file and annotated as well as any other records and notes forwarded from other professionals.**

Case notes resulting from a face to face meeting or conversation with the client should include:

- A description of the context of the conversation/interview (ex. responded to case manager's request for a meeting)

- The purpose of the conversation (ex. to discuss grades; enroll in classes next semester, etc.)

- Your observations (appearance, attitude, etc.)

- Content of the conversation (summary of the issues raised by the client or case manager)

- Outcome (Was the purpose of the meeting achieved? Were other objectives achieved?)

- Impression and assessment

- Plans for next steps or next meeting

Case notes resulting from "second-hand" information (instructors, employers, family members, etc.) should include:

- The source of the information (family member, school, other service agency, etc.)

- The person's name

- Date information was received

All case notes should be logged in NEworks. In special circumstances case notes may be scanned into ECM.

PROCEDURE FOR PROGRAM CASE CLOSURE

Purpose

To provide guidelines for entering closure dates for individuals who have completed WIOA services.

Policy

A WIOA Case Closure or program closure can be created after all open WIOA enrollment activities are closed. A system exit will occur 90 days following the closure date if a participant has not received a program service for 90 days and is not scheduled for further services except follow-up services. The date of program closure will be the last date a service was received so in most cases the exit date will revert back to the closure date.

However, if the individual is enrolled in another program in NEworks such as Wagner-Peyser or Trade the exit date will be the last date of service from any of these programs. Consequently the exit date may NOT be the same date as the closure date from WIOA.

Once the case closure has been created a new program activity cannot be created for this application. However follow up services may be recorded. If a new activity needs to be entered within the 90 days after the case closure has been entered, the case closure must be deleted before a new activity may be created.

PROCEDURE FOR PROGRAM EXIT

Purpose

To provide guidelines for exiting individuals who have completed WIOA and partner services.

For detailed information on Program Exits, see NDOL Policy “Program Exit” dated 1/11.

Policy

Program Exit: The term program exit means a participant does not receive a service funded by the program or funded by a partner program for 90 consecutive calendar days and is not scheduled for future services.

Date of Exit: Represents the last day on which the individual received a service funded by the program or a partner program.

Services: Includes all services except holding, a determination of eligibility to participate in the program, self-directed job search that does not result in a referral to a job, services and activities specifically provided as follow-up services or regular contact with the participant or employer to only obtain information regarding his/her employment status, educational progress, need for additional services or income support payments (except for trade readjustment allowances and other needs-related payments funded through the TAA program or NEGs). All of the services given an Activity in NEworks, except Holding, are applicable in meeting this definition.

Planned Gap in Service: Participants who have a planned gap in service of greater than 90 days may not be considered as exited if the gap in service is due to: a delay before the beginning of training; a health/medical condition or providing care for a family member with a health/medical condition that prevents an individual from participating in services; or a temporary move from the area that prevents the individual from participating in services. Service providers must document any gap in service that occurs and indicate the reason for the gap in service. To keep a soft exit from happening, the State NEworks staff must be notified of any gap over 90 days with the person's name, last 4 digits of their social security number, length of gap and reason for the gap. The service provider will submit the information to the to the State NEworks staff.

Partner Programs: To encourage service integration and recognize shared contributions toward performance outcomes, workforce programs can share accountability when the participant has exited all services funded by the program or funded by a partner program. The NEworks system is designed to allow Local Area staff to track and report on training that WIOA participants receive from partner programs. When an Activity for Partner Training has been entered, individuals no longer receiving WIOA Title I-B services are able to avoid facing a soft exit. The Partner Training activity is the only vehicle that allows for tracking the beginning and end of a service as it applies to a WIOA exit. Thus, the point of exit shall occur on the last date of service funded by WIOA Title I-B unless Partner Training is marked. It is important that the partner training be coordinated with the individual's WIOA Title I-B activities. When an individual obtains training on his/her own and does not coordinate with the WIOA activities, then Partner Training is not to be used.

PROCEDURE FOR NEworks ENTERING FOLLOW-UP

Purpose

To give the procedure for Follow-Up within NEworks.

Procedure

A NEworks Case Closure occurs once all WIOA Youth Services have concluded. A NEworks Exit occurs when no WIOA Youth Services and/or Partner Services have occurred for 90 days or are scheduled to occur. Follow-up services begin once a NEworks Exit occurs. Since there is the possibility that the WIOA Case Closure and WIOA Exit might not occur on the same date, Case Managers are encouraged to maintain contact with clients at least on a monthly basis until follow up begins.

Follow-up services should be directed to ensure that the participant successfully meets their planned outcome goals and to insure successful outcomes on the WIOA performance measures. A wide range of services may be provided during follow-up without re-enrolling the participant into WIOA.

WIOA services that would require re-enrollment into WIOA are work experience, internships, job shadowing, and occupational training including on-the-job training and classroom training.

NEworks HIT LIST PROCESS

Purpose

To provide the procedure for reviewing Hit Lists.

Procedure

- The hit lists are those individuals in NEworks who are counted within each performance measure and sent to the regions for review (for example: is anyone missing? Is someone counting in the credential measure and should not be? etc).

- The Hit lists is the Local Area's last chance to double check those that are counted in performance based on the date range for the Program year.

- Case Managers will need to review the Hit Lists and make sure all clients counting toward the particular measure are accurate and reflecting what is entered into the NEworks system as well as what they know to be true and accurate outside of the system.

- Average Earnings and Retention rate information is pulled directly from Unemployment Insurance (UI) information and data. This information the Local Area cannot impact or double check.

Common questions:

Case Manager Questions:

- Does the client have employment? Did they enter education?

- If the client did how is it reflecting on the Hit List?

Do these need record corrections?

- The hit lists are those individuals in NEworks who are counted within each performance measure and sent to the regions for review (for example: is anyone missing? Is someone counting in the credential measure and should not be? Etc).

- They will not require records corrections unless the information that is in NEworks is incorrect. Referring to activities that are not entered accurately reflecting the services and employment plan for the client.

Supplying information to the NEworks Administrator or Administrative Entity by saying "this is incorrect" is not sufficient. Case Managers are expected to understand who counts towards the different performance measures, who are exiting, who has exited and what activities or services the case managers can provide to ensure successful outcomes for their clients.

Which fields indicates the client's education/employment at Exit on the Employment/Education tab?

- The numerator column will provide you the status at exit.

- If the individual is counted in the Numerator column then the individual was successful in finding employment or continuing on to education.

- If they are not counted and only reflect in the denominator column, they have not been successful in finding employment and/or are not continuing on to education.

PROCEDURE FOR CORRECTION OF RECORDS

Purpose

This policy is written to ensure the data submitted in the Annual Report is indeed "complete and accurate." It also spells out the steps to take when it is appropriate and necessary to correct data.

Policy

What Counts and Does Not Count for Performance

§666.140(a)(1) "The core indicators of performance apply to all individuals who are registered under 20 CFR 663.105 and 664.215 for the adult, dislocated worker and youth programs, except for those adults and dislocated workers who participate exclusively in self-service or informational activities." (2) "Self-service and informational activities are those core services [refer to Core Services policy] that are made available and accessible to the general public, 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 situation, and that do not require significant staff involvement with the individual in terms of resources or time."

An individual who is given a NEworks participation date shall count toward performance (unless they are later given an exit code that qualifies them as an exclusion). Adults and dislocated workers who only receive self-service and informational activities should not be given a NEworks participation date.

Individuals in the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter, are considered exclusions. These include:

- Participants who have been incarcerated or institutionalized with expectations to remain in that institution for at least 90 days;
- Participants who die;
- Participants receiving treatment for a health/medical condition that precludes entry into unsubsidized employment or continued participation in WIA. This code does not include temporary conditions expected to last for less than 90 days; and
- Participants providing care for a family member that precludes entry into unsubsidized employment or continued participation in WIA. This code does not include temporary conditions or situations expected to last for less than 90 days;
- Participants (youth only) in the foster care system or any other mandated residential program that has moved from the area as part of such a program; and
- Participants who are reservists called to active duty for at least 90 days who choose not to return to WIA.

When Data Should be Corrected

Duplicate Records: The NEworks allows for users to print a "Duplicate Records" report. This report identifies individuals on NEworks with duplicate Social Security Numbers. In some cases, the records are valid and should be left as is in the system. For example, some individuals may have started the program, exited, but later in the same program year re-entered the same program.

However, some records are duplicates of the same participant in the same funded program for the same time period. In these instances, it is necessary to remove the duplicated records.

Errors Identified through WIASRD Edit Checks: One of the required reports the State must submit electronically each year is the WIA Standardized Record Data (WIASRD). Prior to submitting this report, an edit check is made. Information that shows up as errors in the edit check must be corrected. Often this edit check process catches human errors in inputting the data, i.e., dates out of the appropriate timeframes.

Errors Identified by through Local Area Quality Control: When the local area discovers inaccurate information during their quality control process, the local area must submit a record correction per the process identified in the State NDOL Correction of Records in the State's Integrated MIS, NEworks Policy updated 6-01-2012.

When Data Should Not Be Corrected

To Improve Performance: The NEworks system allows local areas to monitor performance throughout the year. The "Correction of Records" process must not be used to enhance performance by deleting records of participants who have appropriately received a NEworks participation date. [Note: Adults and dislocated workers receiving only self-service or informational activities (as discussed earlier) who are only given a NEworks registration date are properly excluded from the WIA title IB performance measures.]

To Distort Actual Events: The Federal Research and Evaluation Databases (FRED) enables analysis of the WIASRD data and is available at http://www.fred-info.org/. Suppliers of data used for research studies must meet guidelines published on September 12, 2003 to implement the Federal Policy on Research Misconduct and should be aware of the following definitions:

> "Fabrication means making up data or results and recording or reporting them;" and
> "Falsification means manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research record is not accurately represented in the research record."

Processes for Correcting Data

Process for Correcting Participant Data Prior to Annual Report Submittal: When a Case Manager realizes there has been an error made to the NEworks participant file, he/she needs to document what has happened. This documentation needs to then be sent to the OSES Program Manager. The OSES Program Manager will review the request and forwards it to the NEworks Administrator if approved. This will take place through the ECM automated system. [Each local area must have on file at the State Office of Employment and Training a letter signed by the local Workforce Investment Board Chair or Chief Elected Official stating the name of the authorized person who represents the administrative entity for the purpose of submitting Corrections of Record.]

The NEworks Administrator may:

- Check the accuracy of the computerized records against the original source using scanned copy documentation;

- Make call backs to participants or contact other sources (i.e. Case Manager) to verify the accuracy of information collected.

- If the NEworks Administrator, after reviewing the documentation, agrees the change is necessary, then he/she forwards the documentation to the appropriate authority via ECM. The final decision for either approval or disapproval is determined by the Executive Director of the Office of Employment & Training. If it is approved, then the NEworks Administrator goes forward with the correction process. If the correction is not approved, then the NEworks Administrator notifies the OSES Program Manager. The OSES Program Manager has the opportunity to Appeal the decision.

Correcting Data Already Submitted in the Annual Report: Changes to data already submitted in the Annual Report may only be made as allowed by federal reporting and data validation requirements.

Appeal Process

The State always has the right to refuse to change information listed on NEworks. However, there is an appeal process for local areas denied the opportunity of changing information. To appeal the denial, the local area must:

- Submit a written request for a hearing within 30 days of denial notification to the Nebraska Workforce Development Board (NWDB).

The State Workforce Development Act Liaison (or his or her designee) shall conduct a hearing within 30 days of receipt of the request for the hearing.

The hearing shall include the reason(s) as to why it is necessary to delete the information, documentation verifying the need, and a listing of the reason(s) the State gave for the denial.

- Within 10 days of the hearing, a final judgment by the State Workforce Development Act Liaison shall be rendered.

- A copy of said decision shall be forwarded to the Executive Committee of the NWDB.

Documentation

Reason Did Not Continue Service: On the WIOA Application and Registration form, there is a section for identifying the reason an applicant did not continue the application process. When an individual starts the application process for WIOA, but drops out of the process prior to receiving a NEworks participation date, he/she does not become a WIOA participant. The reason the applicant did not continue service should be identified.

Responsibility for Tracking Services: "Each recipient must collect and maintain records to determine whether the recipient has complied or is complying with the nondiscrimination and equal opportunity provisions of the WIOA. Records must be collected and maintained on applicants, registrants, eligible applicants/registrants, participants, terminated individuals, employees, and applicants for employment." [Equal Opportunity and Nondiscrimination policy]

Record Keeping: Documentation for the "correction of records" action shall be maintained at the Office of Employment & Training, for a minimum of three years following the date on which the annual expenditure report containing the final expenditures charged to such program year's allotment is submitted to the U.S. Department of Labor. However, if any litigation, claim, negotiation, audit, or other action involving the records starts before the expiration of the three-year period, the

records must be retained until completion of the action, and resolution of all issues which arise from it, or until the end of the regular three year period, whichever is later.

PROCEDURE FOR MONITORING

Purpose

The State must conduct regular oversight and monitoring of its WIOA activities and those of its sub-recipients and contractors in order to:

- Determine expenditures have been made against the cost categories and within the cost limitations specified in the Act and regulations;
- Determine whether or not there is compliance with other provisions of the Act and regulations; and
- Provide technical assistance as necessary and appropriate.

Policy

The Nebraska Department of Labor, Office of Legal Counsel, monitors program and fiscal performance at the state and local area levels to ensure proper systems are not only in place, but that they are being followed and meet the requirements of the law on a yearly basis. A procedural guide for statewide monitoring activities is available for review on the Internet at www.dol.nebraska.gov. [Go into information - Workforce Investment Act - WIA Monitor Manual.] When a sub-recipient is in need of technical assistance, the Nebraska Department of Labor, Office of Employment & Training assesses the situation and provides the appropriate services.

"Sub-recipients" are the entities which are awarded sub-grants. They are accountable to the recipient (or higher tier sub-recipient) for the use of the funds provided. They must conduct regular oversight and monitoring of their sub-recipients and contractors in order to:

- Determine expenditures have been made against the cost categories and within the cost limitations specified in the Act and regulations;
- Determine whether or not there is compliance with other provisions of the Act and regulations; and
- Provide technical assistance as necessary and appropriate.

"The chief elected official in a local area shall serve as the local grant recipient for, and shall be liable for any misuse of, the grant funds allocated to the local area...unless the chief elected official reaches an agreement with the Governor for the Governor to act as the local grant recipient and bear such liability." [Sec. 117 WIOA]

The State monitoring system must:

- Provide for annual on-site monitoring reviews of each local area to ensure compliance with 2 CFR part 200, as required by WIOA Section 184(a)(3).

- Ensure that established policies, to achieve program quality and outcomes, meet the objectives of the Act and regulations.;

- Enable the Governor to determine if sub-recipients and contractors have demonstrated substantial compliance with WIOA and Wagner-Peyser requirements;

- Enable the Governor to determine whether a local plan will be disapproved for failure to make acceptable progress in addressing deficiencies as required in WIOA Section 108(e)(1); and

- Enable the Governor to ensure compliance with the nondiscrimination, disability, and equal opportunity requirements of WIOA section 188, including the Assistive Technology Act of 1998 (29 U.S.C. 3003)..

Steps in State Monitoring Process

1. Notification: With the exception of unscheduled reviews, notification of pending monitor reviews will be given ten (10) or more working days before each review. The Nebraska Department of Labor is authorized to monitor any entity receiving WIOA funds, and these reviews may include entering sites or premises to examine program and fiscal records, question employees, and interview participants. It reserves the option to conduct unannounced or unscheduled reviews as appropriate.

2. Sampling: Random-sampling and data validation techniques will be used to draw the samples that will be used to review records. The review may include all (100%) of the record universe if the universe is small or problems are identified during the review.

3. Interviews: Review interviews will be offered and/or provided upon request to appropriate officials for each review conducted.

4. Working Papers: Review working papers shall be established during the review and maintained at the Nebraska Department of Labor, Office of General Counsel.

5. Report: A monitor report will be issued within 30 days of the completion of the review and it shall be published in the following format: background; Limitations (if applicable); Results of the Review; Corrective Action if Required; and Summary. Copies of the report will be dispensed to the following: Local Workforce Development Area Administrative Entity; Local Workforce Development Area Board Chair; Commissioner of Labor/WIOA Liaison; Director of the Office of Employment and Training; General Counsel, Monitor File, and CEO Representative, upon request.

6. Resolution or Completion: The review is completed or resolved if corrective action is not required.

7. Corrective Action: The entity will issue a corrective action plan to the Nebraska Department of Labor, Office of Legal Counsel, 550 South 16th Street, Lincoln, Nebraska 68509, within thirty (30) days of the receipt of a report which requires corrective action. The corrective action plan shall identify the action the entity will initiate to correct the problem, the estimated date the problem will be resolved, and how the local board shall be involved in addressing this issue. In the event it is not possible to resolve findings through the monitoring system, a referral may be made to the Executive Director, Office of Employment and Training for Technical Assistance or referred to the Commissioner of Labor for resolution and/or action.

8. Acceptance of the Corrective Action Plan: The Nebraska Department of Labor shall notify the entity of the resolution of the corrective action plan.

9. Progress Reports: The Nebraska Department of Labor may choose to require progress reports from the entity for some corrective action plans. The acceptance notification will indicate if and when progress reports are required.

10. Further Action: At the discretion of the Nebraska Department of Labor, additional monitor reviews may be conducted to ensure full implementation of the corrective action plan.

11. Fiscal Controls/Sanctions: In the event of a sub-recipient's failure to take required corrective action for substantial violation of standards, sanctions and fiscal controls will be imposed according to WIOA Sections 184(b) and (c). These actions may be appealed to the Secretary of Labor in accordance with Section 184(b)(2).

Certification will be provided to the Secretary of Labor every two years:

- The State has implemented uniform administrative requirements;
- The State has monitored local areas to ensure compliance with uniform administrative requirements; and
- The State has taken appropriate corrective action to secure such compliance [WIOA Sec. 184(a)(6)].

Local Monitoring and Oversight Responsibilities: The local board, in partnership with the Chief Elected Official, must:

1. conduct oversight with respect to local programs of youth activities, local employment and training activities for adults and dislocated workers, and the one-stop delivery system in the local area;

2. Ensure the appropriate use and management of the funds provided for the activities; and

3. For workforce development activities, ensure the appropriate use, management, and investment of funds to maximize performance outcomes under WIOA section 116.

Each local area shall prepare and submit to the Nebraska Department of Labor, Office of Employment & Training, a schedule and policy addressing how they will conduct monitoring of their sub-recipients pursuant to 2 CFR part 200.331 and how they will engage their local board in monitoring and oversight activities.

PROCEDURE FOR DATA VALIDATION

Purpose

Performance audits conducted by the U.S. Department of Labor's Office of Inspector General found the accuracy of reported performance outcomes could not be assured due to insufficient local, state, and federal oversight. To address these concerns, and to ensure the accuracy of data collected and reported on the workforce development system, the Employment and Training Administration (ETA) expanded its efforts to conduct data validation

Policy

The data validation initiative covers both the accuracy of aggregate reports submitted to ETA on program activity and performance outcomes and the accuracy of individual data elements. For each program year, Nebraska must submit a validated annual report by October 1st each year, and the appropriate WIA/WIOA Standardized Record Data (WIASRD) records by October 15th each year. Report validation must be completed prior to submitting the annual report, and data element validation using a file of exiters and participants reported in the annual report must be submitted by February 1st of the following year. Data element validation results are due 120 days after the submission of the annual report.

Report Validation

This process evaluates the validity of aggregate reports submitted to ETA by checking the accuracy of the reporting software used to calculate the reports. Report validation is accomplished by processing an entire file of participant records into validation counts and comparing the validation counts to those reported by the state or grantee.

ETA has developed standardized software that states and grantees can use to validate the accuracy of aggregate reports generated by state or grantee software. The latest standardized software, user guides and validation handbooks for each program are posted on ETA's web site at http://www.doleta.gov/performance/. Click on the link for Performance Reporting and Data Validation and go to the bullet point, Data Validation. The ETA software will produce an error rate for each reported count. The standardized software can also be used to generate aggregate information to be submitted to ETA prior to submitting the annual report.

Data Element Validation Process

This process assesses the accuracy of participant data records. Data element validation is performed by reviewing samples of participant records against source documentation to ensure compliance with federal definitions.

Not all data elements are subject to validation. Data elements are selected for validation based on three factors:

- Feasibility – ETA can validate data elements only when it is practical and efficient to locate and examine supporting evidence within the state records. Therefore, such items as race, ethnicity, and gender will not be validated because these data elements are self-reported by participants, and it is not efficient to locate the participant to document these characteristics. It is also not practical to validate for data entry errors.
- Risk – The process for validating data elements is based partly on the likelihood that the data element may be inaccurate. Data elements involving human judgment are more prone to error than data elements that do not involve human judgment. For example, determination of employment

based on supplemental sources is more likely to be in error than determination of employment from wage records.

- Importance – Data elements are selected for validation based primarily on their importance to the integrity of the ETA 9091 report (Annual Report).

The ETA standardized software generates a sample of the participant records and data elements the state or grantee will validate. Data element validation samples are selected from a sample of offices within the state, rather than from every office.

Two sampling techniques are used:
1. Clustering – The software selects the sample of exiters from a relatively small number of locations within the state where source documentation is stored. This approach reduces the burden that on-site validation imposes on the state by limiting the number of locations to visit.

2. Stratification – Cases that have a higher potential for error that will affect performance (positive employment or education outcomes) and more data elements to be validated are sampled in greater proportion than cases with a reduced chance of error (negative employment or education outcomes) and fewer elements to validate.

Once the state has validated the sampled records, the software weights the results of the validation to correct for over- and under-sampling resulting from the clustering and stratification.

The data element validation tasks include:
1. Assemble worksheets and arrange visits to Career Center offices.
State staff needs to conduct the validation on site except for data stored at the state level and through ECM, i.e., wage record information, scanned documents. States have the flexibility to determine the most efficient source to use to validate the information when more than one source is specified. State staff shall notify local staff well in advance of when the onsite validation will occur to ensure that local staff is available to assist in the validation. State staff shall also inform local staff which records have been sampled, no more than one to two days in advance of the onsite review. This will make the review more efficient, while minimizing the possibility for changes to the case files.

2. Assemble supporting documentation and complete worksheets.

3. Examine summary and analytical reports.

The software calculates the error rate for each element and produces separate summary and analytical reports for each group.

Accuracy Standards

According to TEGL 9-07, ETA considers that a WIOA state grantee fails to report year-end results when the grantee fails to submit an accurate WOIA annual report as determined by applying a two percent error threshold to program outcomes, including numerators and denominators, summarized in the Report Validation Summary.

States and grantees will be held accountable for meeting acceptable levels and will be required to address any issues concerning data accuracy. States and grantees that fail to meet accuracy standards will receive technical assistance from ETA and will develop and implement a corrective action plan. Data that do not meet accuracy standards will not be acceptable for measuring

performance, and may keep the state or grantee from being eligible for incentives that are awarded based on performance data.

Data Source Documentation

The elements required for data element validation focus on eligibility, performance, and services. Attached is a list providing federal guidance regarding what types of source documentation are acceptable to validate key data elements related to WIA program eligibility, services and outcomes. Only one of the documents listed for each element is required for validation. However, it is necessary to validate using a source appropriate for the type of services received. Individuals who received staff-assisted services only sometimes have different sources listed than those who received intensive and/or training services. For DRVS fields 156-198, refer to and use the revised guidance in TEGL 17-05, Change 1 when validating PY07 data.

Special attention must be paid to the following general definitions for certain types of source documentation:

- Cross-Match: A cross-match requires validators to find detailed supporting evidence for the data element. An indicator or presence of an SSN in a non-WIOA database is not sufficient evidence. For example, TANF participation can be determined by a cross-match with Nebraska's public assistance database. It is not sufficient to find that the sampled SSN is present in the public assistance database; validators must also find dates of participation and services rendered.

- State MIS: Unless otherwise noted, state MIS refers to specific, detailed information, such as dates and types of services and explanations of barriers to employment that is stored in the state's information system that provides supporting evidence for the data element. An indicator, such as a checkmark on a computer screen, alone is not acceptable source documentation. For example, state MIS is acceptable source documentation for date of first training service. To be an acceptable source to validate date of first training service, in addition to the date of first training, the state MIS should have detailed information about the type of training and the organization that provided the training. This detailed information makes valid source documentation and makes it unnecessary for such states to validate this data element in local offices.

- Self-attestation: Self-attestation occurs when a participant states his or her status for a particular data element, such as pregnant or parenting youth, and then signs and dates a form acknowledging this status. The key elements for self-attestation are: (a) the participant identifying his or her status for permitted elements and (b) signing and dating a form attesting to this self-identification. The form and signature can be electronic or on paper.

- Case Notes: Case notes refer to either paper or online statements by the Case manager that identify a participant's status for a specific data element, the date on which the information was obtained, and the Case Manager's signature or system entered name.

The WIA Validation Handbook provides the validation rules that apply to each data element, i.e., match or support. To match, the data on the worksheet must be the same as the data in the source documentation. For example, if the worksheet says a participant's date of birth is July 1, 1975, then the source documentation must also have July 1, 1975 as the birth date. To support, the data on the worksheet must provide evidence that the data on the worksheet is correct. This instruction is used when information must be interpreted or processed before it can be used to assess the accuracy of the data on the participant's records. For example, source documentation is used to support youth who needs additional assistance because validators must interpret policy and determine if the documentation supports that policy. (This will apply to WIOA participants.)

Record Retention

The record retention requirement that will apply to records of all validation activities, including files, worksheets, reports, and source documentation, is three years. The State shall be responsible for keeping completed worksheets, summary reports and analytical reports. Local offices/Workforce Investment Boards shall retain the validated files and original supporting documentation for monitoring purposes.

GENERAL INFORMATION ON DATA ENTRY, DOCUMENTATION

In NEworks, the field(s) for Selective Service, Dislocation Date and Pell Grants should be modified as their statuses change during a client's participation in WIOA.

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 9

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

Equal Opportunity, Complaints & Grievances

GENERAL INFORMATION ON EQUAL OPPORTUNITY AND NON-DISCRIMINATION

The service provider must ensure nondiscrimination, equal opportunity, and nonparticipation in sectarian activities while delivering services under the Workforce Innovation and Opportunity Act (WIOA).

The Act prohibits discrimination on the basis of race, color, national origin, sex, age, disability, religion, political affiliation or belief, participant status, and certain non-citizens.

The service provider must provide initial and continuing notice it does not discriminate on any prohibited grounds. The notice must be provided to: registrants, applications, employees, union or professional organizations that hold collective bargaining agreements with the grant recipient or service provider, members of the public including those with impaired vision or hearing, and any subcontractor who receives WIOA funds from the service provider or grant recipient.

The notice must be provided in an appropriate format to individuals with visual impairments and the service provider must be able to provide reasonable accommodations to all other individuals with disabilities so they may enjoy the benefits of the program.

The notice may be provided by posting "Equal Opportunity is The Law" posters, personnel orientation, tag lines on stationary, pamphlets, handbooks, manuals, etc.

Each individual who is registered for the WIOA Program will be requested to acknowledge they are aware of the service provider's position on Equal Opportunity and they may file a complaint if they believe they have been discriminated against.

GENERAL INFORMATION ON COMPLAINTS AND GRIEVANCES

There are two different processes for submission of complaints for subsequent resolution. One process is to ensure the complainants are able to submit a complaint on violations of the Equal Opportunity laws and complaints on discrimination. The other process provides individuals an opportunity to submit a non-criminal type complaint regarding violations of the Workforce Innovation & Opportunity Act or other federal and state laws or rules, including grant agreements, grant awards, collective bargaining agreements, failure to receive services, etc.

Equal Opportunity Complaints: Any person who believes that she or he or any specific class of individuals has been, or is being subjected to discrimination on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship may file a complaint under this process. The complainant may file a complaint with either:

Kimberly Taylor-Riley
Director Of Equity & Diveristy
555 S 10th St. Ste 304
Lincoln, NE 68508

Director of Civil Rights Center
U.S. Department of Labor
200 Constitution Avenue, NW
Room N-4123
Washington, D.C. 20210

The complaint must be submitted in writing following the instructions provided. Additionally, the submittal and resolution of the complaint must adhere to the timelines specified in the policy.

U.S. Department of Labor Complaint forms can be found at:

English: http://www.dol.gov/oasam/regs/compliance/CIF(English).pdf

Spanish: http://www.dol.gov/oasam/regs/compliance/CIF(Spanish).pdf

As part of the WIOA Grievance Review it must be verified that the local entity is aware of the responsibility to report certain complaints to U.S.DOL. Information and complaints involving criminal fraud, waste, abuse or other criminal activity must be reported immediately through the Department's Incident Reporting System to:

DOL Office of Inspector General
Office of Investigations
Room S5514
200 Constitution Avenue NW.
Washington, DC 20210

Information and complaints may also be reported to the corresponding Regional Inspector General for Investigations, with a copy simultaneously provided to the Employment and Training Administration. The Hotline number is –800–347–3756. The Web site is http://www.oig.dol.gov/contact.htm.

Complaints and grievances of a non-discriminatory or non-criminal nature: Under this process, WIOA staff, program applicants, participants, recipient of grant awards, contracts, labor unions, service providers, etc., may file complaints alleging violations of the Act, or other federal and state rules. This process may also be used to cover most non-criminal issues not covered by Equal Opportunity complaint process. Again, complaints under this process must be in writing and must adhere to the timelines specified by the Greater Lincoln policy. Complaints for the process must be submitted to:

Kimberly Taylor-Riley
Director Of Equity & Diveristy
555 S 10th St. Ste 304
Lincoln, NE 68508

One Stop Employment Solutions
OSES Program Manager
1111 O St., Suite 205
Lincoln, NE 68508

The WIOA representative must ensure all enrollees are aware of these policies and that they have the right to file a complaint if the need exists. These policies must be posted on the bulletin board of the American Job Center to ensure an opportunity for public review.

See WIOA Complaint Form in Section 11 – Attachment AD.1

PROCEDURE FOR REQUEST FOR REASONABLE ACCOMMODATION

Purpose

To define the process on how clients can request accommodations in order to participate in the program or received services from the American Job Center.

Policy

The procedure for requesting reasonable accommodation is posted in the American Job Center/Resource Room and Employee Room. It is also included in the OSES Operation Manuals.

Records must be collected and maintained on individuals/registrants, applicants, participants and employees who ask for accommodation.

Individuals/registrants, applicants, participants and employees who request accommodation must fill out a One Stop Employment Solutions Accommodation Request Form (See Section 11 – Attachment AE).

The Accommodation Request Form must be completed in full and signed by the individual. The OSES Program Manager will determine if the accommodation request is reasonable and able to be provided. If the request is approved the OSES Program Manager signs the form returns it to the OSES staff person who is working with the individual. The OSES staff person will indicate if accommodation has been provided and what accommodation was provided.

If the OSES Program Manager determines the request is not reasonable or is not able to be provided, they will document this on the form and return it to the OSES staff person who is working with the individual. The individual has the right to appeal a denial and they will be referred to the Equal Opportunity and Nondiscrimination Policy.

After determination of the request has been made, the OSES staff signs and dates the form it will be filed either with the Program Manager or if the individual is an applicant or participant who has a NEworks record it will be filed in their ECM record.

PROCEDURE FOR ACCESSIBILITY

Purpose

This policy is directed toward ensuring the programs, services and facilities of each One-Stop delivery system are accessible to all, including individuals with disabilities.

Policy

No individual is to be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with, any such program or activity because of race, color, religion, sex (except as otherwise permitted under Title IX of the Education Amendments of 1972), national origin, age, disability, or political affiliation or belief.

Prohibition of Discrimination on the Basis of Disability: A recipient is obligated to provide physical and programmatic accessibility and reasonable accommodation/modification in regard to the WIA program, as required by section 504 of the Rehabilitation Act of 1973, as amended, and the Americans with Disabilities Act of 1990, as amended, and Section 188 of WIA.

The ADA defines a "disability" with respect to an individual to mean a physical or mental impairment that substantially limits one or more of the major life activities of such individual, a record of such an impairment, or being regarded as having such an impairment.

Auxiliary Aids, Services and Assistive Technology: To afford individuals with disabilities an equal opportunity to participate in and enjoy the benefits of the WIOA Title I program or activity, a recipient must furnish appropriate auxiliary aids or services where necessary.

In determining what type of auxiliary aid or service is appropriate and necessary, such recipient must give primary consideration to the requests of the individual with a disability. Primary consideration means honoring the choice unless the agency can demonstrate another equally effective means of communication is available, or that using the means chosen would result in a fundamental alteration in the service, program, or activity, or undue financial and administrative burdens.

In Nebraska, a Memorandum of Understanding was signed creating a partnership between the Assistive Technology Partnership, the Commission for the Blind and Visually Impaired, Vocational Rehabilitation, and Workforce Development. This partnership was formed to support the purchase of, and integration of, assistive technology solutions into the One Stop Resource Centers. Through local written agreements, specific commitments and equipment to be received were identified.

Physical and Architectural Accessibility: In order to be ready and welcoming when persons with disabilities seek services, advance preparatory actions must be taken. Specific information on ADA accessibility guidelines for buildings and facilities is provided on the Internet at www.access-board.gov/adaag/html/adaag.htm. Some areas to particularly note include:

- Signage
- Accessible Counters
- Automatic and Power-Assisted Doors

- Accessible Restrooms
- Accessible Workstations
- Obstacle Free Entrance
- Space in Waiting Room for People Using Wheelchairs
- 32-inch Clear Opening on Door
- 36-inch Clear Path of Travel

The above is only a sampling of considerations. Accessibility is an on-going process. However, all of the ADA technical requirements must be applied during the design, construction, and alteration of buildings and facilities.

Reasonable Accommodations: With regard to aid, benefits, services, training, and employment, a recipient must provide reasonable accommodation to qualified individuals with disabilities who are applicants, registrants, eligible applicants/registrants, participants, employees, or applicants for employment, unless providing the accommodation would cause undue hardship. Definitions of the terms "reasonable accommodation" and "undue hardship" are specified in 29 CFR 37.4.

Recommended Steps for Accessibility

- Designate an Access Coordinator (someone well versed in ADA requirements).
- Consult with disability community and with people who are trained in access and ADA compliance.
- Include a cross section of customers and board members with disabilities in visits to your Career Centers. Ask them to make suggestions for improvements.
- Use Self-Evaluation Checklists. Complete checklists for physical, program, employment and communication access including:
    - Customer Service/Accommodation Practices
    - Existing Facilities Self Evaluation
    - Software Accessibility
    - Web page Accessibility
    - Information Transaction Machines (ITMS) Accessibility
    - Information Technology Equipment.

    The above checklists are located on the Internet at http://wdsc.doleta.gov/disability/pdf_docs/tein_16_99.pdf.

    These checklists enable each local workforce investment area to conduct self evaluations of the accessibility of its One-Stop delivery system and to plan to meet the accessibility needs of individuals with disabilities seeking to use programs, services, and facilities. The checklists are essentially a management tool to assess what has already been done to provide access for individuals with disabilities and to plan what needs to be done in the future. The self-evaluation captures both the strengths and weaknesses, and allows local

workforce investment areas to develop concrete plans, based on real data, to increase the level of accessibility in their programs, services and facilities.

Develop an Access Plan

The plan shall be based on your findings and include:

- The barriers and solutions.
- Establish a priority for each item.
- Project the costs associated with each item.
- Identify funding sources.
- Target completion.
- Identify who will do what.

Provide Training to One-Stop Career Center Staff and Contractors

Effective training ensures that employees and contractors are knowledgeable and aware of policies and procedures relating to persons with disabilities, and are trained to comfortably work with all people. It is critical there is not a gap between written policies/procedures and the actual practice of front-line employees interacting with persons with disabilities.

There are several training and reference tools available on the Internet including:

- "Access for All: A Resource Manual for Meeting the Needs of One-Stop Customers with Disabilities" - Institute for Community Inclusion (Children's Hospital Boston and the University of Massachusetts Boston) - the web site location is www.workforceatm.org/sections/pdf/2001/ici.pdf.
- "At Your Service - Welcoming Customers with Disabilities" - Southeast Disability and Business Technical Assistance Center - the web site location is www.sedbtac.org/distanceEd/web/AtService/index.cfm.

Conduct Regular Oversight and Monitoring

Conduct regular oversight of programs and services to ensure individuals are not subjected to discrimination on the basis of disability.

PROCEDURE FOR (LEP) LIMITED ENGLISH PROFICIENCY TITLE VI PROHIBITION AGAINST NATIONAL ORIGIN DISCRIMINATION

Purpose

To establish a procedure to ensure the programs, services and facilities of each One-Stop delivery system are accessible to all, including individuals with limited English proficiency.

Policy

Each recipient of federal financial assistance described above must take reasonable steps to ensure LEP persons receive, free of charge, the language assistance necessary to afford them meaningful access to their programs, services, and information.

Limited English Proficient Individual Definition

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient, or ``LEP,'' and entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Four-Factor Analysis for Assessing Reasonable Steps

1. **The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population**
   One factor in determining what language services recipients should provide is the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population. The greater the number or proportion of these LEP persons, the more likely language services are needed. Recipients should begin by examining prior experiences to determine the breadth and scope of language services that have been needed. They should also consider language minority populations, who may be eligible for programs, may have been underserved because of existing language barriers. When assessing eligible service populations of local areas, each Career Center may wish to assess its own local service population. The existence of different LEP populations at different Career Centers may justify differing levels of LEP services at the Career Centers.

2. **The Frequency with Which LEP Individuals Come in Contact With the Program**
   Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from potential language groups seeking assistance at the various Career Centers. The more frequent the contact with a particular language group, the more likely the enhanced language services in that language are needed. When recipients serve LEP persons on an unpredictable or infrequent basis, it is still advisable to analyze what to do if a LEP individual seeks services.

3. **The Nature and Importance of the Program, Activity, or Service Provided by the Recipient**
   The importance of the activity, information, service, or program, or the greater the possible consequences of the contact to LEP individuals should be considered.

4. **The Resources Available to the Recipient and Costs**
   A recipient's level of resources and the costs that would be imposed, may have an impact on

the nature of the steps to be taken in providing language services. Costs associated with providing meaningful access to LEP persons are considered allowable program costs. Smaller recipients with more limited budgets are not expected to provide the same level of language services as are larger recipients with larger budgets.

Language Service Considerations

Quality and accuracy of the language service is critical. In addition, language assistance should be provided in a timely manner.

Oral Language Services

When using interpreters, recipients should determine if the interpreter demonstrates proficiency and ability to communicate information accurately in both English and in the other language.

Individuals with limited English proficiency have the option of using, at their own expense, interpreters of their own choosing (whether a professional interpreter, family member, friend, or other informal interpreter) in place of, or as a supplement to, the free language services expressly offered by the recipient.

Recipients may use telephone interpreter lines. Telephone interpreter service lines often offer speedy interpreting assistance in many different languages.

Written Language Services

Translation is the replacement of a written text from one language (source language) into an equivalent written text in another language (target language).

A recipient may determine an effective LEP plan for its particular program or activity includes the translation of vital written materials into the language of a frequently-encountered LEP group eligible to be served and/or likely to be affected by the recipient's program. Deciding on whether or not a document (or the information it provides and/or solicits) is ``vital'' may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

Recipients who operate web-based, self-service systems as an adjunct to their in-person delivery systems might consider using language software conversion packages or provide information in appropriate languages on how to obtain free language assistance.

The extent of a recipient's obligation to provide written translations of documents should be determined by the recipient on a case-by-case basis after assessing the four factors. The length of a document's lifespan and the volume of new documents requiring translation may also be a factor in this determination.

Effective Language Assistance Plan (LAP) Development

After the assessment process is complete and after determining what language assistance services are appropriate, a recipient should develop an implementation plan to address the identified needs of the LEP populations they serve. Recipients have considerable flexibility in developing this plan.

A written plan, while not a requirement, can be an important tool for a recipient. The development

and maintenance of a periodically-updated written plan on language assistance for LEP persons for use by recipient staff serving the public can be an appropriate and cost-effective means of documenting compliance, and providing a framework for the provision of timely and reasonable language assistance. Moreover, such written plans often provide additional benefits to a recipient's managers in the areas of training, administration, planning, and budgeting. A written LEP plan should document the language assistance services available and how staff and LEP persons can access those services.

If a recipient chooses to not develop a written LEP plan, it should be able to articulate in some other reasonable manner a plan for providing meaningful access.

Five Elements to Address in the LEP Plan

1. **Identifying LEP Individuals Who Need Language Assistance**
   The plan identifies the estimated number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters.

2. **Language Assistance Measures**
   An effective LEP plan contains information about the ways in which language assistance will be provided including these items:

   - types of language services available;
   - how staff can obtain those services;
   - how to respond to LEP callers;
   - how to respond to written communications from LEP persons;
   - how to respond to LEP individuals who have in-person contact with staff;
   - how to ensure competency of interpreters and/or translation services; and
   - other information as the recipient deems necessary.

3. **Training Staff**
   It is important staff are aware of their obligations to provide meaningful access to information and services for LEP persons. Staff should be trained to know about LEP policies and procedures and staff having contact with the public should be able to work effectively with in-person and telephone interpreters.

4. **Providing Notice to LEP Persons**
   Notices announcing the availability of language assistance services need to be provided in language(s) LEP persons will understand. Some places where this notification may be helpful include: signage within the Career Center; statements in outreach documents; presentations and targeted communication efforts with community-based organizations and other stakeholders; telephone voice mail menus; local newspapers; and non-English language radio and television stations.

5. **Monitoring and Updating the LEP Plan**
   A process should be in place for determining, on an ongoing basis, whether new documents,

programs, services, and activities need to be made accessible for LEP individuals. Recipients should consider whether changes in demographics, types of services, or other factors require reevaluation of LEP plans.

Technical Assistance

Self-Assessment Tool: A "Language Assistance Self-Assessment and Planning Tool for Recipients of Federal Financial Assistance" is available at the LEP website at http://www.lep.gov/selfassesstool.htm.

Technical Assistance Guide: The U.S. Department of Labor's Employment and Training Administration anticipates issuing a Technical Assistance Guide (TAG) on Services to Limited English Proficient Persons before the end of the calendar year. The TAG is expected to bring together in one document, the experiences and promising practices of many grantees. They expect to include documents and translations related to LEP service delivery including many accessible in an electronic format.

Compliance Assistance Resources: The U.S. Department of Labor's Civil Rights Center has a web site at: http://www.dol.gov/oasam/programs/crc/crcwelcome.htm. EO Posters other than English; and "I Speak" Language Identification Flashcard can be accessed at this web site.

Use Google Translate: Use google Translate to assist clients with needed translation.

Enforcement

The requirement to provide meaningful access to LEP persons is enforced and implemented by the U.S. Department of Labor through the procedures identified in the Title VI and Section 188 regulations. The Nebraska WIOA Equal Opportunity and Nondiscrimination policy provides information on the definition of recipients, the role of the Equal Opportunity Officer, procedures for filing complaints, and instructions related to data/information collection and maintenance. The procedures discussed in the Equal Opportunity and Nondiscrimination policy are all applicable to this policy.

The U.S. Department of Labor (DOL) has acknowledged the implementation of a comprehensive system to serve LEP individuals is an evolving process that will improve over time, as it is developed, implemented and periodically reevaluated. As recipients take reasonable steps to provide access to federally assisted programs and activities for LEP persons, DOL has agreed to look favorably on intermediate steps recipients take that are consistent with the May 29, 2003 federal register, and that, as part of a broader implementation plan or schedule, move their service delivery systems toward providing full access to LEP persons. At the same time, DOL is reminding recipients this does not excuse noncompliance, but rather recognizes full compliance in all areas of a recipient's activities and for all potential language minority groups may reasonably require a series of implementing actions over a period of time.

In developing any phased implementation schedule, recipients should ensure:

- The provision of appropriate assistance for significant LEP populations or with respect to activities having a significant impact on the health, safety, legal rights, or livelihood of beneficiaries is addressed first; and

- Documentation of their efforts to provide LEP persons with meaningful access to federally assisted programs and activities is kept on file.

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 10

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

Definitions

Definitions of Program Terms: The list of definitions provides a description of many of the terms used during the delivery of programs under the WIOA. While the list is not all-inclusive, it does provide a quick reference for program requirements established by federal, state, and local rule.

The service provider and service provider staff should become familiar with the terms and may recommend additional definitions or changes to current definitions as long as the changes remain consistent with the federal rule.

Term	Definition
Ability to Successfully Participate in Training	An individual who has met all eligibility requirements after an individualized interview, evaluation or assessment and has been determined to be in need of training and has the necessary skills, qualifications, and provision of other resources (such as child care, transportation, etc.) to successfully complete a selected training program.
Academic Credit	Credit for education, training, or work experience applicable toward a secondary school diploma, a post-secondary degree, or an accredited certificate of completion consistent with applicable State law and regulation and the requirements of an accredited educational agency or institution.
Administrative Entity	The entity designated to provide administrative support to the Workforce Development Board and the Chief Elected Official. Includes the implementation and administration of the responsibilities described by the Greater Lincoln Workforce Development Area's Local Plan.
Application	The process a service provider conducts to collect information in order to determine an individual's eligibility for program services. Application methods may include electronic data transfer, personal interview, or an individual's application. The activity shall be conducted on all individuals seeking workforce investment services, other than self-service or informational activities, and will include the collection of EEO data.
Aptitude	Natural or acquired talent or ability; quickness in learning and understanding.
Barriers to Employment	Examples of barriers to employment include: ▪ Basic Skills Deficient ▪ School Dropout ▪ Offender ▪ Individual with a Disability ▪ Homeless ▪ Veteran ▪ Foster Child ▪ Substance Abuse ▪ Cash Welfare Recipient ▪ Pregnant or Parenting ▪ Requires English as a Second Language (to function on the job) ▪ Unable to Obtain or Maintain Employment (during the last

Term	Definition
	twelve (12) months.)
Basic Skills Deficient	An individual who computes or solves problems, reads, writes or speaks English at or below the 8.9 grade level as determined by a norm or criterion referenced assessment tool, or an individual who is unable to compute or solve problems, read, write or speak English at a level that is necessary to function on the job, in the individual's family or in society.
Basic Skills Goal	A measurable increase in basic education skills including reading comprehension, math computation, writing, speaking, listening, problem solving, reasoning, and the capacity to use these skills.
CASAS (The ECS Appraisal)	The ECS Appraisal is used to make an initial assessment of a learner's reading and math skill level. The appraisal score will place the learner into an appropriate program and pretest level. The ECS Appraisal is used in conjunction primarily with the ECS and Life and Work series of progress tests
Case Management	A client-centered approach in the delivery of services designed to prepare and coordinate comprehensive individual employment plans and individual service strategies, including such services for participants to ensure access to all necessary WIOA activities and support services, using, where feasible, computer-based technologies.
Chief Elected Official	The Chief Elected Official of a unit of general local government in a local area, or where the local area includes more than one unit of general local government; the individual designated under the Chief Elected Officials agreement(s).
Citizenship Skills	Individual skills, which include the ability to solve problems, promote teamwork, communicate effectively, develop self-esteem, individual initiative and leadership skills, and to commit to lifelong learning and an ethic of civic responsibility. These are some of the traits of a productive worker and good citizen.
Client/Participant	An individual who is seeking services or participating in WIOA activities provided by the One Stop Delivery system. The term "participant' means an individual who has been determined eligible to participate in and who is receiving services under a program authorized by Title I of the Workforce Innovation and Opportunity Act. Program participation shall be deemed to commence on the first day, following a determination of eligibility, on which the individual began receiving subsidized employment, training or other services provided by the Act.
Community Based Organization	A private non-profit organization that is representative of a community or a significant segment of a community, and has demonstrated expertise and effectiveness in the field of Workforce Development.
Consumer Choice	One Stop delivery systems shall have available a list of eligible training providers to maximize an individual's choice in selecting such provider. The list shall contain information on training programs offered, prior performance results, and cost information. The system shall also provide information on providers of on-the-job training and

Term	Definition
	customized training. Individual consumer choice to select a training provider shall be made in consultation with a Case Manager.
Consumer Reports System	An information system designed to assist clients/participants in selecting an educational or training institution in order to make educational or career choices toward achieving economic security and financial independence.
Credential	Any nationally recognized degree or certificate or State or locally recognized credential. Credentials include, but are not limited to: high school diploma, GED or other recognized equivalents, post-secondary degrees or certificates, recognized skill standards, licensure or industry recognized certificates, and all state education recognized credentials or certificates verifying successful completion of any training service or program which is designed to help individuals prepare for employment, enter or re-enter employment, retain employment, or advance to better employment. The credentials defined above apply to adults, dislocated workers, displaced homemakers and youth.
Customized Training	Training that is designed to meet special requirements of an employer or group of employers and is conducted with a commitment by the employer(s) to employ the trainee upon successful completion of the training. In addition, the employer(s) must pay for not less than fifty percent of the training costs.
Displaced Homemaker	An individual who has provided unpaid services to family members in the home and has been dependent on the income of another family member but is no longer supported by that income, is unemployed or underemployed, and is experiencing difficulty in obtaining or upgrading employment.
Dropout	An individual who is no longer attending any secondary school and who has not received a secondary school diploma or its recognized equivalent. An individual attending an alternative school is not considered to be a dropout.
EEO Data	Data that identifies race, ethnicity, age, sex, and disability, if applicable.
Eligible Training Provider	An entity that has met the eligibility requirements under the WIOA and has been approved by the State Workforce Board to deliver training services. The statewide list of approved training providers is being developed by the Nebraska Department of Labor.
Eligible In-School Youth	An individual who is not less than age 14 or not more than age 21. For additional clarification, see the policy on in-school youth eligibility.
Eligible Out-of-School Youth	An individual who is age 18-24. For additional clarification, see the policy on out-of-school youth eligibility.
Employment and Training Activity	Any activity described in Section 134 of the Act and includes the establishment of a local One Stop Center, delivery of career services, training services, and support services, providing participants with individual training accounts, etc.
Exiter	A participant who has a date of case closure, program completion or known exit from workforce development funded activities or non-

Term	Definition
	workforce development partner activities, or a participant who does not receive any workforce funded or non-workforce development funded partner services for a period of ninety (90) days, and is not scheduled for future services except for follow-up services. Participants who have a planned gap in service of greater than ninety (90) days shall not be considered an Exiter if the gap is due to a delay in beginning training, or health/medical conditions which prevent the individual from participating in services.
Family	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: ▪ Spouses and dependent children, ▪ A parent or guardian and dependent children, or ▪ Spouses.
Follow-up Services for Youth	Services that may be provided to youth for up to twelve (12) months after a participant has exited the program. Follow up services that may be provided (but not limited to) include the following: ▪ Leadership development ▪ Support services ▪ Regular contact with participant's employer to address work related problems. ▪ Work related peer groups ▪ Assistance in securing a better paying job, career development, and further education. ▪ Tracking participant's progress in employment after training. All youth participants must receive some form of follow-up services for a minimum duration of twelve (12) months.
Fund Transfer	The local Workforce Development Board may transfer up to one hundred percent (100%) of a program year allocation for the adult program and up to one hundred percent (100%) of the dislocated worker program between the two programs. Youth funds may not be transferred to another program area.
Greater Lincoln Workforce Development Area	The two (2) county-area served by the Greater Lincoln Workforce Development program. The area covers Lancaster and Saunders counties.
High School Diploma Equivalent	A General Equivalency Diploma (GED) or high school equivalency diploma recognized by the state.
In-School	Classification for a youth program client enrolled in a public or private school. In-school youth are those who do not meet the definition of WIOA out-of-school youth.
Individual in Need of Training	An individual who has minimal or no work history, is deficient in basic skills, has limited English speaking ability, is unable to obtain or maintain employment during the past twelve (12) months, or whose individual assessment indicates training is needed to gain self-sufficient employment.
Individual Employment Plan (IEP)	A service strategy for adults and dislocated workers that is developed in partnership between the Case Manager and the participant. The plan shall identify the employment goal(s), the steps that will be taken

Term	Definition
	to reach the goal(s) and objectives including an outline of the activities and/or services that will be provided. The plan is developed utilizing the results of the objective assessment, and the expressed interest and desires of the participant.
Individual with a Disability	An individual with any disability as defined in Section 3 of the Americans with Disabilities Act of 1990.
Individual Service Strategy (ISS)	A service strategy for youth that is developed in partnership between the Case Manager and the youth participant. The plan shall identify the employment goal, appropriate achievement objectives, and appropriate services for the youth taking into account the Objective Assessment.
Individual Training Account (ITA)	An account established on behalf of an Adult or Dislocated Worker participant which will be used to purchase authorized adult and dislocated worker training services from eligible training providers.
Initial Assessment	An assessment conducted to determine program eligibility before an individual can be registered for WIOA program activities. The initial assessment may also be used to determine program suitability or referral to a more appropriate service provider, etc.
Leadership Development Opportunities	Providing youth with training and learning opportunities that develop leadership qualities. The opportunities may include: exposure to post-secondary education opportunities; community and service learning projects; peer-centered activities including peer mentoring and tutoring; organizational and team work training including team leadership; decision-making, including determining priorities; citizenship training; and life skills training such as parenting, work behavior training and budgeting of resources, employability, positive social behavior, etc.
Literacy	An individual's ability to read, write and speak English and to compute and solve problem at levels of proficiency necessary to function on the job, in the family and in society. One Stop Employment Solutions has established the level of proficiency to be the 9th grade level.
Local Area	A local Workforce Development Area designated by the Governor. The Greater Lincoln local area includes the 2 counties of Lancaster and Saunders in Nebraska.
Local Board	A local Workforce Development Board which serves the local workforce development area. The board sets policy and is responsible to administer the Workforce Innovation and Opportunity Act system in the local area. The Great Lincoln Workforce Board is comprised of private business, mandated partners, labor, and other community based members. Over 51% of the members represent the private business sector.
Long Term Training	A course of training that exceeds six (6) months in length.
Lower Living Standard Income Level	An income level that is adjusted for regional, metropolitan, urban and rural difference and family size. The income level is determined annually by the U. S. Secretary of Labor and is based on the most

Term	Definition
	recent lower living family budget issued by the Secretary. Guidelines for the lower living standard can be found in this manual.
Low Income Individual	An individual who: ▪ Receives free or reduced Lunch at LPS. ▪ Receives or is a member of a family that receives cash payments under a Federal, State or local income based public assistance program. ▪ Received an income, or is a member of a family that received a total family income for the six month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, cash payments described above and old age or survivor's insurance benefits received under the Social Security Act) which, in relation to family size, did not exceed the higher of: ○ The poverty line for an equivalent period or ○ Seventy percent (70%) of the lower living standard income level for an equivalent period. ▪ Is a member of a household that receives [or has been determined within the six (6) month period prior to application for program services to be eligible to receive] food stamps pursuant to the Food Stamp Act. ▪ Qualifies as homeless as defined by the Stewart B. McKinney Homeless Assistance Act ▪ In cases permitted by federal regulations, is an individual with a disability whose own income meets the low-income standard but who is a member of a family whose income does not meet the standard. This individual can be determined to be a "Family of One".
Memorandum of Understanding	An agreement developed and executed between the local Workforce Board, with the agreement of the Chief Elected Official, and the One Stop partner(s) regarding the operation of the One Stop delivery system in the local Workforce Area.
Needs Related Payments	Payments that provide financial assistance to participants for the purpose of enabling individuals to participate in training.
Non Traditional Employment	Occupations or fields of work for which individual from one gender comprise less than twenty-five percent (25%) of the individuals employed in each such occupation or field of work.
Not in Labor Force	An individual fourteen (14) years of age or over who did not work during the seven (7) consecutive days prior to application for program services and is not classified as employed or unemployed.
NEworks	A system which provides a computer-based registration and data access system. The system implements a common registration and data sharing process for mandated and optional partners of the WIOA programs, and contains a case management function which promotes customer service through more efficient client tracking, documentation and follow-up.
Objective Assessment	An examination of participant needs, vocational potential, and is client centered and flexible. The assessment is an ongoing process and

Term	Definition
	should be updated and amended as goals are achieved, or additional needs or required services are identified. The assessment provides the necessary information to develop a strategy which identifies and leads to realistic employment goals for the participant.
Occupational Skills	Primary occupational skills are those skills which encompass the proficiency to perform actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Secondary occupational skills are those skills which entail familiarity with, and use of set-up procedures, safety measures, work-related terminology, record keeping and paperwork, tools, equipment and materials, and breakdown and clean-up routines.
Offender	Any adult or juvenile who is, or has been, subject to any stage of the criminal justice process for whom WIOA services may be beneficial or any adult or juvenile who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction. This does not include driving citations.
One Stop Delivery System	A system under which different entities/organizations, who are responsible for administering separate workforce development, education, and other human resource programs and funding streams, collaborate to create a seamless system of service delivery that will enhance access to such program services and improve long-term employment outcomes for individuals receiving assistance.
One Stop Operator	An entity designated and certified by the local Workforce Development Board, with the agreement of the Chief Elected Official, to provide workforce development services and to coordinate the services of other service providers and One Stop partners.
One Stop Partners	The entities that participate in the delivery of human resource programs through the One Stop delivery system. WIOA identifies nineteen (19) entities required to participate and several other programs/entities which may be included. Other appropriate partners are identified in the Greater Lincoln Local Plan.
Out-of-School	Classification for a youth program client who is a school dropout and not attending an alternative school, or has graduated from high school or holds a GED and is not attending any school.
Participant	An individual who has registered, has an application, has been determined eligible to participate, and who is receiving workforce development services. The individual's participation shall be deemed to commence on the first day following a determination of eligibility on which the individual began receiving subsidized employment, training or other individualized services under Title I of WIOA.
Performance Measures	Measures established to provide an accountability system to assess the effectiveness of the local areas in achieving continuous improvement of workforce development activities in order to optimize the return on investment of program funds. The Greater Lincoln Workforce Area has established three measures for each program area that are core indicators of program performance. The measures and their baseline values (required attainment levels) are identified in the Greater Lincoln Local Plan and the operational policy on performance measures.

Term	Definition
Poor Work History	An individual who has worked no more than 3 consecutive months in the past 12 calendar months.
Positive Social Behaviors	Skills often referred to as “soft skills” or “employability skills” that should be incorporated in local programs as a part of their pre-service menu. Services provided to youth should focus on areas that may include, but are not limited to: positive attitudinal development, self-esteem building, cultural diversity training, work simulation activities, etc.
Poverty Line	An income level defined by the Office of Management and Budget and revised annually in accordance with the Community Service Block Grant Act. The poverty line is adjusted according to family size and local demographics.
Prevocational Skills	Prevocational Skills activities may include the development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, professional conduct, and to prepare individuals for unsubsidized employment and training.
Priority System	A system established to ensure that recipients of public assistance, other low-income individuals, and those who are basic skills deficient, receive a priority in the provision of career and training services under the WIOA. The priority system for Greater Lincoln is at least fifty-one percent (51%) of the adult participants must meet the above priority. Thirty five percent (49%) do not have to meet such guidelines.
Program of Training Services	A program of one or more courses or classes, or a structured regimen, that upon successful completion leads to a certificate, associate degree, baccalaureate degree or attainment of 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.
Public Assistance	Federal, State, or local government cash payments for which program eligibility is determined by a needs based test or income test.
Qualified Apprenticeship	A program approved and recorded by the U. S. Bureau of Apprenticeship and Training or by a recognized State apprenticeship agency. Approval for apprenticeship programs is by certified registration or other appropriate written credential.
Registration	The process an individual completes on the State Management Information System (NEworks). Registration on NEworks is required prior to a WIOA application being initiated on NEworks.
Requires Additional Assistance to Complete an Educational Program or to Secure and Hold Employment	An individual who requires additional assistance such as: remedial training to-enable the individual to compute math, solve problems or read or write at the 8.9 grade levels or to-obtain a GED, who is deficient in pre-employment/work maturity skills, native American youth, enrolled in an alternative education program, history of substance abuse by parent or client, youth with a disability including a learning disability, one or more grade levels below level appropriate to client’s age, unlikely to graduate due to lack of school credits, unable to obtain /maintain employment during the past 12 months, have been identified as needing training in English as a Second

Term	Definition
	Language to enable the individual to read, write, and speak English at a level necessary to function on the job, in the individual's family, and in society; or requires intensive "case management".
Sectarian Activity Limitation	A limitation imposed by the Workforce Innovation and Opportunity Act prohibiting participants from being trained in sectarian activities or employed to carry out the construction, operation, or maintenance of any part of any facility used, or will be used, for sectarian instruction or as a place of religious worship. However, workforce development funds may be used for the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship if the facility is part of a program or activity providing services to WIOA participants.
Self-Certification/Self-Attestation	An individual's signed attestation that the information he or she submits, to demonstrate eligibility for program services, is true and accurate. Self-certification shall only be used as a last resort in collecting and documenting eligibility information.
Self Sufficiency	Earning sufficient income to support a minimally decent standard of living without public cash assistance for participants who enter employment.
Short Term Training	Training that is six months or less in duration.
Sub recipient	An entity which receives a sub grant and is accountable to the primary grant recipient (or higher tier sub recipient) for the funds awarded. Currently One Stop Employment Solutions is the sub recipient of the Youth WIOA funds for the Greater Lincoln Workforce Development Area.
Subsequent Eligibility (as it applies to ETP's)	Each approved training provider, on an annual basis, will be required to meet the performance goals established by the Workforce Development Board and submit information including program completion rates, percent of individuals who obtain unsubsidized employment, placement wages, etc. to remain subsequently eligible to provide training services.
Substantial Layoff	A reduction in a workforce which is not the result of a plant closure and results in an employment loss at the single site of employment during any thirty day period for: at least thirty three percent of the workforce and at least fifty employees (excluding those employees regularly working less than twenty hours per week) or at least five hundred employees (excluding those employees regularly working less than twenty hours per week).
Summer Youth Employment	A summer employment activity for youth participating in Title I WIOA services which links academic and occupational learning, and provides opportunities to help prepare youth for employment.
Support Services	Assistance with transportation, childcare, dependent care, housing, medical, etc. which is necessary to enable a participant to participate in the workforce development activities authorized by the Act.

Term	Definition
	Support services may only be provided to individuals who are registered and determined eligible for career or training services, and are unavailable through other programs providing such services.
Training Services	Services provided by an approved training provider which includes occupational skill training, including training for nontraditional employment; workplace training; skill upgrading and retraining; entrepreneurial training; job readiness and job development training; adult education and literacy; incumbent worker training, and on-the-job training and customized training.
Unemployed Individual	An individual who is without a job, and who wants and is available for work. The U.S. Bureau of Labor Statistics determination of "without a job" is: an individual who did not work during the seven consecutive days prior to program application, who made specific efforts to find a job within the past four weeks prior to application, and was available for work during the seven consecutive days prior to program application.
Unit of General Local Government	Any general-purpose political subdivision of a State that has the power to levy taxes and spend funds as well as general corporate and police powers.
Unsubsidized Employment	A part-time or full-time job in the private or public sector, where wages are completely paid by the employer.
Vendor	An entity responsible for providing generally required goods or services to be used in the Workforce Development program. The goods and services may be for the recipients or sub recipients own use or for the use of program participants.
Veteran	An individual who served in the active military, naval or air service for a period more than or equal to 180 days for other than training purposes and who was discharged or released from such service under conditions other than dishonorable. Reservists and National Guard members may also qualify if they served at least one day on Active Duty due to armed conflict and/or crisis involving national security (Title 10 Activation).
Veteran, Disabled	A veteran who is entitled to compensation under laws administered by the Veteran's Administration or an individual who was discharged or released from active duty because of a service-connected disability.
Workforce Development Activities	An array of activities permitted under Title I of the Workforce Innovation and Opportunity Act which include employment and training activities for adults, dislocated workers and youth.
Work Readiness Skills Goal	Skills include world of work awareness, labor market knowledge, occupational information, values clarification and personal understanding, career planning and decision-making, and job search techniques (resumes, interviews, applications, and follow-up letters). They also encompass survival/daily living skills such as using the phone, telling time, shopping, renting an apartment, opening a bank account, and using public transportation. They also include positive

Term	Definition
	work habits, attitudes, and behaviors such as punctuality, regular attendance, presenting a neat appearance, getting along and working well with other, exhibiting good conduct, following instructions and completing tasks, accepting constructive criticism from supervisors and co-workers, showing initiative and reliability, and assuming the responsibilities involved in maintaining a job. This category also entails developing motivation and adaptability, obtaining effective coping and problem-solving skills, and acquiring an improved self-image.
Youth Activity	A workforce development activity that is carried out for youth.
Youth Committee	A committee established by the Workforce Board to provide expertise on youth policy, to assist the Board in developing and recommending local youth employment and training policy and devise practice by broadening the youth employment and training focus in the community to incorporate a youth development perspective, and to establish linkages with other organizations serving youth in the local area.
Youth Eligibility	Eligible youth will be low-income, ages 14 through 24, dependent on whether they are determined to be In-School or Out-of-School. See the Youth Eligibility section for the full definition and items of eligibility.
Youth Services	Enrolled youth receive initial and objective assessments, eligibility determination and an individual service strategy reflecting an age appropriate career goal. Youth services include the same activities as Adult and DLW services but are applied in different fashions according to the Individual Service Strategy (ISS). Youth services also include fourteen youth elements, which are outlined in the Youth Section of this manual as well as in WIOA and State Policy.
Youth Training Account (YTA)	An account established on behalf of a Youth participant which will be used to purchase youth training services from eligible youth training providers who are listed on NEworks.

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 11

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

Attachments

ONE STOP EMPLOYMENT SOLUTIONS

SECTION 12

WORKFORCE INNOVATION AND OPPORTUNITY ACT PROGRAM

Local Policy