

40. Iowa Title I Adult & Dislocated Worker Services

Workforce Innovation and Opportunity Act (WIOA)

Iowa Workforce Development
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30.1. Purpose

This guidance is being issued pursuant to the Workforce Innovation and Opportunity Act (WIOA).¹ These guidelines are subject to revision as additional guidance is issued by the United States Department of Labor (USDOL) or other applicable entity, a change in workforce trends, or other factors necessitates.

The purpose of this guidance is to assist local areas in developing policies relating to certification of participants served with WIOA Title I Adult and/or WIOA Title I Dislocated Worker Program funds – hereinafter referred to as “A/DW” or “A/DW program.”

Local areas are encouraged to apply these guidelines in the development of new or revised policies and implementation of innovative programming. Current policies and practices should be examined to ensure that they reflect access to all through a focus on the removal of barriers for the state’s A/DW population.

Staff providing services under this program should adhere to all policies included in this manual, as well as any local policies outlined in an area’s local service plan.

The adult and dislocated worker programs work in coordination with all partners, and are a pivotal piece of the one-stop delivery system. The one-stop system provides universal access to career services to meet the diverse needs of adults and dislocated workers. WIOA intends for all adult and dislocated workers to be able to access these vital career services and training services in the one-stop delivery system, which is referred to throughout Iowa’s A/DW policy guidance.

WIOA provides for a workforce system that is universally accessible, customer centered, and training that is job-driven. The goal of service should be to guide participants on ways to enhance their skill sets and increase their likelihood of gaining and retaining self-sufficiency through employment – while working to reduce and remove barriers to employment.

The one-stop delivery system is the foundation of the workforce system. The system provides collective access to career services to meet the diverse needs of job seekers. Career and training services, tailored to the individual needs of jobseekers, form the backbone of the one-stop delivery system. Some job-seekers require self-service or other basic career services such as referrals to job listings or labor market information, while others require more comprehensive services including skills assessments, career planning, and development of an individual employment plan.

Basic career services must be made available to all job seekers and include services such as labor exchange services, labor market information, job listings, and information on partner programs. Individualized career services identified in WIOA and described in these proposed regulations are to be provided by local areas as appropriate to help individuals to obtain or retain employment.

One-stop services aim to respond to business demand for workforce improvement by up-skilling individuals and equipping them with current, in-demand skills to help them compete in today’s job market. One-stop center teams ensure all customers are welcomed to the center and made eligible for as many services as necessary to meet their employment objective by:

¹ For more information, go to: <https://www.federalregister.gov/documents/2016/08/19/2016-15975/workforce-innovation-and-opportunity-act>

- Recommending services customized to customer needs.
- Providing immediate access to multiple services at the time of the first visit.
- Encouraging continuous customer engagement through the ongoing delivery of quality services.

One-stops will strive to offer, promote, and deliver a comprehensive series of services:

- Design and continuously improve services to respond to the local economy and business demand.
- Recognize all center customers may need both skills and employment while ensuring concurrent delivery of both services to all customers.
- Increase the quantity, quality, and use of skill advancement for employment services.
- Provide and emphasize more value-added, staff-assisted services.

One-stop center teams will ensure that every center visit and service adds value for each and every customer and contributes to positive individual outcomes according to the outlined One-stop customer process.

30.2. One-Stop Process

Individuals receiving services in the one-stop centers must receive the career service(s) that best meets the needs of the individual to meet his or her career pathway goals. Services should be delivered according to relevance and need, rather than in a sequential, or prescribed manner that does not center on a participant's unique needs.

Training is made available to individuals after an interview, assessment or evaluation determines the individual requires training to obtain employment, remain employed or for career advancement.

Registration and participation are two separate functions in the process by which individuals seek direct, one-on-one staff assistance from the one-stop system. The distinction is important for recordkeeping and program evaluation purposes. Individuals who are primarily seeking information are not treated as participants and their self-service or informational search requires no registration. When an individual seeks more than minimal assistance from staff in taking the next step towards self-sufficient employment, the person must be registered and eligibility must be determined.

30.3. Customer Engagement

One-stop teams will conduct an initial basic assessment of individual's needs and career goals. Customers will have immediate access to employment and skill advancement services in basic career services.

Additional opportunities may be offered for individualized career services, in order for a customer to achieve their career goals and obtain or retain employment.

Staff will ensure all center customers have seamless access to all Iowa *WORKS* services. Customers who receive services through Wagner-Peyser (WP) and meet eligibility requirements for WIOA Title I Adult and/or WIOA Title I Dislocated Worker will automatically be co-enrolled in A/DW program(s) when appropriate. Co-enrollment into other programs including WIOA Title I Youth, PROMISE JOBS, Veteran's programs, etc. may be provided as appropriate.

One-stop centers must engage Unemployment Insurance (UI) claimants, to ensure maximum availability of employment and career services to help claimants return to work as quickly as possible.

Staff will encourage and facilitate access for center customers to all appropriate career services at each and every center visit to continuously engage them in the service delivery process until employed in self-sufficient employment. Customers will have continued access to services until their career or employment goal is achieved.

30.4. Services

Services include basic career services, individualized career services, training services and follow-up services. All center customers will have access to any of the basic career services immediately and continuously without further eligibility or documentation requirements. Individuals receiving services in the one-stop centers must receive the service(s) that is needed to assist the individual to meet his or her career goals, and does not need to follow a fixed sequence of services.

Services provided in the one-stop can also be accessed online. An individual must be 18 years of age or older to receive services in the adult program.

Priority for individualized career services and training services funded with Title I Adult funds must be given to the following populations:

- Veterans and eligible spouses,
- Low-income adults,
- Public assistance recipients,
- Individuals who are basic skills deficient, and
- Other non-covered persons (See Priority of Service for additional details and eligibility).

30.4.1. Basic Career Services

Basic career services must be made available to all job seekers and include services such as labor exchange services, labor market information, job listings, and information on partner programs.

The following services must be included:

- Determinations of whether the individual is eligible to receive assistance from the adult, dislocated worker, or youth programs;
- Outreach, intake (including worker profiling), and orientation to information and other services available through the one-stop delivery system;
- Initial assessment of skill levels including literacy, numeracy, and English language proficiency, as well as aptitudes, abilities (including skills gaps), and supportive service needs;
- Labor exchange services, including job search and placement assistance, and, when needed by an individual, career counseling, including:
 - Provision of information on in demand industry sectors and occupations; and
 - Provision of information on nontraditional employment; and
 - Appropriate recruitment and other business services on behalf of employers, including information and referrals to specialized business services other than those traditionally offered through the one-stop delivery system;

- Provision of referrals to and coordination of activities with other programs and services, including programs and services within the one-stop delivery system and, when appropriate, other workforce development programs;
- 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 listings in labor market areas;
 - Information on job skills necessary to obtain the vacant jobs listed; and
 - Information relating to local occupations in demand and the earnings, skill requirements, and opportunities for advancement for those jobs.
- Provision of performance information and program cost information on eligible providers of training services by program and type of providers;
- Provision of information, in usable and understandable formats and languages, about how the local area is performing on local performance accountability measures, as well as any additional performance information relating to the area's one-stop delivery system;
- Provision of information, in usable and understandable formats and languages, relating to the availability of supportive services or assistance, and appropriate referrals to those services and assistance, including:
 - Child care;
 - Child support;
 - Medical or child health assistance available through the State's Medicaid program and Children's Health Insurance Program;
 - Benefits under SNAP; assistance through the earned income tax credit; housing counseling and assistance services sponsored through the U.S. Department of Housing and Urban Development (HUD); and
 - Assistance under a State program for Temporary Assistance for Needy Families, and other supportive services and transportation provided through that program.
- Provision of information and assistance regarding filing claims for unemployment compensation, by which the one-stop must provide meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation.
 - Meaningful assistance is defined as providing assistance on-site using staff who are well-trained in unemployment compensation claims filing and the rights and responsibilities of claimants; or providing assistance by phone or via other technology, as long as the assistance is provided by trained and available staff and within a reasonable time.
 - The costs associated in providing this assistance may be paid for by the State's unemployment insurance program, or the WIOA Title I Adult or Dislocated Worker programs, Wagner-Peyser Employment Services, or some combination thereof.
- Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA.

If one-stop center staff determine that individualized career services are appropriate for an individual to obtain or retain employment, these services must be made available to the individual. These services must be available in all one-stop centers. One-stop center staff may use recent previous assessments by partner programs to determine if individualized career services would be appropriate.

These services include:

- Comprehensive and specialized assessments 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 and evaluation to identify employment barriers and appropriate employment goals.
- Development of an individual employment plan, to identify 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, the eligible training providers;
- Career pathways to attain career objectives;
- Group and/or individual counseling and mentoring;
- Career planning;
- Short-term pre-vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training, in some instances pre-apprenticeship programs may be considered as short-term pre-vocational services;
- 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, and obtaining skills necessary for successful transition into and completion of postsecondary education, or training, or employment;
- Financial literacy services;
- Out-of-area job search assistance and relocation assistance; and
- English language acquisition and integrated education and training programs.

Individualized Career Services Related to Experiential Learning

- Pre-Apprenticeship training;
- Job shadowing;
- Transitional jobs;
- Internships and work experiences that are linked to careers;
- On-the-Job Training.

Training services are provided to equip individuals to enter the workforce and retain employment or for career advancement. There is no sequence of service requirement for training.

Training services may include:

- Occupational skills training, including training for nontraditional employment;
- On-the-job training, including Registered Apprenticeship which incorporates both OJT and classroom training;
- Incumbent worker training;
- Programs that combine workplace training with related instruction, which may include cooperative education programs;
- Training programs operated by the private sector;
- Skill upgrading and retraining;
- Entrepreneurial training;
- Job readiness training provided in combination with the training services described in any of the activities above;
- Adult education and literacy activities, including activities of English Language acquisition and integrated education and training programs, provided concurrently or in combination with services provided in any of the activities above; and
- Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

Training services may be provided after an interview, assessment and career planning under when the individual meets the following criteria:

- Is 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 alone - Local areas must ensure they formulate a process for determining self-sufficiency standards for individuals to receive training;
- Is 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, through career services alone;
- Has the skills and qualifications to successfully participate in the selected program of training services;
- Is unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds or Federal Pell Grants, or requires WIOA Title I assistance in addition to other sources of grant assistance, including Federal Pell Grants;
- Is a member of a worker group covered under a petition filed for Trade Adjustment Assistance (TAA) and is awaiting a determination. If the petition is certified, the worker may then transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA Title I services;
- Is determined eligible in accordance with priority of service for adults if training services are provided WIOA Title I-Adult; and

- Selected a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or a geographic area in which the adult or dislocated worker is willing to commute or relocate.

The selection of training services must be conducted in a manner that maximizes customer choice, is linked to in-demand occupations, informed by the performance of relevant training providers, and coordinated to the extent possible with other sources of assistance.

30.4.4. Follow-Up Services

Follow-Up Services must be provided, as appropriate, including: counseling regarding the workplace, for participants in adult or dislocated worker workforce investment activities who are placed in unsubsidized employment, for up to 12 months after the first day of employment. Follow-up services do not extend the date of exit in performance reporting.

30.5. Collaboration with Business Services

Under WIOA, Title I funds may be used to provide additional services including job seeker services and employer services. Employer services provided by Iowa *WORKS* Business Services teams may include:

- Customized screening and referral of qualified participants in career and training services to employers;
- Customized employment-related services to employers, employer associations, or other such organizations on a fee-for-service basis that are in addition to labor exchange services available to employers under Wagner-Peyser; and,
- Activities to provide business services and strategies that meet the workforce investment needs of area employers, as determined by the Local Board and consistent with the local plan.

The provision of these services aid in the overarching goal of assisting individuals to gain self-sufficient employment.

30.6. Coordination of Services

Coordinating efforts among program staff improves efficiency and effectiveness in service delivery, resulting in an increase in the likelihood of participant success across all programs.

The benefits of coordination are many, and can include, but are not limited to the following:

- Barriers can be identified and resolved more quickly and conscientiously;
- Improved customer service and streamlined service delivery across multiple programs;
- Reduction or elimination in duplication of services and staff efforts;
- Increased connection to training and income support resources for the participant;
- Structured communication and consistent messaging assist the participant in navigating systems;
- Efficient use of staff and financial resources;
- Increased access to a wide array of customized services;
- Shared performance outcomes; and,
- Better employment services connected to employer needs for all job seekers.

30.6.1. Coordination with One-Stop Partners and Co-enrollment

WIOA encourages genuine collaborations among core and other partners across the state. Iowa's core partners include Iowa Workforce Development, Iowa Vocational Rehabilitation Services, Iowa Department for the Blind and Iowa Department of Education – Adult Education and Literacy. Under WIOA, the goal of the workforce delivery system is to assist more Iowans in becoming Future-Ready workers. The one-stop center is where education, rehabilitation, workforce, and economic development resources come together to ensure all Iowans have access to an integrated and efficient workforce delivery system. It is essential that local areas work with their core and other partners to develop meaningful communication, referral, and joint-service plans that center on the customer.

Co-enrollment occurs when a participant is enrolled in additional programs for which they are eligible and that provide added value to the participant's success. Co-enrollment benefits the participant by streamlining processes across two or more programs while improving efficiency and service delivery.

There is potential for coordination of services among numerous programs/services to include, but not limited to:

- Adult/Dislocated Worker
- Youth
- **PROMISE JOBS**
- Jobs for Veterans State Grant (JVSG)
- Trade Adjustment Assistance (TAA)
- Migrant and Seasonal Farm Worker (MSFW)
- Ticket to Work
- Grants (National Dislocated Worker Grants, Disability Employment Initiatives, etc.)
- Registered Apprenticeships

In order for co-enrollment to be effective, it is imperative that all staff working with the participant work in a fully integrated, congenial, and supportive manner and in accordance with Iowa's integrated service delivery model. Staff collaborating to serve the participant should work together to ensure that the current needs and progress of the participant are being accurately communicated and that identified needs are being met in a coordinated manner. Career planners should conduct integrated service delivery meetings with the participant to expedite meaningful communication that benefits the participant and increases their chances for success.

30.6.2. Coordination with Trade Adjustment Act (TAA)

Co-enrollment with Trade Adjustment Act (TAA) is important to the effective delivery of eligible services to ensure the participant receives all necessary services to address as broad a range as possible of a participant's identified needs.

WIOA Title I programing may allow up to 75 percent reimbursement to employers for OJT in certain circumstances, while the TAA program allows reimbursement up to 50 percent. For OJT training for a co-enrolled TAA participant, the TAA Program may reimburse employers up to 50 percent, and WIOA Title

I may reimburse employers up to an additional 25 percent, bringing the total reimbursement to employers up to 75 percent to align TAA program benefits with WIOA Title I program benefits.

Staff should consider the following when co-enrolling eligible participants in TAA services:

- TAA participants should be served in a similar manner to a dislocated worker.
- Most TAA participants would meet the definition of dislocated worker for WIOA Title I and should be served under both programs.
- Co-enrollment could also occur with National Dislocated Worker Grants, Vocational Rehabilitation, and other partner program/grant if a need is identified.
- When a TAA participant is served under more than one program, TAA funds should always be utilized first. Partner program funds should only be utilized when it is not possible to use TAA funds as duplication of services is not allowed.
- TAA participants should not be subject to duplicative assessment. Under TAA/WIOA Title I, only one set of assessments should be completed.
- Participants enrolled into the Title I Dislocated Worker program prior to the certification of a TAA petition are required to use the ETPL for selection of training providers/programs. If the eligibility status for TAA is known at time of the enrollment into both programs, the use of ETPL is exempt. If a dislocated worker identifies their job was lost due to foreign competition the State Trade Office should be contacted to file a petition for TAA benefits.
- Co-enrollment may also assist in making additional funds available for OJT.

30.6.3. Coordination with PROMISE JOBS

PROMISE JOBS (PJ) provides services to targeted populations of low-income individuals who are also participating in the state's TANF program. When considering priority of service for co-enrolled PROMISE JOBS participants, when priority is given to low-income individuals, PJ participants automatically meet low-income eligibility when applicable.

30.6.4. Coordination with VETS

Disabled Veteran Outreach Program specialists (DVOP) provides intensive services to eligible veterans and spouses. Those veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority of services provided with WIOA adult formula funds.

Veterans and eligible spouses receive priority of service for all DOL-funded job training programs.

All Title I staff are required to be knowledgeable of Iowa's Veterans Priority of Service guidance.

30.7. Adult Eligibility and Dislocated Worker Eligibility

30.7.1. Adult Eligibility

Applicants must meet all three of the following criteria in order to participate in the WIOA Title I Adult Program:

- Eighteen (18) years of age or older; and

- Registered with the selective service, if applicable; and
- A citizen or national of the United States, a lawfully admitted permanent resident alien, a lawfully admitted refugee or parolee or an individual authorized by the Attorney General to work in the United States.

To be eligible to receive Individualized and Training services in the WIOA Title I Adult program eligibility documentation and verification must comply with the before mentioned items, and have verified low income status through one of the following:

- Wage and family size verification, or
- Verification of receipt of public assistance, or
- Verification of homelessness.

If an adult is enrolled in individualized or training services and works in a permanent, full-time job that leads to self-sufficiency, staff must determine if WIOA Title I services can continue to fund the individualized or training services based on the following criteria:

- If the individual has accepted full-time permanent employment to meet basic needs of the individual or family to meet their immediate employment goal, individualized or training services can continue.
- If the job that the individual has taken requires the training he or she is currently receiving, individualized or training services can continue. For example, a participant must obtain a teaching certificate to get or keep a teaching job.
- If the participant has obtained full-time permanent employment and is no longer pursuing the career goal in the IEP but simply wants to complete the individualized or training services, funding for the individualized or training services should cease.

30.7.2. Dislocated Worker Eligibility

To be eligible to participate in the WIOA Title I Dislocated Worker program, an applicant must meet all three of the following criteria. To be eligible to receive Individualized and Training Services in the WIOA Dislocated Worker program, eligibility documentation and verification of the three criteria below must be included in the participant file and/or data management system.

- Register for the selective service, if applicable; and
- A citizen or national of the United States, a lawfully admitted permanent resident alien, a lawfully admitted refugee or parolee or an individual authorized by the Attorney General to work in the United States; and
- Self-declare eligibility as a dislocated worker through by identifying as one of the types of dislocated workers listed in Table 1 below.

Table 1: Dislocated Worker Eligibility Criteria

| | Type | Additional Information |
|---|--|------------------------|
| 1 | Participant has been terminated or laid off, has | None. |

| | Type | Additional Information |
|---|--|---|
| | received a notice of termination or layoff, from employment including separation from active military service (other than dishonorable discharge). | |
| 2 | Participant is eligible for, or has exhausted entitlement to, unemployment compensation. | None. |
| 3 | Participant has been employed for a duration sufficient to demonstrate to the appropriate entity at a one-stop center, 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 is unlikely to return to a previous industry or occupation. | <p><i>Has been employed for a duration sufficient to demonstrate attachment to the workforce</i> means that the individual has been employed at least 26 of the last 52 weeks.</p> <p><i>Unlikely to return to a previous industry or occupation</i> is defined as meeting any one of the following:</p> <ul style="list-style-type: none"> ▪ Any individual profiled for Re-Employment Services (RES)/Reemployment Services and Eligibility Assessment (RESEA) would meet the definition of unlikely to return; ▪ An individual who is co-enrolled in the Trade Adjustment Act (TAA) program would meet the definition of unlikely to return; ▪ Barriers that may prevent a Dislocated Worker from returning to the previous occupation; <p>If an individual has received a notice of termination or layoff and there is no specific or definitive recall date regardless of any employee/employer agreements or regardless of being seasonal in nature or regardless of being classified as temporary.</p> <p>Whenever a determination is made that an individual is unlikely to return to a previous industry or occupation, the specific condition from the definition that was used to make this determination must be supported with sufficient documentation and clearly identified in the data management system and participant file.</p> |
| 4 | Participant 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, military installation or enterprise. | <p><i>Substantial layoff</i> is defined as meeting any one of the following:</p> <ul style="list-style-type: none"> ▪ Any layoff event impacting one-third of the total employment at any single location ▪ Any layoff reported as an Iowa WARN event ▪ Any layoff reported as a Federal WARN event ▪ Any layoff event impacting 25 or more employees at a single location |
| 5 | For purposes of eligibility to | <ul style="list-style-type: none"> ▪ None. |

| | Type | Additional Information |
|---|---|---|
| | receive services other than training services or support services, participant is employed at a facility at which the employer has made a general announcement that such facility or military installation will close within 180 days. | |
| 6 | Participant was self-employed (including employment as a farmer, 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. | <p><i>Due to general economic conditions in the community in which the individual resides is defined as any one of the following:</i></p> <ul style="list-style-type: none"> ▪ The business has declared bankruptcy; ▪ Failure of one or more businesses to which the self-employed individual supplied a substantial proportion of products or services; ▪ Failure of one or more businesses from which the self-employed individual obtained a substantial proportion of products or services; ▪ Substantial layoff(s) from or permanent closure(s) of one or more plants or facilities that support a significant portion of the local economy; ▪ Depressed price(s) or market(s) for the article(s) produced by the self-employed individual; or ▪ Whenever a determination is made that a formerly self-employed individual is unemployed from his or her business due to general economic conditions in the community in which the individual resides, the specific condition from the definition that was used to make this determination must be clearly identified in the data management system. <p><i>Note: Full-time, secondary students are not considered dislocated workers if the family business becomes insolvent. Post-secondary students and out-of-school youth must demonstrate that their primary occupation was in the family business prior to their application for program services.</i></p> |
| 7 | Is a displaced homemaker. | <p>The term <i>displaced homemaker</i> means an individual who has been providing unpaid services to family members in the home and who:</p> <ul style="list-style-type: none"> ▪ Has been dependent on the income of another family member but is no longer supported by that income; and ▪ Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. ▪ Is the dependent spouse of a member of the Armed Forces on active duty and whose family income is significantly reduced because of a deployment, a call to order to active duty pursuant to a provision of law, or relocation to accommodate a permanent change of duty station or the service-connected |

| Type | Additional Information |
|------|------------------------------------|
| | death or disability of the member. |

In determining the initial eligibility for dislocated workers, an individual may continue to be considered to be dislocated from a previous employer until:

- The individual works in a permanent, full-time job (30 hours per week) for four weeks;
- After an individual works for four weeks and is laid off again or subject to a plant closure, this employer becomes their “new” employer of dislocation; or
- If there is a NEG or SEG for the original employer of dislocation and the individual was part of the target group, the individual may be served by the NEG or SEG funds if they are still available and the individual meets the definition of a dislocated worker. This is true even though the individual has worked for a new employer since the original dislocation.

If a dislocated worker is enrolled in a training service and works in a permanent, full-time job that leads to self-sufficiency, staff must determine if WIOA Title I services can continue to fund the training service based on the following criteria:

- If the individual has accepted full-time permanent employment to meet basic needs of the individual or family to meet their immediate employment goal, training services can continue.
- If the job that the individual has taken requires the training he or she is currently receiving, training services can continue. For example, a participant must obtain a teaching certificate to get or keep a teaching job.
- If the participant has obtained full-time permanent employment and is no longer pursuing the career goal in the IEP but simply wants to complete the training services, funding for the training services should cease. In the event this precludes the participant from completing the training program, consideration to continue funding the training is at the discretion of the local board.

WIOA Title I Dislocated Worker program does not require an individual to return to the employer of dislocation.

30.7.3. Selective Service

In order to participate in any WIOA-funded activity, an individual must comply with Section 3 of the Military Selective Service Act, by registering for the Selective Service, when applicable.

For males who are at least 18 years of age but less than 26 years of age, a determination must be made as to whether such males have complied with the Selective Service requirements. If the individual has not complied, the individual must register with the Selective Service prior to enrollment into WIOA Title I services.

For males 26 years of age and older who were born on or after January 1, 1960, a determination must be made as to whether the male has complied with the Selective Service requirements. If the male has not complied with Section 3 of the Military Selective Service Act, the following procedures must be followed:

- A determination must be made as to whether the male has received a discharge from the U.S. Military Service. Appropriate documentation would include a copy of the individual's military discharge (Form DD-214) or verification from an authorized representative of Veteran Affairs.
- If the male is an immigrant alien or refugee, parolee, asylee, seasonal agricultural worker or IRCA-legalized alien born after December 31, 1959, and was 26 years of age or older at the time of entry into the United States, Selective Service registration is not required. Appropriate documentation would include Immigration and Naturalization Service (INS) documents (documenting age, date of entry into the United States and alien status as immigrant, refugee, parolee, asylee, seasonal agricultural worker or legalized non-immigrant under the IRCA).
- When a male applicant 26 years of age or older who was born on or after January 1, 1960, has not registered with Selective Service, the male must be advised that a "Status Information" letter is required from the Selective Service before he may be determined eligible to participate in any WIOA Program.

To receive a "Status Information" letter from the Selective Service System, the individual may call 1-847-688-6888 and wait until an operator comes on the line. The individual may also send a written request to:

Selective Service System
 ATTN: SIL
 P.O. Box 94638
 Palatine, IL 60094-4638

The individual must provide the following information regardless of how the letter is requested: name; social security number; date of birth; return address; and a description of the circumstances.

The Selective Service System (SSS) will not make an actual determination, but will issue a "Status Information Letter." Any male over 26 years old who receives a "Status Information Letter" from the SSS indicating that he was required to register, but did not, and now cannot be registered because the law does not allow for registration after the age of 26, is presumptively disqualified from participation in WIOA Title I funded activities and services. The burden then falls on the applicant to provide evidence to the Title I Service Provider explaining why he failed to register with the SSS. This could include a written explanation from the applicant, stating his circumstances at the time of the required registration, and his reasons for not registering, together with supporting documentation. Third party affidavits from parents, teachers, employers, doctors, etc. concerning reasons for not registering may also be provided.

The WIOA Title I service provider must use the information provided by the applicant to make a determination as to whether the applicant knowingly and willfully failed to register. If after reviewing the evidence and the service provider determines that the preponderance of the evidence shows that the man's failure to register was not knowing and willful, and he is otherwise eligible, services may be granted. If the determination is that the preponderance of evidence shows the applicant's failure to register was known and willful, WIOA Title I services must be denied.

Applicants denied services must be advised that they may appeal the decision through the region's complaint procedure.

If an individual who is required to register at age 18 turns 18 during his period of WIOA enrollment, he must register in order to remain enrolled in the program. Failure to register must result in immediate termination from WIOA Title I program.

Information relating to registration status can be obtained by calling the Selective Service System telephone number, (847) 688-6888 or via the Internet at <http://www.sss.gov>.

30.7.4. Priority of Service

WIOA establishes a priority requirement with respect to funds allocated to a local area for adult employment and training activities. One-stop center staff responsible for these funds must give priority to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient in the provision of individualized career services and training services. Under WIOA, priority must be provided regardless of the level of funds. Furthermore, unlike WIA where priority was required only when funds were limited, “priority must be given regardless of funding levels” in WIOA. As described in the Act, WIOA is meant to increase need, “particularly those with barriers to employment.”

WIOA re-affirms that veterans continue to receive priority of service in ALL DOL-funded training programs but that a “veteran must still meet each program’s eligibility criteria.” Thus for WIOA Title I Adult services, the program’s eligibility and priority considerations must be made first, and then veteran’s priority applied.

To determine eligibility for veterans and spouses:

- First, to veterans and eligible spouses who are also included in the groups given statutory priority for WIOA Adult formula funding. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services with WIOA Adult formula funds for individualized career services and training services. *(NOTE: Military earnings are not to be included when calculating income for veterans or transitioning service members for this priority.)*
- Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
- Third, to veterans and eligible spouses who are not included in WIOA’s priority groups.
- Fourth, priority populations established by the Governor and/or Local WDB.
- Last, to non-covered persons outside the groups given priority under WIOA.

Local areas must give priority of service to participants that fall into one of the below priority categories:

- Recipients of public assistance
- Other low-income individuals. The term “low income individuals” is defined as an individual who:
 - 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 (SNAP), TANF, Supplemental Security Income (SSI) under Title XVI of the Social Security Act, or state or local income-based public assistance program; or

- Receives an income or is a member of a family receiving an income that in relation to family size, is not in excess of the current U.S. DOL 70 percent Lower Living Standard Income Level and U.S. Department of Health and Human Services Poverty Guidelines (*NOTE: Under WIOA, there is no exclusion of payments for unemployment compensation, child support payments, and old-age survivors insurance benefits from the income calculations for determining if an individual is low-income*), or
 - Is a homeless individual, or
 - Is an individual with a disability whose own income meets the income requirements above, but who is a member of a family whose income does not meet this requirement.
- Individuals who are basic skills deficient. The term “basic skills deficient” is as a youth or adult who 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. An individual who is basic skills deficient, must meet at least one of the following:
 - Lacks a high school diploma or equivalency and is not enrolled in secondary education; or
 - Scores below 9.0 grade level (8.9 or below) on the TABE; CASAS or other allowable assessments as per National Reporting System (NRS) developed by the U.S. Department of Education’s Division of Adult Education and Literacy or
 - Is enrolled in Title II adult education (including enrolled for ESL); or
 - Has poor English language skills (and would be appropriate for ESL even if the individual isn’t enrolled at the time of WIOA participation.)
 - The career planner makes observations of deficient functioning and records those observations as justification in the data management system or as a case note (same as above).
 - Individuals (non-covered persons) who do not meet the above priorities may be enrolled on a case by case basis with documented managerial approval. The WIOA eligible adult must meet one or more of the following categories of an individual with a barrier to employment:
 - Displaced homemakers;
 - Indians, Alaska Natives, and Native Hawaiians;
 - Individuals with disabilities, including youth who are individuals with disabilities;
 - Older individuals (age 55 and older);
 - Ex-offenders;
 - Youth who are in or have aged out of the foster care system;
 - Individuals who are:
 - English language learners
 - Individuals who have low levels of literacy (an individual is unable to compute or solve programs, or read, write, or speak English at a level necessary to function on the job, or in the individual’s family, or in society); and
 - Individuals facing substantial cultural barriers;
 - Eligible migrant and seasonal farmworkers;
 - Individuals within two years of exhausting lifetime TANF eligibility;
 - Single parents (including single pregnant women);
 - Long-term unemployed individuals (unemployed for 27 or more consecutive weeks).

30.7.5. Underemployed Individuals

In addition to providing career and training services to individuals who are unemployed, there remains a significant population of job seekers who are underemployed. Individuals who are underemployed may include:

- Individuals employed less than full-time who are seeking full-time employment;
- Individuals who are employed in a position that is inadequate with respect to their skills and training;
- Individuals who are employed who meet the definition of a low-income individual; and
- Individuals who are employed, but whose current job's earnings are not sufficient compared to their previous job's earnings from their previous employment, per State and/or local policy.

Individuals who are underemployed and meet the definition of a low-income individual may receive career and training services under the Adult program on a priority basis. Individuals who meet the definition of an individual with a barrier to employment who are underemployed may also be served in the Adult program. Individuals who were determined eligible for the Dislocated Worker program who are determined by State and/or local policies to be underemployed, may still be considered eligible for career and training services under this program. States and local areas are encouraged to develop policies and procedures for determining underemployment for both adult and dislocated workers.

30.8. Veterans' Priority of Service

The Jobs for Veterans Act provides an emphasis on serving veterans by establishing a priority of service for veterans and eligible spouses in all employment and training programs funded by the Department of Labor, including Wagner-Peyser, WIOA and other job training programs offered through competitive grants. Priority of Service is the right of an eligible "Covered Person" to be given priority of service over an eligible non-covered person for the receipt of employment, training and placement services, notwithstanding other provisions of the law.

Covered Persons take precedence over non-covered persons in obtaining services and shall receive access to services and resources earlier in time than a non-covered person. Procedures or policies that restrict a veteran's access to WIOA or WP services, even if such restrictions are intended to provide the veteran with specialized services, are contrary to the priority of service requirements.

"Covered Persons" means veterans and the spouses of any of the following:

- Any veteran who died of a service-connected disability;
- 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:
 - Missing in action;
 - Captured in the line of duty by a hostile force; or
 - Forcibly detained or interned in the line of duty by a foreign government or power; or

- Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs or any veteran who died while such a disability was in existence.

Covered Persons must have served at least one day in the active military, naval or air service, and were discharged or released under conditions other than dishonorable as specified in 38 U.S.C 101(2). Active service includes full-time Federal service in the National Guard or a Reserve component. It does not include full-time duty performed strictly for training purposes, nor does it include full-time active duty performed by National Guard personnel mobilized by the State rather than federal authorities.

The term “surviving spouse” means a person who was the spouse of a veteran at the time of the veteran’s death, and who lived with the veteran continuously from the date of marriage to the date of the veteran’s death (except where there was a separation which was due to the misconduct of, or procured by, the veteran without the fault of the spouse) and who has not remarried or (in cases not involving remarriage) has not since the death of the veteran, and after September 19, 1962, lived with another person and held himself or herself out openly to the public to be the spouse of such other person.

The Jobs for Veterans Act provides priority service only to veterans or eligible spouses who meet the program’s eligibility requirements.

30.9. Adult Program and Dislocated Worker Program

In the WIOA Title I Adult program, the law requires that priority for individualized and training services be given to eligible veterans, public assistance recipients, low-income individuals and individuals who lack basic work skills.

To be served in the Dislocated Worker program, a participant must meet the eligibility criteria to qualify as a dislocated worker and then, if the participant is a veteran or eligible spouse, he or she must be given priority over dislocated workers who are non-veterans.

A basic dislocated worker eligibility requirement is that the worker is terminated or laid off. The Department of Labor has established policy that being discharged from the military under conditions other than dishonorable satisfies the termination requirement. The separating military personnel must also satisfy the other criteria for dislocated worker eligibility, including the requirements that the individual is eligible for or has exhausted unemployment compensation and is unlikely to return to a previous industry or occupation.

30.9.1. Military Spouses

A military spouse may be served as a dislocated worker if they have lost employment direct result of a relocation to accommodate a permanent change in duty station of the spouse. When the spouse is unable to continue an employment relationship because of the service member’s permanent change of military station, or the military spouse loses employment as a result of the spouse’s discharge from the military, then the cessation of employment can be considered to meet the termination requirement of the WIOA definition of dislocated worker.

Military spouses may also qualify if they are a dependent spouse of a member of the Armed Forces on active duty whose family income is significantly reduced, as determined by the State or local area, because

of a deployment, a call or order to active duty, a permanent change of station, or the service-connected death or disability of a service member. Military spouses also can qualify if they are unemployed or underemployed and are experiencing difficulty in obtaining or upgrading employment.

The military spouse also must satisfy the other criteria for dislocated worker eligibility, including the requirement that the spouse is eligible for or has exhausted unemployment compensation and is unlikely to return to a previous industry or occupation. In Iowa, military spouses impacted by a service member's duty reassignment or discharge may be eligible for unemployment and should be referred to Unemployment Insurance (UI). Under these circumstances, military spouses have been determined to be unlikely to return to a previous industry or occupation.

Surviving spouses of veterans and military service members may also be served with WIOA funds. If a surviving spouse qualifies as a dislocated worker or displaced homemaker, he or she could be served under the Dislocated Worker program. If a surviving spouse does not meet those requirements, he or she could be eligible to be served under the Adult program. In either program, a surviving spouse of a veteran as defined above may receive priority of service if he or she qualifies under the Jobs for Veterans Act.

30.10. Applicant and Participant Process

Once an individual has been determined eligible to receive Individualized Career Services or Training Services under either of the WIOA Title I Adult or Dislocated Worker programs, the creation of a hard copy file must be completed. Eligible participants can receive services according to the following guidelines.

30.10.1. Individualized Career Services and Training Services

All participants receiving Individualized Career Services or Training services must complete the Objective Assessment (OBA) process as well as develop an Individual Employment Plan (IEP).

Objective Assessment (OBA)

The objective assessment (OBA) process collects information upon which a participant's Individual Employment Plan (IEP) will be based. OBA is a mutual exchange of ideas and opinions, discussion and deliberation. For details regarding OBA, see Objective Assessment under Individualized Career Services Activities later in this section.

Development of an Individual Employment Plan (IEP)

The individual employment plan (IEP) is an individualized career service that is mutually developed by the participant and career planner. The plan is an ongoing strategy to identify a career goal, develop an action plan, document progress and outline an appropriate combination of services for the participant.

The IEP includes an emphasis on consumer choice including providing information on eligible providers of training services and career pathways to attain career objectives. The IEP is the basic instrument for career planners to document the appropriateness of the decisions made about the participant's career goals, combination of services for the participant, including referrals to other programs for specified activities.

The Individual Employment Plan (IEP) must address the following:

- **Mutual development:** Staff develops, and modifies, the IEP in partnership with the participant and appropriate partner agencies. When co-enrolled in multiple programs, the IEP should be developed in collaboration with career planners representing each program, as appropriate;
- **Customer focus:** The combination of services chosen with the participant must be consistent with the results of any objective assessments, responsive to the expressed goals of the participant, and must include periodic evaluation of planned goals and a record of accomplishments in consultation with the participant (Example: completion of a training activity, HiSED);
- **Type and duration of service:** Document the service, including length of individualized career services or training services, based upon:
 - Employment/career goal and/or in-demand occupational clusters;
 - Referrals to partner services for specified activities; and,
 - Schedules for individualized career services and related supportive services.

The career planner must ensure that decisions are participant-centered; that is, intended to enhance the employability of the participant. Participants must have an active role in the development of their IEP. A new assessment for a participant is not required if it's appropriate to use a recent (within one year) assessment for the participant from another education or training program.

Strategies must also be designed to ensure equal opportunity in that a participant may not be excluded from training or career options based on age, gender, race or disability status. In addition, all participants must be provided information regarding non-traditional employment opportunities.

Given the results of the OBA, the IEP must describe all activities and services that will enable the participant to achieve their career goals, whether such services are provided through WIOA Title I or other non-WIOA Title I sources. If the participant's needs cannot be completely provided by WIOA Title I services, every reasonable effort must be made to arrange for these needs through other partner and community resources.

The participant is to be informed that the goal of all WIOA Title I services is employment or reemployment. Training may only be conducted for occupations that lead to self-sufficiency and for which there is a demand in the area served. Both the training provider and the training program must be in compliance with the local service plan and be listed on the Eligible Training Provider List. The career planner and the participant must discuss the requirements of consumer choice. The participant must be provided access to the Eligible Training Provider List (ETPL), including performance measures, costs, etc., and engage in a meaningful conversation with the participant regarding approved providers who offer their preferred training.

Since the IEP is an on-going process, it must be reviewed and updated, based on the needs and situation of the participant. The IEP must be updated, at a minimum, annually. This review must include an evaluation of the participant's progress in meeting the goals and objectives of the IEP as well as the adequacy of the support services provided.

Both the participant and the career planner must sign the initial IEP. The IEP must be updated as activities are completed or added. A copy of the initial IEP and any subsequent revisions must be given to the participant and the original copy must be maintained in the participant case file.

Participant Progress

Participant progress must be evaluated in relation to the goals and achievement objectives that were determined during the objective assessment process and documented in the IEP.

The evaluation of participant progress includes, but is not limited to:

- Meaningful direct contact must be made with the participant regarding the progress that has been made toward the goals and achievement objectives;
 - Direct contact may either be in person, telephone, e-mail or regular mail or electronic means provided there is a meaningful conversation or interaction between staff and the participant documented in the case file.
- Discussion regarding current or changing circumstances that may be impacting their progress;
 - Documentation of steps taken to assist the participant in overcoming current barriers.
- Documentation and follow-up of referrals made to outside service providers;
- A performance evaluation from the training instructor or supervisor.

A summary of the participant progress review and outcomes must be documented in the IEP and case noted in the data management system. On-going documentation should occur every 30 days, but must occur every 90 days. Progress cannot be documented by only “Time and Attendance” documentation.

Participant progress reports must be completed in accordance with the progress report elements in the Records Keeping and Maintenance policy. Any performance evaluations or test scores must also be part of the participant file. Refer to Record Keeping and Maintenance for the required progress report elements.

Exit

Career planners should assess the progress of participants that are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. Upon completion of Individualized Career Services or Training Services, the individual will return to Basic Career Services until employment is secured. With the return to Basic Career Services, the following will be completed:

- Documentation of all Basic Career Services will be made in the data management system
- Documentation of employment, if known
- Initiation of ongoing documentation of activities / direct contact.

Exit from program services occurs on the last date a participant received WIOA Title I or partner services, excluding follow-up services. Participants are automatically exited in the data management system upon the

90th day after the last WIOA Title I or partner service is received if no further WIOA Title I or partner services are scheduled and the exit date becomes the last date of a countable service.

All activities must be closed for the exit to occur.

Future services may only be used to extend the 90 day exit if the gap in service is due to a delay before the beginning of training, or if a health/medical condition or institutionalization prevents an individual from participating in services. In this situation, career planners are required to document any gaps in services and to document the reason for the gap in service. Additional assistance on this topic is available in the Performance Reporting and Outcomes policy.

The following outlines circumstances for which it may be appropriate for an exit to occur prior than intended upon participant enrollment:

- Institutionalized;
- Health/Medical or family care (for conditions expected to last beyond 90 days and documented by a physician);
- Deceased;
- Reserve Forces Called to Active Duty – the participant is a member of the National Guard or a military Reserve unit and is called to active duty for at least 90 days;
- Determined Ineligible; or
- Invalid or missing Social Security Number. Will be addressed automatically by the system in the event the SSN cannot be matched to wages.

In the following participant circumstances, the career planner must close all activities and the participant will be exited automatically in 90 days unless the participant is receiving partner services:

- Upon final determination of ineligibility;
- Upon determination of fraud committed by the participant. Please see the Fraud section for information concerning determination of fraud;
- Upon failure to furnish verification documentation within a reasonable amount of time; and
- For failure to comply with Selective Service requirements (i.e., submitting and registering for the draft as required).

A participant's activities may also be ended for other reasons as established by the WIOA Title I A/DW Service Provider including the following:

- Upon recommendation of instructor, supervisor or WIOA Title I representative for disciplinary reasons or unsatisfactory progress;
- For health, family or transportation problems which prevent the continuation of scheduled activity; and
- If working for an employer, for any and all reasons that other regular (non-WIOA Title I) employees of the employer may be dismissed. In such cases, ending WIOA Title I activities is not mandatory or automatic. It is the responsibility of the WIOA Title I Service Provider to determine

whether the participant's activities should be ended or continue to be served in another WIOA Title I activity.

- After a minimum of 4 unsuccessful attempts to contact the participant over the course of 60 days. Staff will use at least 2 different contact methods: phone, email, social media, US mail, etc. and clearly document the attempts in the case management system.

Ineligibility

If a participant is determined to be ineligible at any time, the individual must be informed of the determination and given a reasonable time to respond. Upon final determination of ineligibility for a program, the participant's activities must be closed. This must occur the same day that the final determination of ineligibility is made. The reason for the ineligibility, the date of final determination of ineligibility and the date of discontinuation of services must be documented in the participant record.

Fraud

If at any time it is found that a participant has committed fraud to receive WIOA Title I assistance or has attempted to defraud the WIOA Title I program, the participant's activities must be immediately closed. All circumstances related to the fraudulent act or attempt to defraud, along with the last date of services, must be documented and maintained in the participant record. Please see the Fiscal Guidance Policy for procedures to be used for reporting fraudulent acts.

30.10.2. Follow-Up Services

The purpose of follow-up services is to identify any problems or needs that might preclude the participant from further developing employability skills, remaining employed or achieving career pathway goals.

Follow-up services will be provided to those individuals exited as employed. Local policies will further define how follow-up services will be provided.

Appropriate follow-up services must be made available to a participant placed in unsubsidized employment for a minimum of 12 months following the participant's first date of employment. Follow-up services can be useful for participants in order to maintain employment. One-stop staff can provide workplace information and tips for success in a workplace environment. Additionally, follow-up services provide a continuing link between the participant and workforce system; these services allow the one-stop to assist with other services the participant may need once he or she obtains employment. Examples may include opportunities to further career pathways, assistance with employer benefits, health insurance, and financial literacy and budgeting assistance.

30.4.5. Post-Exit Documentation

This process includes the collection of information on a participant's status after an individual has been exited from WIOA Title I services; refer to the to Record Keeping and Maintenance policy for more detailed information on record keeping. This is tracked from the exit date and begins the first and second quarter after the exit quarter. Wage and employment information is primarily obtained automatically from UI Wage Records and administrative records. Wage or administrative records may need to be collected through personal contact with the participant. Supplemental sources may be used if individuals are not found in UI Wage Records, provided that the information is documented and verified, and wages earned

are in compliance with state or federal law. IWD will verify the accuracy of a sample of supplemental information through the monitoring process.

Several reporting items cannot be obtained through UI Wage Records and will need to be obtained through post-exit contacts. These items are:

- Employment Information, including occupation, training-related employment and non-traditional employment;
- Attainment of a recognized educational/occupational certificate/credential/diploma or equivalent, or degree and the date of attainment;
- Entry into postsecondary education or advanced training and the date of entry. Also, whether or not the individual is still in postsecondary education or advanced training in the first through fourth quarter after exit; and
- Entry into post-secondary education advanced training, military service, qualified apprenticeship, un-subsidized employment and the date of entry.

30.11. Program Services and Activities

Documentation for all activities listed in this section must be detailed in the data management system and document all services from beginning to end. Many of the activities and services listed below contain policies relating to the maximum length or duration of the activities. These limitations are intended to be default policies. The Regional Workforce Development Board may increase or decrease the maximum length of an activity by specifying the regional policy in the Local Service Plan (LSP).

WIOA authorizes “career services” for adults and dislocated workers. There are three types of “career services”:

- Basic career services,
- Individualized career services, and
- Follow-up services.

30.11.1. Basic Career Services

All WIOA services can be provided in any order; there is no sequence requirement for these services. Career services under this approach provide local areas and service providers with flexibility to target services to the needs of the customer.

Guidance and Counseling (G&C)

The process of assisting a participant through a mutual exchange of ideas and opinions, discussion and deliberation. This activity can be done in a group or individualized setting which assists a participant in obtaining a focus to develop their talents and competencies for the world of work. This may include referrals for crisis intervention, domestic abuse counseling, drug and alcohol abuse counseling and mental health counseling offered by qualified professionals. Career planners must coordinate with the organization it refers the participant to in order to ensure continuity of services. G&C may also be academic or career-related guidance. Career guidance may include the provision of information, materials, and referrals to partner programs as needed. Guidance and counseling may include information or referrals related to

parenting skills, academic progress, offender transition, pregnancy, conflict management, or other appropriate community-based organization, etc.

G&C must be offered in combination with other WIOA or partner services. G&C is not to be used as an ongoing activity. G&C may be revisited if the participant experiences a major change in his or her personal life or wishes to change his or her IEP.

Case notes must identify the specific purpose of Guidance and Counseling. They must also document progress in achieving the specific planned outcome. Support services may be utilized as appropriate.

Job Search and Placement (JSP)

Job Search and Placement (JSP) occurs when the participant is provided one-on-one assistance with the development of their job search activities and career counseling when needed. Participants will be provided information on in-demand industry sectors and occupations, including information regarding nontraditional employment.

Examples of JSP activities are, but not limited to:

- Mock Interviewing
- Video Interviewing
- Informational Interviewing
- Career Fairs
- Employment Proposals
- Employer Contacts
- Job Referrals with follow-up

Documentation of a job search plan, resume assistance or employer contact is required and must be noted in the data management system. Sending participant's job referrals without further engagement is not appropriate under this activity.

30.11.2. Individualized Career Services

The following activities will be documented, as appropriate, on the Individual Employment Plan.

Objective Assessment (OBA)

The objective assessment (OBA) process collects information upon which a participant's Individual Employment Plan (IEP) will be based. OBA is a mutual exchange of ideas and opinions, discussion and deliberation. This process assists a participant in obtaining a focus to develop his or her talents and competencies for the world of work. The results of the objective assessment must be shared verbally with the participant and must be used to develop the IEP in partnership with the participant. Objective assessment may be completed using a combination of structured interviews, paper and pencil tests, performance tests, work samples, behavioral observations, interest and/or attitude inventories, career guidance instruments, aptitude tests and basic skills tests. OBA may be a process that requires more than one appointment with the participant and the Service Provider or partner conducting all or portions of the assessment.

Portions of assessments conducted by other one-stop center partners, such as WIOA Core Partners, PROMISE JOBS or other programs, such as, but not limited to: Vocational Rehabilitation, Adult Education, Job Corps, AmeriCorps, or YouthBuild may be used to collect information on the factors required for the objective assessment as described in this section. Partner assessments must have been completed within one year prior to WIOA Title I enrollment.

The objective assessment is a short-term activity that may be revisited as needed to determine further service strategies. The OBA should not be used as a stand-alone activity unless the participant's employment goals change. The OBA must be clearly documented in the data management system including the type of assessment used and the results of that assessment. Documentation of a mutual conversation between the career planner and participant of the results is also required. Local areas will identify which assessment tools will be utilized during the OBA process.

Objective assessment must be a participant-centered, objective evaluation of the service needs of each participant, academic levels and skill levels. The objective assessment may include a review of prior work experience basic skills, employability, occupational skills, work readiness skills, interests, aptitudes (including interests and aptitudes for nontraditional jobs), support service needs and developmental needs of participants for the purpose of identifying appropriate services and career pathways.

The assessment process must utilize generally accepted methodologies and instruments to collect information on each of the following factors for each participant:

- Family situation
- Work history
- Education
- Basic literacy skills
- Occupational skills
- Work readiness skills
- Interests and aptitudes
- Attitude and motivation
- Financial resources
- Basic needs
- Review of strengths

Consumer Choice

Additionally, career planners must provide guidance on consumer choice. Consumer choice is a process where the career planner and participant engage in mutual conversation regarding selecting the appropriate training program and training provider. The career planner must facilitate a discussion with the participant during the OBA process, and include the following:

- The training program selected should be directly linked to employment opportunities in the local region, or in another area in which the individual is willing to relocate, that are:
 - In high demand; or
 - Have a high potential for sustained demand; or

- Anticipating to growth in the local area.
- Career planners should provide guidance to ensure that the training provider and program selection is appropriate for the participant, which was identified through the Objective Assessment (OBA) process.
- Career planners should document conversations of maximized consumer choice within the data management system as a component of the OBA process.

Skill-Upgrading (SUG)

The purpose of Skill-Upgrading (SUG) is to provide short-term pre-vocational training to participants to upgrade their occupational skills and enhance their employability. Examples of allowable skill upgrading activities include: a typing refresher to increase speed and accuracy, keyboarding, basic computer literacy and ELL, or other non-industry specific training activities such as customer service or manufacturing training.

Skill-Upgrading may be conducted in a classroom setting or on an individual basis. SUG must be short-term in nature and must not exceed 26 weeks in duration, with the exception of ELL, and does not lead to a credential. Documentation including justification of activity, length, progress, and results must be noted in the data management system.

Financial Literacy (FIN)

Financial Literacy (FIN) provides a participant with the information needed to make informed judgments and effective decisions about the use and management of their money.

The FIN activity includes activities that provide age appropriate and relevant financial education. Offering access to safe and affordable financial products that enhance money management skills and complement other approaches is one way to support participants. Career planners can also help participants gain the knowledge, skills, and confidence needed to make informed, sustainable financial decisions. Timely and customized information, guidance, tools, and instruction should be accessible and readily available to participants. Programs are encouraged to engage participants through providing opportunities to put lessons into practice. Quality FIN activities should achieve the following:

- Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions.
- Support participants in learning, credit, debt, including student loans, consumer credit, and credit cards.
- Teach participants about the significance of credit reports and credit scores, what their rights are regarding their credit and financial information, how to determine the accuracy of a credit report and how to correct inaccuracies, and how to improve or maintain good credit.
- Support a participant's ability to understand, evaluate, and compare financial products, services, and opportunities to make informed financial decisions.
- Educate participants about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft, and in other ways understand their rights and protections related to personal identity and financial data.

- Support 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.

Pre-Employment Training (PET)

The purpose of Pre-Employment Training (PET) is to help participants to acquire skills necessary to obtain unsubsidized employment and to maintain employment. PET activities may include, but are not limited to:

- Instruction on how to maintain employment, including employer's expectations relating to punctuality, job attendance, dependability, professional conduct and interaction with other employees;
- Assistance in personal growth and development which may include motivation, self-esteem building, communication skills, basic living, personal maintenance skills, social planning, citizenship and life survival skills;
- Instruction in how to obtain jobs, including completing applications and resumes and learning interviewing skills; and
- Non-career specific skills enhancement as provided in a classroom setting.

Pre-Employment Training activities must include documentation of the following: a schedule for the participant to follow, regular contact by a staff person, a maximum length of time allowed in the activity and documentation that the participant and staff are making the required contacts and following the established schedule.

Staff-Assisted Job Development (SJD)

Staff-Assisted Job Development (SJD) is the act of contacting employers, who do not already have a job listed, to determine if the employer has an interest in interviewing and potentially hiring a specific participant who possesses skills required by that employer. This consists of working with a specific employer to actually develop a position/job for the participant. Documentation of communication with employer is required.

Internship (INT)

INT is an Individualized Career Service activity. See details regarding this activity under the Experiential Learning Activities.

Work Experience (WEP)

WEP is an Individualized Career Service activity. See details regarding this activity under the Experiential Learning Activities

30.4.6. Training Activities

Entry into training services requires an objective assessment (OBA), and the development of the Individual Employment Plan (IEP). Regional teams are encouraged to review before individual participant enters into training services. Local areas must first seek training programs that lead to recognized post-secondary credentials in in-demand industries or occupations. Training should be outcome-oriented and focus on the career pathway goal outlined in the participants IEP.

Training services may be available for individuals who, after interview, evaluation or assessment, and career planning are determined to be unlikely or unable to obtain or retain employment that leads to self-sufficiency or higher wages from previous employment through career services alone. The participant must be determined to be in need of training services and to possess the skills and qualifications to successfully participate in the selected program. Some participants may need additional services to assist their vocational training, such as job readiness training, literacy activities including English language training, and customized training.

A determination of need for training services must be documented as determined through the interview, evaluation or assessment, career planning and informed by local labor market information and consumer choice, or through any other career service received. There is no requirement that career services be provided as a condition to receipt of training services; however, if career services are not provided before training, the circumstances must be documented that justify the determination to provide training without first providing career services.

Training services are provided to equip individuals to enter the workforce and retain employment.

Individualized Career Services with a Training Component Related to Experiential Learning

With increased emphasis on Experiential Learning opportunities within WIOA Title I, for reporting purposes, the following activities have a training component in addition to work-based learning. These services are considered an individualized career service: OJT, incumbent worker training, pre-apprenticeship training, work-place training with related instruction, skill upgrading and retraining, and transitional jobs.

Registered Apprenticeship (APP)

Registered Apprenticeship (APP) is a proven approach for preparing youth participants for jobs while meeting the needs of employers. It is an employer-driven, “learn while you earn” model that combines on-the-job training, combined with job-related instruction in curricula tied to the attainment of national skills standards. Registered Apprenticeship is a flexible training strategy that can be customized to meet the needs of any business. Apprentices can be new hires, dislocated workers, youth or incumbent workers - anyone who needs skill upgrades.

While it is used in traditional industries such as construction and manufacturing, Registered Apprenticeship is also an excellent tool for use in training and development in growing industries such as health care, information technology, transportation and logistics, agriculture, hospitality and energy. There are five components to a typical Registered Apprenticeship Programs which include:

- **Business Involvement.** Employers are the foundation of every Registered Apprenticeship Program.
- **Structured On-the-Job Training.** Apprenticeships always include an on-the-job training (OJT) component. OJT focuses on the skills and knowledge an apprentice must learn during the program to be fully proficient on the job. This training is based on national industry standards, customized to the needs of a particular employer.
- **Related Instruction.** Apprenticeships combine on-the-job learning with related instruction on the technical and academic competencies that apply to the job. Education partners collaborate with

business to develop the curriculum, which often incorporates established national-level skill standards.

- **Rewards for Skill Gains.** Apprentices receive wages when they begin work, and receive pay increases as they meet benchmarks for skill attainment which serves to reward and motivate apprentices as they advance.
- **Nationally Recognized Credential.** Every graduate of a Registered Apprenticeship Program receives a nationally-recognized credential. This is a portable credential that signifies to employers that apprentices are fully qualified for the job.

Developing Registered Apprenticeship Programs for the following industries in Iowa is a state priority:

- Advanced Manufacturing
- HealthCare
- IT
- Hospitality
- Agriculture
- Construction

Placement into a Registered Apprenticeship (APP) provides for an effective means to record an apprenticeship training and employment activity.

When connecting and developing individuals for successful completion in a registered apprenticeship program, career plans must be developed and documented to support the participant's career pathway. Benchmark goals must also be recorded.

Successful completion for registered apprentices may be recorded at the point when an individual may be able to provide a self-sustainable wage in the event of premature departure from the apprenticeship.

All participant progress must be documented in the data management system.

Customized Training (CUS)

The purpose of Customized Training (CUS) is to provide training that is specific to an employer (or group of employers) specific requirements so that individuals will be hired by the employer after successful completion of the training.

Customized training is designed to provide local areas with flexibility to ensure that training meets the unique needs of the job seekers and employers or groups of employers.

Ensure the following when considering Customized Training for participants:

- Customized training is training normally provided in a classroom setting that is designed to meet the special requirements of an employer or group of employers;
- The employer(s) must commit to hire an individual upon successful completion of the training;
- The employer must pay a significant portion of the cost of the training (not less than 50 percent);
- Participants enrolled in CUS must be covered by adequate medical and accident insurance; and,

- Documentation of the CUS and participant progress must be noted in the data management system.

Entrepreneurial Training (ENT)

The purpose of Entrepreneurial Skills Training (ENT) is to provide participants the basics of starting and operating their own self-employment businesses or enterprises.

The methods of providing ENT may include payment for classes in small business development, marketing, accounting, financing or any other courses that could contribute to a participant's goal of self-employment. On-site observation and instruction in business skills may also be provided, as well as individualized instruction and mentoring.

- Entrepreneurial Training may not be used for training in job specific skills other than business management. However, it may be provided concurrently or consecutively with specific skill training in IST or OJT for the purpose of establishing an enterprise that utilizes those skills.
- Payments under ENT are limited to training programs and activities that provide instruction in business operation and management. Funds may not be used for any direct costs associated with the establishment or operation of the business (e.g. materials, inventory, overhead, advertising, etc.).
- All participants who are enrolled in ENT must apply for any financial assistance for which they may qualify, including Pell Grants. For purposes of this requirement, financial assistance does not include loans.
- Normally, an ENT would be completed with the start-up of the business. The exceptions would be if there were ongoing mentoring activities or a class/classes that need to be completed relating to management of the business.
- Documentation of the ENT and participant progress must be noted in the data management system.

Occupational Skills Training (IST)

The purpose of Occupational Skills Training (IST) is to provide individuals with the technical skills and information required to perform a specific job or group of jobs. IST is typically conducted in a classroom setting, but can also consist of online, ICN or self-study programs, etc. The emphasis on Occupational Skills Training (IST) requires local areas give priority consideration for training programs that lead to a recognized post-secondary credential that aligns with in-demand industries or occupations in the local area.

When seeking occupational skills training for a participant, career planners must guide participants to training programs that lead to self-sufficient employment through attainment of recognized post-secondary credentials in in-demand industries or occupations. Such training must be outcome-oriented and focused on an occupational goal in a participant's individual service strategy, and the training must be of sufficient duration to impart the skills needed to meet that occupational goal.

For all IST cases, local areas must ensure that the training program, at a minimum, adheres to the following guidelines:

- All participants who are enrolled in IST must apply for any financial assistance for which they may qualify. Financial aid or scholarships must be used to cover the education/training expenses prior to IST funds being expended.
- WIOA Title I A/DW funding may only be used to pay for tuition, books, fees and required materials for coursework as required.
- All participants who are enrolled in IST must be covered by the training institution's tuition refund policy. In the absence of a refund policy established by the training institution, the WIOA Title I A/DW Service Provider must negotiate a reasonable refund policy with the training site.
- Documentation of consumer choice in selecting both an approved training provider AND program must be noted in the data management system.

On-the-Job Training (OJT)

On-the-Job Training (OJT) allows the participant to train onsite at a place of employment, while he or she is doing the actual job. A professional trainer or experienced employee serves as the course instructor using hands-on training often supported by formal classroom training.

OJT is a training activity. See Experiential Learning Activities for additional details regarding this activity.

Remedial and Basic Skill Training (RBS)

RBS activities may be offered as remedial basic skills training services only, and may be offered as a stand-alone service or in combination with other allowable services. The purpose of RBS is to enhance the employability of participants by upgrading basic literacy skills through basic and remedial education courses, literacy training, English language acquisition training and Adult Education and Literacy and in consideration of the following guidelines:

- Remedial and Basic Skill Training may be conducted in a classroom setting or on an individual basis.
- RBS may be used to improve academic or language skills prior to enrollment in other training activities such as IST.
- Remedial and basic skills training may include; tutoring, study skills training, and other remedial and basic skills activities.
- RBS must be offered in combination with other allowable training services to include: Occupational Skills (IST), On-the-Job Training (OJT), Entrepreneurial (ENT), Secondary Education Certification (SEC), and Registered Apprenticeship (APP). This excludes Customized Training (CUS).

Remedial and Basic Skill Training activities must include a documented schedule for the participant to follow, regular contact by a career planner, an established timeline for completion and documentation of progress towards completion of the goal.

Secondary Education Certification (SEC)

The purpose of SEC is to enhance the employability of participants by upgrading their level of education.

Secondary Education Certification activities may be conducted in a classroom setting or on an individual basis. SEC must be categorized as:

- Secondary school;
- Alternative school; or
- Individualized study.

Participation in this component must be expected to result in a high school diploma, high school equivalency certificate or an Individualized Educational Program (IEP) diploma.

SEC activities must include a documented schedule for the participant to follow, regular contact by a career planner, an established timeline for completion and documentation of progress toward completion of the goal.

Incumbent Worker Training (IWT)

Incumbent worker training is designed to ensure that employees of a company are able to gain the skills necessary to retain employment and advance within the company or to provide the skills necessary to avert a layoff and must increase both a participant's and a company's competitiveness.

Incumbent workers are currently-employed workers whose employers have determined that the worker requires training to increase the competitiveness of the employee or the employer. The worker must have an established employment history with the employer for 6 or more months. Such training will upgrade workers' skills, increase wages earned by employees and/or keep workers skills competitive. There is one exception to the six month requirement, which is that in the event that incumbent worker training is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six months or more as long as a majority of those employees being trained meet the employment history requirement.

- Local areas may use up to 20 percent of their local adult and dislocated worker funds for incumbent worker training.
- The training should, wherever possible, allow the participant to gain industry-recognized training experience, and ultimately should lead to an increase in wages. An incumbent worker is employed with the company when the incumbent worker training starts. Contract funds are paid to the employer for training provided to the incumbent worker either to avert a lay-off or otherwise retain employment. An ideal incumbent worker training would be one where a participant acquires new skills allowing him or her to move into a higher skilled and higher paid job within the company, thus allowing the company to hire a job seeker to backfill the incumbent worker's position.
- The employer or group of employers must pay for a portion of the cost of providing the training to incumbent workers.
- Statewide activities funds or Rapid Response funds may be available for statewide incumbent worker training activities.

Determining Incumbent Worker Training Funding

When determining use of funding for incumbent worker training with a particular employer, local service providers must identify and document participant characteristics, the relationship of the training to the

competitiveness of the participant and employer, and other factors that the Local Board determines appropriate.

Additional factors for determining use of funding for incumbent worker training may include:

- The number of employees in training;
- Wages and benefits (including post-training increases);
- The existence of other training opportunities provided by the employer;
- Credentials and skills gained as a result of the training;
- Layoffs averted as a result of the training;
- Utilization as part of a larger sector and/or career pathway strategy; or
- Employer size.

There are cost sharing requirements for employers participating in incumbent worker training to pay for the nonfederal share of the cost of providing training to incumbent workers of the employers.

The non-federal share shall not be less than:

- 10 percent of the cost, for employers with not more than 50 employees;
- 25 percent of the cost, for employers with more than 50 employees but not more than 100 employees; or
- 50 percent of the cost, for employers with more than 100 employees.

The non-federal share provided by an employer participating in the program may include the amount of the wages paid by the employer to a worker while the worker is attending an incumbent worker training program. The employer share may be in cash or in kind.

An incumbent worker does not have to meet the eligibility requirements for career and training services for adults and dislocated workers under WIOA, unless they are also enrolled as a participant in the WIOA adult or dislocated worker program.

IWT can also be used for underemployed workers—e.g. workers who would prefer full-time work but are working part-time for economic reasons. While these workers are employed, they may have accepted reduced hours to gain or maintain employment or a previous dislocation has led them to accept reduced employment and often lower wages that may have a permanent effect on their careers.

30.4.7. Experiential Learning Activities

Experiential learning activities include: Work Experience (WEP), Pre-Apprenticeship (PRE), Internships (INT), Job Shadowing (SHW), Transitional Jobs (TJB) and On-the-Job Training (OJT). Of these experiential learning activities, OJT is considered a training activity. These activities are designed to enable an individual to gain exposure to the world of work and its requirements by helping them acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. These opportunities provide the participant with opportunities for career exploration and skill development and must include academic and occupational education.

Experiential learning activities are a planned, structured learning experience that takes place in a workplace for a limited period of time, which may be paid or unpaid, as appropriate. Placements may be made in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any experiential learning activity where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists.

Documentation including location, wage, duration, progress and results must be noted in the data management system.

Work Experience (WEP)

The Work Experience (WEP) activity should be used for individuals who have limited work experience or have been out of the labor force for an extended period of time including, but not limited to, students, school dropouts and individuals with disabilities.

Work Experience must be limited to persons who need assistance to become accustomed to basic work requirements, including basic work skills, in order to successfully compete in the labor market.

Work Experience may be used to provide:

- Instructions concerning work habits and employer and employee relationships in a work environment
- An improved work history and work references
- An opportunity to actively participate in a specific work field
- An opportunity to progressively master more complex tasks

Work experiences may be paid or unpaid; however it is strongly encouraged that organizations pay individuals for work performed.

Staff should use the following guidelines when considering work experiences for participants:

Wages, Insurance and Benefits

- If the WEP participant is paid wages, the wages must be no less than the higher of the federal or State Minimum Wage. (In most WEP situations, the WIOA Title I Service Provider is the employer of record.) WEP participants must always be paid for time worked and must not be paid for any scheduled hours they failed to attend without good cause.
- Each participant in WEP must be covered either by Workers' Compensation in accordance with State law or by adequate on-site medical and accident insurance.
- Participants in WEP are exempt from unemployment compensation insurance. Therefore, unemployment compensation costs are not allowable.
- Under certain conditions participants in a wage paying WEP may be paid for time spent attending other activities. Such payments may only be made if WEP participation is scheduled for more than fifty percent (50%) of the scheduled training time in all activities. Usually, the participant will be enrolled simultaneously in both the WEP activity and the other activity.
- If the work experience is paid, in addition to the guidelines listed here, other State and federal regulations governing employment situations apply to WEP as well.

WEP Worksite Eligibility

- Work Experience may take place in the private sector, for-profit sector, non-profit sector, or public sector. A participant cannot be placed in a WEP with an employer where the participant is already employed in an unsubsidized position.
- Work Experience must not be used as a substitute for Public Service Employment (community service) activities as a result of court-adjudication.

WEP Length of Training

A WEP agreement at one worksite can be written for a maximum of 13 calendar weeks unless the agreement is for a part-time WEP of less than 520 hours, then WEP activity period can be extended to a maximum of 26 weeks.

Pre-Apprenticeship (PRE)

Pre-apprenticeship programs are workforce development programs that prepare people, particularly low-income individuals and non-traditional construction workers such as women and minorities, to enter the construction trades.

A Pre-Apprenticeship program must incorporate the following elements outlined below:

Approved Training and Curriculum

Training and curriculum is based on industry standards and approved by the documented Registered Apprenticeship partner(s) that will prepare individuals with the skills and competencies needed to enter one or more Registered Apprenticeship program(s) and that aligns with the skill needs of employers.

Strategies for Long-Term Success

Strategies that increase Registered Apprenticeship opportunities for under-represented, disadvantaged or low-skilled individuals, such that, upon completion, they will meet the entry requirements, gain consideration, and are prepared for success in one or more Registered Apprenticeship programs.

Examples of successful long-term strategies include the following:

- Implementation of strong Recruitment Strategies focused on outreach to populations under-represented in local, state, and national Registered Apprenticeship programs;
- Development of strong educational and pre-vocational services that prepare individuals to meet the entry requisites of one or more Registered Apprenticeship programs (e.g. specific career and industry awareness workshops, job readiness courses, English for speakers of other languages, Adult Basic Education, financial literacy seminars, math tutoring, etc.);
- Real opportunities to attain at least one industry-recognized credential; and
- Exposure to local, state and national Registered Apprenticeship programs and provision of direct assistance to participants applying to those programs;
- Access to Appropriate Support Services in order to facilitate access to appropriate support services during the pre-apprenticeship program and a significant portion of the Registered Apprenticeship program;

- Promotion of greater use of Registered Apprenticeships to increase future opportunities that support the ongoing sustainability of the partnership between pre-apprenticeship providers and Registered Apprenticeship sponsors – these efforts should collaboratively promote the use of Registered Apprenticeship as a preferred means for employers to develop a skilled workforce and to create career opportunities for individuals;
- Meaningful Hands-on Training that does not Displace Paid Employees in a simulated lab experience or through volunteer opportunities, when possible, neither of which supplants a paid employee but accurately simulates the industry and occupational conditions of the partnering Registered Apprenticeship sponsor(s) while observing proper supervision and safety protocols; and
- Facilitated Entry and/or Articulation of formalized agreements with Registered Apprenticeship sponsors that enable individuals who have successfully completed the pre-apprenticeship program to enter directly into a Registered Apprenticeship program and/or include articulation agreements for earning advanced credit/placement for skills and competencies already acquired.

Registered apprenticeships may contribute to the success of apprenticeship participants by collaborating with pre-apprenticeship programs by:

- Collaborating on assessment, curriculum and preparatory training,
- Helping to set quality standards,
- Helping to establish competency models and training goals,
- Considering direct entry and advance placement agreements and
- Developing memoranda of understanding.

Pre-apprenticeship activities may include, but are not limited to:

- Auto-Detailing, Auto Body Repair
- Bricklaying
- Cabinetry and Installation
- Computer Repair
- Carpentry
- Concrete
- Construction Skills
- Electrical
- Electronics
- Engineering Studies
- Ethics Course in a Relevant Field
- Furniture Making and Finishing
- General Plumbing
- HVAC Systems
- Machining
- Mechanical
- OSHA Safety Standards Training in Key Areas
- Roofing Installation and Repair
- Vehicle Maintenance or Servicing

Internships (INT)

The purpose of Internship (INT) is to provide a participant with exposure to work and the requirements for successful job retention that are needed to enhance the long-term employability of that participant. Internships are limited in duration, devoted to skill development and enhanced by significant employer investment.

INT Wages and Benefits

- Participants in INT may be compensated for time spent in the INT activity.
- If the INT participant receives wages, the WIOA Title I Service Provider is the employer of record. The wages paid to the INT participant must be at the same rates as similarly situated employees or trainees of the employer of record, but in no event less than the higher of the federal or state minimum wage.
- INT participants receiving wages must always be paid for time worked, must not be paid for any scheduled hours they failed to attend without good cause, and must, at a minimum, be covered by Workers' Compensation in accordance with state law. In addition, all individuals participating in an INT activity who are paid wages must be provided working conditions at the same level and to the same extent as other employees of the employer of record working a similar length of time and doing the same type of work.
- INT participants, who are not receiving wages, must be covered by adequate on-site medical and accident insurance.

INT Worksite Eligibility

- INT may be conducted at public, private, for-profit and non-profit worksites.
- The use of INT must involve a substantial investment of effort by employers accepting the interning participants and must not be used in a manner that subsidizes or appears to subsidize private sector employers.

INT Length of Training

- The total participation in the INT activity for any participant must not exceed 500 hours per enrollment.
- Internship agreements must be written only for positions for which a participant would not normally be hired because of lack of experience or other barriers to employment.
- The Internship activity may be used in conjunction with OJT with the same employer. However, when this occurs, INT must precede the On-the-Job Training and the OJT training time for the participant must be reduced in accordance with the OJT policies in this section.
- If the worksite employer hires the participant during INT participation, the INT activity for that participant must be ended.

Job Shadowing (SHW)

The purpose of Job Shadowing (SHW) is to expose participants to jobs available in the private or public sector through job shadowing, instruction and, if appropriate, limited practical experience at actual worksites. Job Shadowing may take place at public, private non-profit or private-for-profit work sites.

SHW Wages and Benefits

The participant must not receive wages for the time spent in SHW. The participant is not necessarily entitled to a job at the end of the Job Shadow period.

SHW Worksite Eligibility

The business that hosts the SHW must derive no immediate advantage from the activities of the participant and on occasion the operation of the business may actually be impeded. In the case of private-for-profit organizations, the participant must not be involved in any activity that contributes, or could be expected to contribute, to additional sales or profits or otherwise result in subsidization of wages for the organization.

SHW Length of Training

- The total participation in the SHW activity for any participant in any one occupation must not exceed 160 hours per enrollment.
- The length of a participant's enrollment in SHW is limited to a maximum of 640 hours, regardless of the number of SHWs conducted for the participant.
- Job Shadow activities must include a schedule for the participant to follow, regular contact by a staff person, a maximum length of time allowed in the activity and documentation that the participant and staff are making the required contacts and following the established schedule.
- Participants enrolled in a Job Shadow activity must be covered by adequate on-site medical and accident insurance.

On-the-Job Training (OJT)

The purpose of On-the-Job Training (OJT) is to train a participant in an actual work situation that has career-advancement potential in order to develop specific occupational skills or obtain specialized skills required by an individual employer that the participant does not already possess

OJT Wages and Benefits

- Since OJT is employment, state and federal regulations governing employment situations apply to OJT. Participants in an OJT must be compensated at the same rates, including periodic increases as trainees or employees who are similarly situated in similar occupations by the same employer. Wages paid must not be less than the highest of federal or state minimum wage or the prevailing rates of pay for individuals employed in similar occupations by the same employer.
- Participants in an OJT must be provided benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of job.
- Each participant in an OJT must be covered by Worker's Compensation in accordance with State law.

OJT Employer Eligibility

- OJTs may not be written with temporary staffing agencies or employee-leasing firms for positions that will be "hired out" to other employers for probationary seasonal, temporary or intermittent employment. The only instance in which a temporary staffing agency may serve as the employer of

record is when the OJT position is with the staffing agency itself and not a position that will be "hired out."

- In situations where an employer refers an individual to the WIOA Title I A/DW program for eligibility determination with the intent of hiring that individual under an OJT contract, the individual referred to the WIOA Title I A/DW program may be enrolled in an OJT with the referring employer only when the referring employer has not already hired the individual and an objective assessment and the IEP or ISS have been completed which support the development of an OJT with the referring employer.
- Prior to re-contracting with an OJT employer, the past performance of that employer must be reviewed. An OJT contract must not be entered into with an employer who has previously exhibited a pattern of failing to provide OJT participants with continued long-term employment as regular employees with wages, benefits and working conditions at the same level and to the same extent as similarly situated employees. OJT participants that voluntarily quit, are terminated for cause, or are released due to unforeseeable changes in business conditions need not result in termination of employer eligibility for future OJT contracts.
- An employer that has been excluded from OJT contracting because of the requirement described above may again be considered for an OJT placement one year after that sanction was imposed. In this re-contracting situation, if the employer fails to retain the participant after the OJT ends, and there is no apparent cause for dismissing the employee, the employer must not receive any future OJT contracts.

OJT Payment and Training Length

- Payment by WIOA to employers is compensation for the extraordinary costs of training participants, including costs of classroom training and compensation for costs associated with the lower productivity of such participants.
- A trainer must be available at the employment site to provide training under an OJT contract. For example, a truck driving position where the driver drives alone or without immediate supervision or training would not be appropriate for OJT.
- The appropriate payment by WIOA is 50 percent of the wages paid by the employer to the participant during the period of the training agreement. In limited circumstances, the reimbursement may be up to 75 percent of the wage rate of the participant when the following conditions are considered:
 - The characteristics of the participants taking into consideration whether they are individuals with barriers to employment, length of unemployment and current skill level
 - The size of the employer, with an emphasis on small and medium sized businesses
 - The quality of employer-provided training and advancement opportunities, for example of the OJT contract is for an in-demand occupation and will lead to an industry recognized credential; and
 - Any additional factors the local board determines to be appropriate, which may include, the number of employees participating in the training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), and relation of the training to the

competitiveness of a participant. The factors used to decide an increase of wage reimbursement above 50 percent must be documented within the training plan.

- Wages are considered to be monies paid by the employer to the participant. Wages do not include tips, commissions, piece-rate based earnings or non-wage employer fringe benefits.
- Payment for overtime hours and holidays is only allowable in accordance with local policies. Holidays may be used as the basis for OJT payments only if the participant actually works and receives training on the holiday.

OJT Contracts

An OJT contract with an employer can be written for a maximum of 1,040 hours.

Under no circumstances can an OJT contract be written for a participant if the hours of training required for the position in which the participant is to be trained is determined to be less than 160 hours.

The number of OJT training hours for a participant must be determined using the following standardized chart, unless the Local Service Plan contains an alternative methodology for determining the length of OJTs. The hours specified must be considered as a departure point for determining actual WIOA training hours. If the total number of training hours for the OJT position cannot be provided during the maximum contract length allowable, as many training hours as possible must be provided.

Table 2: Scaled Value of Proficiency (O*NET)

| SVP* Level | Hours |
|------------|-------|
| 1 | 80 |
| 2 | 160 |
| 3 | 520 |
| 4 | 1,040 |
| 5 | 2,080 |
| 6+ | 4,160 |

OJTs are designed to be limited in duration as appropriate to the occupation for which the participant is in training, taking into account the content of the training, prior work experience of the participant, and the service strategy of the participant. The OJT training hours for a participant must be reduced if a participant has prior-related employment or training in the same or similar occupation. Previous training or experience, which occurred so long ago that skills gained from that experience are obsolete, may be disregarded to the extent that those skills need to be relearned or reacquired.

The number of training hours for a participant may be increased based upon the individual circumstances of the participant, such as disability. Local plans will need to identify the circumstances for reduction/increase of length of an on-the-job training.

The number of hours of training for any participant, as well as the process for extending or reducing those training hours from the basic method of determination must be documented in the participant's IEP or ISS.

OJTs for Employed Workers

- OJTs may be written for employed workers when the following additional criteria are met:
 - The employee is not earning a self-sufficiency wage as defined in the Local Service Plan; and
 - The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy or other appropriate purposes identified in the Local Service Plan.
- Documentation of the appropriateness including the assessment (participant and employer/business), contract, training plan, progress, skill evaluation, invoices and other financial records, etc. must be noted in the data management system.

Transitional Jobs (TJB)

The Transitional Jobs (TJB) activity is used for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history. The goal of transitional jobs is to establish a work history for the individual that demonstrates success in the workplace, and develops the skills that lead to entry into and retention in unsubsidized employment. Transitional Jobs provides comprehensive employment and supportive services to participants. Transitional jobs must be combined with career and supportive services.

Transitional Jobs may be used to assist individuals to:

- Learn the expectations of the workplace
- Address barriers to work
- Establish a work history and references
- Demonstrate success in a work environment
- Develop skills and experience that lead to entry into and retention in unsubsidized employment
- Create linkages to further education and training opportunities

Transitional Jobs Wages and Benefits

- The TJB participant must be paid wages no less than the higher of the federal or state minimum wage. (In most TJB situations, the WIOA Title I Service Provider is the employer of record.) TJB participants must always be paid for time worked and must not be paid for any scheduled hours they failed to attend without good cause.
- Each participant in TJB must be covered either by Workers' Compensation in accordance with State law or by adequate on-site medical and accident insurance.
- Participants in TJB are exempt from unemployment compensation insurance. Therefore, unemployment compensation costs are not allowable.
- In addition to the guidelines listed here, other State and federal regulations governing employment situations apply to TJB as well.
- Local boards may use up to 10 percent of their adult and dislocated worker funds to provide transitional jobs to individuals.

TJB Worksite Eligibility

- Transitional jobs are time-limited work experiences that are subsidized and may take place in the private sector, non-profit sector, or public sector. A participant cannot be placed in a TJB with an employer where the participant is already employed in an unsubsidized position.
- Unlike OJT, there is no assumption that the individual will be retained in their transitional job after the experience is over, though that would be a successful experience and outcome.

TJB Length of Training

- A TJB agreement at one worksite can be written for a maximum of 13 calendar weeks unless the agreement is for a part-time TJB of less than 520 hours, then TJB activity period can be extended to a maximum of 26 weeks.
- The number of training hours for a participant may be increased based upon the individual circumstances of the participant, such as disability. Local plans will need to identify the circumstances for increasing the length of a Transitional Jobs activity.
- If local areas choose to use transitional jobs as part of their service delivery strategy, they should adopt policies and identify employers (public, private or nonprofit) or creative options as ladders to registered apprenticeships, that can provide quality experiences for individuals to eventually obtain unsubsidized employment. Additionally, these policies should include plans on the amount reimbursements would be for the jobs, what supportive services should be included, and any limits on the duration of the transitional job.

30.12. Support Services

Support service payments may be provided, when necessary, to enable a participant to participate in a WIOA Title I activity or a partner activity. Follow-up services are not a qualifying service for the receipt of supportive services; therefore, an individual who is only receiving follow-up services may not receive supportive services. Individuals identified as needing ongoing supportive services must still be participating in career services (other than follow-up), training activities, or both to continue to receive supportive services.

- Support service payments can be made only when the participant is unable to obtain the service through other programs providing such services.
- The criteria, procedure or formula described in the Local Service Plan (LSP) is used to determine the eligibility for, and the amount of, support service payments for each individual participant.
- This criteria, procedure or formula must be applied to all participants in any program or activity for which support service payments are provided.
- The LSP must specify any limits, payment rates, maximum amount of payments and maximum length of time for support services to be available to participants.
- The need for and the amount of support service payments must be documented in the data management system and hard copy justification of support placed in the participants file.
- Support service payments must not be made for activities in which the participant failed to participate, without good cause.

Allowable support service payments can be made based on the following guidelines, and in adherence with any locally developed policy.

Support Services are available to members receiving individualized career services or training services, but only as determined necessary and documented in case notes that the participant required such support to participate and complete the activity.

30.4.8. Clothing (CHG)

The cost of items such as clothes and shoes that are necessary for participation in WIOA Title I activities such as interviewing, employment, or work experiences. Items such as uniforms and protective gear are generally allowable.

30.4.9. Counseling (CLG)

The costs of personal counseling services that will enhance a participant's employability are allowable. This may include employment, financial, individual, family and drug and alcohol abuse counseling.

Major personal or emotional problems affecting employability may require referral to an adequate outside counseling or health care agency.

30.4.10. Dependent Care (DPC)

The cost of dependent care from licensed daycare providers or from private sources agreed upon by the participant and WIOA Title I Service Provider, are allowable.

Dependent care includes child or adult care for which the participant would normally be responsible.

30.4.11. Financial Assistance (FAS)

The purpose of a financial assistance payment is to make a payment to a Service Provider or vendor on behalf of a participant to cover an emergency financial need that, if unmet, would prevent the participant from participating in WIOA Title I activities.

FAS may be used for such things as:

- Housing Assistance
- Auto Repair
- Eyewear Repair
- Other Critical Participant Needs

FAS may not be used to pay any type of fines or penalties imposed because of failure to comply with any federal, State, local law or statute.

30.4.12. Health Care (HLC)

Health care assistance could be made available to participants when lack of assistance will affect their ability to obtain or maintain employment.

This support service would be used as a last resort, and only when no other resources are available to the participant.

30.4.13. Miscellaneous Services (MSS)

Bonding and legal aid services are an allowable cost unless funds are available from other resources. If bonding is an occupational requirement, it should be verified that the participant is bondable before the participant is placed in training for that occupation.

The cost of required tools is allowed.

All policies and procedures set forth in the Iowa Title I Fiscal Administration policy section and should be applied to property purchased with WIOA Title I funds. The cost of licenses or application fees is allowable if required for employment.

Miscellaneous Services must be defined in the Local Service Plan.

30.4.14. Needs-Related Payments (NRP)

Needs-Related Payments are financial assistance payments made directly to participants to provide for the purpose of enabling them to participate in training activities. Only Adults and Dislocated Workers are eligible to receive Needs-Related Payments.

Adult Eligibility

To be eligible to receive NRP, adults must:

- Be unemployed; and
- Not qualify for, or have ceased qualifying for unemployment compensation; and
- Be enrolled (applied and accepted) in training services under WIOA Title I.

Dislocated Worker Eligibility

To be eligible to receive NRP, a dislocated worker must be unemployed and:

- Have ceased to qualify for unemployment compensation or trade readjustment assistance under TAA;
- Be enrolled in a program of training services under WIOA Title I, payments may be provided if the participant has been accepted into a program that will begin within 30 calendar days; and
- Be unemployed and not qualify for unemployment compensation or trade readjustment assistance under TAA.

Level of Needs-Related Payments

The level of Needs-Related Payments for adults and dislocated workers must be identified in the Local Service Plan. The level of payments for adults could be different than the level of payments for dislocated workers.

Adult

The Regional Workforce Development Board (RWDB) may establish a reasonable level of payments for adults.

Dislocated Worker

The RWDB must establish a level of payments for dislocated workers that do not exceed the greater of either of the following levels:

- For dislocated workers who were eligible for unemployment compensation as a result of a qualifying dislocation, the payment must not exceed the applicable weekly level of the unemployment compensation benefit; or
- For dislocated workers who did not qualify for unemployment compensation as a result of the qualifying layoff, the weekly payment level must not exceed the poverty level for an equivalent period. The weekly payment level must be reduced for total family income. The RWDB must determine the methodology for reducing the level of payment because of other family income. At least quarterly, the amount of family income must be reviewed to determine if adjustments must be made in the amount of NRP payments.

30.4.15. Residential/Meals Support (RMS)

Residential/Meals Support (RMS) is an allowable cost and includes the cost of lodging for each night away from the participant's permanent home required for continued program participation.

The cost for meals while the participant is away from home or in travel status for required training is allowable.

This support service is not intended to cover living expenses for long term activities, such as dormitory expenses while in training.

30.4.16. Services for Individuals with Disabilities (SID)

The cost of special services, supplies, equipment and tools necessary to enable a participant with a disability to participate in training is allowable.

It is not an allowable use of WIOA Title I funds to make capital improvements to a training or work site for general compliance with the Americans with Disabilities Act requirements.

30.4.17. Supported Employment and Training (SET)

Supported Employment and Training payments are allowable to provide individuals requiring individualized assistance with the one-on-one instruction and with the support necessary to enable them to complete occupational skill training and to obtain and retain competitive employment.

SET may only be used in training situations that are designed to prepare the participant for continuing non-supported competitive employment.

SET may be conducted in conjunction with Experiential Learning activities such as: INT, OJT, SHW, PRE and WEP.

An example of SET use would be the hiring of a job coach to assist an individual who has been placed in competitive employment.

Employment positions supported at sheltered workshops or similar situations may not utilize SET.

30.4.18. Transportation (TRN)

The cost of transportation necessary to participate in WIOA Title I activities and services, including job interviews, is allowable.