

SAN DIEGO WORKFORCE PARTNERSHIP, INC.
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INFORMATIONAL ISSUANCE

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DATE: May 11, 2012

TO: WIA Funded Youth Service Providers

FROM: Margie de Ruyter
Senior Director of Workforce Initiatives

SUBJECT: REQUIREMENTS FOR YOUTH PROGRAM SERVICE PROVIDERS

PURPOSE

The purpose of this informational issuance is to remind WIA funded Youth Service Providers of specific documentation requirements found to be frequently overlooked in a recent monitoring finding by the Employment Development Department (EDD) Compliance Review Office (CRO).

BACKGROUND

In April of 2011, EDD CRO conducted a review of participant files at Contracted Service Providers sites. The Draft Report findings from that monitoring were finally received in March 2012. There were several areas of San Diego Workforce Partnership (Workforce Partnership) Youth Program policies and procedures where Contracted Service Providers were found to be out of compliance. In order to ensure that the findings are corrected and not repeated, the Workforce Partnership is reminding Contracted Service Providers to review all youth policies and procedures to ensure that your staff is following the guidelines, using the correct forms, and generally implementing all the requirements. The areas listed below were specifically mentioned.

- 1) Selective Service Registration: Per Chapter IV, Part II, Youth Program Activities, (Chapter IV, Part II) §4.22 of the San Diego Workforce Partnership Operations Manual, all providers are reminded that male participants must be registered with Selective Service at time of enrollment or no later than 30 days after their 18th birthday. A copy of the Selective Service registration must be retained in the participant file. Youth Providers must implement a system to trigger follow-up regarding Selective Service Registration for any male youth who enters the program before his 18th birthday and who remains enrolled after turning 18.

2) Youth Incentive Policy Per Chapter IV, Part II, §4.17, all providers are reminded that they must submit for approval *and adhere to* a written policy for providing performance based incentives to program participants. Contracted Service Providers must ensure that their programs are in compliance with the following procedures:

- Incentives should be reflected in the contract budget
- Justification for receiving an incentive shall be documented in the youth's ISS
- Each participant shall be paid only after successful achievement of a milestone
- Cash incentives must be issued in the form of a check
- There must be a method in place for the participant to acknowledge receipt of incentive payments. This acknowledgment should be kept in the participant's file. Records of incentive payments provided to participants must be maintained in accordance with record retention requirements so that the Workforce Partnership is able to verify accuracy, timeliness, and record keeping by service providers.
- Duties of staff dispersing incentive payments must be separated so that no one individual has complete authority or control over a financial transaction.
- Participant records (ISS and case notes) and youth service provider financial records pertaining to cash incentive payments must be made available for review by local, state, and federal monitors and must meet financial management standards.

3) Individual Service Strategy Per Chapter IV, Part II, §4.14, the ISS is an integral part of providing services to participants in WIA funded programs. The ISS should be developed using a "youth centered" approach meaning the youth and their case manager complete the ISS together, in partnership. Contracted service providers should help each youth set personal, academic and career goals using assessment information gathered through observational interviewing techniques, as well as other assessment tools and instruments. The ISS document is used to determine and agree upon the specific services and activities that will be offered to a participant to assist him or her in meeting their individual goals.

The ISS should be developed *within the first 30 days of enrollment* in the program. The ISS must be jointly developed between the participant and the case manager. *Both the participant and case manager must sign a copy of the ISS.* A copy of the ISS must be kept in the individual participant file. All participants must be provided a copy of their ISS.

Since participant's needs and goals may change during their participation in the program, the ISS should be regularly reviewed and updated. Case notes should be used to support any changes and/or provide supplemental information related to the ISS process. The participant and their case manager must review the ISS every 3-6 months as dictated by the participant's progress toward their goals. Changes to the ISS must be documented in the Workforce Partnership's electronic case management system. A new ISS may be drafted as needed.

If you have any questions about this issuance, please contact your program specialist at (619) 228-2900)

Attachments

None

cc: Workforce Partnership Internal Distribution List
One-Stop Career Center Operators
Adult Program Service Providers
Mayer Hoffman McCann, P.C.