



**OPERATIONS MANUAL  
CHAPTER 4, PART 2 YOUTH: PROGRAM  
ACTIVITIES**

**REVISED JULY 2016**

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# Chapter 4, Part 2 Youth: Program Activities

## Sec. 1. Introduction

The San Diego Workforce Partnership (SDWP) Operations Manual (Manual) provides detailed requirements, instructions and guidelines for contracted subrecipients and partners managing SDWP workforce development programs. This section is intended for Youth Service Providers (YSP) and staff members to meet contract standards and comply with the requirements set forth by SDWP, the State Employment Development Department (EDD), the U.S. Department of Labor (DOL) and all applicable laws and requirements.

## Sec. 2. Background

On July 22, 2014, President Obama signed the Workforce Innovation and Opportunity Act (WIOA) into law, which supersedes the Workforce Investment Act (WIA) of 1998. Key changes under WIOA for serving youth include increasing the minimum percentage of funds to be spent on Out-of-School (OSY) from 30% to at least 75%, an increased focus on work-based learning and career pathways, extending the out-of-school age limit from 21 to 24 years, and streamlining the eligibility process.

The DOL is committed to providing high quality services for disconnected youth and young adults; beginning with career exploration and guidance, continued support for educational attainment, opportunities for skills training in in-demand industries, occupations apprenticeships and culminating with a good job along a career pathway, enrollment in post-secondary education, or a Registered Apprenticeship.

The Notice of Proposed Rulemaking (NPRM), a public notice that changes regulations for WIOA can be located at <http://www.doleta.gov/wioa/NPRM.cfm>.

## Sec. 3. Program Service Categories

The following youth are eligible for WIOA Youth funded services. Specific eligibility requirements within these categories may be defined in RFPs and YSP contracts.

### (a) In-School Youth

Youth ages 14-21, attending school, low income and meets one or more of the barriers listed in the [SDWP Operations Manual Chapter 7, Part 2: WIOA Youth Program Eligibility Manual](#).

### (b) Out-of-School Youth

Youth ages 16-24, not attending any school, and meets one or more categories listed in the [SDWP Operations Manual Chapter 7, Part 2: WIOA Youth Program Eligibility Manual](#).

WIOA emphasizes the importance of coordination among Federally-funded employment and training programs, including those authorized under WIOA. Many youth and young adults ages 16 to 24 meet eligibility requirements for both WIOA Title I youth activities and WIOA Title II Adult Education. Co-enrollment between these two programs can be very beneficial to disconnected youth as they can receive work experience and occupational skills through WIOA funding and literacy skills through adult education funding. Because the eligibility for adult education is similar to that for an OSY under WIOA, an individual who is not enrolled or required to be enrolled in secondary school under State law, it is

consistent to consider such youth already enrolled in adult education as an OSY for purposes of WIOA youth eligibility.

(c) Independent Living Skills/WIOA – Foster Care Youth

Youth ages 14-24 enrolled in the County of San Diego’s Independent Living Skills Program.

(d) San Pasqual Academy – Foster Care Youth

Youth ages 14-21 enrolled at San Pasqual Academy, a residential high-school for youth in the San Diego foster-care system.

**Sec. 4. Contract Target Populations**

YSP shall give priority to services that address the needs of disconnected youth and young adults ranging in age from 14-24. All youth served must meet Federal WIOA youth eligibility requirements. Priority should be given to the following target populations:

- Justice-involved youth;
- Pregnant or parenting youth;
- Youth with disabilities;
- Current or former foster youth;
- Refugee/immigrant youth;
- Youth residing in a public housing program;
- Homeless/runaway youth; and
- Youth that have dropped out of school and do not have a high school diploma or equivalent.

**Sec. 5. Program Management**

SDWP will be using the DOL Common Measures as the performance accountability system for services provided with WIOA funds. These standards are determined by the DOL along with the State of California but based upon local negotiations with SDWP as indicated in [Youth Performance Corrective Action Policy-Attachment A](#). The Common Measures are:

- Attainment of degree or certificate;
- Placement in employment, education or training;
- Earnings after entry into unsubsidized employment;
- In-program skills gain; and
- Employer and youth satisfaction.

To drive continuous improvement and increase program impact, enrollments will be increased five percent every year the contract is extended based on level funding.

**Sec. 6. Tracking Requirements**

The YSP must utilize the CalJOBS data management system. This includes the entry of individual participant data such as eligibility determination, demographics, activities, case notes, outcomes and follow-up data. Timely data entry is required and must be entered within five (5) business days after the date of any individual activity. SDWP will conduct ongoing monitoring to evaluate the YSP’s use of CalJOBS. Failure to comply with the required use will result in corrective action and may result in the

contract being terminated. Refer to [SDWP Operations Manual Chapter 5, Participant Tracking and Reporting System](#).

### Sec. 7. Technology System Requirements

The Contractor must comply with SDWP technology system requirements as indicated in [Technology Requirements-Attachment B](#).

### Sec. 8. Program Components

YSP must ensure that they will provide the following program design components that incorporate the 14 Youth Program elements that must be available to all enrolled participants, either by the YSP, subcontractors, collaborators and/or through referral relationships. The elements are defined in [WIOA 14 Youth Program Elements-Attachment C](#). The individual services provided to each participant must be based on an assessment and included on the Individual Service Strategy (ISS).

### Sec. 9. Educational Services.

Services must include instructional approaches that offer a continuum of skill, grade-level, and developmentally appropriate educational options that connect to career pathways. WIOA and local mandated educational activities include:

- Tutoring;
- Study skills training;
- Evidence-based dropout prevention and recovery strategies that lead to completion of secondary school diploma or its recognized equivalent or for a recognized post-secondary credential;
- Alternative secondary school services;
- Dropout recovery services;
- Activities that help participant prepare for and transition to post-secondary education and advanced training; and
- Prepares an individual to be successful in any of a full range of secondary or post-secondary educational options.

#### (a) Career Pathways.

WIOA places a strong emphasis on career pathways, defined as a combination of rigorous and high-quality education, training, and other services that:

- Includes counseling to support individuals in achieving education and career goals;
- Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable; and
- Helps an individual enter or advance within a specific occupation or occupational cluster.

(b) Work Readiness Training.

Work readiness is critical in setting the foundation for work experience opportunities and therefore must be offered to all participants in the program. Youth need the guidance on how to get a job and how to keep that job. WIOA and local mandated work readiness training activities include soft skills and hard skills.

(c) Work Experience Opportunities.

WIOA includes a focus on providing youth with work experience opportunities. Work experience provides participant an invaluable opportunity to develop work place skills. Paid and unpaid work experience must include academic and occupational education and may include the following types of work experiences:

- Summer employment opportunities and other employment opportunities available throughout the school year;
- Pre-apprenticeship programs;
- Internships and job shadowing; and
- On-the-job training opportunities.

Participant funds may be used to pay wages and related benefits for work experience in the public, private, non-profit sectors when the participant's objective assessment and ISS indicate that a work experience is appropriate. Additionally, youth funds may be used to pay wages and staffing costs for the development and management of work experience. Staff costs incurred for the functions and activities directly serving participants may count as program costs.

(d) Youth Development.

Positive youth development is important to incorporate into the program design to give youth opportunities to grow and lead in their community. WIOA and local mandated youth development activities include:

- Leadership development opportunities;
- Financial literacy education;
- Entrepreneurial skills training;
- Community service;
- Peer-centered activities encouraging responsibility;
- Positive social and civic behaviors; and
- Adult mentoring.

For definitions reference [Glossary of Terms-Attachment D](#).

## Sec. 10. Program Requirements

(a) Outreach, Recruitment and Orientation

Outreach and recruitment includes, but is not limited to, identifying potentially eligible participant, working with parents and guardians to secure necessary documentation, and working closely with other government agencies, school districts, and other partners to recruit participants. As part of orientation, all participants must receive information on all services offered.

(b) Intake, Eligibility Determination and Registration

YSP will determine WIOA eligibility of all youth applicants and verify all necessary documents. All youth must be determined eligible prior to enrollment and WIOA funded services are provided. All youth must be registered in CalJOBS.

Refer to the [Operations Manual Chapter 7, Part 2: WIOA Youth Program Eligibility Manual](#) for eligibility requirements and [SDWP Operations Manual Chapter 5, Participant Tracking and Reporting System](#).

(c) Referral

Participants who do not enroll in WIOA programs should be provided information regarding other services available through America's Job Centers of California (AJCC) and other local programs.

(d) Multimedia and Communication Release Form

The Multimedia Publicity/Privacy Release form is a required form to be completed at registration. However, the applicant or the parent or legal guardian (if the applicant is less than 18 years of age) has a choice and may decline to sign this authorization form and they will not participate in any marketing or publicity events.

To use the Multimedia Publicity/Privacy Release form, print out the form and have it signed by the participant or their parent or legal guardian (if the applicant is less than 18 years of age). A hard copy must be kept and a copy of the signed form must be provided to the applicant (parent or legal guardian if the applicant is less than 18 years of age). Refer to the [Multimedia Release Form-Attachment E](#).

(e) Objective Assessment

YSP must conduct an objective assessment of the academic level, skill levels, career pathway and service needs of each participant, which will include a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, mental health services, and development needs. The goal is to accurately evaluate each youth in order to develop an appropriate ISS to meet their individual needs. In addition, eligible youth should be given further assessment if determined appropriate.

(f) Literacy and Numeracy Assessment

Youth Service Providers must conduct an objective assessment of the Educational Functioning Level (EFL) of each participant to determine basic skills.

(1) Approved Literacy and Numeracy Assessments

The following are the current approved testing instruments for literacy and numeracy skills and/or literacy in English-as-a-Second Language levels:

- Tests for Adult Basic Education (TABE); and
- Comprehensive Adult Student Assessment Systems (CASAS).

(2) Timeline and/or Frequency



- YSP will administer pre-tests AFTER participation (enrollment).
- Literacy/Numeracy pre-test must be conducted within sixty (60) days of participation (enrollment)
- Literacy and Numeracy Assessment information must be entered on the Individual Service Strategy (ISS) for pre and post test scores.
- If participant is basic skills deficient, then the post-test must be administered within 12 months of participation date on the CalJOBS participation form or before exit date in CalJOBS
- If participant is not basic skills deficient, then no post test is required

### (3) CalJOBS Activity Codes

- 412 Objective Assessment
- Also enter information in the Literacy/Numeracy Records Form

### (4) CalJOBS Activity Case Notes

At minimum, activity case notes must include:

- Type of test such as pre-test, progress test or post-test
- Type of literacy/numeracy assessment (example: CASAS or TABE)
- Test version (example: TABE 9 or TABE 10)
- If basic skills deficient or not basic skills deficient

### (5) Participant File Documentation

At minimum, documentation must include the original answer sheet with test information included and name of staff that administered test or print out of the results if administered on-line.

Reference [Literacy/Numeracy Testing Guidelines-Attachment F](#).

#### (g) Active & Consistent Engagement with Participant

YSP should engage youth and young adults on a regular basis, building a relationship and helping them progress towards their goals. YSP must add an activity every 30 days into CalJOBS. If a value-added service is not provided and entered into CalJOBS during a 90-day period, the participant will be exited from the program (soft exit) and the YSP can no longer provide many of the WIOA services the youth still may need to complete his or her ISS plan, leading to negative WIOA performance outcomes.

#### (h) Individual Service Strategy (ISS)

YSP should use the results of the objective assessment to develop the ISS for the participant. The ISS is an age appropriate, individualized, written plan of short and long-term goals that include career pathways, education and employment goals, involvement in WIOA program elements, support services, incentives, and stipends. For all participants, the ISS will identify the timeframe in which each youth will be expected to complete all activities related to each of the goal(s) specified in the ISS. The ISS will clearly connect the services to be provided to each youth identifying the outcomes to be achieved

between WIOA participation and exit. The ISS must directly link to one or more indicators of performance outcomes.

(1) Timeline and/or Frequency

- At or after enrollment
- Must be conducted within thirty (30) days of enrollment
- Must be updated every 3-6 months

(2) CalJOBS Activity Code

- 413 Develop Service Strategies
- Case note should include a summary of the ISS

(3) Elements of the ISS

The ISS must have the following components documented:

(A) Background Information – Includes contact information, educational experience and/or general work experience and skills.

(B) Barriers – Refers to things that in the past or in the future may present obstacles to achieving goals. Barriers can be self-identified by the participant or determined by the case manager based upon educational, employment or other history, and/or through observational interviewing techniques.

(C) Assessment Results – Academic skill levels; i.e. literacy and numeracy skill levels as well as results from interest, aptitude, disability, and career pathways and life skills assessments, must be documented. Literacy and numeracy assessment results can only be attained through approved testing instruments. Other areas of assessment can be gathered through a variety of testing instruments and/or observational interviewing techniques. Refer to [Literacy/Numeracy Testing Guidelines-Attachment F](#).

(D) Training and Supportive Services Plan – This is the goal setting portion of the ISS and must document the decisions made between the participant and the case manager regarding the type of training services to be provided and the plan for the delivery of those services, including referrals to any other programs. The ISS must directly link to one or more indicators of performance outcomes. Goal setting areas include:

- Education Goals;
- Personal Goals;
- Work Readiness Goals; and
- Employment/Career Pathway Goals.

(E) Dates and Signatures – The ISS must be dated and signed by the participant and their case manager. Participants should understand that to the greatest extent possible, reasonable attempts will be made to provide the services outlined in the ISS; however, they may not always be provided or available.

Refer to [Individual Service Strategy \(ISS\)-Attachment G](#).

(i) Case Management

YSPs are encouraged to incorporate customer-centered, positive youth development and trauma informed care into their case management models. The process extends from recruitment through follow-up. The case manager motivates participants and coordinates services and information to prepare youth for post-secondary education opportunities, academic and occupational training or employment and training opportunities as appropriate.

(j) Supportive Services

YSPs can provide supportive services to participant once they are enrolled in the program that are necessary to enable an individual to participate in activities authorized under WIOA. While a youth may be eligible for supportive services, they do not have an unrestricted right to such supportive services. The needs of each youth must be determined based on an individual assessment, and as documented in the participants ISS. YSPs must ensure that the amount spent to provide the supportive service resource or payment is reasonable and allowable under the funding source used, as well as within the limits set in the policy, as described below.

A maximum of \$800.00 per program year may be made available for each eligible participant for the following types of allowable services:

- Housing/Shelter;
- Transportation;
- Clothing/Uniforms;
- Work-Related Tools/Equipment;
- License/Certification Fees;
- Optical needs such as eyeglasses or protective eye gear;
- Short-term child care; and/or
- Other needs related to training or employment retention, as determined by the case manager, to ensure the youth can continue to participate in and complete WIOA activities.

(k) Documentation and Receipts

All necessary supportive services must be specified in the youth's ISS and be based on the results of the objective assessment.

Records of supportive service payments using WIOA funds must be maintained in accordance with record retention requirements so that the SDWP is able to verify accuracy, timeliness and record keeping by the YSP as follows:

- Required [Supportive Service Form-Attachment H](#);
- Receipt of purchase with date, purchase detail and total amount;
- A worksheet in the youths file to keep track of all support services payments made; and
- A worksheet showing how the payment amount was calculated must be maintained in the youth's file.
- For mileage/travel assistance:

- If gas card/bus pass or token is provided, copies of the card/pass signed and dated by the participant on the date of receipt;
- A copy of the determination of distance, such as MapQuest, is kept in the file; and
- If gas card is provided, the client mileage/travel log is completed by the participant and returned to the Supportive Services provider at the end of the month.

If payment is made to the youth in advance of the purchase, the youth must provide a receipt to the YSP once the purchase is completed, and the receipt must then be attached to the worksheet; YSP, along with youth, must complete Supportive Services-Attachment H requiring the participant to bring back the receipt once the supportive service payment is made. If not returned, no additional supportive services may be provided. The YSP must perform and record in CalJOBS if a participant fails to return the receipts for the supportive services provided in full by due date:

- Contact the participant requesting the missing receipts and explain that no further supportive services will be provided until the missing receipts are received in full;
- Notify your assigned Program Specialist through SDWP, via e-mail, of the outstanding receipts and that no further supportive services will be processed for the participant until the receipts are collected; and
- Send a follow-up letter within five (5) business days from when receipts were due to the participant requesting the receipts and notifying the customer that no further supportive services will be provided until all receipts are received. A copy of this letter must be kept in the participant's file.

#### (l) Separation of Duties

Duties of staff dispersing supportive service payments must be separated so that no one individual has complete authority or control over an entire financial transaction. For example, the person conducting the assessment, the person processing the payment and if a payment is mailed, the person mailing out the check shall not be the same person.

Participant records (ISS, case notes, and worksheets) and contractor financial records, pertaining to supportive service payments, must be made available for review by local, State and Federal monitors, as well as must meet the financial management standards specified in the [SDWP Operations Manual Chapter 6, Financial Management](#), including enough information to provide:

- A comparison of actual expenditures with the budgeted amounts of each contract;
- Support for accounting records and to ensure proper charging of costs and cost allocation; and
- The ability to track funds to a level of expenditure adequate to establish that funds have not been used in violation of the applicable restrictions on the use of the funds.

Strict adherence by YSP to the required supportive service tracking and documentation procedures will help to ensure that supportive services are appropriately provided to participants, as well as prevent the probability of disallowed and/or questioned costs.

#### (m) CalJOBS Activity Codes

Refer to [SDWP Operations Manual Chapter 5, Participant Tracking and Reporting System](#).

(n) CalJOBS Activity Case Notes

At minimum, the CalJOBS activity case note must include the following:

- Type(s) of supportive service needs that were provided;
- How much was expended;
- If provided through in-kind services, the details should be included in the documentation;
- That the provision of the supportive service payment or resource is necessary to enable the participant to participate in program activities, to find a job, or to retain long-term employment;
- That the supportive services provided are not reasonably available through other agencies; and
- The funding source used to pay for the supportive service(s).

(o) Incentives

WIOA allows the payment of incentives to participant who achieve established goals as a result of program participation. Incentives can encourage participant to successfully complete program milestones on their ISS. Incentives may only be paid for activities which begin and are completed after participation (enrollment). All program incentive policies must be submitted to and approved by your assigned Program Specialist through SDWP before program implementation and incentives are given or promised to any participant.

(1) Types of Incentives

Incentives must be in the form of check, gift card or non-cash awards. Non-cash incentives are considered awards to participant for achievement and participation in WIOA related activities. YSP's must submit in detail, as part of their incentive policy, the types of non-cash incentives they propose to provide. Gift cards can include retail stores, book stores, etc., but no gift cards for entertainment activities.

(2) Compliance Procedures

- (A) YSP must ensure their programs are in compliance with the following procedures:
- (B) Incentives should be reflected in the contract budget;
- (C) Justification for receiving an incentive shall be directly linked to the goals on the participant's ISS;
- (D) Each participant shall be paid only after successful achievement of a milestone;
- (E) There must be a method in place for the participant to acknowledge receipt of incentive payments, and this acknowledgment (signature from the participant) must be kept in the participant's file;
- (F) Records of incentive payments provided to participant must be maintained in accordance with record retention requirements so that the SDWP is able to verify accuracy, timeliness and record keeping by YSP;
- (G) Duties of staff dispersing incentive payments must be separated so that no one individual has complete authority or control over an entire financial transaction; and

(H) Participant records and YSP financial records pertaining to incentive payments must be made available for review by local, State and Federal monitors, and must meet financial management standards in WIOA, including enough information to provide:

- A comparison of actual expenditures with the budgeted amounts of each contract;
- Support for accounting records and to ensure proper charging of costs and cost allocation; and
- Tracking of funds to a level of expenditure adequate to establish that funds have not been used in violation of the applicable restrictions on the use of the funds.

(3) CalJOBS Activity Codes

- 484 Supportive Service – Incentive
- 4.18.4. CalJOBS Activity Case Note
- At minimum, case note must include the following information:
  - Type of incentive (check, gift card or non-incentive);
  - Amount of incentive; and
  - Reason for incentive.

(4) Documentation

- Approved [Incentive Policy Form-Attachment I](#);
- Incentive Receipt (date and signed); and
- Copy of check or gift card with serial number.

(p) Youth Classroom-Based Stipends Policy

SDWP allows the option of providing stipends to participant in a classroom-based activity in any WIOA funded youth program, based on the following guidance:

(1) WIOA Youth Program Classroom-Based Stipends

Classroom-based stipends are allowable to participant enrolled into the WIOA program and may be paid in lieu of a wage for allowable activities. Activities should focus on classroom instruction that supports a participant's work experience and has a specific curriculum or training objective established.

Classroom-based stipends and wages are intended to be used to encourage and motivate WIOA participant to reach specific goals and obtain positive outcomes. Stipends may be paid based on actual hours of attendance and participation. The employer of record must adhere to all child labor laws regarding hours of employment, working conditions, etc. For more information see the following website: <http://www.dir.ca.gov/dlse/ChildLaborPamphlet2000.html>

Each YSP may develop Classroom-Based Stipends Policy for their program(s). Classroom-based stipends may only be paid for activities which begin and are completed after participation (enrollment). All Classroom-Based Stipends Policy must be submitted to and approved by your assigned Program Specialist through SDWP before program implementation, and before given or promised to any participant.

Classroom-based stipends and wages may be paid for satisfactory attendance, participation and completion of education and certificate attainment in any combination of the following activities:

- High school diploma, GED, or equivalent;
- Occupational/technical skills training;
- Pre-apprenticeship skills/trades training; or
- Career pathway/occupational skills training combined with work-based learning.

Payment must be based on actual time of participation in the activity as documented on the attendance sheet. The participant and the instructor must sign the attendance sheet before reimbursement can be made, and the signed sheet must be maintained in the participant's file.

Stipends may not be awarded for online or virtual classroom participation. Stipends shall not be disbursed until the participant meets all stipulated requirements and contractor staff verifies the attainment of the program outcome(s).

## (2) Required Documentation

All YSPs who provide stipends and wages as payments to participants, paid for with WIOA funds, must ensure that their methods of payment comply with the following required tracking and documentation procedures.

At a minimum, the following documentation must be maintained in the participant's file and/or CalJOBS:

- The participant's ISS must specify the goal that must be met in order to qualify for the stipend;
- Justification for payment of stipends and a description of the type of payment method and amount, if applicable, must be maintained in the file;
- Time sheets or attendance sheets for payments of stipends;
- Copy of high school diploma, GED or official transcripts verifying completion of a diploma or GED that includes required information for data validation; and
- Copy of certificate of attainment verifying completion of occupational/ technical skills, or pre-apprenticeship skills/trades training.

Records of stipend payments, paid for with WIOA funds, that are provided to participants must be maintained in accordance with record retention requirements so that the SDWP is able to verify accuracy, timeliness and record keeping as follows:

- YSP must document the determining factors in paying a stipend as opposed to a wage;
- A worksheet showing how the payment amount was calculated must be maintained in the participant's file;
- Duties of staff dispersing stipend payments must be separated so that no one individual has complete authority or control over an entire financial transaction. For example, the person conducting the assessment, the person processing the payment, and if a payment is mailed, the person mailing out the check shall not be the same person;
- Participant records (ISS, case notes and worksheets) and contractor financial records pertaining to stipend payments must be made available for review by local, stat, and Federal monitors, and must meet the financial management policies/standards specified

in the [SDWP Operations Manual Chapter 6, Financial Management](#) including enough information to provide:

- A comparison of actual expenditures with the budgeted amounts of each contract;
- Support for accounting records and to ensure proper charging of costs and cost allocation; and
- The ability to track funds to a level of expenditure adequate to establish that funds have not been used in violation of the applicable restrictions on the use of the funds.

(A) CalJOBS Activity Codes

- 419 Supportive Service – Stipend

(B) CalJOBS Activity Case Note/Documentation

- Follow guidelines in the stipend section above.

(q) Work Experience Guidelines

A minimum of 25% of the funds allocated must be spent on paid and unpaid work experiences, but the amount will vary depending on the amount determined in YSP contract. Including summer and yearlong employment opportunities, pre-apprenticeship programs, internships and job shadowing. Allowable expenditures beyond wages can include staff time spent identifying potential work experience opportunities, staff time working with employers to develop the work experience, staff time spent working with employers to ensure a successful work experience, staff time spent evaluating the work experience, participant work experience orientation sessions, classroom training or the required academic education component directly related to the work experience, and orientation for employers.

The State Department of Industrial Relations ([www.dir.ca.gov](http://www.dir.ca.gov)) Division of Labor Standards Enforcement, administers the Child Labor Laws in California (CL Pamphlet). These laws govern wages, work permits and hours, and working conditions which must be adhered to for youth.

(1) California Child Labor Laws

Almost all minors under the age of 18 are subject to California's child labor protections. Under the California Labor Code, "minor" is defined as any person under the age of 18 years required to attend school under the provisions of the Education Code, and any person under age six. "Dropouts" are subject to California's compulsory education laws, and thus are subject to all state child labor law requirements. Emancipated minors, while subject to all California's child labor laws, may apply for a work permit without their parents' permission.

(2) Employer Orientation

YSP are required to conduct an Employer Orientation and provide an information packet to all Worksite Supervisors prior to a participant's first day of work.

At minimum, the Employer Orientation must include the following:

- Health and safety standards;
- Federal Labor Law poster displayed at the worksite; and



- Reasonable accommodation for individual with disabilities as required by Americans with Disabilities (ADA).

### (3) Worksite Agreement & Training Plan

YSP must complete a Worksite Agreement and Training Plan with each employer. At a minimum, it must include the following:

- Work site organization name and supervisor contact information;
- Job title;
- Description of main job responsibilities; and
- Hourly rate.

### (4) Timesheets

Timesheets must follow DOL Fair Labor Standards Act (FLSA) and California Department of Industrial Relations.

Time sheets must be paper or electronic, at a minimum, include the following:

- Start and end time of each work period;
- Meal periods taken;
- Split shift interval;
- Total hours worked daily and for total pay period;
- Initials from participant and supervisor if changes made;
- No whiteout; and
- Timesheets must be signed by the participant and supervisor.

### (5) Timekeeping and Attendance Policy

YSP is required to have a policy in place for participant time and attendance records related to the completion and submittal of participant time and attendance records.

### (6) Employee Evaluation

Each employee should be evaluated on the following aspects:

- Punctuality and attendance;
- Work habits;
- Appearance;
- Communication;
- Task completion; and
- Follows direction.

### (7) Employer of Record

YSPs can provide direct monetary payments to participant or work with a third-party agency to provide hourly wages and/or serve as the employer of record. The employer of record must adhere to all child labor laws regarding work permits, hours of employment, timecards, working conditions, etc.

Refer to [Employment Timesheet-Attachment J](#).

(8) Job Safety and Working Conditions

The California Child Labor Laws also contain child labor restrictions to ensure participant are not assigned to activities that violate these standards or restrictions. Some of the areas covered are restricted and prohibited occupations, employer requirements and penalties for violating child labor laws. A copy of the complete text is available at [www.dir.ca.gov/dlse/ChildLaborPamphlet2000.html](http://www.dir.ca.gov/dlse/ChildLaborPamphlet2000.html).

(9) Nepotism

As indicated in WIA Sec. 667.200(g)(1), no individual may be placed in a WIOA employment activity if a member of that person's immediate family is directly supervised by or directly supervises that individual; and WIA Sec. 667.200(g)(2) to the extent that an applicable State or local legal requirement regarding nepotism is more restrictive than this provision, such State or local requirements must be followed.

(10) Employment in Sectarian Activities

According to WIA Section 188(3), participants shall not be employed under this title to carry out the construction, operation, or maintenance of any part of any facility that is used for, or to be used for, sectarian instruction or as a place for religious worship (except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants).

(11) Minimum Wage

Every employer shall pay to each employee wages not less than California Minimum Wage <http://www.dir.ca.gov/iwc/MW-2014.pdf>.

(12) Workplace Postings

In California, all employers must meet workplace posting obligations. Workplace postings are usually available at no cost from the requiring agency. The Department of Industrial Relations requires employers to post information related to wages, hours and working conditions in an area frequented by employees where it may be easily read during the workday. Additional posting requirements apply to some workplaces. California Workplace Postings <http://www.dir.ca.gov/wpnodb.html>.

(13) CalJOBS Activity Codes

Refer to the [SDWP Operations Manual Chapter 5, Participant Tracking and Reporting System](#).

(14) Documentation

At minimum, the following documentation must be accessible for each participant:

- Work Permit for Minors (if applicable);
- I-9 Employment Eligibility Verification;
- W-4 Employee's Withholding Allowance Certificate;
- Worksite Agreement & Training Plan;
- Timesheets (paper or electronic, signed by participant and supervisor); and
- Pay stubs, direct deposit records or other proof of payment.

(r) Credential Attainment

All WIOA YSPs will use the DOL definition of Certificate under the WIOA Common Measures for all Credential Attainments as defined in the Training and Employment Guidance Letter (TEGL) 17-05 Common Measures Policy for the ETA Performance Accountability System and Related Performance Issues, issued on February 17, 2006. This TEGL can be accessed at:

<http://wdr.doleta.gov/directives/attach/TEGL17-05.pdf>.

(1) Credential Attainment Definition

A credential is awarded in recognition of an individual's attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills are based on standards developed or endorsed by employers. Certificates awarded by workforce investment boards are not included in this definition. Local Work Readiness Certificates are also not included in this definition of credential attainment.

A certificate is awarded in recognition of an individual's attainment of technical or occupational skills by:

- A State educational agency or a State agency responsible for administering vocational and technical education within a State;
- An institution of higher education, described in Section 102 of the Higher Education Act (20 USC 1002), that is qualified to participate in the student financial assistance programs authorized by Title IV of that Act. Some examples of this include:
  - Community Colleges;
  - Proprietary Schools; and
  - All other institutions of higher education that are eligible to participate in Federal student financial aid programs.
- A professional, industry, or employer organization, such as:
  - National Institute for Automotive Service Excellence certification;
  - National Institute for Metalworking Skills, Inc.; or
  - Machining Level I credential.
- A product manufacturer or developer using a valid and reliable assessment of an individual's knowledge, skills and abilities, such as:
  - Microsoft Certified Database Administrator;
  - Certified Novell Engineer; or
  - Sun Certified Java Programmer.
- A registered apprenticeship program;

- A public regulatory agency, upon an individual’s fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title, or to practice an occupation or profession, such as:
  - FAA aviation mechanic certification; or
  - State certified asbestos inspector.
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons;
- Job Corps centers that issue certificates; or
- Institutions of higher education, which are formally controlled, or have been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes.

#### (2) Post-Secondary Education

A program at an accredited degree-granting university that leads to an academic degree (e.g., AA, AS, BA, BS). Does not include programs offered by degree granting institutions that do not lead to an academic degree.

#### (3) Advanced Training

An occupational skills employment/training program, not funded under Title I of the WIOA, which does not duplicate training received under Title I and includes only training outside of the AJCC, WIOA and partner system (i.e., training after exit).

#### (4) Documentation

Copy of degree, certificate or credential.

#### (s) Follow-Up Services

YSPs must provide follow-up services for at least twelve (12) months for all participant, regardless of intensity of services, after participant exit the program. These services may include, but are not limited to:

- Technical skills training;
- Peer counseling;
- Adult mentoring;
- Crisis intervention;
- Life skills; and/or
- Incentives and support services to sustain success achieved during program participation.

These services will help youth ensure that they meet and maintain their career goals and job retention.

#### (1) CalJOBS Activity Codes

Reference the [\*\*SDWP Operations Manual Chapter 5, Participant Tracking and Reporting System.\*\*](#)

#### (2) Follow Up for Reporting Purposes

Follow up for reporting purposes must be completed on a quarterly basis and entered into CalJOBS. It is used to record the information from participants during follow-up contacts after exit. Follow up determines a participant's employment and educational status after exiting the WIOA program.

(t) Participant File Content

YSPs must maintain a participant file on each registered youth. At a minimum, the file must contain eligibility, program and closure documentation.

(1) Intake Documentation (required)

- Eligibility Certification Review Form (ECRF);
- Eligibility Documentation as applicable;
- Universal Participant Authorization Form (UPAF); and
- Multimedia Release and Communications Release Form.

(2) Program Documentation (required)

- Individual Service Strategy (ISS); and
- Literacy/Numeracy Assessment Pre-Test and Post-Test (if applicable).

(3) Program Documentation (if applicable)

- Supportive services;
- Incentives;
- Stipends; and
- Work experience.

(4) Closure Documentation

- Performance related documentation (if applicable)

(u) Maintenance of Records

Contract documentation and records must be maintained within the geographical region of San Diego County. Records pertaining to the contract must be retained for a period of at least eight (8) years following contract termination date and/or until pending litigation and/or audit findings have been resolved.

(1) Reference

General Provisions 30.0 Maintenance of Records and Access to Records and OMB 2 CFR Part 200 or 2900.

(v) Contracted Monitoring Reviews

In an effort to continuously improve our systems and services, the SDWP Program Specialist may conduct the following types of monitoring for all contracts issued by the SDWP:

### (1) File Reviews

Conduct hard copy and electronic file reviews on a sampling of registered participant's information and aggregate program information through the review and analysis of CalJOBS data. All participant program activities and services will be examined to ensure programmatic compliance. File monitoring will include, but not be limited to, a review of the intake and referral process, eligibility certification, registration, assessment, career counseling, ISS, training, supportive services and CalJOBS usage. Refer to [Participant File Monitoring Checklist-Attachment K](#).

### (2) Contracted Monitoring Reviews

Twice a year SDWP through a contracted monitoring firm monitors YSPs. For better coordination of oversight activities, the Program Specialists are required to attend entrance/exit conferences (either in person or by phone), conducted by SDWP contracted monitors during their on-site monitoring of the YSPs. The Program Specialists will follow-up on YSPs implementation of corrective action(s) recommended by the contracted local monitors. For additional information on contract monitoring, refer to [SDWP Operations Manual Chapter 8, Monitoring](#).

## Sec. 11. Attachments

[Youth Performance Corrective Action Policy-Attachment A](#)

[Technology Requirements-Attachment B](#)

[WIOA 14 Youth Program Elements-Attachment C](#)

[Glossary of Terms-Attachment D](#)

[Multimedia Release Form-Attachment E](#)

[Literacy/Numeracy Testing Guidelines-Attachment F](#)

[Individual Service Strategy \(ISS\)-Attachment G](#)

[Supportive Service Form-Attachment H](#)

[Incentive Policy Form-Attachment I](#)

[Employment Timesheet-Attachment J](#)

[Participant File Monitoring Checklist-Attachment K](#)