

OPERATIONS MANUAL CHAPTER 4. PART 1: ADULT AND DISLOCATED WORKER PROGRAM ACTIVITIES

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I. INTRODUCTION

The San Diego Workforce Partnership (SDWP) Operations Manual provides detailed requirements, instructions and guidelines for Subrecipients managing SDWP workforce development programs. The policies mentioned herein references to *Subrecipient* applies to and includes any Workforce Innovation Opportunity Act (WIOA) funded partner, AJCC Operator, employer, entity, service provider, utilizing San Diego Workforce Partnership (SDWP) program funding (29 CFR 38.4[zz]). This section is intended for Subrecipients 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.

The terms and conditions of the SDWP Operations Manual is subject to change, and may change, based upon (i) legislation, (ii) additions, modifications, or revisions to federal and/or state laws, regulations, requirements, procedures, or interpretive materials which may affect the workforce development system, (iii) DOL regulations and procedures, (iv) EDD regulations and procedures, and (v) the adoption by SDWP's governing board of local direction and procedures. Subrecipient agrees to remain informed of the WIOA and its regulations and requirements.

A. SOURCES FOR WIOA ELIGIBILITY REQUIREMENTS

Guidelines and requirements of the SDWP's WIOA Title I eligibility certification process are based on the DOL and EDD official source documents listed below:

a) *DOL Final Rules and Resources*

<https://www.doleta.gov/wioa/about/final-rules/>

b) *DOL Notices of Proposed Rule-Making (NPRMS)*

<https://www.federalregister.gov/documents/2015/04/16/2015-05530/workforce-innovation-and-opportunity-act-notice-of-proposed-rulemaking>

c) *DOL Training and Employment Guidance Letters (TEGLS)*

https://wdr.doleta.gov/directives/all_advisories.cfm

d) *EDD Directives*

http://www.edd.ca.gov/jobs_and_training/Active_Directives.htm

http://www.edd.ca.gov/jobs_and_training/View_Draft_Directives_Closed_for_Comment.htm

http://www.edd.ca.gov/jobs_and_training/View_and_Comment_Open_Directives.htm

B. WIOA ADULT AND DISLOCATED WORKER ELIGIBILITY

The following participants are eligible for WIOA Adult and Dislocated Worker (DW) funded services. Specific eligibility requirements within these categories are defined in ***SDWP Operations Manual, Chapter 7, Part 1: WIOA Adult and Dislocated Worker Program Eligibility*** and within the subrecipients contracts.

- Adult – meets required income level, 18 years or older, registered for selective service (for males 18 or older), meets priority of service and demonstrates need for services beyond Basic Career Services to achieve employment.
- DW – Has been terminated or laid off, or has received notice of termination or layoff, 18 years or older, registered for selective service (for males 18 or older), and demonstrates need for services beyond Basic Career Services to achieve employment.

C. CALJOBS

CalJOBS is the required system administered in partnership with EDD to document all WIOA program activities. For processes and requirements, refer to ***SDWP Operations Manual, Chapter 5: CalJOBS Data Entry Policies and Procedures*** and the CalJOBS Forms and Procedures Handbook.

1. CalJOBS Registration

CalJOBS registration begins an information collection process and is used to help manage the individual, create resumes, enroll the individual in programs, and provide services.

2. CalJOBS Activity Codes

CA EDD CalJOBS system frequently updates activity codes. For program services use the most appropriate code available.

3. CalJOBS Case Notes

All case notes related to program activities should be concise, clear, spelled properly, and grammatically correct. Case notes should be professional, ethical, and objective. Case notes are part of the participant's legal file and may be used to determine the legitimacy of expenditures, complaints, grievances and/or disputes.

4. WIOA Application & Participation Form

Once CalJOBS registration has been completed, a WIOA application and participation form must be created to indicate program eligibility and participation. The participation form will trigger the Objective Assessment Summary and Individual Employment Plan (IEP) requirements.

5. Tracking Requirements

Timely data collection is required. Entry of applications, objective assessments, ISS/IEP, activities, case notes, and closure forms must be entered within seven (7) calendar days after the date of occurrence.

D. PROGRAM EXPENDITURE PRIOR TO PARTICIPATION

There are limited instances where WIOA funds may be expended on costs related to individuals who are not yet participants in the WIOA program. WIOA funds can be expended on outreach and recruitment or basic career services but they cannot be spent on individualized program services, such as assessment, training or supportive services prior to eligibility determination.

E. MONITORING, ACCESSABILITY AND CONDITION OF RECORDS

SDWP and/or a third-party monitor contracted through SDWP, EDD, and in some cases DOL will conduct monitoring of program activities within the participant's records during oversight visits. Refer to ***SDWP Operations Manual, Chapter 8: Oversight and Monitoring*** and **ATTACHMENT – ADULT AND DISLOCATED WORKER PARTICIPANT FILE MONITORING CHECKLIST**.

WIOA requires that Subrecipients receiving WIOA funds provide access to all documentation/records used in providing program activities to registered participants. Participant files must be available and easily accessible to federal, state and local monitors and other authorized persons, including documentation of required corrective actions.

All required forms must be filled in completely and properly signed. White out, correction tape, or correction fluid is not permitted on any of the forms and will not be accepted as valid by the SDWP or EDD monitors if found on a document.

F. RECORD RETENTION

WIOA record-retention requirements dictate that participant hard copy files, must be maintained and made available, if requested, by the SDWP or state /federal funding sources for a period of four (4) years from the Subrecipients contract closeout. If any open findings, grievances or other claims related to the records exist at the end of the four-year (4) period, the records must be maintained indefinitely, until all findings or other issues are fully resolved.

In the event a Subrecipient ceases operations and has no place for storage of the records, the Subrecipient shall notify the SDWP and deliver the records to a location designated by the SDWP. All participant records must be accounted for. Missing records may result in disallowed costs.

G. COLLECTION OF MEDICAL INFORMATION

While collection and data entry of medical information, including disability-related information, may be required, the documentation **shall not** be kept in the participant's case file or recorded as data entry on CalJOBS. When asking any question that could lead to the disclosure of a disability (including, but not limited to: an individual with a disability requesting an accommodation, headaches, allergies, addiction, etc.) the Subrecipient must follow the following steps to ensure privacy and confidentiality of the information.

Collection of Medical Information Process

- Complete any required program forms and documents, as necessary;
- If there is medical or disability-related information indicated on any of the forms/documents, those forms/documents must be kept in a separate, locked file.
 - A stand-alone case note with the subject line "**COLLECTION OF ELIGIBILITY INFORMATION**" shall be used and contain the following:

Reference additional file for collection of information of the following forms/eligibility documents: LIST ANY FORMS/DOCUMENTS KEPT IN A SEPARATE FILE.

Note: Case notes, printed or not, and any documentation cannot include any language that would include medical or disability-related information, including, but not limited to using the following words: "medical file, disability, reasonable accommodation, SSI," or anything related. Any printed materials in the participant's case file, or electronic case notes in CalJOBS that include it will be considered a finding.

1. Access to Medical Information

The information shall be treated as confidential medical records, and access to the records must be limited, except to the extent of the following:

- *Knowledge of disability status or medical condition and access to information in related files:*
 - **Program staff** who are responsible for documenting eligibility, where disability is an eligible criterion for a program or activity.

- **First aid and safety personnel** who need access to underlying documentation related to a participant's medical condition in an emergency.
- **Government officials** engaged in enforcing this part
- *Knowledge of disability status or medical condition only.*
 - **Supervisors, managers, and other necessary personnel** may be informed regarding restrictions on the activities of individuals with disabilities and regarding reasonable accommodations for such individuals.

Refer to *SDWP Operations Manual, Chapter 7, Part 1: Adult and Dislocated Worker Eligibility, Chapter 5. CalJOBS Data Entry Policies and Procedures, Chapter 9. Nondiscrimination and Equal Opportunity Policy and Complaint Procedures* for more information regarding collection of medical information.

H. SUSPENSION FROM THE AJCC

The Subrecipient provides universal access employment related services to all eligible and enrolled participants regardless of race, color, religion, gender, sexual orientation, national origin, age, disability, political affiliation or belief. In order to provide a safe and secure environment conducive to the proper and successful use of the resources and services at an AJCC, Subrecipients have the authority to suspend the privileges of unruly, disruptive and/or otherwise threatening job seekers. Follow your internal suspension policy and refer to *Chapter 9. Nondiscrimination & Equal Opportunity Policy and Complaint Procedures* for more information regarding uniform procedures for Subrecipients when suspending job seeker privileges.

II. PROGRAM COMPONENTS

A. ACCESS & LOCATIONS

Subrecipients are required to address transportation and other barriers by increasing access points for participants. Subrecipients will maintain a comprehensive office, affiliate or a specialized site.

1. Comprehensive America's Job Center of California (AJCC)

A comprehensive AJCC is a physical location where job seekers and employers can access the programs, services, and activities of all required career center partners, along with any additional partners as determined by SDWP.

2. Affiliate and Specialized America's Job Center of California (AJCC)

Other points of services in addition to comprehensive AJCC. Such access points are called affiliate AJCCs and are created to supplement and enhance job seeker access to AJCC services. These sites make one or more of the career center partners' programs, services, and activities available to job seekers and employers. Specialized AJCCs are defined as sites that address specific needs, including those of dislocated workers, youth, or key industry sectors or clusters that are connected to the AJCC network.

B. PARTNERSHIPS

Subrecipients are expected to demonstrate local partnerships by establishing a “Memorandum of Understanding” (MOU) with the four-required career center partner programs such as WIOA Title I-B (Adult, Dislocated Workers and Youth), WIOA Title II (Adult Education and Literacy), WIOA Title III (Wagner-Peyser) and WIOA Title IV (Vocational Rehabilitation).

Other partners include:

- Career & Technical Education
- Title V Older Americans Act
- Job Corps
- Native American Programs
- Migrant Seasonal Farmworkers
- Veterans
- Youth Build
- Trade Act
- Community Services Block Grant (CSBG)
- Housing and Urban Development (HUD)
- Unemployment Compensation

Subrecipients shall demonstrate how they will partner and collaborate with the partners mentioned above. In addition, Subrecipients must also identify in a MOU information regarding the financial support partners will provide to the AJCC, as well as the services they will provide.

1. Braiding of Funds

Braiding of funds is the process of using different funding streams to support different needs for the same participant while maintaining documentation to support the charging and allocations of cost to the separate funds. Braiding of funds will provide more comprehensive services to participants and maximize partner resources available to assist jobseekers and employers.

Braiding of funds must meet the following criteria:

- The cost of each funding stream is tracked, documented, and allocated based on the proportional benefit.
- The cost benefits two or more programs in proportions that can be determined without undue effort or cost.
- Adult and DW participants meet the eligibility requirements for each program from which they are receiving funds.

Example: A participant is enrolled in a WIOA Title I Adult/DW program and a WIOA Title II adult education program. The WIOA Title I resources can provide career guidance, occupational training and job placement, while the WIOA Title II resources can provide adult education.

C. BUSINESS SERVICES

Subrecipients shall have a Business Services team at the AJCC which should consist of Business Services Representatives (“BSRs”). The BSRs are to serve businesses and job seekers, building long-term relationships with employers and defining business services based on their needs. BSRs serve as the bridge between job seekers pursuing employment and employers looking to fill positions. BSRs should understand San Diego’s labor market and foster relationships with employers who are recruiting for in-demand jobs with potential for growth. The BSRs should inform job seekers of the region’s priority sectors, and source positions whose skills match the AJCC network’s pool of job seekers. AJCC BSRs must be knowledgeable of eligibility and performance requirements.

Subrecipients shall work with the Department of Business Services at SDWP, comprised of Business Partnerships and Business Solutions teams. These teams will function in collaboration with the AJCC network to encourage integrated services, eliminate duplication of efforts and share best practices. The career centers' Business Services team shall have representation at SDWP's Regional Business Services meetings and join the collective conversation for an effective strategy across the region.

1. Rapid Response

The Worker Adjustment and Retraining Notification (WARN) Act protects employees, their families, and communities by requiring that employers with 75 or more employees give a 60-day notice to the affected employees and both state and local representatives prior to a plant closing or mass layoff. This provides workers with sufficient time to prepare for the transition between the jobs they currently hold and new jobs. This transition may involve the provision of information about where new jobs may be found, or it may involve providing workers with other employment or retraining opportunities before they lose their jobs.

At the state level, the California Employee Development Department (EDD) has established Rapid Response Teams to assist employers and workers during a mass layoff or plant closing. These teams are a cooperative effort between the local area and the EDD. This team disseminates information about the adult and dislocated worker services available under Title I of the Workforce Innovation and Opportunity Act and through the AJCC, and Unemployment Insurance programs. If the dislocation is the result of foreign competition or foreign relocation, the dislocated worker may be eligible for assistance, income support, job search assistance/relocation, and/or training under the Trade Adjustment Assistance (TAA) Program.

SDWP will manage and coordinate presentations (WARN orientations) by the local Rapid Response Team for San Diego County. SDWP receives a WARN notification from a local employer and contacts the employer to schedule a WARN orientation for the affected employees. When this orientation is scheduled, SDWP staff contact AJCC notifying them of the employer name, date, time, address and how many employees will be attending. Upon notification from SDWP staff of a WARN orientation, the AJCC determines the representative that will attend and responds to SDWP with the name of the individual. The AJCC representative will be responsible for speaking to the affected employees and providing information about services available at the AJCCs (e.g., training, job fairs, workshops, etc.). All WARN activities are governed by the [Code of Federal Regulations](#), [California Labor Code](#), [Training and Employment Guidance Letter No. 26-14](#), [California Workforce Services Directive \(WSD\) 16-04](#), and the [Training and Employment Notice No. 9-12](#).

D. VOSGREETER

Subrecipients are required to use the VOS Greeter module at the AJCC which is designed to assist Adult and DW programs (Title I) and Wagner-Peyser (Title III) staff record AJCC visitor traffic electronically in-lieu of a paper sign-in sheet. The module allows offices to track the number of individuals visiting an AJCC and the purpose of their visit.

E. MEETINGS, TRAININGS & REPORTS

Subrecipients shall send designated staff to attend and participate in all scheduled meetings and trainings that are provided or in coordination with SDWP.

Subrecipient shall be required to submit **ATTACHMENT – QUARTERLY NARRATIVE REPORT** documenting progress and/or obstacles and provide additional requests for technical assistance. SDWP Staff will include assistance provided and any internal or external monitoring's noting trends in observations and/or findings.

III. PROGRAM SERVICES

Subrecipients have the discretion to determine what specific program services a participant receives, based on each participant's OAS and IEP. Subrecipients are not required to provide every program service to each participant.

A. OUTREACH, RECRUITMENT & ORIENTATION

Outreach and recruitment include, but is not limited to, identifying potentially eligible Adult and DW's by working with partners and community-based organizations. As part of orientation, all participants must receive information on all services available through the AJCC.

B. REFERRALS

Eligible job seekers who do not enroll in WIOA programs should be provided information regarding other applicable and appropriate services available through other local programs that have capacity to serve them.

C. INTAKE, ELIGIBILITY DETERMINATION & REGISTRATION

Subrecipients are responsible for determining WIOA eligibility of all applicants recruited into the program, determining the suitability for Adult and DW services, and collecting and verifying all necessary eligibility source documents. WIOA requires all applicants to meet certain eligibility criteria and be determined eligible prior to enrollment and receipt of WIOA funded services. **Refer to** SDWP Operations Manual, Chapter 7, Part 1: WIOA Adult and Dislocated Worker Program Eligibility **for more information regarding adult and dislocated worker eligibility.**

1. Re-Enrollment

Approval for re-enrollment will be on a case-by case basis for individuals who are no longer active participants. Re-enrollment criteria, process, exceptions, and limitations can be found in **SDWP Operations Manual, Chapter 7, Part 1: WIOA Adult and Dislocated Worker Program Eligibility.**

a) Re-Enrollment Documentation

If a participant is being re-enrolled, the Subrecipient must document the reason for re-enrollment on the IEP/OAS as explained on the approved **ATTACHMENT – RE-ENROLLMENT REQUEST FORM.**

b) Re-Enrollment Activity Limitations

Participants may not receive duplicate services if received in previous participation, unless those services are documented in the IEP as a continuation of services. It is the responsibility of the Subrecipient to review past participation to ensure that repeated services are part of the participants goals/objectives on the IEP.

A re-enrolled Participant may receive only one Individual Training Account (ITA) but may receive an On-the-Job (OJT) that is linked to the vocational training provided by the ITA. In some instances, a second ITA may be approved if it will ensure career progression. Training caps must be maintained per individual enrollment period. These are not meant to be life-time caps.

D. OBJECTIVE ASSESMENT

Subrecipients are required to provide an Objective Assessment Summary (OAS) of the academic levels, skills levels, and service needs of each participant, which shall include a review of:

- program expectations,
- educational history and expectations,
- basic skills,
- occupational skills,
- prior work experience,
- employability & work readiness,
- interests,
- aptitudes (including interests and aptitudes for nontraditional jobs),
- supportive service needs and barriers to employment, and
- developmental needs.

The Subrecipient must mark all applicable barriers on the OAS.

The OAS must be conducted after enrollment and prior to providing program services. Subrecipient can use previous basic skills assessment, career interest, and aptitude tests if such previous assessments have been conducted within the past six months. The OAS should not be updated once completed and should correspond to the active WIOA application.

If a participant is dual-enrolled in CalJOBS, the original enrolling service provider is responsible for creating and complete an Objective Assessment Summary within 30 days. The requesting (dual-enrolled) provider may update the OAS as deemed necessary for program assessment and enrollment. There should only be one OAS per WIOA application.

If the participant is re-enrolled, a new OAS must be created that corresponds with the new WIOA application. Any previous OAS should not be updated.

Objective Assessment Process

- On the participation form select the appropriate OAS code as the first activity.
 - Select the begin date as “Today”
 - Select the projected end date as “Today”
- Create and complete an OAS in CalJOBS (Staff Profiles - Case Management Profile – Plan) prior to providing program services - including issuing supportive services and training.
 - *Provide original assessment results for each assessment given (no copies).*
- *Close the OAS activity code and mark the completion status.*
 - *Case note must include the status of the OAS*
- *The OAS must be completed within 30 days of enrollment. If any updates need to be made within the 30 days, additional OAS activity codes must be created and closed on each day the OAS was updated.*

Some sections will pre-fill from the WIOA Application and/or the Participation Form. *Instructions and clarifications for each section and field can be found on the **SDWP website: under “Partner Resources” – CalJOBS Forms and Procedures Handbook.***

E. INDIVIDUAL EMPLOYMENT PLAN (IEP)

The IEP also known as the Individual Service Strategy (ISS) is an age appropriate, individualized, written plan of short and long-term goals that include career pathways, education, training, employment goals, and support services. For all Adult and DW, the IEP will identify the timeframe in which they will be expected to complete all activities related to each of the goal(s) specified in the IEP. The IEP will clearly connect the services to be provided to each participant identifying the outcomes to be achieved between WIOA enrollment and exit. The IEP must demonstrate the participants progress in the program and provide written documentation of how the goals and objectives are tied to the services and activities provided.

An Individual Employment Plan (IEP) must be developed for each participant that:

- Considers career planning and the results of the Objective Assessment Summary;
- Is directly linked to one or more of the indicators of performance; and
- Identifies goals/objectives that include education/training and/or employment goals (including, in appropriate circumstances, nontraditional employment)

The case manager must utilize the IEP to update strategies and activities as they occur. When reviewing the IEP, case managers must document the participant's progress, goals and/or objectives completed, benchmarks reached and any other accomplishments. The IEP must be updated every 3 months, or sooner if necessary, to document any progress made on the goals/objectives or to include a new service or activity.

IEP/ISS Process

- The IEP should be the second activity opened, either concurrently or sequentially with the Objective Assessment Summary.
 - Open an IEP activity code.
 - Select the begin date as "Today." Enter the projected end date as "Today."
- Create and complete an Individual Employment Plan/Service Strategy in CalJOBS (*Staff Profiles - Case Management Profile – Plan*) prior to providing program services - including issuing supportive services and training.
- Close the IEP activity code and mark the completion status.
 - *The case note should include that the participant's goals and objectives were completed in the Individual Employment Plan/Service Strategy section of CalJOBS.*
- Subrecipient must update the IEP every 3 months
 - Open a new IEP Activity Code.
 - Update the IEP in CalJOBS (*Staff Profiles - Case Management Profile – Plan*)
 - Enter the date of the IEP Activity Code on the ISS comment box and provide a summary of the update.
 - Close the open activity on the date the IEP was revised and update the case note.
 - The case note must include the goals/objectives that were added and/or updated.

F. VERRIFICATION OF RIGHT TO WORK

Based on the OAS and IEP, the Subrecipient must determine if the participant will be receiving employment services. Prior to providing any service that triggers coordination with any employer, or any employment related service, the Subrecipient must verify the participant's right to work in the United States and keep the documentation in the participant's case file. Right to work cannot be verified at eligibility, therefore it must be verified during participation. This requirement includes assistance with, but not limited to, paid and on-the-job training, and placement in employment. If no employment services will be provided to the participant, right to work verification is not required.

See table below for guidance on verification of authorization to work documents, including which services require verification.

Authorization to Work Service Flow Chart		
Services	Triggers Participation	Authorization to Work
Basic Career Services: <ul style="list-style-type: none"> • Self-service • Information only activities • Program referrals • Outreach • Intake • Orientation • Eligibility determination 	No	Cannot Verify
Basic Career Services: <ul style="list-style-type: none"> • Staff-Assisted • initial assessment • job placement • career counseling 	Yes	May verify for activities such as initial assessment and career counseling
		Must verify for job placement assistance (referrals to jobs/employers, recruitments etc.)
Individualized Career Services	Yes	May verify for activities such as occupational career counseling, aptitude testing, mentoring, and group counseling
		Must verify for employment activities such as work experience, transitional jobs, internships, and pre-apprenticeship training (referrals to jobs/employers, recruitments etc.)
Training Services	Yes	May verify for classroom training
		Must verify for employment activities (On-the-job training, Customized Training etc.)

For more information on what types of services trigger participation, refer to *SDWP Operations Manual, Chapter 5: CalJOBS Data Entry Policies and Procedures (CalJOBS Activity Code Detailed Listing)*.

Process

- Refer to the I-9 Employment Eligibility Verification <https://www.uscis.gov/i-9> for acceptable right to work documentation.
- Keep a copy of the documentation in the participant’s file. It must include a document from List A or List B and C.
 - The I9 Form is not required
 Enter an attached case note on the first employment service with the title: **“RIGHT TO WORK VERIFICATION”** and include the types of documents collected from either List A or B and C.

G. CAREER SERVICES

Career services for Title III Wagner-Peyser and WIOA Title I Adults and Dislocated Workers must be available in each of the comprehensive AJCC's.

1. Basic Career Services

Basic career services are universally accessible and must be made available to all individuals seeking employment and training services. Generally, these services involve less staff time and involvement and include services such as: eligibility determinations, initial skill assessments, labor exchange services, provision of information on programs and services, and program referrals. These services may be provided by both the Adult and Dislocated Worker programs. At a minimum, all basic career services described below must be made available to all individuals seeking employment services from the AJCC Subrecipient.

These services include:

- Outreach, Intake and orientation;
- Determinations of Adult and DW program eligibility;
- Initial assessment of skill levels including literacy, numeracy and English language proficiency, as well as aptitudes, abilities (including skills gaps) and support service needs;
- Workshops, including orientation to services and other workshops that meet the job seeker's career service's 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, regional labor market information; and
 - Provision of information on nontraditional employment
- Provision of information and referrals to and coordination of activities with other programs and services, including those within the AJCC delivery system and other workforce development programs;
- Provision of information and direct referrals to supportive services or assistance, including:
 - Childcare; child support; medical or child health assistance available through the State's Medicaid program and Children's Health Insurance Program;
 - State programs such as the Supplemental Nutrition Assistance Program (SNAP); earned income tax credits, housing services through the U.S. Department of Housing and Urban Development (HUD); Temporary Assistance for Needy Families (TANF) and other applicable assistance programs
- Provision of performance information and program cost information on eligible providers of training services by program and type of providers via the Eligible Training Provider List and/or other performance criteria set by SDWP;
- Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA; and
- Provision of information and assistance regarding filing claims under Unemployment Insurance (UI) programs, including meaningful assistance to individuals seeking assistance in filing a claim, such as:
 - Where applicable, on-site using staff who are properly trained in UI claims, filing and/or the acceptance of information necessary to file a claim; or
 - 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 meaningful assistance may be paid for by the State's UI program, the WIOA Adult or Dislocated Worker programs, the Wagner-Peyser Employment Service, or some combination thereof these funding sources.

2. Individualized Career Services

Individualized career services must be provided to participants after AJCC staff determine that such services are required to retain or obtain employment. Generally, these services involve significant staff time and customization to each individual's need. Individualized career services include services such as: specialized assessments, developing an individual employment plan, counseling, work experiences (including transitional jobs), etc. AJCC staff may use recent previous interviews, evaluations, or assessments by partner programs to determine if individualized career services would be appropriate. All eligible job seekers must be enrolled in individualized career services if AJCC staff determine that this level of services is necessary for the job seeker to gain meaningful employment. These services must be available in all AJCC locations. Refer to ***SDWP Operations Manual, Chapter 7, Part 1: WIOA Adult and Dislocated Worker Program Eligibility*** for more information regarding adult and dislocated worker eligibility. Individualized Career Services must be designed by each AJCC to meet the unique needs of the job seeker and their region.

These services include:

- Comprehensive and specialized assessments of the skill levels and supportive service needs of eligible 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 (IEP), to identify the employment goals, appropriate achievement objectives and appropriate combination of services for the job seeker to achieve his or her employment goals;
- Group and/or individual counseling and mentoring;
- Career planning (e.g., case management);
- Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare individuals for unsubsidized employment or training, in some instances pre-apprenticeship programs may be considered as short-term pre-vocational services;
- Internships and work experiences that are linked to careers;
- 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, training or employment;
- Financial literacy services;
- English language acquisition and integrated education and training programs.

H. SUPPORTIVE SERVICES

Supportive Services are available for WIOA Title I Adult and Dislocated Worker programs. Supportive services may only be provided to participants when it is necessary to enable individuals to participate in services and is tied to a specific service. Such needs are typically identified through the assessment process and outlined in the Individualized Employment Plan (IEP). Supportive services are payments made to or on behalf of eligible participants for one-time or temporary services required to support the individual's Employment Plan. WIOA Title I will only pay for expenses incurred while a participant is enrolled in the program and actively participating in activities authorized under WIOA.

Supportive Services are not intended to assist in paying for expenses refundable to the participant. All Supportive Services must be approved in advance by the Subrecipient. As a part of the objective assessment process and development of the IEP, determine a participant's need for Support Services and appropriate community resources and referrals. Refer to **ATTACHMENT -SUPPORTIVE SERVICES POLICY AND PROCEDURES** which provides more detailed information regarding SDWP's policy and procedures for administering supportive services. Refer to **SDWP Operations Manual, Chapter 5. CalJOBS Data Entry Policies and Procedures, Attachment – CalJOBS Activity Code Dictionary** for the supportive service definitions.

I. TRAINING SERVICES

Training Services are available for WIOA Title I Adult and Dislocated Worker programs. The training services offered by the Subrecipient provide tools and resources to help participants meet the skill and experience needs of the region's growing businesses. From technical skills, soft skills, work experience, traditional classroom instruction and employer-anchored training services help close the skills gap between participant and businesses.

Under WIOA, training services may be provided if AJCC staff determine after an interview evaluation or assessment and career planning, that the participant is eligible. Refer to **SDWP Operations Manual, Chapter 7, Part 1: WIOA Adult and Dislocated Worker Program Eligibility** for more information regarding adult and dislocated worker eligibility.

1. Eligible Training Providers List (ETPL)

Participants may access training services such as Individual Training Accounts (ITAs) and Apprenticeship Training Accounts (ATAs) through training providers who have met eligibility requirements set by the state in order to be listed on the state-managed Eligible Training Provider List (ETPL). As the local area, San Diego has additional eligibility requirements to ensure the trainings provided are in occupations with regional growth projections and locally sustainable wages, as well as meeting the needs of the region's employers. Participants may access registered apprenticeship programs approved by the Division of Apprenticeship Standards (DAS) that are listed on the State-managed ETPL.

Please note that other local areas may have ETPL policies which vary based on their needs. A training provider interested in serving multiple local areas must review and comply with the ETPL policies of each area where they wish to operate. SDWP does not review or approve providers to operate in areas outside of San Diego. Refer to **ATTACHMENT – ETPL, ITA AND ATA POLICIES AND PROCEDURES** for more information.

2. Individual Training Accounts (ITAs)

ITAs are designed to provide traditional classroom training services to participants who need training that prepares them for employment in-demand and/or higher in-demand occupations in

the San Diego region. Refer to [ATTACHMENT – ETPL, ITA AND ATA POLICIES AND PROCEDURES](#) for more information.

3. Apprenticeship Training Accounts (ATAs)

ATA is a formalized, structured training program that combines on-the-job learning with related practical and technical classroom instruction in a highly skilled occupation. Funding may be used to reimburse apprenticeship programs for the classroom training. Although apprenticeship programs involve on-the-job training, ATAs may not be used to subsidize job seeker wages. The length of the apprenticeship training will vary by occupation. The apprentice is hired as an employee and earns wages once accepted into the program. Refer to [ATTACHMENT – ETPL, ITA AND ATA POLICIES AND PROCEDURES](#) for more information.

4. On-the-Job Training (OJT)

OJT is a strategic employment service that supports the business community in their hiring process by adding staff capacity, productivity and training at reduced costs to the Employer and is an excellent vehicle for participants to build their skills and re-establish their employment status. OJT benefits Employers by reducing the cost of training new employees, the Employer designs the on-site training, training is aligned with the skills required for the job and is a long-term investment in the company. OJT benefits the participant by providing an opportunity to “earn as they learn” in a hands-on environment, acquire job and career advancement skills, and provides an opportunity for long-term employment. Refer to [ATTACHMENT – OJT POLICY AND PROCEDURES](#) for more information.

5. Customized Training (CT)

CTs are designed to meet the specific skill needs of an employer or a group of employers. This type of training typically includes a commitment from the employer to share costs with the training provider and to hire some or all of the successful completers of the training program. CTs are partnerships between employers and Subrecipient which perform critical tasks like managing and convening the partnership, doing recruitment, performing assessment and intake, and providing linkages to supportive services. Refer to [ATTACHMENT - CUSTOMIZED TRAINING AND CONTRACTED EDUCATION TRAINING POLICIES AND PROCEDURES](#) for more information.

6. Contracted Education Training (CET)

Adult and dislocated training funds may be used to contract directly to institutions of higher education or eligible training providers, under certain conditions. SDWP may award a contract to an institution of higher education or other eligible training provider if determined that it would facilitate the training of multiple individuals in high-demand occupations, and if such contract does not limit job seeker choice. Direct contracts with institutions of higher learning or eligible training providers allow to quickly design training to fit the needs of both participants and employers. Refer to [ATTACHMENT - CUSTOMIZED TRAINING AND CONTRACTED EDUCATION TRAINING POLICIES AND PROCEDURES](#) for more information.

J. FOLLOW-UP SERVICES

Subrecipient must provide follow-up services for adults and dislocated worker participants 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. For more information on follow-up services - refer to the Follow Up Services section under Case Management.

IV. CASE MANAGEMENT

Case Management is the infrastructure for delivering effective services that will facilitate growth and development and the achievement of performance goals. The process extends from recruitment through follow-up. The case manager motivates participants and coordinates services and information to prepare participants for employment and training opportunities as appropriate.

A. DURATION IN PROGRAM

Subrecipients must provide service to a participant for the amount of time necessary to ensure successful preparation to enter training and/or unsubsidized employment. While there is no minimum or maximum time a participant can participate in the WIOA Adult and Dislocated Worker program, programs must link participation to the individual employment plan and not the timing of Subrecipient contracts or program years.

B. ACTIVE & CONSISTANT ENGAGEMENT WITH PARTICIPANT

Subrecipients should engage participant on a regular basis, building a relationship and helping them progress towards their goals. 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 and the Subrecipient can no longer provide many of the WIOA services the participant still may need to complete IEP, leading to negative WIOA performance outcomes.

1. IEP Updates

Subrecipient must update the IEP every 3 months, or sooner if necessary, to document any progress made on the goals/objectives or to include a new service or activity.

2. Unresponsive, Unable to locate, or elect to no longer Participate

If a participant is unresponsive, or the is unable to contact or locate the participant, the participant must be exited prior to the system closing after a 90-day period with no services provided with an attached case note on the closure form explaining the circumstance. Service activities cannot be provided to a participant who is unresponsive, or unable to contact or locate.

If a participant elects to no longer participate, they must be immediately exited with an attached case note on the closure form explaining the circumstance. No additional service activities can be provided.

The Subrecipient is still accountable for the performance measures and must complete all follow-up procedures as outlines in the follow-up policy.

C. PARTICIPANT FILE CONTENT

Subrecipient must maintain a participant file on each registered Adult or DW. At a minimum, the file must contain eligibility, program and closure documentation.

Note: Any documentation with medical info, including disclosure and documentation of a disability, should be properly noted in CalJOBS and kept in a separate, secure file. Any medical or disability information cannot be kept in the participants file.

1. Intake Documentation

The following is required:

Refer to ***SDWP Operations Manual, Chapter 7, Part 1: WIOA Adult and Dislocated Worker Program Eligibility***

- Eligibility Certification Review Form (ECRF);

- Eligibility documentation and forms as applicable;
- Dual-enrollment form, if applicable;
- Universal Participant Authorization Form (UPAF); and
- Multimedia Release and Communications Release Form.

2. Program Documentation

The following is required:

- Assessment Results
- Training Documentation ITA, ATA or OJT, if applicable
- **EXHIBIT – SUPPORTIVE SERVICES LOG & RECEIPT FORM**, if applicable

3. Closure Documentation

The following is required, if applicable

- **ATTACHMENT - PROGRESS REPORT FORM**; and
- Performance related documentation

D. DUAL AND CO-ENROLLMENTS

1. Co-Enrollments

Subrecipients may choose, at the benefit of the participant, to enroll them in more than one program to access a wide range of services. Co-Enrollment would be enrollment into more-than-one of the four core programs and/or enrollment by a single service provider into multiple SDWP funded programs:

- WIOA Title I: Adult, Dislocated Workers and Youth
- WIOA Title II: Adult Education and Literacy
- WIOA Title III: Wagner-Peyser
- WIOA Title IV: Vocational Rehabilitation
- SDWP-funded special projects

SDWP encourages the Subrecipients to leverage resources, including using co-enrollment, to ensure participant success.

2. Dual-Enrollments

Eligible participants may be dual-enrolled into two or more WIOA Title I programs and/or enrollment by two different subrecipients into programs funded by SDWP. Dual-enrollment will allow participants to access a wider array of services that might otherwise be unavailable. Subrecipients should seek to dual-enroll for the benefit of the participant with services from other programs that supplement and/or enhance those services not to duplicate them.

a) Dual-Enrollment Coordination

Subrecipient coordination of dual-enrollment will eliminate the duplication of services and reduce the amount of time staff spends providing intensive services such as case management, job search assistance, and follow-up services.

- Determine at intake whether or not a participant is already enrolled in another program or has been referred to your program specifically for dual-enrollment.
 - *If a participant is enrolled in another WIOA program, dual-enrollment will first be discussed with the original provider prior to seeking approval from SDWP. All information regarding the dual-enrollment will be documented in CalJOBS.*
 - *Both the original provider and requesting provider should make every effort to coordinate dual-enrollment without creating additional barriers for the participant.*

- *Only one WIOA application can be active in CalJOBS*
- Both the original provider and the requesting provider will discuss which services will be provided by each to avoid duplication of services and discuss the reason(s) for the dual-enrollment.
- The subrecipient requesting the dual-enrollment (requesting service provider) will follow the following Dual-Enrollment process:

b) *Dual-Enrollment Limitations*

The following Participants do not qualify for dual-enrollment:

- Participants with a Closure Form, or
- Participants who have Exited, or
- Participants receiving Follow-up Services, or
- Participants who have completed Follow-up Services.

Dual-Enrollment Process

- The requesting service provider will submit **ATTACHMENT - REQUEST FOR DUAL-ENROLLMENT** to their Program Specialist and keep in the participant file, once approved.
 - The requesting service provider will conduct initial eligibility for their program.
 - Every effort should be made to use eligibility documentation from the original provider.
- Once approved, the requesting service provider will update the WIOA application in CalJOBS complete a Participation Form for their program.
 - There must be one Participation Form for each funding source.
 - On the participation form select the appropriate OAS code as the first activity.
 - Under the OAS activity code, the requesting provider should document that the OAS has been completed by the original service provider and they have coordinated a dual-enrollment to address barriers noted on the OAS.
 - Open and close that activity on the same day.
- Open a new ISS/IEP Activity Code.
 - Update the ISS/IEP with the information from the **ATTACHMENT - REQUEST FOR DUAL-ENROLLMENT**, including which services will be provided by each Subrecipient under their specific goals/objectives.
 - Open and close the activity on the same day.
- The requesting service provider must provide a copy of the approved the **ATTACHMENT - REQUEST FOR DUAL-ENROLLMENT** form to the original service provider. The original service provider must keep a copy of the form in the participant file.

Refer to OAS and IEP for more information on the requirements for each, unless otherwise noted in this section.

c) *Dual-Enrollment Accountability and Performance*

Both Subrecipients will be accountable for their own contractual obligations and performance measures.

- Each enrollment counts towards the enrollment goals of the individual grant.
- Exit decisions must be coordinated, only one Service Provider can be the “exiting” agency.
- Performance measures will count towards both the original provider and the requesting provider.
 - Normally, a dual-enrolled Participant may receive only one Individual Training Account (ITA) but may receive an On-the-Job (OJT) that is linked to the

vocational training provided by the ITA. In some instances, a second ITA may be approved if it will ensure career progression. Training caps must be maintained per individual enrollment period. These are not meant to be life-time caps.

- Follow-up activities and services will be coordinated between both Service Providers.

E. PROGRAM CLOSURE

Subrecipients must complete a closure form in CalJOBS once a participant has completed their goals and objectives on the IEP and all program activities. The closure form must detail the outcomes during participation on an attached case note, including a summary of the outcomes their IEP. The case notes must also describe the plan for transitioning from an active participant to a follow up participant, including any planned continuation of services in follow up.

As a case management strategy, the participant should not be aware they are transitioning between an active participant and a follow up participant. Subrecipient should make every effort to continue active and consistent engagement with the participant.

F. FOLLOW-UP SERVICES

Follow up services are critical services provided following a participant exit from the program to help ensure the participant is successful in employment and training. Follow up services may include regular contact with the participant's employer, including assistance in addressing work-related problems that arise.

Follow up services will begin immediately following the last expected date of service in the WIOA Adult/DW program. Follow up services do not cause the exit date to change and does not trigger re-enrollment in the program.

Follow up services may include services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services. Refer to **Chapter 5. Attachment - CalJOBS Activity Code Dictionary to select the most appropriate F-Code.**

The types of services provided, and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant. For follow-up service activities, the same documentation applicable for activities is required for both the participant file and on CalJOBS, including applicable case notes. Case notes are not required in follow-up forms unless more information is needed to document performance outcomes.

1. Follow-Up Requirements

All participants must be offered an opportunity to receive follow-up services that align with their individual employment plan. Furthermore, follow-up services must be offered to all participants for a minimum of 12 months (365 days from the exit date). To record follow up services, CalJOBS require Subrecipients to enter outcomes into follow-up form on a quarterly basis.

Follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome. If a participant cannot be contacted or located, all contact attempts must be documented in the follow-up form with an attached case note. The service provider should continue to attempt to contact the individual in each follow up reporting period.

If a participant refuses additional services or asks to no longer participate, document the contact in the quarterly reporting period follow-up form with an attached case note explaining the participant is refusing follow-up services and requests to no longer participate. The service provider should not attempt to contact the individual if they no longer elect to participate.

Participants who have had an exclusionary exit or elect to no longer participate do not require follow up services and the follow up forms should not be completed.

2. Follow Up Documentation

The types of services provided and the duration of services must be determined based on the needs of the individual and therefore, the type and intensity of follow-up services may differ for each participant. For follow-up service activities, the same documentation applicable for activities is required for both the participant file and on CalJOBS, including applicable case notes.

Case notes must be completed on the follow up forms to document additional information captured during the quarter.

V. PERFORMANCE

The Workforce Innovation and Opportunity Act (WIOA) requires a comprehensive accountability system to determine the effectiveness of services provided through the AJCC Subrecipient. Performance requirements are specifically called out in the Subrecipient contract. Refer to **Subrecipient Contract - Attachment - Program Performance Measures**.

A. DEFINITION

Definitions needed to understand WIOA performance and the mechanisms for calculation the six primary indicators of performance, including definitions, are found in [WSD19-03](#), "Performance Guidance." The six indicators of performance include:

- Employment (Placement) Rate – 2nd Quarter After Exit
- Employment (Placement) Rate – 4th Quarter After Exit
- Median Earnings – 2nd Quarter After Exit
- Credential Attainment
- Measurable Skill Gains
- Effectiveness in Serving Employers

B. EMPLOYMENT (PLACEMENT)

Employment placement includes participants who are found to be employed OR found to be in unsubsidized employment during the second quarter after program exit. All participants included in this indicator (excluding those that exited with an exclusionary exit, regardless of employment status at program entry. The following placements received during the report period will count towards the program performance measures:

1. Placement in Employment

Participants who are in unsubsidized employment.

Documentation of Employment (Placement)

- Complete the follow up form for the quarterly reporting period. The follow up form must include wage information doe placement in employment.

C. MEDIAN EARNINGS

The median earning of program participants who are in unsubsidized employment during the second quarter after program exit.

The following participants are excluded from the median earnings performance indicator:

- Participants who have exited and are not employed in the second quarter after exit.
- Participants who have exited a program and for whom earnings information is not yet available.
- Participants who have exited from a program and who have \$0 income in the 2nd quarter after exit.
- Participants who have exited and are in subsidized employment.
- Participants who have exited with an exclusionary exit.

Documentation of Median Earnings

- Complete the follow up form for the quarterly reporting period. The follow up form must include wage information for placement in employment.

D. CREDENTIAL ATTAINMENT

Credential attainment is the number of participants enrolled in an education or training program (excluding On-the-Job Training [OJT] or customized training) who attain a recognized postsecondary credential, during participation or within one year of program exit. Characteristics of a quality industry-recognized credential:

- Accessible — Affordable and readily available at places and times convenient for working adults;
- Transparent — Clearly articulated costs and prerequisites; accurate picture of what skills, knowledge and abilities are benchmarked by a given credential, and the value it carries in the labor market;
- Stackable — One of multiple manageable chunks that add up to a more substantial credential and do not require starting over at each new step;
- Portable — Transferable between firms, regions and educational institutions;
- Meaningful — Has value in the labor market; and
- Connected — Links to a job or an educational pathway

1. Post-Secondary Credential

An industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State or Federal government, or an Associate or bachelor's degree. A recognized postsecondary credential is based on the attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation. These technical or industry/occupational skills are generally based on standards developed or endorsed by employers or industry associations.

The following are types of recognized postsecondary credentials:

- Associate degree.
- Bachelor's degree.
- Occupational licensure (e.g. Certified Nursing Assistant license).
- Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates.
- Occupational certification (e.g. Automotive Service Excellence certification).
- Other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

Examples that DO meet the postsecondary credential definition include the following:

- An automotive service excellence (ASE) certification.
- A crane operator certificate.
- A certified nurse assistant (CAN) license.

a) **Credential Verification**

Subrecipient must access EDD's Labor Market Information Occupational Guides before determining if a credential and/or occupational certificate qualifies under the Credential Attainment indicator. Using LMID's Occupation Data tool at labormarketinfo.edd.ca.gov, an individual can research an industry and identify if a credential is required for employment. If a credential is required for employment, then that credential will often qualify for the credential attainment indicator.

Examples that **DO** meet the postsecondary credential definition include the following:

- An automotive service excellence (ASE) certification.
- A crane operator certification.
- A certified nursing assistant (CNA) license.

Process for Credential Verification

- Identify occupation of interest (ex: Emergency Medical Technician [EMT]).
- Using the Occupation Data tool provided on labormarketinfo.edd.ca.gov, research this occupation's profile.
- Determine if this occupation requires a license, identify the title of the license, and the necessary skills to obtain the license.
- Required license title (e.g., Emergency Medical Technician License)
- Review skills listed to obtain license (ex: Managing respiratory, trauma, and cardiac emergencies, and patient assessment. Time in an emergency room or ambulance dealing with bleeding, fractures, airway obstruction, cardiac arrest, and emergency childbirth. Use and maintain common emergency equipment, such as backboards, suction devices, splints, oxygen delivery systems, and stretchers.)

Documentation of Credential Attainment

- A copy of the degree, certificate, or credential must be kept in the participant's file.

NOTE: WHEN DOCUMENTING THE ATTAINMENT OF A DEGREE, CERTIFICATE, OR CREDENTIAL ATTAINMENT, use the actual date of attainment and not the date the documentation was received. If there is a delay in receiving the documentation, note the reason for the delay and the approximate expected date you plan on receiving the documentation in a CalJOBS case note. When the documentation is received, include it in the participant's case file and update the case note with the date it was received.

2. Credential Attainment limitation

Certificates awarded by Local Workforce Development Boards and work readiness certificates are not considered postsecondary credentials because neither type of certificate is recognized industry-wide, nor documents the measurable technical or industry/occupational skills necessary to gain employment or advancement within an occupation. Certificates/credentials that provide general skills related to safety, hygiene, etc., even if such general skills are broadly required to qualify for entry-level employment or advancement in employment, are not considered postsecondary certificates/credentials.

The successful completion of a training program does not mean a credential was attained. The participant must have completed the training, fulfilled all of the requirements to receive the credential (e.g. passage of credential exam), and provide credential verification.

The following are examples of credentials/certificates that are NOT recognized postsecondary credentials:

- Occupational Safety and Health Administration 10-hour course on job-related common safety and health hazards (OSHA 10).
- Microsoft Office, Customer Service, and/or General Office.
- National Career Readiness Certification.
- National Retail Federation Credentials.
- ServSafe Food Handler's Certification.
- Cardiopulmonary Resuscitation (CPR) Certification.

E. MEASURABLE SKILLS GAIN (MSG)

MSGs track a participant's interim progress. Therefore, it is intended to capture important education or training progressions based upon "real time." It is NOT an exit-based performance indicator. This enables subrecipients to track and report progress and performance for participants while they are in the program.

For the MSG performance indicator, a new period of participation is counted each time a participant enrolls into a training/education program. A participant is included in the performance indicator even if they are enrolled late in the PY. Local Areas must not delay enrollment or services to participants. If the period of participation spans over multiple PYs, a new MSG must be calculated for each PY the participant is enrolled in an education or training program.

Subrecipients are required to document MSGs during the PY (July 1 – June 30) that a participant is enrolled in education or training, regardless if the participant exits in the same PY. An MSG can be added after exit, and if applicable, may be counted toward the previous PY. This requirement applies to each PY the participant is enrolled in an education or training program.

The five MSG measures require documentation contingent upon the type of training or education for which the participant is enrolled. Participants may fall into one or more of the measures. If a participant falls into more than one MSG measure, subrecipient staff have the flexibility to choose which measure to report; however, the type of skill gain for participants must be based on the Participant's individual. Subrecipients can report on all MSG measures, but only the most recent MSG per PY will be factored into the performance measure. The five MSG measures, and their corresponding documentation are as follows:

1. MSG Measures and Documentation

- 1) Educational Functioning Level: Achievement of at least one educational functioning level for a participant receiving instruction below the postsecondary level.
 - Compare educational functioning levels using a pre-test and post-test.
 - Pre-tests may be provided up to six months prior to program entry.
 - The date of post-test must be within the PY and must be before the program exit date.
 - Earned credits from an adult high school program that leads to a secondary school diploma or recognized equivalent.
 - Subrecipient must work with the local school districts to determine what constitutes as an "earned credit."

- Exits program at the secondary level and enrolls in postsecondary education or training during the PY.
- 2) Secondary School Diploma: Achievement of a secondary school diploma, or its recognized equivalent.
 - 3) Transcript/Report Card: Secondary or postsecondary transcript or report card that documents the participant is meeting the state's academic standards outlined by the [CDE](#).
 - Enrolled in secondary education: transcript or report card for one semester meeting the State's academic standards.
 - Enrolled in postsecondary education: transcript or report card showing a completion of a minimum of 12 hours per semester, or for part-time students a total of at least 12 credit hours over two completed consecutive semesters during the PY, and showing that the participant is meeting the State's academic standards
 - 4) Progress Towards Established Milestones: A satisfactory or better score/evaluation on a training or progress report from the employer, or training documenting progress of meeting established benchmarks (e.g.: an employer/training provider documents a participant's completion of an apprenticeship milestone).
 - Progress report showing the attainment of an established milestone from an employer or training provider within the reporting period.
 - Documentation may vary as subrecipients should identify appropriate methodologies based up on the nature of services being provided, but the progress reports must document substantive skill development the participant has achieved.
 - 5) Skills Progression (Passage of an Exam): Successful passage of a knowledge-based exam that is required to document progression of trade or training-related benchmarks.
 - 6) Measurable skills gain entered into CalJOBS and **ATTACHMENT - PROGRESS REPORT FORM**

Documentation of MSG

- Completed Measurable Skills Gain or Educational Functioning Level in CalJOBS; and
- Required documentation of the MSG as indicated above for the type of education or training related goals/objectives on the IEP must be kept in the participant's file.

2. MSG Limitations

Certificates/credentials used for Credential attainment may not be used to document an MSG.

F. EFFECTIVENESS OF SERVING EMPLOYERS

There are two Effectiveness in Serving Employer measures. SDWP will report on the following two measures, as required by EDD and DOL:

1. Retention with the Same Employer

Participants who are employed by the same employer (verified by State tax ID number or FEIN) in both the second and fourth quarters after exit. As part of the placement in employment for each reporting period, wage information is required to verify employment.

2. Repeat Business Customers

Tracks the percentage of employers who have used program services in the current PY and had received services in any of the three preceding PYs. This allows the State to determine if

business customers are sufficiently satisfied to seek core program services again, and to develop and maintain durable employer relationships.

G. EXCLUSIONARY EXITS

Participants can be excluded from the Performance Measures, at the time of closure, for any of the following Global Exclusions that precludes the participant from entering into employment or participating in services:

- **Institutionalized:** The participant exits the program because he or she has become incarcerated in a correctional institution or has become a resident of an institution or facility providing 24-hour support such as a hospital or treatment center during receiving services as a participant.
- **Health/Medical:** The participant exits the program because of a medical treatment and that treatment is expected to last longer than 90 days and precludes entry into unsubsidized employment or continued participation in the program.
 - Pregnancy/birth does not meet the definition of an exclusionary exit unless complications from the pregnancy/birth causes treatment that lasts longer than 90 days.
- **Deceased:** The participant is deceased.
- **Reservist called to Active Duty:** The participant exits the program because the participant is a member of the National Guard or other reserve military unit of the armed forces and is called to active duty for at least 90 days.
- **Relocated to a Mandated Program:** The participant is in the foster care system as defined in 45 CFR 1355.20(a), and exits the program because the participant has moved from the local workforce area as part of such a program or system.

Note: Exclusionary exits that are entered before the closure form is completed will exclude the participant from performance outcomes, however, if a participant is already in follow-up when any of the aforementioned circumstances occur, the participant will still be included in performance measures.

1. Medical Exclusionary Exits

If a participant is exited due to an exclusionary/neutral exit and it's because of medical or disability collect information in separate file and do not disclose in case notes the reason for exit.

The 2 out of 5 exclusionary/neutral exit reasons that could disclose medical or disability-related information:

- Health/medical issues
- Residing in an institution or facility providing 24-hour support, such as prison or hospital

H. PERFORMANCE REPORTING

Subrecipient will be required to report on the six indicators of performance on a quarterly basis. Refer to ***SDWP Operations Manual, Chapter 5: CalJOBS Data Entry Policies & Procedures*** for more information.

VI. CORRECTIVE ACTION

The subrecipient is expected to work closely with SDWP to meet and exceed federal, state, and local performance measures in order to provide high quality services and outcomes to our participants. This corrective action policy covers all contracted subrecipients serving participants with funds from the San Diego Workforce Partnership (SDWP). This policy outlines the procedures for corrective action and details the manner in which SDWP staff and subrecipients will address program performance, financial reporting, and monitoring deficiencies.

Corrective action will be taken when a contracted subrecipient fails to meet compliance or performance in any of the following areas:

<ul style="list-style-type: none">• Achieving performance measures or milestones as outlined in the scope of work and/or fidelity to the program design as outlined in the subrecipient's proposal
<ul style="list-style-type: none">• Significant monitoring findings and/or not working to address and/or close findings in a timely manner
<ul style="list-style-type: none">• Underspending contract amount against planned budget/trend
<ul style="list-style-type: none">• Mismanagement of contract which impacts SDWP performance standards, expenditure rates, employer relations and/or customer service
<ul style="list-style-type: none">• Other violation of the legislative, regulatory, legal, and other contractual requirements

Please note that the above measures, and their respective performance standards, are subject to change based on federal, state, and local laws, policies, and SDWP and subrecipient negotiated contract changes.

A. PERFORMANCE MONITORING

SDWP will monitor the performance of the subrecipient throughout the program year using:

- 1) Data reporting from the program's system of record
- 2) Monitoring reports
- 3) Financial reports from SDWP's finance team; and
- 4) Other program reporting requirements as specified in contract and/or requested by SDWP.

It is the responsibility of the subrecipient to ensure all staff involved in the service delivery and program management are properly trained to perform the tasks outlined in their scope of work. SDWP will provide technical assistance, as needed.

B. PERFORMANCE MEASURES

Refer to [Subrecipient Contract - Attachment C](#) for the approved Program Performance Measures.

C. CORRECTIVE ACTION PROCESS

The following outlines the progressive manner in which SDWP staff and subrecipients will address performance deficiencies.

1. If an area of deficiency in contract compliance or performance is identified, SDWP will send a corrective action letter noting the area(s) of deficiency to the subrecipient's Executive Director or equivalent position.
2. The subrecipient is required to provide a response to the SDWP within five (5) business days of the issuance of the corrective action letter and complete the following:

- a. Submit an **ATTACHMENT - CORRECTIVE ACTION PLAN** and provide progress updates on plan, on frequency designated by SDWP
 - b. Meet with the Program Specialist to discuss corrective action and any necessary technical assistance, on frequency designated by SDWP
3. It is the responsibility of the subrecipient to address and resolve performance and contract compliance issues. SDWP will work with the subrecipient to provide identified technical assistance and/or capacity building needs to ensure the delivery of high-quality services to participants.
 4. Once a corrective action letter has been issued, the deficiency will be reviewed by the Program Specialist, on a frequency selected by SDWP, to determine if the issue has been resolved by the end of the period specified in the **ATTACHMENT - CORRECTIVE ACTION PLAN**.
 5. When/if SDWP staff have verified the corrective action, plan has been carried out and the subrecipient has corrected the contract underperformance, SDWP staff will notify subrecipient it is no longer on corrective action.
 6. If the deficiency(ies) is not satisfactorily rectified, subrecipients shall be subject to one or more of the following actions:
 - a. The corrective action may be continued for an additional time period depending upon the circumstances of the deficiency and ability to resolve the issue promptly, as determined by the SDWP; or
 - b. Subrecipients with outstanding or unresolved Corrective Action Plans may face one or more of the following consequences:
 - Subrecipient may not be considered for continued funding, or an extension of their contract from SDWP;
 - Subrecipient may be subject to a de-obligation of funds;
 - Subrecipient may be considered ineligible for funding in future procurements, for a specified time period, from SDWP; and/or
 - Subrecipient may be subject to a termination of contract.
 7. If it is determined that a de-obligation of funds or a termination of contract is warranted, this recommendation will be brought forward at an action item to SDWP's board and relevant committee(s). Written notification will be sent to the subrecipients Signature Authority informing them of such action.

VII. SDWP SPECIAL PROJECTS

SDWP receives funding to provide services using WIOA formula funds *and* special grant funds from public or private sources. Subrecipients will be required to provided services and work collaboratively with other providers to ensure quality delivery for all special grant programs and initiatives as requested by SDWP. Refer to *section XII, Special Projects Attachments* for policies and procedures.

A. ATTACHMENTS (SPECIAL PROJECTS)

ESE Policy and Procedures
 Reentry Policy and Procedures
 CalFresh Policy and Procedures

VIII. ATTACHMENTS (WIOA)

Adult and Dislocated Worker Participant File Monitoring Checklist

Quarterly Narrative Report

Request for Dual-Enrollment Policy

Supportive Services Policy and Procedures

ETPL, ITA and ATA Policies and Procedures

On-the-Job Training Policy and Procedures

Customized Training and Contracted Education Training Policies and Procedures

Progress Report Form

Corrective Action Plan