



San Diego  
**Workforce**  
Partnership

## REENTRY WORKS SAN DIEGO PROGRAM

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## I. INTRODUCTION

Reentry Works Program is an overall strategy to invest and innovate in, evidence-based solutions to best serve the justice-involved population. The purpose of Reentry Works Program, is to provide Justice-involved individuals with pre-release employment and training services while strengthening links to jobs and post-release employment services, earn and learn opportunities and community-based resources.

### A. BACKGROUND

As part of the 2018 state budget process, the California Legislature approved—and signed by Governor Brown—legislation which established the Prison to Employment Initiative. The 2018 state budget included \$37 million over three budget years to fund the integration of workforce and reentry services. The first portion of these funds—Regional Planning Grants—was awarded in October 2018. The Workforce Partnership submitted and application on behalf of the Southern Border Region (SBR) and the California Workforce Development Board (CWDB) awarded the SBR P2E grant funds.

The Imperial County Workforce Development Board serves the justice-involved population through its El Centro center providing job-readiness and job search training, workshops and case management to those individuals remaining in Imperial County. For those individuals leaving the area, we anticipate providing a comprehensive package upon release to support them at their destination.

### B. PERFORMANCE MANAGEMENT

SBR requires a comprehensive accountability system to determine the effectiveness of services. The subrecipient will work closely with SBR to implement performance measures and attain the prescribed standards for the delivery of services. At a minimum, the subrecipients will be accountable for the following measures:

1. **Pre-release individuals served at East Mesa Rehabilitation Facility (EMRF)/Las Colinas Detention and Reentry Facility (LCDRF):** The goal is to serve all participants referred by the San Diego Sheriff's Department with a value-added service. Value added services will be reported for tracking and invoicing purposes and not as a performance measure.  
\* Due to COVID-19, pre-release services have been put on hold. Measures will only be tracked once access to facilities are reinstated.
2. **Enrollments into post-release services:** 100% of planned participants will be enrolled in services.
3. **Training completions:** 70% of participants will complete training.
4. **Credential attainment:** 80% of individuals placed in training will receive a credential.
5. **Entered employment:** 75% of participants will be placed in employment.
6. **Employment retention:** 60% of participants will retain employment during 1st, 2nd and 4th quarter follow up.
7. **Average Wage** will be used for tracking and not implemented as a performance measure.
8. **Recidivism** is not a performance measure, however, will be considered for tracking purposes.

The California Workforce Development Board, EDD, and/or SBR may review and revise the performance criteria.

## C. PERFORMANCE MONITORING

Workforce Partnership will monitor the performance of the subrecipient throughout the program year using:

- 1) Data reporting from the program's system of record (CalJOBS)
- 2) Documents and requirements listed on the **ATTACHMENT – P2E ELIGIBILITY CERTIFICATION AND REVIEW FORM (ECRF)**
- 3) Monitoring reports
- 4) Financial reports from Workforce Partnership finance team; and
- 5) Other program reporting requirements as specified in contract and/or requested by Workforce Partnership.

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. Workforce Partnership will provide technical assistance, as needed.

## 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. Workforce Services must be accessible to the targeted population. This includes workforce centers being inside the jails and transportation accessible to workforce centers outside of the jails.

### B. PARTNERSHIPS

Subrecipients are expected to demonstrate local partnerships and collaborations with partnering programs such as the Workforce Innovative Opportunity Act (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
- Other Community Based Organizations
- Local and State Government Agencies (i.e., San Diego County Sheriff Dept.)
- Outreach, Recruitment & Orientation
  - Outreach and recruitment include, but is not limited to:
    - identifying potentially eligible program participants by working with partners and community-based organizations,
    - Participating in monthly local and regional (Southern Border Region) Parole And Community Team (PACT) meetings.
    - Local community forums and committee meetings

As part of orientation, all participants should be provided information regarding other applicable and appropriate services available through other local programs that have capacity to serve them.

### C. 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 Workforce Partnership.

Subrecipient shall be required to submit **ATTACHMENT - MONTHLY INVOICE**. Reference Chapter 6 in Workforce Partnership Operations Manual for guidance on invoicing.

Additional program information will be collected through the **QUARTERLY NARRATIVE REPORT** process documenting progress and/or obstacles and provide additional requests for technical assistance. Subrecipient should note the below reporting requirements:

- Reports are due on a quarterly basis and submitted to the Program Specialist.
- All reports (and supporting documentation) **must be submitted on time and will be due on the 3<sup>rd</sup> of the month following the end of the quarter.**
- Reports will require information about both program and fiscal.

Refer to Workforce Partnership's Operations Manual, Chapter 5 for guidance on data entry policies and procedures specifically for the California Job Openings Browse System (CalJOBS).

## III. PROGRAM SERVICES

### A. PRE-RELEASE AND POST-RELEASE SERVICES

All job seekers must be determined eligible and enrolled in program services. These services include but are not limited to:

1. Intake and orientation;
2. Determinations of program eligibility;
3. Comprehensive and specialized assessments of the skill levels and supportive service needs of eligible adults and dislocated workers, which may include:
  - a. Diagnostic testing and use of other assessment tools; and
  - b. In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
4. 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;
5. Group and/or individual counseling and mentoring;
6. Career planning (e.g., case management);
7. 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;
8. Earn and learn, Internships, apprenticeships and work experiences that are linked to careers;
9. 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;

10. Financial literacy services;
11. English language acquisition and integrated education and training programs if needed.
12. Provision of on-site facility employment seminars, job fairs and recruitments will be accessible to participants;
13. Provision of information and referrals to and coordination of activities with other programs and services, including other workforce development programs;
14. Provision of information and direct referrals to supportive services or assistance, including:
  - a. Childcare; child support; medical or child health assistance available through the State's Medicaid program and Children's Health Insurance Program;
  - b. 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

Refer to **TEGL 16-16 and TEGL 19-16** for clarifications on definitions and examples of qualifying activities under each category.

## B. SUPPORTIVE SERVICE / EARN AND LEARN ACTIVITIES

Subrecipient will be expected to provide supportive services and earn and learn activities to any participants in need. "Supportive services" are defined in Section 14040(e) of the Unemployment Insurance Code as services that are necessary to enable an individual to successfully participate in, or receive, workforce, education, and other related services authorized under Section 1234.4(c) of the Penal Code, Section 14035 of the Unemployment Insurance Code, as well as the federal Workforce Innovation and Opportunity Act and its corresponding regulations.

The term "supportive services" includes services such as transportation, childcare, housing, and needs related payments that are necessary to enable an individual to participate in activities that lead to employment. "Earn and learn" is defined in Section 14040(a) of the Unemployment Insurance Code as the same meaning as in Section 14005(q) of the Unemployment Insurance Code. As defined, "Earn and learn" includes, but is not limited to, a program that does either of the following:

- Combines applied learning in a workplace setting with compensation allowing workers or students to gain work experience and secure a wage as they develop skills and competencies directly relevant to the occupation or career for which they are preparing.
- Brings together classroom instruction with on-the-job training to combine both formal instruction and actual paid work experience.

On-the-Job Training (OJT) is a type of earn and learn activity that is provided by an employer to a participant (job seeker). During the training, the customer is engaged in productive work in a job for which the customer is paid and the training provides the knowledge or skills essential to the full and adequate performance of the job. OJT may be provided by an employer in the public, private non-profit or private sectors. It will be a part of the service providers responsibility to provide OJT opportunities to justice-involved participants and expend funds allocated to subsidized wages.

Refer to Workforce Partnership's [Operations Manual, Chapter 4 Part 1: Adult and Dislocated Workers Program Activities](#) for guidance on OJT policies and procedures.

## C. SUPPORTIVE SERVICES AND PAYMENT PROCEDURES

Subrecipients must log all inventory of purchased supportive services items and track what has been distributed to all participants. Workforce Partnership will not reimburse Subrecipients for any unused inventory. These logs are subject to monitoring and file review. Failure to comply with this requirement will result in corrective action and/or disallowed costs. Subrecipient is required to comply with their internal supportive services policy for their program(s). The supportive services policy must be submitted to and approved by your assigned Program Specialist through Workforce Partnership.

### 1. Approved Support Services

- Child/Dependent Care
- Transportation Assistance
- Temporary Shelter
- Tools/Clothing
- Housing Assistance
- Educational Testing
- Post-Secondary Academic Materials
- Seminar/Workshop Allowance
- Job Search Allowance
- Training Allowance
- Other

### 2. Referral for Supportive Service Process

- The participant is referred for support services by their case manager.
- Open a new IEP Activity Code
  - At minimum, the activity case note must include the following information:
    - Type of supportive service requested
    - Amount of supportive service and how it was calculated
    - Type of Activity for which supportive services will be used
- Provide the following documentation for the participant's file:
  - Copy of check, gift card or other type of card with serial number visible, if applicable

## D. STIPENDS

Stipends are defined as fixed regular small payments made to a participant during their enrollment to encourage program participation. Stipends may be paid based on actual hours of attendance and participation. Attendance and participation in the activity should be documented as a basis of stipend payment. The employer of record must adhere to all labor laws. For more information see the following website: <https://www.dir.ca.gov/dlse/dlseLaws.html>.

Subrecipient may develop a stipends policy for their program(s). The stipends policy must be submitted to and approved by your assigned Program Specialist through Workforce Partnership.

Stipends may be paid for satisfactory attendance, participation and completion of education and certificate attainment in any of the following activities:



- Job Readiness Training
- 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.
- Other

## IV. CALJOBS ENROLLMENT PROCESS FOR P2E ELIGIBILITY

### A. ESTABLISHING ELIGIBILITY

Documentation to support a participant’s formerly incarcerated or justice-involved status is required to establish P2E eligibility. Examples of verification include police records, official correspondence from a parole or probation department, phone verification by a parole or probation agent, or other official documentation demonstrating an individual’s relevant interaction with the criminal justice system. In the event that a participant is unable to provide verification – self-attestation **ATTACHMENT - APPLICANT STATEMENT** can be used; however, this should be a last resort and not standard practice.

Refer to Workforce Partnership Operations Manual, Chapter 4, Part 1: Adult and Dislocated Worker Program Attachments and Chapter 7, Part 1: Adult and Dislocated WIOA Eligibility for guidance and more information.

### B. P2E INITIATIVE ELIGIBILITY AND SUBPOPULATIONS

#### 1a. Formerly Incarcerated Eligibility - Type of Incarceration

<b>Federal Facility</b>	<b>State Facility - includes all CDCR State Prisons or CDCR contracted out-of-state facilities</b>	<b>County Facility</b>
Federal Penitentiary	State Prison	County Jail
Tribal	MCRP - Male Community Reentry Program	ACP - Alternative Custody Program, includes home detention and work release
Military	CCTRP - Custody to Community Transition Reentry Program	A felony prison term served in county jail under Penal Code 1170(h)
Immigration Detention	ACP - Alternative Custody Program	County Juvenile Hall or Other Local Juvenile Facility
Home Detention	CPMP - Community Prisoner Mother Program	
	DJJ - Division of Juvenile Justice	

1b. Formerly Incarcerated Eligibility – Post-release Classification

Federal Supervision	State Parole	County Probation, including Postrelease Community Supervision (PRCS)	Fully Discharged, not under any postrelease supervision
Federal Probation	Residential Programs - including Female Offender Treatment and Employment Program (FOTEP), Parolee Service Center (PSC), Residential Multi-Service Center (RMSC), Specialized Treatment for Optimized Programming (STOP), Transitional Housing Program (THP)	PRCS - Postrelease Community Supervision (released from state prison, supervised by County Probation)	
Federal Supervised Release	Outpatient and Drop-In Programs - includes Caltrans Parolee Work Crew Program, Community-Based Coalition (CBC), Computer Literacy Learning Center (CLLC), Day reporting Centers (DRC), Substance Abuse Treatment and Recovery Program (STAR)		

2. Justice-Involved Eligibility (actively under supervision or under the jurisdiction of CDCR or a County)

State Parole	County Probation, non-PRCS (formal probation, non-prison release)	Post Release Community Supervision (released from state prison)	Informal Probation
County Mandatory Supervision	County Deferred Entry of Judgement	Other County Diversion Program	

**C. CALJOBS ENROLLMENT PROCESS FOR P2E PARTICIPANTS**

Participant enrollment using the CalJOBS system will follow a similar process to the existing enrollment process for WIOA Title I Adult and WIOA Title I Youth participants and the interface used for participant enrollment and data capture will be nearly identical to that of the Title I application, with some notable exceptions. Users should note those exceptions in order to ensure Initiative participant characteristics and activities are adequately captured.

Appendix III provides specific information on differences in the Initiative’s enrollment process relative to that of WIOA and provides instructions on how to navigate the CalJOBS enrollment process for Initiative participants. Differences exist for the following stages of enrollment:

- Right to Work Verification
- Citizenship
- Selective Service
- Low Income Exception (In-School Youth only)
- P2E Eligibility Requirement
- Formerly Incarcerated and Justice-involved Categories in CalJOBS

Additionally, new data fields have been created specifically for the expanded list of formerly incarcerated and justice-involved populations. Those fields are located in the “Miscellaneous” section of the application and will automatically appear once the CalJOBS user selects the “Prison to Employment Initiative Participant” option (see Figure 5 in Appendix I).

#### D. P2E INITIATIVE GRANT CODES AND CALJOBS

The below grant codes have been created to track activities funded through each P2E grant. WIOA Title I requires separate grant codes for youth and adults, P2E does not require this. At the onset of initiating an application a participant will be entered as either a youth or adult in the CalJOBS system but once the participant is enrolled into the Non-WIOA special grant/P2E program at the end of application process, all participants will be tracked under one grant code.

It is important to note that there are two P2E contracts with separate funding streams and outcomes. Some programs are using both grants to serve the same participants while others are serving a cohort with Direct Services funds and a separate cohort with Supportive Service funds. At the end of the application when selecting the Non-WIOA special grant, both 2287 and 2286 will be an option. If a participant is being served with both funding streams/contracts, then they would be enrolled into both 2287 and 2286. If a participant is only being served with the Direct Services contract, then 2287 would be chosen. There is always the option to go back at a later date and attach the other grant code to the participant.

- Direct Services: **2287**
- Supportive Service / Earn and Learn: **2286**

#### E. CAPTURING PROGRAM ACTIVITIES

P2E grantees are asked to record all data on services provided to individuals through the Initiative using the CalJOBS system.

All activities allowed under WIOA are also allowable under the P2E Initiative. Appendix II includes a table which lists allowable uses under the Initiative as defined by SB 866 and the corresponding CalJOBS codes that should be used to record those activities. Subrecipient should use the CalJOBS activity codes that most accurately correspond to the services rendered.

#### F. LATE DATA ENTRY

Timely data collection is required. Entry of applications, objective assessments, literacy/numeracy assessments, ISS/IEP, activities, case notes, measurable skills gains, closure forms, and follow-up forms must be entered within seven (7) calendar days after the date of occurrence. Late data entry is defined as CalJOBS data entry that is entered later than seven (7) calendar days and is based on the total number of CalJOBS data entered. Late data entry should be no more than 5% and will be included

as part of performance as noted in subrecipient's contract in the program performance measures attachment. CalJOBS allows for data to be backdated up to 30-days by providers. No data cannot be backdated greater than 90 days of the current date. Only follow-up activity codes can be entered after exit.

## G. PROGRAM EXIT FOR P2E PARTICIPANTS

Under the WIOA Title I application an exit is the last date of service for all programs that utilize the WIOA Title I application, and there is no ability for the participant's service "clock" to reset once exited.

There are a few instances that allow for a hard exit, called an Exclusionary Exit, incarceration is one. An Exclusionary Exit is an immediate exit from the program. For P2E if a participant is incarcerated and the sentence is less than 90 days a hard exit is not recommended. This provides an opportunity to work with the individual during incarceration and upon release. If a participant's sentence is longer than 90 days, it is recommended to perform an Exclusionary Exit.

Additionally, for P2E those who are co-enrolled into other programs **through the Title I application**, the date in which individuals stop receiving services funded through P2E may not represent an exit if those individuals continue to receive services funded through programs other than P2E. An example would be if a participant enrolled into WIOA Title I and P2E, both through the WIOA Title I application. If a participant is ready to exit P2E they are not officially exited until the completion of both programs. This means that outcomes that occur past exit will not begin until the completion of all programs under the Title I application are final. In order to fulfill required reporting requirements, subrecipients must track co-enrolled individuals' participation in other programs throughout their enrollment in P2E as well as retention in employment upon exit, based on WIOA metrics.

## V. CORRECTIVE ACTION

The subrecipient is expected to work closely with Workforce Partnership 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 Workforce Partnership. This policy outlines the procedures for corrective action and details the manner in which Workforce Partnership 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:

- 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
- Significant monitoring findings and/or not working to address and/or close findings in a timely manner
- Underspending contract amount against planned budget/trend
- Mismanagement of contract which impacts Workforce Partnership performance standards, expenditure rates, employer relations and/or customer service
- 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 Workforce Partnership and subrecipient negotiated contract changes.

Refer to Workforce Partnership's [Operations Manual, Chapter 4 Part 1: Adult and Dislocated Workers Program Activities](#) for guidance on Corrective Action policies and procedures.

## VI. P2E ATTACHMENTS

### **Appendix I**

Figure 1. Establishing P2E Eligibility

Figure 2. Identifying Type of Incarceration for Formerly Incarcerated Individuals

Figure 3. Identifying Post-Release Classification for Formerly Incarcerated Individuals

Figure 4. Identifying Type of Supervision for Establishing Justice -Involved Eligibility

### **Appendix II**

Allowable Activities Glossary

### **Appendix II**

P2E Eligibility Requirement

Right to Work Verification

Citizenship Status

Selective Service

Low Income Exception for Youth

Formerly Incarcerated and Justice-involved Categories in CalJOBS

### **Appendix IV**

References and Additional CalJOBS Resources

[P2E ELIGIBILITY CERTIFICATION AND REVIEW FORM \(ECRF\)](#)