

OPERATIONS MANUAL CHAPTER 4. PART 2: YOUTH PROGRAM ACTIVITIES

Revised August 2020

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I. INTRODUCTION

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

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

https://www.edd.ca.gov/Jobs_and_Training/Information_Notices.htm

B. WIOA Youth Eligibility

The following youth are eligible for WIOA Youth funded services. Specific eligibility requirements within these categories are defined in ***SDWP Operations Manual, Chapter 7, Part 2: WIOA Youth Eligibility*** and within YSP contracts.

- In-School Youth - Youth ages 14-21, attending school, low income and meets one or more barriers.
- Out-of-School Youth - Youth ages 16-24, not attending any school, and meets one or more barriers.
- Independent Living Skills/WIOA – Foster Care Youth - Youth ages 14-24 enrolled in the County of San Diego’s Independent Living Skills Program.
- San Pasqual Academy – Foster Care Youth - Youth ages 14-21 enrolled at San Pasqual Academy, a residential high-school for youth in the San Diego foster-care system.

C. CalJOBS

CalJOBS is the required system administered in partnership with EDD to document all youth 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 Service Strategy (ISS) requirements.

5. Tracking Requirements

Timely data collection is required. Entry of applications, objective assessments, Educational Functioning Level, ISS/IEP, activities, case notes, measurable skills gain’s, 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 youth funds may be expended on costs related to individuals who are not yet participants in the WIOA youth program. Youth funds can be expended on outreach and recruitment or assessment for eligibility determination (such as assessing basic skills level) prior to eligibility determination, but they cannot be spent on youth program services, such as the 14 program elements prior to eligibility determination.

E. Monitoring, Accessibility 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 - YOUTH PARTICIPANT FILE MONITORING CHECKLIST](#)**

WIOA requires that YSPs 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 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 YSPs contract closeout. If any open findings, grievances or other claims related to the records exist at the end of the four-year period, the records must be maintained indefinitely, until all findings or other issues are fully resolved.

In the event a YSP ceases operations and has no place for storage of the records, the YSP 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. Participant File Documentation

The case manager must use the "Document Manager" and/or the "Verify" links in CalJOBS to upload proper documentation into the participants CalJOBS case file and/or activities, or to the Workforce eFile system, when applicable. All participant files must be kept electronically by following the processes outlined in the Operations Manual. Documents uploaded to CalJOBS and Workforce eFile must be labeled accurately.

H. Collection of Medical Information

While collection and data entry of medical information, including disability-related information, may be required, the documentation must be marked as "PII" in Workforce efile. The case manager should enter/select all accurate information in CalJOBS, however, case notes should not include medical information. 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 service provider must follow the following steps to ensure privacy and confidentiality of the 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 marked as “Yes” in the Workforce eFile, which will hide and lock the file, or if the forms/documents are uploaded into CalJOBS, the PII file would remain secure.

Note: Case notes 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 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 2: Youth 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.

II. PROGRAM COMPONENTS

A. Access & Locations

YSPs are required to address transportation and other barriers by increasing access points for participants. YSPs will maintain a main office, a satellite office, or co-locate with other organizations in the proposed service area.

1. Online Access

Subrecipients may provide program services over the phone (i.e. conference call number) or through a visual-virtual conference (i.e Zoom, FaceTime). For services that require attendance be noted, the subrecipient must document the start and end times **and** the application used to provide the service in the attached case note. Case notes must be descriptive when documenting all program services.

B. Partnerships

YSPs are expected to demonstrate local partnerships with youth serving systems such as local secondary schools, higher education institutions, law enforcement, juvenile and adult justice systems, local housing programs, community-based agencies, the County of San Diego's Health and Human Service Agency, vocational rehabilitation programs, employers, and other organizations that serve the eligible population. YSPs shall demonstrate how they will partner and collaborate with current AJCC's in their proposed service area to provide appropriate youth employment services within the AJCC. This may include providing workshops and classes on-site, technical assistance to AJCC staff on providing youth friendly services, orientations to the array of adult services offered and in-kind resources to/from AJCC sites.

o 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 youth. 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.
- The youth meet the eligibility requirements for each program from which they are receiving funds.

Example: A youth is enrolled in a WIOA Title I youth program and a WIOA Title II adult education program. The WIOA Title I resources can provide career guidance, work experiences, and leadership development, while the WIOA Title II resources can provide adult education and literacy activities.

C. Business Service Representative

YSPs are required to budget for a minimum of one full-time or part-time (no less than 20 hours per week) Business Service Representative (BSR) whose activities shall be dedicated exclusively to engaging industry and coordinating work-related activities for program participants. The primary role of the BSR is to engage employers and secure internships, job shadow opportunities, occupational skills training, apprenticeships, work experience, and unsubsidized job placements for program participants, as well as track performance outcomes. BSR's must attend SDWP trainings and meetings pertaining to business services. *Reference Chapter 11. Business Services Policy and Procedures for more information.*

D. Mental Health Services

YSP staff are required to participate in trainings offered by SDWP regarding understanding, recognizing and responding to the effects of trauma and mental health needs. Additional trainings will be offered on how to identify and access additional mental health resources for staff and participants.

E. Meetings, Trainings & Reports

YSPs shall send designated staff to attend and participate in all scheduled meetings and trainings for WIOA Youth Programs.

Subrecipient shall be required to submit an **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

YSPs have the discretion to determine what specific program services a youth participant receives, based on each participant's OA and ISS. YSPs are not required to provide every program service to each participant. However, YSPs must ensure that all 14 program elements are available through their program or referral to another entity that provides that service.

A. Outreach, Recruitment & Orientation

Outreach and recruitment includes, but is not limited to, identifying potentially eligible youth, working with parents and guardians to secure necessary documentation, and working closely with other governmental and community organizations and school systems to identify and recruit youth. As part of orientation, all youth must receive information on all services available through the YSP. Dropout youth are expected to have the ability to earn a high school diploma or its equivalent within a reasonable amount of time (generally within one year of participation date).

B. Referrals

Eligible youth 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. In addition, eligible youth should be given referrals for further assessment if determined appropriate.

C. Intake, Eligibility Determination & Registration

YSPs are responsible for determining WIOA eligibility of all youth applicants recruited into the program, determining the youth's suitability for program services, and collecting and verifying all necessary eligibility source documents in the Workforce eFile system. WIOA requires all youth 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 2: WIOA Youth 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 2: WIOA Youth Eligibility***.

a) *Re-Enrollment Documentation*

If a participant is being re-enrolled, the YSP must document the reason for re-enrollment on the ISS/OA 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 ISS as a continuation of services. It is the responsibility of the

YSP to review past participation to ensure that repeated services are part of the youth's goals/objectives on the ISS.

D. Objective Assessment Summary (OA)

YSP are required to provide an Objective Assessment Summary (OA) 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,
- mental health services, and
- developmental needs.

The YSP must mark all applicable barriers on the OA.

The OA must be conducted after enrollment and prior to providing program services. YSPs can use previous basic skills assessment, career interest, and aptitude tests if such previous assessments have been conducted within the past six months. The OA 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 OA as deemed necessary for program assessment and enrollment. There should only be one OA per WIOA application.

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

Objective Assessment (OA) Process

- On the participation form select the appropriate OA code as the first activity.
 - Select the begin date as "Today."
 - Select the projected end date as "Today."
- Create and complete an OA in CalJOBS (*Staff Profiles - Case Management Profile – Plan*) prior to providing program services - including issuing supportive services, incentives, stipends or work experience.
 - *Include any assessment results, including Educational Functioning Level (Literacy/Numeracy), if applicable*
- *Close the OA activity code and mark the completion status.*
 - *Case note must include the status of the OA*
- *The OA must be completed within 30 days of enrollment. If any updates need to be made within those 30 days, additional OA activity codes must be created and closed on each day the OA is 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 in **SDWP Operations Manual, Chapter 5: CalJOBS Data Entry Policies and Procedures.***

1. Educational Functioning Level (Literacy/Numeracy)

Literacy/Numeracy, or Educational Functioning Level, can be used to fulfill the following program elements:

- Eligibility,
- Objective Assessment, and/or
- Measurable Skills Gain

For basic skills assessment, YSPs are required to use assessments approved by the Department of Education's National Reporting System (NRS) if the test is being used for Eligibility and/or Measurable Skills Gain. YSPs are not required to use approved assessments for Objective Assessment. YSPs can use previous basic skills assessment results if such previous assessments have been conducted within the past six months.

- Test for Adult Basic Education (TABE)
 - Locator test should be given to determine level (A-Advanced, D-Difficult, M-Medium, E-Easy)
 - Pre-test with Survey or Complete Battery
 - Recommended at 60-95 hours of instructional time or 6 months
 - Use different version for post-test (If TABE 9 was used for pre-test then use TABE 10 for post-test)
- Comprehensive Adult Student Assessment Systems (CASAS)
 - Appraisal test must be given to determine level
 - 70-100 hours of instruction recommended (no less than 40 hours would be accepted)
 - Use different version for post-test

The YSP needs to be trained from company before administering test and must also check yearly on the Federal Register to determine that the test they are currently using is suitable for use in the NRS.

- [WIOA and NRS Resources](#)
- [EFL Test Benchmarks](#)
 - [CASAS Scale Scores, NRS Educational Functioning Levels \(EFLs\), and Grade Levels](#)

Educational Functioning Level Process

Pre-Test

- Complete a pre-test within 30 days of enrollment if using for objective assessment or MSG, prior to providing program services
 - *On-line test (put print out of test results in the file)*
 - *Paper test (put original answer sheets in the file)*
- Include pre-test information on the Objective Assessment Summary
- Include the pre-test information in the Objective Assessment activity code in CalJOBS
 - *At minimum, the case note must include: whether the test was used for eligibility, MSG, and/or objective assessment, type of test, type of assessment, test version, and test results*
- Create Educational Functioning Level records in CalJOBS if the participant is basic skills deficient

Post-Test

- Complete post-test within one year of enrollment or prior to closure, whichever comes first.
 - *On-line test (put print out of test results in the file)*
 - *Paper test (put original answer sheets in the file)*
- Create an Objective Assessment activity code in CalJOBS

- *At minimum, the case note must include: type of test, type of assessment, test version, and test results*
- Enter results in the Educational Functioning Level records in CalJOBS

E. Individual Service Strategy (ISS)

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

YSPs must develop an Individual Service Strategy (ISS) for each participant that:

- Considers 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 and/or employment goals (including, in appropriate circumstances, nontraditional employment)

The case manager must utilize the ISS to update strategies and activities as they occur. When reviewing the ISS, case managers must document the participant's progress, goals and/or objectives completed, benchmarks reached and any other accomplishments. The ISS 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

- Initial Development
 - The ISS should be the second activity opened, either concurrently or sequentially with the Objective Assessment Summary.
 - Open an ISS 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, incentives, stipends or work experience.
 - Close the ISS 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.*
- Updates to Goals/Objectives
 - YSP’s must update the ISS every 3 months
 - Open a new ISS Activity Code.
 - Update the ISS in CalJOBS (*Staff Profiles - Case Management Profile – Plan*)
 - Enter the date of the ISS Activity Code on the ISS comment box and provide a summary of the update.
 - Close the open activity on the date the ISS was revised and update the case note.
- Completion of the IEP/ISS
 - Include an attached case note on the Closure Form: “Completion of IEP/ISS”.
 - The case note must include that the goals and objectives have been successfully and/or unsuccessfully completed at time of program closure.

F. Verification of Right to Work

Based on the OA and ISS, the YSP 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 YSP must verify the participant’s right to work in the United States and keep the documentation in CalJOBS. 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 unpaid work experience 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 YOUTH JOB PLACEMENT	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 ALL YOUTH EMPLOYMENT SERVICES & ACTIVITIES	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.
- A copy of the documentation used to verify right to work must be uploaded/attached to the first employment service provided in CalJOBS. It must include a document from List A or List B and C.
 - The I9 Form is only required as part of a subsidized work-experience
- Enter an attached case note with the title: “**RIGHT TO WORK VERIFICATION**” and include the types of documents collected from either List A or B and C.

G. Program Elements

YSP must make each of the following 14 services available to participants:

1. **Tutoring, study skills training, instruction and dropout prevention services** that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential. This includes secondary school dropout prevention strategies that keep a youth in school and engaged in formal learning or training;
2. **Alternative secondary school services, or dropout recovery services** - Alternative secondary school services assist youth who have struggled in traditional secondary school education. Dropout recovery services are aimed at getting youth who have dropped out of secondary education back into a secondary school or alternative secondary school/high school equivalency program;
3. **Paid and unpaid work experiences** that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:
 - a. Summer employment opportunities and other employment opportunities available throughout the school year;
 - b. Pre-apprenticeship programs;
 - c. Internships and job shadowing; and
 - d. On-the-job training opportunities.

For more information on work experience activities - refer to the Work Experience section.

4. **Occupational skills training**, which includes priority consideration for training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area, is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupation fields at entry, intermediate, or advanced levels. Occupational skills training must meet the following criteria:
 - a. Be outcome-oriented and focused on an occupational goal specified in the individual service strategy.
 - b. Be of sufficient duration to impart the skills needed to meet the occupational goal.
 - c. Lead to the attainment of a recognized postsecondary credential.
 - d. Meet the quality standards in WIOA Section 123.

For more information on credentials and/or certificates received through occupational skills training - refer to the Credential Attainment section under Performance.

5. **Education offered concurrently with workforce preparation and training** for a specific occupation or occupational cluster. This element refers to the concurrent delivery of workforce preparation activities, basic academic skills, and hands-on occupational skills training in a specific occupation, occupational cluster, or career pathway;

6. **Leadership development opportunities**, including community service and peer-centered activities, encouraging responsibility, confidence, employability, self-determination, and other positive social behaviors;
7. **Supportive services** that enable an individual to participate in WIOA activities;
For more information on Supportive Services - refer to the Supportive Services section under **Error! Reference source not found.**
8. **Adult mentoring** for a duration of at least 12 months, that may occur both during and after program participation;
9. **Follow-up services** for not less than 12 months after the completion of participation;
For more information on follow-up services - refer to the Follow Up Services section under **Error! Reference source not found.**
10. **Comprehensive guidance and counseling** provides individualized counseling to participants and may include drug and alcohol abuse counseling, mental health counseling, and referral to partner programs;
11. **Financial literacy education** includes information and activities such as creating budgets, setting up checking and saving accounts, managing spending, understanding credit reports, and protecting against identity theft;
12. **Entrepreneurial skills training** assists youth develop the skills associated with starting and operating a small business;
13. **Services that provide labor market information** about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
14. **Postsecondary preparation and transition activities**, which prepares youth for postsecondary education after attaining a high school diploma or its recognized equivalent.

Refer to **TEGL 21-16 and EDD Directive WSD17-07** or clarifications on definitions and examples of qualifying activities under each category.

H. Supportive Services

Supportive services are services that enable an individual to participate in WIOA activities. These services include, but are not limited to, the following:

- Linkages to community services;
- Assistance with transportation;
- Assistance with childcare and dependent care;
- Assistance with housing;
- Needs-related payments;
- Assistance with educational testing;
- Reasonable accommodations for youth with disabilities;
- Legal aid services;
- Referrals to health care;
- Assistance with uniforms or other appropriate work attire and work-related tools, including eyeglasses and protective eye gear;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
- Payments and fees for employment and training-related applications, tests, and certifications;
- Other needs related to training or employment retention, as determined by the case manager, to ensure the youth can continue to participate in and complete WIOA activities.

1. Supportive Service Guidelines

- Participants may receive a maximum of \$800 per program year;
- The supportive service must be documented on the ISS under the specific goal/objective related to the service activity or training provided;
- The supportive service must be provided in conjunction with another career service or training service and must be within the same dates of the career service or training activity; and
- Supportive service payments must be in accordance with Cost Principles in 2 CFR part 200.

Supportive Service Process

- Enter the appropriate activity code for the Supportive Service provided
 - *At minimum, the attached activity case note must include the following information:*
 - *Type of supportive service*
 - *Amount of supportive service*
 - *Include a calculation, if applicable*
 - *Type of WIOA Title I Youth Activity for which supportive services will be used*
 - *Exhausted all free and low-cost resources to provide supportive services*
 - *Funding source (WIOA, non-WIOA, Youth Build, In-Kind, etc.)*
 - *Program year balance*
 - *Distribution and acknowledgement details*
- Upload the following documentation to CalJOBS and attach to the corresponding activity code:
 - Copy of check, gift card or other type of card with serial number visible, if applicable
 - Copy of the itemized receipt with date, purchase detail, and total
 - For bus passes purchased, either individual or in bulk, a copy of the purchase receipt with the purchase date and total(s) must be kept as the itemized receipt. The serial number should be highlighted or circled on the receipt.
 - For gas cards and ride share purchased:
 - The start and end address must be provided, including the location names (i.e. Home and Address to Work Name and Address); and
 - Total mileage must be noted as an attached case note for each trip.
 - If using the gas card or ride share for multiple activities, the usage must be clearly tied to each open activity code service and noted on the attached case note.
 - Written or visual (picture) confirmation of receipt of the supportive service from the participant (in lieu of the Supportive Services Log and Receipt Form)

If payment is made to the youth in advance of the purchase either through check, gift card or other type of card, the youth must provide an itemized receipt to the YSP once the purchase is completed, and the itemized receipt must then be included in CalJOBS. **THIS INCLUDES PURCHASE RECEIPTS FROM THE USE OF GIFT CARDS AND/OR GAS CARDS. IF NOT RETURNED, NO ADDITIONAL SUPPORTIVE SERVICES MAY BE PROVIDED.**

2. Missing Documentation and Receipts

The YSP must document as an attached case note to the Supportive Service activity code in CalJOBS if a participant fails to return the receipts for the supportive services provided in full and include an explanation of the following:

- Contact the participant requesting the missing receipts and explain that no further supportive services will be provided until the missing receipts are received in full;
- Notify your assigned Program Specialist through SDWP, via e-mail, of the outstanding receipts and that no further supportive services will be processed for the participant until the receipts are collected; and
- If the receipts are not provided, send a follow-up letter within five (5) business days to the participant requesting the receipts and notifying the customer that no further supportive services will be provided until all receipts are received. A copy of this letter must be kept in CalJOBS.

3. Separation of Duties

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

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

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

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

I. Incentives

Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. Refer to **Subrecipient Contract - Attachment** for the approved Incentive Policy.

1. Incentive Guidelines

- Incentives may only be given to recognize an achievement or to signify completion of a training, education, or work experience activity.
- Incentives may only be in the form of check or gift card;
- The incentive must be documented on the ISS under the specific goal/objective related to the achievement;
- Incentives must be aligned with approved Incentive Policy; and
- Incentive payments must be in accordance with Cost Principles in 2 CFR part 200.

2. Incentive Limitations

- **Entertainment Costs:** Federal funds must not be spent on entertainment costs. Therefore, incentives must not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment.
- **Incentives cannot be used to recognize participation in a service/activity.**

Incentives Process

- Enter the appropriate activity code for the Incentive provided
 - *At minimum, the activity case note must include the following information:*
 - *Type of incentive: check or gift card;*
 - *Distribution and acknowledgement details;*
 - *Amount of incentive; and*
 - *Reason for incentive*
- Upload the following documentation to CalJOBS and attach to the corresponding activity code:
 - Copy of check, gift card with serial number visible, if applicable
 - Written or visual (picture) confirmation of receipt of the incentive from the participant (in lieu of the Incentive Log and Receipt Form)

J. Stipends

Stipends are defined as fixed regular small payments made to a participant during their enrollment to encourage program participation. The stipend can be used for classroom-based learning activities. Stipends must be paid based on actual hours of attendance and participation. Attendance and participation in the activity must be documented as a basis of stipend payment. The activity should be of limited duration and should be tied to specific learning goals.

Each YSP may develop a stipends policy for their program(s). Stipends may only be paid for activities which begin and are completed after participation (enrollment). The Stipends policy must be submitted to and approved by your assigned Program Specialist through SDWP before program implementation, and before given or promised to any participant. Refer to **Subrecipient Contract - Attachment** for the approved Stipend Policy.

1. Types of Stipends

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

- High school diploma, GED, or equivalent;
 - Attendance at secondary school
 - Attendance at High School Equivalency classes
 - Attendance at alternative school
 - Attendance at adult education for basic skills enhancement if the participant is documented as basic skills deficient
- Occupational/technical skills training;
 - Attendance in a post-secondary skills training tied to a specific occupation
 - Participation in work-readiness training
 - Participation in job-shadowing or unpaid internship
 - Participation in financial literacy training
 - Participation in entrepreneurial skills training
- Pre-apprenticeship skills/trades training;
 - Participation in classroom-based apprenticeship training

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

Stipends may not be awarded for participation in a paid work experience or employment.

Stipends cannot be used in any activity where wages are being paid. Stipends shall not be disbursed until the participant meets all stipulated requirements and contractor staff verifies the attainment of the program outcome(s).

All YSPs who provide stipends as payments to participants, paid for with WIOA funds, must ensure that their methods of payment comply with the following required tracking and documentation procedures. The employer of record must adhere to all child labor laws regarding hours of employment, working conditions, etc. For more information see the following website:

<http://www.dir.ca.gov/dlse/ChildLaborPamphlet2000.html>

2. Stipend Guidelines

- The stipend must be documented on the ISS under the specific goal/objective related to the participation in the career activity or training;
- Stipends must be aligned with approved Stipend Policy;
- The Stipend must be provided in conjunction with another career service or training service and must be within the same dates of the career service or training activity; and
- Stipend payments must be in accordance with the requirements contained in [2 CFR part 200](#).

Stipend Process

- Enter the appropriate activity code for which the Stipend was provided. The stipend must be documented on the education/training service.
 - *At minimum, the activity case note must include the following information:*
 - *Method of payment*
 - *Amount*
 - *Date Provided*
 - *The determining factors in paying a stipend as opposed to a wage*
 - *Distribution and acknowledgement details*
- Provide the following documentation and attach to the appropriate CalJOBS training/education activity code:
 - Time sheets or attendance sheets; and
 - A worksheet showing how the payment amount was calculated; and
 - Copy of high school diploma, GED or official transcripts verifying completion of a diploma or GED that includes required information for data validation, if applicable; or
 - Copy of certificate of attainment verifying completion of occupational/ technical skills, or pre-apprenticeship skills/trades training, if applicable; and
 - Written or visual (picture) confirmation of receipt of the stipend from the participant (in lieu of the Stipends Log and Receipt Form)

3. Stipend Records

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

Participant records (ISS, case notes and worksheets) and contractor financial records pertaining to stipend payments must be made available for review by local, state, and Federal monitors, and must meet the financial management policies/standards specified in the Partnership's [Operations Manual Chapter VI, Financial Management](#) including enough information to provide:

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

K. Work Experience

Work experiences are planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. A work experience may take place in the private, for-profit sector or non-profit sectors when the participant's objective assessment and individual service strategy indicate that a work experience is appropriate. Labor standards apply in any work experience where an employee/employer relationship, as defined by the Fair Labor Standards Act or applicable State law, exists. Work experiences provide the youth participant with opportunities for career exploration and skill development.

1. Categories of Work Experience

Paid and unpaid work experiences must include academic and occupational education (provided either concurrently or sequentially) and may include the following:

- Summer employment opportunities and other employment opportunities* (subsidized work experience) available throughout the school year.
- Pre-apprenticeship programs.*

Pre-apprenticeship is a program designed to prepare individuals to enter and succeed in an apprenticeship program. Pre-apprenticeship programs include the following elements:

 - Training and curriculum that aligns with the skill needs of employers in the economy of the state or region involved.
 - Access to educational and career counseling and other supportive services, directly or indirectly.
 - Hands-on, meaningful learning activities that are connected to education and training opportunities.
 - Opportunities to attain at least one industry-recognized credential.
 - A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program.
- Internships and job shadowing.*

Job shadowing is a temporary, unpaid exposure to the workplace in an occupational area of interest to the participant and may last anywhere from a few hours to a week or more.
- On-the-job training (OJT) opportunities.*

OJT means training by an employer that is provided to a paid participant while engaged in a job that meets the following criteria:

- Provides knowledge or skills essential to the full and adequate performance of the job.
- Is made available through a program that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant.
- Is limited in duration to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant as appropriate.

The academic and occupational education component refers to contextual learning that accompanies a work experience. It includes the information necessary to understand and work in specific industries or occupations.

2. Compliance of Work Experience

a) Federal Labor Laws

The Department of Labor (DOL) administers and enforces more than 180 federal laws. These mandates and the regulations that implement them cover many workplace activities for about 10 million employers and 125 million workers.

The website contains information regarding, but not limited to:

- Wages and Hours
- Workplace Safety and Health
- Worker's Compensation
- Employee Benefits
- Employee Protection
- Posters
- Related Agencies

b) Equal Opportunity Employment Commission

The U.S. Equal Employment Opportunity Commission (EEOC) is responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or an employee because of the person's race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability or genetic information. It is also illegal to discriminate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.

c) Child Labor Laws

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

- Child Labor Laws
- Work Permits
- Entertainment Work Permits

d) State Labor Laws

State labor laws are administered by the State of California's Department of Industrial Relations, Labor Commissioner's office. The mission of the California Labor Commissioner's Office is to ensure a just day's pay in every workplace in the State and to promote economic justice through

robust enforcement of labor laws. By combating wage theft, protecting workers from retaliation, and educating the public, we put earned wages into workers' pockets and help level the playing field for law-abiding employers. This office is also known as the Division of Labor Standards Enforcement (DLSE).

The website contains information regarding:

- Division of Occupational Safety and Health (DOSH), better known as Cal/OSHA
- Labor Laws
- Labor Commissioner's Office
- Workplace Postings

e) [City of San Diego - Minimum Wage Program](#)

The City of San Diego's Earned Sick Leave and Minimum Wage Ordinance, San Diego Municipal Code (SDMC) Chapter 3, Article 9, Division 1 became effective on July 11, 2016. It is applicable to employees who perform at least two (2) hours of work in one or more calendar weeks of the year within the geographic boundaries of San Diego.

The website contains information regarding:

- Minimum Wage
- Earned Sick Leave
- Notice and Posting
- Complaint Process
- City of San Diego geographic boundaries

f) *Right to Work - U.S. Citizenship & Immigration Services*

Form I-9 is used for verifying the identity and employment authorization of individuals hired for employment in the United States. All U.S. employers must ensure proper completion of Form I-9 for each individual they hire for employment in the United States.

The website contains information regarding:

- Form I-9, Employment Eligibility Verification
- Form I-9 Supplement, Prepare and/or Translator Certification
- Instructions for Form I-9
- Handbook for Employers, Guidance for Completing Form I-9

g) *Workplace Postings*

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

3. Work Experience Expenditure Requirement

WIOA requires YSP to spend at least 20% of funds on work experience. Allowable work experience expenditures include the following:

- Wages/stipends, staffing costs, and benefits paid for participation in a work experience;
- Staff time working to identify and develop a work experience opportunity, including staff time spent working with employers to identify and develop the work experience;
- Staff time working with employers to ensure a successful work experience, including staff time spent managing the work experience;
- Staff time spent evaluating the work experience;
- Participant work experience orientation sessions;
- Employer work experience orientation sessions;
- Classroom training or the required academic education component directly related to the work experience;
- Incentive payments directly tied to the completion of work experience; and
- Employability skills/job readiness training to prepare youth for a work experience.

4. Subsidized Work Experience

a) *Subsidized Work Experience Guidelines*

- Duration: Minimum 40 hours per subsidized work experience.
- The work experience must be documented on the ISS under the specific goal/objective related to the participation in the activity.
- Approved incentive pertaining to successful completion of the work experience.
- Pay rate: At least minimum wage, which may vary by City.
- Employee Evaluation. Each employee should be evaluated on the following aspects:
 - Punctuality and attendance;
 - Work habits;
 - Appearance;
 - Communication;
 - Task completion; and
 - Follows direction.

b) *Subsidized Work Experience Limitations*

- Duration: Maximum 240 hours per subsidized work experience
- More than 240 hours requires written approval from SDWP.
- A work experience cannot be used to document an MSG

Work Experience Process

- Enter the appropriate activity code for the Work Experience provided
 - Only one work experience activity code should be open for the duration of the entire work experience, per the training plan and agreement.
 - *At minimum, the activity case note must include the following information:*
 - *Name of employer*
 - *Participant's job title*
 - *Pay rate*
 - *Number of hours per week*
 - *Start date*
 - *Funding source: WIOA, non-WIOA, Youth Build, County of San Diego, employer paid, etc.*
 - *Date of Employer/Worksite Orientations*
 - *Employer Evaluation at completion of the Work Experience*
 - *Distribution and acknowledgement details*
- Upload the following documentation to CalJOBS and attach to the corresponding activity code.:
 - Work Permit for Minors (if applicable);
 - Completed I-9;
 - Completed W-4 Employee's Withholding Allowance Certificate;
 - Worksite Agreement and Training Plan;
 - Timesheets;
 - Progress Reports; and
 - Proof of payment.

c) *Timesheets & Progress Reports*

Timesheets must follow DOL Fair Labor Standards Act (FLSA) and California Department of Industrial Relations. Timesheets may be paper or electronic. At minimum, timesheets must include:

- Start and end time of each work period;
- Meal period taken;
- Split shift interval;
- Total hours worked daily and for total pay period;
- Signature or authorization of hours worked (may be electronic approval)

A progress report for each work period must be kept with the corresponding timesheet. YSP's may use the **ATTACHMENT - PROGRESS REPORT FORM** or develop their own progress report.

d) *Employer of Record*

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

e) Employer Orientation

YSP must conduct an Employer Orientation and provided information prior to participant's first day of work.

At a minimum, the Employer Orientation must include the following:

- Health and safety standards;
- Poster requirements;
- Reasonable accommodations for individual with disabilities as required by Americans with Disabilities Act (ADA).

f) Worksite Agreement & Training Plan

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

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

g) Employer Evaluation

YSPs must provide an employer evaluation at the completion of the work experience, documented with an attached case note. The case note should include information showing the YSP is monitoring the Worksite Agreement & Training Plan and evaluating the employer based on the plan, worksite conditions, and overall effectiveness of the work experience.

L. Individual Training Accounts (ITAs) & Registered Apprenticeships (ATAs)

Eligible youth can access ITAs and ATAs only through dual-enrollment through the AJCCs. The dual-enrollment must be approved by SDWP. When using funds for ITAs or ATAs, only training providers on the Eligible Training Provider List (ETPL) can be used. Refer to *SDWP Operations Manual, Chapter 4, Part 1: Attachment – ETPL, ITA, & ATA Policies and Procedures* for more information regarding ITAs and ATAs.

IV. CASE MANAGEMENT

Case Management is the infrastructure for delivering effective services that will facilitate the positive growth and development of youth 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 youth for post-secondary education opportunities, academic and occupational training or employment and training opportunities as appropriate. YSPs are encouraged to incorporate trauma informed approaches into their case management models.

A. Duration in Program

YSP must provide service to a participant for the amount of time necessary to ensure successful preparation to enter postsecondary education and/or unsubsidized employment. While there is no minimum or maximum time a youth can participate in the WIOA youth program, programs must link participation to the ISS and not the timing of youth service provider contracts or program years.

B. Active & Consistent Engagement with Participant

YSP 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 YSP can no longer provide many of the WIOA services the participant still may need to complete ISS plan, leading to negative WIOA performance outcomes.

1. ISS Updates

YSP's must update the ISS 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 service provider 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 YSP is still accountable for the performance measures and must complete all follow-up procedures as outlined in the follow-up policy.

C. Participant eFile Content

YSPs must maintain an electronic participant file on each registered youth. At a minimum, the file must contain eligibility, program and closure documentation. There are two types of electronic files where participant documentation will be kept: Workforce eFile and CalJOBS Document Manager (which includes documentation attached to activities/services).

Note: Any documentation with medical info, including disclosure and documentation of a disability, should be properly noted in CalJOBS and marked as PII in Workforce eFile.

1. Intake Documentation

Use the "Document Bin" in Workforce eFile to complete/upload the following required documents:

Refer to **SDWP Operations Manual, Chapter 7, Part 2: WIOA Youth 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

Use the “Document Bin” in Workforce eFile and/or the “Verify” links in CalJOBS to upload proper documentation, if applicable:

- Objective Assessment Tests/Original Answer Sheets
- Educational Functioning Level (Literacy/Numeracy) Assessment Pre-Test and Post-Test;
- Supportive Services
- Incentives
- Stipends
- Work Experience and **ATTACHMENT - PROGRESS REPORT FORM**

3. Closure Documentation

Use the “Verify” links in CalJOBS to upload proper documentation, if applicable:

- **ATTACHMENT - PROGRESS REPORT FORM** (MSG #4); 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, and 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

- Via Workforce eFile, the original provider's Case Manager must add **ATTACHMENT - REQUEST FOR DUAL-ENROLLMENT** to their participant's Document Bin and complete the form.
 - Once completed the Case Manager will request signature from the original provider Manager (this is the first signature required).
 - Once signed, the original provider Manager will request signature from the requesting provider Manager (this is the second signature required).
 - Once signed the original provider Manager will request approval from the Contract Administrator (this is the last signature required).
- 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 OA code as the first activity.
 - Under the OA activity code, the requesting provider should document that the OA has been completed by the original service provider and they have coordinated a dual-enrollment to address barriers noted on the OA.
 - 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.

Refer to Objective Assessment Summary and Individual Service Strategy (ISS) for more information on the requirements for each, unless otherwise noted in this section.

c) Dual-Enrollment Accountability and Performance

Both Service Providers 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

YSPs must complete a closure form in CalJOBS once a participant has completed their goals and objectives on the ISS 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 ISS. 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. YSPs 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 youth’s exit from the program to help ensure the youth is successful in employment and/or education and training. Follow up services may include regular contact with youth participant’s employer, including assistance in addressing work-related problems that arise.

Follow up services may begin immediately following the last expected date of service in the youth program. Follow up services do not cause the exit date to change and does not trigger re-enrollment in the program.

1. Follow Up Activities

Follow up services may include the following program elements:

- Supportive services;
- Incentives;
- Adult mentoring;
- Tutoring;
- Leadership Development;
- Financial literacy;
- 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; and
- Activities that help youth prepare for and transition to postsecondary education and training.

Refer to the most current CalJOBS Activity Code Dictionary to select the most appropriate F-Code.

2. Follow-Up Requirements

All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies. 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 requires YSP's to enter outcomes into follow-up forms 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 YSP 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 YSP should not attempt to contact the individual if they no longer elect to participate.

Youth 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.

3. 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.

4. Follow Up Supportive Services & Incentives

Supportive Services and Incentives provided in follow up must be tied to a performance measure and documented in the attached case note (F-Code), in lieu of documentation on the ISS. The case note must include the performance measure being attained and the dates of the F-Code must correspond to the reporting period where the supportive service or incentive is being provided.

The required documentation for Supportive Services and Incentives remains the same and must be kept in the participant's file and the required information must be entered into CalJOBS.

V. PERFORMANCE

WIOA requires a comprehensive accountability system to determine the effectiveness of services provided through the YSP network. All performance data is entered into CalJOBS in order to capture the required performance outcomes. Performance requirements are specifically called out in the ***Subrecipient Contract - Attachment - Program Performance Measures***.

A. Definitions

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 (in unsubsidized employment) OR found to be enrolled in secondary education, postsecondary education, or occupational skills training in the second and fourth quarters after exit. All participants are included in this indicator (excluding those that exited with an exclusionary exit), regardless of employment or education status at program entry. The following placements received during the quarterly reporting period will count towards the program performance measures:

1. Placement in Employment
2. Placement in Secondary School Education
3. Placement in Post-Secondary Education/Training
4. Placement in Occupational Skills Training
5. Placement in AmeriCorps or JobCorps

Documentation of Employment (Placement)

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

C. Median Earnings

The median earnings 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 includes participants who are enrolled in an education or training program who attain a recognized postsecondary credential or a secondary school diploma or its recognized equivalent. Credentials must include the following 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 Attainment

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.

All in-school youth are included in the credential attainment measure. Out-of-school youth enrolled in one of the following activities are included in this indicator:

- Occupational Skills Training
- Secondary or postsecondary school attendance during participation
- Title II-funded Adult Education at or above the 9th grade level
- Enrolled in YouthBuild during participation
- Enrolled in JobCorps during participation

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.

For a postsecondary credential received through occupational skills training to count toward performance, the credential must meet each of the following conditions:

- Awarded by a recognized public or private entity.
- Based on standards developed or endorsed by employers or industry associations.
- Awarded for a specific skill rather than a general skill, such as hygiene or safety training, even if such general skills certificates are broadly required to qualify for entry-level employment or advancement in employment.
- Necessary to obtain employment or career advancement.
- For a credential received through occupational skills training to meet quality criteria, the training provider must be listed on the Eligible Training Provider List or through competitive procurement by SDWP. Because not all courses offered by an eligible training provider may count toward the credential attainment indicator, YSPs must collaborate with industries to understand what credentials an industry requires for employment or career advancement.

A variety of different public and private entities issue recognized postsecondary credentials. Below is a list of the types of organizations that award recognized postsecondary credentials, however, not all credentials offered by these entities meet the definition of a recognized postsecondary credential:

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

- FAA aviation mechanic certification; or
- State certified asbestos inspector.
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons;
- Job Corps centers that issue certificates; or
- Institutions of higher education, which are formally controlled, or have been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes.

a) **Credential Verification**

YSPs 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 CalJOBS.

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 attached case note. When the documentation is received, include it in the participant's case file and update the attached case note with the date it was received.

2. Secondary School Diploma or Equivalency

Diplomas, or equivalent, include California recognized diplomas issued by a California public school, as well as by private schools accredited by the Western Association of Schools and Colleges or equivalent regional accreditation body. The requirements of a secondary school diploma are outlined by the CDE.

A secondary school equivalency certification indicates that a student has completed the requirements for a high school education. California has approved the use of three high school equivalency tests (HSET): GED®, HiSET®, and TASC™. These tests are for students 18 years old and older (17 years old in some instances). Those who pass the California High School Proficiency Examination (CHSPE) are awarded a Certificate of Proficiency by the California State Board of Education.

Documentation of Secondary School Diploma or Equivalency

- A copy of the diploma or equivalency certification must be kept in CalJOBS.
- The participant must also be employed (placement) or enrolled (placement) in a postsecondary program leading to a recognized postsecondary credential in any reporting period quarter

Note: When documenting the attainment of a high school diploma or equivalency, 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 attached case note. When the documentation is received, include it in the participant's case file and update the attached case note with the date it was received.

3. Credential Attainment Limitations

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.

While some HSET preparation programs may issue “diplomas or certificates” of completion, these documents are not genuine high school equivalency credentials. There are various HSET preparation programs available for free through the California Adult Education Provider Directory.

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.

Examples that **DO NOT** meet the postsecondary credential definition include the following:

- Occupational Safety and Health Administration 10 hour course that provides awareness of job-related common safety and health hazards.
- Cardiopulmonary resuscitation (CPR) training.
- Basic food preparation and hygiene certificate.
- An assistive technology training program such as screen reading software.
- Orientation and mobility training.
- Work or Career Readiness Certificate.
- National Career Readiness Certification (NCRC).
- National Retail Federation Credentials.
- ServSafe Food Handler's Certification.

4. Repetition of Exams and Courses

If a participant must repeat/retake an exam or course in order to successfully complete the program, the subrecipient must have prior written approval from their Program Specialist if the exam or course is paid for using WIOA funding. Appropriate documentation and approval should be kept in the participant case file and noted using an attached CalJOBS case note under the corresponding activity code.

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 Youth participants must be based on the Youth's individual service strategy. 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 & 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).
 - a) Progress report showing the attainment of an established milestone from an employer or training provider within the reporting period.
 - b) 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.

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 to goals/objectives on the youth's ISS must be kept in CalJOBS.
- 1) Completed Literacy Numeracy Records in CalJOBS for both Pre and Post Test and original answer sheets kept in the participant's file as indicated in Educational Functioning Level (Literacy/Numeracy), and applicable dates
 - 2) Measurable skills gain entered into CalJOBS and a copy of the secondary school diploma or equivalent dated before program exit
 - 3) Measurable skills gain entered into CalJOBS and a copy of the secondary or post-secondary transcript/report card indicating the number of credit hours, applicable dates, and passing grades/credits
 - 4) Measurable skills gain entered into CalJOBS and **ATTACHMENT - PROGRESS REPORT FORM**
 - 5) Measurable skills gain entered into CalJOBS and a copy of the passed exam

2. MSG Limitations

- Certificates/credentials used for Credential attainment may not be used to document an MSG, except for MSG #2.
- A WIOA subsidized work experience cannot be used to document an MSG

F. Effectiveness in Serving Employers

There are three 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 with 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.

Refer to **SDWP Operations Manual, Chapter 11: Business Services Policies & Procedures** for more information.

G. Exclusionary Exits

Participants can be excluded from the performance measures, at the time of closure, for any of the following exclusionary exits 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

YSPs 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 POLICY

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 customers. 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](#) 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. ATTACHMENTS

[Corrective Action Plan](#)

[Quarterly Narrative Report](#)

[Progress Report Form](#)

[Request for Dual-Enrollment Form](#)

[Youth Participant File Monitoring Checklist](#)