

# **OPERATIONS MANUAL CHAPTER 4. PART 2: TITLE I WIOA YOUTH PROGRAM ACTIVITIES**

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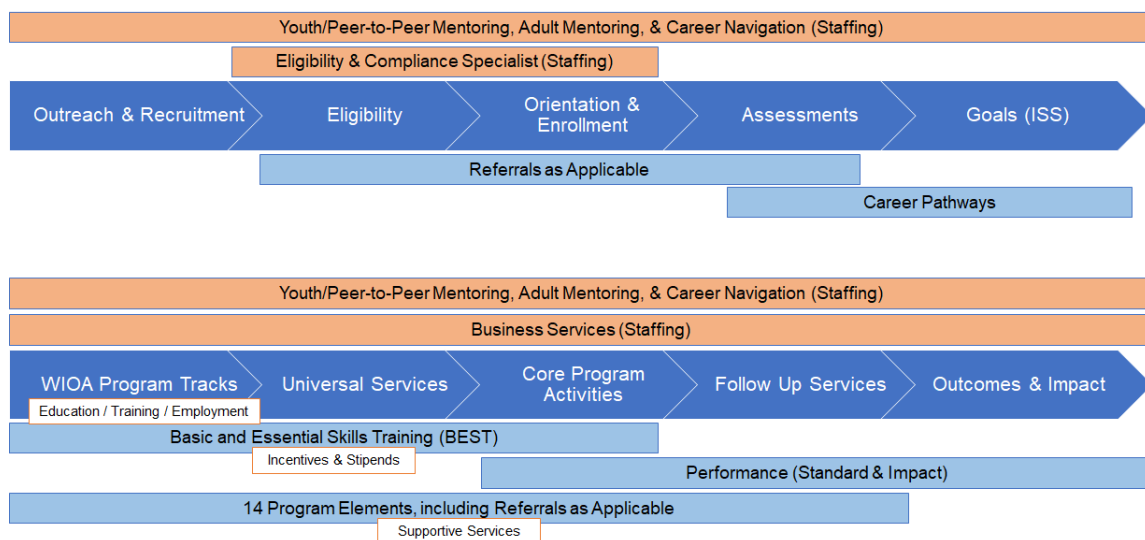
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## I. INTRODUCTION

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 Youth Requirements

Guidelines and requirements of the SDWP's WIOA Title I Youth Programs 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](https://wdr.doleta.gov/directives/all_advisories.cfm)

d) *The Code of Federal Regulations (CFR)*

<https://www.ecfr.gov/> - The Code of Federal Regulations (CFR) is the official legal print publication containing the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government.

e) *EDD Directives*

[http://www.edd.ca.gov/jobs\\_and\\_training/Active\\_Directives.htm](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_Draft_Directives_Closed_for_Comment.htm)

[http://www.edd.ca.gov/jobs\\_and\\_training/View\\_and\\_Comment\\_Open\\_Directives.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](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: Title I 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.

## C. 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.

## D. 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 via workforce.org.

### 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 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.

## E. Workforce eFile

Various participant documents must be managed electronically through Workforce eFile. The Workforce eFile system is a secure, web-based document management system that provides a process for subrecipients to conduct eligibility and provide file documentation for services remotely or in-person. Participants will be able to acknowledge/sign receipts, as well as upload required documentation from their phone or computer. The Workforce eFile Web Access User Guide is an instruction and guidance manual on how to track supportive services through the Workforce eFile. The user guide is located in the Operations Resources section the SDWP website (<https://workforce.org/operations/>).

## F. Participant File Documentation

All participant files must be kept electronically by following the processes outlined in the Operations Manual and using both CalJOBS and Workforce eFile. 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. Documents uploaded to CalJOBS and Workforce eFile must be labeled accurately for monitoring purposes. Mislabeling or non-labeling of documentation may result in program monitoring findings.

### 1. Data and Documentation Change Requests

For changes to participant file documentation or data entry in CalJOBS, subrecipients must follow the Data Change Request process in ***SDWP Operations Manual, Chapter 5: CalJOBS Data Entry Policies and Procedures***.

For data changes to participant file documentation in Workforce eFile, subrecipients must note the reasons for the change in Workforce eFile and submit the change request through the system or email the Compliance Analyst for approval. Changes could result in monitoring findings and/or disallowed costs.

## G. 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 (via Workforce eFile) 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.

## H. Record Retention

WIOA record-retention requirements dictate that participant hard copy files, must be maintained and made available, if requested, by the SDWP or state /federal funding sources for a period of four (4) years from the 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.

## I. 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.

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

### Process

- Complete any required forms to document the WIOA program activity;
- If there is medical or disability-related information indicated on any of the forms/documents, those forms/documents must be kept in the secure location in Workforce eFile by checking “***This document contains Personally Identifiable Information (Medical, SSN, etc.)***” or if the forms/documents are uploaded into CalJOBS, the PII file would remain secure.

### 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 must provide access points throughout San Diego County and must have, at minimum, a main office/location, and satellite locations or other strategies to provide access points for communities identified in the Subrecipient contract. **Access and locations should specifically address transportation, technology, and scheduling barriers.** For Career Center services, the Subrecipient must have at least one full-time staff person at each of the three main Career Center locations and have access points at the three affiliate sites, as outlined in the Contract. The locations should be easily accessible to members of the community, including parents or guardians of the participants. YSP should also adapt their services to provide remote and virtual access that is responsive to social distance mandates and virtual services.

### B. Orientation and Assessments

YSPs should conduct an orientation to inform youth about the WIOA program. As part of orientation, all youth must receive information on all available services to facilitate a highly effective enrollment process.

Subrecipients will enhance these strategies by conducting an Objective Assessment (OA) of academic level, skill level, and service needs of each participant to analyze and develop appropriate service strategies to meet individual needs and connect those needs to participant goals on the Individual Service Strategy (ISS).

### C. Partnerships & Referrals

Subrecipients are expected to demonstrate external partnerships with youth serving systems such as, local secondary schools and alternative education, school districts, higher education institutions including community colleges, law enforcement, juvenile and adult justice systems, local housing programs, community-based organizations, the County of San Diego's Health and Human Service Agency, mental health and counseling centers, employers, and other organizations that serve youth. Subrecipients are encouraged to refer youth to these programs as appropriate.

Subrecipients must also demonstrate how they will partner and collaborate with current American Job Centers of California (AJCC) Career Center Operator as well as other WIOA Youth Subrecipients. This will include providing county-wide workshops, trainings, and services as a "network-wide" service strategy to leverage resources and develop cohort-based learning, as well as refer and dual-enroll youth in multiple WIOA programs as part of a comprehensive case management system. The Workforce Partnership staff will facilitate regular meetings of providers to support collaboration and partnership.

#### 1. Referral Tracking

Subrecipients will be required to track both in-network (internal) and out-of-network (external) referrals through a combination of platforms, including CalJOBS and the Partner Portal.

#### 2. 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.*

Youth who do not enroll in WIOA programs should be provided information regarding other applicable and appropriate services available through other local community programs. In some cases, youth may be given referrals that facilitate further assessment or securing of basic needs to prepare them for eventual program participation.

## **D. Required Staff Positions**

YSPs must staff the following positions and corresponding functions. YSPs are encouraged to propose creative staffing structures that may include full-time dedicated staff, shared positions, multiple part-time staff or other designs that have proven to be successful in serving youth in the past. All staff must be trained to recognize trauma and mental health needs, incorporate trauma informed approaches in case management, and make appropriate emergent referrals when necessary.

### **1. Career Navigator**

The Career Navigator will provide case management for youth participants to facilitate the growth and development, participation in core program activities, and support achievement of performance outcomes. The Career Navigator will work in partnership with the Peer and Adult mentors and the Business Service Representative to provide a supportive and comprehensive case management strategy. Responsibilities will include, but are not limited to:

- Assisting with Eligibility, Registration, Orientation, Assessments, and Program Goals.
- Coordinating Core Program Activities (WIOA Youth Program Tracks) to prepare youth for post-secondary education opportunities, academic and occupational training, and/or employment.
- Coordinating/Co-Coordinating Universal Services and Basic and Essential Skills Trainings (BEST)
- Case Management Documentation.
- Coordinating Follow Up Services and Documentation of Performance Outcomes.
- ISY Career Navigators will build relationships and create referral strategies with secondary and post-secondary institutions.

### **2. Adult Mentor**

The Adult Mentor will provide support, motivation, and guidance to the Youth participants from recruitment through follow up and beyond. The primary responsibilities include providing one-on-one face-to-face interactions with a trusting adult to facilitate positive growth and development in partnership with the Career Navigator, Peer Mentor, and Business Service Representative. Adult Mentors will participate in Basic and Essential Skills Trainings, where required/appropriate. Adult Mentors can be paid staff, employers or community volunteers with similar lived experiences.

### 3. Peer Mentor

The Peer Mentor will be an age-appropriate (18-24) young adult that will provide support, motivation, and guidance to the Youth participants from recruitment through follow up. The Peer Mentor should be one of the first interactions during outreach, recruitment, eligibility, and registration. Peer Mentors should also be involved in conducting assessments and working in partnership with the Career Navigator, Adult Mentor, and Business Service Representative to coordinate and follow up on status of Youth goals. Peer Mentors can be paid staff or community volunteers. It is highly recommended that Peer Mentors be current (follow-up) or past participants and/or community members with similar lived experiences.

### 4. Eligibility, Compliance, and CalJOBS Specialist

The specialist should be the main staff assigned to conduct and verify eligibility in Workforce eFile, conduct internal monitoring and ensure compliance with the Workforce Partnership Operations Manual, understand CalJOBS system requirements, run CalJOBS reports and verify CalJOBS performance data. This person would also be the first point of contact for coordinating trainings with the Workforce Partnership, data change requests, and additional programmatic requirements in partnership with the Career Navigator and the Program Manager.

### 5. Business Service Representative (BSR)

BSRs primary functions are to engage industries and employers with both the program and participants and to coordinate all work-related activities. BSRs will secure internships, job shadow opportunities, employer driven occupational skills trainings, apprenticeships, work experience, and job placements. The BSR will work with the Adult and Peer Mentors and the Career Navigator as part of a comprehensive case management system. The BSR will coordinate the employer driven performance outcomes of Effectiveness in Serving Employers and Retention with the Same Employer. They will also act as the main liaison for the Career and Partner Portal system requirements.

Respondents' BSR staff will partner with the Workforce Partnership's Business Services Department as part of a business services collaborative to delineate roles. During contract negotiations, specific Business Services expectations and outcomes will be put in place. Subrecipients must budget sufficient BSR staff to serve youth at all Career Center locations.

## E. 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.

## F. Meetings, Trainings & Reports

YSPs shall send designated staff to attend and participate in all scheduled meetings and trainings for WIOA Youth Programs. Trainings will be posted on the **Partner Resources Website** and sent to the YSP Program Contact for distribution to YSP staff via Outlook Calendar or email. It is the YSPs responsibility to ensure their staff have access to applicable trainings, meetings, and reports (including Operations Manual Issuances).

Subrecipient shall be required to submit a **Quarterly Narrative Report** documenting progress on program and performance measures, 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. Quarterly narrative reports are due on the 10<sup>th</sup> of each month following the end of the most recent reporting period (quarter).

## G. Participant Payments

Participants may receive payments for program services via any method, including mobile payment services (i.e. Venmo, CashApp, PayPal, etc.) unless expressly prohibited in Cost Principles in 2 CFR part 200. WIOA funds may only be used to pay for the actual, itemized cost of the service and **cannot** be used to pay for any additional fees associated from using the service (i.e. gift card activation fees, transfer fees, withdrawal fees, etc.). YSPs must follow the documentation guidelines for participant payments under Supportive Services, Incentives, Stipends, and Work Experience. When using an electronic funds transfer or mobile payment service, the YSP must still document the payment being received by the participant (acknowledgement of receipt on the payment), as well as a copy of proof of payment (i.e. screenshot of payment) for documentation in the participant eFile.

The YSP will be responsible for tracking funds distributed and funds must be clearly managed and available for audit. Any funds distributed in error and not recovered will be a disallowed cost and cannot be charged to the grant. If the participant is paid more than \$600 of taxable income per IRS regulations, the YSP is responsible for providing necessary tax documentation to the participant (for stipends and wages).

### III. PROGRAM ENROLLMENT AND SERVICE STRATEGY

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). Subrecipients follow the plan to identify specific communities to conduct outreach and recruitment in their Contract.

#### B. Intake, Eligibility Determination & Registration

YSPs are responsible for determining WIOA Youth 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. 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: Title I 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: Title I WIOA Youth Eligibility**.

##### a) 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 any repeated services are part of the youth's goals/objectives on the ISS.

#### C. WIOA Youth Program Tracks

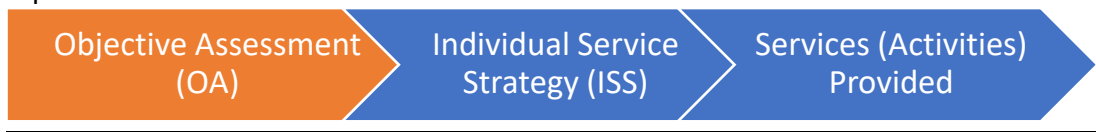
The Workforce Partnership has developed WIOA Program Tracks (**ATTACHMENT – WIOA YOUTH PROGRAM TRACKS**) that each eligible youth must enroll into as part of their program participation. All tracks include required core program services and outcomes based on the results of the Pre-Assessment on the needs and interests of the participant. Tracks must be used to plan and create goals for the Individual Service Strategy (ISS) by providing participants a clear plan for their services, including an overall program timeline, menu of available services, and program outcomes. Youth may switch tracks at any time based on updates to their Individual Service Strategy (ISS) or add services to their existing track. YSPs should show variety of track enrollments and coordinate services; accordingly. Track enrollment will be monitored and reported as an Enhanced Performance measure. Tracks are as follows:

- Track A: Education Only
- Track B: Employment & Experience
- Track C: Employment & Training
- Track D: Employment & Education

## D. Objective Assessment (OA)

YSP are required to provide an Objective Assessment (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.



### 1. Objective Assessment Guidelines

The YSP must mark **all** applicable barriers on the OA. The OA should inform eligibility, WIOA Youth Program Tracks enrollment, and the Individual Service Strategy (ISS) development.

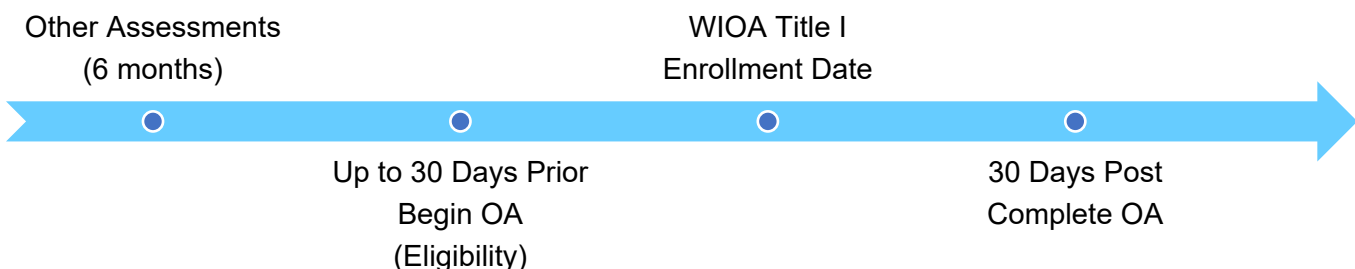
The OA must be conducted within 30 days prior or post enrollment and **must** be completed prior to providing program services. YSPs should use:

- Program Match Finder;
- Basic skills assessments, if applicable;
- Career interest assessments; - SDWP encourages the use of [Career Coach](#) and/or [My Next Move/Mi Proximo Paso](#) (Spanish Version) to identify occupations of interest
- Aptitude tests; and/or
- Personality tests

Additional assessments used must 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 completing an Objective Assessment within the timeframe noted above. 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 Process

### Partner Portal

- Create and complete an OA prior to providing program services - including issuing supportive services, incentives, stipends or work experience. The OA can be started during the eligibility process, no more than 30 days prior to enrollment.
  - The OA must include the information from the Program Match Finder questionnaire
  - Ensure that the OA has a corresponding WIOA application number and CalJOBS ID number
  - Ensure that all fields in the OA are completed within 30 days post-enrollment.

### CalJOBS

- On the WIOA participation form in CalJOBS select the appropriate OA code as the first activity.
  - Select the begin date as "Today."
  - Select the projected end date as "Today."
- *Close the OA activity code and mark the completion status.*
  - *Case note must include the status of the OA in the Partner Portal, (Complete/in progress);*
  - *Include any additional assessment results provided in the attached case note, including Educational Functioning Level (Literacy/Numeracy), if applicable; and*
  - *If the OA is closed as "In Progress", additional OA activity codes must be created and closed on each day the OA is updated until completed in the Partner Portal. The final activity code must indicate the day the OA was completed in the Partner Portal and included in the attached case note.*

## 2. 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. YSPs must follow instructions based on the test given, including any pre-test and post-test guidelines and recommended hours of instructional time between tests.

- [Test for Adult Basic Education \(TABE\)](#)
- [Comprehensive Adult Student Assessment Systems \(CASAS\)](#)

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. Resources:

- [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
- Include pre-test information on the Objective Assessment, if applicable
- Create an Objective Assessment activity code in CalJOBS. EFL tests must have their own OA activity code separate from the Objective Assessment.
  - *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 record in CalJOBS and enter the results of the pre-test

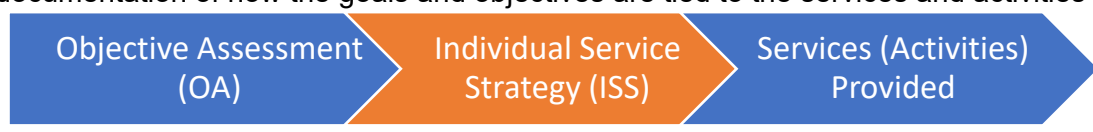
### Post-Test

- Complete post-test within one year of enrollment or prior to closure, whichever comes first.
- 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 of the post-test in the corresponding Educational Functioning Level record in CalJOBS

*For both online tests and paper tests, attach the original test results to the activity code and/or the MSG EFL entry for eFile documentation.*

## 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, work experiences, 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;
- Is directly linked to WIOA Youth Program Tracks;
- Is directly linked to Program Services; and
- Is directly linked to one or more of the indicators of performance that include education, training, 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 60 days, or sooner if necessary to document any progress made on the goals/objectives or to include a new goal, service, or activity.

## IEP/ISS Process

### At enrollment:

- The ISS should be the second activity opened, either concurrently or sequentially with the Objective Assessment.
  - 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 the ISS:

- YSP’s must update the ISS **at minimum every 60 days**, or as needed
  - Open a new ISS Activity Code each time the ISS is updated
  - 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 (*Examples include: Successful completion of a goal, update/change to a goal, adding a new goal, etc.*)
  - Close the new ISS activity on the date the ISS was revised and update the case note.
    - The case note must include the goals/objectives that were added, completed, and/or updated.

## 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 the participant’s case file. Right to work cannot be verified at eligibility, therefore it must be verified during participation. This requirement includes assistance with, but not limited to, paid and 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"> <li>• Self-service</li> <li>• Information only activities</li> <li>• Program referrals</li> <li>• Outreach</li> <li>• Intake</li> <li>• Orientation</li> <li>• Eligibility determination</li> </ul>	No	Cannot Verify
Basic Career Services: <ul style="list-style-type: none"> <li>• Staff-Assisted</li> <li>• Initial assessment</li> <li>• Job placement</li> <li>• Career counseling</li> </ul> <b>YOUTH JOB PLACEMENT</b>	Yes	May verify for activities such as initial assessment and career counseling
		<b>Must verify for job placement assistance</b> (referrals to jobs/employers, recruitments etc.)
Individualized Career Services  <b>ALL YOUTH EMPLOYMENT SERVICES &amp; ACTIVITIES</b>	Yes	May verify for activities such as occupational career counseling, aptitude testing, mentoring, and group counseling
		<b>Must verify for employment activities such as work experience, transitional jobs, internships, and pre-apprenticeship training</b> (referrals to jobs/employers, recruitments etc.)
Training Services	Yes	May verify for classroom training
		<b>Must verify for employment activities</b> (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)*.

### Work Authorization Process

If the first employment service is a work experience, refer to the Work Experience section.

- Refer to the I-9 Employment Eligibility Verification <https://www.uscis.gov/i-9> for acceptable right to work documentation.

### Workforce eFile

- Upload a copy of the documentation in the participant’s DocuBin on Workforce eFile. It must include a document from List A or List B and C.
  - The I9 Form is not required if the service is not a Work Experience

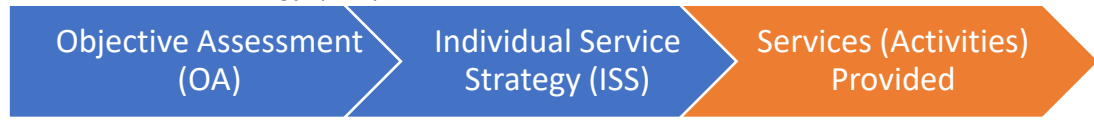
### CalJOBS

- Enter an attached case note on the **first employment service** with the title: **“RIGHT TO WORK VERIFICATION”** and include the types of documents collected from either List A or B and C.

#### IV. PROGRAM SERVICES

Program services are the core activities provided to the participant based on:

- WIOA Youth Program Tracks
- Objective Assessment (OA)
- Individual Service Strategy (ISS)



The primary focus of WIOA youth programs is education, training, and employment. As such, YSPs will be required to provide a minimum of one type of core service to each participant. YSPs must demonstrate the ability to provide all three core components:

**Educational Services.** Services must include instructional approaches that offer a continuum of skill, grade level, and developmentally appropriate educational options that connect to career pathways, including:

- Tutoring
- Study skills training
- Evidence-based dropout prevention and recovery strategies that lead to completion of a secondary school diploma or its recognized equivalent
- Post-secondary preparation, enrollment, and credential/degree attainment
- Alternative secondary school services
- Job shadowing and career exploration in field of study
- Other activities that prepare an individual to be successful in any secondary or post-secondary educational options.

**Training Services.** Services must include instructional approaches that offer occupational skills and education concurrently with training options that connect to career pathways, including:

- Classroom based occupational skills training
- Job shadowing and career exploration
- Eligible Provider Training List (ETPL)
- Youth Services Education Provider List (YSEPL)
- Apprenticeship training

**Employment Services.** Services must include approaches that offer work-based learning opportunities that connect to career pathways, including:

- Work experience
- Job shadowing and career exploration
- Internships
- Pre-Apprenticeships
- On-the-Job training

## A. 14 WIOA Youth 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 .
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. .

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.

If a YSP does not directly provide one of the program elements, it must demonstrate the ability to make seamless referrals to appropriate providers of such services. The funded provider will have primary responsibility for ensuring that each participant receives the full continuum of services. Refer to **TEGL 21-16 and EDD Directive WSD17-07** or clarifications on definitions and examples of qualifying activities under each category.

*a) Organized Field Trips and Events*

YSPs can use WIOA funds to pay for costs associated with field trips and events, so long as they are linked to the participating individuals' goals identified on their Individual Service Strategy (ISS) and are documented with a corresponding youth element and activity code. Funds used for these activities are budgeted as participant costs.

*Examples: Day trip to an employer for job shadowing (Activity Code 409)  
Civic engagement activities which promote the quality of life in a community (Activity Code 410)  
Field trip to an employer or education facility for Career Awareness (Activity Code 433)*

## **B. Basic and Essential Skills Training (BEST)**

Basic and essential skills have been identified as instrumental in overall program success, engagement, and impact to youth leading to self-sufficiency. SDWP developed a draft outline for BEST training that YSPs will enhance and implement. The BEST Course Catalog (**ATTACHMENT – BASIC AND ESSENTIAL SKILLS TRAINING**) includes topics from core WIOA track services, work-readiness training, labor market information (LMI), entrepreneurial skills training, and additional WIOA program services included in the 14 WIOA Youth Program Elements. All youth participants must be aware of and have the opportunity to participate in BEST, which would include service strategies around the 14 WIOA Youth Program Elements and subsequent stipends and incentives; however, BEST is not required for participation in the WIOA youth program.

### **1. BEST Configuration**

YSPs must include BEST topics offered through their organization (and any partners) in the "Course Configurator" on Workforce eFile to allow network participants to enroll in courses, receive stipends and incentives, and track progress and completion. All participants will have access to all training programs in the YSP network. YSPs are responsible for ensuring youth have access to the trainings (transportation, internet access, computer, or otherwise).



BEST trainings can be offered one of three methods:

- **Live** – In person at a designated location, date and time with a live instructor.
- **Webinar** – Online via a web-based platform (i.e. Zoom) at a designated date and time with a live instructor.
- **Video** – Pre-Recorded training video available via link (i.e. YouTube) that can be accessed at any time by the participant. Video trainings require the participant to complete a quiz related to the topic to verify attendance.

BEST trainings are configured in **units**. Each unit is equal to one hour of training. Trainings must be directly related to topics listed on the Best Course Catalog (**ATTACHMENT – BASIC AND ESSENTIAL SKILLS TRAINING**). YSPs will develop training content and provide a summary in the description.

## 2. BEST Participation Stipends

Youth will be paid for participation in up to 30 total units within the following BEST tiers. Refer to **ATTACHMENT –STIPEND & INCENTIVE POLICY** for participant payment requirements on stipends & incentives for BEST:

- **Tier 1 BEST** – A minimum of 15 units of paid training. Participants must complete at least one topic from each of the seven (7) categories.
- **Tier 2 BEST** – A minimum of 10 units of paid training. Participants must complete at least one topic from each of the seven (7) categories.
- **BEST Electives** – Electives are not required, however participants can enroll in additional training as identified on the Course Catalog and on their ISS.
- **Required Trainings (to receive the certificate and incentive)** are marked with an asterisk. These trainings are regarding career awareness, career pathways, priority jobs, and Labor Market Information (LMI). SDWP staff will develop the content for these trainings.

## 3. BEST Linkages to ISS Goals

Participation in BEST must be linked to the participants ISS goals to pay stipends for attending and participating in training, as well as receiving an incentive for completing training. BEST must be linked to the participant ISS goal for education, training, and/or employment through the appropriate activity code in CalJOBS. Goals are developed based on the results of the Objective Assessment. Participants should enroll in BEST trainings that:

- Address and alleviate barriers;
- Increase knowledge, skills and abilities;
- Prepare them for core WIOA services and performance outcomes;
- Provide the necessary skills for self-sufficiency; and
- Provide basic and essential knowledge for entering the workforce

*Note: Dual-enrollment is not required for BEST.*

## 4. BEST Outcomes & Incentives

Youth will receive a stackable work-readiness certification for completion of each of the tiers. YSP should use this certification to highlight skills on the participants resume, job applications, school applications, and other activities. Refer to **ATTACHMENT –STIPEND & INCENTIVE POLICY** for participant payment requirements on stipends & incentives for BEST. Participation in BEST must be completed prior to program closure.

## BEST Process

### Workforce eFile

- Enroll a participant in a course topic listed in Workforce eFile.
  - Participant course lists will be available to them on their participant app.
    - Course information, including date, time, location, and link (if applicable) will be available.
  - Some courses may require additional registration with the hosting provider (i.e Zoom). It is the Career Navigators responsibility to ensure the participant can access the training.
- In order to successfully complete each topic, their attendance must be certified:
  - For live and webinar trainings, an instructor must certify attendance (via email link) within 24 hours after the end of the training.
  - For video trainings, the participant must complete the corresponding quiz.
- Required documentation for participation and completion of topics and tiers will be automatically saved to the participant eFile DocuBin.

### CalJOBS

- Open the corresponding activity code on CalJOBS. The date of the activity code must match the date the participant took the training.
  - The appropriate code will be listed with the topic in eFile.
- On the attached case note, copy the following information from Workforce eFile:
  - Method of the training;
  - Name of the training;
  - Category and topic;
  - Description of the training;
  - Amount of stipends to be paid to the participant (based on units completed); and
  - Link to the participant goals identified on the ISS

#### *Example Case Note:*

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*Participant completed the webinar “What jobs are growing?” BEST training under Labor Market Information – San Diego Priority Jobs. The training showed the priority sectors and which occupations were growing within those sectors. Participant will receive \$20 for participating and attending two units. This is linked to the participant employment goal on the ISS.*

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- Close the activity code as successful completion.

For the process to pay stipends and incentives related to BEST training, refer to the Stipends and Incentives section below.



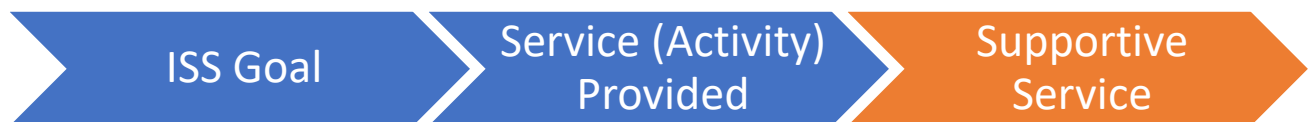
## C. Supportive Services

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

#### CalJOBS

1. Enter the appropriate activity code for the Supportive Service provided. The date of the Activity Code must match the date of disbursement in Workforce eFile.

1. *At minimum, the attached activity case note must include the following information:*

- *Description of the supportive service provided, including the related activity(ies) and ISS/IEP goal(s).*
- *Example: Transportation – Bus Pass for participant to attend adult education and tutoring for the goal of completing his/her GED and enroll in post-secondary.*

**Workforce eFile**

2. Complete Supportive Service log entry in Workforce eFile. The date of disbursement to the participant must match the date of the Activity Code in CalJOBS.
3. Subrecipient and/or the participant must upload the following documentation to Workforce eFile:

Bus pass	Gas card	Other checks, gift cards, other “cards”	All others
<ol style="list-style-type: none"> <li>1. Copy of both sides of the bus pass with serial number visible</li> <li>2. Written or eFile DocuVault confirmation of receipt of the bus pass from the participant</li> <li>3. Copy of the bus pass purchase receipt with the purchase date and total. If purchased in bulk, the corresponding serial number must be highlighted or circled</li> </ol>	<ol style="list-style-type: none"> <li>1. Copy of both sides of the gas card with serial number visible</li> <li>2. Written or eFile DocuVault confirmation of receipt of the gas card from the participant</li> <li>3. Copy of the gas card purchase receipt with the purchase date and total. If purchased in bulk, the corresponding serial number must be highlighted or circled</li> <li>4. Copy of the itemized purchase receipt of the gas purchase transaction from the participant. The itemized receipt must show, at minimum, the last 4 digits of the serial number</li> <li>5. The start and end addresses for distance determination for each trip to corresponding activity</li> <li>6. The odometer reading to calculate total mileage for each trip</li> </ol>	<ol style="list-style-type: none"> <li>1. Copy of both sides of the check, gift card or other type of card with serial number visible</li> <li>2. Written or eFile DocuVault confirmation of receipt of the check, gift card, or other type of card</li> <li>3. Copy of the itemized receipt with date, purchase detail, and total</li> </ol> <p style="color: #f4a460;"><i>If direct payment is made to the youth in advance of the purchase either through check, gift card, direct deposit, or digital funds transfer, or other type of card, the youth must provide an itemized receipt once the purchase is completed</i></p>	<ul style="list-style-type: none"> <li>• Copy of the itemized receipt with date, purchase detail, and total</li> <li>• Written or eFile DocuVault confirmation of receipt of the Supportive Service from the participant</li> </ul>

**2. Food Purchases**

Per, 20 CFR 680.900 and 200.403, food may be provided to eligible youth as a Supportive Service when it will assist or enable the participant to participate in allowable youth program activities and reach his/her employment and training goals. The following documentation is required specifically for food related purchases, in addition to the requirements in the “Supportive Service Process” above:

- Youth must be concurrently enrolled in a training, employment, or education activity that leads to a placement or attainment goal OR has a completed follow up form with a positive placement;
- The food cost must be reasonable and justified as necessary in order for the youth to participate in the program, maintain their placement, and/or receive services.

- a) *For the purchase of groceries:*
- Groceries can be provided to ensure youth can participate in scheduled employment, training or education activities, including as a barrier to those who are homeless or housing insecure.
  - Written confirmation from CalFresh that the youth is not eligible for food stamps/SNAP; and
  - The phone number and date of contact with a local food bank or other charitable entity to attempt to acquire food for the youth must be included as an attached activity case note.
- b) *For the purchase of food as part of an activity or training:*
- The activity must be four hours or longer and during a normal meal period.  
*Example: If you are requiring the participant to be in training or activity during lunch, lunch can be provided as a Supportive Service.*
  - For field trips and events related to a training, education, or employment goal and activity, food may be provided to participants for those that do not have any combination of the following:
    - The means (no disposable income);
    - The time (time to locate and buy food is limited), and/or
    - The distance and accessibility to food is limited (transportation is not available or was provided by the YSP).*Example: If a half day event to an employer site to do a job shadow or career exploration field trip was provided, and the participants were transported by the YSP, the YSP can provide food as a Supportive Service.*
  - For trainings or events related to a participant goal, the training or event must be during a meal period where the participant does not have the means, time, or limited transportation to access food.  
*Example: A short-term (one-to-three-hour training/event) would not justify the purchase of food.*

### 3. Missing Documentation and Receipts

**IF THE ABOVE DOCUMENTATION/RECEIPTS ARE NOT PROVIDED AND UPLOADED TO WORKFORCE EFILE, NO ADDITIONAL SUPPORTIVE SERVICES MAY BE PROVIDED WITHOUT WRITTEN APPROVAL FROM SDWP. MISSING DOCUMENTATION/RECEIPTS ON SUPPORTIVE SERVICES WILL RESULT IN DISALLOWED COSTS.**

#### **Missing Documentation/Receipts Process**

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

- Date of contact with the participant requesting the missing receipts/documentation and explain that no further supportive services will be provided until the missing receipts are received; and
- After notification, if the receipts are not provided within ten (10) business days, send a follow-up notice 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 notice must be kept in Workforce eFile and noted on the attached case note that the notice was sent.
- Requests to provide additional supportive services must come in writing to the Subrecipient's Program Specialist for approval. If approved, the written approval must be uploaded to Workforce eFile.

#### 4. 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.

#### D. Incentives

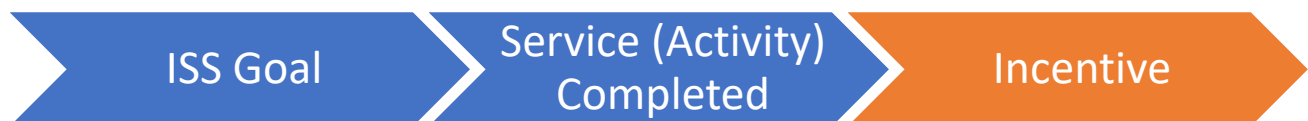
Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. Refer to **ATTACHMENT –STIPEND & INCENTIVE POLICY** for approved activities resulting in incentives.

##### 1. Incentive Guidelines

- Incentives may only be given to recognize an achievement or to signify completion of a training (including BEST certification), education, or work experience activity.
- Incentives may only be in the form of check, direct deposit, digital money transfer, 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.**
- WIOA funds may not be used to pay for fees related to incentives, including gift card activation fees and digital funds transfers.



## Incentives Process

### CalJOBS

1. Enter the appropriate activity code for the Incentive provided. The date of the Activity Code must match the date of disbursement in Workforce eFile.
2. *At minimum, the activity case note must include the following information:*
  - *Reason for the incentive payment, including the related activity(ies) and ISS/IEP goal(s).*
  - *Example: Incentive paid for completion of adult education program and receipt of GED.*
  - For BEST: *Incentive paid for completion of BEST Tier 1 and attainment of the training certification as part of the goal of placement in employment.*

### Workforce eFile

2. Complete Incentive log entry in Workforce eFile. The date of disbursement to the participant must match the date of the Activity Code in CalJOBS.
  - For BEST, confirm the tier completion and authorize the incentive for payment.
3. Upload the following documentation to Workforce eFile:
  - Copy of check, gift card with serial number visible, or proof of direct deposit or digital funds transfer
  - Written or eFile DocuVault confirmation of receipt of the incentive from the participant

## E. 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 (or BEST units) of attendance and participation as documented on the attendance sheet. 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. Refer to **ATTACHMENT –STIPEND & INCENTIVE POLICY** for the list of allowable stipend activities, maximum hours, and hourly amount.

### 1. 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;
- Stipends shall not be disbursed until the participant meets all stipulated requirements and contractor staff verifies the attainment of the program outcome(s); and
- Stipend payments must be in accordance with the requirements contained in [2 CFR part 200](#).
- **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 may be paid for virtual/online participation.

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>



## Stipend Process

### CalJOBS

1. Enter the appropriate service activity code for which the Stipend was provided. The stipend must be documented on the CalJOBS activity code.
3. *At minimum, the activity case note must include the following information:*
  - *Attached activity case note must be labeled: “**STIPEND PAYMENT – [DATE]**”*
    - *There must be one attached activity case note for each payment of a stipend based on the approved stipend policy and guidelines, when applicable.*
  - *Reason for the stipend payment, including the related activity(ies) and ISS/IEP goal(s).*
  - *Example: Stipend paid for hourly attendance in adult education to obtain GED.*
- *BEST Stipends must be documented under the pre-designated activity code in eFile*
  - *Attached activity case note must follow the guidelines above.*
  - *For BEST: Stipend paid for two units of participation in the Work Readiness – Introduction to Essential Skills training*

### Workforce eFile

2. Complete Stipends log entry in Workforce eFile. The date of disbursement to the participant must match the date of the attached activity case note in CalJOBS.
3. Upload the following documentation to Workforce eFile:
  - Signed/instructor verified time sheets or attendance sheets. Time/attendance sheets must note the start and end times to calculate and verify hours or units attended; and/or
  - Successful completion of a quiz of the materials for training videos (BEST only);
  - Proof of payment by either a copy of the check, pay stub, direct deposit or digital funds transfer, or ledger if none of the other proof of payments are available, and;
  - Written or eFile DocuVault confirmation of receipt of the stipend from the participant
4. Upload the following documentation for the following classroom-based stipends:

#### **BEST**

- For BEST, confirm attendance and authorize the stipend for payment.

#### **School Attendance**

- 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

#### **Occupational Training Attendance**

- Copy of certificate of attainment verifying completion of occupational/ technical skills, or pre-apprenticeship skills/trades training, if applicable



## 2. 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. These should be made available when requested

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*

## 3. Stipends as Taxable Income

Stipends that exceed \$600 or more in a calendar year are considered taxable income and the subrecipient is required to provide the participant appropriate tax forms in order to complete their annual tax returns.

## F. 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). 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.

Work experiences may include the following:

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



b) *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.

c) *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.

d) *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 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.

YSPs must utilize the following policy regarding OJTs: ***SDWP Operations Manual, Chapter 4, Part 1: Attachment - On-the-Job Training Policy and Procedures and Exhibits.***

## 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.

h) *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.

### 3. *Work Experience Expenditure Requirement*

WIOA requires YSP to spend at least 25% 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.
- Approved incentive (and stipend, if unpaid) policy pertaining to the work experience.
- Pay rate: At least minimum wage, which may vary by City.
- The Work Experience must be documented on the ISS under the specific goal/objective related to the participation in the activity.

*b) Subsidized Work Experience Limitations*

- Duration: Maximum 240 hours per subsidized work experience
- More than 240 hours requires written approval from SDWP.
  - For approval for extension, the work duties being assigned and the work experience gained from the internship would require that the participant to be there longer than 6 weeks before finding permanent employment. An example of an approved extension would be if the participant was required internship hours to obtain a certification or if the workplan showed measurable skills that go beyond the cap.
- A work experience cannot be used to document an MSG

*c) 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).

*d) 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, supervisor name, and supervisor contact information;
- Job title;
- Description of main job responsibilities;
- Length of work experience; and
- Hourly rate

*e) Timesheets*

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)

*f) Participant Evaluation*

Employers must document the overall progress of the participant as outlined in the Worksite Agreement & Training Plan at the completion of the work experience. YSP's may use the **ATTACHMENT - PARTICIPANT EVALUATION & PROGRESS REPORT FORM**, develop their own progress report, or use an employer report so long as it contains the required evaluation information. At minimum, the evaluation must include:

- Participant name;
- Work site organization name, supervisor name, and supervisor contact information;
- Evaluation of milestones on the plan;
- Attendance & timeliness
- Participant engagement
- Skill development
- Work habits and task completion
- Communication skills
- Appearance

*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:

- Adherence to the plan;
- Worksite conditions;
- Overall effectiveness of the work experience, and
- Feedback from the participant.

**5. Work Experiences as Taxable Income**

Work experiences are considered wages paid and the appropriate taxable withholdings must be made on each work experience payment based on the W-4. The subrecipient is also responsible for providing the participant year-end tax documentation in order to complete their annual tax returns.



## Work Experience Process

### CalJOBS

1. 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 dates.
  - *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 and total hours*
    - *Start date*
    - *Funding source: WIOA, non-WIOA, Youth Build, County of San Diego, employer paid, etc.*
    - *Date of Employer/Worksite Orientations*
  - A second activity case note at the completion of the Work Experience with an employer evaluation.

### Workforce eFile

2. Provide the following initial documentation in the Work Experience log on eFile:
  - Work Permit for Minors (if applicable);
  - Completed I-9;
  - Completed W-4 Employee's Withholding Allowance Certificate;
  - Worksite Agreement and Training Plan;
3. Provide the following documentation for **each** work experience payment in the participant eFile:
  - Timesheets for the corresponding pay period;
  - Proof of payment by either a copy of the check, pay stub, direct deposit or digital funds transfer, or ledger if none of the other proof of payments are available; and
  - Written or eFile DocuVault confirmation of receipt of the payment from the participant
4. Provide the following documentation at the completion of the work experience in eFile:
  - Written participant evaluation of the work experience by the employer.

## G. Training Services

Eligible youth can access training funds only through dual-enrollment through the AJCCs, unless specifically budgeted in the **Subrecipient Contract - Budget**. YSPs must follow **SDWP Operations Manual, Chapter 4, Part 3: WIOA Title I Training Services** for all Title I training programs, regardless of funding source used. Additionally, the training program must be approved and published to the Partner Portal by SDWP. YSPs can request training programs be added to the Partner Portal by emailing [WIOATrainings@workforce.org](mailto:WIOATrainings@workforce.org).

## **V. 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 staffing model of Required Staff Positions 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**

YSPs must provide services to a participant for the amount of time necessary to ensure successful preparation to enter postsecondary education and/or unsubsidized employment. There is no minimum or maximum time a youth can participate in the WIOA youth program. A participant's duration in the program should be based on the participant plan as written in the ISS. Services should be timely and consistent, with the goal of placement in education, training and/or employment within a reasonable timeframe. Participation cannot be tied to contract timelines or program years.

### **B. Active & Consistent Engagement with Participant**

YSPs should engage participants 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. Services Provided Requirements**

Youth are expected to have weekly engagement in services/activities, either active in one-day or long-term activities. At minimum, YSPs are required to facilitate monthly services/activities (every 30 days). Subrecipients are strongly encouraged to develop comprehensive engagement strategies to ensure program retention. A cohort model to deliver services is strongly encouraged to allow for peer-to-peer support and engagement, as well as promoting collaboration between WIOA partners to leverage resources and provide network-wide trainings/activities to participants. Partners must demonstrate their ability to manage caseloads through a combination of their staffing plan and the solutions proposal.

#### **2. ISS Updates**

YSP's must update the ISS every 60 days, or sooner if necessary to document any progress made on the goals/objectives or to include a new service or activity.

#### **3. 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 File Content

YSPs must maintain electronic copies of participant eligibility, program, and closure documentation within Workforce eFile and CalJOBS.

### 1. Intake & Eligibility Documentation

The following is required:

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

- Pre-Assessment results;
- 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 (MCRF).

### 2. Program Documentation

The following is required:

- Objective Assessment and other assessment results; and
- Basic and Essential Skills (BEST) Documentation
- Incentive Documentation (BEST)
- Stipend Documentation (BEST)

The following is required, if applicable:

- Educational Functioning Level (Literacy/Numeracy) Assessment Pre-Test and Post-Test;
- Supportive Service Documentation
- Work Experience Documentation

### 3. Closure Documentation

The following is required, if applicable

- **ATTACHMENT - PARTICIPANT EVALUATION & 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 or Sector Initiatives

SDWP encourages the Subrecipients to leverage resources, including using co-enrollment, to ensure participant success. No prior authorization is required for co-enrollments.

### 2. Dual-Enrollments

Eligible participants may be dual-enrolled into two or more WIOA Title I programs. 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.

- The **ORIGINAL** Provider is the provider who has completed pre-screening and WIOA eligibility for the participant; this provider will initiate the dual enrollment process
- The **REQUESTING** Provider is the provider requesting enrollment into their program as a benefit to the participant. The original provider may have sent a referral for dual enrollment to the requesting provider.
  - *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 Workforce eFile and on the participant ISS 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.

#### 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

1. The **ORIGINAL** service provider will submit **ATTACHMENT - REQUEST FOR DUAL-ENROLLMENT** in Workforce eFile to the **REQUESTING** service provider and their Program Specialist for approval and acknowledgement of distribution of services.
2. The **ORIGINAL** provider must keep the form in the DocuBin, once approved.
3. The **REQUESTING** service provider will conduct eligibility for their program.
  - Every effort should be made to use eligibility documentation from the original provider.
4. Once completed, 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 the activity on the same day.
5. 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 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 related 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 youth are 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.

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.

### 1. 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.

### 2. Follow Up Documentation

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

### 3. 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.

## VI. PERFORMANCE

WIOA requires a comprehensive accountability system to determine the effectiveness of services provided through the YSP network. Performance is broken into four categories: Youth Enrollments, Active Youth Services, WIOA Youth Contract Spending Analysis, and WIOA Performance Measures.

### A. Youth Enrollments

Each YSP has enrollment targets identified in **Subrecipient Contract – Attachment – Program Design Summary** in order to meet local requirements on cost per participant and ensure community needs for services are being met by our programs.

### B. Active Youth Services

Active services include Services Provided Requirements (including 90 day no service), Data Entry (Late Data Entry), and Measurable Skills Gain (MSG). These performance measures are recorded and analyzed based on youth who are still active in the program.

### C. WIOA Youth Contract Spending Analysis

Based on federal, state and local requirements, an analysis of spending has been included in the performance accountability system, which includes the following:

- Expenditures vs. Budget
- Cost Per Participant
- Participant Cost of Total Budget
- In-Kind/Cash Match of Total Budget
- Staffing Cost vs. Budget
- Support Costs of Total Budget
- Work Experience of Total Budget
- Submission of Invoices for Spending Accountability/Tracking and Cost Reimbursement (Late Invoices)

### D. WIOA Performance Measure Definitions

Definitions needed to understand WIOA performance and the mechanisms for calculation the six primary indicators of performance, including definitions, are found in [WSD22-01](#), “Performance Guidance.” These performance measures are recorded and analyzed based on youth who are in Follow Up Services. 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

### E. 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.

#### **F. 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.

#### **G. 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 9<sup>th</sup> 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](http://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](http://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.)
- Verify that the certificate or credential meets the definition for WIOA attainment: <https://wioacredentialtool.safalapps.com/>

**Documentation of Credential Attainment**

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

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

a) *WIOA Funded Non-Credentialed Certifications*

WIOA funds can be used to pay for any and all short-to-mid-term credentials, including those listed above that do not meet the definition of a post-secondary credential (under Credential Attainment Limitations) to support the participant meeting their employment goals identified on their Individual Service Strategy (ISS). Any short-to-mid-term credentials that do not meet the definition of a post-secondary credential must be documented using Activity Code 417 – Comprehensive Guidance and Counseling under description #1 & #3 – preparation for post-secondary education, training, and/or unsubsidized employment opportunities. The attached case note must include a description of the training received and any applicable certifications.

#### 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.

#### H. 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 the participant's file.
- 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 - PARTICIPANT EVALUATION & 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

## I. 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.

## J. 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



## VII. PERFORMANCE REPORTING

### A. Reporting Timeline

Performance measures are reported to YSPs by SDWP on a quarterly basis. The timeline for data entry, report submissions, data validation, and corrective action for YSPs and SDWP can be found in **ATTACHMENT – WIOA YOUTH PERFORMANCE REPORTING TIMELINE.**

#### 1. CalJOBS Performance Data Entry

Performance data, including applicable MSGs, Credential Attainments, and Placements indicated on follow up forms and other sections of CalJOBS, must be entered by YSPs by the **FINAL DAY OF THE REPORTING QUARTER.** YSPs will not have the additional seven calendar days to enter performance data that is allowed to document service activities in order to count towards performance targets. Any performance data entered late (after the last day) would be captured during the following reporting period (quarter).

#### 2. Performance Inquiries

YSPs are responsible for tracking their own performance on a regular basis (recommended monthly) through CalJOBS predictive reports, as well as internal expenditure analysis. Once performance reports are released by SDWP, YSPs can submit an inquiry if they feel there is a discrepancy between their performance analysis and the published performance by SDWP and are requesting a revision.

#### Performance Inquiry Process

YSP must submit in writing (email) by noon on the third business day after receipt of reports:

- The performance measure(s) in question
- The published performance and the requested revision for each inquired (actual numbers and percentage)
- Supporting documentation and/or copies of the reports ran by the YSP to support the inquiry attached to the email. *Inquiries without supporting documentation or reports to support the revision will not be considered.*
- *Late submissions of inquiries will not be considered*

### B. 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.

### C. Performance Measures

Refer to **Subrecipient Contract - Attachment** for the approved Program Performance Measures.

### D. Corrective Action Policy

YSPs not meeting one or more areas of performance may be placed on Corrective Action in order to document the plan and progress towards meeting program performance goals. The corrective action policy and process can be found in **SDWP Operations Manual, Chapter 2: Contract Administration.**

## **VIII. ATTACHMENTS**

**Basic and Essential Skills Training (BEST)**

**Stipend & Incentive Policy**

**Participant Evaluation & Progress Report Form**

**Request for Dual-Enrollment**

**WIOA Youth Performance Reporting Timeline**

**WIOA Youth Program Tracks**