



## **WDB CASE MANAGEMENT POLICY**

Approved by the Full Western Wisconsin Workforce Development Board

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## **INTRODUCTION:**

These guidelines apply to WIOA Adult, Dislocated Worker, and Youth Programs. These guidelines are to be used in context with the Department of Workforce Development's (WIOA) Titles I-A and I-B Policy & Procedure Manual, which can be found online at <https://dwd.wisconsin.gov/wioa/policy/>. Any changes in this Department of Workforce Development's Manual take precedence over these guidelines. If discrepancies are found, please direct them to the Western Wisconsin Workforce Development Board at [scarborougha@westernwdb.org](mailto:scarborougha@westernwdb.org). **All Career Planners are responsible for knowing the DWD policy and the information in this WDB Case Management Policy.**

## **SECTION 1 – EFFECTIVE CASE MANAGEMENT**

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Career Planners carry out critical activities: assessment, career planning, coordination of supportive services, job matching, placement, and follow-up. Suggestions for making these activities as effective as possible are discussed in detail below.

The WDB expects Career Planners to possess the knowledge, skills, and abilities to work effectively with participants in a manner conducive to successful outcomes. If a Career Planner is to serve as a mentor, coach, and counselor, he or she needs to develop a successful relationship with the customer. Strong interpersonal communication skills are essential in this process.

### Effective Interviews

Effective Interviews help the Career Planner understand the customer's current situation, immediate needs, goals, strengths, and challenges. Use of the following methods can increase the effectiveness of interviewing:

- Asking open-ended questions. Engage the customer in a conversation, and invite him or her to share more information by asking questions that can't be answered with just a simple "yes" or "no."
- Probing. Ask questions designed to gather additional information about a topic or to follow up on customer statements.
- Avoiding judgments. Refrain from expressing judgment (verbally or nonverbally) during interviews and adopt a nonjudgmental attitude.
- Being sensitive to body language. Be sensitive to the customer's nonverbal responses, as a complement to carefully listening to what the customer actually says.

### Developing Rapport

Strong rapport enables the Career Planner to connect with the customer and to understand his or her goals and challenges. Relating to the customer and encouraging him or her to share goals sets a positive, collaborative tone for all interaction. The following methods assist in establishing rapport:

- Relating as partners. Make collaboration and shared responsibility the basis of the relationship.
- Mirroring. Match speech and body language—such as tone, tempo, and inflection—during conversations.
- Showing enthusiasm. Show genuine interest and enthusiasm in the conversation by being present and attentive to what is being said.

### Ensuring Confidentiality

Assuring the customer that his or her statements will be kept confidential is an important part of building trust and open communication. The Career Planner should do the following to ensure confidentiality:

- Converse in a private environment. Provide a physical space that invites the customer to share personal information without the possibility of others overhearing.
- Protect documents. Keep documentation confidential, ensuring that only authorized persons have access to customer information. See Section 16 for more information about the confidentiality and protection of records.
- Maintain privacy. Share customer information or discuss the customer's situation only with those involved in the customer's service strategy.
- Any medical documents must be maintained separately, in a secure location. See DWD Policy 5.7 Collection and Maintenance of Medical and Disability-Related Information for details.

### Active Listening

By validating a customer's experiences and point of view, active listening during formal and informal conversations helps build the customer's self-esteem. And to the extent that it helps build trust and establish openness, active listening can also provide the Career Planner with useful information about the customer's goals, roadblocks, and social system (such as relatives, friends, neighbors). Active listening involves using the following techniques:

- Restating and paraphrasing. In your own words, feed the customer's statements back to him or her to assure both of you that the customer has been understood.
- Clarifying. Ask questions that help clarify what the customer has said.
- Reflecting. Use information provided by the customer to clarify links between stated goals and the intended course of action or career path.

### Motivating, Supporting, and Empowering

The Career Planner needs to be able to motivate, support, and empower the customer throughout his or her time in the program. The following strategies may help to accomplish this:

- Leveraging motivators. Identify the strengths, core values, and dreams that motivate the customer, and use these to generate optimism and keep the conversation positive.
- Focusing on successes. Praise successes, especially small ones, and re-define failures as partial successes and learning opportunities.
- Empowering the customer. Help customers learn to see themselves as their own best resources.

## **WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)**

The Workforce Innovation and Opportunity Act (WIOA) is landmark legislation that is designed to strengthen and improve our nation's public workforce system and help get Americans, including youth and those with significant barriers to employment, into high-quality jobs and careers and help employers hire and retain skilled workers.

<https://www.dol.gov/agencies/eta/wioa/>

## **WIOA APPLICATION PROCESS**

Any time that it becomes known that a customer could benefit from either WIOA services or services outside of WIOA, Career Planners must refer customers to those services. Additionally, all interested individuals must be allowed to apply for WIOA, without time delays or other requirements imposed by service provider staff.

If an applicant requires accommodations because of a disability, arrangements must be made for the needed accommodations without time delays so the applicant can complete an application form as soon as possible. These forms must be marked as confidential when uploading to the ASSET Documents. If any printed copies of these documents are retained, they must be kept in a separate locked or otherwise secured location.

All applicants with Limited English Proficiency (LEP) must be given forms in their preferred language, free of charge.

All applications received must be entered into ASSET, even if they are determined ineligible for WIOA. The information must be entered into ASSET in Manage Programs, Manage Services (Eligibility Determination), and Manage Customer Notes. For all applicants, complete the eligibility determination and close an Eligibility Determination service in ASSET no more than 30 calendar days after the date the application form was submitted. The WIOA service provider must record the date of submission on the application form or in an ASSET case note. ASSET entries must be completed within 10 business days.  
<https://dwd.wisconsin.gov/wioa/policy/08/08.2.301.htm>

Service provider staff must attempt to contact applicant within 30 days and enter in case notes.

## **REFERRALS**

When it becomes known that a customer could benefit from services from another service provider, being another WIOA program, or outside of WIOA, a referral is to be made to increase resources for the customer. A Release of Information form should be completed so that the customer authorizes the sharing of information.

Referral methods may include:

- 1) Completing an Internal Referral Form as fully as possible and emailing to staff at the organization receiving the referral.
- 2) Warm referrals, where the Career Planner brings the customer to meet the representative of the other program or sets up a phone call to introduce them. When possible, this is always the best choice, and can be done in addition to other referral methods.
- 3) Using the Comprehensive Employment Planning Toolkit (CEPT) Community Resources widget to inform the customer of the services available. This method allows the customer to view the referrals when they login to their JCW account at <https://jobcenterofwisconsin.com/>.
- 4) Providing other information to the customer to research on their own.

When referring between WIOA Adult/DW and WIOA Youth, referral method #1 MUST be used and the WDB Operations and Compliance Specialist should be given a copy of the referral.

## **MEDICAL OR DISABILITY-RELATED INFORMATION**

Any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, must be collected on separate forms. All such information, whether in hard copy, electronic, or both, must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential. Whether these files are electronic or hard copy, they must be locked or otherwise secured (for example, through password protection).

Must check confidential checkbox for all case notes that could lead to a disclosure of a disability. DWD-DET recommends that, whenever possible, career planners record relevant information about the effects of an individual's medical impairment, rather than his or her actual medical diagnosis. For example, career planners can record the following information without disclosing an individual's medical or disability-related information:

- cannot lift more than 20 pounds;
- cannot sit for more than an hour;
- must take frequent breaks; and
- will be unavailable during the next six weeks.

Examples of medical/disability information that must be secured separately, include, but are not limited to items such as:

- pregnant;
- headaches;
- depression;
- referrals to DVR programming
- addiction; and
- diabetes.

DWD-DET requires that all discussions between career planners and individuals are conducted confidentially. Career planners working with individuals with disabilities must obtain permission from the individual before disclosing information about his or her disability with others. This policy does not limit an individual's voluntary disclosure of medical and disability-related information.

<https://dwd.wisconsin.gov/wioa/policy/05/05.7.htm>

Release of Information forms must be:

1. Private and Secure. Information will be held in strict confidence in a manner that ensures its privacy and security at all stages of processing.
2. Purpose Intended. Information shared will be used only for the purpose for which it was provided and in accordance with the (mission of the company or program) and/or (applicable state laws).
3. Further Disclosure. Once the information is no longer needed for the purposes intended, it will be stored in the customer's confidential personal file and will not be further used or disclosed.

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## **SECTION 2 – ASSET AND CEPT**

The case management database for WIOA in Wisconsin is the *Automated System Support for Employment and Training (ASSET)*. It is the system of record for pertinent participant-related

information including eligibility, service provision, case notes, and performance reporting. In addition, the files uploaded to the ASSET Documents are the official case file. All WIOA related participant activity must be entered in ASSET.

The ASSET Users Guide and the DWD WIOA Policy & Procedure Manual should be used as the first sources for technical assistance regarding use of ASSET. These guides can be accessed at [https://dwd.wisconsin.gov/DETAPPS/detapps\\_info/secure/asset/user-manual.htm/](https://dwd.wisconsin.gov/DETAPPS/detapps_info/secure/asset/user-manual.htm/) and <https://dwd.wisconsin.gov/wioa/policy/>. Any questions not answered in these guides should be a request for technical assistance from the WDB. The WDB will monitor for accurate ASSET data entry and corresponding documentation in participant files. Please note that ASSET access must be granted to access these sites. To gain access, complete the DETS-10-E form, which can be downloaded at [https://dwd.wisconsin.gov/dwd/forms/dws/dets\\_10\\_e.htm](https://dwd.wisconsin.gov/dwd/forms/dws/dets_10_e.htm).

DWD Policy has required that certain documentation indicated in DWD Policy Manual Chapter 12 <https://dwd.wisconsin.gov/wioa/policy/12/> for all new enrollment beginning 10/1/2020 be stored in ASSET Documents. However, in Western Wisconsin WDA, local policy is to store the entire participant file in ASSET Documents for all active case 10/1/2020 and after. If files exited prior to 10/1/2020 are planned to be monitored, the service provider will be asked to upload any remaining documents not already uploaded to ASSET.

The *Comprehensive Employment Planning Toolkit (CEPT)*, is the system of record for:

- Individual Employment Plans (IEP) for Adult and Dislocated Worker programs
- Individual Service Strategies (ISS) for the Youth program
- Economic Self-Sufficiency (ESS) Calculator for the Adult and Dislocated Worker programs

Western Wisconsin WDB requires CEPT to be used for all employment plans (IEP/ISS) for WIOA programs. The tools interact with the job seeker's JCW account, so that the customer can accept and add comments to the documents. The CEPT Reference Manual is available at [http://wisconsinjobcenter.org/jcw/cept\\_ref\\_manual.pdf](http://wisconsinjobcenter.org/jcw/cept_ref_manual.pdf), or can be accessed through the Help link on the footer of the application. There are also videos at [http://wisconsinjobcenter.org/jcw/help\\_cept.htm](http://wisconsinjobcenter.org/jcw/help_cept.htm) and via the Help link within CEPT.

The data entered in ASSET and CEPT is expected to be accurate. It is important to document all barriers to employment so that:

1. Barriers are recognized and can be addressed as part of service delivery.
2. Participant characteristics can influence performance calculations positively, on account of the statistical adjustment model.

Data entry and document uploads are to occur within 10 days of the event.

Dates reported in ASSET need to have a purpose and should match the activities of the participant. For example:

Bus pass for August purchased on 7/24 would have a Transportation Assistance service with dates 8/1 – 8/31. The voucher or purchase order request must indicate that the bus pass is for the month of August.

Services in ASSET should be opened and closed in real time to reflect accurate dates of service provision.

Training services should be left open between attending consecutive terms:

- If the funding source is the same, and
- If the training program is the same.

Summer term does not count, meaning that attending spring, not attending summer, and attending fall terms would be considered consecutive.

## **SECTION 3 – CASE NOTES**

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Timely, accurate, comprehensive case notes are required to document a participant's experience and progress in the WIOA program. A new career planner or an external monitor should be able to follow case notes to understand the participants' needs, goals, and progress. Case notes should justify why services are being provided. Career Planners face several challenges in creating good case notes: sufficient information, but not too much; personal details, but protection of privacy; usable by a diverse audience, but not repetitious; and spending sufficient time on case notes but ensuring enough time for meaningful participant contact. Poor case notes may result in findings that will require additional time and explanation.

Case notes should include the context, setting, conditions, circumstances, and framework around which the interview/meeting was scheduled. This is not intended to repeat situations that have been outlined in previous case notes, but rather to introduce new situations or follow up on old situations that impact the participant's potential success. If nothing has changed for the participant, there is no requirement to put a background statement in the case note. However, Career Planners must always consider background at every meeting/contact.

It is important to explain the purpose, function, rationale, or intended usefulness of the contact/service. If you know "why" you met with your customer, be sure to tell the audience the reason for the meeting at the beginning of the case note.

Do not confuse "frequency" with "purpose." You might be meeting with the participant monthly, but "monthly meeting" is not the reason or purpose for getting together. Purpose should revolve around the planned goals and activities – are things getting done according to plan.

Career Planners should be observing, using all senses, the moment the participant arrives. Try to see the participant as a potential employer would; identify what could impact success in a training program, interview, or employment. Observations should focus on patterns, habits, and approaches that could impact goal attainment. Opinions should never appear in a case note. In other words, observations should be objective, not subjective. Example: "Customer had a bad attitude" (subjective opinion) vs. "Customer was ten minutes late" (objective observation).

Case notes, at the very least, should include a summary of key events in a participant contact. Case notes should include details of what was accomplished in the participant contact. If nothing was accomplished, state why.

Case notes should include how the contact and/or service relates to the IEP/ISS goals and objectives, including whether the participant is on track/ahead of schedule/behind schedule/ needs an entirely different plan to accomplish goals.

Case notes should explain the next steps, including “assignments” given to the participant, when the next meeting will occur, any documentation the participant will need to bring to the next meeting, and any other information regarding what will happen next as per the IEP/ISS. Doing so provides the necessary flow from one activity to another that effectively illustrates participant activity and services. Case notes should tell the story, from beginning to end, of each individual's engagement with the WIOA Program. Notes should be in complete sentences. Effective case notes are objective, detailed, accurate, and timely. DWD-DET defines the timely entry of case notes as occurring within 10 calendar days from the date of the interaction being documented. It is allowable to backdate a case note within 10 days so that the dates of the notes may coincide with other data. However, it is encouraged to minimize the time as much as possible between the event and its narrative in case notes.

Medical/disability related information must be marked as confidential, including referrals to DVR. See Chapter 5.7 in the DWD WIOA Policy Manual for details.

<https://dwd.wisconsin.gov/wioa/policy/05/05.7.htm>

When used to verify WIOA data elements, case note statements identify an individual's status for a specific data element, the date on which the information was obtained, and the career planner who obtained the information.

**NOTE:** The requirement to utilize case notes to document an individual's status for a specific data element applies only when case notes are an allowable documentation methodology for a particular data element and are being used as the sole method for documenting that element.

Case notes should also be used to document regular interactions with individuals including meetings, phone calls, emails, or other types of communication. The content and dates should agree with ASSET services.

Case notes must contain information about when a contact attempt was made, who initiated it, if it was answered, and the content of the conversation. All contact attempts must be documented.

Avoid using acronyms in case notes.

## **SECTION 4 – PARTICIPANT CONTACT POLICY**

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In WIOA, participant contact is needed for a variety of reasons:

- Providing services to the participant that provide value to the participant
- Gathering needed documentation as required by WIOA
- Cultivating a professional relationship with the participant to retain rapport
- Encouraging the participant toward the goals on their IEP/ISS
- Providing information to the participant to help them understand and meet their goals
- Receiving information from the participant to help understand the participant's goals and the steps they are taking reach for their goals.
- Receiving information from the participant to understand their barriers to their goals.

### Service vs Contact

Not all contacts or Career Planner activities are deemed WIOA services. Services are actions approved by WIOA which provide a benefit to the participant, which usually include contact with the participant. Contacting a participant to seek performance information for WIOA is necessary, but it is not a service to the participant. Contacting a participant to ask if they need anything is not a WIOA service, although

asking a customer about their needs is a necessary step toward service provision. Participation dates in WIOA are based on the provision of services to the participant.

When the participant states that they don't need anything, and no further services are planned, services must be closed.

Attempting contact with a participant once every 2 months is the absolute minimum expectation for active services. However, it is the service provision that will be actively monitored. If a case is being reviewed and service provision is suffering, contact methods and frequency will be looked at. Contact itself is not a service but is a *means* for delivering a service and is a necessary element of providing career services. Contact needs to be for the *purpose* of service provision.

There are times when a participant needs contact more frequently, and times when less is needed. Recommendations for frequency of contact is as follows:

- While in training, every 2 months
- While in career services, every 2 weeks
- While in a work experience or OJT, every week
- While in follow-up, quarterly
- During the first 2 months of enrollment in WIOA, every week, to build rapport.

While those contact frequencies are recommended, the career planner must try to exceed these timeframes to achieve success with the participant.

Career Planners may feel that they are working harder than their customers. This will most likely be the case, as Career Planners are the professionals with the tools and knowledge to help participants reach their goals, while participants are likely to *not* have those skills and knowledge; and Career Planners need to additionally document for compliance with WIOA. It is important to remember that we are serving people with barriers to employment and other life challenges. If adequate rapport is developed and maintained with participants, they are more likely to open up and share their success with their Career Planners.

Communication methods may vary from participant to participant, and from contact to contact. In-person contacts are the most efficient way to communicate, as it is more persuasive and motivating, and signatures are easily obtained.

Phone calls, texts, emails, letters sent via USPS, video conferencing, and possibly others are all suitable for connecting with participants. Take care to keep communications relevant to every customer whom the communication is directed. If not relevant, breakdown in communication and rapport may suffer. Email blasts, with a large variety of job openings, sent to an entire caseload doesn't take much effort, and participants and monitors alike see this as a marginal service. However, targeting one or two openings to one or two people who have matching career goals will mean much more. Emailing *targeted* job openings to participants does count as a Job Search Assistance service for WIOA, and should be documented in ASSET Services and Customer Notes.

The Career Planner and customer should discuss the preferred methods for contact. A customer may request to have less or more frequent contact; however, the case file must contain a signed attestation to the agreed-upon terms or have a statement by the Career Planner that tells the agreed-upon terms

and when and how the participant communicated it. Regardless, case notes in ASSET should reflect the request for less or more frequent contact.

### **LOSING CONTACT**

If a participant has not received a service or engaged in contact for two months, the Career Planner must ensure and document due diligence to attempt to engage the participant. This includes multiple and varied contact attempts. Before terminating all contact with a participant due to disengagement, complete all the following:

- Attempt all methods of contact documented on the Contact Standards form.
- Last attempt will be a letter by USPS Mail stating that the participant has a specific length of time to respond, or they will no longer be provided services from WIOA.
- Email the WDB Operations and Compliance Specialist the ASSET PIN of the individual and the intent to discontinue contact.

WDB staff will review the case directly in ASSET. When a decision has been made regarding the next steps, WDB staff will respond to all individuals copied on the email request.

## **SECTION 5 - ELIGIBILITY DETERMINATION**

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DWD-DET defines *eligibility determination* as applying the information collected during program registration to the eligibility criteria to see if the individual is eligible for the program. The documentation requirements can be found in DWD's File Documentation Policies at <https://dwd.wisconsin.gov/wioa/policy/12/>. In WDA 9, we use the [WIOA General Eligibility Documentation Form](#) to ensure that eligibility is fully documented.

The WDB expects all Career Planners to have a complete understanding of eligibility criteria and required supporting documentation. All supporting eligibility documentation must be received PRIOR to the Date of Participation (a.k.a., enrollment).

The Participation-Causing Services Guidance may be found at <https://dwd.wisconsin.gov/wioa/policy/08/08.3.1.101.htm> and shows which services will enroll an individual.

Participant files will be monitored for accurate and allowable eligibility determination, including necessary supporting documentation and the timeline the documentation was received. Any costs associated with participants who are found to be ineligible after enrollment will be disallowed and require reimbursement from the service provider to the WDB using non-federal funds.

Prior to enrollment, eligibility is to be determined using the WIOA General Eligibility Documentation Form. The form is to be fully completed. Additional assistance with eligibility determination can be found in the [DWD WIOA Policy and Procedure Manual](#). If assistance beyond this document is needed, please ask for technical assistance from WDB staff. Case notes are expected to adequately discuss the eligibility information. Case notes for dislocated workers from an Individual or Small Group Layoff may discuss receipt of unemployment documentation.

### **PRIORITY OF SERVICE**

"Priority of service" means the right to take precedence over a person with lower priority in obtaining employment and training services. The person with priority receives access to a service earlier in time than a person with lower priority or, if the resource is limited, receives access to the service instead of the person with lower priority. Priority is not part of the eligibility determination for any program; rather, it is meant to emphasize access to individualized career and training services for these higher-need populations. <https://dwd.wisconsin.gov/wioa/policy/08/08.3.2.htm>

Priority of service must be assessed at the time of eligibility determination, and participants must be informed if they are to receive priority. If, during participation, the career planner learns of changes in an individual's status that allow him/her to receive a higher priority of service, s/he must be given increased priority.

Once priority is assigned, a customer generally cannot move to a lower priority during an episode of participation. An exception to this rule, is that a spouse can lose his/her priority if a living veteran or service member loses the status that was the basis for the priority of service determination (e.g., a veteran with a total service-connected disability receives a revised disability rating at a lower level or the couple divorces). Remarriage of a widowed spouse does not cause any loss of eligibility.

Veterans and eligible spouses must receive priority of service in all US Department of Labor programs, including WIOA Youth, Adult, and Dislocated Worker.

Adult Program - For the Adult Program only, priority for individualized career and training services must also be given to participants who are designated low-income and/or basic skills deficient. Individuals who are English Language Learners meet the criteria for "basic skills deficient."

Priority of service must follow this order:

- 1) Veterans and eligible spouses who are low-income or basic skills deficient.
- 2) Individuals who are low-income or basic skills deficient but are not veterans or eligible spouses.
- 3) Veterans and eligible spouses who are not low-income or basic skills deficient.
- 4) Anyone who does not belong to one of the groups above, but who belongs to a priority population established by DWD-DET or the local WDB. Neither DWD-DET or WDA 9 have established any priority populations.
- 5) Everyone else.

Dislocated Worker Program – For the Dislocated Worker Program, priority is given to Veterans only. However, for federal reporting purposes, the Basic Skills Screening Tool must be completed to determine whether they are basic skills deficient, and the result is to be recorded in Manage Programs. Likewise, income and public assistance information is also completed and recorded for Dislocated Workers, but it does not affect priority of service.

Youth Program – For the Youth Program, priority is given to Veterans only. However, for eligibility and barrier identification purposes, the Basic Skills Screening Tool must be completed to determine whether they are basic skills deficient, and the result is to be recorded in Manage Programs. Likewise, income and public assistance information is also completed and recorded for Youth, but it affects eligibility, and not priority of service.

## **SECTION 6 – ASSESSMENT**

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The WDB allows a variety of assessments for each participant. Assessment is a systematic approach to gathering information about the customer's strengths and assets, needs and challenges, interests, and goals. This information, in turn, guides the development of the customer's employment plan and all other case management activities. **As such, assessment is considered the foundation of effective case management.** Career Planners must understand and use the various assessments available, be able to interpret the results of multiple assessments, and translate the information obtained through the assessment process into a plan of action. While the WDB expects to see consistent use of some assessments, it is also expected that choice of assessment will be tailored to each participant. For example, a TABE test would not be selected for a participant with a master's degree. Someone who has never had a job would be a candidate for a complete battery of assessments. All ASSET Documents will be monitored for evidence of appropriate, individualized assessments. ASSET screens and case notes will be monitored for completion and agreement with uploaded ASSET Documents. The link between (and use of) assessments to the development of the IEP/ISS will also be monitored. Case notes are expected to adequately summarize assessments.

### **YOUTH PROGRAM ASSESSMENTS**

Youth must receive an objective assessment for all the following areas prior to receiving program elements.

- academic levels;
- basic skills levels;
- occupational skills;
- prior work experience;
- employability;
- interests and aptitudes;
- areas of strength;
- developmental needs; and
- service needs, including supportive services.

There are limited instances where WIOA youth funds may be expended on costs related to individuals who are not yet participants in the WIOA youth program. Youth funds can be expended on outreach and recruitment or assessment for eligibility determination (such as assessing basic skills level) prior to eligibility determination, but they cannot be spent on youth program services, such as the 14 program elements, prior to eligibility determination.

The DWD policy on Youth Objective Assessment can be found at  
<https://dwd.wisconsin.gov/wioa/policy/10/10.2.3.htm>.

### **ADULT AND DISLOCATED WORKER ASSESSMENTS**

WIOA has different requirements between Adults/Dislocation Workers and Youth. Training and Employment Guidance Letter (TEGL) 19-16 acknowledges this difference. Assessment causes participation in WIOA Adult and Dislocated Worker, so must be provided after eligibility has been determined and documented.

Career Planners will select the appropriate assessment tool(s) for each participant using the following guidelines:

- Use a comprehensive and exploratory approach that involves both informal and formal assessments.
- Make assessment an ongoing process, allowing multiple opportunities to reassess progress and barriers.
- Use assessment tools that are known to produce valid and reliable results.
- Conduct a variety of tests to understand what is being assessed and for what purpose.
- Administer assessment instruments properly and under conditions that do not adversely affect performance.

Assessments will be documented in Documents, Assessments, Services, and Customer Notes in ASSET, as well as the employment plan in CEPT. Uploaded documentation should include the name of the participant and the date the assessment was taken.

## **SECTION 7 CAREER SERVICES**

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Career services are one of the three types of services offered by the Adult Program and Dislocated Worker Program. The purpose of career services is to support and empower customers in making informed decisions based on economic demand and in achieving their employment and education goals.  
<https://dwd.wisconsin.gov/wioa/policy/08/08.4.2.htm>

## **SECTION 8 – EMPLOYMENT PLAN DEVELOPMENT**

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The WDB expects Career Planners to help customers understand career choice, training options, and strategies for resolving barriers to self-sufficiency. Career planners will analyze the customer's skills, interests, and other assessment results, examine current labor market information, and work with the customer to develop an employment plan that includes immediate steps to obtain employment and long-term strategies to advance in the labor market. Specifically, after assessments are administered and interpreted, the Career Planner is expected to work in close collaboration with the customer to develop a comprehensive service strategy or action plan. Involving the customer is essential, since assessments can help customers come to new understanding of their interests and resources, which may affect how they would like to proceed with their employment plans. Once the Career Planner informs the customer of available activities, training programs, and other services, the two should work as partners to develop a mutually agreed-upon service strategy or employment plan.

The Employment Plan is also an agreement between the customer and Career Planner about how the customer will progress through benchmarks on the way to meeting his or her goals. The Employment Plan is expected to be tailored to the specific needs of the customer, referenced often, and updated regularly to track and reflect any changes. The Career Planner is expected to work with the customer to develop an employment plan that sets specific, measurable, obtainable goals and provides reasonable timeframes.

After consideration of all assessments, LMI, and other possible services, Career Planners should plan a meeting to develop the IEP/ISS with the participant. The Career Planner will use the IEP/ISS as a roadmap to help the customer obtain training and/or employment, so it is important that the participant is part of the discussion and has buy-in to the plan.

When preparing for the IEP/ISS appointment with the participant, it is also an excellent time to do a verify that all the information is correct and up to date in ASSET.

#### **Employment Plan/Service Strategy CHECKLIST (Example)**

- Review Communication Agreement, including contact information
- Release of information is current
- Review school status. If in school, should have school plan, schedules, FERPA, financial aid award, grades, MSGs/credential.
- Employment status. Manage Employment should contain all employment throughout enrollment.
- IEP Information: Goals, steps to achieve
- Progress since last time
- Barriers to progress
- Update steps to achieve goals
- Signature/acknowledgement
- Review ASSET and update all areas.

CEPT is used to complete the employment plan. See the Help link at the bottom of the CEPT website to find the CEPT Reference Manual and some videos for how to use CEPT to create the employment plan.

The Career Planner will use information gathered during the assessment process to understand the customer's current situation and how this affects his or her short- and long-term plans. Other elements to consider when developing an Employment Plan:

- Labor market information (LMI) should be used to guide the customer to make more forward-thinking decisions about his or her career path, considering not only his or her interests and goals, but also the current labor context. Career Planners can access LMI on WisEconomy, the WDB, or local DWD Economist.
- Co-enrollment – other programs should be considered, and referrals should be made to best meet the needs of each participant.

As a rule, employment plans must be updated every 6 months at a minimum. However, for practical purposes, updates will need to be made more often. The employment plan is the center of case management. All funding should be first discussed with the participant and put on the employment plan. Evidence of this joint planning are the employment plan updates that are acknowledged/signed by both Participant and Career Planner.

Every employment plan update that is acknowledged by both Participant and Career Planner will have a service screen that contains an Actual Open Date and Actual Closing Date that match the date that the participant acknowledged/signed the plan. There will also be a corresponding case note, including a summary of the discussion that took place during the employment plan discussion.

## **SECTION 9 – WORK EXPERIENCE POLICY AND PROCEDURE**

Adult and Dislocated Worker programs may also provide work experience opportunities, but there is no requirement to do so. Work experience is classified as a career service, and the emphasis for Adult and Dislocated Worker funding in Wisconsin is on training services.

E3 Works Youth Program - The guidance in this section of the WDB Case Management Policy focuses on the E3 Works WIOA Youth program.

Work experience is a paid/non-paid Workforce Innovation and Opportunity Act (WIOA) activity designed to enable participants to gain work maturity, occupational skills, and exposure to the working world.

**The work experience opportunity must be directly related to the participants' career goals as identified in the employment plan.** WIOA law requires that 20% of funding is spent on work experience for the Youth Program.

The work experience should help participants acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. The work experience provides participants with the opportunities for career exploration and skill development. Benefits include but are not limited to:

- exposure and exploration into different careers or industries,
- developing work readiness skills,
- motivation to stay in school and pursue a career or further training after completion of high school,
- develop a network of professional contacts, and
- develop a working relationship with a mentor.

Under WIOA, work experience becomes the most important of the program elements. WIOA Youth programs must use not less than 20 percent of the funds allocated to the local area to provide youth participants, both ISY and OSY, with paid and unpaid work experiences. WIOA does not discourage the use of OJTs for the WIOA Youth program, which are classified as a type of work experience in the Youth program.

Work Experiences are planned structured learning experiences that take place in a workplace for limited periods of time. Work experiences may take place in the private for-profit sector, the non-profit sector, or the public sector. Fair Labor Standards or applicable State law applies. Work experiences provide the youth participant with opportunities for career exploration and skill development. Work experiences must include occupational **and** academic education. Occupational education could include certifications earned in a pre-apprenticeship program; employability skills and employer expectations that would make a participant successful on the job; or specific skills or knowledge needed to perform daily duties and tasks of a specific career. Academic education may focus on learning about the occupational goal in general and may focus on the occupation outside the work experience worksite. The academic component will be noted in the Work Experience/Internship/Summer Employment Agreement and does not have to occur simultaneously with the work for the employer.

Youth Work Experiences may include:

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

Work experience must be based on identified needs of the individual youth and tied to the youth's individual career or employment goal. Use of work experience situations should be based on an objective assessment and service strategy identified in the youth's ISS.

The participant may enter more than one paid work experience activity prior to exit from the youth program. A participant's work experience schedule will be determined on an individual basis; however, the maximum number of hours any one participant can't exceed 40 hours a week. The exact duration will be set as appropriate for the participant's employment goals, background and skill level as reflected in the individual employment plan. Participants cannot take part in a work experience activity until the "Work Experience Agreement" has been approved and signed by all parties.

Wages paid will be at an hourly rate that is equivalent to trainees/employees who are similarly situated in similar occupations by the same employer and who have similar training, experience and skills, less \$1.00 per hour. For example, if trainees normally are paid \$14.00 per hour, then the wage for the participant in a work experience would be \$13.00 per hour. The wage rate will be reviewed on an annual or more frequent basis to adjust for labor market conditions.

Youth program service provider and participant mutually review and determine the feasibility of utilizing a work experience activity. The activity should focus on learning about their career goal.

The selection of a worksite for a paid and/or unpaid work experience is determined by the needs of the participant/employer. The employer agrees to provide work-related activities for the participant(s) to develop basic work habits, learn occupational skills, and gain usable "Work Experience" to promote future employment.

The employer agrees to maintain records and prepare reports on the participant as prescribed by the youth program service provider. The employer must observe and comply with applicable safety and health standards; observe Workers Compensation and Youth Labor Laws of Wisconsin and the Federal Government; adjust to other conditions as stated in the worksite agreement.

"Work Experience" activities will not reduce employer's current employees' work hours, displace current employees or create a lay-off of current employees, impair existing contract or collective bargaining agreements, and/or infringe upon the promotional opportunities of current employees.

When a youth program service provider identifies a potential worksite match between a participant and employer, the youth program service provider staff will review the work experience opportunity with the participant and evaluate the participant's interest. The WIOA Youth Career Planner authorizes all Work Experience. For the work experience, the youth provider will:

- Arrange worksite interview(s) with the employer
- Plan for an academic component
- Complete a Work Experience Agreement
- Submit, update and/or modify the ISS
- Ensure justification for the work experience is in ASSET (Documents, Program screens, Case Notes)
  - Does the work experience match the participant's interest?
  - Is the participant successfully accomplishing goals, meeting appointments, raising basic skill deficiencies, etc.?

- Why was the worksite chosen?
- How does the work experience relate to the youth's overall goals, occupational training, etc.?

**ASSET and File Documentation:** The youth program service provider will record all work experience activities into ASSET. ASSET Documents must contain the required work experience documentation.

- Work Experience Worksit Agreement. Worksit agreement must be signed before the participant starts work at the worksite.
- Paid Work experience Progress Report/Timesheet(s). May use employer timesheet if sufficient detail is outlined. Daily hour totals needed.
- For youth under the age of 18 years old, a minor wage agreement form must be completed; certifying receipt of completing a work permit (if applicable) and copy of such is uploaded to ASSET.
- The Supervisor Evaluation of Participant is to be completed by the Worksit Supervisor at the midpoint of the Work Experience to discover potential issues early enough to be corrected. In addition, the Supervisor Evaluation of Participant is to be completed by the Worksit Supervisor at the conclusion of the Work Experience

WIOA Youth Service Providers must track (and report monthly) funds spent on work experiences, including wages and staff costs for the development and management of work experiences.

## **SECTION 10 – WIOA YOUTH INCENTIVE POLICY AND PROCEDURE**

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WIOA funds may be used for incentive payments to in-school youth (ISY) and out-of-school youth (OSY) participants to recognize achievement of program milestones **directly tied to work experience, education, or training.** Program milestones may include but are not limited to:

- attaining a credential,
- graduating from secondary school or an equivalent program,
- completing a work experience,
- entering unsubsidized employment, and
- being accepted into a post-secondary school.

Incentives can be provided to youth during their participation in the WIOA Youth Program and the 12-month follow-up period after program exit.

**All incentives must be administered in a manner so that all participants receive equal rewards for equal achievements and that incentives are fully accessible/attainable by individuals with disabilities and LEP individuals.** In other words, if provider determines that participants will receive an incentive for completing a work experience, all participants who complete a work experience must receive the incentive. All incentives must be outlined in the ISS BEFORE the start of the program element for which the incentive is available. Incentives must be processed using a voucher or PO.

Service providers issuing incentives must have systems in place (internal controls) to safeguard cash and gift cards according to 2 CFR part 200. It is the responsibility of the service provider to read and understand 2 CFR part 200 and to ensure compliance. Documentation prescribed in the table below

MUST be present in the participant file or the incentive will be disallowed. The WDB will monitor for compliance.

Only the incentives authorized in this policy are allowed, exactly as prescribed. Incentive payments cannot exceed a lifetime amount of \$300 per participant. Any deviation from this policy may result in incentive expenditures being disallowed.

**Procedure:**

- When incentives are appropriate, identify the incentive from the list/table contained in this document. Identify the work experience, education or training that s/he plans to undertake and the corresponding incentive award(s) to be provided in the ISS.
- Enter the incentive in Manage Services in ASSET. Incentives are their own service, not a support service.
- Case note the opening of the services and plan for incentive.
- Follow the progress toward the identified incentive. Case note progress and/or lack thereof.
- Upon completion of the incentivized activity, the participant's file must include documentation of the achievement of each milestone for which s/he received an incentive, as indicated on the list/table in this document. Case note completion and documentation received.
- Upload a copy of the voucher/purchase order to ASSET.

| Type of Milestone                   | Notes on Conditions when Allowable | Associated Service(s)   | Example Documentation                             | Amount |
|-------------------------------------|------------------------------------|---|---|--------|
| 1. Attain High School Diploma       | Allowable                          | <ul style="list-style-type: none"><li>• Non WIOA Funded Secondary Education</li><li>• Tutoring, Study Skills Training, Dropout Prevention</li></ul>   | Copy of diploma or transcript showing graduation  | \$50   |
| 2. Attain GED/HSED                  | Allowable                          | <ul style="list-style-type: none"><li>• Alternative Secondary School or Dropout Recovery Services</li><li>• Non WIOA Funded Secondary Education</li><li>• Tutoring, Study Skills Training, Dropout Prevention</li><li>• Adult Basic Education</li></ul> | Copy of GED/HSED or transcript showing graduation | \$50   |
| 3. Pass a Component of the GED Test | Allowable                          | <ul style="list-style-type: none"><li>• Alternative Secondary School or Dropout Recovery Services</li><li>• Non WIOA Funded Secondary Education</li><li>• Adult Basic Education</li><li>• Tutoring, Study Skills Training, Dropout Prevention</li></ul> | Copy of official document showing passing score   | \$25   |
| 4. Achieve Post-Secondary           | Allowable                          | <ul style="list-style-type: none"><li>• Occupational Skill Training</li><li>• Education Offered Concurrently with</li></ul>   | Copy of diploma/certificate or transcript         | \$100  |

| Type of Milestone   | Notes on Conditions when Allowable  | Associated Service(s)  | Example Documentation  | Amount |
|---|---|--|--|--------|
| Certificate or Degree   |   | Workforce Preparation Activities<br><ul style="list-style-type: none"> <li>Non WIOA Funded Post-Secondary Education</li> <li>Apprenticeship</li> </ul>                                   |  |        |
| 5. Application to Post-Secondary School. ISS must include post-secondary attendance as necessary to reach career goal | Allowable. Post-secondary training or education does not have to be started or completed but must be planned.                 | <ul style="list-style-type: none"> <li>Activities Helping Youth Transition to Post-Secondary Education and Training</li> </ul>   | Copy of letter confirming application or confirming acceptance/denial of admission | \$15   |
| 6. Completion of FAFSA<br>ISS must include post-secondary attendance as necessary to reach career goal                | Allowable if post-secondary education or training is planned; education or training does not have to be started or completed. | <ul style="list-style-type: none"> <li>Activities Helping Youth Transition to Post-Secondary Education and Training</li> </ul>   | Copy of notification of receipt or submission                                      | \$15   |
| 7. Enrollment in Post-Secondary School. ISS must include post-secondary attendance as necessary to reach career goal  | Allowable. Post-secondary training or education does not have to be started or completed but must be planned.                 | <ul style="list-style-type: none"> <li>Activities Helping Youth Transition to Post-Secondary Education and Training</li> </ul>   | Copy of course schedule  | \$25   |
| 8. Post-Secondary Semester Completion of at least 10 credits with a minimum 2.0 GPA                                   | Allowable   | <ul style="list-style-type: none"> <li>Occupational Skill Training</li> <li>Education Offered Concurrently with Workforce Preparation Activities</li> </ul>                              | Copy of transcript   | \$50   |
| 9. Completing a Résumé  | Allowable   | <ul style="list-style-type: none"> <li>Work Experience: Internship</li> <li>Work Experience: School Year Employment</li> <li>Work Experience: Summer Employment Opportunities</li> </ul> | Copy of completed résumé or ASSET WIOA Title III proof of completion               | \$15   |
| 10. Completing an Informational Interview   | Allowable   | <ul style="list-style-type: none"> <li>Career Awareness, Exploration, and Counseling</li> </ul>  | Copy of documentation from employer or company confirming interview completion     | \$15   |

| Type of Milestone  | Notes on Conditions when Allowable  | Associated Service(s)  | Example Documentation  | Amount |
|--|---|--|--|--------|
| 11. Completing Job Shadow  | Allowable   | <ul style="list-style-type: none"> <li>Work Experience: Job Shadowing</li> </ul>   | Copy of letter on company letterhead regarding the participant's completion of a job shadow activity.  | \$15   |
| 12. Completing an aptitude and/or career interest assessment   | Allowable   | <ul style="list-style-type: none"> <li>Career Awareness, Exploration, and Counseling</li> </ul>  | Copy of completed assessment   | \$15   |
| 13. Obtaining Unsubsidized Employment – successful completion of a work experience as outlined in the worksite agreement, with no unexcused absences                 | Allowable   | <ul style="list-style-type: none"> <li>Work Experience: Internship</li> <li>Work Experience: School Year Employment</li> <li>Work Experience: Summer Employment Opportunities</li> </ul> | Pay stub(s) or letter of hire  | \$100  |
| 14. Entrepreneurial Training or Planning<br>Only allowable if business ownership is career goal identified in ISS (WDB approval required prior to issuing incentive) | Allowable if business ownership is a goal identified on the participant's ISS                                   | <ul style="list-style-type: none"> <li>Entrepreneurial Skills Training</li> </ul>  | Completed business plan or similar achievement produced during entrepreneurial training.   | \$15   |
| 15. Apprenticeship Achievements<br>Completion of a registered pre-apprenticeship program (WDB approval required prior to issuing incentive)<br>OR                    | Allowable for attaining an apprenticeship, or milestones such as completing a year or the entire apprenticeship | <ul style="list-style-type: none"> <li>Work Experience: Pre-apprenticeship Programs</li> <li>Apprenticeship</li> </ul>   | Copy of journeyman card or other official documentation showing achievement of registered apprenticeship milestones; for Youth Apprenticeship participants, proof of registration as a | \$100  |

| Type of Milestone  | Notes on Conditions when Allowable | Associated Service(s) | Example Documentation   | Amount |
|--|------------------------------------|-----------------------|---|--------|
| Completion of the first year of a registered apprenticeship (WDB approval required prior to issuing incentive) |                                    |                       | Youth Apprentice or the Youth Apprenticeship completion certificate (Certificate of Occupational Proficiency) |        |

WIOA funds **cannot** be used for incentives to motivate activities that are not directly tied to work experience, education, or training-related program milestones. Prohibited activities include those related to recruitment, submitting eligibility documentation, and participating in the program. Specific examples of activities for which local WDBs cannot use WIOA funds to provide incentive payments include:

- Enrolling in WIOA Youth Program services
- Referring a friend to the WIOA Youth Program
- Providing documentation/information for program eligibility
- Attending career counseling sessions or career awareness activities
- Choosing a career pathway
- Communicating/keeping in touch with Youth Program staff
- Participating in services
- Researching Labor Market Information (LMI) data
- Completing financial literacy education activities, including completion of a budget
- Completing a wellness plan
- Completing driver's education for a regular (non-commercial) driver's license or earning a regular (non-commercial) driver's license

It is allowable to leverage non-WIOA funds for incentives that WIOA cannot fund.

## **SECTION 11 – TRAINING & ELIGIBLE TRAINING PROVIDER LIST (ETPL) POLICY**

Individual Training Accounts (ITAs) are the primary method to be used for funding training services for Adult Program and Dislocated Worker Program participants.

Adult and Dislocated Worker program participants must meet all five of the following criteria to be eligible for training.

1. Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone;
2. Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment;

3. Has the skills or qualifications to successfully participate in the selected program of training services;
4. Is unable to obtain grant assistance from other sources (e.g., state-funded training funds, Trade Adjustment Assistance (TAA), and/or federal Pell Grants) to cover the full costs of such training;

AND

5. Will be entering a program of training services that is:

- a. directly linked to employment opportunities in an in-demand industry and occupation as identified in either the local or regional plan for the local area or planning region serving the individual, or the local or regional plan for another local area or planning region to which the individual is willing to commute or relocate;

OR

- b. directly linked to a specific employment opportunity or opportunities in either the local area or planning region where the individual resides, or another local area or planning region to which the individual is willing to commute or relocate.

An ITA must be used to fund the training, unless the training is funded through a contract for services under one of the five "contract exceptions" as described in TEGL 19-16, section 8.

Youth program participants interested in training who are age 18 and over are encouraged to be evaluated by the Adult services provider for enrollment in WIOA Adult, to maximize the 35% training criteria for Adult/DW, and to also maximize for the 20% work experience criteria for Youth. <https://dwd.wisconsin.gov/wioa/policy/07/07.1.htm>

#### **SELECTION OF CLIENTS FOR TRAINING**

Determination of the Need for Training must be documented in case notes prior to the beginning of training. Reasons of need may include:

- Participant has an *interest* in and knowledge of the industry in which training is requested (i.e., can deal with body fluids for health care, understands and is able to perform physical demands of the occupation).
- Participant does not have the *skills* needed to enter the demand occupation or industry using assessment or documented job search efforts.
- Participant lacks *credentials* needed to advance within a company, or has a foreign license that isn't accepted in the United States.
- Participant will remain in the area or re-locate to an *area* where the occupation/industry is in demand.
- Participant does not, but will after successfully completing training, meet the standards for *economic self-sufficiency*.
- Participant is unlikely or unable, by only receiving career services, to obtain or retain employment that *leads* to economic self-sufficiency.

The Individual Employment Plan (IEP) for Adult and DW or Individual Service Strategy (ISS) for Youth must indicate training-related needs, supported by assessment information. The IEP/ISS must also identify barriers to training and employment and specify plans to overcome barriers.

If enrolled in a Pell-eligible program, the participant must apply for financial aid. Note that someone may be eligible for a Pell Grant while taking just 3 credits, or other types of financial aid while taking 6 credits.

WIOA-eligible clients who have defaulted on a general student loan or are ineligible for Pell Grants are still appropriate to serve. Although the lending institution may have instituted collection proceedings, these clients are not on a government-wide debarment list. However, the individual may not be allowed to enroll in courses until their account is current. It is the responsibility of the service provider to ensure the training candidate is enrollment eligible PRIOR to paying training support or tuition. The service provider should assure that clients are fully assessed and provided the full range of services necessary to complete their programs and to achieve goals on IEP/ISS.

#### **SELECTION OF TRAINING PROGRAMS**

Training provided by WIOA funds shall only be for occupations in industries for which there is a local demand in the service area or another area to which the client is willing to relocate. For clients served within WDA 9, training will focus on occupations in the targeted industry sectors as outlined in the WIOA plan. However, it is acceptable to train in any sector that matches the individual's needs, if labor market information documents that the training will put the participant on the path to self-sufficiency. The labor market information should be saved in ASSET Documents.

All training should be designed to prepare students for gainful employment in a recognized occupation or profession. Emphasis will be placed on training individuals for non-traditional demand occupations. Categories of training include:

| <b>Service Name</b>  | <b>Service Description</b>   |
|--|--|
| <u><b>Adult Education and Literacy</b></u>                                 | Engaged in an adult basic educational or literacy program. Allowable ONLY IF in conjunction with occupational classroom, OJT, incumbent worker training, programs that combine workplace training with related instruction, or entrepreneurial training. ITA eligible. |
| <u><b>Apprenticeship Training</b></u>                                      | Engaged in a registered apprenticeship program. The classroom portion of any registered apprenticeship program on the ETPL is ITA eligible. An OJT contract may be used to fund the on-the-job training portion of any registered apprenticeship program.              |
| <u><b>Combined Workplace Skills Training &amp; Related Instruction</b></u> | A structured training program that combines classroom instruction and work experience (includes pre-apprenticeship and cooperative education programs.) ITA eligible.  |
| <u><b>Customized Training</b></u>  | Engaged in training customized for a specific employer/individual, for which the employer pays a significant portion of the cost of training. Not ITA eligible.  |
| <u><b>English Language Instruction</b></u>                                 | Engaged in instruction in the English language. ITA eligible IF provided in conjunction with Occupational Classroom, OJT, Incumbent Worker Training, Combined Workplace Training &   |

|  |   |
|--|---|
|  | Related Instruction, Skill Upgrading and Retraining, or Entrepreneurial Training.   |
| <b><u>Entrepreneurial Training</u></b> | Engaged in training providing the basic skills needed to start and operate a small business. ITA eligible.  |
| <b><u>Job Readiness Training</u></b>   | In training designed to improve skills in seeking and retaining employment. ITA eligible when provided in conjunction with occupational classroom, OJT, incumbent worker training, programs that combine workplace training with related instruction, entrepreneurial training, or transitional jobs. |
| <b><u>Occupational Classroom</u></b>   | Engaged in an organized program of study consisting of one or more courses or classes, which when successfully completed leads to one or more of: a recognized postsecondary credential, employment, measurable skills gains towards a recognized credential. ITA eligible.                           |
| <b><u>On-The-Job Training</u></b>      | Limited-term, onsite training provided to a participant by their employer under contract with the WDB. The participant's wages are subsidized by the program. Not ITA eligible.   |

#### **SELECTION OF TRAINING PROVIDERS**

For degree or credentialed training, the program must be listed on Wisconsin's Eligible Training Programs List (ETPL), found at <https://dwd.wisconsin.gov/ETPL/home/programsearch>.

#### **DETERMINING FUNDING LEVEL**

The WDB requires that all Adult and Dislocated Worker participants enrolled in any Pell-eligible training program must apply for financial aid. Pell Grants may be available with just 3 credits. The Pell-eligible institutions are required to provide the WIOA service provider with a copy of the Student Award Letter and other documents pertinent to determination of financial aid available from non-WIOA funding sources. Clients will also be referred to link with other appropriate service delivery organizations.

Pell considers total expenses as allowable. WIOA funding may contribute towards tuition, fees, books, and other materials necessary for the educational program, as well as other support costs necessary to complete training in accordance with WIOA Support Services Policy.

Actual funding level will be determined in the following manner:

1. The participant is required to apply for financial aid.
2. Clients may be responsible for some portion of their training costs, which includes training costs and living expenses.
3. Participants will be encouraged to complete training in the shortest time possible.
4. Funding will not exceed \$16,000. Eligibility for loans may be considered; however, clients cannot be required to apply for loans.
5. Waivers to exceed \$16,000 for a participant will be considered on an individual basis with the amounts determined based on the needs of the individual, as documented in the IEP/ISS, and needed for success in the program. Service Provider must gain written approval of the WDB Director or designee before the expense is incurred.

Outcomes: All grade reports and training completions should be evaluated for MSGs and Credentials and results entered in ASSET within 10 days of receipt of documentation.

## **SECTION 12 – ON-THE-JOB TRAINING**

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On-the-Job Training (OJT) is training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- provides knowledge or skills essential to the full and adequate performance of the job;
- is made available through WIOA that provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, for the extraordinary costs of providing the training and additional supervision related to the training; and
- is limited in duration as appropriate to the occupation for which the participant is being trained, considering the content of the training, the prior work experience of the participant, and the service strategy of the participant, as appropriate.

The amount of time needed for the OJT depends on several factors regarding each trainee:

- 1) Prior work experience and education;
- 2) Skills, knowledge, and abilities; and
- 3) Any barriers that would affect the length of the training time.

The training time cannot include those types of training normally provided by the employer for new employees such as orientation to the job/business, safety procedures, etc.

The length of training is then determined by assessing and documenting the above factors for each trainee and by determining the usual time that is needed to train for the occupation or job. Training plans should not be done for less than 6 weeks or more than 6 months.

The trainee assessment is completed through the individual employment plan process and the length of job training is determined by the Specific Vocational Preparation (SVP) after an analysis of the tasks involved in the OJT job. The SVP is the amount of lapsed time required by a typical worker to learn the techniques, acquire the information, and develop the facility needed for average performance in a specific job-worker situation.

- 1) The job title should be specified by the employer.
- 2) The case manager then enters this into the O\*Net system (<http://online.onetcenter.org>) to determine the SVP of the job. Entering the job title in the search box may bring up an array of job titles from which to choose the most applicable.
- 3) The job tasks can then be determined by reviewing the employer's job description and/or the job tasks listed on the O\*Net summary report for the occupation.
- 4) Along with the employer, the case manager should pick out the 5 to 7 most important job tasks for which the trainee needs to be trained and identify any reasonable accommodations(s) as appropriate for the individual.
- 5) The trainee's assessment is then used to determine the skill level of each task and the length of the training plan.

The training time and reimbursement rate must be negotiated with each employer on an individual basis, depending upon the employer needs and the training requirements of the trainee. In all cases, the case notes/case file for the participant should indicate the basis for determining the number of hours of training included in the OJT contract.

**Example:** The employer job title is bookkeeper, but the job duties involve mostly payroll and timekeeping.

- 1) Enter bookkeeper in the O\*Net search box and then pick Payroll & Timekeeping Clerk from the job titles and go to the Payroll & Timekeeping Clerk summary report.
- 2) This page shows the O\*Net Code, 43-3051.00, which could be entered on the Training Plan form. The Job Zone section (lower on the same page) shows the SVP code for this occupation is 4.0 to 6.0.

#### **Job Zone**

**Title** Job Zone Two: Some Preparation Needed

**Education** These occupations usually require a high school diploma.

**Related Experience** Some previous work-related skill, knowledge, or experience is usually needed. For example, a teller would benefit from experience working directly with the public.

**Job Training** Employees in these occupations need anywhere from a few months to one year of working with experienced employees. A recognized apprenticeship program may be associated with these occupations.

**Job Zone Examples** These occupations often involve using your knowledge and skills to help others. Examples include sheet metal workers, forest fire fighters, customer service representatives, physical therapist aides, salespersons (retail), and tellers.

**SVP Range** (4.0 to < 6.0)

- 3) The SVP hours can then be determined from the chart below. Since overall SVP for a Payroll & Timekeeping Clerk is above the maximum allowed ("5" which translates to 26 weeks), the maximum training plan period for this position is limited to 26 weeks.
- 4) For a thorough discussion of the SVP system: <http://www.onetonline.org/help/online/svp>

**The Maximum hours for training according to the SVP Code are:**

**SVP MAXIMUM HOURS CHART**

| <b>SVP</b> | <b>Maximum Hours</b> | <b>Minimum Weeks</b> |
|------------|----------------------|----------------------|
| <b>1</b>   | 0                    | 0                    |
| <b>2</b>   | 240                  | 6                    |
| <b>3</b>   | 520                  | 13                   |
| <b>4</b>   | 800                  | 20                   |
| <b>5+</b>  | 1,040                | 26                   |

**NOTES:** The training hours noted on the scale above give the maximum allowable hours for a given SVP.

The actual training time may be determined based on the variables of the job, the actual demands of the job stated in the job description and the training plan, and the previous education training, skills, and/or experience of the trainee.

The training hours may also be adjusted for reasonable accommodation for persons with disabilities or other individual needs which may affect the number of hours the trainee needs to acquire the skill(s).

The SVPs above represent the average amount of time required to learn the techniques, acquire information, and develop the facility needed for average performance in a specific job-customer situation.

Training hours should generally not exceed the SVP hours unless special needs are documented; however, in no case may they exceed 1040 hours (6 months).

OJTs must be monitored by career planners to assess for measurable skills gains.

## **SECTION 13 – SUPPORT SERVICES**

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WIOA defines supportive services as those services necessary to enable an individual to participate in activities authorized under WIOA Title 1. Supportive services may include transportation, child care, dependent care, emergency assistance, referrals to medical services and assistance with work attire and work-related tool costs.

Assistive technology/equipment may be included in this definition if staff document that the participant needs this technology/equipment to participate in the WIOA activity. The extent of supportive services provided will vary based on the participant's needs and the area's availability of funds and resources. **In addition to this local policy, the WDB expects service providers to be knowledgeable of and compliant with relevant sections of the DWD WIOA Policy and Procedure Manual, specifically Section 8.6.3 and 8.6.4.**

The Western Wisconsin Workforce Development Board, in consultation with the One-Stop partners and other community service providers, have agreed that support services may also include such things as *referrals* to health care, drug and alcohol abuse counseling and referral, individual and family counseling, special services and materials for individuals with disabilities, child care and dependent care, meals, temporary shelter, financial counseling, and any other service that may help overcome a specific barrier to employment or that is required for a WIOA program. Services are to be provided in-kind. AODA referrals must use free resources (e.g. Coulee Council on Addictions (608) 784-4177  
<http://www.couleecouncil.org/>, or Driftless Recovery Services (608) 519-5906  
<https://www.driftlessrecovery.com/>, unless otherwise approved by the WDB.

Career Planners must become familiar with resources in the community so that customers are able to address all their barriers to employment. There are a variety of places to get information on different resources:

- There is a Community Resources Search widget available in the Comprehensive Employment Planning Toolkit (CEPT) system. You can search for a community resource that is unique to a certain customer and save the information, which is accessible to the participant via their Job Center of Wisconsin (JCW) account.
- The Workforce Connections website has resource guides that were produced by the W-2 Children's Services Network. These guides can be accessed at <https://www.workforceconnections.org/resources.html>.
- The Greater La Crosse Area Diversity Council has a resource directory at <https://www.glauxdiversitycouncil.com/multicultural-resource-guide/>.

The use of WIOA funds for the following supportive services is prohibited:

- Business Capitalization- WIOA funds cannot be used to capitalize a business. For example, the purchasing of tools as a post-employment or follow-up service for a participant who is or will become self-employed.
- Deposits- WIOA funds cannot be used to pay or reimburse for any type of deposits, e.g., rental, lease, etc.
- Medical procedures to treat a health condition, or transportation to medical appointments. Exception: Physical examinations/tests routinely required to assess the individual for program activities are allowable.
- Reimbursement to the participant for expenses incurred without prior approval.

The need for each supportive service must be clearly documented in participant case files and based on an assessment of the Individual's needs. The Individual Employment Plan (IEP) for Adult/Dislocated Worker or Individual Service Strategy (ISS) for Youth must clearly document the need for the supportive services and the length of time the service is anticipated.

Support services are not to be opened as a stand-alone service but must be added as a complement to an actual participant activity-related service.

Individuals need to understand that support services are intended to be provided when funding is available and not as an ongoing service. In some cases, an individual may need alternate funds to cover any remaining costs.

WIOA funds are only available to support the individual enrolled in the program; therefore, bills/invoices:

- must be in their name, OR
- in rare exceptions, in the name of another (spouse, relative, roommate, significant other, etc.), where the following information is provided:
  - Name
  - At least 2 methods of contact information
  - Relationship to the participant
  - Rationale for using this other individual

Failure to have the proper documentation in case files may lead to disallowance of expenditures. The provision of WIOA supportive services is recorded in ASSET under Manage Services.

Supportive services funded by other sources may be reported in ASSET. Services should be opened and closed as they occur, with a new service screen opened for each service rendered.

Good judgment will apply in the selection of a provider. The provider should have a competitive price compared to other providers and shall be from the local area whenever possible. This will allow for direct contact, ease in obtaining the service, and the expenditure of funds within service area boundaries. Reputation, quality, cost, and individual choice will be considered in the selection of providers.

#### **ADULT AND DISLOCATED WORKER**

TEGL 19-16 states that "Supportive services may be made available to any adult or dislocated worker participating in title I career services or training activities that is unable to obtain supportive services through other programs providing such services."

Prior to providing supportive services, program eligibility must be documented, verified, and in case comments.

Support services provide participants with the resources they need to overcome barriers to successful participation in career and training services. Support services assistance is provided only to participants who:

- Are or will be engaged in Career or Training services;
- Are unable to obtain supportive services themselves or via their support network;

- Are unable to obtain supportive services through other programs including community agencies that provide these services;
- Demonstrate a need for assistance to enable him/her to participate in Title 1 activities; and
- Have an IEP that outlines the need for supportive services that are tied to career goals and activities.

For each Adult/Dislocated Worker participant receiving supportive services, the career planner must:

1. Document all supportive service needs (information/referral and program-funded) in the participant's IEP and indicate how the needs will be addressed.
2. Document all supportive services that the participant receives in ASSET case notes.
3. Document in an ASSET case note if the career planner offers a supportive service, but the participant declines it.

Program-funded supportive services through the Adult and Dislocated Worker Programs may be provided when:

- participants are or will be engaged in career or training services;
- they need the supportive services to participate in career or training services;  
AND
- it can be demonstrated that they cannot access the supportive services, within the time frame needed, through other WIOA titles, federal or state public assistance programs, or job center partners in the local WDA.

Example: A participant needs help with transportation to a class starting next week. A community organization provides funding for transportation but will not have funds available for this purpose until next semester. Since the service is not available by next week, which is the time frame needed, WIOA can fund supportive services for transportation for this participant.

If the individual is eligible for TAA services, the case files will need to have documentation that the supportive service is not available, and the individual is enrolled in a TAA certified training program.

Documentation of non-availability must contain:

- Name of organization contacted
- Date of contact and contact name
- Notes on availability of funding or non-eligibility
- In cases where an agency typically has funding available but has reached funding limitations a copy of a letter or email from the agency stating such is acceptable documentation.

Every support service administered under WIOA must be adequately documented to ensure the service is allowable, reasonable, justified and not otherwise available to the individual. All support services must be clearly documented in the case files and ASSET case notes, service screen, and IEP. The file must include all documentation that substantiates the need for the support service(s). Financial documentation must include itemized receipts, copies of vouchers/PO, etc. Each file must also include evidence of participation in the activity related to the support service(s). For example, if an individual receives mileage reimbursement, a gas voucher, or bus pass he/she must provide a log of mileage and evidence of the employment related activity in which he/she participated.

Adult and Dislocated Worker providers should utilize one or more resource directories (Directory 211, W-2 Program) to make referrals prior to paying for supportive services. Examples of possible community resources include:

- Faith-based organizations

- Non-profit organizations
- Women's shelters
- Clothes closet
- Food Pantry
- FoodShare Program
- Pro bono medical, dental, and legal services (may or may not need to be accessed through an organization)
- Government assistance such as: local health departments; the Women, Infants and Children (WIC) program; assistive technology reimbursement programs; BadgerCare, etc.
- Local transportation programs
- State and national organizations such as: United Way, Goodwill, Salvation Army, etc.

Since WIOA program funding is not an entitlement, supportive service payments are made on a case-by-case basis only when determined necessary and reasonable. The supportive services must be necessary for the customer to achieve the goals outlined in the employment plan. Therefore, it is imperative that the goals listed on the employment plan are consistent with what the customer intends to achieve. Costs of supportive services must demonstrate a direct connection to participation in employment activities or education and training programs which will eventually lead to unsubsidized employment and assist in building skills needed to succeed and advance in the workplace. Payments should not be made for non-WIOA activities or for items that are not necessary for participation in the WIOA activity.

### **YOUTH PROGRAM**

Support services provide Youth Program participants with the resources they need to overcome barriers to successful participation in WIOA services. Support services assistance is provided to participants who:

- Are or will be participating in Youth Program Elements or Follow-up Services;
- Demonstrate a need for assistance to enable him/her to participate in Title 1 activities; and
- Have an ISS that outlines the need for supportive services that are tied to career goals and activities.

Every support service administered under WIOA must be adequately documented to ensure the service is allowable, reasonable, and justified. All support services must be clearly documented in the case files and ASSET case notes/service screen/ISS. The file must include all documentation that substantiates the need for the support service(s). Financial documentation must include itemized receipts, copies of vouchers/PO, etc. Each file must also include evidence of participation in the activity related to the support service(s). For example, if an individual receives mileage reimbursement, a gas voucher, or bus pass he/she must provide a log of mileage and evidence of the employment related activity in which he/she participated.

WIOA Youth Provider should utilize one or more resource directories (Directory 211, W-2 Program) in order to make referrals to meet needs that cannot be paid with WIOA funding. Examples of possible community resources include:

- Faith-based organizations
- Non-profit organizations
- Women's shelters
- Clothes closet
- Food Pantry
- FoodShare Program

- Pro bono medical, dental, and legal services (may or may not need to be accessed through an organization)
- Government assistance such as: local health departments; the Women, Infants and Children (WIC) program; assistive technology reimbursement programs; BadgerCare, etc.
- Local transportation programs
- State and national organizations such as: United Way, Goodwill, Salvation Army, etc.

Since WIOA funding is not an entitlement, supportive service payments are made on a case-by-case basis only when determined necessary and reasonable. The supportive services must be necessary for the customer to achieve the goals outlined in the individual service strategy. Therefore, it is imperative that the goals listed on the individual service strategy are consistent with what the customer intends to achieve. Costs of supportive services must demonstrate a direct connection to participation in employment activities or education and training programs which will eventually lead to unsubsidized employment or continuing education and assist in building skills needed to succeed and advance in the workplace. Payments should not be made for non-WIOA activities or for items that are not necessary for participation in the WIOA activity.

#### **FUNDING LEVELS (Adult/Dislocated Worker and Youth)**

**Maximum Lifetime Limit** – The maximum lifetime limit for Supportive Services for an individual enrolled in WIOA Title 1 Services is **\$5,000**. This is not an entitlement.

**Note:** Training tuition and training paid through a contract are separate pots of money and are not included in the \$5,000 maximum. Training has its own maximum of \$16,000 lifetime. However, educational expenses such as books, fees, certifications, licensing, tools, and admission fees related to training are supports subject to the \$5,000 maximum.

**Clothing/Uniforms** – Up to **\$500** per individual lifetime limit. Any clothing or uniform support should be limited to what is required for the individual for training, work-experience, interviewing or employment.

#### **Dependent Care –**

- Current market rates per hour to enable job search or training activities for the first dependent and **80% of the current market rate** for each additional dependent. The Childcare Resource and Referral agency in La Crosse, which can be assessed at <https://www.theparentingplace.net/parents/resources/choosing-child-care/average-child-care-rates> will be the source for the current market rates. Case files should include a printout of the website, showing the rate used, and that it pertains to the same criteria as the participant. If information is not available on the website, please contact the WDB for a rate sheet.
- The case files need to contain documentation that the individual was participating actively in job search or attending training (including on-line training).
- Family members living in the home are not eligible to receive dependent care reimbursement.

**Educational Expenses** - Allowable expenses are college application fees, background checks, GED/HSED testing, ACT testing, books, supplies, certification exams, etc.

**Emergency Payment** - Should an individual be at risk of losing housing or utility disconnection, emergency payments may be made. There must be a documented financial crisis such as: illness or injury; involuntary loss of employment; divorce/separation; or large medical expenses not covered by

insurance. Must coordinate with Emergency Assistance, Red Cross, Catholic Charities, Community Assistance Programs (i.e., Couleecap) or any other agencies that offer housing assistance or homelessness prevention. Only for unmet need. The case file must contain documentation of the eviction or disconnection notice. One-time payments may be made to the landlord or utility company and should not exceed what is required to bring the individual current. The individual is limited to two Emergency payments during participation in the program. The Individual Employment Plan must contain a plan on how the participant will avoid ending up in a similar situation. Lifetime funding is limited to \$2,000; \$1000 per incident, 1 incident per year.

**Lodging** – Up to **50%** of lodging required during an out-of-area job search is reimbursable up to the current per diem rate for the area of lodging as defined by the federal government. Per diem rates may be found at <https://www.gsa.gov/>. Individuals must request lodging support assistance before the expense is incurred. Out-of-area is defined to be over 3 hours of travel time.

**Phones** – Up to **\$600 lifetime / \$30 per month** in minutes with no limit until \$600 total in phone expenses is reached. If a phone needs to be purchased, the least expensive phone plan available must be used. The participant must log all calls and account for minutes used for job search, education, or employment. Minutes used for other purposes must be reimbursed by the individual.

**Physical Examinations** – Up to **\$300** per individual lifetime limit. Support must be directly related to employment or education and not covered by other insurance (including BadgerCare and ACA) or employers. Examples include physicals, TB tests, and eyeglasses/exams. Physical examinations will be provided and will be limited to what is required to assess the individual for program activities.

**Relocation** - Relocation Assistance is classified as an Individualized Career Service and must be documented in ASSET with the Out of Area Relocation Assistance service. The maximum amount allowed per individual for relocation assistance shall be **\$1,500** including all relocation expenses (commercial carriers and/or moving van, transportation, meals, motel, storage of household goods up to 60 days, etc.). Relocation assistance may be provided to individuals to assist in moving outside the regular commuting area to accept a bona fide offer of employment. Assistance may include costs to cover expenses incurred during the move and immediate costs upon arrival in the new area (i.e., utility hook-up, rent down-payment, temporary lodging, and meals). Moving costs may include mileage to the new area, rental costs of truck/trailer for moving personal belongings, meals and lodging while in transit, and temporary storage costs. The amount paid for relocation assistance will be approved on an individual basis and will be based on need and available funds.

All requests for relocation assistance must be approved by the service provider before the relocation begins. Only one relocation allowance may be paid per individual. The relocation must begin within 6 months of the date of application or after completing approved training. Individuals receiving relocation assistance must be able to provide documentation of the following criteria:

- Offer of suitable employment with start date and wage. (Defined as employment which allows for self-sufficiency (or requires waiver) full-time employment or obtained a bona fide job offer from an employer outside the regular commuting area);
- Documentation that the relocation is not paid for by the employer or a source other than the claimant; and
- Two written estimates of moving and travel costs involving commercial carriers or rental agencies. Individual has the choice of carriers taking into consideration quality, convenience, and costs at a comparable level.

**Moving** – Up to **50%** of expenses associated with the physical moving of household goods- subject to the total limit of **\$500** per individual. If individuals prefer to move themselves, the reimbursement will be for one vehicle to load and deliver the goods. A reasonable number of trips to accomplish the move with the one vehicle will be reimbursed. There will be no reimbursement for a person's time. For re-locations outside of 100-mile radius commercial movers will be encouraged. Weight limit for all carrier household goods may not exceed 18,000 pounds

**Lodging** – Expenses for overnight lodging which may be required during the move will be reimbursed based on receipts up to a maximum allowed by the federal per diem rate for the area of lodging. Per diem rates may be found at <https://www.gsa.gov/>.

**Other costs** incurred during the move or upon immediate arrival in the new area may be reimbursed upon individual circumstances and as approved by the WIOA staff member **prior** to the individual incurring any expenses.

**Technology** – Items such as laptops, internet service monthly fees, etc. may be paid if the expense is necessary for employment or training purposes. **\$1000 lifetime maximum / \$50 monthly maximum**

**Transportation** –Bus passes/tokens, mileage reimbursement, or gas vouchers/cards may be used, but not in combination for the same participant.

- If provision of a bus pass or other public transportation meets the needs of the participant, it should be the first option to consider.
- Mileage reimbursement must be **at the current federal reimbursement rate** but is capped at **\$300** per month. Standard mileage rates can be found on the IRS website at <https://www.irs.gov/tax-professionals/standard-mileage-rates>. If the individual is in training and has access to a city bus pass through the training institution, documentation on why other transportation is necessary must be in the case file before transportation support can be paid. Transportation reimbursement must be consistently applied to all participants and must be documented with logs.
- Gas cards may be used but must not exceed **\$300** per month. Gas cards must be consistently applied to all participants and must be documented with logs.

#### **Other Transportation**

- **Driver's Licenses** – Up to **\$150 lifetime** limit. Driver's training courses, instruction permits, testing, and licenses are allowable.
- **Vehicle Repairs** - The maximum lifetime limit for repairs is **\$1500**. Automotive repairs will be provided and will be limited to what is required to offset cases of extreme hardship to a program participant. The need for the care for training or work-related activity should be documented.

Other requirements include:

- The vehicle must be owned by the enrolled individual or in the case of a youth participant, his/her parents.
  - The vehicle needs to be current on State registration,
  - The individual needs to have a valid driver's license.
  - Two written estimates of repairs must be submitted.
- **One Month Driver's Insurance** – Up to **\$500 lifetime** limit. Liability, Uninsured Motorist, and Underinsured Motorist may be provided for one month only.

**Tools** – Up to \$1,500 per individual lifetime limit. Protective Eyewear and safety eyeglasses are acceptable. The type, quality and amount will be within usual, customary, and reasonable standards. If employment is terminated prior to 180 days of employment or prior to the completion of training, the tools or equipment will be returned to the Western Wisconsin Workforce Development Board, Inc. The Service Provider has the responsibility for recover of the tools to be returned to the WDB. The participant has the option to repurchase the tools at a discounted price and must work with the Service Provider to do so.

- **For Employment** - A bona fide offer of employment with start date and a statement from an employer specifying the exact tools or equipment needed for employment must be provided. Tools for entrepreneurial efforts are prohibited.
- **For Training** – Participant must be enrolled in the training course and a statement from the training institution specifying the exact tools or equipment needed for the training must be provided

**Other Support Services and Waivers to Exceed Guidelines** – Support services not specifically mentioned above will be considered on an individual basis with the amounts determined based on the needs of the individual, as documented in the IEP/ISS, and needed for success in the program. Service Provider must gain written approval of the WDB Director or designee before the expense is incurred.

#### **NEEDS-RELATED PAYMENTS**

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Needs-related payments can be made to participants to help them cover non-training expenses while participating in a training program. Without the help of needs-related payments, participants may be unable to successfully participate in training.

Needs-related payments are not taxable. Participants should not report them as income, and IRS Form 1099 does not apply.

To receive needs-related payments, participants must, at minimum, be:

- unemployed;  
AND
- not receiving unemployment insurance (UI) benefits or trade readjustment allowances (TRA) because the individual does not qualify or is an exhaustee;  
AND
- enrolled in a training program that has already begun or will begin within 30 calendar days.

Dislocated Worker Program participants must meet the criteria above and must also be enrolled in a training program by the later of:

- the end of the 13th week after the most recent layoff that qualified them as a dislocated worker  
OR
- the end of the 8th week after they were informed by their employer that a short-term layoff would last longer than 6 months.

Examples:

- Participant A was permanently laid off on January 3, 2018. Thirteen weeks from this date is April 4, 2018, and the end of that week is April 7, 2018. Therefore, Participant A must be enrolled in training by April 7, 2018.
- Participant B was put on temporary layoff on January 3, 2018. Participant B was notified on March 15, 2018, that the layoff would be permanent. May 10, 2018 is 8 weeks from the day Participant B was notified that the layoff would be permanent, and the end of that week is May 12, 2018. Therefore, Participant B must be enrolled in training by May 12, 2018.

Tip: Use a free online date calculator to help calculate dates.

## **PAYMENT LEVELS**

### Adult Program

Payment levels Adult Program participants cannot exceed the federal poverty line at the time of participation in WIOA Adult.

### Dislocated Worker Program

Payment levels for Dislocated Worker Program participants cannot exceed the greater of:

- the weekly UI benefit rate resulting from the qualifying dislocation  
OR
- the federal poverty line at the time of the qualifying dislocation.

### Youth Program

Payment levels Youth Program participants cannot exceed the federal poverty line at the time of participation in WIOA Youth.

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## **SECTION 14 - EXIT AND FOLLOW UP**

WIOA participants will exit once they have not received an active service for 90 days and no future services are planned. The exit date will be the date of the last service. The follow-up period is one calendar year after the exit date, but may be adjusted, based on the needs of the individual.

Communication will occur at least quarterly during follow-up for two general reasons: 1) offering of follow-up services, and 2) collection of information for reporting purposes.

### **OFFERING FOLLOW-UP SERVICES**

Follow-up services, including counseling regarding the workplace, must be made available to ensure the participant is able to retain employment, realize wage increases, and facilitate career progression.

Actual services provided must be documented both in ASSET Follow-ups, Follow-up Services and ASSET Customer Notes.

### **DATA COLLECTION**

Supplemental data satisfies reporting outcomes when employment and earning data is not available from state and interstate wage records. Supplemental employment and earning data may be collected

during a participant's first four full quarters after exit. Wisconsin's WIOA Title I Programs ***must attempt a minimum of one time per quarter*** to collect supplemental data in the following cases:

- when a program participant does not provide a social security number (SSN) for matching with quarterly wage record information;
- when a program participant is employed by business or in an occupation that is excluded by state unemployment insurance law. Businesses with "excluded employment" are not required to provide employee SSN and quarterly earnings to the state's unemployment insurance agency;
- when UI wages are not reported per the Supplemental Data report in ASSET.

More information about supplemental data can be found in the DWD WIOA Title 1A and 1B Policy & Procedure Manual at <https://dwd.wisconsin.gov/wioa/policy/11/11.21.htm>. In addition, ask the WDB Operations and Compliance Specialist for guidance relating to your specific participant.

Regardless of the need for supplemental data, the career planner must enter as much data as possible into the ASSET Follow-up Status for every quarter of follow-up.

#### ADULT & DISLOCATED WORKER FOLLOW UP

The service provider must make available follow-up services for adults and dislocated worker participants who are placed in unsubsidized employment, for up to 12 months after the first day of employment. Staff should offer follow-up services unless the participant refuses. If a participant refuses follow-up services, this must be documented in case notes and on the Contact Standards Form. Refusing services does not permit the termination of contact, as there are reporting requirements. The Rights and Responsibilities form signed at the time of enrollment says that they will respond to these contacts.

For the Adult and Dislocated Worker programs, training and supportive services (participant funds) may not be spent on follow-up, but staff time expertise is needed to effectively engage participants to provide career services and collect information.

Examples of WIOA Adult and Dislocated follow-up services include:

- Career planning and counseling
- Assistance with work-related problems
- Contact with the participant's employer
- Peer support groups
- Supportive service referrals
- Information regarding educational opportunities

#### YOUTH FOLLOW UP

Services under this program element are provided after program exit to help ensure the youth is successful in employment and/or postsecondary education and training. Some follow-up services may include other program elements; to count as follow-up services, they must occur after the participant's exit date. Follow-up services include:

- supportive services;
- adult mentoring;
- financial literacy education;

- career awareness, exploration, and counseling services;
- postsecondary education preparation and transition activities; and
- contact with the participant's employer, including assistance in addressing work-related problems that arise.

For the Youth program, supportive services are allowable during follow-up.

Follow-up services may begin immediately following the last expected date of service in the Youth Program (and any other program in which the participant is co-enrolled) when no future services are scheduled. Follow-up services do not cause a participant's exit date to change or trigger re-enrollment in the WIOA Youth Program. Follow-up services must be reported in Manage Follow-ups, Follow-up Services in ASSET.

All youth participants must be offered the opportunity to receive follow-up services that align with their ISS for a **minimum of 12 months**, unless participants decline to receive follow-up services or cannot be located or contacted. Follow-up services may be provided beyond 12 months. 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. Unsuccessful attempts to contact a participant or contacts made simply to secure documentation for program performance indicators do not count as follow-up services. Before ceasing contact attempts, strategies as outlined in Section 4 must be used and documented.

For the Youth program, in addition to case notes, data must be entered into the *Follow-up Status* portion of ASSET. To receive performance credit for continued education during the Unsubsidized Employment or Education measures during the 2<sup>nd</sup> and 4<sup>th</sup> quarters after exit, the status must be entered on this screen.

## **SECTION 15 – MONITORING**

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All WIOA enrollments will be edit checked by the WIOA Operations and Compliance Specialist (OCS). Career planners will notify the OCS via email within 5 business days of the Date of Title 1 Participation for an enrollment. The OCS will review for compliance with DWD and WDB policies and respond via email.

The OCS may perform other edit checks and file reviews as deemed necessary from results of DWD monitoring activities.

## **SECTION 16 – RECORDS MANAGEMENT**

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### **Protection of Records**

The US Office of Management and Budget (OMB) defines Personal Identifiable Information (PII) as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. (TEGL 39-11)

Protected PII is the most sensitive information that you may encounter in the course of your grant work, and it is important that it stays protected. Grantees are required to protect PII when transmitting information, but are also required to protect PII and sensitive information when collecting, storing and/or disposing of information as well.

Outlined below are some recommendations to help protect PII:

- Before collecting PII or sensitive information from participants, have participants sign releases acknowledging the use of PII for grant purposes only.
- Whenever possible, the Department of Labor Employment and Training Administration (DOL-ETA) recommends the use of unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to the each individual record. Once the SSN is entered for performance tracking, the unique identifier would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.
- Use appropriate methods for destroying sensitive PII in paper files (i.e., shredding or using a burn bag) and securely deleting sensitive electronic PII.
- Do not leave records containing PII open and unattended.
- Store documents containing PII in locked cabinets when not in use.
- Immediately report any breach or suspected breach of PII to the WIOA Data Steward for Western Wisconsin Workforce Development Board at 608-386-8421 or [scarborougha@westernwdb.org](mailto:scarborougha@westernwdb.org). This individual will investigate the breach and, when necessary, report it to State personnel and DOL. Staff will follow any instructions received from officials of the State or Department of Labor

### **Records Retention**

All records pertinent to grants and agreements funded by WIOA must be retained for a minimum of **three years**.

This includes, but is not limited to:

| Type of Record   | Three-Year Retention Period Begins  |
|--|---|
| All financial records, supporting documents, statistical records, and property records.  | Date of submission of the final expenditure report or quarterly or annual financial report                      |
| All records pertinent to each participant's enrollment in programs funded under the agreement, including the dates of entry and termination in each activity | Participant's <u>common exit date</u> , as determined in ASSET  |
| All records pertinent to <u>applicants</u> that have been determined eligible, but not served  | Date of the eligibility determination   |
| All pertinent records of each <u>applicant</u> who is determined ineligible  | Date of the ineligibility/refusal determination; the records must indicate the reason for ineligibility/refusal |

|  |  |
|--|--|
| All records pertinent to complaints/grievances, appeals, and resolutions | Date the complaint/grievance is closed following final settlement of the case. |
|--|--|

In any case where a litigation, claim, or audit is started before the expiration of the three-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken. In these cases, a new three-year retention period will begin on the day the litigation, claim, or audit finding is deemed to be resolved.

In cases where the federal awarding agency (USDOL) requires an extended retention period, DWD-DET may require an extended retention period of its grantees and/or subrecipients.

The WDB and its subrecipients are responsible for entering required data in the appropriate electronic systems of record, as outlined in [Section 1.6.2 of the WIOA Title I-A & I-B Policy & Procedure Manual](#). Information contained in DWD-DET's electronic systems of record, including participant-specific documents uploaded to ASSET using the document upload functionality, is considered part of DWD-DET's records and will be retained in accordance with [ADM00013 – Grant Documentation](#). This includes participant-specific documents uploaded to ASSET using the document upload functionality.

Costs related to records retention are allowable costs and may be charged to the DWD-DET grant.

## SECTION 17 - DEFINITIONS

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**Class Based Training** – A program at a technical college or on-line program that is accredited and leads to a credential or degree. This is a typical “class” at a training institution for which tuition is typically paid.

**Class-Sized or Contracted Training** – Includes training which is contracted for a specific group of individuals. The Training must be provided by an accredited institution and lead to a degree or certificate.

**Contact** – Participant contact occurs when either the participant or the Career Planner make a one-to-one contact attempt, and meaningful communication occurs.

**Dependent Care** – To assist participants who are not able to participate in WIOA services without such assistance and who are unable to obtain other childcare assistance. This includes participants who are in danger of dropping out or making less than satisfactory progress due to unsatisfactory or unreliable childcare arrangements.

**Documentation of Need** – The need for supportive services can be documented via the assessment process, development of the Employment Plan, a request form completed by the participant, or ASSET case notes. If a support service is provided there must be some documentation to support the necessity of providing the service.

**Documentation of Referrals** -The type of documentation required to support the lack of other available resources should be relative to the type of supportive service provided. Career Planners should be familiar with local resources and typically will not need to devote an inordinate amount of time to locate and document other sources of funding for supportive services. For

example, if the assessment process identifies that a participant needs transportation assistance to attend school, a case note or the Employment Plan could indicate that the participant cannot ride with a classmate, or the class schedule does not fit with the bus schedule. However, if the participant needs car repairs or rent assistance, there should be more evidence of referral to other resources (WETAP, local housing agencies, community agencies, etc.). If a participant is requesting assistance with the payment of utilities or a phone bill, at a minimum there should be evidence of attempts to establish a payment plan with the company.

**Education-related Application Fees** –Fee paid to determine a participant's eligibility and acceptance at the educational institution, and which will allow the client to obtain information on financial aid awards.

**Emergency Assistance** – A one time or rare expense paid to allow a customer to continue participating in WIOA activities such as school, work experience, On-the-Job Training, etc. If the customer is having extreme financial difficulty, staff should be assisting him/her with needed financial information (development of a budget, credit counseling, debt management, etc.). Emergency assistance payments must be well documented in the case file. If there is confidential information, ASSET case note should be marked as "confidential". Examples of emergency assistance include:

- Payment of utility bills (electric, water, heating, etc.)
- A rent payment

As with all other WIOA funding, all other options should be sought first. For example, heating and cooling assistance could be pursued through resources such as: Low Income Home Energy Assistance Program (LIHEAP), Salvation Army's "Heat Share", local programs, and faith-based organizations. Rent assistance could possibly be obtained through the U.S. Department of Housing and Urban Development (HUD). In addition, the possibility of setting up a payment plan with the utility company/landlord should be explored and documented.

#### **Economic Self-Sufficiency (ESS) Calculator**

DWD-DET developed a calculator that career planners must use to establish whether individuals they serve are economically self-sufficient according to the ESS definition. The career planners' ESS calculator is accessible in the CEPT application, through the "Self-sufficiency" widget.

#### **English Language Learner**

The term “English language learner” when used with respect to an eligible individual, means an eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language, and—

- (A) whose native language is a language other than English; or
- (B) who lives in a family or community environment where a language other than English is the dominant language. WIOA Sec. 203(7)

**Follow-up Services** – Youth participants in follow up are eligible for support services if the IEP/ISS indicates a need to maintain employment or education placement; adult and dislocated workers are not eligible for support services during follow up.

**Incumbent Worker Training** – Training to provide an employed participant with qualifications for positions of greater skill, responsibility, remuneration or career advancement with the current employer.

**Individual Costs** – Any costs for training and support services incurred on behalf of the individual. Individual costs are requested using a voucher or other system that can be audited.

**Individual Employment Plan (IEP)** – developed by client and WIOA staff members to outline goals and steps needed to reach an employment goal.

**Individual Training Accounts (ITAs)** – A voucher/purchase order or collection of vouchers/purchase orders that allows an eligible adult or dislocated worker to access and pay for training from a provider listed on any State approved list of eligible training providers.

**Non-Traditional Employment** – Occupations or fields of work where a gender comprises less than 25% of individuals employed in such occupation or field of work.

**Occupational Classroom Training** – Classroom training which follows a set curriculum and is focused on skills for a specific occupational area. The intent of such training is to provide the individual with technical skills and knowledge required to perform a specific job or group of jobs.

**Self Sufficiency** – <https://dwd.wisconsin.gov/wioa/policy/08/08.3.4.htm>

For the **Adult Program**, participants are considered economically self-sufficient if they:

- have individual income that meets or exceeds 125 percent of the ESS level for a single adult household in their county of residence;
- have household income that meets or exceeds 125 percent of the ESS level for their household composition in their county of residence;  
AND
- have household income that meets or exceeds the LLSIL for their household size.

For the **Dislocated Worker Program**, participants are considered economically self-sufficient if they meet all the above criteria and one of the following:

- have an individual income that meets or exceeds 80 percent of their dislocation wage;  
OR
- have an individual income that meets or exceeds the 75th percentile of wages for all occupations in their county of residence.

**Student Award Letter** – A letter prepared by the training institution which tells the student what their calculated need is, and what aid the school will be able to provide.

**Targeted Sectors**- Targeted sectors refer to those industries deemed to have significant impact on the economy of Western Wisconsin. The identified targeted sectors are Construction, Manufacturing, Transportation, Healthcare, and Information Technology.

**Trade Act Funding (TAA)**- If customer is enrolled in Trade Act, this funding source must be utilized prior to WIOA funding. If the customer needs resources not covered by Trade Act, local policy

should be followed to provide these wrap-around services.

**Training Costs** – This includes items associated with training such as tuition, books and materials, assessments, On-the-Job Training (OJT), internships, and registered pre-apprenticeship programs. Although training costs include books, fees, and materials, these items are to be recorded as support services expenditures.

**Work Experience** – Work Experiences are planned, structured learning that take place in a workplace for a limited period. A formal work experience agreement must be developed with the worksite. Work experience may be paid or unpaid. WIOA funding can be used to pay wages and related benefits for work experience in the public, private, for-profit, or non-profit sector.

**Workforce Development Area (WDA)** – areas designated by the Wisconsin Department of Workforce Development. Western Wisconsin is WDA 9.

**Wisconsin Educational Approval Board (WEAB)** – All in-state nonprofit schools (which began operating after January 1, 1992) and all out-of-state nonprofit schools that offer or advertise services in Wisconsin regardless of how long in operation, must be licensed by the WEAB to do business in the State.

## **SECTION 18 – FORMS**

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WIOA participant forms are currently being reviewed. Service provider forms are transitioning to being issued by the WDB and will be found on the WDB website at <https://www.westernwdb.org/plans-reports-publications>.

### **REFERENCES**

1. Documenting Progress through Case Notes, Lengel Vocational Services  
[https://ion.workforcegps.org/-/media/Communities/ion/Files/Effective-CC-Case-Management/Case\\_Notes\\_Documentation.ashx](https://ion.workforcegps.org/-/media/Communities/ion/Files/Effective-CC-Case-Management/Case_Notes_Documentation.ashx)
2. WIOA Policy and Procedure Manual – <https://dwd.wisconsin.gov/wioa/policy/>
3. Guide to Eligibility Determination and Documentation -  
<https://dwd.wisconsin.gov/wioa/pdf/eligibility-documentation-201507.pdf>
4. WIOA Regulations - [https://dwd.wisconsin.gov/wioa/pdf/2016\\_15975\\_final\\_regs.pdf](https://dwd.wisconsin.gov/wioa/pdf/2016_15975_final_regs.pdf)
5. WIOA Law - <https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf>
6. Code of Federal Regulations, Part 681

*The Western Wisconsin Workforce Development Board and its service providers are equal opportunity employers and service providers. If you have a disability and need to access this information in an alternative format, or need it translated to another language, please contact Melisa Myers, 608-789-5499, [myersm@westernwdb.org](mailto:myersm@westernwdb.org) or Wisconsin Relay 711.*

### **Babel Notice**

In accordance with 29 CFR 38.9 (g)(3), Limited English Proficient (LEP) individuals seeking access to information about WIOA programs offered through the Western Wisconsin Workforce Development Board and its American Job Center partners, will receive language assistance in all communications of vital information. Vital information is defined as information, whether written, oral, or electronic, that is

necessary for an individual to understand how to obtain any aid, benefit, service and/or training; necessary for an individual to obtain any aid, benefit, service and/or training; or required by law.

An interpreter, as well as the availability of free language assistance such as rulebooks; written tests that do not assess English language competency, but rather assess competency for a particular license, job, or skill for which English proficiency is not required; and letters or notices that require a response from the beneficiary or applicant, participant or employee will be provided to all LEP individuals at no cost to the individual.

WIOA Title I-financially assisted programs or activities or offerings provided by E3 Works are supported with federal funding from the Workforce Innovation and Opportunity Act (WIOA). E3 Works is an equal opportunity employer/program.

#### **English**

**IMPORTANT!** There are documents that contain important information about WIOA training services; how to apply for training services; and your rights, responsibilities and/or benefits. It is critical that you understand the information in these documents. You can receive telephone translation assistance of all documents by calling (608) 789-5499 at no cost to you.

#### **Español**

**¡IMPORTANTE!** Hay documentos que contienen información importante acerca de los servicios de capacitación de WIOA, cómo solicitar servicios de capacitación, sus derechos, responsabilidades y / o beneficios. Es fundamental que entienda la información de estos documentos. Usted puede recibir asistencia de traducción telefónica con la traducción de todos los documentos llamando al (608) 789-5499 sin costo alguno para usted.

#### **Hmong**

**TSEEM CEEB!** Muaj cov ntaub ntawv uas muaj cov ntaub ntawv tseem ceeb ntawm WIOA cov kev pabcuam kev cob qhia; yuav ua li cas thiaj li thov rau cov kev pabcuam kev cob qhia; thiab koj cov cai, lub luag haujlwm thiab / lossis cov txiaj ntsig. Nws tseem ceeb heev uas koj to taub cov ntaub ntawv nyob hauv cov ntaub ntawv no. Koj tuaj yeem tau txais kev pab txhais lus hauv xov tooj ntawm tag nrho cov ntaub ntawv uas yog hu rau (608) 789-5499 yam tsis tau them nqi.

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