TRI COUNTY WORKFORCE INVESTMENT BOARD

WORKFORCE SERVICES POLICY MANUAL

TCWIB Workforce Services Policies
Approved May 14, 2013

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CUSTOMER APPLICATION AND SELECTION POLICY

The Tri-County Local Workforce Investment Board service delivery system assists customers who are economically disadvantaged and have one or more “target barriers” to employment or who are “dislocated workers.” The key customer characteristics-target barriers applicable to the WIA Adult program include:

- high school dropout, no GED,
- single parent,
- veteran,
- math or reading below 8th grade level,
- substance abuse
- documented “disability” that interferes with employment,
- offender,
- homeless, and
- Public Assistance Recipient, TANF, Food Stamps, general Assistance.

WIA requires the following youth target barriers:

- deficient in basic literacy skills,
- school dropout,
- homeless,
- runaway,
- foster child,
- pregnant or parenting,
- offender and
- individual (including a youth with a disability) who requires additional assistance to complete an educational program.

Dislocated workers include applicants who lost their job due to no fault of their own.

Priority of Service Policy

The Tri-County Workforce Investment Board has established the following guidelines regarding access to WIA services.

- Core services will be universally available to everyone who chooses to access them;
- Access to intensive and training services will be limited to residents of the Tri-County area identified as most in need of such services. At minimum, most in need for WIA Adult services is defined as recipients of public assistance or other low income individuals with barriers to employment. Priority for services is as follows:

    1. First Priority for intensive and training services will be given to unemployed recipients of public assistance and other low income individuals who have barriers to employment.
    2. Second Priority, should funds be available will be given to other unemployed individuals with barriers in need of intensive or training services in order to obtain or retain employment that allows for economic viability.
    3. Third Priority, should funds still be available, will include other unemployed, underemployed, or employed individuals in need of intensive or training services to obtain or retain employment that allows for economic viability.

- Access to youth activities funded by WIA funds will be limited to residents of the Tri-County area. All other youth eligibility and priority criteria will be in accordance with the requirements established by WIA, pertinent regulations and the Maine State Policy.

<u>NOTE:</u> The Tri-County Workforce Investment Board is party to a "Reciprocity of Services Agreement" with the other WIB's in Maine that specify the delivery of services to applicants for WIA services who reside outside the geographic boundaries of the local workforce area(s) under specific conditions.

Applicant Pool

Through a common intake process, all customers must apply for and "qualify" for WIA programs in order to receive intensive and training level services. EMDC makes a conscientious effort to invite all customers who demonstrate a significant need for WIA services to participate in its services. At the same time we recognize that funding under WIA is limited. In order to develop a system capacity to accommodate larger number of core service customers, while meeting the need of individuals based on the priority guidelines, an applicant pool list of individuals who have been verified as eligible for services will be maintained. The applicant pool will be based on the "date of registration" and we will offer services to individuals who meet the priority guidelines in order of their registration for such services. These lists will be periodically updated to remove individuals who are no longer interested or available for intensive or training services.

Intake

Intake is the process by which applicants are determined to qualify for WIA Title I programs. EMDC will make regularly scheduled WIA application sessions or intake appointments available to the general public in each office location. The WIA application schedule will be made available to other Career Center partners and other referral agencies in the community. While the WIA application will generally be completed in group sessions to maximize access to services, individual application appointments may be facilitated to accommodate special needs or in some locations where group sessions are not efficient due to low level of demand.

All applications must be verified with supporting documentation as per WIA rules and regulations. All verification documents are to be sent to Data Management where a secondary review and certification sign off will be completed before the applicant is deemed eligible or ineligible for WIA services.

Applicant Assignment

All verified eligible applications that were completed through a group intake session will be reviewed and assigned to a Career Advisor by the Data Management Specialist for a follow-up Applicant Interview. The Career Advisor assignment process will take into account geographic and caseload demand considerations; program specialization; or other considerations based upon the applicant's or Career Advisor's stated preferences/circumstances. If the application was completed during an individual appointment with a Career Advisor, the applicant will be assigned to the Career Advisor who completed the application.

NOTE: Under no circumstances will an applicant be assigned to a Career Advisor who is related to the applicant by blood, marriage or other special relationship. The Career Advisor is required to disclose any special relationship with an applicant immediately upon becoming aware of the individual's application for services.

Applicant Interview

Each eligible applicant will be invited to have an interview with the assigned Career Advisor. The intent of the interview is to begin to establish documentation of the customer's need for further WIA assistance and whether he/she is deemed suitable for services. The initial interview includes a formal discussion of the customer's education, work experience/history, vocational interests and preferences, hobbies, special talents, transportation availability, financial subsistence/concerns, employment goals-type of work, hours per week and wage requirements, medical concerns-issues, other training-military, family support system, relocation preferences and personal issues. This interview will be scheduled within 7 working days from the date the applicant has been certified as eligible for services.

Case Review Meeting

The Career Advisor will complete an "Application Interview" form and present the findings to the next scheduled Case Review meeting with recommendations for enrollment in the program, further assessment or other disposition of the application. Based upon the case review results the applicant will be:

- Scheduled for further assessment activities as needed, leading to the development of an Individual Service Strategy (ISS);
- Referred to other services based upon the customer's expressed needs or circumstances with the option of re-applying for WIA services at a later date; or
- Informed that the program will not be able to serve him/her based upon the program limitations to meet the individual's expressed needs. This determination with the reasons specified will be provided to Data Management by the Career Advisor to be maintained in the applicant's file.

CUSTOMER ASSESSMENT POLICY

All applicants selected for enrollment in WIA will be scheduled for in-depth assessment including basic academic skills, unless assessment services are waived. The assessment results provide the customer and Career Advisor the framework to facilitate informed career choices, establish viable re-employment plans, and identify training and other service needs. The Career Advisor will use appropriate diagnostic tools to identify academic proficiencies, vocational aptitudes, occupational interests, transferable skills and work values critical to the development of a viable Individual Service Strategy (ISS) with the customer.

Basic Skills Assessment

EMDC currently use the Comprehensive Adult Student Assessment System (CASAS) to assess basic academic skill levels. All WIA applicants should undergo CASAS testing and assessment prior to the development of an Individual Service Strategy. Exceptions to the CASA testing requirement may be made if other information is available determine reading or math skills grade levels, such as:

- A school record of reading or math level determined within the last 12 months.
- Results from a generally accepted standardized test administered within the last 12 months.
- If an applicant is unable to read and, therefore, cannot complete a self-application for the WIA program, she/he may be considered to have English reading skills below the 8th grade level.

Individuals with any of the following may be considered to have English, reading or math skills above the 8th grade level and thus would exempt a customer from a Basic Skills Assessment:

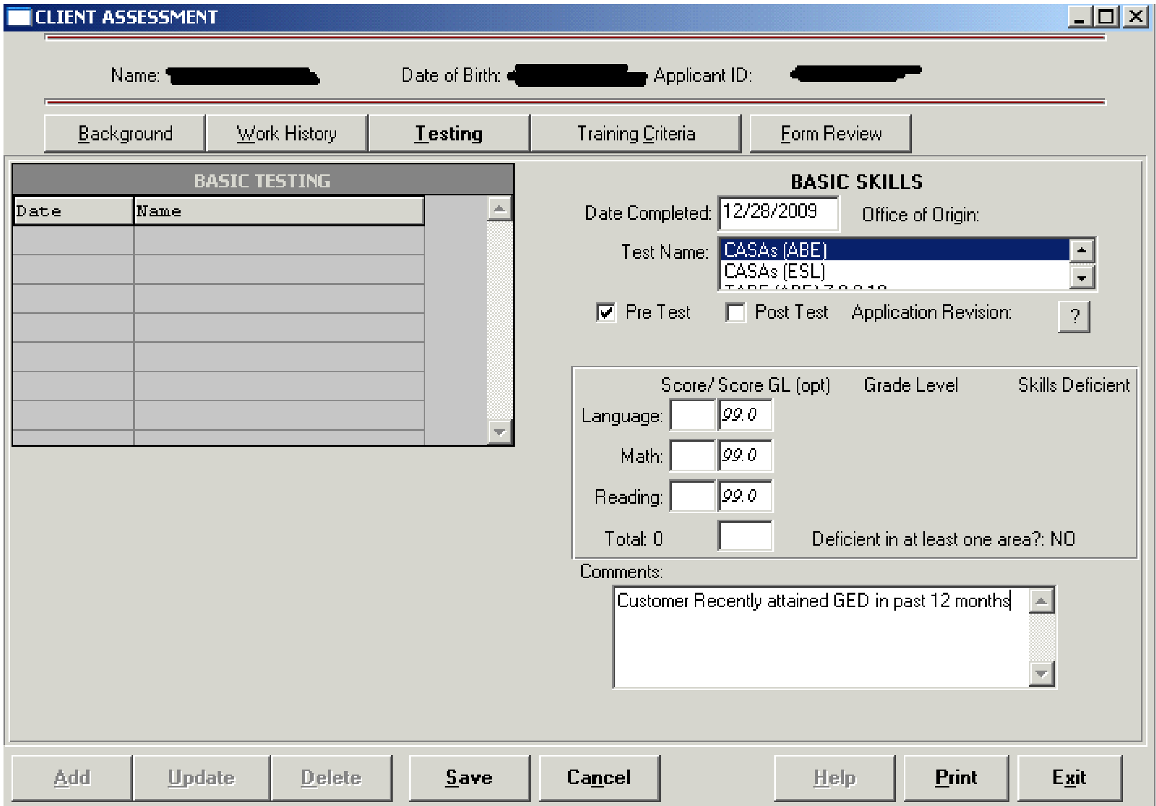
- A GED certificate received within the last year.
- A degree (usually a BA or BS) conferred by a 4-year college, university or professional school.

If there is any question regarding reading or math ability, a standardized test should be administered.

Assessment Documentation

Basic Skills assessment results must be documented in OSOS. See assessment screen shot below. There is also a comments section on the assessment screen in OSOS. If you choose to waiver a customer from a basic skills assessment for any of the allowable reasons, you should document this with a note in the comments field. Likewise, if you allow additional time during an assessment due to a specific disability, that should be noted in the comments box as well.

Below is an example of an assessment screen for a customer in which the assessment was waived. All other customers would have the scale score of their CASAS or grade equivalence of their TABE results indicated. Please note assessment is tied to a particular enrollment and is identified as pre and post. You must check the appropriate radio button and link to the enrollment application.



NOTE: Additional test score information.

13.0 Individuals assessed as grade 13 and above.

88.0 Individuals who refused testing or could not be tested.

99.0 Individuals with a four year college degree or above (BA, MA, PhD). No testing required.

NOTE: Grade level scores below 9.0 (e.g., 8.9) should be considered as at or below the 8th grade level.

NOTE: Anyone who has a reading or math skill grade level at or below the 8th grade is considered to have a barrier to employment.

INDIVIDUAL SERVICE STRATEGY (ISS) POLICY

WIA legislation and LWIB policy require that an employability plan be completed with each customer as part of their receipt of intensive and training services. EMDC as the local WIA EMDC for Title I refers to the employability plan as the Individual Service Strategy (ISS). The ISS must be completed, signed by the Career Advisor and customer, and approved by the Deputy Director or designee , before enrollment in a program and expenditure of training or any support services funds related to training or participation may be expended on behalf of the customer.

The Individual Service Strategy is the embodiment of the customer's career education and/or employment plan in a written document and outlines the education, training or other career-related services a customer needs to achieve his/her goals. The primary goal for each ISS should be that when the customer completes all the planned activities' he or she is employable, marketable and competitive in the identified career field or job.

The training/employment goals must be aligned with local labor market opportunity as documented by the LMI data published by the Center for Workforce Research and Information (CWRI). EMDC will analyze job placement outcomes on a regular basis in an effort to identify employment trends within the program and to document wage and retention tends. This information will be also used by Career Advisors when working with clients to establish career/employment goals.

Occupations for which labor market information forecasts as declining or as having a history high turn-over or a low wage at placement with little opportunity for growth or may impose inherent low probability for success based on other factors such as large numbers of skilled workers laid-off from the occupation should not be considered viable training occupations. These occupations should raise red flags for the Career Advisor regarding supporting a customer's interest in training for those occupations.

Career Advisors may work with their peers to address specific customer situations, unique training or employment proposals and to obtain additional professional feedback prior to submitting an ISS for approval. If the customer requests service that the Career Advisor is not be able to support the applicant will be afforded an opportunity to submit his/her plan directly to the Deputy Director for consideration.

NOTE: The ISS must be reviewed and signed by the Deputy Director or designee (Senior Career Advisor).

Additional standards for approving those plans will include:

- Intent or promise in writing by an employer in that field that they will hire the customer after training. The promise must include an estimated starting wage, hours to be worked and status of benefits; or
- In the case of someone going into business, the completion of a business plan that documents sustainable work in that field.

ISS Decision Making Points and Standards

Many situations exist that influence the ability of the customer to participate in an employment and training program or in the level and type of services made available. The Career Advisor's decision to enroll a customer into a program is the result of the analysis of this situational information. The analysis is reflected in the design of the Individual Service Strategy.

Below are customer characteristics or situations to look for that can act as guiding principles to facilitate enrollment decision-making, level of services offered and the Individual Service Strategy design.

Education: What is the applicant's current level of educational attainment; prior experience with education and training programs and eligibility for financial aid resources.

Does the customer have an existing post-secondary education diploma, certificates, or degree; and is the prior education relevant to current labor market opportunities or otherwise transferable to other fields. If yes, re-training may not be warranted unless other factors such as health or injury restricts the customer's ability to work in that field.

Is the customer already attending a post-secondary training program. If yes,

- Previous history of post-secondary education success or lack there of.
- Applicant/customer is (not) eligible to receive other means of financial aid.
- Applicant/customer is (not) in default on student loans.

Program Performance/Capability:

- Do employment and/or training goals result in wages or hours more or less than program performance standards?
- Are those goals attainable within program limits including cost or time limits?
- Are the goals based on a stable or growing occupational field/labor market?

Health:

- Does the customer have a medical condition that interferes with ability to participate at least 20 hours a week or impair the vocational aptitudes, physical and/or emotional abilities of the customer.
- Stability of medical conditions, unknown prognosis and/or where treatment modalities for health conditions interfere with the person's ability to participate in work.

Interest:

- Goals include a second post secondary degree or advanced degree.
- (Un) Willing to consider same, similar or related job goals where current skills, abilities and stable or growing labor market exist.
- Expressed/tested interests and goals.

- (Un) able or (un) willing to work at minimum part-time or 20 plus hours a week.

Behavioral/Personal/Family:

- Attendance and/or punctuality.
- Cooperation/Follow-through.
- Dress, grooming and hygiene compatible with labor market expectations.
- Substance abuse - documented sobriety or abstinence for six months or more.
- Applying for or receiving Social Security Disability (SSDI).
- Applying for or receiving Supplemental Security Income (SSI) based on employability.
- Demonstrated means of reliable transportation.
- Demonstrated means or consideration of reliable and/or cost-effective childcare.
- Applicant/customer is the primary care giver for an immediate family member.
- Applicant/customer family and\or financial subsistence support to reach employment and/or training goal.
- Customer expressed goals contradict or are not consistent with other mandatory service provider goals and objectives.
- Immediate family or significant other not supportive of efforts to train or work.

Customer Education and Individual Service Strategy Development

The existing education level of all new customers entering Career Advancement Service programs has a direct impact on the development of the ISS and the subsequent services targeted. As a point of reference, it is believed that those customers with existing education beyond the high school level demonstrate less need for post secondary level training or significant job skill training services. However, this is not to say that the need for employment or reemployment is any different, only that the prior education level in part dictates the need for job training system services.

The following service recommendations are designed using education levels as general guidelines to assist the Career Advisor in ISS Development and to facilitate the establishment of a delivery standard that promotes sustainable employment.

1. Existing four year degree and above: All internal EMDC services and skill enhancement opportunities up to maximum one year enrollment period are available to the customer. Immediate enrollment into Job Search for a minimum 15 hours per week is mandatory in ISS. No job training letters for regular Unemployment Insurance will be provided as the customer is considered a part time student in training and actively looking for work.

2. Existing two year degree and above: All internal EMDC services and skill enhancement opportunities up to maximum of one year enrollment period are available to the customer. Immediate enrollment into Job Search for a minimum 15 hours per week is mandatory in the ISS. No job-training letter for regular Unemployment Insurance will be provided as the customer is considered a part-time student in training and actively looking for work.

3. Existing education up to a two-year degree: All internal EMDC services and education enhancement opportunities will be available to the customer. For the full-time or part-time student, the maximum education assistance available is up to a two-year degree.

- If the customer is a full time student as determined by the training institution working toward a one-year diploma or a two-year degree, no formal actual job search is required in the ISS during the training period. A job-training letter will be provided up until the customer financially needs to actively seek work, their student status changes to less than full-time or the student enters the last quarter (three months) of their diploma or degree program.

- If the customer is a part-time student as determined by the training institution including Career Center, the ISS and enrollment activity will require an actual active job search for a minimum of 15 hours per week while in training and no job-training letter for regular Unemployment Insurance will be provided as customer is considered a part-time student in training and looking for work. The only exception is for customers whose Learning Center educational activity is preparing them for full- time student status as stated in the ISS.

4. **Adult Literacy (AL):** All customers who pursue Adult Literacy training (AL) must participate at a level that leads to completion of the activity within a maximum of a six-month time period. AL activities must lead to an individual's ability to participate at full-time or part-time student status.

Adult Literacy activities include:

- Remedial Education
- Tutoring and Study Skills
- Basic Skills
- Developmental Studies
- GED
- Literacy Training and ESL
- Bilingual Training
- Basic Computer Literacy

Dislocated Worker Benefits (DWB): DWB related training letters would be provided to any customer in any of the above categories as long as they demonstrate active education service level participation described and meet minimum training hours per week listed under each category. DWB benefits will conclude at the completion of a one-time job training option.

Individual Service Strategy - Assessment

The individual service strategy may incorporate a singular or multiple focuses leading to the customer achieving their employment and career goals. An in-depth assessment is an initial

intensive service enrollment activity that is specifically designed and required for all customers at this level. In-depth assessment provides the customer and the Career Advisor (Career Advisor) formal opportunity to determine employment, training and support service needs. Results of the assessment process will provide valuable enrollment option during the ISS development process. The following guidelines are provided to use for, during and following in-depth assessment.

NOTE: Assessment is a participant-centered and diagnostic evaluation of employment barriers in any one or more of the following areas:

- work history
- education
- occupational skills and abilities
- occupational interests
- occupational/vocational interests
- financial subsistence
- need for support service
- family situation
- work attitude, motivation, behavior patterns affecting employment potential

The assessment should reflect decisions concerning what the appropriate mix and sequence of services are to be provided leading to and including a realistic employment goal. Career Advisors should make every effort to establish the duration of the assessment period to the time to actually complete the evaluation of the areas listed in the ISS. Generally, Career Advisors should complete all initial assessment activities within forty-five (45) days or less.

NOTE: Acceptable Assessment Instruments include:

- structured interviews
- paper pencil tests

- performance tests
- behavioral observations
- interest inventories
- career guidance instruments
- aptitude tests
- basic skills test

The results of each applicant's assessment must be recorded in the ISS record stipulating to the criteria used in the selection process. This should include a narrative indicating the reasons for enrollment or non-enrollment into a direct training activity, the results of the components of the assessment, the names of the JTS staff involved in making the decision and the dates of the decision.

Developmental ISS

Occasionally, customers may be enrolled in a program before they have researched and identified employment goals, and hence, before a final ISS has been completed. The most common example is the customer who needs a GED before going on to vocational training, or who has low reading skills, self-esteem issues, etc. that would hinder the development.

A developmental ISS may be extended beyond the initial six-month plan, if there is documented evidence of progress and/or other extenuating circumstances. Through ISS revision, extensions for three months at a time may be granted.

Post Secondary Diploma and Degree Planning

When estimating and documenting the costs of post secondary training that promotes a formal one or two-year post-secondary degree, Career Advisors must use institution specific fixed rates for tuition, books, required tools and supplies, and fees to calculate costs. Documentation of the overall costs of the ISS should be requested from the institution either directly by the Career Advisor or the customer. In many cases, financial aid (at minimum

PELL grants) will be a required resource contribution to the overall financial package and must be factored in to determine the financial viability of the job training programs capacity to support this type of plan. **Customers are required to apply for federal financial aid.** Career Advisors should anticipate slight increases in tuition, fees and other costs from one academic year to the next.

Other (Customized) Training Package

A training package is generally considered a collection of courses and classes offered by one or more approved training institutions that are proven to meet the job goal qualifications or increase the existing qualifications of the customer. On-the-job training or Apprenticeship may also be included along with these courses as part of a more comprehensive training plan. In cost estimating the customized training ISS, the Career Advisor and/or customer must obtain written estimates of all costs associated with each training activity, workshop, or course for each institution. An institution's costs should be independently listed but collectively tabulated and included in the Service Needs Analysis section of the ISS.

ISS Minimum Content Standards and Management

At any given moment in time, fundamental standards of ISS activity management should be reflected in the customer OSOS record. ISS Minimum Standards include:

- Sustainable Employment and Career Goal (Job Title(s))
- Training Program Objectives (job specific skills)
- Comments that address identified barriers (services to meet the customers needs)
- ISS projected end date (based in-part on when customer must be working/employed)
- Employment goal wage for local economy (meets customer subsistence goals)
- Employment Plan Comments (special considerations)
- Service Needs Analysis (All projected costs and funding resources of education and support services)
- Employment outlook that is stable or growing to include local and state occupational

outlook information

- Assessment of existing work skills, vocational interests, achievement abilities and aptitudes; documentation of all standardized assessment techniques administered
- Assessment narrative that addresses conclusions of the assessment results-strengths and weaknesses to plan success

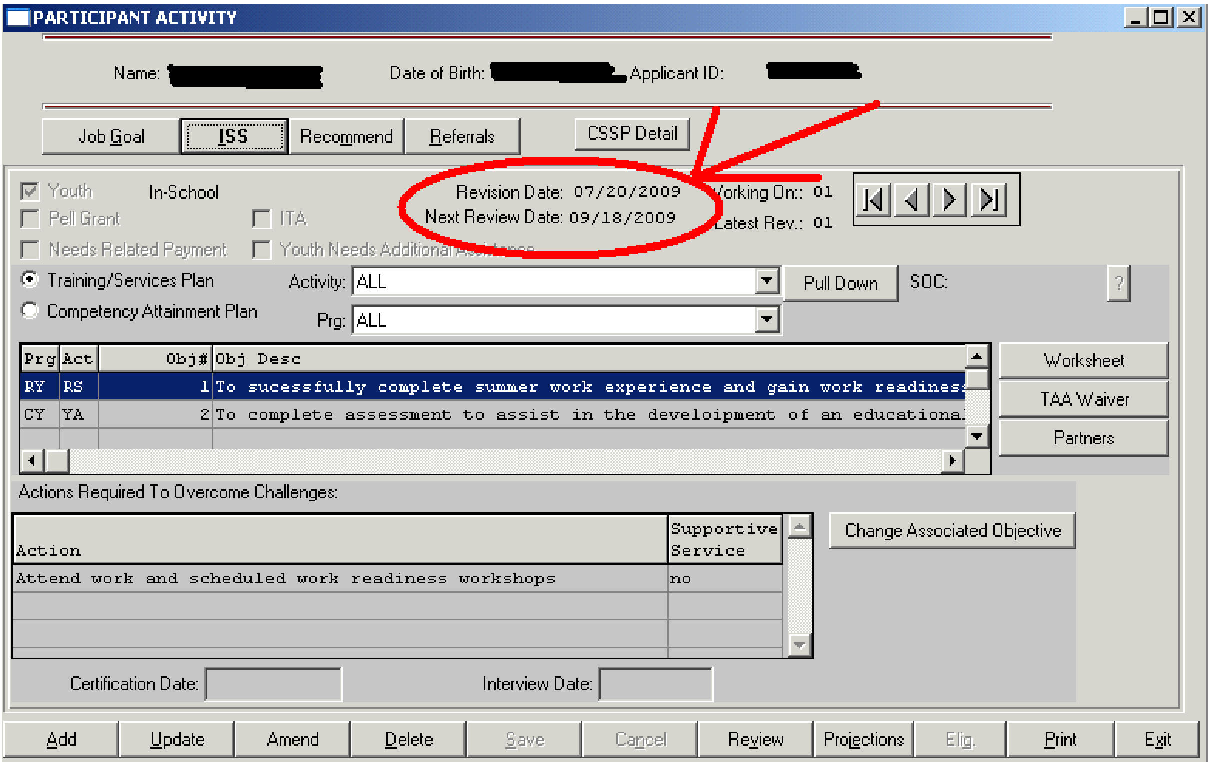
ISS Amendments

With the exception of extension amendments, amendments to the ISS must follow the same approval process as for new ISS. Examples of when ISS amendments are appropriate include:

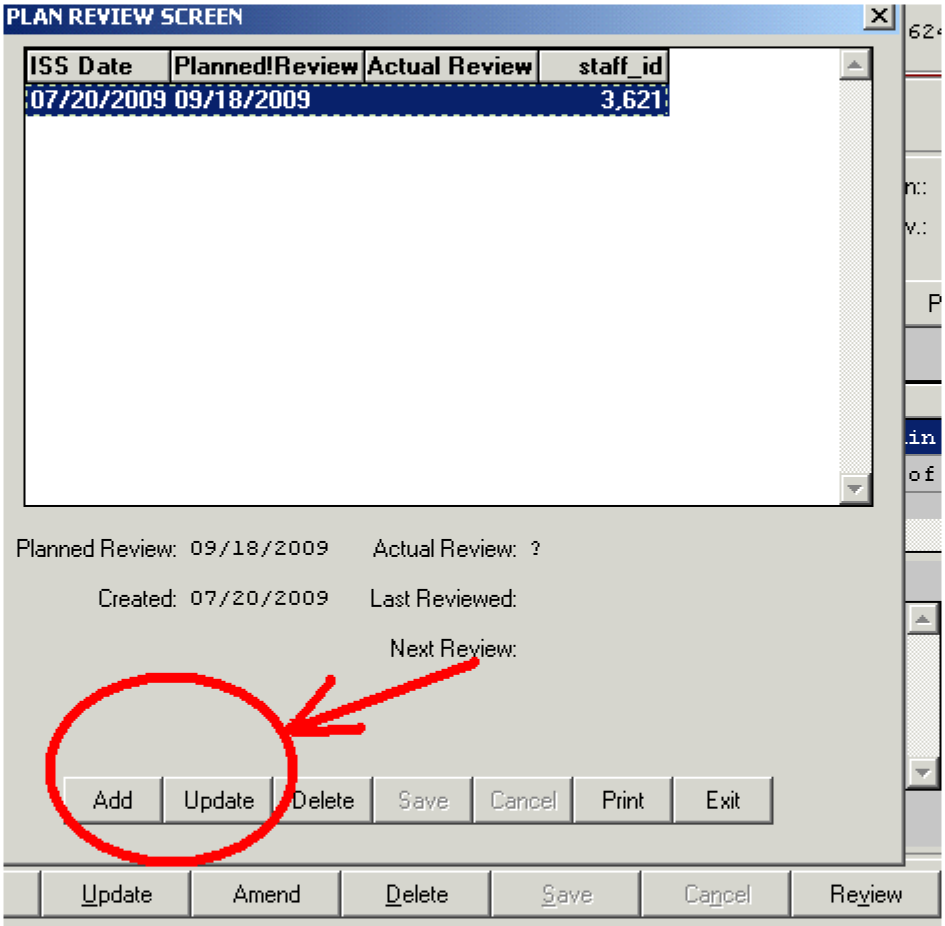
- The customer and Career Advisor agree on a change in employment goals.
- Training time or training program changes.
- Material changes in customers' circumstances.
- Training and support service cost changes.
- Funding source changes.

ISS Review

OSOS has a place to identify "next review" when creating an ISS and this data is available to track via the "Staff Tools" section of OSOS under "Data Management for Caseloads".



It is not uncommon that a Career Advisor may enroll a customer in an intensive job search or in a career exploration component while the customer explores and sets a career goal. In these cases as the customer's needs and plans unfurl the ISS must be updated to document what services are actually being provided and an updated estimate of the customers planned end date with the workforce system (aka employment).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Actual Review
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Actual Review: ?
Created: 07/20/2009
Last Reviewed:
Next Review:
Add
Update
Delete
Save
Cancel
Print
Exit
Update
Amend
Delete
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Cancel
Review

CUSTOMER ENROLLMENT POLICY

SERVICE PROVIDER’s employment development effort with customers is based on a Plan Management approach that integrates the delivery of services to customers from intake through assessment, education and training, work competency development, job placement and follow-up. Plan management utilizes the key elements of the services design, assisting the customer design a personal plan for employment and choose services and activities necessary to help achieve his\her employment goals. The process of plan management ensures that all customers receive appropriate job training, educational development, placement and support services in a coordinated efficient and timely manner as outlined in a customers Individual Service Strategy (ISS). This process follows the defined WIA service tier process of Core, Intensive and Training Services described below:

Core Services Enrollments

The enrollment of adult and dislocated worker customers into core services is required at the immediate point in time when it is evident through assessment that the customer will benefit from such defined services. Core services enrollment is for those customers who demonstrate the job specific skills and abilities to obtain re-employment or new employment without additional job specific skill training assistance. Primary core service assistance includes one on one staff assisted help improving interviewing skills, resume development, job search strategies, job club, job referral and basic case management services. Customers enrolled at this level are managed, tracked and evaluated throughout their enrollment until they obtain employment.

Intensive and Training Level Services

For all customers, who through comprehensive assessment need additional staff assistance to obtain employment, a formal Individual Service Strategy must be completed and signed by all parties.

A customer must be enrolled in Intensive level services prior to progressing on to Training level services. Generally customers receiving services at the Intensive level are participating in short-term pre-vocational services such as developing learning skills, communication skills, professional conduct and personal job maintenance skills to prepare individuals for unsubsidized employment or training. Customers may also participate in in-depth assessment, comprehensive job search plan development and maintenance services or case management services leading to full development of an individual training plan leading to employment.

Training level services require the individual complete at least one core and one intensive level service. Customer services at the training level include occupational skills training, on the job training, workplace training and cooperative education programs, private sector training, skill upgrading and retraining, entrepreneurial training, job readiness training, adult education and literacy activities in combination with training and customized training.

To be enrolled in training services, a full ISS must be completed outlining the service strategies, which will assist the customer to employment. The ISS must be completed and a customer enrolled into a training activity within 60 days of his or her assignment to an EMDC Career Advisor.

An ISS must have a planned end date that dedicates the customer and the job-training program to a target completion date. An ISS cannot include a post-secondary educational component that is greater than a two-year degree however an ISS may actually have a start and end date of greater than a two-year period. (Exceptions: occasionally the duration of program services are limited to specific grant award periods as in the case of NEG grants). ISS plans may be extended or shortened due to many external or personal influences. For example, a change in post-secondary institution class schedules changes in career or employment goals, and personal or family financial hardship.

Customer ISS revisions where original employment goals, training and/or support service needs change and those changes affect the financial contributions to the plan, the “revision” should be reviewed by the Career Advisor’s peer or supervisor for approval. The purpose of review is to make sure the customer is actively progressing through and obtaining benefit from his or her ISS. There is no set time limit on extensions to an ISS but discretion should be used to insure that the extensions benefit the customer’s success in completing the ISS and attaining employment.

Career Advisors initiate all new enrollments with a Core B level service status. Subsequent actual and planned enrollment activities would follow consistently with the type of ISS developed with the customer.

New Enrollment Package Requirements

The initial ISS and all subsequent ISS revisions (Please mark ISS as "revised") must be signed by the customer, the Career Advisor and the Career Advisor’s supervisor. The package must include:

- Copy of signed employment/education or credential verification form.
- Copies of all status's that have actual start dates.
- Copy of all approved classroom registrations.
- Copy of all initiated support services and required supportive documents.

Enrollment Time Line

Initial enrollment must be within the 45 days from the first initial interview. Co-enrollment must be within six months from the date of application otherwise a recertification must be completed. It is the Career Advisor’s responsibility to insure compliance.

Career Advisors should be making every effort to review new customer characteristics for final selection and enrollment into IIA or Title E. When” Priority of Selection” is in effect, customers with additional employment challenges such as Basic Skills Deficient, Public Assistance (TANF), Drop Out, Homeless, Disability, Single Parent, or Offender, they may be considered for IIA enrollment. If they are "Dislocated" or laid off from employment according to the WIA "dislocated workers" definition, they may be considered for Dislocated Worker program enrollment. Customers cannot be co-enrolled in WIA Adult and Dislocated Worker programs.

If the Career Advisor completes an enrollment or co-enrollment into any program title, specifically titles A, E, C, or a National Emergency Grant (NEG), he or she <u>must</u> complete an Assessment activity with Reading and Math scores attached to the initial enrollment ISS.

<u>NOTE:</u> Enrollment starts with Job Search or Workshop activities. At least one of these initial activities is required by the State MIS to complete an enrollment.

<u>Co-Enrollment</u>

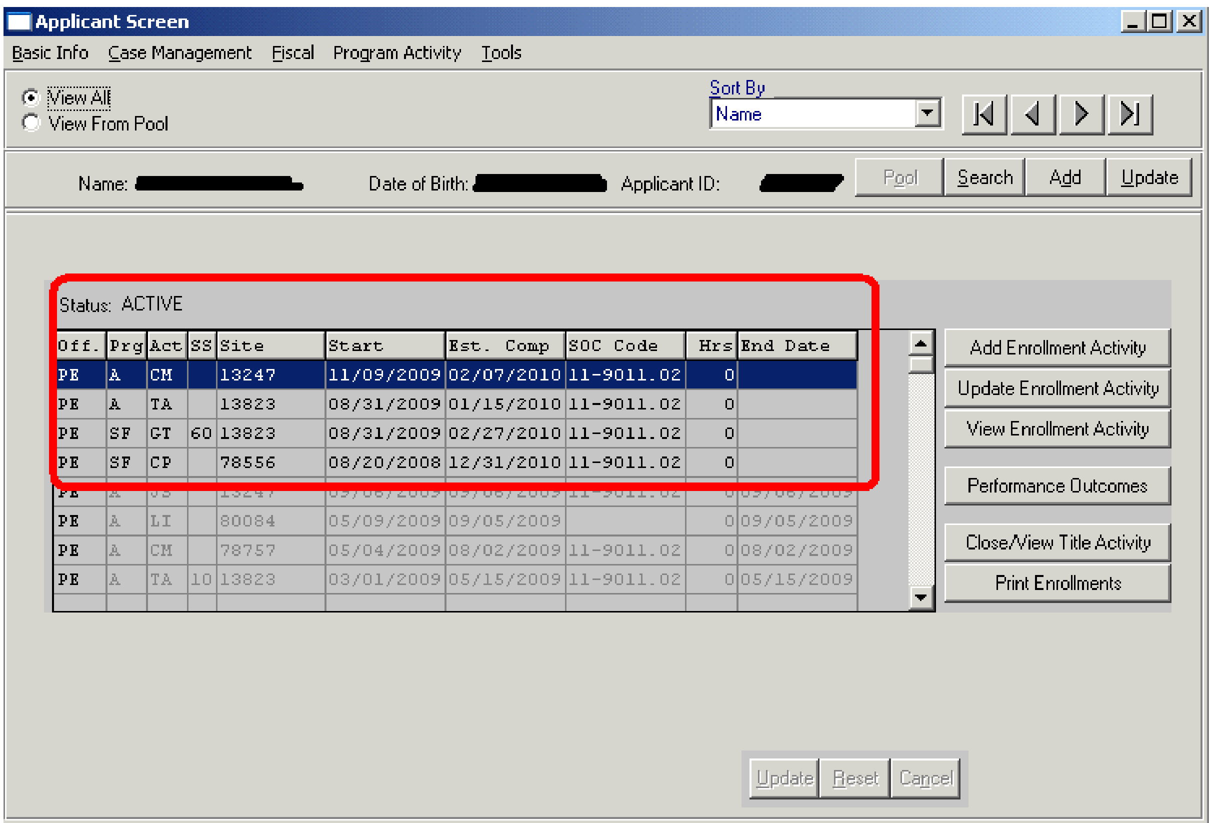
The term co-enrollment refers to a customer being enrolled in more than one program or title at the same time. It is common that a customer be enrolled the Trade Adjustment Act (TAA) or Competitive Skills Scholarship Program (CSSP) and in a WIA. It is also possible that a customer has as need and may be co-enrolled in WIA Youth programs and the WIA adult or dislocated program providing.

<u>NOTE:</u> A customer is not allowed to be enrolled in both WIA Adult and Dislocated Worker at the same time. When a Career Advisor has a customer who is co-enrolled, they write the ISS and assign the Objectives and Actions to a title but then mirror the activities generated from the ISS under that title to the co-enrolled title in the Activities screen in OSOS.

In some cases there may not be a 1 to 1 relationship of activities. For instance, if a customer is enrolled in TAA the training activity in OSOS will be a GT. If that same customer is enrolled in WIA and all the training expenses including supportive services are coming from

TAA then the WIA activity will be GT. If any money, training or supportive service wise is being spent from WIA, then the activity should be TA indicating an Individual Training Account or ITA.

NOTE: On page 291 of the BES Participant Tracking Manual you will find a list of codes used in TAA and CSSP. Following that is the table and definitions of all other codes for WIA. Note, many of the codes are the same as under WIA but both TAA and CSSP have some codes that are exclusive to their individual program.



SELF-INITIATED TRAINING POLICY

This policy outlines the specific elements that constitute a Self-Initiated Training request from an applicant for SERVICE PROVIDER's programs and details the criteria by which those requests are handled.

If an individual has made application for, has been accepted by an approved training institution for enrollment or is currently attending an approved training institution prior to applying for services from SERVICE PROVIDER's program(s), EMDC may decide to assist the individual with the cost of the self-initiated training, including support services under the following conditions:

- There are available openings in the EMDC administered programs the individual is eligible for at the time of application;
- The individual is a member of a targeted group, has documented employment barriers or otherwise qualifies under the priority for selection policy of the program;
- The individual is willing and available to participate in assessment and Individual Service Strategy development activities as deemed necessary by the EMDC in order to establish the need for and scope of services that may be provided;
- The individual does not already possess a four or two-year degree in an occupational area for which there are job openings, or does not possess skills which, without further training, would qualify him or her for employment in the local labor market;
- The training or educational program the individual has been accepted or enrolled in, is in an occupational field that EMDC considers viable for job placement;

- The projected length of the remaining education or training does not exceed the duration limits of the particular EMDC program for which he or she qualifies i.e. maximum of two years of vocational training;
- The individual is in good academic standing within the program; and
- The cost of the training is reasonable and within the parameters of the funding source and the individual has applied for other available financial aid.

All applications from individuals who are pursuing a self-initiated training plan at the time of application to the Career Center will be dealt within accordance with existing application, eligibility verification, review and selection criteria, and time lines established by EMDC and/or the program funding source. No applicant will receive priority processing of his or her application solely on the basis of an impending start date for a self-initiated program.

If the applicant is enrolled in and is currently attending classes or other training activities associated with an educational or training program at the time of WIA application the applicant **is not eligible for assistance to pay for the education or training expenses previously incurred including the costs of tuition, books and supplies, fees, or other training costs.** This policy is based on program guidelines that require that an individual must be determined eligible for services prior to receiving training or support services; that services provided must be based on an Individual Services Strategy (ISS) that establishes the need for and scope of the training and other services to be received by the customer in order to obtain agreed upon employment objectives.

NOTE: All Self-Initiated Training plans must be reviewed and approved by the Deputy Director prior to enrollment in the WIA program.

SERVICE PROVIDER'S ALLOCATION FOR DIRECT OCCUPATIONAL TRAINING, OJT, AND SUPPORTIVE SERVICES COMBINED

Background

Under the Workforce Investment Act (WIA), Title I-B training services for adults and dislocated workers will be provided through Occupational Training, OJT's, and Supportive Services combined. These training funds will be allocated using Individual Training Accounts (ITAs). Youth training activities are not subject to the policy governing the issuance of ITAs.

The intent of this Act is to allow individuals to take an active role in managing their employment future through the use of ITAs. Adults and dislocated workers receiving training under this approach will receive information they need (e.g., skills assessment, labor market conditions and trends, training vendor performance) to make a self-informed choice about their own employment future and the training to support their decision.

The WIA regulations allow the state or local workforce boards to impose limits and requirements on the dollar amount allocated to occupational training, OJT's, fringe costs, work experience and supportive services.

This policy clarifies the expectation that service providers will allocate no less than 30% of their WIA formula funds to direct training and supportive services.

Policy

The goal of the Tri County Workforce Investment Board, Local Area 2 is to expend at least 30% of formula dollars for Direct Occupational Training, OJT and Supportive Services combined. At the beginning of each fiscal year, the Tri County Workforce Investment staff (i.e., TCWIB) negotiates with the local service provider(s) on the targeted direct training and supportive services expenditure goals for the WIA program. This Area has established an expenditure level for direct services of 30%. Service provider(s) submit fiscal reports to the Workforce Board. The Board staff reviews these reports to ensure that expenditures are in alignment with the 30% requirement. From time to time, the Board will review this policy in light of available resources and other exigencies affecting service provision.

FINANCIAL ASSISTANCE FOR TRAINING POLICY

Financial planning is an integral part of the ISS development process and the subsequent success of the customer. Completion of the Service Needs Analysis in the ISS allows the Career Advisor and customer to allocate financial resources to the planned costs of training for the duration of the ISS. This allows the customer and Career Advisor to manage the ISS funding as costs are dedicated and allocated to services. Planned amounts from the Service Needs Analysis are automatically subtracted from the balance for each activity, giving the customer and Career Advisor an accounting of available resources throughout the duration of the ISS. Career Advisors should reference the section of this guide for cost allocating through Class Room Intention Registration/Individual Training Accounts authorizations.

To estimate the costs of individual customer training and support service needs, Career Advisors must first assess the duration and frequency of supports during the enrollment period and secondly the customer family and personal support system - specifically their financial subsistence capability to participate in an ISS. Career Advisors must include the customer's internal and external support systems and resources before calculating SERVICE PROVIDER's financial support contributions.

The intent of relying in part on the customer to make ends meet without undue financial hardship is also to foster and promote continued independence rather than a dependence on a system that may not exist once employed. Career Advisors recognize that wherever possible, customers are provided adequate support using these parameters and decision-making points with customers.

Individual Training Accounts (ITA's)

Individuals may use ITAs in exchange for training services for skills in demand occupations as defined by the LWIB from training providers on the approved list of eligible training providers. WIA mandates that all training services (except for on-the-job training and customized training) be provided through the use of ITAs and that eligible individuals shall receive ITAs through the One-Stop Delivery System. Training must be directly linked to occupations that are in demand in the local area or in another area if the adult or dislocated worker is willing to relocate. EMDC may approve training services for occupations they determine to have a high potential for sustained demand or growth in the local area.

ITAs are not allowed for youth except for those individuals age 18 and above who are eligible for training services under the adult and dislocated worker programs. To the extent possible, in order to enhance youth participant choice, youth participants should be involved in the selection of educational and training activities.

EMDC through the collaborative agreements with local community based training vendors, allows Career Advisors to authorize transactions on behalf of customers to pay for the costs of education and training such as tuition, books, and supplies through an Individual Training Account. The ITA describes the type of services, the cost of services, the amount authorized in the account, and the length of time the ITA is valid. The ITA is activated by the initiation of training activity. The ITA requires the inclusion of other funding resources to help increase its capacity to support training. The ITA is managed through the OSOS and is generated as an integral part of the customers Individual Service Strategy (ISS).

Career Advisors create ITA's only for courses of study, which are outlined, in an approved ISS. Any issues surrounding a course of study should have been addressed in the ISS approval process, so that when training intentions are completed, no questions arise from a customer about the appropriateness of the training or the need for additional approvals in relation to the employment goal or the cost.

Funding Limitations - Training

Because many customers' need for financial assistance for training and education could easily exceed the programs' financial ability this Policy limits the **total** financial value of all training support to a maximum of $3,500 during the first year of a multi-year enrollment in the WIA program and $6,000 over the entire period of a customer's enrollment – unless waived for specific circumstances or programs. Funding availability and limitations will preclude providing every customer with maximum training services. It is the role and responsibility of the EMDC Career Advisor to assist customers in identifying all other sources of support assistance, in addition to this limited funding, to meet basic support needs for the duration of their participation.

NOTE: The WIA Act limits funding for training to individuals who are unable to find other grant assistance for training or whose financial needs exceed the assistance available from other sources. WIA funds are intended to supplement other sources of funding. In fact WIA Service Providers are encouraged to adopt policies that require local Career Centers to leverage resources for sources such as TAA (as appropriate) and Pell to augment ITA investments in training.

NOTE: An individual may select training that costs more than the maximum amount available from WIA or other job training programs when other sources of funding are available to supplement WIA such as Pell Grants, scholarships, severance pay, savings, etc.

Authorization of Expenditures

Career Advisors may authorize the expenditures of funds on behalf of the customer through the initial approval of the ISS and subsequent revisions and approvals. Class room training registrations/ITAs and support services may be authorized by the Career Advisor as long as each individual authorization for training and/or support services is specified in the approved ISS. This places the responsibility on the customer and Career Advisor to thoroughly assess support needs and to be sure that costs for training and support services being authorized are for those, which are specifically, listed in the customer's ISS. To remain consistent with the WIA Program Year all ITA's (and support services) are authorized for periods of time within each program year, July 1, 200_ to June 30, 200_ and must be authorized for each training or support service vendor identified in the customer's ISS.

NOTE: Training or support service expenditures that exceed the approved initial or revised ISS costs or exceed the policy limits of a specific job training program for training or a support service must be reviewed and approved by the Director of Economic and Workforce Development.

Other Mechanisms for Payment

Contracts for services may be used instead of ITAs when the EMDC has requested and received a waiver for one of the following three exceptions:

- When the services provided are on-the-job training (OJT) or customized training;
- When the EMDC determines that there are an insufficient number of eligible providers in the local area to accomplish the purpose of an ITA system. The local plan must describe the process for selection of providers under a contract

for services system. This process must include a public comment period for interested providers of at least 30 days; and

- When the EMDC determines that there is a training program of demonstrated effectiveness offered in the area by a community-based organization (CBO) or another private organization to service special participant populations that face multiple barriers to employment as described in §663.430(b).

The EMDC must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the special participant population to be served. The criteria may include:

- Financial stability of the organization;
- Demonstrated performance in the delivery of services to hard to-serve participant populations through such means as program completion rate; attainment of the skills, certificates, or degrees the program is designed to provide; placement after training in unsubsidized employment; and retention in employment; and
- How the specific program relates to the workforce investment needs identified in the local plan.

CUSTOMER SUPPORT SERVICES AND TRAINING SUPPLIES POLICY

While support services are often important to the success of a customer in a training program, they are not an entitlement but rather are provided on a case-by-case basis as identified through the assessment process. Just as the training services relate to the customer's employment and career goals, support services must relate to that individual's training objectives and *not merely to his or her general needs*.

In practice, support service payments are meant to be short-term measures and as such are limited in both in duration and amount. For example, the duration of a service such as transportation assistance or childcare assistance is limited to the length or period of the enrollment or actual attendance in ISS approved intensive and training activities. These two types of support services may be renewed to coincide with a continuation of the customer's enrollment in training or until training is completed.

General Support Services Policy Guidelines

Supportive services for adults and dislocated workers are defined in WIA sections 101(46) and 134(e) (2) and (3). They include services such as transportation, child-care, health care and medical services, general clothing, relocation assistance, and other support payments. This policy also addresses the provision of specific training and employment services purchased on behalf of customers necessary to enable an individual to participate in activities authorized under WIA Title I. The following general policy guidelines apply to the provision of these services to customers enrolled in WIA programs:

1. The support services described in this policy are designed to assist WIA customers, who are receiving Intensive or Training services, to secure employment and/or ensure retention of employment; or to facilitate participation in employment and training activities funded under the Workforce Investment Act

of 1998 or other job training programs.

2. Supportive services may be in-kind, cash assistance, or services payable through arrangements with other agencies.
3. Supportive services may only be provided to adult and dislocated workers who are: (1) Participating in intensive, training or follow-up services; and (2) Unable to obtain supportive services through other programs providing such services.
4. For each youth customer receiving Support services, the WIA provider must: (1) Provide an objective assessment including review of academic and occupational skill levels; (2) Develop an Individual Service Strategy identifying an appropriate career goal and consideration of the assessment results; and (3) Provide preparation for postsecondary educational opportunities, linkages between academic and occupational learning, preparation for employment, and effective connections to intermediary organizations that provide strong links to the job market and employers.
5. Supportive services may only be provided when they are ***necessary*** to enable individuals to participate in Title I activities. (WIA sec. 101(46).)
6. The provision of accurate information on the availability of supportive services and the referral process through the Career Center is one of the key services made available to adults and dislocated workers and is outlined in the "Tri-County Regional Resource Guide" provided to all WIA applicants.

Support Service Assessment and Planning Process

Career Advisors may authorize supportive service obligations for *enrolled* WIA customers only. Assessment of a customer's need for support services begins with the Intake process where a customer's eligibility for WIA services is determined. Following the Intake process an individual interview conducted with the customer will serve to further document the customer's need for WIA services and assistance, including supportive services. The initial interview includes a more in-depth exploration of the customer's education, work experience/history, vocational interests and preferences, hobbies, special talents, transportation availability, financial subsistence/concerns, employment goals-type of work, hours per week and wage requirements, medical concerns-issues, other training-military, family support system, relocation preferences and personal issues. Throughout the assessment process, the Career Advisor works with each customer to find the most efficient mix of self-help, mutual aid and professional assistance both within the program and in the local community.

Based upon the results of the assessment process, the Career Advisor will develop an estimate of costs of the customer's support service needs. The assessment must take into account the duration and frequency of supports during the enrollment period and the customer's family and personal support system. Documentation of these resources as well as efforts to coordinate services with all other available resources and services within the local area must be documented in the customer's ISS.

Support Services Cost Estimating

To estimate the costs of individual customer support service needs, Career Advisors must first assess the duration and frequency of supports during the enrollment period and secondly the customer family and personal support system. Career Advisors must include the customer's internal and external support systems and resources before calculating SERVICE PROVIDER's financial support contributions. The intent of relying in part on the customer to make ends meet without undue financial hardship is to foster and promote continued independence rather than a dependence on a system that may not exist once employed.

A financial plan is an integral part of the ISS and the subsequent success of the customer. The financial resources of the customer (specifically their financial subsistence capability) to participate in an ISS must also be integrated with actual costs or expenditures to provide services and purchase training over a known time frame. Completion of the "Service Needs Analysis" in the ISS allows the Career Advisor and customer to allocate financial resources to the planned costs of training and support services for the duration of the ISS. This allows the customer and Career Advisor to manage the ISS funding as costs are dedicated and allocated to services. Planned amounts from the Service Needs Analysis are automatically subtracted from the balance for each activity, giving the customer and Career Advisor an accounting of available resources throughout the duration of the ISS.

Funding Limitations - Support Services

Because many customers' need for common support services like travel or child care reimbursement could easily exceed the programs' financial ability this Policy limits the **total** financial value of all support services including Transportation, Child Care, Health Care and Medical Services, General Clothing, Relocation Assistance and Emergency or Other Support provided up to a **maximum of $2,500 over the entire period** of a customer's enrollment. Limits on Training and Employment Related Supplies are capped at **$750** during the period of the customer's enrollment, *unless* covered under an Individual Training Account, On-the Job Training or Customized Training agreement. Funding availability and limitations will preclude providing every customer with maximum services. It is the role and responsibility of the EMDC Career Advisor to assist customers in identifying all other sources of support assistance, in addition to this limited funding, to meet basic support needs for the duration of their participation.

General Support Service Guidelines

The following general guidelines apply to all supportive service obligations:

1. **Assessment of Need:** All support service needs and anticipated expenses must be included in the customer's Individual Service Strategy. Need must be documented in the ISS. Support Services are not an entitlement; they must be supported by need. Need is defined as: "without assistance the customer would not be able to attend ISS activities or would create an undue financial hardship during the enrollment period". Unexpected support service expenses after the initial ISS has been signed must be included in a modification-revision to the ISS and the additional expense must be approved and added to the original support service obligation. Unexpected support service costs must remain within the maximum allocation per participant. The support service plan, (start and end dates), must coincide with the training start and end activity dates.

2. **Authorization:** Completion of the OSOS Support Service Requisition Form, and where necessary, associated supporting documents by the Career Advisor, constitutes the authorization process. All Support Service Requisitions must be forwarded to the Finance Department immediately in order to expedite reimbursement to the customer or to process authorizations for purchase on the customer's behalf. An authorization must be generated in advance of the expenditure of funds for the service. Costs incurred by a customer before the authorization of the service will not be reimbursed by Finance. It is the Career Advisor's responsibility to clearly communicate this restriction to customers.
3. **Requisition Process and Documentation:** All requisitions must include clear instructions regarding the time period of the service; the weekly rates, amounts, and total costs for the service; reimbursement procedures including name and address of vendors or providers of the service; and other required information that is needed to properly process the request. All requests must also include a brief explanation of the basis for the service as it relates to the customer's circumstances. For example: Support services, such as childcare should reference: the number of children being provided for; the number of hours per week per child; the training activity the service is being requested for; and any specific information that relates to the service. In instances where EMDC is providing an ongoing service such as transportation or childcare, the customer is required to obtain the signature of an authorized official from the school or training institution on the voucher to verify attendance for those days for which payment is being requested. These requisitions will be further reviewed by SERVICE PROVIDER's Finance Department to ensure compliance with the Support Service Policy. Unclear or incomplete requisitions will be returned by the Finance Department to the Career Advisor thus possibly delaying the customer's receipt of payments.
4. **Payments:** Payments to customers or vendors will be made by the Finance Department upon receiving a properly completed voucher from the customer and, if required, supporting receipts or invoices from the EMDC or vendor. Vouchers received by the Finance Department that are missing required signatures will not

be reimbursed and will be returned to the Career Advisor. The Career Advisor will be responsible for contacting the customer, correcting the voucher and re-submitting for payment.

5. **Waivers:** Limits specified in the policy with respect to dollar amounts or durations and the types of services allowable are to be used by Career Advisors in determining a support service request. Waivers or exceptions to these may be requested to accommodate extraordinary circumstances. Requests for policy waivers must be in writing or presented to the Director of Economic and Workforce Development for approval. To help streamline and avoid delays in processing, authorizations that exceed policy guidelines submitted to Finance must have the Director of Economic and Workforce Development's signature and date of approval.

<u>Specific Support Service Guidelines</u>

The following types of assistance may be provided to a customer attending approved or agreed upon activities listed in the ISS.

A. Transportation Assistance

1. Payment for transportation by private vehicle will be based on a rate of **$.44** per mile reimbursed up to a maximum of **$20.00 per day**. The number of miles per day authorized for reimbursement must be clearly specified in the Support Service Authorization.
2. Before any transportation assistance by private vehicle is authorized, documentation of the customer's current license, registration and insurance must be verified and a copy of each document placed in his or her file.
3. Payment for transportation is limited to travel within the Service Delivery Area counties or within daily commuting distance, except for travel at the beginning and the end of a training course or for the purpose of a job interview that is more than a daily commuting distance. Payments may be issued to customers to cover the expense of travel to and from training or other activities such as travel to and from job interviews *as specified* in the customer's ISS. Payment for travel outside

the State of Maine is not allowed without the pre-approval of the Director of Economic and Workforce Development.

4. Whenever practical, car-pooling among customers is to be encouraged. A car pool driver who is a customer attending an activity in the same location will be reimbursed **$3.00** per day for each customer transported in addition to the per mile rate. Provisions for payment of car-pooling should be clearly stipulated on the Support Service Requisition Form. Before a car pool arrangement is authorized, the Career Advisor will ensure that the vehicle owner has proof of liability insurance coverage, valid operator license, and vehicle registration.
5. Alternate means of transportation such as public transportation or other nonprofit transportation services, including car-pooling or by procuring rides from non-customers (proof of driver's license, vehicle registration and liability coverage required) may be used by customers. The actual costs of such transportation up to $20.00 per day may be paid. In the case of public transportation; i.e. the City Bus or Public Transportation System; EMDC will provide the customer with bus tickets directly as needed. Payment for other forms of transportation will be reimbursed to the customer upon submittal of a voucher and receipt.

B. Child Care Assistance

Payments may be issued to customers to help cover the expense of child care costs for the time traveling to and from training, time in the classroom or other activities such as travel to and from job interviews as specified in the customer's ISS.

It is the customer's responsibility to seek, choose and maintain adequate childcare services that will enable him or her to undertake training or employment activities. The responsibility of the EMDC Career Advisor includes providing counseling and advice in regard to child care; ensuring that the customer has an adequate child care plan (including back up arrangements); and authorizing child care services including payments to the customer or the provider that adequately cover the unmet need for the duration of the plan. The Career Advisor must verify with the Child Care EMDC the terms of our payment system, if the payment is to be made directly to the provider by SERVICE

PROVIDER. The preferred method of childcare payments is to the customer directly, not to the provider. If EMDC is to make payments directly to the provider of child care or babysitting services where the provider is other than a licensed day care home or child care center, the EMDC Career Advisor must ensure that the provider conforms to the status of "in-home care" or "legal un-licensed family day care" as defined by the Bureau of Social Services. If in-home care or legal un-licensed family day care is utilized, the childcare provider must be at least 18 years of age.

In all cases where EMDC reimburses a customer for child care under this policy the customer and provider will be required to sign the Child Care Policy Statement form stating that the child care provider is capable of providing suitable care for the children involved.

Payments for childcare will be made on the following criteria:

1. Payments may be issued only for those hours a customer is in training or working (employment transition service) plus reasonable travel time to and from the childcare provider's location. In cases where childcare services are provided by a facility that requires payment even for days the children do not attend, the support service can be written to cover those days. This may occur in instances of school vacations or holidays. The support service authorization should clearly state when this is the case.
2. Generally childcare payments will not be made where a non-handicapped member of the customer's household over age of 18 is available to provide the childcare during the hours the customer is engaged in training. Special circumstances need the approval of the Director of Economic and Workforce Development before payment to a family member residing in the customer's household will be made.
3. While there are no daily or weekly caps on child care reimbursement amounts, total plan obligations for child care cannot exceed the per participant allocation for the period the customer is enrolled.
4. Depending on the individual customer circumstances, payment amounts for

childcare may vary. It is recommended that Career Advisors use the following guidelines to help calculate and distribute childcare reimbursement over the course of participation in intensive and training services. The current recommended hourly rate is **$2.80** per hour or **$112.00** per week for full time (40 hours per week) day care. At the Career Advisor's discretion, payment for childcare may be less or more than the recommended hourly rate. However, it is the Career Advisor's responsibility to assure that WIA resources and other childcare services are assembled and adequately dispersed for the duration of the customer's reemployment plan.

5. Payment for childcare may be made either to the customer (the preferred method) or directly to the provider as specified in the Support Services Requisition. In either case the payment will be made by the Finance Department upon receiving a properly completed Child Care Voucher including the signatures of the childcare provider, customer and the training vendor.
6. Childcare costs that exceed the maximum participant allocation must be submitted for the review and approval of the Director of Economic and Workforce Development.

C. Health Care and Medical Services

Payments may be issued to cover the costs of health care services or specific medical services that are necessary to enable the customer to enter or continue in work or training activities or to obtain unsubsidized employment. Payments for this service are to be made on the following basis.

1. Career Advisors must first refer customers to low or no-cost medical/dental services.
2. Payments for health or medical related service are limited to $400 for the duration of the customer's enrollment period.
3. Health care and medical services may include physical exams, dental work, eye exams and glasses, hearing exams and hearing aids, orthopedic shoes, prescription drugs prescribed by a physician to treat a condition which interferes with the

customer's training or employment, or other similar health or medical needs.

4. Where possible requisition for exams (for instance, eye exams) and follow-up services (for instance, glasses) should be submitted separately to make sure that the services are actually necessary and are being procured at the best cost.

D. General Clothing

When a customer enrolled in training demonstrates a need for articles of clothing or other services that are necessary to meet a basic level of appearance or are necessary to ensure proper protection from the elements, such clothing may be purchased on behalf of the customer from support service funds. Clothing may be purchased as follows:

1. Payment for articles of general clothing is limited to $200 during the customer’s enrollment period.
2. The customer must demonstrate a serious need for clothing based on requirements or general expectations of the training program or based on clearly observable appearance deficits related to clothing resources. Clothing purchases made for the purposes of appearance (as opposed to purchases of clothing to protect the customer from the elements) should be limited to those customers who are in an active job search.
3. The least expensive source of appropriate clothing must be used when authorizing a payment for general clothing needs.
4. The Support Service Requisition must itemize the articles of clothing to be purchased, at what cost, from what source. An itemized bill from the vendor must be received prior to payment. Procedures outlined for the purchase of training supplies are to be followed for the purchase of general clothing as well.

E. Relocation Assistance

Payments may be issued to cover the costs for relocation of a customer and dependents to a new residence when relocation is necessary to allow the customer to accept a job offer resulting from his or her participation in training. Payments for relocation may be made on the following basis:

1. Payments may be made only where a customer must move more than 40 miles from his or her place of residence and commuting is not feasible.
2. Payments for relocation are limited to a one-time payment of **$750**.
3. *Actual costs of relocations must be documented with receipts for moving; i.e.,* van rental, security deposits, initial rental, utilities, room and board, etc. Payment will be made to the customer upon submission of documentation.

F. Bonding Assistance

Bonding assistance is provided through the Federal Government and the Maine Employment Security Commission.

G. Emergency or Other Support Services

Payments for service needs that arise out of an emergency situation or that otherwise represent a financial hardship such as auto repairs, auto insurance, auto registration, auto inspection, temporary shelter, or other life or health threatening circumstances or other needs such as legal counseling, family planning and drug counseling, residential support, hair care, etc. may be issued in exceptional cases. Reimbursement for these costs is limited to $500 during the period of the customer's enrollment. <u>These or Other Support Services not referenced in this policy need prior approval by the Director of Economic and Workforce Development.</u>

1. In cases of emergency situations the Career Counselor must document the nature of the emergency and provide third party verification of the situation to justify the authorization of payment. This may include a letter from referral agency, town office, physician, notice of eviction, or other documentation of the need.
2. To request assistance for automobile repairs, auto insurance, auto registration, or auto inspection the Career Counselor must substantiate that the need represents a financial hardship and that the need is of an emergency nature. In addition:

    a. The vehicle must be registered in the customer's name or in the name of the customer's spouse;

b. Repairs are limited to those needed to make the vehicle safe or required to pass State of Maine inspection;

c. Auto Insurance is only for the liability portion of the coverage.

c. Reimbursement of repair costs must be approved by the Career Advisor in advance of the repair. Emergency repairs where the customer cannot contact the Career Advisor for approval may be recommended retroactively at the discretion of the Career Advisor with approval of the Director of Economic and Workforce Development. Whenever possible, approval of repairs should be based on review of at least two (2) estimates. Documentation from the chosen EMDC including their estimate of repair costs, must accompany the Support Service Requisition;

d. Payment for repairs may be made directly to the customer or the EMDC upon submittal of an invoice from the provider; or may be reimbursed to the customer upon submittal of receipt or canceled check.

H. Training and Employment Related Supplies

EMDC may pay for supplies that are *required* by the training program or an employer. The following standards apply to the purchase of training supplies:

1. Training or employer specific supplies may include, but are not limited to, tools and equipment, books and supplies, training or occupational clothing and uniforms, safety materials and other related training supplies. The Career Advisor is responsible for obtaining an exact itemized list of training supply needs *from* the training institution or employer (OJT) with costs. The itemized supply list must be submitted along with the OSOS Support Services Requisition for approval.
2. Cost of training supplies is limited to **$750** *unless* they are covered under a separate training contract agreement such as an Individual Training Registration Intention, On-the-Job Training contract, or Customized training agreement where

the supplies are provided directly by the training institution or the employer and are required. Purchases in excess of this amount require the advance approval of the Director of Economic and Workforce Development and will only be approved if "required" by the approved training institution or the employer as part of an "on-the-job" training program or as a condition of hire.

3. The purchase of occupational tools and equipment may be authorized when they are a ***required*** aspect of meeting minimal worker qualifications for the new job. Under these circumstances, costs may exceed the **$750** allowance per the discretion of the Director of Economic and Workforce Development.
4. If there is no established policy of the training institution or employer as to the purchase of training supplies, those requirements and arrangements for purchase will be mutually established by EMDC with the training institution or employer. In these situations, a written agreement signed by the Director of Economic and Workforce Development and the training institution or employer must accompany the requisition.
5. Training supplies will not be purchased for a customer who already has the same or equivalent supplies or equipment or has access to the use of the same from other sources.
6. A customer may not retain possession of training supplies or required occupational tools and equipment that EMDC has purchased if the customer fails to successfully complete the training or employment program in which he or she is participating. Uniforms, work boots, or other non-reusable or personal items do not have to be returned. The customer must sign the Supply Purchase Policy Statement certifying that he or she understands and will comply with the return policy if he or she fails to complete the program or maintain the job for more than six months.
7. When books are purchased from other than the school or training institution or its designated textbook vendor, a course description indicating the books to be used in the course must accompany the support service request.
8. If the purchase is of books from a training institution not covered by an Individual Classroom Registration Intention agreement, the Career Advisor completes the

Support Services Requisition and authorization letter to the school, employer or vendor specifying the items to be covered by EMDC. This provides the customer the needed documentation to pick up books from the institution prior to a purchase order being executed by the EMDC Finance Department.

9. If the purchase is of other training or employment related tools and supplies (or general clothing), the Career Advisor checks to determine if the proposed vendor will accept a purchase order from EMDC; obtains a precise estimate of items to be purchased with costs; and completes the Support Services Requisition form and submits it for approval. It is important that the approval is obtained before the customer is instructed to pick up the supplies. The Finance Department will issue a Purchase Order for the supplies. This should take no more than five (5) working days. In those cases where the purchase is of an emergency nature, the Career Advisor may contact the Finance Department directly to request assistance to expedite the process. The Career Advisor must contact the Finance Department to obtain a P.O. number to reference in the support service requisition and to expedite the process. The Purchase Order will be sent directly to the vendor and the customer by the Finance Department. Receipt of the P.O. by the customer authorizes them to pick up the supplies; or the P.O. itself can be sent to the Career Advisor upon request who in turn can have the customer take the P.O. to the vendor to pick up the supplies.
10. Customers must sign the Supply Purchase Statement whenever EMDC is paying for books or other training supplies which are returnable should the customer fail to complete the training or retain the new employment position for less than six months. The Career Advisor must verify with the customer the actual receipt of training supplies or required occupational tools and related equipment as listed on the purchase order.

CUSTOMER CERTIFICATES AND CREDENTIALS POLICY

The difference between a certificate and a credential is that certificate is the term being used under “Common Measures” whereas credential is the term used for WIA statutory adult, dislocated and older youth programs. The definition of an acceptable certificate is more restrictive in nature and does not allow for local boards to determine something as a certificate program.

The definition of certificate vs. credential as taken from TEGL 17-05 is as follows:

Certificate – A certificate is awarded in recognition of an individual’s attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills are based on standards developed or endorsed by employers. Certificates awarded by workforce investment boards are not included in this definition. Work readiness certificates are also not included in this definition. A certificate is awarded in recognition of an individual’s attainment of technical or occupational skills by:

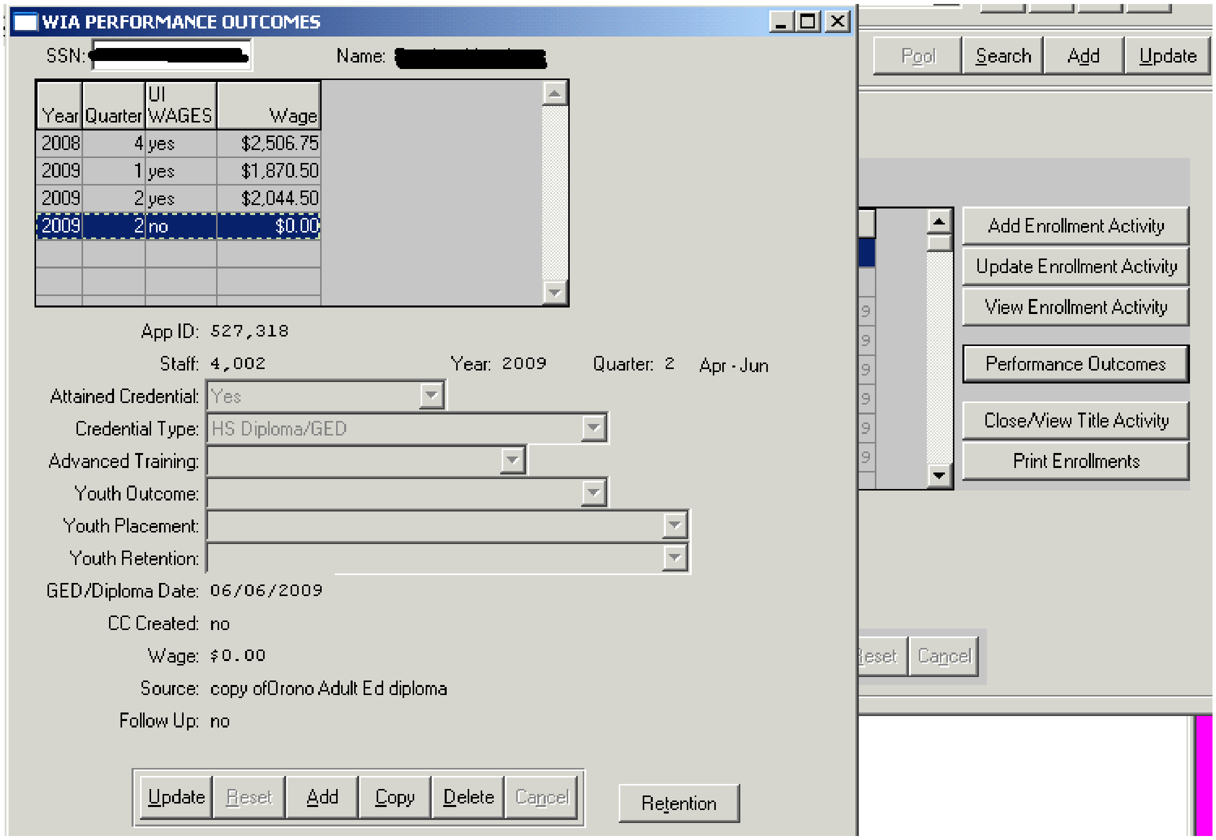
- A state educational agency or a state agency responsible for administering vocational and technical education within a state.
- An institution of higher education described in Section 102 of the Higher Education Act (20 USC 1002) that is qualified to participate in the student financial assistance programs authorized by Title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in federal student financial aid programs.
- A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills, Inc., Machining Level I credential) or a product manufacturer or developer (e.g., Microsoft Certified Database Administrator, Certified Novell Engineer, Sun

Certified Java Programmer) using a valid and reliable assessment of an individual’s knowledge, skills, and abilities.

- A registered apprenticeship program.
- A public regulatory agency, upon an individual’s fulfillment of educational, work experience, or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., FAA aviation mechanic certification, state certified asbestos inspector).
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons.
- Job Corps centers that issue certificates.
- Institutions of higher education which is formally controlled, or has been formally sanctioned, or chartered, by the governing body of an Indian tribe or tribes.

Credential - A nationally recognized degree or certificate or state/locally recognized credential. Credentials include, but are not limited to, a high school diploma, GED, or other recognized equivalents, post-secondary degrees/certificates, recognized skill standards, and licensure or industry-recognized certificates. States should include all state education agency recognized credentials. In addition, states should work with local workforce investment boards to encourage certificates to recognize successful completion of the training services listed above that are designed to equip individuals to enter or re-enter employment, retain employment, or advance into better employment. (Please note: this term applies to the current WIA statutory adult, dislocated worker, and older youth measures only, it does not apply to the common measures).

All youth enrolled in WIA must have an assessed need and that need should lead to a certificate whether it is a High School Diploma, GED or occupational \ vocational certification. If an Adult or Dislocated worker is enrolled in a training activity the Career Advisor must copy the certificate or credential attained upon completion of that customers training, enter it in OSOS in the Performance Outcomes screen and submit the certificate to MIS for filing. See screen shot below.


WIA PERFORMANCE OUTCOMES
SSN: [redacted]
Name: [redacted]
Year Quarter UI WAGES Wage
2008 4 yes $2,506.75
2009 1 yes $1,870.50
2009 2 yes $2,044.50
2009 2 no $0.00
App ID: 527,318
Staff: 4,002
Year: 2009
Quarter: 2
Apr - Jun
Attained Credential: Yes
Credential Type: HS Diploma/GED
Advanced Training:
Youth Outcome:
Youth Placement:
Youth Retention:
GED/Diploma Date: 06/06/2009
CC Created: no
Wage: $0.00
Source: copy ofOrono Adult Ed diploma
Follow Up: no
Update
Reset
Add
Copy
Delete
Cancel
Retention
Pool
Search
Add
Update
Add Enrollment Activity
Update Enrollment Activity
View Enrollment Activity
Performance Outcomes
Close/View Title Activity
Print Enrollments
Cancel

CUSTOMER CONTACT POLICY

All enrolled customers require that Career Advisor record regular contact including in-person, electronic or telephone contact, as well as regular documentation of the customer's current status, program activity, progress and any planned activity.

Customer Contact Points

There are four points of contact that require contact note entries. They are; the initial interview, customer appointments-running records, case note summary and case transfer summary.

Initial Interview: This entry includes a formal discussion of the customer's education, work experience/history, vocational interests and preferences, hobbies, special talents, transportation availability, financial subsistence/concerns, employment goals-type of work, hours per week and wage requirements, medical concerns-issues, other training-military, family support system and personal issues.

Customer Appointments/Contact-Running Record: On going case note entry that reflects the current planned and expected progress of the case and is the preferred method of documenting an accurate accounting of the case.

Case Note Summary: A method by which numerous short-term contacts, considered informal, have occurred with a customer and that allows the Career Advisor to collectively document the status of a case.

Case Transfer Summary: A means by which the current Career Advisor summarizes in detail the recent history of the case, current plan, current progress, special considerations unique to plan management, future plans including training needs, support service needs and projected separation date, the name of the new Career Advisor that the customer was formally transferred to and that the customer was notified of the transfer.

Customer Contact Notes

Contact notes provide a narrative description of the participant's progress, adding details that may not show up elsewhere such as recurring patterns of customer behavior. This is helpful for the current Career Advisor and for any subsequent Career Advisor assigned to that customer; or to assist a substitute to staff effectively handle emergency situations in a Career Advisor's absence. They reflect a running record of the case history to the point where another staff can "pick up" where the last recorder left off. Case notes:

- Reflect responsibility, continuity and accountability to the case and to the management of the customer enrollment.
- Allow staff from different parts of the organization to communicate about the progress of the customer.
- Create a record of activity that may be helpful later in the event of any action that EMDC may need to take on behalf of a customer.

Value of Written Contact Notes: "the ultimate success of a written report is not measured by its structure, readability or correct use of the English language (although definitely important) but in its utility to the user (Esser, 1974).

"Knowing your readers, and what they expect from "a case note," and how they plan to use the information are essential ingredients to communicating effectively" (Miller and Alfano, 1974).

Contact Note Guidelines

Contact notes may be read by virtually any and all staff at SERVICE PROVIDER location, and by the customer. Therefore, certain guidelines in writing contact notes should be followed to protect customer confidentiality and at the same time provide accurate and useful information to the reader, including:

- The Career Advisor should document any substantive interaction with the customer, whether by phone, in person or by mail.
- Each service activity must be documented by a corresponding case note.

- Contact notes should reflect observations of behavior, documented opinions or statements by the customer, what actually happened, not speculation of what-did-not-happen.
- Contact notes may include conclusions drawn from an observation or customer statement, but only if those conclusions are also being shared with the customer, verbally or in writing.
- Include a description of questions, problems, issues that were discussed in the interaction.
- Provide a description of potential services that are being considered currently documented either in the ISS or for possible ISS revision.
- Contact notes should be written using a direct, terse style.
- Use of adjectives to describe situations or behavior and action verbs wherever possible.
- Record the “source” of information. EX “Dr. Tim Fixit said”
- Record the names of people and/or organizations you contact on behalf of your customer.
- Record customer statements in quotation if necessary.
- Contact notes should concentrate on achieving quality not quantity.

Frequency of Customer Contact-Notes

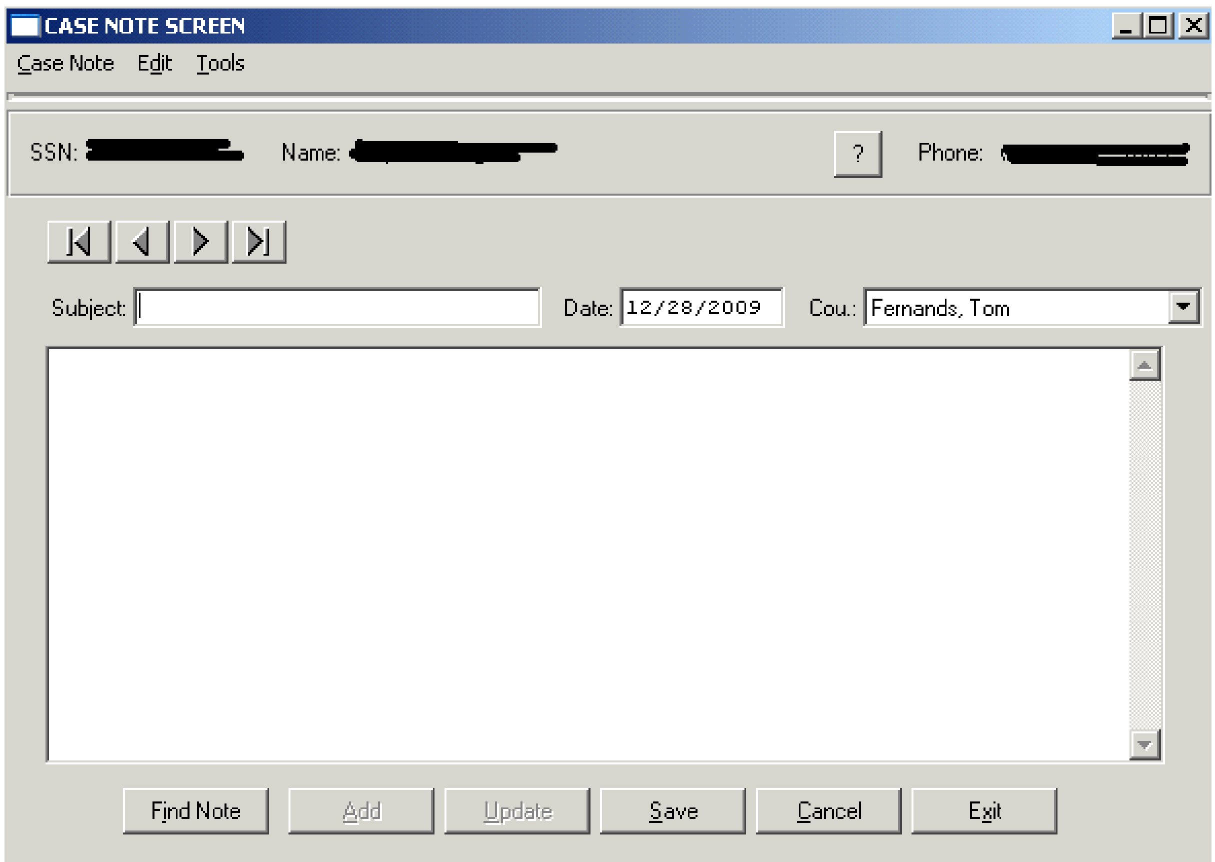
Contact notes should reflect substantive interactions with customers. By the nature of plan management, substantive interactions need to happen often during the early part of a person’s tenure with EMDC (during ISS development, for example), and can be seldom while he or she is successfully attending activities planned in the ISS. However, even when a customer is well established and participating in their ISS activities, a connection with the customer needs to be maintained.

The general guideline for entry of contact notes is that a note should be entered no less than one time a month. The type of contact (phone, note from a customer, in person) is left to the discretion of the Career Advisor. The Career Advisor has the flexibility of not having a face-to-face meeting with a customer every month if no need exists for it.

Frequency is determined by the individual customer need and circumstances.

<u>OSOS Customer Contact Record</u>

To document regular scheduled contact, history of case and current status of customer activity and progress, it is critical that case notes be kept up to date in OSOS. See OSOS screen shot below.



Under the "Caseload management reports" we will look at ways to manage the contact history with a caseload report.

Contact notes are initialed automatically by the OSOS. Verification of the writer's initials in the contact note log should be made by the person entering the notes!

<u>Contact Note Case Record Maintenance</u>

Contact notes should be printed and filed with MIS on a regular basis. At minimum, a copy of all contact notes should be forwarded to MIS upon submitting Separation documentation.

Contact Requirements in Immediate Intervention/Crisis Situations

Situations where a customer is experiencing a crisis such as family health, personal medical emergency or customer conduct related issues, may require immediate intervention and case documentation. In these cases, first contact staff is responsible for contacting the customer's Career Advisor for documentation of the situation and/or to assume control and responsibility for further actions taken on behalf of the customer.

All staff should seek the assistance of their co-workers in these circumstances, resting the handling of each particular circumstance on the collective wisdom of others. In the event of a life threatening emergency intervention with a customer, staff should work in pairs, meeting with the customer to discuss, plan and take appropriate actions.

In all emergency cases where situations pose a danger or threat to the customer, EMDC customers and/or staff or members of the community, the first response staff should dispatch their supervisor and first available staff to assist. Career Advisors and supervisors are responsible for insuring that an accurate accounting of the event is gathered from all involved staff and the situation is documented.

The customer's Career Advisor and immediate office supervisory personnel are responsible for follow-up to the documented situation.

CUSTOMER REFERRAL POLICY

This section pertains to referrals that are made by Career Advisors after customers have been selected into the program.

Broadly speaking, a referral to another source of assistance is in order when it is clear that a successful placement of the customer into an unsubsidized job is virtually impossible and /or when you have realized that EMDC staff does not have the skills or the resources to offer the customer services he or she needs. A successful referral depends on the Career Advisor's understanding of the customer's needs, level of motivation, depth of problem, and the type of problem.

Reasons may include but are not limited to obvious medical issues, disabilities that are more than we can handle, severe personal problems (including substance abuse) that interfere with employability. The need for the referral should be clearly documented both in contact notes and in writing from professionals from whom we have solicited opinions: doctors, social workers, and rehab. etc.

Whenever a customer presents a history that you suspect may affect his or her employability, you should request the customer to sign the medical and other information release forms that EMDC provides. These forms are necessary before any professional EMDC will give opinions or information about the customer's ability to do work.

All proposed referrals that will result in a separation (termination) of the customer from SERVICE PROVIDER's (EMDC) programs should be approved by a case review, and when it has taken place, documented in a contact note. A copy of the referral form should go to the customer's file.

How to Make a Referral

In order to make a referral, it is helpful to have the knowledge of the type and quality of services available in the community. Sometimes we want to help people so much that we act too quickly. We tell the customer to go here or there when we are not sure it is the right place for him or her to go.

Some means of obtaining additional information on community resources include:

- Use of a community directory that lists various service organizations—the function, and their eligibility requirements (one exists in this manual, Career Center Resource Centers have complete community resource directories);
- Contacting people in your own agency and outside your agency to gain information;
- Examining the Yellow Pages in the telephone directory that list agencies and groups from which services are available.

Just knowing of the existence of an agency may not be enough. It is very helpful also to know, personally, someone on the staff with whom you are comfortable talking with, and to whom you can go with specific questions concerning the services they offer. Such contacts may be established by making an informal visit to another agency. If visits to agencies are not possible, then a telephone call or letter explaining your interest—of wanting to obtain more information about another agency—is another initial step in developing contacts.

Agree by phone with a chosen contact to accept the referral. Complete a referral form. Send the referral form with a cover letter and copies of any pertinent documentation to a new provider and copies to the customer. Instruct the customer on his or her responsibilities (phone calls, appointments, etc.)

Who is Involved in the Referral Process?

Three central persons involved in the referral process are:

- The customer.
- The EMDC staff person making the referral.
- The staff person at the agency who is receiving the referral.

<u>The Customer</u>

The customer must first agree that he or she could benefit from additional community-based services or could be better served elsewhere. In addition, he or she should be motivated to work on the issue(s) that resulted in the referral.

Some questions that need to be answered by both the Career Advisor and customer include:

- Has the true problem situation been identified?
- What has the customer done about the problem so far? (Has he or she had this problem before? How did he or she handle it?
- What agencies can possibly help in this situation?
- Have you planned <u>with</u> and <u>not for</u> the customer in considering how to help him or her? Does he or she want to go to the referred agency? Why or why not? Does he or she understand why a referral has been made?
- Should he or she go alone or should you go with him or her? Should you call the agency before the customer goes?

What if the customer refuses to go? (What do you do? What can you do? What if he or she says he or she will go but does not go? What if he or she does go? Is your responsibility to the customer finished?)

- How much follow-up will you do to see that he or she obtained the needed service?

<u>The Service Provider (Career Advisor) Making the Referral</u>

The Career Advisor should consider the following when working with the customer to make an appropriate referral.

- Explaining the function and purpose of the service you represent and how this relates to the customers' needs.
- Giving the information the customer requests, at once or gradually, as indicated.

- Listening, observing, and providing feedback to the customer's comments and questions.
- Clarifying the present situation and obtaining from the customer information related to the problem situation.
- Helping the customer to purposefully express his or her feelings regarding the problem and to deal with them constructively.
- Talking with the customer at a pace commensurate with his or her needs, abilities to comprehend, and willingness to act (listening, waiting, and relaxing as needed.)
- Taking hold of and using information as the customer shows interest and capacity to use help.

Whenever possible we should support the strengths of the customer by providing him or her with information to make the new contact, or by making the first appointment for him or her. This may also involve accompanying the individual in his or her first or initial contact with the new agency depending on the urgency of the referral.

The Worker Representing the Agency to Which the Customer is Referred.

When making referrals or developing new resources, Career Advisors may be involved with a variety of persons such as clergymen, public health nurses, social workers, VISTAs, meal workers, agency administrators, and other health and human service workers. One difficulty that Career Advisors may encounter is being able to make a referral to an agency that will accept the customer when the customer needs or wants help and will provide a service quickly. If the agency either is slow in providing service, or provides it in such a way that the customer is discouraged from continuing, then what can the Career Advisor do?

Some guidelines for evaluating the skills and techniques involved in making a referral include:

- Did you truly understand what problems the customer had and what services he or she needs?
- Were you knowledgeable about community resources?
- Was the method of referral satisfactory to the customer and for the referred agency? Where might your intervention have facilitated the referral process?
- Could you try to find out where there was trouble in the referral? (Did the customer do what he or she needed to do? Did the agency follow through in a responsible way? Did the agency offer the service that the customer requested? Would a telephone contact from you speed up the process for the customer?)
- Were you clear about what you wanted from the agency? What was your attitude toward the agency? Did you fear being refused when asking for help from an agency? Did you have positive feelings about the referral?
- Do you feel confident with your skills in negotiating with other agencies and at bringing appropriate pressure to bear on behalf of the customer?

Separating (Terminating) the Referred Customer

If a customer's participation in EMDC programs is to be ended with the referral, separation should only occur when the referral is successful ie the customer is actively participating with the new agency or the customer has actively decided not to pursue assistance from the agreed upon agency (or any other agency).

CASE TRANSFER POLICY

There are two types of situations that may warrant a transfer of a caseload or specific cases to a different Career Advisor. First, from time to time, a Career Advisor may leave the organization or their job role may change requiring the transfer of an entire caseload. Secondly, a customer or a Career Advisor may request a change in customer or Career Advisor assignment for a variety of reasons, the simplest being a personality conflict that interferes with the working relationship. All efforts should be taken to resolve any relationship conflicts or misunderstandings by the primary Career Advisor and customer.

In all transfer scenarios, the protocol for case reassignments will include the immediate Career Advisors responsible Principal Practitioner, team leader or supervisor to mediate the reassignment and/or the conflict. If a customer asks for a change, we will honor each request after careful review and analysis of the issues.

Frequent requests for change by customers or Career Advisors will require further review and mediation of plan management practice by supervisory personnel.

The parameters for any caseload shift include:

- A customer record on OSOS completely updated (see above) by current Career Advisor.
- Current and new Career Advisor(s) in person review caseload.
- Formal letter from current Career Advisor to customer(s), informing them of the shift and introducing the new Career Advisor.
- Current and new Career Advisors meet with customers in groups.
- Continued interaction of current and new Career Advisor(s) to assure smooth transition.

CUSTOMER CODE OF CONDUCT POLICY

As with every TCWIB and EMDC employee, a customer code of conduct also exists. Each customer is expected to conduct him or herself in a manner that will positively reflect on him or her as a role model to peers, conduct becoming to the workplace and with respect to TCWIB and EMDC staff. Career Advisors as with all TCWIB and EMDC staff, are expected to take personal responsibility as a role model and to insure that questionable customer conduct is addressed immediately. It is the responsibility of Career Advancement Services staff to inform as well as reinforce acceptable conduct.

The following are rules of conduct that apply to all customers:

Attendance: In effort to adequately prepare workers for employment, customers are expected to attend all scheduled activities outlined in their ISS, be on time and fit to participate. It is expected that customers are available for all hours scheduled and to make every effort to attend.

Safety Awareness: Customers are expected to report any conditions or situations that they may feel are unsafe or a danger to themselves or others.

Citizenship: The TCWIB and EMDC expect customers to continue to grow as responsible citizens. Known criminal or dishonest behaviors may jeopardize continued enrollment in programs with EMDC.

Care of EMDC Property: It is the responsibility of every customer to properly use, protect and respect the EMDC property.

Personal Conduct: The TCWIB and EMDC expects all customers to conduct themselves in an acceptable manner while attending any and all TCWIB and EMDC sponsored events or activities and with their communication – both verbal and written. Customers will conduct themselves in a manner that does not harm, threaten or bring discomfort to peers or EMDC staff.

Confidentiality: Customers may expose personal information to other customers or peers that may be confidential in nature. The TCWIB and EMDC requests that all customers respect the confidentiality of others as well as their privacy.

Substance Use: The TCWIB and EMDC will not tolerate the use of, sale of, distribution of or being under the influence of, narcotics, drugs, or other controlled substances, or alcohol while on TCWIB and EMDC property or while attending TCWIB and EMDC sponsored events. EMDC maintains a referral policy, to provide assistance to any customer seeking assistance. Continued enrollment in EMDC sponsored programs may be jeopardized by the above conditions.

Possession of Weapons: The possession of weapons of any kind while on site of any TCWIB and EMDC location or sponsored event is strictly prohibited.

Discrimination: Discrimination or any act of discriminatory behavior on another individual is prohibited

Illegal Harassment: Sexual harassment and other discriminatory harassment are against the law and will not be tolerated. TCWIB and EMDC employees, customers and non-employees who conduct business for and with TCWIB abd EMDC are prohibited from making advances of a sexual nature, requesting sexual favors or engaging in any activity, verbal or nonverbal, that has the effect of, or intent of, sexually demeaning or intimidating the other person, or creating a hostile of offensive environment. It is the policy of the TCWIB and EMDC to provide customers with an environment that is free from all forms of illegal harassment.

Appearance: TCWIB and EMDC expect all customers to be neatly dressed in appropriate work place attire.

CUSTOMER CONFIDENTIALITY POLICY

Career Advisors as well as all employees of EMDC will often deal with confidential customer information. Career Advisors should be especially careful providing customer information to any other person, agency, public or private, who request information in writing or through conversation, including the telephone, about a specific customer without the written permission of the customer. The customer, through written release, should specify the type of information, the purpose of the release of information, and whom the information is being released to. Each request for information requires a new release authorization from the customer unless the initial authorization specifically states that continued release of information to the requesting source is granted by the customer.

CUSTOMER SEPRATION AND FOLLOW-UP POLICY

Separation from job training programs will generally occur consistently with the expiration date of the customer's ISS. There are two distinct types of separations from programs, "positive" and "non-positive." ALL separations are documented and processed via the OSOS Termination Form and submitted to Data Management once the reason(s) for separation is verified.

Placement Separation Guidelines

To report and process a PLACEMENT (a.k.a. positive separation)—Career Advisors will first make an effort to verify the information contained on the Employment Verification Form either from the customer or directly from the employer. The separation date of an EE should be the date when the decision is made to terminate services to the customer, which ideally is as close to the actual date of placement as possible. In any case, once the decision is made, do not delay in submitting the paperwork. When you first learn that a customer has obtained a job, try to get all the information requested on the form from the customer. If possible confirm the information directly from the employer as well. Verify information we already have rather than ask the employer to disclose sensitive information to us. Remember that the employment verification form customer authorization-release portion is filled out and signed by the customer during prior to enrollment into the job-training program.

Career Advisors will initiate the actual "Placement" separation on the OSOS and submit it to MIS once the employment data has been verified.

NOTE: The only positive separations are still placements, those adults with employment or youth with enhancements. For WIA IIA and Title III there are no positive separations for enhancements or stepping-stones (like obtaining a GED or graduating from high school) for adults like there are for youth.

Younger Youth Skill Attainment (14 to 18 years old) – There are three skill attainment categories for younger youth, Basic Skills, Work Readiness Skills and Occupational Skills. (See Part 664 of Federal Register for additional detail).

Non-Placement Separations Guidelines

For NON-PLACEMENT SEPARATIONS Career Advisors complete the top section of the Termination Form only, remembering to sign or initial the record. The form then goes to Data Management, which uses the information to report back to the State.

NOTE: All non-placement separations must be reviewed and approved by the Deputy Director prior to submission to Data Management.

Please see Guidelines, below, for discussion on taking "non-placement separations."

Before a non-placement separation is taken, there has to be genuine effort to communicate with the customer about his or her desire to continue with the program. When the Career Advisor believes the customer is no longer interested in EMDC services, for whatever reasons (i.e. external information—customer has moved, dropped out of school, or has just dropped out of sight) follow these guidelines:

- Spend at least 30 days trying to reach the customer.
- Attempt three contacts by phone (including tries in the evening) or by a first class letter asking them to make contact—welcome back home letter.
- Send a certified letter, giving 10 business-day notice of pending separation from the program.
- A customer may be placed in HOLD or INACTIVE status on OSOS while efforts to reach him or her are underway.
- Any time you discover a change in address and/or phone number, please update the customer record in the OSOS.

Non-placement separations may also be for other reasons, such as lack of effort on the part of the customer, medical issues, long-term family care responsibilities, institutionalization, death, , or realization that EMDC simply cannot meet the needs of the particular customer. All these reasons must be clearly documented in case notes.

Definitions and Other Separation Information

Source: State Administrative Manual

Separation

The separation of a customer who is no longer receiving employment, training, or services (except post-separation services) funded under a given title of the Act.

NOTE: Individuals may continue to be considered as customers for a period of 90 days after last receipt of employment or training funded under a given title. If after 90 days no valid service has been provided – or the customer is not in a hold status for a valid reason – the customer will be automatically exited from the program. Thus, it is critical that Career Advisors maintain active services in the system at all times up to the point of separation.

Temporary Employment

Temporary employment comes into play for customers who are active in training programs but find it a financial necessity to work part-time to remain active in the job-training program. This is defined as "Employment for the purpose of income maintenance prior to, and/or during participation in a training program with the intention of ending such temporary employment at the completion of the training and entry into permanent unsubsidized employment as a result of the training". Such temporary employment must be with an employer other than for whom the individual was previously employed. This provision applies to eligible individuals both prior to and subsequent to enrollment. Individuals who return to the previous employer may be classified under recall (Title III Only). This may affect eligibility to continue in the job-training program. (See recall definition).

Remember – If a customer obtains employment he or she does not necessarily need to be separated from the program if "the ISS has planned for future training and the job is clearly to support him/herself while in school."

Temporary Full Time Employment

In some instances, customers for purposes of subsistence will acquire work on a full-time basis and that work extends into long term employment. In these cases, employment may interfere with the customer's ability to participate in job training activities. Individual cases should be presented to the case review team for direction regarding managing enrollment and separation decisions.

Recall

In the event an enrolled customer is recalled to work with the former employer and accepts employment, employment and training related services end and the customer are separated from the program. If the employee becomes unemployed, they are required to reapply for job training services.

Unsubsidized Employment or "Positive Term for Employment"

The category for customers who, at separation, entered full or part-time unsubsidized employment not financed from funds provided under the Act, and includes, for WIA reporting purposes, entry into the Armed Forces of the U. S., including entry onto active duty from reserve and National Guard units due to Operation Desert Shield/Storm, effective 8/2/90, entry into employment in a registered apprenticeship program and customers who become self-employed. In addition to the federal reporting requirements, placements must be for 20 or more hours per week to have a positive impact on program performance.

The timeliness of submitting entered employment (EE) separation information for any customer is critical for purposes of follow-up. The separation date of an EE should be the date when the decision is made to end services to the customer, which ideally is as close to the actual date of placement as possible.

NOTE: When a customer is separated as employed and verification is obtained from the employer, what is being documented is "yes, this customer was hired by my company."

Program Exit Codes: (See definitions from the State Manual for each code)

Use this listing as a reference guide. Many of the available separation codes have several detailed stipulations. Please take the time to read the definitions and to tuck the knowledge that they exist in your mind to be referenced when necessary.

Separation and Follow-Up Notification

Once a customer has been separated from the program he/she will be sent a letter by Data Management, to the most recently updated mailing address, with information regarding the reason(s) for the separation and to notify the customer of the program follow-up services and contact plans. A copy of this letter will be kept in the customer's file.

Post-Program Follow-Up Services

WIA allows that separated customers may receive follow-up services for a period of up to one year after separation if assistance is needed for the customer to retain his or her job. For adults and dislocated workers these services are the same services identified as Core Services. Follow-up services for youth may include: leadership development and supportive services; regular contact with the youth's employer to address any work-related problems; assistance in securing better job, career development or further education; mentoring; etc..

TCWIB ON-THE-JOB TRAINING POLICY

On-the-Job Training may be a more appropriate training option for the customer who financially must return to work and demonstrates the interests and ability to learn new job skills in a hands-on fashion. Initially, OJT planning requires significant interaction by the Career Advisor, the customer and the target employer to research the needed job skills, abilities and knowledge relevant to a particular job. This research is critical to determine the potential to use OJT as a job skill development option. The information gathered through this research allows the Career Advisor to compare the customers existing work skills with those required by a specific employer, to establish the expected Specific Vocational Preparation (SVP) time required to learn the job skills. Based upon this preliminary research the Career Advisor will propose the job and on-the-job training details to the Deputy Director for initial approval to continue with OJT contract development and to finalize the ISS and draft the contract (See attached OJT contract form).

EMDC only sponsors OJT agreements with employers who are willing and able to provide the necessary supervision and skill development opportunity to the customer and, who guarantee to employ the customer upon the completion of the contract period. Cost estimating the OJT contract requires investigation and documentation of the Specific Vocational Preparation (SVP) time according to the Department of Labor. This, in alignment with the starting wage of the occupation, the number of hours per week, and the individual customer's skill's gap will dictate the length and cost of the OJT and contract. OJT's should not exceed a maximum of six months.

Once the OJT contract is approved and signed by the EMDC Deputy Director, the Finance Department will establish an OJT account number and provide the employer a copy of the contract which outlines the terms of the agreement, the reimbursement process and monitoring requirements.

General OJT Guidelines

On-the-Job Training (OJT) may be provided to WIA-eligible unemployed workers and to incumbent workers. WIA-eligible individuals are enrolled in OJT as appropriately based on their individual employment plans. An individual who is fully skilled in an occupation shall not be placed in an OJT in that occupation. Such training may be approved only if EMDC determines that:

- No currently employed individual is displaced by such eligible worker, including partial displacement such as a reduction in the hours of non-overtime work, wages, or employment benefits;
- Such training does not impair existing contracts for services or collective bargaining agreements;
- In the case of training that would be inconsistent with the terms of a collective bargaining agreement, written concurrence has been obtained from the concerned labor organization.
- No other individual is on layoff from the same or any substantially equivalent job for which such eligible worker is being trained;
- The employer has not terminated the employment of any regular employee or otherwise reduced the work force with the intention of filling the vacancy so created by hiring the eligible worker;
- The job for which the eligible worker is being trained is not being created in a promotional line that will infringe in any way upon the promotional opportunities of currently employed individuals;
- Such training is not for the same occupation from which the worker was separated and with respect to which such worker's group was certified pursuant to section 222 of the Trade Act of 1974;
- The employer certifies to EMDC that the employer will continue to employ the eligible worker for at least 26 weeks after completing the training if the worker desires to continue such employment and the employer does not have due cause to terminate such employment;
- The employer has not received payment for any other OJT training provided by such employer which failed to meet the requirements of paragraphs a through f of this section or such other Federal law; and
- The employer has not taken, at any time, any action that violated the terms of any certification described in paragraph i of this section made by the employer with respect to any other on-the-job training provided by the employer for which the

employer has received a payment.

Incumbent workers

OJT contracts may be written for employed workers when the employee is not earning a self-sufficient wage as determined by TCWIB policy, the requirements of this document are met, and the OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the TCWIB.

Employer Guidelines

Providers of OJT are not subject to the requirements for Eligible Training Providers found in WIA sec.122 (a) through (e). However, EMDC is responsible for collecting performance information from OJT providers as the Governor may require (WIA sec.122 (h)). Key considerations, among other requirements include:

- Contracts must not be written with employers who have previously exhibited a pattern of failing to provide OJT participants with continued long-term employment with wages, benefits and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work.

- An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. EMDC will not write an OJT contract for less than four (4) weeks or to exceed twenty-six (26) weeks.

- Contracts cannot be written for occupations with an SVP of 2 or lower, or for occupations that pay less than 150% of the applicable minimum wage unless the limitations of the individual trainee makes such training reasonable and appropriate, and these limitations are documented in the individual's ISS.

Consideration should be given to information from the employer; the Specific Vocational Preparation (SVP) information found on O*NET on the Snapshot screen for each occupation, including skill requirements of the occupation; the academic and occupational skill level of the participant; prior work experience and the participant's individual employment plan.

Employer Payments

OJT payments to employers are deemed to be compensation for the extraordinary costs associated with training participants, additional supervision related to the training and the costs associated with the lower productivity of the participants, although employers are not required to document such extraordinary costs.

TCWIB established guidelines for negotiating the reimbursement rate, limits reimbursement up to 50% of the wage rate of an OJT participant. Funds provided to employers for OJT must not be used to directly or indirectly assist, promote or deter union organizing.

Contracts

Service Providers are encouraged to develop OJT contracts that specify the occupation(s) for which training is to be provided, the duration, the number of participants to be trained in each occupation, wage rates, reimbursement rate, maximum amount of reimbursement, a job description or training outline of what the participant will learn, and any other separate classroom training that may be provided. The contract needs to have a provision that the employer will maintain and make available time and attendance, payroll and other records to support amounts reimbursed under OJT contracts. Costs for classroom or other additional training may be included in the OJT contract in addition to wage reimbursement if the classroom training is related to the occupation and necessary for adequate performance of the occupation.

Periodic monitoring of OJT jobsites will be conducted by SERVICE PROVIDER's Quality Assurance Specialist
in order to ensure the validity and propriety of amounts claimed for reimbursement and that training is being provided as specified in the contract.

Labor Standards

Training provided must be in accordance with WIA sec. 667.270 for non-displacement assurances, WIA sec.667.272 for wage and labor standards, WIA sec.667.274 (a) and (b)(1) for health and safety standards, and WIA sec.667.275 for nondiscrimination and equal opportunity assurances. Participants must receive the same benefits and have the same working conditions as similarly employed workers.