GREEN COUNTRY WORKFORCE
DEVELOPMENT BOARD
14002 E. 21st St.
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Tulsa, OK 74134

Workforce Innovation and Opportunity Act

Adult and Dislocated Worker Programs Policy

Chair, Green Country Workforce Development Board

7-26-23
Date

No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I-financially assisted program or activity.

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Equal Opportunity Employer/Program. Auxiliary aids and services are available upon request for individuals with disabilities.

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I. Purpose

Green Country Workforce Development Board (GCWDB) provides this guidance to Green Country Workforce Development Area (GCWDA) system partners on the implementation requirements for the WIOA Title I Adult and Dislocated Worker (DLW) programs. This policy establishes GCWDB standards for the implementation, design and parameters of the WIOA Title I Adult and DLW. This policy is established in accordance with applicable state and Federal laws and regulations.

II. Effective Date

GCWDB BD Approved and effective 07.26.2023

NOTE: All GCWDB Policies and attachments are available for download at:

https://www.greencountryworks.org/resources/policy-research-best-practices/

III. Policy

WIOA provides for a workforce system that is customer centered and accessible to all job seekers, and training that is job-driven. Oklahoma's workforce system delivers career and training services in the Oklahoma Works American Job Centers (AJCs) across the state. The Adult, DLW, and ES programs provide training and employment services in the AJCs and are required programs by law. Under WIOA, partner programs and entities that are jointly responsible for workforce and economic development, educational, and other human resource programs, collaborate to create a seamless customer-focused AJC network that integrates service delivery across all programs to make it easier for individuals to access the services they need to obtain skills and employment.

Funding

WIOA is a Federal program and WIOA funds may not, in any way, shape, form or fashion, be expended onthe cannabis industry.

Braiding funds is a high priority under WIOA and occurs when different funding streams are used together to support different needs for the same customer. It allows a program to provide more comprehensive services to participants while maximizing partner resources available to assist individuals. For example: The Title I WIOA Adult program and the WIOA Title II Adult education program can provide complementary services to an individual and can be used together or "braided" to serve a participant. When used together, these two funding sources can increase the capacity of programs to help participants meet their employment and educational goals.

Forty Percent (40%) Training Goal

Oklahoma set a benchmark in PY17 that requires each local workforce development board to expend no less than 40% of their Adult and DLW funds on training that leads to a recognized postsecondary education and/ or workforce credential directly linked to an in-demand industry or occupation. The requirement remains part of an ongoing effort to address the skills gap, i.e., the number of people trained and educated versus the number of jobs that are open, which was identified as one of the biggest challenges facing the State. The requirement is for all local workforce development areas (LWDA) to expend a minimum of 40% of their formula-allocated Adult and DLW expenditures in a program year (excluding administrative costs) on allowable training costs. Guidance is provided on the allowable costs and calculations for meeting the required 40% minimum training expenditure rate. The definition of Other Costs Directly Related to Training has been expanded to include additional supportive services that may be necessary to help ensure successful training completion. And the requirement to deduct the cost of incomplete training already paid by WIOA Adult and DLW formula funds has been removed.

Allowable Training Expenditure Costs

Allowable costs used to calculate compliance with the 40% minimum training expenditure rate must be of direct benefit to the participant, and may include:

- Training Services as defined in WIOA section 134(c)(3)(D):
  - Occupational skills training, including training for nontraditional employment.
  - On-the-job training.
  - Incumbent worker training in accordance with WIOA section 134(d)(4).
  - Programs that combine workplace training with related instruction, which may include cooperative education programs.
  - Training programs operated by the private sector.
  - Skill upgrading and retraining.
  - Entrepreneurial training.
  - Transitional jobs in accordance with WIOA section (d)(5).
  - Work experience (WEX), internships, and job shadowing.
  - Work based learning combined with related instruction, including apprenticeships.
  - Job readiness training provided in combination with any of the services in (a)-(i).
  - Adult education and literacy activities provided concurrently or in combination with any of the services in (a)-(g) and (i).
  - Tutoring, when necessary to ensure the successful completion of a class or course of study within an approved training program.
  - Prerequisite training, such as costs associated with ITA-funded zero-level or remedial courses that prepare students for college level classes.
  - Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.
- Other Costs Directly Related to Training, which may include:
  - Books, fees, school supplies, and other items necessary for students enrolled in postsecondary classes;
  - Payments and fees for employment and training related applications, tests, and certifications;
  - Uniforms, tools, equipment, and other items required for training;
  - Assistive devices for individuals with disabilities that are necessary to ensure individuals are able to participate in and complete training or licensure requirements;
  - Transportation costs to and from the training site, including reasonable repairs to the participant's vehicle, as set by local supportive services policy;
  - Costs for childcare and dependent care while participating in training activities, including reasonable travel time to and from the training facility; and,
  - Payments and fees for employment and training related applications, tests, and Certifications, including assessments required by the training facility for acceptance into training and assessments or exams for licensures (e.g., the NCLEX exam, CNA exam, etc.).

Local areas are no longer required to deduct the cost of incomplete or unfinished training from the amount expended on training. However, every reasonable effort must be made to ensure program completion, including the provision of comprehensive career planning services prior to the individual's enrollment in training. WIOA section 134(c)(3) requires an interview, evaluation, or assessment and career planning services to determine if an individual has the skills and qualifications to successfully participate in the selected training program. These tools and services must be utilized to help the individual make an informed career choice and to help the case manager make an informed decision as to the individual's likelihood of training completion and successful attainment of employment. The right combination of individualized career services, such as a comprehensive assessment and an in-depth interview, better prepares the case manager to make a decision as to the individual's readiness for training, including whether there are barriers that must be addressed prior to entering training.

Costs Not Allowed Toward 40% Calculation

Although the cost of training must be coordinated to the extent possible with other sources of assistance, leveraged funds must not be included in the 40% training rate calculation. This includes funds and services available through other workforce partners and other grant assistance, such as State-funded training funds or Federal Pell Grants. Additionally, the following costs may not be included when calculating the local Training Expenditure Rate:

- Costs associated with workforce staff time, materials, supplies, or overhead
- Needs related payments
- Rent or mortgage payments
- Utility bills
- Initial assessments of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities (including skills gaps), and supportive service needs
- Incentives (for example, gift cards for completing milestones or training).

Calculation of Expenditure Rate

The 40% training expenditure rate is calculated separately for Adult formula funds and DLW formula funds. The following formulas determine whether the LWDA is expending 40% of their allocated Adult program dollars on training, and whether 40% of allocated DLW are expended on training. The total qualifying expenditures from each program must be divided by the respective WIOA program's allocation, minus a maximum of 10% local administrative cost.

Adult Program Training Expenditure Calculation

$$\text{Yearly Adult Training Expenditure Rate} = \frac{\text{Total Qualifying Training Expenditures from the WIOA Adult Allocation}}{\text{WIOA Adult Allocation minus Local Administrative Cost (Capped at 10\% of Adult Allocation)}}$$

Dislocated Worker Program Training Expenditure Calculation

$$\text{Yearly DLW Training Expenditure Rate} = \frac{\text{Total Qualifying Training Expenditures from the WIOA DLW Allocation}}{\text{WIOA DLW Allocation minus Local Administrative Cost (Capped at 10\% of DLW Allocation)}}$$

Local 40% training expenditures must be reported quarterly via the State-issued 9130 Form. GCWDB will monitor, on a quarterly basis, the 40% training expenditure requirement.

Enforcement of the Required Expenditure Rate

OOWD (Office of Workforce Development) will provide ongoing technical assistance as needed to all local areas to support implementation and achievement of the 40% minimum training expenditure rate.

1. After one year of non-compliance with the 40% minimum training expenditure rate, the LWDA must submit to OOWD an action plan with achievable strategies and a realistic timeline that will ensure that the LWDA meets the expenditure rate in the following program year. A successful action plan typically consists of the following elements, at a minimum:

a. The total training expenditure level for the non-compliant program (or programs) for the first year a minimum 40% rate was not attained.
b. A detailed plan to meet the 40% minimum training requirement for the current program year.
c. Strategies for leveraging resources from training and supportive services.
d. Define processes and forms that will be used to monitor and track training and supportive service expenditures.
e. List any technical assistance needs that must be addressed to meet the 40% minimum training expenditure requirement.

2. After two consecutive years of non-compliance, the Governor will mandate the minimum expenditure to be addressed as a component of the WIOA local plan.
3. Failure to comply with this policy for 3 consecutive years may result in the State recapturing and reallocating a percentage of the LWDA's Adult and DLW funds and/or development of a reorganization plan through which the Governor would appoint and certify a new local board.

Case Management

Case management is defined as the coordination of services on behalf of the participant, including services provided by an AJC partner or a community-based organization. Appropriate documentation of case management activities is essential to ensure provision of the comprehensive services necessary to achieve the participant's career objectives. The comprehensive services and activities necessary for attainment and retention of successful employment must be described in the IEP (Individual Employment Plan). At any point, an applicant or participant discloses a barrier or if a barrier is observed during the ongoing assessment of and case management for an individual, appropriate accommodations, services, or referrals to services must be made. Any issue must be followed up clarifying if the issue was resolved, if the participant received a service, if the issue has worsened, etc. If a problem remains or worsens, the case manager must identify a plan of action for resolution. The use of funds from other sources for career or training services does not negate the responsibility of WIOA staff to maintain and document contact with participants enrolled in Adult or DLW Programs. The purpose of regular contact is to offer services, verify training progress, and ensure performance measures are attained, even when the cost of training is paid by another entity or program, such as a Tribal entity, Trade Adjustment Assistance (TAA), Temporary Assistance for Needy Families (TANF), Department of Rehabilitation Services (DRS), Adult Basic Education (ABE) providers, non-profit entities, or other community partners. At any point there is a gap in service, it must be noted in case notes and recorded in "Schedule a Service Gap" in the virtual case management system. Case management involves regular contact with a participant which, at a minimum, must be conducted every thirty (30) days with every sixty (60) days being face to face. Contact with a participant for case management purposes is not considered a program service and will not prevent program exit.

LWDBs must address in their policies timelines for contacting participants in training programs, including participants whose training is coordinated with or funded by partner entities. GCWDB requires contact with any participant who is in training over 30 days at least every 30 days for case management. Procedures for more frequent contact for individuals enrolled in short-term training programs must also be included in local policies. This is particularly important for those in short-term training programs that are scheduled for completion in 30 days or less to help participants address any challenges they face during the short-term training. GCWDB requires contact with any participant attending short-term training at least 3 times during the training, and the minimum three case management contacts during the training must take place at the beginning, middle, and end of training.

Joint Staffing

Joint Staffing is a process that would be utilized to ensure wraparound services are provided with the focus on the participants with serious or complex needs. Wraparound services involve a comprehensive array of individualized integrated services and support networks "around" a participant, rather than forcing them to enroll in pre-determined inflexible programs that do not meet their individualized needs. Joint Staffing with wraparound services makes it more likely for a participant to be successful for all programs and everyone involved is working towards the same goals.

This process is an intensive and individualized case management process that will address all needs of the client through the community partners. Joint Staffing involves partners collaborating at one meeting with the participant to discuss the needs, barriers, and services to complete one plan for a multitude of programs. Meeting Frequency is determined by participant's progress and the ability to complete program goals. In most cases, at this meeting one specific agency is designated the lead agency in coordinating the wraparound effort. This type of meeting allows for all the participants' needs to be met without duplication of services among the partners and one unified plan to be developed. Assessments and resources can be shared among partners. This is also referred to as "wraparound" services. This will increase the attainment of goals ensuring participants success.

Reasonable Accommodations

Including accommodations available at the GCWDB website, GCWDB policies, and CASAS (Comprehensive Adult Student Assessment System, GCWDB's chosen NRS approved EFL assessment), GCWDA strives to accommodate all individuals. To this end, GCWDA Oklahoma Works AJCs are equipped with accessibility kits. GCWDA Oklahoma Works AJC staff are expected to orientate themselves with the contents of the bag and request technical assistance from the GCWDA One-Stop Operator (OSO) on any items. Center managers may also request an orientation session on these kits from the OSO. GCWDA Oklahoma Works AJCs strive for 100% accessibility. Comprehensive and affiliate centers are reviewed yearly during center certification and/or access for all assessments. Additional accessibility information is provided in the Vital Service and Information Notice (Attachment ZZ). Under Section 188 of WIOA and related regulations, providers must provide reasonable accommodations to qualified individuals with disabilities, unless providing the accommodation would cause undue hardship. No qualified individual with a disability may be excluded from participation in or be denied the benefits of a service, program, or activity or be subjected to discrimination because facilities are inaccessible or unusable by said individual.

Virtual Case Management System

GCWDA does not keep paper files. Any and all case information must be entered, uploaded, noted, and otherwise appropriately documented in Oklahoma's State approved and mandated case management system, the virtual case management system. If any event is not properly recorded and documented, that event is considered as not occurred.

Case Notes

Case notes, referred to as both Client Notes (pre-enrollment) and Program Notes (post-enrollment) in the virtual case management system, must be entered each time contact is made or attempted with a client and any time action is taken on a client's behalf. Case notes must provide detailed information on participant information related to eligibility, the need for WIOA services, coordination of services, resources, all case management activities, and updates that have not been included in the IEP must be documented in detail, including:

- The participant's employment status at program enrollment, including:
  - Details pertaining to the participant's current or most recent employment, including the name of the employer and employment end date, if appropriate, and
  - For participants who were laid off, the name of the company from which they were laid off and the date of the layoff.
- Contacts with participants, including the purpose and outcome of the successful contact.
- Attempts to contact the participant, in accordance with local policy, and the result of the attempted contact.
- The attainment of employment, including:

  - Employer name,
  - Date employment started,
  - Wage at hire,
  - Benefits such as insurance and leave,
  - How employment information was verified (pay stubs, employer contact, etc.),
- All other activities and information pertinent to the achievement objectives in the IEP; and
- Details regarding coordination of services and resources.

Detailed case notes are an important aspect of case management because they tell the story of an individual and help maintain continuity of services at every stage of service provision (i.e., application, eligibility determination, enrollment, identified services and needs, services provided, referrals made, and status of participation at any given point through follow-up to exit). Monitors or other authorized personnel should be able to read case notes and ascertain where an individual is in the GCWDB WIOA process, what the relevant needs are and how needs are being addressed. Case notes describe an individual's application to and participation in WIOA programs, providing eligibility information, tracking progress and setbacks in the achievement of stated objectives, providing facts pertinent to an individual's training and employment, detailing service needs, provision and referrals, and detailing outcomes. Information contained in case notes should be relevant to the eligibility, enrollment, needs, services, education and employment goals of the individual. Service provider staff must maintain a written record of communication with participants from the date of application to exit through follow-up.

Case managers are required to enter case notes at every interaction, point of contact or attempted contact with an individual, every contact or action on behalf of an individual, when the participant receives a service, has a service status update or outcome, or makes contact with a case manager. Point of contact includes all correspondence with the participant, including email, phone call, text, letter, private message, verbal, written messages, and mail-outs to the individual. Case notes should be entered timely following the event or contact. Case notes may be grouped together when services are sequential and/or provided on the same day. If more than one service is provided on the same day, each service must:

- Be distinguishable by type and/or title of service (e.g., Eligibility, IEP, ITA, and etc.),
- Provide complete description of each service, and
- Correlate with uploaded and recorded documentation on the same day.

Case notes should <u>NOT</u> include any Health Insurance Portability and Accountability Act (HIPAA) protected information.

On December 6th, 2018, the U. S. Department of Labor, Employment and Training Administration, Division of Workforce Investments, Region IV provided advice of the STAR method for case noting. The STAR case note method consists of: S – Situation, background, set the scene; T – Task or Target, specifics of what is required, when, where, who; A – Action, what you did, skills used, behaviors, characteristics; R – Result, outcome, what happened. This method is recommended to include in program notes by GCWDB.

All case notes must:

- Be detailed, reflecting the complete interaction or action,
- Have the proper use of pronouns, subject-verb agreement, correct spelling, be coherent, and contain accurate information,
- Be entered daily (under normal circumstances) after any action related to the case and no more than seven (7) days under special circumstances, and
- Be consistent with other information entered in the virtual case management system.

Declination of Services
At any point an individual declines WIOA services, a detailed case note must be entered.

Failure to Complete Activities Within Specified Time Frame
If any required action of service provider staff is not completed within a specified time frame, an explanation in the form of a detailed case note must be entered.

Uploads
All documents related to any case note must be uploaded in the virtual case management system. Uploaded documentation must be clear and legible. Some documentation may be source documents for more than one data element and need only to be uploaded one time, provided all data elements are indicated prior to the upload. Upload documentation according to the guidelines below.
Click on “Add New Document” Documentation Item:

- Choose the item being uploaded. Uploaded Documentation:
- Universal: Documentation used to determine eligibility.
- Enrollment: Documentation used to validate or support data elements, career services, training, performance measures, or other documents required by state and/or local policy.

Type of Document (Multiple types of documentation can be chosen.):

- Eligibility: documentation was used to determine eligibility.
- Validation: documentation was used to validate data/information entered into the virtual case management system.
- Supporting: documentation is used to support a service and training entry or case note entered into the virtual case management system.
- Follow-up: documentation to support follow-up services.
- Employment Planning: documentation used to support employment planning.

Data Elements to be verified:

- Data Elements to be verified vary by enrollment.
- If multiple enrollments are chosen, you will be required to choose the applicable data element for each enrollment.

Application and Registration
A GCWDB WIOA Title I Adult and/or DLW programs application titled “Apply for Services” is available on the home page of the GCWDB website. At the point, an applicant clicks “SUBMIT INFORMATION,” the system sends an e-mail directly to the designated service provider staff person, as well as to the GCWDB executive director. Paper applications are also available and may be submitted via a variety of methods.

At the point an application is received by designated service provider staff person via the electronic system from the GCWDB websitehttp://www.greencountryworks.org, via e-mail, via facsimile (fax), via paper copy, and via any other documentable method, the following steps and time frame apply. Therefore, service provider staff absences or vacancies shall be covered immediately and the GCWDA OSO, GCWDB executive director, respective Oklahoma Works American Job Center (AJC) manager, and any other appropriate individuals promptly advised via e-mail of the staff absent or vacant, the staff person covering and the duration of the coverage or expected duration of the coverage, with additional e-mail reflecting updates to the coverage submitted in a timely manner. This process is to ensure no lapse in services.

The service provider will put procedures in place for timely processing of applications and shall submit that process in written form to the GCWDB executive director at the beginning of every program year or upon request by GCWDB.

Upon receipt of an application by a case manager, the case manager will immediately:

- Check for completion of the applicant's registration in the virtual case management system;
- Review the application, referral form (if one exists), any other documents received pertaining to the applicant, and all workforce history and case notes in the virtual case management system to familiarize themselves with the applicant;
- Contact the applicant via the applicant's phone number, or other contact method noted by the applicant, and follow-up via e-mail: confirming instructions conveyed and any determinations made or confirming attempted contact via phone call, voicemail, or text, to include case manager name, office phone number, link, and quick response (QR) code to Oklahoma Office of Workforce Development's (OOWD's) GCWDB Customer Satisfaction Survey at https://www.surveymonkey.com/r/GreenCountryWFB

At first contact the case manager must:

- Ensure the applicant has completed registration in the virtual case management system, The State of Oklahoma's current online case management system. If the applicant has not completed registration, instruct the applicant to do so and provide technical assistance to aid in the completion if necessary. Case managers may not provide answers to questions within the virtual case management system registration or complete the virtual case management system registration for the applicant but may provide technical assistance to accomplish completion.
- Determine if current basic eligibility documents are uploaded in the participants the virtual case management system account. If basic eligibility documents are not present, request basic eligibility documents. Provide technical assistance to help obtain those documents if necessary.
- Request program eligibility documents, providing technical assistance to help obtain those documents if necessary.
- Perform initial assessment or set an appointment to do so.
- Document existing skills, work history, career pathway discussion and an outline of the quickest route to gainful employment which will achieve self-sufficiency.
- Determine basic eligibility for the Adult and/or DLW programs. Every applicant regardless of Oklahoma Workforce Development Area must be provided basic eligibility determination.
- Provide applicants with the Basic Service:
    - "Referral to WIOA Services" if the applicant is determined to be outside of GCWDA, referring the applicant to the appropriate workforce development area using the Referral to Partner or Community Resource available at the GCWDB website; or
    - "Orientation to WIOA Services" if the applicant is determined to be inside GCWDA, including requirements of participation and follow-up services addressed with the applicant.
- Provide every applicant with the Complaint Procedures Condensed available at the GCWDB website, verbal advice of complaint procedures, including that an Equal Opportunity Officer (EOO) is available to assist with the process and Complaint Procedures Condensed is available at any time at the GCWDB website, as are Discrimination and Complaint Procedures and Programmatic Grievances and Complaints,

all which may be visually read, screen reader read, or provided printed at request, as well as in large font either digitally or printed at request, to applicants or any person.

The service provider will put procedures in place for timely processing of eligibility determination and enrollment and shall submit that process in written form to the GCWDB executive director at the beginning of every program year and upon request by GCWDB.

Enrollments and eligibility are valid for thirty (30) days and will not be backdated. Labor Exchange (LE) enrollments do not require supervisory approval, both Adult and DLW enrollments are automatically entered into a pending queue for supervisory approval when entered into the virtual case management system by front-line staff. Adult and DLW enrollments must be approved by the service provider supervisor, verifying the client's eligibility including uploaded documentation, self-attestation, and case notes, before there is any expenditure of Adult or DLW funds. Enrollments left in pending status over 30 days will automatically be denied. Program enrollments denied for being in pending status over 30 days require a redetermination of eligibility and new enrollment completed, including collection of data validation documentation. Enrollments open for less than thirty (30) days do not count toward service provider contract extension measures, although clients may fall into Federal performance measures.

If an applicant is enrolled in any program, applicable and adequate services must be provided to address **all** needs and barriers. Please review Oklahoma Workforce Development Issuance (OWDI) #09-2017, CHANGE 2, Attachment I: Service List (available at https://oklahomaworks.gov/local-workforce-boards/wioa-policy-center/), noting which services do and which services do not "Set Participation" and the services applicable to each program.

National Reporting System (NRS) approved educational functioning level (EFL) assessment must be completed, if necessary, as soon as possible, and not later than thirty (30) business days following program enrollment. A NRS approved EFL assessment must be administered if an applicant is a school dropout, has ever been on an Individualized Educational Plan (educational IEP) or if the case manager determines a need for EFL assessment.

This is the beginning of the initial assessment which, for Adults or DLWs, provides a foundation for IEP development.

Application Case Note:
- Includes the date the application was received
- Includes the date contact or attempted contact was made to the applicant
- Includes if the contact was in person, by telephone, or if a voicemail, text message, or other communication was made
- Includes what was said or conveyed during the contact
- Includes that applicant was advised of complaint procedures and provided a copy of Complaint Procedures Condensed from the GCWDB website

Upload:
- Completed GCWDB WIOA Application for Services (form or online digital record)
- Referral form if one exists
- Signed Complaint Procedures Condensed

S&T:
- Orientation to WIOA Services (for applicants in GCWDA)
- Referral to WIOA Services (for applicants outside GCWDA)

Basic Eligibility

All WIOA program applicants must provide documentation of basic eligibility:

- Age/date of birth,
- Selective Service registration (if applicable), and
- Eligibility to work in the United States, see List of Acceptable Documents to Verify Eligibility to Work in the GCWDB DVSDR policy at the GCWDB website.

Selective Service Registration:

The service provider that enrolls individuals in WIOA Title I-funded activities is the entity responsible for verifying selective service registration for males seeking to enroll in WIOA programs. If a male turns 18 while participating in any applicable services, registration with Selective Service must be completed no later than 30 days after he becomes 18 in order to continue to receive WIOA Title I-funded services. If a man under the age of 26 refuses to register with the Selective Service, WIOA Title I-funded services must be suspended until he registers.

Acceptable documentation showing registration status includes:

- Selective Service Acknowledgement letter
- Form DD-214 "Report of Separation"
- Screen printout of the Selective Service Verification which can be found at https://www.sss.gov/verify/. For males who have already registered this website can be used to confirm their Selective Service number as well as the date of registration, by entering a last name, social security number, and date of birth.
- Selective Service Registration Card
- Selective Service Verification Form (Form 3A)
- Stamped Post Office Receipt of Registration

Exceptions to Selective Service Registration

For U.S. citizens, Selective Service registration is not required if the individual falls within one of the following categories. *In these instances, service staff may proceed with enrollment and service delivery:

- Men born on or before December 31, 1959;
- Men who are serving in the military on full-time active duty;
- Men attending the service academies;
- Disabled men who are continually confined to a residence, hospital, or institution; and/or
- Men who are hospitalized, institutionalized, or incarcerated are not required to register during their confinement; however, they must register within 30 days after being released if they have not yet reached their 26th birthday.
- Persons who were designated female at birth and have since undergone gender reassignment. **

For non-U.S. citizens, Selective Service registration is not required if the man falls within one of the following categories:

- Non-U.S. male who came into this country for the first time after his 26th birthday.

Acceptable forms of supporting documentation include:

- Date of entry stamp in his passport;
- I-94 with date of entry stamp on it; or
- Letter from the U.S. Citizenship and Immigration Services (USCIS) indicating the date the man entered the United States presented in conjunction with documentation establishing the individual's age.
- Non-U.S. male who entered the U.S. illegally after his 26th birthday must provide proof that he was not living in the U.S. from age 18 through 25.
- Non-U.S. male on a valid non-immigrant visa.

*Note: This list is not intended to be exhaustive. Please visit the Selective Service website for more information about the registration requirements at www.sss.gov. Selective Service also provides a quick reference chart (https://www.sss.gov/wp-content/uploads/2020/11/WhoMustRegisterChart.pdf) showing who must register.

**Note: Per the Selective Service website, individuals who are born female and have a gender transition are not required to register regardless of their current gender or transition status. U.S. citizens or immigrants who are born male and have had a gender transition are still required to register.

Males 26 and Older Who Are Not Registered

GCWDB requires a completed Selective Service Status Form, available at https://www.sss.gov/forms, signed by the applicant, and a signed detailed statement that outlines the reason(s) why the participant did not register with Selective Service to the GCWDB executive director or designated board staff for review and final determination.

If the Director determines the non-registration was knowing and willful, the participant has the option of requesting a Status Information Letter from the Selective Service website using the Selective Service Status Form.

Requesting a Status Information Letter

An individual may obtain a Status Information Letter (https://www.sss.gov/forms) from Selective Service if he believes he was not required to register or did register but cannot provide any of the documentation listed in Section 3 of the Selective Service Status Form. If an individual decides to request a Status Information Letter, they will need to describe, in detail, the circumstances that prevented him from registering (e.g., hospitalization, institutionalization, incarceration, and/or military service from age 18 through 25) and provide documentation of those circumstances to the Selective Service System (SSS). The documentation should be specific as to the dates of the circumstances.

If the Status Information Letter indicates that an individual was not required to register for the Selective Service, then he is eligible to enroll in a WIOA-funded service and service provision should proceed. If the Status Information Letter indicates that the individual was required to register but failed to do so, the individual may only receive services if they can provide evidence to establish the failure to register was not knowing and willful. All costs associated with grant-funded services provided to non-eligible individuals may be disallowed.

How to Determine Knowing and Willful Failure to Register

GCWDB executive director or designated board staff will be responsible for evaluating the evidence presented by the individual to determine whether the failure to register was a knowing and willful failure. The individual should be encouraged to offer as much evidence and as much detail as possible to support his case. Evidence must include the individual's signed A written explanation and supporting documentation of his circumstances at the time of the required registration and the reasons for failure to register. The following are examples of documentation/evidence that may be of assistance in making a determination in these cases:

- Service in the Armed Forces. Evidence that a man has served honorably in the U.S. Armed Forces such as DD Form 214 or his Honorable Discharge Certificate. Such documents may be considered sufficient evidence that his failure to register was not willful or knowing.
- Third Party Affidavits. Affidavits from parents, teachers, employers, doctors, etc. concerning reasons for not registering may also be helpful to grantees in making determinations in cases regarding willful and knowing failure to register.

In order to establish consistency regarding the implementation of the requirement, SSS has designated the following questions as a model for determining whether a failure to register is knowing and willful.

In determining whether the failure was "knowing," GCWDB executive director or designated board staff will consider:

- Was the individual aware of the requirement to register?
- If the individual knew about the requirement to register, was he misinformed about the applicability of the requirement to him (e.g., veterans who were discharged before their 26th birthday were occasionally told that they did not need to register)?
- On which date did the individual first learn that he was required to register?
- Where did the individual live when he was between the ages of 18 and 26?
- Does the status information letter indicate that Selective Service sent letters to the individual at that address and did not receive a response?

In determining whether the failure was "willful," GCWDB executive director or designated board staff will consider:

- Was the failure to register done deliberately and intentionally?
- Did the individual have the mental capacity to choose whether or not to register and decided not to register?
- What actions, if any, did the individual take when he learned of the requirement to register?

If GCWDB executive director or designated board staff determine it was not a knowing and willful failure and the individual is otherwise eligible, services may be provided. If the service provider staff determines that evidence shows that the individual's failure to register was knowing and willful, WIOA services must be denied. All documents bust be uploaded into the virtual case management system.

Basic Eligibility Case Note:

- Date Verified – Identify the date that the information collected in this note was validated
- Age documentation
- Eligibility to Work in the United States documentation
- Selective Service Registration documentation (if applicable)

Upload:

- Documents verifying basic eligibility

Referral

The design framework services of local programs must ensure that WIOA service providers meet the referral requirements for all participants, including:

- Providing participants with information about the full array of applicable or appropriate services available through GCWDB or other eligible providers, or one-stop partners;
- Referring participants to appropriate training and educational programs that have the capacity to serve them either on a sequential or concurrent basis using the Referral to Partner or Community Resource available at the GCWDB website;
- Ensuring referral to individuals who apply for enrollment in a program of WIOA activities and either do not meet the enrollment requirements for that program or cannot be served by that program. The eligible training provider of that program must ensure that the individual is referred for further assessment, if necessary, or referred to appropriate programs to meet the skills and training needs of the individual.
- Ensuring appropriate referrals to an applicant who declines GCWDB WIOA services.
- Entering referral information in the virtual case management system under "Interagency Referrals."

Referral Case Note:

- Includes referral date
- Includes the partner, agency, community organization name referred to
- Includes a statement why the referral is made

Upload:

- Completed Referral to Partner or Community Resource

Referral Outcome Note:

- Restates referral case note information
- States outcome of the referral

Program Eligibility

Most of the information needed to determine program eligibility will be completed and entered into the system by service provider staff, with cooperation by the applicant, and after self-registration in the virtual case management system is complete. For information on eligibility and documentation requirements, please see GCWDB DVSDR policy at the GCWDB website.

WIOA section 134 authorizes employment and training activities for Adults and DLWs, as defined below.

WIOA 3(2) defines an Adult as an individual who is age 18 or older.

DLW, defined at WIOA 3(15), means an individual who meets the requirements of one of the following categories:

Category 1: Recently Dislocated

An individual in this category:

- Has been terminated or laid off, or has received a notice of termination or layoff, from employment, including a separation notice from active military service (under other than dishonorable conditions); and
- (a) Is either eligible for or has exhausted entitlement to unemployment compensation, or
  (b) Has been employed for a duration sufficient to demonstrate, to the appropriate entity at an AJC as described in WIOA section 121(e), attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a state's Unemployment Insurance (UI) law; and
- Is unlikely to return to a previous industry or occupation, as defined in TA-02-2021.
- Category 2: Plant Closure or Substantial Layoff

An individual in this category:

- Has been laid off, or has received a notice of layoff, from employment as a result of any permanent closure of, or any substantial layoff at a plant, facility, military installation or enterprise. A substantial layoff is defined as any reduction-in-force that is not the result of a plant closing that –
  (a) (a) results in an employment loss at a single site of at least 25 employees over a 30-day period, or
  (b) is determined by the Local Rapid Response Team to be a substantial layoff based on other factors that indicate a significant, negative impact on the community and/or local economy. Such factors may include, but are not limited to:
    i. The local unemployment rate,
    ii. The employer size in comparison to the total number of jobs in the surrounding area,
    iii. The business or enterprise has issued a Worker Adjustment Training Notice (WARN),
    iv. For rural and small communities, the number of employees that lost employment at a single site may be set by the Rapid Response Coordinator and/or Local Rapid Response Team, or

v. Other determining factors as described in local policy.

- Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or,
- For purposes of eligibility to receive services other than training services described in WIOA section 134(c)Title I(3), career services described in WIOA section 134(c)(2)(A)(xii), or supportive services, is employed at a facility at which the employer has made a general announcement that such facility or military installation will close.

Category 3: Loss of Self-Employment Income

An individual in this category:

- was self-employed (including employment as a farmer, a rancher, a fisherman, or an independent contractor or consultant not technically an employee of a firm or agency); and
- is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.

Category 4: Displaced Homemakers

The term “dislocated worker” means an individual who has been providing unpaid services to family members in the home and who-

- (a) has been dependent on the income of another family member but it no longer supported by that income; or
  (b) is the dependent spouse of a member of the Armed Forces on active duty, and whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station, or the service-connected death or disability of the service member; and
- is unemployed or underemployed and experiencing difficulty in obtaining or upgrading employment.

Category 5: Military Spouses

An individual in this category:

- is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code) who:
  - has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or
  - is unemployed or underemployed and experiencing difficulty in obtaining or upgrading employment.

The WIOA Final Rule at 20 CFR 680.130(b) allows States and Local Workforce Development Boards (LWDBs) to define certain dislocated worker terms. Locally defined terms, where allowed, permit LWDBs to streamline services to reflect the needs of job seekers and employers in their communities. LWDBs may define in their policies the following terms, as they pertain to dislocated workers:

- “Recently dislocated,”
- “Employed for a duration sufficient to demonstrate attachment to the workforce,”
- “Significant, negative impact on the community,”
- “General announcement” of a plant closing, consistent with WIOA section 3(15)(B)(ii) or (iii),
- “Unemployed as a result of general economic conditions”,
- “The community in which the individual resides”, and
- “Natural disasters.”

LWDBs and/or service providers may not “redefine” dislocated worker terms set by Federal statute or by the State in this issuance, e.g., the WIOA definition of “family” defined in 20 CFR §675.300 and Attachment III to TEGL 19-16, Key Terms and Definitions. Additionally, each DLW’s file must document the factors upon which their dislocated worker status is based.

Priority of Service Designation
See Data Validation and Source Documentation Requirements (DVSDR) policy at the GCWDB website

Program Enrollment
Program enrollment is the point at which collection of information used in performance reporting begins. All applicable demographic information pertaining to a program participant must be accurately entered in the virtual case management system. The demographic information entered will generate potential eligibility and allow enrollment into appropriate programs. When enrollment is complete, a snapshot of the demographic information will exist in program enrollment. The information in the snapshot will remain unchanged throughout program participation. During initial assessment, these characteristics MUST be reviewed by a case manager, in conjunction with the applicant, and will be verified by the applicant via virtual self-attestation. Only the characteristics used to qualify an individual as eligible for WIOA program enrollment will require appropriate documentation uploaded to the virtual case management system, with the exception of those allowed attested which are noted in DVSDR policy at the GCWDB website).

Assessments
For all assessments given to a participant, the GCWDB service provider must use basic skills assessment instruments and occupational skill levels determination, diagnostic testing and other assessment tools that are valid and appropriate for the target population, providing reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. Any formalized testing used must be appropriate, fair, cost effective, well-matched to the test administrator's qualifications, and be easy to administer and interpret results. Skills related gains may be determined through less formal alternative assessment techniques such as observation, interviews, and evaluations.

Initial Assessment
An initial assessment is a basic career service made available to all individuals through the AJC network and includes a review of demographic information entered into the virtual case management system and pre-determination of programs for which the individual may be eligible.

The initial assessment should include:

- A review of prior workforce program enrollments and/or services, and also includes;
- A basic assessment of skill levels including literacy, numeracy, and English language proficiency,
    - A statement that the participant is not basic skills deficient based on graduating high school and case manager observation, or
    - A statement that the participant is basic skills deficient based on case manager observation or participant interview, and include the test given to determine level of deficiency, date test given, and results of test given.
- Preferred language,
- Preferred mode of contact (phone call, text message, e-mail, social media, etc.)
- Interests,
- Aptitudes,
- Abilities,
- Work history,
- Educational attainment,
- Skills as proclaimed by participant,
- Skills gaps,
- Barriers,
- Participant needs and possible supportive services, in part determined by an applicant's budget,

in order to determine the level of services needed by the customer and contribute to the Comprehensive and Skills Assessment. The use of techniques such as observation, interviews and evaluations are appropriate initial assessment tools. The selection and use of English language proficiency assessment tools, and qualified administrators of such tools, are to be determined by the local area and must be appropriate to the individual receiving the assessment. When an NRS approved assessment is necessary, GCWDB provides the CASAS to be administered by trained service provider staff. The GCWDB service provider will submit proof of case manager required training for all assessments within twenty (20) business days of said case manager hire date to the GCWDB.

The initial assessment should result in a determination of the individual's next steps. Next steps may include but are not limited to:

- A detailed, objective assessment,
- Determination of appropriate program enrollment or co-enrollments,
- Enrollment request to service provider supervisor,
- The development of an IEP,
- The provision of training or education services, and
- Appropriate referrals based on assessments using Referral to Partner or Community Resource available at the GCWDB website.

Initial Assessment Case Note:
The initial case note is a singular note intended to identify all relevant data items captured at enrollment. It is required to follow the GCWDB DVSDR policy at the GCWDB website. Case note elements include:

- Date Verified – Identify the date that the information collected in this note was validated
- Program – Identify the program(s) that the participant is being enrolled into
- Eligibility – Identify the eligibility documentation & criteria to support the participant's program
  Example:
  - Eligibility – Adult or DLW
  - Age – birth certificate, government issued photo ID
  - ETW – photo ID & Social Security Card, Selective Service letter
  - Eligibility criteria used for DLW
  - Priority of service designation for Adult
  - Priority population designation for Adult
  - Area of interest
- Employment Status – identify current employer or previous employer, if unemployed, last date of employment, and how this was verified.
- Wage Status – identify current wage or previous wage, if unemployed
- Veteran Status – identify if the participant is a veteran – validation typically using a DD-214
- Family Size – identify the number of persons in the participant's family. Family is defined in 20 CFR § 675.300 defines family as "two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:
  - A married couple and dependent children;
  - A parent or guardian and dependent children; or
  - A married couple
- Low-Income – identify if participant is low-Income and supporting documentation used to validate low-income status
- All barriers identified during assessment
- Coordination of Resources – identify any resources the participant is receiving (i.e., partner services, TANF, SNAP, SSI, etc.). If none, state that participant is not receiving any assistance. They should also check to ensure no services are available for that client through any partners using the Referral to

Partner or Community Resource available at the GCWDB website.
- Assessment Results – identify the participant's assessment results and review with participant
- Employment Goal or Career Pathway – identify participant's employment goal or career pathway
- Education Summary – identify participant's education history and highest level of educational attainment
- Summary of Needs/Barriers – identify any needs/barriers expressed by the participant (homeless, justice system involvement, etc.). All barriers will be documented and addressed in the IEP
- Client Involvement Statement Date – identify date participant reviewed their IEP, signed their Client Involvement Statement (virtual or paper), and received a copy of their IEP. The date of uploaded Client Involvement Statement (paper) or program note (virtual) should match their signature date.
- Referrals – identify if referrals are made using the Referral to Partner or Community Resource available at the GCWDB website.
- If self-attestation is used to document eligibility, the case note must clearly state why and what it is being used for
- Next Steps – instructions or next steps, with date and time

Upload:
- All documents related to case note
- Income Eligibility Form in the DVSDR policy at the GCWDB website

S&T:
- Initial Assessment

Demographic Information Review

All characteristics that apply to the participant, including all barriers, must be correctly and accurately entered in the virtual case management system and self-attested to by the participant prior to each program enrollment. During initial assessment, staff must review the information with the participant as it is entered in the Universal Demographics screen and prior to the demographic snapshot, self-attestation and submitting for enrollment.

Virtual Signature (Self-Attestation)

The individual provides his/her status or information for a particular data element and then signs and dates the form acknowledging that it is true and correct. The self-attestation is completed as a virtual signature in the virtual case management system with the individual's unique username and password being used as the signature. Eligibility determination and receipt of individual career services and/or training services requires that all individuals self-attest by virtual signature in the applicable enrollment demographics before services are provided. The participant must then verify that the status is true and correct by entering their virtual signature (self-attest) in the applicable program demographics snapshot prior to receiving program eligibility. More information regarding self-attestation is found in the Data Validation and Source Documentation Requirements policy at the GCWDB website).

Basic Skills Assessment

WIOA sec. 3(5) defines basic skills deficiency in adults, as an individual who is unable to compute or solve problems, read, write or speak English, at a level necessary to function on the job, in the individual's family or in society.

If it is identified that an individual is not basic skills deficient, as determined through items such as:
- The participant having a high school diploma,
- The participant self-attesting to not being basic skills deficient, or
- The participant identifies through interview and their IEP they are not basic skills deficient;

then it is not necessary to conduct an NRS approved assessment as part of their initial objective assessment. In this case, case managers need to ensure that it is clearly documented in case notes the method used for determining the participant was not basic skills deficient at enrollment. Sample case notes might look like:

- Participant completed CASAS and results were uploaded. Participant will attend Adult Basic Education to improve reading and math skills. Case manager and participant completed a supportive service needs inventory. Participant likes animals and would like to get training or a job working with animals.
- Participant identified that they were not basic skills deficient through their initial assessment and self-attestation; this is further confirmed by their having a high school diploma. Participant also requested no assistance with basic reading or math skills while developing their IEP. Participant likes working with people and would like to become a nurse.

Case managers must conduct NRS approved assessments for participants who indicate directly, or through other observations that they may be basic skills deficient; such as for participants:

- Who do not have a high school diploma at enrollment,
- Who are on an Individualized Education Program (IEP),
- Who were on an educational IEP while in-school,
- Who identify in their self-attestations as needing assistance with reading or math, or
- Who appear to struggle with completing reading or math portions of basic assessments, such as Career Clusters or a simple personal budget.

  This list is not exhaustive.

In summary, an NRS approved assessment is not required for all enrollments; and the need for such an assessment is dependent on a participant's expressed or observed need. A prior NRS approved assessment completed in the last six months must be used whenever possible. If a partner assessment is not being used, the CASAS is provided by GCWDB for use.

Educational Functioning Level (EFL) Gain Assessment

When measuring EFL gains after program enrollment under the measurable skill gains indicator, WIOA requires standardized assessment for accountability in documenting client educational gains that are aligned with the NRS EFL's. EFL gains are key indicators of program performance and success in preparing WIOA participants for training, postsecondary education opportunities, gainful employment, and economic self-sufficiency. EFL measures are defined by the participant's ability to perform literacy-related tasks in the specific skill areas of reading, math and speaking. The NRS EFL of a student is measured by scale scores on NRS approved standardized assessments. (See Scale Score Ranges for NRS Educational Functioning Levels and NRS Testing Benchmarks [Attachments A and B] for further information.) An EFL gain also provides opportunity to enter a measurable skills gain in the virtual case management system.

A process which allows for comparability across programs within the state in order to provide fair and equitable access to services for individual learners, collect consistent data regarding learner placement and advancement, and maintain accurate data for program planning, improvement, and accountability is required. Consistency cross WIOA funded programs in the state is crucial for determining the instructional needs of individual learners, determining the effectiveness of instruction through learner gains, and providing information regarding local program and/or statewide professional development needs.

Effective October 1, 2018, the approved assessments for EFL gains are:

- Test of Adult Basic Education (TABE) – Adult Basic Education (ABE) Reading, Language, Mathematics Skills
- TABE Complete Language Assessment System – English (CLAS-E) – English Language Learners (ELL) Reading, Listening, Writing, and Speaking Skills
- CASAS – Adult Basic Education Reading and Math; English as a Second Language.

- Basic English Skills Test (BEST) Literacy 2008 – ELL Reading and Writing Skills
- BEST Plus 2.0 – ELL Speaking and Listening Skills

To ensure valid results, individuals administering these assessments will follow all assessment administration and scoring guidelines established by the publishers.

- The TABE and CASAS are appropriate for assessing all ABE levels
- TABE CLAS-E, CASAS (Forms 27, 28, 081-088, 513, 514), BEST Plus 2.0, and BEST Literacy are appropriate for assessing ESL levels.
- The TABE Locator and CASAS Appraisal tests should be administered first and used to determine the appropriate Education Level to administer in each subject area. Individual learners unable to complete the TABE Locator Test will be administered the TABE Literacy Level (L) Test. Level L is not approved to measure learning gain.
- Different Forms of the same Level of the TABE and CASAS will be used for the pre- and post-assessments. Example: If a student is pre-assessed using TABE Form 11, Level M, they would then be post-assessed using TABE Form 12, Level M.
- TABE 9/10 should never be mixed with TABE 11/12. Students tested in TABE 9 should be assessed TABE 10. TABE 11 should be paired with TABE 12 only.

An individual's lowest scale score will be used for placement in an EFL and to document learning gains in accordance with NRS guidelines. If this is not the case, written documentation should be placed in the individual's file explaining why the lowest scale score subject area is not being tracked for learning gain. Subject area scores to be used for measuring individual learner gain include reading, total math, or language are located in Scale Score Ranges for NRS Educational Functioning Levels (Attachment A).

Basic Skills Pre-Assessment:
A basic skills pre-assessment should assess the individual learner in the areas that are the focus of instruction, using an appropriate standardized test. If a participant does not have an NRS approved EFL dated within the last six months from a partner entity, a pre-assessment should be completed immediately and not longer than within 3 days of enrollment. Pre-assessment scores must be documented in the virtual case management system in the enrollment details testing screen once the assessment is provided and the measurable skills gain is entered into the system. Documentation must be noted in the participant's IEP and must be uploaded in the applicable enrollment.

Basic Skills Post-Assessment:
If a participant is pre-assessed for the measurable skills gain EFL performance measure the participant must receive the appropriate instructional hours before the participant may be post-assessed according to the following NRS-approved publisher guidelines:

- TABE 9/10 – Entry Levels 1-4: Minimum 40 hours of instruction (50-60 recommended)
- TABE 9/10 – Entry Levels 5-6: Minimum 30 hours of instruction (30-59 recommended)
- TABE 11/12* – Entry Levels 1-6: Minimum 40 hours of instruction (50-60 recommended)
- CASAS – Levels A – D: Minimum 40 hours of instruction (70-100 recommended)
- TABE – CLAS-E: Minimum 50 hours of instruction (60-95 recommended)
- BEST Plus 2.0 Minimum 60 hours of instruction (80-100 recommended)
- BEST Literacy Minimum 60 hours of instruction (80-100 recommended)

* Based on the test publisher recommendations and to avoid a possible "practice effect," the same TABE Form (11 or 12) should not be administered to a participant more often than every six months or 120 instructional hours.

If a participant exits the program without taking a post-assessment, a new assessment should be administered to determine EFL and no EFL may be obtained without the minimum hours of instruction requirement.

Post-assessment scores can only be documented in the virtual case management system once the required number of instruction hours have been completed and documented. Documentation must be noted in the participant's IEP, uploaded in the applicable enrollment and results recorded in appropriate testing screens.

EFL Case Note(s):

A case note must be entered when a pre or post-test is given or obtained from a partner.

- Includes the type of test (pre or post)
- Includes the name of the test (CASAS, TABE)
- Includes if gains were earned

Upload:

- Test results

Individual Employment Plan (IEP)

Each individual enrolled in an Adult or DLW program must have an IEP to identify employment goals, appropriate achievement objectives (including both long-term and short-term goals), and appropriate combination of services to achieve the employment success of the individual. The IEP is an individualized career service, is jointly developed by the participant and case manager, is an ongoing strategy that is flexible to accommodate a participant's needs and is designed to help ensure a positive employment outcome. IEP goals are defined as the desired short- and long-term outcomes the participant wants to achieve. Achievement objectives are the steps established between the case manager and client that, when reached, represent successful completion of a particular goal or portion of the IEP. Each IEP begins with a comprehensive assessment or evaluation. The purpose of the assessment or evaluation is to identify employment goals or a career pathway for the individual, determining the skill levels and service needs necessary for the individual to obtain or retain employment. Case managers are required to utilize the virtual IEP located at the Enrollment Details page of the virtual case management system. The initial IEP requires an entry for each of the 14 components. Resources and services funded by workforce partners and community-based organizations must be documented in the IEP. The participant must virtually sign the IEP as acknowledgement that the plan was jointly developed with their case manager/career planner. Additionally, the IEP and/or program notes need to be modified to reflect any deviations (e.g., goals and services necessary for the attainment and retention of successful employment) as they are identified. Change to an IEP requires a signature/virtual attestation of the participant when:

- The employment or training goal has been revised,
- Extended training time is necessary,
- There is a new training program or provider,
- There is a gap in service,
- There are newly identified needs or barriers, and
- There are any other significant change(s) to the participant's plan.

Additionally, documents must be uploaded to the case management system when necessary to support changes in the IEP, and the participant must always be given the option to receive a virtual or printed copy of the IEP when it is initially created and when the plan is modified. Details on the development of the Individual Employment Plan are found at https://oklahomaworks.gov/wp-content/uploads/2019/07/OWDI-03-2019_10.11.19.pdf.

The virtual IEP includes the fourteen (14) components below, and are further described in

Attachment G of this issuance:
1. Comprehensive Assessment & Career Research
2. Employment Goals & Achievement Objectives
3. Training Goals
4. Client Strengths and Attributes
5. Combination of Services to Overcome Needs/Barriers
6. Assistive Technology Needs for Achieving Goals
7. Client Responsibilities and Agency Responsibilities
8. Economic Need Statement and Planning
9. Supportive Service Needs
10. Follow-up Services Planned
11. Performance Goals & Accountability Indicators
12. Client Progress Review
13. Additional Notes
14. Client Involvement Statement

The initial development of the IEP requires entries in the virtual case management system for components 1 - 11 and component 13. However, the initial entry for Supportive Service Needs (component 9) may, for example, be a statement that the participant has indicated they currently have no supportive service needs and the topic will be reviewed during future contacts. Additionally, an entry of not applicable (N/A) may be entered in a section that does not pertain to the individual. For example, N/A may be entered when there are no Assistive Technology Needs (component 10), or when Additional Notes (component 13) are not vital to the initial IEP.

Comprehensive Skill & Career Assessment
A comprehensive skill and career assessment is an individualized career service that is provided to an individual after it has been determined that services are required to retain or obtain employment. This assessment will identify the service needs, academic levels, goals, interests, skill levels, abilities, aptitudes, supportive service needs, and measures barriers and strengths of the individual. It includes a review of basic and occupational skills, prior work experience, employability potential, interests, aptitudes, supportive service needs and developmental needs. The purpose of the assessment is to identify appropriate services and career pathways that are appropriate for the individual and all information must be incorporated into an IEP.

For the purpose of the basic and occupational skill levels determination, diagnostic testing and other assessment tools may be utilized. Assessment instruments that are utilized must be valid and appropriate for the target population, providing reasonable accommodation in the assessment process, if necessary, for individuals with disabilities. Any formalized testing used must be appropriate, fair, cost effective, well-matched to the test administrator's qualifications, and be easy to administer and interpret results. To identify employment barriers and appropriate employment goals the use of in-depth interviewing and evaluations are appropriate assessment tools.

Comprehensive Skill and Career Assessment Case Note:
Comprehensive skill and career assessment detailed program note must include:
- An explanation of the skills the participant already possesses from prior employment and experiences and how those skills affect the participant's ability to get a job
- An explanation of career pathways discussed with the client.
- An explanation detailing that the case manager has determined that the participant needs WIOA services to obtain and/or retain employment.

- Details about how the participant has tried to seek employment.
- A statement reflecting factors that affect employability.
- Results from a career assessment.
- An explanation that links the participant's interests and skills from the initial assessment and objective assessment to the results of the career cluster.
- A statement detailing all assessment tools assigned by the case manager, results of the assessments, and what the participant should accomplish with the tools.
- An explanation that the case manager and the participant discussed all of the above information and how the information impacted the participant's IEP and WIOA services.
- If any items in the IEP or S&T are not reflective of the assessment information gathered, a detailed program note must be entered explaining the reason.

Additional specialized assessments may be required to identify academic levels, goals, interests, skill levels, abilities, aptitudes, and supportive service needs.

Upload:

- Formalized assessment results

S&T:

- Career Planning
- Comprehensive Assessment

Client Progress Review

Progress reviews of the IEP goals must be documented in component 12 of the IEP, Client Progress Review. The IEP must be reviewed every thirty (30) days at required participant contact. A brief summary of how the individual is progressing in the current phase of their employment plan and a review of each section of the IEP.

The Client Involvement Statement.

The final component of the IEP is a signed virtual or paper Client Involvement Statement. The participant must agree to the employment goal(s), achievement objectives, and combination of services listed in their IEP, and virtually sign the Client Involvement Statement upon development. When the IEP/Client Involvement Statement is signed virtually, it must be addressed in the participant's program notes.

Career Services

WIOA authorizes career services for Adults and DLWs, which must be made available in all comprehensive American Job Centers (AJCs). WIOA distinguishes three levels of career services: basic career services, individualized career services, and follow-up services, with no sequential requirement for these services. Career services under this approach provide local areas with the flexibility to target services to the needs of the customer, while still allowing for tracking of outcomes for reporting purposes. Career services may be provided in any order, recognizing each individual may not need all types of career services or may need different types of career services at different stages in their career pathway. The three categories of career services are defined in TEGL 16-16, One Stop Operations Guidance for the American Job Center Network. The categories are basic career services, individualized career services, and follow-up services. A list of services may be found in Attachment I of OWDI 09-2017, the most recent WIOA Core Performance Measures policy found at https://oklahomaworks.gov/wp-content/uploads/2019/09/OWDI-09-2017-Change-2-WIOA-Core-Performance-Measures-Policy.pdf

Basic Career Services

Basic career services are accessible in all Oklahoma Works AJCs statewide and must be made available to all individuals seeking employment and training services. Basic career services include eligibility determinations, initial skill assessments, labor exchange services, provision of information on programs and services and program referrals, all of which may be provided by both the Adult and DLW programs, as well as through the labor exchange (LE) program services provided by the Wagner-Peyser (WP) staff of the Oklahoma Employment Security Commission (OESC). Self-service and information only basic career services do not set participation for Adult and DLW programs or for the Title III ES program.

Individualized Career Services

Individualized career services must be made available after it is determined by ES and WIOA Title I staff that, particularly for individuals with barriers to employment as defined in WIOA 3(24), services are required to obtain or retain employment. The provision of individualized career services must be consistent with any applicable statutory priorities, e.g., Veterans and Eligible Spouses, the Adult Priority of Services, and Priority Populations under WIOA.

Individualized career services are generally more time intensive than basic career services and are customized to each individual's needs. The provision of individualized career services must be based on the employment needs of the individual as determined jointly by the individual and the career planner/case manager Receipt of any individualized career service sets participation and, therefore, performance. All individualized career services must be documented in the IEP.

The following are individualized career services, as listed at 20 CFR §678.430(b)(1)-(11):

- Comprehensive and specialized assessments of skill levels and service needs, which may include:
  - Diagnostic testing and use of other assessment tools, and
  - In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- Development of the IEP to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve their employment goals, including information about eligible training providers.;
- Group counseling;
- Individual counseling;
- Career planning;
- Short term-prevocational skills, such as:
  - development of learning skills
  - communication skills
  - interviewing skills
  - punctuality
  - personal maintenance skills, and
  - professional conduct;
- Internships and work experiences linked to careers (including transitional jobs);
- Workforce preparation activities;
- Financial literacy services, such as those described in WIOA sec. 129(b)(2)(D) and 20 CFR §681.500;
- Out-of-area job search assistance and relocation assistance; or
- English language acquisition and integrated education and training programs.

If AJC staff or partners determine individualized career services are necessary for an individual to obtain or retain employment, these services must be made available to the individual, provided the individual meets the respective program eligibility requirements. Recent assessments, interviews or evaluations completed by workforce partner programs may be used by AJC staff to determine if individualized career services are appropriate or necessary for an individual. GCWDB provides the CASAS to determine basic skills deficiency and accepts other assessments as described beginning on page nineteen (19) for that purpose. GCWDB also recognizes Career Clusters (Attachment C) for career planning. GCWDB ensures eligibility determination procedures are consistent with this Federal, State, and local policies. The provision of individualized career services must be based on the employment needs of the individual as determined jointly by the individual and the case manager and must be documented in the IEP.

OESC Employment Services (ES) has specific obligations in serving unemployment insurance (UI) claimants and carrying out components of the State's UI program, which include:

- Coordination of basic career services, particularly LE services;
- Targeting UI claimants for job search assistance and referrals to employment; Administering UI work test requirements, including obtaining and documenting relevant information for eligibility assessments and providing job search assistance and referrals to employment;
- Provision of referrals to UI claimants for training and education resources and programs, including but not limited to Pell Grants, GI Bill, Post 9/11 Veterans Educational Assistance, WIOA, higher education assistance, and Vocational Rehabilitation;
- Provision of application assistance to UI claimants for training and education resources and programs, including but not limited to Pell Grants, GI Bill, Post 9/11 Veterans Educational Assistance, WIOA, higher education assistance, and Vocational Rehabilitation;
- Outreach, intake (including identification through the State's Worker Profiling and Reemployment Services system of UI claimants likely to exhaust benefits and related programs, such as the Reemployment Services and Eligibility Assessment program), and orientation to information and other services available through the American Job Center network;
- Provision of information and assistance regarding filing claims under UI programs, including meaningful assistance to individuals (including individuals with language or other program access barriers) seeking assistance in filing a claim.
- Meaningful assistance means providing assistance:
    - In the AJCs, using staff who are well trained in UI claims filing activities, the rights and responsibilities of claimants, and information necessary to file a claim, or
    - By direct linkage: via phone or other technology, such as live web chat and video conference, as long as the assistance is provided by appropriately trained and available staff and within a reasonable time;
    - Technology-based approaches to providing meaningful assistance must ensure Oklahoma Works AJC customers have access to appropriately trained staff within a reasonable time. The referral of customers to the OESC self-service website or public phone line where an individual is placed into a queue with all other UI claimants is not meaningful assistance; and
    - The cost associated in providing meaningful assistance may be paid for by OESC's UI administrative funding, the WIOA Adult or DLW programs, the ES program, or some combination of these funding sources.
    - OESC provides training to staff statewide ensuring they can answer basic questions about an individual's claim. In addition, the online filing system (ONICv2) allows individuals easily accessible self-service options such as PIN reset, claim balance and payment detail, ability to view fraud or claimant error overpayments, appeals filing, multiple browser compatibility, print or mail 1099, and ability to view non-monetary determinations. Claimants can access these options anywhere there is internet, but specifically at the local office where staff will assist them in navigating the site and also answer questions about the claims process.

Training Services

Training services are critical to the employment success of many Adults and DLWs. When training is necessary to achieve the participant's employment goal(s), the training must be for an in-demand occupation as determined by GCWDB and, with certain exceptions, must be provided by an eligible training provider (ETP). A current demand occupations policy may be found at the GCWDB website. The receipt of any training service sets participation for performance reporting purposes.

Types of training services that may be provided include:

- Occupational skills training, including training for nontraditional employment;
- On-the-job training (OJT) (§§680.700 – 680.730);
- Incumbent worker training (WIOA 134(d)(4), §§680.780 - 680.820, and OWDI #09-2019);
- Programs that combine workplace training with related instruction, which may include cooperative education programs;
- Training programs operated by the private sector;
- Skills upgrading and retraining;
- Entrepreneurial training;
- Transitional Jobs in accordance with WIOA 134(d)(5), §§ 680.190 and 680.195, and OWDI #22-2017;
- Job readiness training provided in combination with the training services described in any of clauses (a) through (h), above;
- Adult education and literacy activities, including activities of English Language acquisition and integrated education and training programs, provided concurrently or in combination with services provided in any of clauses (a) though (g); and
- Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training (§§ 680.760 and 680.770).

The IEP must document the need for training services. With few exceptions, the need for training will be determined through an interview, evaluation, or assessment and career planning informed by local labor market information and training provider performance information, or through other career services the participant has received. However, there is no requirement for the provision of career services as a condition to receive training services. When career services are not provided prior to training, an interview with the participant must be documented in a detailed case note to validate the reason why an upfront assessment or evaluation was not required. The interview should address any career planning activities completed by the participant that support direct placement in training services. Additionally, the need for training may be determined based on the provision of a partner entity's assessment(s) or when it has been determined that additional training is required to advance toward an established career pathway. Each step of a career pathway plan must be documented in the IEP.

As with the provision of career services, service provider staff should use previous assessments or evaluations that have been conducted by another education or training partner to make training determinations, thus reducing duplication, and developing enhanced alignment across partner programs. When an assessment completed by a workforce partner program is utilized to determine academic levels, skill levels, and service needs, the assessment score must be entered in the appropriate enrollment section of the virtual case management system for reporting purposes.

Under WIOA, training services may be made available to Adults and DLWs who:

- After an interview, evaluation, or assessment and career planning activities by an AJC staff member or partner, are determined:
    - Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment, through career services alone;
    - In need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
    - Have the skills and qualifications to successfully participate in the selected program of training services;
- Select a program of training services directly linked to the employment opportunities in the local area or

the planning region, or in another area to which the individual is willing to commute or relocate;

- Are unable to obtain other grant assistance for such services, including State-funded training funds, Tribal funds, TAA, TANF, or Federal Pell Grants, or require assistance beyond that available through other workforce partners, educational entities, or other grant assistance programs, including Federal Pell Grants, State-funded training programs, Tribal entities, scholarships, and other sources of education and/or training funds. GCWDB and the contracted service provider must ensure the coordination of funds available to pay for training, taking into consideration the following:
  - Pell grants and other grant assistance must be utilized first for the cost of training and mandatory fees;
  - Title I funds may be used to supplement a Pell grant and/or other grant assistance that does not cover the entire cost of tuition and mandatory fees, but may not supplant a Pell or other grant assistance;
  - Training services may be provided to an individual while an application for a Pell Grant is pending, as long as arrangements have been made with the training provider and the WIOA participant regarding allocation of the Pell Grant. If the individual is subsequently awarded a Pell Grant, the training provider must reimburse the local area the WIOA funds used to underwrite the training for the amount the Pell Grant covers, including any tuition and education fees the training provider charged to attend training, from the Pell Grant award. Reimbursement is not required from the portion of the Pell Grant disbursed to the WIOA participant for other education-related expenses, per 20 CFR § 680.230;
  - The full cost of participation in training services may be taken into consideration, including the cost of support services and other appropriate costs related to training program attendance, as defined by GCWDB;
  - VA benefits for education and training services do not constitute “other grant assistance” under WIOA’s eligibility requirements. Therefore, eligibility for VA benefits for education or training do not preclude a veteran or the veteran’s eligible spouse from receiving WIOA funded services, including training funds. Veterans or spouses of veterans are not required to exhaust their entitlement to VA funded training benefits prior to allowing them to enroll in WIOA funded training;
  - Individuals who are members of a group covered under a petition filed for TAA and are awaiting a determination may be co-enrolled in Adult and/or DLW programs. If the TAA petition is certified, the worker will transition to TAA approved training. If the petition is denied, the worker will continue training under WIOA; and
  - For training services provided through the Adult funding stream, are determined eligible in accordance with the Adult Priority of Service as described in WIOA sec.134(c)(3)(E), as well as in the Statutory Priority for Adult Funds and Veterans and Adult Priority sections of OWDI #07-2020, Change 1 and per local policy.
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Science Technology Engineering Math (STEM) Training

Some of the measures of contract performance for GCWDB's service provider are the measures defined as the projected cumulative [WIOA Title I] participant service level for “Receiving Occupational Training” and “Receiving a Credential” which are designed to support entry into a STEM occupation. The GCWDB wants the service provider to promote and encourage participants to enter STEM occupations. The GCWDB service provider is responsible for career counseling and training geared toward introduction and identification of STEM occupations with eligible program participants. GCWDB has developed our own definition of a STEM Occupation. There are two parts:

1. An occupation that is classified as STEM in the O*Net Online database: https://www.onetonline.org/find/stem
2. An occupation that is otherwise recognized by GCWDB as a STEM occupation.

A complete list of STEM Occupations appears in STEM Occupations (Attachment E).

Coordination of Funds and Resources

Students who are awarded Pell grants or other grant assistance may benefit from a combination of the Pell grant with WIOA training funds or WIOA-funded supportive services, when the cost of training exceeds the amount of the Pell and any other financial aid. The GCWDB WIOA service provider must ensure sufficient documentation of the coordination of resources is maintained for each participant, including but not limited to, the following:

- whether an individual received a Pell grant or other grant assistance for the cost of training and mandatory fees`;
- for individuals not Pell eligible, the reason for ineligibility, e.g., the participant is in default status, the short-term training program does not qualify, ineligibility due to household income, etc.;
- a list of all funding sources considered and the availability of the resource; and
- a list or budget of the participant's estimated monthly living expenses used to determine financial need, excluding any costs associated with alcohol, cigarettes, entertainment, and cannabis.

All funding streams and resources must be explored by the participant with the aid of the case manager and/or the training or educational provider. Efforts to verify the availability of other services or resources must be addressed in Program Notes.

When the cost of training exceeds the amount of Pell grants and other federal grant assistance, state aid, institutional aid, or any other type of financial aid awarded, the student/trainee may benefit from a combination of their financial assistance with WIOA Title I training funds or WIOA-funded supportive services, including needs-related payments. To provide the most benefit to a participant without duplication of funding, each local area must have an established method to coordinate and braid resources. Braiding resources allows multiple funding streams to separately and simultaneously provide specific services to support a participant's training and employment goals. All grant assistance provided to individuals for education or training purposes, including assistance from other workforce partners, educational entities, or other grant assistance, must be documented in the IEP and in the Educational Grants section of the case management system.

Except as stated in the preceding paragraph, other financial aid available to a WIOA Title I participant must be utilized prior to WIOA Title I funds. WIOA funds utilized prior to a Pell or other grant assistance intended for education and/or training will be determined disallowed costs. Documentation must be in the form of a detailed case note, in the IEP, and includes the Coordination of Training Funds (COTF) form.

All assistance provided to individuals for education or training purposes, including assistance from other workforce partners, educational entities, or other grant assistance, must be documented in the IEP. Eligible training providers must enter other financial aid on the Coordination of Training Funds (COTF) form, which is addressed further in the ITA policy at the GCWDB website. However, as training providers may not always be aware of all resources available to every individual, other funding streams/resources must be explored to ensure the participant is unable to obtain grant assistance from other sources to pay for the cost of training. The local area must have a process in place to verify and document that no other resources or funding are available prior to the use of WIOA funds for training. When it has been verified that no other funding is available for training, a case note must be entered to document how the determination was made.

Serving Individuals in Default Status

WIOA programs and services must not be denied solely due to an individual's Federal Student Loan being in default status. However, WIOA funds cannot be utilized to help individuals get out of debt. Workforce staff must counsel WIOA applicants and participants that training providers are not required to admit, enroll, or provide other financial assistance to individuals who are in default status. Workforce staff must require an acceptance letter and/or proof of enrollment from the educational entity prior to creating an individual training account (ITA) to utilize Title I training funds.

Although WIOA funds cannot be utilized to help individuals get out of default, financial literacy services and the provision of information regarding repayment of student loans are recommended services for individuals in default status, prior to and during training funded with WIOA funds. Information regarding financial planning may be found on the Oklahoma Money Matters website: https://www.oklahomamoneymatters.org/.

Additionally, student loan repayment information is located on the U.S. Department of Education site: https://studentaid.ed.gov/sa/repay-loans.

Individual Training Account and Coordination of Training Funds
See Individual Training Account (ITA) policy at the GCWDB website

Training Contracts
Although ITAs are the primary method to be used for procuring training services, in certain circumstances a contract for training services may be developed instead of an ITA. Contracts for services may be used instead of ITAs when at least one of the circumstances below applies, and if the local area has fulfilled the consumer choice requirements of 20 CFR § 680.340. The contract exceptions to an ITA are:

- When the services provided are on-the-job training (OJT), customized training, incumbent worker training or transitional jobs;
- When GCWDB determines there are an insufficient number of eligible training providers in the local area to accomplish the purpose of a system of ITAs. Please note that the determination process must include a public comment period for interested providers of at least 30 days, and be described in the Local Plan;
- When GCWDB determines there is a training services program of demonstrated effectiveness offered in the area by a community-based organization or another private organization to serve individuals with barriers to employment. GCWDB must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the individuals to be served and their specific barriers to employment. The criteria should include:
  - Financial stability of the organization;
  - Demonstrated performance in the delivery of services to individuals with barriers to employment through such means as:
    - program completion rates,
    - attainment of skills, certificates or degrees the program is designed to provide,
    - placement after training in subsidized employment, and
    - retention in employment; and
    - How the specific program relates to the workforce development needs identified in the local plan;
- When GCWDB determines it would be appropriate to contract with an institution of higher education or other provider of training services to facilitate the training of multiple individuals in in-demand industry sectors or occupations, provided the contract does not limit consumer choice; and
- When GCWDB is considering entering into a Pay-for-Performance contract and GCWDB ensures the contract is consistent with 20 CFR § 683.500 and § 683.510.

In addition to the contract exceptions to an ITA, GCWDB may determine that a combination of ITAs and contracts is an effective approach for placement into programs such as Registered Apprenticeship (RA) and other work-based training.

Work-based Training
WIOA allows for additional work-based training options and flexibilities for Adults and DLWs. Work-based

training presents opportunities for fostering increased employer engagement, implementing sector strategies, and encouraging industry partnerships by allowing employers to train employees while continuing to be productive members of the workforce. Transitional Jobs, RAs, On-the-Job Training (OJT), Incumbent Worker Training (IWT), and Customized Training are examples of work-based training.

Transitional Jobs

LWDBs may use up to 10 percent of their combined total of Adult and DLW allocations for transitional jobs as described in §680.190. Transitional jobs are a type of work experience GCWDB may provide under WIOA and are considered to be an individualized career service. Transitional jobs are time-limited, wage-paid work experiences that are only available for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history, as determined by GCWDB, and must include both comprehensive and supportive services. Transitional jobs may be in the public, private, or non-profit sectors. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment. Transitional jobs policy is located in the policy section of the GCWDB website.

Registered Apprenticeship (RA)

RA is a potential source for training and employment services. Local areas are encouraged to use RAs as a career pathway for individuals seeking employment, and as a job-driven strategy for employers and industries. WIOA provides an opportunity for RA programs to be more directly connected to the public workforce system. RA programs automatically qualify to be placed on the Eligible Training Provider List (ETPL), if they so choose, allowing ITAs to support WIOA eligible participants in RA programs, and more directly connect those programs to Oklahoma Works AJCs.

OOWD is committed to fully integrating RA programs as an employment and training solution for the State's AJCs. GCWDB will ensure maximum flexibility in serving participants and supporting their placement into pre-apprenticeship training and RA programs, including making arrangements with RA programs to initiate applications to become an apprentice on behalf of participants.

RAPs consist of two primary training components, both of which are allowable training services under WIOA. The on-the-job learning (OJL) component is the core of the earn-while-you-learn strategy, while the related instruction (RI) component supports the OJL. The RI may be provided by community colleges, technical schools, apprenticeship training schools, or by the business itself, and may be delivered at a school or training facility, online, or at the job site.

There are several ways in which training services may be used in conjunction with RA programs for individuals determined eligible for WIOA title I services:

- An ITA may be developed for a participant to receive RA training.
- An OJT contract may be developed with an RA program for providing both classroom and on-the-job instruction.
- A combination of an ITA to cover the classroom instruction along with an OJT contract to cover on-the-job portions of the RA is allowed.
- Incumbent worker training may be used for upskilling apprentices or journey workers who already have an established working/training relationship with the RA program, provided the requirements of WIOA 134(d)(4) are met.
- Local areas may include supportive services, in conjunction with career and/or training services, to participants in an RA program, provided the supportive services are consistent with WIOA section 134(d)(2), section 12 of TEGL No. 19-16, this issuance, and local policies.
- In all instances, a participant's eligibility for WIOA must be properly established and documented prior to the commitment of funds for RA programs.

Complete and accurate reporting of RA participation is vital to both the State's sector strategy and career pathways approaches. Participants who are placed into an RA with WIOA funds or individuals in an RA at the time of program entry must be clearly identified. An individual in an RA at the time of program entry must identify at the time of registration in their demographic as a registered apprentice. If OJT or skill upgrading is provided as part of a RA program, RA must be entered as the training service in the participant's S&T Plan.

On-the-Job Training (OJT)
OJT continues to be a key method for delivering training services to Adults and DLWs. GCWDB OJT policy is located at the GCWDB website.

Incumbent Worker Training (IWT)
IWT is designed to meet the special requirements of an employer, or a group of employers within the same industry, to retain a skilled workforce or avert the need to lay off employees. Incumbent workers benefit by acquiring the skills necessary to retain employment and/or advancement within the company, or by acquiring the skills necessary to avert a layoff. State guidance on incumbent worker training is found at https://oklahomaworks.gov/wp-content/uploads/2022/08/OWDI-03-2022-Incumbent-Worker-Training-w-Attachments-7-18-22.pdf. GCWDB IWT policy is located at the GCWDB website.

Customized Training
Customized training is designed to meet the specific requirements of an employer or group of employers with the commitment that the employer(s) hire a participating individual or individuals upon successful completion of the training. The employer must pay for a significant portion of the cost of training, as determined by GCWDB. The local board must identify in their policy what constitutes the employer payment, taking into account the size of the employer and other factors GCWDB determines are appropriate, which may include the number of employees participating in the training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities.

Both OJT and customized training are excluded from the credential attainment performance indicator because they rarely result in a credential. However, the State and GCWDB encourage OJT and customized training programs that do result in a credential, whenever possible.

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

- Linkages to community services;
- Assistance with transportation;
- Assistance with childcare and dependent care;
- Assistance with housing;
- Assistance with utility payments;
- Assistance with food;
- Assistance with translations;
- Assistance with educational testing;
- Reasonable accommodations for individuals with disabilities;
- Legal Aid services;
- Medical and prescription services;
- Referrals to health care;
- Assistance with uniforms or other appropriate work attire and work-related tools, including such items

as eyeglasses and protective eye gear;
- Assistance with work and training related licenses and permits;
- Assistance with in-state job search and relocation to a new job;
- Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and
- Payments and fees for employment and training-related applications, tests, and certifications.

Training-related expenses that may be covered by an ITA do not count against the supportive services limit for each registered participant. ITA-related training expenses may include but are not limited to assistance with the purchases of tools required for a specific course; current school admission fees, computer, and lab fees; and books and supplies.

Supportive services are designed to provide a participant with the resources necessary to participate in career services and/or training services. To ensure the highest quality, most comprehensive service provision possible, supportive services funds may be utilized in coordination with career and training services provided by other partner programs and entities jointly responsible for workforce and economic development, educational, and other human resource programs. For example, title I supportive services funds may be utilized when the cost of training is borne by a workforce partner, the partner entity does not have available funds for supportive services, and the supportive services are not otherwise available from other sources. Documentation of the details and the type(s) of supportive services provided to an individual, which entity provided the services, and why the services were necessary for the individual's participation in career or training services must be documented in the Required Supportive Services Needs section of the virtual IEP in case notes and uploads. The "other resources" must be appropriate resources with like services. There must also be an entry in the Service and Training (S&T) section of the virtual case management system to document the provision of the supportive service(s), including when supportive services are provided by a partner entity or community-based organization. Although supportive services provided by funding sources other than WIOA need to be documented as services in the S&T, the budget and payment section of the S&T is only completed when Title I funds are utilized for supportive services costs.

Supportive services are based on financial need and participants are not automatically entitled to supportive services.

WIOA supportive services are limited and must be coordinated with other community resources. In every instance of providing supportive services, the case manager must ensure that no other resource exists or that the need is so urgent that referral to other resources would delay the provision of the support service and create a hardship to the participant. When determining if other community resources are available to cover necessary expenses it is required to show evidence of no less than three contacts with other resources including outcomes of each. When a participant is co-enrolled and/or receiving services from any partner programs, community-based organizations, and/or entities jointly responsible for workforce and economic development, educational, and other human resource programs, those must be contacted first. In the event another community resource is not available, a Telephone Verification form is available at the GCWDB website may be used to document outcome. In the event another community resource is available, the case manager will make a referral for the participant to the resource and follow-up with the provider that the supportive service was obtained. A Referral to Partner or Community Resource form, available at the GCWDB website, must be used to document the provision of the supportive service.

Supportive services funded with WIOA Title I funds are funds of last resort, and when possible, must be coordinated/braided with other supportive services, career services and/or training services funded by partner programs, community-based organizations, and entities jointly responsible for workforce and economic development, educational, and other human resource programs. The separate and simultaneous provision of resources from multiple funding streams will help ensure the highest quality and most comprehensive service provision possible for individuals requiring supportive services to enable their participation in training services. The details of the coordination of services and resources must be documented in the IEP, as well as in Program Notes.

Disallowed Supportive Services

Supportive services may not be utilized to pay for expenses incurred prior to the Participant's enrollment into the WIOA program. Case manager is required to document detail in case notes in the state of Oklahoma's current online case management tool.

- Fines and penalties such as traffic violation, late finance charges, and interest payments;
- Entertainment including tips;
- Contributions or donations;
- Vehicle or mortgage payments;
- Refundable deposits;
- Alcohol or tobacco products;
- Firearms or ammunition;
- Lottery or gaming products;
- Pet food;
- Items for family members or friends;
- In state job search and relocation expenses that are paid for by the prospective employer; or
- Out of state relocation expenses.

Needs-related payments (NRP's):
GCWDB elects to use NRP's as allowed under WIOA.

Coordination with Trade Adjustment Assistance

The Trade Adjustment Assistance (TAA) program, coordinated by OESC, provides additional benefits for dislocated workers laid off by companies directly affected by increased imports or certain shifts of production to other countries. Upon notification that USDOL has certified a business as "trade impacted", affected individuals should contact the local Oklahoma Works AJC for TAA information.

20 CFR 618325(a)(1)] of the TAA Final Rule requires co-enrollment between the TAA Program and the WIOA DLW Program if the trade-affected worker is eligible for the DLW program. Data shows that co-enrollment between the TAA and Title I Dislocated Worker (DLW) programs results in better performance outcomes that are significant and consistent over time. Coordination between the Title I case manager and OESC's TAA staff is essential to ensure successful training completion and allows for the timely provision of individualized career services while improving the effectiveness of both the DLW and TAA Programs. When ES staff identify any supportive needs necessary for the success of TAA participants, they are required to refer TAA-eligible individuals to the appropriate Title I staff member. WIOA staff must then provide supportive services as per this issuance and local supportive services policy. Additional information regarding TAA and DLW co-enrollment may be found in the following documents:

- https://www.doleta.gov/tradeact/taa-data/participant-reporting/docs/Co-Enrollment_FAQ-1.pdf and
- https://www.doleta.gov/tradeact/taa-data/participant-reporting/docs/Co-Enrollment_FAQ-2.pdf

A trade-affected worker has the option of declining co-enrollment with the WIOA DLW program. However, AJC staff must thoroughly explain the benefits of co-enrollment to individuals whose employment is affected by foreign trade. It is recommended that AJC staff obtain a written statement from trade-impacted workers who wish to decline enrollment in the WIOA Dislocated Worker program. The statement should be uploaded to the virtual case management system. Regardless of whether a written statement to decline co-enrollment was provided, AJC staff must document in case/program notes that the benefits of co-enrollment were explained, as well as the individual's stated reason for declining DLW services (i.e., co-enrollment).

TAA covers 100% of tuition, course fees, books, required supplies, and equipment for eligible participants. TAA can also pay training-related mileage above 50 miles (one way) when the participant must travel outside their commuting area, as well as required tolls. However, mileage costs and toll fees must be considered as part of the training approval process to ensure the costs do not result in more than the maximum allowed/approved for training.
The TAA program utilizes the virtual IEP located in virtual case management system. As with IEPs developed for all adults and dislocated workers, all significant changes to the initial IEP require the IEP to be updated/modified and must be signed by the participant.

More information on TAA, including who may qualify for a job search allowance or a relocation allowance, may be found on the Oklahoma.gov website at
https://oklahoma.gov/oesc/individuals/programs/taa.html

Limitations
Although there is no limit to training-related supportive services, they must be determined to be reasonable and necessary for an individual to complete training, The non-training related supportive services limit for each registered WIOA eligible Participant is $500.00 for a lifetime, and they must be determined to be reasonable and necessary for an individual to obtain or continue employment or complete training. The GCWDB executive director, on a case-by-case basis, has the authority to increase this limit by $500.00. To request the additional supportive service amount, a detailed email request must be sent to the GCWDB executive director and a conference call with the case manager and their supervisor will also be completed prior to the approval. This will ensure all other avenues and resources have been thoroughly explored. All supportive documentation must be uploaded and/or input into the virtual case management system, prior to the request.

Provision
Supportive services are usually provided through a voucher system or payments made directly to a vendor (i.e., to pay for clothes, rent or utilities). A completed and current participant budget verifying that the participant does not have the financial resources to obtain the service attached to the request form must be uploaded with all supporting documents. Case managers will submit the Supportive Services Request (Attachment H) to their supervisor for approval.

The supervisor will converse with their designated staff to obtain a supportive service voucher number. The Supportive Service Voucher number must be in the following format: SS- [first 2 letters of county]- [Program Year, as ##]- [sequential number, as ###]- [A, D, or Y for Adult, Dislocated Worker, or Youth] For example, an Adult participant's Supportive Service Voucher is the 4th Supportive Service Voucher issued in Creek County during Program Year 2022. That Youth participant's Supportive Service Voucher number, as obtained from designated staff, would be SV-CR-22-004-A.

A Supportive Services Voucher (Attachment I) must be issued, and the case manager must be informed of the outcome of the request. Case managers must maintain a Supportive Service Tracking Tool (Attachment J) uploaded to the online system that tracks the date and type of supportive services. When uploading an updated Supportive Service Tracking Tool, do not delete the old ones. Case managers will enter all supportive services into the S&T on the date the service was provided. Supportive services will be provided within two business days. The case manager will ensure all documents are uploaded into the on-line system and documentation details are in case notes.

Support Documentation

- For bus tickets, bus passes, or gift cards, a copy of the front and back of the card and both the participant and case manager signatures.
- For rental assistance, a copy of the current rental or lease agreement in the participant's name, with signatures.
- For assistance with car repair, a gas card or mileage reimbursement, a copy of the vehicle registration, registered in the participant's or family member's name; a copy of participant's current vehicle insurance card; a copy of the participant's valid driver licenses; and a copy of the printed estimate for repairs from the vendor. Need should be based on:
  - Other available transportation, bus, carpool, bicycle, etc.;
  - Distance from work or training to residence; and
  - Current participant supportive services budget.

All supportive services payments must have a receipt from the vendor that clearly shows the amount that was paid. If the participant loses the receipt from the vendor, the participant and the case manager must show due diligence in obtaining the receipt, sign a statement saying the participant received the supportive service and document in full detail in a case note in the on-line case file, and GCWDB staff must be notified of the situation to see if other assistance could produce a copy of the receipt.
If a participant is co-enrolled in the WIOA Adult or DLW programs and supportive services are being supplied by Adult or DLW funds, supportive services qualifying as directly related to training must be entered into the state forty percent (40%) Minimum Training Expenditure Rate Tool by the service provider. Transportation and childcare costs are specifically excluded.

Supportive Service Case Notes must include:

- Participant's request for supportive service prior to the participant's actually incurring the expenditure
- Justification for the requested service, stating the reason the service is needed and the barrier the assistance is resolving for the participant to participate in WIOA activities
- Detail that assistance is not available from other sources and outline services provider's efforts to use other relevant community resources before WIOA funds were authorized, including notation of uploaded documents as needed (i.e., phone verification, quotes, self-attestation, etc.) and the name of the person contacted from the other resource
- Identify the cost of supportive services provided and how the participant will pay these expenses in the future, including uploaded budget information
- The date the supportive service was provided
- The outcome of the supportive service

Upload:

- All documents related to the detailed case note
- Referral to Partner or Community Resource
- Supportive Services Request (Attachment H)
- Supportive Services Voucher (Attachment I)
- Supportive Services Tracking Tool (Attachment J)
- Verification of three (3) sources consulted: e-mail, written and signed statement from the partner or community resource, Non-Competitive Purchase Form, or Telephone Verification Form. Forms are

available for download at [https://www.greencountryworks.org/resources/policy-research-best-practices/.](https://www.greencountryworks.org/resources/policy-research-best-practices/)

- Paid receipt from the vendor

S&T:

- Supportive Services

Follow-up Services

The third type of individualized career services is Follow-up Services, which must be provided for no less than 12 months after the first day of employment for Adult and DLW participants who are placed in, or have attained, unsubsidized employment. Follow-up services must be more than an attempted contact, or a contact made only for obtaining information about a performance outcome. Follow-up services occur after program exit and do not change, delay, or extend the exit date (TEGL No. 10-16, Change 1). Examples of WIOA Adult and DLW follow-up services include, but are not limited to the following:

- Counseling individuals about the workplace (i.e., strategies for retaining employment)
- Career pathway planning and counseling
- Contacting individuals or employers to verify employment
- Assistance with work-related problems
- Required contact with the participant's employer
- Peer support groups
- Supportive service referrals to partners or community resources
- The provision of information regarding:
    - Career advancement
    - Educational opportunities
    - new employment opportunities

Follow-up services are provided to ensure the participant is able to retain employment, realize wage increases, and facilitate career progression. Follow-up services must include at least one contact every thirty (30) days for the first six (6) months, and then one time every sixty (60) days for the remainder of thetwelve month follow-up. Contacts must include an offer for follow-up services. Contact made only forsecuring documentation in order to report a performance outcome is not a valid follow-up attempt. A participant may decline follow-up services.

Follow-up Case Note:

Follow-up services are available to participants for twelve (12) months upon program completion. Follow-up activity must occur at least once every thirty (30) days for the first six (6) months and at least once every sixty (60) days for the remainder of the twelve (12) month follow-up period, including employer, wage, hours, position, address, phone, contact numbers, any name changes, and type of follow up service. Refusal of follow-up services must be documented.

Upload:

- Follow-up Form (Attachment F)
- All documents related to the detailed case note

S&T

- Follow-up

Enter participant's wage information in the virtual case management system under "Wages."

Exits and Outcomes

The case manager must accurately record in the virtual case management system all services received and the end date(s) associated with all services. Case managers are required to explain and offer follow-up services; however, a participant may decline follow-up services. When the individual's the virtual case management system record indicates that no services funded by any program tracked by the system were recorded for 90 days and there is no gap in service recorded, the virtual case management system will automatically exit the individual from the WIOA program (and any other common enrollment program) recording the date of the last service received as the common exit date of all programs.

- Career managers must record in the Exit Questions screen the Other Reason for an Exit when a participant did not return to the program for ninety (90) days due to circumstances beyond their control. This screen is not available for input until the participant has exited the program. The career managers must also enter a case note recording the information about the circumstances.
- Once a participant exits the program the career manager must answer all questions applicable to the participant in the Upon Exit and Job Placement section of the Exit Questions screen. Program outcomes must be answered and follow-up contact with the participant maintained so updates on the training status can be made.
- When a participant receives any Type of Recognized Educational/Occupational/Certificate /Diploma/Degree, it must be uploaded into the virtual case management system by choosing Enrollment as the item type and choosing Supporting as the Documentation type. The credential must be recorded in the virtual case management system in the Outcomes section and then select Fourth Quarter after Exit.
- Once a participant exits the program, the Upon Exit and Job Placement questions in the Exit Questions section of the virtual case management system *must* be completed. Program outcomes must be answered and follow-up contact with the participant maintained so updates on the training status can be made.
- If a participant does not return to the program for ninety (90) days due to extenuating circumstances, the Exit Questions section of the virtual case management system must be completed by selecting Other Reasons for Exit and selecting the reason from the drop-down menu. This screen is not available for input until the participant has exited the program. The case manager must also enter a case note recording the information about the circumstances.
- Once a participant exits the program, the Exit Questions section for In-School Status must be answered by selecting the applicable description in the drop-down menu.

Employment in the second and fourth quarters after exit will be automatically captured from wage record data attained with Unemployment Insurance (UI) wage records. Supplemental wage information must also be collected and entered in the Wages section After Exit of the virtual case management system to meet this requirement.

Exit Case Note must, at minimum, contain:

- The reason for exit
- The participant employment exit information, including place of employment, number of hours working, wage, and position
- The details of the exit in case notes, documenting all action plans, activities, and training has been completed
- The services provided and outcomes attained while in the program
- An offer of follow-up services and document any declination of follow-up services
- The reason follow-up services are not planned, including but not limited to:
    - Institutionalized
    - Health/medical or family care
    - Deceased
    - Reserved forces called to active duty
    - Relocated to a mandatory program

Monitoring

The GCWDB is responsible for monitoring and oversight of local Title I programs to ensure fiscal and programmatic accountability. Monitoring will be conducted per GCWDB Monitoring policy found at the GCWDB website.

GCWDB acknowledges that OOWD, USDOL and USDE have the authority to monitor and assess activities to ensure that federal awards are used for authorized purposes in compliance with Final Rules, federal regulations, and State and local policies, and that those laws and regulations are enforced properly, including but not limited to 20 CFR 683.400(c)(1), 683.410(b)(2), and 29 CFR 38.51. *These agencies* maintain oversight of recipient and sub-recipient compliance, including GCWDB, the Green Country Workforce One-Stop Operator, GCWDB's fiscal agent and program service provider. OOWD will conduct program, fiscal, equal opportunity and nondiscrimination, and performance/data quality on-site and desktop monitoring.

Record Retention
In accordance with CFR 627.460(a)(1), Oklahoma requires local areas and WIOA providers to retain records in the participants file and maintain the file for at least three years following the date on which the final cost report charged to a program year's allotment is submitted, or until all audit and litigation issues are resolved, whichever is later. If any litigation, claim, or audit is started before the expiration of the three-year period, the records then must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action has been taken.

IV. Authorization for Clarifications and Additions

The GCWDB Executive Director is authorized to issue additional instructions, guidance, approvals and/or forms to further implement the requirements of this policy, without making substantive change to the policy, except in situations where new or updated state and federal guidance is issued.

V. History

- Replaced GCWDB P-0300100, Adult and Dislocated Worker Policy, previously approved on 10/21/2021
- Replaced GCWDB P-0400200, Eligible Training Providers, previously approved on 06/17/2021
- Replaced GCWDB's Adult and Dislocated Worker Programs Policy Previously Approved on 12.08.2022
- Replaced GCWDB's Adult and Dislocated Worker Programs Policy Previously Approved on 02/09/2023, updated to comply with OWDI 07-2020, Change 1
- Replaces GCWDB's Adult and Dislocated Worker Programs Policy Previously Approved on 04/13/2023
- GCWDB BD Approved and Effective 07/26/2023

VI. References & Additional Reference

- The Workforce Innovation and Opportunity Act of 2014, Titles I and III
- 20 CFR §§ 678, 680 and 681
- U.S. Department of Labor (DOL)/Employment and Training Administration Training and Employment Guidance Letter (TEGL) No. 10-16, Change 2
- TEGL No. 19-16
- TEGL No. 16-16
- TEGL No. 13-16 & TEGL No. 13-16, Change 1
- TEGL No. 10-09
- TEGL No 22:04 & TEGL No. 22-04, Change 1
- TEGL No. 15-12

- TEGL No. 04-20
- TEN No. 01-21
- Federal Register / Vol. 83, N. 24/Monday, February 5, 2018/Notices; Tests Determined to Be Suitable for Use in the National Reporting System for Adult Education
- National Reporting System for Adult Education: State Assessment Policy Guidelines, Revised August 9, 2018
- OWDI 01-2023 Eligible Training Provider
- OWDI 02-2019, Change 2 Data Validation
- OWDI 03-2019 Individual Employment Plan
- OWDI 04-2020 Selective Service Registration
- OWDI 04-2022 Authority to Transfer Funds
- OWDI 04-2019 Assessments
- OWDI 02-2021, WIOA Core Performance Measures and Performance Success
- OWDI 08-2019 Adult and Dislocated Worker 40% Minimum Training Expenditure Rate
- OWDI 07-2020, Change 1 Adult and Dislocated Worker Programs under WIOA and Employment Services under the Wagner, Peyser Act, as amended by Title III of WIOA
- TA 02-2018 Service Definitions
- TA O3-2019 Coordination of WIOA Training Funds and Other Grant Assistance
- 38 U.S. Code § 4213, Eligibility requirements for veterans under Federal employment and training programs
- Section 101 of Title 10, United States Code