

PARTNER WORK

The Workforce Development Board for the Pittsburgh Area

Partner4Work

Executive Committee

8:30 to 10 a.m. March 12, 2025

Via Zoom: <https://us02web.zoom.us/j/88558021062?pwd=5J3vi6VEH5b62TgtHldmgEuVDNev3h.1>

1. **Welcome and roll call**

David Malone, Chair

2. **General Business – Consent Agenda**

ACTION:

- **Approve** the minutes of the December 12, 2024 Partner4Work board meeting and the December 5, 2024 Executive Committee meeting.
- **Acknowledge** the E-vote taken on January 23, 2025 to approve the following contracts
 - Professional Training Associates \$12,900
 - Trade Institute \$16,280
 - Outside Angle \$30,000
 - Eli Cloonan \$19,500
 - Re-Build TPS \$28,560
 - CCAC \$10,000
 - Dynamic \$71,200
 - Ajoy Vase (Event Horizons) \$140,000
- **Accept** all funds since the last Executive Committee meeting
 - \$51,000, McAuley Ministries Foundation
 - \$25,000, The Grantmakers of Western PA/Early Childhood Fund
 - \$20,000, CareerWork\$
 - \$16,579.74, Healthcare Expo support
 - \$50,000, National Fund for Workforce Solutions
- **Approve** updates to policies:
 - WIOA Adult DW & WIOA Youth Policy Guides (addressing eligibility requirements);
 - Procurement Policy;
 - Right to Know;
 - Complaint & Grievance
- **Approve** contracts
 - WIOA**
 - \$5,000 Common Cause Consultants, LLC
 - Industry Partnerships**
 - \$50,000 NEP Group
 - \$100,000 Pittsburgh Robotics Network (PRN)
 - \$10,000 CCAC
 - \$40,000 Module
 - \$60,000 AIU (Apprenticeship with Bloomboard)
 - \$20,000 DePaul School for Hearing and Speech (Apprenticeship)
 - \$100,000 UPMC (LPN to RN Apprenticeship)
 - \$40,000 PA Ambulance Authority (EMT Apprenticeship)

PARTNER WORK

The Workforce Development Board for the Pittsburgh Area

- \$28,560 Re:Build TPS I, LLC (Hillman)
- BEP**
- \$16,000 Consortium for Public Education

Clean Energy

- \$5,995 Pennsylvania Solar Center

3. Committee Reports

- **Audit and Finance**

Steve Massaro, Treasurer, and Kristin Kramer, CFO

- *Vote to approve transfer of \$1,050,000 from WIOA Dislocated Worker City to Adult City and \$400,000 from WIOA Dislocated Worker County to Adult County.*

- **Learn & Earn and Governance**

Debra Caplan, Chair

- *Recommendation for approval of contracted providers for Learn & Earn 2025*

- \$11,625 Aryse
- \$56,500 Auberle
- \$54,500 Bloomfield Garfield Corporation
- \$79,750 Boys & Girls Club
- \$31,000 Braddock Youth Project
- \$19,625.00 Braddock Youth Project
- \$19,375 Community Empowerment Association
- \$19,625 Garfield Jubilee Association
- \$46,750 Goodwill
- \$39,000 Homeless Children's Education Fund
- \$77,750 Homewood Children's Village
- \$54,500 Jewish Family & Community Services
- \$19,625 Latino Community Center
- \$23,250 Legacy Arts Project
- \$54,500 Neighborhood Learning Alliance
- \$17,500 New Century Careers
- \$15,500 Pittsburgh Area Community Schools
- \$126,250 Phase 4
- \$31,250 Pittsburgh Public Schools
- \$11,625 Tech 25
- \$70,000 Youth Enrichment Services
- \$15,500 Youth Guidance

- **Program Optimization Committee**

Cat McLaughlin, Chair

- *Recommendation for approval of contracted providers for EARN and Work Ready, EARN transportation, and EARN adult education*
 - Up to \$3,500,000 Grant Associates
 - Up to \$1,100,000 Goodwill
 - \$91,316 Adult Ed – Literacy Pittsburgh
 - Up to \$350,000 Travelers Aid (EARN)
 - up to \$150,000 Travelers Aid (Work Ready).

4. **CEO's report**

- Federal and State landscape
- Partner4Work changes
- Local and Regional WIOA plan updates
 - [WIOA Local Plan](#)
 - [WIOA Regional Plan](#)

Robert Cherry

5. **Other Business**

6. **Open Forum and Public Comment**

Speakers are limited to three (3) minutes

7. **Adjournment**



Minutes for Partner4Work Board of Directors' Meeting
8:30 to 10 a.m. December 12, 2024
Via ZOOM and in-person at Centre City Tower, 650 Smithfield Street

Board Members Present

Allen, Will
Barcaskey, Rich
Caplan, Debra
Coplan, David
Dalton, Erin
Dozier, Clarence
Gittlen, Ike
Gonzalez, Gabriella
Harris, Carey
Holt, Tim
Houser, Crystal
Huey, Terry
Lavallee, Dan
McEvelly, Katherine
McLaughlin, Cat
Malone, David
Massaro, Steve
Mazza, Steve
Nobers, Jeff
Nunez, Nadyli
Stewart, Joshua
Valentin, Marisol
Washington, Nancy
Wheatley, Jake

Staff Present

Cherry, Rob
Kramer, Kristin
Kreit, Brian
Long, Markese
Moore, Dillon
Puskar, Susie
Wesley, Dr. Carl
Woods, LaDonna

Board Members Absent

Acklin, Kevin
Bey, Jmar
Bullock, Dr. Quintin
Casoli, Rich
Ellsworth, Laura
Kelly, Darrin
Mendoza, Brandon
Rendulic, Mark
Thomas, John
Williamson, Sam

Guests Present

Adaire, Emily (L&I)
Bey, Barata (AACOC)
Bryan, Michelle (Maher Duessel)
Buefort, Troy (guest speaker)
Dick, Jeff (L&I)
Gaudio, Brian (Module)
Higgins, Kiara (DWS)
Hornbake, Daniel (L&I)
Lampman, Chester (L&I)
Leisten, Terri (DWS)
McCartney, Alexis (PA CareerLink®)
Morrow, Leo (L&I)
Russell, Alexis (Russell GC)
Sljva-Blystone, Amy (PA CareerLink®)

Board Meeting Minutes

Chair Malone called the meeting to order at 8:31 a.m. and announced a quorum present.

- Staff, board members and guests were asked to acknowledge their participation in the chat feature of the Zoom meeting.

CONSENT AGENDA

No one wished to discuss any other items in more detail for separate treatment.

ACTION:

- **Approve** the minutes of the June 28, 2024 and September 27, 2024 Partner4Work board meetings and the June 14, 2024 and September 13, 2024 Executive Committee meetings.
- **Accept** all funds since the last Executive Committee meeting
 - \$75,000 Pittsburgh Foundation for Learn & Earn 2025
 - \$45,000 Citizen’s Bank for Bankwork\$
 - \$10,000 UPMC Insurance division for Learn & Earn
 - \$5,000 Pittsburgh Penguins for Learn & Earn
 - \$15,000 National Skills Coalition
 - \$1,000 University of Pittsburgh
 - \$1,000 Community Advisory Group
 - \$229.79 ACA lunch
- **Approve** contracts
 - WIOA**
 - \$20,000 Re:Build TPS I, LLC
 - Building Pathways to Infrastructure**
 - \$67,200 FortyX80, Inc
 - ABA**
 - \$36,666 Dynamic Workforce Solutions
 - Hillman**
 - \$7,500 Women in Tech PGH
 - Build Back Better**
 - \$100,000 Pittsburgh Robotics Network
 - \$71,634 Eos Energy Enterprises, Inc.
 - Management & General**
 - \$4,500 James Jess Grainger
 - \$35,000 Cheryalyn Randall
 - Industry Partnerships**
 - \$6,000 Superior Home Services
 - \$5,000 FamilyLinks
 - Clean Energy**
 - \$18,907 DMI Companies, Inc.
 - TBD**
 - \$27,000 Re:Build TPS I, LLC

The consent agenda was approved. Debra Caplan, Tim Holt, and Dan Lavalley abstained from the acceptance of the UPMC funds.

COMMITTEE REPORTS

Finance Committee

Steve Massaro introduced Michelle Bryan, CPA, from Maher Duessel to provide the audit findings and Form 990 filings for Partner4Work. The audit process, including a financial statement audit and compliance audit under

Uniform Guidance, was seamless, with no material weaknesses, significant deficiencies, or findings noted. The organization received an unmodified opinion, the highest assurance level, indicating the accuracy of financial statements. The organization managed approximately \$21.1 million in federal funding and had a \$3 million increase in net assets, primarily due to restricted grants. Expenses were primarily allocated to project costs (73%) and salaries/benefits (18%). The 990 filings, including one for the collaborative entity, were consistent with prior years and reconciled with the audited financials. Kristin Kramer provided reasoning behind the transfer of funding from dislocated worker to adult due to more adults currently being served vs. those in the dislocated worker category.

On a motion by Debra Caplan, seconded by Dan Lavelle, the transfer of PY23 WIOA funding from Dislocated Worker to Adult was approved. On a motion by Carey Harris, seconded by Debra Caplan, the submission of Form 990 for both TRWIB, Inc. and RWC were approved. On a motion by Dan Lavelle, seconded by Steve Massaro, the audited financial statements for TRWIB, Inc. were approved.

Governance Committee

Debra Caplan reported that the Partner4Work Governance Committee met twice in the past quarter to address board compliance and discuss bylaw updates. To meet compliance requirements, the board will add three new members pending appointment by our city and county elected officials: Brian Gaudio (CEO of Module), Broadus Day (President of the African American Chamber of Commerce), and Alexis Russell (President of Russell Contracting). An orientation for the new members will take place in January. Additionally, 12 current members agreed to serve another two-year term. The Governance Committee plans to evaluate the board's composition over the next year to ensure compliance with the WIOA, improve diversity, and enhance engagement. Debra discussed modifications to the bylaws, including merging the youth and program committees into one for streamlined oversight, introducing flexible two- to four-year board terms, and clarifying executive committee rules regarding voting and decision-making authority. The state-mandated changes align with updated workforce governance policies issued in June 2024, following extensive negotiations with state officials.

On a motion by Steve Mazza, seconded by Carey Harris, the Bylaws revisions were approved as presented without objection. A motion was made by Steve Massaro, seconded by Ike Gittlen to approve the 2025 board meeting and Executive Committee meeting dates as presented. All board members present agreed to approve.

Program Optimization Committee

Cat McLaughlin discussed the joint meeting with the Youth Advisory Committee on December 1st highlighting the EARN and WorkReady programs and the PIT2Work program. EARN and WorkReady support families receiving SNAP or TANF benefits through a two-generation model, integrating services for parents and children while aligning with PA CareerLink centers. The PIT to Work program connects diverse talent pipelines to workforce needs, exemplified by success stories like Troy Buefort, who transitioned to stable employment through the program. Troy presented his experience with the program and the impact it has made on his life. These initiatives demonstrate Partner4Work's commitment to fostering systemic benefits and collaboration across workforce programs.

Learn & Earn

Dr. Carl Wesley provided a Learn & Earn overview and introduced Markese Long, Partner4Work's Director of Career Pathways, to present. Markese discussed the Summer Youth Employment Program, emphasizing Learn & Earn which focuses on providing young people with paid work experiences, career development, and workforce readiness. Over the past decade, Learn and Earn has invested \$14 million into the community and has served over 13,000 young people, with a focus on equity and addressing regional talent gaps. Moving forward, the program aims to expand its provider network, reduce fiscal burdens on service providers by bringing the payroll piece under Partner4Work, and integrate more youth voices in program decisions. A new tiered framework will

provide age-appropriate opportunities, increasing wages and offering more intensive services as youth progress. This initiative also incorporates financial literacy to help youth manage their earnings and future financial decisions.

CEO's report

Rob Cherry discussed the successful efforts to expand apprenticeships, including securing innovative programs like EV Tech and Stationary Engineering at the airport. He highlighted the creation of two new job centers, which provide a more welcoming environment for job seekers, and emphasized partnerships with organizations like the Trade Institute to build a stronger workforce. Partner4Work is working with local businesses, focusing on improving job quality and retention, with notable collaboration with Mainspring for clean energy production. National visibility has grown through speaking engagements at major summits, including the White House, and recognition for staff achievements. Internally, the organization has improved its compliance practices, reducing compliance findings from previous years. There has been a significant increase in the number of people served, particularly in underrepresented communities. He discussed the plan for further growth with key hires in communications and fund development.

Open Forum and Public Comment

Ike Gittlen suggested holding small community meetings where individuals who have completed a program can share their experiences and promote it to others, with a focus on creating an informal, supportive environment. He proposes offering financial incentives to encourage participation.

There was no public comment.

The meeting adjourned at 10:05 am on a motion from Dave Malone.

Executive Committee Minutes from December 5, 2024

Attending: Debra Caplan, Erin Dalton, Laura Ellsworth, Cat McLaughlin, David Malone, Steve Massaro, Jake Wheatley

Absent: Joe Belechak, Darrin Kelly

Staff: Rob Cherry, Kristin Kramer, Brian Kreit, Susie Puskar, Carl Wesley, LaDonna Woods

Other: Dan Hornbake

The meeting was called to order at 8:31 a.m.

Consent Agenda

Consent agenda items included approval of minutes, accepting funds, and approving contracts.

On a motion by Dave Malone, seconded by Debra Caplan, the agenda as presented was approved. There were no abstentions or objections.

Audit and Financial Dashboard Review

Kristin Kramer provided a summary of the audit report for FY 2024 which identified us as low risk. She also walked through the Financial Dashboard Report emphasizing key program expenditures, such as *Learn & Earn* and TANF, are below budget due to delayed invoicing and hiring, while WIOA Adult spending exceeded projections due to early provider invoicing. **On a motion by Laura Ellsworth, seconded by Debra Caplan, the recommendation for approval of the 990 to move to the full board, recommendation for approval of Audit FYE 6/30/2024 to move to the full board, 500K transfer from City Dislocated Worker to City Adult, and 400K transfer from County Dislocated Worker to County Adult were approved. There were no abstentions or objections.**

Learn & Earn and Governance Updates

Debra Caplan summarized the 2024 Learn & Earn Highlights which served youth ages 14 - 24 in both the city and the county. In eleven years, more than 13,500 youth have been served. This year, 1,065 youth were engaged for over 126,000 hours across 248 worksites earning 1.15 million in wages. 85% of these youth completed their full summer commitment, noting better workplace ethics and improvement in their time management. 92% of participants worked in-person, with the other 8% participating virtually. Providers were successful in addressing the barriers of employment and incorporated strategies to assist in keeping the youth present and engaged. The Corporate Learn & Earn Program served those ages 18 - 24 and had a 97% success rate from feedback given by participants. Changes to the 2025 Learn & Earn Program were also reported, including the introduction of a Tiered Model. Participants ages 14 - 15 will focus on work readiness and career exploration. Those ages 16 - 18 will experience more hands-on learning, and those 18 - 24 will have intensive career training including pre-apprenticeships.

Debra Caplan provided Governance Committee updates. They met twice this quarter to review board compliance and the updated Bylaws from the L&I Local Governance Policy. There are 12 current board members who have terms expiring; all have agreed to serve an additional term. Discussions focused on a compliant board with a manageable size and ways to increase board engagement. Ms. Caplan reviewed changes to the Bylaws including a standing committee to oversee all programs since the Youth Committee is no longer a requirement, language clarifying the voting privileges for non-board members on the Executive Committee, the incorporation of language which clarifies review of Executive Meeting minutes and recommendation for proceeding to the full board, and restrictions set forth for agenda items requiring full board approval, and not just by the Executive Committee. **On a motion by Cat McLaughlin, seconded by Laura Ellsworth, the recommendation for approval of bylaws to move to full board was approved without any abstentions or objections. On a motion by Debra**

Caplan, seconded by Cat McLaughlin, the recommendation for approval of the board meeting dates and Exec Committee meeting dates for 2025 to move to full board was approved. There were no abstentions or objections.

Policy Updates

Susie Puskar provided the policy update by introducing an e-voting process for the Executive Committee to address situations where contracts require approval between scheduled meetings. This process allows the committee to review and vote on contracts via email, ensuring timely decisions and the ability to move forward without delays. Members can simply respond with a 'yes' or 'no' to cast their vote.

CEO Update

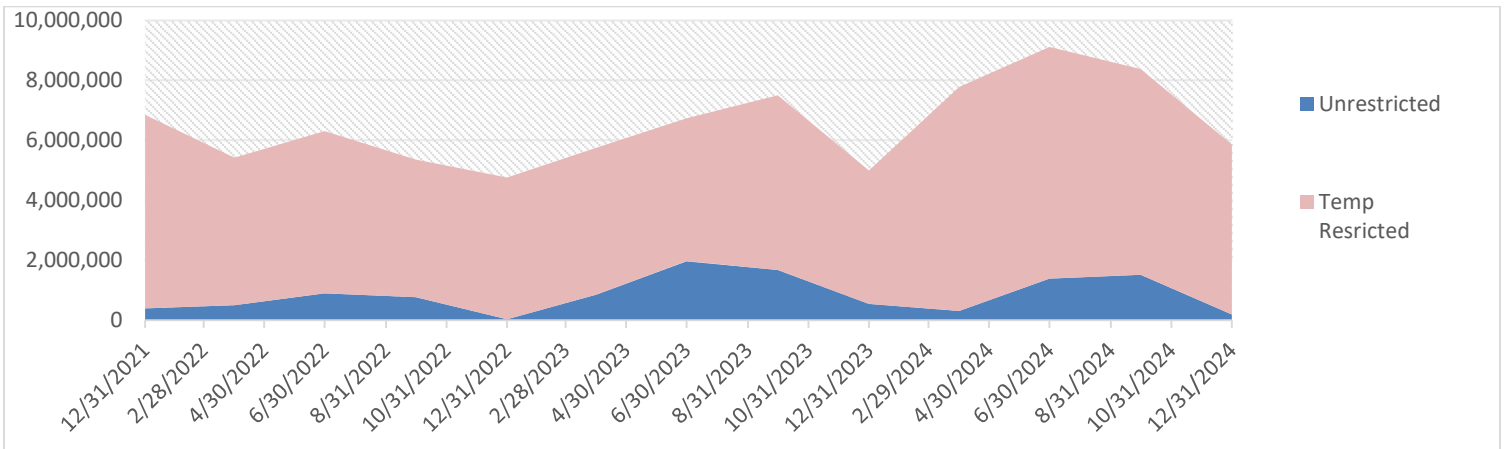
Rob Cherry gave an update on the County Budget passing, including a 1.7 mill property tax increase. This compromise budget will generate funding to address a \$133 million budget shortfall and fully fund essential services like the Department of Human Services. He discussed the transition at the Federal level with an incoming administration. An overview of the WIOA reauthorization bill was given as well as an update on the Initial Finding and Concerns report from our State monitoring, which included zero findings and one area of concern to address.

There was no public comment.

The meeting adjourned at 9:24 a.m.

Dashboard Report

Cash Flow Unrestricted and Temp Restricted Funds



Current Assets, Liabilities & Equity

Cash:

Temp Restricted \$5,678,376
 Unrestricted \$191,338

Total Cash \$5,869,714

Line of Credit *secured by Money*

Market
 \$0 of \$500,000

Other Current

Assets

Prepaid Expenses \$34,953
 Prepaid Insurance \$10,012
 Unbilled Receivable \$33,339
 Security Deposit \$6,067
 Fixed Assets Net of Depreciation \$98,410
 Right of Use Asset – Operating Lease \$1,643,936

Liabilities

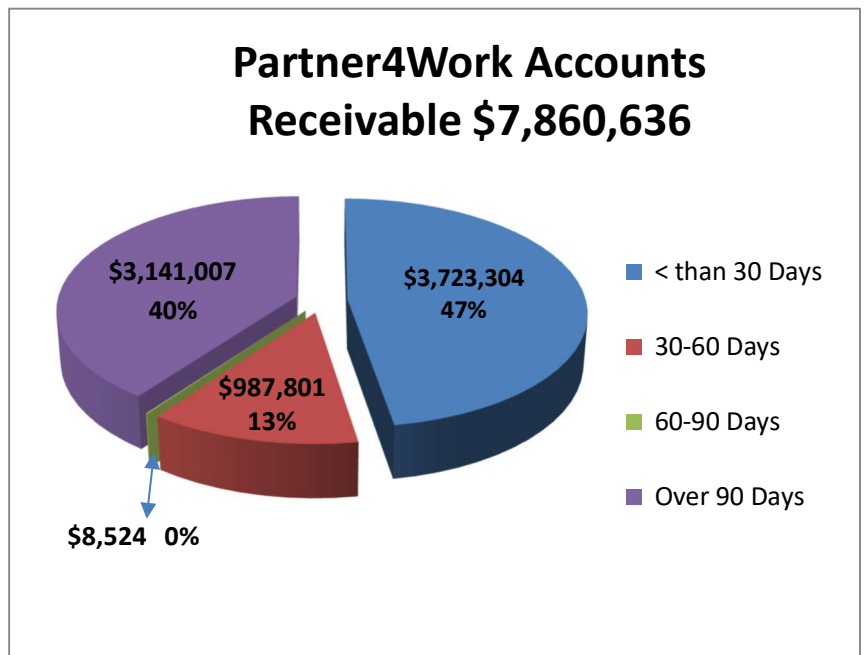
A/P \$5,177,764 (\$5,121,420 due to subrecipients)
 Accrued Vacation/Payroll \$112,766
 Accrued Contract Liability \$0
 Right of Use Liability-Operating Lease (current & long term)\$1,695,505

Equity

Unrestricted Net Assets \$849,305
 Temp Restricted Net Assets \$10,282,423**
 Net Income (\$2,594,035)

**Career Link \$57,701; M&G \$131,660; Sector Strat. \$4,268,842; Adult TANF \$3,509,731; L&E \$2,314,489
 This is reflective of activity through 7/1/2024

Partner4Work Accounts Receivable \$7,860,636

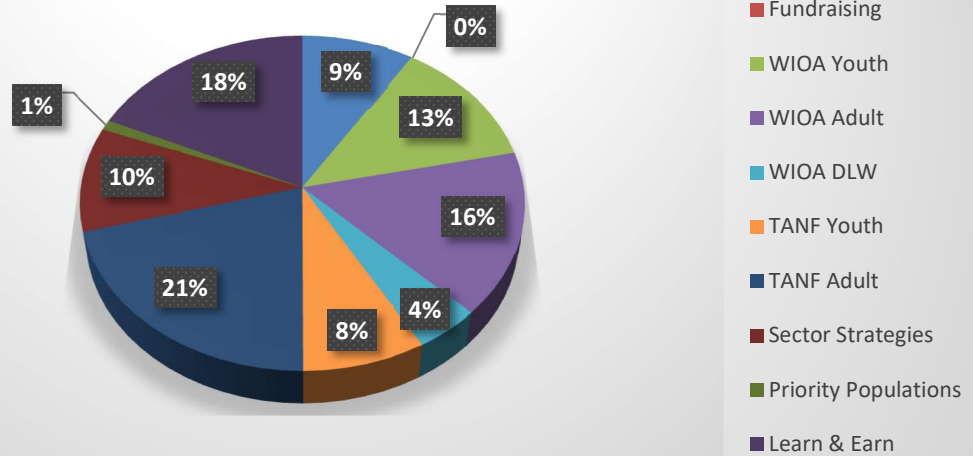


Items over 90+ days: Midwest Urban Strategies \$51,486* ; Dept of Health & Human services \$742,001*
 Neon \$118,421; County of Allegheny \$2,200,000* *marked as paid

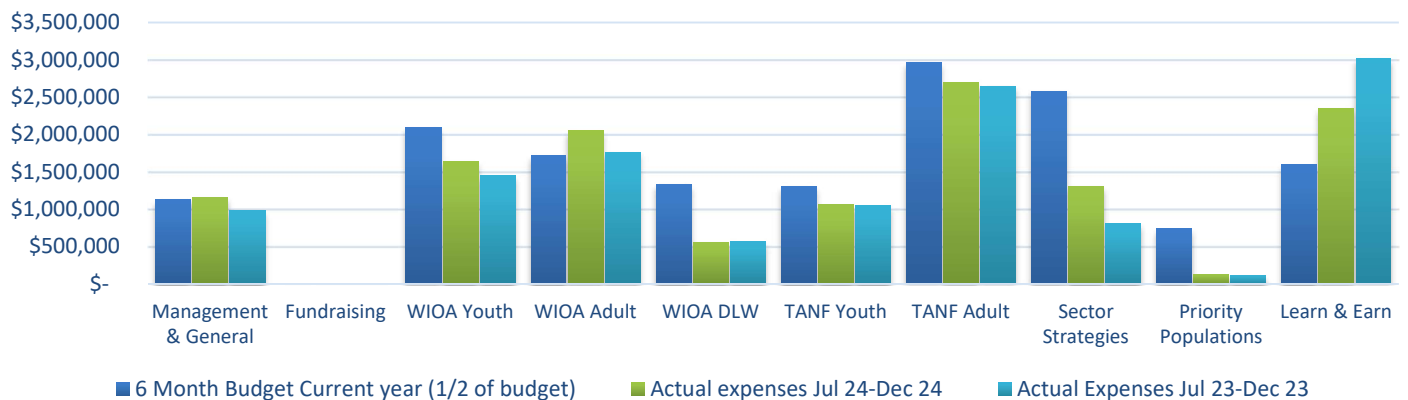
Dashboard Report Continued

Expense section

Total Partner4Work Expenditures \$12,954,501



6 Month Budget and Expense Comparison



Comments

- WIOA Programs:**
 - Youth: \$459K below budget due to typical slow first-half spending. \$181K above prior year.
 - Adult: \$330K above budget from direct program spending and Salary, wages and benefits. \$291K above prior year due direct program spending and positioning CareerLink under Adult/DW funding.
 - Dislocated Worker: \$776K below budget due to typical low DW spending. Proposing DW to Adult shifts to balance programs.
- TANF Youth and Adult:** Below budget due to delays in hiring and direct program expenses. We have filled the TANF Youth role in November 2024.
- Sector Strategies:** \$494K increase from prior year, \$1.2M below budget due to direct program expenses and positions unfilled, two of these positions were filled in November 2024.
- Priority Populations:** In line with prior year and \$608K below budget related to direct program expenses.
- Learn & Earn:** \$668K below prior year and \$745K below budget, due to bulk of expenses for this program happening during the first quarter of the year. We served less youth in 2024 (1,065) vs. 2023 (1,253)
- Financial variances are largely due to program timing, funding adjustments, and staffing allocations. The majority of M&G expense recoupment is expected by year-end, and budget variances will be closely monitored.

**Partner4Work Policy Changes for Board Approval
March 2025**

To ensure alignment with WIOA and additional state and federal requirements, Partner4Work must develop program policies that guide how P4W-funded Adult, Dislocated Worker, and Youth services are delivered in Pittsburgh and Allegheny County. In addition, fiscal and administrative policies, as well as programmatic policies, must be voted on and approved by the Partner4Work Board of Directors prior to local implementation. Partner4Work has drafted the following for approval from the Board:

Policy	Updates
P4W Procurement Policy	<p>Policy Purpose: The purpose of this policy is to establish Partner4Work requirements and standards in all matters related to purchasing, procurement, agreements, contracts, and other forms of commitments, to utilize practices that are transparent, ethical, economical, responsible, and reasonable. To the maximum extent possible, P4W will conduct open and competitive procurement to identify appropriate providers of goods and services and ensure that the number and quality of providers is sufficient to meet the needs of the local area.</p> <p>Recommendation for Board Approval (March 2025):</p> <ul style="list-style-type: none"> ● The policy has been reviewed by the Partner4Work Finance Committee. ● Partner4Work staff recommend board approval of this new policy.
WIOA Adult & Dislocated Worker Eligibility Policy	<p>Policy Purpose: The purpose of this policy is to outline program eligibility and document verification requirements for enrollment in WIOA Youth Adult & Dislocated Worker services.</p> <p>Recommended Changes for Board Approval (March 2025):</p> <ul style="list-style-type: none"> ● Partner4Work staff recommend revising the WIOA Adult & Dislocated policy guide to add a subsection addressing the requirements of secondary eligibility review to align with state guidance. ● Partner4Work staff recommend revising the Self-Certification/Self-Attestation section to align with federal and state guidance on the use of self-attestation/self-certification for WIOA Adult & Dislocated Worker participants. Last resort language will be removed, and the policy will be updated to clarify that self-attestation may be used to verify WIOA Title I eligibility when document collection would delay or prevent a customer from enrollment in a program and moving ahead with services. When readily available or reasonably attainable, other methods of eligibility documentation or verification are to be used in place of self-attestation.
WIOA Youth Eligibility Policy	<p>Policy Purpose: The purpose of this policy is to outline program eligibility and document verification requirements for enrollment in WIOA Youth program services.</p> <p>Recommended Changes for Board Approval (March 2025):</p> <ul style="list-style-type: none"> ● Partner4Work staff recommend revising the WIOA Youth policy guide to add a subsection addressing the requirements of secondary eligibility review to align with state guidance. ● Partner4Work staff recommend revising the Self-Certification/Self-Attestation section to align with federal and state guidance on the use of self-attestation/self-certification for

	<p>WIOA Youth participants. The policy will be updated to clarify that self-attestation may be used to verify WIOA Title I eligibility when document collection would delay or prevent a customer from enrollment in a program and moving ahead with services. When readily available or reasonably attainable, other methods of eligibility documentation or verification are to be used in place of self-attestation.</p>
<p>Partner4Work Right to Know Policy</p>	<p>Policy Purpose: Partner4Work is committed to providing the public with timely access to public records to the fullest extent required by law, in compliance with The Commonwealth of Pennsylvania's Right to Know Law (RTKL), 65 P. S. §§ 67.101-67.3104.</p> <p>Recommended Changes for Board Approval (March 2025):</p> <ul style="list-style-type: none"> ● Partner4Work staff recommend updating the P4W Right to Know policy in compliance with state and federal requirements, emphasizing audience usability. Language will be updated to reflect the most recent state guidance, including further details on the appeal process. The revised policy will also include the newest version of the Office of Open Record's Standard Right-to-Know Law Request Form.
<p>Complaint & Grievance Policy</p>	<p>Policy Purpose: The purpose of this policy is to inform Workforce Innovation and Opportunity Act (WIOA) program participants, staff, and other parties of the procedures for filing a complaint or grievance alleging violations of the WIOA Title I Program and/or other WIOA-related policies and regulations. Complaints or grievances related to the services and activities of the WIOA one-stop operator must adhere to this policy as well.</p> <p>Recommended Changes for Board Approval (March 2025):</p> <ul style="list-style-type: none"> ● Partner4Work staff recommend adding a section clarifying the types of circumstances for which a formal complaint/grievance may be submitted to Partner4Work. ● Partner4Work staff recommend adding language requiring providers to have mechanisms in place for receiving and responding to general customer feedback for which a formal complaint to Partner4Work may not be warranted.

PROCUREMENT POLICY

Effective Date: March 12, 2025

1. Purpose and Background 2

2. Definitions 3

3. Policy Exceptions 6

4. General Procurement Standards..... 6

5. Requirements Development 8

6. Price and Cost Estimation..... 8

7. Methods of Procurement..... 8

8. Written Solicitations..... 11

9. Advertisement 11

10. Approval and Authority 11

11. Questions and Bidder Conferences 12

12. Evaluation and Selection 12

13. Contract Cost and Price 13

14. Procurement Risk and Bidder Responsibility 14

15. Subrecipient and Contractor Determinations 15

16. Monitoring..... 15

17. Required Contract Provisions..... 15

18. Notification to Bidders 16

19. Written Contracts and Agreements 16

20. Procurement Review 16

21. Procurement Documentation 16

22. Property Standards..... 17

23. Debriefing and Protest Process 18

24. WIOA-Specific Procurement Requirements..... 19

APPENDIX I - Summary of Requirement Variations and Thresholds 21

1. **Purpose and Background**

It is the policy of TRWIB Inc., dba Partner4Work (“P4W”), in all matters related to purchasing, procurement, agreements, contracts, and other forms of commitments, to utilize practices that are transparent, ethical, economical, responsible, and reasonable. To the maximum extent possible, P4W will conduct open and competitive procurement to identify appropriate providers of goods and services and ensure that the number and quality of providers is sufficient to meet the needs of the local area.

Scope - Publicly Funded Procurements

This policy applies to all P4W procurement activity that is fully or partially conducted with public funding, unless otherwise specified herein, or an exception is granted in accordance with the process defined herein. P4W employees, and representatives who have been given express authorization related to procurement, must follow this policy. This policy may also apply fully or partially to organizations receiving public funding from P4W that are classified as “subrecipients” of such public funding.

Scope Exception - Privately Funded Procurements

This policy does not apply to P4W procurement activity that is *fully* conducted with private funding, unless specified herein, as such funding is often intended to support new or emerging programs, services, or ideas that require greater flexibility. Although not required, P4W may consider use of the standards and practices in this policy when using private funding to create transparency, fairness, efficiency, and competition, when appropriate. Private funding sources may also have additional requirements, which P4W must become familiar with and adhere to.

As an agency that frequently handles various federal and state funds, P4W has developed this procurement policy in adherence with mandated rules, regulations, and standards governing the use of public funding, including but limited to those listed below, to control purchases of goods and services and to encourage maximum levels of competition.

- [Procurement Standards of the Uniform Guidance](#)
 - 2 CFR Part 200 Subpart D - Procurement Standards
- [PA Department of Labor and Industry Workforce System Policies](#) (WSP)
 - PA Department of Labor and Industry Financial Management Guide
- [Workforce Innovation and Opportunity Act](#) (WIOA)

In the event of a conflict between this policy and any mandated rules, regulations, and standards applicable to procurement activity that P4W is conducting, the mandated rules, regulations, and standards will supersede.

P4W also recognizes that some procurements must follow additional rules and regulations, whether mentioned in this policy or not, that may be specific to funding sources, governing laws, public agencies, or other sources of authority. This policy references such authorities to indicate the applicability of specific standards, as is the case with procurement using WIOA funding.

2. Definitions

Award: A formal determination that a bid, proposal, or quote has been accepted by the soliciting entity. In the context of this policy, an award made by P4W through the procurement process may be contingent upon P4W obtaining full approval for a contract or agreement, and upon successful negotiation and execution of a contract or agreement.

Bid: A formal document submitted by a bidder in response to an Invitation for Bids (IFB) under sealed bidding procurement methods (see Formal Procurement Methods described in the Methods of Procurement section of this policy). P4W does not anticipate utilizing bids and IFBs on a normal basis.

Bidder: For purposes of this policy, a bidder is any entity that responds to a solicitation. The term bidder is used in reference to multiple forms of solicitation herein, including a Request for Quotes (RFQ), Request for Proposals (RFP), an Invitation for Bids (IFB), and other forms of solicitation.

Contract: A mutually binding legal relationship obligating the seller to furnish the goods or services (including construction) and the buyer to pay for them. For purposes of this policy, it includes all types of commitments that obligate P4W to expenditure of funds, and that, except as otherwise authorized, are in writing. This policy makes an important distinction between the terms “contract” and “subrecipient agreement,” which is defined further below.

Contractor: An entity that receives a contract as defined in “Contract” above.

Cost Analysis: The review and evaluation of any separate cost elements and profit or fee in a bid, proposal, or quote, as needed to determine a fair and reasonable price or to determine cost realism, and the application of judgment to determine how well the proposed costs represent what the cost of the contract agreement should be, assuming reasonable economy and efficiency.

Equipment: Tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds the lesser of the capitalization level established by P4W for financial statement purposes or levels set by other governing authorities.

Federal or State Awarding Agency: A federal or state agency that provides an award of public funding directly to a non-federal or non-state entity.

Financial Management Guide (FMG) - PA Department of Labor and Industry: A Workforce System Policy (WSP) of the PA Department of Labor and Industry, with related guidance, that provides administrative and financial direction to workforce system stakeholders.

Goods: Supplies, materials, equipment, and all other tangible commodities, except real property.

Intangible Property: Property having no physical existence, such as trademarks, copyrights, patents and patent applications and property, such as loans, notes and other debt instruments, lease agreements, stock and other instruments of property ownership (whether the property is tangible or intangible).

Intellectual Property (IP): A type of intangible property encompassing the products of original human thought. IP is protected in law by, for example, patents, copyright, and trademarks, which enable people to earn recognition or financial benefit from what they invent or create.

Invitation for Bids (IFB): A type of solicitation used when competitive bids are sought (see Formal Procurement Methods described in the Methods of Procurement section of this policy) to communicate requirements to prospective bidders and to solicit bids. P4W does not anticipate utilizing IFBs on a normal basis.

Micro-Purchase: An acquisition of goods or services using informal procurement methods, the aggregate amount of which does not exceed the micro-purchase threshold, which is defined in this section (see Procurement Thresholds definition).

Noncompetitive Procurement: Procurement through solicitation of bids, proposals, or quotes from only one source. Also referred to as sole source procurement.

P4W: Partner4Work

Pass-Through Entity: A non-public entity that provides a subaward to a subrecipient to carry out part of a public program. P4W acts as a pass-through entity in many procurement situations.

Price Analysis: The process of examining and evaluating a proposed price without evaluating its separate cost elements and proposed profit. Methods for conducting price analysis include but are not limited to:

1. Comparing proposed prices received in response to solicitation; and
2. Comparing proposed prices to historical prices paid, competitive published price lists, independent cost estimates, or prices obtained through market research.

Private Funding: Funding that comes from non-governmental sources, such as individuals, corporations, or foundations, typically provided by entities outside of the public sector.

Procurement: The process of acquiring goods and services that involves locating, purchasing, and obtaining the goods, services, or works to be procured. This policy uses “procurement” to refer to a process, in general, and to specific procurement efforts and activities taken by P4W.

Property: Refers to real property or personal property. See definitions of equipment, intangible property, intellectual property, and supplies elsewhere in this section.

- Real Property: Land, including land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment.

- **Personal Property:** Property other than real property. It may be tangible, having physical existence, or intangible.

Proposal: A formal document submitted by a bidder that details how the bidder would fulfill the specific requirements of a Request for Proposals (RFP), if selected. Proposals are typically more detailed than quotes, often including proposed deliverables, scope, methodology, personnel qualifications, references, past performance information, timeline, price and cost descriptions.

Public Funding: Funding that comes from a federal, state, or publicly funded agency.

Quote: A formal document submitted by a bidder that outlines the pricing or costs of goods or services. Quotes may also include the timeline and scope of a project or program, as well as the terms and conditions for a potential contract or agreement. Quotes are typically less detailed than proposals.

Procurement Thresholds: Dollar amounts defined by this policy and governing regulations that determine which procurement methods may be used (see Methods of Procurement section of this policy).

- **Micro-Purchase Threshold (MPT):** The effective MPT for this policy is \$10,000. Micro-purchase procurement methods may be used for procurements that are not expected to meet or exceed the MPT in aggregate value. Exceptions to the MPT include the following:
 - Procurement governed by the PA Department of Labor and Industry Financial Management Guide, which includes but may not be limited to procurements funded by WIOA; the effective MPT set by the Financial Management Guide is \$3,000; or
 - Procurements where superseding thresholds apply that are set by applicable rules, regulations, or other sources of authority.
- **Simplified Acquisition Threshold (SAT):** The effective SAT for this policy is \$100,000, unless superseding thresholds apply that are set by applicable rules, regulations, or other sources of authority. Small purchase procurement methods may be used for procurements that are not expected to meet or exceed the SAT in aggregate value.

RFP (Request for Proposals): A type of solicitation used when competitive proposals are sought (see Formal Procurement Methods described in the Methods of Procurement section of this policy) to communicate requirements to prospective bidders and to solicit proposals.

RFQ (Request for Quote): A type of solicitation used when competitive quotes are sought (see Informal Procurement Methods described in the Methods of Procurement section of this policy) to communicate requirements to prospective bidders and to solicit quotes.

Services: A service directly engages the time and effort of a contractor, subrecipient, or other party for the primary purpose of performing an identifiable task rather than furnishing an end item of supply.

Small Purchase: An acquisition of goods or services using informal procurement methods, the aggregate amount of which does not exceed the simplified acquisition threshold (SAT), which is defined in this section (see Procurement Thresholds definition).

Solicitation: Any request to solicit bids, proposals, or quotes, including but not limited to an IFB, RFP, or RFQ. Solicitations may be formal or informal, written or oral, depending on the circumstances and rules and regulations applicable to the procurement.

Subaward: An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of an award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a public program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Subrecipient: An entity that receives a subaward from a pass-through entity to carry out part of a public program, but does not include an individual that is a beneficiary of such a program. A subrecipient may also be a recipient of other awards of public funding directly from a public awarding agency.

Subrecipient Agreement: An agreement between an award recipient and a third party, called a subrecipient, to perform a portion of a project or program. The subrecipient's work is usually a substantive contribution or collaborative effort that helps the award recipient meet the project's objectives and directly benefits the public.

Supply: All tangible personal property other than those described in the equipment definition. A computing device is a supply if the acquisition cost is below the lesser of the capitalization level established by P4W for financial statement purposes or levels set by other governing authorities, regardless of the length of its useful life.

TANF: Temporary Assistance for Needy Families.

WIOA: Workforce Innovation and Opportunity Act.

3. Policy Exceptions

Under limited circumstances, P4W may grant exceptions to requirements within this policy. Requests for exceptions may be submitted using the Policy Exception Form available at www.partner4work.org. Exception requests will be reviewed based on their allowability under any applicable legislation, regulation, and policy. P4W cannot grant exceptions to requirements of superseding authorities. Partner4Work will also consider anticipated benefits and risks, reasonability, funding availability, how an exception will lead to improved outcomes for the customer(s) being served, and other relevant factors.

4. General Procurement Standards

a. Conflicts of Interest

P4W will maintain written standards of conduct covering conflicts of interest and governing the actions of its employees or representatives engaged in the selection, award, and administration of all contracts or agreements.

b. Economical Procedures

In all procurement activities, P4W will strive to follow economical procedures, avoid unnecessary or duplicative purchases, and promote cost-effective practices. P4W will encourage participation in cooperative purchasing agreements, when appropriate and in the best interests of P4W.

c. Competition

Regardless of procurement method, P4W will conduct all procurement activities in a manner that provides for full and open competition, unless otherwise specified herein.

Restrictive Factors. P4W will avoid situations considered to be restrictive of competition, including:

1. Placing unreasonable requirements on firms in order for them to qualify to do business;
2. Requiring unnecessary experience and excessive bonding;
3. Noncompetitive pricing practices between firms or between affiliated companies;
4. Noncompetitive contracts to consultants that are on retainer contracts;
5. Organizational conflicts of interest;
6. Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement; and
7. Any arbitrary action in the procurement process.

d. Splitting

Purchases must not be broken down or divided into smaller components to avoid the requirements of this policy or any other applicable rules or regulations.

e. Handling Proposal Materials and Information

P4W recognizes and values the need for integrity, professionalism, and confidentiality in the procurement process. P4W will carefully handle and safeguard information and materials related to bids, proposals, or quotes to the maximum extent possible, while understanding that such information may be subject to the Freedom of Information Act, Right to Know Law, or other applicable legislation.

f. Non-Discrimination

P4W will not discriminate in the procurement and award process against any bidder because of race, color, religion, national origin, political affiliation, sexual preference, gender identity, age, or sex. In conducting procurement, employees of P4W, or authorized representatives thereof, will follow all rules and regulations governing non-discrimination, including internal policies and other sources of guidance.

Any entity receiving funds from P4W must maintain equal opportunity and non-discrimination policies that comply with their grant or contract requirements and all rules and regulations governing matters related to equal opportunity and non-discrimination.

g. Whistleblower/No Retaliation

P4W maintains a policy to protect whistleblowers. Employees may report suspected violations of procurement policies, regulations, or conflicts of interest internally or to external agencies such as the PA Office of the Inspector General or the PA Office of the Attorney General.

h. The Stevens Amendment

The Stevens Amendment requires grantees, including pass-through entities, of the US Department of Labor (DOL), Department of Health and Human Services (HHS), and Department of Education (ED) to include a federal grant funding disclosure statement when communicating about projects or programs that are federally financed in whole or in part. As an entity that administers various federal employment and training programs and issues related subawards, P4W will adhere to requirements of The Stevens Amendment whenever applicable.

5. Requirements Development

In planning and preparing for all procurements, P4W will develop a clear and accurate description of the requirements for the goods or services needed, and incorporate the description in solicitations, as necessary and appropriate. Such a description must not, in competitive procurements, contain features which unduly restrict competition.

6. Price and Cost Estimation

Procurement methods and related activities are often driven by the expected price or cost of the goods or services needed, among other factors. Once the need for procurement has been identified, P4W must take steps to collect price and cost information relevant to the requirement and use such information to create an independent price or cost estimate, reflective of the total potential value of the procurement.

All procurements expected to meet or exceed the simplified acquisition threshold (SAT) in aggregate value require a written price or cost estimate. The form, level of detail, and complexity of the estimate should be commensurate with the requirement.

7. Methods of Procurement

In conducting any form of purchasing, P4W must select the method of procurement to be used, which is generally determined by the procurement's estimated aggregate value, the type of goods or services being purchased, the source of funding, and other known or reasonably expected characteristics.

a. Informal Procurement Methods

When a procurement is not expected to exceed the simplified acquisition threshold (SAT), as defined in

the Definitions section of this policy, P4W may use informal procurement methods to expedite completion of transactions and minimize associated administrative burden and cost.

i. Micro-Purchases

Procurement by micro-purchase is the acquisition of goods or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (MPT), as defined in the Definitions section of this policy. To the extent practicable, P4W will distribute micro-purchases equitably among qualified suppliers and vendors. Micro-purchases may be awarded without soliciting competitive price or rate quotes if P4W considers the price to be reasonable based on research, experience, purchase history, or other information.

ii. Small Purchases

Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that may be used when the aggregate value of a procurement effort is expected to exceed the MPT, but not exceed the simplified acquisition threshold (SAT), as defined in the Definitions section of this policy.

When small purchase procedures are used, P4W must obtain proposals or quotes from an adequate number of qualified sources to ensure competition and reasonable pricing, which may or may not include use of a written solicitation and formal advertisement. For small purchases that are not advertised, a minimum of two proposals or quotes must be obtained for competition to be determined adequate, although P4W encourages the practice of obtaining at least three proposals or quotes. Small purchase solicitations that are advertised may proceed when only one proposal or quote is received, if all other competition requirements have been met (i.e., a competitive environment was effectively created).

b. Formal Procurement Methods

When a given procurement is expected to exceed the simplified acquisition threshold (SAT), as defined in the Definitions section of this policy, P4W will utilize formal procurement methods, which will include either sealed bids or proposals.

i. Sealed bids

The method of sealed bidding includes publicly soliciting a firm fixed price contract with an award to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. Sealed bidding is generally used when the following conditions are present:

1. A complete, adequate, and realistic specification or purchase description is available;
2. Two or more responsible bidders are willing and able to compete effectively; and
3. The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

If sealed bids are used, the requirements of [2 CFR 200.320\(b\)\(1\)](#) must be followed and bids must be solicited using a written Invitation for Bids (IFB) document approved by P4W.

P4W does not expect to utilize sealed bidding on a regular basis, given the nature of P4W's business, as the conditions for using sealed bidding are unlikely to be present in most situations.

ii. Proposals

The method of competitive proposals is generally used when conditions are not appropriate for the use of sealed bids. This method is normally conducted with more than one source submitting a proposal, and either a fixed price or cost-reimbursement type contract award.

If the method of competitive proposals is used, the following requirements apply, in addition to those established elsewhere in this policy:

1. Proposals must be solicited using a written Request for Proposals (RFP) document approved by P4W;
2. Proposals must be received from an adequate number of qualified sources in response to an RFP; to ensure competition and reasonable pricing, P4W encourages the practice of obtaining at least three proposals; however, RFPs receiving only one proposal may proceed if all other competition requirements have been met (i.e., a competitive environment was effectively created);
3. Any complete response to an RFP must be considered to the maximum extent practical; and
4. Proposals will be selected from responsible bidders only, whose proposals are most advantageous to P4W, with price and other factors considered.

c. Noncompetitive Procurement (Sole Source)

Noncompetitive procurement is procurement through solicitation of a bid, proposal, or quote from only one source. Also referred to as sole source procurement. Noncompetitive procurement may be used only when one or more of the following circumstances apply:

1. The aggregate dollar amount of the procurement does not exceed the micro-purchase threshold (MPT);
2. The item is available only from a single source;
3. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
4. The Federal or State awarding agency or pass-through entity expressly authorizes noncompetitive procurement in response to a written request from P4W; or
5. After solicitation of a number of sources, competition is determined inadequate.

Noncompetitive Procurement Documentation and Approval

To proceed with a non-competitive procurement that exceeds the MPT, a written justification must be prepared and approved by an officer-level employee of P4W.

8. Written Solicitations

When a written solicitation is required for a procurement, as defined in this policy (see Methods of Procurement), an approved P4W template must be used. P4W will make solicitation templates available for employees to use when needed, which may include but is not limited to a Request for Quotes (RFQ), a Request for Proposals (RFP), and an Invitation for Bids (IFB).

In certain circumstances, P4W may solicit information or interest by issuing a Request for Information or a Request for Interest (both known as RFI), the general purpose of which is to gather information for planning purposes or provide an opportunity for interested parties to express interest.

9. Advertisement

Procurements meeting the below criteria require public advertising unless noncompetitive procurement methods can be used, as specified in this policy.

- Procurements that meet or exceed the simplified acquisition threshold (SAT) in aggregate value must be advertised on the P4W website and in one additional public-facing location for at least 30 days. P4W encourages further advertisement, and for longer periods of time, when needed in order to achieve a more effective, full, and open level of competition.
- Procurements below the SAT in aggregate value are not required to be advertised, although P4W may choose to do so.

10. Approval and Authority

Approval is required during the procurement process at multiple stages and from multiple authorities, depending on the method of procurement, aggregate value, nature of the goods or services to be procured, and other relevant factors. Approval must be documented for all procurements.

Any award, contract, or agreement, without regard to the dollar amount or funding source, that directly benefits a P4W board member, a former board member, or former employee, must be approved by the P4W Executive Committee.

a. Approval for Micro-Purchases

The approval process for micro-purchases will be conducted using P4W's web-purchasing system (i.e., Blackbaud).

b. Approval Before Solicitation (above the MPT)

For all procurements that meet or exceed the micro-purchase threshold (MPT) in aggregate value, approval must be obtained by an officer-level employee of P4W before bids, proposals, or quotes are solicited. Officer-level employees may delegate pre-solicitation approval authority; however, such delegation must be made expressly in writing. At its discretion, P4W may choose to request pre-solicitation approval from the P4W Executive Committee, its Board of Directors, or any other committee

thereof, although such approval is not required.

c. Approval of Awards, Contracts, and Agreements

When P4W is ready to select bids, proposals, or quotes through the procurement process and move forward with related awards, contracts, or agreements, the following approvals must be obtained.

i. Selection of Bids, Proposals, or Quotes

For procurements that meet or exceed the MPT in aggregate value, the selection of bids, proposals, or quotes for award must be approved by an officer-level employee of P4W.

ii. Approval for Contracts and Contract Amendments

Any contract or agreement that meets or exceeds \$100,000 in total potential value, considering all base and optional renewal components, must be approved by the P4W Executive Committee. Any amendment to an existing contract or agreement that creates an increase in value of \$50,000 or more must be approved by the Board Chair. Contracts, agreements, or changes thereto that meet these criteria may not be finalized until approval is received. Approval by the P4W Executive Committee or Board Chair is not required for contracts, agreements, or amendments below the thresholds established above, although it may be sought.

For procurements using only private funds, approval from the P4W Executive Committee is required for contracts or agreements that meet or exceed \$250,000 in potential value. Any amendment to an existing privately funded contract or agreement that creates an increase in value of \$50,000 or more must be approved by the Board Chair.

11. Questions and Bidder Conferences

P4W will strive to provide opportunities for interested parties to submit questions regarding specific procurements and answer questions in a timely manner that promotes fairness, transparency, and competition.

In certain circumstances, P4W may conduct a bidder's conference, as a way to provide information about a procurement to interested parties or prospective bidders. Typically, P4W will conduct a bidder's conference when a procurement is complex or involves complicated specifications and requirements. When a bidder's conference is conducted, attendance may or may not be a requirement to submit a bid, proposal, or quote.

12. Evaluation and Selection

In conducting procurement, P4W will select bids, proposals, or quotes that present the best value to and are in the best interests of P4W, given P4W's requirements, goals, and overall mission. For all purchases, regardless of procurement method or funding source, P4W must develop and utilize evaluation criteria to support sound selection decisions and ensure that bids, proposals, or quotes will meet P4W requirements.

a. Procurements Above the Simplified Acquisition Threshold (SAT)

For procurements that meet or exceed the simplified acquisition threshold (SAT) in aggregate value, the

following evaluation and selection requirements must be followed:

1. Written evaluation and selection criteria must be created before the solicitation is issued;
2. A summary of the evaluation and selection criteria must be clearly described in the solicitation, along with the relative importance of the criteria;
3. The strengths, deficiencies, significant weaknesses, and risks supporting evaluation of bids, proposals, or quotes must be documented;
4. A team of evaluators must be selected to carry out the evaluation process;
 - The size of the team should be commensurate with the characteristics of the procurement, but not less than three;
 - Evaluators should be selected based on expertise and experience, as it relates to the procurement, considering the requirements, context, and other relevant factors;
 - Evaluators external to P4W may be selected, as needed and at P4W's discretion; and
5. All evaluators must acknowledge and follow P4W conflict of interest and confidentiality guidelines;
 - Any evaluator with a conflict of interest will be excluded from evaluating one or more proposals, depending on the nature of the conflict.

b. Potential Evaluation Factors

Potential evaluation factors include, but are not limited to:

1. Price or cost;
2. Past performance and experience of the organization, in general, and related to specific contracts, agreements, or other efforts; in most cases, references should be requested;
3. Organizational capacity and alignment with requirements;
4. Administrative and fiscal capacity;
5. Adequacy of the proposed methodology and sub-factors thereof, including, but not limited to:
 - a. Description of the goods or services to be procured;
 - b. Staffing plan and qualifications of personnel;
 - c. Performance goals and outcomes;
 - d. Time required to deliver the goods or services to be procured;
6. Geography or location related to bidders or proposed services;
7. Compliance with the requirements and standards of the solicitation and any other applicable rules or regulations;
8. Level and type of risk.

c. Communication with Bidders

After responses have been received and during the scoring, evaluation, and selection phase, P4W may engage in discussions or negotiations with bidders, request presentations, conduct site visits, or use other forms of engagement to thoroughly assess a bidder's qualifications, likelihood of success, and capacity to meet the procurement requirements. These interactions may also help ensure that proposed prices or costs are fair and reasonable.

13. Contract Cost and Price

P4W has the responsibility to ensure that the price or cost of all purchases and related contracts is fair and

reasonable. As such, consideration of price and cost-related factors is required for all procurements.

P4W will perform price analysis for all purchases; however, the method and degree of analysis will depend on the facts surrounding the particular procurement situation.

For any potential contract or agreement expected to exceed \$100,000 in total potential value, considering all base and optional renewal components, P4W will produce a written price or cost analysis. For potential contracts or agreements below the threshold identified above, only basic price analysis is required, unless circumstances warrant more thorough price or cost analysis to determine fair and reasonable pricing. Price and cost estimates completed before solicitation (see Price and Cost Estimation section) should be used to facilitate effective contract price and cost analysis.

Where applicable, P4W will negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where cost analysis is performed. To establish a fair and reasonable profit, consideration will be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

14. Procurement Risk and Bidder Responsibility

P4W recognizes its duty to identify and manage risks related to procurement and determine that potential contractors or subrecipients are responsible, ensuring that such parties have the means and ability to meet the requirements of the contract or agreement.

a. Assessment and Management of Risk

Prior to entering into any contract or agreement, P4W will identify and analyze potential risks and related implications. Reasonable risk taking is appropriate as long as risks are controlled and mitigated.

Types of risk may include schedule risk, performance risk, technical feasibility, cost risk, risk implicit in a particular contract type, duplication of or dependencies between a new project or program and other projects or programs, the number of simultaneous high-risk projects or programs to be monitored, funding availability, and program management risk. Appropriate techniques should be applied to manage and mitigate risk during the acquisition and contract administration process.

b. Responsibility Determination

Before P4W can make an award and execute a contract or agreement, it must ensure that the contractor or subrecipient is responsible. A responsibility determination signifies that P4W has judged the contractor or subrecipient to have the means and ability to complete the contract in question. In making such a determination, P4W may consider whether the contractor or subrecipient:

- Has adequate financial resources to perform the contract or agreement, or the ability to obtain them;
- Is able to comply with the required or proposed delivery or performance schedule;

- Has a satisfactory performance record;
- Has a satisfactory record of integrity and business ethics;
- Has the necessary organization, experience, accounting and operational controls, and technical skills, or the ability to obtain them;
- Has the necessary production, construction, and technical equipment and facilities, or the ability to obtain them; and
- Is otherwise qualified and eligible to receive an award under applicable laws and regulations.

c. Suspension and Debarment

P4W will follow all applicable regulations that restrict awards, subawards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in federal or state assistance programs or activities.

15. Subrecipient and Contractor Determinations

P4W will make a case-by-case determination whether each agreement it makes for the disbursement of public funding casts the party receiving the funding in the role of a subrecipient or a contractor (see Subrecipient and Contractor in the Definitions section of this policy). Accordingly, P4W will use judgment in classifying each agreement as a subaward or a procurement contract.

Characteristics that support the designation of an entity as a subrecipient include when the entity:

- Determines who is eligible to receive public assistance;
- Has its performance measured in relation to objectives of a public program;
- Has responsibility for programmatic decision making;
- Is responsible for adherence to applicable public program requirements; and
- In accordance with its agreement, uses public funding to carry out a program for a public purpose specified in an authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

16. Monitoring

P4W will apply the Monitoring and Management Standards of [2 CFR Part 200 Subpart D](#) to all agreements designated as subrecipient agreements using public funding. P4W may also apply the same or similar standards to monitor other types of contracts or agreements, as it deems appropriate.

The purpose of monitoring subrecipient activities is to ensure that the subaward is used for authorized purposes, the subrecipient is in compliance with applicable rules and regulations and the terms and conditions of the subaward, and that subaward performance goals are achieved.

Depending on the requirements of specific funding sources, P4W may utilize additional monitoring standards in managing subrecipient agreements, as applicable.

17. Required Contract Provisions

P4W will maintain and utilize templates for contracts and agreements containing provisions that adhere to applicable regulations and standards.

P4W recognizes the requirements of [2 CFR 200.327 - Contract Provisions](#), including Appendix II to Part 200, and will ensure all contracts made by P4W include provisions addressing the requirements therein where required.

P4W also recognizes that additional contract provisions may be required under specific awards of public funding, and in such cases, P4W will ensure that related contracts contain the proper provisions.

18. Notification to Bidders

P4W will strive to notify bidders of procurement results in a timely manner. For all advertised procurements, P4W will send notification of results to all bidders no later than two weeks after obtaining approval for resulting contracts and agreements. P4W may choose to send notification of results before obtaining such approval, depending on the circumstances. P4W is not required to notify bidders of results for procurements that are not advertised, although it may choose to do so.

19. Written Contracts and Agreements

P4W will ensure written contracts are utilized for all transactions or agreements that exceed the micro-purchase threshold (MPT). P4W may also utilize written contracts for transactions or agreements that do not exceed the MPT when it is appropriate to do so. P4W will maintain templates for subrecipient agreements, vendor agreements, and other forms of agreement, as needed, to be used when a written contract is required. Permission to use an agreement or contract template not provided by P4W must be granted by an officer-level employee of P4W.

20. Procurement Review

P4W will make available, upon request by a Federal or State awarding agency or pass-through entity, technical specifications on proposed procurements where the Federal or State awarding agency or pass-through entity believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition. P4W will make available upon request, for the Federal or State awarding agency or pass-through entity pre-procurement review, procurement documents, such as RFQs, RFPs, or IFBs, or independent cost estimates, when so required.

21. Procurement Documentation

P4W will maintain records and files for all procurement activities, documenting adherence to the requirements of this policy and any applicable rules and regulations. Procurement documents will be retained according to the record retention requirements of governing regulations and related P4W policies and practices. Specific documentation requirements will depend on the procurement methodology used, the nature of goods or services procured, rules and regulations applicable to the procurement, and other relevant factors.

At a minimum, procurements that meet or exceed the micro-purchase threshold (MPT) in aggregate value must document the following:

1. Description of goods or services procured;
2. Basis for selection of bids, proposals, or quotes; and
3. Required approvals for procurement and award.

Additional records and files that may be needed to meet documentation requirements include but are not limited to the following:

1. Evidence of availability of funds;
2. Any approved exceptions to this policy;
3. A list of sources solicited;
4. Estimate of contract price or cost;
5. Proof of advertisement/publication;
6. Description of attempts to identify potential bidders;
7. Relevant market research;
8. A copy of the solicitation and all amendments, appendices, and other supporting documents;
9. Bidder's conference publication, agenda, materials distributed or displayed, and minutes;
10. Questions or requests for information submitted by interested parties;
11. A copy of each bid, proposal, or quote received;
12. Any required bidder representations and certifications;
13. Materials related to evaluation of bids, proposals, or quotes;
14. Materials related to bidder presentations, or discussions and negotiations with bidders;
15. Evidence of compliance with conflict of interest requirements for all evaluators;
16. Source selection documentation;
17. Evaluation of risk;
18. Memo to document the history of the procurement, award recommendations, and basis thereof;
19. Justification and approval for use of noncompetitive procurement methods;
20. Notification of procurement results to bidders;
21. Documentation from successful bidders needed to execute contracts or agreements; and
22. Materials related to bidder debriefing.

22. Property Standards

P4W recognizes its responsibility to adhere to all applicable rules and regulations related to procurement and management of property purchased or leased with public funds, including but not limited to real property, equipment, supplies, intellectual property, and other forms of tangible and intangible property.

P4W will adhere to the Property Standards contained in the Uniform Guidance ([2 CFR Part 200 Subpart D - Property Standards](#)) and any other rules and regulations that govern the purchase and management of property.

P4W will also adhere to standards contained in the [PA Department of Labor and Industry Financial Management Guide](#) that further control the purchase and management of property and equipment, as applicable, including but not limited to lower procurement thresholds, advance approval, insurance, and disposition.

Where appropriate, an analysis will be made of lease and purchase alternatives to determine which would be the most economical and practical approach to procurement.

23. Debriefing and Protest Process

Bidders who have submitted a bid, proposal, or quote in response to a solicitation issued by P4W may request a debriefing related to the procurement, once the bidder notification process has been completed, as described in this policy. Bidders may also choose to initiate a protest regarding the outcome of the procurement.

a. Bidder Debriefing

Upon request, P4W may provide debriefing to bidders who have submitted a bid, proposal, or quote in response to a solicitation issued by P4W. Requests must be submitted to P4W in writing within one week after the bidder has received notification of the result related to their specific bid, proposal, or quote. P4W may consider late requests, but is not required to do so.

To the maximum extent practicable, P4W will provide the debriefing within a reasonable period of time after receiving the written request, as determined by P4W; however, P4W may choose to delay the debriefing, based on the circumstances of the procurement. Debriefings may be done orally, in writing, or by any other method acceptable to P4W.

P4W may use its discretion in determining the type of information and level of detail provided during debriefing. In most cases, P4W will provide basic information related to its rationale for award decisions, in general, and the strengths, weaknesses, and scoring of the bidder's specific bid, proposal, or quote. P4W may also provide reasonable responses to relevant questions about whether evaluation and source selection procedures contained in the solicitation, applicable regulations, and other applicable authorities were followed.

Debriefing will not include point-by-point comparisons of the debriefed bidder's specific bid, proposal, or quote with those of other bidders. Also, the debriefing will not reveal any information prohibited from disclosure or exempt from release under the Freedom of Information Act (5 USC 552) or Pennsylvania's Right-to-Know Law, including but not limited to:

- Trade secrets;
- Privileged or confidential manufacturing processes and techniques;
- Commercial and financial information that is privileged or confidential, including cost breakdowns, profit, indirect cost rates, and similar information; and
- The names of individuals providing reference information about a bidder's past performance.

b. Protests

A bidder who has submitted a bid, proposal, or quote in response to a solicitation issued by P4W may protest the outcome. To protest the outcome of a procurement, a bidder must have requested and participated in a debriefing. A protest must be submitted to P4W in writing within one week after P4W has provided a debriefing. P4W may consider late protests, but is not required to do so.

All protests must be submitted in writing to the P4W Chief Compliance and Policy Officer and state the basis for the protest in clear terms and provide an alternative that the protestor finds acceptable. The basis of the protest must be a violation of rules, regulations, or policies applicable to the procurement process.

P4W will review and investigate all protests. During any part of the investigation process, P4W may require additional information or clarification from the protestor. Such requests by P4W must be responded to by the protestor within the designated timeframe set by P4W. In the event the protestor fails to respond within the timeframe, the protest may be dismissed, and no further protest will be accepted relative to the identified procurement.

Upon completing its review and investigation, P4W will issue a written response that will serve as a final decision to the protestor, which the protestor may choose to appeal. All appeals must be submitted to P4W by the protestor in writing to the P4W Chief Compliance and Policy Officer within one week after receiving a final decision from P4W.

The effective dates of contracts or agreements related to a procurement under protest may be delayed pending resolution of the protest. P4W reserves the right to revise any aspect of the procurement, re-solicit or re-issue solicitations, renegotiate potential contract terms, or take any other reasonable steps should a protest be upheld.

24. WIOA-Specific Procurement Requirements

Applicable Authority - As a pass-through entity of funding authorized by the Workforce Innovation and Opportunity Act (WIOA), P4W will adhere to all procurement-related rules and regulations of WIOA when conducting procurement using WIOA funds, as set forth in:

- Workforce Innovation and Opportunity Act (WIOA) (Pub. L. 113-128); July 22, 2014;
- DOL WIOA Final Rule at 81 FR 56072, August 19, 2016;
- WIOA Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions; Final Rule; at 81 FR 55791; August 19, 2016;
- WIOA 121(d)(2)(A) and as set forth in DOL Training and Employment Guidance Letter WIOA NO. 15-16, dated January 17, 2017;
- Rules and regulations of the PA Department of Labor and Industry that are applicable to WIOA, including but not limited to the Financial Management Guide and Workforce System Policies; and
- Administrative Provisions Under Title I of WIOA, 20 CFR Part 683.

Areas of procurement activity governed by WIOA-specific rules and regulations, which P4W will adhere to, include but are not limited to:

- WIOA Service Providers: Selection of providers to deliver WIOA Adult, Dislocated Worker, and Youth Services, or any other service or program authorized by and funded through WIOA, for which P4W is conducting procurement;

- One-Stop Operator: Selection of entities to act as One-Stop Operators;
 - One-Stop Operators must be designated and certified through a competitive process at least once every four years;

APPENDIX I - Summary of Requirement Variations and Thresholds

Below is a summary of requirements from this procurement policy that vary based on thresholds established within the policy, related to the aggregate value of the procurement effort. This summary is provided for informational purposes to assist those involved in conducting procurement. It is not intended to be comprehensive or all-inclusive. Also, it does not summarize requirements that apply in all procurement situations. P4W employees and authorized representatives must review the full policy for a complete understanding of requirements, including circumstances that provide for further variation from the requirements in this appendix. In the event of a conflict between this appendix and the text of the procurement policy, the latter will supersede.

Requirement/Area of Policy	Micro-purchase Below the MPT (Public Funds: \$0 - \$9,999.99) (\$0 - \$2,999.99 for procurement governed by PAL&I FMG)	Small Purchase Between the MPT and SAT (Public Funds: \$10,000 - \$99,999.99) (\$3,000 - \$99,999.99 for procurement governed by PAL&I FMG)	Formal Procurement Above the SAT (Public Funds: \$100,000+)
Price/Cost Estimation	Commensurate with procurement	Commensurate with procurement	Documented price or cost estimate
Solicitation	Commensurate with procurement	Commensurate with procurement	Written solicitation (e.g., RFQ or RFP)
Number of Bids, Proposals, or Quotes	Commensurate with procurement	No advertisement - minimum of two With advertisement - minimum of one with full and open competition (best practice of three)	Minimum of one with full and open competition (best practice of three)
Noncompetitive Procurement "Sole Source"	Without justification or approval	Justification and officer-level approval	Justification and officer-level approval
Advertisement/Public Notice	Optional	Optional	P4W website and one other location (minimum 30 days)
Approval - Before Solicitation	Web-purchasing process	Officer-level	Officer-level
Approval - Selection	Web-purchasing process	Officer-level	Officer-level
Evaluation and Selection Process	Commensurate with procurement	Commensurate with procurement	Written criteria, within solicitation Documented evaluation Evaluation team
Notification to Bidders	If advertised, NLT two weeks after approval of contracts and agreements	If advertised, NLT two weeks after approval of contracts and agreements	NLT two weeks after approval of contracts and agreements
Procurement Documentation	Commensurate with procurement	Minimum requirements of Procurement Policy (basic procurement memo)	Minimum requirements of Procurement Policy (detailed procurement memo)
Written Contract	Not required	Written contract required	Written contract required

THRESHOLDS BY INDIVIDUAL CONTRACT VALUE

In addition to the requirement variations summarized above, which are based on procurement thresholds and the aggregate value of procurement efforts, the following requirements are instead based on the value of individual contracts or agreements.

\$100,000 Contract Threshold		
Requirement/Area of Policy	Aggregate Contract Value Below \$100,000	Aggregate Contract Value Above \$100,000*
Approval for Contracts and Agreements – Public Funding* See policy for further approval guidance regarding amendments	Officer-level	P4W Executive Committee
Contract Price and Cost Analysis	Commensurate with procurement	Written analysis

**For procurements using only private funds, approval from the P4W Executive Committee is required for contracts or agreements that meet or exceed \$250,000 in potential value. See policy for further approval guidance regarding amendments.*

WIOA TITLE I ADULT & DISLOCATED WORKER POLICY GUIDE



EFFECTIVE DATE: FEB 28, 2025

PARTNER4WORK PITTSBURGH, PA

Table of Contents

OVERVIEW	4
PARTNER4WORK	4
WIOA BACKGROUND	4
PURPOSE OF MANUAL	4
AUDIENCE/ RESPONSIBLE PARTIES.....	5
WIOA ADULT & DW ELIGIBILITY	5
ADULT.....	5
DISLOCATED WORKER.....	5
SELECTIVE SERVICE.....	6
ELIGIBILITY REVIEW REQUIREMENTS	7
VERIFICATION AND DOCUMENTATION.....	7
Wagner-Peyser Prior to Adult/Dislocated Worker Services.....	7
Self-Certification	7
PRIORITY OF SERVICE	9
REQUIREMENTS.....	10
WIOA ADULT & DISCLOCATED WORKER SERVICES	10
SUPPORTIVE SERVICES	11
SUPPORTIVE SERVICE REQUIREMENTS.....	11
WIOA SUPPORTIVE SERVICE AVAILABILITY	12
DISALLOWED SUPPORTIVE SERVICES.....	13
SERVICE CODES FOR SUPPORTIVE SERVICES.....	13
SELF-SUFFICIENCY.....	14
TRANSITIONAL JOBS	14
REQUIREMENTS.....	15
WIOA ADULT & DW TRAINING SERVICES	16
INDIVIDUAL TRAINING ACCOUNT (ITA)	17
WORK-BASED TRAINING.....	18
Occupational Eligibility	18
Training Length.....	19
Employer Eligibility, Requirements, & Assurances.....	19
General Program Requirements.....	20
ON THE JOB TRAINING (OJT)	20
CUSTOMIZED JOB TRAINING (CJT).....	21

INCUMBENT WORKER TRAINING (IWT)	22
FOLLOW-UP SERVICES	23
PROGRAM/PROVIDER PERFORMANCE	23
DATA ENTRY & SYSTEM OF RECORD	23
CASE MANAGEMENT	24
DOCUMENTATION REQUESTS	24
PERFORMANCE INDICATORS & GOALS	24
PERSONALLY IDENTIFIABLE INFORMATION	25
KEY TERMS	25
REQUIREMENTS	26
COMPLAINT & GRIEVANCE POLICY	27
BACKGROUND	27
POLICY	27
POLICY EXCEPTIONS	29
GLOSSARY OF TERMS	29
REFERENCES	34
Eligibility	34
WIOA Adult & Dislocated Worker Services	34
Supportive Services	34
Self-Sufficiency	34
Transitional Jobs	34
Training Services	34
Follow Up Services	35
Personally-Identifiable Information	35
Complaint & Grievance Policy	35
POLICY UPDATES	35
SELF-CERTIFICATION FORM	APPENDIX A
TELEPHONE VERIFICATION FORM	APPENDIX B
STATEMENT OF FAMILY SIZE/FAMILY INCOME	APPENDIX C
COMPLAINT & GRIEVANCE FORM	APPENDIX D

OVERVIEW

PARTNER4WORK

Partner4Work (P4W), formerly Three Rivers Workforce Investment Board, was established by the Workforce Investment Act of 1998 (WIA) and was later reauthorized by the Workforce Innovation and Opportunity Act in 2014 (WIOA). In its 20+ years, Partner4Work has delivered innovative solutions and supported local partners to develop a thriving workforce in Allegheny County and the City of Pittsburgh. From its initial focus as a small think tank, P4W has evolved its focus to include the development of strategic and systemic workforce solutions and funding key workforce partners including PA CareerLink(R) Allegheny County/Pittsburgh. With a budget comprised of public and private workforce funds, Partner4Work delivers a comprehensive portfolio of programs and initiatives to meet the current and future needs of employers and job seekers.

Our Vision

Partner4Work envisions a thriving and prosperous community, where all residents have access to expansive career opportunities and all businesses have access to a talented workforce.

Mission

To develop a thriving workforce, Partner4Work drives and delivers strategic investments, provides expertise, and creates opportunities for businesses, job seekers, agencies, and policymakers in Allegheny County and the City of Pittsburgh.

To find out more about Partner4Work: www.partner4work.org/

WIOA BACKGROUND

WIOA provides the framework for a national workforce preparation system that is flexible, responsive, employer-driven, customer-focused, and locally managed. The Act integrates workforce development programs to better respond to the employment needs of workforce system customers—employers and job seekers. The WIOA system is built around several key principles:

- **Streamlining Services:** Integrating multiple employment and training programs at the customer level through the one-stop delivery system to simplify and expand services for job seekers and employers.
- **Empowering Individuals:** Customers will be empowered to name the skills they possess and obtain the services and skills they need to enhance their employability.
- **Universal Access:** Through the one-stop system, every customer will have access to a set of core employment-related services.
- **Increased Accountability:** Providers of service will be held accountable for meeting employment-related performance measures.
- **Local Oversight:** Local boards (such as Partner4Work) with involvement from the private sector are responsible for program planning and oversight of the local system.
- **Local Flexibility:** WIOA provides local flexibility to improve and encourage innovative and comprehensive workforce investment systems. Local partners play a key role in policy development that is customized to meet the needs of local markets.

- **Improved Youth Programs:** WIOA seeks to expand youth programs by encouraging a close connection to the local labor market and communities with strong linkages between academic and occupational learning.

PURPOSE OF MANUAL

This manual provides policy and procedure guidance for Partner4Work (P4W) partners and subgrantees

delivering Workforce Innovation and Opportunity Act (WIOA) Title I Adult and Dislocated Worker programming and services in Allegheny County and the City of Pittsburgh. These policies are to be used when determining eligibility and providing services funded by WIOA; their implementation is the responsibility of Title I program and Partner4Work staff.

AUDIENCE/ RESPONSIBLE PARTIES

These policies apply to all Allegheny County/ Pittsburgh WIOA Title I Adult and Dislocated Worker participants and to individuals interested in enrolling in these programs.

Allegheny County/Pittsburgh WIOA Title I Adult and Dislocated Worker staff and Partner4Work staff are responsible for implementing these policies.

WIOA ADULT & DW ELIGIBILITY

This section ensures all Workforce Innovation and Opportunity Act (WIOA) [participants](#) in Allegheny County and the City of Pittsburgh who receive WIOA Adult and/or Dislocated Worker program funded services are eligible for and registered to receive those services.

ADULT

WIOA Title I Adult participants must meet basic eligibility requirements. These include:

- Be 18 years of age or older;
- Be a citizen or noncitizen authorized to work in the U.S.; and
- Meet [selective service](#) registration requirements (individuals assigned male at birth only, if applicable)

DISLOCATED WORKER

WIOA Title I Dislocated Worker participants must meet basic eligibility requirements. These include:

- Be 18 years of age or older;
- Be a citizen or noncitizen authorized to work in the U.S.; and
- Meet [selective service](#) registration requirements (individuals assigned male at birth only, if applicable)

WIOA Title I Dislocated Worker participants must also fit in one or more of the following five categories, as described in WIOA Section 3 (15):

- 1) Terminated/Laid Off; Eligible for unemployment compensation (UC) and Unlikely to Return
 - a. Has been terminated or laid off, or who has received a notice of termination or layoff, from employment, including separation notice from active military service (under other than dishonorable conditions); AND is eligible for or has exhausted entitlement to unemployment compensation; **AND** is unlikely to return to a previous industry or occupation; OR
 - b. Has been terminated or laid off, or who has received a notice of termination or layoff, from employment, including separation notice from active military service (under other than dishonorable conditions); AND Has been employed for a duration sufficient to demonstrate, to the appropriate entity at a one-stop center, 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 unemployment compensation law; **AND** is unlikely to return to a previous industry or occupation.

- 2) Permanent Closure/Substantial Layoff/General Announcement of Employer Closure
 - a. Has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, military installation, or enterprise;
 - b. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or
 - c. For purposes of eligibility to receive services other than [training services](#) described in WIOA section 134(c)(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
- 3) Formerly Self-Employed/Currently Unemployed
 - a. Was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters
- 4) Displaced Homemaker
Defined as an individual who has been providing unpaid services to family members in the home and who
 - a. Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment; and
 - b. Has been dependent on the income of another family member but is no longer supported by that income; or
 - c. 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 member.
- 5) Military Spouse
 - a. 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), and 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
 - b. Is the spouse of a member of the Armed Forces on active duty and who also is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

Individuals who are working, but underemployed, may still meet the eligibility requirements for Adult, Adult [Priority of Service](#), and/or Dislocated Worker services if all other eligibility criteria are met. Please refer to Partner4Work's definition of "underemployed" [HERE](#).

SELECTIVE SERVICE

Individuals are required to register with Selective Service if they meet the following criteria:

- U.S. Citizen or Permanent Resident Non-Citizen;
- Between the ages of 18 and 26; and
- Assigned male at birth;

Qualifying individuals who failed to register with Selective Service by their 26th birthday and can provide written explanation and supporting documentation of any of the following may be eligible for WIOA services:

- Over the age of 26 and were willing but unknowing of the requirement to register with Selective Service;

- Incarceration, institutionalization, or hospitalization between the ages of 18-26; OR
- Non-citizen status and non-permanent resident status before age 26.

Partner4Work will monitor Selective Service exceptions to ensure that proper procedures are followed.

ELIGIBILITY REVIEW REQUIREMENTS

VERIFICATION AND DOCUMENTATION

WIOA Adult and Dislocated Worker staff must verify participant eligibility prior to the provision of services. It is the WIOA Adult and Dislocated Worker staff's responsibility to review and sign off on all registration paperwork for completeness and accuracy. Staff must maintain a centrally controlled file for each program applicant and registrant which contains copies of all eligibility documents collected. If documents are not uploaded to CWDS, the participant may be deemed ineligible for the program and all costs associated with them may be disallowed. WIOA Adult and Dislocated Worker staff will provide Federal, State, and Partner4Work monitors with access to such records given reasonable notice. The following differences between verification and documentation should be noted:

- **Verification** means to confirm eligibility requirements through examination of documents (e.g., birth certificates or public assistance records) or speaking with representatives of authorized agencies.
- **Documentation** means to maintain physical evidence, which is obtained during the verification process, in participant files. Examples of such evidence are copies of documents (where legally permitted).

Secondary Eligibility Review

To ensure accurate and compliant determinations under WIOA, all eligibility decisions must undergo a secondary staff review before enrollment. The primary reviewer is responsible for collecting and verifying all necessary documentation, while a secondary reviewer, such as a supervisor or authorized staff member, must conduct a second-level review to confirm accuracy and completeness before enrollment. This review must be clearly documented, including the name of the reviewer, their signature, the date of review, and any necessary corrections. Any secondary review documentation must be kept in the appropriate file. If discrepancies are found, the eligibility application must be returned for correction before approval, and all identified issues must be resolved prior to final enrollment. P4W will conduct regular monitoring to ensure adherence to this policy, and staff training will be provided as needed to maintain compliance.

Wagner-Peyser Prior to Adult/Dislocated Worker Services

Individuals whose WIOA Adult and/or Dislocated Worker eligibility is not yet determined may receive interim support from Wagner-Peyser, WIOA Title III services as they are universally available without eligibility requirements. Upon WIOA Adult and/or Dislocated Worker eligibility determination, participants may continue to receive Wagner-Peyser services, as well as services associated with the applicable WIOA Adult/Dislocated Worker programs.

Self-Certification

WIOA Adult/Dislocated Worker programs should consider [self-certification](#) as a viable alternative for populations whose life circumstances may preclude immediate access to certain eligibility documents. In compliance with federal and state policy requirements, self-certification may be used when document collection would delay or prevent a customer from enrolling into a program and moving ahead with services.

Self-certification should not be used as a primary source of verification if other documentation can be obtained without a significant delay or undue hardship to the participant. Other acceptable documentation or verification for the participant must be used if readily available or reasonably attainable. If self-certification is used, a case progress note must document the circumstances that necessitated the use of the self-certification including what action steps were taken to obtain other primary sources of documentation. Case progress notes must be entered into the state's sole system of record, the Commonwealth Workforce Development System (CWDS).

Sample case note: The WIOA self-certification form was submitted to verify "date of dislocation". The participant did not have any other documentation available to prove the date of dislocation. We are utilizing the self-certification form because no other options for verification are readily available or reasonably attainable.

Telephone Verification

Providers are encouraged to use telephone verification prior to [self-certification](#) for Adult and Dislocated Worker participants where practical. Telephone verification involves verification of eligibility criteria through phone calls with recognized governmental or social services agencies. Information obtained through this method should be documented on the attached **Telephone/Document Inspection Verification Form**. Information recorded must be adequate to enable a monitor or auditor to report back to the cognizant agency or the document used. In some cases, the information provided by the agency through telephone contact may be sufficient to satisfy multiple eligibility criteria. Verification of eligibility through document inspection is appropriate when documents cannot or may not be copied.

Random Sampling Methodology

To verify applicant self-certification usage, Partner4Work will adopt a random sampling methodology. The methodology will verify eligibility in self-certified applications and will be implemented for all WIOA Adult and Dislocated Worker programs.

Partner4Work estimates that less than 1% of participants report incorrect information when self-certifying eligibility criteria. For the purpose of ensuring the validity of self-certified data, Partner4Work will use a 90% confidence interval and 5% margin of error. A random sample of the population utilizing self-certification will be selected to verify if the information those individuals reported is correct. The size of the sample depends on the size of the population and is outlined in the table below.

Population will be measured by funding stream (e.g. Dislocated Worker) and not by individual provider. Participants selected through the random sampling methodology will be notified at the time of eligibility and required to provide additional eligibility documentation.

Population Size and Random Sample Size

Population Size	Random Sample Size
25	8
50	9
75	9
100	10
200	10
300	10
400	10
500	14
750	20
1000	26

If more than 10% of examined participants are found to be ineligible, Partner4Work will take corrective action, including providing technical assistance to providers utilizing [self-certification](#) as a form of eligibility

Self-Certification List:

Workforce staff must use self-certification in a manner reflective of this policy guide. Self-certification may be used for criteria elements including, but not limited to, the following:

- Date of Birth
- Individual with a Disability
- Veteran Status
- Low Income Status at Program Entry
- Homeless (Adult)
- Date of Actual Dislocation (Dislocated Worker)
- Displaced Homemaker (Dislocated Worker)
- Reemployment Opportunity is Poor/ Unlikely to Return-to-Work (Dislocated Worker)
- Permanently or Temporarily Laid Off as a Consequence of a Disaster (Disaster Grant Dislocated Worker Grant)
- Long-Term Unemployed (Disaster Dislocated Worker Grant)

For comprehensive detail and a listing on data validation and documentation requirements, including where self-certification may be used, review US Department of Labor Training and Employment Guidance Letter (TEGL) 23-19, Change 2, Guidance for Validating Required Performance Data Submitted by Grant Recipients of USDOL Workforce Program

PRIORITY OF SERVICE

Priority requirements are established within WIOA with respect to funds allocated toward WIOA Adult career and training services to ensure funds support veterans and individuals with barriers to employment. Individuals who fall within the categories listed below must be given priority for individualized career services and training services; priority does not apply to basic career services.

COVERED PERSON: “Covered Person” – as defined in section 2(a) of the Jobs for Veterans Act (JVA) of 2008 means a veteran or eligible spouse. A veteran is defined as a person who served at least one day in the active military, naval, or air service and who was discharged under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).

ELIGIBLE SPOUSE: “Eligible Spouse” - as defined in section 2(a) of the JVA means the spouse of any of the following individuals:

- 1) Any veteran who died of a service-connected disability;
- 2) Any member of the Armed Forces serving on active duty who, at the time of application for service under this section, is listed in one or more of the following categories and has been so listed for a total of more than 90 days: (I) missing in action; (II) captured in the line of duty by a hostile force or (III) forcibly detained or interned in line of duty by a foreign government or power;
- 3) Any veteran who has a total disability resulting from a service-connected disability as evaluated by the Department of Veterans Affairs;
- 4) Any veteran who died while having a disability, as indicated in bullet (3) of this definition was in existence.¹ A spouse whose eligibility is derived from a living veteran or service member (i.e.,

category 2 or 3 above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

REQUIREMENTS

For WIOA Adult program and training services, [priority](#) shall be given to [covered persons](#) and recipients of public assistance, [low income individuals](#), and individuals who are [basic skills deficient](#).

Priority must be provided in the following order:

- 1) First, to veterans and [eligible spouses](#) who are either recipients of public assistance, low-income, and/or basic skills deficient;
- 2) Second, to individuals who are not veterans or eligible spouses who are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient;
- 3) Third, to veterans and eligible spouses who are not recipients of public assistance, low-income individuals, or basic skills deficient;
- 4) Last, to non-covered persons who are not recipients of public assistance, low-income individuals, or basic skills deficient, but do meet Adult program eligibility requirements.

Individuals eligible for [priority of service](#) shall be identified at the point of entry, whether that is PA CareerLink® site, online self-service application, or other WIOA Title I Adult provider location. Upon identification they shall be notified of:

1. Their entitlement to priority of service;
2. The full array of programs and services available to them;
3. Any applicable eligibility requirements for those programs and services.

PA CareerLink® or other WIOA Title I Adult provider staff must ensure individuals who qualify for priority of service receive career and training services before other non-covered individuals and receive first priority on any waiting lists that are maintained for training slots. However, once a participant is enrolled in a workshop, training, or service, they may not be displaced by an individual qualified for priority of service.

Internal Monitoring

Understanding the Commonwealth goal of 50.1% of Adult participants from priority groups outlined in WSP- Priority of Service (April 28, 2022), Partner4Work will regularly monitor reporting on the percentage of Adult participants who fall into a priority of service category. Should the year-to-date percentage of priority populations served fall below 50.1%, Partner4Work will work with the WIOA Title I PA CareerLink® Operator and WIOA Title I Adult providers to identify areas for additional outreach to priority populations.

WIOA ADULT & DISCLOCATED WORKER SERVICES

WIOA provides for a workforce system that is accessible to all job seekers, customer centered, and training that is job-driven. The workforce system delivers career and [training services](#) at the nation's nearly 2,500 American Job Centers e.g., PA CareerLink®. Career services consist of three types: (1) Basic career services, (2) Individualized career services, and (3) Follow-up services.

- 1) **Basic career services** are universally accessible under [Wagner-Peyser](#), which provides eligibility for all job seekers authorized to work in the U.S. and must be made available to all individuals seeking employment and training services at PA CareerLink®. These include but are not limited to

eligibility determinations; initial skill assessments; labor exchange services such as job search, placement assistance, and career counseling; provision of information and assistance regarding the labor market. These services are also provided by WIOA Adult and Dislocated programs, for those determined eligible.

- 2) **Individualized career services**, specific to those enrolled in WIOA Adult and Dislocated Worker programming, are provided when PA CareerLink® staff determine that such services are required to retain or obtain employment. Individualized career services include services such as: specialized assessments, developing an individual employment plan (IEP), counseling, work experiences (including transitional jobs), etc. Once determined appropriate, these services will generally be provided by the Adult and Dislocated Worker programs.
- 3) **Follow-up services** must be provided, by state and local areas, to Adult and Dislocated Worker participants who are placed in unsubsidized employment, for up to 12 months after the first day of employment. The requirements of [Follow-Up Services](#) are included in a section below.

SUPPORTIVE SERVICES

Supportive Services are designed to provide participants with the resources necessary to enable their participation in WIOA career and/or training services. This section ensures appropriate and necessary [supportive services](#) to assist program [participants](#) are available.

SUPPORTIVE SERVICE REQUIREMENTS

The following are supportive service eligibility requirements for adult and dislocated workers:

- Participant must be a WIOA eligible Adult or Dislocated Worker.
- Participant must be participating in WIOA career services or [training services](#).
- Participant must be unable to obtain supportive services through other programs providing such services.

The WIOA Title I Adult, Dislocated Worker program staff should meet with each participant to assess the need for supportive services. Each participant should be given individualized case management services and plan development in order to eliminate possible dependency on supportive services. Supportive services awards should be based on individual participant needs and plan development. This information should be properly documented in the Individual Employment Plan and case notes in the Commonwealth Workforce Development System. Per WIOA, supportive services may only be awarded when necessary to enable participation in WIOA career services or training activities. A supportive service shall qualify as “necessary to enable participation in WIOA career services or training services” if staff determine, following a needs assessment and IEP development, that a supportive service would help a participant successfully participate in a WIOA activity and/or achieve a goal established in their IEP. P4W funds must be used in accordance with the requirements of the Federal Uniform Guidance and all other guidance and regulations applicable to the funding source.

WIOA funds are intended to be used to provide supportive services when they are not readily available through other resources and service providers. WIOA Title I Adult, Dislocated Worker, and Youth program staff are responsible for coordinating services and providing referrals to other state and local agencies offering supportive services. WIOA-funded supportive services shall be permitted, in accordance with this policy, if it is determined by WIOA program staff that a referral to other resources or service providers is not possible or cannot be made within the timeframe needed by the participant. Staff must provide documented proof of the service being unavailable in the area through other resources, such as PA 211 Southwest (<http://pa211sw.org/>). Additionally, staff must document the participant’s case notes that the service was confirmed as unavailable outside of WIOA.

WIOA SUPPORTIVE SERVICE AVAILABILITY

Partner4Work will only provide funding for the below list of supportive services to WIOA Adult and Dislocated Worker customers. WIOA Title I program staff will determine the need for supportive services and monitor the customer's progress and status to assess ongoing need.

- 1) **Transportation** – Supportive services funds may be used to cover certain transportation costs, including
 - a. Bus passes, not exceeding Pittsburgh Regional Transit monthly fare;
 - b. Gas cards, not exceeding \$75 per week. The amount allowable for assistance is determined by the mileage to and from work or training, confirmed by [Google Maps](#), at the [established federal rate](#). Mileage verification must be documented and maintained in the participant's file. Providers must use the table below for distribution:

Weekly Travel	5-30 miles	31-75 miles	76+ miles
Gas Card Amount	\$25	\$50	\$75

- c. Ridesharing (Uber, Lyft, etc.) vouchers, not exceeding \$60 per week. For a ridesharing voucher to be issued to a participant, one or more of the criteria below must be met. Service providers may refer to Pittsburgh Regional Transit public transportation schedules or other services (e.g. Google Maps) to verify and document that these criteria are met.
 - i. The overall travel time to/from the destination by public transit would be 1 hour or more in either direction;
 - ii. The public transit route to/from the destination would require more than one transfer in either direction;
 - iii. The final bus stop on the route (to/from) is more than 1/2 of a mile from the destination or does not have a clear pedestrian route to the destination (e.g. lack of sidewalks); or
 - iv. The bus schedule for the route (to/from) the destination would require a wait time of 30 minutes or more at a bus stop or shows no buses running during the required travel time.
- 2) **Childcare:** Participants may receive support for childcare expenses during hours required for participation when necessary for participation in services. To qualify, participants must first apply for support through the Pennsylvania Department of Human Services (DHS) subsidized childcare program, Child Care Works. The annual income for a family to be eligible to receive a subsidy is 200 percent or less of the Federal Poverty Income Guidelines (FPIG); work hour, education hour, and child age requirements must also be met.
 - a. Funds may be used to cover childcare costs when participating in this subsidized childcare program, including childcare costs incurred if placed on the waitlist for the program. Supportive services funding may also be used to provide support for childcare expenses for participants who meet income eligibility criteria for Child Care Works (PA's subsidized childcare program), but do not qualify based on other criteria.
 - b. Individuals disqualified from Child Care Works due to family income exceeding 200 percent may still qualify for supportive service funds if the following criteria are met.
 - i. Staff determine such resources are necessary to enable participation; and
 - ii. Participant family income falls under 300 percent of the FPIG.
- 3) **Clothing and/or uniform:** A WIOA participant may receive one (1) voucher for up to \$100 to purchase clothing and/or a uniform(s) necessary for participation in training, a job interview, or the first week of employment if these items are not provided by the training provider or employer.
- 4) **Equipment/tools:** A WIOA participant may receive one (1) voucher for up to \$250 to cover the

costs of tools and/or equipment necessary for participation in training or the first week of employment if these items are not provided by the training provider or employer.

- 5) **Driver's license or state identification card:** A WIOA participant may receive supportive services funds for one (1) instance of the cost of obtaining a state driver's license or identification card. Supportive service funds may not be used to pay for the costs of fines, penalties, or legal fees associated with obtaining or reinstating a driver's license.
- 6) **Non-employer paid licensing/certification or educational testing fees-** A WIOA participant may receive funding for a maximum of two (2) instances of the same license/certification or test utilizing WIOA supportive services dollars. WIOA Title I program staff will determine the need for licensing or testing through employer demand. The staff will make the necessary arrangements with the vendor for payment. The cost of GED testing and/or obtaining GED transcripts may be covered under this supportive services category.
- 7) **Drug Testing and/or TB Testing:** A WIOA participant may have one (1) instance of a drug test and/or TB test paid for through WIOA supportive services dollars.
- 8) **Criminal Background Checks and/or Clearances—** A WIOA participant may have one (1) instance of obtaining a criminal background check and/or clearances necessary to begin employment and/or education paid through WIOA supportive services dollars. This includes one (1) instance of each of the following: Pennsylvania Child Abuse History Clearance, Pennsylvania State Police Criminal Record Checks, and Federal Bureau of Investigations (FBI) Criminal History Background Check.
- 9) **Unions and Registered Apprenticeships Fees:** A WIOA participant applying to a union and/or registered apprenticeship may receive assistance for non-employer paid, non-refundable costs required for initial admittance or participation in the program. These costs may include application fees, initial dues (one month only), and/or required clothing/shoes. Supportive services funds may only be used if the expenses are a requirement for participation in training and/or a reasonable condition of employment.
- 10) **Reasonable accommodations for individuals with disabilities —**WIOA supportive services dollars may only be used as the funding of last resort for these accommodations.

DISALLOWED SUPPORTIVE SERVICES

The following are prohibited to be purchased with WIOA supportive service funds. This list is not exhaustive.

- Supportive services purchased prior to the participant's program enrollment.
- Fines and penalties such as traffic violations, late fees, and interest payments.
- Entertainment, including tips.
- Contributions or donations.
- Titled or deeded items or when recovery of the expense is anticipated.
 - Examples include: Rent or housing deposits, mortgage payments, homeowners insurance, property taxes, car payments, purchase of vehicles
- Alcohol or tobacco products.

SERVICE CODES FOR SUPPORTIVE SERVICES

Each supportive service provided has a corresponding service code, which you will find below to ensure accurate entry into CWDS.

WSS01	Transportation
-------	----------------

WSS02	Childcare
WSS03	Dependent Care
WSS04	Housing
WSS05	Needs Related Payments
WSS06	Needs Based Payments
WSS07	Stipend
WSS08	Assistance With Uniforms Or Other Appropriate Work Attire and Work-Related Tool Costs, Including Such Items As Eyeglasses and Protective Eye Gear
WSS09	Other 1 - Driver's License & State Identification Card
WSS10	Other 2 - Non-employer paid licensing/certification or educational testing fees or Drug Testing and/or TB Testing
WSS11	Other 3 - Criminal Background Checks and/or Clearances
WSS12	Other 4 - Unions and Registered Apprenticeships Fees
WSS13	Other 5 - Reasonable accommodations for individuals with disabilities

SELF-SUFFICIENCY

The term “self-sufficiency” refers to the level of income a person or family must be below in order to be eligible for certain WIOA services. To qualify for a WIOA-funded training service, it must be determined that a client is unlikely or unable to obtain or retain employment at the self-sufficiency wage or wages comparable to or higher than wages from previous employment through career services alone.

WIOA requires Partner4Work to set the criteria for determining whether employment leads to a self-sufficient wage; Partner4Work has set the criteria for [self-sufficiency](#) at 250% of the Federal Poverty Guidelines. An individual in Allegheny County or City of Pittsburgh will be determined to be earning below the self-sufficiency [wage](#) if the following criteria are met:

1. The individual’s gross earned income is not above 250% of the Federal Poverty Guidelines; and
2. The individual is a member of a [family](#) whose combined gross earned income is not above 250% of the Federal Poverty Guidelines for its actual family size.

The chart shows family size and the 250% Federal Poverty Guidelines levels (2024)

Household Size	Federal Poverty Guideline (FPG)	250% of FPG	Hourly Self-Sufficiency Wage
1	\$ 15,060	\$ 37,650	\$ 18.10
2	\$ 20,440	\$ 51,000	\$ 24.57
3	\$ 25,820	\$ 64,550	\$ 31.03
4	\$ 31,200	\$ 78,000	\$ 37.50
5	\$ 36,580	\$ 91,450	\$ 43.97
6	\$ 41,960	\$ 104,900	\$ 50.43
7	\$ 47,340	\$ 118,350	\$ 56.90
8	\$ 52,720	\$ 131,800	\$ 63.37

The Self Sufficiency Wage, effective 01/22/2024, is \$ 18.10/hour for a family of one (1).

TRANSITIONAL JOBS

[Transitional Jobs \(TJ\)](#) are part of a portfolio of training and employment services available to job seekers in Allegheny County and the City of Pittsburgh. TJ seek to connect individuals with [chronic unemployment](#)

[or an inconsistent work history](#) with opportunities to build workplace skills and job history through time-limited and wage-paid experiences. These jobs are in the public, private, and nonprofit sectors and are subsidized up to 100 percent. Requirements for employers participating in a TJ are outlined in this section.

REQUIREMENTS

Participant Eligibility

For an individual to qualify for TJ under the WIOA guidelines, they will:

1. Have enrolled with PA CareerLink® Pittsburgh/Allegheny County WIOA Adult or Dislocated Worker programs.
2. Have completed an initial assessment and have been determined to be an individual with a [barrier to employment](#) and a history of [chronic unemployment or an inconsistent work history](#). Assessment tools must be approved in advance by Partner4Work staff. Supporting documentation proving eligibility is required; additional information can be found in the eligibility section.

Employer Eligibility

Potentially eligible employers able to participate as a TJ placement site include: private-for-profit businesses, private non-profit organizations, and public sector employers. An employer will NOT be eligible to participate as a WIOA TJ placement site if:

1. The employer has any other individual on layoff from the same or substantially equivalent position.
2. The TJ would infringe upon the promotion of or displacement of any currently employed worker or a reduction in their hours.
3. The same or a substantially equivalent position is open due to a hiring freeze.

General WIOA TJ Requirements

1. TJ must be combined with comprehensive career services and [supportive services](#).
2. TJ placements should contribute to the occupational development and upward mobility of the participant.
3. Per WIOA regulations (20 CFR 683.200(g)), “no individual may be placed in an employment activity if a member of that person’s immediate family is directly supervised by or directly supervises that individual.” For the purpose of this policy, the term “immediate family” includes a spouse, child, son-in-law, daughter in-law, parent, mother-in-law, father-in-law, sibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, and grandchild.
4. There is no expectation that the employer providing the TJ placement will hire the participant permanently.

WIOA TJ Length

TJ must be time limited (no more than 6 months and preferably 8 to 12 weeks) and require at least fifteen (15) but not more than forty (40) hours of work per week.

WIOA TJ Funding Levels

All TJ placements must pay at least the minimum wage (\$7.25/hr. at the effective date of this policy). Partner4Work TJ funds may be used to pay up to \$10.00/hr. of wages earned by a [participant](#). Providers are encouraged to develop TJ placements that pay a self-sustaining wage, as defined by [Partner4Work’s Self-Sufficiency Policy](#), and leverage additional funding to offset this cost.

The total cost per participant for a TJ will be set contractually. Per participant cost levels will take into consideration both participant [wages](#) and [supportive services](#).

TJ Provider Requirements

With assistance from PA CareerLink® Pittsburgh/Allegheny County staff, participating employers must guarantee that:

1. Employees who have financial responsibilities related to the receipt and disbursement of funding under the Agreement shall be covered by fidelity bonding.
2. The training to be provided will be in accordance with WIOA 181(a)(1)(A) and 683.275 for wage and labor standards. Worker protection requirements are set forth in WIOA Sections 181(a) (1) (A) and (B), (b) (2), (3), (4) and (5) and 188.
3. The host site and provider agree to cooperate with monitoring efforts as required by WIOA legislation and adhere to all other applicable local, state, and federal rules and regulations.
4. Funds are not used to directly or indirectly assist, promote, or deter union organizing.
5. The employer agrees to respond to Partner4Work/PA CareerLink® Pittsburgh/Allegheny County staff requests for wage and retention information of participants.
6. If the participating employer(s) has recently relocated, resulting in the loss of employment of any employee of such business at the original location in the U.S., TJ placements may not be granted to the employer(s) until after 120 days have passed since the relocation.

WIOA ADULT & DW TRAINING SERVICES

WIOA is designed to increase participant access to training services, recognizing these are critical to employment success; training services are provided to prepare job seekers to enter the workforce and retain employment.

All WIOA training services have a general eligibility requirement, determined by staff of PA CareerLink® or a program partner: training services may be provided if, after conducting an interview, an evaluation, or assessment, and career planning, that the individual:

- Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services only;
- Is in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment;
- Has the skills and qualifications to participate successfully in training services; and
- Is unable to obtain grant assistance from other sources to pay for the cost of such training.

Program providers will also use interviews, evaluations, or assessments to determine suitability, which relates to a participant's assessed ability and perceived commitment to attend training activities, successfully complete a training program, and to get and keep employment related to training.

WIOA training services include: (1) Individual Training Accounts (ITAs) (2) On-the-Job Training (OJT), (3) Customized Job Training (CJT), and (4) Incumbent Worker Training (IWT). Partner4Work also contracts directly with training providers to facilitate training cohorts of individuals for jobs in in-demand sectors or occupations through the [Industry Recognized Training Pipeline \(IRTP\)](#).

- 1) **Individual Training Accounts (ITAs)** are the primary method used in the provision of WIOA services. These act as a voucher that can be used to pay for an approved training program of the participant's choice.
- 2) **On-the Job Training**, also known as OJT, allows employers to offer training to participants while engaged in productive work by subsidizing part of the participant's wages during the OJT period, with the expectation that the participant will continue to work for the employer once the OJT is completed.
- 3) **Customized Job Training (CJT)** is defined as training by an employer or employers or by a training provider in conjunction with an employer that is provided to five or more paid participants concurrently while engaged in productive work.
- 4) **Incumbent Worker Training (IWT)** is defined as training by an employer or training provider in close partnership with an employer that is provided to paid participants who have an established employment history with the employer for 6 months or more.

INDIVIDUAL TRAINING ACCOUNT (ITA)

Briefly introduced above, an "[individual training account](#)" is a funding mechanism through which eligible individuals can access quality training programs that appear on the [Eligible Training Provider List \(ETPL\)](#) to help obtain employment in High Priority Occupations (HPOs). ITA funding is not guaranteed to any [participant](#) and is contingent on funding availability.

Participant Eligibility

In addition to the training program eligibility requirements above, the following criteria must be met:

- Students are required to complete financial aid forms if the program qualifies. Pell, PHEAA, and related grants can be utilized concurrently with WIOA ITA funds but should be used before ITA funds when the participant qualifies.
- Students must first be considered eligible and appropriate for training. If the training program selected is greater than the approved amount, the student must indicate how the remaining costs of training will be funded.
- ITAs will not be issued to any student who does not have a high school diploma, GED, or equivalent.
 - NOTE: ITAs will be considered for participants without a diploma or GED if they are simultaneously enrolled in a program to obtain these credentials (such as with our Adult Ed partners).
- ITA applications should be submitted to Partner4Work at least one week prior to the training start date for review and approval.

ITA Funding

The maximum amount of funding a participant may receive per ITA is as follows:

- Up to \$3,750 per ITA for Commercial Driver's License (CDL) programs.
- Up to \$5,000 per ITA for training programs (excluding CDL programs).

ITA funding will be issued based on training program enrollment/start and program completion. Training providers will receive 50% of the total ITA funding amount when a participant successfully enrolls into and begins an approved training program. Training providers will receive the remaining 50% of the total ITA funding amount when a participant successfully completes the approved training program. Information on this payment structure is further described in the training provider vendor agreement.

A maximum of 30 individual training accounts may be issued per training program on the Eligible Training Provider List (ETPL) during a 12-month program year (July - June). Actual ITA funding amounts will be

determined through the ITA agreement established with the training provider.

Maximum Duration Limit of ITA

ITAs will be valid for up to two years. Under limited circumstances, a person may qualify for more than one ITA. An assessment must determine additional ITA-funded training is necessary, the training must be connected to an HPO along a career pathway, and individuals must have completed all prior ITA-funded training. Additional ITA-funded training requires prior approval from Partner4Work. All other requirements of this policy apply to the initial and additional ITAs awarded to an individual.

Expenses an ITA Will Cover

ITAs may be spent on tuition, fees, books, and school supplies (if the books and supplies are required by the school).

Trainings covered by ITAs

Before awarding an ITA, PA CareerLink® staff should engage in employer conversations to confirm there are job placements available after a participant completes training. ITAs will be awarded to quality training programs that appear on the ETPL in HPOs that require less than a bachelor's degree. However, Registered Apprenticeships on the ETPL are not required to be training in an HPO and may still qualify for an ITA.

ITAs are designed to get people back into the labor force quickly. An occupation requiring a bachelor's degree or higher education is no longer eligible to receive ITA funding.

If a customer is within range of a bachelor's degree that can be achieved in the two year timeframe of an ITA and the customer can indicate how the remaining costs of training will be funded, the PA CareerLink® staff will discuss an exception basis for the customer.

Priority in ITA funding will be given to training programs providing an industry-recognized credential. Registered Apprenticeships listed on the ETPL qualify for ITA funding; participants are encouraged to consider an Apprenticeship as a viable career pathway.

ITAs should align with key industry sectors identified by Partner4Work. Partner4Work and the WIOA Title I Adult/Dislocated Worker provider(s) at PA CareerLink® Pittsburgh/Allegheny County will work to align training funds across programs to ensure a broad portfolio of strong training options.

Local workforce development boards (LWDBs) may set more stringent performance standards for training providers than the statewide minimum. Partner4Work has a commitment to ensuring that training providers offer high-quality training that will best prepare individuals to succeed in the workforce. For this reason, while participants may choose the training provider on the ETPL that best meets their needs, ITA funding for training providers on the statewide list not approved by Partner4Work must meet Partner4Work's local ETPL standards and receive written approval from Partner4Work prior to receiving ITA funding.

WORK-BASED TRAINING

Work-based training is designed to benefit job seekers by making training available to them while they are earning a wage on the job and employers by subsidizing training costs. Contracts for OJT, CJT, and IWT also require:

1. A commitment to hire participant in full-time employment at the self-sufficiency wage following training completion, among other employer assurances;
2. A limited training duration, necessary for the occupation and determined using O*NET data;
3. General [employer eligibility guidelines](#).

OJT, CJT, and IWT dollars should be prioritized for programs leading to employment in an HPO and/or in-demand industry/sector enabling the participant to become economically self-sufficient, and which will contribute to the occupational development and upward mobility of the participant. P4W will prioritize work-based training to programs aligned with our industry partnerships, including Construction, Financial Services, Healthcare, Information Technology, Manufacturing, Public Sector and Education, Retail and Hospitality, and Transportation and Logistics. The current [HPO List](#) for Pittsburgh/Allegheny County is available at [Partner4Work.org](#).

Training Length

The maximum time frame for OJT, CJT, and IWT is 6 months. Duration is a function of training needed, not the maximum allowed under the policy. Business services staff should consult with the employer and utilize Occupational Information Network's (ONET) Specific Vocational Preparation Range (SVP) to determine the appropriate occupational training needed.

Using the Specific Vocational Preparation (SVP) component provided by [ONET](#), the following duration times are recommended in addition to the participants past skill and experience.

LEVEL	TIMEFRAME
Level 1	<1 month
Level 2	1 month
Level 3	>1 month – 3 months
Level 4	>3 months – 6 months
Level 5	>6 months
Level 6	>6 months
Level 7	>6 months
Level 8	>6 months
Level 9	>6 months

Employer Eligibility, Requirements, & Assurances

Employers may qualify to participate in OJT, CJT, or IWT contracting if it is determined that they meet the following criteria:

Eligible Employer Types

- Private-for-profit business;
- Private non-profit organization; or
- Public sector employer

Employer Restrictions

An employer will not be eligible to participate in a [CJT](#), [IWT](#), or [OJT](#) if:

- The employer has any other individual on layoff from the same or substantially equivalent position.
- The training would infringe upon the promotion of or displacement of any currently employed worker or create a reduction in their hours.
- The same or a substantially equivalent position is open due to a hiring freeze.
- The positions are for seasonal employment.
- The employer is a private for-profit employment agency, i.e. temporary employment agency, employee leasing firm, or staffing agency.
- The position is not full time, i.e. minimum of 32 hours per week.
- The employer has previously exhibited a pattern of failing to provide training participants with

continued long-term employment with [wages](#), benefits and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work.

Employer Assurances

With assistance from Partner4Work staff, participating employers must guarantee that:

- All participants shall be provided benefits and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work. This will include UC coverage where the employer is normally required to provide such coverage to its employees.
- The position provides the participant benefits per company policy (i.e. insurance, paid leave, profit sharing) other than those required by law.
- Employees who have financial responsibilities related to the receipt and disbursement of funding under the Agreement shall be covered by fidelity bonding.
- The training to be provided will be in accordance with WIOA 181(a)(1)(A) and 683.275 for wage and labor standards. Worker protection requirements are set forth in WIOA Sections 181(a) (1) (A) and (B), (b) (2), (3), (4) and (5) and 188.
 - The employer agrees to cooperate with monitoring efforts as required by WIOA legislation and adhere to all other applicable local, state, and federal rules and regulations.
- Funds are not used to directly or indirectly assist, promote, or deter union organizing.
- The employer agrees to respond to Partner4Work/PA CareerLink® Pittsburgh/Allegheny County staff requests for wage and retention information of participants.
- The employer commits to retain the trained employees for a period of six months following the completion of training. Failure to do so may result in the employer being ineligible to receive further Partner4Work training funds for a period of one year.
- If the participating employer(s) has recently relocated, resulting in the loss of employment of any employee of such business at the original location in the U.S., on-the-job training contracts may not be granted to the employer until after 120 days have passed since the relocation.

General Program Requirements

- Contracts will generally not be written for low-skill jobs that generally would require little or no training.
- At the time of completion of the work-based training program, individuals must be employed in occupations that meet the following criteria:
 - Hourly wage must be at the [self-sufficiency](#) wage;
 - The occupations must be a full-time permanent position following the training (minimum of 32 hours per week).
- Per WIOA regulations, “no individual may be placed in an employment activity if a member of that person’s immediate family is directly supervised by or directly supervises that individual.” For this purpose, the term “immediate family” includes a spouse, child, son-in-law, daughter in-law, parent, mother-in-law, father-in-law, sibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, and grandchild.

ON THE JOB TRAINING (OJT)

[On-the-Job Training](#) (OJT) serves the basic purpose of encouraging employers to hire or up-grade an eligible individual, providing the skills and competencies for a position the participant would not qualify for otherwise. While the job-seeker benefits by earning a wage while learning in a hands-on environment,

employer benefits through increased staff capacity and productivity. OJT provides the employer with partial wage-rate reimbursement in exchange for self-designed, occupational training and related supervision.

Programs training five or more individuals within a single quarter or three-month period must meet the requirements for [customized job training](#) (CJT) rather than OJT.

OJT Funding Levels

Employers will be reimbursed 50 percent of a participant's wage per hour. While participants may be paid a higher hourly wage, employers will only receive 50 percent reimbursement for up to \$20/hour of a participant's wage. The maximum amount an employer may receive is \$10,000 per trained individual. Partner4Work will consider an increase in the reimbursement rate (up to 75 percent) and funding cap taking into consideration one or more of the following factors:

- Size of the employer(s) with an emphasis on small businesses;
- The characteristics of the participants taking into consideration whether they are individuals with barriers to employment;
- The quality of employer-provided training and advancement opportunities. For example, if the OJT contract is for an in-demand occupation and will lead to an industry-recognized credential;
- Wage and benefit levels of employees (at present and anticipated upon completion of training);
- Other relevant factors, as appropriate.

The [policy exceptions form](#) may be used to request an increase based on the criteria above.

CUSTOMIZED JOB TRAINING (CJT)

Similar in its design to meet the specific requirements of the employer, CJTs differ from an on-the-job training (OJT) contract based on:

1. **Volume:** An employer or group of employers requiring more than five of the same/similar positions filled
2. **Complexity:** CJT trains each participant for the same skill set rather than individualized job skills

CJT Funding Levels

Participating employers must pay a significant cost of the CJT training. This payment can be in cash or in-kind services. CJT funding cannot be used for the wages of [incumbent workers](#) while they participate in training but may be used to fund the cost of administering the training, including the wages of the trainer. The wages of unemployed individuals hired as a result of CJT funding availability are eligible to be reimbursed through CJT funding.

Companies will be reimbursed at 50 percent of the cost of training. The maximum amount a company may receive is \$5,000 per trained individual. Partner4Work will consider an increase in the reimbursement rate (up to 75%) and funding cap taking into consideration one or more of the following factors:

- Size of the employer(s) with an emphasis on small businesses;
- The characteristics of the participants taking into consideration whether they are individuals with barriers to employment;
- The quality of employer-provided training and advancement opportunities, for example if the CJT contract is for an in-demand occupation and will lead to an industry-recognized credential;
- Wage and benefit levels of employees (at present and anticipated upon completion of training);
- Other relevant factors, as appropriate.

The [policy exceptions form](#) may be used to request an increase based on the criteria above.

INCUMBENT WORKER TRAINING (IWT)

IWT is designed to meet the needs of an employer or group of employers to retain a skilled workforce or avert layoffs. IWT is not permitted to be used to provide the occupational training needed by a new hire. Incumbent Worker Training can be used to either:

- Help avert potential layoffs of employees; or
- Obtain the skills necessary to retain employment, such as increasing the skill levels of employees so they can be promoted within the company and create backfill opportunities for new or less-skilled employees.

Participant Eligibility

IWT provides further eligibility requirements for workers. For an individual to qualify for [Incumbent Worker Training](#) (IWT), they must:

1. Be currently employed and in need of additional training to avert a layoff or be retained with the employer;
2. Have an established employment history with the employer for six (6) months or more;
3. Earn less than \$20.00/hr.; and
4. Have enrolled with PA CareerLink® Pittsburgh/Allegheny County WIOA Adult or Dislocated Worker programs.

NOTE: In the event that the incumbent worker training is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for 6 months or more as long as a majority of those employees being trained do meet the employment history requirement.

IWT Requirements

1. When funds are available, WIOA IWT contracts may be written for eligible individuals when:
 - a. The employee is not earning at more than \$20/hr. Priority in funding will be given to those individuals not earning a [self-sufficient wage](#) as determined by Partner4Work.
 - b. The IWT is necessary to meet the requirements of an employer or group of employers to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment.

WIOA Incumbent Worker Training Funding Levels

Employers participating in IWT are required to pay the non-federal share (hereafter referred to “employer share”) of the cost of providing training to their [incumbent workers](#), per the sliding scale outlined below. A maximum of \$5,000 per trained worker is permitted under this policy. Partner4Work will consider exceptions to the cap on training funds. Providers must follow the process for policy exceptions found [HERE](#).

The employer share may be provided in cash or in kind and may include the wages paid by the employer to a worker while the worker is attending the [incumbent worker training](#) program. Partner4Work WIOA incumbent worker funds may not be used to pay for the wages of workers being trained. Funds provided under this program may be used for the cost of providing the training, including the cost of developing the training or fees for the training program or training provider.

The level of Partner4Work reimbursement to the employer is determined by the employer size:

1. 50 or fewer employees = 90% of the cost of training for the employer, up to \$5,000 per Incumbent

Worker participant

2. 51-100 employees = 75% of the cost of training for the employer, up to \$5,000 per Incumbent Worker participant
3. 101 and more employees= 50% of the cost of training for the employer, up to \$5,000 per Incumbent Worker participant

Employer size is determined by the number of employees at the time of the execution of the Incumbent Worker Training contract.

FOLLOW-UP SERVICES

Adult and Dislocated Worker staff must make follow-up services, including counseling regarding the workplace, available to participants, who are placed in unsubsidized employment, for a minimum of 12 months following the first day of employment or the WIOA program exit date for participants who have not placed in unsubsidized employment.

Partner4Work requires that follow-up services for Adult and Dislocated Worker participants include at a minimum quarterly contact until a full 12-month period has passed since the date of placement in unsubsidized employment or the WIOA program exit date for participants who have not placed in unsubsidized employment. Provider staff should determine if more frequent follow-up services are needed based on the participant's individual needs and career goals, as documented in their [individual employment plan](#) (IEP). Staff must document each follow-up service in the Commonwealth Workforce Development System (CWDS) through both service code entry and case notes.

Exceptions

Exceptions to the follow-up services requirement are permitted if at least one of the following criteria is met:

- Staff have made reasonable attempts to contact a participant at a minimum monthly over a three-month period and the participant has not responded. Each attempt to contact must be documented in CWDS case notes. Attempts must have been made to all phone numbers associated with a participant and through at least one other medium (e.g. email, text messaging, written letter).
- A participant has notified WIOA Adult and Dislocated Worker staff that they no longer need or want follow-up services or contact. This must be documented in CWDS case notes and any written notification from the participant must be kept in their case file.

WIOA funding may not be used to pay for [supportive services](#) for a WIOA Adult or Dislocated Worker participant during the follow-up period.

PROGRAM/PROVIDER PERFORMANCE

DATA ENTRY & SYSTEM OF RECORD

Once a participant has been verified eligible, they must be entered into the official system of record for WIOA programs in Pennsylvania. The system of record for participant-level workforce development data in PA is the Commonwealth Workforce Development System (CWDS). Providers must recognize that CWDS is the [system of record](#) for WIOA services in the Commonwealth and agree that all WIOA program data will be entered therein. Staff must be fully competent in utilizing CWDS and providing basic guidance regarding CWDS to other service providers within the P4W network, including querying and producing reports from CWDS regarding the PA CareerLink® system. P4W will utilize data from CWDS, as well as data

collected from other sources, to determine program compliance and evaluate performance of providers.

Providers will adhere to the PA CareerLink® Systems Manual for guidance on proper documentation for WIOA Title I-B Services and other PA CareerLink® participation. In addition, providers will maintain internal protocols for uniformed and detailed case notes to ensure clear and consistent tracking and documentation of progress throughout the program. Providers will participate in quality and compliance activities, as well as regular meetings and review of performance reports, and other written reports when requested.

Providers will identify staff members whose work requires access to CWDS and submit applications for CWDS access per local protocols, subject to approval by P4W. Appropriate staff members to receive CWDS access include case managers, employment specialists, job developers, and other staff members who have regular contact with participants or whose work requires monitoring and oversight of participant data maintained in CWDS. CWDS account credentials and login information may not be shared between staff members or other individuals. Providers must submit notification if any staff member with CWDS access is terminated, voluntarily or involuntarily, within 24 hours of termination. Failure to do so may result in revocation of CWDS access for program providers and contract termination.

CASE MANAGEMENT

Case management is a process of building relationships with participants, understanding clients to the extent that managers can help guide participants and recommend services and training pathways that meet their needs. WIOA programs require that case management within a provider organization also includes extensive data collection and management within guidelines set within WIOA and defined by Partner4Work staff. All entries into CWDS should be completed as soon as possible; any data entry backdated more than 30 days is considered late.

DOCUMENTATION REQUESTS

A provider's inability to deliver documentation requested by Partner4Work could result in compliance findings if the documentation is not submitted in a timely manner.

PERFORMANCE INDICATORS & GOALS

Title I Program providers must meet or exceed the goals described below, consisting of two parts - WIOA Primary Indicators of Performance and Additional Performance Indicators and Goals. The effectiveness of WIOA programs is measured across the WIOA Primary Indicators of Performance codified by federal law. Provider performance across these indicators will be evaluated according to definitions, calculations and guidance from the U.S. Department of Labor, including but not limited to TEGL 10-16 and TAC (Technical Assistance Circular) 17-01, as well as related WIOA guidance and directives from the Pennsylvania Department of Labor & Industry. As a Workforce Development Board, Partner4Work is required to negotiate goals for each of these indicators periodically with the PA Department of Labor & Industry. The indicators and negotiated goals apply to the WIOA programs that Partner4Work administers across the workforce development system in Allegheny County and the City of Pittsburgh.

Beyond measures required by WIOA, Partner4Work has incorporated additional measures to provide evidence of progress towards organizational goals around integration of services. Partner4Work reserves the right to add or modify performance measures in each year's contract negotiation.

WIOA PRIMARY INDICATORS OF PERFORMANCE GOALS FOR PERIOD OF 7/1/2023 - 6/30/2024	ADULT	DISLOCATED WORKER
A. Employment 2nd Quarter after Exit: Percentage of participants who are in unsubsidized employment during the second quarter after exit from the program	77%	80%

B. Employment 4th Quarter after Exit: Percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program	75%	78%
C. Median Earnings - 2nd Quarter After Exit: The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.	\$6,000	\$9,000
D. Credential Attainment: The percentage of participants in an education or training program who attain a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent.	75%	75%
E. Measurable Skill Gains: The percentage of participants in an education or training program who achieve measurable skill gains - documented academic, technical, occupational, or other forms of progress.	75%	75%

In addition to the WIOA Primary Indicators of Performance, Program providers must meet or exceed the following annual performance goals.

ADDITIONAL PERFORMANCE INDICATORS AND GOALS GOALS FOR PERIOD OF 7/1/2023 - 6/30/2024	ADULT & DISLOCATED WORKER
1. WIOA Enrollment. Number of new cases registered for WIOA Title I-B Services during the contract period. Individuals may have multiple cases depending on their history of involvement in WIOA Services.	1600
2. Job Placements. Specific to A/DW. Number of job placements for cases exited from A/DW Services during the contract period. Determined by all instances of employment. Multiple placements for one individual or case may be included.	PROPOSED
3. Job Placement Rate. Specific to A/DW. Number of “Job Placements” divided by program exits from A/DW Services during the contract period.	80%
4. Self-Sufficiency Wage. Specific to A/DW. Percentage of “Job Placements” that meet or exceed PARTNER4WORK’s self-sufficiency wage (subject to change). ¹⁰	80%

PERSONALLY IDENTIFIABLE INFORMATION

As part of grant activities, staff may have access to program participant or staff PII. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files, or other sources. Federal law and federal policies require that PII and other sensitive information be secured and protected at all times.

KEY TERMS

PERSONALLY IDENTIFIABLE INFORMATION: OMB defines “Personally Identifiable Information” (PII) as information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

The Department of Labor has defined two types of PII, “protected PII” and “non-sensitive PII.” The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the “risk of harm” that could result from the release of the PII.

- 1) **“Protected PII”** is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information, and computer passwords.
- 2) **“Non-sensitive PII”** is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. It is standalone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender, or race. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII.

To illustrate the connection between non-sensitive PII and protected PII, the disclosure of a name, business e-mail address, or business address most likely will not result in a high degree of harm to an individual. However, a name linked to a social security number, a date of birth, and mother’s maiden name could result in identity theft. This demonstrates why protecting the information of our program participants is so important.

REQUIREMENTS

All parties must ensure the privacy of all PII obtained from [participants](#) and to protect such information from unauthorized disclosure. All parties must ensure that PII used during their grant has been obtained in conformity with applicable Federal and state laws and policies governing the confidentiality of information.

All PII transmitted via e-mail or stored on external drives, internal hard drives, or cloud drives must be encrypted. All PII stored onsite and electronically must have limited access, be always kept safe from unauthorized individuals, and must be managed with appropriate information technology (IT) services. Accessing, processing, and storing of PII data on personally owned equipment at off-site locations (e.g. employee’s home, and non-grantee managed IT services, e.g. Yahoo mail, Gmail, etc.) is strictly prohibited.

All parties who will have access to [sensitive](#)/confidential/proprietary/private data must be advised of the confidential nature of the information, the safeguards with which they must comply to protect the information, and that they may be liable to civil and criminal sanctions for improper disclosure.

Access to any PII obtained through the grant must be restricted to only those employees of the grant recipient who need it in their official capacity to perform duties in connection with the scope of work in the grant agreement.

All PII data must be processed in a manner that will protect the confidentiality of the records/documents and is designed to prevent unauthorized persons from retrieving such records by computer, remote terminal, or any other means. When communicating with Partner4Work staff, subrecipients should never send sensitive information over their normal email platform. All emails sent to Partner4Work staff containing PII must be through DeliverySlip, Partner4Work’s secure email platform. The subrecipient should inform Partner4Work of all staff requiring DeliverySlip access.

Grantees must permit the Employment and Training Administration (ETA) and Partner4Work to make onsite inspections during regular business hours for the purpose of conducting audits and/or conducting other investigations to assure that the grantee is complying with the confidentiality requirements described above. In accordance with this responsibility, grantees must make records applicable to this agreement available to authorized persons for the purpose of inspection, review and/or audit.

Grantees must retain data received from ETA or Partner4Work only for the period of time required to use it for assessment and other purposes, or to satisfy applicable Federal and Partner4Work records retention requirements, if any. Thereafter, the grantee agrees that all data will be destroyed, including deletion of electronic data.

Additional Requirements:

1. Before collecting PII or [sensitive information](#) from [participants](#), have participants sign releases acknowledging the use of PII for grant purposes only.
2. Whenever possible, use unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to each individual record. Once the SSN is entered for performance tracking, the unique identifier would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.
3. Use appropriate methods for destroying sensitive PII in paper files (i.e. shredding) and securely deleting sensitive electronic PII.
4. Do not leave records containing PII open and unattended.
5. Store documents containing PII in locked cabinets when not in use.
6. Immediately report any breach or suspected breach of PII.

COMPLAINT & GRIEVANCE POLICY

The purpose of this section is to inform Partner4Work- funded program participants, staff, and partners of the procedures for filing a complaint or grievance alleging violations of programs and/or related policies and regulations.

BACKGROUND

Federal law mandates the development of procedures for filing complaints and grievances submitted by participants affected by, and who allege, violations of the requirements of program regulations or policies. The Partner4Work Complaint and Grievance Policy applies to program complaints and complaints regarding training and career services/activities only. For example, participants may file specific complaints pertaining to particular service provider staff and/or program services, refusal of entry into program activities, and denial of support service funds.

Partner4Work is the appropriate organization of contact when the complaint specifically concerns Partner4Work-funded programs. Each funded service provider must adhere to this policy. Service providers must retain documentation on any customer complaints that are received and resolved at the service providers' level, including the contents of the complaint and the resolution. This documentation must be made available to Partner4Work compliance monitors upon request.

POLICY

Program participants, staff, and/or other parties are encouraged to first seek an informal resolution at the service provider level regarding a complaint or grievance prior to filing a complaint with Partner4Work. Participants, staff, and/or other parties interested in filing a complaint with Partner4Work must follow the procedures below.

Step 1: Opportunity to File a Complaint

Individuals or entities seeking to file a written complaint to Partner4Work must complete the **Partner4Work Complaint and Grievance Form**, which is attached to this policy and available at

partner4work.org. This form must be mailed or emailed to the following:

Partner4Work Compliance Manager

650 Smithfield St

Centre City Tower, Suite 2400

Pittsburgh, PA 15222

grievances@partner4work.org

All complaints or grievances must be filed within **180 calendar days** of the alleged violation to be reviewed and considered by Partner4Work.

Step 2: Opportunity for an Informal Resolution

The Partner4Work Compliance Manager will notify the complainant, acknowledging receipt of the complaint, within 5 calendar days of receiving the complaint.

The Partner4Work Compliance Manager will schedule a meeting with the complainant to occur within **15 calendar days** of receiving the complaint to attempt to reach an informal resolution between the parties. If an informal resolution can be reached, Partner4Work will request a written confirmation from the complainant verifying that they agree to the terms of the resolution. Partner4Work will notify all parties involved in writing that an informal resolution has been reached.

Step 3: Opportunity for a Hearing

If Partner4Work is unable to reach an informal resolution with the complainant, the complainant will be provided the opportunity for a hearing to take place no later than **45 calendar days** after the initial filing date of the complaint.

To ensure bias does not influence the outcome of a hearing, Partner4Work will perform an assessment of qualified staff. Upon conclusion, Partner4Work will appoint an impartial and qualified individual as the Hearing Officer to act as a mediator and attempt to resolve the issue(s) and render an independent decision. The Hearing Officer will send out a written notification of the hearing to all parties concerned, stating the date, time and place of the hearing and the issues to be heard.

All parties have the right to be accompanied by an attorney (at their own expense), or other duly authorized representative. All parties have the right to present testimony and to bring witnesses and records.

A written decision will be issued by the Hearing Officer to the complainant and all parties who attended the hearing within **60 calendar days** of the filing of the complaint. The decision will include: 1) a synopsis of the facts, 2) a statement of reasons for the decision, and 3) notification of records. All correspondence will be mailed certified with a return receipt requested.

Step 4: Commonwealth Grievance and Hearing Procedures

If Partner4Work does not provide a written decision within **60 calendar days** of receiving the complaint or either party involved receives a decision determined to be unsatisfactory, either party involved has the right to submit a local level appeal to the Commonwealth of Pennsylvania regarding the complaint in compliance with the Commonwealth of Pennsylvania's established procedures.

Information Requirements

Program providers must make commercially reasonable efforts to ensure participants, staff, partners, and other parties affected by the local workforce development system are informed of the content and

requirements of this policy. This includes providing information on this policy during program enrollment and displaying the information in this policy in a public space.

Labor Standards Violations

If a collective bargaining agreement covering the parties to the grievance so provides, an individual alleging a labor standards violation may resolve the grievance through binding arbitration.

Important Disclaimers:

- This policy does not address the procedures for processing complaints alleging discrimination under WIOA Section 188 Nondiscrimination and Equal Opportunity Regulations, (29 CFR Part 38).
- This policy does not address the procedures for processing complaints for WIOA mandated partner programs outside of WIOA Title I Adult, Dislocated Worker, and Youth programs and the WIOA one-stop operator. Such complaints should be made via the internal processes of those partner organizations/agencies.
- Nothing in this policy precludes a complainant from pursuing a remedy authorized under another federal, state, or local law.

POLICY EXCEPTIONS

Under limited circumstances, Partner4Work may grant exceptions to requirements within this policy. Requests for exceptions may be submitted using the [Policy Exception Request Form](#) available at www.partner4work.org.

Exception requests will be reviewed based on their allowability under any applicable legislation, regulation, and policy. Partner4Work will also consider funding availability, how an exception will lead to improved outcomes for the customer(s) being served, and other relevant factors.

GLOSSARY OF TERMS

Hyperlinked words throughout this manual will bring the reader to the definition below, when engaged. To navigate back to the original section, simply engage **Alt+ Left Arrow**.

BARRIER TO EMPLOYMENT: The term individual with a “barrier to employment” means a member of one or more of the following populations:

- a) Displaced homemakers
- b) Low-income individuals
- c) Indians, Alaska Natives, and Native Hawaiians
- d) Individuals with disabilities, including youth who are individuals with disabilities
- e) Older individuals, i.e. those aged 55 or older
- f) Ex-offenders
- g) Homeless individuals
- h) Youth who are in or have aged out of the foster care system
- i) Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers
- j) Eligible migrant and seasonal farmworkers
- k) Single parents (including single pregnant women)
- l) Long-term unemployed individuals
- m) Recipients of public assistance

BASIC SKILLS DEFICIENT: “Basic Skills Deficient” individuals are:

- A youth with English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- A youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

CHRONIC UNEMPLOYMENT: Individuals with "chronic unemployment" or an "inconsistent work history" are those who:

- 1) Have been unemployed for 13 weeks or longer;
- 2) Were unemployed at least 26 of the past 52 weeks; or
- 3) Have held three or more jobs in the past 52 weeks and are currently unemployed or underemployed.

COVERED PERSON: "Covered Person" – as defined in section 2(a) of the Jobs for Veterans Act (JVA) of 2008 means a veteran or eligible spouse. A veteran is defined as a person who served at least one day in the active military, naval, or air service and who was discharged under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).

CUSTOMIZED JOB TRAINING: The term "Customized Job Training" means training by an employer or employers or by a training provider in conjunction with an employer that is provided to five or more paid participants concurrently while engaged in productive work in a job that:

- a) Provides knowledge or skills essential to the full and adequate performance of the occupation.
- b) Provides reimbursement to the employer(s) for the costs of providing the training and additional supervision related to the training.
- c) Is limited in duration as appropriate to the occupation for which the participants are being trained.

ELIGIBLE SPOUSE: "Eligible Spouse" - as defined in section 2(a) of the JVA means the spouse of any of the following individuals:

- 1) Any veteran who died of a service-connected disability;
- 2) Any member of the Armed Forces serving on active duty who, at the time of application for service under this section, is listed in one or more of the following categories and has been so listed for a total of more than 90 days: (I) missing in action; (II) captured in the line of duty by a hostile force or (III) forcibly detained or interned in line of duty by a foreign government or power;
- 3) Any veteran who has a total disability resulting from a service-connected disability as evaluated by the Department of Veterans Affairs;
- 4) Any veteran who died while having a disability, as indicated in bullet (3) of this definition was in existence.¹ A spouse whose eligibility is derived from a living veteran or service member (i.e., category 2 or 3 above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

ELIGIBLE TRAINING PROVIDER: "Eligible Training Provider" is a provider of training services who has met the eligibility requirements to receive WIOA title I-B Adult, Dislocated Worker, and Youth funds to provide training services to eligible individuals.

ELIGIBLE TRAINING PROVIDER LIST: The term "Eligible Training Provider List" means the commonwealth's statewide list of approved providers of training services who are eligible to receive WIOA title I-B funds.

FAMILY: "Family" means 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.

HOMELESS INDIVIDUAL: “Homeless Individual” means an individual who meets any of the following criteria:

- Lacks a fixed regular, and adequate nighttime residence; this includes a participant who:
 - Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
 - Is living in a motel, hotel, trailer park, or campground due to a lack of alternative adequate accommodations;
 - Is living in an emergency or transitional shelter;
 - Is abandoned in a hospital; or
- Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, such as a car, park, abandoned building, bus or train station, airport, or camping ground;

(Note- A participant imprisoned or detained under an Act of Congress or State law does not meet the definition. Additionally, a participant who may be sleeping in a temporary accommodation while away from home should not, as a result of that alone, be recorded as homeless.)

HOST SITES: “Host sites” are defined as a for-profit or non-profit organization, government organization, or educational institution which provides a TJ placement. Host sites must provide day-to-day supervision of the TJ participant while on site.

INCENTIVES: Incentive payments are awarded to participants in recognition of a measurable achievement directly tied to training activities or work experiences. Incentive payments differ from stipends, as they must be awarded in response to a specific outcome achieved (e.g. credential attainment, job placement, placement in post-secondary education) rather than program participation/attendance.

INCUMBENT WORKER: An “Incumbent Worker” is defined as an individual who has an established employment history with the employer for 6 months or more.

INCUMBENT WORKER TRAINING: The term “Incumbent Worker Training” means training by an employer or training provider in close partnership with an employer that is provided to a paid participant while engaged in productive work in a job that:

- a. Provides knowledge or skills essential to the full and adequate performance of the occupation.
- b. Provides reimbursement to the employer for the costs of providing the training and additional supervision related to the training.
- c. Is limited in duration as appropriate to the occupation for which the participant is being trained.

Incumbent Worker Training is intended to meet the requirements of an employer or group of employers to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment.

INDIVIDUAL EMPLOYMENT PLAN: “Individual employment plan” (IEP) refers to an ongoing strategy jointly developed by the participant and the case manager that identifies the participant’s employment goals, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goals.

INDIVIDUAL TRAINING ACCOUNT: An “individual training account” (ITA) is a funding mechanism through which eligible individuals can access quality training to help obtain employment in high demand occupations.

LOW INCOME INDIVIDUAL: The term “low-income individual” means an individual who meets one or more of the characteristics listed below:

- Recipient of Cash Public Assistance
- Family Income that does not exceed the higher of 70% of the Lower Living Standard Income Level (LLSIL) or the poverty line
- Receives Food Stamps or was determined eligible to receive in the last six months
- Homeless
- Publicly supported Foster Child
- Individual with a disability and own income at or below 70% of the LLSIL or the poverty line
- Receives, or is eligible to receive a free or reduced-price school lunch*
- An individual who resides in a high poverty area, defined as an area that has a poverty rate of at least 30% (set every 5 years, using ACS 5-year estimates)

* Programs must base low-income status on an individual student’s eligibility to receive free or reduced-price lunch, whole school receipt of free or reduced-price lunch cannot be used to determine WIOA low-income status for In-School Youth (ISY). In schools where the whole school automatically receives free or reduced-price lunch, programs can check with their local school districts for determining whether individual students are eligible.

NEEDS RELATED PAYMENTS: “Needs related payments” provide financial assistance to enable individuals to participate in training activities.

ON-THE-JOB TRAINING: “On-the-Job Training” (OJT) means training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- Provides knowledge or skills essential to the full and adequate performance of the occupation;
- Provides reimbursement to the employer for the costs of providing the training and additional supervision related to the training; and
- Is limited in duration as appropriate to the occupation for which the participant is being trained.

PARTICIPANT: For local adult, dislocated worker programs and Wagner-Peyser, a “participant” is a reportable individual who has received services other than self-service only or information-only services or activities after satisfying all applicable programmatic requirements for the provision of services.

PRIORITY OF SERVICE: The term “Priority of Service” means, with respect to any qualified job training program, that a covered person shall be given priority over non-covered person for the receipt of employment, training and placement services provided under that program, notwithstanding any other provisions of the law.

PROGRAM OF TRAINING SERVICES: “Program of Training Services” is defined as one (1) or more courses or classes, or a structured regimen that leads to a recognized post-secondary credential, secondary school diploma or its equivalent; employment; or measurable skill gains toward such a credential or employment.

SELF-ATTESTATION: “Self-attestation” occurs when an individual states his or her status for a particular data element, such as “runaway youth”, and then signs and dates a form acknowledging this status. Self-attestation is the process of: a) the individual identifying their status for permitted elements; and b) the individual signing and dating a form attesting to this self-identification.

SELF-CERTIFICATION: “Self-certification” is the individual’s signed attestation that the information said individual submitted to demonstrate eligibility for a program under title I of WIOA is true and accurate. A signed **Self-Certification Form** is a type of self-certification.

SELF-SUFFICIENCY: The term “self-sufficiency” refers to the level of income a person or family must be below to be eligible for certain WIOA services. To qualify for a WIOA-funded training service, it must be determined that a client is unlikely or unable to obtain or retain employment at the self-sufficiency wage or wages comparable to or higher than wages from previous employment through career services alone.

SENSITIVE INFORMATION: Any unclassified information whose loss, misuse, or unauthorized access to or modification of could adversely affect the interest or the conduct of Federal programs or the privacy to which individuals are entitled under the Privacy Act.

STIPENDS: Stipends are predetermined, fixed payments that may be awarded to individuals for participation or attendance in training or work experience activities. Stipends differ from incentive payments as they are not tied to specific program outcomes (e.g. credential attainment) and instead are based on levels of program participation or attendance met. Stipends are not considered income for WIOA eligibility purposes, are not required to meet minimum wage requirements, are not dispersed as payroll, and income tax is not withheld.

Stipends are not a substitute for wages. Providers should refer to applicable legislation/policies, including the Fair Labor Standards Act (FLSA), to determine when a wage must be paid to individuals.

Resources: The USDOL - Wage and Hour Division: [Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act](#) can assist in determining whether an intern vs. employee relationship exists and if a wage must be paid. The USDOL has also provided this [FLSA compliance resource](#) to assist in determining whether a student/trainee vs. employee relationship exists.

SUPPORTIVE SERVICES: The term “Supportive Services” means services such as transportation, clothing and/or uniforms, equipment/tools, drug testing and/or TB testing, and reasonable accommodations for individuals with disabilities, that are necessary to enable an individual to participate in activities authorized under WIOA.

TRANSITIONAL JOB: The term “Transitional Job” (TJ) means paid work experience that:

- a. Is time limited and subsidized;
- b. Is in the public, private, or nonprofit sector;
- c. Is provided to individuals with barriers to employment who are [chronically unemployed](#) or have an inconsistent work history;
- d. Is combined with comprehensive employment and [supportive services](#); and
- e. Is designed to help participants establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment.

UNDEREMPLOYED: P4W defines the term “underemployed” as meeting one or more of the following criteria:

- An individual who is employed less than full-time who is seeking full-time employment, including individuals who may be employed at full-time across multiple positions, but are seeking full-time employment at a single position;
- An individual who is employed in a position that is inadequate with respect to their skills and training;
- An individual who is employed, but earning a wage that is below the [self-sufficiency](#) wage as

defined by Partner4Work's Self-Sufficiency Policy; or

- An individual who is employed, but whose earnings are not sufficient compared to their previous position's earnings from their previous employment.

WAGES: A wage is generally a payment for services rendered where an employer/employee relationship exists. This form of compensation is usually paid through a payroll system and is subject to the taxes applicable to the employer of record and participants. Paying a wage usually indicates that a program views the youth as an employee.

REFERENCES

Eligibility

- Jobs for Veterans Act (JVA) of 2008
- Training and Employment Guidance Letter (TEGL) 19-16
- [US Selective Service System FAQs](#)
- WIOA Section 134(b)(3)(E)
- WIOA Section 3(2), (5), (15), (16), (36)
- WORKFORCE SYSTEM GUIDANCE No. 04-2015 (Change 1), September 11, 2017
- Workforce System Policy (WSP) – Priority of Service (April 28, 2022)

WIOA Adult & Dislocated Worker Services

- TEGL 19-16

Supportive Services

- Dislocated Worker Near Completer Demonstration Project – Notice of Grant Availability (March 19, 2021)
- WIOA Section 3(59)
- 20 CFR §680.900

Self-Sufficiency

- Department of Health and Human Services - Federal Poverty Guidelines - 87 Federal Register 3315
- TEGL 12-15
- WIOA Section 134(d)(1)(A)(x)

Transitional Jobs

- Partner4Work Eligibility Policy
- Partner4Work Supportive Services Policy
- WIOA Section 134(c) (3)(H)
- WIOA Section 134(d) (1-5)
- 20 CFR 680.150
- 20 CFR 680.530
- 20 CFR 680.830

- 20 CFR 680.840
- 20 CFR 680.850
- 20 CFR 680.900

Training Services

- Partner4Work Eligible Training Provider List Policy and Procedures
- Partner4Work Eligibility Policy

- Partner4Work Self-Sufficiency Policy
- [TEGL 19-16](#)
- WIOA Section (3)(44)
- WIOA Section 134(c) (3)(H)
- 20 CFR 680.530
- 20 CFR 680.700
- 20 CFR 680.710
- 20 CFR 680.730
- 20 CFR 680.740
- 20 CFR 680.760
- 20 CFR 680.780-820

Follow Up Services

- TEGL 19-16 (March 1, 2017)
- TEGL 21-16 (March 2, 2017)
- WIOA 20 CFR § 678.430
- WIOA 20 CFR § 681.580
- WIOA Sec 129(c)(2)(I)
- WIOA Sec 134(c)(2)(A)(xiii)

Personally-Identifiable Information

- TEGL 39-11

Complaint & Grievance Policy

- WIOA Final Rule 20 CFR § 683.600
- WIOA Section 181(c)

POLICY UPDATES

Supportive Services

Date	Update
12/15/2023	<ul style="list-style-type: none"> • Revised language to clarify when a supportive service can be determined to be “necessary to enable participation in WIOA career services or training”. • Revised language to clarify how providers may determine that a supportive service is unavailable through resources outside of WIOA funding.

	<ul style="list-style-type: none"> • Removed references to the Near Completers Demonstration Grant. • Updated Policy Exceptions section to direct reviewers to the P4W Policy Exception Form.
--	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

7/1/2024	<ul style="list-style-type: none"> • Revised policy to restructure supportive service gas card distribution determined by mileage traveled to and from work or training at the established federal rate. • Raised the weekly allowance of gas cards to \$75 from the \$60 cap for qualifying participants. • Added childcare category to list of supportive services to align with DOL Green Infrastructure. • Added section to establish disallowed supportive service categories. • Added section to establish service codes for undefined supportive service categories.
-----------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Self-Sufficiency

Date	Update
12/15/2023	<ul style="list-style-type: none"> • Updated Self-Sufficiency Policy to reflect 2024 Federal Poverty Guidelines.

Individual Training Accounts

Date	Update
12/15/2023	<ul style="list-style-type: none"> • Revised policy to limit funding for Commercial Drivers' License (CDL) training programs to \$3,750 per ITA, a decrease from the current cap of \$5,000 per ITA. • Established a maximum amount of ITAs that may be issued per training program during a 12- month period. The following policy language has been added to P4W's ITA Policy: <i>"A maximum of 30 individual training accounts may be issued per training program on the Eligible Training Provider List (ETPL) during a 12-month program year (July - June). Actual ITA funding amounts will be determined through the ITA agreement established with the training provider."</i>
1/22/2024	<ul style="list-style-type: none"> • Edited eligibility language to reflect the policy now having multiple ITA caps.

Eligibility

Date	Update
02/25/2025	<ul style="list-style-type: none"> • Updated Eligibility Policy to reflect Federal and State Guidelines on the use of self-certification/self-attestation. • Added subsection on secondary eligibility review requirements to align with PA Department of Labor & Industry Guidance Regarding Supervisory/ Second Level Review of Eligibility Determinations

SELF-CERTIFICATION FORM

IDENTIFYING INFORMATION			
Applicant's Name: _____			
Last	First	MI	
Address: _____			

Participant ID: _____		Application Date: _____	

I HEREBY CERTIFY UNDER PENALTY OF LAW, THAT THE FOLLOWING INFORMATION IS TRUE:

I ATTEST THAT THE INFORMATION STATED ABOVE IS TRUE AND ACCURATE AND UNDERSTAND THAT THE ABOVE INFORMATION, IF MISREPRESENTED, OR INCOMPLETE, MAY BE GROUNDS FOR IMMEDIATE TERMINATION AND/OR PENALTIES SPECIFIED BY LAW.

 APPLICANT'S SIGNATURE/DATE

 APPLICANT'S PHONE NUMBER

 APPLICANT'S ADDRESS

 SIGNATURE OF PARENT OR GUARDIAN (as needed)

The above Self-Certification is being utilized for verification of the following eligibility criteria:

CERTIFICATION
I certify that the individual whose signature appears above provided the information recorded on this form.
Counselor's Signature/Date: _____
Reviewer's Signature/Date: _____

WIOA TELEPHONE VERIFICATION/DOCUMENT INSPECTION FORM

IDENTIFYING INFORMATION			
Applicant's Name _____	_____	_____	_____
	Last	First	MI
Participant ID _____	Date: _____		_____

WIOA ELIGIBILITY VERIFICATION BY TELEPHONE

NAME AND/OR NUMBER OF DOCUMENT _____

ELIGIBILITY ITEM(S) TO BE VERIFIED: _____
INFORMATION VERIFIED: _____
AGENCY PROVIDING VERIFICATION: _____
AGENT VERIFYING ELIGIBILITY ITEM: _____
DATE AND TIME OF VERIFICATION: _____
TELEPHONE NUMBER OF AGENCY PROVIDING VERIFICATION: _____

WIOA ELIGIBILITY VERIFICATION BY DOCUMENT INSPECTION

NAME AND/OR NUMBER OF DOCUMENT _____

ELIGIBILITY ITEM TO BE VERIFIED: _____
INFORMATION VERIFIED: _____
DOCUMENT TO BE INSPECTED: _____
ORIGINAL SOURCE OF DOCUMENT: _____
REASON FOR DOCUMENT INSPECTION: <input type="checkbox"/> REMOTE SITE ELIGIBILITY, NO COPIER AVAILABLE.
<input type="checkbox"/> ON SITE ELIGIBILITY, NO COPIER AVAILABLE.
<input type="checkbox"/> DOCUMENT CANNOT BE COPIED

I ATTEST THAT THE INFORMATION RECORDED BY ME ON THIS DOCUMENT WAS OBTAINED THROUGH TELEPHONE CONTACT OR DOCUMENT INSPECTION ON THE ABOVE DATE. AS INDICATED BY THE AGENT, ALL INFORMATION WAS OBTAINED FROM DATA PREVIOUSLY DETERMINED AND RECORDED IN THE APPLICANT'S RECORDS AT THE AGENCY PROVIDING THE ELIGIBILITY VERIFICATION.	
OR	
I ATTEST THAT THE DOCUMENT INSPECTION VERIFIED THE PRIMARY/SECONDARY ITEMS REQUIRED TO DETERMINE ELIGIBILITY FOR THE WIOA PROGRAM.	
_____ ELIGIBILITY SPECIALIST'S SIGNATURE	_____ DATE

**WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)
STATEMENT OF FAMILY SIZE/FAMILY INCOME**

IDENTIFYING INFORMATION		
Applicant's Name: _____		
Last	First	MI
Address: _____		

Participant ID: _____ Application Date: _____		

To be completed by WIOA Applicant with staff assistance

For use in completing this form, the definitions of FAMILY and FAMILY INCOME can be found in this attachment.

Please provide information regarding the applicant's FAMILY as requested below.

FAMILY MEMBER'S NAME	RELATIONSHIP TO APPLICANT	FAMILY MEMBER INCOME (Last Six Months)

Total Number in Family: _____	Total Income: 0
--------------------------------------	------------------------

If applicable, please complete the following information for FAMILY MEMBERS not currently residing in the applicant's residence (see instructions).

NAME	LOCATION	REASON

I attest to the best of my knowledge that the information above is true and correct.

Signature of Applicant _____ Date

CORROBORATING WITNESS – I attest to the best of my knowledge that the information is true and correct.

Name _____ Signature _____ Date _____

Address _____ City _____ State _____ Zip _____

Telephone Number _____ Relationship to Applicant _____



Complaint and Grievance Form

Full Name: _____ Date of Filing (MM/DD/YYYY): _____

Phone Number: _____ Email: _____

Provider Name: _____ Case Manager (if applicable): _____

Name of the person and/or organization you are filing a complaint/grievance against (if applicable):

Date of Incident, if available (MM/DD/YYYY): _____

The reason for my complaint or grievance is:

I have discussed this complaint or grievance with the following provider staff (please include name of staff person and date discussed):

I received the following response from provider staff:

PARTNER WORK

My complaint or grievance has not been resolved due to the following:

I believe the best course action to resolve my complaint or grievance would be the following:

SIGNATURE

Print Name: _____

Signature: _____

Date: _____

This form must be submitted by mail or email to the following:

Partner4Work Compliance Manager
650 Smithfield St
Centre City Tower, Suite 2400
Pittsburgh, PA 15222
grievances@partner4work.org

WIOA TITLE I YOUTH POLICY MANUAL



EFFECTIVE DATE: FEB 25, 2025
PARTNER4WORK PITTSBURGH, PA

Contents

OVERVIEW.....	4
PARTNER4WORK.....	4
WIOA BACKGROUND.....	4
WIOA YOUTH.....	4
PURPOSE OF MANUAL.....	5
AUDIENCE/ RESPONSIBLE PARTIES.....	5
WIOA YOUTH ELIGIBILITY.....	5
ADDITIONAL ELIGIBILITY REQUIREMENTS FOR IN-SCHOOL YOUTH (ISY).....	5
ADDITIONAL ELIGIBILITY REQUIREMENTS FOR OUT-OF-SCHOOL YOUTH (OSY).....	6
SELECTIVE SERVICE REQUIREMENTS.....	6
PRIMARY ELIGIBILITY REVIEW.....	7
SECONDARY ELIGIBILITY REVIEW.....	7
SELF-CERTIFICATION.....	7
WIOA YOUTH SERVICES.....	9
SUPPORTIVE SERVICES.....	12
SUPPORTIVE SERVICE REQUIREMENTS.....	12
WIOA SUPPORTIVE SERVICE AVAILABILITY.....	13
DISALLOWED SUPPORTIVE SERVICES.....	14
SERVICE CODES FOR SUPPORTIVE SERVICES.....	14
YOUTH PAYMENTS.....	15
GENERAL REQUIREMENTS.....	15
INCENTIVE REQUIREMENTS.....	16
STIPEND REQUIREMENTS.....	16
YOUTH WORK EXPERIENCE.....	17
ELIGIBILITY.....	17
PROCEDURES.....	18
FOLLOW-UP SERVICES.....	18
POLICY EXCEPTIONS.....	19
PROGRAM/PROVIDER PERFORMANCE.....	19
DATA ENTRY & CASE MANAGEMENT.....	19
CASE NOTES AND SERVICE CODES.....	20
PERFORMANCE MEASURES.....	20

PERSONALLY IDENTIFIABLE INFORMATION.....	21
KEY TERMS	21
REQUIREMENTS.....	22
COMPLAINT & GRIEVANCE POLICY.....	23
BACKGROUND	23
POLICY	23
GLOSSARY OF TERMS	25
REFERENCES	29
ELIGIBILITY.....	29
WIOA YOUTH PROGRAM ELEMENTS	29
SUPPORTIVE SERVICES	29
INCENTIVES	29
STIPENDS.....	30
YOUTH WORK EXPERIENCE	30
FOLLOW-UP SERVICES.....	30
PERSONALLY IDENTIFIABLE INFORMATION	30
COMPLAINT & GRIEVANCE POLICY	30
POLICY UPDATES	30
SELF CERTIFICATION FORM	APPENDIX A
TELEPHONE VERIFICATION/DOCUMENT INSPECTION FORM	APPENDIX B
COMPLAINT & GRIEVANCE FORM	APPENDIX C
ISY ELIGIBILITY DOCUMENT LIST	APPENDIX D
OSY ELIGIBILITY DOCUMENT LIST	APPENDIX E

OVERVIEW

PARTNER4WORK

Partner4Work (P4W), formerly Three Rivers Workforce Investment Board, was established by the Workforce Investment Act of 1998 (WIA) and was later reauthorized by the Workforce Innovation and Opportunity Act in 2014 (WIOA). In its 20+ years, Partner4Work has delivered innovative solutions and supported local partners to develop a thriving workforce in Allegheny County and the City of Pittsburgh. From its initial focus as a small think tank, P4W has evolved its focus to include the development of strategic and systemic workforce solutions and funding key workforce partners including PA CareerLink(R) Pittsburgh/Allegheny County. With a budget comprised of public and private workforce funds, Partner4Work delivers a comprehensive portfolio of programs and initiatives to meet the current and future needs of employers and job seekers.

Our Vision

Partner4Work envisions a thriving and prosperous community, where all residents have access to expansive career opportunities and all businesses have access to a talented workforce.

Mission

To develop a thriving workforce, Partner4Work drives and delivers strategic investments, provides expertise, and creates opportunities for businesses, job seekers, agencies, and policymakers in Allegheny County and the City of Pittsburgh.

To find out more about Partner4Work: www.partner4work.org

WIOA BACKGROUND

WIOA provides the framework for a national workforce preparation system that is flexible, responsive, employer-driven, customer-focused, and locally managed. The Act integrates workforce development programs to better respond to the employment needs of workforce system customers—employers and job seekers. The WIOA system is built around several key principles:

- **Streamlining Services:** Integrating multiple employment and training programs at the customer level through the one-stop delivery system to simplify and expand services for job seekers and employers.
 - **Empowering Individuals:** Customers will be empowered to name the skills they possess and obtain the services and skills they need to enhance their employability.
 - **Universal Access:** Through the one-stop system, every customer will have access to a set of core employment-related services.
 - **Increased Accountability:** Providers of services will be held accountable for meeting employment-related performance measures.
 - **Local Oversight:** Local boards (such as Partner4Work) with involvement from the private sector are responsible for program planning and oversight of the local system.
-
- **Local Flexibility:** WIOA provides local flexibility to improve and encourage innovative and comprehensive workforce investment systems. Local partners play a key role in policy development that is customized to meet the needs of local markets.
 - **Improved Youth Programs:** WIOA seeks to expand youth programs by encouraging a close connection to the local labor market and communities with strong linkages between academic and occupational learning.

WIOA YOUTH

The allocation of funding toward youth career and training services is an integral part of the Workforce Innovation and Opportunity Act of 2014. Title I of this act provides for the commitment of youth engagement, supplying guiding principles for complex service provision for young people aged 14-24 who face systemic barriers to education, training, and employment.

The WIOA Youth Program focuses on assisting out-of-school youth and in-school youth with one or more identified barriers as they prepare for employment and postsecondary education opportunities, attain educational and/or skills training credentials, and secure employment with career/promotional opportunities. These services are made possible through federal funding allocated toward the states, and subsequently passed through Local Areas/LWDBs to deliver comprehensive youth services through regional, competitively procured providers.

PURPOSE OF MANUAL

This manual provides policy and procedure guidance for Partner4Work (P4W) partners and subgrantees delivering Workforce Innovation and Opportunity Act (WIOA) Title I Youth programming and services in Allegheny County and the City of Pittsburgh. These policies are to be used when determining eligibility and providing services funded by WIOA; their implementation is the responsibility of Title I program and Partner4Work staff.

AUDIENCE/ RESPONSIBLE PARTIES

These policies apply to all Allegheny County/Pittsburgh WIOA Title I Youth participants and to individuals interested in enrolling in these programs.

Allegheny County/Pittsburgh WIOA Title I Youth staff and Partner4Work staff are responsible for implementing these policies.

WIOA YOUTH ELIGIBILITY

This section ensures every participant who receives WIOA Title I Youth program funded services is eligible and registered to receive those services.

Disclaimer: This manual contains language regarding eligibility criteria as it appears in the WIOA legislation. However, Partner4Work encourages providers to utilize person-centered language, where possible. For example, “individual with a criminal background” or “individual experiencing homelessness” may be used in place of “an offender” or “homeless individual”, respectively.

Both In-School Youth (ISY) and Out-of-School Youth (OSY) must meet the following eligibility requirements:

- Be a citizen or noncitizen authorized to work in the U.S.; and
- Meet selective service registration requirements (individuals assigned male at birth only, if applicable)

ADDITIONAL ELIGIBILITY REQUIREMENTS FOR IN-SCHOOL YOUTH (ISY)

- An individual who is between 14 and 21 years of age;
- An individual who is [attending school](#), including secondary and post-secondary school (as defined

by State law)

- A [low income individual](#); and
- One or more of the following:
 - [Basic skills deficient](#);
 - An English language learner;
 - An [offender](#);
 - A [homeless](#) individual;
 - Pregnant or parenting;
 - A youth who is an individual with a disability;
 - An [individual who requires additional assistance to complete an educational program or to secure or hold employment](#) (see Definition of Key Terms section). No more than five (5) percent of ISY served by Partner4Work in a program year may be deemed eligible based on this criterion.

ADDITIONAL ELIGIBILITY REQUIREMENTS FOR OUT-OF-SCHOOL YOUTH (OSY)

- An individual who is [not attending any school](#) (including secondary or postsecondary);
- An individual between the ages of 16 and 24 years of age; and
- One or more of the following:
 - A school dropout;
 - A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter;
 - A recipient of a secondary school diploma or its recognized equivalent who is a [low-income individual](#) and is—
 - [Basic skills deficient](#); or
 - An English language learner
 - An individual who is subject to the juvenile or adult justice system;
 - A [homeless individual](#), a runaway, an individual in foster care, or an individual who has aged out of the foster care system;
 - An individual who is pregnant or parenting;
 - A youth who is an individual with a disability;
 - A low-income [individual who requires additional assistance to enter or complete an educational program or to secure or hold employment](#)

An eligible ISY or OSY who has their high school diploma or GED and who is [basic skills deficient](#) or an English language learner must also meet the WIOA definition of [low-income](#). Up to five (5) percent of youth registered may be classified as not low income but meet the other eligibility requirements. Requests to enroll youth who are not low income must be approved by Partner4Work.

SELECTIVE SERVICE REQUIREMENTS

Every citizen and permanent resident non-citizen in the United States, who were assigned male at birth, and are between the ages of 18 and 26, are required to register with Selective Service. Individuals who failed to register with Selective Service by their 26th birthday and can provide written explanation and supporting documentation of any of the following may be eligible for WIOA services:

- Over the age of 26 and were willing but unknowing of the requirement to register with Selective Service;
- Incarceration, institutionalization, or hospitalization between the ages of 18-26; OR
- Non-citizen status and non-permanent resident status before age 26.

Partner4Work will monitor Selective Service exceptions to ensure that proper procedures are followed.

PRIMARY ELIGIBILITY REVIEW

WIOA Youth staff must verify participant eligibility prior to the provision of services. It is the WIOA Youth provider's responsibility to review and sign off on all registration paperwork for completeness and accuracy. The provider must maintain a centrally controlled file for each program applicant and registrant which contains copies of all documents collected, and will provide Federal, State, and Partner4Work monitors with access to such records given reasonable notice. The following differences between verification and documentation should be noted:

- **Verification** means to confirm eligibility requirements through examination of documents (e.g., birth certificates or public assistance records) or speaking with representatives of authorized agencies.
- **Documentation** means to maintain physical evidence, which is obtained during the verification process, in participant files. Examples of such evidence are copies of documents (where legally permitted).

The Commonwealth Workforce Development System (CWDS) is the sole system of record for WIOA participant data. All data and documentation for tracking participants' registration and eligibility must be entered into CWDS by Youth Program staff. **This checklist** may be used to determine which documents verify eligibility.

SECONDARY ELIGIBILITY REVIEW

To ensure accurate and compliant eligibility determinations under WIOA, all eligibility decisions must undergo a secondary staff review before enrollment. The primary reviewer is responsible for collecting and verifying all necessary documentation, while a secondary reviewer, such as a supervisor or authorized staff member, must conduct a second-level review to confirm accuracy and completeness before enrollment. This review must be clearly documented, including the name of the reviewer, their signature, the date of review, and any necessary corrections. Any secondary review documentation must be kept in the appropriate file.

If discrepancies are found, the eligibility application must be returned for correction before approval, and all identified issues must be resolved prior to final enrollment. P4W will conduct regular monitoring to ensure adherence to this policy, and staff training will be provided as needed to maintain compliance.

SELF-CERTIFICATION

WIOA Youth programs should consider [self-certification](#) as a viable alternative for populations whose life circumstances may preclude immediate access to certain eligibility documents. In compliance with federal and state policy requirements, self-certification may be used when document collection would delay or prevent a customer from enrolling into a program and moving ahead with services.

Self-certification should not be used as a primary source of verification if other documentation can be obtained without a significant delay or undue hardship to the participant. If self-certification is used, a case progress note must document the circumstances that necessitated the use of the self-certification including what action steps were taken to obtain other primary sources of documentation. Case progress notes must be entered into the state's sole system of record, the Commonwealth Workforce Development System (CWDS).

Sample case note: The WIOA self-certification form was submitted to verify "Homeless Youth". The participant did not have any other documentation available to verify this eligibility criteria. We are utilizing the self-certification form because no other options for verification are readily available or reasonably attainable.

Telephone Verification

Providers are encouraged to use telephone verification prior to self-certification for participants where practical. Telephone verification involves verification of eligibility criteria through phone calls with recognized governmental or social services agencies. Information obtained through this method should be documented on the attached [Telephone/Document Inspection Verification Form](#). Information recorded must be adequate to enable a monitor or auditor to report back to the cognizant agency or the document used. In some cases, the information provided by the agency through telephone contact may be sufficient to satisfy multiple eligibility criteria. Verification of eligibility through document inspection is appropriate when documents cannot or may not be copied.

Self-Certification List

Workforce staff must use self-certification in a manner reflective of this policy guide. Self-certification may be used for criteria elements including, but not limited to, the following

- Date of Birth
- Individual with a Disability
- Veteran Status
- Low Income Status at Program Entry
- English Language Learner
- Homeless
- In/Aged Out of Foster Care System
- Offender
- Pregnant or Parenting
- Requires Additional Assistance
- School Status at Time of Registration

The only data element related to Title I Youth eligibility that does not permit the use of self- attestation as acceptable documentation is eligibility barrier: “basic skills deficient”. For comprehensive detail and a listing on data validation and documentation requirements, including where self-certification may be used, review US Department of Labor Training and Employment Guidance Letter (TEGL) 23-19, Change 2, *Guidance for Validating Required Performance Data Submitted by Grant Recipients of USDOL Workforce Programs*.

Random Sampling Methodology

To verify applicant self-certification usage, Partner4Work will adopt a random sampling methodology. The methodology will verify eligibility in self-attested applications and will be implemented for all Title I programs.

Based on previous experience, Partner4Work estimates that less than 1% of participants report incorrect information when self-attesting on application forms. For the purposes of ensuring the validity of self-attested data, Partner4Work will use a 90% confidence interval and 5% margin of error. A random sample of the population utilizing self-attestation will be selected to verify if the information those individuals reported is correct. The size of the sample depends on the size of the population and is outlined in the table below. Population will be measured by funding stream (e.g. all OSY) and not by individual provider. Participants selected through the random sampling methodology will be notified at the time of monitoring and required to provide additional eligibility documentation.

Population Size and Random Sample Size

Population Size	Random Sample Size
25	8

50	9
75	9
100	10
200	10
300	10
400	10
500	14
750	20
1000	26

If more than 10% of examined participants are found to be ineligible, Partner4Work will take corrective action, including providing technical assistance to providers utilizing [self-certification](#) as a form of eligibility.

Note: As a best practice, once enrolled, programs should assist the participant in obtaining required documents (i.e. birth certificate, photo identification) through the use of supportive service funds as these documents are likely needed for employment.

WIOA YOUTH SERVICES

WIOA Section 129(c)(2) describes 14 program elements that must be made available to youth participants. Providers must ensure youth participants have access to all 14 program elements either through direct service or referral partnerships. Program providers are not required to directly deliver all 14 elements; however, providers **must** directly deliver elements 3, 7, 8, 9, and 13, at a minimum. These elements are shaded below.

WIOA PROGRAM ELEMENT	DESCRIPTION
1. Tutoring, study skills training, and instruction leading to the completion of secondary school, including dropout prevention strategies;	These services focus on academic support, assisting with learning obstacles, and can be provided one-on-one, in a group setting, or through resources and workshops.
2. Alternative secondary school services or dropout recovery, as appropriate;	“Dropout recovery” refers to services attempting to reengage students, who may have dropped out, through credit recovery, counselling, and educational plan development.
3. Paid and unpaid work experience that links academic and occupational education, employment opportunities, pre-apprenticeship programs, internships and job shadowing, and on the job training;	Work experiences are a planned, structured learning experience that takes place in a workplace for a limited period. Work experience may be paid or unpaid, and may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship exists, as defined by the Fair Labor Standards Act or applicable State law.
4. Occupational skills training,* as appropriate; particularly training that leads	Occupational skills training is defined as an organized program of study that provides

<p>to industry recognized credentials aligned with in-demand industry sectors;</p>	<p>specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Such training must:</p> <ol style="list-style-type: none"> (1) Be outcome-oriented and focused on an occupational goal specified in the individual service strategy; (2) Be of sufficient duration to impart the skills needed to meet the occupational goal; and (3) Lead to the attainment of a recognized postsecondary credential. <p>*When youth are enrolled in academic or occupational skills training in WIOA programs, they must be assisted in earning an industry recognized credential and demonstrating a measurable skill gain.</p>
<p>5. Education* offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;</p>	<p>This program element reflects an integrated education and training model and describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway.</p> <p>*When youth are enrolled in academic or occupational skills training in WIOA programs, they must be assisted in earning an industry recognized credential and demonstrating a measurable skill gain.</p>
<p>6. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors, as appropriate;</p>	<p>Leadership development opportunities are opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors such as:</p> <ol style="list-style-type: none"> (a) Exposure to postsecondary educational possibilities; (b) Community and service learning projects; (c) Peer-centered activities, including peer mentoring and tutoring; (d) Organizational and team work training, including team leadership training; (e) Training in decision-making, including determining priorities and problem solving; (f) Citizenship training, including life skills training such as parenting and work behavior training; (g) Civic engagement activities which promote the quality of life in a community; and (h) Other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee.

	(CFR § 681.520)
7. Supportive services	The term " Supportive Services " means services such as transportation, clothing and/or uniforms, equipment/tools, drug testing and/or TB testing, and reasonable accommodations for individuals with disabilities, that are necessary to enable an individual to participate in activities authorized under WIOA. Supportive services are also able to be provided and expenses incurred for youth in follow up.
8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;	(a) Adult mentoring for youth must: <ul style="list-style-type: none"> (1) Last at least 12 months and may take place both during the program and following exit from the program; (2) Be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee; and (3) While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis. (b) Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.
9. Follow-up services	Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services may include regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise. Partner4Work requires that follow-up services for WIOA Youth participants include at a minimum quarterly contact with each participant for a full 12 months following the program exit date.
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;	"Comprehensive guidance and counseling" provides individualized counseling to participants . In addition to drug and alcohol, this may include counseling for mental health, or a coordinated referral to an appropriate partner. If referred, coordination between provider and agency is necessary for continuity of service.
11. Financial literacy education;	Activities included in this program element may support in the ability to create budgets, initiate checking and savings accounts at banks, manage spending, and teach participants about the significance of credit scores.

12. Entrepreneurial skills training;	Entrepreneurial skills training provides the basics of starting and operating a small business. Skills associated with entrepreneurship may include: 1) Taking initiative 2) Creatively seeking out and identifying business opportunities and 3) Developing budgets.
13. Services that provide labor market information, such as career awareness, counseling, and exploration;	"Labor market information" includes the identification and/or analysis of topics such as employment, unemployment, local employment dynamics, and occupational projections.
14. Activities that help youth prepare for and transition to post-secondary education and training.	"Preparing for post-secondary education and training" may include SAT/ACT test preparation, exploring education options including technical training schools and community colleges, or providing support with financial aid applications.

SUPPORTIVE SERVICES

Supportive Services are intended to enable individuals to participate in WIOA activities. This section ensures appropriate and necessary [supportive services](#) to assist program [participants](#) are available in full compliance with the Workforce Innovation and Opportunity Act and its associated regulations.

SUPPORTIVE SERVICE REQUIREMENTS

The following are supportive service eligibility requirements for youth participants:

- Participant must be a WIOA eligible youth participant.
- Participant must be unable to obtain supportive services through other programs providing such services.
- Supportive services may only be awarded when necessary to enable participation in WIOA career services or training activities.

The WIOA Title I Youth program staff should meet with each participant to assess the need for supportive services. Each participant should be given individualized case management services and plan development in order to eliminate possible dependency on supportive services. Supportive services awards should be based on individual participant needs and plan development. This information should be properly documented in the ISS and case notes in the Commonwealth Workforce Development System. Per WIOA, supportive services may only be awarded when necessary to enable participation in WIOA career services or training activities. A supportive service shall qualify as "necessary to enable participation in WIOA career services or training services" if staff determine, following a needs assessment and IEP development, that a supportive service would help a participant successfully participate in a WIOA activity and/or achieve a goal established in their ISS. P4W funds must be used in accordance with the requirements of the Federal Uniform Guidance and all other guidance and regulations applicable to the funding source.

WIOA funds are intended to be used to provide supportive services when they are not readily available through other resources and service providers. WIOA Title I Youth program staff are responsible for coordinating services and providing referrals to other state and local agencies offering supportive services. WIOA-funded supportive services shall be permitted, in accordance with this policy, if it is determined by WIOA program staff that a referral to other resources or service providers is not possible or cannot be made within the timeframe needed by the participant. Staff must provide documented proof of the service being unavailable in the area through other resources, such as PA 211 Southwest

(<http://pa211sw.org/>). Additionally, staff must document the participant's case notes that the service was confirmed as unavailable outside of WIOA.

WIOA SUPPORTIVE SERVICE AVAILABILITY

Partner4Work will only provide funding for the below list of supportive services. WIOA Title I program staff will determine the need for supportive services and monitor the customer's progress and status to assess ongoing need.

- 1) **Transportation** – Supportive services funds may be used to cover certain transportation costs, including
 - a. Bus passes, not exceeding Pittsburgh Regional Transit monthly fare;
 - b. Gas cards, not exceeding \$75 per week; The amount allowable for assistance is determined by the mileage to and from work or training, confirmed by [Google Maps](#), at the [established federal rate](#). Mileage verification must be documented and maintained in the participant's file. Providers must use the table below for distribution:

Weekly Travel	5-30 miles	31-75 miles	76+ miles
Gas Card Amount	\$25	\$50	\$75

- c. Ridesharing (Uber, Lyft, etc.) vouchers, not exceeding \$60 per week. For a ridesharing voucher to be issued to a participant, one or more of the criteria below must be met. Service providers may refer to Pittsburgh Regional Transit public transportation schedules or other services (e.g. Google Maps) to verify and document that these criteria are met.
 - i. The overall travel time to/from the destination by public transit would be 1 hour or more in either direction;
 - ii. The public transit route to/from the destination would require more than one transfer in either direction;
 - iii. The final bus stop on the route (to/from) is more than 1/2 of a mile from the destination or does not have a clear pedestrian route to the destination (e.g. lack of sidewalks); or
 - iv. The bus schedule for the route (to/from) the destination would require a wait time of 30 minutes or more at a bus stop or shows no buses running during the required travel time.
- 2) **Childcare:** Participants may receive support for childcare expenses during hours required for participation when necessary for participation in services. To qualify, participants must first apply for support through the Pennsylvania Department of Human Services (DHS) subsidized childcare program, Child Care Works. The annual income for a family to be eligible to receive a subsidy is 200 percent or less of the Federal Poverty Income Guidelines (FPIG); work hour, education hour, and child age requirements must also be met.
 - a. Funds may be used to cover childcare costs when participating in this subsidized childcare program, including childcare costs incurred if placed on the waitlist for the program. Supportive services funding may also be used to provide support for childcare expenses for participants who meet income eligibility criteria for Child Care Works (PA's subsidized childcare program), but do not qualify based on other criteria.
 - b. Individuals disqualified from Child Care Works due to family income exceeding 200 percent may still qualify for supportive service funds if the following criteria are met.
 - i. Staff determine such resources are necessary to enable participation; and
 - ii. Participant family income falls under 300 percent of the FPIG.
- 3) **Clothing and/or uniform:** A WIOA participant may receive one (1) voucher for up to \$100 to purchase clothing and/or a uniform(s) necessary for participation in training, a job interview, or

the first week of employment if these items are not provided by the training provider or employer.

- 4) **Equipment/tools:** A WIOA participant may receive one (1) voucher for up to \$250 to cover the costs of tools and/or equipment necessary for participation in training or the first week of employment if these items are not provided by the training provider or employer.
- 5) **Driver's license or state identification card:** A WIOA participant may receive supportive services funds for one (1) instance of the cost of obtaining a state driver's license or identification card. Supportive service funds may not be used to pay for the costs of fines, penalties, or legal fees associated with obtaining or reinstating a driver's license.
- 6) **Non-employer paid licensing/certification or educational testing fees-** A WIOA participant may receive funding for a maximum of two (2) instances of the same license/certification or test utilizing WIOA supportive services dollars. WIOA Title I program staff will determine the need for licensing or testing through employer demand. The staff will make the necessary arrangements with the vendor for payment. The cost of GED testing and/or obtaining GED transcripts may be covered under this supportive services category.
- 7) **Drug Testing and/or TB Testing:** A WIOA participant may have one (1) instance of a drug test and/or TB test paid for through WIOA supportive services dollars.
- 8) **Criminal Background Checks and/or Clearances—** A WIOA participant may have one (1) instance of obtaining a criminal background check and/or clearances necessary to begin employment and/or education paid through WIOA supportive services dollars. This includes one (1) instance of each of the following: Pennsylvania Child Abuse History Clearance, Pennsylvania State Police Criminal Record Checks, and Federal Bureau of Investigations (FBI) Criminal History Background Check.
- 9) **Unions and Registered Apprenticeships Fees:** A WIOA participant applying to a union and/or registered apprenticeship may receive assistance for non-employer paid, non-refundable costs required for initial admittance or participation in the program. These costs may include application fees, initial dues (one month only), and/or required clothing/shoes. Supportive services funds may only be used if the expenses are a requirement for participation in training and/or a reasonable condition of employment.
- 10) **Reasonable accommodations for individuals with disabilities —**WIOA supportive services dollars may only be used as the funding of last resort for these accommodations.

DISALLOWED SUPPORTIVE SERVICES

The following are prohibited to be purchased with WIOA supportive service funds. This list is not exhaustive.

- Supportive services purchased prior to the participant's program enrollment.
- Fines and penalties such as traffic violations, late fees, and interest payments.
- Entertainment, including tips.
- Contributions or donations.
- Titled or deeded items or when recovery of the expense is anticipated.
 - Examples include: Rent or housing deposits, mortgage payments, homeowners insurance, property taxes, car payments, purchase of vehicles
- Alcohol or tobacco products.

SERVICE CODES FOR SUPPORTIVE SERVICES

Each supportive service provided has a corresponding service code, which you will find below to ensure accurate entry into CWDS.

WSS01	Transportation
WSS02	Childcare
WSS03	Dependent Care
WSS04	Housing
WSS05	Needs Related Payments
WSS06	Needs Based Payments
WSS07	Stipend
WSS08	Assistance With Uniforms Or Other Appropriate Work Attire and Work-Related Tool Costs, Including Such Items As Eyeglasses and Protective Eye Gear
WSS09	Other 1 - Driver's License & State Identification Card
WSS10	Other 2 - Non-employer paid licensing/certification or educational testing fees or Drug Testing and/or TB Testing
WSS11	Other 3 - Criminal Background Checks and/or Clearances
WSS12	Other 4 - Unions and Registered Apprenticeships Fees
WSS13	Other 5 - Reasonable accommodations for individuals with disabilities

YOUTH PAYMENTS

WIOA Youth allows for several forms of payments to be made available to program participants in the form of incentives, stipends, and wages. The following section articulates the distinction between these payments, and how incentives and stipends are permitted to be provided to participants enrolled in Partner4Work funded youth programs.

INCENTIVES	STIPENDS	WAGES
Incentive payments are awarded to participants in recognition of a measurable achievement directly tied to training activities or work experiences. Incentive payments must be awarded in response to a specific outcome achieved (e.g. credential attainment, job placement, placement in post-secondary education).	Stipends are predetermined, fixed payments that may be awarded to individuals for participation or attendance in training or work experience activities. Stipends are based on levels of program participation or attendance met. Stipends are not considered income for WIOA eligibility purposes, are not required to meet minimum wage requirements, are not dispersed as payroll, and income tax is not withheld.	A wage is generally a payment for services rendered where an employer/employee relationship exists. This form of compensation is usually paid through a payroll system and is subject to the taxes applicable to the employer of record and participants. Paying a wage usually indicates that a program views the youth as an employee.

GENERAL REQUIREMENTS

Incentives and stipends must be provided in accordance with all federal, state, and local policies and requirements applicable to the program and/or funding stream. Each Partner4Work funded program that utilizes these must maintain a written policy that outlines a uniform and consistent strategy for issuing payments to program participants. Providers must submit this policy to Partner4Work for approval prior to issuing incentives or stipends for a program. Incentives and stipends must also be approved and budgeted for during the contracting process.

INCENTIVE REQUIREMENTS

Programs interested in providing incentives must receive approval from Partner4Work. Incentives must be permitted under all federal, state, and local policies and requirements applicable to the program and/or funding stream. Partner4Work will also consider other factors, including but not limited to funding availability and how incentives align with and support the achievement of program goals.

The following are the eligibility requirements for providing incentive payments:

- Participants must be active and in good standing with a program.
- Participants must be enrolled in an approved training program or be actively participating in work experience.
- Participants must have achieved an outcome listed as a goal within their individual service strategy (ISS).

At a minimum, the provider's incentive policy must include:

- The method, justification, and amounts for the issuance of incentives;
- The method by which gift cards for incentives are purchased (e.g. with a purchasing card), if applicable;
- The method by which gift cards for incentives are stored, if applicable; and
- The internal controls for incentive awards, including the staff responsible for approving an incentive.

Programs may not award direct cash payments to participants as part of an incentive strategy. The maximum amount permitted per incentive issued to a participant is \$100. Incentives must be administered in a manner that ensures all participants receive equal awards for equal achievements. Participants cannot receive multiple incentives for the same program achievement. Incentives must not include entertainment costs, such as movie or event tickets or gift cards to movie theatres.

Incentive payments may only be awarded in recognition of an achievement directly tied to training or work experience and must align with the goals of the program and participant goals in the ISS or [IEP](#). Examples include obtaining a GED, placement in employment, and retention of a job for 90 days. Funds may not be used for incentive payments issued as motivation for activities such as recruitment, submission of documentation, or completion/review of an ISS or IEP.

At least three individuals must sign off to indicate that an incentive has been awarded: two staff members of the service provider, who are familiar with incentive policy requirements, and the participant receiving the incentive.

The provider's written incentive policy must clearly describe this process. Providers may not have more gift cards on hand than enrolled participants at any given time (i.e. if a program has 25 enrolled participants, no more than 25 gift cards can be on hand at once. If a program has 100 enrolled participants, no more than 100 gift cards can be on hand at a time). Partner4Work encourages providers to limit the number of gift cards stored on site when possible. Providers should maintain a consistent method for purchasing gift cards where possible (e.g. purchasing card or company credit card).

Organizations providing incentives to participants should be aware of any implications under IRS provisions. Please consult www.irs.gov for more information. It is the responsibility of the service provider to maintain required documentation detailing the distribution and management of incentives.

STIPEND REQUIREMENTS

The following are the eligibility requirements for stipends:

- Participants must be active and in good standing with a program.

- Participants must be enrolled in a training program or be actively participating in work experience.
- Participants must meet the participation or attendance requirements established in the provider's written policy for issuing stipends.

At a minimum, the provider's stipend policy must include:

- The justification for providing stipends and the specific attendance/participation levels that must be met for the issuance of stipends;
- The amount and method of payment for the issuance of stipends; and
- The internal controls for stipend payments, including but not limited to how participation/attendance will be documented and verified, and the staff responsible for approving the issuance of a stipend.

Stipend payments must only be issued for participation/attendance in training when there is a defined curriculum and criteria for completing the curriculum. Stipends may be issued for work experience, but must not replace wages when a wage is required to be paid. Stipends must only be issued for activities aligned with the goals of the program and participant goals outlined in the individual service strategy (ISS) or individual employment plan (IEP). Stipends must be administered in a manner that ensures all participants receive equal payments for equal levels of participation/attendance. Stipends must be based on levels of program participation or attendance, as defined in the provider's stipend policy (e.g. Attendance must be at 90% or above based on a nine-week grading period). Unlike a wage, stipends should **not** be based on an hourly rate. Providers are responsible for documenting participation/attendance in the activity as the basis of stipend payments.

At least three individuals must sign off to indicate that a stipend has been awarded: two staff members of the service provider, who are familiar with stipend policy requirements, and the participant receiving the stipend. The provider's written stipend policy must clearly describe this process. It is the responsibility of the service provider to maintain all records of participation/attendance (e.g. timesheets or attendance sheets) and the issuing of stipends (e.g. signed stipend approval forms). This information should be documented in the participant's case file.

Organizations providing wages or stipends to participants should be aware of any implications under IRS provisions. Please consult www.irs.gov for more information.

YOUTH WORK EXPERIENCE

Steadfast in the belief that youth learn to work by working, Partner4Work requires youth providers to use WIOA funds to assist youth in obtaining paid and unpaid [work experience](#) while enrolled in programs. This section sets requirements for employer participation in paid and unpaid work experience.

ELIGIBILITY

Participant Eligibility

All youth participants enrolled in WIOA services are eligible for participation in work experience activities, provided the activities are deemed in line with the individual's career plan and service strategy.

General Work Experience Employer Eligibility

Potentially eligible companies able to participate in youth work experience include: for profit businesses, non-profit organizations, and public sector employers. Partner4Work youth providers are responsible for ensuring that the on-site supervisors of all youth participants placed in paid or unpaid work experience have all applicable child abuse and criminal background check clearances.

Paid Work Experience Employer Eligibility

The provider organization with which the youth is enrolled serves as the employer of record and is

responsible for ensuring that wages are paid on time and in full. Non-profit, for-profit, and public entities are eligible to serve as paid work experience sites. A company will not be eligible to host a youth participant for work experience if:

- 1) The company has any other individual on layoff from the same or substantially equivalent positions.
- 2) The youth paid work experience would infringe upon the promotion or displacement of any currently employed worker or cause a reduction in their hours.
- 3) The same or a substantially equivalent position is open due to a hiring freeze.
- 4) The employer is a private for-profit employment agency, i.e. temporary employment agency, employee leasing firm, or staffing agency.

PROCEDURES

Provider must spend at least 25% of WIOA youth funding on paid or unpaid work experience, which may include staff time to develop and manage work experience opportunities or related wages and supportive services;

Partner4Work encourages providers to enroll youth in paid work experience where possible. Youth participants in work experience must have an up-to-date Individual Service Strategy reflecting the need for work experience.

Employer Requirements

With assistance from youth contractor staff, participating employers must guarantee that:

- 1) The training to be provided will be in accordance with the Workforce Innovation and Opportunity Act (WIOA) 181(a)(1)(A), and 683.275 for wage and labor standards. Worker protection requirements are set forth in WIOA Sections 181(a) (1) (A) and (B), (b) (2), (3), (4) and (5) and 188.
- 2) All applicable child labor laws are followed.
- 3) The employer agrees to cooperate with monitoring efforts as required by WIOA legislation and adhere to all other applicable local, state and federal rules and regulations.
- 4) Ensure funds are not used to directly or indirectly assist, promote, or deter union organizing.
- 5) Employers must agree to respond to workforce development system staff requests for wage and retention information of participants.
- 6) Employers are expected to provide a job description before the start of the work experience and complete an exit survey upon completion of the work experience.

General Requirements

- 1) Per WIOA regulations (20 CFR 683.200(g)), “no individual may be placed in an employment activity if a member of that person’s immediate family is directly supervised by or directly supervises that individual.” For the purpose of this policy, the term “immediate family” includes a spouse, child, son-in-law, daughter in-law, parent, mother-in-law, father-in-law, sibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, and grandchild.
- 2) Provider costs of administering paid and unpaid work experience programs are allowable costs under this policy.

FOLLOW-UP SERVICES

Follow-up services for WIOA Title I Youth participants are critical services provided following a youth’s exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services may include regular contact with a youth participant’s employer, including assistance in addressing work-related problems that arise. Follow-up services for youth also may include the following program elements:

- [Supportive services](#)
- Adult mentoring
- Financial literacy education
- Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services
- Activities that help youth prepare for and transition to postsecondary education and training

All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies. Furthermore, follow-up services must be provided to all participants for a minimum of 12 months following the participant's exit date from the program.

Partner4Work requires that follow-up services for WIOA Youth participants include at a minimum quarterly contact with each participant for a full 12 months following the program exit date. Provider staff should determine if more frequent follow-up services are needed based on the participant's individual needs and education/career goals, as documented in their individual service strategy (ISS). Staff must document each follow-up service in the Commonwealth Workforce Development System (CWDS) through both service code entry and case notes. Follow-up services must include more than only a contact attempted or made for securing documentation to report a performance outcome.

Staff may end attempts to contact participants for follow-up services if at least one of the following criteria is met:

- Staff have made reasonable attempts to contact a participant at a minimum monthly over a three-month period and the participant has not responded. Each attempt to contact must be documented in CWDS case notes. Attempts must have been made to all phone numbers associated with a participant and through at least one other medium (e.g. email, text messaging, written letter).
- A participant has notified WIOA Youth staff that they no longer need or want follow-up services or contact. This must be documented in CWDS case notes and any written notification from the participant must be kept in their case file.

POLICY EXCEPTIONS

Under limited circumstances, Partner4Work may grant exceptions to requirements within this policy. Requests for exceptions may be submitted using the [Policy Exception Request Form](#) available at www.partner4work.org.

Exception requests will be reviewed based on their allowability under any applicable legislation, regulation, and policy. Partner4Work will also consider funding availability, how an exception will lead to improved outcomes for the customer(s) being served, and other relevant factors.

PROGRAM/PROVIDER PERFORMANCE

DATA ENTRY & CASE MANAGEMENT

Once a participant has been verified as eligible, they must be entered into the official system of record for WIOA youth programs in Pennsylvania for participation to begin. The system of record for participant-level workforce development data in PA is the Commonwealth Workforce Development System (CWDS). WIOA subrecipients agree to have all case managers or other staff trained in data entry and management in CWDS. Title I Youth program staff must recognize that CWDS is the sole [system of record](#) for WIOA services in the Commonwealth and agree that all WIOA program data will be entered therein.

The Individual Service Strategy (ISS) is central to data management and tracking; it is the mechanism to describe the goals for a young person, the services they participate in to meet the goals, and the accomplishments. The purpose of a case note is to provide a narrative that explains the context or reason a client received a particular service in relation to that client's ISS; it should document client progress or setbacks, significant milestones and describe next steps. Together, the ISS, the service record, and the case notes for a participant should tell the full story of a youth's experience and provide justification for the provision of all services and opportunities.

Case management is a process of building relationships with participants, understanding clients to the extent that managers can help guide young people, and recommend services and training pathways that meet their needs. WIOA youth programs require that case management within a provider organization also includes extensive data collection and management within guidelines set in WIOA and defined by Partner4Work staff.

All case notes, assessment results, service plans and participant accomplishments must be recorded in CWDS with regular entries and updates occurring every 30 days at the latest.

CASE NOTES AND SERVICE CODES

Services delivered to individuals are tracked in CWDS through the use of CWDS service codes. The use of service codes has a direct relationship to federal reporting and WIOA performance indicators and should be evaluated closely to ensure the service provided aligns with the definition of the service code selected for entry into CWDS.

PERFORMANCE MEASURES

The effectiveness of WIOA programs is measured across the WIOA Primary Indicators of Performance codified by federal law. Provider performance across these indicators will be evaluated according to definitions, calculations and guidance from the U.S. Department of Labor, including but not limited to [TEGL 10-16](#) and [TAC \(Technical Assistance Circular\) 17-01](#), as well as related WIOA guidance and directives from the Pennsylvania Department of Labor & Industry. As a Workforce Development Board, Partner4Work is required to negotiate goals for each of these indicators periodically with the PA Department of Labor & Industry. The indicators and negotiated goals apply to the WIOA programs that Partner4Work administers across the workforce development system in Allegheny County and the City of Pittsburgh.

Beyond measures required by WIOA, Partner4Work has incorporated additional measures to provide evidence of progress towards organizational goals around integration of services. Partner4Work reserves the right to add or modify performance measures in each year's contract negotiation.

CRITERION	PERFORMANCE STANDARD
<p>Programmatic Retention The percentage of participants who start and complete the program.</p>	90%
<p>Measurable Skills Gain The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who have achieved a measurable skills gain toward such a credential or employment. Note: Participants enrolled in a program in multiple program years must demonstrate a measurable skill gain <u>each program year</u>.</p>	85%

<p>Obtainment of a Degree or Certificate The percentage of participants who have attained a diploma, a high school equivalency, or industry recognized credential within one year after exit from the program. In the case of individuals who obtain a high school diploma or its recognized equivalent, the individual must also have obtained or retained employment or must be enrolled in an education or training program leading to a recognized postsecondary credential within one year after program exit.</p>	75%
<p>Placement upon Exit The percentage of participants who are employed (including the military) or enrolled in post-secondary education and/or advanced training/occupational skills training at program exit</p>	85%
<p>Employment (2nd Quarter after exit) The percentage of participants who are employed (including the military) or enrolled in post-secondary education and/or advanced training/occupational skills training during the 2nd quarter after the exit quarter.</p>	75%
<p>Employment (4th Quarter after exit) The percentage of participants who are employed (including the military) or enrolled in post-secondary education and/or advanced training/occupational skills training during the 4th quarter after the exit quarter.</p>	75%
<p>Median Earnings Median earnings of participants who are in unsubsidized employment during the 2nd quarter after program exit.</p>	\$3,500
<p>Number of Youth referrals or youth attending Partner4Work initiatives The number of youth referred to other WIOA program providers, PA CareerLink®, Partner4Work initiatives or service partners within CWDS throughout the program year should be equal or greater than 10% of current program enrollment. Not all referrals must be currently enrolled or active participants, but all need to be tracked through CWDS or reported to Partner4Work.</p>	10%

PERSONALLY IDENTIFIABLE INFORMATION

As part of grant activities, staff may have access to program participant or staff PII. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files, or other sources. Federal law and federal policies require that PII and other sensitive information be secured and protected at all times.

KEY TERMS

PERSONALLY IDENTIFIABLE INFORMATION: The Office of Management and Budget (OMB) defines “Personally Identifiable Information” (PII) as information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

The Department of Labor has defined two types of PII, “protected PII” and “non-sensitive PII.” The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the “risk of harm” that could result from the release of the PII.

- 1) **“Protected PII”** is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric

identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information, and computer passwords.

- 2) **“Non-sensitive PII”** is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. It is standalone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender, or race. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII.

To illustrate the connection between non-sensitive PII and protected PII, the disclosure of a name, business e-mail address, or business address most likely will not result in a high degree of harm to an

individual. However, a name linked to a social security number, a date of birth, and mother’s maiden name could result in identity theft. This demonstrates why protecting the information of our program participants is so important.

REQUIREMENTS

All parties must ensure the privacy of all [PII](#) obtained from [participants](#) and to protect such information from unauthorized disclosure. All parties must ensure that PII used during their grant has been obtained in conformity with applicable Federal and state laws and policies governing the confidentiality of information.

All PII transmitted via e-mail or stored on external drives must be encrypted. All PII stored onsite must be kept safe from unauthorized individuals at all times and must be managed with appropriate information technology (IT) services. Accessing, processing, and storing of PII data on personally owned equipment at off-site locations (e.g. employee’s home, and non-grantee managed IT services, e.g. Yahoo mail, Gmail, etc.) is strictly prohibited.

All parties who will have access to [sensitive](#)/confidential/proprietary/private data must be advised of the confidential nature of the information, the safeguards with which they must comply to protect the information, and that they may be liable to civil and criminal sanctions for improper disclosure.

Access to any PII obtained through the grant must be restricted to only those employees of the grant recipient who need it in their official capacity to perform duties in connection with the scope of work in the grant agreement.

All PII data must be processed in a manner that will protect the confidentiality of the records/documents and is designed to prevent unauthorized persons from retrieving such records by computer, remote terminal, or any other means.

Grantees must permit the [Employment and Training Administration \(ETA\)](#) and Partner4Work to make onsite inspections during regular business hours for the purpose of conducting audits and/or conducting other investigations to assure that the grantee is complying with the confidentiality requirements described above. In accordance with this responsibility, grantees must make records applicable to this agreement available to authorized persons for the purpose of inspection, review and/or audit.

Grantees must retain data received from ETA or Partner4Work only for the period of time required to use it for assessment and other purposes, or to satisfy applicable Federal and Partner4Work records retention requirements, if any. Thereafter, the grantee agrees that all data will be destroyed, including deletion of electronic data.

Additional Requirements:

1. Before collecting [PII](#) or [sensitive information](#) from [participants](#), have participants sign releases acknowledging the use of PII for grant purposes only.
2. Whenever possible, use unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to each individual record. Once the SSN is entered for performance tracking, the unique identifier would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN
3. Use appropriate methods for destroying sensitive PII in paper files (i.e. shredding) and securely deleting sensitive electronic PII.
4. Do not leave records containing PII open and unattended.
5. Store documents containing PII in locked cabinets when not in use.
6. Immediately report any breach or suspected breach of PII.

COMPLAINT & GRIEVANCE POLICY

The purpose of this section is to inform Partner4Work- funded program participants, staff, and partners of the procedures for filing a complaint or grievance alleging violations of programs and/or related policies and regulations.

BACKGROUND

Federal law mandates the development of procedures for filing complaints and grievances submitted by participants affected by, and who allege, violations of the requirements of program regulations or policies. The Partner4Work Complaint and Grievance Policy applies to program complaints and complaints regarding training and career services/activities only. For example, participants may file specific complaints pertaining to particular service provider staff and/or program services, refusal of entry into program activities, and denial of support service funds.

Partner4Work is the appropriate organization of contact when the complaint specifically concerns Partner4Work-funded programs. Each funded service provider must adhere to this policy. Service providers must retain documentation on any customer complaints that are received and resolved at the service providers' level, including the contents of the complaint and the resolution. This documentation must be made available to Partner4Work compliance monitors upon request.

POLICY

Program participants, staff, and/or other parties are encouraged to first seek an informal resolution at the service provider level regarding a complaint or grievance prior to filing a complaint with Partner4Work. Participants, staff, and/or other parties interested in filing a complaint with Partner4Work must follow the procedures below.

Step 1: Opportunity to File a Complaint

Individuals or entities seeking to file a written complaint to Partner4Work must complete the **Partner4Work Complaint and Grievance Form**, which is attached to this policy and available at partner4work.org. This form must be mailed or emailed to the following:

Partner4Work Compliance Manager
650 Smithfield St
Centre City Tower
Suite 2400 Pittsburgh, PA 15222

grievances@partner4work.org

All complaints or grievances must be filed within **180 calendar days** of the alleged violation to be reviewed and considered by Partner4Work.

Step 2: Opportunity for an Informal Resolution

The Partner4Work Compliance Manager will notify the complainant, acknowledging receipt of the complaint, within 5 calendar days of receiving the complaint.

The Partner4Work Compliance Manager will schedule a meeting with the complainant to occur within **15 calendar days** of receiving the complaint to attempt to reach an informal resolution between the parties. If an informal resolution can be reached, Partner4Work will request a written confirmation from the complainant verifying that they agree to the terms of the resolution. Partner4Work will notify all parties involved in writing that an informal resolution has been reached.

Step 3: Opportunity for a Hearing

If Partner4Work is unable to reach an informal resolution with the complainant, the complainant will be provided the opportunity for a hearing to take place no later than **45 calendar days** after the initial filing date of the complaint.

To ensure bias does not influence the outcome of a hearing, Partner4Work will perform an assessment of qualified staff. Upon conclusion, Partner4Work will appoint an impartial and qualified individual as the Hearing Officer to act as a mediator and attempt to resolve the issue(s) and render an independent decision. The Hearing Officer will send out a written notification of the hearing to all parties concerned, stating the date, time and place of the hearing and the issues to be heard.

All parties have the right to be accompanied by an attorney (at their own expense), or other duly authorized representative. All parties have the right to present testimony and to bring witnesses and records.

A written decision will be issued by the Hearing Officer to the complainant and all parties who attended the hearing within **60 calendar days** of the filing of the complaint. The decision will include: 1) a synopsis of the facts, 2) a statement of reasons for the decision, and 3) notification of records. All correspondence will be mailed certified with a return receipt requested.

Step 4: Commonwealth Grievance and Hearing Procedures

If Partner4Work does not provide a written decision within **60 calendar days** of receiving the complaint or either party involved receives a decision determined to be unsatisfactory, either party involved has the right to submit a local level appeal to the Commonwealth of Pennsylvania regarding the complaint in compliance with the Commonwealth of Pennsylvania's established procedures.

Information Requirements

Program providers must make commercially reasonable efforts to ensure participants, staff, partners, and other parties affected by the local workforce development system are informed of the content and requirements of this policy. This includes providing information on this policy during program enrollment and displaying the information in this policy in a public space.

Labor Standards Violations

If a collective bargaining agreement covering the parties to the grievance so provides, an individual alleging a labor standards violation may resolve the grievance through binding arbitration.

Important Disclaimers:

- This policy does not address the procedures for processing complaints alleging discrimination under WIOA Section 188 Nondiscrimination and Equal Opportunity Regulations, (29 CFR Part 38).
- This policy does not address the procedures for processing complaints for WIOA mandated partner programs outside of WIOA Title I Adult, Dislocated Worker, and Youth programs and the WIOA one-stop operator. Such complaints should be made via the internal processes of those partner organizations/agencies.
- Nothing in this policy precludes a complainant from pursuing a remedy authorized under another federal, state, or local law.

GLOSSARY OF TERMS

Hyperlinked words throughout this manual will bring the reader to the definition below, when engaged. To navigate back to the original section, simply engage **Alt+ Left Arrow**.

ATTENDING ANY SCHOOL: Youth receiving services from any one of the ‘public’ or ‘non-public’ institutions listed in the table below, as well as those being home-schooled or privately tutored, would be considered “attending school” for the purpose of WIOA Title I youth eligibility determination. A youth enrolled at a [post-secondary institution](#) would also be considered to be “attending school.”

Public Schools	Non-Public Schools
<ul style="list-style-type: none"> • School districts • Charter schools • Cyber charter schools • Area career and technical schools • Intermediate units 	<ul style="list-style-type: none"> • Private academic schools • Non-public schools (operated by a bona fide church or religious body) • Private academies and boarding schools • Private Residential Rehabilitative Institution
Post-Secondary Institutions (Public or Private)	
<ul style="list-style-type: none"> • Community college • 2-year college • College • University • Authorized degree granting institution (Pennsylvania Dept. of Education) 	

For the purpose of WIOA Title I-B youth eligibility determination, the Department of Labor considers individuals who are enrolled in adult basic education/GED preparation, skills training, or other remedial education programs including those offered through publicly and privately funded adult basic education programs, YouthBuild or Job Corps programs, to be “not attending school”.

BASIC SKILLS DEFICIENT: “Basic Skills Deficient” individuals are:

- A youth with English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- A youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

HOMELESS INDIVIDUAL: “Homeless Individual” means an individual who currently meets any of the following criteria:

- Lacks a fixed regular, and adequate nighttime residence; this includes a participant who:
 - Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;

- Is living in a motel, hotel, trailer park, or campground due to a lack of alternative adequate accommodations;
- Is living in an emergency or transitional shelter;
- Is abandoned in a hospital; or
- Is awaiting foster care placement;
- Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, such as a car, park, abandoned building, bus or train station, airport, or camping ground;
- Is a migratory child who, in the preceding 36 months, was required to move from one school district to another due to changes in the parent's or parent's spouse's seasonal employment in agriculture, dairy, or fishing work; or
- Is under 18 years of age and absents themselves from home or place of legal residence without the permission of his or her family (i.e. runaway youth)

(Note- A participant imprisoned or detained under an Act of Congress or State law does not meet the definition. Additionally, a participant who may be sleeping in a temporary accommodation while away from home should not, as a result of that alone, be recorded as homeless.)

INCENTIVES: Incentive payments are awarded to participants in recognition of a measurable achievement directly tied to training activities or work experiences. Incentive payments differ from stipends, as they must be awarded in response to a specific outcome achieved (e.g. credential attainment, job placement, placement in post-secondary education) rather than program participation/attendance.

INDIVIDUAL EMPLOYMENT PLAN: "Individual employment plan" (IEP) refers to an ongoing strategy jointly developed by the participant and the case manager that identifies the participant's employment goals, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goals.

INDUSTRY-RECOGNIZED CREDENTIAL: Credentials "industry-recognized," are defined by the U.S. Department of Labor as "either developed and offered by, or endorsed by a nationally recognized industry association or organization representing a sizable portion of the industry sector, or a credential that is sought or accepted by companies within the industry sector for purposes of hiring or recruitment which may include credentials from vendors of certain products." Utilize the [Postsecondary Credential Attainment Decision Tree](#) to assist in making determinations about whether individual credentials count toward WIOA performance indicator.

LOW INCOME INDIVIDUAL: The term "low-income individual" means an individual who meets one or more of the characteristics listed below:

- Recipient of Cash Public Assistance
- Family Income that does not exceed the higher of 70% of the Lower Living Standard Income Level (LLSIL) or the poverty line
- Receives, or was determined eligible to receive, Food Stamps in the last six months
- [Homeless](#)
- Publicly supported Foster Child
- Individual with a disability and own income is at or below 70% of the LLSIL or the poverty line
- Receives, or is eligible to receive, a free or reduced-price school lunch *
- An individual who resides in a high poverty area, defined as an area that has a poverty rate of at least 25% (set every 5 years, using American Community Survey (ACS) 5-year estimates)

* Programs must base low-income status on an individual student's eligibility to receive free or reduced-price lunch, whole school receipt of free or reduced-price lunch cannot be used to determine WIOA low-

income status for ISY. In schools where the whole school automatically receives free or reduced-price lunch, programs can check with their local school districts to determine whether individual students are eligible.

NEEDS RELATED PAYMENTS: “Needs related payments” provide financial assistance to enable individuals to participate in training activities.

NOT ATTENDING ANY SCHOOL: “Not attending any school” means a youth not receiving services from a public school, charter school, cyber charter school, career and technical school, sectarian school, or private school. Individuals who are enrolled in adult basic education/GED preparation, skills training, or other remedial education programs, including YouthBuild and Job Corps are not attending any school for the purposes of this policy.

Note: Locally, Partner4Work recognizes youth within the compulsory school age, who have not attended school for at least the most recent complete school year calendar quarter to be included in the definition of “not attending any school”.

OFFENDER: “Offender” means an adult or juvenile who:

- 1) Is or has been subject to any stage of the criminal justice process, and who may benefit from WIOA services; or
- 2) Requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

PARTICIPANT: For local adult, dislocated worker, and youth programs and Wagner-Peyser, a “participant” is a reportable individual who has received services other than self-service only or information-only services or activities after satisfying all applicable programmatic requirements for the provision of services.

PERSONALLY IDENTIFIABLE INFORMATION: Office of Management and Budget (OMB) defines “Personally Identifiable Information” (PII) as information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

The Department of Labor has defined two types of PII, “protected PII” and “non-sensitive PII.” The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the “risk of harm” that could result from the release of the PII.

POST-SECONDARY INSTITUTION: The State of Pennsylvania defines “Postsecondary institution” as community college, 2-year college, college, university, or other authorized degree granting institution approved by the Department of Education in accordance with Chapters 31 and 40 (relating to higher education general provisions; and institutional approval).

REQUIRES ADDITIONAL ASSISTANCE: “An individual who requires additional assistance to complete an educational program or to secure or hold employment” is defined by Partner4Work as a youth who meets one or more of the following criteria:

- Educational Needs:
 - Has an Individualized Education Program (IEP);
 - Currently one or more grade levels behind their peer group; or
 - Has earned some post-secondary education credits, but did not complete a post-secondary program and is not currently enrolled in post-secondary education.
- Employment Needs:
 - Has never been employed;

- Has been actively seeking employment for at least two months and remains unemployed or underemployed;
- Has been fired from at least one job within the previous 12 months; or
- Has had three or more jobs within the previous 12 months.
- Living Arrangements
 - Lives in a home in which only one or neither of their natural parents are present, due to incarceration, institutionalization, death, or other factors;
 - Currently resides in a government subsidized shelter or institution like a group home, rehabilitation facility or shelter for victims of domestic violence; or
 - Is an emancipated youth or latchkey youth.
- Historically Disenfranchised and Marginalized
 - Is an individual who has been historically underserved and marginalized as a result of race, national origin, sexual orientation, or gender identity;
 - Is a migrant Youth or an individual determined eligible for Deferred Action for Childhood Arrivals (DACA) Program; or
 - There is an underrepresentation of the participant's race, national origin, gender identity, or sexual orientation within their industry of choice.
- Additional Barriers to Education or Employment
 - Has a lack of or limited access to a personal vehicle and/or lives more than 1 mile from the closest or public transportation stop to attend education/training or employment;
 - Is currently receiving services from a human services agency...
 - Has been referred to, or is being treated by, an agency for a substance abuse related problem; or
 - Is a victim of abuse or resides in an abusive environment as documented by a school official or professional.

SELF-ATTESTATION: "Self-attestation" occurs when an individual states his or her status for a particular data element, such as "runaway youth", and then signs and dates a form acknowledging this status. Self-attestation is the process of: a) the individual identifying their status for permitted elements; and b) the individual signing and dating a form attesting to this self-identification.

SELF-CERTIFICATION: "Self-certification" is the individual's signed attestation that the information said individual submitted to demonstrate eligibility for a program under title I of WIOA is true and accurate. A signed **Self-Certification Form** is a type of self-certification.

STIPENDS: Stipends are predetermined, fixed payments that may be awarded to individuals for participation or attendance in training or work experience activities. Stipends differ from incentive payments as they are not tied to specific program outcomes (e.g. credential attainment) and instead are based on levels of program participation or attendance met. Stipends are not considered income for WIOA eligibility purposes, are not required to meet minimum wage requirements, are not dispersed as payroll, and income tax is not withheld.

Stipends are not a substitute for wages. Providers should refer to applicable legislation/policies, including the [Fair Labor Standards Act](#) (FLSA), to determine when a wage must be paid to individuals.

Resources: The USDOL - Wage and Hour Division: [Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act](#) can assist in determining whether an intern vs. employee relationship exists and if a wage must be paid. The USDOL has also provided this [FLSA compliance resource](#) to assist in determining whether a student/trainee vs. employee relationship exists.

SUPPORTIVE SERVICES: The term "Supportive Services" means services such as transportation, clothing and/or uniforms, equipment/tools, drug testing and/or TB testing, and reasonable accommodations for

individuals with disabilities, that are necessary to enable an individual to participate in activities authorized under WIOA.

WAGES: A wage is generally a payment for services rendered where an employer/employee relationship exists. This form of compensation is usually paid through a payroll system and is subject to the taxes applicable to the employer of record and participants. Paying a wage usually indicates that a program views the youth as an employee.

WORK EXPERIENCE: The term “Work Experience” means paid or unpaid employment and training provided by an employer or provider to a participant while engaged in productive work in a job that:

- 1) Is limited in duration.
- 2) Provides knowledge or skills essential to the full and adequate performance of the occupation.
- 3) Must include academic education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation.

In addition to the preceding list, “Paid Work Experience” must also adhere to Commonwealth of Pennsylvania minimum wage laws, and:

- 1) Provide reimbursement to the employer for a portion of the wage paid to the participant during the paid work experience period; or
- 2) Provide a portion or all of the wage paid directly to the participant through the Partner4Work contractor through which the youth is receiving services.

REFERENCES

ELIGIBILITY

- WIOA Section 3(2), (5), (15), (16), (36)
- WIOA Section 129(a)(1)(B) and (C)
- TEGL 21-16
- [TEN 22-19](#)
- [US Selective Service System FAQs](#)
- [WSG 03-2015](#)
- 20 CFR § 688.120
- [22 Pa. Code § 11.8](#)
- [TEGL 09-22](#)
- [TEGL 23-19 ch. 2](#)
- [TEGL 10-23](#)
- [Youth Eligibility Definitions -WSP](#)

WIOA YOUTH PROGRAM ELEMENTS

- TEGL 21-16

SUPPORTIVE SERVICES

- WIOA Section 3(59)
- 20 CFR §680.900

INCENTIVES

- WIOA Final Rule - 20 CFR 681.640
- U.S. Office of Management & Budget (OMB), Uniform Guidance, 2 CFR Part 200

- U.S. Department of Labor Wage and Hour Division, Wages and the Fair Labor Standards Act
- U.S. Department of Labor Wage and Hour Division, Youth Employment Compliance Assistance Toolkit
- U.S. Internal Revenue Service, Publication 525 (2019), Taxable and Nontaxable Income

STIPENDS

- WIOA [Final Rule](#) - 20 CFR 681.640
- U.S. Office of Management & Budget (OMB), [Uniform Guidance](#), 2 CFR Part 200
- U.S. Department of Labor Wage and Hour Division, [Wages and the Fair Labor Standards Act](#)
- U.S. Department of Labor Wage and Hour Division, [Youth Employment Compliance Assistance Toolkit](#)
- U.S. Internal Revenue Service, Publication 525 (2019), [Taxable and Nontaxable Income](#)

YOUTH WORK EXPERIENCE

- WIOA Section 129(c)(2)(C)
- WIOA Section 129(c)(4)

FOLLOW-UP SERVICES

- Training and Employment Guidance Letter (TEGL) 19-16 (March 1, 2017)
- Training and Employment Guidance Letter (TEGL) 21-16 (March 2, 2017)
- WIOA 20 CFR § 678.430
- WIOA 20 CFR § 681.580
- WIOA Sec 129(c)(2)(I)
- WIOA Sec 134(c)(2)(A)(xiii)

PERSONALLY IDENTIFIABLE INFORMATION

- TEGL 39-11

COMPLAINT & GRIEVANCE POLICY

- WIOA Final Rule 20 CFR § 683.600
- WIOA Section 181(c)

POLICY UPDATES

ELIGIBILITY

Date	Update
7/1/2024	<ul style="list-style-type: none"> • Revised eligibility section to align with federal and state guidance on the use of self-attestation/self-certification for WIOA Youth participants. • Revised definition table for “Attending School” to align with PA Department of Labor & Industry Youth Eligibility Definitions WSP.
02/25/2025	<ul style="list-style-type: none"> • Added subsection on secondary eligibility review requirements to align with PA Department of Labor & Industry Guidance Regarding Supervisory/Second Level Review of Eligibility Determinations • Revised local definition of “requires additional assistance” to align with TEN 21-24

SUPPORTIVE SERVICES

Date	Update
------	--------

12/15/2023	<ul style="list-style-type: none">• Revised language to clarify when a supportive service can be determined to be “necessary to enable participation in WIOA career services or training”.• Revised language to clarify how providers may determine that a supportive service is unavailable through resources outside of WIOA funding.• Removed references to the Near Completers Demonstration Grant.• Updated Policy Exceptions section to direct reviewers to the P4W Policy Exception Form.
7/1/2024	<ul style="list-style-type: none">• Revised policy to restructure supportive service gas card distribution determined by mileage traveled to and from work or training at the established federal rate.• Raised the weekly allowance of gas cards to \$75 from the \$60 cap for qualifying participants.• Added childcare category to list of supportive services to align with DOL Green Infrastructure.• Added section to establish disallowed supportive service categories.• Added section to establish service codes for undefined supportive service categories.

SELF-CERTIFICATION FORM

IDENTIFYING INFORMATION			
Applicant's Name:	_____	_____	_____
	Last	First	MI
Address:	_____		

Participant ID:	_____	Application Date:	_____

I HEREBY CERTIFY UNDER PENALTY OF LAW, THAT THE FOLLOWING INFORMATION IS TRUE:

I ATTEST THAT THE INFORMATION STATED ABOVE IS TRUE AND ACCURATE AND UNDERSTAND THAT THE ABOVE INFORMATION, IF MISREPRESENTED, OR INCOMPLETE, MAY BE GROUNDS FOR IMMEDIATE TERMINATION AND/OR PENALTIES SPECIFIED BY LAW.

APPLICANT'S SIGNATURE/DATE

APPLICANT'S PHONE NUMBER

APPLICANT'S ADDRESS

SIGNATURE OF PARENT OR GUARDIAN (as needed)

The above Self-Certification is being utilized for verification of the following eligibility criteria:

CERTIFICATION

I certify that the individual whose signature appears above provided the information recorded on this form.

Counselor's Signature/Date: _____

Reviewer's Signature/Date: _____

WIOA TELEPHONE VERIFICATION/DOCUMENT INSPECTION FORM

IDENTIFYING INFORMATION			
Applicant's Name _____	_____	_____	_____
	Last	First	MI
Participant ID _____	Date: _____		_____

WIOA ELIGIBILITY VERIFICATION BY TELEPHONE

NAME AND/OR NUMBER OF DOCUMENT _____

ELIGIBILITY ITEM(S) TO BE VERIFIED: _____
INFORMATION VERIFIED: _____
AGENCY PROVIDING VERIFICATION: _____
AGENT VERIFYING ELIGIBILITY ITEM: _____
DATE AND TIME OF VERIFICATION: _____
TELEPHONE NUMBER OF AGENCY PROVIDING VERIFICATION: _____

WIOA ELIGIBILITY VERIFICATION BY DOCUMENT INSPECTION

NAME AND/OR NUMBER OF DOCUMENT _____

ELIGIBILITY ITEM TO BE VERIFIED: _____
INFORMATION VERIFIED: _____
DOCUMENT TO BE INSPECTED: _____
ORIGINAL SOURCE OF DOCUMENT: _____
REASON FOR DOCUMENT INSPECTION: <input type="checkbox"/> REMOTE SITE ELIGIBILITY, NO COPIER AVAILABLE.
<input type="checkbox"/> ON SITE ELIGIBILITY, NO COPIER AVAILABLE.
<input type="checkbox"/> DOCUMENT CANNOT BE COPIED

I ATTEST THAT THE INFORMATION RECORDED BY ME ON THIS DOCUMENT WAS OBTAINED THROUGH TELEPHONE CONTACT OR DOCUMENT INSPECTION ON THE ABOVE DATE. AS INDICATED BY THE AGENT, ALL INFORMATION WAS OBTAINED FROM DATA PREVIOUSLY DETERMINED AND RECORDED IN THE APPLICANT'S RECORDS AT THE AGENCY PROVIDING THE ELIGIBILITY VERIFICATION.

OR

I ATTEST THAT THE DOCUMENT INSPECTION VERIFIED THE PRIMARY/SECONDARY ITEMS REQUIRED TO DETERMINE ELIGIBILITY FOR THE WIOA PROGRAM.

ELIGIBILITY SPECIALIST'S SIGNATURE _____

DATE _____

APPENDIX C



Complaint and Grievance Form

Full Name: _____

Date of Filing (MM/DD/YYYY): _____

Phone Number: _____

Email: _____

Provider Name: _____

Case Manager (if applicable): _____

Name of the person and/or organization you are filing a complaint/grievance against (if applicable):

Date of Incident, if available (MM/DD/YYYY): _____

The reason for my complaint or grievance is:

I have discussed this complaint or grievance with the following provider staff (please include name of staff person and date discussed):

I received the following response from provider staff:

PARTNER WORK

My complaint or grievance has not been resolved due to the following:

I believe the best course action to resolve my complaint or grievance would be the following:

SIGNATURE

Print Name: _____

Signature: _____

Date: _____

This form must be submitted by mail or email to the following:

Partner4Work Compliance Manager

650 Smithfield St

Centre City Tower, Suite 2400

Pittsburgh, PA 15222

grievances@partner4work.org

PARTNER WORK

WIOA ISY Eligibility: The Workforce Innovation and Opportunity Act (WIOA) defines in-school youth (ISY) eligibility. Use this checklist to determine which documents verify eligibility. Each applicant must document all the categories in box A and satisfy the reporting requirements for both box B **AND** box C. Documentation must be retained in participant file. Expired documents will not be accepted.

All WIOA in-school youth (ISY) must document each of the following for eligibility:

Eligibility point	Most common documentation
Social security number	Signed social security card; social security benefits document; employment records or paystubs (with number); DD-214; UC records
Citizenship or eligibility to work	Birth certificate; alien registration card; public assistance records; social security card (Work Eligible) with ID; U.S. passport
Age/date of birth	Birth certificate; government-issued ID or driver's license; public assistance records
Address	Government-issued ID; postmarked envelope; lease; public assistance records
Selective service registration (males 18+ only)	Internet verification of registration; DD-214; stamped post office receipt

Additionally, ISY must be attending school and must document one factor from box B **AND** one factor from box C :

Eligibility point	Most common documentation
Basic skills deficient	Standardized test score (TABE or CASAS); school records
Individual with a disability	Dropout letter; school record; self-OVR or agency letter; medical records; self-certification; telephone verification; 504 Plan
Pregnant or parenting	Child's birth certificate; doctor's note; telephone verification; self-certification
Offender	Court document; probation letter; halfway house residency, self-OVR or agency letter; medical records; certification
Individual with a disability	Dropout letter; school record; self-OVR or agency letter; medical records; self-certification; telephone verification; 504 Plan
English language learner	Self-certification
Homeless or runaway	Letter from shelter or individual providing shelter; self-certification; telephone verification
Foster child/aged out	Court documentation, self-certification; telephone verification

AND

Income eligibility	Most common documentation
Family income below 100% of the poverty line	Pay stubs; pension statement; UC documentation
Basic skills deficient	Public assistance records (COMPASS document)
Food Stamps; Cash assistance; SSI benefits	Public assistance records (COMPASS document)
English language learner	Public assistance records (COMPASS document)
Lives in a high poverty area	High poverty look up tool
Requires additional	High poverty look up tool
Receives or is eligible to receive free or reduced-price lunch	School letter
Individuals who have a documented disability or are a foster child/aged out of foster care are considered a family size of one.	

Food Stamps; Cash

Lives in a high poverty

WIOA OSY Eligibility Documentation: The Workforce Innovation and Opportunity Act (WIOA) defines out-of-school youth (OSY) eligibility. Use this checklist to determine which documents prove eligibility. Each applicant must document all the categories in box A and satisfy the reporting requirements of *either* box B **OR** box C. Documentation must be retained in participant file. Expired documents will not be accepted.
 All WIOA out-of-school youth (OSY) must document each of the following for eligibility:

PARTNER WORK

Eligibility point	Most common documentation
Social security number	Signed social security card; social security benefits document; employment records or paystubs (with number); DD-214; UC records
Citizenship or eligibility to work	Birth certificate; alien registration card; public assistance records; social security card (Work Eligible) with ID; U.S. passport
Age/date of birth	Birth certificate; government-issued ID or driver's license; public assistance records
Address	Government-issued ID; postmarked envelope; lease; public assistance records
Selective service registration (males 18+ only)	Internet verification of registration; DD-214; stamped post office receipt

Additionally, OSY may not be attending any school and must document *either* one factor from box B *OR* income and eligibility from box C:

Eligibility point	Most common documentation
High school	certification; telephone verification
Homeless or	Letter from shelter or individual providing shelter; self-certification; telephone verification
Foster child/aged out	Court documentation, self certification; telephone verification
disability	self-certification; telephone verification; 504 Plan
Pregnant or parenting	Child's birth certificate; doctor's note; telephone verification; self certification
Offender	Court document; probation letter; halfway house residency, self certification

OR

Eligibility point	Most common documentation
	Standardized test score (TABE or CASAS); school records
learner	Self-certification
assistance	School letter; court documents; self-certification; telephone verification
AND	
Income eligibility	Most common documentation
line	Pay stubs; pension statement; UC documentation
assistance; SSI benefits	Public assistance records (COMPASS document)
area	High poverty look up tool

PARTNER WORK

RIGHT TO KNOW POLICY

Partner4Work is committed to providing the public with timely access to public records to the fullest extent required by law. In compliance with The Commonwealth of Pennsylvania's Right to Know Law (RTKL), 65 P. S. §§ 67.101-67.3104, Partner4Work will accept RTKL requests submitted on a properly completed uniform [form published by the Office of Open Records \(PDF\)](#) on the PA Office of Open Record's website.

All RTKL requests must:

1. Be submitted in writing via one of the following methods:

Mail:

Open-Records Officer
650 Smithfield Street,
Suite 2400
Pittsburgh, PA 15222

Hand Delivery:

Open-Records Officer
650 Smithfield Street,
Suite 2400
Pittsburgh, PA 15222

Facsimile:

Open-Records Officer
(412) 552-7091

Email:

righttoknow@partner4work.org

2. State the name and address of the Requester;
3. Provide the address to which the Response should be addressed; and
4. Identify and describe the records sought in a specific and concise manner to enable Partner4Work to determine which records are being requested.

Partner4Work's Open-Records Officer will:

- Stamp the date of receipt on the written request.
- Compute the day on which the five business day response period under Section 901 will expire, make a notation of that date on the written request, and attempt to meet the request.
- Maintain an electronic or paper copy of a written request, including all documents submitted with the request until the request has been fulfilled.
- If the request is denied, the written request shall be maintained for 30 days.
- If an appeal is filed, keep the records until a final determination is issued or the appeal is deemed denied.
- Create a file and keep all of the following:
 - The original request
 - A copy of the response
 - A record of written communications with the requester

For purposes of this policy, Partner4Work's business hours are from 8:30 a.m. to 4:00 p.m. Monday-Friday.

Appeals

To challenge the denial, partial denial, or deemed denial of a request for Agency records, an appeal may be filed using the OOR appeal form, available at <http://www.openrecords.pa.gov/Appeals/AppealForm.cfm>.

Updates

Date	Policy Update
03/04/2025	Rephrased language to improve accessibility. Updated Standard Right-to-Know Law Request Form. Added section on appeals.



WIOA Complaint and Grievance Policy (DRAFT CHANGES)

Purpose

The purpose of this policy is to inform Workforce Innovation and Opportunity Act (WIOA) program participants, staff, and other parties of the procedures for filing a complaint or grievance alleging violations of the WIOA Title I Program and/or other WIOA-related policies and regulations. Complaints or grievances related to the services and activities of the WIOA one-stop operator must adhere to this policy as well.

Audience

WIOA Title I Adult, Dislocated Worker, and Youth participants and staff, the WIOA one-stop operator(s), WIOA one-stop partners, and other parties affected by the local workforce development system are the intended audience for this policy.

Background

The Workforce Innovation and Opportunity Act (WIOA) mandates the development of procedures for filing complaints and grievances submitted by participants and other interested persons affected by, and who allege, violations of the requirements of WIOA Title I and WIOA-related regulations or policies. The Partner4Work WIOA Complaint and Grievance Policy applies to WIOA Title I Adult, Dislocated Worker, and Youth program complaints and complaints regarding WIOA one-stop operator services/activities only. For example, WIOA-enrolled participants may file specific complaints pertaining to a particular service providers' service, activities, case management efforts and ability to provide appropriate WIOA services.

References

WIOA Final Rule 20 CFR § 683.600

WIOA Section 181(c)

Policy

Partner4Work is the appropriate organization of contact when the complaint specifically concerns WIOA Title I Adult, Dislocated Worker, and Youth programs or complaints regarding the WIOA one-stop operator. Each WIOA Title I Adult, Dislocated Worker, and Youth funded service provider, as well as the one-stop operator, must adhere to this policy. Service providers and the one-stop operator must retain documentation on any customer complaints that are received and resolved at the service providers' level, including the contents of the complaint and the resolution. This documentation must be made available to Partner4Work compliance monitors upon request.

This formal complaint process is specifically intended for **violations of WIOA** requirements or significant service delivery concerns for which a resolution is required or requested. For general customer feedback, providers must have other mechanisms in place to collect and respond to this information (e.g., customer feedback survey). Generally, individuals may submit complaints for any of the following reasons:

- **Denial of Services:** Being improperly denied access to WIOA-funded programs, training, or benefits.

PARTNER WORK

- **Program Eligibility Disputes:** Issues related to eligibility determinations for WIOA services.
- **Service Delivery Concerns:** Allegations of mismanagement, inadequate services, or failure to follow program procedures.
- **Other Violations of WIOA Law or Regulations** – Any action that conflicts with WIOA statutory or regulatory requirements.

When possible, participants, staff, and/or other parties are encouraged to resolve an issue informally at the service provider level prior to filing a formal complaint with Partner4Work. Individuals or organizations interested in filing a complaint with Partner4Work must follow the procedures below.

Step 1: Opportunity to File a Complaint

Individuals or entities seeking to file a written complaint to Partner4Work must complete the Partner4Work Complaint and Grievance Form, which is attached to this policy and available at partner4work.org. This form must be mailed or emailed to the following:

Partner4Work Compliance Manager
650 Smithfield St
Centre City Tower, Suite 2400
Pittsburgh, PA 15222
grievances@partner4work.org

All complaints or grievances must be filed within **180 calendar days** of the alleged violation to be reviewed and considered by Partner4Work.

Step 2: Opportunity for an Informal Resolution

The Partner4Work Compliance Manager will notify the complainant, acknowledging receipt of the complaint, within **5 calendar days** of receiving the complaint.

The Partner4Work Compliance Manager will schedule a meeting with the complainant to occur within **15 calendar days** of receiving the complaint to attempt to reach an informal resolution between the parties. If an informal resolution can be reached, Partner4Work will request a written confirmation from the complainant verifying that they agree to the terms of the resolution. Partner4Work will notify all parties involved in writing that an informal resolution has been reached.

Step 3: Opportunity for a Hearing

If Partner4Work is unable to reach an informal resolution with the complainant, the complainant will be provided the opportunity for a hearing to take place no later than **30 calendar days** after the initial filing date of the complaint.

To ensure bias does not influence the outcome of a hearing, Partner4Work will perform an assessment of qualified staff. Upon conclusion, Partner4Work will appoint an impartial and qualified individual as the Hearing Officer to act as a mediator and attempt to resolve the issue(s) and render an independent decision. The Hearing Officer will

PARTNER WORK

send out a written notification of the hearing to all parties concerned, stating the date, time and place of the hearing and the issues to be heard.

All parties have the right to be accompanied by an attorney (at their own expense), or other duly authorized representative. All parties have the right to present testimony and to bring witnesses and records.

A written decision will be issued by the Hearing Officer to the complainant and all parties who attended the hearing within **60 calendar days** of the filing of the complaint. The decision will include: 1) a synopsis of the facts, 2) a statement of reasons for the decision, and 3) notification of records. All correspondence will be mailed certified with a return receipt requested.

Step 4: Commonwealth Grievance and Hearing Procedures

If Partner4Work does not provide a written decision within **60 calendar days** of receiving the complaint or either party involved receives a decision determined to be unsatisfactory, either party involved has the right to submit a local level appeal to the Commonwealth of Pennsylvania regarding the complaint in compliance with the Commonwealth of Pennsylvania's established procedures.

Information Requirements

WIOA Title I Adult, Dislocated Worker, and Youth providers and the one-stop operator must make commercially reasonable efforts to ensure participants, staff, WIOA one-stop partners, and other parties affected by the local workforce development system are informed of the content and requirements of this policy. This includes providing information on this policy during program enrollment and displaying the information in this policy at the PA CareerLink® center(s).

Labor Standards Violations

If a collective bargaining agreement covering the parties to the grievance so provides, an individual alleging a labor standards violation may resolve the grievance through binding arbitration.

Important Disclaimers:

- This policy does **not** address the procedures for processing complaints alleging discrimination under WIOA Section 188 Nondiscrimination and Equal Opportunity Regulations, (29 CFR Part 38).
- This policy does not address the procedures for processing complaints for WIOA mandated partner programs outside of WIOA Title I Adult, Dislocated Worker, and Youth programs and the WIOA one-stop operator. Such complaints should be made via the internal processes of those partner organizations/agencies.
- Nothing in this policy precludes a complainant from pursuing a remedy authorized under another federal, state, or local law.

Effective Date: TBD

PARTNER WORK

Complaint and Grievance Form

Full Name: _____

Date of Filing (MM/DD/YYYY): _____

Phone Number: _____

Email: _____

Provider Name: _____

Case Manager (if applicable): _____

Name of the person and/or organization you are filing a complaint/grievance against (if applicable):

Date of Incident, if available (MM/DD/YYYY): _____

The reason for my complaint or grievance is:

I have discussed this complaint or grievance with the following provider staff (please include name of staff person and date discussed):

I received the following response from provider staff:

PARTNER WORK

My complaint or grievance has not been resolved due to the following:

I believe the best course action to resolve my complaint or grievance would be the following:

SIGNATURE

Print Name: _____

Signature: _____

Date: _____

This form must be submitted by mail or email to the following:

Partner4Work Compliance Manager
650 Smithfield St
Centre City Tower, Suite 2400
Pittsburgh, PA 15222
grievances@partner4work.org