

## **POLICY**

### **FIREWALL & INTERNAL CONTROL POLICY for MULTI-ROLE OSO PROVIDERS AT ONE-STOP CENTERS**

#### **Purpose**

To establish guidelines and procedures that prevent conflicts of interest and promote compliance with the Workforce Innovation and Opportunity Act (WIOA) §§ 679.430, 678.620 and Training and Employment Guidance Letter (TEGL) No. 15-16 (January 17, 2017) through the clarification and separation of duties and responsibilities of an entity under contract in the Allegheny County Pennsylvania area serving as the One-Stop Operator (OSO) while simultaneously performing another role within the one-stop system.

#### **Citation(s)**

20 CFR §678.620

20 CFR §678.625

20 CFR § 679.430

Training and Employment Guidance Letter (TEGL) No. 15-16 (January 17, 2017)

#### **Scope**

This policy applies to all employees, contractors, and partners of the Local Workforce Development Board (LWDB) and the Multi-Role OSO Provider at PA CareerLink® (PA CL) One-Stop centers.

#### **Definitions**

- **One-Stop Operator (OSO)**: The entity responsible for coordinating the service delivery of required one-stop partners and service providers within a designated local workforce development area. The OSO ensures the integration of services, operational efficiency, and compliance with Workforce Innovation and Opportunity Act (WIOA) regulations, while maintaining clear accountability and separation of duties when also serving in other roles within the one-stop system. The OSO is accountable to the LWDB for adhering to all relevant policies, procedures, and performance standards established to meet the needs of job seekers and employers effectively.
- **Service Provider**: The entity delivering direct workforce development services to customers at PA CareerLink® centers.
- **Multi-Role OSO Provider**: An entity currently under contract in the Allegheny County/City of Pittsburgh workforce development areas simultaneously serving as the

One-Stop Operator (OSO) and a different role within the one-stop delivery system (e.g., local service provider).

- Local Workforce Development Board (LWDB): The entity established under the Workforce Innovation and Opportunity Act (WIOA) responsible for overseeing and coordinating workforce development activities, including planning and monitoring the delivery of services to improve employment opportunities and meet local employer needs within a designated area. The LWDB ensures that the Multi-Role OSO Provider maintains clear distinctions and separation of duties between its OSO and service provider roles.
- Firewall: Measures designed to prevent conflicts of interest and ensure the separation of roles and responsibilities.

### **General Principles**

- Independence: The Multi-Role OSO Provider is accountable for adhering to all WIOA regulations and this firewall policy. Clear distinctions must be established and maintained by the OSO in accordance with this policy to clarify distinctions between the roles and responsibilities of the OSO and Service Provider.
- Transparency: All Multi-Role OSO Provider operations and decisions must be conducted transparently with clear documentation and reporting to the LWDB upon request.
- Accountability: The Multi-Role OSO Provider is accountable for strict adherence to the terms and conditions of this Agreement, including but not limited to the development and implementation of the internal control mechanisms detailed herein to ensure accountability and compliance with this Agreement and controlling guidance.

### **Triggering Event**

This policy becomes applicable when an entity serving as the OSO is contracted to undertake an additional role within the workforce system. Where an OSO Provider assumes an additional role *after* executing an agreement for OSO Services, this subsequent engagement triggers this Policy's application. The OSO is responsible for informing necessary parties upon becoming aware of the triggering event.

### **Procurement**

- Competitive Procurement of the OSO: The OSO will be selected through a competitive procurement process in accordance with the requirements of WIOA and its respective regulations.
- Procurement Separation: The competitive procurement of the OSO will be conducted separately from the procurement of any other entity or role within the one-stop delivery system.
- OSO Restrictions: The OSO will not participate in the selection or termination of contracted career service providers and/or youth providers.

### **Structural Separation**

- **OSO Role and Responsibilities:** The OSO role and responsibilities will be defined through the One-Stop Partner Memorandum of Understanding (MOU) and agreed upon by all WIOA-required partners, additional partners, and chief elected officials for the local workforce development area.
- **Organizational Structure:** The OSO and Service Provider functions must be distinctly separated within the Multi-Role OSO Provider's organizational structure, including separate management teams and reporting lines.
- **Physical Separation:** Where feasible, the OSO and Service Provider operations should be physically separated within PA CareerLink® centers.
- **Personnel Separation:** Staff members of a Multi-Role OSO Provider who are assigned to OSO functions must not concurrently perform Service Provider duties. Separate teams should be designated for each role.

### **Operational Guidelines**

- **Decision-Making:** Decisions regarding service delivery, participant eligibility, and funding allocations must be made independently by designated teams for OSO and Service Provider roles.
- **Communication Protocols:** Formal communication protocols must be established to ensure appropriate information sharing between the OSO and Service Provider roles without compromising their independence. These communication protocols must be established within 30 calendar days following receipt of this guidance and/or within 30 days of becoming a Multi-Role OSO Provider.
- **Data Access and Security:** Access to sensitive data must be restricted and monitored to ensure it is used appropriately and only by authorized personnel.

### **Conflict of Interest**

- **Written Agreement:** Any organization or entity selected to serve as the OSO and a different role within the one-stop delivery system must develop and enter into an agreement with the LWDB and Chief Elected Official(s) within six (6) months of becoming a Multi-Role OSO Provider to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA and corresponding regulations, the Uniform Guidance, and applicable conflict of interest policies.
- **Disclosure Requirements:** All employees must disclose any potential conflicts of interest arising from their dual roles within the Multi-Role OSO Provider. The Multi-Role OSO Provider must maintain records of all disclosures and actions taken to address potential conflicts.
- **Conflict Resolution:** A formal conflict resolution process must be in place to address and resolve any conflicts of interest that may arise. The Multi-Role OSO Provider must

document all conflict resolution processes and outcomes to ensure transparency and accountability.

- Record Keeping: All disclosures of potential conflicts of interest and the outcomes of conflict resolution processes must be documented and maintained in a secure and accessible manner to ensure proper oversight and transparency.

### **Training**

Partner4Work staff will provide training to the Operator on the firewall policy and requirements at least on an annual basis. This training will occur during the first quarter of each new program year (beginning July 1) or within 90 days of the start date of a new OSO contract.

### **Review and Amendments**

- Policy Review: This policy must be reviewed annually by Partner4Work with the Multi-Role OSO Provider and updated as necessary to ensure continued compliance with WIOA regulations and any changes in operations or organizational structure.
- Annual Monitoring: As part of Partner4Work's annual monitoring process, aspects of this firewall policy will be incorporated to ensure ongoing compliance and to identify areas for improvement. This monitoring will include but may not be limited to a review of organizational structures, decision-making processes, communication protocols, data access controls, and records of conflict of interest disclosures and resolutions.

**Effective Date:** July 1, 2024

**Last Reviewed:** June 18, 2024

## **Policy**

### **Lease Threshold Accounting**

#### **Policy Purpose**

Generally accepted accounting principles require lessees and lessors to recognize the effect of a leasing contract on the balance sheet (ASU 842). This policy provides guidance on the threshold for recording right-of-use assets and liabilities on the balance sheet.

#### **Policy Statement**

This policy governs the threshold amount for lease agreements and agreements that contain lease components entered by Partner4Work (the Organization) as a lessee. The lessee is the party granted use rights of an asset as part of an agreement.

There are two lease classifications for a lessee: finance and operating.

A lease exists when a contract or part of a contract conveys the right to control the use of an identified asset (property, plant, or equipment—PP&E) for a period in exchange for consideration (i.e., payment). The lessee is determined to have control of the use of an asset if it can determine how the asset is used and has the right to all the economic benefits arising from the asset.

The Organization is electing to use a risk-free rate (i.e., U.S. Treasury rate) as the discount rate for all leases.

The Organization is electing not to recognize short-term leases on the statement of financial position. A short-term lease is defined as a lease with a lease term of 12 months or less and does not include a purchase option that the lessee is reasonably sure to exercise.

#### **Threshold Cap**

The threshold for the right of use of leased assets is set at \$175,000. Any lease agreement exceeding this threshold will be added to the Balance Sheet as the law requires. If multiple leases are entered into during the fiscal year and the cumulative value exceeds the \$175,000 threshold, we will reevaluate the need to add to the balance sheet. All leases entered into by Partner4Work require approval from two (2) of the following: Chief Executive Officer, Chief Financial Officer, and Chief Operating Officer.

#### **Audience**

All Partner4Work Staff are responsible for implementing and meeting the requirements of this policy.

#### **Citations**

This policy is under ASU842

**Effective Date**

This policy is effective 7/1/2023 upon approval and shall remain in effect until further notice.

# PARTNER WORK

## REENTRY SUPPORTIVE SERVICES POLICY

### Purpose

Partner4Work, through a network of providers, ensures the availability of appropriate and necessary supportive services to assist reentry program participants with reintegration in the community. The purpose of this policy is to articulate how supportive service dollars are permitted to be provided to participants of Partner4Work- funded reentry programs. This policy is in full compliance with the State and Federal regulations governing these programs.

### Affected Parties

This policy applies to all Pittsburgh/Allegheny County participants of the following programs:

- Pittsburgh Reentry Career Services (PRCS)
- Young Adult Reentry Project (YARP)

Partner4Work and reentry program provider staff in Allegheny County and the City of Pittsburgh are responsible for implementing this policy.

### References

- [DOJ Grants Financial Guide](#)
- [Youth Reentry Notice of Grant Availability \(NGA\)](#)

### Definition of Key Terms

“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 employment and training activities.

### Eligibility Requirements

The following are supportive service eligibility requirements for PRCS participants:

- Participant must be a PRCS-enrolled
- Participant must be participating in post-release services

The following are supportive service eligibility requirements for YARP participants:

- Participant must be YARP- enrolled

### Policy

Partner4Work reentry programs ensure access to social determinants of health and transitional supportive services. Following screening and goal planning, case managers will meet with each participant to assess the need for supportive services. Supportive service awards should be based on individual participant needs and plan development. Information on the need and supportive service provided should be properly documented in each

participant case file. P4W funds must be used in accordance with State and Federal guidance and regulations applicable to the funding source. Approved reentry service plans include:

- Individual Employment Plan (IEP)
- Council of Thought and Action (COTA) plan

Reentry funding should supplement, not supplant, existing public and private resources. Program staff are responsible for coordinating services and providing referrals to other state and local agencies offering supportive services prior to expending reentry funds.

Partner4Work Reentry Supportive Services Availability:

Partner4Work will provide funding for the below list of supportive services for reentry participants. Supportive services address many types of barriers that individuals face upon reentry, therefore, this list is not exhaustive. Providers seeking to include other categories of supportive services not listed in this policy may submit a proposal to their Partner4Work program contact for consideration.

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:

<b>Weekly Travel</b>	5-30 miles	31-75 miles	76+ miles
<b>Gas Card Amount</b>	\$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 ½ 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. **Documentation:** Supportive service funds may be used for attaining documentation necessary to benefit from employment and education opportunities and financial aid services (e.g., birth certificate, driver’s license, Social Security card, etc.);
3. **Non-employer paid licensing/certification or educational testing fees:** A participant may receive funding for a maximum of two (2) instances of the same license/certification or test utilizing reentry supportive services dollars. 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.
4. **Drug Testing and/or TB Testing:** A reentry participant may have drug tests and/or TB tests paid for through supportive services dollars.



5. **Criminal Background Checks and/or Clearances:** A reentry participant may have criminal background checks and/or clearances necessary to begin employment and/or education paid through supportive services dollars. This includes 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.
6. **Childcare-** Participants may receive support for child care expenses when necessary for participation in services. To qualify, participants must first apply for support through the Pennsylvania Department of Humans Services (DHS) subsidized child care program. PRCS and YARP funds may be used to cover the participant's share of the child care cost when participating in this subsidized child care program, including child care costs incurred if placed on the waitlist for the program. PRCS and YARP funding may also be used to provide support for child care expenses for participants who meet income eligibility criteria for the PA DHS subsidized child care program, but do not qualify based on other criteria. Participants may receive a maximum per child rate of \$6.25/hour and \$50.00/day. Participants will only receive support for childcare expenses during hours required for participation in PRCS and YARP services.
7. **Clothing and/or uniform-** A reentry 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.
8. **Equipment/tools:** A reentry 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.
9. **Unions and Registered Apprenticeships Fees:** A reentry 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:** Supportive services dollars may only be used as the funding of last resort for these accommodations.
11. **Personal Computer Purchase Support:**
  - a. Personal computer purchase support may not exceed \$500.00 per participant.
  - b. Once purchased the device belongs to the participant and they are responsible for all costs associated with maintenance.
  - c. Personal computer purchase support may only be considered if the participant has no other existing device available. The participant must sign a self-attestation form and the form must be available to Partner4Work upon request.
  - d. PA CareerLink will be responsible for purchasing personal computers for participants and appropriately accounting for these purchases in accordance with the Federal Uniform Guidance and all other applicable requirements.
  - e. Failure to adhere to these internal controls will result in disallowed costs.
12. **Personal Internet Service Support:** Reentry participants may receive assistance for internet services. To qualify, participants must first apply for community-based programs such as those under [PA Department of Community & Economic Development](#) and/or [Pennsylvania 211](#).
  - a. Personal internet service support may not exceed \$30.00 per month.
  - b. Personal internet service support may only be provided during the months the customer is enrolled and actively engaged in the program.
  - c. Personal internet service support reimbursement may not exceed 12 months.
  - d. Personal internet service support may only be considered if the participant has no other existing internet service available. The participant must sign a self-attestation form and the form must be available to the Partner4Work upon request.
  - e. Failure to adhere to these internal controls will result in disallowed costs.

**Policy Exceptions:**

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

**Effective Date:** July 1, 2024

**Policy Updates:**

Date	Policy Update
7/1/2024	<ul style="list-style-type: none"><li data-bbox="467 779 1437 877">● Revised the policy to restructure supportive service gas card distribution determined by mileage traveled to and from work or training at the established federal rate.</li><li data-bbox="467 884 1437 940">● Raised the weekly allowance of gas cards to \$75 from the \$60 cap for qualifying participants.</li></ul>

# PARTNER WORK

## ADULT TANF TRAINING VOUCHER POLICY

### Purpose

Partner4Work has adopted the following policy with respect to the use of training vouchers for Temporary Assistance for Needy Families (TANF) and Extended TANF (ETANF) participants in the Allegheny County Employment Retention and Advancement Network (EARN) and Work Ready programs.

### Affected Parties

This policy applies to all TANF participants in Allegheny County EARN and Work Ready programs. Allegheny County EARN and Work Ready staff are responsible for implementing this policy.

### Definitions of Key Terms

A TANF training voucher is a funding mechanism through which eligible individuals can get financial resources to support participation in quality vocational training expected to result in employment in high demand occupations.

### Eligibility Requirements

Training voucher funding is not guaranteed to any participant and is contingent on funding availability. EARN and Work Ready participants may qualify for a TANF training voucher if it is determined by contracted provider staff that they meet the following criteria:

- A participant in the Allegheny County EARN/Work Ready program, in good standing with program requirements and expectations.
- After an interview, evaluation or assessment, and career planning, staff have determined that the participant:
  - Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency<sup>1</sup> 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.
- An individual has the time available for participation in the training program according to allowable Allegheny County EARN/Work Ready program activities.

### Additional Eligibility and Suitability Information

- Students are required to complete financial aid forms if the program qualifies. Pell, PHEAA, and related grants can be utilized concurrently with TANF training vouchers, but TANF funding must be used as a last resort, when other funding is not available.

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<sup>1</sup> See Partner4Work Self-Sufficiency Policy

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- If the training program selected is greater than \$5,000, the student must indicate how the remaining costs of training will be funded.
- Contracted EARN/Work Ready staff must determine students eligible and suitable for training. Determining training suitability involves establishing an individual's level of need and qualification related to participating in their desired training program, among other factors, including but not limited to considering alternative career approaches, likelihood of gainful employment upon completion, and alignment with an individual's established career pathway.
- Training vouchers will not be issued for any student who does not have a high school diploma, GED, or equivalent.

## Policy

### Adult TANF Training Voucher Cap

Participants may receive a maximum of \$5,000 in training voucher funding during their participation in an EARN/Work Ready program, which will be paid directly to the organization providing the training to the participant.

Training providers will receive 50% of the total training voucher funding amount when a participant successfully enrolls into and begins an approved training program. Training providers will receive the remaining 50% of the total training voucher 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.

Partner4Work may establish an alternate payment structure under the following circumstances:

- The 50/50 payment structure is prohibitive, and would limit access to the training program.
- An alternate payment structure would enable participation in high quality, effective programming.

### Maximum Duration of Training Voucher

Training vouchers may be valid for up to two years.

### Number of Training Vouchers per Participant

Participants are limited to receiving only one training voucher during their time in EARN/Work Ready programming.

### Expenses a Training Voucher May Cover

Training vouchers may support tuition and other training costs that are not covered under Special Allowances (SPAL), including fees, books, and school supplies (if the books and supplies are required by the school). SPALs that could be used to cover related training costs must be pursued before being considered for funding through a training voucher.

### Trainings covered by Training Vouchers

Training vouchers will be awarded to quality training programs that prepare individuals to succeed in the workforce with strong connections to employment opportunities. Priority for training vouchers will be given to programs with the following characteristics:

# PARTNER WORK

- Approved for credential recognition by the PA Department of Human Services,
- Provides an industry-recognized credential,
- Included on Pennsylvania’s Eligible Training Provider List (ETPL),
- Included on Pennsylvania’s High Priority Occupation (HPO) List.

Registered Apprenticeships qualify for training vouchers; participants are encouraged to consider an Apprenticeship as a viable career pathway.

Before awarding a training voucher, EARN/Work Ready staff should engage in employer conversations to confirm there are job placements available after a participant completes training.

Training vouchers are designed to get people back into the labor force quickly. An occupation requiring a bachelor’s degree or higher education is not eligible to receive funding.

Training vouchers should align with key industry sectors identified by Partner4Work. Partner4Work and contracted EARN/Work Ready Providers will work to align training funds across programs to ensure a broad portfolio of strong training options.

### Partner4Work Approval

Contracted EARN/Work Ready providers must receive approval from Partner4Work on each training voucher before proceeding.

### **Policy Exceptions**

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

**Effective Date:** July 1, 2024

### **Policy Updates:**

Date	Policy Update
7/1/2024	<ul style="list-style-type: none"><li>● Added language describing the payment structure for Adult TANF training voucher funding, including 50% payment at enrollment/start of an approved training program and 50% payment upon successful program completion.</li><li>● Added a caveat to the language referenced above, citing the limited circumstances under which a provider may set up alternate mechanisms for funding.</li></ul>

# TANF YOUTH DEVELOPMENT PROGRAM POLICY GUIDE



EFFECTIVE DATE: JULY 1, 2024

PARTNER4WORK PITTSBURGH, PA

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## OVERVIEW

### QUALIFICATION PROCESS

To be able to utilize TANF YDP funds, all TANF YDP participants must be qualified by The Department of Human Services (DHS). DHS has established a Preliminary Screening Tool in the Commonwealth Workforce Development System (CWDS) 2.0 that will be used to qualify applicants for TANF YDP services. TANF YDP providers must utilize the Preliminary Screening Tool to ensure that personally identifiable information (PII) is not transmitted through unsecured methods.

TANF YDP providers must ensure that the applicant meets the age eligibility requirements of the TANF YDP prior to utilizing this tool. To be eligible for TANF YDP funded services, the applicant must be between the ages of 12 (or have completed the 5th grade) and 24 years at the time of application. If the applicant does not meet the age requirement, the applicant is INELIGIBLE for services using TANF Youth Development Funds (TANF YDF). The provider will not proceed with the Preliminary Screening Function but will review the applicant’s eligibility for services through other funding sources.

Access the TANF YDP Preliminary Screening Instructions [here](#).

### TANF YOUTH ELIGIBILITY

This section ensures every participant who receives TANF 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.

Youth must meet basic eligibility requirements to participate in the TANF Youth program. Both In-School Youth (ISY) and Out-of-School Youth (OSY) must meet the following requirements:

- Be between the ages of 12 (or having completed the 5th grade) and 24 years;
- Have their identity verified through SSN;
- Be a resident of Allegheny County and/or the City of Pittsburgh;
- Be a U.S. citizen or a TANF-eligible non-citizen;
- Have a personal monthly gross earned income that does not exceed [235% of the Federal Poverty Income Guidelines \(FPIG\)](#);
  - **Note:** The youth’s sole monthly gross earned income shall establish their qualification unless the youth is (a) legally married or (b) has children and is residing in the same home as the child(ren)’s other parent. In those instances, the youth and their spouse or the other parent of the child(ren)’s gross earned income will apply, and the family’s household size will include the youth, spouse or other parent of common child(ren) residing with them, and the child(ren). Proof of income must be dated within the last 30 days. Personal monthly gross income verification is required only at the time of enrollment.
- Individuals who have a personal monthly gross earned income that exceeds 235% of the FPIG may meet income eligibility requirements IF they are a resident of a designated high poverty area and have any one of the documented additional barriers listed below. This method may only be used for individuals earning above 235% of the FPIG.
  - The most current version of the Pennsylvania High Poverty Area Verification tool, distributed by L&I’s Bureau of Workforce Partnership and Operations (BWPO), will be used to determine if a youth resides in a high poverty area.

#### ADDITIONAL ELIGIBILITY REQUIREMENTS FOR IN-SCHOOL YOUTH (ISY)

- [Basic skills deficient](#).
- English language learner.
- An [offender](#), or a child of an incarcerated parent(s).
- [Homeless](#), runaway, in foster care or aged out of the foster care system.
- Pregnant or parenting.
- An individual with a disability.
- A person who [requires additional assistance](#) to enter or complete an educational program or to secure and hold employment.
- Identified as at risk of dropping out of school.
- Are a migrant.

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

- A school dropout.
- Within age of compulsory attendance but has [not attended](#) for at least the most recent complete school year calendar quarter.

- Holds a secondary school diploma or recognized equivalent and is [basic skills deficient](#) or an English language learner.
- Subject to the juvenile or adult justice system, or a child of an incarcerated parent(s).
- [Homeless](#), runaway, in foster care or aged out of the foster care system, eligible for assistance under Section 477, Social Security Act, or in out-of-home placement.
- Pregnant or parenting.
- An individual with a disability.
- [Requires additional assistance](#) to enter or complete an educational program or to secure and hold employment.
- Are a migrant.

#### ADDITIONAL TANF ELIGIBILITY INFORMATION:

- TANF in-school youth must be attending an accredited secondary school. TANF out-of-school youth must not be currently enrolled in secondary school.
- A person is not eligible for TANF if they are an inmate or resident of a public penal, reform, correctional or mental institution, or any other public institution or temporarily hospitalized in a public mental institution. A court-involved youth may participate in the TANF Youth programming so long as they reside in:
  - A maternity home; or
  - A drug and alcohol rehabilitation center; or
  - A detoxification unit; or
  - Community residential facilities under contract to, or operated by, state, county, or municipal authorities, such as Community Correction Centers (CCCs).

TANF YDF providers should refer to the Pennsylvania TANF Youth Development Program Summer and Year-Round Policy and Procedures Manual ([July 1, 2023 – June 30, 2024](#)) for additional information on how to determine TANF eligibility if institutionalized.

- For all group activities, TANF Youth providers must collect the required documentation to verify that each group activity participant is qualified to receive TANF Youth services before a given activity. For verified individuals qualified as TANF participants, participation begins on the date the youth applied and will remain qualified for 12 months. During this time, the youth may participate in multiple services with different local providers.
- **Note:** If a TANF Youth provider chooses to serve individuals before establishing them as a qualified participant, the provider accepts the responsibility for funding services to those determined to be non- TANF eligible with an alternative funding source.

Partner4Work reserves the right to set additional eligibility requirements on an individual contractual basis. Subrecipients should refer to their contract with Partner4Work for the full scope of eligibility requirements for their program.

## FEDERAL POVERTY INCOME GUIDELINES 2024

Household Size	Federal Poverty Guideline (FPIG)	235% of FPIG	235% of FPIG (Monthly)	235% of FPIG (Hourly Wage)
1	\$15,060	\$35,391	\$2,949	\$17.03
2	\$20,440	\$48,034	\$4,003	\$23.10

3	\$25,820	\$60,677	\$5,056	\$29.18
4	\$31,200	\$73,320	\$6,110	\$35.25
5	\$36,580	\$85,963	\$7,164	\$41.33
6	\$41,960	\$98,606	\$8,217	\$47.40
7	\$47,340	\$111,249	\$9,271	\$53.48
8	\$52,720	\$123,892	\$10,324	\$59.58

## SELF CERTIFICATION

TANF YDF participants may [self-certify](#) if they do not have earned income. The WIOA Self-Certification or Statement of Family Size/Income Form may be used for this purpose. For individuals with earned income, self-certification must only be used as a last resort for verifying income and attempts to collect verification must be documented in client case notes. Where an additional documented barrier is required for TANF YDF eligibility, self-certification may be used when other forms of verification are unavailable.

TANF YDF providers may also use telephone-verification, especially in consideration of individuals with barriers. When applicable, eligibility criteria may be verified by telephone contacts with recognized governmental or social services agencies, or by document inspections. Information obtained through this method should be documented on the attached Telephone/Document Inspection Verification Form.

## PRIORITY OF SERVICES

Eligible youth with any of the following barriers to success are expected to be prioritized for services and activities:

1. School dropout or identified as at risk of dropping out of school.
2. Within the age of compulsory attendance but has [not attended](#) for at least the most recent complete school year calendar quarter.
3. [Basic skills deficient](#).
4. An English language learner.
5. Have a disability.
6. Court-involved or at risk of involvement.
7. Child(ren) of an incarcerated parent(s).
8. In foster care or aging out of foster care.
9. [Homeless](#) or a runaway.
10. Pregnant or parenting.
11. A migrant.
12. In [need of additional assistance](#) to enter or complete an educational program or to secure and hold employment.

## ONGOING ENROLLMENT

TANF YDP [participants](#) must complete a new application after 12-months of participation if the youth wish to continue their engagement in TANF YDP activities. A youth's 12-month qualification period begins on the date the initial TANF YDP application was completed and subsequently qualified.

- Example: Youth completed an application on October 8, 2022 and was found eligible through the Preliminary Screening Tool on October 10, 2022. The participant received year-round

services from one local program in October 2022 and summer services in July 2023 from another local program. The participant would be required to complete a new application and be re-qualified in October of 2023.

The qualification process must be used as indicated to validate a participant on the 12-month cycle. All verifications previously collected must be maintained in the youth's data file. Information not previously collected in the youth's initial enrollment would require verification at the time of re-enrollment and stored in the data file as appropriate.

## TANF YOUTH SERVICES

As noted in the overview above, TANF YDPs must incorporate all 14 Program Elements described within the Workforce Innovation and Opportunity Act of 2014 (WIOA) to align with the TANF Statewide Plan. However, not all participants are required to receive all 14 WIOA Youth Program Elements; program elements that a participant will receive will be based on individual needs as determined by the participant and the TANF YDP case manager. Furthermore, it is not expected that all providers would deliver all 14 elements, but all elements should be available to youth through a combination of referral partnerships.

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 <a href="#">Act</a> or applicable <a href="#">State</a> law.
4. Occupational skills training, as appropriate; particularly training that leads to <a href="#">industry recognized credentials</a> aligned with in-demand industry sectors;	Occupational skills training is defined as an organized program of study that provides 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:  (1) Be outcome-oriented and focused on an occupational goal specified in the individual service strategy;

	<p>(2) Be of sufficient duration to impart the skills needed to meet the occupational goal; and</p> <p>(3) Lead to the attainment of a <a href="#">recognized postsecondary credential</a>.</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>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> <ul style="list-style-type: none"> <li>(a) Exposure to postsecondary educational possibilities;</li> <li>(b) Community and service learning projects;</li> <li>(c) Peer-centered activities, including peer mentoring and tutoring;</li> <li>(d) Organizational and team work training, including team leadership training;</li> <li>(e) Training in decision-making, including determining priorities and problem solving;</li> <li>(f) Citizenship training, including life skills training such as parenting and work behavior training;</li> <li>(g) Civic engagement activities which promote the quality of life in a community; and</li> <li>(h) Other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee.</li> </ul>
<p>7. Supportive services</p>	<p>Supportive services can be essential to the success of youth enrolled in workforce investment programming. TANF YDP providers are strongly encouraged to make supportive services available when they are necessary to enable an individual to participate in authorized TANF YDP activities; these services include transportation, childcare, housing, health/mental health care, educational testing, and work-related tools (e.g., eyewear, program uniform, etc.).</p>

<p>8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;</p>	<p>(a) Adult mentoring for youth must:</p> <p>(1) Last at least 12 months and may take place both during the program and following exit from the program;</p> <p>(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</p> <p>(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.</p> <p>(b) Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.</p>
<p>9. Follow-up services</p>	<p>WIOA describes “follow-up services” as critical services provided for at least 12 months following a youth’s exit from the program to help ensure that 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.</p> <p><b>NOTE: While encouraged, TANF Youth Development Funds do not provide for follow-up services; TANF YDP services end upon the completion of the 12-month cycle unless the participant re-enrolls or has additional funding available.</b></p> <p><b>WIOA funding will cover follow-up services for co-enrolled individuals after program exit.</b></p>
<p>10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;</p>	<p>“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.</p>
<p>11. Financial literacy education;</p>	<p>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.</p>

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 can be essential to the success of youth enrolled in workforce investment programming, therefore TANF Youth providers are strongly encouraged to make supportive services available when they are necessary to enable an individual to participate in authorized activities.

Additionally, partnerships must be cultivated with private and public-sector agencies to leverage and increase the resources available to meet the needs of youth. TANF participant referrals may then be made to partners who can provide other needed services for the overall support and success of a youth or young adult. Partners can include programs or agencies such as those funded by the U.S. Departments of Labor, Health and Human Services, Housing and Urban Development, and Justice, as well as faith and community-based organizations.

## YOUTH PAYMENTS

TANF 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,	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	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

placement in post-secondary education).	eligibility purposes, are not required to meet minimum wage requirements, are not dispersed as payroll, and income tax is not withheld.	usually indicates that a program views the youth as an employee.
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## 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. 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](http://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). 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 9 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](http://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 TANF 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 TANF 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

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.

## **POLICY EXCEPTIONS**

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

## **PERFORMANCE MEASURES**

TANF funds are broadly intended to be used to expand the availability of the 14 WIOA elements and provide workforce development activities for eligible young people. There are no specific performance measures required by the funding stream, however, all TANF-funded programs will be required by Partner4Work to have measurable outcomes specific to their program design that will include as a baseline that all youth participate in a work-based learning opportunity and at least 85% complete the experience.

Ultimately, the value in career exploration is that young people learn about their strengths and competencies, build the skills necessary to be successful in a future workplace, and they’re exposed to a variety of possibilities for career pathways. This is best done experientially in the context of an actual workplace. Below are the baseline required performance measures for a career exploration and experience program. Providers are expected to set at least two additional performance measures that speak to the goals of the program and demonstrate progress made by young people. Additional goals should be specific, measurable, attainable within a program year, reasonable and timely. Partner4Work reserves the right to add or modify performance measures in each year’s contract negotiation.

Percent of young people who develop a career plan known as an individual service strategy	100%
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Percent of young people who participate in a work-based learning experience	100%
Percent of young people who successfully complete a work-based learning experience	85%
Percent of experiences that align with one of the following industries: healthcare, technology, financial services, construction, or manufacturing	Propose
At least 2 other measures of success	Propose

## 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 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 these requirements as well.

### 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.

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 and 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.

### PROCEDURE

WIOA Title I Adult, Dislocated Worker, and Youth 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](http://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](mailto: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**

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.

## 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**.

**BARRIERS TO EMPLOYMENT:** Conditions that may make securing employment, completing credential/training programs or other job training/post-secondary programs difficult for certain individuals

**BASIC SKILLS DEFICIENT:** Refers to when an individual’s English reading, writing, or computing skills are 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.)

**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 for determining whether individual students are eligible.

**NOT ATTENDING ANY SCHOOL:** “Not attending any school” means a youth not receiving services from any one of the public or non- public institutions listed in the table below. 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.

Public Schools	Non-Public Schools
<ul style="list-style-type: none"> <li>• School districts</li> <li>• Charter schools</li> <li>• Cyber charter schools</li> <li>• Area career and technical schools</li> <li>• Intermediate units</li> </ul>	<ul style="list-style-type: none"> <li>• Private academic schools</li> <li>• Non-public schools (operated by a bona fide church or religious body)</li> <li>• Private academies and boarding schools</li> <li>• Private Residential Rehabilitative Institution</li> </ul>

**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:** An individual who has satisfied all applicable program requirements for the provision of services, including eligibility determination, an objective assessment, and development of an individual service strategy.

**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.

**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-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-EFFICACY:** An individual’s belief in his or her innate ability to achieve goals. Individuals who have high self-efficacy will exert sufficient effort that, if well executed, leads to successful outcomes, whereas those with low self-efficacy are likely to cease effort early and fail.

**SUPPORTIVE SERVICES:** Services rendered to participants to assist in overcoming barriers to secure credentials, employment or placement into a post-secondary or training program

**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

- [TANF YDP DESK GUIDE PY 2023 – 2024](#) (July 1, 2023 – June 30, 2024)

- US Department of Health and Human Services - [Federal Poverty Guidelines](#)
- TANF YDP [Frequently Asked Questions](#)
- TANF YDP [Screening Tool Q&A](#)

## POLICY UPDATES

### ELIGIBILITY

Date	Update
<b>7/1/2024</b>	<ul style="list-style-type: none"><li>• Revised definition table for “Not Attending Any School” to align with PA Department of Labor &amp; Industry Youth Eligibility Definitions WSP.</li><li>• Removed language requiring Selective Service registration.</li><li>• Update Federal Poverty Guidelines table to reflect 2024 Federal Income Guidelines.</li></ul>

**SELF-CERTIFICATION FORM**

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

<p><b>I HEREBY CERTIFY UNDER PENALTY OF LAW, THAT THE FOLLOWING INFORMATION IS TRUE:</b></p>          
--

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)

<p><b>The above Self-Certification is being utilized for verification of the following eligibility criteria:</b></p>    
--

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

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

<p>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.</p> <p>OR</p> <p>I ATTEST THAT THE DOCUMENT INSPECTION VERIFIED THE PRIMARY/SECONDARY ITEMS REQUIRED TO DETERMINE ELIGIBILITY FOR THE WIOA PROGRAM.</p>	
ELIGIBILITY SPECIALIST'S SIGNATURE _____	DATE _____

# 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](mailto:grievances@partner4work.org)



# WIOA TITLE I ADULT & DISLOCATED WORKER POLICY GUIDE



EFFECTIVE DATE: JULY 1, 2024

PARTNER4WORK PITTSBURGH, PA

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## 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/](http://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 26<sup>th</sup> 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).

### 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

[Self-certification](#) is an allowable source for documenting certain eligibility criteria for WIOA Adult and Dislocated Worker program participants. For Adult and Dislocated Worker participants, self-certification must be limited and only available as a last resort after all other sources of eligibility verification/documentation are exhausted. See attached **Self-Certification Form**.

### **Rare Circumstances**

Self-certification may be used to verify eligibility items requiring documentation that, in rare cases, may cause undue hardship for applicants to obtain, particularly those with [barriers to employment](#). Additionally, self-certification may be accepted from an individual who has experienced a loss of documentation due to:

- Natural or man-made disaster such as fire, flood, or tornado;
- Eviction from residence resulting in a loss of supporting documentation; or
- Individual is fleeing or has fled an abusive or untenable home situation.

### **Acceptable Eligibility Criteria**

Self-certification may only be used for Adult and Dislocated Worker participants for documenting the eligibility criteria listed below. Self-certification is not an allowable documentation source for criteria other than the criteria listed below.

- Homelessness (Adult)
- Date of 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 disaster (Disaster Dislocated Worker Grant)

### **Prohibited Use**

[Self-certification](#), including the WIOA Statement of **Family Size/Family Income Form**, must not be used for determining household size and/or income eligibility for WIOA services. The WIOA Statement of Family Size/Family Income Form may be used for documenting income when not needed for determining eligibility.

### **CWDS Case Note Requirements**

[Self-certification](#) is among the least preferred methods of documenting and verifying eligibility. If self-certification is used, a rationale must be provided via case notes describing that no other verification method is possible and that the provider is using self-certification as a last resort. Specifics should be added to describe why self-certification is the only available method of verification. Case 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 as the last possible method to verify this eligibility point.*



### **Telephone Verification**

Providers are encouraged to utilize telephone verification prior to [self-certification](#) for Adult and Dislocated Worker participants where possible. 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**.

### **Random Sampling Methodology**

To verify applicant self-certification usage and to monitor [self-attestations](#), 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. 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

<b>Population Size</b>	<b>Random Sample Size</b>
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.

### **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.<sup>1</sup> 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:

<b>Weekly Travel</b>	5-30 miles	31-75 miles	76+ miles
<b>Gas Card Amount</b>	\$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](#).

### Occupational Eligibility

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
<b>A. Employment 2nd Quarter after Exit:</b> Percentage of participants who are in unsubsidized employment during the second quarter after exit from the program	77%	80%
<b>B. Employment 4th Quarter after Exit:</b> Percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program	75%	78%
<b>C. Median Earnings - 2nd Quarter After Exit:</b> The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.	\$6,000	\$9,000
<b>D. Credential Attainment:</b> 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%
<b>E. Measurable Skill Gains:</b> 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
<b>1. WIOA Enrollment.</b> 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
<b>2. Job Placements.</b> 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
<b>3. Job Placement Rate.</b> Specific to A/DW. Number of "Job Placements" divided by program exits from A/DW Services during the contract period.	80%
<b>4. Self-Sufficiency Wage.</b> Specific to A/DW. Percentage of "Job Placements" that meet or exceed PARTNER4WORK's self-sufficiency wage (subject to change). <sup>10</sup>	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](http://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](mailto: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 Google Form](#) available at [www.partner4work.org](http://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.<sup>1</sup> 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"> <li>• Revised language to clarify when a supportive service can be determined to be “necessary to enable participation in WIOA career services or training”.</li> <li>• Revised language to clarify how providers may determine that a supportive service is unavailable through resources outside of WIOA funding.</li> </ul>

	<ul style="list-style-type: none"> <li>Removed references to the Near Completers Demonstration Grant.</li> <li>Updated Policy Exceptions section to direct reviewers to the P4W Policy Exception Form.</li> </ul>
<b>7/1/2024</b>	<ul style="list-style-type: none"> <li>Revised policy to restructure supportive service gas card distribution determined by mileage traveled to and from work or training at the established federal rate.</li> <li>Raised the weekly allowance of gas cards to \$75 from the \$60 cap for qualifying participants.</li> <li>Added childcare category to list of supportive services to align with DOL Green Infrastructure.</li> <li>Added section to establish disallowed supportive service categories.</li> <li>Added section to establish service codes for undefined supportive service categories.</li> </ul>

#### Self-Sufficiency

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

#### Individual Training Accounts

<b>Date</b>	<b>Update</b>
<b>12/15/2023</b>	<ul style="list-style-type: none"> <li>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.</li> <li>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></li> </ul>
<b>1/22/2024</b>	<ul style="list-style-type: none"> <li>Edited eligibility language to reflect the policy now having multiple ITA caps.</li> </ul>

**SELF-CERTIFICATION FORM**

<b>IDENTIFYING INFORMATION</b>			
Applicant's Name: _____	_____	_____	_____
	Last	First	MI
Address: _____			
_____			
Participant ID: _____ Application Date: _____			

<b>I HEREBY CERTIFY UNDER PENALTY OF LAW, THAT THE FOLLOWING INFORMATION IS TRUE:</b>

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)

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

<b>CERTIFICATION</b>
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

<p><b>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.</b></p> <p style="text-align: center;"><b>OR</b></p> <p><b>I ATTEST THAT THE DOCUMENT INSPECTION VERIFIED THE PRIMARY/SECONDARY ITEMS REQUIRED TO DETERMINE ELIGIBILITY FOR THE WIOA PROGRAM.</b></p>	
<p>ELIGIBILITY SPECIALIST'S SIGNATURE _____</p>	<p>DATE _____</p>

**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 \_\_\_\_\_

# 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](mailto:grievances@partner4work.org)

# WIOA TITLE I YOUTH POLICY MANUAL



EFFECTIVE DATE: JULY 1, 2024  
PARTNER4WORK PITTSBURGH, PA

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## 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](http://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 26<sup>th</sup> 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.

## SELF ATTESTATION

Self-attestation is a written, or electronic/digital declaration of information for a particular data element, signed and dated by the participant. Electronic signatures may include a submission from the participant such as an email, text, or unique online survey response that is participant generated and traceable to the participant.

Self-attestation is an important option for populations with barriers to obtaining eligibility and reporting documents and help ensure such populations can equitably access services.

**Note:** Self-Attestation (or self-certification) may be used to verify WIOA Title I eligibility when individuals cannot provide other verification sources without causing undue hardship for the participant. TEGL 10-23 explains that **self-attestation is sufficient for both eligibility determination and data validation purposes**. While Partner4Work, in alignment with federal guidance, does not promote the overuse or exclusive use of self-attestation, it does recognize its use as a viable alternative.

The following youth eligibility data elements may use self-attestation as a source of acceptable documentation:

- School status at program entry
- Date of birth
- Individual with a disability
- Pregnant or parenting
- Youth who needs additional assistance
- Foster youth
- Homeless youth
- Offender
- Low-income
- English Language Learner.

**Note:** 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”.

### **Telephone Verification**

Providers are encouraged to utilize telephone verification prior to [self-certification](#) where possible. 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](#).

### **CWDS Case Note Requirements**

While self-certification is not required to be limited or used as a last resort for eligibility determination, service providers must still provide a case note in CWDS describing the reasoning/need for using self-certification for a WIOA Youth participant.

Sample case note: *The WIOA self-certification form was submitted to verify homelessness. The participant did not have any other documentation available to prove their homeless status. We are utilizing the self-certification form as the last possible method to verify this eligibility point.*

**Note:** The example above is provided for information purposes only; copying and pasting a case note would not be compliant with the State’s case file guidance.

### **Random Sampling Methodology**

To verify applicant self-certification usage and to monitor [self-attestations](#), 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.

<p>2. Alternative secondary school services or dropout recovery, as appropriate;</p>	<p>“Dropout recovery” refers to services attempting to reengage students, who may have dropped out, through credit recovery, counselling, and educational plan development.</p>
<p>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;</p>	<p>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 <a href="#">Act</a> or applicable <a href="#">State</a> law.</p>
<p>4. Occupational skills training,* as appropriate; particularly training that leads to <a href="#">industry recognized credentials</a> aligned with in-demand industry sectors;</p>	<p>Occupational skills training is defined as an organized program of study that provides 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> <ul style="list-style-type: none"> <li>(1) Be outcome-oriented and focused on an occupational goal specified in the individual service strategy;</li> <li>(2) Be of sufficient duration to impart the skills needed to meet the occupational goal; and</li> <li>(3) Lead to the attainment of a <a href="#">recognized postsecondary credential</a>.</li> </ul> <p>*When youth are enrolled in academic or occupational skills training in WIOA programs, they must be assisted in earning an <a href="#">industry recognized credential</a> 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 <a href="#">industry</a></p>

	<a href="#">recognized credential</a> and demonstrating a measurable skill gain.
6. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors, as appropriate;	<p>Leadership development opportunities are opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors such as:</p> <ul style="list-style-type: none"> <li>(a) Exposure to postsecondary educational possibilities;</li> <li>(b) Community and service learning projects;</li> <li>(c) Peer-centered activities, including peer mentoring and tutoring;</li> <li>(d) Organizational and team work training, including team leadership training;</li> <li>(e) Training in decision-making, including determining priorities and problem solving;</li> <li>(f) Citizenship training, including life skills training such as parenting and work behavior training;</li> <li>(g) Civic engagement activities which promote the quality of life in a community; and</li> <li>(h) Other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee.</li> </ul> <p>(CFR § 681.520)</p>
7. Supportive services	<p>The term “<a href="#">Supportive Services</a>” 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.</p> <p>Supportive services are also able to be provided and expenses incurred for youth in follow up.</p>
8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;	<p>(a) Adult mentoring for youth must:</p> <ul style="list-style-type: none"> <li>(1) Last at least 12 months and may take place both during the program and following exit from the program;</li> <li>(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</li> <li>(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</li> </ul>

	<p>the youth with an individual mentor with whom the youth interacts on a face-to-face basis.</p> <p>(b) Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.</p>
9. Follow-up services	<p><a href="#">Follow-up services</a> 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.</p>
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;	<p>"Comprehensive guidance and counseling" provides individualized counseling to <a href="#">participants</a>. 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.</p>
11. Financial literacy education;	<p>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.</p>
12. Entrepreneurial skills training;	<p>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.</p>
13. Services that provide labor market information, such as career awareness, counseling, and exploration;	<p>"Labor market information" includes the identification and/or analysis of topics such as employment, unemployment, local employment dynamics, and occupational projections.</p>
14. Activities that help youth prepare for and transition to post-secondary education and training.	<p>"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.</p>



## 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.

<b>INCENTIVES</b>	<b>STIPENDS</b>	<b>WAGES</b>
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](http://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](http://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 Google Form](#) available at [www.partner4work.org](http://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
<b>Programmatic Retention</b> The percentage of participants who start and complete the program.	90%
<b>Measurable Skills Gain</b> The percentage of program participants who, during a <b>program year</b> , 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. _ <b>Note:</b> Participants enrolled in a program in multiple program years must demonstrate a measurable skill gain <u>each program year</u> .	85%
<b>Obtainment of a Degree or Certificate</b> The percentage of participants who have attained a diploma, a high school equivalency, or <a href="#">industry recognized credential</a> 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.	75%
<b>Placement upon Exit</b> 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	85%
<b>Employment (2nd Quarter after exit)</b> 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.	75%
<b>Employment (4th Quarter after exit)</b>	75%

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.	
<b>Median Earnings</b> Median earnings of participants who are in unsubsidized employment during the 2nd quarter after program exit.	\$3,500
<b>Number of Youth referrals or youth attending Partner4Work initiatives</b> 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.	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](http://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](mailto: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"> <li>• School districts</li> <li>• Charter schools</li> <li>• Cyber charter schools</li> <li>• Area career and technical schools</li> <li>• Intermediate units</li> </ul>	<ul style="list-style-type: none"> <li>• Private academic schools</li> <li>• Non-public schools (operated by a bona fide church or religious body)</li> <li>• Private academies and boarding schools</li> <li>• Private Residential Rehabilitative Institution</li> </ul>
<b>Post-Secondary Institutions (Public or Private)</b>	
<ul style="list-style-type: none"> <li>• Community college</li> <li>• 2-year college</li> <li>• College</li> <li>• University</li> <li>• Authorized degree granting institution (Pennsylvania Dept. of Education)</li> </ul>	

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"> <li>• Revised eligibility section to align with federal and state guidance on the use of self-attestation/self-certification for WIOA Youth participants.</li> <li>• Revised definition table for “Attending School” to align with PA Department of Labor &amp; Industry Youth Eligibility Definitions WSP.</li> </ul>

## SUPPORTIVE SERVICES

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

**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: _____
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**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
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<p><b>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.</b></p> <p style="text-align: center;"><b>OR</b></p> <p><b>I ATTEST THAT THE DOCUMENT INSPECTION VERIFIED THE PRIMARY/SECONDARY ITEMS REQUIRED TO DETERMINE ELIGIBILITY FOR THE WIOA PROGRAM.</b></p>	
_____ ELIGIBILITY SPECIALIST'S SIGNATURE	_____ DATE

# 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:

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**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](mailto: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	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-certification
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
Food Stamps; Cash assistance; SSI benefits	Public assistance records (COMPASS document)
Lives in a high poverty area	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.	

# PARTNER WORK

**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:

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 dropout	Dropout letter; school record; self-certification; telephone verification
Homeless or runaway	Letter from shelter or individual providing shelter; self-certification; telephone verification
Foster child/aged out	Court documentation, self-certification; telephone verification
Individual with a disability	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-certification

**OR**

Eligibility point	Most common documentation
Basic skills deficient	Standardized test score (TABE or CASAS); school records
English language learner	Self-certification
Requires additional assistance	School letter; court documents; self-certification; telephone verification
AND	
Income eligibility	Most common documentation
Family income below 100% of the poverty line	Pay stubs; pension statement; UC documentation
Food Stamps; Cash assistance; SSI benefits	Public assistance records (COMPASS document)
Lives in a high poverty area	High poverty look up tool