



WIAB 11-00

DATE: February 8, 2001
TO: All Local Workforce Investment Areas
FROM: Cheryl A. Brush, Chief, Workforce Systems Bureau
SUBJECT: Questions and Answers—Series 2

Attached is a compilation of questions and answers submitted in response to issues identified in the training survey. These are being made available to the system to ensure a common understanding of the issues.

Please contact your grant officer if you have any questions.

Attachment

YOUTH PROGRAMS—Eligibility

Q. Where do we locate what is required for documentation of the youth barrier group, “requires additional assistance to complete an educational program or to secure and hold employment”?

A. Each local board is authorized to define this term for their region; each region’s definition (quite lengthy!) is reflected in the Eligibility TAG. However, details regarding “acceptable documentation” are not specified – we’ll add this!! In the meantime, some of what’s included in the definition (like disabled) is found in other categories of eligibility with “acceptable documentation” listed. The majority of the definitions are related to education. School records or a statement from a school representative would be “acceptable documentation”. If you have further questions, feel free to call PTSU or your grants manager for assistance.

Q. What are we to use to determine basic skill deficiency (what standardized test or school record)?

A. The definition of basic literacy skill deficiency is determined by each local board, although the Act states that the local definition must include one of the following, at a minimum:

- a. computes or solves problems, reads, writes, or speaks English at or below eighth; or
- b. is unable to compute, solve problems, read, write, or speak English at a level necessary to function on the job, in the individual’s family or in society.

Although the suggested definition contains two options for defining this deficiency, some of the boards have opted to define the deficiency only by the first option above; you will need to consult the Eligibility TAG for the definition being used in your region. The TAG is currently being revised to correct for some incorrect regional definitions, so you’ll need to check with your grant officer to be sure that the definition you are using is the current one until the revised TAG is out.

So how do you go about determining that this deficiency exists? That depends on your purpose and on your region. For eligibility purposes, you can either administer the TABE locator or another regionally-approved testing instrument, or, if the local board allows it, use an official school record that translates reading or math into a corresponding grade level. In those regions that have retained both options for basic literacy skills deficiency, documentation of the existence of the second option would be the same as for other barriers - documentation by a cognizant agency/ individual, etc.

To enroll a youth as basic skills deficient under the 5% window or to declare a high school graduate an out-of-school youth by virtue of basic skill deficiency, you **MUST** use a standardized test or school record that will demonstrate that the youth is

functioning at or below the 8th grade level. That is, even in the regions that include the second option in defining basic literacy skills deficiency, you may not use this option for the 5% window or for determining whether a youth may be considered out-of-school.

For skill attainment purposes, use of the TABE locator is not sufficient to establish a pre-program basic skill level; you may use it to get a preliminary indication of basic skill deficiency, but if the locator does suggest a deficiency, you will need to use your regionally-approved instrument (usually the TABE diagnostic battery or the TABE survey, but some regions have identified additional tools) to specifically define the point at which the youth is functioning prior to WIA intervention. This will become your baseline from which to measure and report attainment of basic skills goals.

If your regional skill attainment system allows it, you can also use any school records that can identify specific grade-level functioning at program entry. Be careful here, though, as you will want to use the same type of record for both pre- and post-test and not all school records are updated within the timeframe in which you'll be reporting skill attainments (or the lack thereof).

Q. If the applicant is homeless or a runaway and is under 18, who signs in terms of parent/guardian, especially if they are not connected with a Social Service Agency or temporary shelter?

A. If the applicant is under 18 years of age, the parent or guardian must sign the application form. In the event the applicant is a minor and is living with persons who do not qualify under the definition of "family", verification of emancipation must be obtained to allow the minor applicant to sign the application form for enrollment. An emancipated youth is defined as an individual who is fourteen but under age eighteen who is married or whose circumstances indicate the parent-child relationship has been renounced.

Q. Can you please review what is out of school, what is other?

A. The federal definition for "out of school youth" is: 1) a dropout, or 2) has a high school diploma/GED but is basic skills deficient, unemployed or underemployed. Youth enrolled in alternative schools are not school dropouts.

If a high school graduate is NOT basic skills deficient, is NOT unemployed, is NOT underemployed, he falls in the "other" category. This definition is reflected in the MIS help screens and reviewed in the WIA administrative email dated August 11th.

Q. The definition of out of school appears very broad... the majority of youth inquiring into the program may be out of school youth, because someone who is not basic skills deficient, not unemployed, and not underemployed wouldn't be seeking assistance, would they?

- A. Yes, the definition for out of school is broad, but targets to those who most need services. At least 30% of an area's funds must be expended on out of school youth. However, those seeking assistance can be impacted by your program design and your outreach efforts – you may design and market services to youth still attending secondary school, or you may design and market services for out of school youth, or both!!

ADULTS AND DISLOCATED WORKERS—Eligibility

Q. When should we verify the 200% of poverty?

- A. Before moving an employed individual beyond the core level of services, federal regulations require the following determination: is the individual already self-sufficient and therefore not in need of a higher level of WIA assistance OR is the individual not self-sufficient and therefore in need of and eligible for intensive services? The state has adopted the 200% of poverty income guideline to be applied in this determination. The WIA 74C form documents/verifies this determination. Since the majority of individuals registered will be expected to advance from core to intensive services within 30 days of enrollment, a 74C should be completed as part of the initial enrollment process. This determination is valid for movement to intensive services within 30 days of enrollment. If an individual moves beyond core services after the 30-day timeframe, the determination process should be repeated and another 74C completed. If an individual is enrolled in core services with no intent of moving beyond core services in the next 30 days, please note such in the enrollment packet and a 74C will not be required.

Q. What if a dislocated worker/adult is in approved training and obtains work that reaches self-sufficient guidelines – do we remove them from the program without completing training?

- A. WIA does not require removal from the program. The case manager must determine the appropriateness of continuation in WIA. Is completion of the course necessary/beneficial for client's continued employment? Does the work schedule conflict with the class schedule? The goal is to prepare the individual for his or her long-term self-sufficiency so in some cases it may be very appropriate to delay exit until the individual has gained the skills identified in the plan.

Q. What are the income exclusions and inclusions for Adults and Dislocated Workers?

A. INCLUSIVE INCOME

- Alimony
- College or University Grants, Fellowships, and Assistantships, other than needs-based
- Dividends, Interest, Net Rental Income, Net Royalties, Periodic Receipts from Estates or Trusts
- Gross Wages or Salary (includes WIA OJT wages, vacation, sick, and severance pay)

- Net Gambling or Lottery Winnings
- Net Self-employment Income
- Other Regular Support from an Absent Family Member or Someone not Living in the Household
- Pensions - Private or Government Employee (Including Military Retirement Pay)
- Railroad Retirement, Strike Benefits from Union Funds, Worker's Compensation, and Training Stipends
- Regular Insurance or Annuity Payments
- Regular Payments from Social Security (except Old-age and Survivors Insurance Benefits received under section 202 of the Social Security Act (42 U.S.C. 402))
- SSDI

EXCLUSIVE INCOME

- Any Amounts Received as Pay or Allowances While Serving on Active Duty as well as the following veterans benefits: Service Connected Disability Payments, Montgomery GI Bill, Training/Rehabilitation Benefits for Service-Connected Disabilities, Apprenticeship/OJT Training Payments and Correspondence Course Benefits, Dependent Compensation for Service-Connected Death Payments, V.A. Survivor's and Dependent's Educational Benefits, Educational Assistance for Enlisted Members of the Selected Reserve of the Ready Reserve.
- Any Assets Withdrawn from a Financial Institution, or Proceeds Received from the Sale of Real or Personal Property, i.e. a House or a Car
- Capital Gains
- Cash Welfare Payments (Including TANF/TAFI, SSI, Refugee Cash Assistance, and General Assistance)
- Child Support
- Needs-Based Scholarship Assistance or Financial Assistance Received Under Title IV of the Higher Education Act (Pell Grants, Federal Supplemental Educational Opportunity Grants, and Federal Work Study)
- Non-Cash Benefits (Employer Paid Fringe Benefits, Food or Housing Received in Lieu of Wages, Medicare, Medicaid, Food Stamps, School Meals, and Housing Assistance)
- Old-age and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C. 402)
- One Time Unearned Income (Tax Refunds, Gifts, Loans, Lump-sum Inheritances, One-time Insurance Payments or Compensation for Injury)
- Payments Made to Participants of Federally Assisted Needs-Based Employment and Training Programs (CRT, Work Experience, SYETP, Job Corps)
- Payments Received on Behalf of Foster Children
- Unemployment Compensation

NOTE: Unless income is listed in the above exclusive income category or is excluded by Federal statute, as a general rule, one-time lump sum payments are to be considered exclusive income and on-going income is considered inclusive income.

When a Federal statute excludes income received under that statute in determining eligibility for programs operated under other Federal laws, such income is also excluded in WIA eligibility determination.

For further guidance or clarification for income inclusions/exclusions not listed above, please contact your Grants Manager.

Q. How long before a dislocated worker is no longer eligible? What is the time frame for eligibility for displaced homemakers?

A. The same timeframe applies to all dislocated worker eligibility categories – the dislocation must have occurred within the last two years. Please note that if after dislocation the individual obtains subsequent employment, it may nullify the first employer for eligibility into the Dislocated Worker program. Because an individual was dislocated within two years does not necessarily mean the individual is eligible for the Dislocated Worker program.

Q. What is the timeframe for eligibility for displaced homemakers?

A. All categories of dislocated workers have the same timeframe: the dislocation must have occurred within the two years prior to the application date.

ASSESSMENT AND TRAINING PLANS

Q. Can you please review required topics/issues that need to be documented in the training plan?

A. **ADULTS**

Core and Intensive Services

The development of an actual employment plan should begin about the time a case manager decides a participant is not employable through core services and moves the participant to intensive services. An analysis of the participant's occupational skills and personal circumstances would be recorded at this time. If intensive services are sufficient for the participant to secure employment, the case manager records an employment goal, describes the service(s) that will help the participant achieve his/her goal, and provides labor market information that supports the occupation.

Training Services

A training plan is developed if the participant is not successful in securing employment through intensive services. The training plan must describe: the process(s) that was used to determine the training goal; the service or combination of services that will be necessary to secure the goal; and labor market information that

supports placement in the occupation. Chronological case notes should support ongoing case management efforts that occur after the plan is developed.

YOUTH

A major difference between the adult and youth plans is the delivery of service. The youth training plan does not consider a multi-tiered placement approach; instead, it places an emphasis on education and skill attainments that may be necessary before the participant is fully employable. A youth training plan includes an analysis of the participant's educational needs, occupational skills, and personal circumstances. It should include an education goal when appropriate, an employment goal, a description of the services necessary to achieve these goals, and labor market information that supports the employment goal.

In addition, skill attainment goals are required for all in-school youth, ages 14-18, and for any out-of-school youth (ages 14-18) when needed.

Q. Which of the forms are required, which are optional?

A. As noted in the Assessment TAG, the "ADULT EMPLOYMENT PLAN" is the only assessment form required for adults/dislocated workers; the "YOUTH TRAINING PLAN" is the only assessment form required for youth. The Assessment TAG provides a variety of other optional tools/forms that we hope will assist you in the ongoing assessment process.

Q. Can the logs substitute for some of the assessment information?

A. As noted in the Assessment Tag, log notes are an extension of the "Adult Employment Plan", or the "Youth Training Plan". The case manager is free to document on the form OR in the log. However, the case manager should keep in mind that the client will sign the plan, thereby agreeing to what is documented on the plan.

Q. Is there an expected minimum timeframe for assessment?

A. No. The length will vary based on client need.

Q. Ideas on goal setting for youth. Example – following instructions, initiative. What would this type of goal look like?

A. It's important to distinguish here between long-term goals for a youth and short-term, annual skill attainment goals, which are more like objectives, really, than goals. Your long-range goal(s) should identify the results you want to achieve with that youth at the point they complete the follow-up after they exit the program; skill attainment goals identify the intermediate increments by which the youth will be staged annually toward that eventual goal.

Each regional skill attainment system identifies reportable skill attainments on an annual basis, so your skill attainment goals/objectives should be set in accordance with your regional system. Work readiness skill attainments are reportable in two clusters at present – pre-employment and work maturity; the example raised in this question falls into the work maturity category. In order to count this kind of annual attainment, a youth must be proficient (according to regional standards) in all of the individual skill areas within each cluster, although the provider only needs to work on those in which the youth is actually deficient. For work maturity, the skill areas are punctuality, attendance, ability to follow instructions, task completion, showing initiative, appearance, and interpersonal relationships. So, your goal might be something like “To demonstrate work maturity skills, focusing specifically on ---, ---, ---, over a period of --- days/weeks (determined by regional system) to local employability standards, as identified by [the IWB] and as measured by [IWB-approved assessment tools].” Then you would want to talk the youth through the expectations and how you will measure their accomplishments.

Q. Can I set a basic skill goal of completing the current year of school and advancing to the next grade? That way I could take a goal attainment every year as long as the student advanced to the next grade. That would seem to be the only way to keep a student on the program for longer than two years if the student is still in junior high or high school.

A. That depends on your local skill attainment system and whether you can demonstrate that the youth needed WIA services to accomplish that advancement to the next grade. By definition, skill attainments are designed to address some sort of need and to overcome some sort of deficiency (that is, to help a youth accomplish something that without WIA’s help they would probably not be able to do). If your local board recognizes advancement to the next grade as an attainment under certain circumstances and your situation matches those circumstances, then it would be reportable.

Q. Work readiness skills/JTPA work maturity tools – are we still using them? How do they work in with SCANS skills requirements?

A. As indicated above, each local workforce board will be establishing a regional skill attainment system that will identify the reportable skill attainments and tools by which attainment of these skills can be measured. Local measurement tools must either be standardized tests or must meet criteria established by the U.S. Department of Labor; as it happens, youth competency systems under JTPA were already certified as meeting the same criteria and are therefore being used in most of the regions. Consequently, you may indeed be using these tools at least for the first year of WIA. Local areas may be revising these tools for subsequent years; any revisions will have to meet USDOL criteria.

As a skill attainment system, we have not yet begun to incorporate the attainment of SCANS skills as a whole into the WIA skill attainment system, although this may be happening in some of the regions with some of the SCANS skills. Incorporation of SCANS skills into skill attainment systems on a broader scale will probably happen when the base systems are enhanced over the next couple of years.

LEVELS OF SERVICE – CORE, INTENSIVE, TRAINING

Q. When do we enroll in WIA?

A. All adults are eligible for *self-service* core services, which do NOT require registration. Once services involve substantial WIA staff time, the individual should be enrolled. In a Job Service office, assessment and job search may be provided by ES-funded staff without enrollment in WIA. If WIA-funded staff provides services beyond self-service or informational services, enrollment in WIA would be necessary.

Q. *How do we convince a client that being registered is a plus if not providing training and ES could do vocational guidance?*

A. Convincing a client to register for WIA service could be approached from the angle that after completion of the application, the staff person will personally assist the client with ongoing services until self-sufficient employment is located. This is a higher level of service than is generally available in ES due to the constraints of staff time.

Q. *When we have over 50 applications for WIA and our funding is very limited, how do we set our priorities for who we register?*

A. Priority for enrollment into intensive or training services in the adult program must of course be given to individuals who meet low-income requirements. Each region is expected to establish procedures for giving priority to low-income individuals who otherwise qualify for enrollment in intensive or training services in the adult program. The eligibility criteria for intensive and training services is in itself a screening tool in that only those individuals who require and can benefit from the services are to be offered those services. Beyond these fundamental program requirements, every region and every provider must grapple with the selection issue. The most effective selection models we have seen around the state include some form of committee review and approval.

The One Stop system is intended to broaden access to the services of all One Stop partners and to introduce applicants to a wide variety of financial aid opportunities. It is always appropriate to make referrals and/or co-enroll individuals when this will assist in completing an employability plan and helping an individual to attain self-sufficiency. WIA should not be regarded as a stand-alone program separate from the offerings of the partners.

TUTORING, STUDY SKILLS

Q. How do we provide study skills?

A. Study skills training, per se, is not a required service and should not be viewed in that light. Should a case manager determine, however, a youth's performance in school could be improved with better study habits, these could be provided through informal guidance from the case manager, through the services of a tutor, or referral to appropriate resources within the community. The rationale behind this whole first element of the required ten is that case managers should be assisting youth with the removal of whatever barriers threaten completion of secondary school.

Q. Where are we finding tutors?

A. Local public schools are the best place to locate tutors, since they frequently find such individuals for students needing this service.

Q. Is there a screening process?

A. Over the years, we have not required screening of tutors; it has been our assumption that tutors are arranged through connections with local school districts and have been through some sort of screening process. We have also operated on the assumption that the "carrot" that minimizes the risk of inappropriate behavior is the paycheck we provide for the tutoring service, unlike the volunteer nature of a mentoring relationship. The safest route here would be to use only school-referred tutors.

Q. How do we pay them?

A. You would pay tutors using an 04, just as you pay any other vendor for services/products rendered.

Q. Where do they meet the student to tutor?

A. Students and their tutors should be meeting in public locations. They should NOT be meeting privately in the home of either the tutor or the student.

LEADERSHIP DEVELOPMENT SKILLS

Q. What are "leadership development opportunities" and how do we provide them?

A. Leadership development opportunities are not unlike the "citizenship skills" of JTPA days. These kinds of activities are designed to help youth become productive workers and responsible citizens and focus on such things as teamwork, problem-solving, self-esteem, initiative, commitment to life-long learning, and an ethic of civic responsibility. Activities might include orientation to post-secondary educational opportunities, service learning projects, peer tutoring, training in setting priorities and

responsible decision-making, classes on parenting, budgeting, self-esteem building, diversity awareness training, healthy lifestyles, and positive work attitudes and behavior. These could be provided directly by WIA-funded staff, through incorporation of these fundamentals into other activities in which the youth is participating (e.g., incorporation of SCANS skills into work-based learning opportunities) or through referral to other resources in the community. There is no requirement to provide any specific amount of this required element.

MENTORING

Q. What monitoring should the service provider perform when a participant is in a mentoring activity?

A. In terms of monitoring mentoring activities, you will need to make contact with mentors, mentees, and parents periodically to ensure that the mentoring relationship is progressing smoothly, is positive and offers value to both parties. Contacts should be in person whenever possible, but may also be by phone or email, and are required no less frequently than monthly. More frequent monitoring may be prudent during the early months of a relationship. When any of these contacts indicate problems with the mentor/mentee relationship, you may need to increase both the frequency and/or intensity of your monitoring to identify the source of the problem and determine an appropriate course of action. All such concerns need to be logged in the mentor file.

WORK EXPERIENCE, JOB SHADOWING, INTERNSHIPS

Q. What does a Work Experience supervisor use to do an evaluation?

A. The case manager and site supervisor may use the 175 or 185 to evaluate the participant's progress. Your regional skill attainment system may require additional forms here as well.

Q. If a youth is on the program 4-5 years, is summer youth work experience appropriate?

A. There is no rule or policy specifically addressing this situation. For each unique client, the case manager must continually determine what, if any, WIA services are necessary and appropriate to reach the goal(s) reflected on the plan. Such determinations should always be documented in the participant's file. Use of work experience as a vehicle to measure attainment of work readiness skills will need to comply with the regional skill attainment system's benchmarks and processes.

Q. What type of monitoring/evaluation are you expecting?

- A. Monitoring of activities which use worksites (work experience, job shadowing, internship, OJT) will include review of the client's employment/training plan to determine what skills the activity is providing the client, and how the activity leads the client toward obtaining self-sufficient employment; review of the client file to ensure completion of all required forms (job description or training plan, contract, W-4 when appropriate); review of online entries to ensure compliance with the activity's time/wage constraints; random selection for onsite visits, where we will interview the client and the employer to ensure compliance with the activity's contract, FLSA, any other applicable regulations.

Q. Job Shadowing – is this really beneficial? Work Experience, when do we use it?

- A. As a case manager, you are free to determine which WIA activity(s) are best suited to assist your participant in acquiring the skills necessary to reach the outcomes established in the employment/training plan. Flexibility within these activities (within the parameters outlined in the corresponding TAGs) allows the case manager to creatively use an activity to meet the unique needs of the participant.

As noted in the TAG, Job Shadowing is a tool you may incorporate for a participant who has not identified a specific career choice. The TAG outlines the concepts of this activity - exposure to occupations/industries which may assist in identifying potential career paths.

Work Experience component is an ideal setting for participants to acquire SCANS and work maturity skills. In addition, Work Experience can be an excellent career planning mechanism for the participant, providing occupational sampling and exposure to the unique aspects of specific vocations, including non-traditional employment opportunities for men and women.

Q. Summer work opportunities must be available to the students. However, can we place someone in a summer work experience once they have already reached a Work Maturity goal? OR would we then just need to work with him/her to find regular employment? Which would be fine if he/she were at least 16 years old.

- A. Please note there is no requirement to provide any specific activity to any specific group – you are not required to provide summer work experience to students. Youth programs within a local area must provide access to the 10 youth elements, either by delivering the 10 elements or by coordinating access via other organizations. Per the regulations, the case manager has “the discretion to determine what specific program services will be provided to a youth participant, based on each participant's objective assessment and individual service strategy.” This means that the use of any WIA activity is a decision made by the case manager based on the individual participant's needs.

Also, it is important to know that WIA activities (assessment, job search, work experience) have no direct link to youth goals. A youth goal may be reached using

one of many of the WIA activities available. In the instance you cite, if the participant has reached their work maturity goal, work activities other than work experience may very well be more appropriate. If you are confused regarding this issue, please contact your grants manager.

Q. When would it be appropriate to use (an Internship)?

A. Generally, an Internship is appropriate for those participants who have skills and training, but no or limited work experience or have not worked for some time. The purpose of an Internship is to provide the participant an orientation to the work place. Preferably, the Internship will take place in an arena similar to that of the participant's work preparation. The Internship can be as fundamental as offering a participant experience with work requirements such as timeliness, working with others, standards of grooming and dress, and working under supervision. It can also be an initial opportunity to apply skills learned in training, earn a salary comparable to that of other employees with similar skills in a similar position and gain references that enable the participant to enter the work place.

Q. When is Work Experience or Internship appropriate for an adult?

A. Work Experience/Internships are appropriate for youth, adults, and dislocated workers who are new entrants to the labor force or have been out of the workforce for a significant amount of time. Each individual's circumstances should also be taken into account; for instance, if an individual were dislocated due to medical reasons an internship *may* be helpful to enhance occupational training.

During the assessment process, the case manager and client work together to identify a self-sufficient occupational goal and then review/discuss training options for that occupational goal. Selection of a specific training option will vary with each client's occupational interest and prior experience or training, and the availability of an employer willing to provide the training and supervision necessary to make the Work Experience/Internship meet the client's needs.

CLASSROOM TRAINING & EDUCATION SERVICES

Q. I am assuming that payments for regular registration and class fees for high school students are okay. What about school supplies? What about payment of athletic uniform fees, debate fees, choir fees, etc.? There are all activities that help keep youth interested and attending school as well as develop social skills.

A. Payments for registration, school supplies, and other required fees are acceptable. The key is to determine whether these are required. In an instance where the student is required to include a PE course in order to graduate, a fee associated with that participation would be acceptable if no other resources are available. In elective activities such as debate, choir or extra-curricular sports, students are often given opportunities to earn their fees or parent "booster" clubs often provide resources for

trips, competitions, etc. These are valuable activities where students learn from participating in the fundraising activities as well as the events, but they are not appropriate for WIA payments.

Q. When is it appropriate to enroll a WIA Adult or Dislocated Worker into academic training?

A. Academic training is allowable if the training program is included on the State Eligible Training Provider list and completion of the training program will lead to self-sufficiency through successful placement into employment.

Q. When current program participants change their long-term goals and are considering pursuing a 4-year degree, what would be more appropriate: (a) terminate them, or (b) hold onto them until they begin their junior year of their academic studies and fund them their last two years and then exit them from the program after they complete their academic program?

A. Again, the answer would depend upon the needs of the participant and the opportunities available in the region. With the advent of WIA and the ITA process, we will expect fewer and fewer opportunities to be available via the academic side of a college or university. Although it is unlikely you will use WIA funds to pay for academic training, you can maintain a participant enrolled in academic training in WIA if a participant is receiving services paid for by another entity and the training is part of the overall employment plan for the participant.

WIA may be used to provide case management support or guidance and perhaps some necessary supportive services. You would also want to consider whether s/he has the interest/aptitude/ability to be successful in the new field and whether the labor market supports unsubsidized employment at a self-sustaining wage? You would also want to determine whether your region allows academic training or has entered into an MOU with the training provider or other partner paying for the training so that you can keep the participant in active status in WIA. There is no opportunity to simply “hold” someone with no activity on our part or the part of a partner.

Q. What tools are available to help me do this as a last resort? How do I steer people away from the old JTPA train-me mentality?

A. Training should not be regarded as a “last resort”. Rather, it is intended that training be provided only to those who require and can benefit from it. The development of an employability plan should assist you in communicating the process to your clients – WIA will provide the service level needed to move the client to self-sufficiency, which may or may not involve “training” as known under JTPA.

WIA’s adult and dislocated worker regulations provide for three levels of services: core, intensive, and training, with service at one level being a prerequisite to moving to the next level. Also required is the case manager’s determination that intensive or

training services are required for the participant to achieve the goal of obtaining/retaining employment. The employment plan's design will guide you through the steps necessary for each level of service and it collects the documentation necessary to move to a higher level of service.

Q. Would it be appropriate to continue services for a youth who graduates from high school and goes on to academic college for about a year to help him/her be successful in academic pursuit?

A. It is difficult to answer this question without knowing what specific services are intended or necessary. If the participant's success is dependent upon on-going, regular support (mentoring/tutoring come to mind), it would probably be appropriate to continue his/her active participation in the program. On the other hand, many services can be provided during the 12 month follow-up period thus allowing the case manager to exit the participant after HS and still provide occasional or incidental service for 1 year.

INDIVIDUAL TRAINING ACCOUNTS

Q. When do you use an ITA? When do you use "A" (general training) on 04?

A. There are two choices under TRAINING:

CODE A - GENERAL TRAINING: May be used for youth, adult, or dislocated worker as follows:

YOUTH: use this code for purchase of any training items (tuition/books/etc.) for youth.

ADULT/DISLOCATED WORKER: Use this code for purchase of any training items that do not meet the criteria listed below for Code C - Individual Training Account. Note this code cannot be used to purchase "occupational" training which requires an ITA for Adults and Dislocated Workers.

CODE C - INDIVIDUAL TRAINING ACCOUNT:

ADULT/DISLOCATED WORKER ONLY: This code when purchasing any occupational training (tuition/books/etc.), from an eligible training provider (those institutions listed on the State's eligible training provider list) and the participant is enrolled in a "TRAINING" activity (occupational classroom trng code 21, job readiness training code 22). Since Code C, Individual Training Account, is only appropriate for adults and dislocated workers, the accounting system will no longer accept Code C entry on a Youth record.

ELIGIBLE TRAINING PROVIDERS

Q. Some JTPA training providers are not on the Eligible Training Provider List. Is this an oversight?

A. Your local board is responsible for providing the application to training providers. They must also approve the application before the school will be placed on the Eligible Training Provider List. Please contact your local IWB staff if you are concerned about the status of any training provider.

Q. Is it possible to add a “search” capability to the eligible training provider list? Could you notify us when providers are added to the list?

A. The eligible training provider list already has search capabilities. A user can search by school or by course. Simply click on the header of either of those columns. We’re adding a red highlight and pop-up instructions to those headers so that users will better understand their options. We’ll notify all users via the global email when a new school is added to the list.

ON THE JOB TRAINING

Q. With an OJT, can we pay for basic computer skill training?

A. Basic computer skills training may be combined with an OJT. However, WIA should not pay for any training or supportive services which the employer typically provides for his/her regular employees.

Q. What supportive services might be appropriate?

A. Supportive services are those services necessary to enable a participant, who cannot pay for such, to continue participation in a WIA program activity. Examples of these services are listed in your Supportive Service–Insurance TAG. A case manager may assist an OJT or an Internship participant with the supportive services necessary for the participant to continue in the activity.

Such services might be transportation costs to and from the worksite or a set or two of appropriate clothing or shoes. Employer required uniforms or tools may be purchased also; however, caution should be taken with this type of expenditure to assure that the employer does not supply these items for “regular” employees, as participants must be treated the same as regular employees. Participants should not become reliant on WIA to subsidize their income over the long term. We would generally not expect to see a need for supportive services after the participant receives their first paycheck

Q. What is different from JTPA?

A. For an OJT, the essential difference is:

- 1) Eligibility. Under certain conditions outlined in the OJT TAG, OJT eligibility has been extended to employed participants who need training to maintain or attain self-sufficiency and, under specific conditions, an OJT may be set up for an employee with his/her current employer.
- 2) The OJT must be indicated in the Employment Plan.
- 3) Local areas may set standards to determine the length of the OJT.
- 4) Monitoring is no longer required; however, site visits to assist in setting up the OJT and to assist the employer and participant in problem solving are recommended.

For an Internship, the difference is that they are allowable for adults. Internships are discussed in depth in the Internship TAG. They are typically used with a private for-profit employer and may be combined with occupational skills training. Wages must be paid at the Federal minimum wage or higher, depending on the participant's skills and qualifications and typical hourly wage offered by the employer to employees with comparable skills and qualifications.

Q. How do we sell an OJT to an employer?

- A. Various methods may be used to "sell" an OJT to an employer. The major ingredient in a good "sell" is to match the needs of the target with the assets of that which you are selling. Target an appropriate employer who has the desired job opening. Clarify to the employer that the participant has received an in depth assessment and has all of the essential qualifications, interests, aptitudes and work experience to be, with training on the job, a dynamic asset to the employer's workforce. Discuss with the employer that 50% of the wage rate is reimbursed to cover the extraordinary costs and additional supervision related to the OJT. Inform the employer that the training is designed to fit the participant to the position description and his/her workforce needs exactly.

Alternatively, you can assist the participant in targeting employers with openings in the participant's occupation of choice. The participant can call targeted employers to explain the program and obtain an interview. The participant, armed with interviewing skills, an excellent resume and a letter from you providing more detail about the OJT program, can interview with the employer. Be sure to request in the letter that the employer contact you if interested in contracting the OJT.

Q. What raise level justifies OJT at the same employer?

- A. An employed worker may participate in an OJT, if eligible, with his/her current employer under certain conditions:

- 1) The OJT candidate first must meet the eligibility requirements for Core services, then for Intensive services and finally for Training services. The participant's employment plan must indicate an OJT in the occupation for which the employer has an opening.
- 2) The employee must not be earning a self-sufficient wage. Although all employed participants must meet the self-sufficiency eligibility test, the case manager must be cautious in when negotiating an OJT agreement to train a participant with his/her employer, taking care to assure that the OJT is not taking the place of routine training and promotional opportunities provided employees.

An example of circumstances in which an appropriate current employer/employee OJT might occur is when the employer has advertised an opening, for which an eligible participant, who happens to be employed by the employer, is interested. The participant has the ability to learn, but not the skills for the position. The employer does not have an employee training program. The position is an upgrade requiring additional skills and it involves new technology.

- 3) The employer must be eligible to be an OJT employer, having not exhibited a pattern of failing to provide OJT participants with continued long-term employment with wages, benefits, and working conditions that are equal to those provided to regular employees, doing the same type work for a similar period of time.
- 4) The OJT must relate to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the Local Idaho Works board.

Because the issues involved in contracting with an employer for an OJT with his/her employee are rather complex, the grants manager should be contacted with any questions or concerns.

FOLLOW-UP

Q. What services can I offer during the 12-month follow-up period?

- A. The Follow-Up TAG indicates that the emphasis is on counseling and guidance to assist an individual retain employment, increase earnings or complete education requirements when appropriate. Follow-up services that may be provided without re-registering the participant into WIA include all of the services described as core and intensive with the exceptions of work experience, internships and job shadowing. For the most part, these will be staff-assisted services rather than those requiring payment for supportive or basic skills services. In some cases, it may be appropriate to provide for supportive services or additional basic skills training, including a basic skills computer course in order to assist an individual who needs these services to attain or retain a job. For participants who lack basic education or computer skills, it

would be most appropriate to delay exit to attain those skills rather than exit them upon attaining employment to ensure their longer-term employability. In any event, services that entail on-going WIA payment support would require re-enrollment as would any occupational skills training.

Q. What do we do with people who refuse to respond to calls and letters, even though they were aware of the intensive followup requirements at the start?

A. WIA requires 12 months of followup services after exit from the program. Regardless of all staff efforts, there will be occasions where the client simply refuses to communicate with staff, or occasions where the client simply cannot be located. In these situations, staff should continue to attempt delivery of services, and document the success or failure in the case log.

PERFORMANCE MEASURES

Q. Credentials what are they and what are the timeframes? How do they affect partner agencies and post-secondary schools?

A. The Adult, Dislocated Worker and Older Youth programs have performance measures that involve measuring employment and educational credential attainment. For Adult and Dislocated Worker participants this measure applies only to those participants who are enrolled into training. The Older Youth credential attainment measure applies to all Older Youth participants. The Older Youth measure also allows for placement into post-secondary education or advanced training as well as employment. For all three measures the credential may be obtained during participation in services or by the end of the third quarter after exit. Due to reporting limitations, the JTPA exiters will not be included in these measures. These measures will only apply to WIA exiters.

Training services may be supported through non-WIA funded partner training services. The primary impact of the measure on partner agencies and post-secondary schools is an increase in the importance of issuing credentials for training programs.

Definitions for training services and credentials are listed below:

Training Services - include WIA-funded and non-WIA funded partner training services. These services include: occupational skills training, including training for nontraditional employment; on- the-job training; programs that combine workplace training with related instruction, which may include cooperative education programs; training programs operated by the private sector; skill upgrading and retraining; entrepreneurial training; adult education and literacy activities in combination with other training; and customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training. Training includes all training programs covered by WIA Individual Training Accounts. For Adult and Dislocated Worker participants, stand-alone basic

education, including basic computer skills, is considered Intensive services and is *not* included under this definition of training. Participants receiving those services must receive some additional training services to be included in this measure. If Adult and Dislocated Workers are enrolled in training, GED and certificates of completion of basic computer skills are acceptable. These outcomes are acceptable for all Older Youth participants.

Credential - nationally recognized degree or certificate or State/locally recognized credential. Credentials include, but are not limited to, a high school diploma, GED or other recognized equivalents, post-secondary degrees/certificates, recognized skill standards, and licensure or industry-recognized certificates. All Idaho State Board of Education recognized degrees and credentials are included. This includes "Certificate of Completion" for short-term non-credit programs. In addition, the Idaho Works Boards are encouraged to award local credentials recognizing the successful completion of on-the-job training. Please note for Older Youth participants, GED and certificates of completion for basic computer skills are acceptable certificates.

Q. Are there any differences between the Adult and Dislocated Worker performance measures?

A: Both the Adult and Dislocated Worker programs have four performance measures. While these measures are similar, there are some important differences. The Adult entered employment measure is limited to those participants who were unemployed at registration and excludes those participants who were employed at registration. The Dislocated Worker entered employment measure includes both groups. Also, the earnings measure is calculated differently for Adults and Dislocated Worker exiters. The Adult measure is an earning change measure, while the Dislocated Worker is an earnings replacement measure. The employment retention measure and the employment and credential measure is the same for both Adults and Dislocated Worker exiters.

Q. Can out of state wages be utilized in determining the employment, employment retention and earnings measures?

A. Supplemental reporting documentation of out of state wages is acceptable for the employment and employment retention measures. To ensure comparability for the earnings measures on a national level, however, USDOL requires that UI wage records be the only data source for these measures. That is, supplemental reporting from sources other than UI wage records for the earnings measure is not allowed. The State is in the process of exploring options for participating in a national wage records exchange system that is under development and/or entering into agreements with neighboring states for sharing UI wage record data.

Remember, for those measures where supplemental reporting is allowable, all data and methods to supplement wage record data must be documented and are subject to audit. A telephone response from the participant must be accompanied by a written document such as a W-2 form, pay stub, 1099 form, or other written documentation.

Telephone verification of employment with employers is acceptable, but must be documented by the case manager. For self-employed individuals, telephone verification with major clients/contracting entities is also acceptable, but must be documented.

Q. Are IBIQ screens an acceptable source for supplemental documentation?

- A. The Idaho Department of Labor's Unemployment Insurance program maintains IBIQ screens that allow for checking other States' wage records. Documentation of employment and employment retention through the use of the IBIQ screens is acceptable. A copy of the printed screen should be maintained in the documentation file. If **non**-Job Service providers are unable to obtain employment documentation for a participant and believe that individual is employed in another State, your grants management officer will respond to requests to search the IBIQ system for verification.

SUPPORTIVE SERVICES

Q. How do we keep out of trouble with this?

- A. Participant files should include documentation that supports any payment as reasonable and necessary for the individual to participate in an authorized activity. In addition, case managers should become familiar with the Supportive Service/Insurance TAG which includes information on the following:

- Bid Requirements
- Supportive Service Prohibitions
- Needs Related, Bonus, and Incentive Payments
- Supportive Service Cautions
- Out-of Area Job Search - Limitations and Restrictions
- Relocation – Limitations and Restrictions

In addition, Case Managers should contact their Grants Manager if unique situations or unusual payment requests occur

Q. What are some common problems and how do we avoid them?

- A. Documentation that supports the payment as reasonable and necessary is not included with the WIA-04.

*A participant is not active in the activity when the financial transaction occurs

*Vendor numbers are wrong or incomplete

Payments are authorized prior to a participant's enrollment

Payment forms are incomplete, lack signatures, or do not include original receipts, invoices, etc.

The bid process is not followed

*most common

MANAGEMENT INFORMATION SYSTEM

Q. When should we register the client so that core and intensive services are appropriately recorded on MIS?

Regulations state that an adult/dislocated worker must receive a core service before being considered for intensive services and must receive an intensive service before being considered for training services. The case manager must document delivery of those services in the case file and must also document in the case file the determination that each step up in level of services is necessary to reach self sufficiency. The MIS is not used to document the delivery of core services prior to delivery of intensive services, or delivery of intensive services prior to delivery of training services. Rather, entries in the MIS document basic eligibility, enrollment and specific information regarding participation in WIA activities as they occur.

Q. What if a paper application is taken in the rural areas with no internet access – what do we do?

A. When data-entering an enrollment in the MIS, you can backdate the application/determination date to correspond with the actual date you started the process. You can also backdate the enrollment/registration date. Note the screens where you can backdate the application/enrollment have messages typed in red, which point out the ability to backdate.

Q. Could we lengthen the time before the screens bump you out? When we are data entering, if we leave or get side tracked, the system takes us out and we have to start all over again. Lengthen the time!!

A. When the MIS has been left inactive for 20 minutes or more, the system forces re-entry of the Username and Password. **This is for security purposes.** Each WIA applicant or participant has the right, and the expectation, that their most personal information collected during the WIA registration process and throughout their program participation, is treated with the highest of standards in maintaining confidentiality. Though we realize this may be an inconvenience for the WIA representative, our customer's needs in this regard is paramount.

In addition to security, however, there is another reason why the system defaults to a 20-minute timeout, and that is to release server resources, which keeps things running fast.

Q. On WIA participant report wizard there is an option to show only participants updated by mharman or dbriggs etc. When marking this area the report that is generated is only new WIA participants who are in an activity (wording on screen states otherwise). It does not list participants updated by staff. Are we doing something wrong?

A. The WIA Participant Activity Report parameters allow as an option, the Username of the individual that last updated each activity a participant is/was enrolled in to show on the report. If mharman or dbriggs are the only two names indicated under the “Updated By” column on the Participant Activity Report, then it is likely that they were the only two persons who had updated the activities for the specific parameters that were chosen by the individual who ran the report. Individuals who were transitioned into WIA from JTPA and whose activities were not updated by anyone on or after July 1, 2000, will show “JTPA640” under the “Updated By” column of the Participant Activity Report. If you feel the report is in error, please contact your Grants Manager.

Q. What replaces the JMISC? I haven't looked at the state-produced obligation system – just our office. Will there be a statewide system? If so, when may it become available?

A. Assuming that rather than JMISC, the report referred to above is the JTPA's JMAC-66 report, WIA's “JMAC-66” equivalent may be found in the WIA MIS. At the main menu:

- Click on [Accounting/Payroll](#)
- Click on [WIA Financial Reports](#) from the menu on the right
- Enter the desired Program Year, WIB, and Site, then click on the Submit button
- Lastly, click on [Site Participant Obligation Register](#)

Q. When data entering a change on the MIS the message at the bottom does not change to entered data was successfully added- it continues to read-please complete form press submit. Confusing to staff-it appears that the change did not take and staff will try several times to update information.

A. When utilizing the change function in the WIA MIS, the system was designed to allow the User to be able to make and submit the changes as many times as was desired without having to leave and then return to the same screen.

Users are able to see that the time changes in the Update Date field (and the date will also change if different from when the last changes were made) immediately after the Submit button is depressed. If an error is detected by the system, a message will be displayed to the User, otherwise, when the time changes in the Update Date field the User can be assured that the changes were made successfully.