

WIOA TITLE I YOUTH POLICY GUIDE



EFFECTIVE DATE:

DECEMBER 20, 2023

PARTNER4WORK PITTSBURGH, PA

Contents

OVERVIEW	3
PARTNER4WORK	3
WIOA BACKGROUND	3
WIOA YOUTH	4
PURPOSE OF GUIDE	4
AUDIENCE/ RESPONSIBLE PARTIES	4
WIOA YOUTH ELIGIBILITY	4
ADDITIONAL ELIGIBILITY REQUIREMENTS FOR IN-SCHOOL YOUTH (ISY).....	5
ADDITIONAL ELIGIBILITY REQUIREMENTS FOR OUT-OF-SCHOOL YOUTH (OSY).....	5
SELECTIVE SERVICE REQUIREMENTS	6
PRIMARY ELIGIBILITY REVIEW	6
SELF CERTIFICATION	6
WIOA YOUTH SERVICES.....	9
SUPPORTIVE SERVICES.....	12
SUPPORTIVE SERVICE REQUIREMENTS	12
WIOA SUPPORTIVE SERVICE AVAILABILITY.....	12
YOUTH PAYMENTS	14
GENERAL REQUIREMENTS.....	14
INCENTIVE REQUIREMENTS	15
STIPEND REQUIREMENTS	16
YOUTH WORK EXPERIENCE.....	17
ELIGIBILITY	17
PROCEDURES.....	17
FOLLOW-UP SERVICES	18
POLICY EXCEPTIONS.....	19
PROGRAM/PROVIDER PERFORMANCE	19
DATA ENTRY & CASE MANAGEMENT	19
DOCUMENTATION REQUESTS	19
CASE NOTES AND SERVICE CODES	19
PERFORMANCE MEASURES.....	20

PERSONALLY IDENTIFIABLE INFORMATION	21
KEY TERMS	21
REQUIREMENTS.....	22
COMPLAINT & GRIEVANCE POLICY.....	23
BACKGROUND	23
PROCEDURE.....	24
GLOSSARY OF TERMS.....	25
REFERENCES	30
ELIGIBILITY	30
WIOA YOUTH PROGRAM ELEMENTS.....	30
SUPPORTIVE SERVICES	30
INCENTIVES.....	30
STIPENDS	31
YOUTH WORK EXPERIENCE	31
FOLLOW-UP SERVICES	31
PERSONALLY IDENTIFIABLE INFORMATION	31
COMPLAINT & GRIEVANCE POLICY	31
POLICY UPDATES	32
FORMS:	
SELF-CERTIFICATION FORM.....	APPENDIX A
WIOA TELEPHONE VERIFICATION/DOCUMENT INSPECTION.....	APPENDIX B
WIOA STATEMENT OF FAMILY SIZE/FAMILY INCOME	APPENDIX C
POLICY EXCEPTION FORM	APPENDIX D
COMPLAINT & GRIEVANCE FORM.....	APPENDIX E
WIOA IN-SCHOOL YOUTH (ISY) ELIGIBILITY DOCUMENTATION	APPENDIX F
WIOA OUT-OF-SCHOOL (OSY) YOUTH ELIGIBILITY DOCUMENTATION	APPENDIX G

OVERVIEW

PARTNER4WORK

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

Our Vision

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

Mission

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

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

WIOA BACKGROUND

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

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

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

WIOA YOUTH

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

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

PURPOSE OF GUIDE

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

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;

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

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

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

PRIMARY ELIGIBILITY REVIEW

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

- **Verification** means to confirm eligibility requirements through examination of documents (e.g., birth certificates or public assistance records) or speaking with representatives of authorized agencies.
- **Documentation** means to maintain 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 CERTIFICATION

Self-certification is allowed as a viable source for documenting certain eligibility criteria for WIOA Youth program participants. For ISY, the use of self-certification must be limited and only available as a last resort after all other sources of eligibility verification/documentation are exhausted. To ease burdens on both

applicants and providers and serve out-of-school youth who are most in need, the use of self-certification is permitted for OSY eligibility determination and is **not required** to be limited or used as a last resort.

Rare Circumstances (ISY only)

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 WIOA OSY and ISY participants for documenting the eligibility criteria listed below. Self-certification is not an allowable documentation source for any eligibility criteria other than the criteria listed below. All other applicable requirements of this policy, including limited use of self-certification for ISY, must also be met.

- English language learner
- Homeless
- In/Aged out of the foster care system
- Offender
- Pregnant or parenting
- Requires additional assistance
- Runaway
- School status at time of registration

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.

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

Self-certification is among the least preferred methods of documenting and verifying eligibility for WIOA Youth participants. 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. While self-certification is not required to be limited or used as a last resort for OSY eligibility determination, service providers must still provide a case note describing the reasoning/need for using self-certification for an OSY 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.

WIOA YOUTH SERVICES

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

WIOA PROGRAM ELEMENT	DESCRIPTION
1. Tutoring, study skills training, and instruction leading to the completion of secondary school, including dropout prevention strategies;	These services focus on academic support, assisting with learning obstacles, and can be provided one-on-one, in a group setting, or through resources and workshops.
2. Alternative secondary school services or dropout recovery, as appropriate;	“Dropout recovery” refers to services attempting to reengage students, who may have dropped out, through credit recovery, counselling, and educational plan development.
3. Paid and unpaid work experience that links academic and occupational education, employment opportunities, pre-apprenticeship programs, internships and job shadowing, and on the job training;	Work experiences are a planned, structured learning experience that takes place in a workplace for a limited period. Work experience may be paid or unpaid, and may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship exists, as defined by the Fair Labor Standards Act or applicable State law.
4. Occupational skills training,* as appropriate; particularly training that leads to industry recognized credentials aligned with in-demand industry sectors;	<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"> (1) Be outcome-oriented and focused on an occupational goal specified in the individual service strategy; (2) Be of sufficient duration to impart the skills needed to meet the occupational goal; and (3) Lead to the attainment of a recognized postsecondary credential. <p>*When youth are enrolled in academic or occupational skills training in WIOA programs, they must be assisted in earning an industry</p>

	<u>recognized credential</u> and demonstrating a measurable skill gain.
5. Education* offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;	<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 <u>industry recognized credential</u> and demonstrating a measurable skill gain.</p>
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"> (a) Exposure to postsecondary educational possibilities; (b) Community and service learning projects; (c) Peer-centered activities, including peer mentoring and tutoring; (d) Organizational and team work training, including team leadership training; (e) Training in decision-making, including determining priorities and problem solving; (f) Citizenship training, including life skills training such as parenting and work behavior training; (g) Civic engagement activities which promote the quality of life in a community; and (h) Other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee. <p>(CFR § 681.520)</p>
7. Supportive services	<p>The term "<u>Supportive Services</u>" means services such as transportation, clothing and/or uniforms, equipment/tools, drug testing, and reasonable accommodations for individuals with disabilities, that are necessary to enable an individual to participate in activities authorized under WIOA. Supportive services are also able to be provided and expenses incurred for youth in follow up.</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><u>Follow-up services</u> 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>
<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 <u>participants</u>. 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>
<p>12. Entrepreneurial skills training;</p>	<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</p>

	identifying business opportunities and 3) Developing budgets.
13. Services that provide labor market information, such as career awareness, counseling, and exploration;	"Labor market information" includes the identification and/or analysis of topics such as employment, unemployment, local employment dynamics, and occupational projections.
14. Activities that help youth prepare for and transition to post-secondary education and training.	"Preparing for post-secondary education and training" may include SAT/ACT test preparation, exploring education options including technical training schools and community colleges, or providing support with financial aid applications.

SUPPORTIVE SERVICES

Supportive Services are intended to enable individuals to participate in WIOA activities. This section ensures appropriate and necessary supportive services to assist program participants are available in full compliance with WIOA 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 Port Authority of Allegheny County's monthly fare;
 - b. Gas cards, not exceeding \$60 per week;
 - 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 Port Authority of Allegheny County 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) **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.
- 3) **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.
- 4) **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.
- 5) **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.
- 6) **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.

- 7) **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.
- 8) **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.
- 9) **Reasonable accommodations for individuals with disabilities** —WIOA supportive services dollars may only be used as the funding of last resort for these accommodations.

YOUTH PAYMENTS

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

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

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.

GENERAL REQUIREMENTS

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

to issuing incentives or stipends for a program. Incentives and stipends must also be approved and budgeted for during the contracting process.

INCENTIVE REQUIREMENTS

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

The following are the eligibility requirements for providing incentive payments:

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

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

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

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

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

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

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

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

STIPEND REQUIREMENTS

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 stipends must maintain a written stipends policy that outlines a uniform and consistent strategy for issuing stipend payments to program participants. Providers **must submit this policy** to Partner4Work for approval prior to issuing stipends for a program. Stipends must also be approved and budgeted for during the contracting process.

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. Unlike a wage, stipends should **not** be based on an hourly rate. Providers are responsible for documenting participation/attendance in the activity as the basis of stipend payments.

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

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

YOUTH WORK EXPERIENCE

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

ELIGIBILITY

Participant Eligibility

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

General Work Experience Employer Eligibility

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

Paid Work Experience Employer Eligibility

The provider organization with which the youth is enrolled serves as the employer of record and is responsible for ensuring that wages are paid on time and in full. Non-profit, for-profit, and public entities are eligible to serve as paid work experience sites. A company will not be eligible to host a youth participant for work experience if:

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

PROCEDURES

Providers must spend at least 25% of WIOA youth funding on paid or unpaid work experience, which may include administrative costs, such as 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.
- 7) 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.

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

Individuals or entities seeking to request an exception must complete the **Policy Exception Form** which is attached to this manual. Exception requests are to be sent to policy@partner4work.org

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 Youth providers 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 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 the time frame requested.

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
Programmatic Retention The percentage of participants who start and complete the program.	90%
Measurable Skills Gain The percentage of program participants who, during a program year , are in an education or training program that leads to a recognized postsecondary credential or employment and who have achieved a measurable skills gain toward such a credential or employment. <u>Note:</u> Participants enrolled in a program in multiple program years must demonstrate a measurable skill gain <u>each program year</u> .	85%
Obtainment of a Degree or Certificate The percentage of participants who have attained a diploma, a high school equivalency, or industry recognized credential within one year after exit from the program. In the case of individuals who obtain a high school diploma or its recognized equivalent, the individual must also have obtained or retained employment or must be enrolled in an education or training program leading to a recognized postsecondary credential within one year after program exit.	85%
Placement upon Exit The percentage of participants who are employed (including the military) or enrolled in post-secondary education and/or advanced training/occupational skills training at program exit	85%
Employment (2nd Quarter after exit) The percentage of participants who are employed (including the military) or enrolled in post-secondary education and/or advanced training/occupational skills training during the 2nd quarter after the exit quarter.	75%
Employment (4th Quarter after exit)	65%

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.	
Median Earnings Median earnings of participants who are in unsubsidized employment during the 2nd quarter after program exit.	\$3,500
Referrals for Adult Career Services Percent of participants referred to PA CareerLink® core partners for services. Referral goal may be met by referring any adult for whom adult services would be suitable, not just those that are enrolled in youth programming.	20%
Co-Enrollment in Adult Career Services Percent of participants co-enrolled via PA CareerLink for access to additional training services	Baseline
Exposure to Priority Industries: Percent of participants whose work experiences or credentials align with one of the following industries: healthcare, technology, financial services, construction, or manufacturing	Baseline
Employer Engagement The percentage of employer partners that engage directly with youth through providing opportunities for work experiences, career exploration or employment opportunities	Baseline

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, internal hard drives, or cloud drives must be encrypted. All PII stored onsite and electronically must have limited access, 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. 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 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. This form must be mailed or emailed to the following:

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

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

Step 2: Opportunity for an Informal Resolution

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

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

Step 3: Opportunity for a Hearing

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

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

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

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

Step 4: Commonwealth Grievance and Hearing Procedures

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

Information Requirements

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**.

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

Public Schools	Non-Public Schools
<ul style="list-style-type: none"> • School districts • Charter schools • Cyber charter schools 	<ul style="list-style-type: none"> • Sectarian schools • Private schools

<ul style="list-style-type: none"> • Area vocational technical schools (AVTS) 	
Post-Secondary Institutions (Public or Private)	
<ul style="list-style-type: none"> • Community college • 2-year college • College • University • Authorized degree granting institution (Pennsylvania Dept. of Education) 	

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

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

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

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

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

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

INCENTIVES: Incentive payments are awarded to participants in recognition of a measurable achievement directly tied to training activities or work experiences. Incentive payments differ from stipends, as they

must be awarded in response to a specific outcome achieved (e.g. credential attainment, job placement, placement in post-secondary education) rather than program participation/attendance.

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

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

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

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

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

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 criteria below:

- 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.
- Historically Disenfranchised and Marginalized

- Is an individual who has experienced discrimination based on race, color, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, disability, or genetic information (including family medical history);
- Is a migrant Youth or an individual determined eligible for Deferred Action for Childhood Arrivals (DACA) Program; or
- Labor market information indicates there is an underrepresentation of the participant's race, national origin, gender identity, or sexual orientation within their industry of choice in Allegheny County or the Pittsburgh Metropolitan Statistical Area (MSA).
- 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 , other than (or in addition to) income-based services, from a PA Department of Human Services (PA DHS) or Allegheny County Department of Human Services (ACDHS) program; **or**
 - Has been referred to, or is being treated by, an agency for a substance abuse related issue.

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.

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.

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](#)

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

Supportive Services:

Date	Update
12/15/2023	<ul style="list-style-type: none"><li data-bbox="386 346 1567 415">• Revised language to clarify when a supportive service can be determined to be “necessary to enable participation in WIOA career services or training”.<li data-bbox="386 457 1567 527">• Revised language to clarify how providers may determine that a supportive service is unavailable through resources outside of WIOA funding.<li data-bbox="386 569 1230 600">• Removed references to the Near Completers Demonstration Grant.<li data-bbox="386 642 1485 669">• Updated Policy Exceptions section to direct reviewers to the P4W Policy Exception Form.

**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 _____



Policy Exception Request Form

Exception requests will be reviewed based on their allowability under WIOA and any other applicable legislation, regulation, and policy/guidance. Partner 4Work will also consider funding availability, how an exception will lead to improved outcomes for the customer(s) being served, and other relevant factors.

Please submit all applicable information:

Name of Participant or Business (for which an exception is requested): _____

Participant ID or Business FEIN: _____ Date of Filing (MM/DD/YYYY): _____

Service Provider Name: _____ Case Manager: _____

Provider Phone Number: _____ Provider Email: _____

Participant-Level Exception Program-Level Exception Exception Sunset Date _____

The Policy for which an exception is being requested:

- | | | |
|---|---|---|
| <input type="checkbox"/> Customized Job Training Policy | <input type="checkbox"/> On-the-Job Training Policy | <input type="checkbox"/> Youth Incentive Policy |
| <input type="checkbox"/> Follow-Up Services Policy | <input type="checkbox"/> Stipend Policy | <input type="checkbox"/> Youth Work Experience Policy |
| <input type="checkbox"/> Incumbent Worker Training Policy | <input type="checkbox"/> Supportive Services Policy | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Individual Training Account Policy | <input type="checkbox"/> Transitional Jobs Policy | |

Specific policy requirement for which an exception is requested:

Describe the reason and/or need for the exception:

Signature:

Requesting Party (Printed name)

(Signature)

Date (MM/DD/YYYY)

Partner4Work (Printed name)

(Signature)

Date (MM/DD/YYYY)

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

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 or 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