

LOCAL

POLICIES

AND

PROCEDURES

REGION 5

WV

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To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 1

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015: **MODIFICATION DATE(S)**: December 28, 2015, July, 2016, July 1, 2017;
July 1, 2018, May 16, 2019, July 1, 2019, July 1,
2020; July 1, 2021; July 1, 2022; **JULY 1, 2023**

Subject: Revised Lower Living Standard Levels Policy for Region 5 as per the Workforce WV Office

70% LOWER LIVING STANDARD INCOME LEVELS (ie: For Youth)

<u>FAMILY SIZE</u>	<u>NON-METROPOLITAN</u>	<u>METROPOLITAN</u>
1	\$14,580	\$14,580
2	19,720	19,720
3	24,860	24,860
4	30,000	30,296
5	35,140	35,756
6	40,686	41,819

**Brooke, Hancock, Ohio and Marshall counties are metropolitan. Wetzel and Tyler counties are non-metropolitan.

PROGRAM YEAR 2023 200% LOWER LIVING STANDARD WAGES FOR REGION
(Use For Self-Sufficiency Employment)

<u>FAMILY SIZE</u>	<u>NON-METROPOLITAN</u>	<u>METROPOLITAN</u>
1	\$30,348	\$31,176
2	49,714	51,082
3	68,234	70,112
4	84,232	86,560
5	99,402	102,162
6	116,246	119,484

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 2

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: Transitioning (“Grandfathering”) of Participants

On July 1, 2015 all WIA Title I participants (including Adults, Dislocated Workers Youth participants) who were enrolled in a WIA Title I program prior to July 1, 2015 must be transitioned (or “grandfathered”) into WIOA even if the participant would not otherwise be eligible for WIOA. It is not necessary to complete an eligibility redetermination for a participant already determined eligible and enrolled under WIA. Furthermore, these participants must be allowed to complete the WIA services (“grandfathered” services) specified in their individual service strategy and/or individual employment plan, regardless of whether the services are allowable under WIOA or not, as long as the WIA services were specified in participants’ individual service strategy and/or individual employment plans as of June 30, 2015. You must continue to serve participants enrolled under WIA by providing the services for which WIA funds were already obligated. Effective, July 1, 2015, it is necessary that all new eligibility determinations be completed within the WIOA framework for participants enrolling on or after that date and must follow all WIOA requirements. Participants enrolled on or after July 1, 2015 may only access services allowable under the WIOA.

All WIA NEG participants enrolled at that time must be grandfathered in to the Dislocated Worker Grant (DWG) Program under WIOA. It is not necessary to complete eligibility redetermination for participants already determined eligible and enrolled under WIOA. “Grandfathered” participants must be allowed to complete WIA services either with WIA PY 13 and 14 carry-in funds that become WIOA funds or with WIOA funds. Services authorized under WIOA become available July 1, 2015 to new and existing participants. On or after July 1, 2015, it will be necessary to determine eligibility for new DWG participants under the WIOA framework.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 3

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: Framework for local Youth Programs

The design framework for local youth programs must:

- A. Provide for an objective assessment of each youth participant that meets the requirements of WIOA Section 129 (c)(1)(A) and includes a review of the academic and occupational skill levels, as well as the service needs, of each youth for the purpose of identifying appropriate services and career pathways for participants and informing the individual service strategy;
- B. Develop, and update as needed, an individual service strategy for each youth participant that is directly linked to one or more indicators of performance as described in “WIOA Section 116 (b)(2)(A)(ii), that identifies appropriate career pathways that include education and employment goals, that considers career planning and the results of the objective assessment and that prescribes achievement objectives and services for the youth participant; and
- C. Provides case management services for youth participant, including follow-up services.

Local programs must ensure appropriate links to entities that will foster the participation of eligible area youth. Links must include: Local area justice and law enforcement officials; Local public housing authorities; Local education agencies; Local human service agencies; WIOA Title II adult education providers; Local disability service agencies and providers and health and mental health providers; Job Corps; and, Other area youth entities.

Youth participants are to be provided with information about the full array of applicable or appropriate services available. Youth participants are to be referred to appropriate training and educational programs that have the capacity to serve them either on a sequential or concurrent basis.

Local youth programs must provide service to a participant for the amount of time necessary to ensure successful preparation to enter post-secondary education and/or unsubsidized employment. While there is no minimum or maximum time a youth can participate in a WIOA youth program (Unless the youth “ages out”), programs must link participation to the individual service strategy and not the timing of the provider’s contract or program years.

If a youth applies for enrollment in a program of workforce investment activities and either does not meet the enrollment requirement for that program or cannot be served by that program, the provider must ensure that the youth is referred for further assessment, if necessary or referred to the appropriate program that meet the skills and training needs of the youth.

In order to meet the basic skills and training needs of youth applicants who do not meet the eligibility requirements of a particular program or who cannot be served by the program, the provider must ensure that these youth are referred for further assessment, as necessary, and to appropriate programs.

An objective assessment and the individual service strategy is not required if the provider determines that it is appropriate to use a recent objective assessment or individual service strategy that was developed under another education or training program.

Parents, youth participants and other members of the community with experience relating to youth programs should be actively involved in the design and implementation of local youth programs.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 4

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: Youth Participation in Concurrent Programs

Youth who meet the respective program eligibility requirements may participate in an adult and youth program concurrently. Such individuals must be eligible under the youth or adult eligibility criteria applicable to the services received. The provider may determine for these individuals the appropriate levels and balance of services under the youth and adult programs. With assistance from the provider, the NPWDB must identify and track the funding streams which pay the costs of services provided to individuals who are participating in youth and adult programs concurrently and ensure no duplication of services. Individuals who meet the respective program eligibility requirements for WIOA youth Title I and Title II funding may participate in youth Title I and Title II funding concurrently.

The provider should determine the appropriate programs for the participant based on the service needs of the participant and if the participant is career-ready based on an objective assessment of their occupational skills, prior work experience, employability and participant needs.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 5

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Modified Date: November 24, 2015

Subject: WIOA Eligibility Requirements for Out-of-School and In-School Youth

Out-of-School Youth

- A. Ages 16 -24 at the time of enrollment and not attending any school as defined under State law.
- B. Fall within one (1) or more of the following categories:
 - 1. A School Dropout which is to be verified at the time of WIOA youth program enrollment. A youth attending an alternative school at the time of enrollment is not a dropout (The definition of an alternative school is defined by State law). An individual who is out-of-school at the time of enrollment and subsequently placed in an alternative school or any school, is considered an out-of-school youth for the purposes of the 80% expenditure requirement for out-of-school youth; 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. School calendar quarter is based on how a local school district defines its school year quarters;
 - 2. A recipient of a secondary school diploma or its recognized equivalent who is low income and is either is basic skills deficient or an English language learner;
 - 3. An individual who is subject to the juvenile or adult justice system;
 - 4. A Homeless individual as defined in Section 41403 (6) of the Violence Against Women Act of 1994, a homeless child or youth as defined in Section 725 (2) of the McKinney-Vento Homeless Assistance Act, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under Section 477 of the Social Security Act or in an out-of-home placement.
 - 5. An individual who is pregnant or parenting;
 - 6. An individual with a disability; or,
 - 7. A low income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

Eligibility documentation requirements for the “Requires additional assistance to enter or complete an educational program or to secure or hold employment” criterion are: individual service strategy, individual employment plan, case notes, intake application, AJC registration form, MACC IEP, applicant statement. These documents must indicate a barrier other than an eligibility requirement barrier.

For out-of-school youth, only those youth who are the recipients of a secondary school diploma or its recognized equivalent and are either basic skills deficient or an English language learner and youth who require additional assistance to enter or complete an educational program or to secure or hold

employment must be low income. All other out-of-school youth meeting out-of-school eligibility are not required to be low income.

In-School Youth

- A. Attending school as defined by State law including secondary and post-secondary school;
- B. Not younger than age 14 (unless it is an individual with a disability who is attending school under State law) and not older than age 21 at the time of enrollment;
- C. A low income individual and is one (1) or more of the following:
 - 1. Basic skills deficient.
 - 2. An English language learner.
 - 3. An offender.
 - 4. A Homeless individual as defined in Section 41403 (6) of the Violence Against Women Act of 1994, a homeless child or youth as defined in Section 725 (2) of the McKinney-Vento Homeless Assistance Act, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under Section 477 of the Social Security Act or in an out-of-home placement.
 - 5. An individual who is pregnant or parenting.
 - 6. An individual with a disability.
 - 7. An individual who requires additional assistance to complete an educational program or to secure or hold employment.

All in-school youth must be low income to meet the in-school youth eligibility criteria except those that fall under the low income exception. In addition to the criteria in the definition of “low income individual,” a youth is considered low income if he/she received or is eligible to receive a free or reduced priced lunch under the Richard B., Russell National School Lunch Act or if he/she lives in a high poverty area.

A youth who lives in a high poverty area is automatically considered to be a low income individual. A high poverty area is a Census tract, a set of contiguous Census tracts, Indian Reservation, tribal land or Native Alaskan Village or county that has a poverty rate of at least 30% as set every 5 years using the American Community Survey 5 year data.

For an individual with a disability income level for eligibility purposes is based on the individual’s own income rather than his/her family’s income.

A youth is basic skills deficient if he/she: Has English, reading, writing or computing skills at or below the 8th grade level on a general accepted standardized test or; Are 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. In assessing basic skills, local programs must use assessment instrument that are valid and appropriate for the targeted population and must provide reasonable accommodations in the assessment process, if necessary, for youth with disabilities.

Eligibility documentation requirements for the “Requires additional assistance to complete an educational program or to secure or hold employment” criterion are: individual service strategy, individual employment plan, case notes, intake application, AJC registration form, MACC IEP, applicant statement. These documents must indicate a barrier other than an eligibility requirement barrier. Not more than five percent (5%) of In-School Youth enrolled in the program year are eligible only based on the “Additional Assistance” criterion.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 6

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: WIOA Youth Program Elements (14)

In order to support the attainment of a secondary school diploma or its recognized equivalent, entry into post-secondary education and career readiness for participants, youth programs shall provide elements consisting of:

1. Tutoring skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to the completion of the requirement of a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized post-secondary credential;
2. Alternative secondary school services or dropout recovery services, as appropriate;
3. Paid and unpaid work experiences that have as a component academic and occupation education which may include: summer employment opportunities and other employment opportunities available throughout the school year; pre-apprenticeship programs; internships and job shadowing; and, on-the-job training opportunities. (A pre-apprenticeship is a program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship program and has a documented partnership with at least one, or more, registered apprenticeship programs);
4. Occupational skill training which shall include priority consideration for training programs that lead to recognized post-secondary credentials that are aligned with in-demand industry sectors or occupations in the local area. This training must be outcome-oriented and focused on an occupational goal specified in the individual service strategy, be of sufficient duration to impart the skills needed to meet the occupational goal and result in the attainment of a recognized post-secondary credential. The chosen occupational skills training must meet the quality standards in WIOA Section 123 ;
5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster. This element reflects the integrated education and training model and requires integrated education and training to occur concurrently and contextually with workforce preparation activities and workforce training. Workforce preparation activities, basic academic skills and hands-on occupational skills training are taught within the same timeframe;
6. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, exposure to post-secondary educational possibilities, organizational and team work including team leadership training, training in decision-making including determining priorities and problem solving, citizenship training including life skills training such as parenting and work

behavior training, as appropriate; (Positive social and civic behaviors may include positive attitudinal development; self-esteem building, openness to work with individuals from diverse backgrounds; maintaining healthy lifestyles including being alcohol and drug free; maintaining positive social relationships with responsible adults and peers; maintaining a commitment to learning and academic success; avoiding delinquency; postponing parenting and responsible parenting including child support education; positive job attitudes and work skills; keeping informed in community affairs and current events);

7. Supportive Services. These services include, but are not limited to, linkages to community services, assistance with transportation, assistance with child care and dependent care, assistance with housing, assistance with educational testing, reasonable accommodations for youth with disabilities, referral to health care and assistance with uniforms or other appropriate work attire and work related tools including such items as eye glasses and protective eye gear;
8. Adult mentoring. Adult mentoring for youth must: Last at least 12 months and may take place both during the program and following exit from the program; 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; Include a mentor who is an adult other than the assigned youth Case Manager; and, While group mentoring activities and mentoring through electronic means are allowable, at a minimum, youth programs must match the youth with an individual mentor whom the youth interacts on a face-to-face basis. Mentoring may include workplace mentoring when the youth program matches a youth participant with an employer or an employee of a company;
9. Follow-up Services for no less than twelve (12) months after completion of participation. All youth participants must receive some form of follow-up services. The type and intensity of follow-up services (Section 681.580 of the WIOA) may differ for each participant. However, follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome.
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, career and academic counseling, mental health counseling and referral to partner programs as appropriate. When referring participants to necessary counseling that cannot be provided by the youth program or its service provider(s), the youth program must coordinate with the organization it refers to in order to ensure continuity of services;
11. Financial Literacy Education, including supporting the ability of participants to create household budgets, initiate savings plans and make informed financial decisions about education, retirement, home ownership, wealth building or other savings goals, supporting the ability to manage spending, credit and debt, including credit card debt, effectively increasing awareness of the availability and significance of credit reports and credit scores in obtaining credit including determining their accuracy (and how to correct inaccuracies in the reports and records and their effect on credit terms), supporting the ability to understand, evaluate, and compare financial products, services and opportunities and supporting activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials;
12. Entrepreneurial Skills Training. This training provides the basics of starting and operating a small business This training develops skills like: taking initiative, creatively seeking out and identifying business opportunities, developing budgets and forecasting resources, understanding various options for acquiring capital and the trade-offs associated with each option, communicating effectively and marketing ones own ideas. Approaches to teach youth entrepreneurial skills include, but are not limited to:., entrepreneurial education that provides an introduction to the values and basics of starting and running a business, guiding youth through the development of a business plan. Enterprise development provides support and services that incubate and help youth develop their own businesses, help them access small loans or grants that are needed to begin business operations and by providing more

individualized attention in the development of viable business ideas. Experiential programs provide youth with experience in the day-to-day operations of business. These programs may involve the development of a youth-run business that young people participate in, work and manage or they may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community;

13. 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; and,
14. Activities that help youth prepare for and transition to post-secondary education and training.

The youth program is not required to use WIOA youth funds for each of the program elements. The youth program may leverage partner resources to provide some of the readily available program elements. However, the youth program must ensure that if a program element is not funded with WIOA Title I youth funds, the youth program has an agreement in place with a partner organization to ensure that the program element(s) will be offered. The program elements must be closely connected and coordinated with the youth program.

Local Programs have the discretion to determine what specific program services will be provided to a youth participant based on each participant's objective assessment and individual service strategy. Local programs are not required to provide every program service to each participant.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 7

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: Youth Work Experience Program

Local youth programs must expend not less than 20% of the WIOA funds allocated to them to provide in-school and out-of-school youth with paid and unpaid work experience.

Work experiences are planned structured learning experiences that take place in a workplace for a limited period of time. Work experiences may be paid or unpaid, as appropriate. A work experience 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. Work experiences provide the youth participant with opportunities for career exploration and skill development. Summer employment opportunities are a component of the work experience program element. A youth provider administering the work experience program element must be selected by the NPWDB by awarding a contract on a competitive basis. However, the summer employment administrator does not need to select the employers who are providing the employment opportunities through a competitive process.

Work experiences must include academic and occupational education. Types of work experiences include the following categories: Summer employment opportunities and other employment opportunities available throughout the school year; Pre-apprenticeship programs; Internships and job shadowing; and, On-the-job training opportunities.

Local youth program must track program funds spent on paid and unpaid work experiences, including wages and staff costs for the development and management of work experiences and report such expenditures to the NPWDB, Inc. in the monthly and close-out reports. The percentage of funds spent on work experience is calculated based on the total local area youth funds expended for work experiences rather than calculated separately for in-school and out-of-school youth. Administrative costs are not subject to the 20% minimum work experience expenditure requirements.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 8

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: Incentive Payments for Youth

Incentive payments to youth participants are allowable for recognition and achievement directly tied to training activities and work experience.

The youth program must detail, in writing to the NPWDB, Inc., the type(s), amount(s), etc. of incentive awards they are proposing to provide to WIOA youth participants. Incentive awards are contingent upon written, prior approval from the NPWDB.

When determining if incentive awards will be provided to youth participants, the NPWDB Inc. will take into account availability of WIOA youth funding and the reasonableness/necessity of proposed incentive awards. The youth program will be required to remain within their line item budget(s) for incentive awards as per the contractual agreement. If the NPWDB wants to provide incentive awards to youth participants during their participation in a NPWDB sponsored project, the same procedures will be adhered to with the NPWDB Board of Directors giving approval prior to incentive awards being provided to youth participants.

An incentive award must be tied to the goals of the specific program aligned with the local youth programs organizational policies as identified in the Individual Service Strategy (ISS). All achievements reached, etc. are to be maintained in the youth participant's file. To qualify for an incentive award, a youth participant must not possess his/her high school diploma or its equivalent or a post-secondary certificate at the time of WIOA registration.

Incentive awards are to be provided to youth participants in a uniform, fair and equitable manner. That is, incentive awards must be of the same value for all youth participants performing the same activity/achieving the same goal/objective, etc.

For incentive awards, youth participants may earn up to a total of four (4) of the following targeted activities/goals/objectives, which can be given at any time during the duration of the program with hard copy supporting documentation:

- Attainment of a Goal Set (Basic Skills, Work Readiness).
- Completion of a High School Diploma/GED.
- Completion of Vocational-Technical Training.

- Attainment of Employment.
- Retention of Job for at least Two (2) Months.
- Attainment of no less than thirty-six (36) hours of Program Curriculum.
It is recommended that no less than 12 hours of Program Curriculum be attained through a locally offered Job Readiness Workshop/Program/Course (ie: Work Readiness Workshop, etc.). Documentation detailing/showing dates and hours attended by youth, including the Instructor's signature, is required.
- Completion of Occupational Skills Certificate/Credentials (Hours may vary depending upon curriculum/hands-on training activity, etc.).
- Six (6) months of continued employment for youth participants who are employed prior to entering into a program activity(ies).
- Successful completion of no less than 50% of any post-secondary education training program pertaining to long-term training (ie: two year programs).

The youth participant's ISS must specify the goal(s) that must be met in order to qualify for an incentive award(s).

Incentive Awards to youth participants can be in the form of vouchers (ie: for interview job attire, work tools, etc.), gift cards, certificates, cash payments, etc. The maximum value of an incentive award that is a cash payment etc. to a youth participant may not exceed \$450 total during a program year. Incentive awards in the form of cash payments must be provided directly to the youth participant via check form only. Incentive awards in the form of vouchers (ie: for interview job attire, work tools, etc.), gift cards, certificates, etc. may not exceed \$150 total during a program year, must be written in the youth participant's name and be provided directly to the youth participant. Cash payments, gift cards, certificates, etc. (either donated or purchased with WIOA Youth funds) are to be kept by the youth program in a fireproof, locked safe at all times. The WIOA Youth Participant Incentive Award Record Log Form and the Incentive Award Tracking Form, must be completed, signed as appropriate and maintained in the proper file(s) for each youth participant who receives an incentive award in the form of a cash payment. The youth program must ensure the proper completion of the attached Record Log Form for each youth participant who receives an incentive award in the form of a gift card, certificate, etc. Gift cards, certificates, etc. shall not be retained for a period longer than ninety (90) days. And, only assigned staff (i.e. the youth program, Executive Director, Assistant Director) shall have access to these gift cards, certificates, etc.

Proper supporting documentation of any and all type(s) of incentive awards, in particular, cash payments, provided must be maintained in the youth participant's file. This supporting documentation will be monitored by the NPWDB, Inc. during regular monitoring visits/reviews.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 9

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: Policy on Failed Contracts for Region 5

POLICY FOR JOB CENTER OPERATOR

The Job Center Operator must achieve at least eighty percent (80%) and/or exceed the approved local performance standards at the end of each program year. Should the Job Center Operator not meet and/or exceed the local performance standards at the end of this period, a “failed contract” will result. The Job Center Operator will be responsible for allocating year-to-date costs to the appropriate WIOA categories: Program Activity, Support Services, etc.

A Job Center Operator who has a “Failed Contract” during or at the end of a program year will be ineligible to receive any future funding from the NPWDB, Inc. for a period of no less than three (3) years.

Should the Job Center Operator wish to appeal this policy, it may do so, in writing, to the NPWDB, Inc.’s One Stop Committee.

POLICY FOR TRAINING PROVIDERS

The Contractor must achieve at least eighty-five percent (85%) of all local performance standards that apply to the offered program(s) and/or service(s) at the end of the program year. A Contractor will have met performance indicators if its performance on any unmet standards meets or exceeds the statewide average performance for those standards. Should a Contractor not achieve at least eighty-five percent (85%) of all of the above WIOA standards that apply to offered program(s) and/or service(s) at the end of the program year, the Contractor’s program(s) and/or service(s) will be placed on probationary status during the second year of program operations. Should the Contractor not meet at least eighty-five percent (85%) of all of the above WIOA standards during its second year of operation, the Contractor’s program(s) and/or service(s) will be considered a “Failed Contract” and be terminated.

The Contractor will allocate year-to-date costs to the appropriate WIOA categories: Program Activity, Support Services, etc. when it has been determined a “Failed Contract” exists.

A Contractor who has a “Failed Contract” during or at the end of a program year will be ineligible to receive any future funding from the NPWDB, Inc. for a period of no less than (3) three years.

Should the Contractor wish to appeal this policy, it may do so, in writing, to the NPWDB, Inc.'s One Stop Committee.

POLICY FOR POTENTIAL CONTRACTORS

Every one (1) or two (2) program years, the NPWDB, Inc. may solicit potential Contractors, via a public RFP solicitation process, to deliver its programs and/or services. When funding awards are provided for a program year, the potential Contractor has thirty (30) days from the date of the NPWDB, Inc.'s funding award notification letter to get its contractual agreement(s) completed and executed as stated in the NPWDB, Inc.'s contractual agreement. So, should a potential Contractor not have its contractual agreement(s) completed and executed by the deadline date given, the NPWDB, Inc. reserves the authority to immediately rescind the funding award via written notification to the potential Contractor. Further, once this funding is recaptured, the NPWDB, Inc. has the authority to allocate it to another Contractor of its choice (sole sourcing) without having to initiate another public RFP solicitation process. However, this recapturing and re-allocation of funds can only be done if the NPWDB, Inc. has initiated a public RFP solicitation process for the program and/or services in question within the previous six (6) month period. If a public RFP solicitation process has not been initiated within the previous six (6) months, the NPWDB, Inc. will be required to initiate another public RFP solicitation process for the program and/or services in question. Any proposer denied funding through a RFP Process may submit a letter to the NPWDB, Inc. Executive Director requesting further details for the denial of funding. In the event the response is not satisfactory, the potential Contractor may submit a written appeal to the NPWDB, Inc. Board of Directors. An appeal must be submitted within thirty (30) days of the NPWDB, Inc. action not to award a contract. The decision of the NPWDB, Inc. Board of Directors shall be final.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 10

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: Services for Non-Eligible Youth

Regional American Job Centers (Workforce WV Career Centers) must ensure services are provided to non-eligible youth (ie: basic labor exchange services under the Wagner-Peyser Act).

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 11

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Modified Date: June 1, 2016

Subject: Tracking Youth Work Experience Expenditures

Youth Program Provider(s) must track program funds spent on paid and unpaid work experience, including wages and staff costs for the development and management of work experiences for youth and report such expenditures as part of the Monthly Report. The percentage of funds spent on work experiences is calculated based on the total area youth funds expended for work experiences rather than calculated separately for in-school and out-of-school youth. Administrative costs are not subject to the 20% minimum work experience expenditure requirement. Youth Program Provider(s) will be responsible for developing appropriate internal tracking form(s) to track the minimum work experience expenditure requirement. Beginning June 1st, Youth Program Provider(s) must submit its internal tracking form(s), with hard copy backup documentation, to the NPWDB, Inc. Office by no later than the fifth (5th) of each month.

Job Center Staff and Customer Career Planners/Data Control Coordinators must track wages, staff costs, etc. for the development and management of work experiences for youth. Job Center Staff and Customer Career Planners/Data Control Coordinators will use internal Itinerary and Timesheet Forms to track the work experience expenditure requirement. Administrative costs are not subject to the 20% minimum work experience expenditure requirement. Beginning June 1st, Job Center Staff and Customer Career Planners/Data Control Coordinators must submit its internal tracking form(s), with hard copy backup documentation, to the NPWDB, Inc. Office by no later than the fifth (5th) of each month.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 12

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015; Modified Date: March 6, 2017

Subject: Career Services

WIOA authorizes “Career Services” for Adults and Dislocated Workers, rather than Core and Intensive Services as previously authorized by WIA. There are three (3) types of Career Services: Basic Career Services, Individualized Career Services and Follow-Up Services. These Services can be provided in any order; there is no sequence requirement for these Services. These Services will provide our Region with flexibility to target Services to the needs of the customer.

Career Services are to be reported in the MACC System as “Career Services” (Until the necessary changes are made to the MACC System, please report Basic Career Services as Core Services and Individualized Career Services as Intensive Services).

The three (3) Categories of Career Services are defined as follows:

1. Basic Career Services

These Services must be made available to all individuals seeking Employment and Training Services provided in at least one (1) comprehensive American Job Center in the region. Generally, these Services involve less staff time and involvement. These Services include:

- Determination of whether an individual is eligible to receive assistance from the Adult, Dislocated Worker or Youth Programs;
- Outreach and Intake including identification through the State’s Work Profiling and Reemployment Services System of Unemployment Insurance (UI) claimants likely to exhaust benefits and orientation to information and other services available through the one stop delivery system;
- Initial Assessment of Skill Levels including literacy, numeracy and English language proficiency, as well as aptitudes including skill gaps and Supportive Service needs;
- Labor Exchange Services including job search and placement assistance, and when needed, career counseling including provisions of information on in-demand industry sectors and occupation provisions of information on nontraditional employment;
- Provisions of referrals to and coordination of activities with other programs and services including those within the one stop delivery system, and when appropriate, other workforce development programs;
- Provisions of workforce and labor market employment statistics information including the provisions of accurate information relating to local regional and national labor market areas, including job vacancy listings in labor market areas, information on job skills necessary to obtain the vacant jobs listed and information relating to local occupations in-demand and the earnings skill

- requirements and opportunities for advancement for those jobs;
- Provisions of performance information and program cost information on eligible providers of training services by program and type of providers;
- Provisions of information about how the local area is performing on local performance accountability measures as well as any additional performance information relating to the region's one stop delivery system;
- Provisions of information relating to the availability of Supportive Services or assistance and appropriate referrals to those services and assistance including child care, child support, medical or child health assistance available through the State Medicaid Program and Children Health Insurance Program (CHIP) benefits under the Supplemental Nutrition Assistance Program (SNAP) assistance through the Earned Income Tax Credit, housing, counseling and assistance services sponsored by HUD and assistance under the Temporary Assistance for Needy Families (TANF) and other Supportive Services and transportation provided through that program;
- Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA; and,
- Provisions of information and assistance regarding filing claims under UI Programs including meaningful assistance to individuals seeking assistance in filing a claim.

“Meaningful Assistance” means providing assistance onsite using Staff who are properly trained in UI claims, filing and/or the acceptance of information necessary to file a claim or by phone via other technology, as long as the assistance is provided by training and available staff and within a reasonable time

The cost associated in providing meaningful assistance may be paid for by the State's UI program, the WIOA Adult or Dislocated Worker Programs, the Wagner-Peyser Employment Service or some combination thereof these funding sources.

2. Individualized Career Services

Generally, these Services involve significant staff time and customization to each individual's needs. The provisions of individualized career services must be based on the employment needs of the individual as determined jointly by the individual and the Customer Career Planner/Data Control Coordinator and may be identified through an Individual Employment Plan (IEP).

If Job Center Staff determine that Individualized Career Services are appropriate for an individual to obtain or retain employment, these Services must be made available to the individual. These Services must be available in all regional Job Centers. Job Center Staff may use recent previous assessments by partner programs to determine if individualized career services would be appropriate. These services include:

- Comprehensive and Specialized Assessments of the skill levels and service needs of Adults and Dislocated Workers which may include diagnostic testing and use of other assessment tools and in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals;
- Development of an IEP to identify the employment goals, appropriate achievement objectives and appropriate combination of services for the participant to achieve his/her employment goals including the list of and information about eligible training providers;
- Group and or Individual Counseling and Mentoring;
- Career Planning (ie: Case Management);
- Short Term Pre-Vocational Services, including development of learning skills, communication skills, interviewing skills, punctuality personal maintenance skills and professional conduct to prepare individuals for unsubsidized employment or training. In some instances, pre-apprenticeship programs may be considered as short-term pre-vocational services;
- Internships and Work Experiences (including Transitional Jobs) that are linked to careers;
- Workforce Preparation Activities that help an individual acquire a combination of basic academic

skills, critical thinking skills, digital literacy skills, self-management skills, understanding systems and obtaining skills necessary for successful transition into and completion of post-secondary education, training or employment;

- Financial Literacy Services;
- Out-of-Area Job Search Assistance and Relocation Assistance; and,
- English Language Acquisitions and Integrated Education and Training Programs.

The NPWDB, Inc. will use the Test of Adult Basic Education (TABE) and the Career Plan Development Manual for evaluating and assessing WIOA eligible Adults and Youth in the region. The TABE Test will assess and evaluate the skills and knowledge of the WIOA participant and the Career Plan Development Manual will match a participant's skills and interest to specific job(s), career pathway(s), occupation(s), field(s) of study, etc. Job Center staff may use recent previous interviews, evaluations or assessment by partner programs (in addition to NPWDB, Inc. approved assessment tools to determine if individualized career services would be appropriate.

3. Follow-Up Services

Follow-Up Services must be provided for participants as appropriate who are placed in unsubsidized employment for up to twelve (12) months after the first day of employment. Counseling about the work place is an appropriate type of Follow-Up Service. Follow-Up Services do not extend the date of exit in performance reporting.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 13

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: Services for Underemployed Individuals

In addition to providing Career and Training Services to individuals who are unemployed, there remains a significant population of job seekers who are underemployed.

Individuals who are underemployed may include:

- Individuals employed less than full-time who are seeking full time employment;
- Individuals who are employed in a position that is inadequate with respect to their skills and training;
- Individuals who are employed and who meet the definition of a low income individual in WIOA Section 3 (36); and,
- Individuals who are employed but whose current job earnings are not sufficient compared to their previous job's earnings from their previous employment.

Individuals who are underemployed and meet the definition of a low income individual may receive Career and Training Services under the Adult Program on a priority basis.

Individuals who meet the definition of an individual with a barrier to employment who are underemployed may also be served in the Adult Program. Individuals who were determined eligible for the Dislocated Worker Program and who are determined to be underemployed, may still be considered eligible for Career and Training Services.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 14

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015; Modified Date: March 6, 2017

Subject: Training Services

There is no sequence of service requirements for Career Services and Training. This means that Job Center Staff may determine training is appropriate regardless of whether the individual has received Basic or Individualized Career Services first. Training Services may be provided if Job Center staff determines, after an interview, evaluation or assessment, and career planning, that the individual:

- Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through Career Services alone;
- Is in need of Training Services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through Career Services alone;
- Has the skills and qualifications to successfully participate in the selected program of Training Services.
- Is unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds for federal Pell Grants established under Title IV of the Higher Education Act of 1965, or requires WIOA assistance in addition to other sources of grant assistance, including federal Pell Grants;
- Is a member of a worker group covered under a petition filed for Trade Adjustment Assistance (TAA) and is awaiting a determination. If the petition is certified, the worker may then transition to TAA approved training. If the petition is denied, the worker will continue training under the WIOA;
- Is determine eligible in accordance with the State and local priority system in effect for Adults under WIOA Sec. 134(c) (3) (E) if training services are provided through the Adult funding stream; and
- Selected a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in another area in which the individual is willing to commute or relocate.

Except in certain circumstances, Training Services, when determined appropriate, must be provided either through an Individual Training Account (ITA) or through a Training Contract. The Eligible Training Provider List (ETPL) ensures accountability, quality and labor market relevance of programs and ensure informed customer choice for individuals eligible for training. WIOA also provides enhance access and flexibility for work-based training options like, registered apprenticeships, on-the-job training, customized training and incumbent worker training. The list of Eligible Training Providers must be made available to local workforce development boards within the State by WORKFORCE WV in order to maximize customer choice. The selection of Training Services should be conducted in a manner that maximized customer choice, is linked to “high demand” occupations, is informed by the performance of relevant training providers and is coordinated to the extent possible with other sources of assistance.

The NPWDB, Inc. will use NPWDB, Inc. approved assessment tools, and previous assessments, when making training determination in an effort to reduce duplication assessments and develop enhanced alignment across partner programs. The provision of Training Services necessary to assist a participant in achieving his/her employment and/or training goals may be documented in the IEP.

Types of Training Services that may be provided include:

- Occupational skills training, including training for non-traditional employment;
- On the job training;
- Incumbent worker training;
- Programs that combine workplace training with related instruction which may include cooperative education programs;
- Training programs operated by the private sector;
- Skill upgrade and retraining;
- Entrepreneurial training;
- Job readiness training provided in combination with Training Services or transitional jobs;
- Adult education and literacy activities, including activities of English language acquisition and integrated education and training programs provided concurrently or in combination with services provided; and,
- Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 15

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015; Modified Date: March 6, 2017

Subject: Training Contracts

Individual Training Accounts (ITAs) will be the primary method used for procuring Training Services under WIOA (similar to under WIA) in the Region. However, in certain circumstances a contract for Training Services may be developed by the NPWDB, Inc. in combination with, or instead of, ITAs. A combination of ITAs and contracts could be used to support placing participants in programs such as Registered Apprenticeships.

Training Contracts may only be used if at least one (1) of the five (5) circumstances listed below applies and the process for their use is described in the Local Plan of Service. Additionally, the NPWDB, Inc. must ensure that consumer choice requirements are met. Circumstances are:

- On-the-Job Training, Customized Training, Incumbent Worker Training or Transitional Jobs;
- If the NPWDB, Inc. determines there are an insufficient number of eligible providers of Training Services to use ITAs in the local area to accomplish the purpose of a system of ITAs. This determination process must include a public comment period for interested providers of at least thirty (30) days and must be described in the Local Plan of Service;
- If there is a Training Services Program of “demonstrated effectiveness” offered in the Region by a Community Based Organization or other private organizations to serve individuals with barriers to employment. The criteria to be used by the NPWDB, Inc. in defining “Demonstrated effectiveness” is as follows: Financial stability of the organization which must include no audit findings and disallowed or questioned costs during the past five (5) years; Successful performance in the delivery of services to individuals with barriers to employment like, successful completion rate of no less than eighty percent (80%) for the prior two (2) year period; the number of individuals attaining skills, certificates or degrees the program is designed to provide which can be no less than eighty percent (80%) for the prior two (2) year period; and, retention rate of individuals in employment which can be no less than seventy-five percent (75%). Proposed programs of training must be relevant to workforce investment needs identified in the Local Plan of Service;
- If the NPWDB, Inc. determines that the most appropriate training could be provided by an institution of higher education to train multiple individuals for jobs in “high demand” sectors or occupations provided the contract does not limit consumer choice; and,
- If the NPWDB, Inc. determines a “pay-for-performance” contract is the most effective means of providing Training Services.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 16

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Subject: Registered Apprenticeship Programs

Registered Apprenticeship Programs are an important component of potential training and employment services that can be provided to customers. Registered Apprenticeship Programs should be used more often as a career pathway for job seekers and as a job-driven strategy for employers.

Some examples of typical Registered Apprenticeship Sponsors are:

- Employers who provide related instruction. Employers provide formal in-house instruction as well as On-the-Job Training at the worksite.
- Employers who use an outside educational provider(s). Registered Apprenticeship Program sponsors do not provide the related instruction or educational portion of the apprenticeship but rely on an outside education entity to deliver instruction. Employers can use two (2) or four (4) year post-secondary institutions, technical training schools or on-line courses for related instruction. The employer is the eligible training provider and must identify their instructional provider.
- Joint Apprenticeship Training Programs are made up of employers and unions. They have an apprenticeship training school where the instruction portion of the apprenticeship program is delivered. The training schools are usually administered by the union, in which case, the union would be the eligible training provider.
- Intermediaries can serve as program sponsors when they take responsibility for the administration of the apprenticeship program. They also can provide expertise such as curriculum development, classroom instruction and Supportive Services, as appropriate. The intermediary is the eligible training provider and must identify the instructional provider if an outside organization is providing the educational portion of the apprenticeships. Intermediaries include:
 - Educational institutions including two (2) and four (4) year post-secondary institutions or technical schools. In this model the educational institution administers the program, works with employers to hire apprentices and provides classroom or on-line instruction for the apprenticeship program;

- Industry associations that administer the program and work with employers/members and educational entities to implement the apprenticeship program; and,
- Community-based organizations that administer the program and work with employers, educational entities and the community to implement the apprenticeship program.

There are several ways in which Training Services may be used in conjunction with Registered Apprenticeship Programs:

- An ITA may be developed for a participant to receive registered apprentices;
- An On-the-Job Training Contract may be developed with a Registered Apprenticeship Program for training participants. On-the-Job Training Contracts are made with the employer. Registered Apprenticeships generally involved both classroom and On-the-Job instruction. The On-the-Job Training Contract may be made to support some, or all, of the Registered Apprenticeship Program;
- On-the-Job portion of the Registered Apprenticeship Program;
- A combination of an ITA to cover the classroom instruction along with an On-the-Job Training Contract to cover the On-the-Job portion of the registered apprenticeships is allowed; and,
- Incumbent Worker Training may be used for upskilling apprentices who already have established working/training relationships with the Registered Apprenticeship Program.

Supportive Services, in coordination with Career and/or Training Services, may be provided to participants in a Registered Apprenticeship Program. Types of Supportive Services to be provided will be determined by the NPWDB, Inc. and based on need and funding availability.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 17

Original Date of Policy: July 1, 2015

Effective Date: July 1, 2015

Modified Date: November 2, 2015: February 27, 2017

Subject: On-The-Job Training (OJT), Customized Training (CT) Program and Incumbent Worker Training

OJT PROGRAM

OJT is provided under a contract with an employer in the public, private non-profit or private sector. Through an OJT Contract, occupational training is provided to the participant in exchange for reimbursement based on a sliding scale to cover the extraordinary cost of providing the training and supervision related to the training. Employers are not required to document such extraordinary costs. In limited circumstances, the NPWDB, Inc. has the flexibility under WIOA to increase the reimbursement level for an employer taking into account the following factors:

- The characteristics of the participant (ie: length of unemployment, current skill level and barriers to employment);
- The size of the employer (ie: small and medium-sized businesses often have more barriers to participate at lower reimbursement rates);
- The quality of employer-provided training and advancement opportunities; and,
- Other factors like: There being no less than one (1) participant receiving the training; There is no less than a one dollar (\$1.00) increase in wages from pre and post participant earnings; and, Benefit levels, including health benefits, of the employee(s) remain the same or are increased on any level.

The NPWDB, Inc. will also take into account the relation of the training to the competitiveness of the participant.

An OJT Contract will be written with an employer who agrees to pay the participant no less than ten dollars (\$10.00) per hour and is working no less than thirty-five (35) hours per week.

An OJT Contract can be written with an employer in the public or private non-profit sector only when there are no less than ten (10) active OJT Contracts in place in the Region with private-for-profit

employers.

OJT Contracts will not be entered into with an employer if it is delinquent in unemployment insurance or worker's compensation taxes, penalties and/or interest.

OJT Contracts must not be entered into with an employer who has received payments under previous contract(s), WIA or WIOA, if the employer had exhibited a pattern of failing to provide on-the-job training participant(s) with continuous long-term employment as regular employees with wages and employment benefits (including health benefits) and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work.

An OJT Contract must be limited to a period of time required for a participant to become proficient in the occupation for which the training is being provided. In determining the appropriate length of the contract, consideration should be given to the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience and the participant's Individual Employment Plan. An OJT Contract will not exceed a six (6) month period under any circumstance.

OJT Contracts may be written for eligible employed workers when:

- The employee is not earning a self-sufficient wage;
- The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy or other appropriate purposes as identified by the NPWDB, Inc.

OJT Contracts may be written with a Registered Apprenticeship Program or a participating employer in a Registered Apprenticeship Program for the on-the-job training portion of the Registered Apprenticeship Program. Depending on the length of the registered apprenticeships and available funding, WIOA funds may cover some or all of the registered apprenticeship training.

OJT and ITA funds may both be used when placing a participant into a Registered Apprenticeship Program.

CUSTOMIZED TRAINING

CT of an eligible employed individual may be provided to an employer or a group of employers when:

- The employee is not earning a self-sufficient wage;
- The training is designed to meet the special requirements of an employer or group of employers;
- When there is a commitment by the employer to employ an individual upon successful completion of the training;
- If the employer pays for a significant cost of training, no less than fifty percent (50%) of total training costs; and,
- If the employer(s) is not delinquent in unemployment insurance or worker's compensation taxes, penalties and/or interest.

CT can be provided to an employer in the public, private non-profit or private sector.

CT must not be entered into with an employer who has received payments under previous contract(s), WIA or WIOA, if the employer had exhibited a pattern of failing to provide participant(s) with continuous

long-term employment as regular employees with wages and employment benefits (including health benefits) and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work.

CT must be limited to a period of time required for a participant to become proficient in the occupation/skill level(s) for which the training is being provided. In determining the appropriate length of CT, consideration should be given to the skill requirements of the occupation/etc., the academic and occupational skill level of the participant, prior work experience and the participant's Individual Employment Plan.

INCUMBENT WORKER TRAINING

Incumbent Worker Training is designed to meet the special requirements of an employer or a group of employers to retain a skilled worker or avert the need to lay off employees by assisting the worker in obtaining the skills necessary to retain employment. Incumbent Worker training is conducted with a commitment by the employer to regain or avert lay-offs of the Incumbent Worker(s) trained.

An Incumbent Worker under WIOA needs to be employed, meet the Fair Labor Standard Act requirements for an employer/employee relationship and have an established employment history with the employer for at least six (6) months or more. (An Incumbent Worker does not have to meet the eligibility requirements for career and training services for adults and dislocated workers.)

For an employer to be considered for Incumbent Worker funding, the NPWDB, Inc. will look at:

- That the training to be delivered is in a targeted industry as identified by the NPWDB, Inc. (Targeted industries are identified by the NPWDB, Inc. in the Listing of Demand Occupations); or the employee(s) must receive training to address a documented skill shortage in the local labor market.
- The number of participants the employer(s) plans to train or retrain (no less than twenty-five (25));
- The characteristics of the participants in the program (ie: length of unemployment, current skill level and barriers to employment);
- The relationship of the training to the competitiveness of a participant and employer;
- The quality of the training (ie: industry recognized, portable credential, advancement of job opportunities, etc.;
- Job upgrade(s) for participants as a result of training and any backfill position(s) created at the entry level;
- The wage and benefit levels of participants before and after training (Employee(s) receive a measurable wage gain, an increase of no less than one dollar (\$1.00) per hour post training, and an increase in, or maintenance of, benefits earned);
- Whether training will be provided in new equipment or new technologies as a result of new products or processes that enhance an employer's competitiveness or to avoid or avert the possibility of a pending layoff (Employer must have a commitment to retain or avert layoffs of incumbent workers being trained;
- If the employer(s) has had any layoffs (No laid off workers within a twelve (12) month period of request for training funds); and,
- If the employer is not delinquent in unemployment insurance or worker's compensation taxes, penalties and/or interest; and,
- The existence of other training opportunities provided by the employer.

An employer will be required to pay for the non-federal share of the costs of providing training to their Incumbent Workers as followed:

- Ten percent (10%) of the cost for employers with not more than fifty (50) employees;
- Twenty five percent (25%) of the cost for employers with more than fifty (50) employees but not more than one hundred (100) employees; and,
- Fifty percent (50%) of the cost for employers with more than one hundred (100) employees.

Up to twenty percent (20%) of Adult and Dislocated Worker funding combined may be used to provide Incumbent Worker training in the Region.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 18

Date: July 1, 2015

Effective Date: July 1, 2015

Subject: Supportive Services

Supportive Services may only be provided to individuals who are participating in career or training services and unable to obtain Supportive Services through other programs providing such services. In order for Supportive Services under WIOA to be considered, documentation must be maintained by American Job Center staff that a referral for like services was made in an effort to access other potential funding sources and that no other means of funding were either available or suitable so it was necessary to use WIOA funds.

Supportive Services means services such as: transportation, child care, dependent care, housing and needs-related payments that are necessary to enable an individual to participate in activities under the WIOA. The maximum amount of Supportive Services is forty dollars (\$40.00) per week. However, the maximum amount of Child Care reimbursement is fifty dollars (\$50.00) per week.

Needs Related Payments provide financial assistance to participants for the purpose of enabling them to participant in training and are a Supportive Service authorized under WIOA. Unlike other types of Supportive Services, in order to qualify for Needs-Related Payments a participant must be enrolled in training.

Adults must meet all three (3) of the following requirements:

- 1) Be unemployed;
- 2) Not qualify for or have ceased to qualify for unemployment compensation;
- and,
- 3) Be enrolled in a program of training under WIOA.

Dislocated Workers must meet the following requirements:

- 1) Be unemployed; and,
- 2) Have ceased to qualify for unemployment compensation or trade readjustment assistance under TAA; and,
- 3) Be enrolled in a program of training under WIOA by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or if later, by the end of the 8th week after the worker is informed that a short-term

- layoff will exceed six (6) months; or,
- 4) Be unemployed and did not qualify for unemployment compensation or trade adjustment assistance under TAA and be enrolled in a program of training services under WIOA.

At the discretion of the NPWDB, Inc., Needs-Related Payments may be provided to a participant who has been accepted in training and is waiting to start training classes. Unique and unusual circumstances must exist for the NPWDB, Inc. to consider whether these payments will be provided to a participant for up to thirty (30) days prior to the start of training classes.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 19

Date: July 1, 2015

Effective Date: July 1, 2015

Subject: Participant Re-enrollment Policy

The NPWDB, Inc. will only pay training for a participant for one (1) occupation during the two (2) year enrollment period. An ITA participant will not be permitted to change majors or transfer to a different ITA Training Provider.

When an ITA participant completes an ITA Program, he/she cannot reapply for NPWDB, Inc. WIOA funds. The NPWDB, Inc. will pay training for a WIOA eligible participant one (1) time.

However, when an ITA participant withdraws from the ITA Program, he/she cannot reapply for NPWDB, Inc. WIOA funds unless the ITA participant withdrew because: He/She had an illness or injury that caused/would have caused him/her to miss training for an extended period of time; a serious family emergency occurred that caused/would have caused him/her to miss training for an extended period of time; or, if he/she were called back to work. If an ITA participant withdrew from ITA Program for any of the above reasons, he/she must request prior written approval from the NPWDB, Inc. to re-enroll into the ITA Program/reapply for NPWDB, Inc. WIOA funds. The NPWDB, Inc. will require the individual to provide hard copy documentation supporting the reason(s) he/she withdrew from initial (first time) participation in the ITA Program. It will be at the discretion of the NPWDB, Inc. to determine if the individual will be permitted to re-enroll in the ITA Program/reapply for NPWDB, Inc. WIOA funds.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 20

Date: July 1, 2015

Effective Date: July 1, 2015

Subject: Participant Program Completion

All participants must complete and exit training in a WIOA, or WIA, funding program or service on or before the termination date of the contractual agreement. The NPWDB, Inc. will not be responsible for covering any costs, except for Follow-Up Services, associated with participant training after the termination date of the contractual agreement. The NPWDB, Inc. will not be responsible for covering any costs associated with carry-over participants.

This policy does not apply to participants enrolled in the NPWDB, Inc.'s ITA Program.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 21

Date: July 1, 2015

Effective Date: July 1, 2015

Modified Date: November 2 2015, November 24, 2015; March 6, 2017

Subject: Priority of Service Policy

A. Priority of Services Policy for Training Services under WIOA - Adult Funding:

- 1) Veterans and eligible Spouses. This category includes Veterans and eligible Spouses (covered persons) who are also recipients of Public Assistance, other Low Income Individuals or Individuals who are Basic Skills Deficient. Individuals (non-covered persons) who are not Veterans or eligible Spouses but are:
 1. Recipients of Public Assistance;
 2. Low Income; or,
 3. Are Basic Skills Deficient.
- 2) Veterans and eligible Spouses who are not recipients of Public Assistance, who are not Low Income or who are not Basic Skills Deficient.
- 3) Individuals who do not meet the above priorities.

B. Priority of Services Policy for Training Services under WIOA – Dislocated Worker Funding:

- 1) Veterans and eligible Spouses. This category includes Veterans and eligible Spouses (covered persons) who are also recipients of Public Assistance, other Low Income Individuals or Individuals who are Basic Skills Deficient. Individuals (non-covered persons) who are not Veterans or eligible Spouses but are:
 1. Recipients of Public Assistance;
 2. Low Income; or,
 3. Are Basic Skills Deficient.
- 2) Veterans and eligible Spouses who are not recipients of Public Assistance, who are not Low Income or who are not Basic Skills Deficient.
- 3) Individuals who do not meet the above priorities.

Service members exiting the military, including, but not limited to, those who receive or are eligible for UC for ex-service members general qualify as Dislocated Workers. Dislocated Worker funds under Title I can help separating service members to enter or re-enter the civilian labor force. Generally, a separating

service members needs notice of separation, either a DD-214 form from the Department of Defense or other appropriate documentation that shows a separation or imminent separation from the Armed Forces. These documents meet the requirement that the individual has received a notice of termination or layoff to meet the required Dislocated Worker definition. It is appropriate to provide career services to separating service members who will be imminently separating from the military, provided that their discharge will be anything other than dishonorable. The definition of Dislocated Workers includes military spouses who have experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of the spouse. Military spouses also can qualify if they are unemployed or underemployed and are experiencing difficulty in obtaining or upgrading employment. Military spouses may also qualify if they are a dependent spouse of a member of the Armed Forces on active duty whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station or the service-connected death or disability of the service member.

C. Priority of Services Policy for Training Services under WIOA - Youth Funding:

- 1) Individuals must be between the ages of 18-24.
- 2) Individuals must meet WIOA eligibility guidelines.
- 3) Individuals must reside within the six county region (Hancock, Brooke, Ohio, Marshall, Wetzel and Tyler counties).
- 4) Deficient in Basic Literacy Skills. (However, to enroll in an ITA Program, the ITA participant must have a score of at least a twelfth grade level in two (2) out of three (3) areas of reading, math, and/or English on a generally accepted standardized test approved for use in the Northern Panhandle of WV region if required by occupation or training).
- 5) School Drop-Out.
- 6) Homeless, Runaway and/or Foster Child.
- 7) Pregnant or Parenting.
- 8) Offender.
- 9) Any individual, including an individual with disabilities, who requires additional assistance to complete an educational program or secure/maintain employment. (For In-School Youth – An individual who requires additional assistance to complete an educational program or to secure or hold employment; and, For Out-of-School Youth – An individual who requires additional assistance to enter or complete an education program or to secure or hold employment).
- 10) Children of Incarcerated Parents.
- 11) Migrant and Farmworker Youth.

A “low income” individual is an individual who:

- Receives, or is a member of a family that receives, cash benefits under a federal, state or local income based public assistance program;
- Received an income, or is a member of a family that receives a total family income, for the six (6) month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, payments described in subparagraph (A), and old age and survivors insurance benefits received under Section 202 of the Social Security Act that, in relation to family size, does not exceed the higher of the poverty line for an equivalent period; or, seventy percent (70%) of the lower living standard income level for an equivalent period;
- Is a member of a household that received (or has been determined within the six (6) month period prior to application for the program involved to eligible to receive) food stamps pursuant to the Food Stamp Act of 1977;

- Qualified as a homeless individual, as defined in subsection (a) and (c) of Section 103 of the Stewart B. McKinney Homeless Assistance Act;
- Is a foster child on behalf of whom State or local government payments are made; or,
- In cases permitted by regulations promulgated by the Secretary of Labor, is an individual with a disability whose own income meets the requirements of the program, but who is a member of a family whose income does not meet such requirements.

The populations included in “Individuals with barriers to employment” include:

- Displaced homemakers;
- Low income individuals;
- Indians, Alaska Natives and Native Hawaiians;
- Individuals with Disabilities, including youth who are individuals with disabilities;
- Older individuals age 55 and older;
- Ex-offenders;
- Homeless individuals or homeless children and youth;
- Youth who are in or have aged out of the foster care system;
- Individuals who are English language learners, who have low levels of literacy and face substantial cultural barriers;
- Eligible migrants and seasonal farmworkers;
- Individuals within two (2) years of exhausting lifetime TANF eligibility;
- Single parents including single pregnant women;
- Long term unemployed individuals (unemployed for 27 or more consecutive weeks); and,
- Other groups as determined by the Governor of WV.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 22

Date: July 1, 2015

Effective Date: July 1, 2015

Subject: Alternative Schools - Youth

Local youth program(s) must verify a youth's dropout status at the time of WIOA youth program enrollment. A youth attending an alternative school at the time of enrollment is not a dropout. An individual who is out-of-school at the time of enrollment and subsequently placed in an alternative school, or any school, is an out-of-school youth for the purposes of the eighty percent (80%) expenditure rule for out-of-school youth.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 23

Date: July 1, 2015

Effective Date: July 1, 2015

Subject: Definition for “School” – In-School/Out-of-School Definitions

Applicable State law for secondary and post-secondary institutions defines “School.”

In the State of WV, “School” means: Students and teachers assembled in one or more buildings, organized as a unit.

However, for purposes of WIOA, the providers of Adult Education under Title II of the WIOA, YouthBuild Programs and Job Corps Programs are not considered “schools.” Therefore, WIOA youth program(s) may consider youth to be out-of-school for purposes of WIOA youth program eligibility if they are attending Adult Education provided under Title II of the WIOA, YouthBuild or Job Corps.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 24

Date: July 1, 2015

Effective Date: July 1, 2015

Subject: Eligibility Determinant for WIOA Training Programs – For Veterans & Spouses

When past income is an eligibility determinant for WIOA Training Programs, any amount received as military pay or allowances by any person who served on active duty, and certain other specified benefits must be disregarded for the Veteran and for other individuals for whom those amounts would normally be applied in making an eligibility determination. Military earnings are not to be included when calculating income for Veterans or transitioning service members.

Service members exiting the military, include, but not limited to: recipients of Unemployment Compensation for ex-military members, generally qualify as Dislocated Workers. Dislocated Worker funds can help separating service members to enter or re-enter the civilian labor force. A separating service member needs a notice of separation, either a DD-214 Form the Department of Defense, or other appropriate documentation that shows a separation or imminent separation from the Armed Forces qualifies as the notice of termination or layoff, to meet the required Dislocated Worker definition.

Additionally, in most instances an individual will have to be eligible for or exhausted entitlement to unemployment compensation in order to receive Dislocated Worker services. In the case of separating service members, because they may be on a terminal leave from the military, it may make sense to begin providing Career Services while the service member may still be a part of the Active Duty military, but has an imminent separation date. It is appropriate to provide Career Services to separating service members who will be imminently separating from the military, provided that their discharge will be anything other than dishonorable. A separating service member meets the Dislocated Worker requirement that an individual is unlikely to return to his/her previous industry or occupation.

Regarding military spouses, WIOA expands the definition of Dislocated Workers to include military spouses who have lost employment as a direct result of a relocation to accommodate a permanent change in duty station of the spouse. Military spouses may also qualify if they are a dependent spouse of a member of the Armed Forces on active duty whose family income is significantly reduced, as determined by the NPWDB, Inc. because of a deployment, a call or order to active duty, a permanent change of station or the service-connected death or disability of the service member. Military spouses also can qualify if they are unemployed or underemployed and are experiencing difficulty in obtaining or upgrading employment.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 25

Date: August 10, 2015

Effective Date: August 10, 2015

Subject: Recipients of Training Services

Training Services may be made available to employed and underemployed Adults and Dislocated Workers who:

1. Job Center or required Partner staff determines, after an interview, evaluation or assessment and career planning are:
 - Unlikely to or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through Career Services;
 - In need of Training Services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
 - Have the skills and qualifications to participate successfully in Training Services.
2. Have selected a Program of Training Services that is directly linked to the employment opportunities in the region or in another region to which the individual is willing to commute or relocate;
3. Are unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds, TAA, Pell Grants, etc. and/or require WIOA assistance in addition to other sources of grants assistance.

WIOA funding for training is limited to participants who: Are unable to obtain grant assistance from other sources to pay the costs of their training; or, Require assistance beyond that available under grant assistance from other sources to pay the costs of such training. If this is the case, the NPWDB, Inc. and Training Provider will coordinate funds available to pay for training. In making the determination, Job Center staff should take into account the full costs of participating in Training Services, including Supportive Service costs.

A WIOA participant must provide written confirmation to Job Center staff that he/she applied for Pell Grant assistance. A WIOA participant may enroll a WIOA-funded training program while his/her application for a Pell Grant is pending as long as the NPWDB, Inc. and Job Center Staff

have made arrangements with the Training Provider and the WIOA participant regarding allocation of the Pell Grant. If Pell Grant funding is subsequently awarded, the Training Provider must reimburse the NPWDB, Inc. the WIOA funds used to underwrite the training for the amount the Pell Grant covers. Reimbursement is not required for the portion of the Pell Grant assistance disbursed to the WIOA participant for education-related expenses; and,

4. Are determined WIOA eligible under the Adult or Dislocated Worker funding stream.

****Please note, an individual must receive, at a minimum, the following Career Services: Either an interview, evaluation or assessment and career planning or any other method through which Job Center or required Partner staff can obtain enough information to make an eligibility determination to be determined eligibility for Training Services.**

The participant file must contain a “determination of need” for Training Services as determined through the interview, evaluation or assessment and career planning supported by local labor market information and training provider performance information or through any other Career Services received. There is no requirement that Career Services be provided as a condition to receive Training Services. However, if Career Services are not provided before training, Job Center and required partner staff (if requesting/accessing WIOA funding) must document the individual’s circumstances that justify its determination to provide training without first providing Career Services. Said documentation must be provided to the NPWDB, Inc. for approval prior to the individual being accepted/enrolled in a Training Service. There is no required minimum time period for participation in Career Services before receiving Training Services.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 26

Date: September 16, 2015

Effective Date: September 16, 2015; Modification Date: November 27, 2017; *November 15, 2023*

Subject: American Job Center Cost Methodology – Infrastructure Agreement (IFA)

An Infrastructure Agreement (IFA) will be developed by the NPWDB, Inc., One Stop Operator staff and core/required partners for regional American Job Centers. A process will be developed and used when allocating costs among core/required partners (and non-required partners). Each local workforce board, in conjunction with chief elected officials, has the opportunity to fund the costs of one stop infrastructure locally through the Memorandum of Understanding (MOU) negotiations process. Each local MOU must include an IFA, which will outline the budget and partner's share for funding the one stop infrastructure in the local workforce development area. It will be the One Stop Operator staff's responsibility to get approval of the IFA to be used within the one stop system from a majority of contributing core/required partners no less than thirty (30) days prior to July 1st of the program year. Written documentation must be maintained that shows a majority of contributing core/required partners' approved the IFA. The IFA will then be reviewed and approved by the local board and chief local elected officials. The IFA will be reviewed, and updated, no less than once every three (3) years to ensure appropriate funding contribution levels and the effective delivery of career and training programs, activities and services to customers. WIOA requires that a portion of funds provided under various federal laws authorizing a core/required partner's program be used to pay for the creation, maintenance and infrastructure of the local one stop system and the provisions of career services that are applicable to the individual partner's program. It also requires individual partner participation in the operation of the local one stop system in a manner consistent with the terms of the region's MOU and the partner's authorizing law. Subsequently, core/required partners will include the allocable share of common/shared costs in their total cost picture to determine the total cost of operations to perform the functions for which they were funded. The state workforce development board will be tasked with overseeing the processes for funding one stop infrastructure, including ensuring consistency in how local negotiations for sharing the costs of infrastructure occur. Under WIOA, American Job Centers are not direct recipients of federal awards. Rather, they are the locations through which several workforce development programs operate their programs in partnership with other entities and make their services available to the program beneficiaries.

Responsibilities of core/required partners include: 1) Making Career Services available to participants that are applicable to their programs including, but not limited to, basic labor exchanges; 2) Using a portion of their funds to create and maintain the local one stop system including the infrastructure; 3) Entering into a MOU with the local board regarding the operation of the local one stop system; and, 4) Participating in the operation of the local one stop system in a manner consistent with the MOU and the core/required partner's authorizing law. It should be emphasized that career services are the minimum services required to be provided at the comprehensive Wheeling Job Center. But, core/required partners are encouraged to provide such services at other regional American Job Centers.

One stop infrastructure is generally described as the costs of non-personnel resources such as building leases, equipment, supplies and resource rooms. The purpose of the partner programs sharing the costs of infrastructure is to: 1) Maintain the local one stop delivery system to meet the needs of local communities; 2) Reduce duplication by improving program effectiveness through the sharing of services, resources and technologies among program partners; 3) Reduce overhead by streamlining and sharing financial procurement and facilities costs. 4) Encourage efficient use of information technology; 5) Ensure that costs

are appropriately shared by one stop partners by basing contributions on proportionate share of use (Proportional use refers to a partner program contributing its fair share of the costs). The costs of “shared services” may include: Initial intake; Assessment of needs; Appraisal of basic skills; Identification of appropriate services to meet such needs; and, Referrals to other one stop partners and business services; and, 6) Ensure that services provided by one stop partners reduce duplication of services and/or increase financial efficiency at local one stop centers. There are two (2) mechanisms for reaching agreement on the shared costs of infrastructure. The first is the “local mechanism.” The local mechanism includes agreement among the one stop partner programs in a local workforce development area, and the agreement is reflected in the local MOU. The second is the “state mechanism.” The state mechanism occurs through action by the governor to take portions from the one stop partner program at the state level and pool funds for allocation to local workforce developments area that do not trigger the local mechanism for funding one stop infrastructure costs. Local workforce boards shall use as an allocation basis either direct staff salaries, square footage and/or reportable customer traffic flow to a particular program(s) or service at an one stop center. The possible methodologies used to allocate costs among core/required partners include, but are not limited to: Staff time allocated on the basis of time sheets and time distribution records; Facilities allocated on the basis of square footage; Accounting services allocated on the basis of transactions; and, Equipment or supplies allocated based on usage. If a local workforce board would like to use another allocation basis, they make a request and gain approval from Workforce WV. *The local workforce board in Region 5 has selected the square footage allocation basis when determining one stop system costs.* Core/required (and non-required) partners will share in operational and infrastructure costs). Infrastructure methodology will be used to determine common costs of regional American Job Centers and will be based on the premise that federal programs are to bear an equitable proportion of shared costs based on the benefit received by each program. The appropriate sharing of costs of the local one stop system through the one stop infrastructure mechanism(s) is outlined in WIOA and consistent with Uniform Guidance and federal cost principles. One stop infrastructure includes non-personnel costs of operating the one stop delivery system and includes the following:

- **PRIVATE OFFICE SPACE** - Rental of Actual Square Footage of Space Being Rented/Sub-Leased;
- **COMMON OFFICE SPACE** - Rental of Communal Office Space like, Resource Room, Reception Area, Bathrooms, Shared Meeting Space, Walkways;
- **UTILITIES AND MAINTENANCE** - Electric, Gas, Water, Sewage, Internet Connectivity, Telephones, Facility Maintenance;
- **EQUIPMENT** - Assessment-Related Products & Assistive Technology for Individuals with Disabilities, Copier, Fax, Computers, Other Equipment to Serve Customers (not specific to an individual Program Partner);
- **TECHNOLOGY** - Common Intake System, Cost of Creation and Maintenance of an American Job Center Website (not specific to an individual Program Partner); that provides Outreach to Customers by providing Information on One Stop Center Services and/or provides direct access to American Job Center Services. Technology used for Planning & Outreach Activities (this does not include Data Systems or Case Management Systems specific to individual Program Partners). Common Identifier costs;
- **SUPPLIES** - General Office Expenses including but not limited to: Hand Soap, Toilet Paper, Garbage Bags, Hand Towels for Customer usage; and,
- **ADDITIONAL COSTS** - One Stop Personnel Costs (Intake and Triage Staff), Accounting Costs ,External Workshops, Travel and training costs (ie: Gas), Insurance, Postage and Freight, Resource Room Staffing, Security, Signage, Water, Trash, etc.; and,
- **OTHER MISC. COSTS** - Other American Job Center-related Costs and Unforeseen Incidentals & Repairs.

(For a complete list of allowable costs/charges to Core/Required (and Non-Required Partners, please go to Page 48).

In determining the proportional share, the “relative benefit” received from participating in the local one stop system is another step in the cost allocation process. Determining relative benefit does not require partners to conduct an exact or absolute measurement of benefit, but instead to measure a partner’s benefit using

reasonable methods. While not part of infrastructure costs, core/required (and non-required) partners should also negotiate sharing “additional costs,” including personnel costs, for various programs and support activities and operating costs and services that are necessary for the general operation of an American Job Center. Personnel costs include: salaries, wages, fringe benefits of the employees of partner programs or their subrecipients. For example, allocable salary and fringe benefit costs of partner program staff who work on information technology systems (ie: common performance and reporting outcomes) for use by a local one stop center, as a whole, are personnel costs and identified as “additional costs,” not infrastructure costs. The cost of a shared welcome desk or greeter directing employers and customers to the services or staff that are available in the one stop center is a personnel expense. These costs, therefore, are not included in infrastructure costs but are included in “additional costs” in the one stop operating budget. (Permissible types of funds used for infrastructure costs and “additional costs” of operating a local one stop delivery system may differ depending upon the partner program’s authorizing law and implementing regulations. Infrastructure funding may be from funds classified as administrative, program or both depending on the partner program’s requirements).

A. *Cash.*

- Is the source of funds that may be used to pay for infrastructure costs depends on the requirements regarding the use of funds under the law authorizing the partner program that is contributing the funding. WIOA title I programs, including adult dislocated worker and youth programs; Native American programs; Youth Build; Job Corps programs; and, Migrant and seasonal workers programs can use program funds, administrative funds or both. Senior Community Service Employment Program; Trade Adjustment Assistant Programs, Re-entry Employment Opportunities Programs may use program funds, administrative funds or both. With regard to Wagner Peyser Act ES programs; Jobs for Veteran State Grants and Unemployment Compensation Programs, these programs do not distinguish between program and administrative funds. Therefore, any of the funds allotted for these programs may be used to pay for infrastructure costs.

Allowable Cash Contributions for Infrastructure Costs:

- *Adult Education and Family Literacy Act* - Infrastructure costs are to be paid from federal funds made available for local administration. Non-federal resources that are cash, noncash, or third-party-in-kind contributions may also be used. The federal funds available for activities other than local administration may not be used for such costs.
- *Vocational Rehabilitation (VR)* – This program does not distinguish between program and administrative funds. Non-federal resourced that are cash, non cash, or third-party-in-kind contributions may be used. The regulations clarify that one stop system infrastructure costs are allowable administrative costs under the VR program. Therefore, although the VR program imposes no limits on the amount of funds that may be spent on administrative costs, VR agencies must report funds spent for infrastructure costs as administrative costs. Furthermore, VR agencies may not count third -party-in-kind contributions toward meeting their match requirement under the VR program when such contributions are used for one stop operating costs.
- *Perkins V Act* – Federal funds made available for local administration may be used to pay infrastructure costs. Non-federal resources that are cash, non-cash, or third-party, in-kind contributions and other funds made available by the state may also be used to pay infrastructure costs.
- *Housing and Urban Development Employment and Training Programs, Community Service Block Grant Programs and Temporary Assistance for Needy Families* - These partner programs may determine what funds they will use to pay for infrastructure costs. The use

of these funds must be in accordance with the requirements of WIOA and with the relevant partner's authorizing statutes and regulations, including prohibitions against supplanting non-federal resources, statutory limitations on administrative costs and all other applicable legal requirements.

B. Core/Required Partner Non-Cash/Third-Party-In-Kind Contributions for Infrastructure Costs.

- In-kind contributions are not preferred. If in-kind contributions must be used, the local workforce board should ensure that the contribution(s) is compliant with 2 CFR 200.306. The contribution must be: Verifiable from the entity's records and not included as contributions for any other federal awards; Necessary and reasonable for accomplishment of project or program objectives; Allowable under 2 CFR subpart E; Not paid by the federal government under another federal award, except where the federal statute authorizing a program specifically provides that federal funds made available for such program can be applied to matching or cost sharing requirements of other federal programs; and, Provided for in the approved budget when required by the federal awarding agency; and, conform to other provisions of 2 CFR Part 200.

C. Funding from Philanthropic Organizations, Private Entities, Alternative Financing Options.

- Described in WIOA sec. 121(c)(2)(A)(ii) and 20 CFR 678.715, 34 CFR 361.715 The local one stop system permits One Stop Operator staff and core/required partners to decide how they will pay their total allocable share of common American Job Center costs in the MOU. Under no circumstances will any core/required partner pay more, or less, than its allocable fair share of total costs. Furthermore, no core/required partner may pay for costs that are not allowable under its governing statutes and regulations and 34 CFR 463.715.

After the budget is prepared, One Stop Operator Staff, via the MOU, will determine how each core/required partner (and non-required) will pay its allocable fair share. The method of payment(s) for shared costs is to be applied consistently. However, in some circumstances, cost allocation and resource sharing methodologies, including the methodologies used to determine proportionate fair share of costs, may need to be modified if actual experience is either different from what One Stop Operator staff and core/required partners planned or if it has been determined that methods being used are resulting in inequitable distributions. In this case, it is often best to modify the methodologies as soon as possible. It will also be necessary to modify the IFA when any change(s) is made. Any cost allocable to a particular federal award or cost objective under the principles provided for may not be charged to other federal awards to overcome fund deficiencies, to avoid restrictions imposed by law or terms of the federal awards, or for other reasons. However, this prohibition would not preclude governmental units from shifting costs that are allowable under two (2) or more awards in accordance with existing program agreements. One Stop Operator staff will invoice all core/required partners (and non-required partners) consistently using the same payment term(s). It is important that all parties work together to keep regional American Job Centers operating effectively and efficiently on a continuous basis. This is why it is imperative that core/required (and non-required) partners that contribute to the sustainment of the local one stop system always ensure that they reimburse One Stop Operator staff their proportional, fair share of costs in a timely manner. It is just as equally important that One Stop Operator staff ensure that billings to contributing core/required (and non-required) partners are provided in a timely, efficient manner and in accordance with the approved IFA (It will be the responsibility of One Stop Operator staff to inform the NPWDB, Inc. of any contributing core/required (and non-required) partners who, for whatever reason(s), are not reimbursing One Stop Operator Staff their proportional, fair share of agreed upon costs in a timely manner. Additionally, it will be the responsibility of contributing core/required (and non-required) partners to inform the NPWDB, Inc. of any billings that are not received in a timely manner and in accordance with the approved IFA. Should any contributing core/required (or non-required) partner fail to reimburse and/or fall behind on reimbursement payments by more than sixty (60) days, the NPWDB, Inc. reserves the authority to request that the contributing core/required (or

non-required) partner vacate the American Job Center premises within ten (10) working days of written notification. The contributing core/required (or non-required) partner will still be liable for any remaining funds owed to One Stop Operator staff. Should One Stop Operator staff fail to bill/fall behind on American Job Center billings to the contributing core/required (or non-required) partner by more than sixty (60) days, the NPWDB, Inc. reserves the authority to issue sanction(s)/request a corrective action plan in accordance with the One Stop Operator contractual agreement.

One Stop Operator staff will routinely review and reconcile the budget to actual costs as appropriate by no less than once every six (6) months. One Stop Operator staff will provide all contributing core/required (and non-required) partners and the NPWDB, Inc. with a quarterly expenditure report for each American Job Center. This Report will be due to stakeholders by no later than fifteen (15) days after the end of the quarter being reported. The Report for the last quarter of the program year will be due to contributing core/required (and non-required) partners by no later than August 15th.

Infrastructure Agreement Modifications - Corrections or adjustments to the budget may be made on an ongoing basis to reflect actual levels. The budget, including the allocable core/required (and non-required) partners' portion of American Job Center shared costs, may need to be adjusted from time to time to conform to actual circumstances. One Stop Operator staff will make this determination and provide core/required (and non-required) partners with a hard copy of the modified budget detailing adjustment(s) needed. It is the responsibility of One Stop Operator staff to get approval of any modification(s) made to the original IFA. Adjustment(s) made to the budget must be approved by a majority of contributing core/required partners and the NPWDB, Inc. One Stop Operator staff must maintain written documentation to support a majority of contributing core/required partners approved the IFA modification(s). Once approved by a majority of core/required partners, the NPWDB, Inc. will formally certify the adjustment(s) made to the budget prior to its implementation. The following circumstances will trigger a modification to the IFA: 1) A reduction in a core/required partner contribution due to the addition of another, new partner(s) at an American Job Center, which will result in reduced costs for existing core/required partners; and, 2) An increase of cost to a core/required partner because an existing partner is leaving an American Job Center, which will result in increased costs for existing core/required partners. There is no need to complete a modification to the IFA when an adjustment(s) is made within an individual line item(s) because it will not change the total monetary amount of the IFA or MOU.

Complete Listing of Allowable Costs/Charges to Core/Required (and Non-Required) Partner In the Infrastructure Agreement

<u>Cost Item</u>	<u>Cost Category</u>	<u>Cost Pool/Center</u>
Accounting costs	Career Services	Accessibility Software and Tools
Signage	Infrastructure	Utilities/Maintenance
Telephone (shared)	Shared Costs	Breakroom
Assistive Technology		Career Services
Cleaning		Common Intake System
Electricity		Consultants and Contract Expenses
Equipment		Contracted Services
External Workshops		Copier/Fax Room
Gas		Facilities
Insurance		General Office Expense
Intake and Triage Staff		Information Technology
Internet (shared)		Office Space/Cubicles
Janitorial Services		Outreach Costs
Landscaping/Groundskeeping		Parking
Lease		Reception Area
Legal Notices		Resource Center
Outreach		Shared Meeting Space
Pest Control		Signage
Postage and Freight		Software
Printing		Supplies
Reception Staff		Telecommunications
Resource Room Staffing		Travel/Training Costs
Security		
Training (staff)		
Trash		
Water		

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 27

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Process for Developing an Individualized Education Plan (IEP) and an Individual Service Strategy (ISS) for Youth Who Are Provided WIOA Services in Region 5

- STEP 1 – Job Center staff will be responsible for completing Line Items I-VI of the IEP/ISS document.
- STEP 2 – The Youth Training Provider will be responsible for completing Line Items VII - IX of the IEP/ISS.
- Job Center staff will be responsible for completing this portion of the IEP/ISS document in only those cases when participating youth are not immediately referred to a WIOA Training Provider due to existing barriers that do not enable them to be referred.
- STEP 3 – Once the IEP/ISS has been completed, participating youth must provide his/her signature. It will be the responsibility of staff who completes the IEP/ISS to secure participating youth's signature on this document.
- STEP 4 – The original IEP/ISS is to be returned to the Job Center staff once completed. The original IEP/ISS is to be maintained in participating youth's permanent file. The Training Provider will maintain a copy of the IEP/ISS for their records.

If any modifications are made to the IEP/ISS by the Training Provider, they must be documented and submitted to the Customer Career Planner(s)/Data Control Coordinator(s) staff on a regular basis. Any other updates to the IEP/ISS are to follow the same procedure. All modifications and/or updates are to be attached to the original IEP/ISS by the Job Center staff.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 28

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Definition of Dislocated Worker for Region 5

The term Dislocated Worker means an individual who –

- Has been terminated or laid off, or who has received a notice of termination or payoff from employment;
- Is eligible for or has exhausted entitlement to unemployment compensation;
- Has been employed for a duration sufficient to demonstrate to the appropriate entity at a regional Job Center, attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under State unemployment compensation law;
- Is unlikely to return to a previous industry or occupation;
- Has been terminated or laid off or has received a notice of termination or layoff from employment as a result of any permanent closure of or any substantial layoff at a plant, facility or enterprise;
- Is employed at a facility at which the employer has made a general announcement that such facility will close within one hundred and eighty (180) days or for the purposes of eligibility to receive services other than training services career services or supportive services is employed at a facility at which the employer has made a general announcement that such facility will close;
- Was self-employed but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters;
- Is a displaced homemaker; and,
- Is a military spouse who has lost employment as a direct result of a relocation to accommodate a permanent change in duty station of the spouse. A Military spouse may also qualify if he/she is a dependent spouse of a member of the Armed Forces on active duty whose family income is significantly reduced, as determined by the NPWDB, Inc. because of a deployment, a call or order to active duty, a permanent change of station or the service- connected death or

disability of the service member. A Military spouse also can qualify if he/she is unemployed or underemployed and are experiencing difficulty in obtaining or upgrading employment.

Attachment to the workforce is defined as: Individuals who have received any type of paid employment for a period of no less than three (3) months.

Long Term Unemployed is defined as: Individuals who at the time of registration are unemployed and have been unemployed for any twelve (12) out of the last twenty six (26) weeks may be classified as long-term unemployed and served as dislocated workers under National Emergency Grants. The twelve (12) weeks do not have to be consecutive.

Priority means: Dislocated Workers who are unemployed and those workers who have been notified of a pending termination, layoff, dislocation or plant closing will be given priority of service.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 29

Date: September 16, 2015

Effective Date: September 16, 2015; July 1, 2022; Modification Date: November 15, 2023

Subject: Individual Training Account (ITA) Policy

Each regional Job Center will serve as a key access point for ITAs. The following points will guide the region's ITA Program:

- ITA will be used only to procure Career and Training Services from certified, eligible Training Providers.
- Job Center staff will be knowledgeable and be available to assist customers to make informed choices about their career development strategies. Staff will provide interested customers with copies of most recent Training Provider Report Cards. These Report Cards will supply customers with Training Providers' past program performance data, etc.
- ITAs will be administered and authorized by the NPWDB, Inc. The NPWDB, Inc. will be responsible for approving all payments for participating customers.
- ITAs will be used as a mechanism for providing eligible Adults, Dislocated Workers and Older youth, ages 18-24, with means to obtain training in an effort to receive full-time, unsubsidized employment.
- ITA funds can only be used after the participant has applied for and exhausted all other available sources of assistance.
- ITAs can only be used for programs listed and approved on the statewide list of eligible Training Providers.
- NPWDB, Inc. ITAs can only be used to support residents within the Northern Panhandle region except for Dislocated Workers. Dislocated Workers should be either a resident of the Northern Panhandle or laid-off from a WV company in the Northern Panhandle region.
- ITAs can only be used to provide training for occupations "demand" in the region and surrounding areas.

- To be eligible to receive ITA funding for a college level training program a participant must have a score of at least a twelfth (12th) grade level in two out of three areas of reading, math, and/or English on a generally accepted standardized test approved for use in the Northern Panhandle region if required by occupation or training.
- Participating customers must meet the admissions requirements for the Training Program chosen for attendance.
- The maximum limit for an ITA is \$5,500 per program year per participant not to exceed \$11,000 for a period not to exceed two (2) years. The participating customer must be considered likely to complete the Training Program within a two (2) year period.
- The costs of any repeated course(s), lost books, etc. shall not be borne by the NPWDB, Inc. and/or WIOA.
- An eligible individual may receive more than one (1) ITA if it is for an occupation within the same industry/career pathway (ie: Certified Nursing Assistant to Licensed Practical Nurse or Class B CDL to Class A CDL, etc.) In order to receive more than one (1) ITA, the eligible individual must show proof of successful completion of all prior ITA-funded training. Receipt of more than one (1) ITA requires prior approval from the NPWDB, Inc. ITAs will not pay for course repeats. An ITA participant will not be permitted to change majors or transfer to a different ITA Training Provider.
- When a participant completes the ITA Program, he/she cannot reapply for NPWDB, Inc. WIOA funds. When a participant withdraws from the ITA Program, he/she cannot reapply for NPWDB, Inc. WIOA funds unless the participant withdrew because: He/She had an illness or injury that caused/would have caused him/her to miss training for an extended period of time; a serious family emergency occurred that caused/would have caused him/her to miss training for an extended period of time; or, if he/she were called back to work. If a participant withdrew from ITA Program for any of the above reasons, he/she must request approval from the NPWDB, Inc. to re-enroll into the ITA Program. The NPWDB, Inc. will require the participant to provide hard copy documentation supporting the reason(s) he/she withdrew from initial (first time) participation in the ITA Program. It will be at the discretion of the NPWDB, Inc. to determine if a participant will be permitted to re-enroll in the ITA Program/reapply for NPWDB, Inc. WIOA funds.
- WIOA funds will not be approved for the following: home study courses, sectarian activities, tutorial classes, preparatory classes and remedial classes.
- The NPWDB, Inc. will not provide ITA funding for training in the following fields: barber/cosmetology training and sewing machine operators. The NPWDB, Inc. reserves the authority to not fund other types of training if it has been determined there is an excessive labor pool for a particular occupation.
- WIOA funds will not be used for any training that occurred prior to funding for the ITA being approved by the NPWDB, Inc.
- All participants must maintain full-time status (12 credit hours) unless the student has already completed courses toward the desired occupation and it is determined by the NPWDB, Inc. that they would complete the program within a one (1) year period.
- Participants will be paid Supportive Services based on the available budget after training is obligated and in accordance to the NPWDB, Inc. Supportive Services Policy.

- Continued participation in the ITA Program is based on satisfactory progress as defined and documented by the NPWDB, Inc. If a participant's grade average falls below 2.0 for any semester/quarter, the participant will be placed on probationary status for the following semester/quarter. A participant may only be placed on probationary status one time during participation in the ITA Program. If the grade level falls below 2.0 in an additional semester/quarter the participant will be automatically withdrawn from the ITA Program by the NPWDB, Inc.

The NPWDB, Inc. reserves the authority to reject a request for ITA funding if occupational training requested is not on the list of “demand occupations” approved by the NPWDB, Inc. The NPWDB, Inc. reserves the right to terminate funding for the ITA Program should a reduction or loss of funding by the U.S. Department of Labor or the Governor of the State occurs. Participant will be notified, in writing, at least five (5) working days in advance of the effective date of such termination of funds.

The Priority of Service Listing must be adhered to when enrolling individuals into the ITA Program.

Types of Agencies/Institutions that can provide training are: Post-secondary education institution that: a) is eligible to receive federal funds under Title IV of the Higher Education Act of 1965; b) provides a program that leads to an associate degree, baccalaureate degree, or certificate; An entry that carries out programs under the National Apprenticeship Act. Another public or private provider of a program of Career and Training services such as Adult Education programs, community-based organizations and private training operators.

TYPES OF AGENCIES/INSTITUTIONS THAT CAN PROVIDE ITA TRAINING

1. Post-secondary education institution that:
 - a) is eligible to receive federal funds under Title IV of the Higher Educational Act of 1965;
 - b) provides a program that leads to an associate degree, baccalaureate degree, or certificate;
2. An entry that carries out programs under the National Apprenticeship Act;
3. Another public or private provider of a program of training services such as Adult Education programs, community-based organizations and private training operators.

TYPES OF TRAINING PROGRAMS REQUIRING CERTIFICATION

- Occupational Skills Training,
- Programs that Combine Workplace Training with Related Instruction,
- Training Operated by the Private Sector,
- Skills Upgrade and Retraining,
- Job Readiness Skills,
- Entrepreneurial Training,
- Adult Education and Literacy Provided in Combination with Any of the Above.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 30

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Policy on Earned Profit

It is allowable for private for-profit or non-profit organizations to earn program income through a contract with the NPWDB, Inc.

If program income is earned by a non-profit organization, said income must be re-allocated and spent on WIOA program activities and/or services only. Documentation must be kept showing how program income was re-allocated back and spent on WIOA program activities and/or services. (However, if a contract is terminated with a non-profit organization, any and all program income must be returned to the NPWDB, Inc. within twenty (20) calendar days after contract termination).

The NPWDB, Inc. reserves the right to examine any financial documents relating to an organization's program income.

Profit to be earned by a Job Center Operator, through the execution of a One Stop partner's agreement, is to be negotiated, but at no time can exceed five percent (5%) of a partner's total financial contribution to a Job Center's operational costs.

Excessive profit is profit that is earned by an organization that is more than five percent (5%) of budget award provided by the NPWDB, Inc. Should profit exceed the allowable amount, the NPWDB, Inc. reserves the right to renegotiate the terms and conditions of the contractual agreement.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 31

Date: September 16, 2015

Effective Date: September 16, 2015; Modification Date: November 27, 2014; November 15, 2023

Subject: Memorandum of Understanding (MOU) Policy for Region 5

A MOU is an agreement executed between the NPWDB, Inc. and WIOA core/required (and non-required) partners in the region. The MOU is one of the important accountability tools the WIOA provides to local boards to help foster partners' cooperation, service quality and continuous improvement as the American Job Center delivery system is being built and maintained. It is intended to clearly define the roles and responsibilities of the local workforce development board, the One Stop Operator and core/required (and non-required) partners. The MOU will contain the time period for which the agreement is effective.

The NPWDB, Inc. may choose to develop one (1) MOU that covers the provisions for all core/required partners and non-required partners or decide to execute separate MOUs for each core/required partner (and non-required partner) or a combination of approaches.

The NPWDB, Inc. and One Stop Operator Staff will enter in to good faith negotiations with core/required partners (and non-required partners) on behalf of the local board and Chief Elected Official when negotiating terms and conditions of MOUs with core/required (and non-required) partners. Negotiations efforts will be documented.

The MOU will include contributions made to the one stop system through other avenues, such as donations made by a non-partner entity. Third party in-kind contributions will be documented.

MOUs will have same terms for all partners and will be consistent. Each MOU agreement must be shared with all other partners. Any modification to an MOU must also be shared with all other partners.

A core/required partner is responsible to the one stop system for the following; providing career services at regional American Job Centers, providing access to other services, using a portion of their funds to help establish and operate the one stop system, to name a few.

Once the MOU is fully executed, it will contain the signatures of the Chair of the Board, the Chief Elected Official, the Executive Director and the core/required (or non-required) partner.

The following are the minimum elements required in the MOU:

- 1) A description of the services to be provided by each core/required (and non-required) partners through the one stop delivering system, including the manner and frequency in which the services will be coordinated and delivered through the system; the frequency of program staff's physical presence at comprehensive and affiliate sites;
- 2) Methods of referral of customers between the Job Center Operator and core/required partners;

3) Methods to ensure the needs of workers, youth and individuals with barriers to employment, including individuals with disabilities, are addressed in providing access to services including access to technology and materials that are available through the one stop delivery system; access to technology and materials available through the one stop delivery system.

4) The duration of the MOU and procedures for amending it;

5) Assurances that each MOU will be reviewed, and if substantial changes have occurred, renewed no less than one (1) time every three (3) years to ensure appropriate funding and delivery of services and reflect any changes in the signatory official of the Board (the Chair), Chief Elected Official, Executive Director, core/required partner (or non-required), one stop infrastructure funding, etc. Renewal of an MOU required all parties to review and agree to all elements of the MOU and re-sign the MOU. Amendment or modification of the MOU only requires the parties to review and agree to the element of the MOU that changed. (Non-substantial changes to the MOU, such as minor revisions to the budget or adjustment made due to quarterly reconciliation to the budget, do not require renewal of the MOU. These changes may occur through the local MOU amendment procedures established at the local level. Substantial changes, such as changed in one stop partners or a change due to the election of a new CLEO, will require renewal of the MOU);

6) Alignment with State and Local Plan;

7) Development of an operational plan, including center management and services;

8) How specialized American Job Centers may be implemented;

9) There will be a determination of operating costs, inclusive of shared costs, for regional American Job Centers and detailed in the Infrastructure Agreement (IFA).

- The IFA will be made a part of the MOU and will be effective for the same time period as the MOU. The IFA will describe how costs of services and operating costs will be funded, including infrastructure costs consistent with Policy 300-04. The One Stop budget will consist of two (2) types of costs: Infrastructure costs; and, Additional costs, which consist of shared operating costs and shared services that are related to the operation of the one stop delivery system (but do not constitute infrastructure costs).
- The IFA will include estimated costs for the delivery of Career Services by core/required partners and the NPWDB, Inc./One Stop Operator.
- Identification of infrastructure and shared services budget that will be periodically reconciled against actual costs incurred and adjusted accordingly to ensure that it reflects a cost allocation methodology that demonstrates how infrastructure costs are charged to each partner, core/required (and non-required), in proportion to relative benefits received and the partner's use of the one stop system. Even for in-kind contributions, quarterly reconciliation will be conducted to ensure that the cost allocation methodology reflects each partner's relative benefit.
- Core/required partners, the local board and Chief Elected Official will participate in the development of the infrastructure funding arrangement.
- The local board, Chief Elected Official and core/required partners will adhere to the State one stop infrastructure process.

IMPASSE SITUATIONS

There is always a possibility that the NPWDB, Inc. and a core/required partner may not be able to reach an agreement on the terms and conditions of a MOU, including infrastructure costs methodology. If this is the case, the WorkForce WV Office will be asked to assist the NPWDB, Inc. in resolving any issues that may arise. The WorkForce WV Office will attempt to work with the NPWDB, Inc. and their State or federal counterpart to help work out an agreement. The NPWDB, Inc. will report any failure to execute an MOU with a core/required partner to WorkForce WV Office and the Chief Elected Official in the region. The WorkForce WV Office is required to report the impasse to the DOL and the head of the federal agency responsible for the oversight of the core/required partners' program, if different from the DOL. Any core/required partner that fails to execute a MOU with the NPWDB, Inc. may result in the local area not being eligible for State incentive grants that rewards areas for effective coordination of services.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 32

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Method To Be Used in Gathering, Compiling and Reporting One Stop Center Data

Any job seeking and employer customers who access and use American Job Center services, either on or off site, must be included in all American Job Center data gathering and reporting. Repeat job seeking and employer customers and youth who access and use American Job Center services must also be included.

Each participating partner will be responsible for gathering and forwarding the requested job seeking and employer customer data related to their specific service(s) to the Job Center Operator. Data is to be provided to the Job Center Operator no less than once quarterly. The Job Center Operator will work closely with participating partners to insure data gathered accurately represents the performance achieved. Data gathered will then be compiled by the Job Center Operator and forwarded to the NPWDB, Inc. on a quarterly basis.

A standard form will be developed by the Job Center Operator for use by participating partners when reporting job seeking and employer customer data.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 33

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Youth Certificate/Credential Policy

A certificate/credential is defined as a nationally recognized degree or certificate or state/locally recognized certificate.

Certificate/Credentials include, but are not limited to: a high school diploma, GED or other recognized equivalents, post-secondary degrees/certificates, recognized skill standards, and licensure or industry-recognized certificates.

A certificate/credential should:

- Be valid and credible with employers within the industry to which it relates,
- Not discriminate with respect to race, color, gender, age, religion, ethnicity, disability, or national origin, consistent with Federal civil rights laws,
- Use various evaluation techniques, including, where appropriate, oral and written evaluations, portfolio assessments, and performance tests.
- Be transferable from State to State or County to County within a State.
- The following types of certificate/credentials will be allowable:
 - Diploma;
 - Certificate of Equivalency (GED);
 - Associate/Bachelor Degree;
 - Diploma or Competency Based Certificate issued by an institution of higher education that is legally authorized to offer postsecondary education (certificates of completion and certificates of attendance are not acceptable credentials because they are not competency based); and,

- Occupational Skills License, Certificate or Credential recognized by a State Board/State Education Agency, governmental body, union (registered apprenticeship program), appropriate industry, employer or private training provider, Job Corp, tribal colleges, programs approved by the Veterans Affairs and public regulatory agencies.

Appropriate hard copy documentation of certificate/credential attainment must be maintained in the participant's file as well as in the NPWDB file. Appropriate documentation includes the following:

- Copy of diploma, GED, degree;
- Letter from training institution attesting to the attainment of degree;
- Copy of license, certificate or credential; and
- Transcripts.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 34

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Adult/Dislocated Worker Credential Policy

A credential is defined as a nationally recognized degree or certificate or state/locally recognized certificate or other approved credential. Credentials include, but are not limited to: a high-school diploma, GED or other recognized equivalent, post-secondary degrees/certificates, recognized skill standards, and licensure or industry recognized certificates. This includes all State Education Agency recognized credentials as well as certificates issued to recognize successful completion of training programs. The following types of credentials will be allowable:

- A Diploma;
- Certificate of Equivalency (GED);
- Associate/Bachelor Degree;
- Diploma or Competency Based Certificate issued by an institution of higher education that is legally authorized to offer post secondary education
- Occupational Skills License, Certificate or Credential recognized by a State Board, governmental body, union, appropriate industry or private training provider;
- Certificates of completion for training programs that equip individuals to enter or re-enter employment, retain employment, or advance into better employment (ie: On-the-Job Training, Work Readiness Classes, Customized Training); and,
- Appropriate hard copy documentation of credential attainment must be maintained in the participant's file as well as the NPWDB, Inc.'s file. Appropriate documentation includes the following:
 - Copy of Diploma, GED, degree;
 - Letter or other documentation from training institution indicating attainment of the credential;
 - Copy of license, certificate or credential; and,
 - Completion of no less than one semester/quarter at an institution of higher education. Completion is defined as earning at least twelve (12) credit hours and obtaining a 2.0 GPA or higher.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 35

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: ITA Program Waiting List

The following will be the policy for contacting individuals on the region's ITA Program Waiting List:

A). All individuals on the ITA Program Waiting List are to be contacted no less than one (1) time every six (6) months. Documentation of contact made must be maintained in the individual's file.

B). Whenever funding becomes available at the start or during a program year, all individuals are to be contacted either by phone or written correspondence. Documentation of all contact is to be maintained within the individual's folder.

If phone contact is made, an individual on the ITA Program Waiting List has two (2) working days to make contact with you. If contact is not made within this timeframe, that individual loses his/her spot on the ITA Program Waiting List.

If written correspondence is sent to an individual on the ITA Program Waiting List, that individual has five (5) working days to make contact with you. If contact is not made within this timeframe, that individual loses his/her spot on the ITA Program Waiting List.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 36

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Chartering Process for Job Center Operator

Chartering encourages high quality service delivery through its statement of goals, standards and expected outcomes. A charter is the Northern Panhandle Workforce Development Board, Inc.'s (NPWDB, Inc.'s) personal guarantee to the community that an American Job Center (ie: Workforce WV Career Center) is committed to quality processes, continuous improvement and outstanding performance.

Charters ensure accountability by establishing a formal relationship between the NPWDB, Inc. and the Job Center Operator(s)/Required Partners.

The NPWDB, Inc. has the responsibility to charter American Job Centers. The state provides the statewide vision and general guidelines for the one stop system. The NPWDB, Inc. establishes local expectations through chartering criteria in concert with the state vision.

Chartering criteria will be determined by the NPWDB, Inc. The NPWDB, Inc. will provide ongoing technical assistance, training and support to the one stop system as needed. The NPWDB, Inc. and the Job Center Operator/Required Partners may assist in identifying needs and developing strategies and resources to build the capacity of the one stop system to deliver high quality services to customers.

The process requires the Job Center Operator (s) to develop a Business Plan to be approved by the NPWDB, Inc. The Business Plan will chart the path to service excellence by the Job Center Operator and is one of the mechanisms from which the NPWDB, Inc. will determine the readiness of the Operator to develop a customer focused Job Center.

Only chartered Job Centers, approved affiliate sites and access points may use the “American Job Center (or Workforce WV Career Center)” logo, name and signage. Job Centers must meet all federal and State criteria for designation as a Job Center in order to be fully chartered by the NPWDB, Inc.

All required partners must physically be co-located on-site and providing services to customers in no less than one (1) Job Center in the region.

Required partners as identified in the Workforce Innovation & Opportunity Act (WIOA) of 2014:

- Programs authorized under Wagner-Peyser Act;
- Adult Education and Literacy activities authorized under Title II;
- Programs authorized under Title I of the Rehabilitation Act of 1973;
- Programs authorized under Title V of the Older Americans Act of 1965;
- Career and Technical Education Programs at the post-secondary level authorized under the Carl D. Perkins Career and Technical Education Act of 2006;
- Activities authorized under Chapter 2 of the Trade Act of 1974;
- Employment and training activities carried out under the Community Services Block Grant Act;
- Employment and Training activities carried out by the Department of Housing and Urban Development;
- Programs authorized under the State Unemployment Compensation Laws;
- Programs authorized under Part A of Title IV of the Social Security Act (Temporary Assistance for Needy Families); and,
- Programs authorized under Section 212 of the Second Chance Act of 2007.

Other “Optional” Partners:

- Other appropriate Federal, State, or local Programs, including Programs in the Private Sector.

Responsibilities of required partners in one stop systems as described in the WIOA:

- Must provide access to programs or activities including making the career services available at Job Centers.
- Use a portion of funds to maintain the one stop delivery system, including payment of infrastructure costs of Job Centers.
- Must enter into a Memorandum of Understanding (MOU) with the NPWDB, Inc.
- Participate in the operation of the one stop system consistent with the terms/conditions in the MOU and the requirements of the WIOA.

Other State and Local Requirements:

- During hours the Job Center is open, customers may be screened for initial eligibility and appropriateness for any required partner resource and have an appointment confirmed to complete the process before the customer leaves the Center.
- Job Center Operator/Required Partners must ensure access to programs and services provided through co-location of staff, electronic linkages (on-line applications, form completion and appointment setting), cross training staff or other agreements between service providers and the partners to ensure customer access to services at the Job Center.
- Itinerant services are not acceptable. Informational brochures or maps to a partner’s offices are not acceptable.

- A customer must either receive a partner service appropriate to their needs, applied for such service, or made a firm appointment to receive services during their visit. Customer information gathered at the customer's initial visit should not be asked for during subsequent visits.
- Access to Job Center services should be made available in each county as part of the Job Center's business plan. The NPWDB, Inc. may define the type and level of service access required.
- The NPWDB, Inc. may issue a provisional charter if it is determined that a Job Center Operator does not meet the criteria and guidelines for full chartering. Once the guidelines and/or criteria are met, the NPWDB, Inc. may issue a full charter.
- The NPWDB, Inc. may issue a charter for up to two (2) years. Subsequent charters may be issued by NPWDB, Inc. to the same Job Center Operator based on an evaluation of the overall performance. To be considered for re-chartering, a Job Center Operator must 1) develop a new business plan; 2) meet or exceed the performance goals and chartering criteria established by the Board; and 3) have operated without significant auditing/monitoring exceptions, and met minimum performance indicators.

Steps to Charter an American Job Center:

Prior to issuing a charter, the NPWDB, Inc. is charged with confirming that federal, State and local criteria have been met. Chartering is the result of the steps that the NPWDB, Inc. has taken in coordination with the Job Center Operator to make certain that a Job Center meets established standards and requirements. The NPWDB, Inc. may take the following actions prior to issuing a charter:

1. The NPWDB, Inc. establishes its vision for the American Job Center one stop system in the region.
2. The NPWDB, Inc. establishes the local chartering process and chartering criteria in consideration of the state vision.
3. The NPWDB, Inc. selects the Job Center Operator.
4. The NPWDB, Inc. requires development of a business plan by Job Center Operator as application for chartering.
5. The NPWDB, Inc. reviews business plan and conducts site visit.
6. The NPWDB, Inc. issues charter or provides correspondence to Job Center Operator on deficiencies.
7. If charter is issued, the NPWDB, Inc. informs the Workforce WV Office.

Provisions for Terminating a Charter:

A termination of a charter can occur only after the NPWDB, Inc. has worked with the Job Center Operator to develop a corrective action plan and/or through the provision of technical assistance. Termination of a charter may occur for the following reasons:

- Job Center Operator fails to meet performance expectations for consecutive years;
- Failure of a required partner to participate in an MOU;
- Failure to gather required information for quality assurance and continuous improvement; or
- Other reasons as determined by the NPWDB, Inc.

Charter Checklist

The following is a list of key items the NPWDB, Inc. will examine and/or consider in determining a Job Center Operator/ Job Center's readiness for chartering:

- Are the Job Center Manager, and staff knowledgeable of the business plan? Does it include and market the service delivery strategy? Has a customer satisfaction baseline been established? Is there a plan for staff development and cross training? Is the financial plan in place and does it consider future sustainability? Are outcome measures established?
- Have required partners co-located on site and are providing Career Services? Does the site feel welcoming and customer-friendly? Is there a greeter/receptionist present and able to provide assistance?
- Is there a functioning Resource Room/Area in place with internet access? Is staff trained to assist customers? Are adequate computers available for customers and staff?
- Are Career Services from the required partners available to customers? Are Training Services and information available to customers? Is there a referral system in place among service providers and programs?
- Is the site layout professional and business-like? Is site easily accessible with convenient parking and public transportation? Is the site in compliance with ADA?
- Is Job Center staff assessing skill levels of customers? Does staff understand the one stop vision and concept? Has cross training been conducted for staff?
- Is there a Cost Allocation Plan developed and in place? Have MOUs between the Job Center Operator, NPWDB, Inc. and all required partners been executed?
- Is the management structure defined? Is an organization chart in place? Has the Job Center Manager been named? Do the Job Center Operator/Required Partners appear to be working as a single entity?

Business Plan Formant

A certain format is to be used when developing a business plan by a Job Center Operator/Required Partners applying for chartering status from the NPWDB, Inc. The questions are designed to ensure comprehensive thinking about the center(s) and its planning. These questions are designed to prompt teams to think strategically about what they are launching. These are the minimum guidelines that must be included in a business plan.

I. DEFINING THE BUSINESS

How will Job Centers benefit customers?
 What are Job Centers' primary business objectives?
 What are Job Centers' visions and missions in the community?

II. DEFINING RELATIONSHIPS AND ROLES

Who is the Job Center Operator?
 What is the role and responsibility of the Job Center Operator?
 What is the role and responsibility of the fiscal agent in relation to Job Centers?
 What are the role and responsibilities of partners at Job Centers?

III. PARTIES TO AGREEMENTS/MOUs

Who has been designated as the contact person(s) and/or signatory(ies) for the Job Center Operator?

IV. PRODUCTS AND SERVICES TO BE PROVIDED

What types of Career and Training Services will be available at Job Centers?
 Which required partners will deliver and provide what services?
 What Career and Training Services will only be accessible through the internet at

Job Centers?

How will information be shared between required partners at Job Centers?

How will Job Centers ensure compliance with ADA to ensure accessibility for special population customers?

V. LINKAGE BETWEEN OPERATOR AND REQUIRED PARTNERS

What are the technology needs of Job Centers?

What are Job Center sites, service delivery, structure, service mix and customer flow?

What is the systematic approach for referral of customers who need services?

How will customers be referred between Job Centers and partners' agencies?

How will customers receiving services move through Intake, Enrollment and Assessment/Eligibility Services?

What efforts will be taken to ensure that shared responsibility exists for coordinating employer contact for job orders and job development activities?

VI. MEASURING SUCCESS

What are the quality standards for services that will be provided to customers?

What are the standards for services that will be provided to employees? (ie: to work in a safe environment, receive tools necessary to achieve desired outcomes, etc.) What are the standards for required partners? (ie: Provide job seeker referrals, provide services to employers within 48 hours, increase number of job vacancy postings and new employer contacts by 5% per year, etc.)

VII. MARKETING PLAN

How will products and services be marketed targeting job seekers?

How will products and services be marketed targeting employers?

What parties will have input into marketing efforts?

What will be the frequency of marketing efforts?

What special events will be coordinated for job seekers?

What special events will be coordinated for employers?

VIII. FINANCIAL PLAN

How will operating and infrastructure costs be assessed?

Who is responsible for fronting costs of the system?

What is the payment process? How often?

What mechanisms of payment for partners' fair share/negotiated share of costs for Job Centers are in place?

IX. MISC PROVISIONS

Have all required partners agreed that Job Center system will be their system of record used as the common data repository for WIOA activities?

Have all required partners signed a cost sharing agreement?

Have all required partners agreed to enter all clients into system?

Will required partners share job openings and employer information?

Have all required partners agreed to treat data in system as confidential?

Have all required partners agreed to respect each other's organizational practices and management structure in the provision of services?

Have all required partners agreed that they will not discriminate in their employment practices or services?

X. TERMS OF MOUS

What circumstances would constitute a breach of a cost sharing agreement?

If a breach results, at what point will it be rendered null and/or void?

What is the impasse resolution for the cost sharing agreement?

Effective date(s) of business plan?

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 37

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Follow-Up Services for WIOA Participants

Follow-Up Services are to be provided to every Adult and Youth participating in a NPWDB, Inc. WIOA funded program and/or service. Hard copy documentation that supports Follow-Up Services have been provided to participants must be maintained in his/her file.

Follow-Up Services are to be provided to Youth following his/her exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-Up Services for Youth may include: Leadership development opportunities and Supportive Services activities; Regular contact with a Youth Participant's employer, including assistance in addressing work-related problems that may arise; Assistance in securing better paying jobs, career pathway development and further education or training; Work-related peer support groups; Adult mentoring; and/or, Services necessary to ensure the success of Youth Participants in employment and/or post-secondary education.

Youth Training Program Provider(s) are to make a copy of supporting documentation showing that Follow-Up Services had been provided to each Youth Participant prior to providing said information, data, etc. to the NPWDB, Inc. for input into the MACC system.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 38

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: WIOA Participant's Income Verification

A hard copy of supporting documentation (ie: pay stub, W-2 form, etc.) for a participant's income verification is to be maintained in his/her file.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 39

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Access to the MACC System in Region 5

The MACC (Mid-Atlantic Career Consortium) system is the approved participant data entry system in the State of WV. The MACC system tracks activities, services, etc. of participants and job seeker and employer customers registered at American Job Centers. As such, it is vital that participant/customer activities, services, etc. are entered into the MACC system properly, accurately and timely by staff.

Below is the process/procedure used by NPWDB, Inc. staff, training provider staff, American Job Center staff and required partners staff requesting access to the MACC system in Region 5:

Step 1 – Staff makes initial request for access to the MACC system with the NPWDB, Inc.’s MACC Coordinator.

Step 2 – The MACC Coordinator schedules an in-person meeting with staff requesting MACC system access. During this meeting, staff requesting MACC system access completes the Workforce WV Office’s MACC Access Request Form and the MACC Confidentiality Agreement Form. The MACC Coordinator is responsible for determining what level of MACC system access will be granted to staff making the request. Once both Forms are completed, they are then sent by the MACC Coordinator to the Workforce WV Office’s MACC Team, via fax, within three (3) days of completion of necessary Forms. Original, hard copies of both Forms will be maintained on file at the NPWDB, Inc. Office by the MACC Coordinator.

Step 3 - The Workforce WV Office’s MACC Team will send written verification to the MACC Coordinator of the person(s)’s password/passcode, either by fax, letter or email. The MACC Coordinator will then forward staff making the request for access to the MACC system,

his/her password/passcode in writing either by fax, letter or email.

The Job Center Manager will be responsible for immediately notifying, in writing, the MACC Coordinator if anyone with MACC access has left his/her employment at a regional Job Center. The NPWDB, Inc. Executive Director will be responsible for notifying the MACC Coordinator if anyone with MACC access has left his/her employment at the NPWDB, Inc.'s administrative office. If so, the MACC Coordinator will be responsible for immediately notifying, in writing, the Workforce WV Office's MACC Team requesting the prompt termination of the password/passcode of the person(s) no longer associated with a regional Job Center or the NPWDB, Inc. administrative office. The Workforce WV Office's MACC Team will be required to send written notification back to the MACC Coordinator verifying the termination of password/passcode in question.

Should the MACC Coordinator not be available to complete any of the above- detailed process for whatever reasons (ie: out of office, on vacation, etc.), it will then be the responsibility of the NPWDB, Inc.'s Executive Director to do so. No other individual either at a regional Job Center or at the NPWDB, Inc.'s administrative office will be permitted to either grant, or stop/terminate, any other individual's access to the MACC system.

In addition to the duties, responsibilities, etc. already outlined in this policy, the MACC Coordinator will also be responsible for carrying out the following additional tasks as related to the coordination and oversight of the regional MACC system.

- Monitor, track and review all regional data entry into the MACC system on a regular and consistent basis so as to ensure compliance with all applicable rules, requirements, etc. for WIOA programs. This includes developing monitoring and tracking forms for regional use.
- Assist in preparation of state, federal and local reports which include findings, recommendations and deadlines for corrections.
- Verify MACC system/MIS regional data provided from the Workforce WV Office is accurate and correct.
- Provide ongoing training and technical assistance to all staff (ie: Customer Career Planners/Data Control Coordinators, etc.) who are responsible for entering all necessary and required customer data into the MACC system.
- Complete an internal, informal customer file validation review in the region. (Each program year, the Workforce WV Office initiates a customer file validation review. So, prior to this validation review, the MACC Coordinator, along with two (2) NPWDB, Inc. administrative staff members and two (2) Job Center Operator staff members, performs an internal, informal customer file validation review. This internal, informal validation review is completed by no later than the end of the second quarter of a program year. The review team will use the same validation tools as the Workforce WV Office does during their formal validation review).
- Enter, track and validate all performance data for the region. (The region's performance outcomes of common measures rest, for the most part, on the accuracy of data entry into the MACC system by local Customer Career Planners/Data Control Coordinators under the supervision and guidance of the MACC Coordinator. Only the MACC Coordinator has the responsibility of entering, tracking and validating performance data for the region).
- Participate in the Workforce WV Office's MACC Focus Group. (This Group addresses issues, concerns, updates, etc. to the statewide MACC system).

The NPWDB, Inc. will adhere to all policies and procedures set by the Workforce WV Office with regard to MACC system access, data entry, etc. (MACC Guideline Handout). And, MACC Team member(s) are to continue to receive updates on assigning customer activities, services, etc. within the MACC system as changes continue to evolve.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 40

Date: September 16, 2015

Effective Date: September 16, 2015; Modified Date: March 6, 2017

Subject: Follow-Up Services for WIOA Participants

Follow-Up Services are to be provided to every Adult and Youth participating in a NPWDB, Inc. WIOA funded program and/or service. Hard copy documentation that supports Follow-Up Services have been provided to WIOA participants must be maintained in his/her file. Follow-up services for both Adult and Youth must occur for no less than twelve (12) months.

Follow-up Services are to be provided to Adults following his/her exit from a WIOA funded program to help ensure Adults are successful in employment and/or education or training. Follow-Up Services for Adults may include: Employer contact and verification; Phone contact with the Adult participant; and, Written correspondence to the Adult participant with employer verification to follow.

Job Center Staff and/or Customer Career Planners/Data Control Coordinators are to make a copy of supporting documentation showing that Follow-Up Services have been provided to each Adult Participant prior to providing said information, data, etc. to the NPWDB, Inc. for input into the MACC system.

Follow-Up Services are to be provided to Youth following his/her exit from a WIOA funded program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-Up Services for Youth may include: Leadership development opportunities and Supportive Services activities; Regular contact with a Youth Participant's employer, including assistance in addressing work-related problems that may arise; Assistance in securing better paying jobs, career pathway development and further education or training; Work-related peer support groups; Adult mentoring; and/or, Services necessary to ensure the success of Youth Participants in employment and/or post-secondary education.

Youth Training Program Provider(s) are to make a copy of supporting documentation showing that Follow-Up Services had been provided to each Youth Participant prior to providing said information, data, etc. to the NPWDB, Inc. for input into the MACC system.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 41

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Maintenance of Participant Files

All participants files transported to/from the Wheeling American Job Center (Workforce WV Career Center) will be tracked on a daily basis.

The staff member transporting/moving/taking a participant file(s) from one Job Center to another, must first complete the appropriate following Participant File Tracking Form(s). Then, the staff member receiving the participant file(s) (at another Job Center site location) will sign off that he/she received the participant file(s), document the date participant file(s) were received, specify the location/area where the participant file(s) will be maintained (i.e. front file room, youth file cabinet, basement, etc.), etc.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 42

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Participation In the "Work Readiness" Program

Participants accepted into the Region's ITA Program will be required to attend the "Work Readiness" Program prior to their enrollment into an ITA Training Program/while they are waiting on our ITA Program Waiting List.

Adult and Dislocated Worker ITA Participants will be required to attend "Work Readiness" Program at all regional American Job Centers (Workforce WV Career Centers). Incumbent Workers and Individuals who have attended, or are attending, a SPOKES Program are excluded from participation in the "Work Readiness" Program. "Work Readiness" Programs will be offered no less than one (1) time per a week at each regional American Job Center.

The Process/Procedure for referral to the "Work Readiness" Program is:

- 1) Job Center Staff will refer all Adult and Dislocated Worker ITA Program Participants who have already been registered in the MACC system for participation in one of the region's "Work Readiness" Program;
- 2) Adult and Dislocated Worker ITA Program Participants will be pre-tested either by Job Center Staff or by the "Work Readiness" Program Instructor prior to their first day of attendance in a "Work Readiness" Program. (Pre-test should be given at intake after WIOA eligibility is determined);
- 3) Once the Adult and Dislocated Worker ITA Program Participant have successfully completed the "Work Readiness" Program, he/she is to be Post-Tested. The Post-Test is to be administered by either Job Center Staff or the "Work Readiness" Program Instructor. If Post-Test Scores increase by no less than ten percent (10%), a Work Readiness Certificate will be issued to the Adult or Dislocated Worker ITA Program Participant. The Certificate will be signed by the "Work Readiness" Program Instructor and NPWDB, Inc. Staff. Should Work Readiness Scores not improve by at least ten percent (10%)* as evident by the Pre/Post-Test, the Adult or Dislocated Worker ITA Program Participant will be provided with additional Work Readiness Training and be Post-Tested one more time. Should Work Readiness Scores not improve for the second time, the Adult or Dislocated Worker Program Participant will be referred to the appropriate Partnering Agency(ies) for even more Work Readiness Training);

4) Job Center Staff will then make a copy of the Certificate and assign the Adult or Dislocated Worker a “Work Readiness” Service in the MACC System. Additionally, Job Center Staff will enter a Case Note for MACC tracking purposes;

5) Original copies of the Pre and Post-Tests are to be maintained in the Adult or Dislocated Worker ITA Program Participant’s file; and,

6) A copy of the Pre and Post-Test is to be provided to the NPWDB, Inc. MACC Coordinator, who will be responsible for tracking and MACC outcomes.

* Should an Adult or Dislocated Worker ITA Participant score a 100% on his/her Pre-Test, this individual does not need to be Post-Tested. This individual will still be required to view the video – “Ready for Work: Qualities That Count with Employers.” This individual will be given a Certificate of Achievement.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 43

Date: *September 16, 2015; Modified Date: November 8, 2021*

Effective Date: September 16, 2015

Subject: Participant Orientation/WIOA Eligibility/Registration Process

The Process for Participant Orientation, WIOA Eligibility and Registration will be as follows:

- A. A Participant will complete an Orientation and schedule an appointment with a Job Center Staff to determine his/her WIOA eligibility.
- B. At the appointment to determine WIOA eligibility, the following Steps need to be adhered to:
 - 1. Verification of WIOA eligibility. (If a participant does not have all of the necessary documentation, etc. that is required/needed to determine WIOA eligibility, the appointment is to be rescheduled and the Job Center Staff is not to proceed any further. (No MACC Entry or Intake Forms are to be completed at this stage).
 - 2. If and once WIOA eligibility is verified/confirmed, the participant is to be TABE-tested and the SDS Test is to be administered. (No MACC Entry is to occur at this stage).
 - i. The participant is to be provided with his/her ITA. Job Center Staff is to advise the participant that he/she must contact you to and make another appointment so the Participant can return his/her ITA. Job Center Staff is to remind the Participant that his/her ITA needs to be returned within thirty (30) days from receipt.
 - ii. At ITA return appointment, these steps need to be followed:
 - a. Job Center Staff is to contact the Assistant Director of the NPWDB, Inc. to ask "Is WIOA funding available for the Participant's ITA?"
 - b. Job Center Staff needs to contact the participant's school of choice to ask "Is a classroom slot(s) available for the participant?"
If the answer(s) is "No" to either or both of these questions, Job Center Staff is to advise the participant that he/she will be placed on a Waiting List until WIOA funding and/or a classroom slot(s) becomes available. The participant will be contacted at that time.

If the answer(s) is “Yes” to either or both of these questions, Job Center Staff will: Enter participant’s WIOA eligibility into the MACC; Register participant into the MACC; Enter participant’s TABE test scores into the MACC; complete participant’s intake paperwork; and, Complete participant’s IEP in MACC. The participant is to provide his/her signatory on all necessary/required Documents/Forms/Etc.

Job Center Staff is to detail all participant follow-up in Case Notes on MACC. If necessary, Job Center Staff needs to continue follow-up thereafter.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 44

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Training Provider Report Card Policy

A Training Provider Report Card is to be developed for each Training Provider offering WIOA funding Programs. Each Report Card will include information pertaining to each approved, offered individual Training Program in the Region, such as: Number of Years in Business; Facility Location(s); YTD Enrollments; Participant Completion Rate; Average Employment Rate; Average Wages, etc.

Data/Information for Report Cards is to be obtained through the MACC System, by the individual Training Provider(s), etc. Job Center Operator Staff will be responsible for obtaining all required data/information in order to accurately complete Report Cards.

Training Provider Report Cards are to be kept in a binder at each regional American Job Center and are to be made available to the public (Any individual/participant researching approved, offered WIOA funded Training Programs in the Region). Each Job Center Operator Staff and Job Center Staff Member is to be provided with a copy of the Training Provider Report Card binder. Additionally, Report Cards for all approved Training Providers in the Region are to be publically displayed at each American Job Center.

An overall ranking scale for each Training Provider is to be developed based on Average Percentages provided for each individual Training Program. This will include the sum of the Participant Completion Rate and the Average Participant Employment Rate divided by 2, and will be based on a scale of 1-10, with 1 being the lowest and 10 being the highest. (For example, if the Participant Completion Rate is 83% and the Average Participant Employment Rate is 96%, the overall ranking of that Program will be a "9").

The Job Center Manager will be responsible for ensuring that Report Cards are updated as required and distributed to each appropriate Staff Member/Job Center. Training Provider Report Cards are to be updated no less than two (2) times per program year by Job Center Operator Staff.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 45

Date: September 16, 2015

Effective Date: September 16, 2015

Modified Date: November 24, 2015

Subject: Policies and Procedures Governing Youth Programs and Services

A comprehensive strategy is in place in the region that details how we provide effective Programs and Services to our Region's WIOA eligible Youth. The strategy encompasses: Solid Career Planning, Case File Maintenance and Case Note Practices; Well-Developed IEP'S/ISS's for participating youth; Extensive Follow-Up Services; The delivery of quality Programs and Services to Youth Participants; and, Performance Management. Our Job Center Staff and NPWDB, Inc. MACC Coordinator are largely responsible for the development/delivery of all of these functions/duties.

CAREER PLANNING PRACTICES

Our Career Planning Services involve assessing and interpreting the needs of Youth Participants; Developing strategies to help them reach their educational, training and employment goals; Providing the necessary tools and resources to help them overcome personal barriers; Documenting any referrals, outcomes, service decisions, etc.; Summarizing any and all individualized meetings and achievements; Performing Follow-Up Services, etc.

Each Participating Youth has a Case File that details information on Basic and Occupational Skills, Work Experience, Interests, Supportive Services needed, Assessment Results, Eligibility documentation, Case Notes, Follow-Up, etc. Case Notes are used to manage and support a Youth Participant's progress. In an effort to determine which services need to be provided to a Youth Participant, information is gathered from multiple sources, including observations and personal interviews, career interests, formal assessment tools, strengths/weaknesses, etc. Services offered have to be effective and flexible enough to meet the needs and employment goals of the Youth Participant.

Contact letters and receipt of grades, certification or transcripts received from Training Providers is not Career Planning. These occurrences are to be entered in the "Case Notes Only." Career Planning is the "hands on" guidance of a Youth Participant from the Point of Registration through training and into employment and any one-on-one contact during this process. Services must be provided and assigned in the MACC system for the registered Youth Participant until sufficient employment is attained. As services are provided and Referrals are made, the Youth Participant's IEP/ISS will need to be updated. Follow-Up on referrals are to be made within 30 days of making the referral.

Job Center Staff is responsible for providing Career Planning Services until a positive outcome is

achieved. If a Job Center Staff has any questions on defining a Service, they are to ask the NPWDB, Inc. MACC Coordinator for clarification. It is imperative that all services are documented in the MACC System.

Any Youth enrolled in a WIOA Program or Service must be a citizen of the U. S. or authorized to work in the United States and registered with Selective Service if male, over 18 years of age and born on or after January 1, 1960. Applications for Youth in a WIOA Program or Service must be signed by a parent or guardian for anyone under the age of 18.

Job Center Staff will copy all required documentation for the Youth Participant's file. If the youth participant does not have all required/necessary documentation items, he/she must reschedule their appointment after all of the required/necessary documentation has been acquired. Documentation items include:

1. Birth Certificate or Citizenship Documentation.
2. Social Security Card for the Youth Participant and every Member of the Household.
3. Valid Driver's License or State issued Photo ID.
4. Utility Bill, Rent Receipt or other Proof of Residency only if the Youth Participant's current address is not on the Valid ID.*
5. Selective Service for all Males born after December 31, 1959.
6. Proof of Public Assistance being received.
7. Household Income for the past six months. *
8. Proof of Child Support Payments.
9. Completed Job Search Log Form Orientation.
10. Unemployment Verification, when applicable.
11. Veteran Status – If a Youth Participant is a Veteran, he/she MUST provide their DD214.
12. Disability Status, if documentation is available.
13. Youth Participants (Older Youth Participants) MUST apply for a Pell Grant when the Training Program is applicable for Student Aid. A confirmation that the Youth Participant applied must be kept on file for every Program Year that they are in Training.

*Residency proof must match what is on the eligibility screen in the MACC. If residency address changes between application and registration it must be case-noted. Proof must be provided for both addresses.

* If the Youth Participant is unemployed at the time of participation, and not receiving unemployment, an Applicant Statement needs filled out. The Applicant Statement should state that the household has no income and state means of survival, paying utility bills, rent, etc. The Youth Participant is still required, however, to have documentation of income for the past six (6) months, if applicable.

After a Youth Participant is registered, Job Center Staff will meet with the Youth Participant no less than once a month up until training is completed to find out: The status of full-time training, GPA, grades, if the Youth Participant is on track to complete training, if there is any reason(s) for a status change, etc. Job Center Staff need to assign the Status Update Service for the appropriate Funding Stream – Youth. A Case Note must also be entered when assigning this service. This service is to have the status of “Completed”. Once training has been completed, when Job Center Staff talk to the youth participant on the phone, see them in person, etc., a Follow-Up Service must be assigned for the Funding Stream - Youth. Neither the Status Update Service nor the Follow-Up Service should affect the Exit Date. These 2 services are used to distinguish before/after training.

TABE TESTING Out-of-School Youth:

PRE-TEST: Pre-Test can be given during Intake, 6 months prior to Registration Date and/or within sixty (60) days after Registration Date.

POST TEST #1:

If the Youth Participant was determined “Basic Skills Deficient” as a result of the Pre-Test Scores, a Post-Test is required. This Test must be given within one (1) year from the date of the first Youth Service assigned. If the Youth Participant was deficient on the Pre-Test in both subjects, he/she must be tested in both subjects, even though you may tutor only in one subject. If the Youth Participant was deficient in only one subject, then you only test in that subject.

If Post-Test results in youth participant becoming non-deficient, no more testing is needed, unless Youth Participant exits and registers again.

If Post-Test results in Youth Participant still being deficient, then a 2nd Post-Test must be given within one (1) year from Post-Test #1.

POST TEST #2:

If a Youth Participant was determined “Basic Skills Deficient” as a result of Post-Test#1, then this Test is required. If Post-Test #1 indicates “Basic Skills Deficiency,” then this Test must be given in the subject(s) that are deficient.

If Post-Test results in the Youth Participant becoming non-deficient, No more Testing is needed, unless the youth participant exits and registers again.

If Post-Test results in Youth Participant still being deficient, then a 3rd Post-Test must be given within one (1) year from Post-Test #2.

POST TEST #3:

If the Youth Participant was determined “Basic Skills Deficient” as a result of Post-Test #2, then this Test is required. If Post-Test #2 indicates “Basic Skills Deficiency,” then this Test must be given in the subject(s) that are deficient.

Regardless of the results of this Post-Test, no further Testing is needed unless the Youth Participant exits and registers again. This is due to the fact that the Literacy/Numeracy Performance Measure is only counted for the three (3) years.

When an Older Youth Participant wants to participate in the ITA Program but is unclear which Training Program he/she wishes to attend, Job Center Staff should advise them to research the Training Programs/Providers and Local Labor Market Information to make an informed decision; then reschedule an appointment to discuss results. Youth Participants can also review Training Provider Report Cards that are available at regional American Job Centers (Workforce WV Career Center).

IEPs/ISSs

Each Youth Participant has an IEP/ISS developed for him/her. The IEP/ISS is placed/maintained in the Youth Participant’s file, with a copy provided to the Youth Participant. The IEP/ISS represents an individualized plan for each Participating Youth that includes: An Employment Goal; Appropriate Achievement Objectives, including Educational Goals; and, Appropriate Services that take into account what is learned from the Objective Assessment. The IEP/ISS is reviewed and updated on an ongoing and regular basis with the Youth Participant. The IEP/ISS is used to update strategies and activities as they occur and/or change and to document referrals and contact information for Services obtained. In the IEP/ISS, a Participating Youth’s progress is charted, activities completed, benchmarks reached and any other accomplishments. The IEP/ISS is developed and modified between Job Center Staff and the Youth Participant. Achievements are documented in measurable and attainable short-term and long-term

goals that reflect the Youth Participant's interests and incorporates Career Pathway Planning.

For Out-of-School Youth Participants, the IEP/ISS must show documentation of the following information: Age of Older Youth (16 -24 at the time of enrollment and not attending any school as defined under State law); and, one (1) or more of the following barriers:

- A School Dropout which is to be verified at the time of WIOA youth program enrollment.
- 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. School calendar quarter is based on how a local school district defines its school year quarters;
- A recipient of a secondary school diploma or its recognized equivalent who is low income and is either is basic skills deficient or an English language learner;
- An individual who is subject to the juvenile or adult justice system;
- A Homeless individual as defined in Section 41403 (6) of the Violence Against Women Act of 1994, a homeless child or youth as defined in Section 725 (2) of the McKinney-Vento Homeless Assistance Act, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under Section 477 of the Social Security Act or in an out-of-home placement. An individual who is pregnant or parenting;
- An individual with a disability; or,
- A low income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

*** Please note, only those Out-of-School Youth who are the recipients of a secondary school diploma or its recognized equivalent and are either basic skills deficient or an English language learner and who require additional assistance to enter or complete an educational program or to secure or hold employment must be low income. All other Out-of-School Youth meeting out-of-school eligibility are not required to be low income.

If an Older Youth Participant, ages 18-24, knows that he/she wants to attend a Training Program (ie: the ITA Program), the following must be done:

- Completion of the IEP/ISS. (Paper Form). Assessment of needs is done at this point by Job Center Staff asking questions on this IEP/ISS regarding barriers, and if services are needed, referrals are made at this time to appropriate Agency or Agencies.
- Have him/her do an SDS (Self Directed Search Test).
- Give Older Youth Participant an ITA Program Packet to complete and to take to the Training Provider for final completion. The ITA Program Packet needs to be returned to Job Center Staff within thirty (30) days from the Intake Date, or the Older Youth Participant will need to resign everything, basically starting over. Stress the importance of returning required information within thirty (30) days. A Youth Participant needs an appointment to return the ITA to Job Center Staff and to sign the MACC IEP/ISS.

When the ITA is returned, the Older Youth Participant will need to be registered. The Registration Date should be the same as the Intake Date. Then, required/necessary information will need to be entered from the paper IEP/ISS into the MACC IEP and a copy must be printed for the Older Youth Participant to sign. The Start Date for the MACC IEP/ISS should match the Registration Date and should have an estimated End Date of 3 years out, or the Maximum Date that the MACC system will allow. As modifications are done, the IEP/ISS will need updated in the MACC system, however the Older Youth Participant only needs to sign the original IEP/ISS and it should remain in the Older Youth Participant's File.

For In-School Youth Participants, the IEP/ISS must show documentation of the following information: Age of Youth (14 -18) at the time of enrollment; and, one (1) or more of the following barriers:

- Attending school as defined by State law including secondary and post- secondary school;
- Not younger than age 14 (unless it is an individual with a disability who is attending school under State law) and not older than age 21 at the time of enrollment;
- A low income individual and is one (1) or more of the following:
 - Basic skills deficient.
 - An English language learner.
 - An offender.
- A Homeless individual as defined in Section 41403 (6) of the Violence Against Women Act of 1994, a homeless child or youth as defined in Section 725(2) of the McKinney-Vento Homeless Assistance Act, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under Section 477 of the Social Security Act or in an out-of-home placement.
- An individual who is pregnant or parenting.
- An individual with a disability.
- An individual who requires additional assistance to complete an educational program or to secure or hold employment

FOURTEEN (14) PROGRAM ELEMENTS

The NPWDB, Inc. and its Youth Provider must make the fourteen (14) Program Elements available to Youth Participants. It will be at the discretion of the NPWDB, Inc. and its Youth Provider to determine what specific Program/Service(s) will be provided to a Youth Participant based on his/her Objective Assessment and IEP/ISS (However, every Youth Participant is to receive Follow-Up Services). The NPWDB, Inc. and its Youth Provider do not have to use WIOA funds to provide all fourteen (14) Program Elements and instead may rely on partner programs to provide some of the program elements, if such services are available for eligible Youth Participants in the region. Regardless, the NPWDB, Inc. and its Youth Provider will ensure that Youth Participants have access to the programs and services needed that will successfully lead them to post-secondary education and/or employment. Programs and services will be individually tailored to a Youth Participant's needs.

PROGRAM PERFORMANCE

The MACC system is the data entry system used to track activities of registered American Job Center (Workforce WV Career Center) Youth Participants and program performance. So, it is vital that services, activities, data, etc. entered into the MACC system are accurate, done in a timely manner, etc. in order for our region to meet required Common Measures. If services, etc. are not entered into the MACC system properly, our region's performance, and partners' performance, will be negatively affected.

Data needs to be entered into the State MIS system, the MACC, under the appropriate Program - Youth. A referral that is assigned will be started and completed with the same date. Assessment and registration services should be assigned and the status completed for the Youth Participant. The service date should be the date the Youth Participant signs his/her paperwork. Then, a detailed note should be entered in the notes folder, and a reminder can be created, if necessary.

All Youth Participants must have raw scores (3 digit numbers) entered into the MACC system. In-School Youth Participants are to be entered under "Shared Assessment," Out-of-School Youth Participants are to be entered in the "OSY Assessment Folder." Job Center Staff is to only enter the Pre-Test Scores for Youth Participants. The NPWDB, Inc. MACC Coordinator will enter all Post-Test Scores for In-School and

Out-of-School Youth Participants. All Out-of-School Youth Participants who are “Basic Skills Deficient” must be Post-Tested because they are included in the “Literacy-Numeracy Common Measure for Performance.” Youth Participants who enter the Year-Long Program with the region’s Youth Provider will be Post-Tested by the Youth Provider. Older Youth Participants who are only attending the region’s ITA Program must be Post-Tested by Job Center Staff. Short-Term ITA Program Youth Participants should be Post-Tested within thirty (30) days of Pre-Test. Long-Term ITA Program Youth Participants should be tested within sixty (60) days of Pre-Test. It is the Job Center Staff’s responsibility to inform the Youth Participant about testing.

All Youth Participant registrants not receiving a service or not having a service “In Progress” in the MACC system for a ninety (90) day period of time will be automatically exited by the MACC system, therefore affecting performance.

The performance outcomes of Common Measures will fall upon the accuracy of each Job Center Staff’s job performance and data entry into the MACC system.

Any registered Youth Participant that has decided to obtain employment or has completed training must meet with their Job Center Staff Member. The Job Center Staff Member for the Youth Participant will be required to assign the services to the Youth Participant to overcome remaining barriers to employment.

All programs and/or services are to be accurately entered into the MACC system and documented on the IEP/ISS. All Participating Youth will be assigned “Comprehensive Guidance and Counseling.” The only service that should have a status of “In Progress” for the Youth Participant is “Comprehensive Guidance and Counseling.” The estimated start date and the actual start date will be the same as the registration date. The estimated end date will be one (1) year out and the actual end date will be left black and the status is “In Progress” for this service. This service will only be completed by the MACC Coordinator. If these services are not assigned as “In Progress” when registering Youth Participants, the Youth Participant will be soft-exited. The proper way to assign “In Progress” for these services is to keep the estimated start date and actual start date the same day that the IEP/ISS has been started, change the estimated end date to one (1) year from the estimated start date and leave the actual end date blank, then use the Drop Down Menu to assign the service as “In Progress.” Assessment and testing services are always to be assigned as “Completed.” Case Notes alone will not prevent someone from being soft-exited. (Remember, if a Youth Participant is registered, Job Center Staff is responsible for providing Career Planning services until a positive outcome is achieved.

Also, when services have not been provided for an extensive period of time or if a Youth Participant notifies a Job Center Staff Member he/she is no longer interested in training, please ensure this information gets forwarded to the MACC Coordinator so the Youth Participant can be exited.

Job Center Staff will receive updates on assigning services in the MACC system as changes continue to evolve.

Upon completion of training, a Job Center Staff Member is to obtain verification of Certification or Degree, such as final Transcript, Diploma, Certificate, etc. A copy of the verification is to be put into the Youth Participant’s Folder and a copy is to be provided to the NPWDB, Inc. Assistant Director and/or the MACC Coordinator. (One copy to the NPWDB, Inc. Office is sufficient). Job Center Staff Members are to diligently follow-up with the Youth Participant on a regular basis. If the Youth Participant obtains employment, Job Center Staff will need verification through check stub copies or employer contact (W-2 forms cannot be used as verification due to lack of employment dates). This process of contact must be maintained through 1 quarter after completion of training. If the Youth Participant cannot be reached and all resources have been exhausted, the NPWDB, Inc. MACC Coordinator will then request wages from the Workforce WV Office and continue follow-up from that point. The NPWDB, Inc. MACC Coordinator can request Job Center Staff assistance if needed. If the Youth Participant remains

employed through the 1st quarter after completion of training, notification must be provided to the NPWDB, Inc. MACC Coordinator. The MACC Coordinator will then complete the necessary services to exit the Youth Participant. The MACC Coordinator will also enter information into the “Outcomes” Folder in the MACC system. The “Outcomes” Folder is where performance data information is extracted from. Job Center Staff will be provided a list of files periodically that they are responsible for validating. The MACC Coordinator will create this list. Job Center Staff is to assign a follow-up service, when they do follow-up contacts, etc.; only after training has been completed, cancelled, etc. Job Center Staff need to enter Case Notes for the follow-up service as well. Youth Provider Staff is required to do follow-up for a period of twelve (12) months following completion of the program, or June 30th. This follow-up will start in July and run through June of the next Program Year. Youth Provider Staff will need to assign the follow-up service and enter a Case Note for those Youth Participants who completed a prior year program, but did not re-enroll. For Youth Participants who were re-enrolled, the service that will be assigned each month is the WIOA Y- Status Update. A Case Note must be entered for these Youth Participants. Case Notes should state that Youth Participant re-enrolled in current year Program, doing well, etc.

FOLLOW-UP SERVICES

Follow-Up Services are based on the needs of the Youth Participant and includes tracking the progress of Participating Youth in employment after training. Regular contact is made with the Youth Participant to ensure he/she successfully continues in their place of employment or Post-Secondary Education. Youth Participants are assessed to determine if they need anything beyond regular contact/to determine if additional services are needed.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 46

Date: September 16, 2015

Effective Date: September 16, 2015

Modified Date: November 2, 2015; November

Subject: Transitional Job Program

Transitional jobs are “work-based” and “time limited” training experiences for WIOA eligible Adult and Dislocated Worker participants that are subsidized. They provide an individual with a work experience that takes place within the context of an employee-employer relationship in which the program provider generally acts as the employer and with an opportunity to develop important workplace skills.

Transitional jobs must be designed to establish a work history for the individual; demonstrate success in the workplace; and, develop skills that lead to entry into and retention in unsubsidized employment. Unlike the OJT Program, there is no requirement the employer has to retain the individual upon completion of the transitional job; however, retention, where appropriate, is preferred for the benefit of the worker and the employer.

Local WDBs may use up to ten percent (10%) of its combined total adult and dislocated worker funds to provide transitional jobs to eligible individuals.

The NPWDB, Inc. will reimburse the employer one hundred percent (100%) of the individual’s wage rate in the transitional job. Wage rate reimbursement to the employer will not include overtime, holidays, plant downtime or other events in which no training has occurred. The individual will earn the same comparable wage rate as other non-WIOA eligible individuals working in the same capacity and performing the same job duties with the employer. The individual will earn no less than ten dollars (\$10.00) per hour.

Transitional jobs will be developed in private-for-profit “high demand” sectors. No more than three (3) transitional jobs will be written per employer.

Transitional jobs must be combined with Career and Supportive Services. So, at a minimum, Transitional jobs must have the following three (3) components:

1. Paid Work Experience for the WIOA eligible participant working no less than thirty-two (32) hours per week for a three (3) month period;
2. Career Services must, at a minimum, include the following Services:
 - A Determination of WIOA eligibility.
 - Information on “High Demand” Industry Sectors.
 - Job Search and Placement Assistance.
 - Career Planning/Pathways.
 - Job Readiness Training.

- Initial and Comprehensive Assessment of Skills and Services needed.
- Individual Counseling and Mentoring.

3. Supportive Services must, at a minimum, include the following Services:

- Intensive Case Management Services.
- Job Coaching.
- In-depth Assessment Services that includes Disability Screening.

Transitional jobs will only be made available to individuals with barriers to employment that are “chronically unemployed” or have an “inconsistent work history.”

“Barriers to Employment” is defined as those who are:

- Displaced Homemakers.
- Low Income Individuals.
- American Indians, Alaska Natives, Native Hawaiians.
- Individual with Disabilities.
- Older Individuals (aged 55 and older).
- Ex-Offenders.
- Homeless Individuals.
- Individuals who are English Language Learners, Individuals who have Low Levels of Literacy and Individuals who face Cultural Barriers.
- Eligible Migrants and Seasonal Farmworkers.
- Individuals within Two (2) Years of exhausting Lifetime Eligibility under the SSA.
- Single Parents (include Single Pregnant Women).
- Long-Term Unemployed Individuals.

“Chronically Unemployed” or “Inconsistent Work History” is defined as those who have been:

- Unemployed for thirteen (13) weeks or longer; or
- Unemployed twenty-six (26) of the past fifty-two (52) weeks; or
- Have held at least three (3) or more jobs in the past fifty-two (52) weeks and are currently unemployed or underemployed.

Prior to participation in the Transitional Job Program, the participant must successfully pass the Workforce WV Investment System approved Drug Screening Test. (A participant must only drug screen test once throughout his/her period of participation in training). A negative/pass drug screening test result will be valid until the participant exits American Job Center (ie: Workforce WV Career Center) services. A participant will adhere to Workforce WV Guidance No. 15-12- Participant Drug Screening.

Should an individual request to participate in more than one (1) transitional job, the individual will complete a justification letter that clearly details the reason(s) why participating in an additional transitional job(s) would greatly help him/her further achieve a career pathways goal/objective.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 47

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Participant Case Notes

To ensure the region achieves “good performance” results each program year, Participant Case Notes must be entered into the MACC system on a regular and ongoing basis as follows:

- If a participant is waiting to be approved for training and/or enrolled in training, the Customer Career Planner/Data Control Coordinator must contact the participant no less than one (1) time per quarter. A Case Note of contact made with the participant is to be entered into the MACC system.
- If a participant’s training is put on hold/delayed for any reason(s), the Customer Career Planner/Data Control Coordinator must contact him/her no less than one (1) time per month. A Case Note of contact made with the participant is to be entered into the MACC system.
- If the participant’s training is completed, if the participant quits, if the participant is separated by the training provider or if WIOA funding has expired, the Customer Career Planner/Data Control Coordinator must contact the participant no less than one (1) time per month. A Case Note of contact made with the participant is to be entered into the MACC system.
- All youth participants (the youth provider’s youth participants as well as any other youth participating in regional programs and services) are required to have follow-up services for a twelve (12) month period following completion of any training programs/services. A Case Note must be entered no less than one (1) time per month at the time the follow-up/status update service is assigned.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 48

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Supportive Services/Needs-Related Payments

Supportive Services may be necessary to eligible individual participating in Title I Career or Training Services under the Workforce Innovation & Opportunity Act (WIOA). Supportive Services may be provided to an individual who cannot afford to pay for such services in order to participate in a Career or Training Program. Supportive Services may include: transportation, child care, dependent care, housing, and needs-related payments (available only to those individuals enrolled in Training Services).

Supportive Services may be WIOA-funded only when these services are not available through other agencies and the services are necessary for the individual to participate in Title I Career or Training Services. Documentation must be kept by American Job Center (Workforce WV Career Center) staff that a referral for like services was made in an effort to access other potential funding sources and that no other means of funding were either available or suitable so it was necessary to use WIOA funds.

WIOA-funded Supportive Services may be coordinated with other partnering agencies to ensure the delivery of the highest quality, most comprehensive services and to prevent duplication of resources and services. Documentation must be kept by American Job Center (Workforce WV Career Center) staff that a referral(s) for Supportive Services was made to a partnering agency(ies) in an effort to access other potential funding sources/services.

Documentation about the availability of Supportive Services in the local area, as well as referral(s) to any Career or Training activity, is a Core Service that can be provided to Adults, Youth (ages 18-24) and Dislocated Workers through the One Stop Delivery System.

NEEDS-RELATED PAYMENTS (NRP's): Payments designed to provide a participant with resources for the purpose of enabling them to participate in training services. These payments can help individuals meet their non-training expenses and help them to complete training successfully. A participant must be enrolled in a Training Program in order to receive these payments.

In order to receive NRP's,

Adults must meet all three (3) of the following requirements:

- 1) Be unemployed;
- 2) Not qualify for or have ceased to qualify for unemployment compensation; and,

- 3) Be enrolled in a program of training under WIOA.

Youth (ages 18-24) must meet all three of the following requirements:

- 1) Be unemployed;
- 2) Not qualify for or have ceased to qualify for unemployment compensation; and,
- 3) Be enrolled in a program of training under WIOA.

Dislocated Workers must meet the following requirements:

- 1) Be unemployed and have ceased to qualify for unemployment compensation or trade adjustment assistance under TAA or NAFTA/TRA and be enrolled in a program of training under WIOA by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a Dislocated Worker, or if later, by the end of the 8th week after the worker is informed that a short term layoff will exceed 6 months. (Participants with Extended Unemployment Benefits will not qualify for Needs-Related Payments until they have ceased to qualify for Unemployment Compensation); or
- 2) Be unemployed and did not qualify for unemployment compensation or trade adjustment assistance under TAA or NAFTA/TRA; and,
- 3) Be enrolled in a program of training under WIOA.

**NRP's will not be made to participants on sick, vacation or holiday leave and will be suspended during periods of earned income. Participants will have to re-qualify to start receiving NRP's again once the income ends.

Required Documentation for Needs-Related Payments (NRP's):

- A copy of a UI entitlement decision or confirmation of UI benefits being exhausted.
- A copy of training classes for each period of training (quarter, semester, etc.)
- Verification of enrollment/registration, participation, grades and completion of training classes. Participant must maintain a 2.0 GPA and full-time status to receive NRP's.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 53

Date: September 16, 2015

Effective Date: September 16, 2015; Modified Date: July 1, 2019

Subject: Co- Enrollment of Participants

Co-enrollment (Dual Enrollment) of individuals in multiple programs is allowable. Prior to program participation, an individual is required to meet Dislocated Worker eligibility criteria as well as the eligibility criteria established for the other program(s) the individual is also wanting to enroll in.

Co-enrollment will ensure a participating individual has access to a wide array of skills training or other services offered by Core and/or Required Partners that will help them achieve long-term success in the job market.

Participant orientation, eligibility determination and enrollment into appropriate programs is the responsibility of regional American Job Center Case Managers/Planners.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 50

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: In-School Youth Eligibility Criteria

According to youth eligibility criteria, an In-School Youth is considered “low income” if he/she receives or is eligible to receive a free or reduced priced lunch under the Richard B., Russell National School Lunch Act.

If this is the case, it will be necessary for Customer Career Planners/Data Control Coordinators to get hard copy backup documentation to support that the In-School Youth is in fact receiving or is eligible to receive a free or reduced price lunch. Backup documentation is to be maintained in the youth participant’s file.

Additionally, any In-School Youth who qualifies as “low income” because he/she is receiving or is eligible to receive a free or reduced priced lunch must also have a 2nd barrier to employment. Supporting backup documentation for the 2nd barrier to employment is to be maintained in the youth participant’s file.

In-School Youth who are “low income” because he/she receives or is eligible to receive a free or reduced priced lunch will be served on a “first come/first serve” basis.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 51

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Eighty percent (80%) Out-of-School Expenditure Rate

The NPWDB, Inc. requires that no less than eighty percent (80%) of the region's total youth award budget be spent on Out-of-School Youth.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 52

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Programs/Services to be provided at regional Comprehensive American Job Center(s)

Each regional comprehensive American Job Center must have at least one (1) Title I staff member physically present.

A comprehensive Job Center must provide the following:

- Career Services;
- Access to Training Services;
- Access to Employment and Training Activities;
- Access to Programs and Services carried out by required Partners, including Wagner-Peyser Employment Services; and,
- Workforce and Labor Market Information.

Job seeking and employer customers must have access to these Programs and Services during the regular business day.

Access to Programs and Services means having either Job Center staff physically present at the comprehensive Job Center; having Partner Program staff physically present at the comprehensive Job Center and appropriately trained to provide information to customers about offered Programs and Services; or providing direct linkage through technology to Job Center staff that can provide meaningful information or services.

“Direct linkage” means: providing direct connection at the comprehensive Job Center within a reasonable time period or through a real-time Web-based communication to Job Center staff who can provide program information or services to the customer. A direct linkage does not include providing a phone number or computer Web-site that can be used at an individual’s home; providing information, pamphlets or materials; or making arrangements for the customer to receive services at a later time or on a different date.

All comprehensive Job Centers must be physically and programmatically accessible to individuals with disabilities.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 53

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Affiliated American Job Center Site(s)

An affiliated American Job Center site is a site that makes available one (1) or more of the required Partners Programs and Services to job seeker and employer customers. An affiliated site(s) is considered “an access point” in addition to regional comprehensive American Job Center(s) in the region.

An affiliated site does not need to provide access to every required Partner Program and Service. The frequency of Job Center staff physical presence at affiliate site(s) in the region will be no less than five (5) days per week.

If Wagner-Peyser Employment Services are provided at an affiliated site in the region, there must be at least one (1) other required Partner at the affiliate site with staff physically present more than fifty percent (50%) of the time the affiliate site is open. Additionally, the other required Partner must not be the Partner administering local Veterans Employment Programs; Disabled Veterans Outreach Program; or Unemployment Compensation Programs. If Wagner-Peyser Employment Services and any of these three (3) other Programs are provided at an affiliated site, an additional Partner must have staff present at the affiliated site more than fifty percent (50%) of the time the affiliated site is open.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 54

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Business Services

Certain Career Services must be made available to area businesses, specifically Labor Exchange Activities and Labor Market Information.

Job Center Operator staff must establish and develop ongoing working relationships with large and small employers within the region. Job Center Operator Staff must also develop, convene or implement industry or sector partnerships on an ongoing and regular basis.

Customized Business Services may be provided to employers and employer associations in the region. These Services are to be tailored for specific employers and may include:

- Customized screening and referral of qualified participants in Training Service to employers;
- Customized services to employers and employer associations in the region on employment-related issues;
- Customized recruitment events for employers, including Job Fairs; and,
- Human Resource Consultation Services, including writing/reviewing job descriptions and employee handbooks, developing performance evaluations and personnel policies, creating orientation sessions for new workers, honing job interview techniques for efficiency and compliance, analyzing employee turnover or explaining labor laws to help employers comply with wage/hour and safety/health regulations and customized Labor Market Information for specific employers, sectors, industries or clusters.

Other Business Services may be provided through the use of economic development, philanthropic and other public and private resources in the region.

Other allowable Business Services consistent with each required Partner Programs and Services that may also be provided include:

- Developing and implementing industry sector strategies;
- Assistance or referral assistance in the development of a registered apprenticeship program;

- Developing and delivering workforce investment services and strategies for area employers, like career pathways, skills upgrading, skill development and certification for recognized post-secondary credentials or other employer use;
- Assistance to area employers managing reductions in force in coordination with Rapid Response activities and with strategies for the aversion of layoffs;
- Marketing Business Services to area employers, including small and mid-sized employers; and,
- Assisting area employers with accessing local, State and federal tax credits.

Business Services may be provided to area employers on a fee-for-service basis or through the leveraging of economic development, philanthropic or other public and private resources. Job Center Operator staff will be responsible for developing an appropriate cost structure for Business Services offered in the region. The cost structure developed for the delivery of Business Services must receive approval from the NPWDB, Inc. prior to implementation.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 55

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Registering Adults and Dislocated Workers as “Participants”

Information to support a determination of WIOA eligibility may include electronic data transfer, personal interviews or an individual’s application. Participation occurs after the registration process of collecting information to support an eligibility determination and begins when the individual receives a staff-assisted WIOA service, which does not include self-service or informational activities.

Adults and Dislocated Workers who receive services funded under Title I of the WIOA other than self-service or informational activities must be registered and must be a participant.

Employment opportunity data must be collected on every individual who is interested in being considered for WIOA Title I financially assisted aid, benefits, services or training by a recipient and who has signified that interest by submitting personal information in response to a request from the NPWDB, Inc.

To be eligible to receive Career Services as an Adult in the Adult and Dislocated Worker Program, an individual must be 18 years of age or older. To be eligible for a Dislocated Worker Program, an eligible Adult must meet the Dislocated Worker criteria outlined in the WIOA.

To be eligible to receive Career Services as a Dislocated Worker in the Adult and Dislocated Worker Program, an individual must meet the definition of a Dislocated Worker as outlined in the WIOA.

NPWDB, Inc. WIOA Title I funds for Adults and Dislocated Workers will be used to provide Career and Training Services at regional American Job Centers.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 56

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Internships or Work Experiences for Adults and Dislocated Workers

Internships or Work Experiences for Adults and Dislocated Workers are planned, structured learning experiences that take place in a workplace for a limited period of time.

Internships will be unpaid and will not exceed a maximum of six (6) weeks. An Adult or Dislocated Worker participating in the Internship Program will work no less than ten (10) hours per week.

An Internship may be arranged within the private-for-profit sector, the non-profit sector or the public sector.

Those Adults and Dislocated Workers who participate in Work Experiences will be paid at an hourly wage rate of no more than the current State of WV wage rate per hour for a period not to exceed six (6) weeks. Individuals participating in a Work Experience Program will work no less than twenty-five (25) hours per week.

A Work Experience may be arranged within the private-for-profit sector, the non-profit sector or the public sector.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 57

Date: September 16, 2015

Effective Date: September 16, 2015 Modified Date: January 23, 2017

Subject: Test of Adult Basic Education (TABE) and the Career Plan Development Manual

Effective January 23, 2017, the Self-Directed Search (SDS) will no longer be administered in the region.

The NPWDB, Inc. will use the Test of Adult Basic Education (TABE) and the Career Plan Development Manual for evaluating and assessing WIOA eligible Adults and Youth in the region.

The TABE Test will assess and evaluate the skills and knowledge of the WIOA participant. And, the Career Plan Development Manual will match a participant's skills and interest to specific job(s), career pathway(s), occupation(s), field(s) of study, etc.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 58

Date: September 16, 2015

Effective Date: September 16, 2015

Subject: Determination of Older Youth Participation in a Youth or Adult WIOA-funded Program

Job Center staff will be responsible for determining whether an Older Youth should be/will be referred to a WIOA-funded Youth Program or a WIOA-funded Adult Program based on the service needs of the Older Youth participant and if the Older Youth participant is “career-ready” based on an objective assessment of his/her occupational skills, prior work experience, employability and needs.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 59

Date: September 16, 2015

Effective Date: September 16, 2015

Modified Date: November 2, 2015, January 5, 2017

Subject: Definition of “Basic Skills Deficient”

“Basic skills deficient” is defined as an individual who is:

A youth, who has English reading, writing or computing skills at or below the 8th grade level on a general accepted standardized test;

Or,

A youth or adult who is unable to compute or solve problems, read, write or speak English at the level necessary to function on the job, in the individual’s family or in society.

Special care must be exercised to not discriminate on the basis of race, color, national origin, sex, age, disability, religion, political affiliation or belief, participant status and against certain noncitizens.

In assessing basic skills, Staff must use assessment instruments that are valid and appropriate for the targeted population and must provide reasonable accommodations in the assessment process, if necessary and needed (ie: Individuals with disabilities, etc.).

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 60

Date: November 24, 2015

Effective Date: November 24, 2015; Modified Date: March 7, 2017

Subject: Youth Work Experiences – Allowable Costs

At least twenty percent (20%) of youth funds will be spent on paid and unpaid work experiences that incorporate academic and occupational education for in-school and out-of-school youth.

Allowable Work Experience expenditures include the following:

- Staff time spent identifying and developing work experiences opportunities;
- Staff time working with employers to identify and develop the work experience;
- Staff time spent working with employers to ensure a successful work experience;
- Staff time managing the work experience;
- Staff time spend evaluating the work experience;
- Participant work experience orientation sessions;
- Employer work experience orientation sessions;
- Classroom training or the required academic education component directly related to the work experience;
- Wages/Stipends paid for participation in a work experience;
- Incentive payments directly tied to the completion of the work experience; and,
- Employability skills/job readiness training to prepare youth for the work experience.

Supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist the youth in participating in the work experience.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 61

Date: November 24, 2015

Effective Date: November 24, 2015

Subject: Definition of “School”

Definition of “School Dropout”

“School” is defined as both secondary and postsecondary school. Therefore, an individual attending either a secondary or postsecondary school is considered an “In-School” Youth.

“School Dropout” refers to an individual who has dropped out of high school and not completed their high school diploma or equivalent. The term “School Dropout” does not include an individual who has dropped out of postsecondary education.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 62

Date: November 24, 2015

Effective Date: November 24, 2015; Modified March 7, 2017

Subject: In-School & Out-of-School Youth Determination

Determination of whether a youth participant is an “In-School” or “Out-of-School” Youth is made at the time of program enrollment. Once the school status of a youth is determined, that school status remains the same through the youth’s participation in a WIOA funded youth program.

If a youth participant is enrolled in any credit-bearing post-secondary education classes, including credit-bearing community college classes and credit-bearing continuing education classes, then they are considered attending post-secondary education and are an in-school youth. If the youth is only enrolled in non-credit-bearing post-secondary classes, they would not be considered attending post-secondary school, and therefore, are out-of-school youth.

If a youth is enrolled in a WIOA youth program during the summer and is between schools years the youth is considered in-school youth if they are enrolled to continue school in the fall. If a youth is enrolled in the WIOA youth program between high school graduation and post-secondary education, the youth is considered in-school youth if they are registered for post-secondary education, even if they have not yet begun post-secondary classes at the time of WIOA youth program enrollment. However, if a youth graduates high school and registers for post-secondary education, but does not ultimately follow through with attending post-secondary education, then such youth would be considered out-of-school youth if the eligibility determination is made after the point that the youth decided not to attend post-secondary education.

Providers of adult education, YouthBuild, the Job Corps program, high school equivalency programs and dropout re-engagement programs are not considered to be “schools” for the purpose of determining school status. However, there is one (1) exception. Youth attending high school equivalency programs including those considered to be dropout re-engagement programs, funded by the public K-12 school system that are classified by the school system as still enrolled in school are considered in-school youth.

WIOA youth programs will classify homeschooled youth as in-school or out-of-school youth based on State Education Policy.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 63

Date: May 26, 2016

Effective Date: May 26, 2016

Subject: Career-Ready Skills Assessment Instrument(s) to Determine Pre and Post Career
Readiness Skills

The NPWDB, Inc. will use specific assessment tool(s) to determine if a participating youth has achieved a measureable increase/outcome or not. A Career-Ready Skills Assessment Pre/Post Test has been developed using criteria from a NPWDB, Inc. approved Career-Ready Skills Handbook. This Handbook will address career pathways services (ie: educational and career goals). The same Career-Ready Skills Assessment Test(s) will be used for both Pre and Post-tests.

The Pre and Post Test will consist of a set of True/False questions collected from information obtained in the NPWDB, Inc. approved Handbook. The Pre-Test will be given, and scored, by Youth Service System, Inc. (YSS) staff once a youth begins the Summer Youth Work Experience Program. Once scored, the Pre-Test will then be given to NPWDB, Inc. Program Staff to keep on file.

During the eight (8) week Summer Youth Work Experience Program, youth will be required to receive no less than twenty (20) hours of Career-Ready Skills training. YSS, Inc. staff and, when necessary, Site Supervisors, will be required to provide this training. A NPWDB, Inc. approved Summer Youth Work Experience Program Handbook will be provided to each participating youth.

Prior to the end of the first week (1st) of the Summer Youth Work Experience Program, YSS, Inc. staff, and when necessary, Site Supervisor(s) will be required to Post-Test each participating youth using the same test. YSS, Inc. Program Staff and when necessary, Site Supervisor(s) will then score the test and provide it to NPWDB, Inc. staff. Prior to the end of the second (2nd) work week, YSS, Inc. staff will review the test to determine if a measurable increase/outcome was achieved. If a measureable increase/outcome cannot be determined, then a second assessment tool, a Career-Ready Skills Checklist, will be reviewed to determine if there is a measureable increase/outcome in Career-Ready Skills that can be noted. (With regard to the second assessment test, a Career-Ready Skills Checklist, each Summer Youth Work Experience Program youth participant will be assessed for Career-Ready Skills beginning on their second week of employment. In order to assign a score using this assessment tool, NPWDB, Inc. paid Site Supervisor(s), or the Worksite Representative's Supervisor(s) will be required to closely monitor participating youths' work ethics and ability to perform assigned tasks prior to completing the Pre-Employment Score). The Pre-Employment Career-Ready Skills Checklist will be completed by NPWDB, Inc. paid Site Supervisor(s) or the Worksite Representative's Supervisor(s). NPWDB, Inc. paid Site Supervisor(s) or the worksite representative's Supervisor(s) will also be required to complete a Post-Employment Career-Ready Skills Checklist during the third (3rd) week of the program. Should participating youth terminate his/her employment prior to the third (3rd) work week, then NPWDB, Inc.

paid Site Supervisor(s) or Worksite Representative Supervisor(s) will not be required to ensure the completion of the Career-Ready Skills Checklist. Upon completion of the Post-Employment Career-Ready Skills Checklist, the original will then be given to NPWDB, Inc. staff and the copy is to be provided to participating youth so that he/she can include it in their Career Goals Portfolio, have it available to provide to future potential employers as reference to their skills and abilities, etc.

Only one (1) approved assessment tool will be required to prove that a measureable increase/outcome has occurred.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 64

Effective Date: May 26, 2016

Effective Date: May 26, 2016; July 1, 2022

Subject: Guidelines for Youth Work Experience Programs Funded with Workforce Innovation & Opportunity Act Funding.

Youth Services Systems, Inc. (YSS) will be responsible for administering and providing eligible area youth with a Summer Youth Work Experience Program during the summer of 2016 using Workforce Innovation & Opportunity Act (WIOA) funding. “Summer employment opportunities” are paid work experiences that have both an academic component and an occupation component.

The Summer Youth Work Experience Program will provide area youth, ages 14-24, with paid work experiences in “high demand” occupations as determined by current labor market data. The Summer Youth Work Experience Program will operate for an eight (8) week period during the summer months beginning no earlier/later than the 2nd week of June and terminating no earlier/later than the 1st week of August. Participating youth will earn \$9.25 per hour. If necessary/needed, YSS, Inc. may hire Site Supervisors to oversee youths’ day-to-day work activities. There will be one (1) Site Supervisor assigned to every five (5) participating youth. Site Supervisors will earn \$10.75 per hour. Participating youth and Site Supervisors will work no more than eight (8) hours per day for a maximum total number of thirty-two (32) hours per week. Weekly work schedule for participating youth and Site Supervisors will be Monday – Thursday. The NPWDB, Inc. and YSS, Inc. will comply with State and federal laws as they relate to the number of hours per week a “younger youth” can work/perform.

YSS, Inc. will give all participants a Handbook at the start of the Summer Youth Work Experience Program that will explain/describe rules, regulations, policies/procedures, duties/responsibilities, payroll schedule, etc. All participating youth, Site Supervisors and worksites will use all YSS, Inc. prepared Summer Youth Work Experience Program forms, handouts, etc.

YSS, Inc. will be responsible for requesting a Blanket Work Permit from the WV Department of Labor for 14 - 15 year old youth working on the Summer Youth Work Experience Program.

The Summer Youth Work Experience Program will be coordinated with local County Commission offices.

YSS, Inc. will identify participating worksite(s), public, private sector and non-profit, via a public solicitation process prior to the start of the Program. YSS, Inc. will be responsible for selecting participating worksites. YSS, Inc. will make every effort to match employment opportunities to participating youths’ interests, education level, career readiness and career goals. Additionally, work experiences are to be structured to impart measurable communications, decision-making, learning skills, etc. to youth.

Participating worksites will be required to provide youth with age-appropriate activities. Whenever possible, youth, ages 14 – 17, will work primarily at public and non-profit worksites. Youth, ages 18 - 24, may work at public, private sector or non-profit worksites.

Worksite selection criteria has been established in the region for for-profit companies as part of the Worksite Application Process to ensure summer employment is a viable work experience that will increase a youth's career readiness skills levels.

Once worksite selections are made, YSS, Inc. will maintain all worksite information, etc., along with number of youth(s) to be referred to worksite, etc. YSS, Inc. staff will be responsible for referring youth to their worksite location(s).

YSS, Inc. will comply with all Workplace Safety Guidelines as defined in TEGL 14-08. Participating worksites will also be required to adhere to federal, State and local safety guidelines and applicable federal and State Wage Laws.

The region's Priority of Services for youth must be adhered to for the operation of the Summer Work Experience Program.

Participating youth, once deemed WIOA eligible, are to be "TABE" tested. However, those youth who are currently enrolled in a WIOA activity and have been TABE tested within a one (1) year period do not have to be re-tested for the 2016 Summer Youth Work Experience Program.

During the eight (8) weeks of summer employment, participating youth will receive no less than twenty (20) hours of career-ready skills training while working at their worksites during the first two (2) weeks of the Program. This training will be provided by YSS, Inc. staff and/or, Site Supervisors.

For reporting purposes, YSS, Inc. will be required to track the number of participating youth enrolled in the Summer Work Experience Program and the completion rate.

Participating youth will be pre and post tested, using a NPWDB, Inc. approved assessment tool(s), to ensure measurable career-ready skill(s) have been achieved.

Youth enrolled in the Summer Work Experience Program are to be included within regular WIOA reporting methods (ie: MACC system, quarterly reporting, etc.) and be subject to the full set of WIOA Youth performance measures.

Participant youth who do not yet have a high school diploma must be referred to a TASC preparatory course in an effort to obtain a TASC.

Follow-up services must be delivered to participating youth. Regular follow-up services are to be completed for those youth who have ended their participation in the Summer Youth Work Experience Program and are referred to/carried into the year-long WIOA Youth or Adult Program or Service (ie: Twelve (12) month follow-up services must be provided to youth participating in the Year-Long Youth Program or Services and six (6) month follow-up services must be provided to youth participating in a Year-Long Adult Program or Service).

The region's Individual Service Strategy (ISS) Plan document is to be completed for youth newly enrolled in the Summer Youth Work Experience Program.

No less than eighty percent (80%) of participating youth must be out-of-school. Older and out-of-school youth will be encouraged to continue receiving appropriate/needed programs, services and activities beyond the summer months including but not limited to: occupational skills training, academic skills training, supportive services, etc.

Supportive services (ie: safety gear, etc.) may be provided to participating youth depending on need and necessity. Whether a participating youth is in need of these services will be determined on a case by case basis by YSS, Inc. staff. Any supportive services to be provided must have prior approval from the NPWDB, Inc.'s Assistant Director.

YSS, Inc. is encouraged to help recruit currently enrolled youth into the NPWDB, Inc.'s Summer Youth Work Experience Component. Year-long Youth Providers will also be encouraged to recruit youth who have not yet been enrolled in a YSS, Inc. sponsored youth program/activity into the YSS, Inc.'s Summer Youth Work Experience Program.

The NPWDB, Inc. and YSS, Inc. will adhere to federal and State guidelines, rules and regulations governing the

Summer Youth Work Experience Program; and, ADA guidelines. Discrimination and harassment of any kind will not be tolerated.

Up to five percent (5%) participating youth served in the region's youth programs may be youth who do not meet the income criterion for eligibility provided they have additional barriers to employment as identified in the WIOA and may be granted approval for program participation by the NPWDB, Inc.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 65

Date: May 25, 2016

Effective Date: July 1, 2016

Subject: Delivery of Career Pathway Services

NPWDB, Inc. Case Managers, Core Partners, Youth Service Provider(s) and other WIOA funded Service Provider(s) will assist WIOA Participants in developing a Career Pathways Plan in accordance with the WIOA definition of Career Pathways.

Career Pathways is defined as: “A combination of rigorous and high-quality education, training and other services that: (A) Aligns with the skill needs of industries in the economy of the State or regional economy involved; (B) Prepares an individual to be successful in any of a full range of secondary or post-secondary education options, including apprenticeships...; (C) Includes counseling to support an individual in achieving the individual's education and career goals; (D) Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster; (E) Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable; (F) Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one (1) recognized post-secondary credential; and (G) Helps an individual enter or advance within a specific occupation or occupational cluster.” [WIOA, Sec. 3(7)].

The ongoing development of a Career Pathways Plan must be documented in the WIOA Participant's Case Notes and in the Participant's Individual Employment Plan (IEP). Hard copy documentation related to the development of the Career Pathways Plan must also be kept in the WIOA Participant's file (along with all Case Notes, the IEP, etc.) that shows how staff assisted the WIOA Participant with helping him/her achieve Career Pathways goals.

NPWDB, Inc. Case Managers, Core Partners, Youth Service Providers and other WIOA funded Service Provider(s) will also provide Follow-Up Services to WIOA Participants on an ongoing and regular basis so documentation can be entered into the MACC system, showing progress and/or achievement of Career Pathways goals. Hard copy of all Follow-Up Services provided is to be placed in the WIOA Participant's file. (In the future, all relevant Career Pathways Services will need to be assigned to WIOA Participants in the MACC system once the State Workforce WV Office issues policy on this issue and modifies the MACC system to satisfy this requirement. The NPWDB, Inc. will notify you once these action are taken by the State Workforce WV Office).

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 66

Date: January 5, 2017

Effective Date: January 5, 2017

Subject: Definition of “Unlikely to Return to Previous Industry or Occupation”

“Unlikely to return to work” refers to an individual who has family or personal issues and a lack of necessary skills or difficult financial circumstance whereby it is affecting the individual’s likelihood to return to a previous industry or occupation. This individual is laid off without a recall date and the projected annual increase in employment growth according to labor market data is fewer than thirty (30) jobs in the previous occupation. Eligibility documentation criterion is: Letter stating that the layoff is permanent or a copy of the WARN Notice stating closure of business where individual was employed is permanent; Self-attestation statement from individual.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 67

Date: January 5, 2017

Effective Date: January 5, 2017

Subject: Description of Documentation required to Demonstrate “A Need for Training”

“A need for training” will be a collaborative decision made with input from the individual and his/her Customer Career Planner/Data Control Coordinator. Past activities, experience and education levels, job readiness level and the Individual Employment Plan (IEP) will determine the need for training. Eligibility documentation criterion is: Layoff Notice, if applicable; Proof of unemployment; Self-attestation statement; Proof of low income; Proof of public assistance; and, Justification statement.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 68

Date: January 5, 2017

Effective Date: January 5, 2017

Subject: Definition of “Self Sufficiency”

An individual is considered “self-sufficient” if he/she is considered to be non-reliance or is a member of a family that is no longer reliant on cash payment (TANF) or non-cash benefits (Food Stamps) under a Federal, State or local income based assistance program; and, He/she is employed with a fringe benefit package that includes medical; and, is employed with a family income annualized at being greater than 125% of the Lower Living Wage Standard Income Level according to the West Virginia Lower Living Standard Income Levels Guideline Chart.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 69

Date: January 5, 2017

Effective Date: January 5, 2017

Subject: Case Management & Follow-Up Services

One Stop Operator Staff will be required to develop an operations manual that outlines career planning best practices.

Career planning is a client-centered approach in the delivery of service design to prepare and coordinate comprehensive employment plans, such as service strategies for participants to ensure access to necessary workforce investment activities and supportive services using, where feasible, computer-based technologies and to provide job education and career counseling during program participation and after job placement.

Initial assessment provides preliminary information about the individual's skill levels including literacy, numeracy, English language proficiency, aptitudes, abilities including skills gaps and supportive service needs.

As a basis career service for adults and dislocated workers, the initial assessment is intended to be a brief, preliminary information gathering process that, among other things, provides sufficient information about an individual's basic literacy and occupational skill levels to enable the One Stop Operator Staff to make appropriate referrals to service available at American Job Centers and partner programs.

Each participant or applicant who meets the minimum income criteria for consideration as an eligible youth is to be provided: Information on the full array of applicable or appropriate services that are available at American Job Centers or through eligible training providers or partners; and; Referral to appropriate training and education programs that have the capacity to serve the participant or applicant either on a sequential or concurrent basis. To meet the basic skills and training needs of a youth applicant, each eligible training provider of a program of youth activities shall ensure that an eligible applicant who does not meet the enrollment requirements of the particular program or who cannot be served shall be referred for further assessment, as necessary, and referred to appropriate programs to meet the basic skills and training needs of the applicant.

Registration is the process of collecting information to support a determination of eligible. This information may be collected through methods that include electronic data transfer, personal interviews or an individual's application. Participation occurs after the registration process of collecting information to support an eligibility determination and begins when the individual receives a staff-assisted WIOA service,

which does not include self-service or informational activities.

Adults and dislocated workers who receive services funded under Title I of the WIOA other than self-service or informational activities must be registered and must be a participant.

Enrollment in the WIOA youth program requires the collecting of information to support an eligibility determination and participate in any of the fourteen WIOA youth program elements. All youth who participate in the youth program must be enrolled in the WIOA program in order to receive any youth services. A youth dropout status is determined at the time of WIOA youth program enrollment. An individual who is out-of-school at the time of registration and subsequently placed in an alternative school may be considered an out-of-school youth for the purposes of the 80% expenditure requirement for out-of-school youth.

Employment opportunity data must be collected on every individual who is interested in being considered for WIOA Title I financially-assisted aid, benefits, services or training by a recipient, and who has significant that interest by submitting personal information in response to a request from a grant recipient or designated service provider.

Eligibility for WIOA training services may be made available to employed and unemployed adults and dislocated workers who:

1. The One Stop Operator staff or partner staff determines, after an interview, evaluation, assessment and career planning are:
 - Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services;
 - In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages for previous employment;
 - Have the skills and qualifications to participate successfully in training services.
2. Have selected a provider of training services that is directly linked to the “high demand” employment opportunities in the local area or the planning region or in another area to which the individual is willing to commute or relocate.
3. Are unable to obtain grant assistance from other sources to pay costs of such training, including such services as State funded training funds, TAA and Pell grants or require WIOA assistance in addition to their sources of grant assistance.
4. If training services are provided through the adult funding stream, are determined eligible in accordance with the State and local priority system.

Local youth programs must provide an objective assessment of the academic skill levels, and service needs of each participant. The assessment shall include a review of basic skills, occupational skills, prior work experiences, employability interests, aptitudes, including interest and aptitudes for non-traditional jobs, supportive service needs and developmental needs of such participant for the purpose of identifying

appropriate services and career pathways for participants.

A new assessment of a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent assessment of the participant conducted pursuant to another education or training program.

The Individual Employment Plan is an individual career service that is jointly developed by the participant and the Customer Career Planner/Data Control Coordinator, when determined appropriate by One Stop Operator staff or partner staff. The IEP is an ongoing strategy to identify employment goals, achievement objectives and the appropriate combination of services for the participant to achieve employment goals.

- If determined appropriate based on the need of the individual participant, the combination of services includes supportive services.
- The development of an IEP is only one of the career services that may be provided to adults an dislocated workers determined to be in need of such services, it is not a condition to receive that service
- Local youth programs must develop Individual Service Strategies (ISS) for each participant that are directly linked to one or more indicators of performance and that shall identify career pathways that include education an employment goals, appropriate achievement objectives and appropriate services for the participant that take into account the objective assessment.
- A new service strategy for a youth participant is not required if the provider carrying out such a program determines it is appropriate to use a recent service strategy developed for the participant.

Supportive services means services such as: transportation, child care dependent care, housing and needs-related payments that are necessary to enable an individual to participate in activities authorized under WIOA Title I.

After an interview, evaluation or assessment and career planning before deciding on training, the Customer Career Planner/Data Control Coordinator must ask these questions:

1. Has the participant met the qualifications to be eligible for training services?
2. Does the participant have the skills and qualifications to successfully complete the selected training programs?
3. Is the provider of training services directly linked to “high demand” employment either in the local area or in another area to which the participant is willing to relocate?
4. Is there another funding source willing to pay the costs of the training, including such sources as State-funded training funds TAA and Pell Grants?
5. If funding is limited in the local area, does the adult participant meet the priority requirements given to recipients of public assistance and other low-income individuals?

For purposes of performance calculations, exit is the last date of services after which an individual received services through the adult, dislocated worker or youth program under WIOA Title I. The Adult Education and Literacy Program under WIOA Title II or the employment services authorized by Wager-Peyser as amended by WIOA Title II and no further services other than follow-up services are planned. Ninety days of no services does not include self- services, information-only activities or follow-up services.

Adult and dislocated workers follow-up services must be made available as appropriate for a minimum of 12 months following the first date of employment to registered participants who are placed in unsubsidized employment. Follow-up service must be provided, as appropriate, including: counseling regarding the workplace, for participants in adult or dislocated worker activities who are placed in unsubsidized employment, for up to 12 months after the first date of employment.

Follow-up services must be made available to all youth participants for not less than 12 months after the completion of participation. Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training. Follow-up services must include more than only a contact attempt or made for securing documentation in order to report a performance outcome.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 70

Date: January 30, 2017

Effective Date: January 30, 2017

Subject: WIOA Grievance Procedures - New

Workforce Innovation & Opportunity Act Local Level Grievance Procedure

Any WIOA Title I program participant or other interested party adversely affected by a decision or action by the local workforce development system, including decisions by One-Stop partners and services providers, has the right to file a grievance or complaint with the LWDB (Title 20 CFR Sections 683.600-683.610). It must be filed within thirty (30) days of the date the incident occurred.

Grievance: A written expression by a party alleging a violation of WIOA, regulations promulgated under WIOA, recipient grants, sub-agreements, or other specific agreements under WIOA. All complaints, amendments, and withdrawals shall be in writing. This policy is intended to resolve matters which concern actions arising in connection with the WIOA Title I grant program.

Grievance Procedure

A. Form and Filing of Grievance or Complaint

The official filing date of the grievance or complaint is the date the written grievance or complaint is received by the LWDB, its service providers, One-Stop partners, or sub-recipients. The filing of the grievance or complaint will be considered a request for a hearing, and the LWDB shall issue a written decision within 60 days for the filing of the grievance or complaint.

The grievance or complaint must be writing, signed, and dated. For resolution purposes, the SWDB requires that the following information be obtained or provided for all complaints:

- Full name, telephone number, and mailing address of the complainant;
- Full name, telephone number, and mailing address of the respondent;
- A clear and concise statement of the facts and dates describing the alleged violation;
- The provisions of the WIOA, the WIOA regulations, grant, or other agreements under the WIOA, believed to have been violated;

- Grievances or complaints against individuals, including staff or participants, shall indicate how those individuals did not comply with the law, regulations, or contract; and
- The remedy sought by the complainant.

The absence of any of the requested information shall not be a basis for dismissing the grievance or complaint.

A grievance or complaint may be amended to correct technical deficiencies at any time up to the time of the hearing. The 30 day time period in which a grievance or complaint may be filed is not extended for grievances or complaints that are refiled with amendments. Grievances or complaints may be withdrawn at any time prior to the issuance of the hearing officer's decision. The LWDB shall send a copy of the grievance or complaint to the respondent.

B. Informal Resolution

The LWDB shall notify the complainant and the respondent of the opportunity for an informal resolution. Respondents must make good faith efforts to resolve all grievances or complaints prior to the scheduled hearing. Failure on the part of either party in the grievance or complaint to exert good faith efforts shall not constitute a basis for dismissing the grievance or complaint, nor shall this be considered to be a part of the facts to be judged in the resolution process. Where a complaint alleges a violation of WIOA Title I, grant or any agreements under WIOA, the LWDB must assure that every grievance or complaint not resolved informally or not withdrawn is given a hearing, regardless of the grievance or complaint's apparent merit or lack of merit.

When the complaint has been resolved through the informal resolution process, the LWDB shall attempt to contact the complainant and have him or her provide a written withdrawal of the complaint within 10 days of the receipt of the notice of resolution or impasse where a complainant decides not to proceed to an administrative hearing. The LWDB shall maintain copies of correspondence in the local office complaint file.

C. Notice of Hearing

Hearings on any grievance or complaint shall be conducted within 30 days of filing of a grievance or complaint. The complainant and the respondent must be notified in writing of the hearing 10 days prior to the date of the hearing. The 10-day notice may be shortened with the written consent of both parties. The hearing notice shall be in writing and contain the following information:

- The date of the notice, name of the complainant, and the name of the party against whom the grievance or complaint is filed.
- The date, time, and place of the hearing before an impartial hearing officer.
- A statement of the alleged violations. These statements must accurately reflect the content of the grievance or complaint as submitted by the complainant. However, clarifying notes may be added to assure that the grievance or complaint is addressed accurately.
- The name, address, and telephone number of the contact person issuing the notice.

D. Conduct of Hearings

An impartial hearing officer shall conduct the hearing. The LWDB will seek impartial hearing officers from among the staff of legal offices or personnel departments of municipalities or counties that will not be directly affected by, or will not implement the final resolution of, a specific grievance or complaint.

The hearing will be conducted in an informal manner with strict rules of evidence not being applicable and according to the procedures established by the LWDB. Both parties will have the right to present written and/or oral testimony and arguments; the right to call and question witnesses in support of their position; the right to examine records and documents relevant to the issues; and the right to be represented. The hearing will be recorded electronically or by a court reporter.

E. Decision

Not later than 60 days after the filing of the grievance or complaint, the hearing officer shall mail a written decision to both parties by first class mail. The hearing officer's decision shall contain the following information:

- The names of the parties involved;
- A statement of the alleged violation(s) and issues related to the alleged violation;
- A statement of the facts;
- The hearing officer's decision and the reasons for the decision;
- A statement of corrective action or remedies for violations, if any, to be taken; and
- Notice of the right of either party to request a review of the decision by the State Review Panel within 10 days of the receipt of the decision.

F. Appeal

If a complainant does not receive a decision at the LWDB level within 60 days of the filing of the grievance or complaint, or receives an adverse decision, the complainant then has the right to file an appeal with the State.

The complainant may request a State hearing by submitting a written notice of appeal to:

WorkForce West Virginia
Deputy Executive Director, Federal Programs
112 California Avenue, Room 613
Charleston, WV 25305

NPWDB, Inc. GRIEVANCE FORM

Filing Date: _____

Name of Complainant: _____

Address: _____

City: _____ State: _____ Zip Code: _____ Phone #: _____

Name of Respondent: _____

Address: _____

City: _____ State: _____ Zip Code: _____ Phone #: _____

Statement of Facts/Complaint (including dates of alleged violation and how the law/regulations/contract was not complied with):

WIOA Regulation(s)/Agreement(s) believed to be violated:

Remedy Sought by Complainant:

Complainant's Signature: _____ Date: _____

Informal Resolution Sought: _____

_____ I am satisfied with the Informal Resolution

_____ I am NOT satisfied with the Informal Resolution and wish to proceed with a Hearing

Complainant's Signature: _____ Date: _____

NPWDB, Inc. GRIEVANCE HEARING FORM

Hearing Notice Date: _____

Name of Complainant: _____

Party whom the Grievance is filed against: _____

Date/Time/Location of Hearing:

Statement of Alleged Violation(s): _____

Name/Address/Phone # of Person issuing the Notice: _____

Complainants' Signature: _____ Date: _____

Hearing Officer's Signature: _____ Date: _____

NPWDB, Inc. GRIEVANCE HEARING DECISION FORM

Date: _____

Name of Complainant: _____

Party whom the Grievance is filed against: _____

Statement of Alleged Violation(s): _____

Statement of Facts:

Hearing Officer Decision and Reason for Decision: _____

Corrective Action Plan/Remedy for Violation(s) (if any): _____

_____ I am satisfied with the Corrective Action Plan/Remedy

_____ I am NOT satisfied with the Corrective Action Plan/Remedy and a review of the decision by a

State Review Panel

Complainants' Signature: _____ Date: _____

Hearing Officer's Signature: _____ Date: _____

If a complainant does not receive a decision at the LWDB level within 60 days of the filing of the grievance or complaint, or receives an adverse decision, the complainant then has the right to file an appeal with the State.

The complainant may request a State hearing by submitting a written notice of appeal to:

WorkForce West Virginia
Deputy Executive Director, Federal Programs
112 California Avenue, Room 613
Charleston, WV 25305

Title 20 CFR Section 683.600(d) requires the State to provide a process for dealing with grievances and complaints from participants or interested parties affected by the statewide workforce development programs, resolving appeals of decisions issued at the LWDB level, remanding grievances and complaints related to the local WIOA Title I programs to the LWDB grievance process, and affording an opportunity for an informal resolution and a hearing to be completed within 60 days of the filing of the grievance or complaint.

In cases where the State has imposed either administrative or financial/monetary sanction(s) resulting from monitoring, investigations, or audits, the complainant may file an appeal with the State through the procedures established in their Audit Resolution guidance.

A. State-Level Informal Resolution and Hearing Procedures

All complaints of noncriminal violations of the requirements of WIOA by the State, or complaints by individuals or interested parties affected by the statewide workforce development program shall be filed in writing with the Deputy Executive Director of Federal Programs, WorkForce West Virginia. All requests for State hearings shall include the same basic elements necessary for local level hearings. These are:

- Full name, telephone number, and mailing address of the complainant;
- Full name, telephone number, and mailing address of the respondent;
- A clear and concise statement of the facts and dates describing the alleged violation;
- The provisions of the WIOA, the WIOA regulations, grant, or other agreements under the WIOA, believed to have been violated;
- Grievances or complaints against individuals, including staff or participants, shall indicate how those individuals did not comply with the WIOA law, regulation, or contract; and
- The remedy sought by the complainant.

Upon receipt of the request for a State hearing, the Deputy Executive Director of Federal Programs or his/her designee shall review the grievance or complaint and shall provide an opportunity for an informal resolution. The Deputy Executive Director of Federal Programs shall notify the complainant and the respondent within 10 days of receipt of the grievance or complaint and proceed with the informal resolution process. If the State cannot resolve the grievance or complaint informally, then a hearing will be held.

Hearings on any grievance or complaint shall be conducted within 30 days of the filing of a grievance or complaint. The complainant and the respondent shall be notified in writing of the hearing 10 days prior to the date of hearing. The hearing notice shall advise the following:

- The date, time, and place of the hearing before an impartial hearing officer.
- The pertinent sections of the WIOA or any other federal regulations involved.

- A statement of the alleged violations. These statements must accurately reflect the content of the grievance or complaint as submitted by the complainant. However, clarifying notes may be added to assure that the grievance or complaint is addressed accurately.
- The name, address, and telephone number of the contact person issuing the notice.

B. Appeals of LWDB Decisions or Requests for WFWV Review

1. A complainant may file a request for review with WFWV if no decision has been issued at the LWDB level within the 60-day time limit. A complainant may file an appeal if the LWDB has issued an adverse decision. The request for a WFWV review or appeal shall be filed or postmarked (if mailed) within 10 days from the date on which the complainant received an adverse decision from LWDB or 15 days from:
 - The date on which a complainant should have received a decision regarding a locally filed complaint, which is defined as five days from the date the decision was due, or
2. All requests for review or appeals shall include the following:
 - The full name, telephone number, and mailing address of the complainant;
 - The full name, telephone number, and mailing address of the LWDB;
 - A statement of the basis of the request or appeal; and
 - Copies of relevant documents, such as the complaint filed at the LWDB and the local decision, if any.
3. WFWV shall request the record of the hearing from the LWDB and shall review the record. WFWV shall notify the concerned parties and the LWDB by first class mail, certified with a return receipt, of the following information at least 10 days before a scheduled hearing:
 - The date of the notice, name of the complainant, and the name of the party against whom the complaint is filed.
 - The date, time, and place of the hearing before a hearing officer.
 - A statement of the alleged violations. This statement shall accurately reflect the content of the complaint as submitted by the complainant.
 - The name, address, and telephone number of the contact person issuing the notice.

C. Hearing

1. The WFWV hearing shall be conducted in an informal manner with strict rules of evidence not being applicable. Both parties shall have the right to present written and/or oral testimony under oath and arguments; the right to call and question witnesses; the right to request and examine records and documents relevant to the issues, and the right to be represented. The hearing shall be recorded.
2. The WFWV hearing officer shall be an Administrative Law Judge (ALJ).

D. Referral of Local Grievances or Complaints

Grievances or complaints filed directly with the State related to the local WIOA programs will be remanded to the LWDB grievance process in accordance with LWDB Grievance and Complaint Procedures.

E. Remedies

1. Remedies that may be imposed for a violation of any requirement under WIOA Title I shall be limited to:
 - Suspension or termination of payments under WIOA Title I;
 - Prohibition of placement of a participant with an employer that has violated any requirement under WIOA Title I;
 - Reinstatement, where applicable, of an employee, payment of lost wages and benefits, and reestablishment of other relevant terms, conditions, and privileges of employment; and
 - Where appropriate, to other equitable relief.
2. Nothing in paragraph 1 shall be construed to prohibit a complainant from pursuing a remedy authorized under another federal, State, or local law for a violation of WIOA Title I.

F. Federal-Level Appeal Process

Under Title 20 CFR Section 683.610(a)(1), if the State or Local Workforce Development Board has not issued a decision within the required 60-day time limit, the complainant can file an appeal to the Secretary of Labor. The appeal must be filed with the Secretary of Labor no later than 120 days of the filing of the grievance or complaint with the State, or the filing of the appeal of a local grievance or complaint with the State.

In cases where a decision has been reached and the State issued an adverse decision, the complainant can file an appeal to the Secretary of Labor within 60 days of the receipt of the decision being appealed.

The request for appeal must be submitted by certified mail, return receipt to:

Secretary
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210
Attention: ASET

A copy of the appeal must be simultaneously provided to the Region 2 ETA Regional Administrator, U.S. Department of Labor—Employment and Training Administration, Suite 825 East, The Curtis Center, 170 South Independence Mall West, Philadelphia, PA 19106 and the opposing party.

ACTION:

All recipients and sub-recipients of WIOA Title I funding through the Workforce Development Board of West Virginia shall utilize the grievance and complaint procedures specified in this policy or ensure that any policies or procedures established by the recipient or sub-recipient are in accordance with these requirements.

INQUIRIES:

Please direct inquiries about this directive to WorkForce West Virginia at (304) 558 - 6788.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 71

Date: February 15, 2017

Effective Date: February 15, 2017

Subject: Procurement Process for Selection of Regional One Stop Operator(s)

The NPWDB, Inc. will conduct an open and competitive procurement process (Request for Proposal (RFP) Process) to identify a One Stop Operator(s). The NPWDB, Inc. will determine whether the amount and quality of providers is sufficient to meet the needs of the community and to work with the Governor and others to increase the availability of service providers as part of the planning process. The NPWDB, Inc. will provide sufficient public notice of the intent to procure services to board members and the community. Public notice will be provided for at least thirty (30) days in the media where prospective local, State and national bidders typically identify such opportunities (ie., local print newspapers, on-line newspapers, the NPWDB, Inc.'s website, other community web sites, etc.).

The One Stop Operator(s) will be responsible for coordinating the service delivery of Core and Required Partners and Service Providers.

The One Stop Operator(s) role shall not include:

- Convening stakeholders to assist in the development of the local plan of service;
- Preparing and submitting local plans (as required of the Local Board under sec. 107 of WIOA);
- Being responsible for oversight of itself;
- Managing or significantly participating in the competitive selection process for a One Stop Operator(s);
- Selecting or terminating One Stop Operators;
- Negotiating local performance accountability measures; and,
- Developing or submitting budget for activities of the NPWDB, Inc.

The One Stop Operator(s) will be selected following the principles of competitive procurement in the Uniform Administrative Guidance at Chapter II of 2 CFR (in particular 2 CFR 200.318 through 200.326). The NPWDB, Inc. will adhere to applicable sections of the law and regulations and State policy in selecting a One Stop Operator(s) and awarding contracts under WIOA.

To allow the NPWDB, Inc. sufficient time to prepare a competitive procurement, including conducting market research, Request for Information (RFI), cost and price analysis, and conduct competitions, the initial selection of a One Stop Operator(s) will be concluded, with the Operator selected, in place and operating no later than June 30, 2017. Afterwards, the

competitive process used by the NPWDB, Inc. to procure a One Stop Operator(s) will be conducted at least once every four (4) years.

The NPWDB, Inc. will inventory the identification, availability and quality of potential providers and the allowable procurement process and how it was followed, including the selection criteria by which bids were scored to award a contract in writing. This documentation will be maintained by the NPWDB, Inc. The Governor must approve a waiver for a Local Workforce Development Board to provide One Stop Operator(s) and/or other services. The NPWDB, Inc. may choose a number of different approaches to determine if there are insufficient providers, including, but not limited to, conducting a Request for Information or asset mapping with stakeholders and community partners.

A One Stop Operator(s) may be a single entity or a consortium of entities. Types of entities that may be a One Stop Operator(s) include:

- An institution of higher education;
- A State Employment Service agency established under the Wagner-Peyser Act;
- A community based organization, nonprofit organization, or workforce intermediary;
- A private for-profit entity;
- A government agency;
- A Local Board, with the approval of the chief elected official and the Governor;
- Another interested organization or entity capable of carrying out the duties of a One Stop Operator(s);
- Local chamber of commerce;
- Business organization; or,
- Labor organization.

If the consortium of entities is a consortium of One Stop Partners, it must include three (3) of the One Stop Partners. A consortium of One Stop Partners is a minimum of three (3) separate entities, each responsible for at least one (1) of the following programs and activities in the local area:

- Programs authorized under Title I of WIOA;
 - Adults.
 - Youth.
 - Dislocated Workers (DW).
 - Job Corps.
 - Youth Build.
 - Native American Programs.
 - Migrant and seasonal farmworker programs (MSFW).
- Employment services authorized under the Wagner-Peyser Act (WP);
- Adult education and literacy authorized under title II of WIOA (AEL);
- Vocational Rehabilitation program authorized under title I of the Rehabilitation Act of 1973 (VR);
- Senior Community Service Employment Program authorized under title V of the Older Americans Act;
- Career and technical education programs at the post-secondary level authorized under the Carl D. Perkins Career and Technical Education Act of 2006;
- Trade Adjustment Assistance activities authorized under chapter 2 of title II of the Trade Act of 1974 (TAA);
- Jobs for Veterans State Grants programs authorized under chapter 41 of Title 38, U.S.C.;
- Employment and training activities carried out under the Community Services Block Grant (CSBG);

- Employment and training programs carried out by the U.S. Department of Housing and Urban Development (HUD);
- Programs authorized under State Unemployment Compensation Laws (UI);
- Programs authorized under the Second Chance Act of 2007; and,
- Unless specifically exempted by the Governor, Temporary Assistance for Needy Families (TANF) authorized under Part A title IV of the Social Security Act.

Any entity, including a current One Stop Operator(s) or a Local Workforce Development Board, competing to become the One Stop Operator must have adequate firewalls and conflict of interest policies and procedures in place to prevent them from being involved in the planning or execution of the competitive process because such involvement would be an inherent conflict of interest.

Local Workforce Development Boards may serve as the One Stop Operator in the region for which they are designated if they are determined to be the successful bidder in a solicitation that conforms to the principles of competitive procurement set forth in Uniform Administrative Guidance at 2 CFR 200.318-326, and only if approved internal control and conflict of interest policies are followed. Internal controls include the requirement that the solicitation and scoring process be managed by an impartial third (3rd) party free of conflicts of interest and that Local Workforce Development Board Staff and the organization that employs said staff cannot develop the solicitation for RFPs, facilitate the scoring process or score RFPs.

Maintenance of records will be kept by the NPWDB, Inc. regarding the One Stop Operator(s) procurement process including, but not limited to, documentation of the determination of the competitive procurement process followed as well as the specific details of that process and its results.

Acceptable processes include:

- Procurement by sealed bid;
- Procurement by competitive proposal (RFP Process); or,
- Under limited conditions, procurement by sole-source, only with the approval of the CEO and Governor after rigorous analysis of market conditions and other factors lead to a determination sole source procurement is necessary due to:
 - There is only one entity that could serve as the one-stop operator, or
 - An unusual and compelling urgency exists that will not permit a delay resulting from a competitive solicitation, or
 - The results of the competitive procurement were determined to be inadequate.

Sole Source can be claimed only if documented factors, including published notice(s) of intent made available to the public for at least thirty (30) days lead to a determination that only one (1) entity could serve as a One Stop Operator(s), compelling circumstances outweigh the delay that would result from a competitive solicitation, or results of the competition conducted are determined inadequate, and only with the agreement of the local Chief Elected Official and Governor. Local Workforce Development Boards may serve as a One Stop Operator under a sole source agreement for no more than the completion of the contract period or the completion of the program year, whichever comes first. Examples of compelling circumstances that outweigh delays that would result from competitive solicitations include the need to avoid a break in services if a One Stop Operator(s) is terminated for cause or is unable to continue providing services through the end of the contract period.

Local Workforce Development Boards must have in place and demonstrate adherence to appropriate internal controls and conflict of interest policies and procedures that are approved by the Governor.

Such policies must identify the appropriate internal controls. Inadequate responses are those judged by a panel of impartial reviewers to score below a pre-determined minimum level on the scoring criteria published as part of the solicitation. A Local Workforce Development Board must complete a “Request for Waiver to Serve as a One Stop Operator” and submit it to the State Workforce Development Board in accordance with WORKFORCE WV policy.

One Stop Operator agreements will be reviewed and updated no less than once every three (3) program years.

Procurement standards must ensure fiscal accountability and prevent waste, fraud, and abuse in WIOA programs. Where applicable, standards must support fair and competitive procurement of goods and services. Wherever possible and where required, agreements will be performance-based, as defined in Federal Acquisition Regulations (FAR) 37.6, and include the following minimum requirements:

- (1) Performance requirements defined in measurable, program-related terms;
- (2) Performance standards are tied to performance requirements; and,
- (3) Quality assurance plan describing how the Operator’s performance will be measured against performance standards.

All other non-federal entities, including Local Workforce Development Boards, must:

- (1) Follow general procurement standards established through State law, rule and policy, as well as through 2 CFR 200.318-326;
- (2) Develop and document local procurement policies, procedures and standards that reflect applicable State law, rule and policy and conform to federal law and standards of OMB Uniform Guidance;
- (3) Ensure full and open competition, where necessary;
- (4) Use the most economical approach to the procurement of goods and services;
- (5) Award only to a responsible One Stop Operator(s);
- (6) Maintain oversight in order to monitor contractor performance regarding contract terms, conditions and specifications; and,
- (7) Maintain records detailing the history of the procurement, including the rationale for the selected method of procurement, selection of contract type, basis for One Stop Operator(s) selection or rejection, and basis for contract price.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 72

Date: February 15, 2017

Effective Date: February 15, 2017

Subject: Procurement Process for Selection of Youth Service Providers and Providers of
Adult and Dislocated Worker Services

The NPWDB, Inc. will conduct open and competitive procurement processes (Request for Proposal (RFP) Process) to identify appropriate Youth Service Providers and Providers of Adult and Dislocated Worker Services. The NPWDB, Inc. will determine whether the amount and quality of providers is sufficient to meet the needs of the community and to work with the Governor and others to increase the availability of service providers as part of the planning process. The NPWDB, Inc. will provide sufficient public notice of the intent to procure services to board members and the community. Public notice will be provided for at least thirty (30) days in the media where prospective local, State and national bidders typically identify such opportunities (ie: local print newspapers, on-line newspapers, the NPWDB, Inc.'s website, other community web sites, etc.).

SELECTION OF YOUTH SERVICE PROVIDERS

If there is satisfactory and demonstrable evidence that there are an insufficient number of providers of Youth Services with the expertise required for serving in-school or out of school youth, sole source awards/contracts may be approved in lieu of a initiating a competitive procurement process.

The NPWDB, Inc. will document, in writing, that board members and the public were made aware of the competitive process used to identify Youth Service providers.

The NPWDB, Inc. will establish and use criteria, including the ability of service providers to meet performance accountability measures based on common measures, as well as initiate full and open competition consistent with 2 CFR parts 200 and 2900 in addition to applicable state and local procurement laws to procure eligible providers of Youth Workforce Investment Activities. The NPWDB, Inc. will assess the ability of Youth Program providers to meet performance accountability measures based on the primary federal indicators of performance for Youth Program.

The NPWDB, Inc. will design framework services, like: intake, objective assessment, development of individual service strategies, case management, and follow-up services that may be exempted from a competitive process if the NPWDB, Inc. determines that it can more appropriately provide these activities.

The NPWDB, Inc. will document, in writing, efforts to identify the availability of providers and the allowable procurement process used and how it was followed, including the selection criteria by which bids were scored to award a contract. All of this documentation will be maintained by the NPWDB, Inc.

SELECTION OF PROVIDERS OF ADULT AND DISLOCATED WORKER SERVICES

The NPWDB, Inc. cannot provide Adult or Dislocated Worker training services unless it is granted a written waiver by the Governor based on satisfactory and demonstrable evidence that:

- The NPWDB, Inc. determined that there were an insufficient number of eligible providers with expertise in serving Adults or Dislocated job seekers to meet local demand (Note: Local Workforce Development Boards must have come to this determination after having conducted competitive procurement described in Section 3(g)(i)(C) of the WIOA);
- The LWDB meets the requirements of an eligible training provider under Section 122 of the WIOA;
- The LWDB's proposed training services prepare participants for high demand industry sectors or occupations in the local area; and,
- The LWDB subjected its waiver determination and request to a minimum thirty (30) day public comment period and included all comments received in the final waiver request.

If this is the case, the NPWDB, Inc. will complete a Request for Waiver to Provide WIOA Adult and/or Dislocated Worker Training Services and submit it to the State Workforce Development Board should it decide to provide Adult or Dislocated Worker training services.

Sub awards are not procurement actions governed by this policy or other procurement laws, rules or policies unless:

- (1) Required by statute;
- (2) Required by own policies and procedures; or
- (3) Awarded on a competitive basis, in which instance the sub award will be governed by procurement rules detailed in 2 CFR 200.318-326

When a competitive procurement process is not used in the selection of a sub-recipient for a sub award, it must be guided by:

- (1) Documented internal controls, including written procedures for employee conduct and conflict of interest provisions;
- (2) The service provider's track record, considering past record of performance, cost principles, record of compliance and audit and monitoring results.

Procurement standards must ensure fiscal accountability and prevent waste, fraud, and abuse in WIOA programs. Where applicable, standards must support fair and competitive procurement of goods and services.

Wherever possible and where required, all agreements must be performance-based, as defined in Federal Acquisition Regulations (FAR) 37.6, and include the following minimum requirements:

- (1) Performance requirements defined in measurable, mission-related terms;
- (2) Performance standards are tied to performance requirements; and,
- (3) Quality assurance plan describing how the contractor's performance will be measured against performance standards.

All other non-federal entities, including Local Workforce Development Boards, must:

- (1) Follow general procurement standards established through State law, rule and policy, as well as through 2 CFR 200.318-326;
- (2) Develop and document local procurement policies, procedures and standards that reflect applicable State law, rule and policy and conform to federal law and standards of OMB Uniform Guidance;
- (3) Ensure full and open competition, where necessary;
- (4) Use the most economical approach to the procurement of goods and services
- (5) Award only to responsible contractors;
- (6) Maintain oversight in order to monitor contractor performance regarding contract terms, conditions and specifications; and,
- (7) Maintain records detailing the history of the procurement, including the rationale for the selected method of procurement, selection of contract type, basis for contractor selection or rejection, and basis for contract price.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 73

Date: February 15, 2017

Effective Date: February 15, 2017

Subject: Board of Director Assurances under the WIOA

According to WIOA Section 181(b) (7); 20 CFR 680.850, the NPWDB, Inc. will not use funds received under WIOA to assist, promote or deter union organizing.

The NPWDB, Inc. assures there will be no organizational or personal conflict of interest, political activity, lobbying activity, legislative activity or nepotism.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 74

Date: March 7, 2017

Effective Date: March 7, 2017

Subject: Youth Program Expenditures prior to Participation

Youth funds can be expended on outreach and recruitment or assessment for eligibility determination, such as assessing basic skills level, prior to eligibility determination, but they cannot be spent on youth program services, such as the fourteen (14) program elements, prior to eligibility determination.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 75

Date: March 7, 2017

Effective Date: March 7, 2017

Subject: Assessment Requirements for Youth

The WIOA youth program design requires an objective assessment of academic levels, skill levels and service needs of each youth participant, which includes a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs and developmental needs. Assessments must also consider a youth's strengths, rather than just focusing on areas that need improvement.

All youth, including youth with disabilities, can benefit from participation in career assessment activities, including but not limited to assessment of prior work experiences, employability, interests and aptitudes. Career assessment helps youth, including those with disabilities, understand how a variety of their personal attributes affect their potential success and satisfaction with different career options and work environments. Youth also need access to reliable information about career opportunities based on labor market information that provides a living wage, including information about education, entry requirements and income potential. Youth with disabilities also may need information on benefits planning, workplace supports and accommodations and also may benefit from less formalized career-related assessment such as discovery techniques. These assessments may be provided directly through WIOA youth program staff and/or through referrals to national and community-based partners and resources.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 76

Date: March 7, 2017

Effective Date: March 7, 2017

Subject: Braiding Funds – Youth Program

WIOA does not prohibit the braiding of funds. This resource allocation strategy occurs when different funding streams are used together to support different needs for the same customer while maintaining documentation to support the charging and allocation of cost to multiple funding streams or programs. If a cost benefits two (2) or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the program or activities based on the proportional benefit. In addition, each funding stream maintains its statutory requirements, including eligibility criteria and scope of authorized activities.

Braiding funds allows a WIOA youth program to provide more comprehensive services to youth participants while maximizing partner resources available to assist youth. For example, the Title I WIOA youth program and the WIOA Title II adult education program can provide complementary services to youth and can be used together (braided) to serve eligible youth ages 16-24 where each program's age eligibility overlaps. When used together, these two (2) funding sources can increase the capacity of programs to help young adults meet their employment and educational goals. An organization that receives both Title I youth funding and Title II adult education funding or partners with a program that receives Title II funding may braid these funds and enroll eligible youth into both programs. Title I resources can be used to provide youth with such services as career guidance, exploration and planning, work experiences and leadership development. Title II resources support adult education and literacy activities, including preparation for obtaining a recognized high school equivalency or workplace adult education and literacy activities, family literacy activities, English language acquisitions activities, integrated English literacy and civics education, workforce preparation activities or integrated education and training. Integrated education and training, a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement, is particularly well-suited to a braided funding model.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 77

Date: May 17, 2017

Effective Date: May 17, 2017

Subject: Process for Pre-Apprenticeship/Apprenticeship Certification

Pre-Apprenticeship and Apprenticeships must meet the criteria established by the US DOL Office of Apprenticeship.

NPWDB, Inc. Staff will be responsible for entering a participant's school of training in the MACC system. This phase will be known as a "Pre-Apprenticeship." The participating individual must successfully complete the training program in order for them to enter into the "Apprenticeship" phase.

Once training is completed, a participant can only be referred to a participating employer who has registered; completed the necessary paperwork; and, met the criteria established by the US DOL Office of Apprenticeship. Participating employers must guarantee that full-time, long-term employment (at least 11 months) is available for a participant in order to participate in the region's Apprenticeship Program.

NPWDB, Inc. Staff will be responsible for linking area employers to the US DOL Office of Apprenticeship for registration.

In order to ensure the successful completion of the "Apprenticeship" phase, NPWDB, Inc. Staff will be responsible for completing follow-up on the participant: Once at the half-way mark (approximately 5 ½ months into initial employment); and, At the completion of the initial employment period (at 11 months).

NPWDB, Inc. Staff will be responsible for entering all related Pre-Apprenticeship and Apprenticeship data and information into the MACC system.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 78

Date: May 25, 2017

Effective Date: May 25, 2017

Subject: Supplemental Information

A minimum of one (1) alternate Contact for a Participant is required. The maximum number of alternate Contacts is three (3). The Contact Information is to include: Name; Address; Phone Number; and, Relationship to the Participant.

The Contact Information is to be completed on the Supplemental Form. This Information will be collected by the One Stop Operator Staff Member who conducted the Participant Orientation Process.

At the time of eligibility determination, the Case Manager is to enter this Information as a Case Note in the Participant's MACC File.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 79

Date: May 25, 2017

Effective Date: May 25, 2017

Subject: NPWDB, Inc. WIOA Youth Program Exits

Youth who have not received a service funded by the WIOA Youth Program or funded by a Partner Program for ninety (90) consecutive calendar days and is not scheduled for future services is considered to have exited the Program.

- A. **Program Exit Requirements** --The date of exit is the last date a service that was provided to a Youth Participant. Case Notes in the MACC must include the reason for exit and documentation may be uploaded into the MACC. If the documentation is not uploaded into the MACC, the documentation must be retained in the Youth Participant's program file.
1. The Youth Participant will not be counted in performance if they exit the Program for any of the following reasons:
- a. Deceased – Youth Participant died during participation in a WIOA Program;
 - b. Institutionalized – Youth Participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain institutionalized for at least ninety (90) calendar days;
 - c. Health/Medical – Youth Participant is receiving medical treatment that precludes entry into unsubsidized employment or continued participation in a WIOA Program. This does not include temporary conditions expected to last for less than ninety (90) calendar days;
 - d. Entered into Active Military duty- Youth Participant who is a reservist and has been called to active duty or Youth Participant enlists and reports for active duty which prevents participation in WIOA Title I-B Youth Program;
 - e. Found Ineligible After Registration – Youth Participant is determined ineligible to participate in a WIOA Program; and,
 - f. Foster Care.

2. When a Youth Participant receives services from multiple Programs, the most recent service end date is the date of exit. Follow-Up Services provided to Youth do not extend the exit date.

B. Gaps in Service - A Youth Participant may be placed in a gap in service when a situation arises that will temporarily prevent Program participation for greater than ninety (90) consecutive calendar days. The gap in service will provide time for youth to address barriers to continued participation without exiting the Program. Eligibility does not need to be re-determined at the end of the gap in service.

1. A gap in service extends a Youth Participant's exit date for ninety (90) calendar days from the time he or she is placed into the gap. The gap in service must be related to:

- a. A delay before the beginning of training;
 - b. A health/medical condition, or providing care for a family member with a health/medical condition; or,
 - c. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.
2. A gap in service may be extended for an additional ninety (90) consecutive calendar days (for a total of one hundred and eighty (180) consecutive calendar days) to resolve the issue that is preventing a Youth Participant from completing Program services. The extended gap in service must be related to:
 - a. A health/medical condition, or providing care for a family member with a health/medical condition; or,
 - b. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.
3. All gaps in service must be referenced in case notes detailing the reason for the gap in service.

WIOA Older Youth Exit Decision

1. Is the Youth Participant currently employed, in post-secondary education or advanced training? If no, do not exit; work with Youth Participant to obtain employment or enroll in needed training.

If yes, go to question 2.
2. Is the Youth Participant in post-secondary education or advanced training? If yes, then jump to Question 5.

If no, go to question 3.
3. Is the Youth Participant likely to continue employment through the 4th quarter after the exit quarter? If no, do not exit; work with the Youth Participant to enhance their employment and address any barriers.

If yes, go to question 4.

Has the Youth Participant received a credential or certificate? If yes, then ensure the credential has been entered into the MACC Status Screen, then consult with MACC Coordinator about exiting the Youth Participant.

If no, can the Youth Participant earn a credential? If credentialing seems unlikely, consult with the MACC Coordinator regarding a possible exit.

OLDER YOUTH PERFORMANCE MEASURES (16-24)

Placement in Employment/Education/Training (Q2 Post Exit) – 61%
Placement in Employment/Education/Training (Q4 Post Exit) – 43%
Median Earnings – N/A
Credential Rate – 69%
Measurable Skills Gain – Baseline
Employment Preparation - 70%
Registration at Local American Job Centers (One Stop s) – 100%

WIOA Younger Youth Exit Decision Sheet

1. Did the Youth Participant earn a HS Diploma or GED? If yes, then jump to question 5.
If no, go to question 2.
2. Is the Youth Participant still in school? If no, do not exit; work with Youth Participant to obtain diploma or GED or consult with MACC Coordinator if this seems unlikely.
If yes, go to question 3.
3. Is the Youth Participant a candidate to remain in WIOA Youth? If yes, consult with MACC Coordinator about retaining student.
If no, go to question 4.
4. Has the Youth Participant met all skill goals? If no, do not exit; work with the Youth Participant to obtain skill goals before they expire.
If yes, consult with MACC Coordinator about exiting the Youth Participant.
5. Is the Youth Participant employed, in the military, in post-secondary education or advanced training, or in a qualified apprenticeship program? If no, do not exit; work with the Youth Participant to obtain one of the outcomes above.
If yes, go to question 6.
6. Is the Youth Participant likely to be employed, in the military, enrolled in post-secondary education or advanced training, or in a qualified apprenticeship program through the 4th quarter after the exit quarter? If no, do not exit; work with the Youth Participant to enhance their employment, address barriers, and stabilize their circumstances.
If yes, consult with MACC Coordinator about exiting the Youth Participant.

YOUNGER YOUTH PERFORMANCE MEASURES (14-21)

Placement in Employment/Education/Training (Q2 Post Exit) – 61%
Placement in Employment/Education/Training (Q4 Post Exit) – 43%
Median Earnings – N/A
Credential Rate – 69%
Measurable Skills Gain – Baseline
Employment Preparation - 70%
Registration at Local American Job Centers (One Stop s) – 100%

Skill Attainment Goals

Skill attainment is not an exit outcome; it is an ongoing participation outcome. Do not forget to set from one to three skill goal per year for a Younger Youth Participant. If a Youth Participant is basic-skills deficient, the individual must set at least one basic skills goal. Goals not attained within one year – or by exit – are negative outcomes.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 80

Date: August 2, 2017

Effective Date: August 2, 2017

Subject: Dislocated Worker Outreach Policies & Procedures to Inform Dislocated Workers of Available Training Services

Because individuals are now able to file for Unemployment Compensation online, a significant decrease in Dislocated Workers Traffic Flow has occurred at regional American Job Centers.

In an effort to inform this target group of available training options funded under the WIOA, in particular the Individual Training Account (ITA) Program, the NPWDB, Inc. is putting in place the following Dislocated Worker Outreach Procedures:

No less than every two (2) weeks, Customer Service Representatives (CSR) at the three (3) regional American Job Centers (AJC) are to access the MACC System to extract a list of individuals who recently signed up for Unemployment Compensation. Data Control Coordinators are to assist CSRs with this duty if their time permits.

To extract the list, the following Steps will be followed:

1. Access the "Job Seeker" Screen;
2. Select "West Virginia" as the State and then select the appropriate county. Weirton AJC CSRs will search targeted individuals in Brooke and Hancock Counties; Wheeling AJC CSRs will search targeted individuals in Ohio and Marshall Counties; and, the New Martinsville AJC CSRs will search targeted individuals in Wetzel and Tyler Counties;
3. Select "Region 5;"
4. Then select "Wagner-Peyser" under the "Program & Outcome Details;"
5. Then select "Participant" as the "Program Status;"
6. Enter the appropriate Dates for the two (2) week search in the "Program Status Between" Dates and then hit Search; and,
7. When the Search Results are displayed, Participants that you will need to contact are those that have the "Green UC" displayed next to the MACC ID#. Please make sure to check all Pages if there is more than one Page (Page Total is listed at the bottom right corner of the Search Screen).

Once Participants are identified, the CSRs, or Data Control Coordinators, will then reach out and inform the targeted Individual(s) of available Training Services as follows:

1. **EMAIL** the Participant at the listed Email Address in the MACC System using the Boilerplate Letter provided by the NPWDB, Inc.;

2. If no email is available **CALL** the Participant at the listed phone number(s) in the MACC System and provide them with the same Information that is detailed in the boilerplate letter;
3. If there is no answer/return call from your initial phone call, send the boilerplate **LETTER** to the Participant by using the “Create Correspondence” option in the MACC System. The steps are listed below:
 - A. When you are ready to send Letter, you will follow the above seven (7 Steps again to search for targeted participants. Once Search Screen displays, you will then check the Box to the right of the screen for each targeted participant you need to send a Letter to. Go to the bottom right of the Screen. Under “Bulk Actions,” use the dropdown box and select “Job Seeker Basic Letter Correspondence;”
 - B. The “Correspondence Screen” will appear. You will then copy and paste the boilerplate Letter into the Data Box. Once this is done, hit the “Create Correspondence” tab. The Screen will then display the boilerplate Letter that will print. Proof-read to make certain all information is correct;
 - C. Insert “American Job Center” letterhead into your printer and print; then,
 - D. Once boilerplate Letter is printed, you will need to sign and make a copy. Then you will mail the Letter to targeted participants. You will keep all copies of the Letters emailed/sent in a folder labeled “Training Services Information Letters.”

A Tracking System is to be developed and put in place by the One Stop Manager of all contact made to targeted participants on a monthly basis. This Tracking System will be monitored/evaluated by the NPWDB, Inc. Office on a bi-annual basis during regular Monitoring. Reviews.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 81

Date: August 7, 2017

Effective Date: August 7, 2017

Subject: Employer Customer Satisfaction Survey

American Job Center and Case Management Staff are to ensure the completion of the “Employer Customer Satisfaction Survey” by any Employer who accesses an American Job Center Program and/or Service.

Original Surveys are to be maintained by American Job Center and Case Management Staff until the last day of each month upon which they are to be forwarded to the One Stop Operator Manager. American Job Center and Case Management Staff may provide a copy of the Survey to the participating Employer.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 82

Date: January 31, 2018 Effective Date: January 31, 2018 Modified Date: July 1, 2018

Subject: "Adult Education Technology" Classes at regional American Job Centers

WIOA eligible Participants, Adults, Dislocated Workers and Older Youth, and Core/Required Partner Customers may participate in "Adult Education Technology" Classes offered at regional American Job Centers. It will be the responsibility of One Stop Operator Staff, Case Managers and Core/Required Partner Staff to inform, and recruit, WIOA eligible Participants for Classes.

One Stop Operator Staff will post "Sign-Up" Sheets for interested Participants at each regional American Job Center. Class dates and times will be listed on "Sign-Up" Sheets. New "Sign-Up" Sheets will be updated as needed (once one Class concludes and plans for another one/the next one are put in place). A copy of all "Sign-Up" Sheets is to be maintained by One Stop Operator Staff.

"Adult Education Technology" Classes will start being offered at each regional American Job Center in February, 2018. Class schedules will be determined based on interest and need on an ongoing basis.

Adult Education (Mountain State Educational Services Cooperative) will provide the Curriculum, Instructional Supplies and Certificates for Classes. Adult Education (Mountain State Educational Services Cooperative) will provide the Instructor for Classes held at the Wheeling American Job Center (only). Under the direction and with guidance from Adult Education (Mountain State Educational Services Cooperative), One Stop Operator Staff will be trained to provide same/similar instruction for Classes held at the Weirton and New Martinsville American Job Centers.

One Stop Operator Staff and Core/Required Partners will supply the Participants. The NPWDB, Inc./One Stop Operator Staff will supply the Computers/Printers and Classroom Space. It will be the responsibility of regional One Stop Operator Staff to ensure that all Class Participants sign the Sign-In Sheet. Original Sign-In Sheets are to be submitted to the One Stop Operator Manager on the last day of each month. A copy of Sign-In Sheets is to be provided to Adult Education (Mountain State Educational Services Cooperative).

"Adult Education Technology" Classes will teach Participants and Core/Required Partner customers the following:

- ✓ Beginner Computer Skills;
- ✓ Intermediate Computer Skills;
- ✓ Microsoft Office: Word, Excel, PowerPoint;
- ✓ Windows 10;
- ✓ Identify Theft Protection;
- ✓ Body Language and Getting a Job;
- ✓ Creating a Portfolio to Help Obtain a Job;

- ✓ Job Hunting and Employment Forms;
- ✓ Writing a Resume; and,
- ✓ Finding Jobs in WV.

"Adult Education Technology" Class Schedules/Size of Classes is as follows:

<u>American Job Center</u>	<u>Class Schedule</u>	<u>Size of Class</u>
Weirton American Job Center		At least five (5) Participants/Customers
Wheeling American Job Center		At least ten (10) Participants/Customers
New Martinsville American Job Center		At least five (5) Participants/Customers

After each Class, it will be the responsibility of One Stop Operator Staff to ensure all Computers, Printer(s) and any other Classroom materials. is kept in a locked office, safe or cabinet.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 83

Date: February 21, 2018

Effective Date: February 21, 2018

Subject: Apprenticeship Program – TABE Assessment Tool Test

Adults and Dislocated Workers who are determined WIOA eligible and are accepted/enrolled in an approved Apprenticeship Program do not need to be given the TABE Assessment Tool if they meet the Training Provider's (Union's) program testing/evaluation requirements of the Apprenticeship Program they are enrolling in. A Representative of the Training Provider (Union) must provide hard copy attestation that the individual met the program's testing/evaluation requirements. Hard copy attestation is to be kept in the WIOA Participant's file. If the Training Provider (Union) does not conduct its own program testing/evaluation, then the TABE Assessment Tool must be administered to WIOA eligible Adults and Dislocated Workers in accordance with Local Policy #43.

Older Youth who are determined WIOA eligible and are accepted/enrolled in an approved Apprenticeship Program must be given the TABE Assessment Tool in accordance with Local Policy #43 regardless of whether or not the Training Provider (Union) administers its own program testing/evaluation.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 84

Date: February 28, 2018 – Modified Date: November 8, 2021 - **RESCINDED**

Effective Date: February 28, 2018

Subject: Apprenticeship Program – Drug Testing

On an individual basis, the WorkForce WV Office may approve to accept results of drug tests that are administered by an Apprenticeship Union in place of the State-approved drug test. If this is the case, the NPWDB, Inc. will notify Customer Career Planners/Data Control Coordinators, in writing, of those Unions whose drug test results will be accepted in place of the State-approved drug test. In these instances, it will be the responsibility of Customer Career Planners/Data Control Coordinators to ensure they receive a hard copy of drug test results from the Apprenticeship Union or the WIOA eligible Apprentice. A hard copy of drug test results is to be kept in the WIOA eligible Apprentice's file.

If Customer Career Planners/Data Control Coordinators have not received written notification from the NPWDB, Inc. that the WorkForce WV Office will accept a particular Apprenticeship Union's drug test results, then Customer Career Planners/Data Control Coordinators must ensure the administration of the State-approved drug test, along with the administration of the Apprenticeship Union's drug test, following existing policy/procedures that addresses State-approved drug testing of WIOA eligible participants.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 85

Date: April 10, 2018; Modified Date: November 8, 2021

Effective Date: April 10, 2018

Subject: Pre-Apprenticeship Programs for Youth

Pre-Apprenticeship Programs teach basic, technical and job readiness skills to Youth that helps prepare them for entrance into Registered Apprenticeship Training Programs. Pre-Apprenticeships provide Youth with seamless career pathways by providing them with an opportunity to learn skills necessary for a career with high earning potential, personal growth and continued workplace learning after graduation. Partnerships among business, industry, education, government, parents and the Youth is necessary for success. A Pre-Apprenticeship Program targets Youth, ages 16 – 24, by providing work-based learning opportunities for those who are pursuing a high school diploma or its equivalent. Work-based learning is provided in a real job environment with specific objective and competencies. Pre-Apprenticeship Programs may provide income for the participating Youth and create an environment that requires Youth to relate academics to work-based activities.

A Pre-Apprenticeship Program should expose the Youth to at least one (1) trade to give them a chance to see where their desires and aptitudes lie. Methodologies should include: Hands on Learning; Visiting Employer Sites or Apprenticeship Training Classrooms; and, Various Speakers/Lecturers from area Apprenticeship Training Programs or “High Demand” Industries; and Job Shadowing. A Youth should learn hard skills of the trade: How to use Basic Tools; Mechanical Skills; Soft Skills for the Trade (ie: Literacy, Math /Algebra, etc.); Employability Skills (ie: Work Ethic, Getting Child Care in order, Transportation, etc.); and, Life Skills (ie: Skills to learn to Manage your life, etc.).

Many Pre-Apprenticeship Programs enable Youth to earn credit toward the completion requirements for a Registered Apprenticeship Training Program. While Pre-Apprenticeship Programs are not federally vetted, quality programs have a strong relationship with at least one Registered Apprenticeship Training Program, provide training and curriculum that align with that program and include a wide range of Supportive Services designed specially to ensure a Youth’s success (A Pre-Apprenticeship Program should advise Youth on the preparation requirements necessary for entry into a Registered Apprenticeship Training Program. However, it should be clearly understood by the Youth that entry into a Registered Apprenticeship Training Program is not guaranteed after participation in a Pre-Apprenticeship Program).

The number of required classroom training hours and on-the-job training hours for a Youth Apprentice is to be determined collaboratively by the Pre-Apprenticeship Program Provider and the Registered Apprenticeship Training Program Sponsor on a case-by-case basis. The number of required

classroom training hours and on-the-job training hours for a Youth Apprentice will vary, case by case, depending on the specific requirements of the Registered Apprenticeship Training Program Sponsor. The duration of the Pre-Apprenticeship Program can be no less than 8 weeks. A Youth Apprentice, in high school, must be at least 16 years old and pursuing a high school diploma or equivalent or must be a high school graduate, a high school completer, have completed the TASC or currently be enrolled in an academic program that will lead to a diploma (If a Youth Apprentice, in high school, drops out of school, he/she will be dropped from the Pre-Apprenticeship Program and risk losing their job. Employers who encourage a Youth Apprentice to drop out may have their program terminated). Youth should also be pre-screened to be sure he/she is able to work and participate and must be provided with Safety Training, First Aid Training, CPR, etc., as appropriate and necessary.

The process for developing a Pre-Apprenticeship Program for Youth should include:

1. Research of jobs that are in “high demand” industries (Research into jobs that are in “high demand” non-traditional occupations is encouraged) by using the most current labor market data. Identify the skills required for those jobs. Then, approach a Representative(s) from that industry to offer tours, job shadowing, internship, and other Pre-Apprenticeship experiences for participating Youth;
2. Disseminate information to Youth who may be interested in being an Apprentice, including Youth who have completed some technical education. Ask area School Guidance Counselors to notify you when a Youth has an interest in an area where no technical education program or academic class exists. Provide open houses for parents, counselors, and ask Representatives from the “high demand” industries to participate. (In order to effectively recruit Youth for participation, you will need to develop strategies to promote the Pre-Apprenticeship Program to not only Youth, but their parent(s). A brochure or fact sheet should be developed which clearly explains what the Pre-Apprenticeship Program is, how it works, whom it will benefit, the eligibility criteria, what occupations are available for training and who the Youth or parent(s) should contact for more information);
3. Check to see if there are any businesses that practice a specific trade in a particular skill area. Contact Trade Associations or make a list of potential sites for Apprentices and contact them personally. Develop a plan for informing local employers about the Pre-Apprenticeship Program and encourage them to hire Youth Apprentices;
4. Talk with Youth about their chosen career and what they will be expected to do and to learn. Discuss with the Youth, and their parent(s), the Youth’s strengths and weaknesses and if the Pre-Apprenticeship Program is a good match. Make sure the Youth has the prerequisite skills needed for the experience and the appropriate clothing and accommodations needed for the particular work site;
5. Match the Youth with an employer. The employer has to agree to train the Youth Apprentice in accordance with the training outline. The Youth Apprentice agrees to work on assigned tasks and to learn related instruction the work based training component includes competencies that must be mastered on the job;
6. Assist the employer with identifying a qualified “Mentor” at the work site. A Mentor should be skilled in the craft, skilled in teaching and have the temperament and willingness to work with young people. Provide all the necessary Pre-Apprenticeship information and documents to the Employer and Mentor, including any legal or insurance issues about which they should be aware. Enter into a Pre-Apprenticeship Agreement with the participating Employer. The Pre-Apprenticeship Agreement should outline training competencies and goals and include a progressive wage scale during the training period;

7. After recruiting an industry “partner” to enter into a Pre-Apprenticeship Agreement, draft a Pre-Apprenticeship Training Plan/Training Outline. The Plan/Outline should be detailed and based on industry standards and include prerequisite education and training, industry competencies, related academic training linked to academic standards and evaluation procedures. Get input from the participating industry “partner” and the school to input on the Plan/Outline. The Plan/Outline must clearly define the terms and conditions of employment, training, supervision and evaluation. Some other key components required in the Training Plan/Outline are:
 - Type of employment and training of the Youth Apprentice in a skilled Occupation;
 - Identification of the terms of the Pre-Apprenticeship (completed as a time-based, competency-based or hybrid, etc.);
 - An outline of the work the Youth Apprentice will receive;
 - Supervision at the work site to be provided;
 - Provisions for organized, related instruction in technical subjects related to the occupation;
 - Schedule of wage increases;
 - Periodic review and evaluation of the Youth Apprentice’s performance on the job and in related instruction;
 - Details of the probationary period;
 - Description of safe equipment and facilities available for training;
 - Minimum eligibility requirements;
 - Placement procedures of the Youth Apprentice;
 - EO Policies and Procedures;
 - The ability to transfer a Youth Apprentice from one program to another, if applicable; and,
 - Recognition for successful completion of the Pre-Apprenticeship Program (Certificate, etc.);
8. Schedule the Youth’s work days based on how much time is needed to learn the skills outlined in the Training Plan/Outline. The Youth Apprentice’s hours should be set according to the employer’s schedule/employer’s business hours. Schedule a day and time that is convenient to visit the employer at the work site. This will give you an opportunity to discuss any questions the employer might have as well as giving you an opportunity to become familiar with the site where the Youth will be working. Talk with the employer about how the Youth’s safety will be ensured. If a Youth needs accommodations at the work site, agree on who will make the arrangements. Discuss with the employer any legal and risk management issues. Make sure the employer has the appropriate insurance coverage for the Youth Apprentice. Areas of instruction related to the Pre-Apprenticeship should be coordinated and provided to the Youth Apprentice. For example, if a Youth Apprentice needs algebraic skills at the work site, arrange the Youth’s schedule to include an algebra class. If a Youth needs keyboarding skills, he/she may receive tutoring before or after their work day; and,
9. Maintain regular contact with the Youth Apprentice and the employer to assess progress, conduct, commitment and to ensure that the worksite is providing participating Youth with the agreed upon learning opportunities. During the training period, regular visits should occur with the Youth Apprentice and the employer in order to provide assistance and to ensure the program is operating within guidelines.

Maintain contact with the Youth Apprentice’s worksite “Mentor” to gauge the direction of learning and the level of satisfaction for all involved. During the training period, the employer evaluates the progress made by the apprentice both on the job and in the classroom

satisfactory progress results in wage increase for the Youth Apprentice. Formal evaluations should be conducted regularly. Evaluations should gauge the level of competence related to the identified industry standards, as well as, evaluate the Youth's workplace skills.

The final evaluation, with input from the employer, should include identification of the specific skills the Youth Apprentice has learned and be reported in a way that he/she can use them to connect to the next skill level in a Registered Apprenticeship Program, a job, or further education. Also, assessing the experience with the employer and mentor can prove helpful to improving future Youth Apprenticeships. All Youth Apprentices and participating employers should receive some form of recognition with a certificate.

Some of the roles and responsibilities of participating stakeholders are as follows:

I. Responsibility of the Youth Apprentice.

- Comply with guidelines established for the Pre-Apprenticeship Program;
- Commit to a long term occupational and educational program;
- Maintain a copy of your Apprenticeship training records;
- Obtain a work permit if you are under the age of 18; and,
- Maintain satisfactory performance in the work-based and school-based environments.

II. Responsibilities of Parents.

- Provide consent for the Youth to participate in the Pre-Apprenticeship program;
- Provide the Youth Apprentice encouragement to perform at a high level of academic and technical skill attainment; and,
- Meet with the school and employer during the duration of the Pre-Apprenticeship Program.

III. Responsibilities of Businesses.

- Interview and select a Youth Apprentice (A Youth must undergo an employment interview with the employer for the positions available);
- Be a participating worksite sponsor. Identify a worksite mentor (ie: Supervisor);
- Conform to all Federal and State Child Labor Laws before beginning the employment of any Youth Apprentice under the age of 18;
- Maintain Youth Apprenticeship training records;
- Certify technical skill proficiency;
- Provide an appropriate and safe work environment for the Youth Apprentice;
- Pay a progressive wage to the Youth Apprentice (if Youth Apprentice is paid); and,
- Assess the Youth Apprentice's progress.

IV. Responsibilities of Schools.

- Assist with Youth Apprentice selection;
- Assist in coordinating school-based and work-based learning activities; and,
- Promote Youth Pre-Apprenticeships with youth, local business and industry.

Additional local Standards can be established and will vary depending on local needs. Employers, parents and other Program stakeholders should determine local Program Standards, like, "How much credit

should the Youth Apprentice receive for successful completion of the Pre-Apprenticeship?" Or, "How will the Youth Apprentice be monitored?" Or, "If Youth falls below established grade point average (during school), will he/she be given a grace period to improve the grade?" Or, "What steps will be involved in the screening process that determines which Youth will be allowed to participate in the Pre-Apprenticeship Program?" Or, "How does the Youth apply for acceptance?" Or, "What are the rules that must be followed by the Youth Apprentice during his/her participation concerning attendance, summer experience, termination of an agreement or other considerations?" Or, "How are Youth and parents notified of acceptance into the Pre-Apprenticeship Program?" Or, "What are the procedures for employers conducting interviews of Youth Apprentices?" Or, "What are the procedures for assigning Youth to a workplace once they successfully complete the interview?" (Students can be randomly selected or employers can indicate their choices of particular students and work out specific assignments with other participating employers).

Additional local Standards developed, which must be objective, fair and not discriminate against any Youth, must first receive written approval from the NPWDB, Inc. prior to implementation. Also, program and recruitment materials, application processes, evaluation processes, training records and other program processes and standards must first receive written approval from the NPWDB, Inc. prior to implementation.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 86

Date: July 10, 2018

Effective Date: July 10, 2018

Subject: Description of Projects and Programs funded with federal (ie: WIOA) Funds.

When issuing statements, press releases, Requests for Proposals and other documents describing projects and/or programs funded in whole or in part with federal (ie: WIOA) funds, you must include:

1. The percentage of the total costs of the project and/or program which will be financed with federal (ie: WIOA) funds;
2. The dollar amount of federal (ie: WIOA) funds for the project and/or program; and,
3. The percentage and dollar amount of the total costs of the project and/or program that will be financed by non-governmental sources.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 87

Date: July 17, 2018

Effective Date: July 17, 2018

Subject: Career Workshops for Day Report Center (DRC) Participants at regional American Job Centers

One Stop Operator Staff is responsible for conducting Career Workshops for Day Report Center (DRC) Participants at regional American Job Centers no less than two (2) times each month.

The following steps will be adhered to when conducting Career Workshops for DRC Participants:

1. Using the "DRC Participant Career Workshop" Form, One Stop Operator Staff is to detail their Lesson Plan for each Career Workshop to be conducted during the month being reported. One Stop Operator Staff will list all instructional materials, handouts, supplies, etc. to be used;
2. The completed "DRC Participant Career Workshop" Form is to be provided to the One Stop Operator Manager for prior written approval no later than ten (10) days before the month the two (2) Career Workshops will be held;
3. The One Stop Operator Manager will provide written approval of One Stop Operator Staff's proposed Lesson Plans and requested instructional materials, handouts, supplies, etc. requested to be used within two (2) days; and,
4. The One Stop Operator Manager will then provide a copy of the approved "DRC Participant Career Workshop" Form to the NPWDB, Inc. Administrative Coordinator within two (2) days.

One Stop Operator Staff are expected to strictly adhere to approved Lesson Plans and instructional materials, handouts, supplies, etc. to be used at Career Workshops. No changes to Lesson Plans and/or instructional materials, handouts, supplies, etc. are to be initiated without prior written approval from the One Stop Operator Manager.

Career Workshops instruction can include, but is not limited to:

- ☐ Introduction to/Overview of American Job Center Programs and Services;
- ☐ Soft Skills Training;
- ☐ Resume & Cover Letter Writing;
- ☐ Workplace Safety Training;
- ☐ Employee Safety Training;
- ☐ Managerial Training;
- ☐ Technical/Technology Training;
- ☐ Basic Computer Skills Training;
- ☐ Professional Development;

- ❑ Interviewing Techniques (including Mock Interviews);
- ❑ Life Skills Training;
- ❑ Job Networking and Job Search Activities;
- ❑ Work Readiness Training;
- ❑ Career Exploration, Career Pathways, Development of a Career Portfolio that details career goals and objectives;
- ❑ Workplace Etiquette;
- ❑ Educational Opportunities;
- ❑ Employee Ethics Training;
- ❑ Employability Skills Training;
- ❑ Communication and Inter-personnel Skills Training; and,
- ❑ Stress Management.

One Stop Operator Staff is encouraged to invite Guest Speakers to talk to DRC Participants at Career Workshops about career/job opportunities, available Programs and Services, etc.

At no time is One Stop Operator Staff to leave DRC Participants unattended.

After each Career Workshop has concluded, One Stop Center Staff is to provide the One Stop Center Manager with copies of all classwork completed by DRC Participants, as well as “DRC Participant Sign-In Sheets.”

The NPWDB, Inc. Administrative Coordinator will be responsible for monitoring Career Workshops, announced and unannounced visits, and all classwork completed by DRC Participants no less than once per quarter.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 88

Date: August 14, 2018

Effective Date: August 14, 2018

Subject: "Adult Education Technology" Classes at regional American Job Centers

On days One Stop Operator Staff and/or Customer Career Planners/Data Control Coordinators administer the TABE Test and the Work Readiness Test to WIOA eligible Adults, Dislocated Workers and Older Youth, it will now be required to also have these target groups participate in an "Adult Education Technology" Class at a regional American Job Center. Please adhere to terms and conditions detailed in Local Policy #88 - "Adult Education Technology Classes at regional American Job Centers" when serving these target groups.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 89

Date: December 13, 2018

Effective Date: December 13, 2018

Subject: Employer Outreach - Business Programs & Services

All One Stop Operator Staff, excluding the One Stop Operator Bookkeeper, is required to meet with area Employers at their worksites in an effort to promote available Business Programs & Services.

One Stop Operator Staff is to have no less than two (2) onsite visits with area Employers per week.

One Stop Operator Staff will detail all onsite Employer visits on the "Employer Outreach" Report on a monthly basis.* Once completed, all "Employer Outreach" Reports are to be submitted to the One Stop Operator Manager by no later than five (5) days after the end of the month being reported. The One Stop Operator Manager will then submit all completed "Employer Outreach" Reports to the MACC Coordinator/Property Officer at the NPWDB, Inc. Office by no later than eight (8) days after the end of the month being reported.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

*Only onsite visits with Employers are to be detailed. Phone calls to area Employers to arrange possible onsite visits are not to be reported and will not count towards the required two (2) onsite visits per week.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 90

Date: January 15, 2019

Effective Date: January 15, 2019

Subject: "Transitional Job Training Program" Participants

Because the "Transitional Job Training Program" is a temporary, short-term training program, "Transitional Job Training Program" Participants will be permitted to participant in the "Individual Training Account Program" or the "On-The-Job Training Program" after participating in the "Transitional Job Training Program."

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 91

Date: April 16, 2020

Effective Date: April 16, 2020

Subject: Customer Satisfaction Survey

American Job Center and Case Management Staff are to ensure the completion of the “Customer Satisfaction Survey” by all customers who access an American Job Center Program and/or Service.

Original Surveys are to be maintained by American Job Center and Case Management Staff until the last day of each month upon which they are to be forwarded to the One Stop Operator Manager. American Job Center and Case Management Staff may provide a copy of the Survey to the customer.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 92

Date: May 17, 2023

Effective Date: May 17, 2023

Subject: Stipends for WIOA eligible Youth Participants

A Stipend is a fixed regular small payment made to a WIOA Youth Participant during his/her enrollment in a specific classroom-type Activity/Service (seat/participation time payments).

A Stipend is used to encourage an WIOA eligible Youth's participation in a WIOA funded Activity/Service. It may be paid to a Youth Participant for his/her successful participation in and completion of an Education or Training Activity/Service, like Workshops, Expos, Forums, etc.

A Stipend may be awarded for the following activities:

- Clinical work experience associated with classroom training which is based at a physical location;
- Attendance at Adult Basic Education classes (working towards obtaining high school equivalency certificate);
- Attendance at secondary school;
- Attendance at alternative school;
- Attendance at Adult Basic Education classes for the purpose of basic skills enhancement (individual must be basic skills deficient); and/or,
- Participation in community service projects, service-learning projects, job shadowing.

A Stipend must be paid based on actual hours of attendance. Attendance in the Activity/Service must be documented as the basis for the stipend payment. An Attendance Sheet must be signed by the Youth Participant, a YSS, Inc. Youth Program Staff Member and a NPWDB, Inc. Youth Coordinator(s) before payment can be made. The Attendance Sheet must be maintained in the Youth Participant's file.

If a WIOA Youth Participant is being provided a stipend because of his/her participation in a specific classroom-type Activity/Service, he/she may also be provided food and/or a beverage should their participation coincide with breakfast, lunch and/or dinner time. Breakfast time is defined as between 7:00 am – 10:00 am; Lunch time is defined as between 11:00 am – 1:00 pm; and, Dinner time is defined as between 4:00 pm – 6:00 pm. Food and beverage (non-alcoholic) costs must first be determined to be reasonable and necessary by the NPWDB, Inc. prior to any purchases being made. Written documentation must be maintained.

If a Speaker(s), or Special Guest, has been invited to make a presentation to WIOA eligible Youth directly related to the subject matter(s) at a sponsored Workshop, Expo, Forum, etc., he/she will be offered food and or a beverage (non-alcoholic) should he/she be present during a meal time.

Any materials purchased for a WIOA eligible Youth during he/her participation in a Workshop, Expo, Forum, etc. must be specifically related to the subject matter and be determined to be necessary and reasonable by the NPWDB, Inc. prior to any purchases being made. Written documentation must be maintained.

The Youth Participant must sign off that he/she received the Stipend. The Sign-Off Sheet must be maintained in the Youth Participant's file.

The amount of the Stipend will be \$10.00 per hour. A Stipend will be awarded in the form of Walmart gift card or a check made out directly to the Youth Participant. The maximum amount of a Stipend will be up to \$599.00 per Youth Participant per program year. The Stipend amount will be determined based the yearly WIOA Youth Budget Award (A Stipend in the amount of \$600.00 or more would subject the Youth Participant with having to pay income tax, with a 1099 tax form being sent to them).

A Stipend will not be awarded to a Youth Participant for any self-paced, on-line training Activity/Service.

A Stipend may not be provided to a Youth Participant in the On-The-Job (OJT) Program.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 93

Date: August 16, 2023

Effective Date: August 16, 2023; MODIFICATION DATE: OCTOBER 3, 2023

Subject: Allowable & Disallowed Costs for WIOA eligible Individuals/Participants, Subgrantees, Subrecipients, Service Providers and Partnering Agency Staff

This policy provides guidance on allowable and disallowed WIOA program costs, including food and beverage expenses.

Definitions:

Sub-grantee: The government or other legal entity to which a subgrant is awarded and which is accountable to the grantee for the use of the funds provided (ie: Workforce WV).

Sub-recipient: A non-federal entity that receives an award from a pass-through entity to carry out part of a federal or state program; this does not include an individual that is a beneficiary of such a program. A sub-recipient may also be a recipient of other federal awards directly from a federal awarding agency.

Service Provider: An operator of, or provider of, aid, benefits, services, or training to: Any program or activity that receives WIOA Title I financial assistance from or through any State or LWDB grant recipient; or, Any participant through that participant's Individual Training Account (ITA); or, Any entity that is selected and/or certified as an eligible provider of training services to participants.

Factors Affecting Whether a Cost is Allowable: Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under federal awards:

- Be necessary and reasonable for the performance of the federal award and be allocable thereto under these principles.
- Conform to any limitations or exclusions set forth in these principles or in the Federal award as to type(s) or amount(s) of cost items.
- Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-federal entity.
- Be accorded consistent treatment. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost.
- Be determined in accordance with Generally Accepted Accounting Principles (GAAP), except for state and local governments and Indian tribes only, as otherwise provided for.

- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period. Refer to 2 CFR 200.306(b).
- Be adequately documented. Refer to 2 CFR 200.300 through 2 CFR 200.309.

Reasonability of the Cost: “Do I have the capacity to use what I am purchasing?” The sub-recipient must provide a narrative on efficient and effective use when requesting WIOA funds and drawdowns from Workforce WV. “Did I pay a fair rate?” “Do I have documentation to support a fair rate was paid?” “If I were asked to defend this purchase, would I be comfortable doing so?” Hard copy documentation must be maintained.

Necessary: “Is this item or service needed to meet grant goals?” “Is this the minimum amount I need to spend to meet my need?”

Repetition and Frequency. Costs are similar to that which would be incurred by a reasonable and prudent person.

Internal and External Customer Definitions:

- **External Customers:** Participants, partnering agency staff, employers and local WDB members, etc. are considered “external customers.” Professional colleagues would normally be considered individuals outside of the organizations influence but sharing common interests and goals of the organization.
- **Internal Customers:** Local WDB staff (administrative and/or program), local service providers and local sub-recipients are considered “internal customers.”

Examples of Internal vs. External Customers: Below are four (4) examples to help differentiate between sub-grantee employees (local WDB staff), service providers and sub-recipients as either external or internal customers:

- **Example One:** There is a meeting where thirty (30) employers are invited and ten (10) local WDB staff members are in attendance to offer technical information to

the proceedings. In this case, employer attendees are considered external customers. This is an example of an allowable cost. In this example, food costs are allowable because employers are considered the attendees.

- **Example Two:** There is a meeting during regular business hours (not breakfast/lunch hours) where five (5) partner staff is discussing, debating, and planning activities with ten (10) local WDB staff members in attendance. In this case, local sub-grantee staff attendees are the majority of attendees and considered internal customers. Purchase of food with WIOA funds is not allowable in this scenario. because local WDB staff is considered the attendees.
- **Example Three:** Local WDB staff are giving technical assistance to service delivery staff and providing lunch is reasonable and necessary due to heavy traffic that would hinder productivity. This is an example of an allowable cost. In this example, food costs are allowable so long as they are reasonable and necessary, which is true due to the burden of time that traffic and logistics would impose productivity (ie: during a conference).

- **Example Four:** WIOA funds may not be utilized on expenses associated with staff holiday gatherings or social gatherings. Gatherings of this nature that may include a "technical assistance" component are not permitted in regards to utilization of WIOA funds, as the main purpose of the event is not technical assistance. While a technical assistance component may be present, the atmosphere of a gathering (renting a facility, buffets, etc.) is not within the confines of necessary and reasonable, if the technical assistance time is much less than the social or networking time.

Food and Beverages: Are an allowable expense using WIOA funds when technical assistance is provided between two parties, namely local WDB administrative and/or program staff in a meeting with sub-grantees, service delivery staff, board members, partners, etc. or during conferences where the majority of intended invitees are external but share common goals in program delivery. The spirit or purpose of the event must be in accordance with activities that incorporate progressive development of the WIOA program.

The cost of food and beverages will not be considered an allowable cost unless the cost serves a public purpose.

Costs of meetings and conferences, where the primary purpose is the dissemination of technical information, are allowable. This includes costs of meals if the cost is of a type generally recognized as ordinary and necessary for the operation of the non-federal entity or the proper and efficient performance of the federal award. Agencies sponsoring a conference may provide light refreshments to agency employees attending an official conference. Light refreshments for morning, afternoon, or evening breaks are defined to include, but are not limited to: coffee, tea, milk, juice, soft drinks, donuts, bagels, fruit, pretzels, cookies, chips or muffins.

Alcoholic beverages are disallowed under any circumstances.

Expenses During Travel: Costs incurred by local WDB employees and/or Board Officers/Members for travel, to include subsistence and incidental expenses, must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the non-federal entity. Costs for meals during travel must justify that: Participation of the individual is necessary to the federal award; and, Costs are reasonable and consistent with the non-federal entity's established travel policy.

Reasonable costs must be in accordance with the per diem and travel rates allowed by local Travel Policies.

Working Lunches: The cost of a "working lunch", with external customers and other colleagues, is only considered reasonable and necessary when there is adequate documentation for the necessity of having a meeting during a meal time instead of during normal business hours. Validating documentation should specify: What employment, training, and administration-related subjects (e.g. technical assistance components) were discussed; Include a list of participants; and, Dated, itemized meal cost receipts.

Technical Assistance Meetings and Conferences: The cost of meetings and conferences (examples could include, but are not limited to: lodging, facilities, food, beverages, materials, and supplies) where the primary purpose is to provide technical assistance and is necessary and reasonable for successful performance under the federal award is allowable.

Outreach Costs: Associated with promoting WIOA activities, programs, services, including American Job Center (AJC) location information and participant recruitment at job fairs in the local area are considered allowable costs.

Outreach activities are encouraged as a way to meet the needs of customers and to fulfill grant objectives. 29 CFR 38.40 of the WIOA states "recipients must take appropriate steps to ensure they are providing equal access to their WIOA Title I financially- assisted activities programs and services. These steps should involve reasonable efforts to include members of various groups protected by these regulations including, but not

limited to: persons of different sexes, various racial and/or ethnic national origin groups, various religious, individuals with limited English proficiency, individuals with disabilities and individuals in different age groups. In order to achieve this requisite component of affirmative outreach, the regulations contemplate a variety of outreach methods such as advertising the sub-recipient's activities, programs and services in the media, such as newspapers or radio programs, or sending notices about openings in the sub-recipient's activities, programs and/or services to schools or community service groups.

The NPWDB, Inc. may create an outreach plan that details how the purpose of each outreach activity is linked to the program's objectives and indicators and how they would help meet performance outcomes or program objectives for the region. Part of the NPWDB, Inc.'s success and ability to meet expected performance outcomes will depend on how well it

communicates and promotes benefits of the activities, programs and/or services to the communities it plans to serve. The NPWDB, Inc. will initiate meaningful efforts to ensure outreach activities and/or materials are inclusive of the community it is trying to recruit and serve. In addition to communicating with potential participants, outreach targets can include efforts to engage businesses as well. The NPWDB, Inc. can engage in a variety of activities to effectively conduct outreach to their customers, including employer customers, and educate the public about the services.

Defining Advertising and Public Relations: A common misconception is that federal workforce development grant funds cannot be spent on outreach, such as advertising and public relations. *These activities are not only allowable but are necessary to reach both businesses and job seekers.* The key is to make sure that we are promoting federally-funded activities, services and programs and not solely promoting the organization's name (NPWDB, Inc.) recognition or image.

Advertising is an allowable cost, and appropriated for outreach for WIOA activities, services, programs as described in 2 CFR 200.421(b)* of the WIOA. Advertising is allowable through various media strategies, such as print, electronic/digital radio, social media, billboard/signage, text apps and Quick Response (QR) codes. Allowable activities can include promoting program outreach and other specific purposes necessary to meet the requirements of the federal funding award(s). The media strategies used to conduct outreach to the public might be "personnel" or "non-personnel" costs and must promote activities, programs and services of the federal funding award(s).

* 2 CFR 200.421(b) - The only allowable advertising costs are those which are solely for: (1) The recruitment of personnel required by the non-federal entity for performance of a federal award (See also § 200.463); (2) The procurement of goods and services for the performance of a federal award; (3) The disposal of scrap or surplus materials acquired in the performance of a federal award except when non-federal entities are reimbursed for disposal costs at a predetermined amount; or, (4) Program outreach and other specific purposes necessary to meet the requirements of the federal award.

Public relations on the other hand includes activities that promote federally-funded activities, programs and services and are typically "personnel costs." Some public relation activities include, but are not limited to: attendance at, facilitation of, collaboration with, or participate in job/career/community fairs, rapid responses events; one stop satellite centers/mobile one-stops; community access points; high school/college career day; podcasts and other interviews; Etc. While advertising federally-funded activity, service and program offerings might be present at a public relations event, public relations differ from advertising in that staff typically interact directly with the community, public or press during public relation activities.

Public relations are an allowable outreach costs for grant activities, services and programs. The Uniform Guidance at 2 CFR 200.421(d)* of the WIOA describes allowable public relations activities and 2 CFR 200.421(e)** of the WIOA lists unallowable public relations activities as well as general rules of thumb to apply when determining what public relations are allowable or unallowable.

*2 CFR 200.421(d) -The only allowable public relations costs are: (1) Costs specifically required by the federal award; (2) Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of the federal award (these costs are considered necessary as part of the outreach effort for the federal award); or, (3) Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of funding opportunities, financial matters, etc.

**2 CFR 200.421(e) - Unallowable advertising and public relations costs include the following: (1) All advertising and public relations costs other than as specified in paragraphs (b) and (d) of this section; (2) Costs of meetings, conventions, convocations, or other events related to other activities of the entity (see also § 200.432), including: (i) Costs of displays, demonstrations, and exhibits; (ii) Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events; and, (iii) Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings; (3) Costs of promotional items and memorabilia, including models, gifts, and souvenirs; (4) Costs of advertising and public relations designed solely to promote the non-federal entity.

The NPWDB, Inc. may have Memorandums of Understanding (MOUs) in place with American Job Center (AJC) partners that describe combined costs for advertising and public relations outreach that encompass services offered by all partners. Infrastructure costs might include media platforms (print, electronic, radio, social media, billboards/signage, text apps, QR codes, etc.) describing one stop partner activities, services and programs. Infrastructure Agreement (IFA) costs may identify instances and potentially additional associated costs for supply purchase customization where these purchases are specific to grant outreach activities.

Outreach activities that promote activities, programs and services of the federal funding award(s) is an effort to educate, enroll, employ or extend referrals to customers with interests in publicly-funded workforce development system efforts. For example, execution of this strategy might include supplies bearing the one-stop delivery identifier as well as a QR code or website that is owned, managed and updated by the NPWDB, Inc. and/or signatories to a MOU and directs the public to more information about AJC activities, programs and services and other workforce programs.

The first step is assessing if the advertising and/or public relations cost is an allowable cost to the federal funding award(s) and to determine if the cost is necessary. Some questions to consider are: “Is this cost necessary for the performance of the grant(s)?” “Will this cost assist the organization in achieving its grant’s outcomes and goals?” Another step is assessing if the allowable cost to a federal funding award(s) is reasonableness. When testing for reasonableness of a cost, consider the “prudent person theory.” In the “prudent person theory,” the following factors must be considered:

- Would a prudent person use federal funds to purchase such items?
- Would you have used your own funds to purchase such items?
- Do internal controls (MOU/IFA, policies, sub-recipient agreements, contracts, etc.) exist that designate/describe outreach activities and/or limits?
- Is the funding award(s) receiving a benefit and if so, are costs properly allocated based on the relative benefit received?
- If costs are to be shared with other funding streams, are costs being allocated properly?

As an example, if the NPWDB, Inc. distributes commemorative coins that simply list the name of its organization or just the name of a particular program with no contact information and hands them out, a prudent person would view these as not advancing awareness of the program’s services or employment for participants. These would be considered memorabilia, gifts or souvenirs, and would not be allowable under the Uniform Guidance. On the other hand, if the NPWDB, Inc. was trying to inform young parents about activities, program and services while attended a community event to promote its federally-funded activities, programs and services and provided a tote bag with the name of the federally-funded program(s)

and contact information as a way for individuals to find out about services funded by the federal award(s), a prudent person would find that cost reasonable. The tote bag, used as an outreach tool, would benefit the program by recruiting potential participants using a very low-cost item that would be re-used and seen, and thus help potential participants access those program services. These costs would be reasonably calculated to help increase enrollment as opposed to just commemorating an event or promoting an organization itself and not the federally-funded activities, programs and services.

Below is a list of several examples of activities and platforms allowed with federally funded award(s):

- Attending a local fair with materials about where to go to get help with finding a job, developing a resume, obtaining career advice and learning interview skills is allowable. For each type of special or targeted population, the NPWDB, Inc. may need a unique method or strategy for locating, attracting and retaining participants in activities, programs and services. Consider meeting potential participants at community locations such as: libraries, religious institutions, laundromats, grocery stores, fairs, industry events and other local events. Reach out to local businesses like: barber shops and hair salons, movie theaters, sporting events and restaurants and ask them to post and share the organization's poster or sign to educate customers about available federally-funded activities, programs and services.

- Consider which organizations are trusted by local communities, and where information can create subsequent "word-of-mouth" information sharing. Local businesses may also allow American Job Center staff and partners to join existing events they are planning, or they may permit grantees to use their location as a venue for outreach and enrollment events to promote federally-funded

opportunities. In addition to asking community partners and community leaders to spread the word that regional AJCs are providing federally-funded activities, programs and services, it is important they have enough information about the activities, programs and services being provided and where individuals might find value, so that they are able to refer individuals to the organizations that can best help them.

- One could consider setting up a recruitment display table so that information about federally-funded programs and services provided by regional AJCs can be distributed. It is appropriate to have advertising materials to promote the program such as: brochures, pamphlets, or flash drives at a public relations event. Materials created to achieve program objectives/outcomes and for the purpose of outreach at in-person events, and to facilitate engagement between AJC staff and the public are allowable. Materials used to educate the public about federally-funded activity, program and service offerings are allowable and encouraged.
- Printed outreach materials are by far the most popular format for outreach campaigns and are allowable costs. They can include a variety of items such as: advertising and written articles in the local newspaper or neighborhood newsletter, informational postcards, brochures and flyers, doorknob hangers, pamphlets, and leaflets. Other examples may also include: bus stop signage, benches, banners, billboards, vehicle wraps, etc. QR codes may also be used in print media to direct potential participants to online information on the federally-funded activities, programs and services. Section 29 CFR 38.40(b) of the WIOA specifically authorizes use of "notices about openings in the programs and/or activities to schools and community service groups that serve various populations." This method educates, enrolls, employs, and/or extends referrals to customers with interests in federally-funded workforce development efforts.
- Local radio and TV stations are a great way to advertise federally-funded activities, programs and services and are usually cost effective for media coverage. AJC Staff should research and reach out to members of the media who may cover topics related to the federally-funded award(s). There may be a specific radio or TV station reporter who covers a particular neighborhood or local community. For media engagement, consider public service announcements (PSAs) and press

releases. If there is no advertising budget, sharing radio PSAs or coordinating on-air interviews with local radio stations is another way to build awareness of the services and supports provided by the federally-funded award.

- Having a website is an excellent way to provide practical information about how participants can access federally- funded activities, programs and services. The NPWDB, Inc. benefits from keeping its website current and easy to navigate, especially if using QR codes that direct individuals to the site to remind people of the federally- funded activities, programs and services or a specific event. Websites funded with federal funds must meet the accessibility requirements established by section 508 of the Rehabilitation Act of 1973.
- Email communications remain a useful way to disseminate information to participants and to potential partners in and outside the regional workforce system. Signature lines can include an additional website link, QR code or description of an upcoming event or workforce activities, services, and/or program offerings. Use plain language wherever possible.
- Text Messaging (SMS) Applications: AJs can continue outreach to program participants with text messaging applications. These may be particularly well-suited because they communicate with participants in real time (ie: those that pair participants with case managers). Additionally, this modality is a way to remind participants of upcoming appointments or outstanding documents, to promote a new program/service offering, or to blast out employment opportunities. Text messaging applications can also bolster traditional and effective word-of-mouth outreach by prompting participants who may be in the company of other potential eligible candidates to speak about the opportunity, to put it on their social media accounts, or to forward the text to others who may benefit. Another advantage of some texting tools are functions that can automate messages to go out at certain times to groups of people, and even to track analytics. Such data can be helpful for programs to use to adapt their outreach. As with all activities, it is very important to ensure privacy of participant data. Also, it is important to review the data privacy policies of these text messaging applications and other social media platforms.
- The use of federal funds to create social media accounts, such as Instagram, Facebook, LinkedIn and other platform accounts to promote federally-funded activities, programs and services offered, raise awareness of the program and strengthen relations with the community is an effective way to virtually connect with customers regardless of distance. This is not an exhaustive list. However, we must comply with the federal funding award(s) terms, especially those for prohibited platforms/vendors. For instance, it is allowable to follow other local community-based organizations on social media, like their Facebook stories, congratulate their progress on LinkedIn and share photos and short clips of them on Instagram (and do not forget to tag them!). These are all cost-effective ways to create a social media presence online. Please note, there may be federal or state laws that prohibit the use of certain platforms, so it is important to be aware of any restrictions before use. In addition, federal funding award(s)'s terms may prohibit certain activities, such as lobbying. These restrictions apply to social media activity as well. For more ideas on how to develop social media strategies, you can view the webinar: Yes, WIOA Can! Post, Like, Follow, Share! Using Social Media as an Outreach and Marketing Tool.
- Quick Response Codes (QR Codes). QR codes are a square holding a barcode-like graphic, comprised of machine-readable information. When someone uses a cell phone to take a picture of the QR code, the phone recognizes the machine-readable information, and can then go to a specific website. QR codes are a quick way to disseminate information and are used in every facet of life, from viewing a menu at a restaurant to shopping. These codes can provide information about a product or service, which is then delivered quickly to a user's device. QR codes require minimal space, are easy to scan, can store a good amount of information, and can be used to link to text, digital business cards, multimedia, and social media channels.

- Influencers are people that have often amassed large followings via different types of media platforms and use their power of influence to communicate information. Influencers may be able to assist with conducting outreach activities by communicating to potential participants about available activities, programs and services. If a contracted personality is used, he/she should be provided with details/speaker's notes to effectively promote the federally-funded activities, programs and services. When considering whether to use an influencer for outreach, one should consider the Uniform Guidance's Cost Principles. Other things that might be considered are the influencer's reputation, follower base, any state or local vetting requirements, the receptivity of potential participants, the technology access of participants and the cost/benefit compared to a more traditional outreach modality. Influencer use is an outreach strategy that may be a powerful recruitment tool when assessed and used properly.
- Blog and Podcast Interviews: These platforms are usually interactive content that may be individually or serially posted and can discuss a federally-funded activity, program or service offering to a specifically targeted audience. They are typically short in length, and access to some podcasts may require a subscription service. The frequency of use, potential participant cost and availability of ongoing content should all be considered when undertaking this outreach modality.
- To reach people where they live, shop, and gather, particularly in more rural areas, the purchasing of a vehicle (Mobile AJC or workforce delivery vehicle) to conduct outreach as well as provide employment and training services may be considered. The Uniform Guidance considers motor vehicles as general-purpose equipment, which are allowable under the Cost Principles. Costs to repair and maintain the vehicle are also allowable. The costs of the vehicle and its maintenance must meet all the "factors of allowability" outlined in 2 CFR 200.403 of the WIOA, and in some circumstances, prior written approval from USDOL-ETA may be required. If the motor vehicle benefits two (2) or more programs, the cost of the mobile AJC and the costs to maintain the vehicle must be allocated to the other programs based on the relative benefit received (2 CFR 200.405(d)). Relationships need to be leveraged with other partners that serve the same community or partners and that may have the same purpose or mission when purchasing, staffing, and maintaining a mobile AJC unit.
- WIOA funds can be used to create materials in multiple languages or to procure translation and interpretation services. It is important when developing outreach strategies to make sure all potential participants, including those that speak languages other than English, are aware of services available. Access to vital information, which may include certain outreach materials, in a language the participant can understand is key to promote and ensure equity. Offering materials translated into the languages used in the community is a key effort to improve outreach and, indeed, may be required depending on the circumstances. Additionally, as a method to make information accessible to people that speak languages not frequently used in the community, consider expanding outreach efforts to individuals who have Limited English Proficiency (LEP) through use of a language access guide (called the "I Speak Card"). The "I Speak Card" is a language identification card/poster that will assist in identifying a preferred language for potential participants that speak a language other than English, so they can obtain the necessary assistance. Organizations can use such a card to pinpoint the appropriate speakers for anyone that requests services. Please visit the website <https://www.lep.gov/> for tips on addressing language barriers. Partnering with local communities that serve a diverse population can provide assistance with drafting culturally competent outreach materials in a variety of languages.
- Information about services must be made accessible to individuals with disabilities by providing auxiliary aids and services, including information in alternative formats. WIOA funds can be used to ensure outreach materials (including, for example, printed materials, forms, and presentations) are accessible. In addition, when developing, procuring, maintaining, or using electronic and

information technology with federal funds, including websites and electronically stored documents or information, access to and use of information and data for individuals with disabilities must be comparable to what is provided to individuals without disabilities. (www.Section508.gov) is a good resource. Document creation software like Microsoft Word has tools and accessible design templates that can help to create accessible content from the start. Moreover, when designing websites, accounting for accessibility at the outset is much easier than readjusting the site later to make it accessible for customers. Also, please note that specific accessibility standards apply to QR codes.

Outreach plan(s) should consider the examples provided in order to most effectively reach and best serve jobseekers and employers.

Any WIOA funds to be spent on outreach activities must have prior written approval from the NPWDB, Inc.

Procurement Restrictions: WIOA Title 1-B funds must be expended on only American-made equipment and programs as required by the Buy American Act. Sub-awards or contracts with parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in federal programs or activities are prohibited.

Disallowed Costs: All costs associated with an unallowable activity are considered disallowed costs, regardless of their permissibility under other circumstances. Examples of unallowable activities include, but are not limited to:

- Any legal expenses incurred for the prosecution of claims against the government are unallowable. This includes appeals to the Administrative Law Judge of disallowed costs or other claims and civil actions where the federal government is a defendant.
- The costs of construction or purchase of facilities or buildings or other capital expenditures for improvements to land or buildings, are unallowable for all WIOA Title 1-B programs, except with prior written approval from the U.S. Department of Labor.
- Public service employment, except when authorized under Title I of WIOA.
- Employment-generating activities, investment in revolving loan funds, capitalization of businesses, investment in contact bidding resource centers, economic development activities or similar activities (An exception is made only for those employer outreach and job development activities directly related to participants).
- The wages of incumbent workers during participation in economic development activities provided through the state workforce system.
- Foreign travel and first-class airline tickets.
- Employment or training programs for sectarian activities (This section does not prohibit the provision of services by faith-based organizations, unless those services are sectarian in nature).
- Expenses prohibited under any other federal, state, or local law or regulation.
- Costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are unallowable.

- Costs of promotional items and memorabilia, including models, gifts and souvenirs are unallowable.

Salary and Bonus Restrictions Using WIOA Funds: In instances where funds awarded under WIOA Title I or the Wagner-Peyser Act pay only a portion of the salary or bonus, the WIOA Title I or Wagner-Peyser Act funds may only be charged for the share of the employee's salary or bonus attributable to the work performed on the WIOA Title I or Wagner-Peyser Act grant. The restriction applies to the sum of salaries and bonuses charged as either direct costs or indirect costs under WIOA Title I and the Wagner-Peyser Act.

Contributions and Donations: Public funds cannot be used to sponsor third-party events (such as a Chamber of Commerce event). Sponsorship costs of contributions and donations

(including, but not limited to: cash, property, and services) from the non-federal entity to other entities, are unallowable. Furthermore, sponsoring events such as purchasing/sponsoring tables, paying to have entity's name placed on event material, or purchasing tickets to an event (considered entertainment) would be considered a donation. When making determinations on the number of staff to send to events/functions, as well as determining if the fees/costs associated with attendance are appropriate or allowable, management should abide by the necessary and reasonable standards as outlined in the 'Necessary' section of this policy.

Employment-Generating Activities: WIOA Title I funds must not be spent on employment-generating activities, investment in revolving loan funds, capitalization of businesses, investment in contract bidding resource centers, economic development activities, or similar activities, unless they are directly related to training for eligible individuals. For purposes of this prohibition, employer outreach and job development activities are directly related to training for eligible individuals. Employer outreach and job development activities may include, but are not limited to:

- Contacts with potential employers for the purpose of placement of WIOA participants;
- Participation in business associations (such as Chambers of Commerce), joint labor management committees, labor associations, and resource centers; or,
- WIOA staff participation on economic development boards and commissions, and work with economic development agencies to provide information about WIOA programs. (2 CFR 200.434(a) 9 20 CFR 683. 245).

Equipment: Equipment purchase is necessary, reasonable, and allocable. Equipment means tangible personal property (including information technology systems) having a useful life of more than one (1) year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the local area for financial statement purposes, or \$5,000. (2 C.F.R. § 200.1). For each equipment and computing device purchased with WIOA funds, the following information/data must be maintained:

1. Serial number or other identification number;
2. Source of funding for the property (including the FAIN);
3. Who holds title;
4. Acquisition date and cost of the property;
5. Percentage of federal participation in the project costs for the federal award under which the property was acquired;
6. Location, use, and condition of the property; and,
7. Any ultimate disposition data including the date of disposal and sale price of the property (2 C.F.R. 200.313(d)(1)).

The NPWDB, Inc. must take a physical inventory of equipment purchased with WIOA funds no less than once a program year. The results must be reconciled with property records at

least once every two (2) years. Equipment purchased must be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the federal funding award, and must not encumber the property without prior approval of the federal awarding agency and Workforce WV.

When no longer needed for the original program or project, the equipment may be used in other activities supported by the federal awarding agency, in the following order of priority:

1. Activities under a federal award from the federal awarding agency which funded the original program or project; then,
2. Activities under federal awards from other federal awarding agencies (2 C.F.R. § 200.313(c)(1)).

During the time equipment is used on the project or program for which it was acquired, the equipment will also be made available for use on other projects or programs currently or previously supported by the federal government, provided that such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by the federal awarding agency that financed the equipment. Second preference is given to programs or projects under federal awards from other federal awarding agencies. Use for non-federally funded programs or projects is also permissible. (2 C.F.R. § 200.313(c)(2))

When it is determined that original or replacement equipment acquired under a federal award is no longer needed for the original project or program or for other activities currently or previously supported by a federal awarding agency, the NPWDB, Inc. must contact the awarding agency for disposition instructions. Generally, disposition of equipment is dependent on its fair market value (FMV) at the time of disposition. If the item has a current FMV of \$5,000 or less, it may be retained, sold, or otherwise disposed of with no further obligation to the federal awarding agency. If the item has a current FMV of more than \$5,000, the federal awarding agency is entitled to the federal share of the current market value or sales proceeds. If acquiring replacement equipment, the local area may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property. (2 C.F.R. § 200.313(e)).

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 94

Date: October 16, 2023

Effective Date: October 16, 2023

Subject: Allowable Cost Policy – WIOA-Funded Programs & Services

This policy provides guidance on the proper use of WIOA funds to provide allowable training activities, programs and services to adults, dislocated workers and youth.

All expenditures under the Workforce Innovation and Opportunity Act (WIOA) must comply with the federal requirements associated with these funds. For WIOA Title I-B, this includes allowable activities identified in the WIOA statute and governing regulations, as well as the general requirements for managing federal grant funds that can be found in Uniform Grant Guidance. Local workforce development areas must adhere to the required uses of funds (Section 129 Use of Funds for Youth Workforce Investment Activities and Section 134 Use of Funds for Employment and Training Activities), the basic cost principles of the Uniform Guidance found in 2 C.F.R. Part 200, as well as the federal program regulations under Title 20 of the Code of Federal Regulations, when disbursing WIOA expenditures. In addition, local workforce development areas may not use more than ten (10) percent of the allocated award for administrative activities. (WIOA Section 128(b)(4)(A)).

WIOA funds may be used on permissible activities, including for low-wage workers and supportive services, but are not required to. Under WIOA Title I-B, funds to provide workforce investment activities must be directed at eligible Adults and Dislocated Workers. The One Stop Operator or partner must spend funds on Career Services and Training Services and may spend funds on permissible activities identified in the WIOA.

WIOA Title I funds may also be used to provide the additional services described below:

1. Job Seeker Services.

- a. Customer support to enable individuals with barriers to employment (including individuals with disabilities) and veterans to navigate among multiple services and activities.
- b. Training programs for displaced homemakers and for individuals training for non-traditional occupations (as defined in WIOA Section 3(37), occupations or fields of work in which individuals of one gender comprise less than twenty-five (25) percent of the individuals so employed), in conjunction with programs operated in the workforce area.
- c. Work support activities for low-wage workers, in coordination with local areas, that will provide opportunities for these workers to retain or enhance employment.
- d. Work support activities may include any activities available under the WIOA adult and dislocated worker programs in coordination with activities and resources available through partner

programs. These activities may be provided in a manner that enhances the worker's ability to participate, for example by providing activities during non-traditional hours or providing on-site childcare.

e. Support services, including needs-related payments, as described in WIOA Section 134(d)(2) and (3). Needs-related payments provide financial assistance to participants to enable them to participate in training. Unlike other support services, to qualify for needs-related payments, a participant must be enrolled in training.

2. Employer Services.

a. Customized screening and referral of qualified participants in training services to employers.

b. Customized employment-related services to employers, employer associations, or similar organizations on a fee-for-service basis that are, in addition to labor exchange services, available to employers under the Wagner-Peyser Act.

c. Activities to provide business services and strategies that meet the workforce investment needs of employers, as determined by the local area, and are consistent with the local area plan.

3. Coordination Activities.

a. Employment and training activities in coordination with any of the following:

i. Child support enforcement activities, as well as child support services. and assistance activities, of the state and local agencies carrying out part D of Title IV of the Social Security Act (42 U.S.C. § 651, et seq.);

ii. Cooperative extension programs carried out by the U.S. Department of Agriculture; and,

iii. Activities to facilitate remote access to services provided through a one-stop delivery system, including facilitating access through the use of technology.

b. Activities to improve coordination between workforce development and economic development and to promote entrepreneurial skills training and microenterprise services and improve services and links between the local workforce system and employers, including small employers.

c. Improving coordination between employment and training activities and programs carried out in the workforce area for individuals with disabilities.

4. Other Allowable Activities.

a. Technical assistance for one-stop operators, one-stop partners, and eligible providers of training services regarding the provision of services to individuals with disabilities in local workforce areas, including the development and training of staff, the provision of outreach, intake, assessments, and service delivery, the coordination of services across providers and programs, and the development of performance accountability measures.

b. Activities to adjust the economic self-sufficiency standards for local factors, or activities to adopt, calculate, or commission for approval, economic self-sufficiency standards for the local areas that specify the income needs of families, by family size, the number and ages of children in the family, and substate geographical considerations.

c. Implementation of promising services to workers and businesses, which may include support for education, training, skill upgrading, and statewide networking for employees to become workplace learning advisors and maintain proficiency in carrying out the activities associated with such advising.

Basic Cost Principles - In addition to the requirements in Local Uses of Funds outlined in Sections 129 and 134 of WIOA Title I-B, all expenditures of WIOA funds must meet the allowable cost principles outlined in 2 C.F.R. Part 200 Subpart E – Cost Principles. The cost principles of 2 C.F.R. Part 200 Subpart E are the basic guidelines describing allowable ways federal funds may be spent. Allowable costs are:

- i. Reasonable and necessary (meaning that, for example, sound business practices were followed, and purchases were comparable to market-prices) a. A cost may be reasonable if the nature of the goods or services acquired, and the amount involved reflect the action that a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made; and, b. A cost is necessary if it is required for the performance or administration of the grant and included in the budget;
- ii. Allocable to the federal award (meaning that the federal grant program, in this case WIOA, received a benefit in proportion to the funds charged to the program. For example, if fifty percent (50%) of an employee's salary is paid with WIOA funds, then the employee must spend at least fifty percent (50%) of his or her time on a WIOA program.)
- iii. Conforming to any limitations or exclusions set forth in these principles or in the federal award as to types or amount of cost items;
- iv. Consistent with policies and procedures that apply uniformly to both federally financed and other activities of the non-federal entity;
- v. Treated consistently as either a direct or indirect cost;
- vi. Legal under state and local law;
- vii. Properly documented and accounted for on a consistent basis with generally accepted accounting principles;
- viii. Consistent with the provisions of the grant program (WIOA Title I-B);
- ix. Not used for cost-sharing or matching any other grant agreement, except where otherwise authorized by statute (2 C.F.R. § 200.403); and,
- x. Incurred during the approved budget period.

Youth Workforce Investment Activities - Local areas must use WIOA funds to provide allowable youth workforce investment activities to eligible youth participants. Refer to Section 129(c)(1)-(2) for program elements and a full description of allowable youth workforce investment activities.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.

To: NPWDB Job Center Operator
NPWDB Training Providers
NPWDB Partnering Agencies

From: NPWDB, Inc.

Policy Number: 95

Date: November 15, 2023

Effective Date: November 15, 2023

Subject: Instructions for Handling & Protecting Personally Identifiable Information (PII)

Steps to handle and protect Personally Identifiable Information (PII) are as follows:

1. Identifying information collected about adult, dislocated worker, and youth workforce program participants is not considered a public record, must only be used for workforce program administrative purposes, and should not be disclosed to the general public or to unauthorized individuals. Identifying information includes, but is not limited to, names, home and email addresses, phone numbers, social security numbers, dates of birth, and other identifying information collected or maintained about individual job-seekers, those seeking education or training, and those seeking assistance in overcoming their barriers to employment.
2. Moreover, certain types of PII about workforce participants are more sensitive and confidential than others, because the disclosure of such information could result in financial or other harm to the individual whose name or identity is linked to that information. Such information requires a higher level of security and training of staff on the higher level of security required for this information — to prevent unauthorized access, use and disclosure. Examples of the types of PII that are more sensitive, and therefore subject to a higher level of security, include, but are not limited to, social security numbers, state and federal tax identification numbers, driver's license numbers, state identification numbers, credit and debit card numbers, bank and financial account numbers, student educational records (including transcripts, and information about current or prior enrollment, course progress, or graduation), medical history and information about an individual's current or prior physical or mental status, financial information, and information identifying the individual as an applicant for or recipient of unemployment compensation benefits, or food or cash assistance.
3. Any staff who work directly with job-seekers and other workforce program participants, or who handle or process PII about workforce participants, must take steps to ensure that PII is processed in a manner that will protect the confidentiality of the records/documents, and that PII is not accessed, viewed, or used by either the general public, or unauthorized staff/partner organizations.
4. Federal law, OMB Guidance, and United States Department of Labor (USDOL) policies require that PII and other sensitive information be protected. To ensure that PII and sensitive information is handled appropriately, The NPWDB, Inc. staff/subcontractors must:
 - a. Ensure PII is not transmitted to unauthorized users and all PII transmitted through e-mail or stored electronically (e.g., DVD or thumb drive) is encrypted.
 - b. Take necessary steps to ensure the privacy of all PII obtained from participants and/or other individuals and to protect such information from unauthorized disclosure.

c. Ensure that any PII used as part of the WIOA grant has been obtained in conformity with applicable Federal and state laws governing confidentiality of information. PII shall not be stored on personally owned equipment, at off-site locations (e.g., employee's home), and on personal e-mail accounts.

d. Ensure that all PII obtained through the WIOA grant is stored in an area that is physically safe from access by unauthorized persons at all times.

e. Store PII only on secure work servers and equipment that are approved by the local board. Storing PII on personally owned equipment, at off-site locations (e.g., employee's home), and on personal e-mail accounts is prohibited.

f. Advise all local area and/or provider staff who have access to sensitive/confidential/proprietary/private data of the confidential nature of the information, the safeguards required to protect the information, and the civil and criminal sanctions for noncompliance with such safeguards.

5. Implement policies and procedures regarding the handling of PII, including staff acknowledgement of their understanding of the confidential nature of the data and the safeguards with which they must comply in their handling of such data.

Below are requirements to protect PII:

1. Before obtaining a participant's SSN, the NPWDB, Inc. staff/subcontractors should make the participant aware of the use of their social security number for eligibility determination and federal grant purposes only.

2. The NPWDB, Inc. staff/subcontractors should use unique identifiers (i.e., MACC ID #) for participant tracking instead of the SSN. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to an individual, such as using a truncated or masked SSN (e.g., last 4 digits only).

3. The NPWDB, Inc. staff/subcontractors using an electronic system in addition to the MACC management system for basic career services tracking or other registration processes must truncate or mask an individual's SSN in such systems.

4. The NPWDB, Inc. staff/subcontractors using paper applications containing SSNs must, at a minimum, mask the SSN on the paper application and store in a secure manner. Only one participant file can be in the staff's possession at a time, while the other files are stored in a locked cabinet or desk.

5. Documentation of SSNs (e.g., physical copy of social security card) shall not be obtained until such time WIOA eligibility is determined, the individual receives a WIOA adult, dislocated worker, or WIOA youth program service that triggers participation in the program, and the individual becomes a participant.

6. When an individual becomes a participant, the NPWDB, Inc. staff/subcontractors must attempt to obtain and verify the SSN for performance reporting purposes but shall not deny access to the American Job Center's resource room or to WIOA program services if the individual does not disclose his or her SSN. If the individual refuses to provide an SSN, the local area will assign a temporary alternative identifying number. The individual will use this number for identification during subsequent visits to the American Job Centers or for program-funded activity tracking.

8. The NPWDB, Inc. staff/subcontractors must use appropriate methods for destroying sensitive PII in paper files and securely deleting sensitive electronic PII.

9. The NPWDB, Inc. staff/subcontractors at the American Job Centers or other service delivery location shall not leave records containing PII open and unattended.

10. The NPWDB, Inc. staff/subcontractors shall store documents containing PII in locked cabinets when not in use.

11. Local workforce development board directors shall report within 24 hours any breach or suspected breach of PII by the area or its subrecipient to the assigned Federal Project Officer at the Department of Labor (DOL), and follow any instructions provided by DOL.

Should you have any questions about this policy, please contact the NPWDB, Inc. office.