

October 27, 2021 | 10:30 a.m.
Eric Dial & Randy Hayes, Co-Chairs

VIA: Microsoft Teams Meeting

[Click here to join the meeting](#)

+1 470-419-6063 United States, Atlanta

Conference ID: 355 821 286#

Welcome

Rollcall

Presentation

- *2021 State of the Region Breakfast* – Cheryl Mayerik, Atlanta Regional Commission

ARWDB Action Items

- Consent Agenda, Approve meeting minutes from May 26, 2021
- Confirm 2022 Meeting Dates as approved by the Executive Committee
- Approve the wage rate for Work Based Learning programs
- NextGen (Youth) Policy Updates
 - Requires Additional Assistance Policy NGPP 01-04
 - High Poverty Area Policy NGPP 02-03
 - Supportive Services Policy NGPP 03-04
 - Incentive Policy NGPP 04-02
 - Work Experience Policy NGPP 05-02

ARWDB Reports & Discussion

- One Stop Manager's Report
- Executive Committee
- NextGen Committee
- Business Services Committee
- Director's Report

NEXT MEETING: December 15, 2021

Location: TBD

ARC COMMITTEE MEETING FOLLOW-UP

ATLANTA REGIONAL WORKFORCE DEVELOPMENT BOARD

May 26, 2021 Meeting Notes

Members Present

Ms. Sonia Carruthers
Ms. Mandy Chapman
Mr. Robert Duffield
Ms. Margie Ensley
Mr. Adam Forrand
Mr. Randy Hayes
Mr. Joseph Henning
Ms. Lee Hunter

Mr. James Jackson
Mr. Lindsay Martin
Mr. Chuck Little
Ms. Angelia O'Neal
Mr. Trey Ragsdale
Ms. Stephanie Rooks
Mr. Stephen Schultheis
Mr. Brandon Worthey

Members Absent

Mayor Eric Dial
Mr. Kent Mason

Mr. Aundra Walthall
Mr. Steven Wilson

Quorum met: 16 of 20 (Majority Required)

Guests

Mr. Mike Alexander, Atlanta Regional Commission -
Mr. Julian Allen, Atlanta Regional Commission – WorkSource Atlanta Regional
Ms. Deborah Battle, Atlanta Regional Commission – WorkSource Atlanta Regional
Ms. Brenda Beverly, Manager, Career Resource Center - Gwinnett Tech
Ms. Liz Campbell, Director of Chapter Development – Atlanta Electrical Contractors Association
Mr. Henry Charlot, Atlanta Regional Commission – WorkSource Atlanta Regional
Ms. Carlethia Collier, One-Stop Operator - Equus Works
Mr. Richard Coore, Atlanta Regional Commission – WorkSource Atlanta Regional
Ms. Lisa Davis, Atlanta Regional Commission – WorkSource Atlanta Regional
Ms. Christine Grigsby, Equus Works
Ms. Lynn Hamilton, Equus Works
Mr. John Hammond, Atlanta Regional Commission – Center for Community Services
Dr. Moshe Haspel, Director of Research – Emory University
Mr. John Helton, Executive Director - Atlanta CareerRise
Ms. Dorothy Herzberg, Manager, Career Resource Center – Clayton
Ms. Phyllis Jackson, Atlanta Regional Commission – WorkSource Atlanta Regional
Mr. Lucius McRunnels, Atlanta Regional Commission – WorkSource Atlanta Regional
Mr. Rob LeBeau, Atlanta Regional Commission – WorkSource Atlanta Regional
Ms. Erica Lewis, Atlanta Regional Commission – Center for Community Services
Ms. Marsharee O'Connor, Atlanta Regional Commission – WorkSource Atlanta Regional
Ms. Aixa Pascual, Atlanta Regional Commission – Center for Strategic Relations

Dr. Michael Rich, Professor of Political Science – Emory University
Ms. Elizabeth Sanford, Atlanta Regional Commission – Center for Community Services
Ms. Thania Saintil, Atlanta Regional Commission – WorkSource Atlanta Regional
Mr. Richard Sylvia, Director – Cloud Technology Partners
Ms. Suzette Tuitt, Atlanta Regional Commission – WorkSource Atlanta Regional

ARWDB Board Co-Chair, Randy Hayes, called the Board Meeting to order at 10:31 a.m.

There were no requests for public comment.

1. Robert Duffield made the following motion:

MOTION: To approve the minutes of the March 24, 2021 ARWDB meeting.

The motion was seconded by Stephen Schultheis and unanimously approved.

2. Trey Ragsdale made the following motion:

MOTION: To approve the certification of the three (3) Affiliate Site Locations (Cherokee, Douglas, and Rockdale).

The motion was seconded by Robert Duffield and unanimously approved.

3. Robert Duffield made the following motion:

MOTION: To approve WorkSource Atlanta Regional Financial (and other) Policies/Procedures Manual and Authorize staff to edit according the state and federal guidelines.

The motion was seconded by Stephanie Rooks and unanimously approved.

4. The ARWDB Executive Committee made the following motion:

MOTION: To approve the PY2021 WorkSource Atlanta Regional Budget.

The motion was second by Eric Dial and unanimously approved (Sonia Carruthers, Trey Ragsdale and Stephanie Rooks abstained due to conflict of interest).

The meeting was adjourned at 12:07 p.m.

NEXT ARWDB MEETING: August 25, 2021 Meeting to be Scheduled via Microsoft Teams (as of 5/26/2021)

“The World Health Organization has declared a pandemic due to the swift and worldwide spread of COVID-19. The Governor of the State of Georgia has declared a Public Health State of Emergency, which has been extended



through June 30, 2021, at least. Additionally, the Governor has extended the shelter in place for more at-risk Georgians for the duration of the current Public Health State of Emergency. This may preclude some members of the ARWD Board, and a large swath of the metro Atlanta population from attending an in-person Board meeting. The Georgia Open Meetings Act provides, "Under circumstances necessitated by emergency conditions involving public safety ... [we] may meet by means of teleconference ..." The public is afforded simultaneous access to this videoconference and teleconference meeting. Notice of the link and call-in number have been posted on our website, and at our office. Due to the extenuating circumstances and our limited action items, we are suspending our ARC "Policy for Citizen Input." We encourage interactions through our other channels including our social media pages and will be revisiting how to open public comment for any future teleconference meetings."

2-Day Summary





ARWDB 2022 Meeting Schedule

*All meetings are open to the public and are held at the Atlanta Regional Commission,
229 Peachtree St., NE, Suite 100, Atlanta, GA 30303
unless otherwise noted*

ATLANTA REGIONAL WORKFORCE DEVELOPMENT BOARD		
Date	Time	Meeting
March 23, 2022 (TBD)	9:30 - 10:30 a.m. 11:00 – 1:00 p.m.	Executive Committee Board Meeting and Annual Recognition Luncheon
May 25, 2022 (Microsoft Teams/ARC)	9:30 - 10:30 a.m. 10:30 – 12:30 p.m.	Executive Committee Workforce Board Meeting
August 24, 2022 (Microsoft Teams/ARC)	9:30 - 10:30 a.m. 10:30 – 12:30 p.m.	Executive Committee Workforce Board Meeting
October 26, 2022 (Microsoft Teams/ARC)	9:30 - 10:30 a.m. 10:30 – 12:30 p.m.	Executive Committee Workforce Board Meeting
December 7, 2022 (Microsoft Teams/ARC)	9:30 - 10:30 a.m. 11:30 – 1:30 pm	Executive Committee Workforce Board Meeting

DATE: October 15, 2021

TO: Atlanta Regional Workforce Development Board

FROM: Rob LeBeau, Director - ARWDB

CC: Henry Charlot, Business Services Manager

SUBJECT: PROPOSED ACTION – Approval of the Living Wage Policy Update

Requested Action (What)

To approve changes to the minimum wage for Work Based Learning programs. The rate currently stands at \$13.63 per hour. An increase to \$15.00 per hour is recommended.

Reason (Why)

WIOA incentivizes employers to meet their workforce needs and offer opportunities for workers to learn with increased reimbursement rates for on-the-job and other work-based training programs. In addition, Georgia targets in-demand occupations that pay an above-average entry-level wage, which are considered strong options for pursuing a successful career. As such, local workforce boards are empowered to determine which jobs and training programs it will support financially. Mandating a living wage supports overall Federal, State, and local workforce and economic development goals and objectives. The ARWDB has reviewed and adjusted its Living Wage Policy annually since 2016. The MIT Living Wage Calculator is used as the basis for adjustment. The MIT Living Wage Calculator establishes a rate that is determined to be the amount that an individual working full time would need to support themselves. The MIT rate for metro Atlanta currently stands at \$16.56. Since 2021 MIT Living Wage rate is significantly higher than the current rate (\$13.63), the recommendation is to make an incremental increase to \$15.00 and reassess the rate in 2022.

Timeframe (When)

The policy, if adopted, will go into effect immediately for any new work-based learning contracts written thereafter and remain in effect until the policy is next updated.

Impact (Who and How Much)

Both the companies who use our Work Based Learning programs and the trainees that are hired are impacted. The policy supports a living wage, and strategically targets jobs that pay at least this much. Though companies are required to pay a minimum amount to participate, it is noted that the market rate is typically higher than our required minimum for most occupations.

Recommendation

The Business Services Committee met on October 4, 2021, to consider adjusting the Work Based Learning program rate. The Business Services Manager raised a concern that in the current COVID and economic operating environment, such a large increase (to the MIT Living Wage rate of \$16.56) might limit participation in work-based learning programs. This is particularly true for small businesses, which make up a large part of our current client base. From recent hiring events, it has been noted that \$15 to \$17 is the rate at which companies have been able to fill open positions. Companies paying less have not been successful in hiring in the current environment. Given the current operating environment as detailed above, the Business Services team recommended an increase in the minimum wage from the current \$13.63 to \$15.00 per hour. While less than the MIT rate, it is still below the currently observed market rate for jobs in high demand industries.

In considering the recommendation, the Business Services Committee wanted to ensure that there was a rationale and justification for departing from the usual basis for adjustment (the MIT rate), so that the decision was not subjective. Committee discussion points included current concerns about inflation possibly being reflected in the MIT rate, uncertainty about changes that would occur as the labor market adjusts to the COVID economy over the next year, and the observed starting rates for apprenticeship and other technical professions. In considering all of the above factors, the Business Services Committee voted in favor of adjusting the rate to \$15 per hour, as an interim step over the next year, with the intent to raise it to the MIT rate over time.

DATE: October 27, 2021

TO: Atlanta Regional Workforce Development Board

FROM: Rob LeBeau, Director - ARWDB

SUBJECT: PROPOSED ACTION – Approval of the NextGen Program Require Additional Assistance Policy (NGPP 01-04)

Requested Action (What)

To approve the revised Requires Additional Assistance Policy (NGPP 01-04).

Reason (Why)

The purpose of this revised policy is to:

- Delete and add new eligibility provisions for youth to enroll in the WIOA program under the required additional assistance eligibility barrier.
- Further define documentation requirements for use of the required additional assistance barrier.
- Add and delete definitions used throughout the policy.
- Include the Action Required steps once the policy is approved by the ARWDB.
- Update to the latest local, state, and federal references.

Timeframe (When)

Upon approval by the ARWDB, the policy would become effective immediately for distribution to and use by the NextGen Program staff and Service Providers.

Impact (Who and How Much)

WIOA regulates a 5% limitation (number of in-school-youth) and a 5% Exception (over income) for youth who meet the requires additional assistance eligibility requirements. As a result, this policy impacts the percent of participants who use requires additional assistance as an eligibility barrier to enroll in the WIOA youth program.

Recommendation

This action comes as a recommendation from the NextGen Committee (NGC).



NextGen Program
Connecting Talent with Opportunity
A proud partner of the American Job Center network

REQUIRES ADDITIONAL ASSISTANCE

POLICY: NGPP 01-04

ARWDB Approved: _____

DATE: ~~October 25, 2019~~ August 2021 (Revised)
TO: ARC/ARWDB Staff & NextGen Service Providers
FROM: Marsharee O'Connor, NextGen Program Director
SUBJECT: Guidance & Guidelines for Serving Youth Who Requires Additional Assistance

1 – CONTENTS

This section outlines the number and title associated with each section throughout the document.

- | | |
|--|---|
| 2. Purpose | 8. Independent, Non-Independent, or Emancipated |
| 3. Policy | 9. Definitions |
| 4. Required Eligibility (Barrier) Provisions | 10. Attachments |
| 5. Required Additional Assistance (Barrier) Provisions | 11. Action Required |
| 6. Five Percent (5%) Limitation | 12. Inquires |
| 7. Five Percent (5%) Exception | 13. Policy Effective Date |

2 – PURPOSE

To establish a policy providing guidance and guidelines in the provision of Title 1-B, WIOA sec. 129, Use of funds for Youth Activities; 20 CFR § 681.300 and 20 CFR § 681.310(b) for serving youth who Requires Additional Assistance (RAA) (includes provision for ISY). The policy serves to establish a process for conducting WIOA low income and barrier to employment and/or education eligibility certification.

3 – POLICY

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 680.210; § 681.220; § 681.300; and § 681.310(b)
State Workforce (TCSG) – Policies and Procedures Manual 02/18/21)
TEGL No. – 08-15, 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(3)(B)

This policy is meant to clarify and expand certain definitions related to the RAA criteria used to determine WIOA Youth eligibility. These criteria are meant to meet the intent of the WIOA law and regulations and to expand definitional elements that will allow more youth to be WIOA eligible consistent with community needs.

4 – REQUIRED ELIGIBILITY (BARRIER) PROVISIONS

The RAA barrier is included in the following specified barriers required for WIOA eligibility.

OSY Eligibility Barriers – WIOA 3 (46) and 129 (a) (1) (B)

MUST MEET all three (3) requirements:

1. Not younger than 16 and not older than 24 years;
2. Not attending school (as defined by State law as a public, private or home study program that meets requirements under O.C.G.A §20-2-690). Youth enrolled in an adult education program provided under Title II of WIOA, YouthBuild programs, and Job Corps programs are considered OSY.; and
3. One or more of the following:
 - A school dropout, as defined by the state (a youth attending an alternative school at the time of enrollment is not a considered a dropout);
 - Within the age of compulsory school attendance (ages 6–18), but has not attended school for at least the most recent complete school year’s calendar quarter;
 - A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either:
 - a) Basic skills deficient; or
 - b) An English language learner;
 - 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 (42 U.S.C. 1403 e-2(6))), a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434A(2)));
 - A runaway;

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 680.210; § 681.220; § 681.300; and § 681.310(b)
State Workforce (TCSG) – Policies and Procedures Manual 02/18/21
TEGL No. – 08-15, 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(3)(B)

- In foster care or has aged out of the foster care system, a child eligible for assistance under §477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
- Pregnant or parenting;
- Disabled; or
- A low-income individual who requires additional assistance to complete an educational program or to secure or hold employment.

ISY – WIOA 3 (27) and 129 (a) (1) (C)

ELIGIBILITY BARRIERS

MUST MEET all four (4) requirements:

1. Not younger than 14 and not older than 21 years;
2. Attending school (as defined by State law);
3. Low-income, as defined by WIOA §3(36), or lives in a high poverty area; and
4. One 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 (42 U.S.C. 1403 e-2(6))), a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434A(2)));
 - A runaway;
 - In foster care or has aged out of the foster care system, a child eligible for assistance under §477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
 - Pregnant or parenting;
 - Disabled; or
 - Requires additional assistance to complete an educational program or to secure or hold employment.

5 – REQUIRES ADDITIONAL ASSISTANCE (BARRIER) PROVISIONS

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REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 680.210; § 681.220; § 681.300; and § 681.310(b)
State Workforce (TCSG) – Policies and Procedures Manual 02/18/21
TEGL No. – 08-15, 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(3)(B)

Equal Opportunity Employer/Program

The local Workforce Area is authorized to further define eligibility for youth services under the provision of the RAA. Per this provision, the ARWDB defines an individual who requires additional assistance to complete an educational program, or to secure and hold employment, as meeting one of the following:

- ~~A. Unemployed for the last six months or left/terminated from employment at least three times over the last year of WIOA NextGen Application; or have been unable to obtain employment in the last 90 days since separation from employer.~~
- ~~B. Currently employed less than full time (per State Law) and is seeking full time employment.~~
- ~~C. Have repeated at least one secondary grade level or grade level or more behind in secondary school credits due to failing classes or absence from school.~~
- ~~D. Requests assistance in navigating the application or financial assistance process in beginning or completing secondary or post-secondary education. For example, but not limited to: requests assistance in paying for or identifying credit recovery opportunities, in navigating the application process of a technical school or identifying assistance to afford technical school.~~
- ~~E. Is currently attending or requests assistance to enroll in public or private alternative education institutions which are designed to serve community youth who are deemed at risk, are not allowed in mainstream institutions, or who have been determined by the community as needing special attention.~~

Educational Barriers

1. In School (secondary or postsecondary) with a Grade Point Average of less than 2.0.
2. Has quit secondary or postsecondary program without attaining a recognized credential.
3. Has repeated at least one secondary grade level.
4. One or more years behind modal grade for one's age group, with particular emphasis on those two or more years behind modal grade.

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 680.210; § 681.220; § 681.300; and § 681.310(b)
State Workforce (TCSG) – Policies and Procedures Manual 02/18/21
TEGL No. – 08-15, 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(3)(B)

5. Placed on probation, suspended from school, or expelled from school one or more times during the past two years.
6. Documented behavioral problems at school.
7. Deemed at risk of dropping out of school by a school official.
8. Has received court agency referrals mandating school attendance.
9. For each year of secondary education, the individual is at least two semester credits behind the rate required to graduate from high school.

Employment Barriers

1. Has never held a job.
2. Has been fired from a job within the 12 months prior to program application.
3. Has never held a full-time job for more than 13 consecutive weeks.
4. Has a family history of chronic unemployment, including long-term public assistance.
5. Has been unemployed six months out of the last two years.
6. Is a high school graduate who has not held a full-time regular job for more than three consecutive months

Living Arrangements

1. Resides in a non-traditional household setting (i.e., single parent, lives with unofficial guardian, latchkey, grandparents, domestic partners, etc.)
2. Lives in public housing.
3. Lives in a federally-designated high poverty area as defined in the NGPP High Poverty Area Policy.

Medical/Family Barriers

1. Has a parent or legal guardian who is incarcerated.
2. Currently has substance abuse problem and/or a history of having substance abuse problem.
3. Has been referred to, or being treated by, an agency for substance abuse related problem(s).

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 680.210; § 681.220; § 681.300; and § 681.310(b)
State Workforce (TCSG) – Policies and Procedures Manual 02/18/21
TEGL No. – 08-15, 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(3)(B)

4. Has emotional, medical, physical, cognitive, or psychological impairment which creates a significant impediment to employment.
5. Has experienced recent traumatic events, is a victim of abuse, or resides in an abusive environment as documented by a school official or professional.
6. Faces significant personal challenges, including dysfunctional domestic situation, lack of supportive services, documented behavioral problems, and substance abuse by the youth or family members.

Characteristics

1. Children of incarcerated parents.
2. Emancipated youth.
3. Immigrant or refugee.
4. Migrant youth.

6 – FIVE PERCENT (5%) LIMITATION

No more than 5% of ISY who meet the RAA barrier may enroll in ARWDB NextGen Program.

- *The 5% enrollment will be calculated on a yearly basis (based on the Fiscal/Program Year – July 1st of one year to June 30th of the following year).*
- *NGSPs must receive prior approval from ARC (NextGen Program Director) to enroll youth in the Program.*

7 – FIVE PERCENT (5%) EXCEPTION

Up to 5% of OSY or ISY who meet the WIOA barrier eligibility requirements (including the RAA barrier), but family income exceed the low-income eligibility guidelines (over-income) may enroll in the ARWDB NextGen Program.

- *The 5% enrollment will be calculated on a yearly basis (based on the Fiscal/Program Year – July 1st of one year to June 30th of the following year).*

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 680.210; § 681.220; § 681.300; and § 681.310(b)
State Workforce (TCSG) – Policies and Procedures Manual 02/18/21
TEGL No. – 08-15, 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(3)(B)

- **NGSPs must ensure that income validation document(s) is provided, as self-attestation cannot be used as a qualifier for proof of income.**
- NGSPs must receive prior approval from ARC (NextGen Program Director) to enroll youth in the Program.

8 – INDEPENDENT, NON-DEPENDENT, OR EMANCIPATED

In addition to the other low-income criteria outline in the low-income guidance (see SDA Income Guideline) to determine eligible Low-income eligibility is often determined by the size of a youth's household/family. Therefore, an applicant who is determined to be an independent, non-dependent or an emancipated youth, who is a part of a household/family where the income exceeds the low-income guidelines, may enroll in ARWDB NextGen Program. The following definitional elements explain and expand what is meant by independent, non-dependent or emancipated youth.

- Within a household/family at some time during the last year (of WIOA NextGen Program Application date) the youth is/has been paying a reasonably significant part of their own way (for food, rent, etc.). There is no set minimum limit. Validation documentation must be provided by the head of the household/family attesting to the youth's living circumstance and explained in a note in the file by the NGSP.
- Has multiple or varying residences during a significant period of time over the last year, or away from the household/family in a special project or institutionalized for a significant period of time over the last year.
- Has demonstrated parental or soon-to-be parental, and/or husband/wife responsibilities even though in the living quarters of another household/family.
- A court adjudicated youth separated from family through an involuntary temporary residence elsewhere (e.g. institutionalized, incarcerated, placed as result of court order).
- A youth under 18 years of age who has petitioned the court to be legally declared an adult and competent to manage all their own affairs.

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REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 680.210; § 681.220; § 681.300; and § 681.310(b)
State Workforce (TCSG) – Policies and Procedures Manual 02/18/21
TEGL No. – 08-15, 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(3)(B)

Equal Opportunity Employer/Program

9 – DEFINITIONS

- **ARC** – Atlanta Regional Commission
- **ARWDB** – Atlanta Regional Workforce Development Board
- **CFR** – Code of Federal Regulations
- **ISY** – In-School Youth
- **NGP** – NextGen Program
- **NGPP** – NextGen Program Policy
- **NGSP** – NextGen Service Provider
- **OSY** – Out-of-School Youth
- **PY** – Program Year
- **RAA** – Requires Additional Assistance
- **Sec./ §** – Section
- **TCSG/OWD** – Technical College System of Georgia, Office of Workforce Development
- **TEGL** – Training and Employment Guidance Letter
- **WIG PS** – Workforce Implementation Guidance Programmatic Services
- **WIOA** – Workforce Innovation and Opportunity Act

10 – ATTACHMENTS

There is no attachment.

11 – ACTION REQUIRED

ARC/ARWDB NGP shall:

- Take the necessary action(s) to ensure compliance with this Policy.
- Ensure that the NGSPs are informed, trained and provided a copy of this Policy.

12 – INQUIRIES

Inquiries regarding this Policy and its guidance should be directed to an ARC/ARWDB NGP staff.

13 – POLICY EFFECTIVE DATE

This policy shall be effective upon the ARWDB approval date indicated on the first page of this document, and shall remain in effect until further notice.

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 680.210; § 681.220; § 681.300; and § 681.310(b)
State Workforce (TCSG) – Policies and Procedures Manual 02/18/21
TEGL No. – 08-15, 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(3)(B)

DATE: October 27, 2021

TO: Atlanta Regional Workforce Development Board

FROM: Rob LeBeau, Director - ARWDB

SUBJECT: PROPOSED ACTION – Approval of the NextGen Program High Poverty Area Policy (NGPP 02-03)

Requested Action (What)

To approve the revised High Poverty Area Policy (NGPP 02-03).

Reason (Why)

The purpose of this revised policy is to:

- Reduce the eligible community recruitment poverty percentage rate from 25% to 30% to align with State Policy.
- Remove the outdated Census Tract Geography data.
- Update the Search Tool used to locate high poverty areas.
- Include the documentation requirement to validate youth enrollment in the WIOA program using the high poverty area eligibility barrier.
- Add and delete definitions used throughout the policy.
- Update to the latest local, state, and federal references.

Timeframe (When)

Upon approval by the ARWDB, the policy would become effective immediately for distribution to and use by the NextGen Program staff and Service Providers.

Impact (Who and How Much)

The policy within itself does not have any financial impact; however, the policy provides an opportunity for those youth residing in the high poverty area census tract who are seeking to participate in the NextGen Program to be automatically considered low-income for WIOA eligibility.

Recommendation

This action comes as a recommendation from the NextGen Committee (NGC).



NextGen Program

Connecting Talent with Opportunity
A proud partner of the American Job Center network

HIGH POVERTY AREA

POLICY: NGPP 02-03

ARWDB Approved: ~~December 11, 2018~~

DATE: ~~November 26, 2018~~ August 2021 (Revised)
TO: ARC/ARWDB Staff & NextGen Service Providers
FROM: Marsharee O'Connor, NextGen Program Director
SUBJECT: Guidance & Guidelines for Serving Individuals in a High Poverty Area

1 – CONTENTS

This section outlines the number and title associated with each section throughout the document.

- | | |
|---|--------------------------------------|
| 2. Purpose | <u>6. Documentation of Residence</u> |
| 3. Policy | 7. Definitions |
| 4. Provisions | 8. Attachments |
| 5. Census Tract Geography | 9. Action Required |
| 6-5. <u>5.</u> Locate Address Correlated to the Census Tract | 10. Inquires |
| | 11. Policy Effective Date |

2 – PURPOSE

To establish a policy providing guidance and guidelines in the provision of Title 1-B, WIOA sec. 129, Use of funds for Youth Activities, 20 CFR § 681.260, youth living in a high poverty area. The policy serves to establish a process for conducting WIOA eligibility certification to determine low income of a youth living in a high poverty area.

3 – POLICY

WIOA 129 (a)(2), a youth living in a high-poverty area automatically meets the low-income barrier criterion for WIOA eligibility. 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 ~~25~~30% as determined every five (5) years using ACS five-year data." The ACS is the

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REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.260; and § 684.130
State Workforce (TCSG) – Policies and Procedures Manual ~~3.4.4 11/20/2017~~02/18/2021
TEGL No. – ~~23-1408-15, TEGL 08-1519-16 Attachment 2, and 21-16, and 23-14~~
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(2)

Equal Opportunity Employer/Program

source that collects and provides detailed data every five years about social, economic, demographic (population) and housing for communities across the United States.

4 – PROVISIONS

A youth who resides in an area defined as a “high poverty area” as indicated on the applicable census tract ~~listing provided by TCSG, OWD~~ shall automatically meet the low-income eligibility criteria under WIOA regardless of ~~their~~ household income. ~~Of the seven ARWDB workforce service area (counties) three counties (Clayton, Gwinnett, and Rockdale) have census tracts that meet the 25% or greater poverty rate.~~ Therefore, all youth residing in a “high poverty area” ~~these census tracts~~ who are seeking to participate in the WIOA youth program will automatically be considered low-income.

Expand Definitional Element

The following criteria are in addition to the WIOA requirement to define a residence in a “high poverty area” as outlined above. These provisions are meant to meet the intent of the WIOA law and regulations and to expand definitional elements that will allow more youth to be WIOA eligible consistent with community needs.

~~1.~~ 1. A youth living in:

- (a) Public Housing – Government owned housing provided for eligible low-income family; or
- (b) Subsidized Housing (Income Based-Housing) – Privately owned housing where the owner offers reduced rents to low-income tenants, or
- (c) Housing Choice Voucher (Section-8 Program) – Rent assistance provided to eligible low-income family.

❖ Must receive 100% housing voucher in rental assistance.

5 – CENSUS TRACT GEOGRAPHY

LOCAL AREA 7

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.260; and § 684.130
State Workforce (TCSG) – Policies and Procedures Manual 3.4.4 11/20/201702/18/2021
TEGL No. – 23-14, 08-15, TEGL 19-16 Attachment 2, and 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(2)

Atlanta Regional Workforce Development Board (ARWDB)

~~Census Tracts meeting "High Poverty" Definition—~~

~~(25% or more population below poverty level for the past 12 months (2009-2013 ACS))~~

Id	Geography	Pop	Pop Below poverty	Below Poverty %
1400000US13063040202	Census Tract 402.02, Clayton County	2595	934	36
1400000US13063040302	Census Tract 403.02, Clayton County	4709	1496	31.8
1400000US13063040303	Census Tract 403.03, Clayton County	7271	3047	41.9
1400000US13063040306	Census Tract 403.06, Clayton County	3852	1954	50.7
1400000US13063040308	Census Tract 403.08, Clayton County	4703	1949	41.4
1400000US13063040413	Census Tract 404.13, Clayton County	7637	2476	32.4
1400000US13063040415	Census Tract 404.15, Clayton County	5103	1736	34
1400000US13063040417	Census Tract 404.17, Clayton County	4285	1972	46
1400000US13063040516	Census Tract 405.16, Clayton County	6057	2386	39.4
1400000US13063040518	Census Tract 405.18, Clayton County	5208	1998	38.4

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.260; and § 684.130

State Workforce (TCSG) – Policies and Procedures Manual 3.4.4 11/20/201702/18/2021

TEGL No. – 23-14, 08-15, ~~TEGL 19-16 Attachment 2, and 21-16, and 23-14~~

Uniform Guidance – 2 CFR Part 200

WIGS PS – 15-002

WIOA Public Law Sec. – 113-128 and 129(a)(2)

1400000US13063040519	Census Tract 405.19, Clayton County	3840	1359	35.4
1400000US13063040520	Census Tract 405.20, Clayton County	3040	935	30.8
1400000US13063040526	Census Tract 405.26, Clayton County	5335	1673	31.4
1400000US13063040611	Census Tract 406.11, Clayton County	6534	2327	35.6
1400000US13063040612	Census Tract 406.12, Clayton County	5285	1813	34.3
1400000US13135050211	Census Tract 502.11, Gwinnett County	5087	1781	35
1400000US13135050304	Census Tract 503.04, Gwinnett County	5424	1760	32.4
1400000US13135050306	Census Tract 503.06, Gwinnett County	4768	1845	38.7
1400000US13135050319	Census Tract 503.19, Gwinnett County	5320	1647	31
1400000US13135050320	Census Tract 503.20, Gwinnett County	5304	2489	46.9
1400000US13135050417	Census Tract 504.17, Gwinnett County	5900	2369	40.2
1400000US13135050418	Census Tract 504.18, Gwinnett County	6694	2255	33.7
1400000US13135050422	Census Tract 504.22, Gwinnett County	8404	3106	37
1400000US13135050423	Census Tract 504.23, Gwinnett County	6836	2512	36.7

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.260; and § 684.130

State Workforce (TCSG) – Policies and Procedures Manual 3.4.4 11/20/201702/18/2021

TEGL No. – 23-14, 08-15, ~~TEGL 19-16 Attachment 2, and 21-16, and 23-14~~

Uniform Guidance – 2 CFR Part 200

WIGS PS – 15-002

WIOA Public Law Sec. – 113-128 and 129(a)(2)

1400000US13135050434	Census Tract 504.34, Gwinnett County	7812	2949	37.7
1400000US13135050539	Census Tract 505.39, Gwinnett County	4836	1657	34.3
1400000US13135050542	Census Tract 505.42, Gwinnett County	5023	1621	32.3
1400000US13247060201	Census Tract 602.01, Rockdale County	4291	1405	32.7

6-5 – LOCATE ADDRESS CORRELATED TO THE CENSUS TRACT

To determine if a youth's residence is located in a "high poverty area", visit ~~either one of the~~ following search tool ~~options~~:

Search Tool:

- Open website link:
https://www.google.com/maps/d/viewer?mid=1Xk_S91keHe9q6iZzuAeGwfMvtZBgxzBU&ll=33.88484528269274%2C-84.19066741611186&z=12
- Click the magnifying glass to search for an address.
- The "high poverty area" is indicated by the blue shaded areas on the map.

1. Option One:

- ~~Go to the FFIEC website:~~
<https://geomap.ffiec.gov/FFIECGeocMap/GeocodeMap1.aspx>
- ~~Enter the complete address indicated on the NextGen Program application and click "Search". In the details located in the left column, find the Tract Code. In the table above, under Geography, you will locate a correlating number. All of the Census Tracts on this table are within a "High Poverty Area".~~

2. Option Two:

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.260; and § 684.130
State Workforce (TCSG) – Policies and Procedures Manual 3.4.4 11/20/201702/18/2021
TEGL No. – 23-14, 08-15, TEGL 19-16 Attachment 2, and 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(2)

- ~~Go to the American Fact Finder website: www.FactFinder.Census.Gov.~~
- ~~Locate the “Address Search” section and click on the “Street Address” link.~~
- ~~Enter the complete address indicated on the NextGen Program application.~~
- ~~Under “Geography Results”, select Census Tract (seventh option on the list) and left click in the census tract hyperlink.~~

Disclaimer – The search tool utilized to verify census tract is often changing, refer to ARC staff to ensure that you are using the latest search tool. ~~or refer to TEGl 21-16 and follow the instructions for using “FactFinder.Census.Gov”.~~

6 – DOCUMENTATION OF RESIDENCE

The Career Advisor must print the document(s) to validate youth residence in a high poverty area and upload it to the WorkSource Georgia Portal (also known as VOS).

7 – DEFINITIONS

- | | |
|---|--|
| <ul style="list-style-type: none"> ▪ ACS – American Community Survey ▪ ARC – Atlanta Regional Commission ▪ ARWDB – Atlanta Regional Workforce Development Board ▪ FFIEC – Federal Financial Institutions Examination Council's ▪ <u>CFR – Code of Federal Regulations</u> ▪ NGP – NextGen Program ▪ NGPP – NextGen Program Policy ▪ NGSP – NextGen Service Provider ▪ PY – Program Year | <ul style="list-style-type: none"> ▪ Sec./ § – Section ▪ TCSG, OWD – Technical College System of Georgia, Office of Workforce Development ▪ TEGL – Training and Employment Guidance Letter ▪ <u>VOS – Virtual OneStop System (Workforce Georgia Portal)</u> ▪ WIG, PS – Workforce Implementation Guidance, Programmatic Services ▪ WIOA – Workforce Innovation and Opportunity Act |
|---|--|

8 – ATTACHMENTS

There is no attachment.

9 – ACTION REQUIRED

Page 6 of 7

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.260; and § 684.130
State Workforce (TCSG) – Policies and Procedures Manual 3.4.4 11/20/201702/18/2021
TEGL No. – 23-14, 08-15, TEGl 19-16 Attachment 2, and 21-16, and 23-14
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(2)

Equal Opportunity Employer/Program

ARC/ARWDB NGP shall:

- ~~ARC/ARWDB NGP will~~ take the necessary action(s) to ensure compliance with this Policy.
- ~~ARC/ARWDB NGP will~~ ensure that the NGSPs are informed, trained and provided a copy of this Policy.

10 – INQUIRIES

Inquiries regarding this Policy and its guidance should be directed to an ARC/ARWDB NGP staff.

11 – POLICY EFFECTIVE DATE

This policy shall be effective upon the ARWDB approval date indicated on the first page of this document, z and shall remain in effect until further notice.

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.260; and § 684.130
State Workforce (TCSG) – Policies and Procedures Manual ~~3.4.4~~ 11/20/2017 02/18/2021
TEGL No. – ~~23-14~~, 08-15, ~~TEGL 19-16 Attachment 2~~, and ~~21-16~~, and ~~23-14~~
Uniform Guidance – 2 CFR Part 200
WIGS PS – 15-002
WIOA Public Law Sec. – 113-128 and 129(a)(2)

DATE: October 27, 2021

TO: Atlanta Regional Workforce Development Board

FROM: Rob LeBeau, Director - ARWDB

SUBJECT: PROPOSED ACTION – Approval of the NextGen Program Supportive Service Policy (NGPP 03-04)

Requested Action (What)

To approve the revised Supportive Services Policy (NGPP 03-04).

Reason (Why)

The purpose of this revised policy is to:

- Adjust (decrease) the maximum amount of overall support services funding allowable to WIOA eligible youth participants from \$5,000 to \$3,000 due to limited youth funding.
- Adjust (increase) the maximum amount of supportive service in the form of transportation assistance (such as taxi's, private transportation firms, and company vehicle usage charges) allowable to WIOA eligible youth participants from \$50 to \$100 due to the cost for the services and the frequency in how the services are being used.
- Expand the supportive service guidelines to include support for technology access and equipment to WIOA eligible youth who are engaged in virtual learning.
- Add definitions used throughout the policy.
- Include the Action Required steps once the policy is approved by the ARWDB.
- Update to the latest local, state, and federal references.

Timeframe (When)

Upon approval by the ARWDB, the policy would become effective immediately for distribution to and use by the NextGen Program staff and Service Providers.

Impact (Who and How Much)

The policy will impact all WIOA participants that supportive services is available to based on need and funding availability. Each participant seeking supportive services will be required to complete a Determination of Need Request Form for approval after it has been determined no other resources are available.

Recommendation

This action comes as a recommendation from the NextGen Committee (NGC).



NextGen Program
Connecting Talent with Opportunity
A proud partner of the AmericanJobCenter network

SUPPORTIVE SERVICES

NextGen Program Policy: NGPP 03-~~0304~~

ARWDB Approved: August 29, 2019

DATE: August ~~6, 2019~~2021 (Revised)
TO: ARC/ARWDB Staff & NextGen Service Providers
FROM: Marsharee O'Connor, NextGen Program Director
SUBJECT: Guidance & Guidelines for Supportive Services Assistance

1 – CONTENTS

This section outlines the number and title associated with each section throughout the document.

- | | |
|---|-------------------------------------|
| 2. Purpose | 8. Allowable Supportive Services |
| 3. Policy | 9. Unallowable Supportive Services |
| 4. Provisions | 10. Concurrent Enrollment |
| 5. Twelve Months Follow-Up Period | 11. Definitions |
| 6. Eligibility and Determination of Need Assessment | 12. Attachments |
| 7. Documentation of Eligibility & Determination of Need | <u>13. Action Required</u> |
| | <u>13-14.</u> Inquiries |
| | <u>14-15.</u> Policy Effective Date |

2 – PURPOSE

To establish a policy providing guidance and guidelines in the provision of Title 1-B, WIOA sec. 129(c)(2), Youth Program 14 Element, 20 CFR § 681.570, Youth Supportive Services. The policy serves to establish a process for identifying need and providing supportive services assistance to participants receiving WIOA services. As defined in WIOA sec. 3(59), the available supportive services activities enable an individual to continue to have access to employment, education, and training opportunities to succeed in the labor market.

3 – POLICY

Supportive services are one of the 14 program elements options available under WIOA youth services. Supportive services may be made available to participants during enrollment in WIOA

Page 1 of 12

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

Title-I activities and/or after WIOA program exit (during the 12-months follow-up) period. To ensure coordination across programs, non-duplication of resources and services, and to establish limits on the amount and duration of services between Title-I programs, supportive services for the NGP must align with the Adult and Dislocated Workers Programs. **The total amount of Supportive Services MAY NOT exceed \$53,000 per participant, per program year unless approved by ARC prior to providing the assistance.**

❖ ***The supportive services cap of \$53,000 also INCLUDES the incentive cap of up to \$500 as outlined in the latest NGP Incentive Policy-04-01.***

Participants must first obtain supportive services through other programs before relying on WIOA Title-I funding. Career Advisors will assist participants to work with other programs to ensure they receive all the benefits to which they are entitled to under the law.

The ARWDB Director is authorized to adjust the maximum amount of support services funding allowable per person per year (not to exceed \$53,000) to ensure ARWDB programs and services are operated in the most effective manner possible. The ARWDB Director will review relevant data annually to determine if adjustments in the maximum cap should be adjusted. Future adjustments will become effective at the start of the program year unless extenuating circumstances arise to justify a change during the year. If warranted, mid-year adjustments will be recommended by the ARWDB Director and confirmed by the ARWDB Executive Committee

4 – PROVISIONS

Supportive services must be issued in accordance with the requirements contained in the Cost Principles in 2 CFR Part 200 (be reasonable and necessary, both in cost and in items being purchased), and be necessary for participation in career or training activities or the success of the Service Plan (ISS/ISP/IEP). Supportive services will only be provided when the individual is unable to obtain supportive services through another program that provides such services. To prevent duplication of resources and services, services available through other agencies will be researched, explored, and utilized prior to using WIOA funds. The Career Advisor will access services available in the community and make all efforts to access those services at no, or low cost to the participant.

Any assessments, tests and/or supportive services provided to the participant must be documented in the participant's Service Plan. Also, all supportive services must have been approved and recorded in WorkSource Georgia Portal (also known as VOS) prior to the participant receiving or obtaining the goods or services. Backdated requests for services WILL NOT be approved.

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021)

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

- ❖ The provisions of supportive services related to duration, time, and type outside of what is addressed in this policy will be considered on a case -by-case basis.

5 – TWELVE MONTHS FOLLOW-UP PERIOD

To ensure success after the program, supportive service may be provided to participants who exit the WIOA program and are in the 12- months follow-up period as defined in 20 CFR § 681.580. This is to ensure educational retention for those who are attending advance training (non-WIOA funded) or post-secondary school; and job retention, wage gains, and career progress for those who obtain unsubsidized employment. The approval process is the same as for participants in active status. Support service shall commence no earlier than participant's WIOA enrollment date and shall end upon completion of the 12-months follow-up period.

6 – ELIGIBILITY AND DETERMINATION OF NEED ASSESSMENT

ELIGIBILITY:

To be eligible for any WIOA financial assistance payments, participant must have been determined WIOA eligible and:

1. Be participating in career services and/or training services;
 - ❖ ***EXCEPTION – Limited supportive services (such as paying for copies of the social security card or birth certificate, etc.) may be provided to individuals who are not yet enrolled in WIOA. This type of supportive services enables the individuals to successfully participate in assessment activity as well as to complete the eligibility certification requirements for WIOA enrollment. Once enrolled in WIOA, the supportive services amount spent prior to WIOA enrollment will also count towards the \$53,000 cap indicated above.***
2. Be unable to obtain supportive services through other programs providing such services; and
3. Must comply with program regulations and policies during the period of training and/or enrollment to continue to receive supportive services payments.

DETERMINATION OF NEED:

1. **Financial/Physical Need** – There must be documentation in the participant's physical case file and ~~the WorkSource Portal/VOS~~ that demonstrates that the participant is incapable of providing these services for him/herself. Documentation may consist of:
 - a) Low-income status as documented by family/household income determination.
 - b) Receipt of federal or state public assistance.

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021)

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

- c) Receipt of UI benefits.
 - d) Documentation of skill upgrading that would lead to employment in a local or state in-demand occupation.
 - e) Documentation of lack of employment or underemployment.
 - f) Separation from employment notice.
 - g) Birth certificates of children receiving childcare.
 - h) Transportation distance to attend training.
2. **Resource Coordination** – There must be documentation that supportive services or funds for those services are not available from other state or federal grant programs. There must be analysis of all federal/state/local resources available and how they are being coordinated. For example, an ARC/ARWDB analysis of need form will document the total basis of need considering UI, Pell, Hope Grant/Scholarship etc., or other instances of federal/state/local resources available, to determine how resources are being coordinated. Examples of acceptable documentation:
- a) Participant time sheets or attendance record, to demonstrate active participation in WIOA activity/services (signed and dated by the participant and the instructor/supervisor providing training/WEx services).
 - b) Income Determination, to demonstrate the participant's is incapable of providing these services for him/herself
 - c) UI records, to demonstrate the income as well as if the funding were exhausted.
 - d) Application for applicable state and federal funds, to demonstrate that funding through those entities were denied or exhausted.
 - e) Supportive Services Request Form, to demonstrate the type of supportive services requested, justification of the requested amount, how the funds will assist the participant, and the time frame the supportive services will be provided (signed and dated by the participant and the Career Advisor).

EXCEPT for WEx related activities, a participant may waive WIOA supportive services assistance payment, if accepting payment would mean the loss of benefits. The following two provisions apply:

- The participant may request the assistance payment to start at a later date, but MAY NOT claim retroactive payments for those assistance.
- Advances against future assistance payments ARE NOT allowed.

Page 4 of 12

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021)

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

7 – DOCUMENTATION OF ELIGIBILITY & DETERMINATION OF NEED

Support Service Request Form: Each participant requesting supportive services must complete a “Supportive Services Request Form”. The Career Advisor will determine the basis of need and sign off on the justification for support that is necessary and reasonable to complete WIOA activities. For additional information regarding ~~the WorkSource Portal/VOS~~ documentation, see “ELIGIBILITY AND DETERMINATION OF NEED ASSESSMENT” section of this document.

- Justification – Must include the WIOA activity for which supportive services is being provided, a projection of the quarterly amounts as well as the total anticipated amount of supportive services requested. Also, the requested form must be collected and included in the participant’s physical case file as well as uploaded to ~~the WorkSource Portal/VOS~~.

All documentation of each supportive services payment type and amount must be entered in ~~WorkSource Portal/VOS~~ under the appropriate service activity code to include the type of support service, amount, date of service, etc. Supportive services data and document requirements for ~~the WorkSource Portal/VOS~~ are:

1. Documents to be uploaded – “Support Service Request Form” and any validation of proof of service.
2. Service Plan – Include goal(s) or objective(s) tied to the Supportive Services need as well as the plan of action to deliver said services.
3. Case-notes – All attempts to secure other funding as well as issuance of supportive services must be noted under the case-notes section.
4. Service Activity Code – The appropriate service activity code must be assigned. This section will be used to enter the payment type and amount of supportive services:
 - a) 480 Support Service – Child/Dependent Care.
 - b) 481 Support Service – Transportation Assistance.
 - c) 482 Support Service – Medical.
 - d) 483 Support Service – Temporary Shelter.
 - e) 485 Support Service – Other.
 - f) 486 Support Service – Counseling.

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021)

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WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

Career Advisors are responsible for tracking payments, to ensure compliance with the \$~~53~~,000 limitation. ARC/ARWDB Finance staff will also maintain records to monitor the yearly cap limitations. All supportive services information in ~~the WorkSource Portal~~/VOS must be updated and completed at the end of each fiscal quarter for all participants receiving supportive services in the fiscal quarter. ARC/ARWDB NGP staff will perform a secondary review and reconciliation of participants' information in ~~the WorkSource Portal~~/VOS to ensure the case management system and physical case files reflect an accurate account for the supportive services provided on a quarterly basis.

8 – ALLOWABLE SUPPORTIVE SERVICES

1. Linkages to Community Services

Assistance may be provided for participants needing linkages, referrals, and information about the availability of supportive services assistance not covered by WIOA. These services may include, but are not limited to: SNAP (Food stamps), TANF, veteran's assistance, financial assistance for education, and other public assistance funds.

2. Assistance with Transportation

Assistance (gas for personal vehicle, public transportation, etc.) may be approved for up to \$100.00 per month. Costs for other transportation services such as taxi's, private transportation firms, and company vehicle usage charges will be reimbursed at a maximum amount of \$~~50~~100.00 per month. Additional expenses may be approved by the ARC/ARWDB NGP Director for extenuating circumstances.

- For the WEx activity, mileage reimbursement may be available for participants who commute to and from a work site or training site for which no other form of transportation is reasonably available. Mileage reimbursement may be allowed up to the first 14 calendar days to support the participant's participation in WEx. Map mileage (calculated using an online map program) may be used as the basis for payment.
 - ***Supportive services expenditures provided during WEx, according to TEGL 21-16, (except for incentives – see NGP Incentive Policy 04-01) CANNOT be counted toward the WEx expenditure requirement even if supportive services assist the participant in participating in the WEx.***

3. Assistance with Child Care and Dependent Care

Child-care and dependent care assistance may be provided to participants who are not able to participate in WIOA programs without such assistance. This includes participants who are in danger of dropping out or making less than satisfactory progress due to unsatisfactory or

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021)

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

unreliable childcare/dependent care arrangements. Funds from other sources, such as DFCS or TANF, may be combined with WIOA funds with written approval by the ARC/ARWDB NGP Director. In those instances, WIOA funds may only be used for those expenses not covered by the other funding source. For participants receiving TANF benefits, NGSPS must document that the participant is not receiving dependent care benefits from TANF before providing dependent care assistance through WIOA.

- If dependent care is not otherwise available from DFCS, TANF or other funding sources, assistance may be available and NGP may reimburse the cost of:
 - Care for dependent children under age 6 or adult dependents with documented care needs, up to a maximum of \$70 per week per dependent (excluding late fees) while the participant is enrolled in basic career services or an ITA training service during times when the individual is scheduled and/or commuting to training activities.
 - Care for children ages 6 through 14 during times when school is not in session. For each dependent child ages 6 through 14, a maximum of \$45 per week per child may be provided to assist with after school care while a participant attends or commutes to scheduled training activities. A full-time rate of \$70 per week for each dependent child through age 14 may be provided during summer school break.
- Participants are encouraged to use licensed dependent care providers whenever possible. If not licensed, the service must be provided by a dependent care provider who cares for children outside of the participant's home.
- Dependent care costs will be paid directly to the dependent care provider if possible. However, under certain circumstances the cost may be reimbursed to the customer. Payments are based on receipts from the dependent care provider and include verification of a child's attendance record and verification of class attendance by the participant. Payments will be made monthly and will depend on timely receipt of the specified documentation.
- ARC/ARWDB will reimburse up to \$45 per child for a one-time registration fee if this fee is customarily charged by the dependent care provider to all clients. No reimbursements will be made for late fees incurred by participants.

4. Assistance with Educational Testing

Assistance is authorized for the payment of application fees to educational institutions. These are fees that are paid to determine a participant's eligibility and acceptance at the

Page 7 of 12

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021)

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

educational institution which will allow the participant to obtain information on financial aid awards. Assistance with books, fees, school supplies, and other necessary items for the students enrolled in post-secondary education classes are authorized as well.

- Tuition assistance will be reviewed for approval on a case-by-case basis by ARC/ARWDB NGP Director.

5. Reasonable Accommodations for Individuals with Disabilities

Assistance to enable an individual with a disability to gain access to participate in employment and training services.

- ❖ *It is **NOT** allowable to use WIOA supportive services funds to make capital improvements to a training facility or worksite for general compliance with the requirements of the Americans with Disabilities Act of 1990.*

6. Meals

For each day, a participant attends class for a minimum of 3 hours, \$6 may be provided to assist with meal expenses. Meal assistance is not available if provided by another agency such as DFCS.

7. Emergency Assistance

Defined as payments made on behalf of a WIOA participant to help with problems that would impact his/her continuation in and/or completion of a program. Emergency assistance can be provided for but not limited to, the following:

- Emergency car repairs.
- Emergency healthcare.
- Emergency utilities (power, heating fuel).
- Emergency housing.

Emergency Car Repairs – May be provided if the car is no longer safe, is the only means of transportation to and from training and is owned by the customer. The customer will be required to obtain three (3) written quotes for repairs, not exceeding 25% of the tax value of the vehicle or \$500, whichever is lower.

Emergency Healthcare – Assistance is authorized for healthcare and medical services. This assistance is not intended to cover the costs of major issues such as major surgery or major dental care, and is not intended to encourage visits to healthcare centers or doctors for minor illnesses for which the participant would not normally seek medical attention. Eye-glasses or protective eyewear may be provided if there are no other resources available to provide the

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021)

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

eyewear, and the customer's vision is impaired. Broken eyeglasses may be replaced if the customer cannot afford to replace them and cannot attend classes. Emergency healthcare must not exceed \$500.

Emergency Utilities – Payment is defined as one month's payment for electricity or heating fuel for a customer. Deposits are not allowable because the amount may be reimbursed to a participant later. Since this is a one-time emergency intervention, a plan must be established to ensure the participant will be able to meet long term utility needs. Emergency utility payments must not exceed \$500.

Emergency Housing – Assistance may be provided to participants on a case-by-case basis and require prior approval from ARC/ARWDB NGP Director. The assistance may include cost for rent and temporary housing. Past due rent is allowable. Deposits are not allowable because the amount may be reimbursed to a participant at a later date. Since this is a one-time emergency intervention, a plan must be established to ensure the participant will be able to meet long term housing needs. Assistance may not exceed \$1000 for one month or no more than \$1800 to include one month's back rent. Requests for the payment of rent requires the following supporting documentation:

- A rental or lease agreement bearing the participant's name, and
- An original statement signed by the landlord reflecting the amount of rent due and the corresponding dates.
- If a participant does not have a formal lease with a landlord, a notarized letter stating the name of the participant, the address of the property, and the amount of delinquency is required.

8. After Training Assistance

Allowable supportive services provided after training to obtain employment include, but are not limited to:

- Tools, uniforms, other work clothing, and boots/shoes required for employment (also includes eyeglasses and protective eye gear);
- Bonding and liability insurance for employment;
- Drug testing required by employer;
- Financial counseling; and
- Auxiliary aides and services necessary for persons with disabilities.

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021)

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

For participants enrolled in programs such as HVAC, automotive technology, and automotive collision, which require expensive tools for training as well as employment, supportive services may be used to supplement tool purchase costs during training in the event the participant's training ITA funds are exhausted by tuition, books, fees and other training costs.

- ❖ This determination will be made on a case-by-case basis by the ARC/ARWDB NGP Director.

9. Virtual Learning (Web-based Platform)

For those participants engaged in virtual learning, support may be provided. Support may include:

- Wi-Fi services.
- Computer (laptop or desktop).
- Software (Microsoft Office Suite). This must be a one-time cost and not a recurring cost.

NEEDS-RELATED PAYMENTS – Though needs-related payments as described in 20 CFR § 680.930 through § 680.970 WIOA, sec. 134(d)(3) and § 681.570 WIOA, sec. 129(c)(2) are an allowable supportive service authorized to provide financial support to participants (out-of-school and 18 – 24 years) for the purpose of enabling them to participate in training, ARC/ARWDB does not provide such support.

9 – UNALLOWABLE SUPPORTIVE SERVICES

Payments **ARE NOT** allowed for titled or deeded items or when recovery of the expense is anticipated. Unallowable supportive services include:

- Rent deposits or housing deposits;
- Mortgage payments;
- Car payments;
- Purchase of vehicles;
- Fines;
- Current or past taxes;
- Current or past child support;
- Legal fees (except fees for legal aid) such as bail and restitution; and

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~ 02/18/2021)

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

- Payment toward goods or services incurred or received prior to the participant's enrollment in WIOA.

10 – CONCURRENT ENROLLMENT

In accordance with 20 CFR § 680.430, NGP participants may concurrently co-enroll in NGP and the Adult Program and can receive supportive services from both programs' funding stream. However, supportive services cannot be duplicated, and the maximum \$53,000 program year limit includes cumulative funds awarded from both the NGP and Adult Programs.

11 – DEFINITIONS

- | | |
|--|--|
| <ul style="list-style-type: none"> ▪ ARC – Atlanta Regional Commission ▪ ARWDB – Atlanta Regional Workforce Development Board ▪ CFR - Code of Federal Regulations ▪ DFCS – Department of Family and Children Services ▪ HVAC – Heating, Ventilation and Air Conditioning ▪ ITA – Individual Training Account ▪ NGP – NextGen Program ▪ NGPP – NextGen Program Policy ▪ NGSP – NextGen Service Provider ▪ OJT – On-the-Job Training ▪ Sec./ § – Section | <ul style="list-style-type: none"> ▪ Service Plan (ISS/ISP/IEP) – Individual Service Strategy/ Individual Service Plan/ Individual Employment Plan ▪ SNAP – Supplemental Nutrition Assistance Program ▪ TANF – Temporary Assistance for Needy Families ▪ TEGL – Training and Employment Guidance Letter ▪ UI – Unemployment Insurance ▪ VOS –Virtual OneStop System (WorkSource Georgia Portal) ▪ WEx – Work Experience ▪ WIG PS – Workforce Implementation Guidance Programmatic Services ▪ WIOA – Workforce Innovation and Opportunity Act |
|--|--|

12 – ATTACHMENTS

The following document is included as an attachment to the Policy:

- [Supportive Services Request Form](#)

13 – ACTION REQUIRED

[ARC/ARWDB NGP shall:](#)

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~02/18/2021)

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

- Take the necessary action(s) to ensure compliance with this Policy.
- Ensure that the NGSPs are informed, trained and provided a copy of this Policy.

143 – INQUIRES

Inquiries regarding this Policy and its guidance should be directed to an ARC/ARWDB NGP
~~NextGen Program~~ staff.

154 – POLICY EFFECTIVE DATE

This policy shall be effective upon the ARWDB Approval date indicated on the first page of this document, and ~~will~~ shall remain in effect until further notice.

REFERENCES:

Federal Register (Final Rules & Regulation) 20 CFR – § 680.430; § 680.930; § 680.970; § 681.570; and § 681.580

NGPP – Incentive Policy ~~04-01~~

State Workforce (TCSG) – Policies and Procedures Manual ~~05/17/2019~~ 02/18/2021

TEGL No. – 8-15 and 21-16

Uniform Guidance – 2 CFR Part 200

WIOA Public Law Sec. – 3(59); 129(c)(2); and 134(d)(3)

DATE: October 27, 2021

TO: Atlanta Regional Workforce Development Board

FROM: Rob LeBeau, Director - ARWDB

SUBJECT: PROPOSED ACTION – Approval of the NextGen Program Incentive Policy (NGPP 04-02)

Requested Action (What)

To approve the revised Incentive Policy (NGPP 04-02).

Reason (Why)

The purpose of this revised policy is to:

- Adjust (decrease) the maximum amount of overall support services funding allowable to WIOA eligible youth participants from \$5,000 to \$3,000 due to limited youth funding as outline in the Incentive Policy. Incentive is a form of supportive services. As a result, any funding provided to eligible youth for incentives will count towards the overall \$3,000 cap for supportive services.
- Update the documentation requirement to validate youth eligibility to receive an incentive, the types of information to be documented about the incentive, and the service activity code used in the online case management system to validate that the incentive is being provided.
- Add and delete definitions used throughout the policy.
- Update to the latest local, state, and federal references.

Timeframe (When)

Upon approval by the ARWDB, the policy would become effective immediately for distribution to and use by the NextGen Program staff and Service Providers.

Impact (Who and How Much)

The policy will impact all WIOA participants that incentive is available to based on need and funding availability.

Recommendation

This action comes as a recommendation from the NextGen Committee (NGC).



NextGen Program

INCENTIVE POLICY (NGPP 04-021)

ARWDB Approved: February 8, 2018

DATE: ~~February 1, 2018~~ August 2021 (~~Established~~ Revised)
TO: ARC/ARWDB Staff & NextGen Service Providers
FROM: Marsharee O'Connor, NextGen Program Director
SUBJECT: **Guidance & Guidelines for Incentive Awards**

1 – CONTENTS

This section outlines the number and title associated with each section throughout the document.

- | | |
|---|-----------------------------------|
| 2. Purpose | 9. Unallowable Awards |
| 3. Policy | 10. Internal Control & Compliance |
| 4. Provisions | 11. Definitions |
| 5. Eligibility | 12. Attachments |
| 6. Documentation <u>of Eligibility & Service Delivery</u> | 13. Action Required |
| 7. Award Options | 14. Inquires |
| 8. Allowable Award Criteria | 15. Policy Effective Date |

2 – PURPOSE

To establish a policy providing guidance and guidelines in the provision of Title 1-B, WIOA sec. 129, Use of funds for Youth Activities, 20 CFR § 681.640, Youth Incentives. The policy serves to establish a process for awarding incentives to participants receiving WIOA services. Awarding of incentives acknowledges recognition and achievement of pre-determined milestones directly linked to education, training or WEx activity.

3 – POLICY

Incentives funded through WIOA must be connected to milestones achieved through a work-based learning (OJT, pre/apprenticeship, other WEx activities), education, or training activity that is reflected in the participant's individualized assessment and ISS/ISP/IEP. Achievement of

Page 1 of 7

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.640
NGPP – Supportive Services Policy ~~03-03~~
State Workforce (TCSG) – Policies and Procedures Manual ~~3.4.4 (11/20/2017)~~ 02/18/21
TEGL No. – 21-16
Uniform Guidance – 2 CFR Part 200
WIGS PS – 17-001
WIOA Public Law Sec. – 129

Equal Opportunity Employer/Program

milestones include improvements marked by testing, attainment of a credential, or other successful program outcomes. Participants may earn incentive awards up to \$500 per participant, per program year. Total incentives must not exceed the \$500 cap unless approved by ARC prior to issuance. Unlike supportive services, incentive awards for financial eligibility and determination of need DOES NOT need to be documented to provide incentive award to participants.

- ❖ The incentive award of up to \$500 will count towards the \$53,000 supportive services cap outlined in NGP Supportive Services Policy ~~03-02~~.

4 – PROVISIONS

Incentives may be made available to participants during enrollment in WIOA Title-I activities and/or after WIOA program exit (during the 12-months follow-up) period. The incentive awards must align with WIOA outcomes of remediation of basic skills, attainment of HSD/GED, gaining industry-recognized skills and credentials that will lead to in-demand, self-sustaining employment. Achievements obtained prior to WIOA enrollment do not qualify for incentives. Incentives are not intended for use as emergency assistance. See the NGP's "Supportive Services Policy" regarding emergency assistance.

5 – ELIGIBILITY

Participant must be active in the NGP or in 12-months follow-up activity. Incentives are awarded for recognition and achievement directly tied to training activities and work experiences provided it is made a part of the participant's ISS/ISP/IEP. Accordingly, the participant in collaboration with a Career Advisor, must develop an ISS/ISP/IEP delineating the training, employment and WEx goals. Awarding of incentives shall commence no earlier than participant's WIOA enrollment date and shall end upon completion of the 12-months follow-up period.

Incentives awards made to participants must comply with the following requirements:

- a) Tied to the goals of the specific program;
- b) Outlined in writing before the commencement of the program that may provide incentive awards;
- c) Aligned with the NGP and NGSP's organizational policies; and

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.640

NGPP – Supportive Services Policy ~~03-02~~03

State Workforce (TCSG) – Policies and Procedures Manual ~~3.4.4 (11/20/2017)~~02/18/21

TEGL No. – 21-16

Uniform Guidance – 2 CFR Part 200

WIGS PS – 17-001

WIOA Public Law Sec. – 129

- d) Issued in accordance with the requirements contained in the Cost Principles in 2 CFR Part 200 and 20 CFR § 681.640.

6 – DOCUMENTATION OF ELIGIBILITY & SERVICE DELIVERY

Incentive services data and document requirements for the WorkSource Georgia Portal (also known as VOS):

1. Documents to be uploaded – The Career Advisor must acquire verification documentation of attainment (copy of credential/test scores/grades, employer evaluations, attendance record, etc.) prior to issuance of the incentive award. The verification documentation must be uploaded to VOS.
2. Service Plan – Description of the achievement to qualify for specified incentive award must be documented in VOS under the Service Plan ISS/ISP/IEP.
3. Case-notes – Any other relevant information regarding progress, challenges, and successes.
4. Service Activity Code – The appropriate Incentives service activity code must be assigned:
 - 484 – Support Services – Incentives/Bonuses

~~The Career Advisor must acquire verification documentation of attainment (copy of credential/test scores/grades, employer evaluations, attendance record, etc.) prior to issuance of the incentive award. The verification documentation must be uploaded to GWROPP/VOS. Description of the achievement to qualify for specified incentive award must be documented in GWROPP/VOS under the ISS/ISP/IEP, case notes and Measurable Skills Gain sections. Also, the Incentive must be recorded in GWROPP/VOS to service Activity Code 484 (Support Services – Incentives/Bonuses).~~

7 – AWARD OPTIONS

Incentives may be awarded in the form of:

- Gift cards (not to exceed \$100 per card);
- Gas cards (not to exceed \$50 per card); and
- Gift certificates (not to exceed \$100 per certificate).

Cash incentives are **NOT** allowable.

Page 3 of 7

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.640

NGPP – Supportive Services Policy 03-0203

State Workforce (TCSG) – Policies and Procedures Manual 3.4.4 (11/20/2017)-02/18/21

TEGL No. – 21-16

Uniform Guidance – 2 CFR Part 200

WIGS PS – 17-001

WIOA Public Law Sec. – 129

8 – ALLOWABLE AWARD CRITERIA

There are two types of incentive expenditure classifications:

1. Career Services – Incentives awarded for participants in WEx, ~~GED~~ and follow-up services.
2. Training Services – Incentives awarded for participants in training (e.g. ITA or GED).

The following are some, but not all, recognized criteria for incentive awards:

- a) **Credential Attainment** – Attainment of a secondary school diploma or equivalent (HSD/GED), recognized post-secondary credential, or occupational industry-recognized credential obtained during participation in the NGP or during the 12-month follow-up period;
- b) **Measurable Skills Gain** – Attainment of a skill gain as defined by USDOL for program reporting (Federal Performance Measure):
 - Achievement of at least one educational functioning level, if receiving instruction below postsecondary education level;
 - Attainment of secondary school diploma or equivalent (HSD/GED);
 - Secondary or postsecondary transcript for sufficient number of credit hours
 1. Secondary – Transcript or report card for one semester, or
 2. Postsecondary – At least 12 hours per semester or, for part-time students, a total of at least 12 hours over two completed consecutive semesters.
 - Satisfactory progress report toward established skill-based milestone from an employer or training provider;
 - Passage of an exam required for an occupation or progress attaining technical/occupational skills as evidenced by trade-related benchmarks.
- c) **WEx** – Successful completion of WEx activities.
 - ❖ According to TEGL 21-16, incentives awarded for WEx MAY BE counted toward the WEx expenditures pending it is directly tied to the completion of WEx;

Page 4 of 7

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.640

NGPP – Supportive Services Policy 03-0203

State Workforce (TCSG) – Policies and Procedures Manual 3.4.4 (11/20/2017)-02/18/21

TEGL No. – 21-16

Uniform Guidance – 2 CFR Part 200

WIGS PS – 17-001

WIOA Public Law Sec. – 129

- d) **Placement in Education (post-secondary/Advanced Training) or Unsubsidized Employment (including Military)** – Attainment of full-time employment in the participant’s selected occupation/industry or placement in post-secondary or advanced education as reflected in the ISS/ISP/IEP.
- e) **Retention** – Employment retention in the same occupation/industry during the second and fourth quarters during the 12-months follow-up period.

❖ **Participants CANNOT receive multiple incentives for the same activity.**

9 – UNALLOWABLE AWARDS

According to TEGL 21-16, all incentive awards paid with WIOA funds must be in compliance with outlined Uniform Guidance (Cost Principles) under 2 CFR Part 200. The following are unallowable uses of WIOA funds for incentive awards:

1. Entertainment costs such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment;
2. Recruitment or referrals;
3. Rewards for submitting eligibility documentation or for completing the eligibility certification process;
4. Possession of a credential (diploma or certificate) attained prior to WIOA enrollment; and
5. Regular attendance or participation in the NGP where award is to sustain the participant’s ongoing attendance or participation.

Use of non-WIOA funds as incentives:

- TEGL 21-16 permits the leveraging of private funds for incentives that WIOA cannot fund. NGSP “must adhere to and maintain documentation in accordance to 2 CFR Part 200 Cost Principles and other related federal and state regulatory requirements when leveraging such funds, which are subject to federal and state monitoring review.”

10 – INTERNAL CONTROL & COMPLIANCE

NGSP must establish a clear and concise written policy that outlines the uniform and consistent procedures for awarding incentives. At a minimum the policy must include the following:

Page 5 of 7

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.640

NGPP – Supportive Services Policy 03-0203

State Workforce (TCSG) – Policies and Procedures Manual 3.4.4 (11/20/2017)-02/18/21

TEGL No. – 21-16

Uniform Guidance – 2 CFR Part 200

WIGS PS – 17-001

WIOA Public Law Sec. – 129

- a) The method and justification for the issuance of incentives. Also, the policy must provide the types of incentive awards being offered (i.e., what activity/service/program the participant is participating in and how success is measured), and the amount of the incentive awards for each activity/service/program successful outcome.
 - Incentives must be administered in a manner that ensures all participants receive equal awards for equal achievements.
- b) Method by which gift cards, gas cards and gift certificates for incentives are purchased.
- c) Method by which gift cards, gas cards and gift certificates for incentives are stored.
- d) Adequate systems of internal control to accurately and timely track (purchase and issuance) and report all incentive awards. The system for tracking must include signatory compliance, tracking document to include issuance date, etc. Also, a minimum of three individuals must sign off to indicate that an incentive has been awarded:
 1. Career Advisor – The individual who is accountable for case managing the participant.
 2. NGSP Director – The individual who is responsible for the program’s budget.
 3. Participant – The WIOA enrolled individual who is receiving the incentive award.
 - ❖ For letters “c” and “d” above, must ensure safeguard of items (gift cards, gas cards and gift certificates) purchased.
 - ❖ **If items are purchased in bulk, NSGPs will ONLY be reimbursed for the purchase cost of items issued to participants.**
- e) Assurances of compliance and alignment with NGP Incentive Policy.

11 – DEFINITIONS

- | | |
|---|---|
| <ul style="list-style-type: none"> ▪ ARC – Atlanta Regional Commission ▪ ARWDB – Atlanta Regional Workforce Development Board ▪ CFR - Code of Federal Regulations | <ul style="list-style-type: none"> ▪ GWROPP/VOS – Georgia Work Ready Online Participant Portal/ Virtual OneStop System ▪ HSD/GED – High School Diploma/ General Education Diploma |
|---|---|

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.640
NGPP – Supportive Services Policy 03-0203
State Workforce (TCSG) – Policies and Procedures Manual 3.4.4 (11/20/2017)-02/18/21
TEGL No. – 21-16
Uniform Guidance – 2 CFR Part 200
WIGS PS – 17-001
WIOA Public Law Sec. – 129

- **ISS/ISP/IEP** – Individual Service Strategy/ Individual Service Plan/ Individual Employment Plan
- **ITA** – Individual Training Account
- **NGP** – NextGen Program
- **NGPP** – NextGen Program Policy
- **NGSP** – NextGen Service Provider
- **OJT** – On-the-Job Training
- **Sec./ §** – Section
- **TCSG/OWD** – Technical College System of Georgia, Office of Workforce Development
- **TEGL** – Training and Employment Guidance Letter
- **USDOL** – United States Department of Labor
- **VOS** – Virtual OneStop System ([WorkSource Georgia Portal](#))
- **WEx** – Work Experience
- **WIG PS** – Workforce Implementation Guidance Programmatic Services
- **WIOA** – Workforce Innovation and Opportunity Act

12 – ATTACHMENTS

There is no attachment.

13 – ACTION REQUIRED

ARC/ARWDB NGP shall:

- Take the necessary action(s) to ensure compliance with this Policy.
- Ensure that the NGSPs are informed, trained and provided a copy of this Policy.

14 – INQUIRIES

Inquiries regarding this Policy and its guidance should be directed to an ARC/ARWDB NGP staff.

15 – POLICY EFFECTIVE DATE

This policy shall be effective upon the ARWDB approval date indicated on the first page of this document and shall remain in effect until further notice.

REFERENCES:

Federal CFR – (Final Rules & Regulation) 20 CFR – § 681.640

NGPP – Supportive Services Policy ~~03-0203~~

State Workforce (TCSG) – Policies and Procedures Manual ~~3.4.4 (11/20/2017)~~ 02/18/21

TEGL No. – 21-16

Uniform Guidance – 2 CFR Part 200

WIGS PS – 17-001

WIOA Public Law Sec. – 129

DATE: October 27, 2021

TO: Atlanta Regional Workforce Development Board

FROM: Rob LeBeau, Director - ARWDB

SUBJECT: PROPOSED ACTION – Approval of the NextGen Program Work Experience Policy (NGPP 05-02)

Requested Action (What)

To approve the revised Work Experience Policy (NGPP 05-02).

Reason (Why)

The purpose of this revised policy is to:

- Name change to one of the work experience activity/program/services to align with the service activity name outlined in the online case management system.
- Include additional service activity codes to be used in the online case management system to validate that an eligible youth is enrolled/participating in the work experience activities.
- Include statement regarding monitoring of worksite by local, federal, and state agencies.
- Add and delete definitions used throughout the policy.
- Include the Action Required steps once the policy is approved by the ARWDB.
- Update to the latest local, state, and federal references.

Timeframe (When)

Upon approval by the ARWDB, the policy would become effective immediately for distribution to and use by the NextGen Program staff and Service Providers.

Impact (Who and How Much)

WIOA requires that 20% of Youth Program funding be allocated to provide and perform WEx related activities/services. Through this requirement, the financial impact is based on “County Fair Share” funding allocation practice, where a fair share percentage is allocated to each respective county in the ARWDB service area. As a result, the funding amount allocated to provide WEx services varies among youth providers. Allowable WEx funding expenditures are participant wages, stipends as well as salary for staff working directly with WEx.

Recommendation

This action comes as a recommendation from the NextGen Committee (NGC).



NextGen Program
Connecting Talent with Opportunity
A proud partner of the American Job Center network

WORK EXPERIENCE (WEx)
NextGen Program Policy: NGPP 05-~~01~~02
ARWDB Approved: August 29, 2019

DATE: August ~~6, 2019-2021~~ (~~Established~~Revised)
TO: ARC/ARWDB Staff & NextGen Service Providers
FROM: Marsharee O'Connor, NextGen Program Director
SUBJECT: **Guidance & Guidelines for Operating and Providing Work Experience Services/Activities**

1 – CONTENTS

- | | |
|--|---|
| 2. Purpose | 13. Compensation |
| 3. Policy | 14. Supportive Services & Incentives |
| 4. Provisions | 15. WIOA Workplace Guidelines |
| 5. Work Experience Design | 16. Unallowable Placements |
| 6. Assessment Prior to Work Experience Placement | 17. Documentation of Eligibility & Service Delivery |
| 7. Types of Work Experience Activities | 18. Monitoring |
| 8. Worksite Eligibility | 19. Definitions |
| 9. Worksite Agreement | 20. Attachments |
| 10. Trainee Work Experience Agreement | <u>21. Action Required</u> |
| 11. Work Experience Expenditure Provisions | <u>21-22.</u> Inquiries |
| 12. Employer of Record | <u>22-23.</u> Policy Effective Date |

2 – POLICY

To establish a policy providing guidance and guidelines in the provision of Title 1-B, WIOA sec. 129(c)(2)(C) activities; Work Experience, 20 CFR § 681.540, § 681.550, and § 681.600. WIOA 129(c)(4) and 20 CFR § 681.590(a) requires that a minimum of 20 percent (20%) of local workforce area funds for Title IB Youth Program must be spent on WEx activities. The policy serves to

Page 1 of 13

REFERENCES:

State Workforce (TCSG) – Policies and Procedures Manual (~~08/08/2019~~)02/18/2021

WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)

Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270

Uniform Guidance – 2 CFR Part 200

TEGL No. – 8-15; 23-14; and 21-16

NGPP – Incentive Policy ~~04-01~~ and Supportive Services Policy ~~03-03~~

Equal Opportunity Employer/Program

establish a process for operating WEx and providing WEx opportunities to participants receiving WIOA services.

3 – POLICY

WEx is designed to provide exposure to the world of work for WIOA enrolled participants. 20 CFR § 681.600 requires that WEx must include an academic and occupational education component which:

- Is the contextual learning that accompanies a WEx;
- The academic may occur concurrently or sequentially with the occupational component;
- May occur inside or outside the worksite;
- Includes information needed to understand and work in specific industries or occupations; and
- Can be provided by the employer or may be provided separately in the classroom.

This integrated education and training model ensures the participants are provided workforce preparation activities, basic academic skills, and hands-on occupational skills training that are taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway.

4 – PROVISIONS

WEx must be a planned and structured learning experience that takes place in a workplace for a limited period of time with an academic and occupational education component. Participants must be provided with opportunities for career exploration, skill development, work ethics reinforcement, and workforce preparation activities to aid the participant in gaining marketable skills that lead to unsubsidized employment or entry into a registered apprenticeship program. WEx may take place in a private, public or non-profit sector. WEx is not intended to exclusively benefit the employer, participants placed in WEx are considered Trainees and employers should not depend on the Trainee's productivity to maintain or advance the employers' profits or performances.

WEx may be paid or unpaid and are beneficial for those participants who have sporadic employment history or limited marketable skills and are looking to upgrade their skills. WEx

REFERENCES:

State Workforce (TCSG) – Policies and Procedures Manual ~~(08/08/2019)~~ 02/18/2021

WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)

Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270

Uniform Guidance – 2 CFR Part 200

TEGL No. – 8-15; 23-14; and 21-16

NGPP – Incentive Policy ~~04-01~~ and *Supportive Services Policy* ~~03-03~~

provide the participant with an opportunity for work acculturation and basic occupational skills attainment.

WEx after WIOA Exit – Subsidized WEx is not available for participants who have exited (in Follow-up services) the NextGen Program.

5 – WORK EXPERIENCE DESIGN

NGSP must have a WEx program design that specifies the operational processes and tools required to effectively and efficiently operate WEP (including but not limited to program goals, length of WEx, assessment of participant's interest and aptitude, participant wage, monitoring of worksites and participants, etc.). NGSP must refer to their contract Goal Sheet each program year to ensure that the number of WEx participants to serve, the cost per participant, and the WEx allocated funds align with their WEx program design.

Length of WEx

The length of WEx must be limited to the length of time appropriate for career exploration and for developing good work habits. As a result, WEx placement should be no more than sixteen (16) weeks. However, depending on the complexity of the job tasks and the individual needs of the participants, there may be circumstances where WEx can be extended. An NGSP must receive prior approval from ARC prior to extending a participant's WEx beyond sixteen weeks.

❖ WEP activities should conclude by the end of each program year.

6 – ASSESSMENTS PRIOR TO WORK EXPERIENCE PLACEMENT

WEx must be appropriate based on the needs identified by an objective and comprehensive assessment as documented in the participant's Service Plan (ISS/ISP/IEP). WEx opportunities may be offered to participants after an assessment of the participants skills, interests, aptitudes, prior WEx, education, employability and career objectives have been conducted and its determined that the participant will benefit from participating in WEx. Once deemed appropriate for WEx, the WEx must be included in the participant's Service Plan.

7 – TYPES OF WORK EXPERIENCE ACTIVITIES

The types of paid and unpaid WEx activities available for participants include the following:

1. **Summer Employment and other employment opportunities available throughout the school year** – Summer employment placements that typically occurs after the last day of school for summer break and ends before school resumes for the following semester as well as year-round employment opportunities throughout the school year.

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REFERENCES:

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Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580; § 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270

Uniform Guidance – 2 CFR Part 200

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Equal Opportunity Employer/Program

2. **Pre-apprenticeship Programs** – A preparatory program that prepares participants who want to begin an apprenticeship for a certain industry and trade. It is *“designed to prepare individuals to enter and succeed in Registered Apprenticeship programs. These programs have a documented partnership with at least one Registered Apprenticeship program sponsor and together, they expand the participant’s career pathway opportunities with industry-based training coupled with classroom instruction.”* The pre-apprenticeship must be sponsored by one of the Registered Apprenticeship programs indicated on the Eligible Training Provider List (ETPL).
3. **Internships and Job-Shadowing** – These two activities take place in a workplace and both offer the participants exposure to employers and their working environments. They must be supervised, emphasize learning and professional development, and include an evaluative component for both the employer and the participant. Program differences are distinguished below:
 - A. Internship – A planned and structural learning experience that can be paid or unpaid, the activity **can last from one week up to sixteen (16) weeks** and must offer career related learning opportunities and experiences. It cannot be routine or repetitive tasks unrelated to identified learning goals.
 - B. Job-Shadowing – Enables the participant to walk through the work-day as a shadow (spend some time observing) to a competent worker to witness firsthand (learn) about the occupation, to understand the work environment and the skills needed for the occupation and potential career options. This **can last from one day up to one week**.
4. **On-the-Job Training (OJT)** – “Provides reimbursements to employers to help compensate for the costs associated with skills upgrade training and loss of production for newly hired employees. OJT can assist employers who are looking to expand their business and need additional staff trained with specialized skills. OJT employers may receive reimbursement of 50% or 75% of the wage rate of OJT trainees.” OJT benefits the employees (youth participants) by providing an opportunity to “earn while learn” in a hands-on environment, acquire job and career advancement skills, and provides an opportunity for long-term employment.
 - ❖ **All OJT opportunities must be approved and directed by ARC. OJT funds are reserved at ARC and are not allocated to an NGSP’s contracts.**

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REFERENCES:

State Workforce (TCSG) – Policies and Procedures Manual ~~(08/08/2019)~~ 02/18/2021

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Equal Opportunity Employer/Program

5. ~~Workforce Preparation~~Preemployment Training/Work Maturity – The activities, programs or services designed to help a participant acquire a combination of basic academic, critical thinking, self- management, and employability skills.

8 – WORKSITE ELIGIBILITY

In determining an employer's viability to become a worksite, an NGSP must:

1. Authenticate the employer's history with WEx contracts, history of layoffs, relocation, and labor disputes, as well as occupational and industry outlook.
2. Conduct a worksite pre-assessment to verify that the requirement of 20 CFR 683.260 is met.

9 – WORKSITE AGREEMENT

NGSP must complete a Worksite Agreement with each worksite that is utilized. The signed copy of the Worksite Agreement must be given to all parties to ensure that the expectations are fully understood.

- At a minimum, the Worksite Agreement should include the following elements
 1. Names and contact information for all parties;
 2. The names and titles of the Worksite Supervisors who are authorized to sign the timesheet for the WEx participant(s);
 3. The participant's WEx start and end date;
 4. Responsibilities and expectations of the participant, the worksite, and the NGSP;
 5. The job title, pay, duties, and goals for each WEx participant;
 6. A statement informing the worksite that they may be subjected to worksite monitoring by Federal and State representatives, NGP, as well as regular visitations by NGSP staff to check on the progress of the WEx participants;
 7. Other information relevant to the specific WEx activity; and
 8. Signatures and dates for all applicable parties.

10 – TRAINEE WORK EXPERIENCE AGREEMENT

If the participant is not a party to the Worksite Agreement, there must be an executed agreement with the participant to define expectations.

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REFERENCES:

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Equal Opportunity Employer/Program

- At a minimum, the Trainee Work Experience Agreement must address the following elements:
 1. Worksite, address, supervisor, and telephone number;
 2. Start and end date;
 3. Responsibilities and expectations of the participant, the worksite employer, and the NGSP;
 4. Job title, wage, duties, and goals; and
 5. Participant signature and date.
 - ❖ If the participant is under 18, the agreement must contain the signature of the participant's parent or legal guardian.

The scheduled number of hours per week may be modified by the worksite after work begins pending the written approval of the participant and the NGSP.

11 – WORK EXPERIENCE EXPENDITURE PROVISION

A minimum of sixty percent (60%) of the WEx funding must be allocated to participants' wages and a maximum of forty percent (40%) to staff who are directly working with WEP, as well as other related WEx costs. NGSP may elect to allocate more than 60% funding toward participant wages.

- The same WEx funding allocation requirements of 60/40% applies to all "Employer of Record" partnerships.
- NOTE: The 60/40% requirements do not apply to OJT, as those opportunities are paid with funds reserved by ARC.
- No certificate training costs will be allocated to the WEx budget.

Allowable expenditures may include items such as:

- Wages or stipends paid for participation in a WEx;
- Staff time working to identify and develop a WEx opportunity, including staff time spent working with employers to identify and develop WEx;
- Staff time working with employers to ensure a successful WEx, including staff time spent managing WEx;

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REFERENCES:

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Equal Opportunity Employer/Program

- Staff time spent evaluating WEx;
- Participant WEx orientation sessions;
- Employer worksite orientation sessions;
- Classroom training or the required academic education component directly related to WEx;
- Incentive payments directly tied to the completion of WEx; and
- Employability skills or job readiness training to prepare youth for a WEx.

WEx participants are not authorized to work overtime and shall not be compensated for overtime wages, sick leave, vacations, lunch breaks, or holidays recognized by the NGSP or employer as a “paid holiday”.

When determining the types of expenditures that are allowable to help meet this requirement, additional information can be found in TEGL 8-15 and TEGL 21-16.

12 – EMPLOYER OF RECORD

In order to provide paid WEx opportunities, NGSP must have the capacity to be an Employer of Record, whether directly provided or through partnership with an agency or an employer who will serve as the Employer of Record. The Employer of Record must adhere to all child labor laws regarding hours of employment, working conditions, etc. as required by Federal and State labor standards. The Employer of Record must have FICA taxes and Workers Compensation insurance. Worker compensation must be provided prior to and during WEx worksite placements.

- NGSP must have reasonably insurance coverage for any other work-based learning activities that requires the participant to be at a worksite (but is not working).

13 – COMPENSATION

Per Uniform Guidance 2 CFR Part 200, participants must be provided with a reasonable wage or stipend consistent with that paid for similar work.

Wages

Participants must be compensated according to Georgia minimum wage standards or as otherwise stated according to law, statutes and regulations, or are paid the prevailing wage of employees with similar training, experience, and skills for a similar occupation, as set by the

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employer. However, since WEx is intended as a trainee position, wages do not typically exceed those for entry level employees.

Stipend

A stipend is an allowable payment for participation in unpaid WEx or classroom activities, including work readiness or employability skills training. Stipend is a one-time payment that must not exceed \$250.00 per qualifying WEx activity. Stipend must be issued through a uniformed payment system (fixed payments) to a participant for the classroom-based learning (career awareness and exploration) and job shadowing activities. Successful completion of the activity must be documented as the basis of stipend payment. The activity should be of limited duration and be tied to specific learning goals. NGSP must describe on the Service Plan the activity and the goal to be achieved that will result in a stipend being paid.

- NGSP must develop a job shadowing and classroom-based stipend policy to guide how stipends may be paid for WEx activities. The policy and procedure for stipend payment must align with Uniform Guidance, 2 CFR Part 200.
- Wages and stipends must be issued in the form of a check or direct deposit. NO cash payments.

14 – SUPPORTIVE SERVICES & INCENTIVES

Supportive Services

Supportive services based on specific need as determined and deemed appropriate by NGSP may be provided to participants engaged in WEx activities. See the latest NGP “**Supportive Services Policy** ~~(NGPP 03-03)~~”.

Incentives

Incentive may be rewarded to participants upon successful completion of activities tied to identified WEx goals in the participant’s Service Plan. See the latest NGP “**Incentive Policy** ~~(NGPP 04-01)~~”

15 – WIOA WORKPLACE GUIDELINES

All employment State Statutes and Federal Administrative Codes concerning youth 14-17 engaged in WEx shall be followed. NGP reserves the right to monitor the employment and training activities of youth for compliance with all applicable provisions, Administrative Codes and requirements relating to the employment of children/minor.

REFERENCES:

State Workforce (TCSG) – Policies and Procedures Manual ~~(08/08/2019)~~ 02/18/2021

WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)

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Labor Law Standards

All labor standards where an employee/employer relationship exists, as defined by the Fair Labor Standards Act (FLSA) or applicable State law must be followed. TEGL 14-08 states that wage requirements under the FLSA apply to all participants employed under WIOA. Therefore, the provisions of FLSA apply to all participants engaged in a paid WEx, as do Federal and State minimum wage laws.

Non-Discrimination and Equal Opportunity

WIOA Section 188 (a)(2) prohibits discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief. WEx services must be provided to all participants provided the activities align with the participant's Service Plan.

Georgia State Workers' Compensation/Health and Safety Standards

WIOA §667.274 of the Federal Register 29 CFR Part 652 et al provides:

- “(a) Health and Safety Standards established under Federal and State law otherwise applicable to working conditions of employees are equally applicable to working conditions of participants engaged in programs and activities under Title I of WIOA. (b)(1) To the extent that a State Workers Compensation Law applies, workers' compensation must be provided to the participants in program 7 and activities under Title I of WIA on the same basis as the compensation is provided to other individuals in the State in a similar employment.”
- “(2) If a State Workers Compensation Law applies to a participant in work experience, workers' compensation benefits must be available for injuries suffered by the participant in such work experience. If a State Workers Compensation Law does not apply to a participant in work experience, insurance coverage must be secured for injuries suffered by the participant in the course of such work experience.”

Sectarian Placements

Under WIOA Section 188 (a)(3), WEx participants shall not be employed to carry out the construction, operation, or maintenance of any part of any facility that is used or to be used for sectarian instruction or as a place for religious worship (except with respect to the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship, in a case in which the organization operating the facility is part of a program or activity providing services to participants).

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REFERENCES:

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Equal Opportunity Employer/Program

16 – UNALLOWABLE PLACEMENTS

Displacement of Employees

20 CFR § 680.840 emphasizes that WEx funds may not be used directly or indirectly to support the following:

- A. Participants engaged in WEx cannot displace current employees.
- B. Participants should not be placed in a WEx when:
 - A regular employee is on layoff from the same or any substantially equivalent job; or the employer has terminated the employment of any regular unsubsidized employee or otherwise caused an involuntary reduction in its workforce with the intention of filling the vacancy with a WEx participant; or the job is created in a chain of command that infringes in any way on the promotional opportunities of currently employed workers; and/or
 - The placement results in a partial displacement, such as a reduction in the hours of non- overtime work, wages, or employment benefits, of any current employee (as of the date of the WEx participation); and/or
 - The placement impairs existing contracts for services or collective bargaining agreements; or “filling of a job opening that is vacant because the former occupant is on strike, or is being locked out in the course of labor dispute, or the filling ~~ed-of~~ which is otherwise an issue in a labor dispute involving a work stoppage”.

Non-allowable WEx Worksites

WEx placements cannot involve work in a casino or other gambling establishment, aquarium, zoo, golf course, swimming pool, and other occupations that may be prohibited for youth.

17 – DOCUMENTATION OF ELIGIBILITY & SERVICE DELIVERY

WEx services data and document requirements for the WorkSource Georgia Portal (also known as ~~VOS~~) are:

1. Documents to be uploaded – All documents indicated under “20 – ATTACHMENTS” section of this Policy, State & Federal tax forms (Form G-4 and Form W-4), and employment eligibility verification (Form I-9 and E-Verify).

REFERENCES:

State Workforce (TCSG) – Policies and Procedures Manual ~~(08/08/2019)~~ 02/18/2021

WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)

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2. Service Plan – Include goal(s) and objective(s) as indicated under “6 – ASSESSMENTS PRIOR TO WORK EXPERIENCE PLACEMENT” section of this Policy.
3. Case-notes – Document progress, challenges, successes and other relevant information related to the WEx.
4. Service Activity Code – The appropriate WEx service activity code must be assigned:
 - a) 400 – Youth Summer Employment
 - b) 401 – Preemployment Training/Work Maturity (must be used in conjunction with the other codes, not a stand-alone code)
 - ~~b)c)~~ 408 – Internship Un-Paid
 - ~~c)d)~~ 409 – Youth-Job Shadowing
 - ~~d)e)~~ 419 – Support Service – Stipends
 - ~~e)f)~~ 422 – Pre-Apprenticeship Training (Work Experience)
 - ~~f)g)~~ 423 – Pre-Apprenticeship Training (Classroom Training)
 - ~~g)h)~~ 425 – Work Experience – Paid
 - ~~h)i)~~ 426 – Work Experience – Un-Paid
 - ~~i)j)~~ 427 – Youth Internship – Paid
 - k) 428 – Youth On-the-Job Training
 - j)l) 435 – Education Offered Concurrently as Workforce Preparation Activity & Training for a Specific Occupation or Occupational Cluster

18 – MONITORING

NGSP must conduct monitoring and review of its WEx funds, program, services (to include WEx worksites,) on a regular basis. NGSP must have a process in place to demonstrate that monitoring is being conducted. The Worksite, NGSP’s WEP, services, and activities may be monitored by Federal or State (Technical College System of GA (TCSG)) agency and will be monitored by ARC/NGP staff. ~~will also conduct monitoring of the NGSP’s WEP, services and activities.~~ Monitoring will include, but is not limited to:

- In person or desk review of files to include Worksite Agreement, timesheets, performance, etc.;
- Worksites visits;
- Worksites, participants, and NGSP interviews; and
- Expenditures and invoices.

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REFERENCES:

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Equal Opportunity Employer/Program

19 – DEFINITIONS

- **ARC** – Atlanta Regional Commission
- **ARWDB** – Atlanta Regional Workforce Development Board
- **CFR** - Code of Federal Regulations
- ~~ITA – Individual Training Account~~
- **NGP** – NextGen Program
- **NGPP** – NextGen Program Policy
- **NGSP** – NextGen Service Provider
- **OJT** – On-the-Job Training
- **Sec./ §** – Section
- **Service Plan (ISS/ISP/IEP)** – Individual Service Strategy/ Individual Service Plan/ Individual Employment Plan
- TCSG/OWD – Technical College System of Georgia, Office of Workforce Development
- **TEGL** – Training and Employment Guidance Letter
- VOS – Virtual OneStop System (WorkSource Georgia Portal)
- **WEP** – Work Experience Program
- **WEx** – Work Experience
- **WIG PS** – Workforce Implementation Guidance Programmatic Services
- **WIOA** – Workforce Innovation and Opportunity Act
- ~~WorkSource Portal/VOS – / Virtual OneStop System~~

20 – ATTACHMENTS

The following documents are included as attachments to the Policy:

1. Worksite Agreement
2. Trainee Work Experience Agreement
3. Trainee Work Evaluation
4. Timesheet & Trainee Progress Evaluation

21 – ACTION REQUIRED

ARC/ARWDB NGP shall:

- Take the necessary action(s) to ensure compliance with this Policy.
- Ensure that the NGSPs are informed, trained and provided a copy of this Policy.

Page 12 of 13

REFERENCES:

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Equal Opportunity Employer/Program

221 – INQUIRES

Inquiries regarding this policy and its guidance should be directed to an ARC/ARWDB NGP
~~NextGen Program~~ staff.

232 – POLICY EFFECTIVE DATE

This policy shall be effective upon the ARWDB approval date indicated on the first page of this document, and ~~will~~ shall remain in effect until further notice.

REFERENCES:

State Workforce (TCSG) – Policies and Procedures Manual ~~(08/08/2019)~~ 02/18/2021

WIOA Public Law Sec. – 129(c)(2); 129(c)(4); 188(a)(2); 188(a)(3); 3(44); and 3(59)

Federal Register (Final Rules & Regulation) 20 CFR – § 680.700; § 681.480; § 681.540; § 681.550; § 681.570; § 681.580;
§ 681.590; § 681.590(b); § 681.600; § 681.840; § 683.260; and § 683.270

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Monthly Briefing Report

One Stop Operator

Reporting Period: September 2021

Equus Monthly Briefing Report

Focus Areas:

- Prior 30 Day Update
- Performance Metrics and Action Plans
- Next 30 Day Focus
- Innovation

Prior 30 Day Update

Over the past 30 days, our team has been working on the following:

1) Quality Assurance (Ongoing)

- The Customer Experience survey results are currently at 100 % for September 2021.

2) Partner Integration

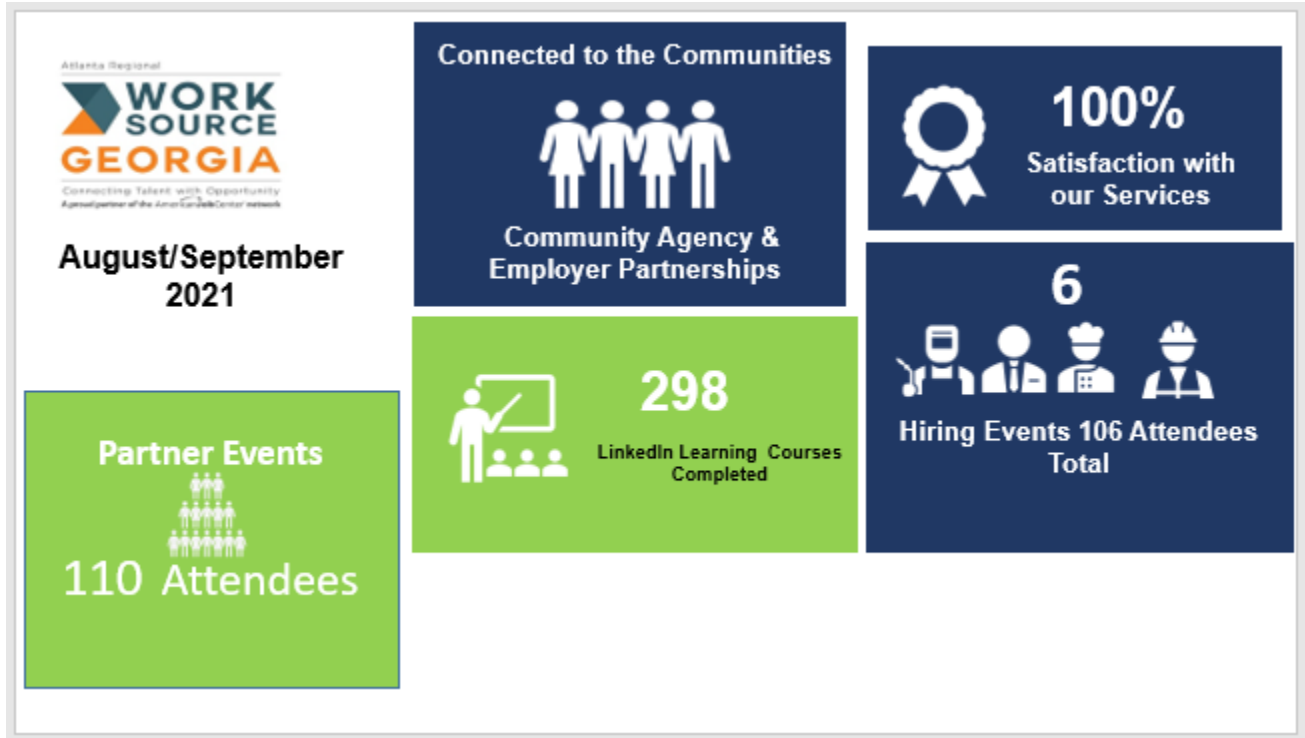
- The One Stop Center hosted various hiring events with Vera Bradley, Dover Staffing, Ricoh, and Corporate Temps. New employers include The Sheridan at Eastside, CoWorx and FedEx and PrideStaff, Victura Professionals and EpiBreads. Fall Job Fair on September 29th served 47 participants!
- Partner meetings still yielding 35+ partners each month.



Equus Monthly Briefing Report

- Clayton CRC hosted hiring events: Railworks Corporation, Avis Budget Group, Wise Staffing Group and Coach Consulting. Clayton County Staff attended a Senior Expo in September.
- New/Increased partnerships include-Continued approach toward a comprehensive center with CPACS (ARC Youth Provider) now being co-located in the One Stop in Gwinnett County.

Equus Monthly Briefing Report



Performance Metrics and Action Plans

Contractual

Project: GA ATLANTA WIOA ONE STOP (OSO) Project Director: Carlethia Collier

Benchmarks	Target/ Eff Target	Category, Freq	Contr ID	Jul21 ←	Aug21	Sep21	Oct21	Nov21	Dec21 ---Tar	Jan22 get---	Feb22	Mar22	Apr22	May22	Jun22 →
RAYS Training Completion	98% 98.00%	Completo Quarterly	30452	100.00% 98.00%	100.00% 98.00%	100.00% 98.00%		*	*	*	*	*	*	*	*
Partner Integration	3 3.00	Service Support Monthly	30452	3.00 3.00	3.00 3.00	3.00 3.00		*	*	*	*	*	*	*	*
Business Services	2 2.00	Service Support Monthly	30452	2.00 2.00	4.00 2.00	2.00 2.00		*	*	*	*	*	*	*	*
Customer Satisfaction Surveys	92% 92.00%	Quarterly	30452	100.00% 92.00%	100.00% 92.00%	100.00% 92.00%		*	*	*	*	*	*	*	*

Equus Monthly Briefing Report

Metrics

Action to sustain metrics:

One Stop Operator- Action Plan Sep-21

	Action Step	Primary Owner	Completion Date	Effect	Status	Comments
I. Customer Experience (Satisfaction) Rating						
1	Review results of the survey daily and make contact with participants to ensure above average customer experience.	One Stop Operator- Carlethia Collier	Ongoing	Ensures that participants voices are heard and allows for improved service delivery within the One Stop System.	Continuous	Conduct staff cross training. All individuals who attended any online webinars or workshops receive surveys. Include survey in all work that we do.
2	Ensure that resources are available, as well as wrap around services, to participants as soon as they enter the One Stop. (Shelters, Food Banks, employment opportunities)	One Stop Operator- Carlethia Collier	Ongoing	100.00 % for September 2021	Continuous	Resource webinars are conducted semi-monthly to share resources with participants within the community.
	Action Step	Primary Owner	Completion Date	Effect	Status	Comments
II. Rags Certification						
1	All Staff Certified in RAYS (Legacy in Action)-Integrity, Conduct, Respect and Customer Success	One Stop Operator- Carlethia Collier		Ensures that staff has knowledge of all the tools required to ensure that job seekers are getting optimal service when they enter the One Stop as well as virtually	Meeting 100%	Meeting Expectations
	Action Step	Primary Owner	Completion Date	Effect	Status	Comments
III. Integration of Partners						
1	Conduct Regular Partner Meetings to Share and improve resources (One per month)	One Stop Operator- Carlethia Collier	Ongoing	Allows partners to share information about resources and upcoming events	Conducted Monthly	Meeting Expectations- Conducted Virtually
2	Conduct/Host 2 additional partner events at the One Stop	One Stop Operator- Carlethia Collier	Ongoing	Increases knowledge about services provided at the One Stop and increase foot traffic/virtually to the One Stop.	Conducted Monthly	Meeting Expectations Conducted Virtually
	Action Step	Primary Owner	Completion Date	Effect	Status	Comments
IV. Business Services						
1	Conducting at least 2 hiring events per month	One Stop Operator- Carlethia Collier	Ongoing	Ensures that job seekers are consistently put in front of available job openings and networking events	Conducted Monthly	Discovering new online platforms to assist job seekers

Next 30 Day Focus

Seeking to coordinate a regional job fair with City of Atlanta and Fulton County and conducting a new soft skills workshop. Looking to conduct an Older Worker/SCSCEP hiring event in upcoming months.

Innovation

Continued push for virtual events; including cross training and assisting participants to register in various job search and learning platforms, such as the Georgia Worksource Portal, ATLworks.org, Career One Stop and LinkedIn Learning.



Senior Expo in Clayton County