

ROCK ISLAND TRI-COUNTY CONSORTIUM
(RITCC)

Programmatic Policies

Program Year 2023 and Following Program Years

WORKFORCE DEVELOPMENT BOARD
OF ROCK ISLAND, HENRY AND MERCER COUNTIES,
NOT-FOR-PROFIT CORPORATION (WDB)

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100-1 Accessibility Policy

Section 188 of WIOA prohibits the exclusion of an individual from participation in, denial of the benefits of, discrimination in, or denial of employment in the administration of or in connection with any programs and activities funded or otherwise financially assisted in whole or in part under Title I of WIOA because of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, participation in a program or activity that receives financial assistance under Title I of WIOA 29 CFR 38.

100-1 Accessibility Policy – Persons with Disabilities

Staff will provide all reasonable assistance to individuals with disabilities, providing access to services, including access to technology and materials available through the One-Stop system.

Staff will also provide reasonable assistance regarding Service Animals.

- Beginning on March 15, 2011, only dogs are recognized as service animals under titles II and III of the ADA.
- A service animal is a dog that is individually trained to do work or perform tasks for a person with a disability.
- Generally, title II and title III entities must permit service animals to accompany people with disabilities in all areas where members of the public are allowed to go.

Service animals are defined as dogs that are individually trained to do work or perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA.

Under the ADA, State and local governments, businesses, and nonprofit organizations that serve the public generally must allow service animals to accompany people with disabilities in all areas of the facility where the public is normally allowed to go.

However, Service Animals must be under control. Under the ADA, service animals must be harnessed, leashed, or tethered, unless these devices interfere with the service animal's work or the individual's disability prevents using these devices.

In that case, the individual must maintain control of the animal through voice, signal, or other effective controls.

100-1 Accessibility Policy – Persons with Disabilities – (Cont'd)

Inquiries, Exclusions, Charges, and Other Specific Rules Related to Service Animals

- When it is not obvious what service an animal provides, only limited inquiries are allowed. Staff may ask two questions: (1) is the dog a service animal required because of a disability, and (2) what work or task has the dog been trained to perform. Staff cannot ask about the person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task.
- Allergies and fear of dogs are not valid reasons for denying access or refusing service to people using service animals. When a person who is allergic to dog dander and a person who uses a service animal must spend time in the same room or facility, for example, in a school classroom or at a homeless shelter, they both should be accommodated by assigning them, if possible, to different locations within the room or different rooms in the facility.
- A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken. When there is a legitimate reason to ask that a service animal be removed, staff must offer the person with the disability the opportunity to obtain goods or services without the animal's presence.
- Establishments that sell or prepare food must allow service animals in public areas even if state or local health codes prohibit animals on the premises.
- People with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons, or charged fees that are not charged to other patrons without animals. In addition, if a business requires a deposit or fee to be paid by patrons with pets, it must waive the charge for service animals.
- If a business such as a hotel normally charges guests for damage that they cause, a customer with a disability may also be charged for damage caused by himself or his service animal.
- Staff are not required to provide care or food for a service animal.

100-1 Accessibility Policy – Persons with Limited English Proficiency

Staff will take reasonable steps, appropriate to the circumstances, to ensure interpretative services are provided that demonstrate the level of fluency, comprehension, and confidentiality warranted by the nature, type, and purpose of the information at issue.

100-1 Accessibility Policy – Persons with Limited English Proficiency – (Cont'd)

Reasonable steps generally may include, but are not limited to:

1. An assessment of an LEP individual to determine language assistance needs; providing oral interpretation or written translation of both hard copy and electronic materials, in the appropriate non-English languages, to LEP individuals; and outreach to LEP communities to improve service delivery in needed languages.
2. Reasonable steps to provide meaningful access to training programs may include, but are not limited to, providing:
 - A. Written training materials in appropriate non-English languages by written translation or by oral interpretation or summarization; and
 - B. Oral training content in appropriate non-English languages through in-person interpretation or telephone interpretation.
3. The LWIA should ensure that every program delivery avenue (*e.g.*, electronic, in person, telephonic) conveys in the appropriate languages how an individual may effectively learn about, participate in, and/or access any aid, benefit, service, or training that the LWIA provides.

Aid, benefit, service, or training means WIOA Title I-financially assisted services, financial or other aid, training, or benefits provided by or through a recipient or its employees, or by others through contract or other arrangements with the recipient. Aid, benefit, service, or training includes, but is not limited to:

- (1) Career Services;
- (2) Education or training;
- (3) Supportive services;
- (4) Work opportunities; and
- (5) Any aid, benefits, services, or training provided in or through a facility that has been constructed, expanded, altered, leased, rented, or otherwise obtained, in whole or in part, with Federal financial assistance under Title I of WIOA.

100-2 Business Services Policy

According to WIOA Section 108(b)(4)(B) Business Services are intended to promote, market, connect, and provide access to initiatives such as: Worker Adjustment Retraining Notice (WARN), rapid response, incumbent worker training programs, On-The-Job training programs, customized training programs, apprenticeship promotion, assistance for apprenticeships, recruiting employers to American Job Centers, connecting job seekers and employers by facilitating relationships.

100-2 Business Services Policy – (Cont'd)

These programs are designed to meet the needs of employers in relation to the economic needs. It is the responsibility of business service staff to perform ongoing outreach activities.

American Job Centers are locations where employers can connect with staff to help identify, attract, and select best-qualified candidates to fill open positions. American Job Centers offer many services to address the diverse needs of companies. These programs include:

- 1) Customized hiring events to connect with applicants who meet specific skill requirements.
- 2) Job Fairs to join other businesses at larger recruiting events.
- 3) Applicant screening that involves resume review and candidate assessments.
- 4) Assessments to measure skills, interests, and job-readiness of applicants.
- 5) Meeting space to allow companies to hold meetings, provide training, conduct orientations, or schedule interviews.

100-3 Complaint and Grievance Policy

Applicants and participants of the WIOA program, including applicants for employment, and employees, have the right to enter into the grievance process to resolve disputes. Complaints and grievances from participants and other interested parties affected by the local Workforce Innovation System, including One-Stop partners and service providers may file a complaint/grievance. Complaint/grievances must be filed in writing after the alleged WIOA violation took place. Individuals in grievance investigations are protected from retaliation and are permitted to have translators, interpreters, readers and /or a representative of their choice during the grievance process. The grievance procedures are as follows:

1. Complaints/grievances must be filed in writing within 180 days after the alleged violation took place. The complaint must include;
 - Name, address, and telephone number of complainant
 - Clear and concise statement of allegations; including dates, locations and persons involved.
 - Desired resolution being sought.
2. The complaint/grievance can be filed with any employee of the American Job Center. The complaint will be immediately forwarded to the EO Officer, who shall acknowledge receipt of grievance within 10 days.
3. Upon receipt of the complaint/grievance the Equal Opportunity (EO) Officer will conduct an informal hearing or arrange a meeting with the complainant/grievant and attempt to resolve the matter informally. If the EO Officer resolves the matter informally, the EO Officer will issue a decision in writing and the matter is closed. If the matter is not resolved to the satisfaction of the complainant/grievant, the complainant/grievant may file an appeal. The appeal must be filed in writing.

Grievances and complaints alleging nondiscrimination brought under WIOA Section 188 and 29 CFR Part §38 must be handled according to the procedures described in the discrimination complaint policies and procedures section. Complaints or grievances may be filed when the grievant/complainant believes it to be discrimination related to: age; race; color; religion; sex (sexual identity, sexual expression, sex stereotyping, pregnancy); national origin; political belief or affiliation; and against any beneficiary of programs financially assisted under Title VI of the WIOA on the basis of the beneficiary's citizenship/status; as a lawfully admitted immigrant authorized to work in the United States; or his or her participation in any WIOA Title-I financially assisted program/activity. Written complaints must be filed within 180 days from the date the violation took place. Investigations and decision must be issued within 90 days from the date the complaint was filed.

100-4 Confidentiality including Personally Identifiable Information (PII) Policy

Rock Island Tri-County Consortium and its employees have an ethical and legal obligation to respect the privacy of our clients, and to protect and maintain the confidentiality of all information obtained about clients, while providing service to them.

The Personally Identifiable Information (PII) Policy will provide guidance for compliance in handling and protecting PII in the local workforce investment area. This policy applies to all WIB, program staff, oversight provider staff, contractor staff, grantees, sub-grantees, and any other individuals or groups involved in the handling and protecting of PII per governing guidelines including federal law, OMB guidance, United States Department of Labor, Employment and Training Administration policies (see Training and Employment Guidance Letter No. 39-11), as well as any relevant state and local requirements. As part of grant activities, WIB, program staff, oversight provider staff, contractor staff, grantees, sub-grantees and other individuals or groups may have in their possession PII relating to their organization and staff, subgrantee and partner organizations and staff and individual program participants. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files and other sources. Federal law, OMB guidance, federal, state and local policies require that PII and other sensitive information be protected. To ensure compliance with these policies/regulations, PII and sensitive data developed, obtained or otherwise associated with grantee funding must be secured and protected at all times.

- 1) All parties must take the steps necessary to ensure the privacy of all PII obtained from participants and/or other individuals and to protect such information from unauthorized disclosure.
- 2) All parties must ensure that PII used during the performance of their grant has been obtained in conformity with applicable Federal and state laws governing the confidentiality of information.
- 3) All parties must acknowledge that all PII data obtained through their program activity shall be stored in an area that is physically safe from access by unauthorized persons at all times and be managed with appropriate information technology (IT) services and designated locations. Accessing, processing and storing of PII data on personally owned equipment at off-site locations (e.g. employee's home, and non-grantee managed IT services such as Yahoo mail) is strictly prohibited.
- 4) All parties who will have access to sensitive/confidential/proprietary/private data must be advised of the confidential nature of the information, the safeguards required to protect the information, and that there are civil and criminal sanctions for noncompliance with such safeguards within the Federal and state laws.

100-4 Confidentiality including Personally Identifiable Information (PII) Policy – (Cont'd)

5) All parties must take the steps necessary to ensure the privacy of all PII obtained from participants and/or other individuals and to protect such information from unauthorized disclosure.

6) All parties must ensure that PII used during the performance of their grant has been obtained in conformity with applicable Federal and state laws governing the confidentiality of information.

7) All parties must acknowledge that all PII data obtained through their program activity shall be stored in an area that is physically safe from access by unauthorized persons at all times and be managed with appropriate information technology (IT) services and designated locations. Accessing, processing and storing of PII data on personally owned equipment at off-site locations (e.g. employee's home, and non-grantee managed IT services such as Yahoo mail) is strictly prohibited.

8) All parties who will have access to sensitive/confidential/proprietary/private data must be advised of the confidential nature of the information, the safeguards required to protect the information, and that there are civil and criminal sanctions for noncompliance with such safeguards within the Federal and state laws.

DEFINITIONS

Personal Identifiable Information (PII): OMB defines PII as information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Sensitive Information: Any unclassified information whose loss, misuse or unauthorized access to or modification of could adversely affect the interest or the conduct of Federal programs or the privacy to which individuals are entitled under the Privacy Act.

Protected PII and Non-Sensitive PII: The Department of Labor has defined two types of PII, protected PII and non-sensitive PII. The differences between protected PII and non-sensitive PII are primarily based on an analysis regarding the "risk of harm" that could result from the release of the PII.

1. Protected PII is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history,

100-4 Confidentiality including Personally Identifiable Information (PII) Policy – (Cont'd)

biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information and computer passwords.

2. Non-sensitive PII, on the other hand, is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. Essentially, it is stand-alone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general educational credentials, gender or race. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII.

100-5 Conflict of Interest Policy

A conflict of interest is defined as an actual or perceived interest by a staff or Board member in an action that results in, or has the appearance of resulting in, personal, organizational, or professional gain. Officers and members are obligated to always act in the best interest of the organization. This obligation requires that any officer or member, in the performance of organization duties, seek only the furtherance of the organization mission. At all times, officers and board members are prohibited from using their job title or the organization's name or property, for private profit or benefit.

A. The staff and board members of the organization should neither solicit nor accept gratuities, favors, or anything of monetary value from contractors/vendors. This is not intended to preclude bona-fide organization fund raising-activities.

B. No employee, officer, and/or board member of the organization shall participate in the selection, award, or administration of a purchase or contract with a vendor where, to his knowledge, any of the following has a financial interest in that purchase or contract:

1. The officer or member;
2. Any member of their immediate family;
3. Their partner;
4. An organization in which any of the above is an officer, director or employee; or
5. A person or organization with whom any of the above individuals is negotiating or has an arrangement concerning prospective employment.

100-5 Conflict of Interest Policy – (Cont'd)

C. Disclosure--Any possible conflict of interest shall be disclosed by the person or persons concerned.

D. Board Action--When a conflict of interest is relevant to a matter requiring action by the Board, the interested person(s) shall call it to the attention of the Board and said person(s) shall not vote on the matter. In addition, the person(s) shall not participate in the final decision or related deliberation regarding the matter under consideration. When there is a doubt as to whether a conflict exists, the matter shall be resolved by vote of the Board of Trustees, excluding the person(s) concerning whose situation the doubt has arisen.

E. Record of Conflict--The official minutes of the Board shall reflect that the conflict of interest was disclosed and the interested person(s) did not participate in the final discussion or vote and did not vote on the matter.

100-6 Harassment & Discrimination Policy

Harassment

Harassment of an individual based on race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, based on citizenship status or participation in any WIOA Title I-financially assisted program or activity, is a violation of the nondiscrimination provisions of WIOA and this part.(a) Unwelcome sexual advances, requests for sexual favors, or offensive remarks about a person's race, color, religion, sex, national origin, age, disability, political affiliation or belief, or citizenship or participation, and other unwelcome verbal or physical conduct based on one or more of these protected categories constitutes unlawful harassment on that basis when: (1) Submission to such conduct is made either explicitly or implicitly a term or condition of accessing the aid, benefit, service, or training of, or employment in the administration of or in connection with, any WIOA Title I-financially assisted program or activity;(2) Submission to or rejection of such conduct by an individual is used as the basis for limiting that individual's access to any aid, benefit, service, training, or employment from, or employment in the administration of or in connection with, any WIOA Title I-financially assisted program or activity; or(3) Such conduct has the purpose or effect of unreasonably interfering with an individual's participation in a WIOA Title I-financially assisted program or activity creating an intimidating, hostile or offensive program environment.(b) Harassment because of sex includes harassment based on gender identity; harassment based on failure to comport with sex stereotypes; harassment based on pregnancy, childbirth, and related medical conditions; and sex-based harassment that is not sexual in nature but that is because of sex or where one sex is targeted for the harassment.

100-6 Harassment & Discrimination Policy – (Cont'd)

Discrimination

Discrimination prohibited based on citizenship status. In providing any aid, benefit, service, or training under a WIOA Title I-financially assisted program or activity, a recipient must not directly or through contractual, licensing, or other arrangements, discriminate based on citizenship status. Individuals protected under this section include citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Secretary of Homeland Security or the Secretary's designee to work in the United States. Citizenship discrimination occurs when a recipient maintains and enforces policies and procedures that have the purpose or effect of discriminating against individual beneficiaries, applicants, and participants, on the basis of their status as citizens or nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, or other immigrants authorized by the Secretary of Homeland Security or the Secretary's designee to work in the United States.

Discrimination prohibited based on disability. (a) In providing any aid, benefit, service, or training under a WIOA Title I-financially assisted program or activity, a recipient must not, directly or through contractual, licensing, or other arrangements, on the basis of disability:(1) Deny a qualified individual with a disability the opportunity to participate in or benefit from the aid, benefit, service, or training, including meaningful opportunities to seek employment and work in competitive integrated settings;(2) Afford a qualified individual with a disability an opportunity to participate in or benefit from the aid, benefits, services, or training that is not equal to that afforded others;(3) Provide a qualified individual with a disability with any aid, benefit, service, or training that is not as effective in affording equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as that provided to others;(4) Provide different, segregated, or separate aid, benefit, service, or training to individuals with disabilities, or to any class of individuals with disabilities, unless such action is necessary to provide qualified individuals with disabilities with any aid, benefit, service, or training that is as effective as those provided to others, and consistent with the requirements of the Rehabilitation Act as amended by WIOA, including those provisions that prioritize opportunities in competitive integrated employment;(5) Deny a qualified individual with a disability the opportunity to participate as a member of planning or advisory boards; or(6) Otherwise limit a qualified individual with a disability in enjoyment of any right, privilege, advantage, or opportunity enjoyed by others receiving any aid, benefit, service, or training.

100-6 Harassment & Discrimination Policy – (Cont'd)

(b) A recipient must not, directly or through contractual, licensing, or other arrangements, aid or perpetuate discrimination against qualified individuals with disabilities by providing significant assistance to an agency, organization, or person that discriminates on the basis of disability in providing any aid, benefit, service, or training to registrants, applicants, or participants.

(c) A recipient must not deny a qualified individual with a disability the opportunity to participate in WIOA Title I-financially assisted programs or activities despite the existence of permissibly separate or different programs or activities.

(d) A recipient must administer WIOA Title I-financially assisted programs and activities in the most integrated setting appropriate to the needs of qualified individuals with disabilities.

(e) A recipient must not, directly or through contractual, licensing, or other arrangements, use standards, procedures, criteria, or administrative methods:(1) That have the purpose or effect of subjecting qualified individuals with disabilities to discrimination on the basis of disability;(2) That have the purpose or effect of defeating or substantially impairing accomplishment of the objectives of the WIOA Title I-financially assisted program or activity with respect to individuals with disabilities; or(3) That perpetuate the discrimination of another entity if both entities are subject to common administrative control or are agencies of the same State.

(f) In determining the site or location of facilities, a grant applicant or recipient must not make selections that have any of the following purposes or effects:(1) On the basis of disability: (i) Excluding qualified individuals from a WIOA Title I-financially assisted program or activity;(ii) Denying qualified individuals the benefits of such a program or activity; or(iii) Subjecting qualified individuals to discrimination; or(2) Defeating or substantially impairing the accomplishment of the disability-related objectives of either:(i) The WIOA Title I-financially assisted program or activity; or(ii) The nondiscrimination and equal opportunity provisions of WIOA or this part.

(g) A recipient, in the selection of contractors, must not use criteria that subject qualified individuals with disabilities to discrimination on the basis of disability.

(h) A recipient must not administer a licensing or certification program in a manner that subjects qualified individuals with disabilities to discrimination on the basis of disability, nor may a recipient establish requirements for the programs or activities of licensees or certified entities that subject qualified individuals with disabilities to discrimination on the basis of disability. The programs or activities of entities that are licensed or certified by a recipient are not, themselves, covered by this part.

100-6 Harassment & Discrimination Policy – (Cont'd)

(i) A recipient must not impose or apply eligibility criteria that screen out or tend to screen out individuals with disabilities or any class of individuals with disabilities from fully and equally enjoying any aid, benefit, service, training, program, or activity, unless such criteria can be shown to be necessary for the provision of any aid, benefit, service, training, program, or activity being offered.

(j) Nothing in this part prohibits a recipient from providing any aid, benefit, service, training, or advantages to individuals with disabilities, or to a particular class of individuals with disabilities, beyond those required by this part.

(k) A recipient must not place a surcharge on a particular individual with a disability, or any group of individuals with disabilities, to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, that are required to provide that individual or group with the nondiscriminatory treatment required by WIOA Title I or this part.

(l) A recipient must not exclude, or otherwise deny equal aid, benefits, services, training, programs, or activities to, an individual or entity because of the known disability of an individual with whom the individual or entity is known to have a relationship or association.

(m) The exclusion of an individual without a disability from the benefits of a program limited by federal law to individuals with disabilities, or the exclusion of a specific class of individuals with disabilities from a program limited by Federal statute or Executive Order to a different class of individuals with disabilities, is not prohibited by this part.

(n) This part does not require a recipient to provide any of the following to individuals with disabilities:(1) Personal devices, such as wheelchairs;(2) Individually prescribed devices, such as prescription eyeglasses or hearing aids;(3) Readers for personal use or study; or(4) Services of a personal nature, including assistance in eating, toileting, or dressing.

(o)(1) Nothing in this part requires an individual with a disability to accept any accommodation, aid, benefit, service, training, or opportunity provided under WIOA Title I or this part that such individual chooses not to accept.(2) Nothing in this part authorizes the representative or guardian of an individual with a disability to decline food, water, medical treatment, or medical services for that individual.

(p) *Claims of no disability.* Nothing in this part provides the basis for a claim that an individual without a disability was subject to discrimination because of a lack of disability, including a claim that an individual with a disability was granted auxiliary aids or services, reasonable modifications, or reasonable accommodations that were denied to an individual without a disability.

100-6 Harassment & Discrimination Policy – (Cont'd)

**Complaints and/or grievances shall follow procedures outlined in section 100-3 Complaint & Grievance Policy.*

100-7 Integration of Services Policy – Co-Enrollment

Co-Enrollment is defined as enrollment in two or more partner programs as defined in WIOA. Co-enrollments will always be for the benefit of the Customer and will be used to leverage services that are available to ensure a positive outcome. Coordination of co-enrollment will eliminate the duplication of these services and reduce the amount of time staff spends providing services such as case management, job search assistance, and follow-up services. The American Job Center should seek to co-enroll for the benefit of the Customer with services from other programs that supplement and/or enhance those services not to duplicate them.

In order to serve the needs of the Customers better and to avoid duplication of services, co-enrollments will require a great deal of coordination within the American Job Center network. It must be clear at all times what services are being provided and by whom. The coordination will include:

1. Determine at intake whether or not a Customer is already enrolled in another program.
2. If a Customer is enrolled in another WIOA partner program, co-enrollment will first be discussed with the initial AJC. Additionally, if an AJC seeks to refer a Customer to another program, the possibility of co-enrollment will be discussed with the new AJC or Service Provider. All information regarding the co-enrollment will be documented in IWDS.
3. There will be one primary enrolling AJC or Service Provider. This will normally be the first enrolling service provider.
4. The primary enrolling service provider will coordinate activities and ensure all services are documented in the Customer's case notes and individual Employment Plan (IEP).
5. Normally, a co-enrolled Customer may receive an Individual Training Account (ITA) but may receive an On-the-Job Training (OJT) that is linked to the vocational training provided by the ITA. Training caps must be maintained per individual enrollment period.
6. Placement information will be shared among the AJC. The primary enrolling service provider will enter the outcomes form into IWDS.
7. Exit decisions must be coordinated within the AJC and Service Providers. Only one Service Provider can be the "exiting" agency.
8. Follow-up activities and services will be coordinated between both Service Providers.

100-8 Priority of Service Policy – Veterans

Veterans and eligible spouses continue to receive priority of service for all DOL funded job training programs, which include WIOA programs. However, as described in TEGL 10-09, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority for Adult funds, priority must be provided in the order described below.

A Veteran must meet each program’s eligibility criteria to receive services under the respective employment and training program. For income-based eligibility determinations and for determining priority of service, military pay or allowances paid while on active duty or paid by the Department of Veterans Affairs (VA) for vocational rehabilitation, disability payments, or related VA-funded programs are not to be considered as income, in accordance with 38 U.S.C. 4213 and 20 CFR 683.230.

Priority must be provided in the following order:

1. To Veterans and eligible spouses who are also included in the groups given statutory priority for WIOA Adult formula funding. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services with WIOA Adult formula funds for individualized career services and training services.
2. To non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
3. To Veterans and eligible spouses who are not included in WIOA’s priority groups.
4. Priority populations established by the Governor and /or Local WDB.
5. To non-covered persons outside the groups given priority under WIOA.

100-8 Priority of Service Policy

Section 134(c)(3)(E) of WIOA establishes a priority requirement for adult employment and training activities. Under this section, American Job Center staff when using WIOA Adult or Dislocated Worker funds to provide individualized career services, training services, or both must give priority to recipients of public assistance, other low-income individuals, and individuals who are basic skillsdeficient. WIOA sec. 3(36) defines “low-income individual” and WIOA sec. 3(5) defines “basic skillsdeficient”. Individuals who are English Language Learners meet the criteria for “basic skillsdeficient” and must be included in the priority populations for the Title I Adult Program.

While we recognize the Quad Cities as one community, we will give priority to residents and businesses in LWIA 13 and Illinois for all WIOA funding.

100-9 Selective Service Policy

If the male customer has not reached age 18, and will not within the next 30 days, or was born before January 1, 1960, the Military Selective Service Act (MSSA) is not applicable to that individual.

A male who attains the age of 18 while participating in the program must be registered with Selective Service by the 30th day after his 18th birthday to remain eligible. He may also register in the 30 days prior to his 18th birthday. If the customer fails to register within 30 days after his 18th birthday, all existing WIOA services must be closed.

All other male customers must be registered prior to their 26th birthday, unless the following exceptions apply:

- a) A male who is serving in the military on full-time active duty;
- b) A male attending the service academies;
- c) A disabled male who is continually confined to a residence, hospital, or institution;
- d) A male who is hospitalized, institutionalized, or incarcerated.

If a male is released from any of the above conditions before he reaches the age of 26, he is required to register with Selective Service within 30 days of his release.

For non-United States citizens, Selective Service registration is required within 30 days of becoming a resident unless the man came into this country for the first time after his 26th birthday.

Any male customer that is beyond their 26th birthday can no longer register but is required to provide documentation of their compliance to the Selective Service requirement in order to be considered eligible for any WIOA services.

Failure to produce authorized documentation required that the individual acquire a Status Information Letter (SIL) from Selective Service indicating whether he was required to register.

- 1) If the SIL indicates that he was not required to register and the Selective Service Verification Form (OET /SS Form #001) is completed, then the client can request and be approved for a Locally Approved Selective Service Waiver and be enrolled in WIOA funded services. Primary individual that will be responsible for making decisions regarding Locally Approved Selective Service Waivers is the Deputy Director. Secondary individual that will be responsible for making decisions regarding Locally Approved Selective Service Waivers is the Executive Director when Deputy Director is unavailable.

100-9 Selective Service Policy – (Cont'd)

- 2) If the SIL indicates that he was required and failed to register and now is unable to, as a result of being 26 years of age or older, he is to be disqualified from WIOA-funded programs and services until it is determined that his failure was not knowing or willful.

Once verification has been completed:

- 1) If the male customer has complied with MSSA, he may be entered as such on IWDS and no further action is necessary.
- 2) If the male customer has not complied with MSSA, all WIOA services, beyond basic, non-staff assisted career services should be discontinued, as they will be disallowed until it is determined that they are in compliance.

However, if the customer has failed to comply with Selective Service and is over the age of 26, he can no longer register to achieve compliance and must fill out the RSIL form explaining why he did not register. A copy of the RSIL and the attached form, (OET/SS Form #001), must be signed by the male customer and maintained in the customer's file.

100-10 Subrecipient Monitoring

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200) ("Uniform Guidance"), specifically §200.331, requires pass-through entities to evaluate each subrecipient's risk of noncompliance in order to determine the appropriate monitoring level, monitor the activities of subrecipient organizations to ensure that the subaward is in compliance with applicable Federal statutes and regulations and terms of the subaward, and verify that subrecipients are audited as required by Subpart F of the Uniform Guidance. Rock Island Tri-County Consortium is responsible for monitoring the programmatic and financial activities of its subrecipients to ensure proper stewardship of sponsor funds. This monitoring will occur, at a minimum, on an annual basis.

200-1 Career Services Policy

All customers are eligible to receive WIOA Career Services. These Career Services may be provided by any of the Core Partners of the One-Stop delivery system or the American Job Center. These Career Services include but are not limited to: eligibility information for services, orientation, assessment, career information, labor market information, performance and cost information supportive services, Unemployment information, financial aid information, career planning and counseling, out-of-area job search, financial literacy and workforce preparation.

200-1 Career Services Policy – (Cont'd)

Customers who are unsuccessful at obtaining employment and need additional assistance to become employed may receive additional assistance.

These customers must be certified as eligible as either an adult, dislocated worker or youth and provide the required documentation. Once customers have been registered and enrolled, they count towards performance standards.

200-2 Youth Eligibility Policy

To Participate in the WIOA youth program, a youth must meet basic eligibility requirements as defined by federal mandate and the local plan to participate in the WIOA Youth program.

To be eligible a youth must:

1. Be a U.S. Citizen or Non-Citizen authorized to work in the U.S.;
2. Meet Military Selective Service registration requirements, if applicable; AND
3. Meet either the WIOA Out-of-School Youth or In-School Youth eligibility requirements.

Out-of-School Youth (OSY)

To qualify as an out-of-school (OSY), the youth must be:

1. Not attending any school (as defined under State law);
2. Not younger than 16 or older than 24 at time of enrollment. (Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 24 once they are enrolled in the program); AND
3. One or more of the following:
 - a. A school dropout;
 - b. A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete schoolyear calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters;
 - c. A recipient of a secondary school diploma or its recognized equivalent who is a low income individual and is either basic skills deficient/low levels of literacy or an English language learner;
 - d. An individual who is subject to the juvenile or adult justice system;
 - e. A homeless individual, a homeless child or youth, a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement;
 - f. An individual who is pregnant or parenting, including non-custodial parents;
 - g. An individual with a disability;

200-2 Youth Eligibility Policy – (Cont'd)

- h. A low-income individual who “requires additional assistance to enter or complete an educational program or to secure or hold employment.” Additional Assistance includes but is not limited to;
- Is or was a Ward of the State
 - Has been referred to or treated by an agency for substance abuse/ psychological problems
 - A victim of domestic abuse or violence
 - Has a currently incarcerated parent(s)
 - Has neither the work experience nor the credential required for an occupation in demand for which training is necessary and will be provided
 - Has been fired from a job within the 6 months prior to application
 - Has never held a full-time job for more than 13 consecutive weeks
 - Minority youth
 - Youth with disabilities
 - Youth with limited English proficiency
 - Youth in family receiving welfare assistance
 - 18 -24 year-old recently released from active duty

In-School Youth (ISY)

To qualify as an In-School Youth (ISY), the youth must be:

1. Attending school (as defined by State Law);
2. Not younger than age 14 or older than age 21 (unless an individual with a disability who is attending school under State Law) at time of enrollment. (Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 21 once they are enrolled in the program);
3. A low-income individual; AND
4. Meets one or more of the following barriers provided in WIOA Section 129 (a)(1)(C)(iv):
 - a. Basic skills deficient;
 - b. An English Language Learner;
 - c. Connected to juvenile/adult justice system;
 - d. A homeless youth, a runaway, foster youth or has aged out of the foster care system;
 - e. An individual who is pregnant or parenting;
 - f. An individual with a disability;

200-2 Youth Eligibility Policy (Cont'd)

- g. An individual who “requires additional assistance to enter or complete an educational program or to secure or hold employment.” Additional Assistance includes but is not limited to;
- Is at risk of dropping out of high school due to grades/credits/attendance/not passing proficiency exam or has had an out of school suspension or expulsion from school.
 - Has a court/agency referral mandating school attendance
 - Is attending an alternative school/ education program or has been enrolled in an alternative school with in the last 12 months
 - Is or was a Ward of the State
 - Has been referred to or treated by an agency for substance abuse / psychological problems
 - A victim of domestic abuse or violence
 - Has a currently incarcerated parent(s)

If the family of a disabled youth does not meet the income eligibility criteria, then the disabled youth may be considered a low-income individual if the youth’s own income: i. Meets the income criteria established in WIOA Section 3(36)(A); ii. Meets the income eligibility criteria for cash payments under any Federal, State, or local public assistance program; OR iii. Meets the low-income definition clause (ii) (income that does not exceed the higher of the poverty line or 70% of the lower living standard income level; but who is a member of a family whose income exceeds this income requirement is eligible for youth services.

300-1 Adult Education and Literacy Policy

Pursuant to 34 CFT Part 463.1 the purpose of the Adult Education and Family Literacy policy is to:

1. Assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency,
2. Assist adults who are parents of family members to obtain the education and skills that are necessary to becoming full partners in the educational development of their children; and lead to sustainable improvements in the economic opportunities for their family,
3. Assist adults in attaining a secondary school diploma or its recognized equivalent and in the transition to postsecondary education and training, through career pathways; and
4. Assist immigrants and other individuals who are English language learners in improving their reading, writing, speaking, and comprehension skills in English; and mathematics skills; and acquiring an understanding of the American system of Government, individual freedom, and the responsibilities of citizenship.

300-2 Approved Training Provider Policy

Individual Training Accounts for classroom training can only be issued for approved training facilities and programs. Procedures are as follows:

1. Staff must first check the Demand Occupation/Approved training list to verify that the training is approved. Staff must also verify the provider has been approved and is entered in the state MIS system prior to issuing a voucher for classroom training.
2. If the customer wants to attend training at a facility or in a program that is not approved, staff will inform the customer and contact the Lead Career Planner in an effort to begin the approval process.
3. Any questions from a facility regarding gaining approval for their facility or program should be directed to the Lead Career Planner.

300-3 Basic Skills Assessments Policy

American Job Center provides and requires assessments to measure the achievement of literacy and language skills for adult students and ties achievement to quality and performance. In addition, a comprehensive performance accountability system is required by the Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L. 113-128).

Using required standardized assessments and the Basic Screen Tool developed by DCEO for accountability, programs use assessments for instructional purposes. Assessment data should be used to inform program evaluation and instructional design to better meet the needs of students.

Quality assessment data plays a major role in many areas to:

1. Inform students about skill levels and place them in the most appropriate instructional program;
2. Help students determine short- and long-term goals;
3. Use information as a diagnostic guide to instruction;
4. Plan and develop professional development activities;
5. Manage program improvement and planning and assess comparability across local programs.

Another purpose of assessment is to assist students in exploring their strengths and weaknesses and developing an understanding of where their strength lies and what areas may need further development to obtain or retain employment, attain their High-School Equivalency (GED), or enter postsecondary education or vocational/occupational training.

300-3 Basic Skills Assessments Policy (Cont'd)

Assessments are to be used to develop the Individual Employment Plan (IEP) as described in the Individual Employment Plan policy and procedures section.

300-4 Incumbent Worker Training Policy

Incumbent Worker Training (IWT) is job-related training, reimbursable with Workforce Innovation & Opportunity Act (WIOA) funds, that is provided to worker(s) employed with an eligible employer who meets the definition of incumbent worker as provided below. These funds may be used to:

- Coordinate Workforce Innovation and Opportunity services with State, Regional and local economic development efforts with the broad goal of increasing the available pool of skilled labor in the region.
- Target training services to employed populations judged to be in need of additional training to help them advance in their careers and increase earnings.
- Provide employers (or groups of employers) a capacity-building tool to retain a skilled workforce long term.
- Provide a layoff aversion tool to assist the loss of workforce

Under 20 CFR subpart F Section 134(d)(4) Rock Island Tri-County Consortium (RITCC) may divert up to 20 percent of WIOA Adult and Dislocated Worker allocation for incumbent worker training.

Targeted Industries

State policy requires advance identification of industry sectors to be targeted to receive incumbent worker training initiatives including: Business and Professional Services, Healthcare, Hospitality, Information Technology, Manufacturing, Retail, Transportation/Distribution/Logistics and Construction. Incumbent worker training may also be provided regardless of the employer's industry if the training is directly linked to layoff aversion or being provided in concert with other State or local economic development agencies business retention efforts.

Employer Eligibility Requirements

- Employer assures that no Worker Adjustment and Retraining Notification (WARN) Act notices have been filed in the last year.
- Employer has operated in current location for at least 120 days. If business is less than 120 days and the business relocated from another area in the United States, employees can not have been laid off at previous location as a result of the relocation.

Incumbent Worker Trainees

Trainees need not be determined eligible to receive WIOA training services, but must either individually or as a group meet the following criteria:

- Employed.
- Meet the Fair Labor Standards Act requirement for an employer-employee relationship.
- Have an established full-time employment history for 6 month or more (including temporary or contract work. If IWT is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six (6) months or more, if the majority of employees being trained meets the employment history requirement.

- Through June 30, 2022, US DOL approved a waiver to allow employees who have not worked at the company for more than 6 months to participate in IWT
- Is receiving upgrade training to increase skills in current occupation, or to prepare for entry into a new occupation withing that employer's workforce.

Training

Employers may propose a wide range of training topics and delivery arrangements. Training that is closely linked to specific jobs, as well as job advancement is encouraged. Proposed training that is only loosely related, or is unrelated, to specific jobs, while not completely prohibited, is discouraged. Examples of training that is not directly job-linked include; soft/essential skills training, stand-alone adult basic education (ABE), stand-alone English as a Second language (ESL), team building, motivational training, basic computer literacy skills, professional development and new hire orientation. Please note that ABE and ESL and safety training that is fully integrated with specific job-linked skill training is allowable.

RITCC will closely examine proposals for such training and the rationale supporting the need for the training to determine the likelihood that the policy objectives would be achieved by funding such proposals.

All Incumbent Worker Training programs must include a contract/written agreement that outlines the following:

- a. Who is providing the training;
- b. What training will be provided;
- c. Where the training will be provided;
- d. The length of the training including start and end dates, number of days per week and number of hours per day;
- e. The cost of the training program (to include only reasonable and acceptable costs).
- f. How many employees will be trained- amount of matching support and how it will be provided
- g. Certification of employment status for all employees to be trained (date employee was hired)
- h. An agreement by employer to provide company information necessary to track worker and project activity and outcomes within 30 days of the end of the calendar quarter.

Matching Funds

Employers participating in the program are required to pay a non-federal share of the costs of providing the Incumbent Worker Training. The non-federal share paid by an employer (or group of employers) may include the amount of the wages paid by the employer(s) to a worker while the worker is attending a training program. All matching contributions must be necessary for the provision of the training, fairly evaluated, and verifiable. Under Section 134(d)(4)(D) of the Workforce Innovation and Opportunity Act, the minimum amount of employer share in the IWT project is dependent on the size of the employer:

- 10% of the cost of training for employers with 50 or fewer employees;
- 25% of the cost of training for employers with 51 to 100 employees; and
- 50% of the cost of training for employers with 100 + employees.

Matching costs must meet the requirements for matching and cost sharing as described in the Office of Management and Budget Uniform Guidance 2 CFR Part 200. For projects involving a group of employers, the percentage of the non-federal share must be determined using one of the methodologies cited in State policy

Costs

Subject to the approval of the Executive Director, in agreement with Programmatic and Fiscal Management, all

reasonable and necessary costs related to the conduct of training are allowable. A maximum of \$12,000 per incumbent worker and/or \$50,000 per employer is set per programmatic year. Funding beyond the \$50,000 cap may be considered in cases where trainings are part of an official apprenticeship program and/or will receive promotion in range and pay. Or local workforce board will approve any projects that exceed \$25,000. There will be no reimbursement until all training programs approved in the initial application are successfully completed and all required documentation is provided by the employer. Should a trainee quit or fail the training program, that trainee's costs will not be reimbursed. Additionally, as limited by State policy, the costs of workers' wages while in training are allowable only as employer match contributions.

The following are typical costs for reimbursement for the WIOA grant.

- Tuition and school fees
- Books
- Training materials and supplies
- Pre- and post-testing
- Vocational counseling
- Vendor/contractor trainer costs
- Travel expenses of trainers beyond normal commute
- Travel expenses of trainees beyond normal commute
- Training facility costs (training off-site)
- Fees for technical or professional certifications
- Refresher courses for occupational certifications
- Wages of internal trainer (taken out of production) for the hours that training was provided

Also, although not prohibited, costs associated with supportive services are discouraged.

Approval

When evaluating project proposals, RITCC will consider the following criteria:

- A. Benefits to workers – The training should result in benefits to workers, including enhanced employability, job upgrades, increased wages, and/or increased job security. Workers completing training should receive some type of written certification or acknowledgment of their successful completion.
- B. Quality of training – The training proposal must be job-specific. The curriculum must be well developed and the instructor must be qualified to conduct the training. The training must also be clearly linked to anticipated increases in productivity.
- C. Previous performance – If the employer has received Incumbent Worker Training grant funding in past years, retention and advancement of previous trainees will be taken into account in the application evaluation process.
- D. Appropriateness of costs – The proposed costs must be judged reasonable in relation to the type of training and the number of workers to be trained. And, all proposed costs must meet local, State and Federal cost related requirements and limitations.
- E. Matching costs – The submission of a complete application. The minimum employer cost participation requirement must be met. Proposals proposing higher levels of employer cost participation will be given a more favorable review on this criterion.
- F. Secondary benefits - Projects that result in “secondary benefits” will be given added consideration. Secondary benefits may include:
 - Facilitation of the development of Registered Apprenticeships
 - Commitments by participating employers to list future job openings with local American Job Centers

- Participation in other WIOA programs (i.e. access to back-fill jobs)
- G. Jobs created or retained – In the case of projects undertaken as part of an economic development incentive package, the project will be evaluated, in part, based on the number of jobs to be created or retained.

Reporting

Organizations receiving incumbent worker training grants must comply with all state planning and reporting requirements, as specified in State policy. Requirements include the submission of an initial project plan.

Required reports include

- A. information about employers and workers participating in the program (Employee Data i.e. SSN, DOB, Highest Education Status)
- B. quarterly narrative reports on project implementation due within 30 days of the end of each quarter (March, June, September, December)
- C. Final report information submitted within 45 days of the end of the project

Assurances

While incumbent worker projects are being provided, all WIOA required services will continue to be provided using adult and dislocated worker formula allocations. RITCC will continue to meet its performance and expenditure benchmarks for adult and dislocated worker formula allocations. These will not be impacted negatively by the provision of incumbent worker training services.

300-5 Individual Employment Plan/Individual Service Strategy Policy

LWA 13 will have an Individual Employment Plan (IEP) and/or Individual Service Strategy completed on all customers enrolled into WIOA funded activities. This plan will include:

1. An Assessment of the Individual
2. A Written Plan for Service
3. A Review of Service as

needed Procedures will include:

1. Prior to enrollment into a funded activity (Registered, Career or Training Services) a customer, with the help of a Career Planner, will begin to formulate a goal for obtaining employment leading to self-sufficiency.
2. A written plan will be reviewed after the customer has completed an appropriate assessment activity.
3. The WIOA Customer Agreement will be signed by staff and the customer on the same date and serve as an agreement for specific actions to be completed in order for the customer to reach his/her employment goal.
4. This IEP will be updated by the customer and staff on a regular basis. Reviews and changes will be documented in the customer's file or the case notes.

300-6 individual Training Accounts – Expenditure Limits Policy

Under Title I of WIOA, training services must be provided in a manner that maximizes informed consumer choice in selecting an eligible provider. The Local Workforce Board, through the American Job Center, must make the Eligible Training Provider List available to staff.

Eligible individuals may select training services from the Eligible Training Provider List, in consultation with a case manager, in order to maximize informed customer choice. The One-Stop delivery system will refer the individual to training and coordinate payment with the eligible training provider through an Individual Training Account (ITA). The ITA is a payment agreement established on behalf of a participant with a training provider. Only those training providers that are on the State's ETPL, and are approved for use of WIOA funding, and are able to redeem ITA's for payment. In order to enhance individual participant choice in their education and training plans and provide flexibility to service providers, the U.S. Department of Labor (USDOL) allows ITA's for out-of-school youth, ages 16 to 24, using WIOA youth program funds when appropriate.

ITA's Cost Limits – The American Job Center has established a two-tier cost system for ITA's. Healthcare and Heavy Equipment Operator programs have a limit of \$15,000 per program year. All other approvable training programs have a \$10,000 per program year limit.

300-7 Work-Based Training Policy

Work Based Training's Cost Limits – The American Job Center has established a limit of \$15,000 per program year.

Under WIOA, there are additional work-based training options and flexibilities for adults and dislocated workers. This section covers allowed types of work-based training including: On-The-Job training (OJT), work experiences and customized training. Sections 20 CFR 680.700 through .840 govern Work-Based Training.

On-the-Job Training

OJT provides reimbursements to employers to help compensate for the costs associated with skills upgrade training for newly hired employees and the lost production of current employees providing the training (including management staff). OJT training can assist employers who are looking to expand their businesses and who need additional staff trained with specialized skills. OJT employers may receive up to 50% reimbursement of the wage rate (in certain circumstances up to 75%) of OJT trainees to help defray personnel training costs.

1. OJT programs must provide potential new employees or eligible *Underemployed* workers with the opportunity to acquire new skills.
2. Rock Island Tri-County may approve the purchase of items required for the OJT training such as tools, equipment and uniforms.

300-7 Work-Based Training Policy (Cont'd)

3. The *Participant* must be an employee during the OJT contract period and the employer must agree to the contract prior to the person's start date.
4. Employment will continue upon successful *Completion* of training. Successful completion includes: Acquired the skills identified for the training program and met the goals of the Individual Employment Plan (IEP).
5. The intent of an OJT is full-time paid employment that leads to *Self-sufficiency* according to the most current *Lower Living Standard Income Level* or at or above the self-sufficiency level established by the LWIB standard.
6. Consideration may be given to an OJT *Placement* that is less than full-time if an individual is receiving a service other than education or training and has one or more of the following *Barriers to Employment*: *Adult* or youth with a disability, an *ex-Offender*, a youth aging out of foster care, eligible migrant and seasonal farmworkers, an individual who is homeless, or an *English Language Learner*, who has low *Literacy* levels and faces substantial cultural barriers.
7. Employers may not hire OJT employees as independent contractors.
8. Employers are ineligible for an OJT contract if they have previously exhibited a pattern of failing to provide OJT participants with continued long-term employment with wages, benefits and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work.
9. Training does not have to occur at the employer's location.
10. OJT providers are *not* subject to the eligibility requirements for *WIOA* training providers.
11. Although these providers are not included in the State *Eligible Training Provider List (ETPL)*, they are considered to be eligible providers of *Training Services*.
12. LWIBs may combine OJTs with other forms of training. As part of a participant's *ISTEP*, OJT may combine other types of training such as *Work Experience*, classroom, and remediation. Training is paid for using an *Individual Training Account (ITA)*. When combining OJT with other types of training such as those above, only the OJT hours are eligible for wage reimbursement.
13. OJT participants are not eligible to receive Needs Related Payments (NRPs).
14. OJT participants cannot be immediate *Family* members of the business owner or direct supervisor. The term "immediate family" includes a spouse, child, son-in-law, daughter-in-law, parent, mother-in-law, father-in-law, sibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, and grandchild.

300-7 Work Based Training Policy (Cont'd)

Customized Training

Customized training is designed to meet the specific requirements of an employer or group of employers with the commitment that the employer(s) hire an individual upon successful completion of the training. The Final Rules provide LWIBs with flexibility to ensure that customized training meets the unique needs of the job seekers and employer(s). The employer must pay for a significant portion of the cost of training, as determined by the LWIB. LWIBs must identify policies for determining what constitutes employer's payment of "a significant portion of the cost of training" taking into account: the size of the employer and other factors the LWIB determines are appropriate, which may include, the number of employees participating in training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities.

Work Experiences

A work experience or internship is a planned, structured learning experience that takes place in a workplace for up to six months. Work experiences or internships may be paid or unpaid, as appropriate, and consistent with other laws, such as the Fair Labor Standards Act. A work experience or internship may be arranged within the private for-profit sector, the non-profit sector, or the public sector.

Participants in a paid work experience must be provided a Reasonable Wage to the extent that it is consistent with that paid for similar work according to the Uniform Guidance at 2 CFR 200. Reasonableness of compensation is addressed at 2 CFR 200.430(b).

Work site contracts can be negotiated and extend for up to a fiscal year. Prior to the initiation of a work experience training on-site visits and supervisor orientations will occur requiring attestation by Career Planner and work site supervisor.

300-8 Youth Eligibility - Incentive Payments Policy

20 CFR 681.640 states that Incentive payments to youth participants are permitted for recognition and achievement directly tied to training activities and work experiences. Local programs must have written policies and procedures governing the award of incentives and must ensure that such incentive payments are tied to the goals of the specific program; outlined in writing before the commencement of the program that may provide incentive payments. Incentives must be in compliance with the Cost Principles in 2 CFR part 200.

300-8 Youth Eligibility - Incentive Payments Policy (Cont'd)

Services that are eligible for incentive payments include, but not limited to, GED testing, Attendance, Improvements in Assessment scoring, employability skills, workshops and field trips, and PowerPointAward presentations.

Incentives provide a means to recognize and reward an active youth's success while participating in WIOA youth services. Youth funds may be used to provide incentives for recognition and achievement to eligible youth provided it is made a part of the participant's individualized assessment and service strategy. Incentives can be in the form of gift cards and/or checks payable to the youth when it is deemed appropriate.

Incentives may be provided to youth enrolled or in active follow-up services. Incentives during follow-up may assist with completion towards program goals. Achievements completed prior to WIOA enrollment do not qualify for incentives.

Incentives may not include entertainment, such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment (per 2CFR part 200).

300-9 Pell Refund Policy

Participants enrolled in training services and eligible for a Pell grant can be refunded from the training provider if their approved WIOA funding pays for their approved training in its entirety.

400-1 Supportive Services Policy

Supportive services may be made available to any adult, dislocated worker or youth participating in title I career services or training activities that is unable to obtain supportive services through other programs providing such services. Additionally, the supportive services must be necessary to enable the individual to participate in career services or training activities.

400-1 Supportive Services Policy (Cont'd)

Supportive services may include, but are not limited to:

1. Assistance with transportation; distance of 30 miles or more round trip will be paid out at one half the current federal mileage rate.
2. Assistance with child care and dependent care; case by case basis only.
3. Linkages to community services;
4. Assistance with educational testing;
5. Reasonable accommodations for individuals with disabilities;
6. Assistance with health care;
7. Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eye glasses and protective eye gear;
8. Assistance with books, fees, school supplies, and other necessary items for students enrolled in post-secondary education classes and;
9. Payments and fees for employment and training-related applications, test, and certifications.

400-2 Supportive Services with the Trade Adjustment Assistance Policy (TAA) Policy or other Special Grants

The WIOA Dislocated Worker program partners with TAA in identifying and serving trade-impacted workers. American Job Centers can provide supportive services relating to child care, transportation, dependent care, housing assistance, and needs-related payments, and may also provide career services described in Section 4 of TEGL 3-15.

Pre-Apprenticeship and/or Registered Apprenticeship programs facilitate access to appropriate supportive services during a client's participation in services. These supportive services are to assist the participant to qualify for and maintain participation in the Pre-Apprenticeship and/or Registered Apprenticeship program, as well as gaining employment. Supportive services may include, but are not limited to counseling, transportation assistance, childcare, rehabilitative services, uniforms, equipment/tools and healthcare.

400-3 Needs Related Payments Policy

Needs-related payments are designed to provide a participant with financial assistance for the purpose of enabling them to participate in training services. ETA recognizes that many individuals in need of training services may not have the resources available to participate in the training. Needs-related payments can help individuals meet their non-training expenses and help them to complete training successfully. The maximum level of needs-related payments must be established by the LWIB and must follow criteria at 20 CFR 680.970.

400-3 Needs Related Payments Policy (Cont'd)

According to sec. 134(d)(3)(B) of WIOA, a participant must be enrolled in a training program described in sec.134(c)(3) of WIOA in order to receive needs-related payments. Specific criteria for Adult and Dislocated Worker eligibility may be found in 20 CFR 680.940 and 680.950.

Levels of Payments

Adult – In accordance to DCEO, the payment level for adults will be established by the LWIB on a case by case basis.

Dislocated Workers - For dislocated workers, payments must not exceed the greater of either of the following levels:

The applicable weekly level of the unemployment compensation benefit, for participants who were eligible for unemployment compensation as a result of the qualifying dislocation; or

The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation as a result of the qualifying layoff. The weekly payment level must be adjusted to reflect changes in total family income, as determined by LWIB policies.

400-4 Self-Sufficiency Policy

Self-sufficiency is evaluated in the determination for the receipt of Training Services. For RITCC Dislocated Workers, self-sufficiency is defined as 90% of a client's wage at dislocation. Adult self-sufficiency is defined as employment that pays at least the lower living standard income level (LLSIL) as defined in Section 101(24) of the statute.

500-1 General Follow-Up Policy

States and local areas must provide follow-up services for adults and dislocated worker participants who are placed in unsubsidized employment, for no less than 12 months after exit, monthly for the first quarter and at a frequency of no less than once per quarter thereafter.

Types of follow-up service are not limited to but can include:

1. Individual counseling on workplace
2. Soft skills development
3. Assistance with updating documents including resume, cover letters, thank you letters and etc.
4. Job searching and applications

500-1 General Follow-Up Policy (Cont'd)

5. Counseling on additional training for upward mobility in employment
6. Directives to services the participant needs

Follow-up services do not extend the date of exit in performance reporting; for more information on performance reporting see TEGL 10-16.

All follow-up services must be recorded in the IWDS system in an appropriate manner.

500-2 Follow-Up Youth Policy

Follow-up services begin immediately upon exit. Follow-up services for youth may include the following:

1. Supportive services;
2. Adult mentoring;
3. Financial literacy education;
4. Labor market and employment information about industries and career exploration; or
5. Activities that assist the youth in preparing for post-secondary education.

20 CFR 681.580 states that all youth participants must be offered the opportunity to receive follow-up services that align with their individual service strategies. Follow-up services must be provided on a monthly basis, for a minimum of 12 months unless the client declines the follow-up services.

Youth must be notified of the follow-up services at the time of enrollment. The youth client can opt out of follow-up services at any time during that 12 months. If the youth client opts out of the services, it must be documented in the file.

All follow-up services must be recorded in the IWDS system in an appropriate manner.