

WIA TITLE I-B AND ARRA PROGRAM MANAGEMENT POLICIES AND PROCEDURES

MEMORANDUM #08-10

To: All WIA Title I-B and ARRA Youth Program Subrecipients

Subject: Summer Youth Employment Program

Effective Date: February 17, 2009

Please refer to this Summer Youth Employment Program policy when dealing with all matters of the American Recovery and Reinvestment Act (ARRA) Summer Youth Employment Program. Do not rely on Workforce Investment Act (WIA) Youth Policy except as specifically referenced herein, as many conditions differ.

SPECIAL CONDITIONS:

At a minimum, 30 percent of the full funding under this program shall be used to provide youth activities to out-of-school youth, as required by law.

Funding provided under this grant agreement may **not** be used to provide Individual Training Accounts to any youth. Youth who are 18-24 years of age may be co-registered or separately registered in the WIA Title I-B Adult or Dislocated Worker program as eligible.

ARRA funds must be used to create summer employment opportunities to youth ages 14 through 24 years from May 1, 2009 to September 30, 2009. Work Readiness is the only performance indicator to summer jobs as a measure.

PARTICIPANT RECORDS:

Summer Youth Employment Program participant records must be created and maintained in accordance with ARRA, state, and local guidelines. All participant records and Work Readiness (summer youth only May 1, 2009-September 30, 2009) must be entered into SKIES.

OBJECTIVE ASSESSMENT AND INDIVIDUAL SERVICE STRATEGY DEVELOPMENT:

It is the policy of Workforce Development Council Snohomish County (WDCSC) that each subrecipient receiving ARRA Summer Youth Employment Program funds develop a thorough system for conducting intake, assessment, and plan development for each youth found eligible for youth program services as described in **WIA Title I-B Youth Program Management Policies and Procedures** Memorandum #__-01, Eligibility/Selection Criteria.

This system must include the completion of and maintenance of an Initial Objective Assessment utilizing the form provided by WDCSC, and a Individual Service Strategy utilizing the form provided by WDCSC.

PROCEDURES:

The Initial Objective Assessment and Individual Service Strategy must be included in the intake packet as part of the youth registration process. Copies must also be retained in the individual participant file maintained by the subrecipient. The subrecipient is responsible for ensuring that direct service delivery staff conduct ongoing reviews of Initial Objective Assessment and Individual Service Strategies, making updates as appropriate.

SELECTION CRITERIA

Consistent with ARRA, the Washington State Strategic and Operations Plans for workforce development, and the WDCSC Strategic and Operations Plans, it is the policy of WDCSC that every youth who receives ARRA Summer Youth Employment Program funded services must be eligible for and registered to receive those services.

Program registration is the process for collecting information for supporting a determination of eligibility for a specific program. This information may be collected through methods that include electronic data transfer, personal interview, or other means as summarized on an individual's WIA Registration Form. Registration shall be documented in individual participant files and in the Washington State Management Information System (MIS), known as Services, Knowledge and Information Exchange System (SKIES), for WIA Title I-B and ARRA Programs.

Further, it is the policy of WDCSC that, in the event that there are more youth eligible for services than there are funds to serve, there are two criteria which are to be taken into consideration in selection of youth: (1) a youth's membership in a contractually designated target population and (2) a youth's relative need for service. Each subrecipient should have mechanisms in place to ensure that youth who are members of contractually designated target populations have access to program services relative to the incidence of members of that target population in the ARRA Summer Youth Employment Program-eligible population. Each subrecipient should also have

mechanisms in place to ensure that youth who have relatively greater need for program services are registered for and receive services before youth who have relatively less need.

REGISTRATION POLICY

ARRA Summer Youth Employment Program registration occurs at the point where there is significant staff involvement. Significant staff involvement occurs at the point where:

1. An Initial Objective Assessment and Individual Service Strategy have been completed,
2. a planned intervention of ARRA services occurs,
3. an Objective Assessment and an Individual Service Strategy (ISS) are initiated which identify the need for ARRA dollars for implementation, and
4. A WIA Registration Form and supporting documentation consistent with this policy have been completed and collected and the individual determined eligible for ARRA Summer Youth Employment Program services.

Each of these conditions must be met before an individual may be registered and before any services other than self-service or informational services may be provided.

Equal Employment Opportunity data must be collected on each individual during the registration process as documented on the WIA Registration Form. These forms must be retained for individuals who are not registered under a WIA I-B and/or ARRA program as well as for individuals who are. If, for any reason, a WIA Registration Form which is started is not completed, there must be an accompanying Record of Actions Taken to Correct Registration Deficiencies in the applicant's file.

ELIGIBILITY CRITERIA

To be eligible for ARRA Summer Youth Employment Program services, an applicant must be:

1. age 14 through 24 years of age, and
2. a United States citizen or non-citizen who is authorized by the Immigration and Naturalization Service, and
3. in compliance with the Selective Service Act, and
4. low-income (as defined below) with one or more of the characteristics listed below, or
5. a youth with one or more of the characteristics listed below.

No more than 5% of youth registered may be youth who meet criteria a., b., c. and e. and at least 95% of youth registered must be youth who meet criteria a., b., c., and d.

The characteristics which apply to both d. and e. above are as follows:

1. basic skills deficient,
2. offender,
3. involved in the juvenile justice system,
4. school drop out,
5. pregnant or parenting,
6. homeless or runaway,
7. foster child on who's behalf state or local government payments are being made,
8. having one or more disabilities including learning disabilities,
9. personal/family substance abuse,
10. gang involved/affiliated/affected,
11. enrolled in an alternative education program,
12. at-risk of dropping out of school,
13. lacking affordable housing,
14. victim of domestic violence/sexual or child abuse,
15. identified social adjustment or mental health issue(s),
16. lacking a significant or positive work history,
17. migrant family member,
18. not at grade parity.

DEFINITIONS

The definitions of the above terms are provided in the current edition of the Workforce Investment Act Forms Manual.

REGISTRATION SYSTEM

Consistent with the Workforce Investment Act, the registration system will include:

1. The use of the WIA Registration Form to generate all information necessary to determine eligibility and meet reporting requirements; and
2. The applicant signature and date, as well as the signature and date of the applicant's parent, guardian, or responsible adult in instances where the applicant is under the age of 18, on the WIA Registration Form attesting that the information on the form is true to the best of the applicant's and adult's, if applicable, knowledge; and
3. The subrecipient representative signature and date on the form; and
4. The maintenance of adequate documentation to ensure the credibility of the eligibility determination, which shall at a minimum consist of:

- i. A completed WIA Registration Form for each applicant; and
 - ii. Copies of documents used to determine and verify eligibility.
5. Verification of the information provided on the WIA Registration Form shall be maintained as part of each applicant's/registrant's file; and
6. Completed Work Readiness Assessment.

Each criterion used to establish eligibility must be supported by a verifying document. This list is not intended to exclude other forms of reasonable verification which the applicant can provide as determined by the subrecipient and approved by WDCSC.

WORK READINESS

The contractor is responsible for conducting a pre work readiness evaluation for each participant. The contractor must also ensure a post-work readiness evaluation is completed by the employer.

SUBRECIPIENT ROLE

It is the subrecipient's responsibility to review and approve all registration paperwork for completeness, accuracy, and internal consistency prior to an applicant's registration. It is also the subrecipient's responsibility to identify all applicants to be registered under the 5% "window" category **prior to registration**. The subrecipient is further responsible for entering the appropriate data for tracking client registration and eligibility information into SKIES using established protocols. The subrecipient must maintain a centrally controlled file for each program applicant and registrant which contains copies of all documents collected and provide any and all Federal, State, County, and WDCSC monitors and auditors with access to such records given reasonable notice.

As noted above, the subrecipient is to maintain separate files for applicant paperwork begun, but never completed, which does not result in a client registration into the system. Additionally, the subrecipient is responsible for assuring additional confidentiality of files for applicants and registrants who do not sign the Consent Form documenting approval of data sharing and consistent with GENERAL PROGRAM Management Policies and Procedures Memorandum #__-12, Data and Information Collection and Maintenance.

INCOME GUIDELINES

Consistent with ARRA, the Washington State Strategic and Operations Plans for workforce development, and the WDCSC Strategic and Operations Plans, the following Income Guidelines are to be used in determining if a given youth is low-income based

on family income relative to family size for Program Years 2008 and 2009 starting on March 26, 2009. Consistent with State policy, these guidelines are those established for the Seattle-Tacoma-Bremerton Metropolitan Statistical Area.

**Program Years 2008 and
2009 Income Guidelines
INCOME GUIDELINES**

Family Size	Amounts
1	\$10,830
2	\$16,613
3	\$22,809
4	\$28,155
5	\$33,226
6	\$38,856

MIS PROCEDUES

Consistent with ARRA, the Washington State Strategic and Operations Plans for workforce development, and the WDCSC Strategic and Operations Plans, it is the policy of WDCSC to collect and aggregate the information necessary to document and verify registrant eligibility for program services, services received, and outcomes attained through the Washington State Management Information System (MIS) for WIA Title I-B and ARRA Programs.

Procedures

1. General MIS Procedures:

All forms must be fully completed on computer or in ink. All signatures must be in ink.

No white-out may be used on forms. All changes must be made by drawing a line through the item to be changed and initialing and dating the item in ink.

Subrecipients will submit original forms and photocopies of supporting documentation to WDCSC for review, data entry into SKIES, and monitoring/audit file maintenance. Photocopies of all documents submitted are to be maintained in working files by each Subrecipient.

Photocopies of any documents which are changed by WDCSC will be returned to the initiating Subrecipient for inclusion in its working files.

MIS documents are to be submitted to WDCSC no later than the 26th day of the month for inclusion on monthly reports generated for Youth Council review.

2. Additional Eligibility Determination and Initial Assessment Procedures :

Subrecipients are responsible for conducting a review of all registration packages and completing the WIA 30 Day Review and Enrollment Packet Checklist . The review must be completed and signed within 30 days of the applicant's registration date.

Currently, this Workforce Development Area does not accept applicants with Pseudo Social Security Numbers as registrants. Services may be provided to secure Social Security Cards for applicants.

Subrecipients are responsible for maintaining their own applicant waiting lists. If sixty (60) days elapse between application date and the date of registration, a new set of registration forms must be completed or the original forms updated, resigned, and redated. The registration packet must be retained by the subrecipient for any individual who is determined eligible for WIA Title I-B and/or ARRA services and who not registered or recertified within 60 days with the reason for non-registration or recertification recorded on the Record of Actions Taken to Correct Registration Deficiencies form.

Form Completion Instructions

Instructions for completing forms are contained in the Workforce Investment Act Forms Manual.

INCENTIVE AWARDS

Consistent with ARRA, the Washington State Strategic and Operations Plans for workforce development, and the WDCSC Strategic and Operations Plans, it is the policy of WDCSC that a given subrecipient may elect to provide youth registered in ARRA funded services with an opportunity to receive incentive awards to provide motivation for the attainment of DOL recognized skills and other measurable objectives. Should a subrecipient elect to provide incentive awards to the participants it registers under the ARRA Summer Youth Employment Program, the subrecipient must have procedures in place to ensure that such awards are made based on equitable determination of eligibility and provision of payments to all participants based on (1) performance and (2) attendance. Such incentive awards may be in the form of cash or non-monetary goods or services.

To that end, each subrecipient must have written internal eligibility determination and payment procedures that describe minimum measures of performance and attendance requirements. Procedures must also define the frequency and amount of payments and steps to assure that payments are available to any participant eligible for an incentive award based on such procedures. Eligibility for and receipt of such payment must be maintained by the subrecipient in the participant's file and its fiscal records.

1. Eligibility Criteria

a. Eligible Activities: Only participants enrolled in the Summer Youth Employment Program activities for which time and attendance records are maintained are eligible for incentive awards.

b. Behavior Standards: Only participants who attain both of the following standards are eligible for incentive awards.

Performance: Satisfactory performance is defined as attainment of a DOL recognized skill or other measurable objective as documented through an appropriate evaluative process.

Attendance: Satisfactory attendance shall be at 90% or better for scheduled activities.

2. Maximum Amount/Value

Whether in the form of cash or a non-monetary good or service, the maximum amount/value of an incentive award to a given youth may not exceed \$200 in any given calendar year with the exception of Drivers Education classes. Should a participant be given a Drivers Education class voucher the total value of support services awarded to a given youth may not exceed \$700.

Procedures

Any subrecipient electing to provide incentive awards must document the participant's eligibility for and receipt of payment in the participant file utilizing the Incentive Documentation Form.

SUPPORTIVE SERVICES

The term "supportive service(s)" means a service or services which are necessary to enable an individual who cannot pay for such service or services to participate in the Summer Youth Employment Program under ARRA. Supportive services are intended to be one-time or time limited services and do not include the acquisition, improvement, or retention of personal assets (e.g., automobiles or homes). Supportive services may be provided to a participant during program registration and during the 12 month follow-up period after exit. Supportive service obligations and expenditures are to be tracked separately and are subject to the additional policies below.

It is the policy of WDCSC that a subrecipient may elect to provide supportive services to a given youth from the point of registration through the 12 month follow up period to remove barriers to participation in program activities designed to result in the attainment of DOL recognized skills and other measurable objectives.

Supportive services must be necessary for a given participant consistent with her/his Objective Assessment and Individual Service Strategy and be beyond her/his ability to

pay. Supportive services are not entitlements and shall be approved by the subrecipient for a given participant on the basis of documented financial assessment, individual circumstances, the absence of other resources, and funding limits.

Such supportive services may only be provided in the form of non-monetary goods or services procured from a vendor and reimbursements shall be for actual, documented costs.

Each subrecipient must have written internal eligibility determination and payment procedures that describe the method for documenting need and the absence of such services through non-ARRA resources. Procedures must also define the frequency and amount of payments and steps to assure that supportive services are available to all participants equitably provided they are eligible for such services based on the procedures established. Eligibility for and receipt of supportive services must be maintained by the subrecipient in the participant's file. Payment records must also be maintained in the subrecipient's fiscal records.

POLICIES FOR THE PROVISION OF SPECIFIC SUPPORTIVE SERVICES

1. Child/Dependent Care

Child/dependent care may be provided to a participant's child or parent while the participant is engaged in training or employment consistent with her/his Individual Service Strategy including transportation time. Priority will be given to single heads of household. Reimbursement will not be made for such care if the participant has an unemployed spouse at home. The participant must be the custodial parent or guardian of the child/dependent for who such services are required. Child/dependent care services shall be paid to a licensed vendor unless the vendor is providing services in the participant's home. Exceptions can be made if it is clearly demonstrated that such care is not readily available due to the child's/parent's age or special needs or in instances when there is no appropriate care available in the area. Such exceptions are intended as a temporary measure to allow the participant to engage in program activities until acceptable care can be found. The payment shall be based upon actual costs while the participant is participating in and traveling to or from approved activities, as documented in attendance records, at rates which are not greater than current DSHS reimbursement rates. In instances where an hourly rate is being paid, the amount paid is not to exceed the maximum daily rate.

2. Transportation

Assistance may include bus tokens/passes, van pool expenses, ferry costs, or other public travel assistance determined reasonable and necessary for a given participant to participate in the Summer Youth Employment Program.

In instances where public transportation is not available or not feasible, assistance may be provided in the form of gas vouchers and/or car repairs when a private vehicle is

used as the primary source of transportation to summer youth employment program activities.

If the repair of an existing vehicle addresses a significant barrier to training and/or employment, and such assistance will alleviate the barrier, then such assistance may be granted. To provide gas vouchers or pay for repair, the following conditions must be met. The participant must:

- have a current Washington State Driver's License,
- have valid insurance, and
- be the registered owner of the vehicle involved.

If the participant is a youth under the age of 18 and not the registered owner of the vehicle, the subrecipient must obtain documentation identifying the vehicle's registered owner and providing reasonable assurance that the vehicle will be available to the participant for the intended purpose if repaired.

Car insurance is limited to a one-time only payment for a one month period and when all conditions in this section apply.

3. Medical, Dental, and Counseling Expenses

Consistent DOL Training and Employment Guidance Letter 3-04 and findings from DOL's Young Offender Demonstration Grant programs that the provision of necessary medical and counseling expenses improves participant outcomes, assistance for medical and dental services not covered by other insurance policies or by state labor and industries is allowed. Professional counseling may also be provided to a participant under comprehensive guidance and counseling [see §664.410(10)], one of the "10 elements" of the ARRA Summer Youth Employment Program, to address legal, financial, and mental health, and other personal needs as well as outpatient treatment for substance abuse. Standard fees charged for medical records and reports are also allowable.

4. Clothing

Work clothing including uniforms required by employers to participate in the summer youth employment program may be purchased.

5. Emergency Services

Housing

Rental payments may be paid to a participant's landlord for one month when such payment is needed to prevent homelessness. Payment may not include late fees. Such housing assistance is intended as a temporary, one-time measure. In the case of shelter for a participant who is homeless, up to two months' rent may be paid if required

by the landlord to secure housing. In instances when housing assistance is provided, there must be a reasonable expectation that the assistance will resolve the situation; for example, if rent is paid for one month, there must be a reasonable expectation that the participant will obtain the resources to pay rent for the following months.

Other Emergency Services

Other emergency services include payments for overdue electric, home heating fuel, and water bills; telecommunication costs; food; and/or payment for temporary shelter.

In instances where an overdue electric, home heating fuel, and/or water bill is being paid, it must be documented that the participant has contacted the local Low-Income Home Energy Assistance Program (LIHEAP) energy assistance provider and found eligible for services but unable to receive services due to a lack of program funds.

Telecommunication costs are subject to the following restrictions.

- It must be documented in the participant file that Community Voice Mail was explored as an option that has proven infeasible along with the reason.
- If supportive services are used for a cellular telephone, it must be documented in the participant file that this is the participant's only means of telecommunication. In such instances, only base costs may be paid.
- No internet costs may be paid.

Each emergency situation must be evaluated on an individual basis and shall include an evaluation of alternative resources such as food bank services. In instances when other emergency services are provided, such assistance must be to address a non-reoccurring emergency or there must be a reasonable expectation that the assistance will resolve the situation for the foreseeable future.

6. Certification, Screening and Testing

Union initiation; employment-related fees including but not limited to testing fees, drug screening, background checks; food handlers permits, Washington State Drivers Licenses and Identification Cards, security clearance, first aide/CPR certification, or finger printing; commercial and business licenses; and/or other fees if required by law and/or not paid for by employer to accept or maintain participation in the summer youth employment program. Union dues are only paid for the first month of employment: additional months require an exception for approval.

7. Events/Activities

The cost of goods and services related to participation in scheduled events and/or activities related to the summer youth employment program are allowed and includes

entry fees, transportation, meals, and other travel expenses associated with field trips, group meetings, and other activities which enhance participants' basic (academic); team building, leadership, citizenship, other work readiness; and/or occupational skills. Transportation and other related fees shall be reimbursed at or below the rate established for staff travel by the subrecipient.

8. Food

In non-emergent situations, a participant may receive supportive services to meet nutritional needs when it is documented that the participant's schedule does not allow for meals between scheduled Summer Youth Employment Program activities.

9. Safety Gear/Tools/Books/Supplies/Equipment

Boots, helmets, gloves, safety vests, eye protection, other safety gear required by OSHA/WISHA standards, and tools required for participation in the summer youth employment program are allowed. Participants may receive assistance for the purchase of tools, books, supplies, and equipment related to training or necessary for accepting an employment offer. A given tool or piece of equipment may only be purchased once.

The need for any supportive service must be documented on the participant's Individual Service Strategy and in case notes as must all efforts to obtain the needed services from a non-ARRA source.

10. Summer School/GED testing

The costs of summer school and or GED testing are allowed.

Additional Limitations

The maximum amount that may be spent on any one participant in a given program year is \$1,000.

Supportive services may not be used to pay for the purchase, improvement, or maintenance of any asset (e.g. car payments or mortgage payments); to pay taxes; to pay past due fees, penalties, interest or other such expenses; to pay child support payments in arrears or otherwise; to pay for parking or moving violation tickets; to pay for bail or restitution; to settle an insurance claim; or to pay for consumer debt. Computer hardware and software are considered assets.

Request for Exception

In exceptional circumstances, a request for exception to the above policies must be made to WDCSC in writing prior to issuance of the service for which exception is being requested.

PROCEDURES

Any subrecipient electing to provide supportive services must document the participant's eligibility for and receipt of such service in the participant file and the subrecipient's fiscal system using the Supportive Services Request. Additional supporting documentation must also be maintained in specific instances as described above. Supportive services payments are to be made by the subrecipient directly to a vendor for such services. In extraordinary circumstances, payment may be made directly to the participant with prior written approval from WDCSC, documentation of which is to be retained in the participant and fiscal files as is documentation of any approved exception.

YOUTH WORK EXPERIENCES

Compensation

In conformance with the Fair Labor Standards Act, a participant shall be enrolled in a paid work experience when s/he is performing work which contributes to the productivity of the agency or business hosting the work experience. In such instances, the participant shall be paid an hourly wage at the same rates as similarly situated employees or trainees, but not less than the higher of the minimum wage prescribed under federal and state minimum wage laws.

Participants enrolled in one of the following classroom training activities, combined with a paid work experience, may receive the hourly work experience wages for such participation, provided the scheduled paid work experience time is more than 50% of the combined activities.

Work Experience Agreement

All work experiences must be documented on a given participant's Individual Service Strategy and in case notes. Additionally, a WorkSource Snohomish County Work Experience Agreement must be completed prior to the start of the work experience for any paid work experience and for any unpaid work experience of greater than eight hours in duration.

A single Work Experience Agreement may be written for group training with a single training site provided the working conditions, job description, training plan, wage rates, and term of the Agreement are the same for all participants covered by the Agreement.

Work Experience Placement Checklist

WDCSC considers participant safety on the worksite to be of paramount importance. Therefore, a WorkSource Snohomish County Work Experience Placement Checklist, provided in must be completed for every work experience to document the site's

compliance with all relevant OSHA/WISHA requirements prior to the start of the work experience.

Supervisor and Participant Handbooks

In every instance where a Work Experience Agreement is developed, the host site supervisor must be given a Supervisor Handbook and the participant must be given a Participant Handbook, to be developed by the subrecipient and approved by WDCSC, that describes fair labor laws, minor work laws, WDCSC's complaint and grievance process, the process for documenting time and attendance and receiving payment, if applicable, and other relevant information.

Additional Subrecipient Responsibilities

It is the responsibility of the subrecipient to review and approve all Work Experience Agreements within established policies; to maintain a system of obligating and reobligating funds for paid work experiences; to maintain a time and attendance and wage payment system; to maintain a system for providing work experience participants with benefits which shall, at a minimum, include FICA and workers' compensation; to track all work experience wages and benefits expenditures by participant; and maintain documentation of eligibility for participation in a work experience. The Work Experience Agreement and associated documents, including time and attendance records, wage and benefit payment information, and all progress reports for a given participant are to be maintained in the participant file and subrecipient's fiscal system.

Procedures

The WorkSource Snohomish County Work Experience Agreement and Work Experience Placement Checklist are to be used to establish work experience assignments as described above. The Agreement format may be revised by the subrecipient with prior approval by WDCSC. A draft Supervisor Handbook and Participant Handbook are to be provided to WDCSC for approval prior to dissemination to work experience host sites and participants.