

## INTERNAL POLICY DOCUMENT

<b>Subject:</b> RAPID RESPONSE POLICY	<b>Policy No:</b> CA 2012-002
<b>Federal or State Policy:</b> <ul style="list-style-type: none"> <li><a href="#">Workforce Innovation and Opportunity Act (WIOA) of 2014:</a></li> <li><a href="#">WIOA Final Rule, 20 CFR Part 603, 651, 652, et al;</a></li> <li><a href="#">WARN Act of 1998 WDA PI 12-23</a></li> </ul>	<b>Effective Date:</b> December 14, 2016
	<b>Expiration:</b>  Continuing

### SCOPE OR PURPOSE

To establish Detroit Employment Solutions Corporation's (DESC's) policy and procedures for the implementation of Rapid Response Services to help laid-off workers quickly transition to new employment. Rapid Response acts as both a provider of direct re-employment services and as a facilitator of additional services and resources. Rapid Response is a primary gateway to the workforce system for both dislocated workers and employers and is a component of a ***demand driven system***.

### BACKGROUND

The WIOA holds States responsible for the provision of Rapid Response services. The Michigan Talent Investment Agency (TIA) maintains responsibility for ensuring compliance with federal and state requirements, as such, the TIA WIOA Section will remain the State's designated recipient of WARNs to fulfill its statutory requirements. However, it is the expectation that the TIA and MWA's, along with other key partners, will act in rapid response coordination during all layoffs in a particular region regardless of the size of the event.

### POLICY

When rapid response services are required, DESC will work and coordinate with the TIA WIOA section to ensure that the implementation of program initiatives, support guidance, technical services and financial resources are provided to our local service delivery area.

DESC is taking a comprehensive approach to planning, identifying, and responding to layoffs, and preventing or minimizing their impacts whenever possible. To ensure high quality and maximum effectiveness, DESC with its One-Stop staff take appropriate steps to ensure that all rapid response stakeholders are included in each step of the rapid response process. A rapid response

process is most effective when the partners that administer and deliver services are guided by procedures that are clearly defined. As a result of the uniqueness of each event and the necessity of DESC to sustain established relationships, we recognize that flexibility is the key.

## **PROCEDURE**

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### **1. Notification of Lay Off Aversion WARN Assistance (Rapid Response):**

If the **TIA WIOA staff** is in receipt of a WARN and/or receives a notice of a massive layoff or plant closing via the Unemployment Insurance Agency (UIA), Union Official, Company, the Michigan Economic Development Corporation, or employee TIA WIOA staff shall contact the designated DESC/DCC Rapid Response staff, making them aware of the notification and what information has been obtained thus far, including, but not limited to the following information:

- A. Company Name (including address and telephone number)
- B. Company Contact Name and Title
  - Description of the business, including the North American Industry Classification System (NAICS) code
- C. Type of dislocation (Mass Layoff or Plant Closure)
- D. Notification type (WARN, News Article, Letter, Phone Call, or Other)
- E. Number of impacted workers and total workers at the facility
  - Brief description of impacted employee skill sets and corresponding occupations that can be linked to a Standardized Occupational Classification code.
- F. Identification of potential days and times for a Rapid Response Meeting and/or Worker Orientation.

If **DESC** is in receipt of a WARN regarding a dislocation via Union Official, Company, the Local Economic Development Corporation, local newspaper, or employee; they shall contact the designated **TIA WIOA staff** and make them aware of the notification and what information has been obtained thus far, including, but not limited to, above items A through F.

- 2. Upon exchange of the aforementioned information**, DESC Rapid Response staff and TIA Rapid Response staff will mutually decide who will take the lead in contacting the employer. The lead agency will be responsible for timely dissemination of information to the other partners and key stakeholders to ensure accurate and up-to-date information is available and communicated.
- 3. DESC's One-Stop staff** will make initial contact with a company official obtaining the additional information about the dislocation event, as well as two preferable dates for a Rapid Response meeting and/or a Worker Orientation. Within 24 to 48 hours, DESC will contact the **TIA WIOA Rapid Response staff** and other key

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stakeholders to confirm the Rapid Response Meeting date and to share information about the event. If employees are covered by a collective bargaining agreement, the local union officials will also be contacted by DESC's One-Stop staff regarding the labor unions' participation in the Rapid Response Meeting and/or Worker Orientation. The **TIA WIOA Rapid Response staff** will remain responsible for arranging UIA representation at the Rapid Response Meeting and Worker Orientation. If UIA staff are not physically able to participate, the TIA will try to make arrangements for their participation via a webinar, conference call or other technological means. If UIA staff is unable to participate, DESC's One-Stop staff should direct Rapid Response and Worker Orientation participants to UIA's website, including the online claim filing kit (UIA Form 1251) and the online service Claimant Web Account Manager.

4. **TIA as Lead Staff.** With the designated TIA Rapid Response staff as the lead contact, they will make initial contact with a company official, obtain additional information about the dislocation event, as well as two preferable dates for a Rapid Response meeting and/or a Worker Orientation. Within 24 to 48 hours, **TIA WIOA Rapid Response staff** will contact **DESC** and other key stakeholder to confirm the Rapid Response Meeting date and to share information about the event. If employees are covered by a collective bargaining agreement, the local union officials will also be contacted by TIA regarding the labor unions participation in the Rapid Response Meeting and/or Worker Orientation. TIA WIOA staff will contact UIA to arrange for representation at the Rapid Response Meeting and/or Worker Orientation as described in step number three above.

## 5. Rapid Response and Worker Orientation Meetings

### **Rapid Response Meeting**

During a Rapid Response Meeting, if possible, priority should be placed on averting or lessening the impact of the layoff. DESC's One-Stop staff will provide information regarding services available to the company such as tax abatement and incentives, bonding programs, on-the-job training, TAA and incumbent worker training programs as applicable. DESC's One-Stop staff will ask key questions such as:

- What is the reason for closing or downsizing?
- Are there any specific resources that can be provided to prevent or lessen the closing or downsizing?
- What other departments or divisions within the business may be impacted by the closing or downsizing?
- What other companies may be impacted by the closing or the downsizing?
- Are layoffs occurring in other locations or states?
- When will the information be made public? - Confidentiality is key.
- When will impacted employees be notified?

In addition to the questions above, additional questions that may be asked as part of the Rapid Response Meeting are included in Attachment A, the WIOA Rapid Response Employer Survey.

The initial Rapid Response (Company and Union, if applicable, Leadership) Meeting shall include DESC's One-Stop staff and TIA WIOA Rapid Response staff and other local stakeholders as necessary, such as the UIA, United Way, the Department of Health and Human Service. The TIA WIOA Rapid Response staff will provide overall information from a state perspective, as well as gathering demographic information about the impacted workforce. DESC with its One-Stop staff will discuss employment services (including Michigan Talent Connect), dislocated worker services and other services available at the One Stop Service Center(s). DESC and its representatives will provide copies of labor market information, brochures, and additional literature specific to its services and programs.

UIA presentations at Rapid Response meetings will include information on filing for unemployment benefits, the MARVIN on-line system, eligibility requirements, and training waivers. The UIA representative will provide appropriate fact sheets and unemployment benefit booklets.

Industry-sector research data will be gathered from the State of Michigan's website, based on the needs of a dislocated worker and its associated employers. This data can be in the form of charts, reports, or brochures, produced by the State. Additional research as appropriate can be facilitated according to stakeholder's needs and/or interests.

### **Worker Orientation Meeting**

At the conclusion of a Rapid Response meeting and upon agreement by the company, a Worker Orientation meeting(s) will be scheduled to provide information on the available services for impacted employees. DESC's One-Stop staff will have responsibility for the following activities:

- Confirming the date(s) and time(s) of the Worker Orientation meeting(s);
- Arranging for the participation of partners from the local One Stop Service Centers and other community agencies to present information; and
- Providing informational materials on available services at the One Stop Service Centers;
- If the company does not agree to an on-site Worker Orientation meeting(s), DESC's One Stop staff should attempt to arrange for an alternative date and location to meet with the impacted workers as a group or individually as

necessary and/or provide informational packets that can be distributed to the impacted workers.

If the parties agree to schedule a Worker Orientation meeting(s) at a later date, DECS's One-Stop staff will serve as the contact for the parties involved and organize the meeting(s) as specified above. The TIA WIOA staff will transmit the request to UIA with the meeting date, time, and location. Upon receipt of confirmation that a UIA representative will attend, the TIA WIOA staff will notify DESC and its One-Stop staff. When a UIA cannot support a worker orientation with a speaker, either in person, via a webinar, or conference call, DESC's One-Stop staff should direct impacted workers to the UIA's website, including the online claim filing kit (UIA Form 1251) and the online service Claimant Web Account Manager. DESC/DCC staff should not answer UI related questions; rather those are to be referred to the UIA Employee Hotline at (800) 500-0017 or the Claimant Web Account Manager on-line services page at [www.michigan.gov/uia](http://www.michigan.gov/uia).

In addition, the MWA Rapid Response staff will distribute the Dislocated Workers Survey to impacted workers as detailed in the Dislocated Worker Survey Policy Issuance.

DESC's One-Stop staff will organize **Job Fairs and Community Assistance** events in response to layoffs in declining sectors, mass layoffs, or high unemployment. The Rapid Response staff will include soliciting employer and agency participation in the event, as well as continued communication with the employer and or event stakeholders. DESC/DCC will hold these events as needed and accommodations will be honored according to the needs of the stakeholders.

## **6. Non-WARN Events and Lack of Notification:**

If DESC/DCC and TIA staff mutually agree that Rapid Response staff participation is necessary for meetings involving non-Warn events, Rapid Response and Worker Orientation meetings may be held in situations involving fewer than 50 employees at the discretion of DESC and the employer. In cases where DESC learns that a business has closed and no prior notification was given, a "Non-WARN Data Sheet" (Attachment B) should be completed to the extent possible and submitted to the following TIA staff person:

**Ms. Teresa Keyton, Talent Investment Agency, State of Michigan**  
**Victor Office Center**  
**201 North Washington Square, 5<sup>th</sup> Floor**  
**Lansing, Michigan 48913**  
**Phone Number: 517-373-7794**  
**KeytonT@michigan.gov**

The information from the Data Sheets, along with survey data will be used to:

- Keep the Governor fully informed of dislocation events and their potential impact on the local communities;
- Respond to Legislative and other inquiries;
- Enable TIA to make informed budgetary decisions with respect to allocation of State Adjustment Grants (SAG's) and WIOA discretionary funding; and
- Comply with federal reporting requirements to include the maintenance of layoff information in the TIA WARN database.

## **7. Additional Rapid Response Activities and Services:**

- A. Joint Adjustment Committees (JACs):** By mutual consent of the company and union (if applicable) in situations where at least 50 workers are being laid off and there is at least 60 days subsequent to the Rapid Response meeting before layoffs are completed, DESC will establish and organize a Joint Adjustment Committee (JAC) with support from the TIA.

DESC's JAC will consist of an ad hoc group of workers and managers who organize to provide adjustment services on behalf of the employees who are about to lose their jobs due to a plant closure or a mass layoff. The purpose of DESC's JAC will be to help displaced workers make a successful transition to a satisfactory job or training in the shortest possible time keeping while keeping compliance with the Talent Investment Agency (Bureau of Workforce Programs) Policy Issuance 06-12, "Establishment of Labor Management Committees also known as Joint Adjustment Committees (JACs) at Sites of Facility Closures and Mass Layoffs," issued September 26, 2006.

DESC will request designated funding from the TIA to support a neutral chair, if desired by the labor/management committee. In the event of an established JAC, DESC will follow the guidelines set forth by the Michigan Talent Investment Agency in Policy Issuance 06-12 or other related PIs.

- B. State Adjustment Grants (SAGs):** DESC may request additional funding for single or multiple dislocation events via a SAG, following the application process outlined in Talent Investment Agency's Policy Issuance 12-32, "Rapid Response State Adjustment Grant (SAG) Application Instructions," issued March 26, 2013. The process will include submitting applications and supporting documents (obligation and wait list reports) and negotiations with the TIA to finalize an award. DESC's SAGs process will follow the specific terms and conditions, including demonstrating that the SAG aligns with MICA and an obligation to spend all or part of the SAG by the end



of the Program Year in which it was granted (or other time period as determined by the Talent Investment Agency).

**Layoff Aversion:** DESC will use Layoff Aversion as part of the Rapid Response system. The process will include an assessment of the potential for averting layoffs in consultation with State or local economic development agencies, including private sector economic development entities and other key partner, up to a year in advance of an actual or potential dislocation event. Incumbent Worker Training (IWT) will also be a part of this strategy and the additional steps outlined in the Talent Investment Agency's PI 12-02 to determine whether the IWT is averting a layoff and whether the training is appropriate. Special attention and reference will be given to the timeframes and activities charted in the USDOL TEN 9-12.

DESC will demonstrate that employers are "at risk" of downsizing or closing, or workers are "at risk" of dislocation prior to providing IWT. DESC will use the "at-risk" criteria set forth by the TIA's PI 12-02.

C. **National Dislocated Worker Grants (NDWGs):** DESC will use National Dislocated Worker Grants (NDWGs) as another form of assistance provided through the Rapid Response System. NDWGs is a discretionary grant awarded by the U.S. Secretary of Labor to provide employment-related services for dislocated workers in specific circumstances. In the event of a natural disaster, DESC will work with the Talent Investment Agency to determine if a National Dislocated Worker Grant is the appropriate action to secure additional funding to service affected workers and to develop the application and project design for a NDWG, in response to a specific dislocation event. This process will include coordinated Federal Emergency Management Agency (FEMA) services in partnerships with the Michigan State Police, Emergency Management and Homeland Security Division, Federal FEMA agencies, the U.S. Small Business Administration, and related Detroit agencies.

D. **Trade Adjustment Assistance (TAA):** DESC will work with the TIA to provide TAA information and resources to the affected company and employees, and if applicable, union officials. DESC will co-enroll eligible Trade Adjustment Assistance customers into the WIOA Dislocated Worker programs. DESC will provide a full range of reemployment services, including mandated services, to eligible workers. In coordination with the DESC's Rapid Response process, TAA services will following the policy and procedures established in the TIA's TAA Comprehensive Manual found at [http://www.michigan.gov/documents/wda/TAA\\_Comprehensive\\_Manual\\_547102\\_7.pdf](http://www.michigan.gov/documents/wda/TAA_Comprehensive_Manual_547102_7.pdf).

DESC's contact person for JACs, SAGs, NDWGs, and TAA is as follows:

**Barkley Scott, Manager – Adult Services**

**[bscott@detempsol.org](mailto:bscott@detempsol.org)**

**Phone: 313.664.5527**

## **8. Monitoring**

DESC's Rapid Response activities will be monitored to ensure that the highest quality of outreach and resource information is provided to customers. Survey data and technical assistance will be provided to ensure continuous quality management services.

State Form Attachments A and B are included in the TIA's Rapid Response PI: 12-23 which can be found at [http://www.michigan.gov/documents/wda/12-23\\_Rapid-Response-Process\\_456842\\_7.pdf](http://www.michigan.gov/documents/wda/12-23_Rapid-Response-Process_456842_7.pdf).





## INTERNAL POLICY DOCUMENT

Policy No. CA 2019-003

<b>Name:</b> Guidance for provision of training services to customers through Individual Training Accounts (ITAs) and other contracted training	<b>Policy Category:</b> Program
<b>Related Federal or State Policy:</b> WIOA Section 134 (c) (G); WIOA Section 129 (c) (2) (D); 20 CFR 680.200 through .230, 680.300 through .350 680.420, 680.550; 20 CFR 681.550; State of Michigan, Talent Investment Agency, Official WIOA Manual; Training and Employment Guidance Letter (TEGL) WIOA No. 19-16	<b>Effective Date:</b> 10/01/2019 <b>Expiration Date:</b> Continuing <b>Reviewed Date:</b> 10/01/2019
<b>Subject:</b> ITA and Other Contracted Training	<b>Unit Responsible for Review:</b> Program
<b>Procedures:</b> N/A	<b>Related DESC Policies:</b> Priority of Service and Self-Sufficiency Definition

### SCOPE

The purpose of this policy is to establish guidelines and procedures for the provision of Individual Training Accounts (ITAs) and other contracted training to Michigan Works! One-Stop Service Centers customers. The Michigan Works! One-Stop Service Centers are branded locally as Detroit at Work Career Centers and braid together a variety of funding streams to provide career and training services. These funding streams include the following: Workforce Innovation and Opportunity Act (WIOA) Adult, Dislocated Worker, or Youth, PATH (Partnership. Accountability. Training. Hope), Food Assistance Employment and Training (FAE&T), Trade Adjustment Assistance (TAA), and other state, local and philanthropic sources.

This policy outlines the process by which the Career Centers screen for suitability for training and assist WIOA, PATH, FAE&T, TAA and other Career Center customers in exploring career and training opportunities. This approach promotes a higher quality experience. PATH and FAE&T customers will have access to the same DESC-selected training programs that are available to WIOA customers. TAA customers are required to have access to a different set of training programs. This policy does not outline the eligibility criteria and participation requirements for TAA, PATH and FAE&T participants seeking occupational skills training. Please refer to the State of Michigan's applicable program manuals and policy issuances for that information.

## BACKGROUND

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Under WIOA, training services are available to qualified employed and unemployed adults and dislocated workers. The selection of training services should be conducted in a manner that maximizes customer choice, is linked to in-demand occupations, is informed by the performance of relevant training providers, and is coordinated to the extent possible with other sources of assistance, including Pell Grants (WIOA sec. 134(c)(3)). Various WIOA rules are referenced throughout this policy to document DESC's alignment with US Department of Labor and State of Michigan Labor and Economic Opportunity – Workforce Development (LEO-WD) agency. DESC uses WIOA guidelines to provide a basic framework for the selection and provision of training services for all of its Career Center programs unless otherwise noted, in order to create a streamlined and integrated system for customers and service providers. WIOA training services are governed by sections 20 CFR 680.200 through .230 and 20 CFR 680.300 through .350 of the WIOA Final Rule.

## POLICY

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The Mayor's Workforce Development Board and DESC have determined that funding occupational skills training through a combination of Individual Training Accounts (ITAs) and contracts is the most suitable strategy for building the skills of customers while meeting the talent needs of employers.

According to WIOA, ITAs are the primary method to be used for procuring training services. An ITA is a payment agreement established on behalf of a participant with a training provider (20 CFR 680.300.) WIOA also allows for the provision of a training contracts instead of an ITA, provided that the MWDB and DESC have fulfilled the customer choice requirements (20 CFR 680.340) and meet one of five exceptions (section 134(c)(3)(G)(ii) of WIOA). In Detroit, the MWDB and DESC have determined that the following allowable exception applies:

- *To use a training services program of demonstrated effectiveness offered in a local area by a community-based organization or other private organization to serve individuals with barriers to employment (emphasis added).*

DESC selects providers for both the supplemented Eligible Training Provider List (ETPL) and training contracts through a competitive procurement process that requires training providers to document that they meet a variety of criteria, including their past success in serving individuals with barriers to employment. A separate DESC policy outlines the criteria used to determine a school's initial and continued eligibility for the ETPL.

DESC provides customers with access to training opportunities in the following high-demand, high-growth sectors, through a combination of ITAs through its supplemented ETPL and contracts for training services:

- Healthcare;
- Information Technology;



- Manufacturing;
- Construction and Transportation; and
- Retail, Hospitality and Entertainment

### **1. Types of Training Opportunities**

DESC is committed to expanding the number and type of effective training opportunities available to customers. DESC recognizes that training efforts must be driven by employer demand and local economic trends. While occupational training leading to an industry-recognized credential will continue to be an important component of the training strategy of the MWDB and DESC, we will also develop and fund programs that may not result in a formal credential including: customized training, short-term occupational skills training, adult education and literacy (foundational skills) training, On the Job Training (OJT) and work experience opportunities. Please see DESC's work-based learning policy for information on requirements and guidelines for the development of those opportunities.

Programs on the supplemented ETPL will always result in an industry-recognized credential, as required by WIOA. DESC will support those types of programs and others through contracts with training providers. Michigan Works! One-Stop Service Centers will educate customers on all types of opportunities and will help the customer select the program that is most aligned with their interests, aptitude and eligibility. DESC will provide the Michigan Works! One-Stop Service Centers with guidance on how to record the various training activities in OSMIS and DESC's local data system.

### **2. Customer Choice**

Michigan Works! One-Stop Service Centers will provide all training services in a manner that maximizes informed customer choice. At a minimum the customer will have the following services and/or documents made available:

- Access to DESC's supplemented ETPL and list of other Contracted Training Services providers;
- Access to training program descriptions for the purpose of research and comparison of training programs. Training program descriptions will include training program information such as requirements for entry, completion rates, placement rates, average wages, duration of program, credentials to be received and other pertinent training-related information; and
- Access to Michigan Works! One-Stop Service Centers resource room including computer and telephone to conduct a research of DESC's approved training programs.



The Michigan Works! One-Stop Service Centers will also provide customers with information on training programs that may be covered by federal financial aid and/or other non-DESC funding sources, in order to comply with WIOA requirements and further promote customer choice and satisfaction with services. DESC will assist in establishing relationships with local educational institutions that offer programs eligible for federal financial aid as well as other training providers that may receive private or public funds for programs. The Michigan Works! One-Stop Service Centers will be responsible for assisting customers in accessing resources that help them navigate the application process for federal financial aid. These resources may include facilitation of workshops and/or guest speakers from local educational institutions and other organizations. The Michigan Works! One-Stop Service Centers may provide career and job placement services to customers that pursue training programs outside of those approved and designated by DESC.

### **3. Eligibility Requirements**

In order to qualify and participate in training programs covered through DESC funds, customers must meet WIOA, PATH, FAE&T and/or other funding source eligibility requirements.

**WIOA Requirements.** Under WIOA, Michigan Works! One-Stop Service Center staff may determine training services are appropriate, regardless of whether the individual has received basic or individualized career services first, and there is no sequence of service requirement. (TEGL 19-16). For training services using WIOA Adult or Dislocated Worker funding, a Michigan Works! One-Stop Service Center staff person must determine that the individual meets all of the following requirements:

- Is unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher wages than wages from previous employment through career services;
- Is in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment;
- Has the skills and qualifications to participate successfully in training services;
- Is unable to obtain grant assistance from other sources to pay the cost of such training, including such sources as state-funded training funds, TAA, and Federal Pell Grants established under title IV of the Higher Education Act of 1965, or required WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants;
- Is determined eligible in accordance with DESC's local priority groups in effect for adults. (See DESC's Priority of Service Policy for additional information.)
- Selected a program of training services that is directly linked to employment opportunities in DESC's high-demand, high-growth industry sectors.

***PATH, FAE&T and TAA Requirements.*** See State of Michigan applicable program manuals and policy issuances.

***Other Requirements.*** In addition to meeting program and funding specific eligibility requirements, customers must meet the following criteria (even when WIOA funds are not used):

- Be determined by the Michigan Works! One-Stop Service Center to be unable to obtain employment leading to self-sufficiency through career services.
- Has the skills and qualifications necessary to successfully participate in the selected training program, including the minimum math and/or reading grade equivalent required for the identified training program; and
- Meet any additional requirements defined by the training provider and/or employer including placement/entrance exams, drug screens, background checks, licenses, prerequisite courses and other requirements.

DESC or one of its contracted Michigan Works! One-Stop Service Centers may approve exceptions to these eligibility requirements, provided the exception is documented and is accompanied by a written justification and approved by the training provider and/or employer.

#### **4. Approval of Training**

Designated Michigan Works! One-Stop Service Center staff will determine the customer's initial eligibility for training and ensure that all supporting documentation has been received, documented and filed. Center staff will submit eligible customers to authorized DESC staff for final review, final assignment of funding source, and approval of the training request prior to the customer beginning any training program.

DESC will only approve funding for training programs on its supplemented ETPL and list of other contracted training programs. DESC will directly provide approved training providers with required documents for invoicing and will directly pay training providers on behalf of the approved participant.

DESC will only approve training participants if the below criteria are met:

- A. Demand Occupation.** Participants will be trained in high-demand, high-growth occupations or sectors as outlined in this policy.
- B. Eligibility Requirements.** Customer has met all required program, funding and training provider eligibility requirements as described in the "Eligibility" section of this policy.

- C. Customer Agreement.** Customer has read and signed the DESC customer training agreement. The customer training agreement outlines the general terms of the agreement and the policy for registration, attendance and cancellation.
- D. Training Research.** Customer must complete comprehensive research and planning for training. The research and plan is designed to assist customer with making an informed choice regarding a training program of interest by comparing other training program(s), which need not be limited to those funded directly by DESC.
- E. Prior Training.** If the customer has previously and successfully completed a training program, the individual may be eligible to obtain support for an additional DESC-funded training program if resources are available and the customer meets all of the following requirements:
1. They completed the previous DESC-funded training program within the last twelve (12) months, are unable to find related employment and the training provider has a training-related placement rate below 50 percent; OR
  2. They completed the previous DESC-funded training program prior to the last twelve (12) months and the Michigan Works! One-Stop Service Center determines the customer has exhausted all training-related employment options and is in need of training that is better aligned to their interests and/or aptitude; AND
  3. Without additional training, the customer is unable to obtain employment leading to self-sufficiency, or is not making a self-sufficient wage; AND
  4. The customer meets program and funding specific eligibility requirements.

DESC will not approve a second training program if the customer withdrew from or failed to complete the initial training program, unless the customer previously requested and was granted additional time to complete the training program due to life circumstances. The Michigan Works! One-Stop Service Center must have this extension documented. If funds are limited, DESC reserves the right to prioritize funds for customers receiving assistance with training for the first time.

The time limit for a customer to enroll into an approved training program is within 30 days of their initial approval notice.





### **5. Limitations**

The US Department of Labor does not identify training services, including Individual Training Accounts, as an entitlement program. Customers must meet eligibility and suitability criteria.

Training funds including ITAs are subject to limitations and may not be used for any of the following:

- Payment of late fees, fines or penalties cause by customer error or that predate the customer's approval of a training program. In exceptional cases, DESC may approve these expenses if the customer demonstrates good cause and DESC has flexible funds that are allowed to be used for these costs;
- Cost of an associate's or bachelor's degree unless:
  - The program of study is approved by DESC; and
  - The customer has no more than two (2) semesters left to complete the training program; and
  - The customer can provide a transcript and signed plan of study from the institution documenting the customer will complete the degree requirements; and
  - The customer does not owe on any previous balances for tuition, fees, fines or penalties.

Training funds including ITAs are limited to \$6,000 per year. This limit may be exceeded if the participant is co-enrolled into another program where grant funds can be leveraged or if the participant is enrolled into PATH. DESC will determine if the limit can be exceeded in negotiating price per person with training providers. This annual maximum includes the following types of training:

- Adult Education and Literacy; and
- Work-based training programs including but not limited to OJT, customized, incumbent worker and apprenticeships.

DESC will only approve training programs that can be completed within twelve (12) months and expects that the majority of approved training programs will be able to be completed in less than six (6) months. If a customer needs additional time to complete an approved training program, the customer must contact the authorized DESC staff to submit a written request for a training extension and must include the reason for the request and support from the training provider. Requests for extensions are subject to approval and may be granted no later than 90 days from the initial authorized and approved end date.

## **6. Training Modifications**

The Michigan Works! One-Stop Service Center may modify the customer's training plan to ensure they meet educational goals and obtain training-related employment. The Michigan Works! One-Stop Service Center may modify the training plan and assist the customer in finding another training program if any of the circumstances below exists:

- The training provider and/or training program has been removed from the MiTC; and/or
- The training provider imposes extraordinary and previously undefined program expenses such as the cost of tools, supplies, tuition, books or any other training-related cost determined required for the completion of the training program; and/or
- The training provider is unable to comply with the terms and conditions outlined in the Master Training Agreement or contract.

The Michigan Works! One-Stop Service Center may not modify the customer's training plan without good cause. See "Satisfactory Progress" for acceptable good causes.

## **7. Satisfactory Progress**

Customers enrolled in an approved training program must demonstrate satisfactory progress in the training program as defined by the training provider. In some instances, a customer may experience a good cause factor that prevents them from making satisfactory progress. Good cause factors may include but are not limited to:

- Illness, injury or disability of the customer or a member of the customer's immediate family;
- Severe weather conditions or natural disaster precluding safe travel;
- Destruction of the training provider's records or property due to a natural disaster or other catastrophe not caused by the customer;
- Acting on misguided or incorrect advice received from an authority, such as the training provider, instructor or career coach;
- Training is delayed or cancelled; or
- Obtaining and accepting training-related employment prior to completion of training.

The Michigan Works! One-Stop Service Center must document any and all of these good cause factors in the customer's file. The Michigan Works! One-Stop Service Center and DESC may grant these customers an extension to complete the program or they may deem them eligible for and approve a second training program.



### **8. Denial of Training**

If the Michigan Works! One-Stop Service Center and/or DESC determines the customer is not eligible for training during the approval review, the Michigan Works! One-Stop Service Center will offer the customer the opportunity to participate in other basic or individualized career services.

DESC will not approve training unless there is a Master Training Agreement or other contract in place, and the vendor appears on the DESC approved list of programs via the supplemented ETPL or other contracted training services list.

If a customer is interested in a program that is not currently approved by DESC, the Michigan Works! One-Stop Service Center should inform the customer that:

- The program is not currently eligible for DESC funds.
- The customer will be responsible for all costs of the program if they decide to enroll into the program without authorization and prior approval, even if the program is on the state's ETPL.

The Michigan Works! One-Stop Service Center should inform DESC of the customer's desired training program so that DESC may invite the training provider to submit the program for consideration through DESC's Funding Opportunity Announcement for Sector Partnerships.

### **9. File Documentation**

Justification and documentation for all requested training must be in the participant's file, DESC's data information system and documented (including case notes) in OSMIS (if applicable). The following items must be documented:

- Assessment results supporting the minimum requirements have been met for the selected program of study. Assessments should support the need for training including a determination by a career coach that the selected training is the best option to lead to self-sufficiency;
- Completed IEP/ISS documenting the selected program of study, anticipated and actual start/end dates and training outcomes;
- Eligibility for grant funding;
- Verification of FAFSA application and award status, if applicable;
- Case note and/or comments in DESC data management system and, if applicable, OSMIS; and

- Documentation of the participant's progress and/or grades.

#### **10. Ongoing Customer Support**

The Michigan Works! One-Stop Service Center must engage with the customer no less than once a month through the lifetime of the training plan, to monitor attendance and ensure that the customer is successfully participating. The Michigan Works! One-Stop Service Center should also address any barriers to success that may arise and must document these contacts in the case file, DESC's local database and OSMIS.

The Michigan Works! One-Stop Service Center must obtain and include documentation of the credential earned, job placement, job retention, wage, occupation, and other pertinent information in DESC's data management system and OSMIS (if applicable) in each of the four (4) quarters following the exit quarter.

#### **11. Grievance and Appeals**

If training request is denied, the customer may request a review by DESC. If DESC upholds the decision of the service provider, the customer has the right to appeal the decision and file a grievance in accordance with the published policy (DESC Non-Discrimination Complaint and Grievance)

### **DEFINITIONS**

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- **Occupational Training, with Industry Recognized Credential:** Classroom training that results in industry-recognized and portable credential and equips participants with technical skills needed for specific jobs. These training programs will be on DESC's Supplemented ETPL (Eligible Training Provider List).
- **Occupational Training, Short-Term:** Shorter-term classroom training (less than 4 weeks) that builds technical and/or foundational skills and increases a participant's chance of obtaining and retaining employment. This training does not necessary result in a credential.
- **Customized Training:** Customized Training is industry and occupation specific skills training delivered through a curriculum designed collaboratively by a training provider, an identified employer(s) and other partners. Customized Training is intended to provide customers with specific skill sets identified as necessary for an industry, occupation or particular position within a company.
- **Adult Education and Literacy /Foundational Skills Training:** Contextualized integrated education and training programs; Career pathway on-ramp programs (also

known as foundational skills bridge programs); Employment-based programs; and/or accelerated high school diploma and equivalency programs. See 2018 “Detroit Adult Foundational Skill Development” report for more detail.<sup>1</sup>

- **Work Experience:** Work experience is a planned, structured learning experience that takes place in a work environment for a limited period of time. Work experience may be paid or unpaid, as appropriate. A work experience may take place in the private for-profit sector, the non-profit sector, or the public sector and is designed to help customers build relevant work experience and skills. Fair labor standards apply in any work experience where an employee/employer relationship exists, as defined by the Fair Labor Standards Act or applicable state and local law.

#### **EFFECTIVE DATE(S)**

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This policy was effective: 10/01/2019

Last Reviewed: 10/01/2019

#### **FREQUENCY OF REVIEW AND UPDATE**

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Annually.

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<sup>1</sup> Corporation for a Skilled Workforce, [http://skilledwork.org/wp-content/uploads/2018/07/Detroit-Adult-Found-Skill-Development-6\\_18\\_18-1.pdf](http://skilledwork.org/wp-content/uploads/2018/07/Detroit-Adult-Found-Skill-Development-6_18_18-1.pdf)



**SIGNATURE, TITLE AND DATE OF APPROVAL**

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This policy, **Guidance for provision of training services to customers through Individual Training Accounts (ITAs) and other contracted training**, was reviewed and authorized by the appropriate C-level staff or Board (listed below) before it was recommended for approval.

Recommended by: Michelle Rafferty, Chief Operating Officer

Date Recommended: 10/01/2019

Approved by:



Name: Terri Weems

Title: Interim CEO & President

Date Approved: 10/1/19





## INTERNAL POLICY DOCUMENT

Policy No. CA 2019-001

<b>Name:</b> Priority of Service & Self-Sufficiency Definition for WIOA Adult	<b>Policy Category:</b> Program
<b>Related Federal or State Policy:</b> Section 134(c)(3)(E) of WIOA; TEGL 19-16	<b>Effective Date:</b> 10/01/2019 <b>Expiration Date:</b> Ongoing <b>Reviewed Date:</b> 10/01/2019
<b>Subject:</b> Priority of Service & Self-Sufficiency Definition for WIOA Adult	<b>Unit Responsible for Review:</b> Program
<b>Procedures:</b> N/A	<b>Related DESC Policies:</b> N/A

### SCOPE

The purpose of this policy is two-fold: 1) establish a policy and practice for prioritizing federally and locally identified populations for the receipt of Workforce Innovation and Opportunity Act (WIOA) Adult individualized career and training services; and 2) establish Detroit's self-sufficiency definition.

### BACKGROUND

Section 134(c)(3)(E) of WIOA establishes a priority requirement with respect to funds allocated to a local area for adult employment and training activities. Under this section, American Job Center staff when using WIOA Adult funds to provide individualized career services, as described in Section 4 of TEGL 19-16, training services, or both, as described in Section 7 of TEGL 19-16, must give priority to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. Under WIOA, priority must be implemented regardless of the amount of funds available to provide services in the local area.

The Local WDB and the Governor may establish a process that also gives priority to other individuals eligible to receive such services, provided that it is consistent with priority of service for veterans (see 20 CFR 680.650) and the priority provisions of WIOA sec. 134(c)(3)(E) and §680.600. There are no restrictions to providing basic career services; they may be provided to any eligible adult.

Veterans and eligible spouses continue to receive priority of service for all US Department of Labor 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 described above, 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.

## POLICY

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Given the Mayor's Workforce Development Board and DESC are responsible for meeting the needs of Detroit job seekers and its WIOA allocations are partially based on the unemployment rate in Detroit, DESC is keenly focused on outreaching to Detroit residents to provide them with career, training and employment services. The MWDB and DESC aims to support local economic growth and vitality by equipping job seekers with the skills they need to be productive workers and sustain themselves and their families. DESC's One-Stop Service Centers are also committed to providing basic career services to all job seekers regardless of where they reside. In some instances, non-residents may also be provided with individualized career and training services.

When working with WIOA **eligible** individuals<sup>1</sup>, staff of the Michigan Works! One-Stop Service Centers (branded locally as Detroit at Work Career Centers) must give priority for receipt of WIOA individualized career and training services to participants in the following order:

- First, to veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient;
- Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are recipients of public assistance, other low-income individuals, and/or individuals who are basic skills deficient;
- Third, to veterans and eligible spouses who are not included in WIOA's priority groups;
- Fourth, to City of Detroit residents who are most likely to struggle to achieve self-sufficiency. According to a recent analysis of American Community Survey data and criminal justice data for Detroit, the WIOA statutory priority populations and the following adult groups are most likely to experience poverty and/or unemployment:
  - Individuals with a criminal background
  - Disengaged workers
  - Single parents
  - Members of two-parent household with young children
- Fifth, to other City of Detroit residents who are below DESC's self-sufficiency standard.
- Sixth, to all other City of Detroit residents
- Seventh, to other **eligible** individuals that are not in the priority groups above.

At all times, regardless of available resources, the Detroit Michigan Works! One-Stop Service

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<sup>1</sup> Individuals who are interested in receiving career and training services under the local priority of service system must first be determined eligible for the service requested.

Centers will give customers within the priority populations stated above first consideration for receipt of individualized career and training services at the time of program enrollment over a person who does not fall into any of the previously listed priority groups. If the services or resources are limited or at capacity, Detroit Michigan Works! One-Stop Service Centers staff will enroll and serve priority populations in the order listed above.

DESC and its contractors will take the following steps to proactively prioritize services for the priority populations:

- Actively recruit these populations through a variety of targeted outreach and marketing methods; and
- Ensure that the vast majority of individualize career and training services are provided to priority populations. DESC and its partners will achieve this by identifying whether the job seeker meets priority criteria during intake for individualized services and categorizing job seekers by group. DESC will add eligible individuals outside of the priority populations to a waiting list to receive individualized/training services and will also provide them with information regarding the Michigan Works! Agency assigned to serving their community. DESC will only consider non-priority individuals for enrollment when there is insufficient demand for services from priority individuals. DESC will determine when there is insufficient demand on a minimum quarterly basis. If there is available capacity, DESC or its contractors will contact individuals on the non-priority waitlist to initiate the enrollment process.

Individuals who are not in a priority of service category but are actively enrolled in a career or training service will be allowed to complete the activity. It is not expected that non-priority service participants must give up their place to an individual who is in a priority of service category and may be just starting a career and/or training service.

## **DEFINITIONS**

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DESC defines the following terms as follows:

1. **Self-Sufficiency** - DESC utilizes the 2017 ALICE (Asset Limited, Income Constrained, Employed) Threshold of \$50,000 for family self-sufficiency income. The ALICE report identified this amount as the income required for the survival of a family of four. DESC considers an individual to be below the self-sufficiency standard if they have an income of \$50,000 or less, regardless of family size.
2. **Veteran**- an individual who has served at least one day in the active military, naval, or air service, and who was discharged or released from service under any condition other than a

condition classified as dishonorable. This definition includes Reserve units and National Guard units activated for Federal Service. For further clarification refer to WIOA Section 3(63)(A) and 38 U.S. Code 101.

3. **Spouse of Veteran**- a spouse of a veteran: who died of a service connected disability; who has a total disability resulting from a service connected disability; who died while a disability so evaluated was in existence; or, any member of the armed forces serving on active duty who, at the time of application for assistance, has been listed for a total of ninety (90) or more days as either missing in action, captured in the line of duty by a hostile force or forcibly detained or interned in the line of duty by a foreign government or power.
4. **Basic Skills Deficient**- an individual that has English reading, writing, or computing skills at or below the 8th grade (8.9 or lower) level. It also includes English language learners and individuals that are unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society. Basic skills deficiency will be determined using an objective, valid and reliable assessment.<sup>2</sup>
5. **Public Assistance**- Federal, State, or local government cash payments for which eligibility is determined by a needs or income test.
6. **Low Income**- An individual who meets any one of the following criteria satisfies the low-income standard for priority for WIOA adult individualized career services and training services:<sup>3</sup> Receives, or in the past six months has received, or is a member of a family that is receiving or in the past six months has received, assistance through the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Supplemental Security Income (SSI) program or state or local income based public assistance; Receives an income or is a member of a family receiving an income that, in relation to family size, is not in excess of the higher of the current U.S. Department of Labor 70 percent Lower Living Standard (LLS) Income Level or the U.S. Department of Health and Human Services (HHS) Poverty Guidelines; Is a homeless individual as defined in §41403(6) of the Violence Against Women Act of 1994, or a homeless child or youth as defined in §725(2) of the McKinney-Vento Homeless Assistance Act; Receives or is eligible to receive a free or reduced-price lunch under the

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<sup>2</sup> WIOA sec. 3(5) defines "basic skills deficient"

<sup>3</sup> WIOA sec. 3(36) defines "low-income individual"





Richard B. Russell National School Lunch Act; Is a foster youth on behalf of whom state or local government payments are made; or Is an individual with a disability whose own income meets: WIOA's income requirements, even if the individual's family income does not meet the income requirements; or The income eligibility criteria for payments under any federal, state, or local public assistance program. *Note: 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.*

7. **Residents with a Criminal Background.** An individual with one or more misdemeanor or felony convictions or with an arrest record.
8. **Disengaged Workers.** A working age adult who is unemployed and has not been actively seeking employment, including those who have been out of work for an extended period of time
9. **Single Parents.** Single, custodial parent with children under the age of 18
10. **Member of a two-parent household with young children.** Adult member of a household who is a caregiver to one or more children under the age of 5 who also live in the household.

#### **EFFECTIVE DATE(S)**

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This policy was effective: 10/01/2019  
Last Reviewed: 10/01/2019

#### **FREQUENCY OF REVIEW AND UPDATE**

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Annually

**SIGNATURE, TITLE AND DATE OF APPROVAL**

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This policy, **Priority of Service & Self-Sufficiency Definition for WIOA Adult**, was reviewed and authorized by the appropriate C-level staff or Board (listed below) before it was recommended for approval.

Recommended by: Michelle Rafferty, Chief Operating Officer

Date Recommended: 09/30/2019

Approved by:



Name: Terri Weems

Title: Interim CEO & President

Date Approved: 9/30/19





**INTERNAL POLICY DOCUMENT**  
**Policy No. CA 2019-002**

<b>Name:</b> WIOA ADULT AND DISLOCATED WORKER AND SPECIAL PROGRAM SUPPORTIVE SERVICES and NEEDS-RELATED PAYMENTS POLICY	<b>Policy Category:</b> Program
<b>Related Federal or State Policy:</b> State of Michigan, Talent Investment Agency, Official Workforce Innovation and Opportunity Act (WIOA) Manual for WIOA Title I Adult, Dislocated Worker and Youth Programs	<b>Effective Date:</b> 10/01/2019 <b>Expiration Date:</b> Continuing <b>Reviewed Date:</b> 10/01/2019
<b>Subject:</b> Supportive Services and Needs-Related Payments (NRP)	<b>Unit Responsible for Review:</b> Program
<b>Procedures:</b> N/A	<b>Related DESC Policies:</b> N/A

## SCOPE

To establish a policy for Detroit Employment Solutions Corporation's (DESC's) service providers and/or contractors regarding supportive services and needs-related payments provided to participants who are served in programs supported with Workforce Innovation and Opportunity Act (WIOA) Adult or Dislocated Worker funds and other state, local and philanthropic funding through Michigan Works! One-Stop Service Centers (branded locally as Detroit at Work Career Centers.) The Michigan Works! Agencies (MWAs) are charged with managing payment of supportive services and needs-related payments and are responsible for ensuring they are appropriate and properly documented. This policy also applies to workforce programs funded by DESC and managed by the One-Stop Service Center contractors, when a specific policy is not already in place. This excludes the Partnership. Accountability. Training. Hope. (PATH), Food Assistance Employment & Training (FAE&T), Trade Adjustment Assistance (TAA) and WIOA Youth programs. Detroit at Work Career Center contractors should refer to the State of Michigan's manuals or policy issuances for the PATH, FAE&T, and TAA programs for guidance on allowable supportive services.

## BACKGROUND

See TEGL 19-16 for background on WIOA requirements and guidelines for the provision of supportive services and Needs-Related Payments.

## **POLICY**

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DESC contractors may provide supportive services when necessary to eliminate barriers faced by job seekers to accessing and participating in training or employment opportunities. All DESC contractors shall adhere to DESC's and the State of Michigan's Workforce Development Agency (WDA) limitations and guidelines established for the provision of supportive services as outlined in this policy. DESC contractors shall document supportive service provision in the One-Stop Management Information System (OSMIS) *and* the local DESC case management system in the applicable Supportive Service areas.

Through the intake and assessment process, contractors should determine if the participant is enrolled in other programs that provide related supportive services. Contractors should maintain relationships with community and social organizations that provide supportive services in-kind. Contractors should ensure these alternative sources for expenses are explored by customer or contractor prior to authorizing any supportive service. Under no circumstance may a contractor provide a supportive service if the supportive service is readily available in a timely manner from another source. Contractor and participant must identify supportive services needs during the intake/assessment process and include them in the Individual Employment Plan (IEP). The contractor must update the IEP to add additional supportive services needs as they become identified. Contractor shall use acceptable accounting procedures and follow WDA, DESC and their own procurement requirements in the provision of supportive services. Contractor shall document that the supportive service is not readily available through other sources and/or document referral of the customer to other partners and resources.

Supportive services are not intended to meet every need of the participant and are not a participant entitlement. Supportive services are to provide temporary assistance to eligible participants. Staff should assist the participant with developing a plan to cover supportive service assistance once he/she has exhausted their supportive service limit or once WIOA or other special program funds are no longer appropriate for the individual.

### **1. Eligibility & Documentation**

A participant is eligible to receive a supportive service if: 1) they have been enrolled into the WIOA Adult or Dislocated Worker program or another individualized program funded by DESC and managed by the One-Stop Service Centers (Detroit at Work Career Centers); 2) the supportive service is required to enable the participant to successfully complete the WIOA or other individualized program and achieve training and employment goals; and 3) the need for the service is documented in their IEP. At a minimum, contractors must document that the participant has a specific identified employment or training-related barrier(s), which can be addressed and removed through supportive service(s) provision. Contractor must document proper justification for a participant's receipt of supportive services in the case notes and reflect Contractor's attempts to find funding for the participant's needs through other sources.

DESC considers all participants enrolled into occupational skills training or work-based learning that is supported with a DESC funding source (WIOA and others) to be part of an individualized



program *and* a WIOA Basic Career Services customer (known in OSMIS as a “reportable individual.”) **However, the contractor shall only use WIOA funds to provide supportive services if the participant is fully registered into WIOA Adult or Dislocated Worker in OSMIS.** A participant must be actively enrolled in the Adult or Dislocated Worker program to be eligible for WIOA-funded supportive services. Once a participant is exited in OSMIS or if they are receiving *only* Follow-Up services, they cannot receive WIOA-funded supportive services. If a contractor provides supportive services to job seekers who are not actively registered in WIOA individualized career/training services, they may use other non-WIOA funds awarded by DESC if resources are available and all other guidelines in this policy are followed.

If sufficient funds are available, contractor may also provide supportive services to participants they actively assisted to enroll in occupational or foundational skills training programs supported through non-DESC funds (e.g., Pell grant), provided the activity is documented in their IEP. Contractors may also provide a limited number of *non-WIOA funded* bus passes to job seekers who are receiving WIOA Basic Career Services *only* and are not enrolled into an individualized program, in the event these bus passes are needed by the customer to achieve employment goals (e.g., job search activity or research of training programs, as outlined below.)

## **2. Timing**

The contracted service providers shall respond in a timely manner when supportive services are requested by participants. In cases where the request is an emergency (i.e., participant is at risk of losing employment without immediate action), DESC’s contractors must respond within 24 hours to the request. Contractors should provide other non-emergency supportive services on an “as needed” basis in accordance with the limitations set forth in this policy.

## **3. Availability & Limitations**

Contractors should consider the availability of funds and the individual’s demonstrated need when evaluating requests for supportive services. Contractors must enforce the following twelve (12) month caps on supportive service provision, unless they are provided with written approval from DESC to exceed the cap. Because funds are limited each year, DESC and its contractors cannot guarantee that participants will receive supports equal to the allowable cap. Supportive services received through a DESC contracted training provider and defined as such in the training provider’s contract must be counted towards the cap. Contractors do **not** have to consider equipment, tools, and supplies that are specific to the training program and that are included in the training provider’s contract when managing the cap per customer. A twelve (12) month period is defined as twelve (12) months from the date of eligibility determination and enrollment into WIOA or another individualized One-Stop program.

- For WIOA participants **not** enrolled in occupational skills training: cumulative total is limited to \$500.00 per 12-month period.
- For participants enrolled in occupational skills training during the 12-month period: cumulative total is limited to \$750.00.



- If a participant is co-enrolled in WIOA and another individualized program that provides for additional funds, these limits may be exceeded if contractor receives prior written approval from DESC.
- If the contractor believes an individual WIOA participant is in need of additional supportive services beyond the annual cap in order to achieve the goals in their IEP, they may request written approval from DESC to exceed the caps.
- Employed participants may receive most supportive services for a maximum of 90 consecutive calendar days after the first date of employment. **Contractor shall not use WIOA funds after the participant is exited from the WIOA-Adult or Dislocated Worker programs.** Some one-time supportive services (e.g. automobile repair, temporary transportation assistance) may be provided for up to twelve months after first date of employment if the participant is at risk of losing job; *non-WIOA funds must be used in these instances if the participant has been exited.*

#### 4. Allowable Supportive Services

Allowable supportive services are outlined in the attached table, along with the prescribed cap and required documentation for each type.

#### 5. Disallowed Supportive Services

Support services **may not** be utilized to pay for expenses incurred prior to the participant's enrollment into a WIOA or other individualized program. Additionally, DESC strictly prohibits use of WIOA funds for the following items:

- Fines and penalties such as traffic violations, parking tickets, late finance charges, and interest payments
- Defaulted loans
- Contributions or donations
- Internet or phone service (prepaid, plan, minutes, etc.)
- Refundable deposits
- Pet food
- Out-of-state job search and relocation expenses
- Driver's license reinstatement or driver's responsibility fees;
- Entertainment, including tips
- Business startup costs
- Vehicle or mortgage payments
- Alcohol or tobacco products
- Items for family members or friends

#### 6. Needs Related Payments

In limited circumstances and only with prior written approval from DESC, contractors may provide needs-related payments to participants in occupational skills training who are unable to complete the program without such assistance. DESC recognizes participants face monetary constraints while in training that can make enrollment and completion challenging. Due to limited resources, DESC encourages contractors to connect participants to any available non-DESC resources to supplement income while in training. Contractors may only provide support with needs related payments under exceptional circumstances. DESC limits eligibility for needs-related payments to participants co-enrolled in other programs where additional non-WIOA funds can be



leveraged. A participant must be low-income to qualify, and payments will be limited to \$75/week in the unusual circumstance they are approved. Under all circumstances, contractor must seek prior written approval from DESC.

#### **7. Vouchers and Vendor Checks**

All vouchers issued to participants must include the participant's and vendor's name. This requires a participant signature and presentation of ID when voucher(s) are redeemed.

#### **8. Approval**

All requests for supportive services will be approved in writing by a supervisor responsible for managing Contractor's staff. Any item other than those listed in the attached table must have prior written approval by DESC to ensure grant fiscal and programmatic compliance.

### **DEFINITIONS**

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See attached table of supportive services and associated caps and guidelines.

### **EFFECTIVE DATE(S)**

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This policy was effective: 10/01/2019  
Last Reviewed: 10/01/2019

### **FREQUENCY OF REVIEW AND UPDATE**

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Annually

**SIGNATURE, TITLE AND DATE OF APPROVAL**

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This policy, WIOA ADULT AND DISLOCATED WORKER AND SPECIAL PROGRAM SUPPORTIVE SERVICES and NEEDS-RELATED PAYMENTS POLICY, was reviewed and authorized by the appropriate C-level staff or Board (listed below) before it was recommended for approval.

Recommended by: Michelle Rafferty, Chief Operating Officer

Date Recommended: 9/30/2019

Approved by:

  
Name: Terri Weems

Title: Interim CEO and President, DESC

Date Approved: 9/30/19.





## Attachment: Table of Supportive Services

Supportive Service Type	Cap for a 12-month period and/or lifetime	Eligibility & Required Documentation
Transportation Allowance (Privately Owned Vehicle)	\$25/week maximum	<p>Participants enrolled into an approved training activity (basic skills, occupational or foundational skills, OJT, work experience) or up to 90 days after entering unsubsidized employment.</p> <p>Contractor must have the following prior to providing participant with a credit card for gasoline purchase:</p> <ul style="list-style-type: none"> <li>• Employment verification form, training plan/program agreements, copies of check stubs/timesheets, or attendance verification form.</li> </ul>
Dart Bus Passes	<ul style="list-style-type: none"> <li>• <b>2 four-hour Dart passes</b> per week for participants receiving <i>only</i> Basic Career Services. (NON-WIOA FUNDS ONLY)</li> <li>• <b>Up to 5 twenty-four (24) hour Dart passes or 1 seven (7) day Dart pass</b> per week for participants enrolled in approved training program.</li> <li>• <b>Up to 10 twenty-four (24) hour Dart passes</b> upon verification of new employment to support customer during the first two weeks of employment.</li> </ul> <p>Participants may ride on DDOT and SMART using a Dart pass. Participants have unlimited rides in any direction on both systems within the time limit allowed.</p>	<p>Participants enrolled into an approved training activity (basic skills, occupational, OJT, work experience), researching training programs, in active job search, or up to 90 days after entering unsubsidized employment. Basic Career Services only participants must meet with contractor staff once per month to remain eligible for bus tickets.</p> <p>Contractor must have the following prior to providing bus tickets:</p> <ol style="list-style-type: none"> <li>1. Employment verification form, training plan/program agreements, copies of check stubs/timesheets, or attendance verification form.; OR</li> <li>2. Documentation of planned job search/interview activity or training provider research activity.</li> </ol>
Shared Ride Services	<p>\$500 per 12-month period;</p> <p>Shared ride credits in the form of a discount code (e.g. Lyft, Uber, Maven, etc.) - up to</p>	<p>Participants co-enrolled into another program or initiative that involves an approved training activity (basic skills, occupational, OJT, work</p>



Supportive Service Type	Cap for a 12-month period and/or lifetime	Eligibility & Required Documentation
	\$200 per week minus value of any bus tickets provided.	<p>experience), or up to 90 days after entering unsubsidized employment.</p> <p>Contractor should work with participant to determine best use of limited shared ride credits. Where feasible, participants should utilize public transit or other more cost-effective methods of travel. Some instances may warrant the use of a shared ride credit even if public transit is available (e.g., use of shared ride credits during first week of job to avoid tardiness).</p> <p><i>Contractor may use the Google app "Transit" or another tool to assist participants in identifying cost and time effective methods for combining transportation options.</i></p> <p>Contractor must have the following prior to providing shared ride credits:</p> <ul style="list-style-type: none"><li>• Employment verification form, training plan/program agreements, copies of check stubs/timesheets, or attendance verification form.</li></ul>
Automobile Repairs	<p>\$500 per 12-Month Period; \$1,000 limit per 3-year period;</p> <p>The cost of the repairs may not exceed the vehicle's retail value.</p> <p><i>Allowable Repairs:</i></p> <ul style="list-style-type: none"><li>• Brakes</li><li>• Fuel Pumps</li><li>• Radiator</li><li>• Shocks and</li><li>• Tires</li><li>• Wheel</li><li>• Batteries</li></ul>	<p>The participant must be enrolled in an approved training program or be in the first twelve months of an unsubsidized job. The automobile must be the participant's primary means of transportation. The repair must also make the car drivable.</p> <p>Contractor must have the following prior to authorization and approval of car repairs:</p> <ol style="list-style-type: none"><li>1. Copy of vehicle title in participant's name;</li><li>2. Copy of Kelly Blue Book Trade-In value;</li></ol>



<b>Supportive Service Type</b>	<b>Cap for a 12-month period and/or lifetime</b>	<b>Eligibility &amp; Required Documentation</b>
	<p><i>Disallowed Repairs:</i></p> <ul style="list-style-type: none"><li>• Engine/Transmission</li><li>• Collision Repairs</li><li>• Regular Maintenance</li><li>• Tune-up</li><li>• Oil Changes</li></ul>	<ol style="list-style-type: none"><li>3. Copy of current vehicle registration and valid insurance (in name of participant);</li><li>4. Copy of the participant's current driver's license; and</li><li>5. Two (2) estimates from ASE certified mechanics.</li></ol>
<b>Automobile Insurance</b>	<p>DESC recognizes the cost of automobile insurance presents a significant employment barrier to participants. Due to limited resources, DESC encourages contractors to connect participants to any available non-DESC resources to address this expense. Contractors may only provide support with car insurance under exceptional circumstances. Limited to participants co-enrolled in another program where funds can be leveraged for overall support of customer.</p>	<p>DESC must provide prior written approval and contractor must document how they and/or customer have explored other community resources.</p>
<b>Automobile Purchase</b>	<p>DESC recognizes the cost of purchasing an automobile presents a significant employment barrier to participants. Due to limited resources, DESC encourages contractors to connect participants to any available non-DESC resources to address this expense. Contractors may only provide support with automobile purchase under exceptional circumstances. Limited to participants co-enrolled in another program where funds can be leveraged for overall support of customer.</p>	<p>DESC must provide prior written approval and contractor must document how they and/or customer have explored other community resources.</p>
<b>Interview/Work Clothing</b>	<p>\$150 per 12-Month Period;</p> <p>Common allowable clothing purchases include but are not limited to: shirts, pants, shoes, ties, dresses, blouses, jackets, etc.</p>	<p>Participants may be provided clothing after attending orientation and for up to 90 days after entering unsubsidized employment.</p> <p>Contractor should identify one or more vendors from which they can directly purchase clothing (following the contractor's procurement</p>



Supportive Service Type	Cap for a 12-month period and/or lifetime	Eligibility & Required Documentation
		policy). Contractor must keep the following documentation on file: <ol style="list-style-type: none"><li>1. Documentation identifying the selected vendor(s) offering clothing at a competitive price;</li><li>2. Receipt of purchase.</li></ol>
Tools/Job Related Expenses	<p>\$500 limit per 3 year period; Limit does not apply to tools purchased by training provider through DESC contract.</p> <p>Job related expenses may include but are not limited to:</p> <ul style="list-style-type: none"><li>• Drug Screens</li><li>• Background</li><li>• Physical examinations</li><li>• Corrective lenses</li><li>• Work tools</li><li>• Boots/shoes, protective equipment</li></ul>	<p>Participants enrolled into an approved training activity (basic skills, occupational, On the Job Training, work experience) or up to 90 days after entering unsubsidized employment may receive support for tools and/or job specific supplies determined necessary to perform work activities. Not available to participants if they are in a training program with a provider that includes related tools and supplies in their contract with DESC.</p> <p>Contractor must have the following prior to purchasing job-related tools/supplies:</p> <ol style="list-style-type: none"><li>1. Employment verification form or training plan/program agreement;</li><li>2. Letter stating required tools (on employer/ training provider letterhead and signed by authorized representative) or document from DESC that outlines the tools/equipment participant must have <i>prior</i> to beginning training; and</li><li>3. Two quotes indicating cost/store contact information</li></ol>
Training Related Expenses	<p>\$250 per 3 year period; Limit does not apply to equipment or supplies purchased by training provider through DESC contract.</p> <p>Training related expenses may include but are not limited to:</p>	<p>Participant must be participating in a training program or attempting to enroll into a training program. Contractor must verify that the training requirements are not met through training provider's DESC contract.</p>





Supportive Service Type	Cap for a 12-month period and/or lifetime	Eligibility & Required Documentation
	<ul style="list-style-type: none"><li>• Approved course</li><li>• Background</li><li>• Physical exam</li><li>• Training-related licenses</li><li>• Test/exam fee</li><li>• Drug screen</li><li>• Uniforms, boots</li></ul> <p>Computers/tablets or payments for internet service are not permissible.</p>	<p>Contractor must have the following prior to providing training-related supports:</p> <ol style="list-style-type: none"><li>1. Training plan/program agreement;</li><li>2. List of required exams, fees, uniforms, and equipment from the authorized training provider on school/employer letterhead and signed by an authorized representative or document from DESC that outlines the exams/background checks/tools/equipment participant must have <i>prior</i> to beginning training;</li><li>3. Two quotes indicating cost and vendor information.</li></ol> <p>In addition, contractor must keep receipt of purchase on file.</p>
Need Related Payments	<p>DESC recognizes participants face monetary constraints while in training that can make enrollment and completion challenging. Due to limited resources, DESC encourages contractors to connect participants to any available non-DESC resources to supplement income while in training. Contractors may only provide support with needs related payments under exceptional circumstances. Limited to participants who are low-income and co-enrolled in another program where funds can be leveraged. Payments cannot exceed \$75/week.</p>	<p>DESC must provide prior written approval and contractor must document how they and/or customer have explored other community resources.</p>
Child Care Subsidies	<p>DESC recognizes the availability of affordable and quality childcare poses a significant barrier to participation in training and employment. Due to limited resources, DESC encourages contractors to connect participants to any available non-DESC resources to secure stable childcare. Contractors may only provide subsidies for</p>	<p>DESC must provide prior written approval and contractor must document how they and/or customer have explored other community resources.</p>





Supportive Service Type	Cap for a 12-month period and/or lifetime	Eligibility & Required Documentation
	childcare under exceptional circumstances. Limited to participants co-enrolled in another program where funds can be leveraged.	