



A proud partner of the  americanjobcenter network

**Northeastern Arizona
Local Workforce Development Area
Policy Manual**

Northeastern Arizona Local Workforce Development Area Policy Manual

Contents

SECTION 100 ADULT AND DISLOCATED WORKER PROGRAMS POLICIES AND PROCEDURES.....	1
100 BACKGROUND AND PURPOSE	1
101 AUTHORITY	1
102 PROGRAM REQUIREMENTS	1
103 SERVICES FOR ADULTS AND DISLOCATED WORKERS	1
103.1 CAREER SERVICES	2
103.2 TRAINING SERVICES	6
104 REGISTRATION, ENROLLMENT, AND DATA ENTRY	6
105 CO-ENROLLMENT	8
106 PROGRAM EXITS	9
107 ADULT PROGRAM PRIORITY OF SERVICE	11
107.1 ORDER OF PRIORITY	11
107.2 LOW INCOME.....	12
107.3 BASIC SKILLS DEFICIENT.....	12
107.4 DOCUMENTING LOW-INCOME STATUS FOR PRIORITY OF SERVICE	12
107.5 WIOA Title IB Adult Program PRIORITY GROUPS	14
108 PROGRAM ELIGIBILITY	14
108.1 WIOA Title I-B ADULT ELIGIBILITY	15
108.2 WIOA TITLE IB DISLOCATED WORKER ELIGIBILITY	15
108.3 WIOA DISLOCATED WORKER VERIFICATION OF LAYOFF OR TERMINATION	17
108.4 INTERIM EMPLOYMENT	18
109 SELECTIVE SERVICE REGISTRATION REQUIREMENTS.....	18
SECTION 200 YOUTH PROGRAMS POLICIES AND PROCEDURES.....	21
201 BACKGROUND	21
202 AUTHORITY	21
203 PROGRAM REQUIREMENTS	21
203.1 LINKAGES TO COMMUNITY PARTNERS	22
203.2 OUT-OF-SCHOOL PRIORITY	22
203.3 REFERRALS	23
203.4 YOUTH SERVICES.....	23
204 YOUTH PROGRAM ELEMENTS	25
204.1 PROGRAM ELEMENT 1: TUTORING, STUDY SKILLS TRAINING, INSTRUCTION,	

DROP OUT PREVENTION SERVICES	25
204.2 PROGRAM ELEMENT 2: ALTERNATIVE SECONDARY SCHOOL SERVICES OR RECOVERY SERVICES	26
204.3 PROGRAM ELEMENT 3: WORK EXPERIENCES	26
204.4 PROGRAM ELEMENT 4: OCCUPATIONAL SKILLS TRAINING	29
204.5 PROGRAM ELEMENT 5: EDUCATION OFFERED CONCURRENTLY WITH WORKFORCE PREPARATION AND TRAINING FOR A SPECIFIC OCCUPATION	30
204.6 PROGRAM ELEMENT 6: LEADERSHIP DEVELOPMENT OPPORTUNITIES.....	30
204.7 PROGRAM ELEMENT 7: SUPPORTIVE SERVICES	31
204.8 PROGRAM ELEMENT 8: ADULT MENTORING	31
204.9 PROGRAM ELEMENT 9: FOLLOW-UP SERVICES	31
204.10 PROGRAM ELEMENT 10: COMPREHENSIVE GUIDANCE AND COUNSELING	33
204.11 PROGRAM ELEMENT 11: FINANCIAL LITERACY ACTIVITIES	33
204.12 PROGRAM ELEMENT 12: ENTREPRENEURIAL SKILLS TRAINING.....	34
204.13 PROGRAM ELEMENT 13: SERVICES THAT PROVIDE LABOR MARKET INFORMATION.....	34
204.14 PROGRAM ELEMENT 14: POSTSECONDARY PREPARATION AND TRANSITION ACTIVITIES.....	35
205 ELIGIBILITY DETERMINATION	35
205.1 OUT-OF-SCHOOL YOUTH.....	36
205.2 IN-SCHOOL YOUTH	36
205.3 ELIGIBILITY BARRIER DEFINITIONS	37
205.4 SCHOOL STATUS.....	38
205.5 NEEDS ADDITIONAL ASSISTANCE CRITERION.....	39
205.6 LOW-INCOME REQUIREMENTS.....	39
205.7 NON-LOW INCOME YOUTH.....	40
206 DOCUMENTATION FOR ELIGIBILITY	40
206.1 GENERAL REQUIREMENTS	40
206.2 DETERMINING LOW-INCOME STATUS.....	41
206.3 HIGH POVERTY AREAS	42
206.4 INCOME VERIFICATION	43
206.5 SELECTIVE SERVICE REQUIREMENTS	45
206.6 BASIC SKILL ASSESSMENT FOR OBJECTIVE ASSESSMENT.....	45
207 REGISTRATION, ENROLLMENT AND DATA ENTRY.....	46
207.1 REGISTRATION, ENROLLMENT AND DATA ENTRY REQUIREMENTS.....	46
207.2 CO-ENROLLMENT.....	47
208 INCENTIVE PAYMENTS.....	48
209 PROGRAM EXITS	49

SECTION 300 SUPPORTIVE SERVICES.....	51
301 BACKGROUND	51
302 AUTHORITY	51
303 SUPPORTIVE SERVICE REQUIREMENTS	51
304 TYPES OF SUPPORTIVE SERVICES	52
305 TRAINING-RELATED EXPENSES	52
306 NEEDS-RELATED PAYMENTS.....	54
307 SUPPORTIVE SERVICE PROHIBITIONS	54
308 CHILD CARE.....	54
309 FOLLOW-UP SERVICES.....	55
SECTION 500 ADULT, DISLOCATED WORKER, AND YOUTH PROGRAMS TRAINING SERVICES POLICIES AND PROCEDURES.....	56
501 BACKGROUND	56
502 AUTHORITY	56
503 PROGRAM PARTICIPANT ELIGIBILITY FOR TRAINING SERVICES.....	56
504 TYPES OF TRAINING SERVICES	57
505 EMPLOYER ELIGIBILITY FOR WORK-BASED TRAINING	63
506 ADMINISTRATIVE REQUIREMENTS FOR WORK-BASED TRAINING	63
507 ADULT, DISLOCATED WORKER AND YOUTH SERVICE PROVIDER RESPONSIBILITIES	64
508 CREDENTIALS	65
509 FUNDING TRAINING SERVICES.....	68
510 PELL GRANTS.....	69
511 INDIVIDUAL TRAINING ACCOUNT (ITA).....	70
SECTION 600 MONITORING POLICY (PROGRAM ONLY)	72
600 BACKGROUND	72
601 AUTHORITY	72
602 SUBRECIPIENT DETERMINATION	73
603 SCHEDULING OF ANNUAL MONITORING REVIEW	73
604 MONITORING FREQUENCY	74
605 CONDUCTING MONITORING REVIEWS.....	74
606 MONITORING REPORT.....	75
607 STEPS TO CLOSURE	76
608 TRAINING PROVIDER/CONTRACTOR MONITORING REVIEW	76
609 ELIGIBLE TRAINING PROVIDER MONITORING REVIEWS	76
610 TRAINING CONTRACTORS	77
611 CONFIDENTIALITY, DATA AND RETENTION.....	78

SECTION 700 EQUAL OPPORTUNITY POLICY	79
700 BACKGROUND:	79
701 AUTHORITY	80
702 COMPLIANCE.....	80
703 NOTICE AND COMMUNICATION.....	81
704 NOTICE TO SPECIAL POPULATIONS	81
705 RESPONSIBILITY TO PROVIDE SERVICES AND INFORMATION TO INDIVIDUALS WITH DISABILITIES AND/OR IN LANGUAGES OTHER THAN ENGLISH.....	82
706 REVIEW OF ASSURANCES, JOB TRAINING PLANS, CONTRACTS, AND POLICIES AND PROCEDURES.....	82
707 UNIVERSAL ACCESS.....	83
708 COMPLIANCE WITH SECTION 504 AND THE REHABILITATION ACT OF 1973, AS AMENDED AND 29 CFR PART 38.	83
709 DATA AND INFORMATION COLLECTION AND MAINTENANCE	83
710 COMPLAINT PROCESSING PROCEDURES	83
711 COMPLIANCE ASSURANCES – CONTRACTORS AND SERVICE PROVIDERS	84
712 COMMUNICATION SYSTEM.....	84
713 MONITORING.....	84
601 EO CONTACTS	84
SECTION 800 COMPLAINTS, GRIEVANCES, AND APPEALS POLICY.....	85
800 BACKGROUND – ALLEGED DISCRIMINATION.....	85
801 AUTHORITY	85
802 DEFINITIONS.....	86
803 REASONS FOR FILING A DISCRIMINATION COMPLAINT	87
804 TIMELY FILINGS	88
805 FILING A COMPLAINT	89
806 LACK OF INFORMATION IN A FILED COMPLAINT:.....	90
807 PROCESSING A COMPLAINT	91
808 COMPLAINTS BASED ON REASONS OTHER THAN DISCRIMINATION.....	91
809 ALTERNATIVE DISPUTE RESOLUTION (ADR)	92
809.1 ALTERNATE DISPUTE RESOLUTION/MEDIATION PROCESS.....	92
810 NOTICE OF FINAL ACTION	93
811 CONFIDENTIALITY OF ALL COMPLAINTS	94
812 INTIMIDATION AND RETALIATION PROHIBITED ON ALL COMPLAINTS.....	94
813 RECORD RETENTION ALL COMPLAINTS.....	94
814 BACKGROUND – ALLEGED VIOLATIONS OF THE REQUIRMENTS OF TITLE I OF THE WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA).....	95
815 AUTHORITY	96

816	DEFINITIONS.....	96
817	REASONS FOR FILING A PROGRAMMATIC COMPLAINT	97
818	TIMELY FILINGS	97
819	FILING A COMPLAINT	98
820	LACK OF INFORMATION IN A FILED COMPLAINT	99
821	PROCESSING A COMPLAINT	99
822	APPEAL OF A COMPLAINT DECISION.....	100
823	CONFIDENTIALITY OF ALL COMPLAINTS	101
824	INTIMIDATION AND RETALIATION PROHIBITED ON ALL COMPLAINTS.....	101
825	RECORD RETENTION ALL COMPLAINTS.....	101
	EXHIBITS	102

**Northeastern Arizona Local
Workforce Development
Board (Approval Authority)**

Effective Date: **SECTION 100 ADULT AND
DISLOCATED WORKER
PROGRAMS POLICIES AND
PROCEDURES**
Revision Date:
Approval Date:

100 BACKGROUND AND PURPOSE

This section provides policy and procedures for ARIZONA@WORK Northeastern Arizona service providers to use when determining eligibility and providing services governed by the Workforce Innovation and Opportunity Act (WIOA) for clients of both the Adult and Dislocated Worker programs

101 AUTHORITY

- Workforce Innovation and Opportunity Act (WIOA) (P.L. 113-128)
- Workforce Innovation and Opportunity Act Final Rules 20 CFR 678.430
- Workforce Innovation and Opportunity Act Final Rules 20 CFR 680
- Training and Employment Guidance Letter (TEGL) 17-05
- Training and Employment Guidance Letter (TEGL) 15-10
- Training and Employment Guidance Letter (TEGL) 03-15
- Military Selective Service Act, Section 3, as amended at 50 U.S.C. Appendix 453
- Arizona Department of Economic Security WIOA Policy and Procedure Manual

102 PROGRAM REQUIREMENTS

The ARIZONA@WORK Northeastern Arizona WIOA Title IB Adult Program provides workforce activities designed to increase, the employment, retention, earnings, and attainment of recognized postsecondary credentials of adults age 18 and older, particularly for individuals with barriers to employment. As a result, this should improve the quality of the Northeastern Arizona workforce, reducing dependency on public assistance, increasing economic self-sufficiency, and enhancing the productivity and competitiveness of the county.

The ARIZONA@WORK Northeastern Arizona WIOA Title IB Dislocated Worker program provides services to individuals who have been terminated through no fault of their own, laid off, or have received notice of termination or layoff, from employment generally due to plant closures or downsizing. Self-employed individuals who are unemployed due to general economic conditions and individuals who meet the WIOA definition of a displaced homemaker may also be eligible for services.

103 SERVICES FOR ADULTS AND DISLOCATED WORKERS

WIOA establishes two levels of services for adults and dislocated workers: Career Services and Training Services.

103.1 CAREER SERVICES

Career services for eligible adults and dislocated workers must be available in the ARIZONA@WORK Northeastern Arizona service delivery system. There are three types of career services, A) Basic Career Services; B) Individualized Career Services; and C) Follow-up Services.

A. Basic Career Services

Basic career services must be made available to all adults and dislocated workers accessing the ARIZONA@WORK Northeastern Arizona service delivery system. However, not all individuals will receive all services. When an adult or dislocated worker receives a basic career service that requires *significant staff assistance*, he or she must be enrolled in either the Adult or Dislocated Worker program. Services beyond self-guided job seeker tasks, such as a computer-based job search, or when information is provided by staff to the job seeker is not considered significant assistance and would not require enrollment.

Basic career services do not require the creation or retention of hard copy documentation as is required with individualized career services and follow-up services. However, there are several data fields that require verification through staff observation and applicant attestation, followed by a program and enrollment note into Arizona Job Connection (AJC). Basic career services are intended to be “one-time” services, not a continuum of services based on a career plan.

Basic career services may include at a minimum:

1. Determination of whether the individual is eligible to receive assistance from the Adult, Dislocated Worker, or Youth programs;
2. Outreach, intake (including identification of unemployment insurance claimants likely to exhaust benefits through the state’s Reemployment Service and Eligibility Assessment program), and orientation to information and other services offered by ARIZONA@WORK Northeastern Arizona. Workforce Specialists must provide individuals the webpage link to apply for Temporary Assistance for Needy Families, as appropriate. Individuals may apply online at <https://des.az.gov/services/basic-needs/financial-support/cash-assistance>
3. Initial assessment of skill levels to determine literacy, numeracy, and English language proficiency, as well as the use of other assessment tools to determine aptitudes, abilities (including skills gaps), and support service needs;
4. Labor exchange services, including job search, placement assistance and career counseling, when needed. This includes providing information on nontraditional employment and in-demand industry sectors and occupations as defined by the Northeastern Arizona Local Workforce Development Board;
5. Provision of referrals to, and coordination of, activities with programs and services within the ARIZONA@WORK Northeastern Arizona service delivery system and, when appropriate, other workforce development programs. This includes co-enrollments in more than one program. The Adult and Dislocated Worker program

Workforce Specialists must collaborate and work closely with partner programs to address the needs of these co-enrolled customers;

6. Provision of workforce and labor market information, including information relating to local, regional, and national labor market areas, such as:
 - a. Job vacancy listings in labor market areas,
 - b. Information on job skills necessary to obtain the vacant jobs listed, and
 - c. Information relating to local occupations in demand and their earnings, skills requirements, and opportunities for advancement;
7. Provision of performance information and program cost information on eligible providers of training services by program and provider type;
8. Provision of information, in usable and understandable format and languages, about how the ARIZONA@WORK Northeastern Arizona is performing on local performance accountability measures, as well as any additional performance information related to the ARIZONA@WORK system;
9. Provision of information, in usable and understandable format and languages, about the availability of supportive services or other programs that provide assistance and appropriate referrals to those services and programs including, but not limited to:
 - a. Child care,
 - b. Child support services,
 - c. Medical and child health assistance (KidsCare -Arizona's Children's Health Insurance Program(CHIP) through the Arizona Health Care Cost Containment System (AHCCCS),
 - d. Benefits through the Supplemental Nutrition Assistance Program (SNAP) Program,
 - e. Assistance through the Temporary Assistance for Needy Families (TANF) program and other support services and transportation provided through TANF,
 - f. Assistance through the earned income tax credit;
 - g. Housing counseling and assistance services sponsored through the U.S. Department of Housing and Urban Development (HUD); and
 - h. Other supportive services, including transportation.
10. Provision of information regarding filing claims for unemployment insurance benefits, including meaningful assistance to individuals seeking assistance in filing a claim; and
11. Assistance in establishing eligibility for programs of financial aid assistance for training and education programs not provided under WIOA.

B. Individualized Career Services

Individualized career services must be made available to eligible adults and dislocated workers accessing the ARIZONA@WORK Northeastern Arizona service delivery system. It is determined that additional services beyond basic career services are required to obtain or retain employment; however, not all individuals will receive all services.

Individuals must be enrolled in either the Adult or Dislocated Worker Program in order to receive individualized career services.

Documentation must be collected for priority of service for individuals enrolled in the ARIZONA@WORK Northeastern Arizona Adult Program. Individualized career services *must* include:

1. Comprehensive and specialized assessments of the skills levels and service needs of adults and dislocated workers, which may include diagnostic testing such as:
 - a) Arizona Career Readiness Credential (ACRC) prepares job seekers for success by demonstrating their proficiency in seven skill areas that are relevant to every occupation, industry and career pathway across the state. The following is a list of the seven skills areas:
 - i. Applied Mathematics;
 - ii. Reading for Information;
 - iii. Workplace Data and Graphics;
 - iv. Communicating Effectively;
 - v. Teamwork and Collaboration;
 - vi. Professionalism

and in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals, and the use of other specialized assessment tools, as determined by the LWDA.

Comprehensive and specialized assessment of skills levels must be provided prior to other individualized career services and training services as the results are used to confirm if an individual is Basic Skills deficient, which in turn is used to determine the participant's priority of service. Once the comprehensive assessment has been completed, other individualized career services and training services may be provided.

The possession of a college degree by an individual seeking services does not preclude the Workforce Specialists from administering comprehensive and specialized assessments. Workforce Specialists must determine, based on their interviews with each individual, what the best assessment tools are to be used to determine the level of assistance needed and whether enrollment into either the Adult or Dislocated Worker Programs will benefit the individual in achieving their career goals.

The results of the assessment interviews and the agreed upon steps to be taken by the individual must be entered into documentation and entered into case notes.

2. Development of an Individual Employment Plan (IEP), which is an ongoing strategy

to identify the employment goals, appropriate achievement objectives, associated strategies, and appropriate combination of services for the participant to achieve his or her employment goals, including information about eligible training providers and programs from the Eligible Training Provider List (ETPL).

All services provided to a client must be entered on the IEP and Case Notes in Arizona Job Connection (AJC), and must be updated whenever there is a change made;

3. Group and/or individual counseling and mentoring;
 4. Career planning;
 5. Case management (must be included in the participant's Service and Training Plan);
 6. Short-term pre-vocational services, including development of learning skills, communication skills, punctuality, personal maintenance skills and professional conduct services to prepare individuals for unsubsidized employment or training. In some instances, pre-apprenticeship programs may be considered as short-term pre-vocational services;
 7. Internships and Work Experiences (WEX) linked to careers.
 - a. An internship or work experience is a planned learning experience that takes place in a workplace for a limited period of time. Internships and work experiences can be paid or unpaid;
 - b. Labor standards apply to internships and work experiences where there is an employee/ employer relationship, as defined by the Fair Labor Standards Act;
 - c. Transitional jobs are a type of work experience that is wage-paid and subsidized for those individuals with barriers to employment who are Chronically unemployed or have an inconsistent work history. (See Chapter 500 Training Services)
- NOTE:** Adult and Dislocated Worker Program providers may use up to 10 percent of their combined total adult and dislocated worker allocations for transitional jobs.
- d. Transitional jobs must be combined with comprehensive career services and supportive services.
8. Workforce preparation activities that help an individual acquire a combination of basic skill necessary for the successful transition into and completion of postsecondary education, training, or employment;
 9. Financial literacy services;
 10. Out-of-area job search assistance and relocation assistance; and
 11. English language acquisition and integrated education and training programs

C. Follow-up Services

Follow-up services are provided to clients *who have obtained unsubsidized employment and exit the ARIZONA@WORK Northeastern Arizona Adult or Dislocated Worker program*. The purpose of Follow-Up services is to promote job

retention, wage gains, and career progress.

1. Follow-up services may include:
 - a. Additional career planning and counseling;
 - b. Contact with the participant's employer, including assistance with work related problems that may arise;
 - c. Peer support groups;
 - d. Information pertaining to additional educational opportunities; and
 - e. Referral to support services available in the participant's community.
2. Follow-up services **must** be made available to clients who exit the ARIZONA@WORK Northeastern Arizona Adult or Dislocated Worker program into unsubsidized employment for a minimum of 12 months following the first day of employment. *Follow-up services do not extend the date of exit in performance reporting.*
3. The participant's case file notes must contain documentation substantiating that follow-up services were offered. This may include, but is not limited to, a letter, an e-mail, or case notes based on a telephone or face-to-face conversation. A minimum of three attempts must be made to contact the individual to offer follow-up services. Adult or Dislocated Worker program clients may decline follow-up services if they so choose.
4. Re-enrollment into ARZONA@WORK Northeastern Arizona Adult or Dislocated Worker program is **required** *when it becomes necessary during the follow-up period to utilize program services beyond those available in follow-up services.*

Note: Supportive Services must not be provided after the program participant exits the program. If the individual is in need of supportive services, the individual must be re-enrolled in the Adult or Dislocated Worker Program.

103.2 TRAINING SERVICES

Training services are available to assist individuals in gaining the skills and knowledge to obtain and retain employment. Training is administered by public and private sector employers, as well as institutions of higher education, registered apprenticeships, and other public and private providers of programs of training services. The training must be directly linked to the employment opportunities in either Northeastern Arizona or in another local area where the participant is willing to relocate.

For more information on training services, please see the [Training Service Policy, Section 500](#).

104 REGISTRATION, ENROLLMENT, AND DATA ENTRY

There is an important distinction between **registration** and **enrollment**.

- A. A **registration** in AJC occurs when an adult or dislocated worker creates an account that includes complete data, demographics and work history. However,

documentation or verification of income is not required.

- B. Registration in AJC **must** occur when an adult or dislocated worker has taken action that demonstrates an intent to use program services and who meets specific reporting criteria for the program. Intent is demonstrated by individuals who:
1. Provide identifying information;
 2. Use the self-service system;
 - a. The self-service system includes individuals who independently access any workforce development system program's information either in a physical location, such as an ARIZONA@WORK Northeastern Arizona job center resource room or partner agency or remotely via use of electronic technologies.
 - b. Virtual services that provide a level of service beyond independent job search or information seeking would *not* qualify as self-service.
 3. Receive information-only services or activities;

Informational-only services include providing readily available information that does not require assessment by a staff member of the individual's skills, education, and career objective. Examples of informational services include providing:

- a. Labor market information;
- b. Unemployment rates;
- c. Information on businesses that are hiring or reducing their workforce;
- d. Information on high growth industries/occupations; and
- e. Referrals other than referrals to employment.

- C. **Enrollment** into either the Adult or Dislocated Worker program ***must occur when an individual requires services beyond self-service, or services beyond simply providing the individual information.*** The program enrollment will depend on the individual's eligibility (see Section 208).

It is *not* acceptable to delay registration or enrollment in AJC until individualized career services or training services are determined to be necessary and subsequently provided.

Income-related documents must be verified for individuals seeking enrollment into the Adult Program to determine priority of service prior to the provision of individualized career or training services. Verification of income-related documents is *not* required for basic career services or for individuals seeking enrollment into Dislocated Worker Program.

1. Enrollments are "Pending" status in AJC until they are approved by designated program staff. Pending enrollments must be approved promptly and accurately to ensure expediency of services.

2. Enrollments are pending in AJC until they are approved by designated staff. Pending enrollments must be approved within 30 days to ensure expediency of services.
3. All pending enrollments must be resolved no later than 15 days from initial eligibility determination. The service provider must run the WIOA No Participation report in AJC to monitor the timeliness of the pending client record. Extenuating circumstances must be noted in case notes to extend the enrollment beyond the 15 days. No extension is to be made beyond 30 days from date of initial eligibility determination.

NOTE: When pending enrollments are not approved within 30 calendar days, the AJC system requires that the individual's eligibility be re-determined. This includes collecting new/updated verification documentation for eligibility determination

- D. Services are to be reported under the category of service listed in the [AJC Service Dictionary](#): basic career service, individualized career service or training service.
- E. Transactions relating to Adult and Dislocated Worker program-provided activities and services must be entered or updated in AJC promptly and accurately to ensure expediency of services.
- F. Providers of Adult and Dislocated Worker program services *must run the AJC Report 8 – Case Manager Reports/Local Workforce Area – on a monthly basis* to ensure timely follow-ups and accurate data recording.
- G. The **Arizona Address Confidentiality Program (ACP)** is a program that helps victims of domestic violence, sexual offenses, and/ or stalking. The Secretary of State's ACP Office issues a substitute address to be used instead of the person's home, work, and school address. The ACP office accepts all first class, registered and election mail for the participant and forwards to her/ his real address at no cost.
 1. **For Arizona Address Confidentiality Program (ACP) participants**, providers of Adult and Dislocated Worker program services *must accept and use the substitute address in AJC and in all other documents that contain the participant's address.*
 2. Adult and Dislocated Worker Program service provider staff must verify the individuals ACP participation by:
 - a. Contacting the Secretary of State's ACP Office; or
 - b. Viewing the ACP authorization card. When possible make a copy of the ACP authorization card for the participant's file.

105 CO-ENROLLMENT

Co-enrollment occurs when a participant is simultaneously enrolled in more than one

ARIZONA@WORK Northeastern Arizona required partner program. Workforce Specialists must work closely to address the needs of co-enrolled participants and ensure services are made available to eligible individuals who are referred by partner programs based on priority of service criteria.

Programs that the Adult and Dislocated Worker Programs may have co-enrollments with include:

- A. Migrant Seasonal Farmworker (MSFW) under Title I of WIOA.
- B. Jobs Program (TANF Work Program)
- C. Supplemental Nutrition Assistance Employment and Training (SNA E&T)
- D. Trade Adjustment Assistance (TAA)
NOTE: Individuals who are dislocated from an employer that is certified for TAA *must be co-enrolled in the Dislocated Worker Program*
- E. Programs under the Second Chance Act

Currently incarcerated individuals who are soon-to-be released from prison, or recently released prisoners may be enrolled in programs under the Second Chance Act. These programs are still being developed and further guidance will be provided as it becomes available.

- F. Title II
- G. Vocational Rehabilitation
- H. Other employment related programs.

NOTE: Participants of the ARIZONA@WORK Northeastern Arizona Youth Program who have continued to be co-enrolled in either the Adult or Dislocated Worker programs or who have been adopted and are now adults must remain eligible for WIOA Adult or Dislocated Worker Program services and do not require re-determination of eligibility.

106 PROGRAM EXITS

Participants who have not received a service funded by the Adult or Dislocated Worker program or a partner program (See Section 108) for 90 consecutive calendar days and are not scheduled for future services are considered to have exited the program.

- A. Program Exit Requirements

The **date of exit** is the last date a service was provided to a participant. *Case notes in AJC must include the reason for exit and documentation may be uploaded into AJC.* If the documentation is not uploaded into AJC, the documentation must be retained in the

participant's program file.

NOTE: These are reasons for exit, and only apply if the event happens prior to exit. So if the individual becomes sick after exiting the program, the participants is not excluded from performance.

1. The participant will not be counted in performance if they exit the program for any of the following reasons:
 - a. Deceased – participant died during participation in either the WIOA Adult or Dislocated Worker program;
 - b. Institutionalized – participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain institutionalized
 - c. Health/Medical – participant is receiving medical treatment that precludes entry into unsubsidized employment or continued participation in a WIOA program. This does not include temporary conditions expected to last for less than 90 days;
 - d. Entered into Active Military duty-participant who is a reservist and has been called to active duty or participant enlists and reports for active duty which prevents participation in WIOA Title I-B Adult or Dislocated Worker programs; or
2. **When a participant receives services from multiple programs,** the most recent service end date is the date of exit. Follow-up services provided to participants *do not* extend the exit date.
3. If an individual retires, retirement must be recorded in AJC as the reason for the exit for reporting purposes. However, the individual is not excluded from the performance measures.

B. Gaps in Service

A participant in the Adult or Dislocated Worker program may be placed in a “gap in service” when a situation arises that will temporarily prevent program participation for greater than 90 consecutive calendar days. The gap in service will provide time for clients to address barriers to continued participation without exiting the program. In addition to scheduling the participant for a gap in service, the participant must have an in-progress service open in the Service and Training plan in AJC to extend the program participation.

1. **A gap in service extends a participant's exit date for 90 calendar days from the time he or she is placed into the gap.** The gap in service must be related to:
 - a. A delay before the beginning of training;
 - b. A health/medical condition, or providing care for a family member with a health/medical condition; or
 - c. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.
2. A gap in service may be extended for an additional 90 consecutive calendar

days (for a total of 180 consecutive calendar days) to resolve the issue that is preventing a participant from completing program services. The extended gap in service must be related to:

- a. A health/medical condition, or providing care for a family member with a health/medical condition; or
 - b. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.
3. All gaps in service must be referenced in case notes detailing the reason for the gap in service.

107 ADULT PROGRAM PRIORITY OF SERVICE

ARIZONA@WORK Northeastern Arizona observes the priority of service provision for all Adult program formula funds for individualized career and training activities.

Priority for individualized career services and training services funded with Title I Adult Program funds must be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient in the local area.

- A. **Priority of service is not an eligibility criterion for the Adult Program**, but it is the means to ensure an emphasis on providing services to these populations.
- B. Low income status will be established based on the criteria in the [Adult/Dislocated Worker State Policy Section 102.02\(A\)](#).
- C. Basic skills deficient status will be established based on the criteria in the [Adult/Dislocated Worker State Policy Section 102.02\(B\)](#).
- D. Priority of service does not necessarily mean that these services only may be provided to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. Employed individuals who earn a wage below the established Self-Sufficiency Wage for Adults as documented on the most current Lower Living Standards Income Levels for Northeastern Arizona as posted on the [DES Policy Resource page](#).

107.1 ORDER OF PRIORITY

Priority of service is to be determined in order, by the following groups:

- A. A veteran or an eligible spouse of a veteran who:
 1. Is currently receiving public assistance, or has received public assistance in the last 6 months,
 2. Is low-income, as defined by [Section 101.02\(A\) of the Arizona DES WIOA Policy Manual](#) or
 3. Is basic skills deficient, as defined in [Section 101.02\(B\) of the Arizona DES WIOA Policy Manual](#)
- B. A non-veteran who:

1. Is currently receiving public assistance, or has received public assistance in the last 6 months,
 2. Is low-income, as defined in Section 102.02(A) of the Arizona DES WIOA Policy Manual as or
 3. Is basic skills deficient, as defined in Section 102.02(B) of the Arizona DES WIOA Policy Manual.
- C. A veteran or an eligible spouse of a veteran who is not included in WIOA priority groups identified in 102.01(A)(1) or (A)(2) as provided in the Arizona DES WIOA Policy Manual
- D. A non-veteran who is not included in WIOA priority groups identified in 102.01(A)(1) or (A)(2) of the Arizona DES WIOA Policy Manual.

107.2 LOW INCOME

An adult is defined as low-income when he or she is:

1. Currently receiving or has received public assistance in the last six months, either solely or as a member of a family;
2. A member of a family whose total family income does not exceed the higher of either the poverty line or 70 percent of the Lower Living Standard (LLSIL);
3. A homeless individual, as defined in 42 U.S.C. 1404e-2(6) of the Violence Against Women Act of 1994, or 42 U.S.C. 1143a(2) of the McKinney-Vento Homeless Assistance Act; or
4. An individual with a disability whose own income meets the income requirement of Section 205(A)(2) but is a member of a family whose income does not meet this requirement.

107.3 BASIC SKILLS DEFICIENT

An adult is basic skills deficient when he or she is unable to

1. Compute or solve problems; or
2. Read, write, or speak English at a level necessary to function on the job, in his or her family. Individuals identified as English Language Learners meet the definition of Basic Skill Deficient, and must be included in the priority populations.

107.4 DOCUMENTING LOW-INCOME STATUS FOR PRIORITY OF SERVICE

ARIZONA@WORK Northeastern Arizona staff must properly document low-income status when an adult is enrolled in the WIOA Title IB Adult program and meets any one criterion in Section: 205(A).

All attempts to gather this information, including calls, letters, and e-mail messages to the participant must be documented in AJC Case Notes.

Documentation related to income verification as outlined in *WIOA Eligibility and*

Verification Checklist (Exhibit 200A) must be collected and uploaded into AJC. ARIZONA@WORK Northeastern Arizona staff and providers must retain original documentation in each participant's program file for a period no earlier than six months from date of completion of the particular forms.

Military earnings are not included when calculating income for veterans or transitioning service members for priority of service.

ARIZONA@WORK Northeastern Arizona staff and providers must request medical documentation for program eligibility determination when an individual with a disability requests accommodations or the individual is counted as a family of one. All medical information must be kept in a sealed confidential envelope separate from the files of eligible applicants, registrants, and participants.

When an individual with a disability does not want to provide medical documentation to substantiate a disability, the individual must not be counted as a person with a disability.

When a verification document cannot be obtained, the **WIOA Applicant Statement (Exhibit 200C)** may be accepted only as a last resort. The form must contain the signatures of the participant and a witness.

Every attempt used to gather information for verification must be documented in AJC Case Notes. **The WIOA Applicant Statement (Exhibit 200C) must be uploaded into AJC.**

Individuals who are participants of the following programs may automatically meet priority of service requirements as they are considered low income and require no further income verification if the individual provides acceptable documentation. Participation must be documented by the Workforce Specialist and entered into the participant's case file.

Temporary Assistance for Needy Families (TANF)

TANF documentation must be current and indicate the individual is receiving, or is a member of a family who is receiving or has received in the past six months, TANF payments at the time of application to the WIOA Adult program.

Supplemental Nutrition Assistance Program (SNAP)

SNAP documentation must be current and indicate the individual is receiving, or is a member of a family who is receiving or has received in the past six months, SNAP payments at the time of application to the WIOA program.

Supplemental Security Income (SSI)

SSI documentation must be current and indicate the individual is receiving, or has received SSI in the past six months and indicate that payments were made to a single recipient. The individual applying to WIOA must be the recipient at the time of application to the Adult Program in order to be considered as a family of one.

Refugee Cash Assistance (RCA)

RCA documentation must be current and indicate the individual is receiving, or has received RCA in the past six months and indicate that payments were made to a single recipient. The

individual applying to the Adult Program must be the recipient at the time of application to the Adult Program in order to be considered as receiving public assistance.

107.5 WIOA Title IB Adult Program PRIORITY GROUPS

Priority of service is to be determined, in order, by the following priority groups:

- A. A veteran or an eligible spouse of a veteran who:
 - 1. Is currently receiving public assistance, or has received public assistance in the last six months,
 - 2. Is low-income, as defined in Section 102.03(A), or
 - 3. Is basic skills deficient, as defined in Section 102.03(B). 4. Eligible Spouse means the spouse of any of the following:
 - a. A person who died of a service-connected disability.
 - b. Any member of the Armed Forces serving on active duty who at the time of application for the priority is listed, as one of the following;
 - i. Missing in action;
 - ii. Captured in line of duty by hostile force; iii. Forcibly detained or interned in line of duty by foreign government or power;
 - c. Any veteran who has a total disability resulting from a service-connected disability.
 - d. Any veteran who died while a disability as evaluated was in existence.
- B. A non-veteran who:
 - 1. Is currently receiving public assistance, or has received public assistance in the last 6 months,
 - 2. Is low-income, as defined in Section 204.2; or
 - 3. Is basic skills deficient, as defined in Section 204.3
- C. A veteran or an eligible spouse of a veteran who is not included in WIOA priority groups identified in 102.03(A) or 102.03(B) below.
- D. A non-veteran who is not included in WIOA priority groups identified in 102.03(A) or 102.03(B) below.

108 PROGRAM ELIGIBILITY

Individuals must meet eligibility requirements for either the Adult Program or the Dislocated Worker Program in order to receive ARIZONA@WORK Northeastern Arizona individualized career and training services.

There are no geographical boundaries in providing services to individuals in any WIOA Title IB program. Individuals may apply for services at any ARIZONA@WORK Job Center in Arizona. ARIZONA@WORK Northeastern Arizona Adult and Dislocated Worker Program providers will not create policies that prohibit serving individuals who live outside their local area.

108.1 WIOA Title I-B ADULT ELIGIBILITY

An individual is eligible for the ARIZONA@WORK Northeastern Arizona Adult program when he or she:

- A. Is 18 years of age or older;
- B. Is a citizen or national of the United States, or a lawfully admitted permanent resident alien, refugee, asylee, parolee, or other immigrant authorized by the United States Attorney General to work in the United States; and
- C. Meets Section 3 of the Military Selective Service Act, as amended at 50 U.S.C. Appendix 453, to register for Selective Service.
 - 1. The ARIZONA@WORK Northeastern Arizona Adult Program service provider is responsible for determining Selective Service status of males prior to program enrollment. For guidance on determining Selective Service status, refer to Section 109 of this Policy.

108.2 WIOA TITLE IB DISLOCATED WORKER ELIGIBILITY

Eligibility of a dislocated worker is determined at the time of enrollment. This determination remains intact for the period of participation in the Dislocated Worker program. A dislocated worker is an eligible adult 205.01 *who meets one of the following four categories:*

- A. **Category I** includes an individual (non-retiree), including recently separated U.S. veterans within 48 months after discharge or release from active duty, who has been terminated through no fault of their own or laid off, or has received a notice of termination or layoff from employment; **and**
 - a. Is eligible for or has exhausted entitlement to Unemployment Insurance (UI) compensation, **or**
 - b. Has been employed for a duration sufficient to demonstrate attachment to the workforce (determined on a case-by-case basis by the LWDA), but is not eligible for unemployment compensation due to insufficient earning or having performed services for an employer that was not covered under state unemployment compensation law; **and**
 - c. Is unlikely to return to a previous industry or occupation. An individual is considered unlikely to return to a previous industry or occupation when:
 - i. Labor market information for the occupation shows a zero or negative growth rate;
 - ii. The local Chamber of Commerce, Economic Development representative, or other credible sources of regional economic information confirm the occupation or industry has shown a significant employment decline in the local labor market area;
 - iii. Employment Service confirms that, in the previous sixty days, there was a lack of job orders for that occupation to qualified job seekers, as determined

- by the Northeastern Arizona Local Workforce Development Board;
- iv. A plant closure or substantial layoff within the labor market area in the same industry or occupation has occurred in the last six months from the date of plant closure or substantial layoff;
- v. The individuals have been actively seeking but are unable to find employment in their previous industry or occupation for a period of 90 days or more from employment separation; **or**
- vi. A person is laid off from a job due to lack of certification.
- vii. The separating service member is separating from the Armed Forces with a discharge that is anything other than dishonorable who qualifies for dislocated worker activities when he or she:
 - a. Has received a notice of separation, a DD-214 from the Department of Defense, or other documentation showing a separation or imminent separation from the Armed Forces to satisfy the termination or layoff part of the dislocated worker eligibility criteria in WIOA sec. 3(15)(A)(i);
 - b. Qualifies for the dislocated worker eligibility criteria on eligibility for or exhaustion of unemployment compensation in WIOA sec. 3(15)(A)(ii)(I) or (II); and
 - c. Meets the dislocated worker eligibility criteria that the individual is unlikely to return to a previous industry or occupation in WIOA Section 3(15)(A)(iii).

Note: Veterans do not automatically qualify as dislocated workers under this category.
Only recently separated service members who have been released within the past 48 months from active military, naval or air duty, and service members who have an imminent separation date.

Reemployment Services and Eligibility Assessment (RESEA) eligibility is **not** an automatic qualifier for the Dislocated Worker program.

- B. **Category II** includes an individual who:
 - a. Has been terminated through no fault of their own or laid off, or has received a notice of termination or layoff from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise.
 - b. **NOTE: A substantial layoff** is defined as an extended mass layoff that either involves 500 or more workers or in which the number of separations is at least one-third of the employment prior to the separation, excluding those employees that work less than 20 hours a week (U.S. Bureau of Labor Statistics); **or**
 - c. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; **or**
 - d. For purposes of eligibility to receive services other than training services, career services, or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close.
- C. **Category III** includes an individual who was self-employed (including employment as a farmer, rancher, or fisherman) but is unemployed as a result of general economic conditions in the

community in which the individual resides or because of natural disasters.

D. Category IV includes an individual who:

- a. Is a displaced homemaker (an individual who has been providing unpaid services to family members in the home);
- b. Is the spouse of a member of the Armed Forces on active duty, as defined in
- c. U.S.C. Title 10 Section 101 (d) (1), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or
- d. Is the spouse of a member of the Armed Forces on active duty, or who has been discharged from the military, and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. A person is considered underemployed if they are employed either full or part-time, whose current annualized wage does not exceed the highest of either:
 - a. 80% of their wages at the date dislocation; **or**
 - b. The individual's earned wages are at or below the self-sufficiency threshold as identified in the **ARIZONA@WORK Northeastern Arizona Local Workforce Development Plan**.

108.3 WIOA DISLOCATED WORKER VERIFICATION OF LAYOFF OR TERMINATION

A. Methods to verify layoff include:

1. verification from the employer;
 2. a Worker Adjustment and Retraining Notification Act (WARN) notice;
 3. a public announcement with a follow-up cross-match with the Unemployment Insurance system; or
 4. a Rapid Response list showing names of affected employees.
- B.** When gathering verification documentation becomes a hardship, the [WIOA Title IB Applicant Statement \(WIA-1027A\)](#) is acceptable.
- C.** A list of acceptable documentation that satisfies verification requirements for veterans and spouses of veterans can be found in the [WIOA Title IB Eligibility Checklist \(WIA- 1027B\)](#).
- D. The term “terminated”** *does not* include workers who were terminated for cause, left voluntarily, or voluntarily retired. *The status of an individual must be determined prior to providing services.*
- E.** If an individual is fired for cause by their employer or quits their job they are not considered to be terminated at no fault of their own.
- F.** Individuals who accept early “forced” retirement as a part of reduction in workforce are considered terminated at “no fault of their own” and must meet other Dislocated Worker Program eligibility requirements.
- G.** A termination is a permanent situation, where the employer does not plan on rehiring the individual. If an employee is issued a written notice of termination with a possibility of a recall at some future date, the individual is not eligible. However, a layoff notice for a period of twenty-six or more weeks is considered terminated for the purposes of determining eligibility.
- H.** Individuals who are likely to remain with the employer through the layoff, or

those who are retiring and leaving the workforce instead of seeking new employment, are not considered dislocated workers.

108.4 INTERIM EMPLOYMENT

An otherwise eligible dislocated worker remains eligible if, prior or during participation in the dislocated worker program, interim employment is obtained for the purpose of income maintenance. **Interim employment** is defined as employment that is accepted by the individual for the purpose of transitory income prior to participation in individualized career services or training services with the intention of ending such employment at the completion of the individualized career services or training services. Earnings from interim employment must not be more than:

- i. 80 % of their wages at the date of dislocation; or
- ii. The self-sufficiency threshold identified in the ARIZONA@WORK Northeastern Arizona Local Workforce Development Plan.

NOTE: Documents uploaded into AJC must show why the individual's current employment is considered interim employment. If documentation is not uploaded into AJC, the documentation must be retained in the participant's program file.

109 SELECTIVE SERVICE REGISTRATION REQUIREMENTS

- A. **Ensuring Selective Service Compliance in the Public Workforce System:** In order to participate in a program established by or receiving assistance under Title I of WIOA, all males born on or after January 1, 1960 must present documentation showing compliance with the Selective Service registration requirement.
- B. **Registration Requirements for Males Under 26:** Before being enrolled in WIOA Title I-funded services, all males who are not registered with the Selective Service and have not reached their 26th birthday must register through the Selective Service website at www.sss.gov. If a male turns 18 while participating in any applicable services, registration with Selective Service must be completed no later than 30 days after he becomes 18 in order to continue to receive WIOA Title I-funded services. Staff is required to obtain proof of registration and uploaded into AJC and document in AJC case notes. If a man under the age of 26 refuses to register with the Selective Service, WIOA Title I-funded services must be suspended until he registers.
- C. **Registration Requirements for Males 26 Years and Over:** Before enrolling in WIOA Title I-funded services, all males, 26 years of age or older, must provide documentation of compliance with the Selective Service registration requirement. Individuals who did not register for the Selective Service or who cannot provide any of the documentation listed in Section 3 must obtain a Status Information Letter from Selective Service indicating whether he was required to register. The Request for Status Information Letter form can be accessed

at <http://www.sss.gov/PDFs/infoform.pdf> and the instructions can be accessed at <http://www.sss.gov/PDFs/instructions.pdf>. The individual will need to describe, in detail, the circumstances that prevented him from registering (e.g., hospitalization, institutionalization, incarceration, military service) and provide documentation of those circumstances. The documentation should be specific as to the dates of the circumstances.

If the Status Information Letter indicates that an individual was not required to register for the Selective Service, then he is eligible to enroll in services authorized or funded by Title I of WIOA. If the Status Information Letter indicates that the individual was required to register and now cannot because he is 26 or older, he is presumed to be disqualified from participation in WIOA Title I-funded activities and services until it can be determined that his failure to register was not knowing and willful. All costs associated with grant-funded services provided to non-eligible individuals may be disallowed.

D. Determining Knowing and Willful Failure to Register:

If the individual was required but failed to register with the Selective Service, the individual may only receive services if they establish by a preponderance of the evidence that the failure to register was not knowing and willful. The grantee, subgrantee, or contractor that enrolls individuals in WIOA Title I-funded activities, and is thereby authorized to approve the use of WIOA Title I grant funds, is the entity responsible for evaluating the evidence presented by the individual and determining whether the failure to register was a knowing and willful failure.

Evidence presented may include the individual's written explanation and supporting documentation of his circumstances at the time of the required registration and the reasons for failure to register. The individual should be encouraged to offer as much evidence and in as much detail as possible to support his case.

The following are examples of documentation that may be of assistance in making a determination in these cases:

1. Service in Armed Forces. Evidence that a man has served honorably in the U.S. Armed Forces such as DD Form 214 or his Honorable Discharge Certificate. Such documents may be considered sufficient evidence that his failure to register was not willful or knowing.
2. Third Party Affidavits. Affidavits from parents, teachers, employers, doctors, etc. concerning reasons for not registering, may also be helpful to grantees in making determinations in cases regarding willful and knowing failure to register.

In order to establish consistency regarding the implementation of the requirement, grantees should consider the following questions when determining whether a failure to register is knowing and willful.

In determining whether the failure was “knowing,” the authorized organization should consider:

- Was the individual aware of the requirement to register?
 - If the individual knew about the requirement to register, was he misinformed about the

applicability of the requirement to him (e.g., veterans who were discharged before their 26th birthday was occasionally told that they did not need to register)?

- On which date did the individual first learn that he was required to register?
- Where did the individual live when he was between the ages of 18 and 26?
- Does the status information letter indicate that Selective Service sent letters to the individual at that address and did not receive a response?

In determining whether the failure was “willful”, the authorized organization should consider:

- Was the failure to register done deliberately and intentionally?
- Did the individual have the mental capacity to choose whether or not to register and decided not to register?
- What actions, if any, did the individual take when he learned of the requirement to register?

If an authorized organization determines it was not a knowing and willful failure and the individual is otherwise eligible, WIOA services may be provided. If the authorized organization determines that evidence shows that the individual’s failure to register was knowing and willful, WIOA services must be denied. Individuals denied services must be advised of available WIOA grievance procedures. Authorized organizations must keep documentation related to evidence presented in determinations related to Selective Service.

Northeastern Arizona Innovative Workforce Solutions will request a Status Information Letter from a potential participant before making a determination as to whether the participant knowingly and willfully failed to register for selective services. prior to enrolling the participant into a Title 1 program. The Status Information letter in conjunction with the **TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 11-11, Change 2**, will assist in evaluating the evidence presented by the individual.

**Northeastern Arizona Local
Workforce Development
Board (Approval Authority)**

201 BACKGROUND

This section provides policy and procedures for the ARIZONA@WORK Northeastern Arizona Youth Program to use in providing services to WIOA Title IB Youth Program participants. The Youth Program provides services to youth with barriers to employment, with a special focus on supporting the educational and career success of out-of-school youth.

The WIOA Title IB Youth Program provides a comprehensive array of services, including career exploration and guidance, continued support of educational attainment, and training in in-demand industries and occupations. The program's goal is for qualified youth to obtain employment along a career pathway, enrollment in postsecondary education or a Registered Apprenticeship prior to the end of participation.

Program services are delivered by contracted providers selected by the Northeastern Arizona Local Workforce Development Board (NEAZ LWDB) and approved by the Navajo County board of Supervisors. These contracted providers are referenced in this policy as "Youth Program Providers".

202 AUTHORITY

- Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L. 113-128)
- Code of Federal Register 20 Part 681
- Training and Employment Guidance Letter (TEGL) 9-00
- Training and Employment Guidance Letter (TEGL) 28-11
- Training and Employment Guidance Letter (TEGL) 5-12
- Training and Employment Guidance Letter (TEGL) 5-14
- Training and Employment Guidance Letter (TEGL) 23-14
- Training and Employment Guidance Letter (TEGL) 8-15
- Training and Employment Guidance Letter (TEGL) 21-16
-

203 PROGRAM REQUIREMENTS

ARIZONA@WORK Northeastern Arizona Youth Program providers must ensure the Youth Program prepares participants to meet education and career goals. The Youth Program provider must provide:

- Preparation for postsecondary education and training opportunities, including Registered Apprenticeship Programs;

- Strong linkages between academic instruction and occupational education;
- Preparation for unsubsidized employment opportunities along career pathways; and
- Strong connections to employers, including small employers, in-demand industry sectors, and occupations of the local and regional labor markets.

203.1 LINKAGES TO COMMUNITY PARTNERS

The Youth Program provider must provide linkages to community partners to:

- A. Ensure that parents, youth participants, and members of the community with experience in youth programs are involved in the design and implementation of the WIOA Title IB Youth Program;
- B. Make opportunities available to individuals who have successfully participated in the Youth Program to volunteer and provide assistance to participants in the form of mentoring, tutoring and/or other services;
- C. Provide appropriate connections between the Youth Program and the ARIZONA@WORK Northeastern Arizona workforce delivery system that will foster participation with local youth and include:
 1. Local area justice and law enforcement officials;
 2. Local public housing authorities;
 3. Local education agencies;
 4. Local human service agencies;
 5. WIOA Title II adult education providers;
 6. Local disability-servicing agencies;
 7. Job Corps representatives;
 8. Representatives of other area youth initiatives, including those that serve the homeless and private youth initiatives;
 9. Coordination and provision of youth services;
 10. Linkages to the job market and employers;
 11. Access for eligible youth to information and the services listed in section 504 of this policy; and
 12. Other activities designed to meet the purposes of the Youth Program and youth services.

203.2 OUT-OF-SCHOOL PRIORITY

Youth Program providers must dedicate at least 75 percent of WIOA Title IB Youth Program funds to provide services for Out-of-School Youth (OSY). The provider must verify and document the youth's dropout status at the time of program enrollment. An individual who is out- of-school at the time of enrollment, and subsequently placed in any school, is an OSY for the purposes of the 75 percent expenditure requirement for out-of-school throughout his/ her participation in the program.

203.3 REFERRALS

Youth Program providers must ensure all youth who meet the eligibility criteria for the youth program receive information about the full array of services available through the partner programs that comprise ARIZONA@WORK Northeastern Arizona, eligible youth service providers, as well as referrals to appropriate training and educational programs with the capacity to serve the applicant either on a sequential or concurrent basis. In order to meet the basic skill needs and training needs of applicants who do not meet the eligibility requirements of a particular program or cannot be served by the program, each youth provider must ensure these youth are referred:

- D. For further assessment, as necessary, and
- E. To appropriate training and education programs that have the capacity to serve them either on a sequential or concurrent basis.

203.4 YOUTH SERVICES

Youth Program providers must provide Design Framework services. The providers must describe the design framework (20 CFR § 681.420) for youth services and how the required 14 program elements (See Section 505) will be provided within the design framework in the ARIZONA@WORK Northeastern Arizona Local Workforce Development Area Plan. WIOA Title IB funds may be used to provide design framework services prior to an eligibility determination.

Design Framework services include:

- A. Outreach and recruitment
- B. Intake and eligibility determination;
- C. Objective assessment
 - 1. The Youth Program provider must provide an objective assessment of the academic and occupational skill levels as well as needs and strengths of each participant to identify appropriate services and career pathways for each participant and to collect information for the Individual Service Strategy (ISS).
 - 2. A new objective assessment is not required if a partner program has completed an objective assessment with the participant in the last six months and its use is deemed appropriate by the LWDA.
 - 3. The objective assessment must include a review of:
 - a. Basic Skills (see Section 507.6);
 - b. Occupational skills;
 - c. Prior work experience;
 - d. Employability;
 - e. Interests (including interest and aptitudes for nontraditional jobs);
 - f. Supportive service needs; and

- g. Developmental needs.

D. Development of an Individual Service Strategy

The Youth Program provider must develop an Individual Service Strategy (ISS), based on the objective assessment that specifies which of the 14 program elements are necessary to assist the participant in meeting his/her educational and career goals. The objective assessment may be directly linked to one or more performance accountability measures for youth as specified in 34 CFR 463.155.

1. The ISS must include identification of appropriate career pathways including:
 - a. Educational goals;
 - b. Employment goals, including non-traditional employment, taking into consideration career planning and the results of the objective assessment; and
 - c. Appropriate achievement objectives and services for the participant.
2. The ISS is a living document and must be updated with each contact to reflect progress, status, and changes. The ISS must coincide with case notes in AJC and services.
3. ISS updates/revisions should not occur more than 90 days apart to ensure continued engagement of the participant.
4. A new ISS is not required if a partner program has completed an ISS with the participant in the last six months and its use is deemed appropriate by the NEAZ LWDB.
5. The ISS is to be reviewed and revisions to the service strategy must be documented in case notes during each contact with the Workforce Specialist (see Section 504 (E)(4)).
6. ISS must remain open in AJC until all planned services are complete.

E. Case Management

Youth Program providers must provide case management of youth. Case management uses a client-centered approach in the delivery of services designed to:

1. Prepare and coordinate the ISS for participants and ensure access to workforce development activities and supportive services;
2. Provide job and career counseling during program participation and after job placement; and
3. Provide service to participants for the amount of time necessary to enter postsecondary education and/ or unsubsidized employment. While there is no minimum or maximum time a youth can be served in the WIOA Title IB youth program, programs must link participation to the ISS and not the timing of the youth service provider contracts or program years.
4. Contact between Youth Program Workforce Specialists and program

participants is not to exceed 30 days in duration to ensure contact is maintained between the program and the participant.

F. Follow up Services

All youth participants must be provided a minimum of 12 months of follow-up services after the completion of participation (see Section 505.9).

G. The following design framework services must be added to the Service and Training Plan in the Arizona Job Connection in order to document that design framework services have been provided to the participant:

1. Eligibility determination;
2. Objective Assessment; and
3. ISS.

204 YOUTH PROGRAM ELEMENTS

- A. The contracted providers must make 14 youth program elements available to participants; however the provider does not have to provide all 14 program elements with WIOA Title IB funds when resources are leveraged through partner programs that already provide readily available resources. Providers are encouraged to partner with existing local, State, or national entities that can provide program element(s) at no cost, as described at 20 CFR § 681.460(c).
- B. Youth Program providers must ensure there is an agreement in place with a partner organization to ensure a program element is offered when a specific element is not offered utilizing allocated ARIZONA@WORK Northeastern Arizona Youth Program funds. Providers must also ensure the element is closely connected and coordinated with the ARIZONA@WORK Northeastern Arizona Youth Program.
- C. The 14 program elements must not be provided to participants prior to eligibility determination.
- D. Justification must be entered into case notes providing sufficient reason as to why the particular element was selected, including expected outcomes resulting from participation.

204.1 PROGRAM ELEMENT 1: TUTORING, STUDY SKILLS TRAINING, INSTRUCTION, DROP OUT PREVENTION SERVICES

Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements of secondary school diploma or High School Equivalency (HSE), including certificate of attendance or similar documentation for individuals with a disabilities), or a recognized postsecondary credential. Tutoring, study skill can be provided to individuals who have a high school diploma or HSE and are in postsecondary education.

- A. Tutoring, study skills, instruction that lead to a high school diploma are reported under this element. These services include:
 - 1. Providing academic support;
 - 2. Helping youth identify areas of academic concern;
 - 3. Assisting overcoming learning obstacles; and
 - 4. Providing tools and resources to develop learning strategies.

Secondary school dropout prevent strategies that lead to a high school diploma are also reported under this element. This service is provided to individuals who are still in school. Secondary dropout prevention strategies include services and activities that keep a young person in-school and engaged in formal learning/ or training activity. Strategies, include but are not limited to:

- 1. Tutoring;
- 2. Literacy development;
- 3. Active Learning experiences;
- 4. After-school opportunities; and
- 5. Individualized instruction.

204.2 PROGRAM ELEMENT 2: ALTERNATIVE SECONDARY SCHOOL SERVICES OR RECOVERY SERVICES

Alternative secondary school services and dropout recovery services are provided with the goal of helping youth to re-engage and persist in education that leads to the completion of a recognized credential.

- B. Alternative secondary school services, such as basic education skills training, individualized academic instruction, and English as a Second Language, are provided to assist youth who have struggled in traditional secondary education.
- C. Dropout recovery services are provided to youth who have dropped out of school: Services include credit recovery; counseling; and educational plan development.

204.3 PROGRAM ELEMENT 3: WORK EXPERIENCES

Work experiences (WEX) are planned, structured learning experiences that take place in a workplace for a limited period of time. WEX provide the youth participant an opportunity for career exploration and skill development.

- D. Work Experience Requirements
 - 1. WEX are:
 - a. Paid or unpaid;
 - b. Designed to provide youth with opportunities for career exploration and skill development; and
 - c. Allowed to take place in the private or public sector.
 - 2. Labor standards apply in any WEX where an employee/employer relationship exists, as defined by the Fair Labor Standards Act or applicable state laws.

3. WEX must have an academic and occupational component that encompasses contextual learning and is intended to help the participant learn information necessary to work in specific industries or occupations.
 - a. The academic and educational component may occur concurrently or sequentially with the WEX.
 - b. The academic and educational component may occur inside or outside of the work site.
 - c. The academic and educational component may be provided by the WEX provider or may be provided separately in a classroom.
 - d. Youth Program providers have flexibility in determining appropriate types of academic and occupational education necessary for a WEX. However, prior to initiating the WEX, the Workforce Specialist must document what the academic and educational component is and how it will be provided in the WEX contract.
 - e. Contextual learning does not include attending high school classes or their equivalent that will lead to attainment of a High School Diploma or equivalent.
 - f. Contracts are the mechanism to deliver a WEX to In-School Youth (ISY) and OSY. *When the academic and educational component is not provided directly by the employer, an additional contract with the training providers is required.*
4. ARIZONA@WORK Northeastern Arizona Youth Program providers may provide the following types of WEX:
 - a. Summer employment opportunities and other employment opportunities available throughout the school year.
 - i. Summer employment opportunities must provide direct linkages to academic and occupational learning, including leadership development opportunities, tutoring, occupational skills training, etc., and may provide other elements and strategies as appropriate to serve the needs and goals of the participants.
 - b. Pre-apprenticeship programs

A pre-apprenticeship program is designed to prepare individuals to enter and succeed in an apprenticeship program registered under the National Apprenticeship Act and includes:

 - i. Training and curriculum that aligns with the skill needs of employers in Arizona or region involved;
 - ii. Access to educational and career counseling and other supportive services, directly or indirectly;
 - iii. Hands-on meaningful learning activities that are connected to education and training activities such as exploring career options and understanding how

skills acquired through the coursework can be applied toward a future career;

- iv. Opportunities to attain at least one industry recognized credential; and
- v. A partnership with at least one or more Registered Apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship in a registered apprenticeship program.

Youth Program providers must verify and maintain information on the type of credential offered and the pre-apprenticeship program's documented partnerships with registered apprenticeship programs.

c. Internships and job shadowing

Job shadowing is designed to increase career awareness, help model youth behavior through examples, and reinforce the youth and young adult link between academic learning and occupational work requirements. It includes the youth conducting interviews with people in their prospective professions to learn more about those fields or participating in an expanded informational interview in the work place.

d. On-the-job training (OJT) opportunities

OJT is provided under a contract with an employer who is reimbursed a percentage of the wage rate of the participant being trained while engaged in productive work in a job. For more information on OJT, refer to ARIZONA@WORK Northeastern Arizona Training Services Policy Section 404(A)(ix)(b)(1).

E. Work Experience Expenditure Requirements

The Youth Program provider must spend at least 20 percent of all funds allocated to the Youth Program on paid and unpaid WEX.

1. Allowable WEX expenditures include the following:

- a. Wages/ stipends paid for participation in a WEX;
- b. Staff time working to identify and develop a work experience opportunity, including staff time spent working with employers to identify and develop the WEX;
- c. Staff time working with employers to ensure a successful WEX, including staff time managing the WEX;
- d. Staff time spent evaluating the WEX;
- e. Participant WEX orientation sessions;
- f. Classroom training or the required academic educational component directly related to the WEX;
- g. Incentive payments directly tied to the completion of the WEX (see Section 509); and

- h. Employability skills/ job readiness training to prepare the youth for the WEX.
 - 2. The provider must track the program funds spent on paid and unpaid WEX, including wages and staff costs for the development and management of work experiences, and report such expenditures to the ARIZONA@WORK Northeastern Arizona Board Staff in monthly finance reports.
 - 3. Providers must track the percentage of funds spent on WEX by calculating the total local area youth funds expended on WEX rather than by calculating the funds expended separately for ISY and OSY Youth.
 - 4. Administrative costs are not subject to the 20 percent minimum WEX requirement.
 - 5. Leveraged resources must not be used to fulfil any part of the 20 percent minimum.
- F. Youth Program providers must ensure there is a written Work Experience Agreement or contract between each employer offering the WEX to ensure compliance with WIOA and applicable regulations. *The agreement must be maintained in the participant's file and include at a minimum:*
- 1. The duration of the WEX;
 - 2. Remuneration;
 - 3. Specific tasks and duties;
 - 4. Specific skills to be attained and how attainment will be measured, including targeted timeframes;
 - 5. Identification of the academic and educational component, including how it will be provided;
 - 6. Supervision;
 - 7. Health and safety standards;
 - 8. Other conditions of the WEX, such as consequences of not adhering to the agreement; and
 - 9. A termination clause.

204.4 PROGRAM ELEMENT 4: OCCUPATIONAL SKILLS TRAINING

Occupational skills training is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by a certain occupational field at entry, intermediate or advanced levels.

- G. ARIZONA@WORK Northeastern Arizona Youth Program providers must offer priority consideration to training programs that offer postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area. Such training must:
- 1. Be outcome oriented and focused on an occupational goal specified in the ISS;
 - 2. Be of sufficient duration to impact the skills needed to meet the occupational goal; and
 - 3. Result in the attainment of a recognized postsecondary credential.

- H. The training program must meet requirements listed in ARIZONA@WORK Northeastern Arizona Training Services Policy (Chapter 400).
- I. Occupational skills training must be competitively procured by contract or grant. *However, OSY ages 16-24 may be issued an Individual Training Account (ITA) with a specified dollar amount to provide training using WIOA Title IB Youth Program funds based on the needs identified in the ISS.* ITAs allow participants the opportunity to choose the training provider that best meets their needs.
 - 1. If an ITA is used to pay for the training, the training program must be listed as an approved program on the Eligible Training Provider List (ETPL). ***For more information on ITA requirements, see Training Services Chapter 400, Section 410.***
 - 2. ISY must not use youth-funded ITAs. However, ISY between the ages of 18 and 21 may co-enroll in the WIOA Title IB Adult Program if the youth's needs, knowledge, skills and interests align with the WIOA Title IB Adult Program and may receive training services through an ITA funded by the Adult Program.

204.5 PROGRAM ELEMENT 5: EDUCATION OFFERED CONCURRENTLY WITH WORKFORCE PREPARATION AND TRAINING FOR A SPECIFIC OCCUPATION

Education offered concurrently with workforce preparation and training for a specific occupation is reflective as an integrated training model. Program providers must ensure the service is only added to the Service and Training Plan in Arizona Job Connection when the following services are provided at the same time:

- A. Workforce participation activities;
- B. Basic academic skills; and
- C. Hands-on occupational skills training connected to a specific occupational cluster, or career pathway.

204.6 PROGRAM ELEMENT 6: LEADERSHIP DEVELOPMENT OPPORTUNITIES

Leadership development encourages responsibility, confidence, employability, self-determination, and other positive social behaviors such as:

- A. Exposure to postsecondary educational possibilities;
- B. Community and service learning projects;
- C. Peer-centered activities, including peer mentoring and tutoring;
- D. Organizational and team work training, including team leadership training;
- E. Training in decision-making, including determining priorities and problem solving;

- F. Citizenship training, including life skills training such as parenting skills and work- behavior training;
- G. Civic engagement activities, which promote the quality of life in a community; and
- H. Other leadership activities that place the youth in a leadership position such as serving on the standing youth committee.

NOTE: *Calling a youth to advise the youth to come into the ARIZONA@WORK Northeastern Arizona job center or affiliate site **does not meet** the definition of leadership development.*

204.7 PROGRAM ELEMENT 7: SUPPORTIVE SERVICES

Supportive services for youth are services that enable an individual to participate in WIOA activities. For additional information, refer to ARIZONA@WORK Northeastern Arizona Supportive Services Policy Chapter 300.

204.8 PROGRAM ELEMENT 8: ADULT MENTORING

Program providers must make adult mentoring available, which may include a youth being matched with an adult mentor, an employer, or an employee of an employer.

- A. Program providers must ensure that adult mentoring for youth:
 - 1. Is a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the participant;
 - 2. Lasts at least 12 months and may occur during the program year and following exit from the program; and
 - 3. Matches the youth with an individual mentor with whom the youth interacts on a face-to-face basis. In addition to the face-to-face interaction, group mentoring activities and mentoring through electronic means are allowable as part of mentoring activities.
- B. Providers must ensure appropriate procedures are in place to adequately screen and select mentors.
- C. Attempts to find a suitable mentor in the community who is not a Workforce Specialist must be documented in the participant's case notes. In the event that a suitable community based mentor cannot found, Workforce Specialists may serve as mentors when adult mentors in the community are not available.

204.9 PROGRAM ELEMENT 9: FOLLOW-UP SERVICES

The purpose of follow-up services is to ensure the youth is successful in employment and/ or postsecondary education and training after exiting from the program. *Follow-up services must include more than an attempt to contact the individual or contact made*

only to secure documentation in order to report a performance outcome.

- A. All youth participants must be provided an opportunity to receive follow-up services for a minimum of 12 months after the completion of participation, unless the participant declines to receive follow-up services or the participant cannot be contacted or located. Follow-up services may begin immediately following the last expected date of service in the ARIZONA@WORK Northeastern Arizona Youth Program (and other ARIZONA@WORK Northeastern Arizona partner programs in which the participant is co-enrolled when no futures services are scheduled).
- B. Follow-up services may not be provided beyond 12 months. This does not preclude individuals from accessing ARIZONA@WORK Northeastern Arizona services for which they are determined eligible.
- C. The type and duration of follow-up services must be determined based on the needs of the youth participant and may vary among participants.
- D. Follow-up services for youth may include:
 - 1. Supportive Services, with the exception of needs-related payments;
 - 2. Adult Mentoring;
 - 3. Financial literacy education;
 - 4. Services that provide labor market information and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling and career exploration services;
 - 5. Services necessary to ensure success of the youth employment and/ or postsecondary education.
- E. Follow-up services must be accurately recorded in case notes in the Arizona Job Connection (AJC) at the time they are provided to ensure expediency of services. Case notes in AJC must contain documentation substantiating follow-up contact with the youth, including follow-up attempts. This may include, but is not limited to:
 - 1. A letter;
 - 2. An e-mail or text message or
 - 3. Case notes based on an actual conversation, either in person or by telephone.

Follow-up attempts with the participant must be made and documented in AJC on a monthly basis during the 12-month period.
- F. If it becomes necessary during the follow-up period to utilize WIOA services beyond those available through the follow-up component, *re-enrollment into WIOA is required*. A waiting period for re-enrollment shall not be imposed on a participant.

204.10 PROGRAM ELEMENT 10: COMPREHENSIVE GUIDANCE AND COUNSELING

Comprehensive guidance and counseling provides individualized counseling to participants.

- A. Comprehensive guidance and counseling includes:
 - 1. Drug and alcohol abuse counseling;
 - 2. Mental health counseling; and
 - 3. Referrals to partner programs, as appropriate.
- B. When referring participants to necessary counseling that cannot be provided by the ARIZONA@WORK Northeastern Arizona Youth Program provider, the program provider must coordinate with the organization it refers to in order to ensure continuity of service.
- C. When funds exist with the ARIZONA@WORK Northeastern Arizona Youth Program provider, it is allowable to provide counseling services directly to participants rather than refer the youth to partner programs.

204.11 PROGRAM ELEMENT 11: FINANCIAL LITERACY ACTIVITIES

Financial literacy education may include the following activities:

- A. Support the ability of participants to create budgets, initial checking and saving accounts at banks, and make informed financial decisions;
- B. Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards.
- C. Teach participants about the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine accuracy of a credit report and how to correct inaccuracies and how to improve or maintain good credit;
- D. Support the participant's ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;
- E. Educate participants about identity theft, ways to protect themselves from identity theft; how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity;
- F. Support activities that address the particular financial literacy needs of non-English speakers, including providing support through the development of and distribution of multilingual financial literacy and education materials;
- G. Support activities that address the particular financial needs of youth with disabilities, including connecting them with benefits planning and work incentives counseling;
- H. Provide financial education that is age appropriate, timely and provides an opportunity to

put lessons into practice, such as access to safe and affordable financial products that enable money management and savings; and

- I. Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high-quality age-appropriate, and relevant strategies and channels, including where possible, time and customized information, guidance, tools, and instruction.

204.12 PROGRAM ELEMENT 12: ENTREPRENEURIAL SKILLS TRAINING

Entrepreneurial skills training addresses the basics of starting and operating a small business.

- A. ARIZONA@WORK Northeastern Arizona Youth Program providers must ensure that entrepreneurial skills training develops the skills associated with starting and operating a small business. Such skills may include, but are not limited to, the ability to:
 1. Take initiative;
 2. Creatively seek out and identify business opportunities;
 3. Develop budgets and forecast resource needs;
 4. Understand various options for acquiring capital and tradeoffs associated with each option; and
 5. Communicate effectively and market oneself and one's ideas.
- B. Among the approaches that may be used to teach youth entrepreneurial skills are the following:
 1. Entrepreneurial education programs that provide an introduction to the values and basics of starting and running a business, including guiding youth through the development of a business plan and using simulations of business start-up and operation.
 2. Enterprise development which provides support and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurial education by helping youth access loans or grants that are needed begin business operations and by providing more individualized attention to the development of viable business ideas.
 3. Experiential programs that provide youth with the ability to gain experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business, or they may facilitate placement in apprenticeship or internship positions with adult entrepreneurs in the community.

204.13 PROGRAM ELEMENT 13: SERVICES THAT PROVIDE LABOR MARKET INFORMATION

The ARIZONA@WORK Northeastern Arizona Youth Program provider must provide services that make available labor market and employment information about in-demand industry sectors or occupations in the Northeastern Arizona, such as career awareness, career counseling, and career exploration services.

- A. ARIZONA@WORK Northeastern Arizona Youth Program provider Workforce Specialists must be familiar with state and federal Labor Market Information (LMI) data and LMI tools.
- B. Career awareness begins the process of developing knowledge of a variety of careers and occupations available, their skill requirements, working conditions and training prerequisites; and job opportunities across a wide range of industry sectors. Career pathway models are to be introduced and explored with each participant.
- C. Career exploration is described as the process in which a youth chooses an educational path, training or a job which fits their interests, skills, and abilities.
- D. Career counseling or guidance provides advice and support in making decisions about what career paths to take. Career counseling services may include:
 - 1. Providing information on resume preparation and available workshops;
 - 2. Interviewing skills and available workshops;
 - 3. Potential opportunities for job shadowing; and
 - 4. Long-term benefits of postsecondary education and training (e.g. increased earning power and career mobility).

204.14 PROGRAM ELEMENT 14: POSTSECONDARY PREPARATION AND TRANSITION ACTIVITIES

Postsecondary preparation and transition activities prepare in-school and out-of-school youth for advancement to postsecondary education after attaining a high school diploma or high school- equivalency. The services include exploring postsecondary education options including technical training schools, community colleges, four-year colleges, universities and registered apprenticeships. Additional services include but are not limited to:

- A. Assisting youth to prepare for SAT/ ACT testing;
- B. Assisting with college admission applications;
- C. Searching and applying for scholarships and grants’;
- D. Filling out Financial Aid applications and adhering to changing guidelines; and
- E. Connecting youth to postsecondary education programs.

205 ELIGIBILITY DETERMINATION

At the time of eligibility determination, youth must be an In-School Youth (ISY) or Out-of-School Youth (OSY) to participate in ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program services during any part of the program year.

205.1 OUT-OF-SCHOOL YOUTH

A youth meets the definition of Out-of-School Youth if he or she is:

- A. Not attending school (*see Section 506.4*);
- B. Between 16 and 24 years old at the time of enrollment and one or more of the following:
 - 1. A school dropout;
 - 2. A low income individual with a secondary school diploma or its recognized equivalent and:
 - a. Basic skills deficient; or
 - b. An English language learner;
 - 3. An offender;
 - 4. Homeless, i.e. lacks a fixed, regular and adequate nighttime residence;
 - 5. A runaway;
 - 6. In foster care, has aged out of foster care, or has attained the age of 16 years old and left foster care for kinship, guardianship or adoption;
 - 7. A youth who has been removed from his/her home and is in an out-of-home placement;
 - 8. Pregnant or parenting;
 - 9. An individual with a disability; or
 - 10. A low income individual who requires additional assistance to enter or complete an education program or to secure or hold employment. (*See Exhibit 500A*)
- C. Participants may continue to receive services beyond the age of 24 once they are enrolled in the program.

NOTE: Being a recipient of high school diploma or high school equivalency (HSE) does not cancel the other barriers in the definition of out-of-school youth. A youth between 16-24 years, who is not attending school only need meet one of the barriers above to qualify as an out-of-school youth. For instance, if a youth with a high school diploma or HSE does not meet barrier #2 above, but has an additional barrier on the list, he or she would qualify as out out-of-school youth.

205.2 IN-SCHOOL YOUTH

A youth meets the definition of In-School Youth if he or she is:

- A. Attending secondary school, including secondary and postsecondary school;
- B. Between 14 and 21 years old at the time of enrollment.
- C. The age requirement is extended for youth with disabilities because school districts must provide programs and services to eligible youth with disabilities attending secondary school until they turn 22 years old. Youth with a disability who turn 22 years old during the school year must continue to receive services from the school district until the end of the school year (ARS 15-764);

D. A low income individual **and one of the following:**

1. Basic skills deficient;
2. An English language learner;
3. An offender;
4. Homeless youth, i.e. lacks a fixed, regular and adequate nighttime residence;
5. A runaway;
6. In foster care, has aged out of foster care, or has attained 16 years old and left foster care for kinship guardianship or adoption;
7. A youth who has been removed from his/her home and is in an out-of-home placement;
8. Pregnant or parenting;
9. An individual with a disability; or
10. Requires additional assistance to complete an educational program or to secure and hold employment,.(See Exhibit 500A)

E. If a youth turns 21 years old during participation, he/she may continue to receive services.

NOTE: Individuals who are 22 years and older attending postsecondary education do not meet the age requirement for ISY (14-21 years old) and do not meet the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program eligibility requirements. These individuals may be served by the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Adult Program.

205.3 ELIGIBILITY BARRIER DEFINITIONS

A. A youth is **basic skills deficient** when one of the following definitions applies:

1. The youth performs any of the following at or below an 8.9 grade level:
 - a. Compute or solve math problems;
 - b. Read English;
 - c. Write English; or
 - d. Speak English.
2. The youth is unable to:
 - a. Compute or solve problems,
 - b. Read, write or speak English at a level necessary to function on a job, in the individual's family, or in society, as determined in local policy.
3. Case notes must clearly document the assessment tool used to determine basic skills deficiency. Documented evidence including version of assessment and date completed must be included in the notes.

B. **English Language Learner (ELL)** is defined as an individual who has limited ability in reading, writing, speaking or comprehending the English Language, and whose:

1. Native language is other than English; or
2. Lives in a family or community environment where a language other than English is the dominant language.
3. Case notes must clearly document how ELL status was determined.

- C. **Dropout** is defined as an individual who is no longer attending school and who has not received a secondary diploma or its recognized equivalent. Individuals who have dropped out of postsecondary education are not considered “drop out” for purposes of WIOA Title IB Youth Program eligibility.
- D. **Offender** is defined as an adult or juvenile who:
 - 1. Is or has been subject to any stage of the criminal justice process, and for whom services under this act may be beneficial; or
 - 2. Requires assistance overcoming artificial barriers to employment resulting from a record of arrest or conviction.
- E. **Parenting** includes either a custodial or non-custodial mother or father. When a youth is within the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program age eligibility requirements, the age the youth became a parent does not factor in to the definition of parenting.
- F. A **pregnant individual** only includes the expectant mother.

205.4 SCHOOL STATUS

School status is determined *at the time of enrollment*. The enrollment process may occur over a period of time, as such *Workforce Specialists must determine school status during the time the eligibility determination portion of the program enrollment is made*.

In Arizona, youth must attend school until their 16th birthday. Since the minimum age for out-of- school youth in the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program is 16 years old, and the compulsory age is until the individual turns 16 year old, the requirement of a youth to have not attended school for at least the most recent complete school calendar quarter or calendar quarter to be enrolled in the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program does not apply.

Once the school status of the youth is determined, that school status remains the same throughout the youth’s participation.

- A. Youth who are temporarily not attending school because the school is on break (Winter, Spring, Fall or Summer Break) but are enrolled to continue school after the school break are considered to be attending school and may only be enrolled as ISY. The same applies if the youth is planning to attend a different school after the break.
- B. When a youth is in the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program between high school graduation and postsecondary education, the youth is considered *in-school if they have registered for classes*, even if the youth has not yet begun postsecondary classes at the time of the Youth Program enrollment.

However, if the youth graduates high school and registers for postsecondary education, but does not ultimately follow through with attending postsecondary education, then such a youth would be considered an OSY.

- C. For purposes of ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program the following are not considered schools for purposes of determining school status:
1. Providers of adult education under WIOA Title II;
 2. YouthBuild programs;
 3. Job Corp program;
 4. Dropout re-engagement program; and
 5. HSE programs.

NOTE: An exception exists for HSE programs, including dropout re-engagement funded by the public K-12 school system that are classified by the school system as still enrolled in school are considered ISY.

- D. Youth who are participating in online secondary and postsecondary school are considered to be attending school. Likewise, youth who are homeschooled, or attending public, private or chartered secondary/ postsecondary schools are considered to be attending school.
- E. When a youth is enrolled in any credit-bearing postsecondary education classes including credit-bearing community college classes and credit-bearing continuing education classes, then they are considered attending postsecondary education and therefore, an ISY. If the youth is only enrolled in non-credit bearing postsecondary classes, he or she would not be considered to be attending postsecondary school, and therefore is an OSY

205.5 NEEDS ADDITIONAL ASSISTANCE CRITERION

The ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program provider must ensure that an ISY enrolled in a program year based solely on eligibility because he or she “requires additional assistance to complete an educational program or to secure and hold employment” criterion is *limited to five percent of ISY*. Providers must track ISY enrolled in the program each year to ensure that no more than five percent are enrolled using this criterion.

See Exhibit 500A for the criterion to be used to determine whether an applicant meets the definition of “*requires additional assistance to complete an educational program or to secure and hold employment*” for both ISY and OSY.

205.6 LOW-INCOME REQUIREMENTS

- A. All In-School Youth must be low-income unless included in the five percent low-income exception.
- B. Low-income eligibility requirements apply to Out-of-School Youth *only if*:

1. They are recipients of secondary school diplomas or its recognized equivalent
and are at least one of the following:
 - a. Basic skills deficient;
 - b. An English language learner; or
2. In need of additional assistance to enter an educational program or to secure employment. (*See Exhibit 200A*)

205.7 NON-LOW INCOME YOUTH

The ARIZONA@WORK Northeastern Arizona Youth Program provider **must not** serve more than five percent of youth who do not meet low income requirements but who meet all of the other eligibility requirements. The five percent is calculated using the combined total of In-School and Out-of-School youth.

NOTE: The percentage of non-low income youth will be calculated based on the percent of newly enrolled youth in the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program in a given program year who would ordinarily be required to meet the low- income criteria.

206 DOCUMENTATION FOR ELIGIBILITY

- A. The ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program must ensure timely documentation is collected in regards to eligibility determination. Attempts to secure documentation and the outcome must be recorded in the AJC case notes promptly and accurately.
- B. Uploading documents to AJC in lieu of retaining hard copies in a participant's file is acceptable (see Section 507.1(A))

206.1 GENERAL REQUIREMENTS

- A. ARIZONA@WORK Northeastern Arizona Youth Program providers must use the "WIOA Eligibility and Verification Checklist" (*See Exhibit 200B*) for program eligibility determinations and data validation.

The checklist identifies source documents, which are documents used to verify eligibility requirements. *All eligibility documents may be uploaded into AJC.* If documents are not uploaded into AJC, the program provider must retain original documentation in the participant's program file.

- B. The program provider must ensure that reasonable attempts have been made to secure source documentation as identified in the checklist.
- C. The "WIOA Applicant Statement" (*See Exhibit 200C*) may be used as permitted on the "WIOA Eligibility and Verification Checklist" when the information is unverifiable or it is unreasonably difficult for the applicant to obtain
 1. For high-risk Out-of-School youth, the "WIOA Applicant Statement" is

- acceptable to allow upfront enrollment of the youth.
2. High risk Out-of-School youth means not having a high school diploma or HSE, and meeting the eligibility criteria as listed Section 506.1.

NOTE: An exception includes out-of-school school youth who meet the “*Requires additional assistance to enter or complete an education program or to secure or hold employment*” eligibility criteria (*see Exhibit 200A*), as they are **not considered high risk**. As such, the WIOA Applicant statement may not be used for upfront enrollment for youth that meet this eligibility criteria.

3. If additional documentation is required on the “WIOA Eligibility and Verification Checklist” (*See Exhibit 500B*) for data validation purposes, the Workforce Specialist may request the documentation from the youth after the youth has begun to receive Youth services.

D. ARIZONA@WORK Northeastern Arizona Youth Program providers **must ensure all youth who are less than 18 years old have a “WIOA Applicant Statement” (See Exhibit 200C) signed by the youth’s parent, guardian, or a responsible adult/ collaborating witness.** By signing the form, the youth’s parent, guardian, or a responsible adult/ collaborating witness gives permission for the youth to participate in the program and verifies the information on the form is accurate.

206.2 DETERMINING LOW-INCOME STATUS

A. A low-income youth is an individual who:

1. Receives, is a member of a family that receives, or has received in the past six months, cash payments under a federal, state, or local income-based public assistance program (e.g. Temporary Assistance to Needy Families (TANF));
2. Receives annual income in relation to family size that does not exceed the higher of the federal poverty guidelines or 70 percent of the United States Department of Labor (USDOL) Lower Living Standard Income Level (LLSIL) for each program year (*see Exhibit 500D*);
3. Receives, is a member of a family that receives, or has received in the past six months, assistance through the Supplemental Nutrition Assistance Program (SNAP);
4. Qualifies as a homeless individual who lacks a fixed, regular and adequate nighttime residence;
5. Is a foster child for whom state or local government payments are made;
6. Is a member of a family whose income does not meet low-income requirements, but is an individual with a disability, and therefore can be counted as a family of one so that individual income meets the low-income requirement;
7. Receives Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI);
8. Receives, is a member of a family that receives, or has received within the past six months, assistance through the Refugee Cash Assistance

(RCA), a federally- funded need-based cash benefit for refugees and other eligible beneficiaries, who are not eligible for other cash assistance programs, such as TANF.

- B. Receives, or is eligible to receive, a free or reduced price lunch under the Richard Russell National School Lunch Act (NSLA); or
10. Is a youth who lives in a high poverty area, as determined by the American Community Survey

- B. Family is defined as two or more related by blood, marriage, or decree of court, who are living in a single residence, and are included in one or more of the following categories:

1. A married couple and dependent children;
2. A parent or guardian and dependent children; or
3. A married couple (20 CFR 675.300).

NOTE: When an individual is not living in a single residence with other family members the individual is not considered a member of the family for the purpose of WIOA Title IB income calculation.

- C. For the definition of family-

1. Dependent is defined as a child who is:
 - a. Age 18 and under at the end of the previous calendar year; or
 - b. Age 18 and under at the end of the previous calendar year and was a student.
2. Regardless, of residence and/or citizenship, anyone claimed as a dependent on another person's Federal income tax return for the previous year must be presumed part of the person's family for the current year. To negate, this assumption the person who was claimed as the dependent for income tax purposes is required to provide information that demonstrates the person is no longer financially dependent.
3. Runaway youth, emancipated youth and court adjudicated youth separated from family through an involuntary temporary residence elsewhere (e.g. institutionalized, incarcerated, placed as result of court order) must not be classified as a dependent.

NOTE: The individual was a student if he or she was enrolled as a full-time student during any of the 5 months of the previous calendar year. The course must have been provided by a school, state, county or local government. *A school includes technical and mechanical schools, but does not include OJT.*

- D. Unemployment Insurance compensation and child support are **not excluded** from income calculations in determining low-income status. They are to be included in the calculation as income.

206.3 HIGH POVERTY AREAS

Youth living in high poverty areas are automatically considered low income individuals.

C. WIOA defines a high poverty area as:

1. A census tract;
2. Set of continuous census tracts;
3. An American Indian reservation;
4. Oklahoma Tribal Statistical area (as defined by U.S. Census Bureau);
5. Alaska Native Village, or Alaska Native Regional Corporation Area;
6. Native Hawaiian Village Homeland Area; or
7. Other tribal land as defined by the USDOL Secretary in guidance or county with a poverty rate of at least 25 percent, as set every five years using the American Community Survey five-year data.

D. ARIZONA@WORK Northeastern Arizona Youth Program providers must use *Determining High Poverty Census Tracts in Arizona (See Exhibit 200E)* and the *High Poverty Census Tracts Spreadsheet (See Exhibit 200F)* to determine if a youth residing in Gila County lives in a high poverty area by census tract. Youth residing in Navajo and Apache Counties are automatically considered low income individuals as these two counties have been identified as low income counties per section 507.3.A definition 7.

206.4 INCOME VERIFICATION

ARIZONA@WORK Northeastern Arizona Youth Program staff must attempt to gather information such as other public assistance the individual may receive, (e.g., TANF and SNAP), and verify if the individual receives monetary support. Attempts include calls to the participant, letters, e-mail messages, etc. **Low-income verification attempts must be documented in case notes in AJC.**

- E. Documentation related to income verification as outlined on the *WIOA Eligibility and Verification Checklist (Exhibit 200B)* may be collected and uploaded into AJC. If the documentation is not uploaded to AJC, the documentation must be retained in the participant's program file.
- F. Income that is being used to determine income eligibility should be identified using the *WIOA Eligibility and Verification Checklist (Exhibit 200B)*.
- G. When a verification document cannot be obtained, the *WIOA Applicant Statement (Exhibit 200B)* with signatures by the individual and a witness who has knowledge of the information provided may be accepted as a last resort as permitted by the *WIOA Eligibility and Verification Checklist*.

NOTE: The Workforce Specialist or other ARIZONA@WORK Northeastern Arizona program/partner staff do not qualify as witnesses and must not sign as the witness.

- H. When a participant is receiving child support, the witness is the parent providing the child support or an individual that has knowledge of the applicant receiving child support. The attempts used to gather information needed for verification must be documented in AJC case notes.
- I. Individuals who are recipients of TANF, SNAP, or SSI *may* automatically be income eligible and require no further income verification *if* the individual has provided acceptable documentation utilizing the *WIOA Eligibility and Verification Checklist (See Exhibit 200B)*.
- J. TANF documentation must be current and indicate that the individual is receiving, or is a member of a family that is receiving, or has received in the past six months, TANF assistance at the time of application to the WIOA Title IB Youth Program.
- K. SNAP documentation must be current and indicate that the individual is receiving, or is a member of a family that is receiving, or has received in the past six months, SNAP assistance at the time of application to the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program.
- L. SSI/SSDI documentation must be current and indicate that payments were made to a single recipient. The individual applying to the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program must be the recipient at the time of application to a in order to be considered as a family of one.
- M. Refugee Cash Assistance documentation must be current and indicate that payments were made to a single recipient. The individual applying to the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program must be the recipient at the time of application in order to be considered as receiving public assistance.
- N. Individuals who receive, or are eligible to receive free or reduced lunch through the Richard B. Russell National School Lunch Program must provide:
 - 1. School documentation of a free or reduced lunch;
 - 2. A letter from TANF documenting approval; or
 - 3. A letter from SNAP that documents approval.

NOTE: Individuals who receive free lunch through the Summer Food Service Program (SFSP) and students that attend schools that are eligible for the Community Eligibility Provision (CEP) of the Healthy, Hunger Free Kids Act of 2012 *schools are not automatically considered low income.*

- O. High poverty area verification must include case notes in AJC that indicate the name of the high poverty areas (county) or census track number that was used on making the determination that youth lives in a high poverty area. The poverty

rate for a high poverty area must also be included in AJC case notes.

206.5 SELECTIVE SERVICE REQUIREMENTS

Determination of the Selective Service status of male youth must be conducted prior to program enrollment.

- A. Every male citizen, or any male residing in the United States, born on or after January 1, 1960, unless exempt, is required to register with the Selective Service System (SSS) between their 18th and 26th birthdays. Registration with SSS can occur within 30 days of a male's 18th birthday and prior to attaining his 26th birthday.
- B. Male youth participants who turn 18 years old while enrolled in the program must complete a Selective Service Registration within 30 days of their 18th birthday. If a participant does not register for Selective Services within 30 days of his 18th birthday, he
is no longer eligible to receive WIOA services. Youth denied services must be advised of available WIOA grievance procedures.
- C. A detailed list of Selective Service registration requirements may be found online at <https://www.sss.gov/Registration-Info/WhoRegistration>.
- D. Selective Service registration can be verified online at <https://www.sss.gov/Home/Verification>. The applicant's name, date of birth, and social security number is needed to verify registration.

206.6 BASIC SKILL ASSESSMENT FOR OBJECTIVE ASSESSMENT

It is not required to use tests approved by the National Reporting System (NRS), nor are they required to determine the youth's grade level or Educational Functioning Level (EFL) when determining basic skills for the objective assessment. The ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program is not prohibited from using these tools.

Information in this section does not apply to the determining educational functioning level for the measureable skill gain performance accountability measure.

Program staff may use the following methods to measure basic skill for the objective assessment:

- A. Other formalized testing instruments designed to measure skill-related gains. The formal testing must be:
 - 1. Valid and reliable;
 - 2. Appropriate for the target audience;
 - 3. Fair;
 - 4. Cost effective;

5. Well-matched to test administrator's qualification's; and
 6. Easy to administer.
- B. Less formal alternative assessment techniques such as observation, folder reviews or interviews may be used for individual with disabilities, as described in TEGL 21-16.
- C. Use of previous basic skill assessment result if such previous assessments have conducted in the past 6 months is allowable.

207 REGISTRATION, ENROLLMENT AND DATA ENTRY

WIOA addresses an important distinction between registration in AJC and enrollment into the WIOA Title IB Youth Program, which includes the circumstances when a youth must be registered in AJC and when youth must be enrolled in the WIOA Title IB Youth Program.

207.1 REGISTRATION, ENROLLMENT AND DATA ENTRY REQUIREMENTS

- A. Registration in AJC occurs when a youth creates an account that includes a complete data demographics and work history. However, documentation or verification of income is not required.
- B. Registration in AJC must occur when a youth has taken action that demonstrates an intent to use program services and who meets specific reporting criteria for the program including youth who:
1. Provide identifying information;
 2. Use the self-service system;
 - a. Self-service system includes the youth independently accessing any workforce development system program's information either in a physical location, such as a One-stop resource room or partner agency or remotely via use of electronic technologies.
 - b. Virtual services that provide a level of service beyond independent job search or information seeking on the part of a youth would qualify as not self- service.
 3. Receive informational-only services or activities;

Informational-only services are activities or services that are readily available information that does not require assessment by a staff member of the individual's skills, education, and career objective. Examples of informational services include providing:

- a. Labor market information;
- b. The unemployment rate;
- c. Information on businesses that are hiring or reducing their workforce;
- d. Information on high growth industries; and
- e. Referrals other than referrals to employment.

- C. Enrollment must occur when a youth requires services beyond self-service, or informational- only services and activities. The program enrollment will depend on the participant's eligibility (*See Section 506*). Examples of services that require significant staff involvement include the staff member's assessment of the youth's skills, education, or career objectives in order to achieve any of following;
 - 1. Assisting the youth in deciding appropriate next steps in the search for employment, training, and related services, including job referral;
 - 2. Assisting the youth in assessing barriers to employment; or
 - 3. Assisting the youth in accessing other related services necessary to enhance their employability and individual employment needs.
- D. Enrollment into the Youth Program includes:
 - 1. The collection of documentation to support eligibility determination;
 - 2. The provision of an objective assessment;
 - 3. Development of an individual service strategy; and
 - 4. Participation in any of the 14 program elements (*See Section 205*).
- E. Enrollments are pending in AJC until they are approved by designated staff. Pending enrollments **must be approved within 30 days** to ensure expediency of services.

All pending enrollments must be resolved no later than 15 days from initial eligibility determination. The Youth Program provider must run the WIOA No Participation report in AJC to monitor the timeliness of the pending client record. Extenuating circumstances must be noted in case notes to extend the enrollment beyond the 15 days. No extension is to be made beyond 30 days from date of initial eligibility determination.

NOTE: When pending enrollments are not approved within 30 calendar days, the AJC system requires that the youth's eligibility be re-determined. This includes collecting new/updated verification documentation for eligibility determination
- F. Transactions relating to program-provided activities and services must be entered or updated in AJC promptly and accurately to ensure expediency of services.
- G. Youth Program providers must run the AJC "Report 8" on a monthly basis to ensure timely follow-ups and accurate data recording.

207.2 CO-ENROLLMENT

Co-enrollment means enrollment in more than one program at a time. Co-enrollment allows for the leveraging of additional resources for training and financial support, enhanced service delivery and increased customer support which results in greater participant outcomes.

- A. Youth age 18 and older may be co-enrolled in the ARIZONA@WORK Northeastern Arizona Adult or Dislocated Worker Programs. Program providers must:
 - 1. Ensure the youth meets eligibility criteria for both the Youth and Adult

Program or the Youth and Dislocated Worker Program to co-enroll participants;

2. Determine the appropriate level of service and combination of program services that will be provided to youth age 18-24 based on the service needs of the participant and if the participant is career-ready based on the objective assessment of the occupational skills, prior work experience, employability and participant's needs;
3. Identify and track the funding streams for youth who are enrolled concurrently in the ARIZONA@WORK Northeastern Arizona Youth/Adult Program or the Youth/ Dislocated Worker Program;
4. Ensure services are not duplicated; and
5. Ensure previous foster care youth who have been co-enrolled in WIOA Title IB Youth Program and Adult/Dislocated Worker Program and are now adults continue to remain eligible for both the Youth Program and Adult Program services and do not require re-determination of eligibility.

B. ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program participants may also have be co-enrolled with the following partner programs:

1. Employment Service (Wagner-Peyser)
2. Vocational Rehabilitation
3. Adult Education and Literacy Programs;
4. Migrant Seasonal Farm Workers Program (MFSWs) at the point of entry to the One-Stop system to assure equity of services is provided;
5. Jobs Program (TANF Work Program);
6. Youth Build;
7. Job Corps;
8. Supplemental Nutrition Assistant Employment and Training (SNA E&T); or
9. Other required ARIZONA@WORK Northeastern Arizona partner programs.

C. When youth are co-enrolled, services provided by partner programs must be added to the Service and Training plan in AJC under partner provided services. When a service is provided by a partner that uses the AJC system (such as Employment Service or TAA) the services do not need to be added to Partner-Provided services on the Service and Training plan because the AJC system automatically considers the individual co-enrolled when he/she is receiving services from more than one program that uses AJC.

208 INCENTIVE PAYMENTS

Youth Program providers may use incentive payments for recognition and achievements *directly related to training activities and work experiences*. Specific program goals, outlined in the ISS, including the amount of the incentive must be entered into the participant's file case notes. All incentives are based on the availability of funding.

A. Providers must ensure incentive payments are tied to the goals of a specific

program and are outlined in writing before the commencement of the program that may provide incentive payments. **See Exhibit 200G** for a list of qualifying incentives.

- B. Awarding of incentive payment must align with the local program's organization policies, as well as Code of Federal Regulations Part 200 and 2900- Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR parts 200), and WIOA Fiscal Policies (Chapter 3, Section 100).

209 PROGRAM EXITS

Youth who have not received a service funded by the ARIZONA@WORK Northeastern Arizona (WIOA Title IB) Youth Program or funded by a partner program for 90 consecutive calendar days, from the date of last service and is not scheduled for future services is considered to have exited the program. The provider may re-enroll participants at any time if they remain eligible. There shall be no waiting period prior to re-enrollment.

A. Exits Excluded from Participation

The date of exit is the last date a service was provided to a participant. Case notes in AJC must include the reason for exit and documentation may be uploaded into AJC. When documentation is not uploaded into AJC, the documentation must be retained in the participant's program file.

1. The participant will not be counted in performance if they exit the program for any of the following reasons:
 - a. *Deceased*: participant died during participation in the program;
 - b. *Institutionalized*: participant is residing in a correctional institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain institutionalized for at least 90 calendar days;
 - c. *Health/Medical*: participant is receiving medical treatment that precludes entry into unsubsidized employment or continued participation in a WIOA program. This does not include temporary conditions expected to last for less than 90 calendar days;
 - d. *Entered into Active Military Duty*: participant who is a reservist and has been called to active duty or participant enlists and reports for active duty which prevents participation in the program; and
 - e. *Foster Care*: participant is in the foster care system as defined in 45 CFR 1355.20(a), and exits the program because the participant has moved from Northeastern Arizona as part of such a program or system.
2. When a participant receives services from multiple programs, the most recent service end date is the date of exit.

3. Follow-up services provided to youth do not extend the exit date.

B. Gaps in Service

A youth participant may be placed in a “Gap in Service” when a situation arises that will temporarily prevent program participation for greater than 90 consecutive calendar days. Gaps in Service are limited to a total of 180 consecutive days. The gap in service will provide time for youth to address barriers to continued participation without exiting the program. *Eligibility does not need to be re-determined at the end of the gap in service.*

1. A gap in service extends a participant’s exit date for 90 calendar days from the time he or she is placed into the gap. *The gap in service must be related to:*
 - a. A delay before the beginning of training;
 - b. A health/medical condition, or providing care for a family member with a health/medical condition; or
 - c. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.
2. A gap in service may be extended for an additional 90 consecutive calendar days (for a total of 180 consecutive calendar days) to resolve the issue that is preventing a participant from completing program services. The extended gap in service must be related to:
 - a. A health/medical condition, or providing care for a family member with a health/medical condition; or
 - b. A temporary move from the area that prevents the individual from participation in services, including National Guard or other related military service.
3. All gaps in service must be referenced in case notes detailing the reason for the gap in service.
4. Workforce Specialists must ensure that timely documentation resulting from communication with the participant results in accurately recording the gap in service and does not exceed the agreed upon time frame of the gap.

**Northeastern Arizona Local
Workforce Development
Board (Approval Authority)**

301 BACKGROUND

Supportive services, such as transportation, child care, dependent care, housing, and needs-related payments are necessary to enable an individual to participate in Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker Program authorized career or training services. The WIOA Title I-B Youth Program also includes supportive services as one of the 14 program elements.

Supportive services for participants of the Adult, Dislocated Worker, and Youth programs may be provided by contracted service providers when it has been documented that such services are necessary to enable an individual, who cannot afford to pay for such services, to participate in WIOA Title I-B-career or training services *that are not available from other sources*. The Northeastern Arizona Local Workforce Development Board may establish funding caps for support services.

All supportive services are based on the availability of funds.

302 AUTHORITY

- A. Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L. 113-128);
- B. 20 CFR 680.900, 680.940, 680.950;
- C. 2 CFR Part 215 and 220
- D. Office of Management and Budget 20 CFR 200.470
- E. Training and Employment Guidance Letters (TEGLs) 19-16 and 21-16
- F. Arizona Revised Statutes 41-1967

303 SUPPORTIVE SERVICE REQUIREMENTS

- A. Supportive services must be made available for participants who may need additional assistance, as determined through comprehensive assessments. These assessments, and all supportive services provided, must be documented in the participant's Individual Employment Plan (IEP), Individual Service Strategy (ISS), as well as appropriately recorded and documented in Arizona Job Connection (AJC).
- B. Supportive services must only be provided through the Adult, Dislocated Worker and Youth Programs *when the individual is unable to obtain supportive services through other programs that provide such services and who are participating in training or career services*.

- C. Supportive services may only be provided to:
 - 1. Adults and dislocated workers *who are participating in career or training services and are determined to be in need*; and
 - 2. Youth who have been determined in need of such services.
- D. The provision of supportive services must be necessary and reasonable, both in cost and in the item being purchased, per 2 CFR Part 215 and 220.
- E. Payments for supportive services must be made directly to the vendor.
Documentation that supports the payment of these services, such as receipts, invoices, and billing statements must be kept in the participant's program file, or uploaded to the participant's file in AJC.

304 TYPES OF SUPPORTIVE SERVICES

Supportive services, as described in 20 CFR 680.900, for adults and dislocated workers, and 20 CFR 681.570 for youth, include, but are not limited to:

- A. Linkages to community services;
- B. Transportation assistance;
- C. Child care and dependent care assistance;
- D. Housing and utility bills assistance;
- E. Educational testing assistance;
- F. Reasonable accommodations for individuals with disabilities;
- G. Legal Aide services;
- H. Referrals to healthcare such as drug and mental health services;
- I. Work-related expenses including uniforms, appropriate work attire, and work-related tools, including eyeglasses and protective eye gear;
- J. Training-related assistance with school supplies, and other necessary items for students enrolled in postsecondary education classes expenses not covered in the ITA or any other training contract; and
- K. Payments and fees for employment and training-related applications, tests, and certifications.

305 TRAINING-RELATED EXPENSES

The dollar limits for supportive services may change due to funding availability. Participants are eligible for financial supportive services as outlined below.

ARIZONA@WORK Northeastern Arizona reserves the right to limit the amount of supportive services funding that may be provided to a participant within a Program Year. Most in need and other factors may be taken into consideration at the discretion of the Workforce Specialist and/or Program Supervisor.

All participants must remain in good standing based the agreed programmatic

employment plan (e.g., IEP or ISS) while enrolled in career service or training activity.

Support Service	Limits Per Program Year	
	Adult/Dislocated Worker	Youth
Child Care (if not eligible for or to supplement DES or other subsidized child care) ¹ **	Up to \$1,000	Up to \$2,000
Certification/licensing/testing ²	Based upon need – not to exceed \$600.00	Based upon need – not to exceed \$1000
Tools	\$600.00 maximum	\$600.00 maximum
Uniforms	\$300.00 maximum	\$300.00 maximum
Shoes – Safety and others required for work	\$150.00 maximum	\$150.00 maximum
Work / Interview Clothing ³	\$500.00 maximum	\$500.00 maximum
Eye Care (eye exam & glasses)	\$300.00 maximum	\$300.00 maximum
Utilities/Rent (one-time assistance if not available through other sources)	\$500.00 maximum	\$1500 maximum
Relocation Assistance (to include housing deposit/utilities)**	\$1,000.00 maximum	\$1,000.00 maximum
Auto Repair **	\$1,000.00 maximum	\$2000.00 maximum
Transportation – Bus passes	\$400.00 maximum	\$500.00 maximum
Gas Cards	\$500.00 maximum	\$25 per week Except anything over 50 miles, \$35
Medical Care – i.e. TB testing, immunizations (for employment purposes)	\$300.00 maximum	\$300.00 maximum
Dental Assistance (One-time only for employment purposes)**	\$1,000.00 maximum	\$1,000.00 maximum
Reasonable Accommodation for Individuals with Disabilities**	Based on need – not to exceed \$1,000.00	Based on need – not to exceed \$2,000.00
Other (explanation needed) i.e., Hygiene, haircuts, Legal Aid	Based upon need and funding availability	Based upon need and funding availability

These are guidelines and are subject to exceptions based on need and must be approved by the Supervisor.

¹ Child care provider must be an approved Arizona Department of Economic Security Contractor.

² Certification/licensing/testing must be completed within 3 months of approval.

** A minimum of three (3) quotes are required for these services.

- A. Licenses, certifications, and testing fees may be paid when the license, certification, or the successful completion of the test meets one or all of the following criteria:
 - 1. Is required to legally work in the occupation,
 - 2. Is required by a specific employer for the individual to obtain employment, or
 - 3. Will result in a recognized credential.

306 NEEDS-RELATED PAYMENTS

ARIZONA@WORK Northeastern Arizona does not offer Needs Related Payments.

307 SUPPORTIVE SERVICE PROHIBITIONS

Unallowable costs that do not meet the conditions of supportive services include, but are not limited to:

- A. Payment toward goods or services incurred or received prior to the participant's enrollment in a WIOA Title I-B program;
- B. Fines and penalties, such as for parking tickets, moving violations and fines for late utility payments;
- C. Taxes, except for sales taxes and gasoline taxes, such as income taxes, and business/ payroll taxes (for employers).
- D. Child support;
- E. Legal fees, except for legal aid, such as bail and restitution;
- F. Debts that have been turned over to a collection agency;
- G. The purchase of goods or services that are illegal under any federal, state, local, or municipal law or statute;
- H. The purchase of cigarettes, alcoholic beverages or firearms; and
- I. Union dues.

308 CHILD CARE

Child care payments using WIOA Adult, Dislocated Worker or Youth Program funds must be aligned with current State Childcare Allowances.

- A. Payment and eligibility for Child Care services will follow the guidelines set forth by the Department of Economic Security (DES) Child Care Services program. Income eligibility and maximum reimbursement rates can be found in the Document Center at <https://des.az.gov/documents-center>.

- B. The childcare provider must be an approved DES contractor. A list of child care providers that contract with DES is available from the [Child Care Resources and Referral Service](#).
- Participant having three (3) unexcused absences will have childcare discontinued.

309 FOLLOW-UP SERVICES

- A. **Youth Program** allows the provision of supportive services as a follow-up service to ensure the youth is successful in employment and/ or post-secondary and training.
1. Follow-up services for youth may include supportive services, with the exception of needs-related payments;
- B. **Adult and Dislocated Worker Programs** do not allow the provision of supportive services after the completion of participation as supportive services are provided to enable adults and dislocated workers to participate in career and training services.
- C. If an individual in follow-up services is determined to be need of support services the individual must be re-enrolled into the program based on eligibility.

**Northeastern Arizona Local
Workforce Development
Board (Approval Authority)**

501 BACKGROUND

This section provides policy for Training Services that are available to unemployed or underemployed Adults, Dislocated Worker and Youth Program participants.

Training prepares individuals with the in-demand skills that meet employers' needs based on labor market information, sector strategies, career pathways, and business outreach. Through job driven training, individuals acquire the skills needed to obtain and/or retain employment and increase earnings which lead to self-sufficiency.

502 AUTHORITY

- Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L. 113-128)
- Code of Federal Register 20 Part 680 and 681
- Training and Employment Guidance Letter (TEGL) 17-05
- Training and Employment Guidance Letter (TEGL) 15-10
- Training and Employment Guidance Letter (TEGL) 19-16
- Training and Employment Guidance Letter (TEGL) 21-16

503 PROGRAM PARTICIPANT ELIGIBILITY FOR TRAINING SERVICES

A. Adult and Dislocated Worker Program Participants

Training services, based on availability of funding, may be made available to employed and unemployed individuals enrolled in the Adult or Dislocated Worker Programs who:

- a. A Workforce specialist determines, after an interview, evaluation, or objective assessment, and career planning, are:
 1. Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services;
 2. In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
 3. Have the skills and qualifications to participate successfully in training services.
- b. Select a program of training services that is directly linked to the employment opportunities in the local area or in another area to which the individuals are willing to commute or relocate;
- c. Are unable to obtain grant assistance from other sources to pay the costs of such training,

including such sources as State-funded training funds, Trade Adjustment Assistance (TAA), and Federal Pell Grants established under title IV

of the Higher Education Act of 1965, or require WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants); and

- d. If training services are provided through the adult funding stream, are determined eligible in accordance with the State and ARIZONA@WORK Northeastern Arizona priority of service.
 1. There is no required minimum time period for participation in career services before receiving training services.
 2. Workforce specialists must provide a justification for training via detailed documentation in case notes and in each participant's Individual Employment Plan. At a minimum, the documentation must contain the following program elements:
 - a. Summation of the interview identified in Section 403(A)(i)(a);
 - b. Assessment results identifying skill gaps;
 - c. Labor market information supporting the decision to pursue training; and
 - d. The program of study including:
 1. Start date of training; and
 2. Anticipated end date of training
 3. Documentation should clearly indicate- the targeted outcomes of the training. It should provide an unquestionable understanding between the Workforce specialist and the program participant of each step in program participation.
 4. Case notes and the IEP must clearly indicate how the training will be applied to job search and when job search is anticipated to start and program participation is expected to end (Program exit date).

B. Youth Participants

1. The Youth Program must make each of the 14 program elements available to eligible youth program participants. Of the 14 elements, Occupational Skills Training qualifies as training for youth participants.

504 TYPES OF TRAINING SERVICES

- A. Training services for eligible participants must be directly linked to the employment opportunities in either Northeastern Arizona or in another area where the participant is willing to relocate. Training services may include:

- i. **Occupational Skills Training** that is designed to meet the technical needs of the workplace and provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by specific occupational fields. Occupational skills training includes training in non-traditional employment. The selected training must meet the following criteria:
 - a. Providers of occupational skills training must be listed on the Eligible Training Provider List (ETPL) and the specific training program must be listed as WIOA approved.

- b. Outcome-oriented and focused on the occupational goal specified in the IEP;
 - c. Result in the attainment of a post-secondary credential; and
 - d. Provide a reasonable expectation that the WIOA participant will gain self-sufficient employment upon completion of training.
 - e. Priority consideration must be given for training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in Northeastern Arizona.
- ii. **Occupational skills training (YOUTH PROGRAM)** is an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by a certain occupational field at entry, intermediate or advanced levels.
- a. Occupational skill training, which includes priority consideration for training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in Northeastern Arizona.
 - b. Such occupational skills training must:
 - 1. Be outcome oriented and focused on an occupational goal specified in the ISS;
 - 2. Be of sufficient duration to impact the skills needed to meet the occupational goal; and
 - 3. Result in the attainment of a recognized postsecondary credential.
 - c. The occupational skills training must meet the following criteria used to identify youth training providers in the local plan to include determining whether:
 - 1. Training is related to in-demand occupations or career pathways identified in the state and local plans; and
 - 2. A recognized credential is awarded upon the successful completion of a training program.
 - d. Occupational skills training must be competitively procured by contract or grant. Out-of-School Youth ages 16-24 may be issued an Individual Training Account (ITA) with a specified dollar amount to provide training using WIOA youth funds based on the needs identified in the ISS.
 - e. If an Individual Training Account (ITA) is used to pay for the training, the training program must be listed as an approved program on the Eligible Training Provider List.
- iii. **Programs that combine workplace training with related instruction**, which may include cooperative education programs.
- iv. **Skill upgrading and retraining** is short-term or part-time training designed to upgrade skills in the workplace and provide retraining to enhance current skills.

NOTE: Skill upgrading and training programs must be listed on the ETPL.

- v. **Entrepreneurial training** on the responsibilities of organizing, managing, and operating a business or enterprise.

- vi. **Transitional Jobs** provide a time-limited work experience that is wage-paid and subsidized, and is in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history.
 - a. Transitional jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment.
 - b. The Northeastern Arizona Local Workforce Development Board may approve the use of not more than 10 percent of the combined total of adult and dislocated worker allocations for transitional jobs.
 - c. Transitional jobs must be combined with comprehensive career services and supportive services.

- vii. **Adult Education and Literacy** activities include English Language Acquisition and integrated education training programs, *provided concurrently or in combination with:*
 - a. Occupational skills training;
 - b. On-the-job training;
 - c. Incumbent worker training;
 - d. Programs that combine workplace training with related instruction;
 - e. Training programs offered by the private sector;
 - f. Skill upgrading and retraining;
 - g. Entrepreneurial training

NOTE: *Programs that combine Adult and Literacy activities with Occupational Skills training and skill upgrading must be listed on the Eligible Training Provider List (ETPL). Only the Occupational Skills Training or Skill Upgrading and Retraining component of the training must meet ETPL performance criteria.*

- viii. **Job readiness training** if offered in combination with:
 - a. Occupation skills training;
 - b. On-the-job training;
 - c. Incumbent worker training;
 - d. Programs that combine workplace training with related instruction;
 - e. Training programs operated by the private sector;
 - f. Skill upgrading and retraining;
 - g. Transitional jobs; or
 - h. Entrepreneurial Training.

- ix. **Registered Apprenticeship** based on an approved set of National Guidelines for

Apprenticeship Standards developed by a national committee or organization which includes on-the-job training and related technical instruction in a classroom instruction setting.

- a. On-the-job training may be provided to eligible individuals as part of the registered apprenticeship program participation for qualified participants. See Section 404 (ix)(b)(1)(e).
- x. **Work-Based Training** that results in transferable skills within the industry in which the worker is currently employed and/or other growing industries within the Northeastern Arizona and in an occupation with a high potential for sustained demand or growth as determined by the Northeastern Arizona Local Workforce Development Board.
 - a. Work-based training must not:
 1. Displace any currently employed workers (including a partial displacement such as a reduction in non-overtime work, wage, or employment benefits);
 2. Impair an existing contract for services or a collective bargaining agreement;
 3. Procure, contract for, or incur costs to be paid from WIOA Title IB program funds prior to the start date, as determined by the date when all parties sign the contract;
 4. Be provided to any company that has relocated within the previous 120 days of its application if the relocation has resulted in any employee losing his or her job at the original location;
 5. Include proprietary training specific to a company, unless skills are determined to be transferable to other businesses or industries; and
 6. Be used to directly or indirectly assist, promote, or deter union organizing.
 - b. Work-Based Training includes the following types of training. The trainings are not subject to the ETPL except for Registered Apprenticeship Programs:
 1. **On-the-Job Training (OJT)** provided under a contract with an employer or registered apprentice program sponsor in the public, private non-profit or private sector. The employer is reimbursed a percentage of the wage rate of the participant being trained while engage.
 - a) **Employer reimbursement** payments are deemed payments for taking on extraordinary costs associated with training of participants and the potentially lower productivity of the participants while in OJT. Employers are not required to document the extraordinary costs
 - b) Employers may be reimbursed up to 50 percent of the wage rate of OJT.
 - c) **Time limits** on OJTs must be based on the following criteria, but *not to exceed three months in duration*:
 - 1) Skill requirement of the occupation;
 - 2) Academic and skill level of the participant;
 - 3) Prior work experience; and

- 4) The goals outlined on the participant's IEP.

OJTs may be extended to not longer than six months in total duration with supervisor approval.

- d) **On-the-Job Training for Eligible Existing Workers:** contracts may be written for eligible existing workers under the following conditions:
 - 1) The employee is not earning a self-sufficient wage as determined by ARIZONA@WORK Northeastern Arizona policy; and
 - 2) The training relates to:
 - Introduction of new technologies;
 - Introduction to new production or service procedures;
 - Upgrading to new jobs that require additional skills
- e) **On-the-Job Training and Registered Apprenticeship Programs** OJT contracts may be written with Registered Apprenticeship programs or participating employers in the Registered Apprenticeship program to cover the on-the-job training portion.
 - 1) ITAs can be combined with on-the-job contracts when placing participants into Registered Apprenticeship programs.
 - 2) OJT contracts with Registered Apprenticeship programs must be consistent with other OJT requirements in this policy including those for existing workers in section 404(ix)(b)(1)(d)

2. **Incumbent Worker Training** designed to help the ARIZONA@WORK Northeastern Arizona's workforce obtain the skills necessary to retain employment and prevent job loss. Training activities are carried out by the local workforce development board in conjunction with employers or a group of employers (which may include employers in partnership with other entities for delivering such training) for the purpose of assisting such workers in obtaining the skills necessary to retain employment or avert layoffs. An incumbent worker does not have to meet the eligibility requirements for career and training services for adults and dislocated workers under WIOA, unless they also are enrolled as a participant in the WIOA Adult or Dislocated Worker program.

- a) **Incumbent Worker Eligibility Requirements**

To qualify as an incumbent worker, the individual must:

- 1) Be employed;
- 2) Meet the Fair Labor Standards Act for an employer-employee relationship; and
- 3) Have an established work history for at least six months with the employer.

NOTE: *In the event that the incumbent worker training is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six (6) months or more as long as a majority of those employees being trained do meet the employment history requirement*

- b) **Funding Incumbent Worker Training**
- 1) Up to 20 percent of the combined total of the Adult and Dislocated Worker allocation may be reserved for incumbent worker training.
 - 2) The amount reserved for incumbent worker training must be approved by the Northeastern Arizona Local Workforce Development Board.
 - 3) *Employers participating in incumbent worker training must pay the non-federal share of the cost of providing the training to their incumbent workers.* The non-federal share of such cost must be determined by taking into consideration factors such as:
 - The number of employees participating in the training;
 - The wage and benefit levels of the employee (at the beginning and anticipated upon completion of the training);
 - The relationship to the competitiveness of the employer and the employees; and
 - The availability of other employer-provided training and advancement opportunities.
 - 4) The non-federal share must not be less than:
 - 10 percent of the cost for employers with not more than 50 employees;
 - 25 percent of the cost for employers with more than 50 employees but not more than 100 employees.
 - 50 percent of the cost for employers with more than 100 employees.
 - 5) The non-federal share provided by an employer may include the amount of the wages paid by the employer to a worker while the worker is attending the training program. The employer may provide the share in cash or in-kind.

3. Customized Training designed for the specific requirements of an employer or group of employers, which is related to new production or service procedures, upgrading to new jobs that require new skills, workplace literacy or other appropriate purposes as identified by the Northeastern Arizona Local Workforce Development Board. *Upon completion of the training the employer must commit to employ or continue to employ the individual(s) who participated in the training.*

- a) Eligibility for Employed Individual Customized training of an eligible employed individual may be provided for an employer or a group of employers when:
- 1) The employee is not earning a self-sufficient wage or wages comparable to or higher than wages from previous employment, as

determined by Local WDB policy;

2) The customized training relates to introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the Northeastern Arizona Local Workforce Development Board.

505 EMPLOYER ELIGIBILITY FOR WORK-BASED TRAINING

All businesses must be located and conducting business within the state of Arizona. Each business agrees to:

- A. Complete an application and enter into a contract with the ARIZONA@WORK Northeastern Arizona service provider funding the training program;
- B. Adhere to applicable WIOA administrative requirements as well as the non-discrimination and equal opportunity provisions of the laws;
- C. Provide a Training Development Plan that identifies the training clearly identifying the need and competencies that will be achieved for each individual selected to receive the training;
- D. Provide copies of a “Certificate of Completion” to the Northeastern Arizona Local Workforce Development Board for each individual who successfully completes the prescribed training program. Such certificates must contain the individual’s name and the class or course completed through training;
- E. Employ, or in the case of incumbent workers continue to employ, an individual upon successful completion of training;
- F. Be available for ARIZONA@WORK Northeastern Arizona program monitoring on a scheduled basis;
- G. Provide quarterly post-training reports, including information on the retention and/or promotions of trainees and the impact training made on the business, for one year after the completion of the training.

506 ADMINISTRATIVE REQUIREMENTS FOR WORK-BASED TRAINING

A. Performance Requirements

Adult, Dislocated Worker and Youth service providers must collect performance data to ensure employers who are participating in work-based training are fulfilling

their commitment to hire training participants after they complete the training programs.

- i. Adult, Dislocated Worker and Youth service providers must not contract with an employer who previously received payments under WIA or WIOA if the employer has exhibited a pattern of failure to provide training participants with continued long-term employment that includes wages, benefits (as well as health benefits) and working conditions that are equal to regular employees who worked the similar length of time and are doing the same type of work.

507 ADULT, DISLOCATED WORKER AND YOUTH SERVICE PROVIDER RESPONSIBILITIES

- A. The Adult, Dislocated Worker and Youth service provider responsibilities for work-based training consist of:
 - i. Identifying a point of contact in the LWDA who will assist the business customer with questions and concerns, and provide overall support for the contract;
 - ii. Incorporating the employer's Training Development Plan into the IEP and identifying any other barriers or services needed;
 - iii. Monitoring during the training period and upon completion of the training contract;
 - iv. Recommend funding limitations to the Northeastern Arizona Local Workforce Development Board ;
 - v. Developing policies and procedures for in-kind contributions (e.g. costs of training space or facilities at an employer's place of business used during training);
 - vi. Identifying during the application process how the training program will benefit individual workers participating in training (i.e., promotion, increased wage, career ladder, attainment of self-sufficiency, layoff aversion);
 - vii. Reviewing WIOA participant progress in the work-based training(s) and determining if supportive services are needed;
 - viii. Monitoring the work site upon placement of the WIOA participant after completion of training to document whether the WIOA participant is working in the agreed upon position, at the agreed upon salary, and utilizing the skills obtained through the customized training;
 - ix. Including a provision in the contract with the employer for contract termination due to lack of funds or lack of WIOA participant attendance in the training;
 - x. Including a provision in the contract with the employer permitting LWDA, state, and federal staff to review the training records; and
 - xi. Creating a list of eligible providers of work-based training opportunities.

- xii. Monitor each onsite contract for the purposes of determining that providers are in compliance with the contract, including:
 - a. Payroll, time, and attendance records substantiate the
 - b. amounts claimed for reimbursement; and
 - c. Training, wages, hours, benefits, and working conditions are
 - d. provided in accordance with the contract.
- xiii. Monitor the performance and progress of the LWDA participant on a regular basis to determine if:
 - a. Continued participation is required;
 - b. Transfer to another activity is appropriate;
 - c. Placement in unsubsidized employment has occurred; and
 - d. Other services would be more appropriate.
- xiv. Visit program participants and their supervisors at the worksites to:
 - a. Assist in job-related or personal counseling; and
 - b. Provide job coaching.

508 CREDENTIALS

- A. Training programs approved by Workforce specialists for qualified Adult and Dislocated Worker program participants must result in either a federally-recognized credential to be approved for the Eligible Training Provider List (ETPL) or a locally-recognized training as defined in the AJC Service Code Dictionary. The ETPL consists of programs approved for use by Workforce Investment and Opportunity Act Title I-B.
- B. Workforce specialists are encouraged to approve programs of training for qualified program participants that result in the attainment of federally-recognized credentials that have four attributes that add value to a credential include:
 - a. *Industry-Recognized*: An industry-recognized credential is one that either is developed and offered by, or endorsed by, a nationally recognized industry association representing a sizeable portion of the industry sector; or a credential that is sought and accepted by companies within an industry sector for the purposes of hiring or recruitments which may include credentials from vendors of certain products.
 - b. *Stackable*: A credential is considered stackable when it is part of a sequence of credentials that can be accumulated over time to build up an individual's qualifications and help them to move along a career pathway or up a career ladder to different and potentially high paying jobs.
 - c. *Portable*: A credential is considered portable when it is recognized and accepted as verification of the qualifications of an individual in other settings; either in other

geographic areas, at other Department of Economic Security Chapter 2 – Section 500 WIOA Policy Manual Training Section 29 Issue date: December 29, 2015 Revision date: August 22, 2016 educational institutions, or by other industries or employing companies.

- d. *Accredited*: Accreditation helps to ensure that an educational program that is provided by an institution of higher education meets acceptable levels of quality.
- C. **Federally-Recognized Credentials** are awarded in recognition of individual attainment of measurable technical or occupational skills necessary to obtain employment or advance in an occupation. They are an attestation of qualification or competence issued to an individual by a third party (such as an educational institution or an industry or occupational certifying organization) with the relevant authority or assumed competence to issue such a credential.

Types of Federally-Recognized Credentials

Federally-recognized credentials include the following:

- 1. **Educational credentials** include diplomas, degrees, and certificates. Credit hours are the building blocks for education credentials.

Types of educational credentials include the following:

- 1. High school diploma;
- 2. GED or High School Equivalency (HSE);
- 3. Educational certificates;
 - a) Certificates must be based on credit hours.
 - b) Educational certificates are awarded after completion of an organized program of study at the postsecondary level, not a single course.

NOTE: *Educational certificates must be recorded in AJC as Other Recognized Diploma, Degree or Certificate.*

- c) Certificates of completion may be educational certificates **if they are based on credit hours and awarded for the completion of an organized program of study, not a single course. Certificates of completion that do not meet this definition must not be considered a federally-recognized credential.**

Certificates of completion that are awarded after successful completion of a training programs that prepares students to take Occupational License and Personnel Certification examinations must also **not** be considered federally-recognized credentials.

- 4. Associate's diploma/degree;
 - 5. Bachelor's diploma/degree; and
 - 6. Postgraduate degree, such as Master and Doctoral degrees.
- High School Diploma, GED and High School Equivalency (HSE) are only counted as federally-recognized credentials for WIOA Adult, Dislocated Worker and Youth credential rate performance measures, if the participant has retained or

obtained employment or is in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.

2. Industry Recognized Credentials

1. **Registered Apprenticeship Certificates** issued by a Registration Agency, either the State's Apprenticeship Office or the U.S. Department of Labor. For more information on Arizona's Apprenticeship Office, see <https://www.azdes.gov/apprenticeship/>

- a. Interim credentials may be developed from an approved set of apprenticeship standards for the occupation. They are portable recognition of an apprentice's accomplishments and are issued based on recognized components of an apprenticeable occupation.
- b. Registered Apprenticeship Certificates must be recorded under the Other Recognized Diploma, Degree and Certificate category on the Outcome page in AJC.

2. Occupational Licenses are granted by state and federal agencies or regulatory bodies and are required for an individual to work in the occupation. Examples of Occupational Licenses include, but are limited to: cosmetology licenses, massage therapy licenses, commercial driver's licenses, or nursing licenses (see <http://www.careeronestop.org/toolkit/training/findlicenses.aspx>).

Characteristics include:

- c. They are defined by laws and regulations and are intended to set professional standards and ensure safety and quality;
- d. Time-limited occupational licenses must be renewed based on meeting ongoing requirements;
- e. Violations of the terms of the license may result in legal action;
- f. Completion of a program of study that prepares an individual for an occupational license is not a credential;
- g. Occupational Licenses may be required in addition to other credentials. The credential for completing the educational program must only be recorded in AJC if the participant successfully received an Occupational License as the license is required to work in the occupation.

3. **Occupational Certifications** attest that the individual has attained the necessary knowledge and skill to perform a specific occupation or skill.

Characteristics include:

- h. It must be industry-recognized or result in a professional association certification;
- i. It is granted by third party non-governmental agencies, usually associations or businesses;
- j. It is intended to set professional standards for qualifications, such as a certification for a crane operator or a Novell Network Certified Engineer;

- k. It usually requires successful completion of an examination or assessment of the individual's knowledge and skills through an examination or assessment provided by a certifying body.
- l. It usually requires a set amount of work experience or professional/technical experience;
- m. It must usually be renewed after a certain time period; and
- n. Violation of standards or requirements may result in suspension or revocation of the certification.

For a list of Occupational Certifications and certifying agencies, see <http://www.careeronestop.org/EducationTraining/Find/certificationfinder.aspx>

NOTE: *Completion of a training program that prepares a participant for an assessment or test that results in an Occupational License or a Personnel Certification is not a federally- recognized credential. The credential must only be recorded under the Outcomes screens in AJC after the participant successfully completes the test and receives his/her certificate or license.*

C. Locally-Recognized Credentials: Locally-recognized credentials are obtained after completing a training that has been determined by the Northeastern Arizona Local Workforce Development Board to not result in a federally-recognized credential, but which is determined of value due to its being required by local employers and to result in employment. Locally-recognized credentials include the following:

- 1. A certificate of completion received upon the successful completion of a program based on competencies and curriculum that are developed in partnership with employers within the LWDA. Training programs that result in this type of locally- recognized credential may be approved to be listed on the ETPL. This certificate of completion must be:
 - a. Obtained from the results of a valid, objective assessment;
 - b. Based on significant vocational content;
 - c. Portable from one employer or region in the state to another; and
 - d. Meaningful to employers.

Locally-recognized credentials are excluded in the performance reporting of the credential attainment rate indicator, as they are not federally-recognized.

However, employment in the 2nd and 4th quarter after exit and median earnings in the 2nd quarter after exit will count towards performance, as appropriate.

509 FUNDING TRAINING SERVICES

Funding for training is based on the availability of program funds and is limited to program eligible participants who are unable to obtain other grant assistance to pay for the cost of training or who require assistance beyond that available from other sources to pay for such training.

Workforce specialists must coordinate funding arrangements and co-enrollments with One-Stop partners and other entities.

- A. Workforce specialists must ensure that WIOA training funds are awarded only when no other sources of funding are available or the amount available is insufficient in covering the participant's training costs. Alternative sources of funding that may be available include, but are not limited to:
 - i. State-funded training funds;
 - ii. Trade Adjustment Assistance (TAA);
 - iii. Rehabilitation Act funds;
 - iv. Temporary Assistance for Needy Families;
 - v. Federal Pell Grant funds; or
 - vi. Other federal grant funds.
- B. In making the determination that WIOA funds are required, Workforce specialists must take into account the full cost of training, *including the cost of supportive services and other appropriate costs, to ensure the training is completed successfully.*
- C. This provision does *not* apply to the GI Bill or other forms of Veterans Administration (VA) education or training benefits. *Veterans and spouses are not required to coordinate their entitlement to VA training benefits with WIOA training funds.*
- F. Student loans are excluded when determining the individual's overall need for WIOA funds for educational costs.
- G. Individuals may be attending school when they become a WIOA participant; reimbursement of training costs is not allowed for payments made prior to WIOA program participation.

510 PELL GRANTS

- A. Federal Pell Grants are awarded to cover tuition costs and education-related expenses, but only the amount of the grant that applies to the participant's tuition will be used to reimburse the expended WIOA funds.
- B. Pell Grant eligibility is established by completing the Free Application for Federal Student Aid (FAFSA - www.fafsa.ed.gov). Workforce specialists must maintain documentation in the participant's file to support the eligibility determination and award of the Pell Grant.
- C. All eligible program participants pursuing training at a Pell Grant eligible institution must apply for a Federal Pell Grant. A participant may enroll in WIOA-funded training while his/her application for a Federal Pell Grant is pending. *Following the award of the Pell Grant, the training provider must reimburse the respective program the amount that the Pell Grant covers from the WIOA funds used to*

underwrite the training.

- D. A completed agreement between the respective program and the educational institution must be on file as well as with the WIOA participant before any funds are paid to the training provider. This agreement must detail:
 - i. The amount to be initially paid by the program; and
 - ii. Between the training provider and the participant to reimburse the program through the Federal Pell Grant, if applicable.

511 INDIVIDUAL TRAINING ACCOUNT (ITA)

ITAs are established and used to provide training services to eligible WIOA Adult or Dislocated Worker participants based on the training needs identified in the participant's IEP. ITAs are used for all training options that require use of the ETPL. Each training program requires a separate ITA.

Approval of all ITAs issued for training must be documented in the participant's case file, providing evidence based on real-time labor market information for identifying in-demand occupations.


A. ITA Payments

- i. Payments from an ITA may be made in a variety of ways including the electronic transfer of funds through financial institutions, vouchers, or other appropriate methods.
- ii. Payments may also be made incrementally through payment of a portion of the costs at different points in the training course.
- iii. All ITAs are subject to approval by Program Management.

B. ITA Limitations

- i. The amount and duration of each participant's ITA must be justified based on the participant's needs as identified in the IEP and maintained in the participant's case file such as the occupational choice or goal and level of training needed to succeed in that goal.
- ii. Eligible participants may select any approved training program from the ETPL, but the ITA may not exceed 24 months in total.
- iii. The IEP and associated case notes must clearly identify the start and targeted end date of the ITA and program of study.
- iv. The Northeastern Arizona Local Workforce Development Board will establish a dollar amount limit of \$6,000 per participant for ITAs. Funding ceilings may be adjusted with approval of the Northeastern Arizona Local Workforce Development Board.
 - a. On a limited case-by-case basis, Workforce specialists may request

- approval above the established limit in 410(B)(iii). Approvals must be justified in writing and based on such factors as alignment with in-demand occupations available in the service delivery area. All requests for this exception must be approved by the Program Manager.
- b. An individual may select a training program that costs more than the maximum amount available for ITAs when other sources of funds are available to supplement the ITA (e.g. Pell Grants, scholarships, etc.)
 - v. The ITA amount cannot exceed the total cost that is listed on the ETPL.
 - vi. Participant must carry a minimum of 6 credits per semester. All classes must be required for the training program.

 <small>NORTHEASTERN ARIZONA</small> <small>A proud partner of the americanjobcenter network</small>	Effective Date:	SECTION 600 MONITORING POLICY (PROGRAM ONLY)
	Revision Date:	
Northeastern Arizona Local Workforce Development Board (Approval Authority)	Approval Date:	

600 BACKGROUND

This section establishes Northeastern Arizona Local Workforce Development Board (NEAZ LWDB) policy regarding the oversight responsibilities as outlined in the following:

- Section 183 of the Workforce Innovation and Opportunity Act (WIOA);
- Code of Federal Regulations (20 CFR 683.410);
- Workforce Arizona Council Policy #07 ARIZONA@WORK WIOA Statewide Monitoring Policy;
- Terms and conditions in any Intergovernmental Agreement or contract entered into on behalf of the Local Workforce Development Area (LWDA) for ARIZONA@WORK Northeastern Arizona Adult, Dislocated Worker, Youth Program activities as well as the One -Stop Operator.

This policy will ensure that:

- Adult, Dislocated Worker and Youth Programs and services are operated in compliance with WIOA and applicable Federal, State rules and regulations and ARIZONA@WORK Northeastern Arizona Policies and Procedures;
- Services and training are being provided to participants as described in the agreement document
- The appropriate verification of eligibility or enrollment of participants is on file.
- Effective equal employment opportunity guidelines are used in program design and operation;
- Tangible outcomes are accomplished at costs which are in line with original proposed costs;
- Fiscal integrity is insured and auditable records are maintained;
- Eligible training providers conform to federal, state and local policies; and
- The One-Stop Operator is fulfilling its contractual obligations.

601 AUTHORITY

- Workforce Innovation and Opportunity Act (WIOA) of 2014 (P.L. 113-128)

- Code of Federal Register 20 Part 683.410
- Code of Federal Register (Uniform Guidance) 2 Part 200
- Training and Employment Guidance Letter No. 19-16
- Training and Employment Guidance Letter No. 21-16
- Training and Employment Guidance Letter No. 10-16
- Workforce Arizona Council Policy #07 ARIZONA@WORK WIOA Statewide Monitoring Policy

602 SUBRECIPIENT DETERMINATION

Per Uniform Guidance, 200.330 “subrecipient” means a non-Federal entity that receives a sub- award from a pass-through entity to carry out part of a Federal program. Characteristics which support the classification of an entity as a subrecipient include when the entity:

- A. Determines who is eligible to receive what Federal assistance;
- B. Has its performance measured in relation to whether objectives of a Federal program were met;
- C. Has responsibility for programmatic decision making;
- D. Has responsibility for adherence to applicable Federal program requirements specified in the award; and
- E. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute.

603 SCHEDULING OF ANNUAL MONITORING REVIEW

Monitoring will be conducted by NEAZ LWDB staff and/or third-party contractors, under the guidance of the NEAZ LWDB.

- A. No sooner than 30 days prior to an onsite monitoring review, the NEAZ LWDB will send in writing, notification to the subrecipient notifying them of the annual monitoring. The notification will include the following information:
 1. Purpose of the monitoring
 2. Timeframe of the selected information to be monitored
 3. Information to be monitored
 4. Location of the monitoring
 5. Proposed dates of the monitoring review
 6. Request to confirm proposed dates of the monitoring review.
- B. No sooner than three (3) working days prior to the commencement of the

agreed upon on site monitoring review, the NEAZ LWDB will notify the subrecipient of the program participant files selected for review.

604 MONITORING FREQUENCY

The following shall be monitored on site at least once each program year:

- A. Adult Program
- B. Dislocated Worker Program
- C. Youth Program
- D. One-Stop Operator

605 CONDUCTING MONITORING REVIEWS

A. Adult, Dislocated Worker, Youth Programs

For monitoring of client files the sample size will be a minimum of 10 percent of clients served during the most recently completed program year. If a subrecipient's administrative office/fiscal department is separately located at an inaccessible site or not within a reasonable commute of the NEAZ LWDB's central office, as defined by a 50 mile, one-way drive or greater, NEAZ LWDB staff will require that copies of all requested records, files or other documents of a sufficient nature and sample size be delivered to a location identified by NEAZ LWDB staff for review.

This does not preclude a site visit to a subrecipient's administrative offices, if warranted.

Monitoring reviews may be a combination of the following:

1. Desk reviews utilizing access to participant and operational records as recorded in the state case management and reporting system;
2. On-site case file reviews
3. Participant and staff interviews

a. Desk Reviews

Through a given program year, NEAZ LWDB staff may randomly choose participant records stored in the State case management and reporting system for review. Such reviews will consist of assessing the following:

- i. Thoroughness of information entered into the system;
- ii. Detailed case notes;
- iii. Documents uploaded into the system;
- iv. Data reports pertaining to program activity; and
- v. Performance of program outcomes.

b. On-site Review

On-site reviews will utilize standard monitoring instruments developed by the Arizona Department of Economic Security (DES) or NEAZ LWDB based upon requirements in the agreement(s)

covering the following areas, as applicable:

- i. Agency administration;
 - ii. Program performance;
 - iii. MIS documents;
 - iv. Participant files;
 - v. Training services;
 - vi. Equal Employment and Nondiscrimination; and
 - vii. Worksite/internship/externship monitoring.
- c. Participant and staff interviews
- During the scheduled on-site review, the NEAZ LWDB may request the scheduling of interviews with selected program participants. These interviews may consist of but not be limited to the following topics:
- i. Professionalism of staff serving the participant;
 - ii. Knowledge of program staff in providing career guidance;
 - iii. Expectations of program versus actual services provided; and
 - iv. Overall satisfaction of program experience.

B. One Stop Operator

- 1. The One-Stop Operator will be subject to an annual review by the NEAZ LWDB utilizing the contracted Statement of Work as the basis for such review.
- 2. The One-Stop Operator will also be held accountable for the performance metrics agreed to by the NEAZ LWDB.
- 3. The NEAZ LWDB will develop monitoring tools to be used for this purpose.

606 MONITORING REPORT

- A. Within 30 days of the initial monitoring completion, the NEAZ LWDB will transmit a draft report of findings, observations and required actions, to the subrecipient or training provider. The report will include the following information:
- 1. Name of subrecipient/training provider;
 - 2. Agreement number(s) or other reference if applicable;
 - 3. Findings, Observations, Recommendations and Required Actions;
 - 4. Time frames for corrective actions; and
 - 5. Due date for response.
- B. A monitoring file will be maintained for each subrecipient/training provider, which will contain monitoring reports and follow-up documents, as well as the worksheets, questionnaires, and other back-up information used in the monitoring. Records will

be retained per the State WIOA Title I-B Record Retention policy.

607 STEPS TO CLOSURE

- A. Subrecipients with open findings identified in the Monitoring Report (see Section 606) will have 30 calendar days after receipt of the report to address the findings in writing and present a corrective plan addressing the required actions outlined in the Monitoring Report utilizing the “[Monitoring Review Corrective Action Plan](#)” form (**Exhibit 600A**).
- B. The subrecipient will submit updated action to the NEAZ LWDB on a monthly basis until all items are completed and accepted by the NEAZ LWDB.
- C. Upon acceptance of the corrective action plan from the subrecipient, the NEAZ LWDB will issue a final close-out report within 30 calendar days.
- D. Failure of the subrecipient to address all outstanding items identified in the [Monitoring Review Corrective Action Plan](#)” within the agreed upon timeframes, could result in further recommended action as determined by the NEAZ LWDB up to and including termination of the subrecipient agreement.

608 TRAINING PROVIDER/CONTRACTOR MONITORING REVIEW

- A. A training contractor as defined in 2 CFR 200.330 is any organization with whom the NEAZ LWDB or subrecipient contracts or partners with to provide specific outlined training, classroom or workplace, including training providers and approved by the NEAZ LWDB Eligible Training Provider List and subrecipient initiated On-the-Job Training Contracts (OJT) and work experience agreements.
A contract is for the purpose of obtaining goods and services for the subrecipient’s use and creates a procurement relationship with the contractor.

Characteristics indicative of such a relationship are when the contractor:

- 1. Provides the goods and services within normal business operations;
- 2. Provides similar goods or services to many different purchasers;
- 3. Normally operates in a competitive environment;
- 4. Provides good or services that are ancillary to the operation of the WIOA Title I-B program; and
- 5. Is not subject to compliance requirements of WIOA as a result of the agreement, though similar requirements may apply for other reasons such as the WIOA monitoring requirement.

609 ELIGIBLE TRAINING PROVIDER MONITORING REVIEWS

- A. The NEAZ LWDB through its designated representative, will conduct monitoring

reviews of the training providers approved on the ARIZONA@WORK Northeastern Arizona Eligible Training Provider List (ETPL - <https://www.azjobconnection.gov/ada/r/training>).

- B. The NEAZ LWDB will conduct eligible training provider monitoring in accordance with State issued policy as posted in the Arizona Department of Economic Security WIOA Policy and Procedure Manual Section 612 “[MONITORING OF TRAINING PROVIDERS](#)”.


610 TRAINING CONTRACTORS

- A. Subrecipients will be held accountable for the contracting and monitoring of such contracts of training contractors as defined in Section 608 of this policy. Monitoring of training contractors may take place in the form of desk reviews and/or on-site reviews.
- B. Subrecipients will ensure that the contractor is in compliance with the terms, conditions, and specifications of their contract. The NEAZ LWDB reserves the right to also perform on-site monitoring when warranted.
 - 1. Desk Review
 - A desk review may include:
 - a. Compliance with the terms, conditions and specifications of the agreement;
 - b. Invoices;
 - c. Client progress reports;
 - d. Participant surveys;
 - e. Certificates;
 - f. Summary of participant performance data; and
 - g. Career Planner feedback.
 - 2. On-site Review
 - On-site reviews may utilize standard monitoring instruments covering the following, as applicable:
 - a. Agency administration;
 - b. Program management;
 - c. Fiscal management;
 - d. Participant files;
 - e. Classroom training;
 - f. Participant interviews;
 - g. Equal Employment and Nondiscrimination; and

h. Worksite/internship/externship monitoring.

611 CONFIDENTIALITY, DATA AND RETENTION

- A. All NEAZ LWDB staff and subrecipient staff participating in monitoring activities will protect the confidentiality of all personally identifiable information (PII) contained in the client files. This includes any third party monitoring such as Single Audits conducted on behalf of the LWDA or subrecipient.
- B. All requisite Data Sharing Agreements must be in place and current at the time of any monitoring review.
- C. All written reports and other documentation pertaining to monitoring and other oversight activities will be made available for review by the NEAZ LWDB, Federal, State and County officials.
- D. Reports and other records of monitoring activities must be retained for three years from the date of submission of the final expenditure reports regarding the funding sources monitored. If any litigation, claim, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion and resolution of all such actions or until the end of the three year period, whichever is later.

 <p>ARIZONA@WORK™ NORTHEASTERN ARIZONA A proud partner of the americanjobcenter network</p>	Effective Date:	SECTION 700 EQUAL OPPORTUNITY POLICY
	Revision Date:	
Northeastern Arizona Local Workforce Development Board (Approval Authority)	Approval Date:	

700 BACKGROUND:

- A. The purpose of this chapter is to ensure ARIZONA@WORK Northeastern Arizona is in compliance with the Americans with Disability Act, Section 504 of the Rehabilitation Act of 1973 (as amended), Section 188 of the Workforce Innovation and Opportunity Act (WIOA) of 2014, and 29 CFR Part 38.
- B. This policy applies to:
 - i. any recipient;
 - ii. programs and activities that are part of the ARIZONA@WORK Northeastern Arizona delivery system and that are operated by ARIZONA@WORK Northeastern Arizona partners, to the extent that the programs and activities are being conducted as part of the ARIZONA@WORK Northeastern Arizona delivery system; and
 - iii. the employment practices of the recipient and/or ARIZONA@WORK Northeastern Arizona partners, as provided in 29 CFR 38.
- C. This policy will be reviewed every two years by the Pinal Workforce Development Board and local EO Officer to ensure the policy is current with the state's Methods of Administration (MOA) and the United States Department of Labor's (DOL) Civil Rights Center (CRC) policies.
- D. Any change in the local area's Equal Opportunity (EO) Officer will be reported to the State WIOA EO Officer to ensure compliance with 29 CFR 38.24 through 38.26.
- E. The local area's WIOA EO Officer will not be in a position that would constitute a conflict of interest.
- F. The local area assures that in equal opportunity matters, the local area's WIOA EO Officer shall report directly to the appropriate local agency official and/or State WIOA EO Officer.

701 AUTHORITY

The policy contained in this manual and chapter is based on the following legal authorities. Links to documents and websites are provided for direct reference.

A. Workforce Innovation and Opportunity Act (Public Law 113-128)

<https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>

B. Federal Regulations:

Note: The federal regulations governing the nondiscriminatory and equal opportunity clauses in the Workforce Innovation and Opportunity Act are still in draft form and provided as notices of Proposed Rulemaking (NPRMs). Policies will be revised as needed when final federal regulations are issued and pending state board approval.

C. U.S. Department of Labor-only NPRMs::

- i. Workforce Innovation and Opportunity Act: Notice of Proposed Rulemaking (Code of Federal Regulation 29 Part 38)

D. The following Acts and Titles as amended:

- ii. The Nondiscrimination and Equal Opportunity provisions of Title I WIOA, Section 188
- iii. Certain civil rights laws including Title VI of the Civil Rights Act of 1964
- iv. Title IX of the Education Amendments of 1972
- v. Age Discrimination Act of 1975
- vi. Section 504 of the Rehabilitation Act of 1973, and
- vii. State of Arizona Method of Administration 2015-2016

E. WIOA is interpreted by the Civil Rights Center (CRC) to be consistent with principles of:

- viii. Title VII of the Civil Rights Act (Title VII), the Americans with Disabilities Act, (ADA) as amended by the Americans with Disabilities Act Amendments Act (ADAAA), and Section 501 of the Rehabilitation Act, as amended; and
- ix. This policy and procedural manual.

702 COMPLIANCE

- A. ARIZONA@WORK Northeastern Arizona must comply with the above laws, rules, regulations, as amended including:

- x. Americans with Disability Act,
- xi. Section 504 of the Rehabilitation Act of 1973 (amended);
- xii. Section 188 of the WIOA of 2014;
- xiii. The Age Discrimination Act of 1975;
- xiv. Title IX of the Education Act of 1972; and
- xv. 29 CFR Part 38.

B. Compliance applies to all recipients, programs or activities that are part of the ARIZONA@WORK Northeastern Arizona delivery system and operated by ARIZONA@WORK Northeastern Arizona partners in either the ARIZONA@WORK Northeastern Arizona comprehensive center or access point locations.

703 NOTICE AND COMMUNICATION

- G. The “Equal Opportunity is the Law” poster will be posted in a conspicuous location in the ARIZONA@WORK Northeastern Arizona service delivery locations.
- H. The Local Equal Opportunity Officer will be designated as required in 29 CFR 38.23 through 38.28.
- I. The Local Equal Opportunity Officer’s name will be posted on the “Equal Opportunity is the Law” posters in the ARIZONA@WORK Northeastern Arizona service delivery locations.
- J. The EO Officer will document each complaint filed on a Discrimination Complaint Log which contains:
 - i. the name and address of the complainant,
 - ii. the basis of the complaint,
 - iii. a description of the complaint,
 - iv. the date the complaint was filed,
 - v. the disposition,
 - vi. the date of the disposition, and
 - vii. any other pertinent information relating to the discrimination complaint.
- K. The EO Officer representing the ARIZONA@WORK Northeastern Arizona partners shall inform the State WIOA EO Officer about complaint investigations and submit the Discrimination Complaint Logs on a quarterly basis.
- L. EEO and Affirmative Action training in the ARIZONA@WORK Northeastern Arizona comprehensive center, affiliate sites and access point locations will be conducted on an annual basis with all WIOA programs.

704 NOTICE TO SPECIAL POPULATIONS

- A. As required in 29 CFR 38.29 through 38.34 ARIZONA@WORK Northeastern Arizona will have a notice and communication system accessible to everyone entering the ARIZONA@WORK Northeastern Arizona. The “Equal Opportunity is the Law” posters in English and Spanish will be posted in the ARIZONA@WORK Northeastern Arizona comprehensive center, affiliate sites and access points, as well.
- B. “Equal Opportunity is the Law” posters must be provided to:
 - i. Registrants, applicants, and eligible applicants/registrants;
 - ii. Participants;
 - iii. Applicants for employment and employees;
 - iv. Unions or professional organizations that hold collective bargaining or professional agreements with the recipient;
 - v. Sub recipients that receive WIOA Title I funds from the recipient; and
 - vi. Members of the public, including those with impaired vision or hearing.
- C. “Equal Opportunity is the Law” forms must be provided to Adult, Dislocated Worker, and Youth-program enrollees, who must acknowledge receipt of the document. The signed forms acknowledging receipt of the document will then be placed in participant files.
- D. Individuals with limited English proficiency will be made aware of their rights utilizing bilingual staff or translation services, and other customers will be made aware of the availability of nondiscrimination policies in service orientation sessions.
- E. ARIZONA@WORK Northeastern Arizona will take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others.

705 RESPONSIBILITY TO PROVIDE SERVICES AND INFORMATION TO INDIVIDUALS WITH DISABILITIES AND/OR IN LANGUAGES OTHER THAN ENGLISH

- A. As required by 29 CFR 38.35 and 38.36 recipients of Federal financial assistance must take appropriate steps to ensure that communications with individuals with disabilities and/or limited English speaking, reading, and writing abilities are as effective as communications with others.
- B. Information and documents will be provided in alternate language and/or interpreters be provided to limited English participants.

706 REVIEW OF ASSURANCES, JOB TRAINING PLANS, CONTRACTS, AND POLICIES AND PROCEDURES.

- A. ARIZONA@WORK Northeastern Arizona ensures Federal EO compliance with programmatic and architectural accessibility (i.e. reasonable accommodations) for individuals with disabilities, and complies with State EO policies.

- B. Whenever possible and with proper notice (generally 48 hours), the ARIZONA@WORK Northeastern Arizona workforce system will fulfill requested accommodations.

707 UNIVERSAL ACCESS.

- A. ARIZONA@WORK Northeastern Arizona will provide universal access to all services offered.
- B. Visual representations of accessibility will be displayed throughout the ARIZONA@WORK Northeastern Arizona location, and

708 COMPLIANCE WITH SECTION 504 AND THE REHABILITATION ACT OF 1973, AS AMENDED AND 29 CFR PART 38.

- A. The Pinal Workforce Development Area has adopted an equal opportunity and non-discrimination policy which is in compliance with State and Federal policy, rules, regulations, and law.
- B. An annual WIOA Equal Opportunity and Non-Discrimination audit will be conducted by the State Equal Opportunity Officer and the local EO Officer to ensure compliance with Equal Opportunity policies.
- C. Northeastern Arizona must be in continuous compliance with these annual audits.

709 DATA AND INFORMATION COLLECTION AND MAINTENANCE

- A. In accordance with 29 CFR 38.37 through 38.41, the ARIZONA@WORK Northeastern Arizona Equal Opportunity Officer, with the assistance from the ARIZONA@WORK Northeastern Arizona partner program staff, will collect and maintain EEO data with regard to system registrants and participants.
- B. The EEO data and information will be maintained in AZJobConnection statewide workforce data collection system.

710 COMPLAINT PROCESSING PROCEDURES

- A. The Northeastern Arizona Local Workforce Development Board has developed and implemented complaint policies and procedures (see Section 800).
- B. Program participants will be provided with information about the ARIZONA@WORK Northeastern Arizona's complaint, grievance, appeals, and EO policies upon enrollment.
- C. Program participants will receive a copy of the complaint, grievance, appeals and EO policies which they must sign, having acknowledged they have read and understand the information. A signed acknowledgement of the complaint, grievance, appeals procedure

and EO policies will be placed in each enrolled participant's file.

711 COMPLIANCE ASSURANCES – CONTRACTORS AND SERVICE PROVIDERS

- A. ARIZONA@WORK Northeastern Arizona is committed to making all services, facilities, and information accessible to individuals without regard to race, color, religion, gender, national origin, age, disability, political affiliation or belief. This applies to all programs and activities, and services provided by or made available to potential employees, volunteers, contractors, service providers, licensees, clients, and potential clients.
- B. All contractors and service providers will be required to provide written assurance in their agreements, grants, and contracts that they will be committed to and will comply with related laws and regulations as mentioned previously in this section.

712 COMMUNICATION SYSTEM

- A. ARIZONA@WORK Northeastern Arizona has established a comprehensive communication system which is based on all partner staff being made aware of the ARIZONA@WORK Northeastern Arizona's obligation to operate its programs and activities in a nondiscriminatory manner, and the extent of the rights of members of these groups to file complaints of discrimination.
- B. Communications are disseminated via written, electronic and in-person formats to all system staff.


713 MONITORING

- A. In accordance with 29 CFR 38.37 through 38.42, Northeastern Arizona sub-recipients for service delivery will be subject to annual monitoring to ensure compliance with all EO requirements and provided staff training accordingly based on the state's current Methods of Administration.

601 EO CONTACTS

See Exhibit 600A for the listing of the following contacts:

- ARIZONA@WORK Northeastern Arizona EO Officer,
- State of Arizona EO Officer
- U.S. Department of Labor/Civil Rights Center EO Director

 <p>ARIZONA@WORK™ NORTHEASTERN ARIZONA A proud partner of the americanjobcenter network</p>	Effective Date:	SECTION 800 COMPLAINTS, GRIEVANCES, AND APPEALS POLICY
	Revision Date:	
Northeastern Arizona Local Workforce Development Board (Approval Authority)	Approval Date:	

800 BACKGROUND – ALLEGED DISCRIMINATION

The nondiscrimination and Equal Opportunity provisions found in Section 188 of the Workforce Innovation and Opportunity Act (WIOA), prohibit discrimination against applicants, beneficiaries and employees on the basis of race, color, national origin, age, disability, sex, religion, and political affiliation or belief, as well as against beneficiaries on the basis of citizenship and participation in WIOA.

In order to ensure that all customers of the ARIZONA@WORK Northeastern Arizona are afforded the right to elevate concerns they have regarding alleged discrimination in the provision of services the following Complaints Policy has been developed.

All other types of complaint resolution policy and procedures can be found in Section 716. The following provision apply to this policy:

- A. Any interested person has a right to file a complaint.
- B. Any complaint relating to a term or condition of employment shall be filed under the employer’s established grievance procedures. All other complaints shall be initiated at the recipient level.
- C. The right to file a complaint or appeal may not be limited or interfered with in any way
- D. Representation of interested parties in connection with complaints or appeals may not be limited or interfered with in any way.
- E. All partner programs will make reasonable efforts to assure that the information will be understood by affected participants and other individuals, including youth and those who are limited-English speaking individuals. Such efforts will comply with the language requirements specified in 29 CFR 38.35 regarding the provision of services and information in languages other than English.

801 AUTHORITY

The policy contained in this manual is based on the following legal authorities. When necessary specific citations of the authorities will be referenced. Links to documents and

websites are provided for direct reference.

- Workforce Innovation and Opportunity Act (Public Law 113-128):
<https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>
- **Federal Regulations:**
Note: The federal regulations governing the nondiscriminatory and equal opportunity clauses in the Workforce Innovation and Opportunity Act are still in draft form and provided as Notices of Proposed Rulemaking (NPRMs). Policies will be revised as needed when final federal regulations are issued and pending state board approval.
- U.S. Department of Labor-only NPRMs:
 - Workforce Innovation and Opportunity Act; Notice of Proposed Rulemaking (Code of Federal Regulation 29 Part 38)
- **State WIOA Policy and Procedure Manual**
<https://des.az.gov/services/employment/workforce-innovation-and-opportunity-act/policy-and-procedure-manual-workforce>
 - Arizona Department of Economic Security Policy No. 1-01-14 and Procedure No. 1-01-14-01
 - Arizona Department of Economic Security Guidance Letter No. 06-06 (issued March 7, 2006)
 - State of Arizona Methods of Administration, 2015-2016, Element Eight “Complaint Processing Procedures”

802 DEFINITIONS

For the purposes of this policy:

- A. **Grievance** shall be a circumstance thought to be unjust and grounds for a complaint. A grievance may be a written or verbal description of an alleged violation of the WIOA, and may be dated and signed by an interested party.
- B. **Complaint** shall mean a formal charge or accusation. A complaint is a written description of an alleged violation of the WIOA, and must be dated and signed by an interested party.
- C. **An appeal** is any written, dated, and signed communication by an interested party expressing their intent to appeal any action or inaction with respect to a grievance or complaint to a higher level. Any action pursuant to the original decision is stayed until a final decision is made by the State.
- D. **Days** is interpreted as calendar days.

803 REASONS FOR FILING A DISCRIMINATION COMPLAINT

- A. Anyone who believes that discriminatory actions have been taken by any of the following may file a complaint:
 - i. Any agency, organization, or business that receives any of the following types of Federal financial assistance. These agencies, organizations, and businesses are known as recipients.
 - a. Financial assistance under Title I of the Workforce Innovation and Opportunity Act (WIOA) Examples include:
 - 1. WIOA programs for adults, youth, and dislocated workers
 - 2. Federal employment and training programs for Native Americans and migrant and seasonal farm workers
 - b. Financial assistance from the U.S. Department of Labor (DOL). These include grantees under grant programs administered by such DOL agencies as:
 - 1. The Veterans' Employment and Training Service (VETS)
 - 2. Any other DOL grant making agencies
 - c. An American Job Center partner listed in WIOA Section 121(b) that offers programs or activities through the American Job Center system receiving financial assistance under Title I of the Workforce Innovation and Opportunity Act (WIOA) or under grant programs administered by DOL. Examples of programs that American Job Center partners must offer through the system include:
 - 1. State employment services programs
 - 2. Unemployment Insurance
 - 3. The Senior Community Service Employment Program (SCSEP) for older workers
 - ii. A State or local government or other public entity (for disability-related matters only)
- B. Consistent with 29 CFR Part 38 § 38.70 any person who believes that either he or she, or any specific class of individuals, has been or is being subjected to discrimination prohibited by WIOA, may file a written complaint, either by him/herself or through a representative.
- C. Anyone may file a complaint with the ARIZONA@WORK Northeastern Arizona EO Officer, the State of Arizona EO Officer, or the Civil Rights Center (CRC) Director if they believe that discriminatory actions have been taken by any of the above agencies listed in Section 704 (a) (i-iii).

804 TIMELY FILINGS

- A. For the purposes of these procedures, any complaint, appeal, applications, request, notice, objection, petition, report or other information is considered received and filed timely in accordance with the following:
 - i. A complaint must be filed within 180 days of the alleged occurrence.
 - ii. If transmitted via the United States Postal Service on the date it is mailed as shown by the postmark, or in the absence of a postmark the postage meter mark, on the envelope in which it is received; or
 - iii. If not postmark or postage meter marked, or if the mark is illegible, on the date it is actually received.
 - iv. If transmitted by any means other than the United States Postal Service on the date it is actually received.
 - v. If a delay in filing is due to an error or misinformation by the organizations or person with whom the complaint or appeal is filed, the time limitation shall be adjusted in a manner equitable to the complainant.
- B. In computing any period of time, the date of the act, event or default is not included. The last day of the period computed is counted, unless it is a Saturday, a Sunday, or a legal holiday, in which case the period runs until the end of the next day which is not a Saturday, a Sunday, or a legal holiday.
- C. If a complaint is filed with the State of Arizona, the complainant must wait either until the State of Arizona issues a written Notice of Final Action, or until 90 days have passed, (whichever is sooner), before filing a complaint with the Civil Right Center.
- D. If the State of Arizona does not give a written Notice of Final Action to the complainant within 90 days of the day on which the complaint was filed, the complainant does not have to wait for the State of Arizona to issue the Notice before filing a complaint with the CRC. However, the complainant must file the complaint with CRC within 30 days of the 90-day deadline (in other words, within 120 days after the day on which the complaint was filed with the State of Arizona).
- E. If the State of Arizona does give the complainant a written Notice of Final Action on the complaint, but the complainant is dissatisfied with the decision or resolution, the complainant may file a complaint with CRC. The complainant must file the complaint with CRC within 30 days of the date on which you received the Notice of Final Action.

805 FILING A COMPLAINT

- A. A complainant has the right to file a complaint with the ARIZONA@WORK Northeastern Arizona Equal Opportunity (EO) Officer; with the State WIOA EO Officer; or with the Director of Civil Rights Center (CRC).

ARIZONA@WORK Northeastern Arizona

Christopher Davis
Northeastern Arizona LWDA EO Officer
180 N. 9th Street
Show Low, AZ 85901 (928) 524-4327
christopher.a.davis@navajocountyaz.gov

State WIOA EO Officer Department of Economic Security 4000

N. Central Avenue, Suite 1550
Phoenix, AZ 85012
Phone: (602) 542-2487
Fax: (602) 542-2491
TTY/TTD 7-1-1
Email: WIOAStateEOOfficer@azdes.gov

Civil Rights Center (CRC)

Director, Civil Rights Center (CRC),
U.S. Department of Labor
200 Constitution Avenue NW, Room N-4123 Washington, DC
20210
Voice (202) 693-6502
TTY (202) 693-6515
CivilRightsCenter@dol.gov

- B. Should the complainant choose to file directly with the CRC Director, the ARIZONA@WORK Northeastern Arizona EO Officer will assist the complainant (if requested) in completing the Complaint Information Form.
- C. For those individuals' not requesting assistance, but needing forms, addresses, etc., the ARIZONA@WORK Northeastern Arizona EO Officer will provide the necessary U.S. Department of Labor Discrimination Information Form.
- D. Any partner staff can receive a customer complaint. Phone calls, faxes, e-mails, and letters are forms of customer complaints.

- E. Complaints are to be filed using the U.S. Department of Labor Complaint Form (DL I-2014a) found at <https://www.dol.gov/oasam/programs/crc/DL1-2014a-English.pdf> (see Exhibit 700A)
- F. All complaints that are filed at the place of service and received by a partner program staff member must be date stamped and routed to the ARIZONA@WORK Northeastern Arizona Equal Opportunity Officer within 24 hours of receipt.
- G. The staff member who receives the complaint shall communicate the following information to the ARIZONA@WORK Northeastern Arizona EO Officer:
 - i. A brief summary of the complaint.
 - ii. Causes and actions taken.
 - iii. Provide any supporting documentation.
 - iv. Name and contact information of the complainant and the staff member who received the complaint.
 - v. A completed Complaint Form DL I-2014a.
 - vi. Assurance that the complaint has been signed by either the complainant or the complainant's authorized representative.

806 LACK OF INFORMATION IN A FILED COMPLAINT:

- A. If a complaint does not contain enough information or required elements are not included in the complaint filed, the ARIZONA@WORK Northeastern Arizona EO Officer must try to obtain the needed information from the complainant. Efforts to reach the complainant must be documented and include telephone messages and e-mails.
- B. If after five days from the date of complaint, no response is received from the complainant, the EO Officer shall send written notice to the last known address requiring a response not more than 10 days from the date of the notice.
- C. The EO Officer may close the complainant's file, without prejudice, if:
 - i. Reasonable efforts have been made to try to find the complainant, but is unable to reach him or her; or
 - ii. The complainant does not provide the needed information to ARIZONA@WORK Northeastern Arizona within the time specified in the request for more information.
 - iii. If the complainant's file is closed, the EO Officer must send written notice to the complainant's last known address.

807 PROCESSING A COMPLAINT

- A. The ARIZONA@WORK Northeastern Arizona EO Officer will provide a written acknowledgment of receipt of the complaint to the complainant **within 5 days** with notice that the complainant has the right to be represented in the complaint process.
- B. Upon receipt of a complaint or information alleging discrimination, the EO Officer will:
 - i. Review the complaint for accuracy and completeness and enter it into the ARIZONA@WORK Northeastern Arizona Complaint Log;
 - ii. Initiate an investigation or fact-finding of the circumstances underlying the complaint. The investigation shall last no more than 14 calendar days;
 - iii. Provide written notice to all parties of the specific issues raised in the complaint;
 - iv. Provide a statement for each issue, either accepting the issue for investigation or rejecting the issue, and the reasons for each rejection;
 - v. Inform all parties of their right to representation by an attorney or other individual of their choice;
 - vi. Inform all parties of their right to present evidence;
 - vii. Inform all parties of their right to rebut evidence presented by others;
 - viii. Provide for a decision made strictly on the documented evidence.

808 COMPLAINTS BASED ON REASONS OTHER THAN DISCRIMINATION

- A. Based on information provided by the complainant, the EO Officer may declare that there is no jurisdiction over the complaint for one of more of the following reasons:
 - i. The basis for the complaint is not covered by the prohibitions of 29 CFR Part 38.
 - ii. The complaint is against an agency, employer, organization, program, or individual within an entity that is not a recipient of WIOA Title 1 financial assistance as defined in 29 CFR Part 38.4. The EO Officer will provide contact information of the appropriate agency or agencies which may have jurisdiction over the complaint, if known.
- B. A Notice of Lack of Jurisdiction (with one or more of the above reasons) will be provided in writing immediately upon the EO Officer discovering the lack of jurisdiction.
- C. The complainant has the right to file a program services complaint consistent with Section 716.

809 ALTERNATIVE DISPUTE RESOLUTION (ADR)

- A. The **State WIOA** EO Officer will contact the complainant in writing no later than 14 calendar days of receipt of the complaint to determine the complainant's willingness to mediate using the following alternative dispute resolution (ADR) procedures:
 - i. The choice whether to use the ADR or the customary process rests with the complainant;
 - ii. A party to any agreement reached under ADR may file a complaint with the CRC Director in the event the agreement is breached. In such circumstances, the following rules will apply:
 - a. The non-breaching party may file a complaint with the CRC Director within 30 days of the date on which the non-breaching party learns of the alleged breach;
 - b. The CRC Director will evaluate the circumstances to determine whether the agreement has been breached. If he/she determines that the agreement has been breached, the complainant may file a complaint with CRC Director based upon his/her original allegation(s), and the CRC Director may waive the time deadline for filing such a complaint.
- B. If the parties do not reach an agreement under ADR, the complainant may file a complaint with the CRC Director as described in Section CFR Section 38.71 through 38.74.

809.1 ALTERNATE DISPUTE RESOLUTION/MEDIATION PROCESS

- A. During the 90 calendar day period, complainants may elect to participate in mediation. If the complainant selects mediation, it allows disputes to be resolved in a less adversarial manner.
- B. The State WIOA EO Officer will coordinate with a preapproved mediator. The individual conducting the mediation must be a neutral and impartial third party who will act as a facilitator.
- C. The mediator must be a person who is acceptable to all parties including the State WIOA EO Officer and who will assist the parties in resolving their disputes.
- D. If the complainant chooses to participate in mediation, he/she or the authorized representative must respond to the State WIOA EO Officer in writing **within 10 calendar days** of the date of the request. This written acceptance must be dated and

signed by the complainant or authorized representative and must also include the relief sought.

- E. A written confirmation identifying the date, time and location of the initial mediation conference will be sent to all appropriate parties.
- F. A consent form will be signed by all parties at the initial mediation conference affirming that the contents of the mediation will be kept confidential.
- G. If resolution is reached under ADR/mediation, the agreement will be in writing. A copy of the signed agreement will be sent to the State WIOA EO Officer.
- H. If an agreement is reached under ADR/mediation but a party to the agreement believes his/her agreement has been breached, the non-breaching party may file a complaint with the CRC Director.
- I. If the parties do not reach resolution under ADR/mediation, the complainant will be advised of his/her right to file a complaint with the CRC/U.S.DOL; however, the ARIZONA@WORK Northeastern Arizona EO Officer will continue with the investigation.
- J. The mediation process should be completed within 45 calendar days of receipt of the complaint. This will assist in keeping within the 90 calendar day timeframe of the written Notice of Final Action if the mediation is not successful.

810 NOTICE OF FINAL ACTION

- C. The **State WIOA** EO Officer will provide a written Notice of Final Action to the complainant **within 90 days of the date on which the complaint was filed** that contains the following information:
 - i. For each issue raised in the complaint, a statement of either:
 - a. The decision on the issue and an explanation of the reasons underlying the decision, or
 - b. A description of the way the parties resolved the issue; and
 - ii. Notice that the complainant has a right to file a complaint with CRC Director within 30 days of the date on which the Notice of Final Action is issued if he/she is dissatisfied with the recipient's final action on the complaint.
- D. If, during the 90 day period, the State WIOA EO Officer issues its Notice of Final Action, but the complainant is dissatisfied with the decision on the complaint, the complainant or his/her representative may file a complaint with the CRC Director within 30 days after the date on which the complainant receives the Notice of Final

Action.

- E. If, by the end of 90 days from the date on which the complaint was filed, the State WIOA EO Officer has failed to issue a Notice of Final Action, the complainant or his/her representative may file a complaint with the CRC Director within 30 days of the expiration of the 90 day period. The complaint must be filed with the CRC Director within 120 days of the date on which the complaint was filed with the EO Officer.

811 CONFIDENTIALITY OF ALL COMPLAINTS

- A. All parties against whom the complaint is filed, will receive a copy of the complaint during the course of the investigation or alternative dispute resolution in order to allow the individual or entity the opportunity to respond to the allegation(s).
- B. The name of the complainant will only be released to the extent necessary to investigate and fairly determine the issues raised in the complaint.

812 INTIMIDATION AND RETALIATION PROHIBITED ON ALL COMPLAINTS

It is prohibited to discharge, intimidate, retaliate, threaten, coerce or discriminate against any person because such person has:

- A. Filed a complaint alleging a violation of WIOA or the regulations;
- B. Opposed a practice prohibited by the nondiscrimination and equal opportunity provisions of WIOA or the regulations;
- C. Furnished information to, assisted or participated in any manner in, an investigation, review, hearing or any other activity related to administration of, or exercise of authority under, or privilege secured by, the nondiscrimination and equal opportunity provisions of WIOA or the regulations; or
- D. Exercised authority under or privileges secured by the nondiscrimination and equal opportunity provisions of WIOA or the regulations.

813 RECORD RETENTION ALL COMPLAINTS

- A. All records of the complaint with supporting documentation, and corrective action will be maintained for six years from the date of ARIZONA@WORK Northeastern Arizona EO Officer receiving the complaint.
- B. A formal complaint log must be maintained to indicate date received, type of complaint, hearing date, summary of resolution and date resolved.

814 BACKGROUND – ALLEGED VIOLATIONS OF THE REQUIREMENTS OF TITLE I OF THE WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

- A. In order to ensure that all customers of the ARIZONA@WORK Northeastern Arizona are afforded the right to elevate concerns they have regarding alleged violations of the requirements of Title I of WIOA the following Complaints, Grievances, and Appeals Policy has been developed. The policy is meant to address the following: **Complaints based on a program applicant's or participant's** dissatisfaction with the level of service delivery from any of the programs offered as part of the ARIZONA@WORK Northeastern Arizona system.
- B. Nondiscrimination provisions found in Section 188 of the Workforce Innovation and Opportunity Act (WIOA), prohibit discrimination against applicants, beneficiaries and employees on the basis of race, color, national origin, age, disability, sex, religion, and political affiliation or belief, as well as against beneficiaries on the basis of citizenship and participation in WIOA. This is covered in policy section 701.

The following provision apply to this policy:

- i. Any interested person has a right to file a complaint.
- ii. Any complaint relating to a term or condition of employment shall be filed under the employer's established grievance procedures. All other complaints shall be initiated at the recipient level.
- iii. The right to file a complaint or appeal may not be limited or interfered with in any way
- iv. Representation of interested parties in connection with complaints or appeals may not be limited or interfered with in any way.
- v. All partner programs will make reasonable efforts to assure that the information will be understood by affected participants and other individuals, including youth and those who are limited-English speaking individuals.
- vi. The Arizona Department of Economic Security/Workforce Administration is required to establish and maintain a uniform system for accepting, investigating, resolving, and referring complaints and apparent violations through the Employment Service (ES) program. The following complaints are addressed per Employment Service policy:
 - a. **ES related** complaints involve complaints against an employer or the Employment Service;
 - b. **Non-ES related** complaints are complaints that are directed towards an employer or agency that is unrelated to any services provided through the One-Stop Career Center. Non-ES complaints typically involve an alleged violation of employment-related law and are referred to the appropriate labor enforcement agency; and

c. **Migrant and Seasonal Farmworker** complaints.

815 AUTHORITY

The policy contained in this manual is based on the following legal authorities. When necessary specific citations of the authorities will be referenced. Links to documents and websites are provided for direct reference.

- **Workforce Innovation and Opportunity Act (Public Law 113-128):**
<https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>
- **Federal Regulations:**
Note: The federal regulations governing the nondiscriminatory and equal opportunity clauses in the Workforce Innovation and Opportunity Act are still in draft form and provided as Notices of Proposed Rulemaking (NPRMs). Policies will be revised as needed when final federal regulations are issued and pending state board approval.
- U.S. Department of Labor Only NPRMs;
(Workforce Innovation and Opportunity Act; Notice of proposed Rulemaking (USDOL 20CFR 603.651-654.658.675.679-688))
- **State WIOA Policy and Procedure Manual**
<https://des.az.gov/services/employment/workforce-innovation-and-opportunity-act/policy-and-procedure-manual-workforce>
- Arizona Department of Economic Security Policy No. 1-01-14 and Procedure No. 1-01- 14-01
- Arizona Department of Economic Security Guidance Letter No. 06-06 (issued March 7, 2006)

816 DEFINITIONS

For the purposes of this policy:

- A. **Grievance** shall be a circumstance thought to be unjust and grounds for a complaint. A grievance may be a written or verbal description of an alleged violation of the WIOA, and may be dated and signed by an interested party.
- B. **Complaint** shall mean a formal charge or accusation. A complaint is a written description of an alleged violation of the WIOA, and must be dated and signed by an interested party.
- C. **An appeal** is any written, dated, and signed communication by an interested party expressing their intent to appeal any action or inaction with respect to a grievance or complaint to a higher level. Any action pursuant to the original decision is stayed until a final decision is made by the State.
- D. **Days** is interpreted as calendar days.

817 REASONS FOR FILING A PROGRAMMATIC COMPLAINT

Anyone who believes that a lack of service or *any negative action other than discrimination* has been taken by any of the following programs may file a complaint with the ARIZONA@WORK Equal Opportunity Officer:

- A. Any agency, organization, or business that receives any of the following types of Federal financial assistance:
 - i. Financial assistance under Title I of the Workforce Innovation and Opportunity Act (WIOA) Examples include:
 - a. WIOA programs for adults, youth, and dislocated workers
 - b. Federal employment and training programs for Native Americans and migrant and seasonal farm workers
 - ii. Financial assistance from the U.S. Department of Labor (DOL). These include grantees under grant programs administered by such DOL agencies as:
 - a. The Veterans' Employment and Training Service (VETS)
 - b. Any other DOL grant making agencies
 - iii. An American Job Center partner listed in WIOA Section 121(b) that offers programs or activities through the American Job Center system receiving financial assistance under Title I of the Workforce Innovation and Opportunity Act (WIOA) or under grant programs administered by DOL. Examples of programs that American Job Center partners must offer through the system include:
 - a. State employment services programs
 - b. Unemployment Insurance
 - c. The Senior Community Service Employment Program (SCSEP) for older workers.

818 TIMELY FILINGS

- A. For the purposes of these procedures, any complaint, appeal, applications, request, notice, objection, petition, report or other information is considered received and filed timely:
 - i. A complaint must be filed within 180 days of the alleged occurrence.
 - ii. If transmitted via the United States Postal Service on the date it is mailed as shown by the postmark, or in the absence of a postmark the postage meter mark, on the envelope in which it is received; or
 - iii. If not postmark or postage meter marked, or if the mark is illegible, on the date it is actually received.
 - iv. If transmitted by any means other than the United States Postal Service on the date it is actually received.
 - v. If a delay in filing is due to an error or misinformation by the organizations

or person with whom the complaint or appeal is filed, the time limitation shall be adjusted in a manner equitable to the complainant.

- B. In computing any period of time, the date of the act, event or default is not included. The last day of the period computed is counted, unless it is a Saturday, a Sunday, or a legal holiday, in which case the period runs until the end of the next day which is not a Saturday, a Sunday, or a legal holiday.

819 FILING A COMPLAINT

- A. Complaints may be filed at the location an ARIZONA@WORK Northeastern Arizona service was provided.
- B. An individual has the right to file a complaint with the ARIZONA@WORK Northeastern Arizona Equal Opportunity (EO) Officer for alleged violations of the requirements of Title I of WIOA as outlined in Section 719 with the ARIZONA@WORK Northeastern Arizona Equal Opportunity (EO) Officer.

Christopher Davis
Northeastern Arizona LWDA
180 N. 9th Street
Show Low, AZ 85901 (928) 524-4327
christopher.a.davis@navajocountyaz.gov

- C. Any partner staff can receive a customer complaint. Phone calls, faxes, e-mails, and letters are forms of customer complaints.
- D. Complaints are to be filed using the Alleged Violations of the Requirements of Title I of the Workforce Innovation and Opportunity Act (WIOA) form. (see Exhibit 700B)
- E. All complaints that are filed at the place of service and received by a partner program staff member must be date stamped and routed to the ARIZONA@WORK Northeastern Arizona Equal Opportunity Officer within 24 hours of receipt.
- F. The staff member who receives the complaint shall communicate the following information to the ARIZONA@WORK Northeastern Arizona EO Officer:
 - i. A brief summary of the complaint.
 - ii. Causes and actions taken.
 - iii. Provide any supporting documentation.
 - iv. Name and contact information of the complainant and the staff member who received the complaint.
 - v. A completed Complaint Form.

- vi. Assurance that the complaint has been signed by either the complainant or the complainant's authorized representative.

820 LACK OF INFORMATION IN A FILED COMPLAINT

- A. If a complaint does not contain enough information or required elements are not included in the complaint filed, the ARIZONA@WORK Northeastern Arizona EO Officer must try to obtain the needed information from the complainant. Efforts to reach the complainant must be documented and include telephone messages and e-mails.
- B. If after five days from the date of complaint, no response is received from the complainant, the EO Officer shall send written notice to the last known address requiring a response not more than 10 days from the date of the notice.
- C. The EO Officer may close the complainant's file, without prejudice, if:
 - i. Reasonable efforts have been made to try to find the complainant, but is unable to reach him or her; or
 - ii. The complainant does not provide the needed information to ARIZONA@WORK Northeastern Arizona within the time specified in the request for more information.
 - iii. If the complainant's file is closed, the EO Officer must send written notice to the complainant's last known address.

821 PROCESSING A COMPLAINT

- A. **Within three business days** of receiving the complaint, the ARIZONA@WORK Northeastern Arizona EO Officer will review the information and communicate the findings to the partner supervisor before making a determination regarding the complaint and any necessary corrective action.
- B. Upon receipt of a complaint or information alleging violations of the requirements of Title I of WIOA, the EO Officer will:
 - i. Review the complaint for accuracy and completeness and enter it into the ARIZONA@WORK Northeastern Arizona Complaint Log;
 - ii. Initiate an investigation or fact-finding of the circumstances underlying the complaint. The investigation shall last **no more than 14 calendar days**;
 - iii. Provide written notice to all parties of the specific issues raised in the complaint;
 - iv. Provide a statement for each issue, either accepting the issue for

- investigation or rejecting the issue, and the reasons for each rejection;
 - v. Inform all parties of their right to representation by an attorney or other individual of their choice;
 - vi. Inform all parties of their right to present evidence;
 - vii. Inform all parties of their right to rebut evidence presented by others;
 - viii. Provide for an informal resolution and a hearing to be completed **within 60 days** of the filing of the grievance or complaint.
- C. The ARIZONA@WORK Northeastern Arizona EO Officer will provide a written acknowledgment of receipt of the complaint to the complainant **within 5 days** with notice that the complainant has the right to be represented in the complaint process.
- D. If the complaint is not resolved, the complainant will be given the opportunity to request a hearing before an impartial hearing officer. Such hearing shall be **scheduled within thirty (30) days** of the filing of the complaint.
- E. Following the hearing and **within 60 days** of the filing of the complaint, all parties of interest will receive a copy of the final decision, which will include the reasons for the decisions.

822 APPEAL OF A COMPLAINT DECISION

Before any appeal process starts, informal resolution of the complaint will be attempted whenever possible. The ARIZONA@WORK Northeastern Arizona EO Officer will inform the complainant and all other partners in writing of the proposed resolution of the complaint within seven business days of the complaint.

Any party who has filed a complaint has the right to appeal to the State when no decision is reached within 60 days or either party is dissatisfied with the local hearing decision.

- A. The appeal must be filed within ten (10) days of the receipt of an adverse decision; or
- B. The appeal must be filed within ten (10) days from the date a decision should have been issued; or
- C. Any appeal filed after the tenth (10th) day following the decision is null and void.
- D. Appeals may be elevated to the Arizona Department of Economic Security per

823 CONFIDENTIALITY OF ALL COMPLAINTS

- A. All parties against whom the complaint is filed, will receive a copy of the complaint during the course of the investigation or alternative dispute resolution in order to allow the individual or entity the opportunity to respond to the allegation(s).
- B. The name of the complainant will only be released to the extent necessary to investigate and fairly determine the issues raised in the complaint.


824 INTIMIDATION AND RETALIATION PROHIBITED ON ALL COMPLAINTS

It is prohibited to discharge, intimidate, retaliate, threaten, coerce or discriminate against any person because such person has:

- A. Filed a complaint alleging a violation of WIOA or the regulations;
- B. Opposed a practice prohibited by the nondiscrimination and equal opportunity provisions of WIOA or the regulations;
- C. Furnished information to, assisted or participated in any manner in, an investigation, review, hearing or any other activity related to administration of, or exercise of authority under, or privilege secured by, the nondiscrimination and equal opportunity provisions of WIOA or the regulations; or
- D. Exercised authority under or privileges secured by the nondiscrimination and equal opportunity provisions of WIOA or the regulations.

825 RECORD RETENTION ALL COMPLAINTS

- A. All records of the complaint with supporting documentation, and corrective action will be maintained for six years from the date of ARIZONA@WORK Northeastern Arizona EO Officer receiving the complaint.
- B. A formal complaint log must be maintained to indicate date received, type of complaint, hearing date, summary of resolution and date resolved.

 <p>ARIZONA @WORK™ NORTHEASTERN ARIZONA A proud partner of the americanjobcenter network</p>	Effective Date:	Exhibit 200A – Youth Needing Additional Assistance Criteria
	Revision Date:	
Northeastern Arizona Local Workforce Development Board (Approval Authority)	Approval Date:	

Out of School Youth (OSY)		
In addition to meeting the low-income eligibility criteria, a youth who needs additional assistance may be eligible for WIOA Youth Services if one of the following criteria is met under this category:		
Section	Policy Provision	Documentation Needed
Poor Work History/Underemployed	Has poor, limited or no work history and/or sporadic employment and is no longer employed or is seeking employment for the last 2 months, but remains unemployed or underemployed.	<ul style="list-style-type: none"> ▪ Work History Form ▪ Case notes
Has Incarcerated Parent(s)	One or both parents is incarcerated	<ul style="list-style-type: none"> ▪ Legal Document ▪ Self-Attestation ▪ Case Note
Occupational Skills/ Further Education Deficiency	Lack of educational, occupational and/or technical training that reduces opportunities for gainful employment and causes income poverty; poor access to quality education and job opportunities	<ul style="list-style-type: none"> ▪ Work History Form ▪ Self-Attestation ▪ Case Note
Counseling Services	Is receiving or has received additional services through a licensed Counseling/Rehabilitation Agency.	<ul style="list-style-type: none"> ▪ Referral/Letter from Agency
In School Youth (ISY)		
In addition to meeting the low-income eligibility criteria, a youth who needs additional assistance may be eligible for WIOA Youth Services if one of the following criteria is met under this category:		
Section	Policy Provision	Documentation Needed
Poor School Attendance	Has displayed chronic poor attendance within the last school quarter and/or has an attendance rate of less than 85%.	<ul style="list-style-type: none"> ▪ School Record
Alternative Schooling	Is currently attending an alternative school/education program that leads to a High School Diploma or High School Equivalency.	<ul style="list-style-type: none"> ▪ School Record
At Risk of Drop Out	Is currently at risk of dropping out of school, as determined by referral from a school staff person, probation officer, or other responsible person with proper documentation and/or possesses unsatisfactory grades, GPA, and/or amount of credits.	<ul style="list-style-type: none"> ▪ School Record
School Disciplinary	Has received or is receiving continuous disciplinary actions and/or is under a type of academic probation.	<ul style="list-style-type: none"> ▪ School Record
Counseling Services	Is receiving or has received additional services through a licensed Counseling/Rehabilitation Agency.	<ul style="list-style-type: none"> ▪ Referral/Letter from Agency

WIOA TITLE IB

ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
SOCIAL SECURITY NUMBER <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> DD-214 (if name and SSN is shown) <input type="checkbox"/> Letter from social services agency (if name and SSN is shown) <input type="checkbox"/> Social Security benefits letter/notice (if name and SSN is shown) <input type="checkbox"/> Social Security card issued by SSA <input type="checkbox"/> Unemployment Insurance records(GUIDE 01 screen, wage statement) <input type="checkbox"/> Pay stub (if name and SSN is shown) <input type="checkbox"/> W-2 (if name and SSN is shown)	X	X	X
DATE OF BIRTH/AGE VERIFICATION <input type="checkbox"/> Documentation <u>MUST</u> be in file	<input type="checkbox"/> Baptismal record (if date of birth is shown) <input type="checkbox"/> Birth certificate <input type="checkbox"/> Certificate of Release or Discharge from Active Duty (DD-214), <input type="checkbox"/> Driver's license/state ID <input type="checkbox"/> Federal, state or local government ID card <input type="checkbox"/> Hospital record of birth <input type="checkbox"/> Passport <input type="checkbox"/> Public assistance/social service agency records (if name and DOB is shown) <input type="checkbox"/> School records/identification card (if name and DOB is shown) <input type="checkbox"/> Tribal records <input type="checkbox"/> Work permit <input type="checkbox"/> Cross match with Dept. of Vital Statistics	X	X	X
CITIZENSHIP OR ELIGIBLE TO WORK <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A All documents must be unexpired.	<input type="checkbox"/> Baptismal certificate that indicates birthplace <input type="checkbox"/> One verification source from List A on I-9 form (http://www.uscis.gov/sites/default/files/files/form/i-9.pdf) <input type="checkbox"/> One verification source from List B AND one verification source from List C (http://www.uscis.gov/sites/default/files/files/form/i-9.pdf)	X	X	X
SELECTIVE SERVICE STATUS <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Telephone verification (1-847-688-6888) <input type="checkbox"/> DD-214 <input type="checkbox"/> Selective Service registration record (Form 3A) <input type="checkbox"/> Selective Service verification form <input type="checkbox"/> Stamped post office receipt of registration <input type="checkbox"/> Internet www.sss.gov <input type="checkbox"/> Selective Service registration card <input type="checkbox"/> Selective Service advisory opinion letter	X	X	X

WIOA TITLE IB

ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
	<input type="checkbox"/> Exempt based on Selective Service guidance			
INDIVIDUALS WITH DISABILITIES <input type="checkbox"/> Documentation <u>MUST</u> be in file when an individual claims they have a disability. <input type="checkbox"/> N/A	<input type="checkbox"/> Letter from drug or alcohol rehabilitation agency <input type="checkbox"/> Medical records <input type="checkbox"/> Doctor's diagnosis/statement (physician, psychiatrist, or psychologist) <input type="checkbox"/> Rehabilitation evaluation <input type="checkbox"/> School records <input type="checkbox"/> Sheltered workshop certification <input type="checkbox"/> Social Security Administration disability records <input type="checkbox"/> Social service records/referral <input type="checkbox"/> Veteran's Administration letter/records <input type="checkbox"/> Vocational rehabilitation letter <input type="checkbox"/> Workers' compensation record	X	X	X
VETERAN STATUS OR SPOUSE OF A VETERAN <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> DD-214 <input type="checkbox"/> Cross Match with veterans data Spouse of a veteran: <input type="checkbox"/> Cross Match with veterans data <input type="checkbox"/> Military document (ID, other DD Form) indicating dependent spouse <input type="checkbox"/> Documentation (such as DD214) that indicates status of veteran that meets the requirement for "spouse of a veteran." Adults/DW/DWG exiters who received only basic career services (not individualized career or training services): <input type="checkbox"/> State MIS <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature <input type="checkbox"/> AJC case notes	X	X	X
EMPLOYMENT STATUS AT PARTICIPATION <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Pay stub <input type="checkbox"/> AJC case notes showing information collected from participant Adults/DW/DWG exiters who received only basic career services (not individualized career or training services): <input type="checkbox"/> State MIS <input type="checkbox"/> WIOA Applicant statement w/corroborating witness signature <input type="checkbox"/> AJC case notes	X	X	X

WIOA TITLE IB

ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
UI COMPENSATION PROGRAMS <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> UI Records (GUIDE 01 screen or 07 screen, letter from administration)	X	X	X
PELL GRANT <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Copy of check <input type="checkbox"/> Letter from school <input type="checkbox"/> Student aid report	X	X	X
HOMELESS INDIVIDUAL OR RUNAWAY YOUTH <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Written statement from a shelter or social service agency <input type="checkbox"/> Written statement from an individual providing temporary residence <input type="checkbox"/> WIOA Applicant statement w/corroborating witness signature <input type="checkbox"/> WIOA Application (signed by applicant)	X	X	X
OFFENDER <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Documentation from Juvenile or Adult Criminal Justice System <input type="checkbox"/> Documentation phone call with court representatives <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature <input type="checkbox"/> WIOA Application (signed by applicant)	X	X	X
INDIVIDUAL STATUS/FAMILY SIZE <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Court decree <input type="checkbox"/> Divorce decree <input type="checkbox"/> Disabled (Family of 1) <input type="checkbox"/> Landlord statement <input type="checkbox"/> Lease (if family size is given) <input type="checkbox"/> Native American tribal document <input type="checkbox"/> Public assistance/social service agency records <input type="checkbox"/> Public housing authority (if resident or on waiting list) <input type="checkbox"/> Written statement from publicly supported 24-hour facility <input type="checkbox"/> Most recent tax return <input type="checkbox"/> Birth Certificates <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature	X	X	
INDIVIDUAL/FAMILY INCOME	<input type="checkbox"/> Alimony agreement <input type="checkbox"/> Award letter from Veterans Administration	X (when	X	

WIOA TITLE IB ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
Validation <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Compensation award letter <input type="checkbox"/> Court award letter <input type="checkbox"/> Employer statement/contact <input type="checkbox"/> Family or business financial records <input type="checkbox"/> Housing authority verification <input type="checkbox"/> Pay stubs <input type="checkbox"/> Pension/annuity statement <input type="checkbox"/> Public assistance records <input type="checkbox"/> Quarterly estimated tax for self-employed persons <input type="checkbox"/> Social Security benefits <input type="checkbox"/> UI records (GUIDE 07 screen printout, wage statement) <input type="checkbox"/> Bank statements <input type="checkbox"/> WIOA Applicant Statement w/ corroborating witness signature Adults exiters who received only basic career services (not individualized or training services): <input type="checkbox"/> State MIS <input type="checkbox"/> WIOA Applicant Statement w/ corroborating witness signature <input type="checkbox"/> AJC case notes	income determination is required by policy)		
TEMPORARY ASSISTANCE TO NEEDY FAMILILES (TANF) <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Cross-match with TANF public assistance records Individual applying must be listed on current grant. Adults/DW/DWG exiters who received only basic career services (not individualized career or training services): <input type="checkbox"/> State MIS <input type="checkbox"/> WIOA Applicant statement w/corroborating witness signature <input type="checkbox"/> AJC case notes	X	X	
OTHER PUBLIC ASSISTANCE RECIPIENT OR LOW-INCOME STATUS <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<i>The applicant is receiving or has received cash assistance or other support services from the following sources (items A-D) in the last six months prior to participation in the program and must be listed on current grant or show dates of eligibility for benefits or lives in a high poverty area.</i> A. General Assistance	X	X	

WIOA TITLE IB ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
<p>A. General Assistance - state/local government</p> <p>B. Refugee Cash Assistance (RCA)</p> <p>C. Supplemental Nutrition Assistance Program (SNAP)</p> <p>D. Supplemental Security Income (SSI/SSA Title XVI)</p> <p>E. High-Poverty Area</p> <p>Note: Does not include foster care payments.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Authorization to receive cash public assistance <input type="checkbox"/> Copy of public assistance check <input type="checkbox"/> Medical card showing cash grant status <input type="checkbox"/> Public assistance records/printout <input type="checkbox"/> Agency award letter <input type="checkbox"/> Cross-match with public assistance database <p>B. Refugee Cash Assistance</p> <ul style="list-style-type: none"> <input type="checkbox"/> Refugee assistance records/printout <input type="checkbox"/> Authorization to receive cash public assistance <input type="checkbox"/> Copy of public assistance check <input type="checkbox"/> Medical card showing cash grant status <input type="checkbox"/> Public assistance records/printout <input type="checkbox"/> Cross-match with public assistance database <input type="checkbox"/> Agency award letter <p>C. Nutrition Assistance (formerly Food Stamp Program)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Tribal commodity program records/printout <input type="checkbox"/> Public assistance records/printouts <input type="checkbox"/> Cross-match with public assistance database <input type="checkbox"/> Agency award letter <p>Individual applying must be listed on current grant or show dates of eligibility within previous 6 months for benefits.</p> <p>D. Supplemental Security Income</p> <ul style="list-style-type: none"> <input type="checkbox"/> Authorization to receive cash public assistance <input type="checkbox"/> Copy of public assistance check <input type="checkbox"/> Medical card showing cash grant status <input type="checkbox"/> Public assistance records/printout <input type="checkbox"/> Agency award letter <input type="checkbox"/> Cross-match with public assistance database <p>Adults/DW/DWG exiters who received only basic career services (not individualized)</p>			

WIOA TITLE IB ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
	career or training services): <input type="checkbox"/> State MIS <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature <input type="checkbox"/> AJC case notes E. High-Poverty Area (for individuals in WIOA Youth program) <input type="checkbox"/> Printout from U.S. Census Bureau using the youth's address at http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t			
PREGNANT OR PARENTING YOUTH <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Child's baptismal record <input type="checkbox"/> Case notes regarding observable condition <input type="checkbox"/> Child's birth certificate <input type="checkbox"/> Doctor's note confirming pregnancy <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature	X		
YOUTH WHO NEED ADDITIONAL ASSISTANCE <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Case notes <input type="checkbox"/> Individual Service Strategy <input type="checkbox"/> See LWDA policy and plan <input type="checkbox"/> State MIS <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature <input type="checkbox"/> WIOA Application (signed by applicant)	X		
YOUTH IN FOSTER CARE <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> Court Records <input type="checkbox"/> Letter from group home <input type="checkbox"/> Arizona Department of Child Safety records <input type="checkbox"/> Telephone Verification <input type="checkbox"/> Verification of payments made on behalf of the child <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature	X		
EDUCATION STATUS AT TIME OF PARTICIPATION <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<u>Enrolled at time of participation</u> <input type="checkbox"/> School transcripts <input type="checkbox"/> Attendance records <input type="checkbox"/> School documentation <u>Out of School at time of participation</u> <input type="checkbox"/> High School Equivalency (HSE) diploma	X		

WIOA TITLE IB ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
	<input type="checkbox"/> High School diploma <input type="checkbox"/> Dropout letter <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature <input type="checkbox"/> WIOA Application (signed by applicant) <input type="checkbox"/> State MIS			
BASIC SKILLS DEFICIENCY <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A	<input type="checkbox"/> School records <input type="checkbox"/> TABE 9/10 Adult who received only basic career services (not individualized career or training services): <input type="checkbox"/> State MIS <input type="checkbox"/> WIOA Applicant statement w/corroborating witness signature <input type="checkbox"/> AJC case notes	X	X	
ENGLISH LANGUAGE LEARNER <input type="checkbox"/> Documentation <u>MUST</u> be in file N/A	<input type="checkbox"/> School records <input type="checkbox"/> TABE CLAS-E <input type="checkbox"/> AJC Case notes	X	X	
DISLOCATED WORKER (CATEGORY I)* <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A A. An individual, including recently separated U.S. veterans within 48 months after discharge or release from active duty, who has been terminated or laid off, or has received a notice of	<i>*One document each from item A, A (1) or A (2), AND A (3) is required.</i> A <input type="checkbox"/> DD-214 <input type="checkbox"/> National Guard Report of Separation and Record of Service (NGB22) <input type="checkbox"/> Military orders <input type="checkbox"/> Veterans Administration letter or records <input type="checkbox"/> Worker Adjustment and Retraining Notification Act (WARN) notice <input type="checkbox"/> Photocopy of a printed media article announcing layoff and must include the name of the media source and date of publication <input type="checkbox"/> Employer or union representative letter or statement <input type="checkbox"/> WIOA Applicant Statement			X

WIOA TITLE IB ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
<p>termination or layoff from employment; AND</p> <p>1. Is eligible for or has exhausted entitlement to Unemployment Insurance (UI) compensation, OR</p> <p>2. Has been employed for a duration sufficient to demonstrate attachment to the workforce (determined on a case-by-case basis by the LWDA), but is not eligible for unemployment compensation due to insufficient earning or having performed services for an employer that was not covered under state unemployment compensation law; AND</p> <p>3. Is unlikely to return to a previous industry or occupation.</p>	<p><u>A (1) or A (2)</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> UI records, including continued claim form (GUIDE 07 screen) <input type="checkbox"/> Verification of UI eligibility by UI office <input type="checkbox"/> DD-214 <input type="checkbox"/> National Guard Report of Separation and Record of Service (NGB22) <input type="checkbox"/> Military orders <input type="checkbox"/> Pay check stubs <input type="checkbox"/> W-2 and/or tax returns <input type="checkbox"/> Statement by the employer or union representative <input type="checkbox"/> WIOA Applicant Statement <p><u>A (3)</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> Labor market information that shows zero or negative growth rate for the industry or occupation <input type="checkbox"/> Employment Service confirms that in the previous sixty days there was a lack of job order for the occupation to qualified job seekers <input type="checkbox"/> The local Chamber of Commerce, Economic Development representative, or other credible sources of regional economic information confirms that occupation or industry has shown a significant employment decline in the local labor marker area <input type="checkbox"/> Notice that a plant closure or substantial layoff, within the labor market area in the same industry or occupation, has occurred in the last six months <input type="checkbox"/> WIOA Applicant Statement, stating that the individual has been actively seeking, but unable to find employment in their previous industry or occupation for a period of ninety days or more <input type="checkbox"/> DD-214, showing the individual was “separated” from active military duty under conditions other than dishonorable <input type="checkbox"/> Documentation from an employer or WIOA Applicant Statement stating the individual was laid off from their job due to lack of certification for the job from which they were laid off. 			
<p>DISLOCATED WORKER (CATEGORY II)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A 	<ul style="list-style-type: none"> <input type="checkbox"/> Photocopy of a printed media article announcing layoff and must include the name of the media source and date of publication <input type="checkbox"/> Employer or union representative statement <input type="checkbox"/> Worker Adjustment and Retraining Notification Act (WARN) notice <input type="checkbox"/> Verification from employer <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature 			X

WIOA TITLE IB ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
<ol style="list-style-type: none"> 1. Has been terminated or laid off, or has received a notice of termination or layoff from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise; or 2. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or 3. For purposes of eligibility to receive services other than training services, career services, or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close. 				
<p>DISLOCATED WORKER (CATEGORY III)</p> <p><input type="checkbox"/> Documentation <u>MUST</u> be in file</p> <p><input type="checkbox"/> N/A</p> <p>An individual who was self-employed (including employment as a farmer, rancher, or fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Bankruptcy documents listing both the name of the business and applicant's name <input type="checkbox"/> Business license <input type="checkbox"/> Completed Federal Income Tax Return (Schedule SE) for the most recent tax year <input type="checkbox"/> Photocopy of a printed media article announcing layoff and must include the name of the media source and date of publication <input type="checkbox"/> Copy of Articles of Incorporation for the business listing the applicant as a principal <input type="checkbox"/> WIOA Applicant Statement 			X

WIOA TITLE IB ELIGIBILITY CHECKLIST

CRITERIA	ACCEPTABLE VERIFICATION AND DOCUMENTATION Only one document from this column per eligibility criterion is required, unless otherwise stated.* Documentation must be collected prior to providing individualized or training services to participants in the WIOA Adult or DW program and prior to enrollment for participants in the WIOA Youth program.	YOUTH	ADULT	DW
disasters.				
DISLOCATED WORKER (CATEGORY IV) <input type="checkbox"/> Documentation <u>MUST</u> be in file <input type="checkbox"/> N/A An individual is a displaced homemaker (see definition of displaced homemaker at WIOA Section 3 (16).	<input type="checkbox"/> Bank records <input type="checkbox"/> Court records <input type="checkbox"/> Divorce decree <input type="checkbox"/> Public assistance records/printout <input type="checkbox"/> Spouse's layoff notice <input type="checkbox"/> Spouse's death certificate <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature DW/DWG exiters who received only basic career services (not individualized career or training services): <input type="checkbox"/> State MIS <input type="checkbox"/> WIOA Applicant Statement w/corroborating witness signature <input type="checkbox"/> AJC Case Notes			X

ARIZONA DEPARTMENT OF ECONOMIC SECURITY
NEAZIWS (Gila & Navajo)
70% LLSIL, 100% LLSIL and Self-Sufficiency
INCOME MATRIX FOR 2019

FAMILY SIZE	HHS Poverty Guidelines	70% LLSIL* METRO AREA	SELF-SUFFICIENCY for Adults* 200% LLSIL METRO AREA	SELF-SUFFICIENCY for Dislocated Workers* 200% LLSIL METRO AREA
1	\$12,490	\$11,292	\$32,264	\$32,264
2	\$16,910	\$18,507	\$52,876	\$52,876
3	\$21,330	\$25,409	\$72,598	\$72,598
4	\$25,750	\$31,367	\$89,618	\$89,618
5	\$30,170	\$37,013	\$105,752	\$105,752
6	\$34,590	\$43,292	\$123,690	\$123,690
7	\$39,010	\$49,571	\$141,628	\$141,628
8	\$43,430	\$55,850	\$159,566	\$159,566
Additional Per Person > 8	\$4,420	\$6,279	\$17,938	\$17,938

* All figures represent annual figures.

ARIZONA DEPARTMENT OF ECONOMIC SECURITY
Apache
70% LLSIL, 100% LLSIL and Self-Sufficiency
INCOME MATRIX FOR 2019

FAMILY SIZE	HHS Poverty Guidelines	70% LLSIL* NON-METRO AREA	100% LLSIL Used to determine self-sufficiency NON-METRO AREA	SELF-SUFFICIENCY for Adults* 200% LLSIL NON-METRO AREA	SELF-SUFFICIENCY for Dislocated Workers* 200% LLSIL NON-METRO AREA
1	\$12,490	\$11,144	\$15,920	\$31,840	\$31,840
2	\$16,910	\$18,263	\$26,090	\$52,180	\$52,180
3	\$21,330	\$25,075	\$32,877	\$65,754	\$65,754
4	\$25,750	\$30,950	\$40,580	\$81,160	\$81,160
5	\$30,170	\$36,528	\$47,894	\$95,788	\$95,788
6	\$32,580	\$42,720	\$56,013	\$112,026	\$112,026
7	\$36,730	\$44,892	\$64,132	\$128,264	\$128,264
8	\$40,890	\$50,575	\$72,251	\$144,502	\$144,502
Additional Per Person > 8	\$4,160	\$5,683	\$8,119	\$16,238	\$16,238

* All figures represent annual figures.

Determining High Poverty Census Tract in Arizona

Youth living in high poverty areas are automatically considered low income individuals. The Workforce Innovation and Opportunity Act of defines a high poverty area as a census tract, set of continuous census tracts, an American Indian reservation, Oklahoma Tribal Statistical area (as defined by U.S. Census Bureau), Alaska Native Village, or Alaska Native Regional Corporation Area, Native Hawaiian Village Homeland Area, or other tribal land as defined by the USDOL Secretary in guidance or county with a poverty rate of at least 25 percent, as set every five years using the American Community Survey five-year data.

To determine, if a youth lives in a high poverty area by census tract follow these steps:

1. Look up the youth's address on the United States Census Bureau American Factfinder webpage.

<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t>

2. Enter the youth's address and select the Go button. Select the blue Geographies Box on the left side of the screen.

The screenshot shows the American Factfinder website interface. On the left sidebar, there is a 'Geographies' box with a dropdown menu. A red arrow points to this box. In the center, there is a search form with fields for 'street address', 'city', 'state', and 'zip'. The 'state' dropdown is set to 'Arizona' and the 'zip' field contains '85008'. A 'GO' button is next to the zip field. Another red arrow points to this 'GO' button. Below the search form, there are instructions and a list of search results.

Exhibit 200F

- The fifth row in the first column of the Geography Results Table shows the census track number where the address is located.


The screenshot shows the American FactFinder website interface. The search results for "1789 W Jefferson St, Phoenix, AZ" are displayed. The "Geography Results" table is shown, with the following data:

Geography Name	Geography Type	Geography Code	Area
Arizona	State	340	2
Maricopa County, Arizona	County	340	2
Phoenix CCD, Maricopa County, Arizona	County Subdivision	340	2
Black 1025, Black (Single & Married) 1143.01, PHOENIX, AZ, 85007	Block	1143.01	2
Census Tract 1143.01, Phoenix, AZ	Census Tract	1143.01	2
Black Census Tract 1143.01, PHOENIX, AZ, 85007	Block Group within Census Tract	1143.01	2
Phoenix city, Arizona	Place within State	1143.01	2
Phoenix-Mesa-Glendale, AZ Metro Area	Metro Area Statistical Area	1143.01	2
Phoenix-Mesa, AZ MSA	MSA/MSA	1143.01	2
Phoenix-Mesa, AZ Urbanized Area (2010)	Urban Area	1143.01	2
Congressional District 9 (11th Congress), Arizona	Congressional District	1143.01	2
Congressional District 7 (11th Congress), Arizona	Congressional District	1143.01	2
State Senate District 10 (2010), Arizona	State Legislative District (upper)	1143.01	2
State House District 16 (2010), Arizona	State Legislative District (lower)	1143.01	2
DUNBAR Voting District, Maricopa County, Arizona	Voting District/precinct	1143.01	2

- Use High Poverty Census Tracts in Arizona Spreadsheet to determine if the census track where the youth lives is listed. The spreadsheet only lists census tracks in Arizona that have a poverty rate above 25 percent. If the census track where the youth lives is listed on the spreadsheet the youth lives in a high poverty areas and is considered to be a low-income individual.

<https://des.az.gov/sites/default/files/dl/WIA-1044AFORPD.pdf>

Note: In the example above, 1789 W Jefferson is located in Census Tract 1143.01. Census Tract is listed on the High Poverty Area in Arizona Spreadsheet and has a poverty level of 65 %. The youth, in this example lives in a high poverty area and is to be considered a low-income individual.

	Effective Date:	Exhibit 200G – Youth Incentives
	Revision Date:	
Northeastern Arizona Local Workforce Development Board (Approval Authority)	Approval Date:	

(14) Elements	Activity Description	Incentive Amount
Tutoring / Study Skills	4 tutoring sessions with attendance sheets	\$25.00
Drop Out Recovery / Alternative School	Completion of One GED Course/Semester Equivalent	\$100.00
Work Experience	Participants are Paid as Employees	N/A
Occupational Skills Training	Credential Bearing Programs/Completion of Semester	\$100.00
Workforce Preparation	Resume Writing/Interview Prep (workshop or one on one)	\$25.00
Support Services / Leading to ISS Goal Attainment	Support services with qualifying event (ex: interview clothes purchase followed by interview)	\$25.00
Adult Mentoring / Job Shadowing	Job shadowing prior to WEX (orientation), working with an adult mentor, continued follow up with CP	\$25.00
Follow-up Activities	Formal discussion of follow up procedures and end result of program participation	\$25.00
Guidance / Counseling / Referrals	2 academic advising sessions, mental health, substance abuse, etc with attendance sheets	\$25.00
Financial Literacy / Money Management	SmartAboutMoney.org packet, FDIC training	\$25.00
Entrepreneurial Skills Training	Small Business Workshops	\$25.00
Career Profile / Labor Market Analysis	3 Career Profile Worksheets with ONET follow up	\$25.00
Post-Secondary Education Transition Activities	College Ready courses	\$25.00

Northeastern Arizona Local Workforce Development Board Monitoring Corrective Action Plan

NAME OF ORGANIZATION:		PROGRAM NAME:		
Finding/Observation #1 (Identify the Finding/Observation to be addressed)				
Action Steps (Identify the specific action steps that will be implemented to address the stated Finding/Observation)	Responsible Lead Name of individual responsible for each action step	Start Date	Target Completion Date	Status (date): enter the status of each action step until completed. On a monthly basis until the entire plan is completed and accepted by the PCLWDB.
Finding/Observation #2 (Identify the Finding/Observation to be addressed)				
NOTE: Add additional sheets if needed				