

WIOA TITLE I ADULT & DISLOCATED WORKER POLICY GUIDE



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PARTNER4WORK PITTSBURGH, PA

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OVERVIEW

PARTNER4WORK

Partner4Work (P4W), formerly Three Rivers Workforce Investment Board, was established by the Workforce Investment Act of 1998 (WIA) and was later reauthorized by the Workforce Innovation and Opportunity Act in 2014 (WIOA). In its 20+ years, Partner4Work has delivered innovative solutions and supported local partners to develop a thriving workforce in Allegheny County and the City of Pittsburgh. From its initial focus as a small think tank, P4W has evolved its focus to include the development of strategic and systemic workforce solutions and funding key workforce partners including PA CareerLink(R) Allegheny County/Pittsburgh. With a budget comprised of public and private workforce funds, Partner4Work delivers a comprehensive portfolio of programs and initiatives to meet the current and future needs of employers and job seekers.

Our Vision

Partner4Work envisions a thriving and prosperous community, where all residents have access to expansive career opportunities and all businesses have access to a talented workforce.

Mission

To develop a thriving workforce, Partner4Work drives and delivers strategic investments, provides expertise, and creates opportunities for businesses, job seekers, agencies, and policymakers in Allegheny County and the City of Pittsburgh.

To find out more about Partner4Work: www.partner4work.org/

WIOA BACKGROUND

WIOA provides the framework for a national workforce preparation system that is flexible, responsive, employer-driven, customer-focused, and locally managed. The Act integrates workforce development programs to better respond to the employment needs of workforce system customers—employers and job seekers. The WIOA system is built around several key principles:

- **Streamlining Services:** Integrating multiple employment and training programs at the customer level through the one-stop delivery system to simplify and expand services for job seekers and employers.
- **Empowering Individuals:** Customers will be empowered to name the skills they possess and obtain the services and skills they need to enhance their employability.
- **Universal Access:** Through the one-stop system, every customer will have access to a set of core employment-related services.
- **Increased Accountability:** Providers of service will be held accountable for meeting employment-related performance measures.
- **Local Oversight:** Local boards (such as Partner4Work) with involvement from the private sector are responsible for program planning and oversight of the local system.
- **Local Flexibility:** WIOA provides local flexibility to improve and encourage innovative and comprehensive workforce investment systems. Local partners play a key role in policy development that is customized to meet the needs of local markets.
- **Improved Youth Programs:** WIOA seeks to expand youth programs by encouraging a close connection to the local labor market and communities with strong linkages between academic and occupational learning.

PURPOSE OF MANUAL

This manual provides policy and procedure guidance for Partner4Work (P4W) partners and subgrantees

delivering Workforce Innovation and Opportunity Act (WIOA) Title I Adult and Dislocated Worker programming and services in Allegheny County and the City of Pittsburgh. These policies are to be used when determining eligibility and providing services funded by WIOA; their implementation is the responsibility of Title I program and Partner4Work staff.

AUDIENCE/ RESPONSIBLE PARTIES

These policies apply to all Allegheny County/ Pittsburgh WIOA Title I Adult and Dislocated Worker participants and to individuals interested in enrolling in these programs.

Allegheny County/Pittsburgh WIOA Title I Adult and Dislocated Worker staff and Partner4Work staff are responsible for implementing these policies.

WIOA ADULT & DW ELIGIBILITY

This section ensures all Workforce Innovation and Opportunity Act (WIOA) [participants](#) in Allegheny County and the City of Pittsburgh who receive WIOA Adult and/or Dislocated Worker program funded services are eligible for and registered to receive those services.

ADULT

WIOA Title I Adult participants must meet basic eligibility requirements. These include:

- Be 18 years of age or older;
- Be a citizen or noncitizen authorized to work in the U.S.; and
- Meet [selective service](#) registration requirements (individuals assigned male at birth only, if applicable)

DISLOCATED WORKER

WIOA Title I Dislocated Worker participants must meet basic eligibility requirements. These include:

- Be 18 years of age or older;
- Be a citizen or noncitizen authorized to work in the U.S.; and
- Meet [selective service](#) registration requirements (individuals assigned male at birth only, if applicable)

WIOA Title I Dislocated Worker participants must also fit in one or more of the following five categories, as described in WIOA Section 3 (15):

- 1) Terminated/Laid Off; Eligible for unemployment compensation (UC) and Unlikely to Return
 - a. Has been terminated or laid off, or who has received a notice of termination or layoff, from employment, including separation notice from active military service (under other than dishonorable conditions); AND is eligible for or has exhausted entitlement to unemployment compensation; **AND** is unlikely to return to a previous industry or occupation; OR
 - b. Has been terminated or laid off, or who has received a notice of termination or layoff, from employment, including separation notice from active military service (under other than dishonorable conditions); AND Has been employed for a duration sufficient to demonstrate, to the appropriate entity at a one-stop center, attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a State unemployment compensation law; **AND** is unlikely to return to a previous industry or occupation.

- 2) Permanent Closure/Substantial Layoff/General Announcement of Employer Closure
 - a. 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, military installation, or enterprise;
 - b. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or
 - c. For purposes of eligibility to receive services other than [training services](#) described in WIOA section 134(c)(3), career services described in WIOA section 134(c)(2)(A)(xii), or [supportive services](#), is employed at a facility at which the employer has made a general announcement that such facility or military installation will close
- 3) Formerly Self-Employed/Currently Unemployed
 - a. Was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters
- 4) Displaced Homemaker
Defined as an individual who has been providing unpaid services to family members in the home and who
 - a. Is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment; and
 - b. Has been dependent on the income of another family member but is no longer supported by that income; or
 - c. Is the dependent spouse of a member of the Armed Forces on active duty and whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station, or the service-connected death or disability of the member.
- 5) Military Spouse
 - a. Is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code), 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
 - b. Is the spouse of a member of the Armed Forces on active duty and who also is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

Individuals who are working, but underemployed, may still meet the eligibility requirements for Adult, Adult [Priority of Service](#), and/or Dislocated Worker services if all other eligibility criteria are met. Please refer to Partner4Work's definition of "underemployed" [HERE](#).

SELECTIVE SERVICE

Individuals are required to register with Selective Service if they meet the following criteria:

- U.S. Citizen or Permanent Resident Non-Citizen;
- Between the ages of 18 and 26; and
- Assigned male at birth;

Qualifying individuals who failed to register with Selective Service by their 26th birthday and can provide written explanation and supporting documentation of any of the following may be eligible for WIOA services:

- Over the age of 26 and were willing but unknowing of the requirement to register with Selective Service;

- Incarceration, institutionalization, or hospitalization between the ages of 18-26; OR
- Non-citizen status and non-permanent resident status before age 26.

Partner4Work will monitor Selective Service exceptions to ensure that proper procedures are followed.

ELIGIBILITY REVIEW REQUIREMENTS

VERIFICATION AND DOCUMENTATION

WIOA Adult and Dislocated Worker staff must verify participant eligibility prior to the provision of services. It is the WIOA Adult and Dislocated Worker staff's responsibility to review and sign off on all registration paperwork for completeness and accuracy. Staff must maintain a centrally controlled file for each program applicant and registrant which contains copies of all eligibility documents collected. If documents are not uploaded to CWDS, the participant may be deemed ineligible for the program and all costs associated with them may be disallowed. WIOA Adult and Dislocated Worker staff will provide Federal, State, and Partner4Work monitors with access to such records given reasonable notice. The following differences between verification and documentation should be noted:

- **Verification** means to confirm eligibility requirements through examination of documents (e.g., birth certificates or public assistance records) or speaking with representatives of authorized agencies.
- **Documentation** means to maintain physical evidence, which is obtained during the verification process, in participant files. Examples of such evidence are copies of documents (where legally permitted).

Secondary Eligibility Review

To ensure accurate and compliant determinations under WIOA, all eligibility decisions must undergo a secondary staff review before enrollment. The primary reviewer is responsible for collecting and verifying all necessary documentation, while a secondary reviewer, such as a supervisor or authorized staff member, must conduct a second-level review to confirm accuracy and completeness before enrollment. This review must be clearly documented, including the name of the reviewer, their signature, the date of review, and any necessary corrections. Any secondary review documentation must be kept in the appropriate file. If discrepancies are found, the eligibility application must be returned for correction before approval, and all identified issues must be resolved prior to final enrollment. P4W will conduct regular monitoring to ensure adherence to this policy, and staff training will be provided as needed to maintain compliance.

Wagner-Peyser Prior to Adult/Dislocated Worker Services

Individuals whose WIOA Adult and/or Dislocated Worker eligibility is not yet determined may receive interim support from Wagner-Peyser, WIOA Title III services as they are universally available without eligibility requirements. Upon WIOA Adult and/or Dislocated Worker eligibility determination, participants may continue to receive Wagner-Peyser services, as well as services associated with the applicable WIOA Adult/Dislocated Worker programs.

Self-Certification

WIOA Adult/Dislocated Worker programs should consider [self-certification](#) as a viable alternative for populations whose life circumstances may preclude immediate access to certain eligibility documents. In compliance with federal and state policy requirements, self-certification may be used when document collection would delay or prevent a customer from enrolling into a program and moving ahead with services.

Self-certification should not be used as a primary source of verification if other documentation can be obtained without a significant delay or undue hardship to the participant. Other acceptable documentation or verification for the participant must be used if readily available or reasonably attainable. If self-certification is used, a case progress note must document the circumstances that necessitated the use of the self-certification including what action steps were taken to obtain other primary sources of documentation. Case progress notes must be entered into the state's sole system of record, the Commonwealth Workforce Development System (CWDS).

Sample case note: The WIOA self-certification form was submitted to verify "date of dislocation". The participant did not have any other documentation available to prove the date of dislocation. We are utilizing the self-certification form because no other options for verification are readily available or reasonably attainable.

Telephone Verification

Providers are encouraged to use telephone verification prior to [self-certification](#) for Adult and Dislocated Worker participants where practical. Telephone verification involves verification of eligibility criteria through phone calls with recognized governmental or social services agencies. Information obtained through this method should be documented on the attached **Telephone/Document Inspection Verification Form**. Information recorded must be adequate to enable a monitor or auditor to report back to the cognizant agency or the document used. In some cases, the information provided by the agency through telephone contact may be sufficient to satisfy multiple eligibility criteria. Verification of eligibility through document inspection is appropriate when documents cannot or may not be copied.

Random Sampling Methodology

To verify applicant self-certification usage, Partner4Work will adopt a random sampling methodology. The methodology will verify eligibility in self-certified applications and will be implemented for all WIOA Adult and Dislocated Worker programs.

Partner4Work estimates that less than 1% of participants report incorrect information when self-certifying eligibility criteria. For the purpose of ensuring the validity of self-certified data, Partner4Work will use a 90% confidence interval and 5% margin of error. A random sample of the population utilizing self-certification will be selected to verify if the information those individuals reported is correct. The size of the sample depends on the size of the population and is outlined in the table below.

Population will be measured by funding stream (e.g. Dislocated Worker) and not by individual provider. Participants selected through the random sampling methodology will be notified at the time of eligibility and required to provide additional eligibility documentation.

Population Size and Random Sample Size

Population Size	Random Sample Size
25	8
50	9
75	9
100	10
200	10
300	10
400	10
500	14
750	20
1000	26

If more than 10% of examined participants are found to be ineligible, Partner4Work will take corrective action, including providing technical assistance to providers utilizing [self-certification](#) as a form of eligibility

Self-Certification List:

Workforce staff must use self-certification in a manner reflective of this policy guide. Self-certification may be used for criteria elements including, but not limited to, the following:

- Date of Birth
- Individual with a Disability
- Veteran Status
- Low Income Status at Program Entry
- Homeless (Adult)
- Date of Actual Dislocation (Dislocated Worker)
- Displaced Homemaker (Dislocated Worker)
- Reemployment Opportunity is Poor/ Unlikely to Return-to-Work (Dislocated Worker)
- Permanently or Temporarily Laid Off as a Consequence of a Disaster (Disaster Grant Dislocated Worker Grant)
- Long-Term Unemployed (Disaster Dislocated Worker Grant)

For comprehensive detail and a listing on data validation and documentation requirements, including where self-certification may be used, review US Department of Labor Training and Employment Guidance Letter (TEGL) 23-19, Change 2, Guidance for Validating Required Performance Data Submitted by Grant Recipients of USDOL Workforce Program

PRIORITY OF SERVICE

Priority requirements are established within WIOA with respect to funds allocated toward WIOA Adult career and training services to ensure funds support veterans and individuals with barriers to employment. Individuals who fall within the categories listed below must be given priority for individualized career services and training services; priority does not apply to basic career services.

COVERED PERSON: “Covered Person” – as defined in section 2(a) of the Jobs for Veterans Act (JVA) of 2008 means a veteran or eligible spouse. A veteran is defined as a person who served at least one day in the active military, naval, or air service and who was discharged under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).

ELIGIBLE SPOUSE: “Eligible Spouse” - as defined in section 2(a) of the JVA means the spouse of any of the following individuals:

- 1) Any veteran who died of a service-connected disability;
- 2) Any member of the Armed Forces serving on active duty who, at the time of application for service under this section, is listed in one or more of the following categories and has been so listed for a total of more than 90 days: (I) missing in action; (II) captured in the line of duty by a hostile force or (III) forcibly detained or interned in line of duty by a foreign government or power;
- 3) Any veteran who has a total disability resulting from a service-connected disability as evaluated by the Department of Veterans Affairs;
- 4) Any veteran who died while having a disability, as indicated in bullet (3) of this definition was in existence.¹ A spouse whose eligibility is derived from a living veteran or service member (i.e.,

category 2 or 3 above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

REQUIREMENTS

For WIOA Adult program and training services, [priority](#) shall be given to [covered persons](#) and recipients of public assistance, [low income individuals](#), and individuals who are [basic skills deficient](#).

Priority must be provided in the following order:

- 1) First, to veterans and [eligible spouses](#) who are either recipients of public assistance, low-income, and/or basic skills deficient;
- 2) Second, to individuals who are not veterans or eligible spouses who are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient;
- 3) Third, to veterans and eligible spouses who are not recipients of public assistance, low-income individuals, or basic skills deficient;
- 4) Last, to non-covered persons who are not recipients of public assistance, low-income individuals, or basic skills deficient, but do meet Adult program eligibility requirements.

Individuals eligible for [priority of service](#) shall be identified at the point of entry, whether that is PA CareerLink® site, online self-service application, or other WIOA Title I Adult provider location. Upon identification they shall be notified of:

1. Their entitlement to priority of service;
2. The full array of programs and services available to them;
3. Any applicable eligibility requirements for those programs and services.

PA CareerLink® or other WIOA Title I Adult provider staff must ensure individuals who qualify for priority of service receive career and training services before other non-covered individuals and receive first priority on any waiting lists that are maintained for training slots. However, once a participant is enrolled in a workshop, training, or service, they may not be displaced by an individual qualified for priority of service.

Internal Monitoring

Understanding the Commonwealth goal of 50.1% of Adult participants from priority groups outlined in WSP- Priority of Service (April 28, 2022), Partner4Work will regularly monitor reporting on the percentage of Adult participants who fall into a priority of service category. Should the year-to-date percentage of priority populations served fall below 50.1%, Partner4Work will work with the WIOA Title I PA CareerLink® Operator and WIOA Title I Adult providers to identify areas for additional outreach to priority populations.

WIOA ADULT & DISCLOCATED WORKER SERVICES

WIOA provides for a workforce system that is accessible to all job seekers, customer centered, and training that is job-driven. The workforce system delivers career and [training services](#) at the nation's nearly 2,500 American Job Centers e.g., PA CareerLink®. Career services consist of three types: (1) Basic career services, (2) Individualized career services, and (3) Follow-up services.

- 1) **Basic career services** are universally accessible under [Wagner-Peyser](#), which provides eligibility for all job seekers authorized to work in the U.S. and must be made available to all individuals seeking employment and training services at PA CareerLink®. These include but are not limited to

eligibility determinations; initial skill assessments; labor exchange services such as job search, placement assistance, and career counseling; provision of information and assistance regarding the labor market. These services are also provided by WIOA Adult and Dislocated programs, for those determined eligible.

- 2) **Individualized career services**, specific to those enrolled in WIOA Adult and Dislocated Worker programming, are provided when PA CareerLink® staff determine that such services are required to retain or obtain employment. Individualized career services include services such as: specialized assessments, developing an individual employment plan (IEP), counseling, work experiences (including transitional jobs), etc. Once determined appropriate, these services will generally be provided by the Adult and Dislocated Worker programs.
- 3) **Follow-up services** must be provided, by state and local areas, to Adult and Dislocated Worker participants who are placed in unsubsidized employment, for up to 12 months after the first day of employment. The requirements of [Follow-Up Services](#) are included in a section below.

SUPPORTIVE SERVICES

Supportive Services are designed to provide participants with the resources necessary to enable their participation in WIOA career and/or training services. This section ensures appropriate and necessary [supportive services](#) to assist program [participants](#) are available.

SUPPORTIVE SERVICE REQUIREMENTS

The following are supportive service eligibility requirements for adult and dislocated workers:

- Participant must be a WIOA eligible Adult or Dislocated Worker.
- Participant must be participating in WIOA career services or [training services](#).
- Participant must be unable to obtain supportive services through other programs providing such services.

The WIOA Title I Adult, Dislocated Worker program staff should meet with each participant to assess the need for supportive services. Each participant should be given individualized case management services and plan development in order to eliminate possible dependency on supportive services. Supportive services awards should be based on individual participant needs and plan development. This information should be properly documented in the Individual Employment Plan and case notes in the Commonwealth Workforce Development System. Per WIOA, supportive services may only be awarded when necessary to enable participation in WIOA career services or training activities. A supportive service shall qualify as “necessary to enable participation in WIOA career services or training services” if staff determine, following a needs assessment and IEP development, that a supportive service would help a participant successfully participate in a WIOA activity and/or achieve a goal established in their IEP. P4W funds must be used in accordance with the requirements of the Federal Uniform Guidance and all other guidance and regulations applicable to the funding source.

WIOA funds are intended to be used to provide supportive services when they are not readily available through other resources and service providers. WIOA Title I Adult, Dislocated Worker, and Youth program staff are responsible for coordinating services and providing referrals to other state and local agencies offering supportive services. WIOA-funded supportive services shall be permitted, in accordance with this policy, if it is determined by WIOA program staff that a referral to other resources or service providers is not possible or cannot be made within the timeframe needed by the participant. Staff must provide documented proof of the service being unavailable in the area through other resources, such as PA 211 Southwest (<http://pa211sw.org/>). Additionally, staff must document the participant’s case notes that the service was confirmed as unavailable outside of WIOA.

WIOA SUPPORTIVE SERVICE AVAILABILITY

Partner4Work will only provide funding for the below list of supportive services to WIOA Adult and Dislocated Worker customers. WIOA Title I program staff will determine the need for supportive services and monitor the customer's progress and status to assess ongoing need.

- 1) **Transportation** – Supportive services funds may be used to cover certain transportation costs, including
 - a. Bus passes, not exceeding Pittsburgh Regional Transit monthly fare;
 - b. Gas cards, not exceeding \$75 per week. The amount allowable for assistance is determined by the mileage to and from work or training, confirmed by [Google Maps](#), at the [established federal rate](#). Mileage verification must be documented and maintained in the participant's file. Providers must use the table below for distribution:

Weekly Travel	5-30 miles	31-75 miles	76+ miles
Gas Card Amount	\$25	\$50	\$75

- c. Ridesharing (Uber, Lyft, etc.) vouchers, not exceeding \$60 per week. For a ridesharing voucher to be issued to a participant, one or more of the criteria below must be met. Service providers may refer to Pittsburgh Regional Transit public transportation schedules or other services (e.g. Google Maps) to verify and document that these criteria are met.
 - i. The overall travel time to/from the destination by public transit would be 1 hour or more in either direction;
 - ii. The public transit route to/from the destination would require more than one transfer in either direction;
 - iii. The final bus stop on the route (to/from) is more than 1/2 of a mile from the destination or does not have a clear pedestrian route to the destination (e.g. lack of sidewalks); or
 - iv. The bus schedule for the route (to/from) the destination would require a wait time of 30 minutes or more at a bus stop or shows no buses running during the required travel time.
- 2) **Childcare:** Participants may receive support for childcare expenses during hours required for participation when necessary for participation in services. To qualify, participants must first apply for support through the Pennsylvania Department of Human Services (DHS) subsidized childcare program, Child Care Works. The annual income for a family to be eligible to receive a subsidy is 200 percent or less of the Federal Poverty Income Guidelines (FPIG); work hour, education hour, and child age requirements must also be met.
 - a. Funds may be used to cover childcare costs when participating in this subsidized childcare program, including childcare costs incurred if placed on the waitlist for the program. Supportive services funding may also be used to provide support for childcare expenses for participants who meet income eligibility criteria for Child Care Works (PA's subsidized childcare program), but do not qualify based on other criteria.
 - b. Individuals disqualified from Child Care Works due to family income exceeding 200 percent may still qualify for supportive service funds if the following criteria are met.
 - i. Staff determine such resources are necessary to enable participation; and
 - ii. Participant family income falls under 300 percent of the FPIG.
- 3) **Clothing and/or uniform:** A WIOA participant may receive one (1) voucher for up to \$100 to purchase clothing and/or a uniform(s) necessary for participation in training, a job interview, or the first week of employment if these items are not provided by the training provider or employer.
- 4) **Equipment/tools:** A WIOA participant may receive one (1) voucher for up to \$250 to cover the

costs of tools and/or equipment necessary for participation in training or the first week of employment if these items are not provided by the training provider or employer.

- 5) **Driver's license or state identification card:** A WIOA participant may receive supportive services funds for one (1) instance of the cost of obtaining a state driver's license or identification card. Supportive service funds may not be used to pay for the costs of fines, penalties, or legal fees associated with obtaining or reinstating a driver's license.
- 6) **Non-employer paid licensing/certification or educational testing fees-** A WIOA participant may receive funding for a maximum of two (2) instances of the same license/certification or test utilizing WIOA supportive services dollars. WIOA Title I program staff will determine the need for licensing or testing through employer demand. The staff will make the necessary arrangements with the vendor for payment. The cost of GED testing and/or obtaining GED transcripts may be covered under this supportive services category.
- 7) **Drug Testing and/or TB Testing:** A WIOA participant may have one (1) instance of a drug test and/or TB test paid for through WIOA supportive services dollars.
- 8) **Criminal Background Checks and/or Clearances—** A WIOA participant may have one (1) instance of obtaining a criminal background check and/or clearances necessary to begin employment and/or education paid through WIOA supportive services dollars. This includes one (1) instance of each of the following: Pennsylvania Child Abuse History Clearance, Pennsylvania State Police Criminal Record Checks, and Federal Bureau of Investigations (FBI) Criminal History Background Check.
- 9) **Unions and Registered Apprenticeships Fees:** A WIOA participant applying to a union and/or registered apprenticeship may receive assistance for non-employer paid, non-refundable costs required for initial admittance or participation in the program. These costs may include application fees, initial dues (one month only), and/or required clothing/shoes. Supportive services funds may only be used if the expenses are a requirement for participation in training and/or a reasonable condition of employment.
- 10) **Reasonable accommodations for individuals with disabilities —**WIOA supportive services dollars may only be used as the funding of last resort for these accommodations.

DISALLOWED SUPPORTIVE SERVICES

The following are prohibited to be purchased with WIOA supportive service funds. This list is not exhaustive.

- Supportive services purchased prior to the participant's program enrollment.
- Fines and penalties such as traffic violations, late fees, and interest payments.
- Entertainment, including tips.
- Contributions or donations.
- Titled or deeded items or when recovery of the expense is anticipated.
 - Examples include: Rent or housing deposits, mortgage payments, homeowners insurance, property taxes, car payments, purchase of vehicles
- Alcohol or tobacco products.

SERVICE CODES FOR SUPPORTIVE SERVICES

Each supportive service provided has a corresponding service code, which you will find below to ensure accurate entry into CWDS.

WSS01	Transportation
WSS02	Childcare
WSS03	Dependent Care
WSS04	Housing

WSS05	Needs Related Payments
WSS06	Needs Based Payments
WSS07	Stipend
WSS08	Assistance With Uniforms Or Other Appropriate Work Attire and Work-Related Tool Costs, Including Such Items As Eyeglasses and Protective Eye Gear
WSS09	Other 1 - Driver's License & State Identification Card
WSS10	Other 2 - Non-employer paid licensing/certification or educational testing fees or Drug Testing and/or TB Testing
WSS11	Other 3 - Criminal Background Checks and/or Clearances
WSS12	Other 4 - Unions and Registered Apprenticeships Fees
WSS13	Other 5 - Reasonable accommodations for individuals with disabilities

SELF-SUFFICIENCY

The term “self-sufficiency” refers to the level of income a person or family must be below in order to be eligible for certain WIOA services. To qualify for a WIOA-funded training service, it must be determined that a client is unlikely or unable to obtain or retain employment at the self-sufficiency wage or wages comparable to or higher than wages from previous employment through career services alone.

WIOA requires Partner4Work to set the criteria for determining whether employment leads to a self-sufficient wage; Partner4Work has set the criteria for [self-sufficiency](#) at 250% of the Federal Poverty Guidelines. An individual in Allegheny County or City of Pittsburgh will be determined to be earning below the self-sufficiency [wage](#) if the following criteria are met:

1. The individual's gross earned income is not above 250% of the Federal Poverty Guidelines; and
2. The individual is a member of a [family](#) whose combined gross earned income is not above 250% of the Federal Poverty Guidelines for its actual family size.

The chart shows family size and the 250% Federal Poverty Guidelines levels (2025)

Household Size	Federal Poverty Guideline (FPG)	250% of FPG	Hourly Self-Sufficiency Wage
1	\$ 15,650	\$ 39,125	\$ 18.81
2	\$ 21,150	\$ 52,875	\$ 25.42
3	\$ 26,650	\$ 66,625	\$ 32.03
4	\$ 32,150	\$ 80,375	\$ 38.64
5	\$ 37,650	\$ 94,125	\$ 45.25
6	\$ 43,150	\$ 107,875	\$ 51.86
7	\$ 48,650	\$ 121,625	\$ 58.47
8	\$ 54,150	\$ 135,375	\$ 65.08

The Self Sufficiency Wage, effective 01/24/2025, is \$ 18.81/hour for a family of one (1).

TRANSITIONAL JOBS

[Transitional Jobs \(TJ\)](#) are part of a portfolio of training and employment services available to job seekers in Allegheny County and the City of Pittsburgh. TJ seek to connect individuals with [chronic unemployment](#)

[or an inconsistent work history](#) with opportunities to build workplace skills and job history through time-limited and wage-paid experiences. These jobs are in the public, private, and nonprofit sectors and are subsidized up to 100 percent. Requirements for employers participating in a TJ are outlined in this section.

REQUIREMENTS

Participant Eligibility

For an individual to qualify for TJ under the WIOA guidelines, they will:

1. Have enrolled with PA CareerLink® Pittsburgh/Allegheny County WIOA Adult or Dislocated Worker programs.
2. Have completed an initial assessment and have been determined to be an individual with a [barrier to employment](#) and a history of [chronic unemployment or an inconsistent work history](#). Assessment tools must be approved in advance by Partner4Work staff. Supporting documentation proving eligibility is required; additional information can be found in the eligibility section.

Employer Eligibility

Potentially eligible employers able to participate as a TJ placement site include: private-for-profit businesses, private non-profit organizations, and public sector employers. An employer will NOT be eligible to participate as a WIOA TJ placement site if:

1. The employer has any other individual on layoff from the same or substantially equivalent position.
2. The TJ would infringe upon the promotion of or displacement of any currently employed worker or a reduction in their hours.
3. The same or a substantially equivalent position is open due to a hiring freeze.

General WIOA TJ Requirements

1. TJ must be combined with comprehensive career services and [supportive services](#).
2. TJ placements should contribute to the occupational development and upward mobility of the participant.
3. Per WIOA regulations (20 CFR 683.200(g)), “no individual may be placed in an employment activity if a member of that person’s immediate family is directly supervised by or directly supervises that individual.” For the purpose of this policy, the term “immediate family” includes a spouse, child, son-in-law, daughter in-law, parent, mother-in-law, father-in-law, sibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, and grandchild.
4. There is no expectation that the employer providing the TJ placement will hire the participant permanently.

WIOA TJ Length

TJ must be time limited (no more than 6 months and preferably 8 to 12 weeks) and require at least fifteen (15) but not more than forty (40) hours of work per week.

WIOA TJ Funding Levels

All TJ placements must pay at least the minimum wage (\$7.25/hr. at the effective date of this policy). Partner4Work TJ funds may be used to pay up to \$10.00/hr. of wages earned by a [participant](#). Providers are encouraged to develop TJ placements that pay a self-sustaining wage, as defined by [Partner4Work’s Self-Sufficiency Policy](#), and leverage additional funding to offset this cost.

The total cost per participant for a TJ will be set contractually. Per participant cost levels will take into consideration both participant [wages](#) and [supportive services](#).

TJ Provider Requirements

With assistance from PA CareerLink® Pittsburgh/Allegheny County staff, participating employers must guarantee that:

1. Employees who have financial responsibilities related to the receipt and disbursement of funding under the Agreement shall be covered by fidelity bonding.
2. The training to be provided will be in accordance with WIOA 181(a)(1)(A) and 683.275 for wage and labor standards. Worker protection requirements are set forth in WIOA Sections 181(a) (1) (A) and (B), (b) (2), (3), (4) and (5) and 188.
3. The host site and provider agree to cooperate with monitoring efforts as required by WIOA legislation and adhere to all other applicable local, state, and federal rules and regulations.
4. Funds are not used to directly or indirectly assist, promote, or deter union organizing.
5. The employer agrees to respond to Partner4Work/PA CareerLink® Pittsburgh/Allegheny County staff requests for wage and retention information of participants.
6. If the participating employer(s) has recently relocated, resulting in the loss of employment of any employee of such business at the original location in the U.S., TJ placements may not be granted to the employer(s) until after 120 days have passed since the relocation.

WIOA ADULT & DW TRAINING SERVICES

WIOA is designed to increase participant access to training services, recognizing these are critical to employment success; training services are provided to prepare job seekers to enter the workforce and retain employment.

All WIOA training services have a general eligibility requirement, determined by staff of PA CareerLink® or a program partner: training services may be provided if, after conducting an interview, an evaluation, or assessment, and career planning, that the individual:

- Is 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 only;
- Is in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment;
- Has the skills and qualifications to participate successfully in training services; and
- Is unable to obtain grant assistance from other sources to pay for the cost of such training.

Program providers will also use interviews, evaluations, or assessments to determine suitability, which relates to a participant's assessed ability and perceived commitment to attend training activities, successfully complete a training program, and to get and keep employment related to training.

WIOA training services include: (1) Individual Training Accounts (ITAs) (2) On-the-Job Training (OJT), (3) Customized Job Training (CJT), and (4) Incumbent Worker Training (IWT). Partner4Work also contracts directly with training providers to facilitate training cohorts of individuals for jobs in in-demand sectors or occupations through the [Industry Recognized Training Pipeline \(IRTP\)](#).

- 1) **Individual Training Accounts (ITAs)** are the primary method used in the provision of WIOA services. These act as a voucher that can be used to pay for an approved training program of the participant's choice.
- 2) **On-the Job Training**, also known as OJT, allows employers to offer training to participants while engaged in productive work by subsidizing part of the participant's wages during the OJT period, with the expectation that the participant will continue to work for the employer once the OJT is completed.
- 3) **Customized Job Training (CJT)** is defined as training by an employer or employers or by a training provider in conjunction with an employer that is provided to five or more paid participants concurrently while engaged in productive work.
- 4) **Incumbent Worker Training (IWT)** is defined as training by an employer or training provider in close partnership with an employer that is provided to paid participants who have an established employment history with the employer for 6 months or more.

INDIVIDUAL TRAINING ACCOUNT (ITA)

Briefly introduced above, an "[individual training account](#)" is a funding mechanism through which eligible individuals can access quality training programs that appear on the [Eligible Training Provider List \(ETPL\)](#) to help obtain employment in High Priority Occupations (HPOs). ITA funding is not guaranteed to any [participant](#) and is contingent on funding availability.

Participant Eligibility

In addition to the training program eligibility requirements above, the following criteria must be met:

- Students are required to complete financial aid forms if the program qualifies. Pell, PHEAA, and related grants can be utilized concurrently with WIOA ITA funds but should be used before ITA funds when the participant qualifies.
- Students must first be considered eligible and appropriate for training. If the training program selected is greater than the approved amount, the student must indicate how the remaining costs of training will be funded.
- ITAs will not be issued to any student who does not have a high school diploma, GED, or equivalent.
 - NOTE: ITAs will be considered for participants without a diploma or GED if they are simultaneously enrolled in a program to obtain these credentials (such as with our Adult Ed partners).
- ITA applications should be submitted to Partner4Work at least one week prior to the training start date for review and approval.

ITA Funding

The maximum amount of funding a participant may receive per ITA is as follows:

- Up to \$3,750 per ITA for Commercial Driver's License (CDL) programs.
- Up to \$5,000 per ITA for training programs (excluding CDL programs).

ITA funding will be issued based on training program enrollment/start and program completion. Training providers will receive 50% of the total ITA funding amount when a participant successfully enrolls into and begins an approved training program. Training providers will receive the remaining 50% of the total ITA funding amount when a participant successfully completes the approved training program. Information on this payment structure is further described in the training provider vendor agreement.

A maximum of 30 individual training accounts may be issued per training program on the Eligible Training Provider List (ETPL) during a 12-month program year (July - June). Actual ITA funding amounts will be

determined through the ITA agreement established with the training provider.

Maximum Duration Limit of ITA

ITAs will be valid for up to two years. Under limited circumstances, a person may qualify for more than one ITA. An assessment must determine additional ITA-funded training is necessary, the training must be connected to an HPO along a career pathway, and individuals must have completed all prior ITA-funded training. Additional ITA-funded training requires prior approval from Partner4Work. All other requirements of this policy apply to the initial and additional ITAs awarded to an individual.

Expenses an ITA Will Cover

ITAs may be spent on tuition, fees, books, and school supplies (if the books and supplies are required by the school).

Trainings covered by ITAs

Before awarding an ITA, PA CareerLink® staff should engage in employer conversations to confirm there are job placements available after a participant completes training. ITAs will be awarded to quality training programs that appear on the ETPL in HPOs that require less than a bachelor's degree. However, Registered Apprenticeships on the ETPL are not required to be training in an HPO and may still qualify for an ITA.

ITAs are designed to get people back into the labor force quickly. An occupation requiring a bachelor's degree or higher education is no longer eligible to receive ITA funding.

If a customer is within range of a bachelor's degree that can be achieved in the two year timeframe of an ITA and the customer can indicate how the remaining costs of training will be funded, the PA CareerLink® staff will discuss an exception basis for the customer.

Priority in ITA funding will be given to training programs providing an industry-recognized credential. Registered Apprenticeships listed on the ETPL qualify for ITA funding; participants are encouraged to consider an Apprenticeship as a viable career pathway.

ITAs should align with key industry sectors identified by Partner4Work. Partner4Work and the WIOA Title I Adult/Dislocated Worker provider(s) at PA CareerLink® Pittsburgh/Allegheny County will work to align training funds across programs to ensure a broad portfolio of strong training options.

Local workforce development boards (LWDBs) may set more stringent performance standards for training providers than the statewide minimum. Partner4Work has a commitment to ensuring that training providers offer high-quality training that will best prepare individuals to succeed in the workforce. For this reason, while participants may choose the training provider on the ETPL that best meets their needs, ITA funding for training providers on the statewide list not approved by Partner4Work must meet Partner4Work's local ETPL standards and receive written approval from Partner4Work prior to receiving ITA funding.

WORK-BASED TRAINING

Work-based training is designed to benefit job seekers by making training available to them while they are earning a wage on the job and employers by subsidizing training costs. Contracts for OJT, CJT, and IWT also require:

1. A commitment to hire participant in full-time employment at the self-sufficiency wage following training completion, among other employer assurances;
2. A limited training duration, necessary for the occupation and determined using O*NET data;
3. General [employer eligibility guidelines](#).

OJT, CJT, and IWT dollars should be prioritized for programs leading to employment in an HPO and/or in-demand industry/sector enabling the participant to become economically self-sufficient, and which will contribute to the occupational development and upward mobility of the participant. P4W will prioritize work-based training to programs aligned with our industry partnerships, including Construction, Financial Services, Healthcare, Information Technology, Manufacturing, Public Sector and Education, Retail and Hospitality, and Transportation and Logistics. The current [HPO List](#) for Pittsburgh/Allegheny County is available at [Partner4Work.org](#).

Training Length

The maximum time frame for OJT, CJT, and IWT is 6 months. Duration is a function of training needed, not the maximum allowed under the policy. Business services staff should consult with the employer and utilize Occupational Information Network's (ONET) Specific Vocational Preparation Range (SVP) to determine the appropriate occupational training needed.

Using the Specific Vocational Preparation (SVP) component provided by [ONET](#), the following duration times are recommended in addition to the participants past skill and experience.

LEVEL	TIMEFRAME
Level 1	<1 month
Level 2	1 month
Level 3	>1 month – 3 months
Level 4	>3 months – 6 months
Level 5	>6 months
Level 6	>6 months
Level 7	>6 months
Level 8	>6 months
Level 9	>6 months

Employer Eligibility, Requirements, & Assurances

Employers may qualify to participate in OJT, CJT, or IWT contracting if it is determined that they meet the following criteria:

Eligible Employer Types

- Private-for-profit business;
- Private non-profit organization; or
- Public sector employer

Employer Restrictions

An employer will not be eligible to participate in a [CJT](#), [IWT](#), or [OJT](#) if:

- The employer has any other individual on layoff from the same or substantially equivalent position.
- The training would infringe upon the promotion of or displacement of any currently employed worker or create a reduction in their hours.
- The same or a substantially equivalent position is open due to a hiring freeze.
- The positions are for seasonal employment.
- The employer is a private for-profit employment agency, i.e. temporary employment agency, employee leasing firm, or staffing agency.
- The position is not full time, i.e. minimum of 32 hours per week.
- The employer has previously exhibited a pattern of failing to provide training participants with

continued long-term employment with [wages](#), benefits and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are doing the same type of work.

Employer Assurances

With assistance from Partner4Work staff, participating employers must guarantee that:

- All participants shall be provided benefits and working conditions at the same level and to the same extent as other employees working a similar length of time and doing the same type of work. This will include UC coverage where the employer is normally required to provide such coverage to its employees.
- The position provides the participant benefits per company policy (i.e. insurance, paid leave, profit sharing) other than those required by law.
- Employees who have financial responsibilities related to the receipt and disbursement of funding under the Agreement shall be covered by fidelity bonding.
- The training to be provided will be in accordance with WIOA 181(a)(1)(A) and 683.275 for wage and labor standards. Worker protection requirements are set forth in WIOA Sections 181(a) (1) (A) and (B), (b) (2), (3), (4) and (5) and 188.
 - The employer agrees to cooperate with monitoring efforts as required by WIOA legislation and adhere to all other applicable local, state, and federal rules and regulations.
- Funds are not used to directly or indirectly assist, promote, or deter union organizing.
- The employer agrees to respond to Partner4Work/PA CareerLink® Pittsburgh/Allegheny County staff requests for wage and retention information of participants.
- The employer commits to retain the trained employees for a period of six months following the completion of training. Failure to do so may result in the employer being ineligible to receive further Partner4Work training funds for a period of one year.
- If the participating employer(s) has recently relocated, resulting in the loss of employment of any employee of such business at the original location in the U.S., on-the-job training contracts may not be granted to the employer until after 120 days have passed since the relocation.

General Program Requirements

- Contracts will generally not be written for low-skill jobs that generally would require little or no training.
- At the time of completion of the work-based training program, individuals must be employed in occupations that meet the following criteria:
 - Hourly wage must be at the [self-sufficiency](#) wage;
 - The occupations must be a full-time permanent position following the training (minimum of 32 hours per week).
- Per WIOA regulations, “no individual may be placed in an employment activity if a member of that person’s immediate family is directly supervised by or directly supervises that individual.” For this purpose, the term “immediate family” includes a spouse, child, son-in-law, daughter in-law, parent, mother-in-law, father-in-law, sibling, brother-in-law, sister-in-law, aunt, uncle, niece, nephew, stepparent, stepchild, grandparent, and grandchild.

ON THE JOB TRAINING (OJT)

[On-the-Job Training](#) (OJT) serves the basic purpose of encouraging employers to hire or up-grade an eligible individual, providing the skills and competencies for a position the participant would not qualify for otherwise. While the job-seeker benefits by earning a wage while learning in a hands-on environment,

employer benefits through increased staff capacity and productivity. OJT provides the employer with partial wage-rate reimbursement in exchange for self-designed, occupational training and related supervision.

Programs training five or more individuals within a single quarter or three-month period must meet the requirements for [customized job training](#) (CJT) rather than OJT.

OJT Funding Levels

Employers will be reimbursed 50 percent of a participant's wage per hour. While participants may be paid a higher hourly wage, employers will only receive 50 percent reimbursement for up to \$20/hour of a participant's wage. The maximum amount an employer may receive is \$10,000 per trained individual. Partner4Work will consider an increase in the reimbursement rate (up to 75 percent) and funding cap taking into consideration one or more of the following factors:

- Size of the employer(s) with an emphasis on small businesses;
- The characteristics of the participants taking into consideration whether they are individuals with barriers to employment;
- The quality of employer-provided training and advancement opportunities. For example, if the OJT contract is for an in-demand occupation and will lead to an industry-recognized credential;
- Wage and benefit levels of employees (at present and anticipated upon completion of training);
- Other relevant factors, as appropriate.

The [policy exceptions form](#) may be used to request an increase based on the criteria above.

CUSTOMIZED JOB TRAINING (CJT)

Similar in its design to meet the specific requirements of the employer, CJTs differ from an on-the-job training (OJT) contract based on:

1. **Volume:** An employer or group of employers requiring more than five of the same/similar positions filled
2. **Complexity:** CJT trains each participant for the same skill set rather than individualized job skills

CJT Funding Levels

Participating employers must pay a significant cost of the CJT training. This payment can be in cash or in-kind services. CJT funding cannot be used for the wages of [incumbent workers](#) while they participate in training but may be used to fund the cost of administering the training, including the wages of the trainer. The wages of unemployed individuals hired as a result of CJT funding availability are eligible to be reimbursed through CJT funding.

Companies will be reimbursed at 50 percent of the cost of training. The maximum amount a company may receive is \$5,000 per trained individual. Partner4Work will consider an increase in the reimbursement rate (up to 75%) and funding cap taking into consideration one or more of the following factors:

- Size of the employer(s) with an emphasis on small businesses;
- The characteristics of the participants taking into consideration whether they are individuals with barriers to employment;
- The quality of employer-provided training and advancement opportunities, for example if the CJT contract is for an in-demand occupation and will lead to an industry-recognized credential;
- Wage and benefit levels of employees (at present and anticipated upon completion of training);
- Other relevant factors, as appropriate.

The [policy exceptions form](#) may be used to request an increase based on the criteria above.

INCUMBENT WORKER TRAINING (IWT)

IWT is designed to meet the needs of an employer or group of employers to retain a skilled workforce or avert layoffs. IWT is not permitted to be used to provide the occupational training needed by a new hire. Incumbent Worker Training can be used to either:

- Help avert potential layoffs of employees; or
- Obtain the skills necessary to retain employment, such as increasing the skill levels of employees so they can be promoted within the company and create backfill opportunities for new or less-skilled employees.

Participant Eligibility

IWT provides further eligibility requirements for workers. For an individual to qualify for [Incumbent Worker Training](#) (IWT), they must:

1. Be currently employed and in need of additional training to avert a layoff or be retained with the employer;
2. Have an established employment history with the employer for six (6) months or more;
3. Earn less than \$25.00/hr.; and
4. Have enrolled with PA CareerLink® Pittsburgh/Allegheny County WIOA Adult or Dislocated Worker programs.

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 6 months or more as long as a majority of those employees being trained do meet the employment history requirement.

IWT Requirements

1. When funds are available, WIOA IWT contracts may be written for eligible individuals when:
 - a. The employee is not earning more than \$25/hr. Priority in funding will be given to those individuals not earning a [self-sufficient wage](#) as determined by Partner4Work.
 - b. The IWT is necessary to meet the requirements of an employer or group of employers to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment.

WIOA Incumbent Worker Training Funding Levels

Employers participating in IWT are required to pay the non-federal share (hereafter referred to “employer share”) of the cost of providing training to their [incumbent workers](#), per the sliding scale outlined below. A maximum of \$5,000 per trained worker is permitted under this policy. Partner4Work will consider exceptions to the cap on training funds. Providers must follow the process for policy exceptions found [HERE](#).

The employer share may be provided in cash or in kind and may include the wages paid by the employer to a worker while the worker is attending the [incumbent worker training](#) program. Partner4Work WIOA incumbent worker funds may not be used to pay for the wages of workers being trained. Funds provided under this program may be used for the cost of providing the training, including the cost of developing the training or fees for the training program or training provider.

The level of Partner4Work reimbursement to the employer is determined by the employer size:

1. 50 or fewer employees = 90% of the cost of training for the employer, up to \$5,000 per Incumbent

- Worker participant
2. 51-100 employees = 75% of the cost of training for the employer, up to \$5,000 per Incumbent Worker participant
 3. 101 and more employees= 50% of the cost of training for the employer, up to \$5,000 per Incumbent Worker participant

Employer size is determined by the number of employees at the time of the execution of the Incumbent Worker Training contract.

FOLLOW-UP SERVICES

Adult and Dislocated Worker staff must make follow-up services, including counseling regarding the workplace, available to participants, who are placed in unsubsidized employment, for a minimum of 12 months following the first day of employment or the WIOA program exit date for participants who have not placed in unsubsidized employment.

Partner4Work requires that follow-up services for Adult and Dislocated Worker participants include at a minimum quarterly contact until a full 12-month period has passed since the date of placement in unsubsidized employment or the WIOA program exit date for participants who have not placed in unsubsidized employment. Provider staff should determine if more frequent follow-up services are needed based on the participant's individual needs and career goals, as documented in their [individual employment plan](#) (IEP). Staff must document each follow-up service in the Commonwealth Workforce Development System (CWDS) through both service code entry and case notes.

Exceptions

Exceptions to the follow-up services requirement are permitted if at least one of the following criteria is met:

- Staff have made reasonable attempts to contact a participant at a minimum monthly over a three-month period and the participant has not responded. Each attempt to contact must be documented in CWDS case notes. Attempts must have been made to all phone numbers associated with a participant and through at least one other medium (e.g. email, text messaging, written letter).
- A participant has notified WIOA Adult and Dislocated Worker staff that they no longer need or want follow-up services or contact. This must be documented in CWDS case notes and any written notification from the participant must be kept in their case file.

WIOA funding may not be used to pay for [supportive services](#) for a WIOA Adult or Dislocated Worker participant during the follow-up period.

PROGRAM/PROVIDER PERFORMANCE

DATA ENTRY & SYSTEM OF RECORD

Once a participant has been verified eligible, they must be entered into the official system of record for WIOA programs in Pennsylvania. The system of record for participant-level workforce development data in PA is the Commonwealth Workforce Development System (CWDS). Providers must recognize that CWDS is the [system of record](#) for WIOA services in the Commonwealth and agree that all WIOA program data will be entered therein. Staff must be fully competent in utilizing CWDS and providing basic guidance regarding CWDS to other service providers within the P4W network, including querying and producing reports from CWDS regarding the PA CareerLink® system. P4W will utilize data from CWDS, as well as data

collected from other sources, to determine program compliance and evaluate performance of providers.

Providers will adhere to the PA CareerLink® Systems Manual for guidance on proper documentation for WIOA Title I-B Services and other PA CareerLink® participation. In addition, providers will maintain internal protocols for uniformed and detailed case notes to ensure clear and consistent tracking and documentation of progress throughout the program. Providers will participate in quality and compliance activities, as well as regular meetings and review of performance reports, and other written reports when requested.

Providers will identify staff members whose work requires access to CWDS and submit applications for CWDS access per local protocols, subject to approval by P4W. Appropriate staff members to receive CWDS access include case managers, employment specialists, job developers, and other staff members who have regular contact with participants or whose work requires monitoring and oversight of participant data maintained in CWDS. CWDS account credentials and login information may not be shared between staff members or other individuals. Providers must submit notification if any staff member with CWDS access is terminated, voluntarily or involuntarily, within 24 hours of termination. Failure to do so may result in revocation of CWDS access for program providers and contract termination.

CASE MANAGEMENT

Case management is a process of building relationships with participants, understanding clients to the extent that managers can help guide participants and recommend services and training pathways that meet their needs. WIOA programs require that case management within a provider organization also includes extensive data collection and management within guidelines set within WIOA and defined by Partner4Work staff. All entries into CWDS should be completed as soon as possible; any data entry backdated more than 30 days is considered late.

DOCUMENTATION REQUESTS

A provider's inability to deliver documentation requested by Partner4Work could result in compliance findings if the documentation is not submitted in a timely manner.

PERFORMANCE INDICATORS & GOALS

Title I Program providers must meet or exceed the goals described below, consisting of two parts - WIOA Primary Indicators of Performance and Additional Performance Indicators and Goals. The effectiveness of WIOA programs is measured across the WIOA Primary Indicators of Performance codified by federal law. Provider performance across these indicators will be evaluated according to definitions, calculations and guidance from the U.S. Department of Labor, including but not limited to TEG 10-16 and TAC (Technical Assistance Circular) 17-01, as well as related WIOA guidance and directives from the Pennsylvania Department of Labor & Industry. As a Workforce Development Board, Partner4Work is required to negotiate goals for each of these indicators periodically with the PA Department of Labor & Industry. The indicators and negotiated goals apply to the WIOA programs that Partner4Work administers across the workforce development system in Allegheny County and the City of Pittsburgh.

Beyond measures required by WIOA, Partner4Work has incorporated additional measures to provide evidence of progress towards organizational goals around integration of services. Partner4Work reserves the right to add or modify performance measures in each year's contract negotiation.

WIOA PRIMARY INDICATORS OF PERFORMANCE GOALS FOR PERIOD OF 7/1/2025 - 6/30/2026	ADULT	DISLOCATED WORKER
A. Employment 2nd Quarter after Exit: Percentage of participants who are in unsubsidized employment during the second quarter after exit from the program	77%	80%

B. Employment 4th Quarter after Exit: Percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program	75%	78%
C. Median Earnings - 2nd Quarter After Exit: The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.	\$6,000	\$9,000
D. Credential Attainment: The percentage of participants in an education or training program who attain a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent.	75%	75%
E. Measurable Skill Gains: The percentage of participants in an education or training program who achieve measurable skill gains - documented academic, technical, occupational, or other forms of progress.	75%	75%

In addition to the WIOA Primary Indicators of Performance, Program providers must meet or exceed the following annual performance goals.

ADDITIONAL PERFORMANCE INDICATORS AND GOALS GOALS FOR PERIOD OF 7/1/2025 - 6/30/2026	ADULT & DISLOCATED WORKER
1. Completed WIOA Applications. Number of A/DW program applications completed during contract period	See Contract
2. Activated Participants. Number of WIOA Adult/DW participants whose case status changed from 'Eligible' to 'Participating' in CWDS during the current program year, due to provision of a triggering services by SUBRECIPIENT	See Contract
3. Job Placements. All instances of verifiable employment for participants of A/DW Services during the contract period. Multiple placements for one individual or case may be included.	See Contract
4. Employment Rate at Exit. Percentage of participants exited from A/DW Services to an unsubsidized employment outcome during the contract period.	See Contract
5. Self-Sufficiency Rate at Exit. Percentage of participants exited from A/DW Services to an unsubsidized employment outcome that meets or exceeds PARTNER4WORK's self-sufficiency wage (subject to change) during the contract period.	See Contract

PERSONALLY IDENTIFIABLE INFORMATION

As part of grant activities, staff may have access to program participant or staff PII. This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files, or other sources. Federal law and federal policies require that PII and other sensitive information be secured and protected at all times.

KEY TERMS

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

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

- 1) **“Protected PII”** is information that if disclosed could result in harm to the individual whose name or identity is linked to that information. Examples of protected PII include, but are not limited to, social security numbers (SSNs), credit card numbers, bank account numbers, home telephone numbers, ages, birthdates, marital status, spouse names, educational history, biometric identifiers (fingerprints, voiceprints, iris scans, etc.), medical history, financial information, and computer passwords.
- 2) **“Non-sensitive PII”** is information that if disclosed, by itself, could not reasonably be expected to result in personal harm. It is standalone information that is not linked or closely associated with any protected or unprotected PII. Examples of non-sensitive PII include information such as first and last names, e-mail addresses, business addresses, business telephone numbers, general education credentials, gender, or race. However, depending on the circumstances, a combination of these items could potentially be categorized as protected or sensitive PII.

To illustrate the connection between non-sensitive PII and protected PII, the disclosure of a name, business e-mail address, or business address most likely will not result in a high degree of harm to an individual. However, a name linked to a social security number, a date of birth, and mother’s maiden name could result in identity theft. This demonstrates why protecting the information of our program participants is so important.

REQUIREMENTS

All parties must ensure the privacy of all PII obtained from [participants](#) and to protect such information from unauthorized disclosure. All parties must ensure that PII used during their grant has been obtained in conformity with applicable Federal and state laws and policies governing the confidentiality of information.

All PII transmitted via e-mail or stored on external drives, internal hard drives, or cloud drives must be encrypted. All PII stored onsite and electronically must have limited access, be always kept safe from unauthorized individuals, and must be managed with appropriate information technology (IT) services. Accessing, processing, and storing of PII data on personally owned equipment at off-site locations (e.g. employee’s home, and non-grantee managed IT services, e.g. Yahoo mail, Gmail, etc.) is strictly prohibited.

All parties who will have access to [sensitive](#)/confidential/proprietary/private data must be advised of the confidential nature of the information, the safeguards with which they must comply to protect the information, and that they may be liable to civil and criminal sanctions for improper disclosure.

Access to any PII obtained through the grant must be restricted to only those employees of the grant recipient who need it in their official capacity to perform duties in connection with the scope of work in the grant agreement.

All PII data must be processed in a manner that will protect the confidentiality of the records/documents and is designed to prevent unauthorized persons from retrieving such records by computer, remote terminal, or any other means. When communicating with Partner4Work staff, subrecipients should never send sensitive information over their normal email platform. All emails sent to Partner4Work staff containing PII must be through DeliverySlip, Partner4Work’s secure email platform. The subrecipient should inform Partner4Work of all staff requiring DeliverySlip access.

Grantees must permit the Employment and Training Administration (ETA) and Partner4Work to make onsite inspections during regular business hours for the purpose of conducting audits and/or conducting

other investigations to assure that the grantee is complying with the confidentiality requirements described above. In accordance with this responsibility, grantees must make records applicable to this agreement available to authorized persons for the purpose of inspection, review and/or audit.

Grantees must retain data received from ETA or Partner4Work only for the period of time required to use it for assessment and other purposes, or to satisfy applicable Federal and Partner4Work records retention requirements, if any. Thereafter, the grantee agrees that all data will be destroyed, including deletion of electronic data.

Additional Requirements:

1. Before collecting PII or [sensitive information](#) from [participants](#), have participants sign releases acknowledging the use of PII for grant purposes only.
2. Whenever possible, use unique identifiers for participant tracking instead of SSNs. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to each individual record. Once the SSN is entered for performance tracking, the unique identifier would be used in place of the SSN for tracking purposes. If SSNs are to be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.
3. Use appropriate methods for destroying sensitive PII in paper files (i.e. shredding) and securely deleting sensitive electronic PII.
4. Do not leave records containing PII open and unattended.
5. Store documents containing PII in locked cabinets when not in use.
6. Immediately report any breach or suspected breach of PII.

COMPLAINT & GRIEVANCE POLICY

The purpose of this section is to inform Partner4Work- funded program participants, staff, and partners of the procedures for filing a complaint or grievance alleging violations of programs and/or related policies and regulations.

BACKGROUND

Federal law mandates the development of procedures for filing complaints and grievances submitted by participants affected by, and who allege, violations of the requirements of program regulations or policies. The Partner4Work Complaint and Grievance Policy applies to program complaints and complaints regarding training and career services/activities only. For example, participants may file specific complaints pertaining to particular service provider staff and/or program services, refusal of entry into program activities, and denial of support service funds.

Partner4Work is the appropriate organization of contact when the complaint specifically concerns Partner4Work-funded programs. Each funded service provider must adhere to this policy. Service providers must retain documentation on any customer complaints that are received and resolved at the service providers' level, including the contents of the complaint and the resolution. This documentation must be made available to Partner4Work compliance monitors upon request.

POLICY

Partner4Work is the appropriate organization of contact when the complaint specifically concerns WIOA Title I Adult, Dislocated Worker, and Youth programs or complaints regarding the WIOA one-stop operator. Each WIOA Title I Adult, Dislocated Worker, and Youth funded service provider, as well as the one-stop operator, must adhere to this policy. Service providers and the one-stop operator must retain documentation on any customer

complaints that are received and resolved at the service providers' level, including the contents of the complaint and the resolution. This documentation must be made available to Partner4Work compliance monitors upon request.

This formal complaint process is specifically intended for violations of WIOA requirements or significant service delivery concerns for which a resolution is required or requested. For general customer feedback, providers must have other mechanisms in place to collect and respond to this information (e.g., customer feedback survey). Generally, individuals may submit complaints for any of the following reasons:

- **Denial of Services:** Being improperly denied access to WIOA-funded programs, training, or benefits.
- **Program Eligibility Disputes:** Issues related to eligibility determinations for WIOA services.
- **Service Delivery Concerns:** Allegations of mismanagement, inadequate services, or failure to follow program procedures.
- **Other Violations of WIOA Law or Regulations** – Any action that conflicts with WIOA statutory or regulatory requirements.

When possible, participants, staff, and/or other parties are encouraged to resolve an issue informally at the service provider level prior to filing a formal complaint with Partner4Work. Individuals or organizations interested in filing a complaint with Partner4Work must follow the procedures below.

Step 1: Opportunity to File a Complaint

Individuals or entities seeking to file a written complaint to Partner4Work must complete the **Partner4Work Complaint and Grievance Form**, which is attached to this policy and available at partner4work.org. This form must be mailed or emailed to the following:

Partner4Work Compliance Manager

650 Smithfield St

Centre City Tower, Suite 2400

Pittsburgh, PA 15222

grievances@partner4work.org

All complaints or grievances must be filed within **180 calendar days** of the alleged violation to be reviewed and considered by Partner4Work.

Step 2: Opportunity for an Informal Resolution

The Partner4Work Compliance Manager will notify the complainant, acknowledging receipt of the complaint, within 5 calendar days of receiving the complaint.

The Partner4Work Compliance Manager will schedule a meeting with the complainant to occur within **15 calendar days** of receiving the complaint to attempt to reach an informal resolution between the parties. If an informal resolution can be reached, Partner4Work will request a written confirmation from the complainant verifying that they agree to the terms of the resolution. Partner4Work will notify all parties involved in writing that an informal resolution has been reached.

Step 3: Opportunity for a Hearing

If Partner4Work is unable to reach an informal resolution with the complainant, the complainant will be provided the opportunity for a hearing to take place no later than **30 calendar days** after the initial filing date of the complaint.

To ensure bias does not influence the outcome of a hearing, Partner4Work will perform an assessment

of qualified staff. Upon conclusion, Partner4Work will appoint an impartial and qualified individual as the Hearing Officer to act as a mediator and attempt to resolve the issue(s) and render an independent decision. The Hearing Officer will send out a written notification of the hearing to all parties concerned, stating the date, time and place of the hearing and the issues to be heard.

All parties have the right to be accompanied by an attorney (at their own expense), or other duly authorized representative. All parties have the right to present testimony and to bring witnesses and records.

A written decision will be issued by the Hearing Officer to the complainant and all parties who attended the hearing within **60 calendar days** of the filing of the complaint. The decision will include: 1) a synopsis of the facts, 2) a statement of reasons for the decision, and 3) notification of records. All correspondence will be mailed certified with a return receipt requested.

Step 4: Commonwealth Grievance and Hearing Procedures

If Partner4Work does not provide a written decision within **60 calendar days** of receiving the complaint or either party involved receives a decision determined to be unsatisfactory, either party involved has the right to submit a local level appeal to the Commonwealth of Pennsylvania regarding the complaint in compliance with the Commonwealth of Pennsylvania's established procedures.

Information Requirements

Program providers must make commercially reasonable efforts to ensure participants, staff, partners, and other parties affected by the local workforce development system are informed of the content and requirements of this policy. This includes providing information on this policy during program enrollment and displaying the information in this policy in a public space.

Labor Standards Violations

If a collective bargaining agreement covering the parties to the grievance so provides, an individual alleging a labor standards violation may resolve the grievance through binding arbitration.

Important Disclaimers:

- This policy does not address the procedures for processing complaints alleging discrimination under WIOA Section 188 Nondiscrimination and Equal Opportunity Regulations, (29 CFR Part 38).
- This policy does not address the procedures for processing complaints for WIOA mandated partner programs outside of WIOA Title I Adult, Dislocated Worker, and Youth programs and the WIOA one-stop operator. Such complaints should be made via the internal processes of those partner organizations/agencies.
- Nothing in this policy precludes a complainant from pursuing a remedy authorized under another federal, state, or local law.

POLICY EXCEPTIONS

Under limited circumstances, Partner4Work may grant exceptions to requirements within this policy. Requests for exceptions may be submitted using the [Policy Exception Request Form](#) available at www.partner4work.org.

Exception requests will be reviewed based on their allowability under any applicable legislation, regulation, and policy. Partner4Work will also consider funding availability, how an exception will lead to improved outcomes for the customer(s) being served, and other relevant factors.

GLOSSARY OF TERMS

Hyperlinked words throughout this manual will bring the reader to the definition below, when engaged. To navigate back to the original section, simply engage **Alt+ Left Arrow**.

BARRIER TO EMPLOYMENT: The term individual with a “barrier to employment” means a member of one or more of the following populations:

- a) Displaced homemakers
- b) Low-income individuals
- c) Indians, Alaska Natives, and Native Hawaiians
- d) Individuals with disabilities, including youth who are individuals with disabilities
- e) Older individuals, i.e. those aged 55 or older
- f) Ex-offenders
- g) Homeless individuals
- h) Youth who are in or have aged out of the foster care system
- i) Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers
- j) Eligible migrant and seasonal farmworkers
- k) Single parents (including single pregnant women)
- l) Long-term unemployed individuals
- m) Recipients of public assistance

BASIC SKILLS DEFICIENT: “Basic Skills Deficient” individuals are:

- A youth with English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- A youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

CHRONIC UNEMPLOYMENT: Individuals with “chronic unemployment” or an “inconsistent work history” are those who:

- 1) Have been unemployed for 13 weeks or longer;
- 2) Were unemployed at least 26 of the past 52 weeks; or
- 3) Have held three or more jobs in the past 52 weeks and are currently unemployed or underemployed.

COVERED PERSON: “Covered Person” – as defined in section 2(a) of the Jobs for Veterans Act (JVA) of 2008 means a veteran or eligible spouse. A veteran is defined as a person who served at least one day in the active military, naval, or air service and who was discharged under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).

CUSTOMIZED JOB TRAINING: The term “Customized Job Training” means training by an employer or employers or by a training provider in conjunction with an employer that is provided to five or more paid participants concurrently while engaged in productive work in a job that:

- a) Provides knowledge or skills essential to the full and adequate performance of the occupation.
- b) Provides reimbursement to the employer(s) for the costs of providing the training and additional supervision related to the training.
- c) Is limited in duration as appropriate to the occupation for which the participants are being trained.

ELIGIBLE SPOUSE: “Eligible Spouse” - as defined in section 2(a) of the JVA means the spouse of any of the following individuals:

- 1) Any veteran who died of a service-connected disability;

- 2) Any member of the Armed Forces serving on active duty who, at the time of application for service under this section, is listed in one or more of the following categories and has been so listed for a total of more than 90 days: (I) missing in action; (II) captured in the line of duty by a hostile force or (III) forcibly detained or interned in line of duty by a foreign government or power;
- 3) Any veteran who has a total disability resulting from a service-connected disability as evaluated by the Department of Veterans Affairs;
- 4) Any veteran who died while having a disability, as indicated in bullet (3) of this definition was in existence.¹ A spouse whose eligibility is derived from a living veteran or service member (i.e., category 2 or 3 above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

ELIGIBLE TRAINING PROVIDER: “Eligible Training Provider” is a provider of training services who has met the eligibility requirements to receive WIOA title I-B Adult, Dislocated Worker, and Youth funds to provide training services to eligible individuals.

ELIGIBLE TRAINING PROVIDER LIST: The term “Eligible Training Provider List” means the commonwealth’s statewide list of approved providers of training services who are eligible to receive WIOA title I-B funds.

FAMILY: “Family” means two or more persons 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:

- A married couple and dependent children;
- A parent or guardian and dependent children; or
- A married couple.

HOMELESS INDIVIDUAL: “Homeless Individual” means an individual who meets any of the following criteria:

- Lacks a fixed regular, and adequate nighttime residence; this includes a participant who:
 - Is sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
 - Is living in a motel, hotel, trailer park, or campground due to a lack of alternative adequate accommodations;
 - Is living in an emergency or transitional shelter;
 - Is abandoned in a hospital; or
- Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, such as a car, park, abandoned building, bus or train station, airport, or camping ground;

(Note- A participant imprisoned or detained under an Act of Congress or State law does not meet the definition. Additionally, a participant who may be sleeping in a temporary accommodation while away from home should not, as a result of that alone, be recorded as homeless.)

HOST SITES: “Host sites” are defined as a for-profit or non-profit organization, government organization, or educational institution which provides a TJ placement. Host sites must provide day-to-day supervision of the TJ participant while on site.

INCENTIVES: Incentive payments are awarded to participants in recognition of a measurable achievement directly tied to training activities or work experiences. Incentive payments differ from stipends, as they must be awarded in response to a specific outcome achieved (e.g. credential attainment, job placement,

placement in post-secondary education) rather than program participation/attendance.

INCUMBENT WORKER: An “Incumbent Worker” is defined as an individual who has an established employment history with the employer for 6 months or more.

INCUMBENT WORKER TRAINING: The term “Incumbent Worker Training” means training by an employer or training provider in close partnership with an employer that is provided to a paid participant while engaged in productive work in a job that:

- a. Provides knowledge or skills essential to the full and adequate performance of the occupation.
- b. Provides reimbursement to the employer for the costs of providing the training and additional supervision related to the training.
- c. Is limited in duration as appropriate to the occupation for which the participant is being trained.

Incumbent Worker Training is intended to meet the requirements of an employer or group of employers to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment.

INDIVIDUAL EMPLOYMENT PLAN: “Individual employment plan” (IEP) refers to an ongoing strategy jointly developed by the participant and the case manager that identifies the participant’s employment goals, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve the employment goals.

INDIVIDUAL TRAINING ACCOUNT: An “individual training account” (ITA) is a funding mechanism through which eligible individuals can access quality training to help obtain employment in high demand occupations.

LOW INCOME INDIVIDUAL: The term “low-income individual” means an individual who meets one or more of the characteristics listed below:

- Recipient of Cash Public Assistance
- Family Income that does not exceed the higher of 70% of the Lower Living Standard Income Level (LLSIL) or the poverty line
- Receives Food Stamps or was determined eligible to receive in the last six months
- Homeless
- Publicly supported Foster Child
- Individual with a disability and own income at or below 70% of the LLSIL or the poverty line
- Receives, or is eligible to receive a free or reduced-price school lunch*
- An individual who resides in a high poverty area, defined as an area that has a poverty rate of at least 30% (set every 5 years, using ACS 5-year estimates)

* Programs must base low-income status on an individual student’s eligibility to receive free or reduced-price lunch, whole school receipt of free or reduced-price lunch cannot be used to determine WIOA low-income status for In-School Youth (ISY). In schools where the whole school automatically receives free or reduced-price lunch, programs can check with their local school districts for determining whether individual students are eligible.

NEEDS RELATED PAYMENTS: “Needs related payments” provide financial assistance to enable individuals to participate in training activities.

ON-THE-JOB TRAINING: “On-the-Job Training” (OJT) means training by an employer that is provided to a paid participant while engaged in productive work in a job that:

- Provides knowledge or skills essential to the full and adequate performance of the occupation;

- Provides reimbursement to the employer for the costs of providing the training and additional supervision related to the training; and
- Is limited in duration as appropriate to the occupation for which the participant is being trained.

PARTICIPANT: For local adult, dislocated worker programs and Wagner-Peyser, a “participant” is a reportable individual who has received services other than self-service only or information-only services or activities after satisfying all applicable programmatic requirements for the provision of services.

PRIORITY OF SERVICE: The term “Priority of Service” means, with respect to any qualified job training program, that a covered person shall be given priority over non-covered person for the receipt of employment, training and placement services provided under that program, notwithstanding any other provisions of the law.

PROGRAM OF TRAINING SERVICES: “Program of Training Services” is defined as one (1) or more courses or classes, or a structured regimen that leads to a recognized post-secondary credential, secondary school diploma or its equivalent; employment; or measurable skill gains toward such a credential or employment.

SELF-ATTESTATION: “Self-attestation” occurs when an individual states his or her status for a particular data element, such as “runaway youth”, and then signs and dates a form acknowledging this status. Self-attestation is the process of: a) the individual identifying their status for permitted elements; and b) the individual signing and dating a form attesting to this self-identification.

SELF-CERTIFICATION: “Self-certification” is the individual’s signed attestation that the information said individual submitted to demonstrate eligibility for a program under title I of WIOA is true and accurate. A signed **Self-Certification Form** is a type of self-certification.

SELF-SUFFICIENCY: The term “self-sufficiency” refers to the level of income a person or family must be below to be eligible for certain WIOA services. To qualify for a WIOA-funded training service, it must be determined that a client is unlikely or unable to obtain or retain employment at the self-sufficiency wage or wages comparable to or higher than wages from previous employment through career services alone.

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

STIPENDS: Stipends are predetermined, fixed payments that may be awarded to individuals for participation or attendance in training or work experience activities. Stipends differ from incentive payments as they are not tied to specific program outcomes (e.g. credential attainment) and instead are based on levels of program participation or attendance met. Stipends are not considered income for WIOA eligibility purposes, are not required to meet minimum wage requirements, are not dispersed as payroll, and income tax is not withheld.

Stipends are not a substitute for wages. Providers should refer to applicable legislation/policies, including the Fair Labor Standards Act (FLSA), to determine when a wage must be paid to individuals.

Resources: The USDOL - Wage and Hour Division: [Fact Sheet #71: Internship Programs Under The Fair Labor Standards Act](#) can assist in determining whether an intern vs. employee relationship exists and if a wage must be paid. The USDOL has also provided this [FLSA compliance resource](#) to assist in determining whether a student/trainee vs. employee relationship exists.

SUPPORTIVE SERVICES: The term “Supportive Services” means services such as transportation, clothing and/or uniforms, equipment/tools, drug testing and/or TB testing, and reasonable accommodations for individuals with disabilities, that are necessary to enable an individual to participate in activities authorized under WIOA.

TRANSITIONAL JOB: The term “Transitional Job” (TJ) means paid work experience that:

- a. Is time limited and subsidized;
- b. Is in the public, private, or nonprofit sector;
- c. Is provided to individuals with barriers to employment who are [chronically unemployed](#) or have an inconsistent work history;
- d. Is combined with comprehensive employment and [supportive services](#); and
- e. Is designed to help participants establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment.

UNDEREMPLOYED: P4W defines the term “underemployed” as meeting one or more of the following criteria:

- An individual who is employed less than full-time who is seeking full-time employment, including individuals who may be employed at full-time across multiple positions, but are seeking full-time employment at a single position;
- An individual who is employed in a position that is inadequate with respect to their skills and training;
- An individual who is employed, but earning a wage that is below the [self-sufficiency](#) wage as defined by Partner4Work’s Self-Sufficiency Policy; or
- An individual who is employed, but whose earnings are not sufficient compared to their previous position’s earnings from their previous employment.

WAGES: A wage is generally a payment for services rendered where an employer/employee relationship exists. This form of compensation is usually paid through a payroll system and is subject to the taxes applicable to the employer of record and participants. Paying a wage usually indicates that a program views the youth as an employee.

REFERENCES

Eligibility

- Jobs for Veterans Act (JVA) of 2008
- Training and Employment Guidance Letter (TEGL) 19-16
- TEGL 07-20
- [US Selective Service System FAQs](#)
- WIOA Section 134(b)(3)(E)
- WIOA Section 3(2), (5), (15), (16), (36)
- WORKFORCE SYSTEM GUIDANCE No. 04-2015 (Change 1), September 11, 2017
- Workforce System Policy (WSP) – Priority of Service (April 28, 2022)

WIOA Adult & Dislocated Worker Services

- TEGL 19-16

Supportive Services

- Dislocated Worker Near Completer Demonstration Project – Notice of Grant Availability (March 19, 2021)
- WIOA Section 3(59)
- 20 CFR §680.900

Self-Sufficiency

- Department of Health and Human Services - Federal Poverty Guidelines - 87 Federal Register

- TEGL 12-15
- WIOA Section 134(d)(1)(A)(x)

Transitional Jobs

- Partner4Work Eligibility Policy
- Partner4Work Supportive Services Policy
- WIOA Section 134(c) (3)(H)
- WIOA Section 134(d) (1-5)
- 20 CFR 680.150
- 20 CFR 680.530
- 20 CFR 680.830
- 20 CFR 680.840
- 20 CFR 680.850
- 20 CFR 680.900

Training Services

- Partner4Work Eligible Training Provider List Policy and Procedures
- Partner4Work Eligibility Policy
- Partner4Work Self-Sufficiency Policy
- [TEGL 19-16](#)
- WIOA Section (3)(44)
- WIOA Section 134(c) (3)(H)
- 20 CFR 680.530
- 20 CFR 680.700
- 20 CFR 680.710
- 20 CFR 680.730
- 20 CFR 680.740
- 20 CFR 680.760
- 20 CFR 680.780-820

Follow Up Services

- TEGL 19-16 (March 1, 2017)
- TEGL 21-16 (March 2, 2017)
- WIOA 20 CFR § 678.430
- WIOA 20 CFR § 681.580
- WIOA Sec 129(c)(2)(I)
- WIOA Sec 134(c)(2)(A)(xiii)

Personally-Identifiable Information

- TEGL 39-11

Complaint & Grievance Policy

- WIOA Final Rule 20 CFR § 683.600
- WIOA Section 181(c)

POLICY UPDATES

Supportive Services

Date	Update
12/15/2023	<ul style="list-style-type: none"> Revised language to clarify when a supportive service can be determined to be “necessary to enable participation in WIOA career services or training”. Revised language to clarify how providers may determine that a supportive service is unavailable through resources outside of WIOA funding. Removed references to the Near Completers Demonstration Grant. Updated Policy Exceptions section to direct reviewers to the P4W Policy Exception Form.
7/1/2024	<ul style="list-style-type: none"> Revised policy to restructure supportive service gas card distribution determined by mileage traveled to and from work or training at the established federal rate. Raised the weekly allowance of gas cards to \$75 from the \$60 cap for qualifying participants. Added childcare category to list of supportive services to align with DOL Green Infrastructure. Added section to establish disallowed supportive service categories. Added section to establish service codes for undefined supportive service categories.

Self-Sufficiency

Date	Update
12/15/2023	<ul style="list-style-type: none"> Updated Self-Sufficiency Policy to reflect 2024 Federal Poverty Guidelines.
07/01/2025	<ul style="list-style-type: none"> Updated Self-Sufficiency Policy to reflect 2025 Federal Poverty Guidelines.

Individual Training Accounts

Date	Update
12/15/2023	<ul style="list-style-type: none"> Revised policy to limit funding for Commercial Drivers’ License (CDL) training programs to \$3,750 per ITA, a decrease from the current cap of \$5,000 per ITA. Established a maximum amount of ITAs that may be issued per training program during a 12- month period. The following policy language has been added to P4W’s ITA Policy: <i>“A maximum of 30 individual training accounts may be issued per training program on the Eligible Training Provider List (ETPL) during a 12-month program year (July - June). Actual ITA funding amounts will be determined through the ITA agreement established with the training provider.”</i>
1/22/2024	<ul style="list-style-type: none"> Edited eligibility language to reflect the policy now having multiple ITA caps.

Eligibility

Date	Update
02/25/2025	<ul style="list-style-type: none"> Updated Eligibility Policy to reflect Federal and State Guidelines on the use of self-certification/self-attestation. Added subsection on secondary eligibility review requirements to align with PA Department of Labor & Industry Guidance Regarding Supervisory/ Second Level Review of Eligibility Determinations.

Incumbent Worker Training

Date	Update
07/01/2025	<ul style="list-style-type: none"> Revised the participant eligibility criteria to increase the maximum earnings for eligibility from \$20.00/hour to \$25.00/hour.

Performance Indicators and Goals

Date	Update
07/01/2025	<ul style="list-style-type: none"> Revised the subsection to align with PY2025 determinations.

Priority of Service

Date	Update
12/12/2025	<ul style="list-style-type: none"> Updated the reference section to remove the now cancelled Training and Employment Guidance Letter (TEGL) 03-15 and include TEGL 07-20.

Policy Exceptions

Date	Update
03/25/2026	<ul style="list-style-type: none"> The link in this policy has been updated to direct users to the new request form.

WIOA TELEPHONE VERIFICATION/DOCUMENT INSPECTION FORM

IDENTIFYING INFORMATION			
Applicant's Name _____	Last	First	MI
Participant ID _____	Date: _____		

WIOA ELIGIBILITY VERIFICATION BY TELEPHONE

NAME AND/OR NUMBER OF DOCUMENT _____

ELIGIBILITY ITEM(S) TO BE VERIFIED: _____
INFORMATION VERIFIED: _____
AGENCY PROVIDING VERIFICATION: _____
AGENT VERIFYING ELIGIBILITY ITEM: _____
DATE AND TIME OF VERIFICATION: _____
TELEPHONE NUMBER OF AGENCY PROVIDING VERIFICATION: _____

WIOA ELIGIBILITY VERIFICATION BY DOCUMENT INSPECTION

NAME AND/OR NUMBER OF DOCUMENT _____

ELIGIBILITY ITEM TO BE VERIFIED: _____
INFORMATION VERIFIED: _____
DOCUMENT TO BE INSPECTED: _____
ORIGINAL SOURCE OF DOCUMENT: _____
REASON FOR DOCUMENT INSPECTION: <input type="checkbox"/> REMOTE SITE ELIGIBILITY, NO COPIER AVAILABLE.
<input type="checkbox"/> ON SITE ELIGIBILITY, NO COPIER AVAILABLE.
<input type="checkbox"/> DOCUMENT CANNOT BE COPIED

<p>I ATTEST THAT THE INFORMATION RECORDED BY ME ON THIS DOCUMENT WAS OBTAINED THROUGH TELEPHONE CONTACT OR DOCUMENT INSPECTION ON THE ABOVE DATE. AS INDICATED BY THE AGENT, ALL INFORMATION WAS OBTAINED FROM DATA PREVIOUSLY DETERMINED AND RECORDED IN THE APPLICANT'S RECORDS AT THE AGENCY PROVIDING THE ELIGIBILITY VERIFICATION.</p> <p style="text-align: center;">OR</p> <p>I ATTEST THAT THE DOCUMENT INSPECTION VERIFIED THE PRIMARY/SECONDARY ITEMS REQUIRED TO DETERMINE ELIGIBILITY FOR THE WIOA PROGRAM.</p>				
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**WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)
STATEMENT OF FAMILY SIZE/FAMILY INCOME**

IDENTIFYING INFORMATION			
Applicant's Name: _____			
Last	First	MI	
Address: _____			

Participant ID: _____		Application Date: _____	

To be completed by WIOA Applicant with staff assistance

For use in completing this form, the definitions of FAMILY and FAMILY INCOME can be found in this attachment.

Please provide information regarding the applicant's FAMILY as requested below.

FAMILY MEMBER'S NAME	RELATIONSHIP TO APPLICANT	FAMILY MEMBER INCOME (Last Six Months)

Total Number in Family: _____	Total Income: 0
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If applicable, please complete the following information for FAMILY MEMBERS not currently residing in the applicant's residence (see instructions).

NAME	LOCATION	REASON

I attest to the best of my knowledge that the information above is true and correct.

Signature of Applicant _____ Date

CORROBORATING WITNESS – I attest to the best of my knowledge that the information is true and correct.

Name _____ Signature _____ Date _____

Address _____ City _____ State _____ Zip _____

Telephone Number _____ Relationship to Applicant _____

PARTNER WORK

Complaint and Grievance Form

Full Name: _____ Date of Filing (MM/DD/YYYY): _____

Phone Number: _____ Email: _____

Provider Name: _____ Case Manager (if applicable): _____

Name of the person and/or organization you are filing a complaint/grievance against (if applicable):

Date of Incident, if available (MM/DD/YYYY): _____

The reason for my complaint or grievance is:

I have discussed this complaint or grievance with the following provider staff (please include name of staff person and date discussed):

I received the following response from provider staff:

PARTNER WORK

My complaint or grievance has not been resolved due to the following:

I believe the best course action to resolve my complaint or grievance would be the following:

SIGNATURE

Print Name: _____

Signature: _____

Date: _____

This form must be submitted by mail or email to the following:

Partner4Work Compliance Manager
650 Smithfield St
Centre City Tower, Suite 2400
Pittsburgh, PA 15222
grievances@partner4work.org