

WIOA TITLE I YOUTH POLICY MANUAL



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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) Pittsburgh/Allegheny County. 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 services 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.

WIOA YOUTH

The allocation of funding toward youth career and training services is an integral part of the Workforce Innovation and Opportunity Act of 2014. Title I of this act provides for the commitment of youth engagement, supplying guiding principles for complex service provision for young people aged 14-24 who face systemic barriers to education, training, and employment.

The WIOA Youth Program focuses on assisting out-of-school youth and in-school youth with one or more identified barriers as they prepare for employment and postsecondary education opportunities, attain educational and/or skills training credentials, and secure employment with career/promotional opportunities. These services are made possible through federal funding allocated toward the states, and subsequently passed through Local Areas/LWDBs to deliver comprehensive youth services through regional, competitively procured providers.

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 Youth 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 Youth participants and to individuals interested in enrolling in these programs.

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

WIOA YOUTH ELIGIBILITY

This section ensures every participant who receives WIOA Title I Youth program funded services is eligible and registered to receive those services.

Disclaimer: This manual contains language regarding eligibility criteria as it appears in the WIOA legislation. However, Partner4Work encourages providers to utilize person-centered language, where possible. For example, “individual with a criminal background” or “individual experiencing homelessness” may be used in place of “an offender” or “homeless individual”, respectively.

Both In-School Youth (ISY) and Out-of-School Youth (OSY) must meet the following eligibility requirements:

- 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)

ADDITIONAL ELIGIBILITY REQUIREMENTS FOR IN-SCHOOL YOUTH (ISY)

- An individual who is between 14 and 21 years of age;

- An individual who is [attending school](#), including secondary and post-secondary school (as defined by State law)
- A [low income individual](#); and
- One or more of the following:
 - [Basic skills deficient](#);
 - An English language learner;
 - An [offender](#);
 - A [homeless](#) individual;
 - Pregnant or parenting;
 - A youth who is an individual with a disability;
 - An [individual who requires additional assistance to complete an educational program or to secure or hold employment](#) (see Definition of Key Terms section). No more than five (5) percent of ISY served by Partner4Work in a program year may be deemed eligible based on this criterion.

ADDITIONAL ELIGIBILITY REQUIREMENTS FOR OUT-OF-SCHOOL YOUTH (OSY)

- An individual who is [not attending any school](#) (including secondary or postsecondary);
- An individual between the ages of 16 and 24 years of age; and
- One or more of the following:
 - A school dropout;
 - A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter;
 - A recipient of a secondary school diploma or its recognized equivalent who is a [low-income individual](#) and is—
 - [Basic skills deficient](#); or
 - An English language learner
 - An individual who is subject to the juvenile or adult justice system;
 - A [homeless individual](#), a runaway, an individual in foster care, or an individual who has aged out of the foster care system;
 - An individual who is pregnant or parenting;
 - A youth who is an individual with a disability;
 - A low-income [individual who requires additional assistance to enter or complete an educational program or to secure or hold employment](#)

An eligible ISY or OSY who has their high school diploma or GED and who is [basic skills deficient](#) or an English language learner must also meet the WIOA definition of [low-income](#). Up to five (5) percent of youth registered may be classified as not low income but meet the other eligibility requirements. Requests to enroll youth who are not low income must be approved by Partner4Work.

SELECTIVE SERVICE REQUIREMENTS

Every citizen and permanent resident non-citizen in the United States, who were assigned male at birth, and are between the ages of 18 and 26, are required to register with Selective Service. 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.

PRIMARY ELIGIBILITY REVIEW

WIOA Youth staff must verify participant eligibility prior to the provision of services. It is the WIOA Youth provider's responsibility to review and sign off on all registration paperwork for completeness and accuracy. The provider must maintain a centrally controlled file for each program applicant and registrant which contains copies of all documents collected, and 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), by verification through relevant websites, direct communication with representatives of authorized agencies, or other authorized methods.
- **Documentation** means to maintain physical evidence, which is obtained during the verification process, in participant files. Examples of such evidence are copies of documents to CWDS for data validation purposes or maintaining copies of documents in hard-copy files (where legally permitted).

The Commonwealth Workforce Development System (CWDS) is the sole system of record for WIOA participant data. All data and documentation for tracking participants' registration and eligibility must be entered into CWDS by Youth Program staff. **This checklist** may be used to determine which documents verify eligibility.

SECONDARY ELIGIBILITY REVIEW

To ensure accurate and compliant eligibility 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.

SELF-CERTIFICATION

WIOA Youth 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. 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 "Homeless Youth". The participant did not have any other documentation available to verify this eligibility criteria. 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 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.

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

- Individual with a Disability
- Veteran Status
- English Language Learner
- Homeless
- Runaway
- In/Aged Out of Foster Care System
- Offender
- Pregnant or Parenting
- Requires Additional Assistance
- School Status at Time of Registration

The only data element related to Title I Youth eligibility that does not permit the use of self- attestation as acceptable documentation is eligibility barrier: “basic skills deficient”. 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 3, *Guidance for Validating Required Performance Data Submitted by Grant Recipients of USDOL Workforce Programs*.

Random Sampling Methodology

To verify applicant self-certification usage, Partner4Work will adopt a random sampling methodology. The methodology will verify eligibility in self-attested applications and will be implemented for all Title I programs.

Based on previous experience, Partner4Work estimates that less than 1% of participants report incorrect information when self-attesting on application forms. For the purposes of ensuring the validity of self-attested data, Partner4Work will use a 90% confidence interval and 5% margin of error. A random sample of the population utilizing self-attestation 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. all OSY) and not by individual provider. Participants selected through the random sampling methodology will be notified at the time of monitoring 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.

Note: As a best practice, once enrolled, programs should assist the participant in obtaining required documents (i.e. birth certificate, photo identification) through the use of supportive service funds as these documents are likely needed for employment.

WIOA YOUTH SERVICES

WIOA Section 129(c)(2) describes 14 program elements that must be made available to youth participants. Providers must ensure youth participants have access to all 14 program elements either through direct service or referral partnerships. Program providers are not required to directly deliver all 14 elements; however, providers **must** directly deliver elements 3, 7, 8, 9, and 13, at a minimum. These elements are shaded below.

WIOA PROGRAM ELEMENT	DESCRIPTION
1. Tutoring, study skills training, and instruction leading to the completion of secondary school, including dropout prevention strategies;	These services focus on academic support, assisting with learning obstacles, and can be provided one-on-one, in a group setting, or through resources and workshops.
2. Alternative secondary school services or dropout recovery, as appropriate;	“Dropout recovery” refers to services attempting to reengage students, who may have dropped out, through credit recovery, counselling, and educational plan development.
3. Paid and unpaid work experience that links academic and occupational education, employment opportunities, pre-apprenticeship programs, internships and job shadowing, and on the job training;	Work experiences are a planned, structured learning experience that takes place in a workplace for a limited period. Work experience may be paid or unpaid, and may take place in the private for-profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience where an employee/employer relationship exists, as defined by the Fair Labor Standards Act or applicable State law.
4. Occupational skills training,* as appropriate; particularly training that leads	Occupational skills training is defined as an organized program of study that provides

to industry recognized credentials aligned with in-demand industry sectors;	specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Such training must: (1) Be outcome-oriented and focused on an occupational goal specified in the individual service strategy; (2) Be of sufficient duration to impart the skills needed to meet the occupational goal; and (3) Lead to the attainment of a recognized postsecondary credential. *When youth are enrolled in academic or occupational skills training in WIOA programs, they must be assisted in earning an industry recognized credential and demonstrating a measurable skill gain.
5. Education* offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;	This program element reflects an integrated education and training model and describes how workforce preparation activities, basic academic skills, and hands-on occupational skills training are to be taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway. *When youth are enrolled in academic or occupational skills training in WIOA programs, they must be assisted in earning an industry recognized credential and demonstrating a measurable skill gain.
6. Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors, as appropriate;	Leadership development opportunities are opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors such as: (a) Exposure to postsecondary educational possibilities; (b) Community and service learning projects; (c) Peer-centered activities, including peer mentoring and tutoring; (d) Organizational and team work training, including team leadership training; (e) Training in decision-making, including determining priorities and problem solving; (f) Citizenship training, including life skills training such as parenting and work behavior training; (g) Civic engagement activities which promote the quality of life in a community; and (h) Other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee.

	(CFR § 681.520)
7. 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. Supportive services are also able to be provided and expenses incurred for youth in follow up.
8. Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;	(a) Adult mentoring for youth must: (1) Last at least 12 months and may take place both during the program and following exit from the program; (2) Be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee; and (3) While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis. (b) Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.
9. Follow-up services	Follow-up services are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services may include regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise. Partner4Work requires that follow-up services for WIOA Youth participants include at a minimum quarterly contact with each participant for a full 12 months following the program exit date.
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;	“Comprehensive guidance and counseling” provides individualized counseling to participants . In addition to drug and alcohol, this may include counseling for mental health, or a coordinated referral to an appropriate partner. If referred, coordination between provider and agency is necessary for continuity of service.
11. Financial literacy education;	Activities included in this program element may support in the ability to create budgets, initiate checking and savings accounts at banks, manage spending, and teach participants about the significance of credit scores.

12. Entrepreneurial skills training;	Entrepreneurial skills training provides the basics of starting and operating a small business. Skills associated with entrepreneurship may include: 1) Taking initiative 2) Creatively seeking out and identifying business opportunities and 3) Developing budgets.
13. Services that provide labor market information, such as career awareness, counseling, and exploration;	"Labor market information" includes the identification and/or analysis of topics such as employment, unemployment, local employment dynamics, and occupational projections.
14. Activities that help youth prepare for and transition to post-secondary education and training.	"Preparing for post-secondary education and training" may include SAT/ACT test preparation, exploring education options including technical training schools and community colleges, or providing support with financial aid applications.

SUPPORTIVE SERVICES

Supportive Services are intended to enable individuals to participate in WIOA activities. This section ensures appropriate and necessary [supportive services](#) to assist program [participants](#) are available in full compliance with the Workforce Innovation and Opportunity Act and its associated regulations.

SUPPORTIVE SERVICE REQUIREMENTS

The following are supportive service eligibility requirements for youth participants:

- Participant must be a WIOA eligible youth participant.
- Participant must be unable to obtain supportive services through other programs providing such services.
- Supportive services may only be awarded when necessary to enable participation in WIOA career services or training activities.

The WIOA Title I Youth 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 ISS 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 ISS. 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 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. 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 \$300 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 \$300 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.
- 11) **Assistance with textbooks:** A WIOA participant may receive up to \$300 in supportive service funds for the purchase of required textbooks only. Textbook purchases must be the lowest cost option available, including used editions, rental versions, digital/online formats, or other discounted options whenever feasible.

DISALLOWED SUPPORTIVE SERVICES

The following are prohibited to purchase 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.

As a best practice, wherever possible, purchases for supportive services should be made by the provider, directly to the merchant/vendor; this includes purchase of vendor-specific gas cards (e.g. GetGo, Sunoco, Shell). Under limited circumstances, when vendor-direct purchases are not available or possible, the subgrantee must obtain supporting documentation (i.e. receipts) for actual goods/service purchased to ensure the payment was used for the documented need and intended purpose.

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.

WYS20	Linkage to Community Services
WYS21	Transportation
WYS22	Childcare
WYS22	Dependent Care
WYS23	Housing
WYS24	Referral to Medical Services
WYS25	Assistance With Uniforms Or Other Appropriate Work Attire and Work-Related Tool Costs, Including Such Items As Eyeglasses and Protective Eye Gear
WYS26	Youth Stipend
WYS28	Reasonable Accommodations for Youth with Disabilities
WYS29	Other 1 - Driver's License & State Identification Card
WYS30	Other 2 - Non-employer paid licensing/certification or educational testing fees or Drug Testing and/or TB Testing
WYS31	Other 3 - Criminal Background Checks and/or Clearances
WYS32	Other 4 - Unions and Registered Apprenticeships Fees
WYS33	Other 5 -

YOUTH PAYMENTS

WIOA Youth allows for several forms of payments to be made available to program participants in the form of incentives, stipends, and wages. The following section articulates the distinction between these payments, and how incentives and stipends are permitted to be provided to participants enrolled in Partner4Work funded youth programs.

INCENTIVES	STIPENDS	WAGES
Incentive payments are awarded to participants in recognition of a measurable achievement directly tied to training activities or work experiences. Incentive payments must be awarded in response to a specific outcome achieved (e.g. credential attainment, job placement, placement in post-secondary education).	Stipends are predetermined, fixed payments that may be awarded to individuals for participation or attendance in training or work experience activities. Stipends 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.	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.

GENERAL REQUIREMENTS

Incentives and stipends must be provided in accordance with all federal, state, and local policies and requirements applicable to the program and/or funding stream. Each Partner4Work funded program that utilizes these must maintain a written policy that outlines a uniform and consistent strategy for issuing payments to program participants. Providers must submit this policy to Partner4Work for approval prior to issuing incentives or stipends for a program. Incentives and stipends must also be approved and budgeted for during the contracting process.

INCENTIVE REQUIREMENTS

Programs interested in providing incentives must receive approval from Partner4Work. Incentives must be permitted under all federal, state, and local policies and requirements applicable to the program and/or funding stream. Partner4Work will also consider other factors, including but not limited to funding availability and how incentives align with and support the achievement of program goals.

The following are the eligibility requirements for providing incentive payments:

- Participants must be active and in good standing with a program.
- Participants must be enrolled in an approved training program or be actively participating in work experience.
- Participants must have achieved an outcome listed as a goal within their individual service strategy (ISS).

At a minimum, the provider's incentive policy must include:

- The method, justification, and amounts for the issuance of incentives;
- The method by which gift cards for incentives are purchased (e.g. with a purchasing card), if applicable;
- The method by which gift cards for incentives are stored, if applicable; and
- The internal controls for incentive awards, including the staff responsible for approving an incentive.

Programs may not award direct cash payments to participants as part of an incentive strategy. The maximum amount permitted per incentive issued to a participant is \$100. Incentives must be administered in a manner that ensures all participants receive equal awards for equal achievements. Participants cannot receive multiple incentives for the same program achievement. Incentives must not include entertainment costs, such as movie or event tickets or gift cards to movie theatres.

Incentive payments may only be awarded in recognition of an achievement directly tied to training or work experience and must align with the goals of the program and participant goals in the ISS or [IEP](#). Examples include obtaining a GED, placement in employment, and retention of a job for 90 days. Funds may not be used for incentive payments issued as motivation for activities such as recruitment, submission of documentation, or completion/review of an ISS or IEP.

At least three individuals must sign off to indicate that an incentive has been awarded: two staff members of the service provider, who are familiar with incentive policy requirements, and the participant receiving the incentive.

The provider's written incentive policy must clearly describe this process. Providers may not have more gift cards on hand than enrolled participants at any given time (i.e. if a program has 25 enrolled participants, no more than 25 gift cards can be on hand at once. If a program has 100 enrolled participants, no more than 100 gift cards can be on hand at a time). Partner4Work encourages providers to limit the number of gift cards stored on site when possible. Providers should maintain a consistent method for purchasing gift cards where possible (e.g. purchasing card or company credit card).

Organizations providing incentives to participants should be aware of any implications under IRS provisions. Please consult www.irs.gov for more information. It is the responsibility of the service provider

to maintain required documentation detailing the distribution and management of incentives.

STIPEND REQUIREMENTS

The following are the eligibility requirements for stipends:

- Participants must be active and in good standing with a program.
- Participants must be enrolled in a training program or be actively participating in work experience.
- Participants must meet the participation or attendance requirements established in the provider's written policy for issuing stipends.

At a minimum, the provider's stipend policy must include:

- The justification for providing stipends and the specific attendance/participation levels that must be met for the issuance of stipends;
- The amount and method of payment for the issuance of stipends; and
- The internal controls for stipend payments, including but not limited to how participation/attendance will be documented and verified, and the staff responsible for approving the issuance of a stipend.

Stipend payments must only be issued for participation/attendance in training when there is a defined curriculum and criteria for completing the curriculum. Stipends may be issued for work experience, but must not replace wages when a wage is required to be paid. Stipends must only be issued for activities aligned with the goals of the program and participant goals outlined in the individual service strategy (ISS) or individual employment plan (IEP). Stipends must be administered in a manner that ensures all participants receive equal payments for equal levels of participation/attendance. Stipends must be based on levels of program participation or attendance, as defined in the provider's stipend policy (e.g. Attendance must be at 90% or above based on a nine-week grading period). Unlike a wage, stipends should **not** be based on an hourly rate. Providers are responsible for documenting participation/attendance in the activity as the basis of stipend payments.

At least three individuals must sign off to indicate that a stipend has been awarded: two staff members of the service provider, who are familiar with stipend policy requirements, and the participant receiving the stipend. The provider's written stipend policy must clearly describe this process. It is the responsibility of the service provider to maintain all records of participation/attendance (e.g. timesheets or attendance sheets) and the issuing of stipends (e.g. signed stipend approval forms). This information should be documented in the participant's case file.

Organizations providing wages or stipends to participants should be aware of any implications under IRS provisions. Please consult www.irs.gov for more information.

YOUTH WORK EXPERIENCE

Steadfast in the belief that youth learn to work by working, Partner4Work requires youth providers to use WIOA funds to assist youth in obtaining paid and unpaid [work experience](#) while enrolled in programs. This section sets requirements for employer participation in paid and unpaid work experience.

ELIGIBILITY

Participant Eligibility

All youth participants enrolled in WIOA services are eligible for participation in work experience activities, provided the activities are deemed in line with the individual's career plan and service strategy.

General Work Experience Employer Eligibility

Potentially eligible companies able to participate in youth work experience include: for profit businesses,

non-profit organizations, and public sector employers. Partner4Work youth providers are responsible for ensuring that the on-site supervisors of all youth participants placed in paid or unpaid work experience have all applicable child abuse and criminal background check clearances.

Paid Work Experience Employer Eligibility

The provider organization with which the youth is enrolled serves as the employer of record and is responsible for ensuring that wages are paid on time and in full. Non-profit, for-profit, and public entities are eligible to serve as paid work experience sites. A company will not be eligible to host a youth participant for work experience if:

- 1) The company has any other individual on layoff from the same or substantially equivalent positions.
- 2) The youth paid work experience would infringe upon the promotion or displacement of any currently employed worker or cause a reduction in their hours.
- 3) The same or a substantially equivalent position is open due to a hiring freeze.
- 4) The employer is a private for-profit employment agency, i.e. temporary employment agency, employee leasing firm, or staffing agency.

PROCEDURES

Provider must spend at least 25% of WIOA youth funding on paid or unpaid work experience, which may include staff time to develop and manage work experience opportunities or related wages and supportive services;

Partner4Work encourages providers to enroll youth in paid work experience where possible. Youth participants in work experience must have an up-to-date Individual Service Strategy reflecting the need for work experience.

Employer Requirements

With assistance from youth contractor staff, participating employers must guarantee that:

- 1) The training to be provided will be in accordance with the Workforce Innovation and Opportunity Act (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.
- 2) All applicable child labor laws are followed.
- 3) 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.
- 4) Ensure funds are not used to directly or indirectly assist, promote, or deter union organizing.
- 5) Employers must agree to respond to workforce development system staff requests for wage and retention information of participants.
- 6) Employers are expected to provide a job description before the start of the work experience and complete an exit survey upon completion of the work experience.

General Requirements

- 1) 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.
- 2) Provider costs of administering paid and unpaid work experience programs are allowable costs under this policy.

FOLLOW-UP SERVICES

Follow-up services for WIOA Title I Youth participants are critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. Follow-up services may include regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise. Follow-up services for youth also may include the following program elements:

- [Supportive services](#)
- Adult mentoring
- Financial literacy education
- Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services
- Activities that help youth prepare for and transition to postsecondary education and training

All youth participants must be offered an opportunity to receive follow-up services that align with their individual service strategies. Furthermore, follow-up services must be provided to all participants for a minimum of 12 months following the participant's exit date from the program.

Partner4Work requires that follow-up services for WIOA Youth participants include at a minimum quarterly contact with each participant for a full 12 months following the program exit date. Provider staff should determine if more frequent follow-up services are needed based on the participant's individual needs and education/career goals, as documented in their individual service strategy (ISS). Staff must document each follow-up service in the Commonwealth Workforce Development System (CWDS) through both service code entry and case notes. Follow-up services must include more than only a contact attempted or made for securing documentation to report a performance outcome.

Staff may end attempts to contact participants for follow-up services 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 Youth 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.

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.

PROGRAM/PROVIDER PERFORMANCE

DATA ENTRY & CASE MANAGEMENT

Once a participant has been verified as eligible, they must be entered into the official system of record for WIOA youth programs in Pennsylvania for participation to begin. The system of record for participant-level

workforce development data in PA is the Commonwealth Workforce Development System (CWDS). WIOA subrecipients agree to have all case managers or other staff trained in data entry and management in CWDS. Title I Youth program staff must recognize that CWDS is the sole [system of record](#) for WIOA services in the Commonwealth and agree that all WIOA program data will be entered therein.

The Individual Service Strategy (ISS) is central to data management and tracking; it is the mechanism to describe the goals for a young person, the services they participate in to meet the goals, and the accomplishments. The purpose of a case note is to provide a narrative that explains the context or reasons a client received a particular service in relation to that client's ISS; it should document client progress or setbacks, significant milestones and describe next steps. Together, the ISS, the service record, and the case notes for a participant should tell the full story of a youth's experience and provide justification for the provision of all services and opportunities.

Case management is a process of building relationships with participants, understanding clients to the extent that managers can help guide young people, and recommend services and training pathways that meet their needs. WIOA youth programs require that case management within a provider organization also includes extensive data collection and management within guidelines set in WIOA and defined by Partner4Work staff.

All case notes, assessment results, service plans and participant accomplishments must be recorded in CWDS with regular entries and updates occurring every 30 days at the latest.

CASE NOTES AND SERVICE CODES

Services delivered to individuals are tracked in CWDS through the use of CWDS service codes. The use of service codes has a direct relationship to federal reporting and WIOA performance indicators and should be evaluated closely to ensure the service provided aligns with the definition of the service code selected for entry into CWDS.

PERFORMANCE MEASURES

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 [TEGL 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.

CRITERION	PERFORMANCE STANDARD
Programmatic Retention The percentage of participants who start and complete the program.	90%

Measurable Skills Gain The percentage of program participants who, during a program year , are in an education or training program that leads to a recognized postsecondary credential or employment and who have achieved a measurable skills gain toward such a credential or employment. Note: Participants enrolled in a program in multiple program years must demonstrate a measurable skill gain <u>each program year</u> .	85%
Obtainment of a Degree or Certificate The percentage of participants who have attained a diploma, a high school equivalency, or industry recognized credential within one year after exit from the program. In the case of individuals who obtain a high school diploma or its recognized equivalent, the individual must also have obtained or retained employment or must be enrolled in an education or training program leading to a recognized postsecondary credential within one year after program exit.	85%
Positive Outcome at Exit The percentage of participants who are placed into employment (including the military), enrolled in post-secondary education and/or advanced training/occupational skills training, or have a participating WIOA Adult case at program exit.	85%
Employment (2nd Quarter after exit) The percentage of participants who are employed (including the military) or enrolled in post-secondary education and/or advanced training/occupational skills training during the 2nd quarter after the exit quarter.	75%
Employment (4th Quarter after exit) The percentage of participants who are employed (including the military) or enrolled in post-secondary education and/or advanced training/occupational skills training during the 4th quarter after the exit quarter.	65%
Median Earnings Median earnings of participants who are in unsubsidized employment during the 2nd quarter after program exit.	\$3,500
Exposure to Priority Industries: Percentage of participants whose work experiences or credentials align with one of the following industries: healthcare, technology, financial services, construction or manufacturing.	10%

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: The Office of Management and Budget (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 must be encrypted. All PII stored onsite must be kept safe from unauthorized individuals at all times 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.

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.

GLOSSARY OF TERMS

Hyperlinked words throughout this manual will bring the reader to the definition below, when engaged.

ATTENDING ANY SCHOOL: Youth receiving services from any one of the 'public' or 'non-public' institutions listed in the table below, as well as those being home-schooled or privately tutored, would be considered "attending school" for the purpose of WIOA Title I youth eligibility determination. A youth enrolled at a [post-secondary institution](#) would also be considered to be "attending school."

Public Schools	Non-Public Schools
• School districts • Charter schools • Cyber charter schools • Area career and technical schools • Intermediate units	• Private academic schools • Non-public schools (operated by a bona fide church or religious body) • Private academies and boarding schools • Private Residential Rehabilitative Institution
Post-Secondary Institutions (Public or Private)	
• Community college • 2-year college • College • University • Authorized degree granting institution (Pennsylvania Dept. of Education)	

For the purpose of WIOA Title I-B youth eligibility determination, the Department of Labor considers individuals who are enrolled in adult basic education/GED preparation, skills training, or other remedial education programs including those offered through publicly and privately funded adult basic education

programs, YouthBuild or Job Corps programs, to be “not attending school”.

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.

HOMELESS INDIVIDUAL: “Homeless Individual” means an individual who currently 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
 - Is awaiting foster care placement;
- 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;
- Is a migratory child who, in the preceding 36 months, was required to move from one school district to another due to changes in the parent’s or parent’s spouse’s seasonal employment in agriculture, dairy, or fishing work; or
- Is under 18 years of age and absents themselves from home or place of legal residence without the permission of his or her family (i.e. runaway youth)

(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.)

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.

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.

INDUSTRY-RECOGNIZED CREDENTIAL: Credentials “industry-recognized,” are defined by the U.S. Department of Labor as “either developed and offered by, or endorsed by a nationally recognized industry association or organization representing a sizable portion of the industry sector, or a credential that is sought or accepted by companies within the industry sector for purposes of hiring or recruitment which may include credentials from vendors of certain products.” Utilize the [Postsecondary Credential Attainment Decision Tree](#) to assist in making determinations about whether individual credentials count toward WIOA performance indicator.

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, or was determined eligible to receive, Food Stamps in the last six months
- [Homeless](#)
- Publicly supported Foster Child
- Individual with a disability and own income is 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 25% (set every 5 years, using American Community Survey (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 ISY. In schools where the whole school automatically receives free or reduced-price lunch, programs can check with their local school districts to determine whether individual students are eligible.

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

NOT ATTENDING ANY SCHOOL: "Not attending any school" means a youth not receiving services from a public school, charter school, cyber charter school, career and technical school, sectarian school, or private school. Individuals who are enrolled in adult basic education/GED preparation, skills training, or other remedial education programs, including YouthBuild and Job Corps are not attending any school for the purposes of this policy.

Note: Locally, Partner4Work recognizes youth within the compulsory school age, who have not attended school for at least the most recent complete school year calendar quarter to be included in the definition of "not attending any school".

OFFENDER: "Offender" means an adult or juvenile who:

- 1) Is or has been subject to any stage of the criminal justice process, and who may benefit from WIOA services; or
- 2) Requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

PARTICIPANT: For local adult, dislocated worker, and youth 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.

PERSONALLY IDENTIFIABLE INFORMATION: Office of Management and Budget (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.

POST-SECONDARY INSTITUTION: The State of Pennsylvania defines "Postsecondary institution" as community college, 2-year college, college, university, or other authorized degree granting institution

approved by the Department of Education in accordance with Chapters 31 and 40 (relating to higher education general provisions; and institutional approval).

REQUIRES ADDITIONAL ASSISTANCE: “An individual who requires additional assistance to complete an educational program or to secure or hold employment” is defined by Partner4Work as a youth who meets one or more of the following criteria:

- Educational Needs:
 - Has an Individualized Education Program (IEP);
 - Currently one or more grade levels behind their peer group; or
 - Has earned some post-secondary education credits, but did not complete a post-secondary program and is not currently enrolled in post-secondary education.
- Employment Needs:
 - Has never been employed;
 - Has been actively seeking employment for at least two months and remains unemployed or underemployed;
 - Has been fired from at least one job within the previous 12 months; or
 - Has had three or more jobs within the previous 12 months.
- Living Arrangements
 - Lives in a home in which only one or neither of their natural parents are present, due to incarceration, institutionalization, death, or other factors;
 - Currently resides in a government subsidized shelter or institution like a group home, rehabilitation facility or shelter for victims of domestic violence; or
 - Is an emancipated youth or latchkey youth.
- Historically Disenfranchised and Marginalized
 - Is an individual who has been historically underserved and marginalized as a result of race, national origin, sexual orientation, or gender identity;
 - Is a migrant Youth or an individual determined eligible for Deferred Action for Childhood Arrivals (DACA) Program; or
 - There is an underrepresentation of the participant’s race, national origin, gender identity, or sexual orientation within their industry of choice.
- Additional Barriers to Education or Employment
 - Has a lack of or limited access to a personal vehicle and/or lives more than 1 mile from the closest or public transportation stop to attend education/training or employment;
 - Is currently receiving services from a human services agency...
 - Has been referred to, or is being treated by, an agency for a substance abuse related problem; or
 - Is a victim of abuse or resides in an abusive environment as documented by a school official or professional.

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.

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.

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.

WORK EXPERIENCE: The term “Work Experience” means paid or unpaid employment and training provided by an employer or provider to a participant while engaged in productive work in a job that:

- 1) Is limited in duration.
- 2) Provides knowledge or skills essential to the full and adequate performance of the occupation.
- 3) Must include academic education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation.

In addition to the preceding list, “Paid Work Experience” must also adhere to Commonwealth of Pennsylvania minimum wage laws, and:

- 1) Provide reimbursement to the employer for a portion of the wage paid to the participant during the paid work experience period; or
- 2) Provide a portion or all of the wage paid directly to the participant through the Partner4Work contractor through which the youth is receiving services.

REFERENCES

ELIGIBILITY

- WIOA Section 3(2), (5), (15), (16), (36)
- WIOA Section 129(a)(1)(B) and (C)
- Training and Employment Guidance Letter (TEGL) 21-16 (March 2, 2017)
- Training and Employment (TEN) Notice No. 22-19
- [US Selective Service System FAQs](#)
- [WSG 03-2015](#)
- 20 CFR § 688.120
- [22 Pa. Code § 11.8](#)
- [TEGL 09-22](#)
- [TEGL 23-19 ch. 3](#)
- [TEGL 10-23](#)
- [Youth Eligibility Definitions -WSP](#)

- Workforce System Policy (WSP) – Self-Attestation (April 2, 2026)

WIOA YOUTH PROGRAM ELEMENTS

- TEGL 21-16

SUPPORTIVE SERVICES

- WIOA Section 3(59)
- 20 CFR §680.900

INCENTIVES

- WIOA Final Rule - 20 CFR 681.640
- U.S. Office of Management & Budget (OMB), Uniform Guidance, 2 CFR Part 200
- U.S. Department of Labor Wage and Hour Division, Wages and the Fair Labor Standards Act
- U.S. Department of Labor Wage and Hour Division, Youth Employment Compliance Assistance Toolkit
- U.S. Internal Revenue Service, Publication 525 (2019), Taxable and Nontaxable Income

STIPENDS

- WIOA [Final Rule](#) - 20 CFR 681.640
- U.S. Office of Management & Budget (OMB), [Uniform Guidance](#), 2 CFR Part 200
- U.S. Department of Labor Wage and Hour Division, [Wages and the Fair Labor Standards Act](#)
- U.S. Department of Labor Wage and Hour Division, [Youth Employment Compliance Assistance Toolkit](#)
- U.S. Internal Revenue Service, Publication 525 (2019), [Taxable and Nontaxable Income](#)

YOUTH WORK EXPERIENCE

- WIOA Section 129(c)(2)(C)
- WIOA Section 129(c)(4)

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

ELIGIBILITY

Date	Update
07/01/2024	- Revised eligibility section to align with federal and state guidance on the use of self-attestation/self-certification for WIOA Youth participants. - Revised definition table for “Attending School” to align with PA Department of Labor & Industry Youth Eligibility Definitions WSP.
02/25/2025	- Added subsection on secondary eligibility review requirements to align with PA Department of Labor & Industry Guidance Regarding Supervisory/Second Level Review of Eligibility Determinations - Revised local definition of “requires additional assistance” to align with TEN 21-24
07/01/2026	Revised to reflect updated Federal and State guidelines on the use of self-certification/self-attestation.

SUPPORTIVE SERVICES

Date	Update
12/15/2023	- 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.
/01/2024	- 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.
07/01/2025	Revised the WIOA Youth policy guide to correct the Commonwealth Workforce Development System (CWDS) service codes assigned for supportive service provisions.
07/01/2026	- Increased the Clothing/uniform allowance to \$300 based on PY2025 exception data. - Increased the Equipment/tools allowance to \$300. - Added textbooks as an allowable supportive service category, up to \$300. - Added language to clarify that supportive service payments must be made directly to vendors whenever possible. When vendor-direct payment is not available, subgrantees are required to retain documentation verifying the purchase.

PERFORMANCE INDICATORS AND GOALS

Date	Update
07/01/2025	Revised the subsection to align with PY2025 determinations.

POLICY EXCEPTIONS

Date	Update
03/25/2026	The link in this policy has been updated to direct users to the new request form.

SELF-CERTIFICATION FORM

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

Participant ID: _____		Application Date: _____	

I HEREBY CERTIFY UNDER PENALTY OF LAW, THAT THE FOLLOWING INFORMATION IS TRUE:

I ATTEST THAT THE INFORMATION STATED ABOVE IS TRUE AND ACCURATE AND UNDERSTAND THAT THE ABOVE INFORMATION, IF MISREPRESENTED, OR INCOMPLETE, MAY BE GROUNDS FOR IMMEDIATE TERMINATION AND/OR PENALTIES SPECIFIED BY LAW.

APPLICANT'S SIGNATURE/DATE

APPLICANT'S PHONE NUMBER

APPLICANT'S ADDRESS

SIGNATURE OF PARENT OR GUARDIAN (as needed)

The above Self-Certification is being utilized for verification of the following eligibility criteria:

CERTIFICATION

I certify that the individual whose signature appears above provided the information recorded on this form.

Counselor's Signature/Date: _____

Reviewer's Signature/Date: _____

APPENDIX B

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: ☐ REMOTE SITE ELIGIBILITY, NO COPIER AVAILABLE.
☐ ON SITE ELIGIBILITY, NO COPIER AVAILABLE.
☐ DOCUMENT CANNOT BE COPIED

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.

OR

I ATTEST THAT THE DOCUMENT INSPECTION VERIFIED THE PRIMARY/SECONDARY ITEMS REQUIRED TO DETERMINE ELIGIBILITY FOR THE WIOA PROGRAM.

ELIGIBILITY SPECIALIST'S SIGNATURE _____

DATE _____



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:



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**