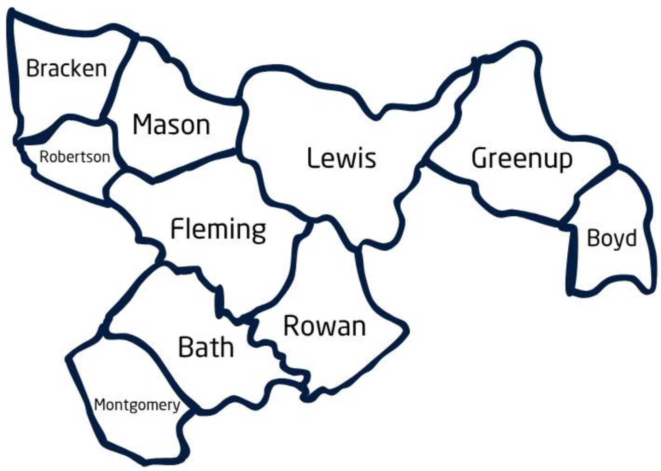
TENCO

WORKFORCE DEVELOPMENT AREA

POLICIES & PROCEDURES



July 1, 2026 - June 30, 2027

Kentucky Career Center
Career Training Employer
TENCO

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POLICIES

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Policy 01 Residency 9.23

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 1

Residency Policy

Effective: November 9, 1999

Revision: June 28, 2005; February 18, 2009; February 16, 2011; July 1, 2015, to reflect WIOA guidelines; May 18, 2016; September 6, 2023

Reviewed – no changes: 4/24/14

Adult Population:

Priority for individualized career and/or training services through the TENCO Workforce Development Board shall be given to adults (18 and up) who reside in the TENCO Workforce Development Area (WDA). Individuals residing outside of the TENCO area will be referred to the workforce area in which the individual resides (in-state or out-of-state). If services are not available through the area in which they reside, the individual may seek services through the TENCO workforce area.

Dislocated Workers:

In the event a layoff occurs, priority for individualized career and/or training services will be given to the individual residing in or dislocated from a business located in the TENCO area. If an individual resides outside the TENCO area, individuals will be served or referred for services based upon the most convenient location to the individual.

Youth:

Workforce services for youth who are attending a secondary school will be provided to residents of the TENCO area or to youth who reside outside of the TENCO area, but attend a secondary school located in the TENCO area. Youth who are not attending secondary school will follow the residency policy established for adults and dislocated workers, as appropriate. Priority should be given to youth who live in the TENCO area.

Providers of training services:

Providers of training services may be located outside of the TENCO workforce area.

Recruitment:

As priority of service should be given to individuals who reside in the TENCO workforce area, recruitment should not occur outside of the local area.

The TENCO Workforce Development Board holds the right to limit funded services for individuals that do not reside and/or are not dislocated from the local area.

Policy 02 Support Services 5.21.25

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 2

Supportive Services

Effective: Revised 5/8/01 – (Effective 7/1/01)

Revised: May 3, 2004, January 1, 2006; August 27, 2008 – Effective 9/1/08; : February 18, 2009; June 7, 2013; May 21, 2014; May 16, 2018; September 6, 2023; May 21, 2025

Supportive Services, such as mileage, childcare assistance and supplies are allowable services for Adult, Dislocated Worker, and Youth participants who are attending short-term prevocational or occupational skills training services. WIOA Career Counselors will ensure participants have funds available to pay for tuition costs prior to approving supportive services.

Mileage/Transportation:

The cost of mileage incurred by a participant receiving short-term prevocational services or training services through the TENCO Workforce Development Board may be provided at the rate of .43 per mile or the actual cost of public transportation (documentation required), up to $20.00 per day. Mileage assistance may be available if a participant's unmet educational need exceeds the amount available from other sources of funding. Participants may request payment for one round trip to training daily. The participant's need for mileage assistance shall be documented on the TENCO Financial Analysis form. TENCO will not be responsible for parking fees. A documented source such as google maps or MapQuest must be utilized to confirm the miles from the customer's home to their training and/or clinical site.

When the participant requests funding assistance for the cost of public transportation or a carpool, a receipt for the cost incurred shall be provided by the driver of the vehicle and included with the participant's supportive service request form. Transportation assistance is limited to one round trip per day.

Individuals who attend training virtually are ineligible for mileage assistance, unless documentation is provided to reflect an in-person class or meeting is mandated to fulfill requirements of the virtual class.

Childcare Assistance:

Funding for childcare expenses may be available to participants receiving short-term prevocational assistance or occupational skills training services for children requiring all day or after school care, through age 12. Exceptions for age limitations will be made for children with disabilities or special circumstances requiring an adult's supervision or care. The financial need for childcare assistance shall be documented on the TENCO Financial Analysis Worksheet by a TENCO Career Counselor.

Childcare funding by the Workforce Development Board will not exceed the actual cost of childcare, after consideration of other sources of childcare funding, up to the following rates:

$20.00/day for one child; $26.00 / day for two children; $35.00/day for three children; $46.00/day for four or more children. Maximum amount per week is $200.00 per week.

Childcare funding may offset the balance remaining, not to exceed a daily total specified above, after consideration of other sources of funding (state childcare assistance program or other). However, the total of all sources of childcare funding shall not exceed the actual cost of daily childcare.

Childcare services may be provided by any individual 18 years and older, other than a spouse or an individual living in the household of the child and/or participant. All participants shall submit a childcare form signed by the childcare provider for costs incurred. The Workforce Development Board will not be responsible for ensuring each childcare provider is paid for costs incurred. It is the responsibility of the childcare provider to collect payment for services rendered.

Participants who attend training virtually are eligible for childcare services. Individuals will self-attest their class attendance on the Mileage and Childcare Reimbursement form. Documentation from the childcare provider will be received verifying the days the child was in childcare. The childcare rates for participants attending virtual training programs are the same as participants who attend in-person.

TOTAL FUNDS ALLOCATED FOR PARTICIPANTS PER YEAR FOR TRAINING EXPENSES, SUCH AS TUITION, FEES, BOOKS, MILEAGE, CHILD CARE, SUPPLIES, TESTING, ETC. MUST NOT EXCEED THE MAXIMUM TOTAL AMOUNT ALLOWABLE PER PARTICIPANT AS REFERENCED IN POLICY 7.

Policy 03 Out of Area Job Search 9.23

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 3

Dislocated Worker Out-of-Area Job Search

Effective November 1, 1999

Revision: June 28, 2005; February 18, 2009; May 16, 2018

Out-of-Area job search assistance may be provided to enrolled dislocated workers, if employment within the area in which the participant has a marketable skill or training is not available. Out-of-are job search shall be defined as seeking employment more than 50 miles from the participant's current residence. The participant must have confirmed scheduled interview(s) and received approval by the TENCO Career Counselor prior to conducting their out-of-area-job search. The following assistance will be available for out-of-area job search:

- Mileage for participant's vehicle at the current rate established by the TENCO Workforce Development Board not to exceed the maximum allowable.
- Meal expenses based on the current Buffalo Trace Area Development District per diem rate for each meal;
- Lodging expenses, not to exceed $100.00 per night at a commercial hotel/motel, not to exceed two (2) nights of lodging.

Participants will be limited to a total of three (3) out-of-area job searches, up to $400.00 per job search.

Out-of-area job search will be reimbursed upon receipt of the out-of-area job search reimbursement request, original receipts for expenses. Meal allowances do not require receipts due to per diem rate established by the Administrative Entity.

Policy 04 Relocation Assistance

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 4

Dislocated Worker Relocation Assistance Policy

Effective: November 9, 1999

Revision: 5/10/2000; 2/18/2009; 5/21/2014; 5/16/2018

Relocation assistance will be available for eligible dislocated workers who have accepted employment outside of their commuting area. The commuting area is defined as 100 miles one-way from the residence of the participant. Relocation assistance shall be requested prior to relocating the participant's family. Requests will not be approved retroactively.

Relocation assistance funds may be used for the following expenses, upon approval by a WIOA Counselor and receipt of an original invoice provided by the participant:

- Packing or moving expenses by a commercial carrier;
- Truck or trailer rental, including gasoline expenses;
- Mileage for participant-owned vehicle at current mileage rate;
- Daily lodging and meal expenses while in travel status (2 days maximum).

Lodging Expenses shall not exceed $100.00 per night at a commercial hotel/motel.

Meal Expenses, per individual in the immediate family, shall not exceed the current per diem rate for each meal as specified in Buffalo Trace Area Development District policy (No receipts required for per diem).

Immediate family is defined as: two or more persons related by blood, marriage, or decree of court, which are living in a single residence, and are included in one or more of the following categories:

(Workforce Investment Definition per WIOA Regulation)

A. Husband, wife and dependent children
B. A parent or guardian and dependent children.
C. A husband and wife.

The WIOA Counselor may approve relocation assistance if the following conditions are met:

- The participant shall be registered (enrolled) as a TENCO dislocated worker and/or Trade;
- The participant has accepted regular full-time employment;
- The new job necessitates a physical relocation of the household. The WIOA Career Counselor shall verify that the new employment is at least 100 miles one way from the current residence of the participant, per map mileage, atlas, or other reliable source;
- Relocation assistance must be approved before the participant has moved;
- Relocation of the household must take place within 90 days of starting the new job;
- The participant's relocation costs are not being paid through other sources. However, if an outside source is assisting with relocation expenses, and the expenses exceed the amount paid by the outside source, the difference may be paid with dislocated worker or Trade funds.

Upon completion of the appropriate Relocation Request form, reimbursement for relocation assistance will be made for actual costs, **up to the amount of $1200.00 per dislocated worker for a total of one relocation.**

The request for reimbursement must be submitted within 30 days from the date expenses were incurred.

Policy 05 Board Compensation and Travel Policy

TENCO WORKFORCE INVESTMENT BOARD

Policy No. 5

Board Policies

Board Compensation and Travel Policy

Effective: October 1, 1999

Revision: February 18, 2009

Reviewed – no changes: April 24, 2014

Members of the TENCO Workforce Investment Board shall serve without compensation. However, members may be reimbursed for reasonable travel expenses incurred during the course of WIB activities, in accordance with Administrative Entity policies.

Procedure:

Reimbursement for travel costs incurred by Board members in the performance of official Board business or Workforce Development conferences while away from the member's regular course of duties will be allowable. Travel reimbursement will be limited to the following expenses: Transportation or mileage, food, lodging, tolls, tips, vehicle rental.

1. Transportation: Travel expenses will be covered for reasonable personal or public transportation, using the most economical means of travel. The actual cost of air or land travel fares will be paid, not to exceed the cost of accommodations for air coach class, unless only first class is available. When personal vehicles are used for travel, the mileage rate paid based on the current Buffalo Trace ADD rate. When ground transportation costs exceed public transportation by air coach class fares, a Board member will be reimbursed at the specified mileage rate, not to exceed the total of the airline ticket.
2. Lodging: Board members will be reimbursed for the actual cost of lodging with a receipt required on all lodging expenses claimed. The Administrative Entity will make arrangements for Board member accommodations for lodging.
3. Meals – Meal expenses, when not included with a conference, will be paid on a per diem basis, in accordance with policies established by Buffalo Trace Area Development District Board.
4. Other – Tolls, parking, baggage, tips, car rentals are allowable when necessary for conducting business of the Board, up to the actual amount paid for such expenses. Receipts are required for expenses over $2.00 per incident.
5. Authorization and Compensation:
    a. All out-of-state travel will be approved by the Workforce Development Director.
    b. Official travel will be conducted using the most economical means or standards available via the most direct routes. Commercial airline travel will be limited to coach class, unless coach class is unavailable.
    c. Reimbursement will not be made for entertainment or alcoholic beverages. Reimbursement for meals will be made on a per diem basis.
    d. Reimbursement will not be made for personal telephone calls.
    e. Buffalo Trace Area Development District will reimburse Board members for travel expenses within 30 days upon receipt of the request for reimbursement. Travel requests shall include necessary receipts and/or information to justify the amount requested for reimbursement.
    f. In the event funding does not permit members of the Board to travel out-of-state, the following priority will be implemented: Chairperson, Vice-Chair, Secretary, immediate past Chairperson, ex-officio members of the Executive Committee to be determined on a basis of

attendance at meetings. Prior approval shall be granted by the Workforce Development Director.

g. All expenses must be reconciled in accordance with federal, state, and local policies.

Policy 06 Payment on Board Member Registration Fees

TENCO WORKFORCE INVESTMENT BOARD

Policy No. 6

Board Policies

Payment of Board Member Registration Fees

Effective: October 1, 1999

Revision: February 18, 2009

Reviewed – no changes: April 24, 2014

Buffalo Trace Area Development District will pay professional workforce development organization registration and membership fees required for Board members to participate in Workforce Development conferences or professional development training. Registration with professional workforce development organizations will be allowable only when necessary in conducting business or travel for the Workforce Investment Board. Board members should notify the Director if other sources of funding are available to pay the cost of registration or fees on behalf of the member. Payments to professional workforce development organizations for registration or membership fees shall receive prior approval from the Workforce Development Director.

Policy 07 Limitation on Costs 5.21.25

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 7

Limitation on Costs

Effective: 06-16-03

Revision: June 28, 2005; January 1, 2006; February 18, 2009; February 16, 2011 – Effective July 1, 2011; June 7, 2013; May 21, 2014; : May 18, 2016; May 18, 2019; December 18, 2019; May 21, 2025

TENCO Workforce Development Board will authorize payments for adult, dislocated worker and youth for **tuition, fees, textbooks, supplies/testing, and supportive services** through individual training accounts, participant reimbursement, or within the contract in which they are enrolled. Contracts must adhere to TENCO's Limitation on Costs policy. The following is the limitation on funding to be provided to WIOA adult, dislocated workers and youth participants.

- TENCO may approve up to a **maximum** of $6,000 for costs associated with occupational skills training per fiscal year (July 1 – June 30). This limitation includes tuition, fees, textbooks, supplies/testing, and supportive services. On-the-Job Training, Internships/Work Experience, Relocation, and Out-of-Area costs are not included in this limitation.
- Occupational skills training programs that are twelve (12 months) or less and reflect successful past performance defined as:
  - 75% graduation rate; and
  - 70% employment in the field of study during the second quarter after exit.

may be approved up to a maximum of $10,000 per-training program for costs associated with their occupational skills training. Performance will be calculated from the previous fiscal year data. Participants attending short-term training (twelve month or less) programs that do not have performance data available and/or do not meet the performance indicated above remain eligible for funding at the $6,000.00.

- At the discretion of the TENCO Workforce Development Director, up to 5% of the total formula funds available may be used to increase the limitation of funding. The Workforce Development Career Counselor will be required to justify in writing the request to increase funding levels above the máximum. The Director shall approve or deny the request in writing and submit to the Workforce Development Career Counselor, Program Coordinator, and Fiscal department.

Tuition and Fees: Tuition expenses and educational fees may be paid. This applies to tuition and fees for on-campus, off-campus, and internet-based courses toward the completion of a course of study. Tuition and fees are to be paid via a Voucher system. These costs are not reimbursable to the customer.

Text and Reference Books: To be allowable, the text or reference book must be required or recommended by the instructor of the course in which the participant is enrolled and must correspond to the subject matter of the chosen course of study. This applies to text or reference books for on-campus, off-campus, and internet based courses. These costs may be paid via voucher and/or reimbursed to the customer after receiving adequate documentation.

Supportive Services: Supportive services in the form of transportation and/or child care assistance may be reimbursed to the participant at the rate identified by TENCO's policy number two. Supplies/testing required by an educational institution to complete a field of study and/or obtain a required certification /license may be paid as part of a support service for participants. Supplies must be approved by TENCO. A supply list will be maintained by TENCO staff. Excluded supplies include: firearms or weapons, ammunition, medicines, computers and general school supplies, such as notebooks, pencils, or paper. Supply costs may be paid via voucher and/or reimbursed to the participant after receiving adequate documentation.

If tuition, fees, textbooks, supplies/testing, and/or supportive service costs exceed the maximum amount allowable, the participant may select the item(s) to be paid through WIOA funds and will assume the responsibility for the balance.

Policy 08 Coordination with Pell and other Funding Sources

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 8

Coordination with Pell

and Other Funding Sources

Effective: November 1, 1999

Revision: June 28, 2005; February 18, 2009; August 21, 2019; May 20, 2020

Reviewed – no changes: April 24, 2014

Career Counselors shall document a student's total cost of education and availability of grant funding prior to obligating training funds. All participants enrolled in occupational skills training will be required to apply for Federal Financial Aid. Pending and/or available Financial Aid (exclusions include Veteran Benefits and Loans) identified by the school or student at the time of the WIOA budget worksheet completion must be obligated toward tuition and fees. If a student's financial aid award changes after WIOA funds have been obligated, adjustments shall be made to the individual's budget worksheet.

Exceptions include programs and/or schools that are ineligible for Federal Financial Aid, such as programs offered through Workforce Solutions. Career Counselors will obtain and upload documentation to support the ineligibility of programs and/or schools.

WIOA funds, up to limits established by the Board, may be allocated on behalf of a participant whose educational costs exceed the amount available through other funding sources, excluding student loans and veteran benefits.

Policy 10 Self Sufficiency effective 031124

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 10

Self Sufficiency

Effective: March 11, 2003

Revision Date: June 28, 2005; February 18, 2009; August 19, 2015; May 18, 2016; March 2, 2021; December 14, 2022; March 11, 2024

Reviewed – no changes: April 24, 2014

Adults:

The TENCO Workforce Development Board defines self–sufficiency for WIOA Adults as individual income of $29,121.00 or more per year. Individuals earning a self-sufficient wage (calculated by wages earned during the last 6 months X 2) are ineligible for funded career and/or training services through WIOA formula funds unless the individual can document a company lay-off or termination and/or they meet one of the exceptions below.

Exceptions:

- Incumbent worker projects are designed to increase competitiveness of the employee and employer, avert potential layoffs, and assist employees in retaining their current job or be promoted within their company.
- OJT applicants who are currently employed may be enrolled with a current wage of $29,121.00 or more if their wages will be increased by 25% through enrollment into the OJT.
- Career Pathway is designed to assist individuals in advancing their careers.
- Layoff Aversion projects which are designed to prevent individuals from losing employment.

The TENCO Workforce Development Board may, by majority vote, select to waive the self-sufficiency policy for special projects that will benefit the community and assist in closing the skill gap in Kentucky. Documentation supporting the waiver of such policy will be maintained in the project and/or participant file.

NOTE: The previous version of Policy 10 is viable through March 22, 2024 for individuals who have already started the eligibility process under those guidelines.

Policy 12 Out-of State Training

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 12

Out-of-State Training

Effective: February 8, 2000 (Revised 5/10/2000)

Revision Date: June 28, 2005; August 21, 2019

Reviewed – no changes: April 24, 2014

The TENCO Workforce Development Board has established a priority for referral of eligible adults, dislocated workers, and youth to training institutions located in the Commonwealth of Kentucky. Out-of-State training institutions may be utilized if training for a specific field of study is not available in Kentucky, provides opportunity for earlier graduation, or training in KY is not located within a reasonable commuting distance for the participant **(within 30 miles from the residence of the participant). If the participant anticipates encountering difficulty with traveling the distance as specified by the Board (transportation, child care, etc.), TENCO WDA Counselors may evaluate each circumstance on an individual basis.** Case notes shall reflect the rationale for referral of a participant to an out-of-state institution.

All training providers must be included on the statewide Eligible Training Provider List and/or through an agreement between the state in which the institution exists and Kentucky to be eligible for an Individual Training Account/Voucher.

Policy 13 Conflict of Interest

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 13

Conflict of Interest

Effective:

Revision Date: May 21, 2014

Members of the TENCO Workforce Development Board, WDB Committees, and WDA staff shall not receive compensation, gifts, or gratuities from organizations, business concerns, or individuals with whom the Board has official business relationships. These limitations do not apply to acceptance of articles of negligible value that are distributed generally. Members may receive reimbursement for travel costs incurred if the member is required to travel for conducting business of the Board. Board, and committee members shall follow the TENCO Workforce Development Board policy regarding travel reimbursement and rates.

Conflict of Interest:

(KRS 45A.340) – "No officer or employee of an agency or organization may be in any manner interested, either directly or indirectly, in his own name or in the name of any other person, association, or organization, in any contract for the performance of any work in the making or administration of which officer or employee may be called upon to act or vote. No such officer or employee may represent, either as agent or otherwise, any person, association, or organization with respect to any application or bid for any contract or work in regard to which such officer or employee may be called upon to act or vote. Nor may any such officer or employee take, solicit, or receive, either directly or indirectly, any money or other things of value as a gift or bribe or means of influencing his vote or action in his/her official character. Any contract made and procured in violation thereof is void."

A conflict of interest would exist if a member of the Board, Committee or staff participates in decisions that would financially benefit:

i. The individual
ii. Any member of the individual's immediate family (parents, spouse, children, siblings, aunts, uncles, cousins, grandparents, in-laws, step-parents, step-children, and/or anyone living in the household)
iii. The individual's partner
iv. An organization that employs, or is about to employ, any of the above, that has a financial or other interest in the firm or organization selected for award or,
v. A co-worker or co-workers family, as defined above.

Members of the Board, Proxies, WDB Committees and staff who may have a real or apparent conflict of interest will be required to disclose and refrain from participation during discussion or consideration of funding the project or proposal.

Disclosure Statement:

All Board and WDB Committee members shall disclose, prior to any vote, any direct or indirect personal, family or business relationship with any vendor or service provider with whom the Board are considering doing business directly or through the Administrative Entity. Members of the Board and WDB Committees and staff will be required to complete a disclosure statement one time each fiscal year that discloses to the Workforce Development Director all associations or organizations in which the Board/Committee member or staff person is involved. This will ensure that the Director is aware of any real or apparent conflicts of interest that may arise with regard to funding projects or the delivery of services by specific organizations or associations. This disclosure statement will remain on file at the office of Buffalo Trace Area Development District.

Policy 14 Short Term Pre Vocational Assistance 07242025

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 14

Short-Term Pre-Vocational Assistance

Effective: May 8, 2001 (Revised 12/4/01)

Revision Date: July 1, 2008; February 18, 2009; February 16, 2011; May 26, 2011; May 16, 2012; June 7, 2013; May 21, 2014; July 24, 2025

Participants served by TENCO Workforce Development Area through Individualized Service opportunities may receive funding to support short-term pre-vocational assistance for the following purposes:

Regulatory/Certification Standards: Examples – OSHA, TWIC, tow motor certification, other short-term development of skills that could assist individuals in gaining and/or retaining employment.

Social/Soft skills development - development of learning, communication, interviewing, punctuality, and/or personal maintenance skills; development of professional conduct skills; and skills necessary to prepare individuals for unsubsidized employment or training.

Basic computer classes - Classes that will not lead to a formal credential, but will enhance the participant's employment opportunities

Resources to pay for pre-vocational services will be leveraged through other entities, if possible, prior to WIOA funds being expended.

Case notes shall include the rationale for approving such assistance and describe the assistance to be provided. All other sources of funding shall be accessed prior to obligation of Title I funds for this purpose.

Providers of short-term pre-vocational assistance may include, but are not limited to the following organizations:

- The Workforce Development Area One Stop Career Center;
- Career Center partner agencies;
- Local Educational Institutions (secondary, post-secondary, vocational, or proprietary);
- Public or Private organizations experienced and capable of providing such assistance to those served.

General Guidelines:

Such assistance ***shall not lead to a formal credential***. A list of providers and a description of services will be made available at the career centers. Providers will not be guaranteed the referral of a specific number of individuals. Referrals will be based on participant need and the service to be provided in assisting the individual to obtain long-term employment at a self-sufficient wage. The WDA Career Counselor will document the rationale for referral of individuals to short-term prevocational assistance and will establish a budget for purposes of payment to the pre-vocational assistance provider.

Costs for pre-vocational assistance shall not exceed $2000.00, and shall not exceed 6 months in duration with a maximum of 2 pre-vocational activities.

Payments will be made to vendors providing pre-vocational assistance at the rate charged to all individuals/organizations for the same service. Charges for specialized activities or materials shall be approved by the Workforce Development Director prior to obligating Title I funds. Participants may be reimbursed for supportive service costs as approved by Board policy.

Policy 15 Proprietary Schools

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 15

Proprietary Schools

Effective: November 14, 2000

Reviewed – no changes: April 24, 2014

Educational institutions that are not qualified to receive Title V Higher Education Assistance funding (Pell) or is not accredited or licensed through a nationally-recognized educational licensing Board shall be licensed as a Proprietary School through the State Proprietary Licensure Board prior to consideration for initial eligibility as a provider of training services.

Policy 16 5% Window for Youth

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 16

Effective Date: October 24, 2000

5% Window for Youth

Revision: February 18, 2009; May 21, 2014; May 18, 2016 (WIOA State Guidelines)

Section 129 of the Workforce Innovation and Opportunity Act allows services to be provided for non-economically disadvantaged youth, not to exceed 5% of the total youth enrollment level:

To be eligible for Workforce Innovation and Opportunity Act services through the 5% provision, youth ages 16-24, shall meet one of the criteria listed below and be approved by the Workforce Development Director:

1. An in-school youth

Or

2. An out-of-school youth who is either:
    a. A recipient of a secondary school diploma or its equivalent who is either basic skill deficient or an English language learner or requires additional assistance to complete an educational program or secure and hold employment.

Requires Additional Assistance includes any of the following factors:

- Has been fired from a job within 12 months prior to application
- No previous work experience/never held a job
- Has never held a full-time job (30+ hours per week) for more than 13 consecutive weeks
- Difficulty with social interaction or behavioral problems
- History of family disruptions, such as divorce, legally separated parents, family violence, alcohol or drug abuse, one or more parents incarcerated.
- Participating in an alternative program/setting
- Has chronic attendance or disciplinary problems
- Functioning at least one or more grade levels below his/her age group in the area of reading and math (age 18-24 – functioning at grade 11 or under)
- Has failed two or more subjects during the prior two years of school
- One of more parent lacks a high school diploma/GED

Policy 17 On the Job Training

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 17

On-the –Job Training Contracts

Effective Date: November 14, 2000

Revised Date: May 3, 2004; October 17, 2007; May 21, 2014; May 20, 2020; December 14, 2022

On-the-Job Training services will be available for out-of-school youth, adults, and dislocated workers who qualify for WIOA training services. Companies/businesses are eligible for OJT contracts based on the following:

1) Alignment with the TENCO Board approved sectors.
2) The company/business is the employer of record.
3) Employees with the same job title and/or job description for which an OJT applicant would be placed are not currently in a layoff status or on strike.
4) Current employees will not be partially or fully displaced as a result of the OJT.
5) The company/business has not relocated within 120 days causing dislocation of employees in the original location.
6) If previous OJT funds have been allocated to the company/business, performance of the contract will be reviewed prior to awarding WIOA funds; and
7) Availability of WIOA funding.

Training shall occur with an employer where employment opportunities exist. Current employees may receive services through an OJT if the training will lead to increased wages and/or advanced employment or the training alleviates the employee's risk of layoff. The OJT shall **only** be written if the employee will be trained in new technologies, new occupational techniques, or skills, or for the purpose of workplace literacy. The OJT participant may not be a family member of the potential employer, as defined in the Workforce Innovation and Opportunity Act.

Eligibility: All OJT participants shall be eligible following WIOA guidelines prior to starting the OJT. Each participant will complete an assessment to determine current skills, education, and employment history.

Length of Time: OJT contracts may be written for the length of time necessary for the employee to become sufficiently trained based on industry standards and/or employer recommendations but shall not exceed six (6) months in duration.

Training Plan: The employer shall develop a training plan for the participant in coordination with the participant and TENCO representative.

Reimbursement: The OJT employer will be reimbursed at the rate of 50% of the employee's wages or salary, not to exceed a pre-determined amount, for the purpose of covering the extraordinary cost of training.

Retaining Employee: Upon successful completion of the OJT contract, the employer is required to retain the employee at a wage or salary, benefits, and working conditions to that of similarly situated employees in the same organization. Employers exhibiting a pattern of failure to retain employees who successfully complete all OJT training as specified in the training plan risk losing further assistance through the OJT program. **Pattern of failure is defined as:** Employers retaining less than 50% of the employees placed in an OJT contract. An employee will not be calculated in the pattern of failure if the following occurs:

1) The employee did not complete the OJT training plan.

2) TENCO representatives were notified of concerns/deficiencies during the OJT, and/or

3) The employee violates the company/business policy and/or procedure.

Consideration will be given for changes in economic and/or industry conditions.

Wages: An OJT training contract may not be written for occupations offering an entry level wage less than $14.00 per hour.

Participants who are placed on an OJT contract may be eligible for incentives based on successful achievement of components within the training plan. Incentives are based on availability of funds.

Policy 18 Youth Individual referrals for occupational skills training

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 18

Youth Individual Referral for Occupational Skills Training

Effective: November 14, 2000

Reviewed – no changes: April 24, 2014

Youth, ages 16-24, may be referred for occupational skills training provided by an educational institution that has been approved as a vendor of occupational skills training services. Training shall be conducted in occupations shown to be in demand in the local area or an area in which the individual is willing to relocate and shall lead to self-sufficiency for the individual. The maximum amount specified for adult and dislocated worker services (policy number 7) applies.

The participant's individual service strategy shall include the need and rationale for approving occupational skills training, identification of the field of study and institution at which training will occur.

Policy 19 Student transfer of schools and programs 07.24.2025

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 19

Student Transfer of Schools and Programs

Effective Date: December 4, 2001

Revision: June 28, 2005; May 21, 2014; April 7, 2022; July 24, 2025

Participants enrolled in occupational skills training may complete a transfer of school and/or a program of study one time during enrollment (prior approval by the Career Counselor required) with the potential for continued assistance provided by TENCO Workforce Development Board. All program and school transfers must meet requirements, such as the program being an occupation identified on the Occupational Training List and the school being approved as an Eligible Training Provider. Career Counselors shall include the rationale supporting the transfer of school or program in the state approved database. Career Counselors shall identify the field of study or institution to which the participant is transferring, and an explanation of how the transfer will affect financial support provided by the Board (i.e. – extended enrollment period, etc.). The limitation of funding applies see policy #28. All funding is based upon the availability of funds.

Policy 20 Test Scores and GED as of 07.29.25

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 20

Participant Test Scores and GED

Effective Date: December 4, 2001

Revision: June 28, 2005; February 21, 2007; May 26, 2011; February 15, 2012; May 21, 2014; March 19, 2015; May 18, 2016; May 20, 2020; March 2, 2021; December 15, 2021; December 14, 2022; September 3, 2024; July 29, 2026

WIOA participants seeking funding assistance from the TENCO Workforce Development Area for a Certificate, Diploma, License, Associate Degree or higher must meet **one** of the following prior to receiving WIOA funds:

1. Score a **10th** grade level or higher in reading and math (Associate or higher degree).
   Score an **8.9** grade level or higher in reading and math (Certificate, Diploma, License programs) Test scores may be obtained from any reliable, standardized testing instrument which provides a grade level or equivalency, including: TABE, Compass, ACT and etc. The Assessment must have been completed within 3 years of the training approval.

   Or

2. Obtain the skill level identified as necessary to be successful in that occupation as

   provided by the NCRC or other comparable assessment.

   Or

3. Receive unconditional admittance into their program of study. (Passed Pre-Requisites and have official admittance letter)

   Or

4. Successfully completed post-secondary remedial classes in English and/or Math, as

   required by the training provider.

   Or

5. Earned the GED within the last three years.

   Or

6. Completed a minimum of 12 credit hours of post-secondary training within the last three years and demonstrated an overall 2.0 grade point average or higher. WIOA Counselors will take into consideration the types of classes taken, classes required for the intended program of study, and other criteria pertaining to training and employment goals prior to issuing funds. If enrolled in an Associate Degree program or higher, an English and Math class must have been successfully passed within the prior credits. WIOA Counselors will document their decision in the state's database.

   Or

7. Has an overall high school grade point average of a 2.0 or better. Graduation must have occurred within the last three years prior to eligibility determination and/or enrollment.

   Or

8. Been accepted into an Apprenticeship program.

Students requiring remediation will be referred for appropriate adult education or skills remediation assistance. TENCO will not cover any costs associated with the remediation course(s). Funding for non-remedial courses taken separately or in conjunction with remedial education is allowable.

Individuals, who do not have a high school diploma or GED, may be approved for funding assistance through TENCO WIOA for short-term, pre-vocational and/or programs that do not require a high school diploma/equivalency for enrollment. After an assessment, approval/denial will be determined on a case-by-case basis and conducted by the TENCO WIOA Director.

WIOA counselors will follow Policy #35 for instruction on providing intensive/training services to applicants who have a documented learning disability, where that learning disability has the potential of preventing the applicant from meeting the above-mentioned requirements.

Policy 21 Supplemental and Outcome Documentation 07.29.25

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 21

Supplemental Data and Outcomes Documentation

Effective Date: May 14, 2002

Revision Date: November 1, 2008; May 26, 2011; June 7, 2013; December 18, 2019; July 29, 2025

Reviewed – no changes: April 24, 2014

WIOA exit and follow-up forms provided to the TENCO WDB Administrative Staff shall be documented by one or more of the following items:

Documenting Performance:

A. **Unsubsidized Employment**
   1. Verbal or written contact and/or
   2. Paystub

All quarterly follow-up contacts must be documented in KEE Suite case notes and outcomes. At a minimum the information must include, **the date of hire, the employers name, employer's address and phone number and who provided the information.**

Note: For second and fourth quarter performance verification, attempts should be made to obtain two paystub per quarter from the customer.

B. **Attained Credential:**
   1. Copy of the credential or transcript;
   2. Documentation of a certification or license (can be the license number);
   3. Written verification from the training provider
   4. Documentation must be uploaded in the documents tab in KEE Suite, recorded in case notes and the outcomes tab. At a minimum the documentation must reflect the type of credential and the month/year earned.

C. **Youth Only - Entered Advanced Training/Post-Secondary Training:**
   1. School schedule;
   2. Verification (verbal or written) from the educational institution and/or WIOA provider.

Documentation should be uploaded in KEE Suite and recorded in case notes and outcomes. Verbal verification should be recorded in case notes and outcomes. At a minimum the case notes should include the name of the school, semester enrolled, program of study, and the contact information of who provided verbal verification.

D. **Qualified Apprentice**:
   1. Verbal or written documentation from school, business, trade union or supervisor identifying participant as an apprentice.

Documentation must be uploaded in KEE Suite and/or recorded in case notes and outcomes.

E. **Measurable Skills**:

Note: Pertains to any customer enrolled in occupational skills, secondary school, Adult Education seeking a GED, and/or on-the-job training.

- Credential (transcript or diploma/certificate/degree);
- Educational functioning levels (pre and post-test);

- High school diploma or GED;
- Sufficient number of credit hours (transcript or high school report card);
- Training milestone (OJT Training Plan or Apprenticeship Progress Report);
- Educational achievement (license – example CDL, Nursing, or certificate – example OSHA).

Documentation should be uploaded in KEE Suite and recorded in case notes and the Measurable Skills Tab.

Documenting Performance Exclusions:

A. Incarcerated (90 days or longer):

- Verbal or written documentation provided by the correctional institution or facility, partner agencies, participant or other reliable source;
- Newspaper or other public documents.

Documentation should be recorded in KEE Suite case notes. The documentation must include the name of the institution, date institutionalized, and length of sentence. A hard exit will be requested from Quality Control.

B. Health/Medical –

Note: Participant is receiving medical treatment (90 days or longer) that precludes entry into unsubsidized employment or continued participation in the program.

- Verbal or written documentation from the institution or facility, partner agencies, participant, or other reliable source.

Documentation should include the name of the treating doctor, identification of the medical condition which supports that the condition will continue for a minimum of 90 days documented in KEE Suite case notes. A hard exit will be requested from Quality Control.

C. Deceased:

- Verbal or written documentation provided by a reliable source;
- Public document (such as obituary)

Documentation should identify the participant and date of death. Record the information in KEE Suite case notes. A hard exit will be requested from Quality Control.

D. Youth – Foster Care

Note: Pertains to youth in foster care who have moved and no longer resides in the TENCO local area.

- Verbal or Written documentation from DCBS;
- Mail addressed to the youth.

Record information in KEE Suite case notes. A hard exit will be requested from Quality Control.

E. Active Duty – 90 days or longer,

- Military documents;
- Verbal or written verification from a recruiter/military personnel, partner agencies, participant, or other reliable source.

Documentation should be recorded in KEE Suite case notes and include the deployment date. A hard exit will be requested by Quality Control.

Policy 23 Not Attending School

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 23

Not Attending School

Effective Date: May 14, 2002

Reviewed- no changes: April 24, 2014

To document a youth's (ages 16-24) status in secondary school at the time of eligibility, a determination of attendance at school must be made. In the event a youth has not reported to school (secondary, alternative, or any other formally-recognized secondary school), for a period of 20 consecutive school days, the youth will be considered no longer attending the school he/she is enrolled. The youth or his/her guardian is not required to officially withdraw the student from the secondary school for consideration of "attendance at school".

Policy 24 Adult Priority

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 24

Adult Priority

Effective Date: May 14, 2002

Revised: February 11, 2003; May 21, 2014; August 19, 2015; May 18, 2016, February 8, 2021

The Workforce Innovation and Opportunity Act of 2014 specify that adult funds must be prioritized when providing funded Career and Training services. **Priority** of funded Individualized Career and Training services must be provided to individuals who meet the following criteria:

1. Recipients of public assistance defined as cash payments for which eligibility is determined by a needs or income test.
2. Low-income individuals, defined as has received (within past 6 months) or is receiving supplemental nutrition assistance (food stamps); receiving assistance through block grants for TANF programs under Title IV of the Social Security Act; receiving supplemental security income or is a family whose total family does not exceed the higher of the poverty line or 70% of the lower living standard income level; homeless; or an individual with a disability whose own income meets the income requirements above.
3. Adults who are basic skill deficient, defined as lacks a high school diploma/equivalency and is not enrolled in secondary education; scores 8.9 or below in reading and/or math; and/or Enrolled in ESL or has limited English Language skills.

Veterans/Spouses of Veterans continue to receive priority of service. However, program's eligibility and priority considerations must be made first, and then veteran's priority applied. Veterans must be honorably discharged to receive veteran's priority.

As part of the strategy to increase the level of individuals served that meets priority, the TENCO Workforce Development Board (WDB) staff will provide information regarding program services to agencies that specifically target the identified priority populations. Agency representatives will be informed of TENCO WDB meetings and requested to serve on committees of the TENCO WDB. Agency representatives will be included in Career Center Partner meetings to learn about services available in the local area.

The TENCO WDB will continue to serve the working poor, as defined in policy 10, Self Sufficiency. If multiple applications are received simultaneously, those meeting priority at time of eligibility AND meets all other Federal, State, and local policy/procedure will be provided first opportunity for funded Individualized Career and Training services.

Exceptions to priority requirements include:

1. When funds other than adult formula funds are utilized;
2. Incumbent Worker Training.

TENCO WDB will maintain a database of all enrolled individuals, which will identify participant's inclusion in a priority category. TENCO WDB recognizes the policy as disseminated by the State Office of Employment and Training which identifies that 50.1% or more of adult participants are expected to be enrolled in one or more of the three priority categories identified in the WIOA. TENCO WDB staff will report quarterly on the number/percentage of participants who meet the priority category (ies).

Policy 27 Equal Opportunity 07.24.2025

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 27

Effective Date: November 12, 2002

Equal Opportunity Policy

Revised: February 18, 2009; April 8, 2012; December 18, 2019

Reviewed-no changes: April 24,2014

TENCO Workforce Development Board will offer all individuals an opportunity to apply for eligibility for Title I Workforce Innovation and Opportunity Act services as authorized under Public Law 113-128 and its governing Regulations. TENCO further agrees to ensure that all individuals eligible to receive services pursuant to Title I of the Workforce Innovation and Opportunity Act of2014 will be provided equal access to services in compliance with Non-Discrimination Laws (Executive Order NO. 11246), The Rehabilitation Act of 1973, and the American's with Disabilities Act of 1990.

However, enrollment into services is not an entitlement and is contingent upon the results of an objective assessment, availability of funding, and authorization of program activities. TENCO WDA staff and sub-contractors will be cognizant of equal access laws, Acts and Regulations when providing basic and individualized services, training services and case management. All TENCO WDB staff, sub-contractors, and Career Center staff will attend EO training annually. The TENCO Career Center Operator will maintain staff attendance records. WIOA funded contracts will be monitored annually for compliance.

If a discrimination complaint is filed with the local EO Officer, correspondence in the form of a written Notice of Final Action must be provided to the individual within 90 days of the original date in which complaint was filed. Complaints of discrimination are retained for a period of no less than three (3) years after resolution.

Applicants and/or participants of WIOA services who file a grievance based on Equal Opportunity (EO) discrimination will follow the process outlined in the EO Procedures provided to all WIOA applicants.

1. The Quality Control Specialist will analyze customer data annually, at a minimum. The EO Officer and Workforce Development Director will be notified in the event the analysis results indicate a pattern of discriminatory practices.
2. The EO Officer will conduct an investigation to determine if discriminatory practices exist and take immediate action for resolution. Further legal or regulatory actions will be conducted as required by Law.

Policy 28 Training Limitations Draft 07.29.25

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 28

Training Limitations

Effective:06-16-03

Revision: June 28, 2005; February 18, 2009; May 16, 2012; March 2, 2021; May 21, 2025; July 29, 2025

Reviewed – no changes: April 24, 2014

Participants seeking assistance from the TENCO Workforce Development Board may receive funding per training for a maximum of two years for an Associate program or four years for a Bachelor program. Participants may be eligible for more than one training opportunity ***if*** all policies and criteria are met.

Exceptions for participants exceeding the maximum years of funding will be considered for the following reasons:

- A program of study that requires pre-requisite courses. Pre-requisites may increase the length of time necessary to complete a training program. Funding for pre-requisites is allowable.
- Additional credit hours are required to successfully complete the approved training program. The participant must have enrolled in WIOA with the ability to complete within their specified timeframe (above) appropriate for their training. Successful completion is defined as: Attainment of a credential "diploma, degree, certificate or license". Career Counselors must request and provide justification for additional funding if the individual is unable to complete within their specified timeframe. Workforce Administrative staff will review each case and provide the Career Counselor with a determination for additional funding. Approval is required prior to obligating additional funds. All obligations and extension of obligations are based on the availability of funds.

Policy 29 Invoicing

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 29

Invoicing and Support Requests

Effective Date: July 1, 2004

Revision Date: June 28, 2005; May 21, 2014

WDA contractors, WDA participants, and WDA vendors requesting funds from TENCO Workforce Development Area for services shall invoice within 30 days of the month in which costs occurred. Failure to produce timely invoicing may result in denial of payment and/or de-obligation of funds.

Invoices for services occurring in June must be submitted within 15 days due to the fiscal year ending June 30th.

Policy 30 Continuation of Funds 7.24.2025

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 30

Continuation of Funds

Effective Date: May 3, 2004

Revision Date: June 28, 2005; June 1, 2006; February 18, 2009; March 19, 2015; May 18, 2016; February 8, 2021; May 21, 2025

Reviewed – no changes: April 24, 2014

WIOA training funds may be available to eligible WIOA participants attending an approved training program. Continuation of funds will depend on the following criteria.

- Participants are expected to be full time students throughout the entirety of each semester. However, TENCO will allow participants to go below full-time status for one semester without penalty. This allowance is only for participants who have initially taken a full schedule of classes, but due to unforeseen circumstances, needed to withdraw from one or more class. The participant must still meet the criteria listed below. A second semester where a withdraw results in less than full time status will result in WIOA funds being withheld for the following semester. Full time is defined by the post-secondary institution. *An exception may be granted if only a minimal number of courses are available. Summer and interim sessions are excluded from this requirement.*
- Participants who withdraw or fail a class(es) must be able to complete their training program within their approved timeframe or receive approval through the Assistant Director for a modification to their training plan. (Policy 28).
- The Federal Financial Aid Forms must be completed each academic year, if applicable.
- Maintain monthly contact with Career Counselors.
- Continuation of the training plan as agreed upon by participants and Career Counselor.
- Contingent upon satisfactory performance in training (2.0 Grade Point Average per semester/quarter). If a student falls below a 2.0 GPA, the next semester/quarter is not approved for training funds. Supportive services may be approved. Courses not funded by WIOA that are used to raise the GPA must be relevant and/or required for the participant's course of study.
  Note: A participant who receives TRA (Trade) and is determined ineligible for continuation of WIOA training funds may also lose their TRA benefits.
- Participants attending pre-vocational and/or occupational skills training who fail or withdraw from a class may receive funding approval for no more than ***one*** repeated class. Funding for additional failed or withdrawn classes will be the responsibility of the participant. Out-of-pocket expenses for TRA participants may result in loss of TRA benefits.
- Providing falsified information or misrepresenting costs will result in denial of WIOA training funds for the following quarter/semester or removal from the WIOA program.
- Training is based on the availability of funds.

Policy 31 Eligible Training Provider Application

TENCO WORKFORCE DEVELOPMENT BOARD

Eligible Training Provider Application

Policy No. 31

Effective Date: May 3, 2004

Revision Date: December 7, 2004; October 23, 2009; May 18, 2016

Reviewed – no changes: April 24, 2014

Local Training Provider List

TENCO Workforce Development Board staff will review and approve all TENCO WIOA eligible training programs. Approval will be based on sectors and occupational training approved through the TENCO Workforce Development Board.

Policy 32 Sector Identification Occupational Training List

Policy No. 32

Sector Identification/Occupational Training List

Effective Date: May 3, 2004

Revision: February 20, 2008; December 16, 2009; May 26, 2011; February 19, 2014; May 18, 2016; February 8, 2021; December 21, 2022

The TENCO Workforce Development Board may utilize the following data sources to identify high-wage, high-demand sectors and occupations within the ten-county area.

- Real time data from local businesses,
- Labor market surveys,
- FIVCO and Gateway/BTADD Occupational Outlook publication,
- Internet research and databases,
- Data based on TENCO performance outcomes.

The above-mentioned data sources will assist in the development of the TENCO Occupational Training List. TENCO funds for occupational skills training may only be allocated for occupations identified on the Occupational Training List. The identified occupations will also be given priority for On-the-Job-Training funds.

<u>Criteria for inclusion on the Occupational Training List:</u>

- Must be in a targeted sector.
- Offers an average wage of $14.00 or more per hour or is a tier in a career ladder leading to an occupation with an average wage of $14.00 or more per hour.

<u>Other criteria considered:</u>

- Past TENCO performance shows a 50% or higher entered employment in field of study (requires three (3) or more individuals in the performance data).
- Occupations have a high projection of employment (5 or more annual openings) within our workforce area.
- Or the Occupation is determined through data collection to be an occupation that will grow and develop the local area.

Sectors and occupations will be reviewed annually.

The Strategic Planning Committee will recommend the Sector/Occupational Training List to the TENCO Workforce Development Board. The Board has the right to add, continue, delete, and/or restrict occupations on the list.

The Board may modify sectors/occupations within the Occupational Training List throughout the year, based upon changing economic conditions. The TENCO Workforce Development Board will approve all additions and/or deletions from the Occupational Training List.

Policy 33 Calculation of Unmet Need

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 33

Calculation of Unmet Need

Effective Date: June 21, 2004

Revision Date: June 28, 2005; August 21, 2019

Reviewed- no changes: April 24, 2014

TENCO WDA staff shall review and document the Cost of Attendance (COA) for WIOA participants attending post-secondary education. Eligibility for WIOA training funds shall be established by reducing the COA by the participant's grants, scholarships, and subsidized aid (Vocational Rehabilitation, Community Action Programs, etc.) to determine unmet need. Cost of Attendance and unmet need will be calculated each academic year. WIOA training funds cannot exceed the unmet need of each individual, and/or the amount approved by the TENCO Workforce Development Board.

Policy 34 Need To Train 07.29.2025

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 34

Need to Train

Effective Date: June 21, 2004; June 28, 2005; January 1, 2006; August 27, 2008

Revision Date: February 18, 2009; May 21, 2014; August 19, 2015, June 21, 2016; August 21, 2019; February 8, 2021; Revision December 14, 2022; July 29, 2025

Adult, Dislocated Worker, and Youth applicants must meet the following criteria to be considered for occupational training funds.

1. The individual has completed an interview, evaluation, and/or assessment and has been determined to be unable to obtain or retain self-sustaining employment through basic career services.
2. The individual has met the following six criteria as established through the State "Need to Train" policy.
    a. Is suitable employment available?
    b. Are the appropriate trainings beneficial?
    c. Is there a reasonable expectation for employment following training?
    d. Is the training reasonably available?
    e. Is the training available at a reasonable cost?
    f. Is the customer qualified to undertake and complete the training?
3. The individual meets local policy # 20, Test Scores and GED.
4. The occupation in which training is requested is an Occupation in Demand in the TENCO local area or in the area that the individual is willing to relocate.
5. Training is available at or below a reasonable cost, defined as the highest cost of attendance for a public college or university located within the TENCO region.
   NOTE: Trade participants must have 100% of their tuition, books, and supply needs paid by an outside source which includes Trade training, WIOA, Vocational Rehabilitation, Grants, Scholarships, Veterans, etc.
6. Training should be completed within two years for an Associate program or four years for a Bachelor program. An exception may be made following policy number 28 – Training Limitations. If an exception is considered for a Trade participant who is still receiving TRA benefits, costs must come from WIOA or other sources at 100%. If the participant has exhausted TRA benefits, WDA policies apply.
7. The need to train criteria has been documented in the state approved data base.
8. Individuals who possess a post-secondary credential (certificate, diploma, license, or degree, unless intentionally earned as a pre-requisite for an advanced training program) in an occupation in demand as defined by the TENCO WDB will not be eligible for occupational skills training funds unless the following has been documented:
    a. The customer is unable to work in the specified field due to circumstances such as, but not limited to health, changes in childcare needs, job stability, hours available for work, pay, and benefits.
    b. The Workforce Counselor can document the credential is outdated.
    c. The customer identifies a career pathway within their field of study, which requires additional training to secure a higher level of employment in a high –demand occupation with the TENCO Sectors. Policy # 39

Individuals who have a marketable skill, but are already enrolled in a training program, must still justify their need for training prior to receiving a WIOA scholarship.

Policy 35 Disabilities

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 35

Disabilities

Effective Date: February 15, 2012

Reviewed – no changes: April 24, 2014

TENCO Workforce Development Board will offer all individuals an opportunity to apply for eligibility for Title I Workforce Innovation and Opportunity Act services as authorized under Public Law 113-128 and its governing Regulations. TENCO further agrees to ensure that all individuals eligible to receive services pursuant to Title I of the Workforce Innovation and Opportunity Act of 2014 will be provided equal access to services in compliance with Non-Discrimination Laws (Executive Order NO. 11246), The Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990. However, enrollment into services is not an entitlement and is contingent upon the results of an objective assessment, availability of funding, and authorization of program activities.

The goal of the Workforce Innovation and Opportunity Act is for individuals to locate self-sustaining employment. All WIOA Title I applicants must be evaluated to determine they are qualified to undertake and complete training leading to self-sustaining employment, prior to being enrolled in a training service.

Workforce Title I applicants with a documented disability (s) will provide the Career Counselor with an assessment/evaluation and identification of necessary accommodations by an entity with expertise in disabilities, to determine potential success in reaching the applicant's training and employment goals. Applicants who do not have an assessment/evaluation completed will be referred to an entity such as, Office of Vocational Rehabilitation, Office of the Blind, Comprehend Inc., Pathways, etc., in order to receive an assessment/evaluation. The TENCO Workforce Career Counselor will utilize the assessment/evaluation provided by the entity in coordination with any assessment/interview conducted by other reliable sources, including WDA representatives, to determine enrollment in WDA individualized and/or training services. Basic career services are available to all applicants and may be provided directly through the Career Centers or referred to outside agencies.

Applicants with a documented learning disability (s) may be exempt from TENCO's required grade level (Policy #20) if all evaluations/assessments indicate the applicant is qualified to undertake and complete the training and become employed in their specified field of study. A grade level must still be obtained by WDA Counselors, for data reporting purposes.

TENCO WDA staff will be provided ADA training, and will be cognizant of equal access laws, Acts and Regulations when providing core, intensive and/or training services.

All individuals who apply for WIOA services but are not enrolled in individualized and/or training services have the right to appeal the decision by following the TENCO Grievance Procedure. All WIOA applicants shall receive a copy of the Grievance Procedure at time of application and/or eligibility determination.

Policy 36 Incumbent Worker Training

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 36

Incumbent Worker Training

Effective Date: December 16, 2015

Incumbent Worker training is a business service designed to avert layoff and/or to increase the competitiveness of the employee and the employer in the local area by developing and retaining a skilled workforce. A maximum of twenty percent (20%) of Adult and/or Dislocated Worker funds may be utilized to provide incumbent worker training. Additional training funds may be available through Statewide Rapid Response.

Eligibility for Business:

- The business must be established (defined as six months or more) before submitting an application for incumbent worker training funds.
- The business must be an in-demand occupation as defined through local, regional, and/or State sectors.
- An application documenting their need for training must be submitted and approved.
- The business is located in the TENCO workforce area or the East Region. Exceptions may be made if the business is located outside of the local/regional area and a minimum of 25% of their workforce are TENCO residents. This exception would require a partnership between the workforce area in which the business is located.
- The employment positions in which training is provided shall meet a minimum of 80% of the self-sufficient wage as determined by Board policy.
- Maximum cost per application: $50,000.00 for training up to six months; $100,000.00 for training six months - one year; $200,000.00 for training that exceeds one year. All funding is dependent upon availability of funds.
- The employer must commit to retaining the employee for a minimum of one year unless the employee voluntarily leaves the business, and/or is terminated due to violating policy and procedures of the business.

Businesses are expected to contribute to the skill attainment of their workforce. TENCO will utilize the following chart to determine the amount of the employer contribution for the overall costs of the training.

Number of Employees Employer Contribution

50 or less	**10% of the cost of the contract**
51 - 100	25% of the cost of the contract
More than 100	50% of the cost of the contract

Business contribution may be cash funds available for training and/or in-kind. Allowable in-kind contributions include, but is not limited to: salary of staff while overseeing the project, direct employee wages while attending training, items/supplies purchased to assist the individuals with training needs, and training space (business must show calculation).

Eligibility for Participants:

- The incumbent worker must have been employed for a minimum of six months with the employer (must be off probation).
- The incumbent worker cannot be a temporary employee.

- Individuals utilizing Adult/DW funds must be at least eighteen (18) years of age and meet citizenship requirements.
- Incumbent workers are not required to meet income, self-sufficiency, and/or priority requirements as eligibility criteria for training, as the purpose of the training is to ensure retention of employment.

Training:

Training may be short and/or long term (2 years) based on the business need. Training that includes a nationally recognized credential must be conducted by an institution identified on the State Eligible Training Provider List. Training that does not provide a nationally recognized credential must receive prior approval through TENCO. Although obtaining a nationally recognized credential is encouraged, it is not a requirement as some training may be short-term, and/or business specific, and not meet the requirements of a nationally recognized training component. Training may be provided on-site, at the training institution, online, through distance learning, or a combination of these methods. Training hours must be documented and reported by the business to TENCO.

Reporting:

Data on individuals participating in the incumbent worker training must be collected and entered into the data system utilized by TENCO. Monthly Case Management is required. Files will include eligibility documentation, training schedule, grades (if applicable), credential (if applicable), participant training plan, and follow-up/performance documentation. An incumbent worker file must be maintained with the application for funds, approval of the application, certified participant roster, participant training plans, description of the training to be provided, invoices/payments, and post-training evaluation.

Allowable Expenditures:

Federal funds utilized for incumbent worker training may pay the cost of training, fees, books, supplies, and testing. Supporting documentation must be submitted with invoicing when reimbursement for the above-mentioned items is requested by the business. Mileage and child care reimbursement for training is only available if the training is off-site from the participant's place of employment and/or requires the participant to be present during times other than their regularly scheduled workday.

Invoicing:

The incumbent worker contract is a cost-reimbursement contract. Invoices for total costs of the program are expected on a monthly basis. Reimbursement will be based on the request, documentation supporting the request, and allowable amount as determined in this policy.

Performance:

The business is expected to retain the employee for a minimum of twelve months unless the employee voluntarily leaves the business and/or the employee violates policy/procedure of the business. Quarterly documentation from the employer will be expected.

- Ninety (90%) of the employees participating in the incumbent worker training will be retained for a minimum of twelve months upon completion of their training.
- Timely and accurate invoicing. Invoicing should be completed by the 15th of the month following the month in which funds are being requested. Invoicing shall consistently (defined as 80%) meet the reporting deadline.
- Ninety (90%) of employees attending the training will successfully complete the agreed upon training plan.
- If enrolling in a training that provides a nationally recognized credential, 90% will achieve the credential.

Although not an established performance measure for lay-off aversion, businesses will be asked to report wage increases and promotion of employees who successfully completed the training program. This will be reported six (6) months after successful completion of training.

Policy 37 Limited English Proficiency

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 37

Limited English Proficiency

Effective Date: 12/16/2015

Revision: 8/21/19

TENCO Workforce Development Board will have resources including written and verbal translation for customers with limited English proficiency. Limited English Proficiency is defined as individuals who do not speak English as their primary language and/or who have a limited ability to read, write, speak and/or understand English to function adequately in employment and/or society.

Limited English Proficiency may be determined by the following methods:

- **A.** Counselor observation of an individual from a nationality other than the United States having difficulty in speaking and/or completing documents;
- **B.** Request from the individual for an interpreter; and/or
- **C.** Individual that identifies their nationality as other than the United States and scores basic skill deficient on a standardized test.

TENCO WDB will adopt the Limited English Proficiency Plan developed by the Career Development Office and issued on 11/25/14. All modifications to the plan will be reviewed and adopted as necessary to ensure timely and quality language assistance services are available to customers.

Policy 38 Layoff Aversion

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 38

Layoff Aversion

Effective: 12/14/20

Revision: 12/14/22

The TENCO Workforce Development Area supports businesses who are attempting to avert layoff and/or closure through training/re-training/upgrading skills of their current employees. Layoff aversion is an early intervention business service that can assist a company with preparing for and managing economic transition and related workforce challenges. Incumbent worker dollars, training dollars, and OJT dollars may be utilized to assist companies with their need while in this transition. The following guidelines will be effective when WIOA funds are utilized to train/re-train/upgrade skills and/or serve affected business and/or individuals.

- Eligible businesses must provide a wage of $9.00 or more per hour for the position where layoff aversion is being requested;
- Eligible businesses must be in a sector approved by the TENCO WDB;
- Individuals must be full time employees of the company requesting layoff aversion services;
- Individuals are expected to earn an industry defined marketable skill, credential, and/or wage gain as a result of their training;
- Individuals cannot receive a reduced wage from their current job;
- Individuals are not required to meet the self-sufficiency policy of $14.00 per hour as the goal of this program is to avert a pending layoff;
- OJT, Incumbent Worker, and Training dollars may be combined or used separately to support the business seeking layoff aversion services;
- Individuals enrolled in training as part of the layoff aversion must meet all eligibility criteria as established per funding source and through Federal, State, and local guidance;
- Training providers for incumbent worker training and/or OJT are not required to be on the Eligible Training Provider List. However, if occupational skill training is funded as a result of layoff aversion, the training provider must be an eligible provider as defined by OET.
- Occupational skills training may not exceed two years in duration;
- The business must be located in the TENCO Workforce Development local area, and must be operational in the area for a minimum of 6 months to be eligible for funded layoff aversion services;
- The business must agree to retain the employee for one year unless the employee violates standards as set by the business.

Policy 39 Career Pathways 5.21.25

TENCO Workforce Development Board

Policy Number: 39

Career Pathways

Effective Date: 12/14/16

Revision Date: 5/20/ 2020; 8/2023; 5/21/2025

The TENCO WDB may utilize up to a maximum of $100,000.00 per fiscal year of adult/dislocated worker funds to assist individuals who are employed at a wage above self-sufficiency (see policy) and/or already have a nationally recognized credential with obtaining training that will lead to career advancement through an identified career pathway. The outcome of the career pathway must result in the following:

1. A nationally or industry recognized credential in the occupations deemed in demand in the local area.
2. Career pathways must lead to a wage increase as documented by the individual's employer or through the KY Stats Entry Level Wage Report for the TENCO area.

Individuals participating in Career Pathways projects must meet the eligibility criteria as established by Federal and State guidelines. Individuals participating in a Career Pathways project are not required to meet the local priority or self-sufficiency policy for eligibility purposes. However, individuals with a current marketable skill (occupational credential) in a high-demand occupation as approved by the TENCO Workforce Development Board shall only be approved for occupational training funds as it relates to a Career Pathway if:

1. He/she has been employed in their field of study for one year or more; and
2. Has not received WIOA funding during the past year; and
3. If WIOA funding was awarded for prior training, the customer's record reflects positive performance; and
4. Data shows a wage increase of 10% or higher.

This policy will provide opportunity to improve community conditions by filling the skill gaps identified by stakeholders, increase advancement and wage opportunities for individuals and families in the community, and increase the availability of entry level positions in high demand career fields.

This policy is designed to increase the credential and earnings potential for individuals by supporting training for career pathways **within** a high-demand sector.

Examples of Career Pathways include:

Health Care: C.N.A →LPN→RN→PA or NP

Manufacturing: Engineering Tech → Engineer

Manufacturing: Machinist → Advanced Manufacturing

Business: Bookkeeper - Accountant

Policy 40 - GED Policy

TENCO Workforce Development Board

Policy Number: 40

GED

Effective Date: 12/14/16

The TENCO WDB recognizes the importance of GED attainment as it provides a pathway for employment and advanced training. As allowable under the Workforce Innovation and Opportunity Act, the board may authorize funds to assist in training costs, including supplies such as testing.

The TENCO WDB authorizes funds be made available to assist with the cost of the GED testing fees for individuals who meet the following criteria:

- Is a resident of the TENCO local area;
- Meets all eligibility criteria as established by the Federal, State, and local board;
- Has been determined test ready as documented through Adult Education and Literacy;
- Has completed a job readiness curriculum (if goal is immediate employment) which at a minimum includes attending a Career Center Orientation of services, registering in Focus Career, completing a usable resume/application as approved through Career Center staff and completing the Kentucky Essential Skills program; And
- Completed an assessment and plan of action toward immediate employment and/or post-secondary training in a sector/occupation determined to be in high-demand by the TENCO WDB.

Testing fees may be paid for all sections of the GED for a maximum of two attempts per section.

Individuals participating in GED attainment and seeking WIOA assistance with post-secondary expenses (such as participants in Accelerated Opportunities) must follow all Federal, State, and local guidelines.

Policy 41 Event Conference Reasonable Cost Policy

TENCO Workforce Development Board

Policy Number: 41

Event Conference Reasonable Cost Policy

Effective Date: May 15, 20193

Revision Date: October 7, 2019

The TENCO Workforce Development Board allows for event/conference costs when the costs are reasonable and necessary to disseminate technical information in order to achieve board goals, meet standards, and/or improve the service/program outcomes.

Meals may be provided during events/conferences where the majority {51%) of attendees include non-board staff, and the expectation that the event will last 2 or more hours.

The total cost of a meal for a regularly scheduled event which occurs multiple times within the year which includes food and beverages shall not exceed the federal per diem per person (see attached). These calculations will be based on the total amount of the invoice divided by the total number reserved. All parties attending the event/activitymay participate in the meal, regardless of board membership status. A meal may consist of breakfast, lunch, or dinner as events take place based on a flexible and accommodating schedule. Gratuity is included in the allowable cost

An exception to using the federal per diem rate is allowable for Annual and/or Special Events/Conferences with SO or more invitees (excluding board/contract staff). The TENCO WDB will use the following criteria for these events to determine reasonableness:

1. Location of the event requires a specific catering service;
2. The meal is not specially designed or altered from the menu; and
3. The Executive Committee or Workforce Development Board approves the budget for the meal.

If the location of the event does not require a specific catering service, three quotes will be

received from local providers. The location of the TENCO Annual meeting is on a rotation schedule. Therefore, quotes for catering services will be specific to the location of the event based on the rotation.

A conference is defined as a meeting, retreat, seminar, symposium, workshop or event whose primary purpose is the dissemination of technical information beyond the non-Federal entity and is necessary and reasonable for successful performance under the Federal award. In addition, TENCO WDB considers it reasonable that a conference that exceeds five hours may result in multiple meals, refreshments, and/or beverages. Food, refreshments, and beverages for conference type events shall not exceed the.federal per diem per person per day (see attached).

Costs associated with rental of space, which includes but is not limited to set-up/break-down, and/or use of equipment, is not included in the calculations for reasonable food allowances at events/conferences. These costs are allowable and will be considered a reasonable cost when the space is $599.00 or less.

If the cost is in excess of $599.00 the Administrative Entity for the TENCO Workforce Development Board must justify the cost through a cost analysis of the area prior to approval. The cost analysis shall be relevant based on the TENCO WDB By-Laws specifying location of events (if applicable}, accessibility, adequate space to meet the goal of the event, and adequate equipment/technical accessories. The space which costs the least amount of federal funds will be utilized when all other factors are met.

TENCO WDB will exercise discretion and good judgment in ensuring that event and/or conference costs are appropriate, necessary and managed in a manner that minimizes costs to the Federal award. Costs associated with entertainment are unallowable, except where specific costs have a programmatic purpose and are authorized in the budget for the Federal award or with priorwritten approval of the Federal awarding agency.

Policy 42 Incentive Policy

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 42

Youth Incentive Policy

Effective Date: 8/21/19

Revised: December 18, 2019

In-School and Out-of-School Youth served through the TENCO Workforce Development Board are eligible for outcome-based incentives. **Examples** of criteria where incentives may be utilized include:

1. GED completion;
2. High School completion;
3. Successful completion of work experience hours;
4. Successful evaluation of work-based learning project;
5. Completion of workshops;
6. Work ethic skills certificate obtainment; and/or
7. Occupational skills credential obtainment.

"Success" is defined in each contract that is approved by the TENCO Workforce Development Board.

Youth providers will specify the criteria for incentives in their proposal of services. The board staff may approve criteria not listed above if the incentive plan is detailed, and the criteria is outcome-based, measurable, and reflects the goals of the WIOA. Incentives shall be directly related to achievement of employment and/or educational goals

Incentives may not exceed $100.00 per criteria outcome, per fiscal year. Youth may be eligible for more than one incentive dependent upon their goals and objectives.

Although youth may seek and be eligible for multiple occupational skills credentials, **youth may only be eligible for an incentive for one occupational skills credential.** Credentials may be certificates, diplomas, licenses, and degrees.

Youth who are enrolled outside of the youth contracts will be eligible for incentives through the WIOA based on the examples provided above.

Sub-contractors may not use incentive funds for items of entertainment.

Policy 43 Eligibility

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 43

Eligibility

Effective Date: 8/21/2019

The TENCO Workforce Development Board will follow guidance established by the Education and Labor Cabinet to determine eligibility for adult, dislocated worker, and youth customers. Guidance includes completion of WIOA electronic records and uploading required supporting documentation specific for each population. The TENCO Workforce Development Board has the authority to determine additional eligibility criteria for specific populations, projects, and programs. Any additional criteria established will be approved as policy by the TENCO WDB.

Policy 44 - Records Retention

TENCO WORKFORCE DEVELOPMENT BOARD

Policy Number: 44

Records Retention

Effective Date: 12/18/2019

The TENCO Workforce Development Board agrees to maintain all customer, financial, procurement, and contractual records, including supporting documentation, for a period of three years from the date of the final expenditure report. Sub-contracts with the TENCO WDB will follow the same record retention policy. All records must be maintained until all litigation, claims, or audit findings involving the records have been resolved and final action has been taken. 2CFR200.333

Policy 45 Workforce Development Board Staff

Policy Number: 45

Workforce Development Board Staff

Effective Date: December 15, 2021

The Workforce Innovation and Opportunity, Regulations 679.400, states the local WDBs have the authority to hire a director and other staff to assist in carrying out the functions of the local WDB. The Department of Workforce Investment, under the Education and Workforce Development Cabinet, has issued policy 17-001 {20), to further require that the Workforce Development Board is the only entity that may hire the Workforce Director and/or board staff. The WDB may select an entity to serve as the employer of record for WDB staff.

The following guidelines provide clarification of the role and responsibility of the TENCO WDB in the hiring of board staff, including the Director.

A. Upon a vacancy or announcement of an upcoming vacancy of the local Workforce Development Director position, the TENCO WDB Chair in coordination with the Executive Director of the Administrative Entity/Employer of Record shall develop and post the job description, location of employment, required/preferred educational experience, and any other desired qualifications.
B. The officers of the TENCO WDB shall participate in the selection of candidates to interview from resumes determined by the Executive Director of the Administrative Entity/Employer of Record as meeting agreed upon qualifications.
C. A joint Ad Hoc committee shall review candidates selected for consideration. The review, which may include multiple interviews, shall include five members. Representation in the Ad Hoc Committee shall include the TENCO WDB Chairperson, a member of the Executive Committee of the WDB, the CLEO for the WDB, the Executive Director of the Administrative Entity/Employer of Record, and an individual selected by the TENCO WDB Chair which may include partner agency representation, board members, committee members, Judge/Executives, or other interested parties.
D. The Chair of the WDB and Executive Director of the Administrative Entity shall present the selected candidate to the oversight board for the Administrative Entity, if applicable, for input prior to making a job offer.
E. The Chair of the WDB shall require an annual (at a minimum) evaluation of all workforce staff. The Chair of the WDB shall review and sign the evaluation before it is official.
F. The Executive Director of the Administrative Entity/Employer of Record may terminate WIOA staff with the agreement of the TENCO WDB Officers.
G. No other entity shall hinder or attempt to hinder the TENCO Workforce Development Board from fulfilling its obligations as defined by the WIOA Law, Regulations, and public statute.

Policy 46 Case Note & Data Entry Policy 7.9

TENCO Workforce Development Board

Policy Number: 46

Case Note & Data Entry

Effective Date: December 15, 2021; August 31, 2023; July 9, 2025

Career Counselors shall ensure that data and required documentation for individuals participating in the WIOA Title I programs are entered timely, accurately, and adequately into the statewide data system. Record completion should include all mandated sections as well as the customer's goals, strengths, obstacles (if applicable), assessments, and financial aid information (if applicable) to reflect a holistic training plan. If the customer enrolls in a training service, the criteria to train must be completed detailing the results from the assessments utilized to justify that training is necessary for the individual to secure self-sustaining employment. Timeliness for data entry shall follow the Education and Labor Cabinet policy.

A case note must be included that provides information on the orientation of services available to the customer, family dynamics, geographical location, work history, strengths, obstacles, educational experience, goals, priority status (adult only), and other information relevant to the initial intake.

Case notes should be entered when services, activities and/or contact is made with the customer and/or on behalf of the customer. Case notes should be relevant to the customer's training plan, services enrolled, and the desired employment and/or educational outcome. Monthly contact is required and if not obtained, a case note detailing the attempts to contact should be included. Timeliness for case note entry shall follow the Education and Labor Cabinet policy.

Case notes should be entered monthly (at minimum). The following are specific examples (not all inclusive) of when case notes should be entered:

The customer is enrolled in a service or element, the service/element has been modified, and/or the service/element has ended. The case note should provide details of the enrollment, modification, and/or closure of the service/element.

The Career Counselor has submitted an exit request. The case note must include why the exit request has been submitted (obtained employment, cannot locate, entered military, etc.).

The Career Counselor should note when a customer has completed services but will remain in case management/job search. Case management/Job Search should not last longer than 90 days without being evaluated and must include active service delivery documented in case notes.

Case notes should be included when an error in KEE Suite prevents the Career Counselor from following policy and/or completing the customer's record.

Case notes should be included when a customer is attending a school and/or training program that is not eligible for financial aid, and/or does not produce schedules, grades, cost of attendance, etc.

Anytime a customer is included in an exception or exemption of a policy or eligibility. Examples would include youth being served under the 5% rule, a customer falling below 12 credit hours, a customer who was approved for additional funds, and/or has been approved for an additional semester of training or work experience hours (youth).

When an outcome is being recorded. Data to support the employment and/or school status should be noted. If the customer is still seeking employment, the case note should specify what was done to link the customer with current employment opportunities.

Policy 47 Assessment Policy 09032024

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 47

Assessments

Effective Date: 6/13/24

WIOA requires an objective assessment, evaluation, and/or interview with each Adult, Dislocated Worker, and Youth customer to be completed prior to enrollment in WIOA services. **This includes a review of basic/academic skills, occupational skills, educational history, work history, employability skills, interests, and barriers to employment**.

The assessment process may include the use of multiple methods and tools while the individual is enrolled in WIOA. The ongoing assessment process must support engagement of the individual and ensure that the Individual Employment Plan supports training (youth) and/or employment outcomes.

Assessment results must be recorded in the State authorized case management/data system. Information recorded includes but is not limited to the type of assessment used, name of assessment (if applicable), and results of assessment.

Staff may use a variety of assessment tools to inform service delivery.

Academic Assessments

Academic assessments determine a participant's basic skills needs. Academic assessments conducted prior to or as part of WIOA engagement may be utilized.

- **TENCO WDB Local Area Definition of Basic Skill Deficient**

A youth, adult, and dislocated worker may be considered "basic skill deficient" if they cannot 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. Unless specifically identified in a contract, Career Counselor's may use the following to determine basic skill deficiency.

- High School Drop Out. **At time of eligibility/enrollment.**
- High school graduate, including alternative secondary school, with a cumulative GPA below 2.0. **Documentation three years prior to eligibility determination and/or enrollment will be accepted.**
- Post-secondary graduate with a cumulative GPA below 2.0. **Documentation three years prior to eligibility determination and/or enrollment will be accepted.**
- Enrolled in high school or post-secondary school with a **current** cumulative GPA of 2.0 or below.
- Scores at or below an 8.9 grade level in reading and/or math on a valid reliable standardized testing instrument, such as but not limited to the TABE. **Documentation three years prior to eligibility determination and/or enrollment will be accepted.**
- Scores 17 or below on the Reading and/or Math portion of the ACT. **Documentation three years prior to eligibility determination and/or enrollment will be accepted.**
- Is enrolled in an Adult Education and Family Literacy Act program including English as a Second Language **at time of eligibility determination and/or enrollment**.
- Has a deficiency in computing or solving problems, or reading, writing, or speaking English, as determined by the Career Counselor's observations when conducting an interview and/or completion of documents **at time of eligibility determination and/or enrollment determination.**

All justification of basic skill deficiency or lack thereof must be documented in the state data system.

Occupational and Educational Assessments

Occupational and educational assessments help individuals determine their potential success and satisfaction with different career options and work environments. These assessments reflect current and/or past occupational skills, educational history, work history, interests, and aptitudes.

Examples of occupational and educational assessments include interest inventories, and information collected during an interview regarding the individual's current and/or past educational history, credentials they've earned, and work history.

Occupational and educational assessments must be completed during the eligibility/enrollment process.

Supportive Service Assessments

Supportive service assessments include an interview and/or evaluation of strengths and barriers that may affect training and/or employment. Assessment processes should include a holistic review of an individual's' life experiences, such as but not limited to family dynamics, transportation, childcare, housing, justice involvement, and substance use disorder.

Supportive service assessments should also include an assessment of technology needs and digital literacy skills. A supportive service assessment should identify WIOA services that can help support an individual as part of a service strategy, as well as identify partner programs and resources that could offer additional support.

Support Service Assessments must be completed during the eligibility/enrollment process.

While assessments are completed prior to and during the eligibility/enrollment process, it is important to note that assessments can also be a vital part of the case management and follow-up process.

Policy 48 Personal Property on KCC Premises 5.21.25

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 48

Personal Property on KCC Premises

Effective Date 5/21/25

TENCO Workforce Development Board (WDB) and TENCO partner agencies do not asume responsibility for the lost, theft of, or damage to personal property on Kentucky Career Center premises, including the parking areas. TENCO WDB is not responsible for any articles placed or left in a vehicle, office, or desk that is lost, damaged, stolen, or destroyed. Individual should return any personal ítems found on KCC premises to the owner, if known, or to management.

Policy 49 Media Requests 07.29.25

TENCO WORKFORCE DEVELOPMENT BOARD

Policy No. 49

Media Requests

Effective Date: July 29, 2025

To ensure accurate, coordinated, and appropriate communication with the public and media, all Career Center staff are required to immediately notify their direct supervisor of any media inquiries.

- Media inquiries include requests for interviews, statements, comments, data, or information from reporters, journalists, bloggers, or any other media representatives—whether by phone, email, social media, or in person.
- No Career Center staff should speak to the media on behalf of the TENCO Workforce Development Board or Kentucky Career Center – TENCO, unless they have received prior approval from their supervisor and Director of Workforce Development.
- All media requests must be shared with the supervisor as soon as they are received. The supervisor will ensure the request is forwarded to the appropriate person for response.

This policy is in place to protect the integrity of our messaging, ensure consistent communication, and safeguard sensitive or regulated information.

Eligibility

WIOA ELIGIBILITY PROCESS

Purpose:

- To ensure consistency and confidence in the WIOA Eligibility process.

Procedure:

- The following procedure shall be used as guidance when determining an adult, dislocated worker, and/or youth eligible for WIOA services. Eligibility is determined when an individual has provided documentation necessary to ensure that specific requirements for WIOA have been met.
- All new individuals seeking any type of assistance through the WIOA/Career Center should be provided with a brief orientation of services (verbally, electronically, or through a brochure).
- The Career Counselor should answer the following questions prior to completing eligibility:
    - What is the county of residence?
    - What is the individual's past educational history? Does the individual have a credential?
    - What is the individual's employment history? (explain WIOA is an income-based program so it will be necessary to collect income information)
    - What is the customer's goal? If training, what program and training provider?
- These questions will help determine if the individual meets basic policy guidelines prior to completing eligibility.
- The customer should be informed of the documentation necessary to determine eligibility. The documentation must follow allowable sources as identified on the WIOA-1.
- Individuals who meet all requirements shall have the following completed:
    - Grievance/EO
    - Waiver
    - WIOA-1
    - MIS/ISS Form
    - Supporting documentation must be collected that matches the requirements of the WIOA-1. Documents must be valid (not expired and social security cards must be signed).
- If the individual is interested in training, the Need to Train documents (See Need to Train Procedure) are required to be completed.

NOTE: Only those who are justified as having a Need to Train will be able to move forward with training services. Therefore, it is important to gather this information prior to completing eligibility if the individual is only seeking training services.

- Prior to submission to Board staff for review, the adult and dislocated worker Career Counselors must receive Counselor approval from the majority of Career Counselors. This approval means that the customer meets the criteria to be considered for funding. See Counselor Approval Form.

KEE Suite:

- KEE Suite should be searched to determine if the customer is already in the system.
- Quick Registration should be completed if the customer is not already in the KEE Suite system. Quick Registration will not enroll the customer into any program (Wagner-Peyser nor WIOA).
- KEE Suite Tabs to complete prior to requesting Board staff to review include: Details, Related, Registration, Assessment, Eligibility (includes document uploads), and Notes.

NOTE: Do not click the "submit" button under the eligibility tab in KEE Suite. Board staff will review and submit once all records are accurate and meet local, state, and federal requirements. If the data does not match and/or KEE Suite is missing required data, the Board Staff will inform the Career Counselor and items noted will be changed/corrected.

NOTE: Eligibility requests that are received late (defined as within three days prior to the start of training), and/or are incomplete or inaccurate within three days prior to the start of training, will not receive priority for review and may not be completed by the time training has started.

NOTE: Final approval must be completed by Board Staff before any funds can be promised or awarded to a customer. Board staff will submit the Eligibility in KEE Suite, enter a case note, and email the Career Counselor stating that Eligibility has been approved. Any WIOA funds spent prior to enrollment will be disallowed costs.

NOTE: If an error occurs during the submission of eligibility, Board Staff may approve a paper application. A case note documenting the error, the paper approval, and the date of the approval must be included in KEE Suite.

Original Documents:

- While Board staff will accept the electronic documents to approve the record in KEE Suite, the original documents which include the MIS/ISS Form, WIOA -1 (and all supporting documentation), Grievance/EO, and Waiver must be completed and submitted to Board Staff. This is required by the independent auditors that review the workforce records.
- Uploading Documents:
- **NOTE**: Ensure you are uploading documents in the correct person's record. Uploading documents in the wrong record can result in a breach of confidentiality which will require a lengthy corrective action process.
- Upload all documents to the "Documents" tab. Eligibility related documents are those that are specifically related and support the WIOA-1. Select the item that is being verified (age, social security, citizenship, selective service, etc.) and upload the appropriate documentation. The documentation uploaded should match the selections made on the paper WIOA-1.
- Case Management documents such as grades/schedules/financial aid/budgets/vouchers/need to train, etc. for all customers shall be uploaded to the documents tab under "other", "other". Name the upload to match the document. Labeling the document in the "comments" section of the upload will ensure that documents are easily located within the electronic record.
- Once Board staff approves the eligibility, the Career Counselor should move forward with completing the remainder of the KEE Suite record which includes the IEP Tab, setting Measurable Skills Goals (if applicable) and the Services Tab. Counselors have 10 days to input services once eligibility is approved.

Quick Steps

- Meet with the customer.
- Provide an orientation and complete basic intake, assessment, and collect eligibility documentation.
- Note: All customers must receive an assessment, interview, and/or evaluation. The method used and results must be mentioned in case notes.
- Complete hard copy eligibility documents.
- Complete the Details, Related, Registration (must click submit registration near the top), Upload eligibility documents, Assessment (must click submit assessment near the top), in KEE Suite.
- Collect the Need to Train criteria if the customer is going into occupational skills training.
- Submit the Counselor Approval Form (Adult and DW Counselors) to the Career Counselors which should include details about the customer and the 6 criteria.
- Once the A/DW Counselors have agreed to funding, complete the eligibility tab (do not hit submit).
- Email eligibility and supporting documents to Board staff for review.

- Only after you have received an approval email from board staff can you move forward with funding the customer. Funding the customer includes completing the ITA, Financial Needs Analysis/Budget, and Vouchers.

NOTE: Comments can be added to records at any time. You do not have to wait until you have the customer approved. Do timely case management notes by entering them as you move through the process instead of after the record has been approved.

PY 2026 Low Income Chart

Maximum Household Income the Individual is Permitted in order to qualify as Economically Disadvantaged under WIOA

LOW INCOME CRITERIA (70% LLSIL or 100% FPL) – PY 2026

Kentucky – Workforce Innovation and Opportunity Act (WIOA) Title 1

Effective July 1, 2026 – June 30, 2027

Family Size	TABLE 1 Non-metro Area **WIOA ONLY**	TABLE 2 Metro Area **WIOA ONLY**	TABLE 3 Cincinnati Area **WIOA ONLY**
1	$15,960*	$15,960*	$15,960*
2	$21,640*	$21,640*	$21,640*
3	$27,320*	$27,978	$27,320*
4	$33,386	$34,542	$33,000*
5	$39,399	$40,767	$38,680*
6	$46,076	$47,680	$44,360
For each additional member add	$6,677	$6,913	$6,412

* HHS Poverty Level 2026

Find the applicant's county on the list below and determine which table to use.

COUNTY/TABLE	COUNTY/TABLE	COUNTY/TABLE	COUNTY/TABLE	COUNTY/TABLE	COUNTY/TABLE
Adair 1	Carroll 1	Grant 3	Knox 1	Mason 1	Robertson 1
Allen 1	Carter 2	Graves 1	LaRue 2	Meade 2	Rockcastle 1
Anderson 1	Casey 1	Grayson 1	Laurel 1	Menifee 1	Rowan 1
Ballard 1	Christian 2	Green 1	Lawrence 1	Mercer 1	Russell 1
Barren 1	Clark 2	Greenup 2	Lee 1	Metcalfe 1	Scott 2
Bath 1	Clay 1	Hancock 2	Leslie 1	Monroe 1	Shelby 2
Bell 1	Clinton 1	Hardin 2	Letcher 1	Montgomery 1	Simpson 1
Boone 3	Crittenden 1	Harlan 1	Lewis 1	Morgan 1	Spencer 2
Bourbon 2	Cumberland 1	Harrison 1	Lincoln 1	Muhlenberg 1	Taylor 1
Boyd 2	Daviess 2	Hart 1	Livingston 1	Nelson 2	Todd 1
Boyle 1	Edmonson 2	Henderson 2	Logan 1	Nicholas 1	Trigg 2
Bracken 3	Elliott 1	Henry 2	Lyon 1	Ohio 1	Trimble 2
Breathitt 1	Estill 1	Hickman 1	McCracken 1	Oldham 2	Union 1
Breckinridge 1	Fayette 2	Hopkins 1	McCreary 1	Owen 1	Warren 2
Bullitt 2	Fleming 1	Jackson 1	McLean 2	Owsley 1	Washington 1
Butler 1	Floyd 1	Jefferson 2	Madison 2	Pendleton 3	Wayne 1
Caldwell 1	Franklin 1	Jessamine 2	Magoffin 1	Perry 1	Webster 2
Calloway 1	Fulton 1	Johnson 1	Marion 1	Pike 1	Whitley 1
Campbell 3	Gallatin 3	Kenton 3	Marshall 1	Powell 1	Wolfe 1
Carlisle 1	Garrard 1	Knott 1	Martin 1	Pulaski 1	Woodford 2

This chart shows the amounts that represent the higher of the Federal poverty level or the 70% lower living standard income level as specified in WIOA Sec 3 (36) (A) (ii)(I)(II)

PY 2026 Self-Sufficiency Chart

MINIMUM INCOME LEVELS FOR
SELF- SUFFICIENCY (100% LLSIL) – PY 2026
Kentucky – Workforce Innovation and Opportunity Act (WIOA) Title 1
Effective July 1, 2026 – June 30, 2027

TABLE 1	TABLE 2	TABLE 3
Family Size	Non-metro Area **WIOA ONLY**	Metro Area **WIOA ONLY**	Cincinnati Area **WIOA ONLY**

Family Size	TABLE 1: Non-metro Area WIOA ONLY	TABLE 2: Metro Area WIOA ONLY	TABLE 3: Cincinnati Area WIOA ONLY
1	$17,184	$17,773	$16,496
2	$28,150	$29,120	$27,038
3	$38,637	$39,969	$37,117
4	$47,695	$49,345	$45,808
5	$56,284	$58,239	$54,061
6	$65,823	$68,114	$63,221
For additional members add	$9,539	$9,875	$9,160

COUNTY/TABLE	COUNTY/TABLE	COUNTY/TABLE	COUNTY/TABLE	COUNTY/TABLE	COUNTY/TABLE
Adair 1	Carroll 1	Grant 3	Knox 1	Mason 1	Robertson 1
Allen 1	Carter 2	Graves 1	LaRue 2	Meade 2	Rockcastle 1
Anderson 1	Casey 1	Grayson 1	Laurel 1	Menifee 1	Rowan 1
Ballard 1	Christian 2	Green 1	Lawrence 1	Mercer 1	Russell 1
Barren 1	Clark 2	Greenup 2	Lee 1	Metcalfe 1	Scott 2
Bath 1	Clay 1	Hancock 2	Leslie 1	Monroe 1	Shelby 2
Bell 1	Clinton 1	Hardin 2	Letcher 1	Montgomery 1	Simpson 1
Boone 3	Crittenden 1	Harlan 1	Lewis 1	Morgan 1	Spencer 2
Bourbon 2	Cumberland 1	Harrison 1	Lincoln 1	Muhlenberg 1	Taylor 1
Boyd 2	Daviess 2	Hart 1	Livingston 1	Nelson 2	Todd 1
Boyle 1	Edmonson 2	Henderson 2	Logan 1	Nicholas 1	Trigg 2
Bracken 3	Elliott 1	Henry 2	Lyon 1	Ohio 1	Trimble 2
Breathitt 1	Estill 1	Hickman 1	McCracken 1	Oldham 2	Union 1
Breckinridge 1	Fayette 2	Hopkins 1	McCreary 1	Owen 1	Warren 2
Bullitt 2	Fleming 1	Jackson 1	McLean 2	Owsley 1	Washington 1
Butler 1	Floyd 1	Jefferson 2	Madison 2	Pendleton 3	Wayne 1
Caldwell 1	Franklin 1	Jessamine 2	Magoffin 1	Perry 1	Webster 2
Calloway 1	Fulton 1	Johnson 1	Marion 1	Pike 1	Whitley 1
Campbell 3	Gallatin 3	Kenton 3	Marshall 1	Powell 1	Wolfe 1
Carlisle 1	Garrard 1	Knott 1	Martin 1	Pulaski 1	Woodford 2

This chart shows the amounts that represent 100% of the lower living standard income level as specified in WIOA Sec 3 (36)(B) and proposed rules section 680.210 (a)(1).

NEED TO TRAIN (TRAINING ASSESSMENT CRITERIA) PROCEDURE

Purpose

To ensure consistency when determining a customer's need to train criteria.

Procedure

The following procedure shall be used as guidance when determining the need to train a WIOA adult, dislocated worker, and/or youth. The need for training must be justified prior to enrollment in an occupational training service.

Note: KEE Suite may require you to answer the Need to Train questions regardless of the anticipated service type. However, justification as described in this procedure is specifically for occupational training services.

General

WIOA Regulations state that training services shall only be made available to employed and/or unemployed individuals who ***after an interview, assessment, and/or evaluation*** **and** ***career planning*** are determined to need training to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from pervious employment and ***have the ability to successfully participate and complete the training service.***

Interview, Assessment, and/or Evaluation

The process(es) used (interview, assessment, and/or evaluation) and information gathered must be noted in KEE Suite. The interview, assessment, and/or evaluation may be conducted at different intervals but must be completed prior to awarding funding and must, at a minimum, include the following:

- The applicant's basic information (living situation, household information)
- Employment history
- Educational background
- Strengths/Obstacles
- Basic Skill Assessment (policy 20)
- Customer's goals
- Referrals made for services (including TABE testing, if applicable)
- Eligibility – category (A, DW, Y)
- Youth – barrier used for eligibility
- Services needed or planned (training, support services, work experience, etc.)
- Activities provided in basic, individualized, and training (if applicable)

Customers should have a case note that reflects the different stages of enrollment: Basic Career Services, Individualized Career Services, and Training. These can be separate case notes or in the same case note if it is differentiated accordingly. All individuals should have at a minimum one item noted that falls within each category (Training – only if applicable).

Basic Career Services includes the following:

- General Intake
- Labor Market Information
- Referrals to Partners
- Orientation of WIOA Services
- Eligibility Process

Individualized Career Services includes the following:

- Work-Based Learning
- In-depth Interview and Assessment
- Out-of-Area and/or Relocation Assistance (DW)
- Support Services
- Development of the Employment Plan
- Case Management
- Youth Elements except Training

Training Services includes the following:

- Occupational Skills Training
- On-the-Job Training

Six Criteria for Need to Train (Training Assessment Criteria in KEE Suite)

- The following procedure specifically addresses the "need to train" criteria which can be part of the interview/assessment and eligibility determination. Details of the need to train must be included in the service tab, in notes, and documentation uploaded in documents. The uploads must be clearly named.
- There are six criteria that must be met and documented in KEE Suite prior to enrolling a customer in occupational skills training.

1. Is suitable employment available?

Consider whether employment is within a reasonable commute area. Also take into consideration the customer's current skill set, experience, and educational background.

Definitions:

Commute area is defined as 50 miles from their residence.

A marketable skill is defined as a post-secondary credential (certificate, diploma, license, or degree) or three years' experience within the last five years in a high-demand field (defined by the TENCO WDB). Credentials earned as a pre-requisite or as part of a career pathway is not to be included as a marketable skill. Example: C.N.A.

Process to Determine Suitable Employment:

a. **Individuals <u>with</u> a marketable skill** must *document* their **inability** to work in their current field to meet criteria one. This can be due to circumstances such as health, job stability has changed in the current occupation, hours available for work are no longer possible due to changes in family situation, credentials are expired and/or outdated. Customers who have a marketable skill as defined above but simply want to change their career field ***do not*** meet criteria one.
b. Examples of documentation for individuals with marketable skills who seek training funds may include:
    a. Health – Document from Vocational Rehabilitation, Doctor, or detailed self-attestation (verbal or written) describing how the health condition affects their ability to work in the high demand occupational in which they are credentialed or have a work history.
    b. Job stability has changed in the high demand occupation in which they are credentialed or have a work history – KY Stats data on projections and/or other economic development conditions (such as a layoff) indicating a decline in the need of workers with the customer's skill set.
    c. Hours available for work have changed – self-attestation on the reason why they can no longer work the hours typical for the type of job in which they are credentialed or have work history. An Indeed job search should be conducted to see if other possible employment opportunities are available with different shifts/hours.
    d. Credential is expired or outdated – review the date earned and work history under the credential.
c. To move to the next criteria, the Career Counselor must be able to answer "no" to the first question. If the answer is yes, the customer does not meet criteria one.

2. Are the appropriate trainings beneficial?
Consider and document how the training will assist the customer in being job ready.

a. <u>The Career Counselor must upload a document that reflects the expected credential earned upon completing the training program.</u> Examples include information from a website, flyer, or school brochure that indicates the credential opportunities for the customer's program of interest.
b. All training should result in the opportunity to earn a credential.

3. Is there a reasonable expectation for employment following training?
Explain the number of projected annual job opportunities in the local are for the customer's program of study.

a. There should be a reasonable expectation of employment opportunities following completion of the training. Career Counselors may use the TENCO Occupational Training List to reflect the occupation is in high demand as approved by the TENCO WDB.

b. <u>The document showing the expectations of employment should be uploaded.</u>

4. Is the training reasonably available?
Identify if the training is accessible to the customer within the local commuting area. Is the training on the Eligible Training Provider List (ETPL).

A. Commute area is defined as 50 miles from the customer's residence.

b. Upload a map showing the mileage between the customer's residence to the training institution that reflects the training is within 50 miles.

c. If the customer is attending training outside of the commute area and/or out-of-state training, the Career Counselor should discuss additional resources with the customer. The Career Counselor must justify in case notes why the customer has selected to go outside of the commute area and/or to an out-of-state training provider. Examples of justification may be due to shorter training length, acceptance into the program, only available training in the area, etc.

d. If training is outside of the commute area and/or out-of-state, the Career Counselor will utilize and upload the School Comparison Log to review three schools. The review should include the distance from the customer's residence, the cost, the start date of the next available training, and the length of training.

e. All occupational programs must be an Occupation in Demand as defined by the TENCO WDB and providers and programs must be on the ETPL for tuition, fees, and/or books to be paid through WIOA funds. Upload the ETPL document that reflects the provider and program is eligible for training funds. www.etpl.ky.gov

NOTE: If funding is used for support services only, the program must be an Occupation in Demand as defined by the TENCO WDB but does not have to be included on the ETPL.

5. Is training available at a reasonable cost?

a. Reasonable cost is defined as Morehead State University's cost of attendance per fiscal year. This can be found at www.moreheadstate.edu/admissions/cost-of-attendance. The case notes and Training Assessment Criteria should reflect MSU's current cost of attendance and the cost of attendance for the training institution the participant is attending. The cost of attendance for the participant's training institution should be uploaded to documents.
b. If the customer is attending training at an institution that is higher than MSU's cost of attendance, the Career Counselor should discuss additional financial resources with the customer. The Career Counselor must justify in case notes why the customer has chosen to attend training outside of the reasonable cost definition and how they will pay for the remaining portion of the training. Examples of justification may be due to shorter training length, acceptance into the program, only available training in the area, etc.

6. Is the customer qualified to undertake and complete the training? This includes financial, physical, and mental considerations. The Career Counselor should also determine the customer's interest matches the field of training.

a. The customer must have an indicator of success as defined by TENCO policy 20. Regardless of the indicator utilized, documentation must be uploaded in KEE Suite/Documents. Ex: Past grades, GED, Letter admitted in Apprenticeship, ACT, TABE, etc.

b. The customer will complete a personal budget sheet indicating they have the financial ability to attend training while maintaining their bills. The personal budget must be uploaded in documents.

c. The Career Counselor will discuss any physical and/or personal restrictions that could affect the customer's training and/or employment in the field (example: lifting, vision, criminal background, etc.). Issues noted that will affect the customer's ability to successfully complete the training and/or locate employment should be identified in case notes.

d. The customer will complete a career interest inventory, such as My Next Move or Career Edge, to indicate suitable training. The inventory results will be uploaded in documents.

NOTE: Career Counselors should be aware of and use the resources available through Vocational Rehabilitation when determining if a physical/mental condition might affect training and/or employment.

Based on evaluation and assessment, are skill-based training services needed as they will be unlikely to obtain/retain self-sufficient employment through career services alone?

a. The Career Counselor must be able to answer "yes" to this question to provide funded training services.

Additional Information:
Individuals who are already enrolled in a training program when applying for WIOA assistance must still meet the need to train.

The TENCO Workforce Development Board Policy #34 "Need to Train" includes additional local requirements. All Career Counselors should be familiar with Policy # 34.

References:
WIOA Regulations 680.200
Department of Workforce Development Policy "Need to Train" Effective 11/3/2015
TENCO Workforce Development Board Policy # 34 Need to Train
TENCO Workforce Development Board Policy # 28 Training Limitations

ITA and Financial Needs Analysis

A. Individual Training Account General Overview:

Purpose: The purpose for implementing procedures for the TENCO Individual Training Account (ITA) system is to provide uniformity of information and processes to ensure integrity of the system and compliance with Title I of the Workforce Innovation and Opportunity Act (WIOA).

ITA System:

Individual Training Account (ITA) is defined as a system implemented to establish a training account on behalf of an adult, dislocated worker, trade, National Emergency Grant, and/or out-of-school youth participants to provide a mechanism for paying educational expenses identified as allowable under the Act. The ITA outlines requirements and responsibilities of the customer to receive workforce training dollars. This document must be reviewed with the customer and signed **after** eligibility determination has been made and **prior/same time** as a Financial Needs Analysis (Budget) and/or voucher is issued.

Training and support services are only allowable for WIOA eligible individuals who are seeking training in a high demand occupation as approved through the TENCO Workforce Development Board. All occupational training funds (tuition and/or books) for adults, dislocated workers, and out-of- school youth must be used only for educational/training institutions on the statewide Eligible Training Provider List.

NOTE: The customer is not required to attend a school on the statewide provider list **if they are only receiving supportive services.** See supportive services policy.

Method of Payment for Tuition/Books

A training voucher is the only method of payment for tuition/fee costs. Books may be paid through a Vendor Voucher or reimbursed to the participant upon the Career Counselor receiving and approving a receipt.

Method of Payment for Support Services

Supply costs may also be paid through a Vendor Voucher or reimbursed to the customer upon proof of receipt.

Transportation and/or childcare is reimbursed to the customer upon the Career Counselor approving the documentation supporting the request.

Developing the Financial Needs Analysis:

~~Each fiscal year, the Career Counselor will be provided with a funding allowance in which to obligate funds for training and/or support services for new enrollees. Each time a new customer is enrolled the amount of their fiscal year funding is subtracted from their funding allowance. A Career Counselor may request additional funds from the Assistant Director at any time during the year. At the end of the fiscal year (June 30th), all remaining funds in the Career Counselor's funding allowance will be put back into a general fund to be re-issued.~~

TENCO must follow policy 2 "Supportive Services" and Policy 7 "Limitation on Costs" when completing a customer's financial needs analysis. While tuition, fees, books, supplies, and supportive services are all allowable, due to funding restrictions, Career Counselors must utilize their best judgment in developing a financial needs analysis for each customer. If a customer has federal financial aid, the federal aid should be utilized to pay for the tuition costs instead of, or in coordination with WIOA funds.

TENCO Career Counselors cannot establish a Financial Needs Analysis (budget) that exceeds the customer's unmet need or exceeds the Limitation on Costs policy. The unmet need is calculated by obtaining the Cost of Attendance for the training provider and subtracting all other financial aid resources. Do not include loans, estimated family contribution and/or the GI Bill as financial aid when calculating unmet need.

NOTE: WIOA staff are the only parties allowed to obligate WIOA funds. This procedure was established to ensure proper control and oversight of compliance with the Act as it relates to use of the ITA and obligation of funds.

NOTE: Policy 7 allows the Director to exceed the board cap on training/support funds with appropriate justification. The Career Counselor must put the request in writing with justification for the need of additional funding.

B. **Individual Training Account (ITA), Financial Need Analysis and Payment Process:**

ITA and Financial Need Analysis (Budget) Worksheet:

The following steps should be taken when planning and developing a financial needs analysis with the customer.

- The Career Counselor must complete the eligibility process (see procedures), an in-depth assessment, document the need for training, and complete an Individual Employment Plan (IEP). Participants must meet training policies and guidelines (Policies 1, 8, 9, 12, 20, 28, and 34). The eligibility, assessment and IEP must be completed in KEE Suite. Documents supporting eligibility and the need for training must be uploaded in KEE Suite.

- Case notes reflecting dates of activities, assessment, and services approved should be included in KEE Suite throughout the process.

- The Career Counselor must identify that the training occupation is in demand in the local area and if tuition and/or books are budgeted, the training provider and program is on the eligible training provider list.

- Adult/Dislocated Worker Career Counselors will present a written summary of the customer's assessment and need to train to the Counseling Review Committee. (Approval for funding is based on a majority vote). The Workforce Development Director may override a decision.

- The customer must provide proof of their application for other financial aid. If a program of study and/or training provider is ineligible for financial aid (such as workforce solution programs and/or some private institutions), the Career Counselor must document that the program/institution is ineligible for financial aid.

- If a financial need exists after calculating the cost of attendance documented by the training provider and accounting for all sources of funding, (excluding loans, GI Bill, and the estimated family contribution) the Career Counselor may provide financial assistance to cover all or a portion of the educational cost up to the cap designated by TENCO (see policy 7). Career Counselors shall ensure that an unmet need exists and that any funds obligated through WIOA do not result in an over-award of funds for the customer.

- The participant will review and agree to the guidelines of the ITA prior to the Career Counselor preparing a Financial Needs Analysis Worksheet.

  NOTE: <u>The ITA must be completed in KEE Suite as well in order to move forward with attaching a service for the customer.</u>

- The Career Counselor may deliver or email the ITA and Financial Needs Analysis Worksheet to the Assistant Director. The Assistant Director will enter the data on a Master Obligation database and submit the documents to the finance department/Fiscal Agent. Invoicing and payment/reimbursement will occur through the Fiscal Agent.

- The Financial Needs Analysis Worksheet shall include projected costs for the customer for the entirety of the customer's training program.

- If applicable, the Career Counselor will complete a TENCO voucher to be presented to the educational/training provider and/or vendor of services.

- The Financial Needs Analysis Worksheet will be marked "closed" by the Career Counselor and submitted to the Assistant Director when no additional WIOA funds are necessary/allowed.

NOTE: it is common for the Financial Needs Analysis to be updated throughout the semester. At a minimum the Financial Needs Analysis should be updated at the end of each training semester/session to reflect the actual costs (de-obligation). All updates are sent to the Assistant Director.

Funds may be de-obligated when participants fail to meet the policies and guidelines to continue funding, when a long-term break in training has occurred, when funds have not been expended as initially projected, when a participant has withdrawn or successfully completed training

NOTE: The ITA document only needs to be completed once prior to enrollment in the training unless the program of study and/or the length of training changes.

NOTE: A change in program of study should be within the sector that was originally approved and still requires that the program can be completed within the timeframe allowed by the TENCO WDB.

Payment Process:

<u>Training Expenses:</u> After the ITA and Financial Needs Analysis Worksheet are established, the customer may incur training and support service costs. If a training or vendor voucher is used for payment, a copy must be sent to the Financial Officer, wdowning@btadd.com. The vendor and/or training provider will then invoice Buffalo Trace Area Development District, Administrative Entity/Fiscal Agent for the TENCO Workforce Development Board, within 90 days of receipt of the voucher.

The following expenses may be paid directly to the participant with appropriate documentation of expenses: Books, supplies, mileage, and/or childcare expenses. Books and supply expenses may only be reimbursed to the participant with a valid receipt. Supplies must be included on the TENCO Supply

List. Mileage and/or childcare expenses are reimbursed to the participant based on TENCO reimbursement request forms (Policy 2 identifies cap on mileage/childcare) which are signed by the participant (childcare requires the childcare provider form and signature as well).

Supplies required for completion of a course of study are allowable expenses through an ITA if it is documented as a requirement by the educational institution. The Career Counselor will be provided with an approved supply list for each approved occupation. The Career Counselor should specify the allowable supplies and allowable supply amount when submitting a vendor voucher to the vendor. The vendor will invoice BTADD for payment. Payments will be made directly to the vendor based on the terms of the vendor voucher.

The Fiscal Agent will review invoices. If acceptable and the invoice amount is within financial needs analysis limitations, the voucher will be approved, and the Fiscal Agent will process payment. A check will be issued to the training provider/vendor/customer after entering invoice information into the Fiscal Agent accounting system.

If the customer has paid for the books and/or supplies, the Career Counselor must verify that the receipt is for the right amount, a legitimate request, and the cost was incurred after the ITA/Financial Needs Analysis Worksheet was completed. The Career Counselor will then submit the receipt and a request to reimburse the customer for the purchased items. The request would be sent to the financial officer at BTADD.

<u>Supportive Services:</u> Customers may be authorized to receive funding to offset the cost of mileage and/or childcare expenses while attending approved training. The Workforce Development Board has established a limitation on supportive services (see policy #2).

The Board has established a policy to cover mileage and childcare expenses when other sources of funding are not available or do not cover the full cost. **The need for support services must be included in the customer's case notes.**

Customers will submit supportive service reimbursement requests monthly. Career Counselors will review and approve all requests prior to submitting the form to the financial officer to process payment. A check will be issued for the participant after entering invoice information into the BTADD accounting system. After the check is issued, it will be mailed/sent to the Career Counselor for distribution. The participant must sign a copy of the check as documentation of receipt.

C. <u>Electronic and Hard Copy File Maintenance:</u>

<u>Individual Training Account Documents:</u> The Assistant Director will retain a copy of the ITA and Financial Needs Analysis Worksheet with any other corresponding information related to a participant's account. This file will also contain a copy of all supportive service requests and payments.

The Career Counselor should upload the following documents as it relates to this procedure:

- ITA
- All copies of the Financial Needs Analysis Worksheet

- Vouchers
- Proof of payment for training, books, and supportive services (Ledger)
- Support Service requests/forms (including supplies)
- Signed copy of support service check
- Financial Aid
- Cost of Attendance for the Training Provider
- Billing statement, if paying tuition

D: Youth:

In school youth, defined as attending any school at time of registration, are not eligible for services through an ITA. Out-of-school youth will follow these procedures when receiving funds for occupational skills/support services.

E: Exceptions:

An ITA is not required for the following training programs:

- On-the-Job Training
- Customized Training
- Incumbent Worker Training

Measurable Skills Gain

A. Measurable Skills Gain General Overview:

Purpose:

The purpose for implementing procedures for the Measurable Skills Gain is to provide uniformity of information and processes to ensure integrity of the system and compliance with Title I of the Workforce Innovation and Opportunity Act (WIOA).

Performance Measure:

The percentage of participants who, during a fiscal year, are in an education or training program that leads to a recognized secondary or post-secondary credential or documented academic, technical, occupational, or other forms of progress toward a credential or employment.

Measurable Skills Gain:

Customers enrolled in a WIOA training service, such as OJT, Occupational Skills, ITA, and In-School Youth, are required to have a measurable skill set at the time of enrollment in the training service.

If a customer continues training into a new fiscal year, the skill gain status must be reset for that year. Therefore, it is vital that once a customer completes their training, the service is closed.

Record successful achievement of the skill gain immediately upon being notified the skill gain has taken place. A skill gain will only be counted in performance if it is set and obtained during the same fiscal year. **The skill gain should not be set and achieved on the same day.**

Example: If a customer is enrolled in a WIOA training service on June 1st, the customer has until June 30th to show a skill gain. If the customer's training service carries over into the next fiscal year (even if just one day), a new measurable skill will need to be set and the customer will have until their exit or until the end of that fiscal year, whichever is the earliest, to reach a second skill gain.

When a skill gain is selected in KEE Suite, supporting documentation **must** be uploaded to document the gain.

Note: Support Service and Work Experience (non- OJT) services **do not** require a measurable skills gain. Only ITA, non-ITA, Youth Occupational Skills, OJT, and In-School youth services will require Measurable Skills Gains to be set and obtained. **All in-school youth must have a Measurable Skill Gain set.**

On-The-Job Training (OJT) and Measurable Skills Gain:

Employers provide monthly invoicing which includes a customer "rating" for each skill identified on the Training Plan and Reimbursement Request. This rating will be utilized to determine if the customer is making satisfactory progress toward achieving the milestones the employer identified. This form can be retrieved from the Assistant Workforce Director. In KEES, an OJT would have "Better Progress Report" selected for the Measurable Skills.

KEE Suite Procedure for Setting a Measurable Skill Gain:

1. Select the Workforce Case.
2. Go to the Measurable Skills Gain tab.
3. Click “new”
4. Select the Measurable Skill that best represents the goal your customer will likely reach.
5. Enter the start date for the Measurable Skill
6. Select not obtained.
7. Must complete comment box section.
8. Enter a case note stating which Measurable Skills Gain was set.

<u>KEE Suite Procedure for Obtaining a Measurable Skill Gain:</u>

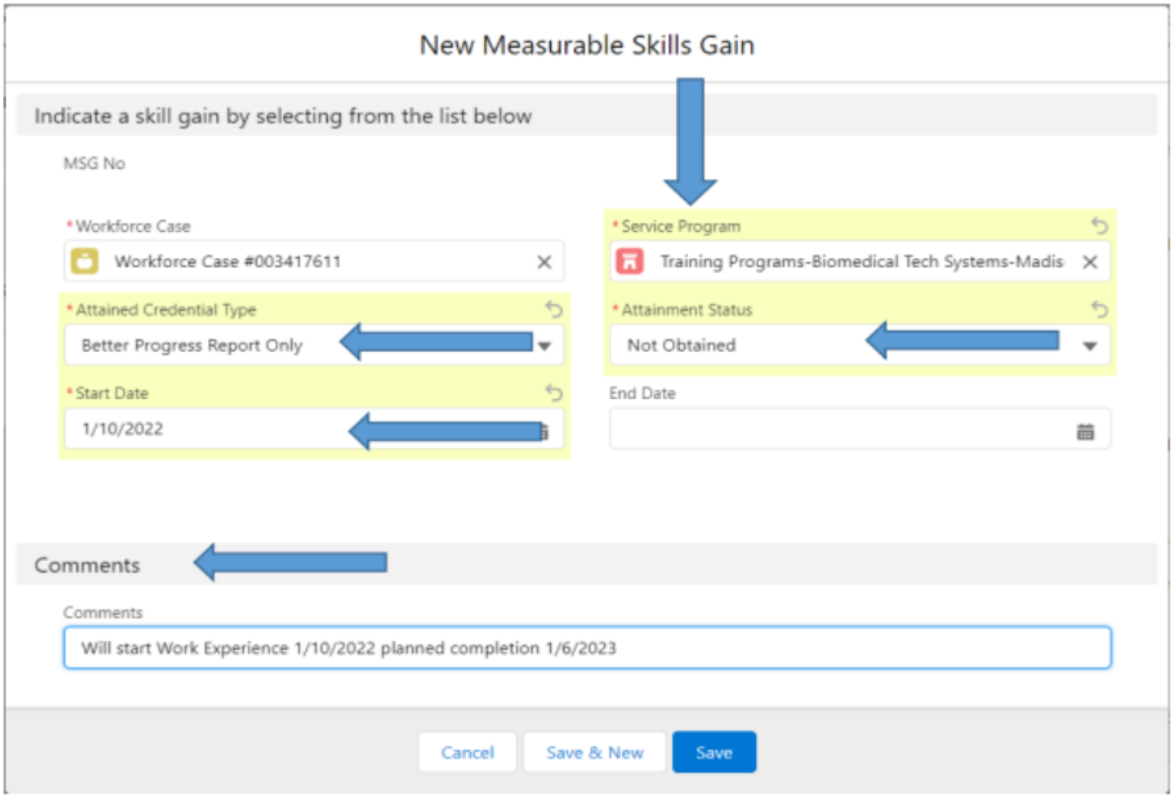
1. Select the Workforce Case.
2. Go to the Measurable Skills Gain tab.
3. Select the Measurable Skill that has been set
4. Change not obtained to obtained, if applicable.
5. Put in the end date (end date needs to be different than the start date).
6. **Add** (do not delete initial comments) to comments in the MSG tab to reflect obtainment.

9. Upload the data in the Documents tab to support the obtainment
10. Enter a case note reflecting whether the measurable skill gain was obtained or not obtained, including the reason for obtaining/not obtaining.

MSG Skill Gain	Definition of MSG	Comment Examples	Upload
Skills Progression			
EFL Gain via Credits/Carnegie towards HS – Youth only	Educational Functional Level Gain and is working toward a secondary diploma (HS or GED)	Set: TABE pre-test date on 8/15/2022; Math 8.2 Obtained: TABE post-test date on 12/10/22; Math 11.5	TABE or other recognized testing instrument that provides a grade level.
Training Milestone			
Secondary Transcript/Report Card – Youth Only	Enrolled in secondary education, has completed at least one semester and is making progress towards completion of high school/GED.	Set: Enrolled in high school and will graduate by June 1, 2023. Obtained: Graduated on May 29, 2023.	High School Transcript
Postsecondary Transcript/Report Card	Customers in post-secondary training AND will have completed two consecutive semesters which totals more than 12 credit hours during the program year and is meeting academic standards	Set: Enrolled in Respiratory Therapy on 8/20/22 and will maintain a 2.0 grade point average and complete 24 credit hours for the fall and spring semester. Obtained: Completed 24 credit hours with a 3.5 GPA	Transcript; Grades

NOTE: Skill gains are real-time to be entered at the time of the gain. **Customer's enrolled in WIOA training service will have a skill gain, regardless of their date of enrollment, that will expire on June 30th of each year.** Customers should not be denied services based on this, but the counselor should be cognizant of timelines when enrolling individuals into training services.

Initial MSG


New Measurable Skills Gain
Indicate a skill gain by selecting from the list below
MSG No
*Workforce Case
Workforce Case #003417611
*Service Program
Training Programs-Biomedical Tech Systems-Madis
*Attained Credential Type
Better Progress Report Only
*Attainment Status
Not Obtained
*Start Date
1/10/2022
End Date
Comments
Comments
Will start Work Experience 1/10/2022 planned completion 1/6/2023
Cancel
Save & New
Save

Completion and Follow-up

Purpose: The intent of developing completion and follow-up procedures is to ensure uniformity of information, ensure continued participant success, and to provide quarterly performance information.

1. GENERAL OVERVIEW OF THE FOLLOW-UP PROCESS

The follow-up process is the continuation of contact for one year after completion of all services/activities (following a generated exit date in KEE Suite) with adult, dislocated worker, trade, and youth customers of the TENCO WIOA program. This process is designed to allow staff to continue services to exited customers and assist them in overcoming obstacles they encounter in securing and retaining employment. Follow-up services may include resume writing assistance, interviewing assistance, job search assistance, referrals to partner agencies, or other non-funded assistance needed by the customer.

The TENCO WDB follow-up procedure allows the local area to maintain real-time performance data on all WIOA enrolled customers.

2. PROCEDURES

<u>Completion of Services</u>

- Circumstances which warrant completion from all WIOA services include but are not limited to:
- Customers voluntarily leave the program.
- Customers involuntarily are removed from the program.
- Received unsubsidized employment.
- Entering post-secondary or advanced education not paid by WIOA funds (youth only - requires documentation, which can be confirmation from the customer and/or training provider which is detailed in notes)
- Hard exit due to Institutionalized, death, long term medical, or youth who are enrolled but have been relocated to a mandated program.

NOTE: Hard exits are only completed if the reason utilized will have the individual out of the workforce for 90 or more consecutive days. The reason for the hard exit must be documented in KEE Suite. Only the Quality Control Coordinator can complete the hard exit in KEE Suite.

KEE Suite should be updated with new employment information (if applicable), credential earned (if applicable), updated contact information and case notes regarding the customer's completion reason. The Career Counselor will complete the following in KEE Suite:

- Ensure the MSG, if applicable, has been set and completed
- Ensure all services have an accurate end date.
- Enter an ITA outcome, if applicable.
- Complete, submit, and upload a training closure budget, if applicable.
- Enter Case Note identifying the request for exit and the reason for exit.
- Upload any supporting documentation for credential and MSG, if applicable
- Submit the exit request google form to the Quality Coordinator.

Counselors should obtain and verify a secondary contact number for the participant prior to exit. This can be a family member, friend, etc.

Board staff will review KEE Suite and enter the data from the Exit form on the local performance management spreadsheet. Funding streams will be reviewed for accuracy. Board Staff will email the Career Counselor noting any revisions that need to be made in the electronic file. If no revisions are necessary, the Counselors will receive an email informing them that the exit has been accepted.

NOTE: Staff-Assisted activities will keep the customer's case open. Therefore, it is pertinent for the Career Counselor to monitor the final exit date in KEE Suite closely to document information in the appropriate follow-up quarter.

Any customer that continues to need and receive services should receive a staff-assisted activity in KEE Suite. Customers who simply use the resource room ask for basic information, and/or conduct their own job search where no assistance was provided by staff should NOT receive a staff-assisted activity in KEE Suite once the Career Counselor has submitted an exit request.

NOTE: All customers who have not received an activity or service in 90 days will automatically exit. The date of exit will revert to the last activity date or the last service end date, whichever occurs later.

KEE Suite will have a yellow banner across the workforce case indicating the case has officially closed. The exit date can be found in the navigation bar of the KEE Suite Workforce Case.

Follow-Up

Throughout the customers' enrollment in WIOA, the Career Counselor should inform the customer that they will receive follow-up services, at a minimum, each quarter after exit. The customer should be encouraged to respond to follow-up contacts and to provide the documentation necessary to verify employment. Follow-up services may be by email, phone, and/or text.

If the customer is not working, the Career Counselor should re-engage the customer and offer non-funded Career Center services, such as links to employment services, partner agencies, and assistance with resume/interviewing skills.

NOTE: Follow-up is a youth element that must be provided for 12 months following the exit.

During the first, second, third and fourth quarters (five quarters are required for trade customers) of follow-up, the Counselor responsible for follow-up will contact the customer and/or employer and/or training institution (youth) to verify status and the need for additional services.

Counselors responsible for follow-up will record data in Outcomes in KEE Suite each quarter. A case note will be added each quarter with documentation on employment and/or training (youth) information: Start Date, End Date (if applicable), Name of Company, Location, Wages and Phone Number.

Board staff will receive a Google follow-up form each quarter from the Counselor with supporting documentation uploaded and/or noted in KEE Suite.

Board staff will compile data on a local spreadsheet related to performance measures for exited customers. Documentation of performance will be reviewed in KEE Suite and compared to the data spreadsheet quarterly.

NOTE: Employment outcomes are required each quarter. An ITA outcome is only required once for A/DW/Y.

NOTE: Employment outcomes should only be entered after the "yellow banner" and an official exit has taken place in the system. Do not enter employment outcomes prior to this taking place in the system. If the "banner" does not appear when it should, continue to contact and report the information in notes. Once the banner appears, complete the outcomes for all relevant quarters. A note must be in KEE Suite identifying that outcomes could not be entered during the relevant quarter.

KEE SUITE Procedures

1. Check to ensure the MSG is accurately completed, if applicable. There should be an MSG set for each performance year where the participant was in an applicable training service, even if it was only for one day during that fiscal year.

2. Complete the service by adding an end date once the customer is no longer participating in that service.

3. If the customer was in a training service (ITA, non-ITA, Occupational Skills -youth, OJT, or in-school youth) enter the training outcome.

4. Add a case note regarding the plan to exit the customer from the program, which should include the exit reason.

5. Complete, submit, and upload a closure training budget, if applicable.

6. Complete and submit the Google exit request form to Board staff.

7. Board staff will review the KEE Suite record for items such as services have a closed/end date, services have the correct funding stream attached, measurable skills (if applicable) are entered correctly, documents reflecting the performance criteria have been uploaded, services match the IEP youth elements (youth only), and notes have established a reason for the exit.

NOTE: Throughout follow-up, KEE Suite must have employment outcomes reported for all four quarters following exit. Individuals who participate in training will also have one training outcome.

NOTE: Youth who are in post-secondary education during the 2nd and 4th quarter of follow-up, will mark the Post-Exit Outcome for Youth only.

NOTE: Youth who receive both secondary and postsecondary credential should only have one outcome in KEE Suite. If possible, the more recent outcome is preferred.

Comments/Notes will be added for each quarter and shall include the relevant information regarding the customers stats and/or services provided by the Career Counselor to assist the customer with their employment/training goals. Notes will include employment information (name of business, address, phone number, hire date), personal issues involving the customer that may affect employment, resolution and/or services offered to assist the customer, and other information as deemed appropriate.

The Counselor must attempt a minimum of three times each quarter to contact the customer. Attempts must be documented in notes. However, contacts should continue throughout the entire quarter.

If the customer is not working, he/she should receive referrals to job possibilities, job fairs, other partner agencies, and/or services through the Career Center.

NOTE: Performance is calculated for employment in the customers' 2nd and 4th quarter after their exit quarter. Customers who are not employed and actively looking for employment should receive intensive follow-up services to assist with the employment goal. The Education and Labor Cabinet provides a performance report quarterly to the local area. Board staff provides Direct Service Providers with performance specific to their programs and staff.

Primary and alternate contact information should be verified each quarter. Any change in the customer's contact information will be recorded in KEE Suite.

When follow-up is completed, a note will be entered in KEE Suite reflecting the end of the follow-up period.

NOTE: Follow-up is completed one year from the exit date. Therefore, during the 4th quarter of follow-up you should be aware of the actual exit date and ensure data is entered in KEE Suite prior to the one-year anniversary.

NOTE: A customer can request to end follow-up services. The request must be documented in notes. The customer is then removed from the follow-up list. The Counselor must email Board staff to reflect the follow-up closure on the TENCO database.

NOTE: If KEE Suite does not reflect an exit after 90 days from the last service date and/or the last staff assisted activity date, contact Board staff. Board staff will report the issue.

GENERAL INFORMATION:

- Employment Rate is evaluated in the 2nd and 4th quarter after exit.
- Median Earnings are evaluated in the 2nd quarter after exit.
- Credential Attainment is evaluated within 4 quarters after exit.
- Skills Gains is real time and evaluated for all customers enrolled in 1)a training service, 2)enrolled as an in-school youth, 3)occupational skill element, 4) On-the-Job Training 5) or work experience that are active or exited during the performance period.
- Each customer only receives credit for one skill gain during the performance period. The performance period is from July 1st – June 30th. Therefore, if an individual is enrolled into the program as of June 1st, the measurable skills gain will need to be accomplished by June 30th. The timeframe resets July 1st. Customers who cross into multiple performance periods will have multiple measurable skill gain requirements.

Transitional Jobs

INTRODUCTION

Transitional Jobs is defined as a time-limited work-based learning experience that provides the customer with subsidized wages under the authorization of the Workforce Innovation and Opportunity Act. Transitional jobs are available only for **eligible adults/dislocated workers with barriers to employment *and* who are chronically unemployed or have an inconsistent work history (see definition below)**. Transitional Jobs are designed to enable an individual to establish a work history, demonstrate work success, and develop skills that lead to unsubsidized employment. While job retention is the goal, there is no requirement that the individual be retained in their transitional job after the experience is over. Under WIOA, local boards may use up to 10% of the Adult and Dislocated Worker funds to provide transitional jobs to individuals. Transitional Jobs may be offered to eligible WIOA adults and/or dislocated workers over the age of eighteen who are not attending secondary school.

DEFINITION OF TERMS

1. Barriers to Employment: Individual who meets eligibility requirements for the TENCO WIOA Adult and/or Dislocated Worker program and is facing one or more of the following obstacles:
    - English Language Learners
    - Individuals on KTAP
    - Homeless
    - Disabled
    - Individuals re-entering the workforce who are or have been incarcerated
    - Individuals in recovery
    - Older Workers (55 + Title V)
    - Individuals without a GED or high school diploma
    - Individuals who have aged out of foster care

2. Chronically Unemployed: An individual who has not been employed for 27 or more consecutive weeks.
3. Inconsistent Work History: An individual who has not held a full-time unsubsidized job for more than 13 consecutive weeks during the past year OR an individual who has had three or more unsubsidized jobs during the past year.
4. Immediate Family: wife, husband, son, daughter, mother, father, brother, brother-in-law, sister, sister-in-law, son-in-law, daughter-in-law, mother-in -law, father-in-law, aunt, uncle, niece, nephew, grandparent or grandchild.

It is not the intent to utilize WIOA funds to provide transitional jobs for individuals in training programs that have internships/clinical experiences built into their program of study. Nor is it the intent to utilize WIOA funds to provide transitional jobs if those opportunities exist through other programs in which the customer participates.

ELIGIBILITY:

Individuals seeking Transitional Employment through WIOA funding must meet eligibility guidelines, as applicable for the category of funds being utilized (A or DW). All WIOA documents must be completed: Waiver, Grievance, and WIOA - 1. Individuals must have completed an assessment (interest, educational background, employment history, strengths, and obstacles) and be determined in need of transitional employment to participate in the program.

Transitional Employment opportunities may take place at private, public, and non-profit employers. TENCO sectors are not required to be utilized for placement due to the learning experience associated with Transitional Employment. Individuals may not be placed in worksites where he/she will be supervised by an immediate family member.

GENERAL:

Individuals must follow policies of the Workforce Development Board.

This is not an entitlement program. The assessment conducted must indicate the Transitional Jobs program would benefit the person in reaching his/her employment goal; the individual can be successful in the transitional job; and that barriers to successful completion of the transitional employment have been alleviated.

Transitional employment may not be the final destination for the customer's served. It is designed to develop a positive work history, gain essential work skills, build self-confidence and employment awareness, while supporting the business need in the local area.

TRANSITIONAL JOBS PARAMETERS

a. The duration of the transitional employment cannot exceed 520 hours. Customers cannot work more than 40 hours per week.

b. Pay rate will be based on the prevailing wage for the position.

c. Transitional jobs must be combined with career services including essential work skills, case management and referrals to partner agencies. Essential work skills may be provided by a partner program.

d. Support services such as mileage, work-related supplies, and/or childcare are allowable and should be utilized when necessary to ensure success in transitional employment. Support services are only available to individuals enrolled in transitional employment when necessary and other resources are unavailable.

e. Transitional Jobs are considered an **Individualized Career Service** for adults and dislocated workers.

f. An assessment and WIOA eligibility must be conducted prior to placement in a transitional job.

g. Staff must document the justification for transitional employment in the applicable case management database.

h. Individuals in Transitional Employment will be in the local area's performance.

i. Transitional jobs must provide at least a 20-hour work week for participants. .

j. The employer of record will be the actual worksite and/or a temporary agency utilized to place individuals in short-term employment opportunities. The entity that is identified as the employer of record shall be reimbursed for wages paid to TENCO Workforce Development Board participants following the guidelines above. Reimbursement will be 100% of the gross wages paid for the participant while in work-based learning. Temporary agencies are entitled to 100% of wages and oversight costs established through a pre-approved agreement.

WORK SITE

The worksite will ensure that the participant's hours of work are recorded and easily submitted to the TENCO Workforce Development Board staff. The TENCO Workforce Development Board will not pay for any overtime hours worked by the participant. Overtime hours are at the cost of the employer. Reimbursement to the business shall only be paid for the documented hours worked and paid during the transitional job period.

Transitional Jobs Agreement: The TENCO WDB requires a written signed agreement between the Board and the worksite prior to the participant starting work.

1. Name and contact for the Worksite
2. Name and contact for the participant
3. Participation period
4. Rate of Pay
5. Maximum hours allowable
6. Position title
7. Workforce Innovation and Opportunity Act guidelines
8. Job description/responsibilities
9. Assurances
10. Signatures of all parties involved

An evaluation (provided by Buffalo Trace Area Development District) must be completed by the employer each month and submitted to Buffalo Trace Area Development District staff or their designee. The evaluation will be specific to items the participant is to learn during the work-based learning experience. This will be utilized to show skill progression for measurable skill performance.

BUSINESS ELIGIBILITY

Transitional employment must be for a position that pays an entry level wage of $7.25 per hour or higher. This is a cost reimbursement program. All businesses will be required to submit a monthly invoice which shall include documentation of hours worked, payments made to the participant, and an evaluation of work..

Transitional jobs may be in private and/or public businesses/organizations. Transitional Jobs shall not be approved for the following: swimming pools, golf courses, gambling establishments, political activities, or in the construction, operation, or maintenance of a facility used for religious instruction or worship.

The business cannot be in layoff status. No current employees can be displaced, fully or partially, because of the Transitional Jobs Program. Businesses must have a stable location, as defined as being in their current location for 120 or more days. The worksite may not employ someone through transitional jobs to fill positions affected by a layoff from the same or any substantially equivalent job. Businesses must meet and agree to all assurances regarding non-discrimination and safety standards. Placements cannot infringe on the promotional opportunities of currently employed workers at the date of participation.

MONITORING

WIOA program staff must ensure regular and on-going monitoring and oversight of the Transitional Jobs program. Monitoring may include on-site visits as well as off-site communication with the employer and/or participant.

Businesses will be monitored to ensure they meet labor laws and follow the Transitional Jobs Agreement. Any deviations from the Agreement should be dealt with promptly. Termination of the worksite may be executed immediately upon a written notification for illegal and/or non-compliance concerns.

MAINTENANCE OF RECORDS

Records shall be maintained in the same manner as all WIOA programs. The state approved case management database shall be used to document eligibility, assessment, IEP, referrals, case management, services, activities, goals, and outcomes.

ASSESSMENTS:

All applicants will complete a basic assessment to determine past work history, educational experience, interests, goals, strengths, and obstacles. This will be recorded in the applicable case management system. Assessments shall include an interview with a Career Counselor and may include Interest Inventories, Job Search, Career Edge modules and other assessments determined applicable by the Career Counselor. Information may be shared among partner agencies when it is in the best interest of the customer and assists them in meeting their goals.

ELIGIBILITY and ENROLLMENT APPROVAL:

Approval for eligibility and enrollment will be completed following the current WIOA A/DW process.

PROCEDURE:

The following is the procedure for the Transitional Jobs program.

1. Participant may be referred by other agencies, entities, businesses, or apply based upon awareness of services available.
2. Participant completes the assessment and eligibility phase.
3. Participant is enrolled in KEE Suite.
4. Career Counselors and Business Service Coordinator works closely to assist in employment and/or partner referrals.
5. The participant participates in essential skills training which at a minimum includes information on presenting self, interviewing skills, problem-solving, and communication.
6. The Business Service Coordinator contacts the business to ensure the business meets the criteria for the program and is interested in participating.

7. The Business should be given an orientation of the program, including expectations and responsibilities of the worksite.
8. Provide the business an opportunity to meet the customer and conduct an interview, do background checks, etc., if desired.
9. If a temporary placement agency is utilized as the employer of record, the participant is referred to the temporary agency for enrollment.
10. Notify the participant of the official start date, specifics regarding the job/place of business, and remind them of their obligations.
11. The Business Service Coordinator will ensure the business has signed the Worksite Agreement. The Training Plan should outline the skills that the participant will learn during the placement.
12. Upload the Training Plan and Worksite Agreement into KEE Suite.
13. The Employer of Record will invoice BTADD once per month with the following documents included:
    - the customer's timesheet/record of hours worked,
    - paystub or other document verifying wage, hours worked, fringe, gross and net pay
    - documentation of oversight costs (Temp Agency)
    - evaluation of work
14. The Career Counselor will case manage the participant monthly (at a minimum) and include a case management note in KEE Suite. This will require contact with the participant and/or with the business.
15. The Business Service Coordinator and/or Career Counselor will assist the participant in finding unsubsidized employment prior to completion from WIOA.
16. Complete the participant from KEE Suite once a successful outcome has been accomplished.
17. Completion and Follow-up will utilize the same procedures in place for other WIOA programs.

OUTCOMES:

Customers are included in WIOA performance measures as appropriate for the funding stream in which they are enrolled. Performance measures includes Employment 2nd and 4th quarter, wages, and measurable skill gains.

OTHER BUSINESS SERVICES:

The following outlines additional responsibilities for the Business Service Coordinator:

1. Maintain a list of sites utilized, contact information, and outcomes. Enter the business services into the KIBES data base.
2. Inform the business when the participant is close to completing his/her hours.

3. Send a closure letter to the business and request they complete the Customer Service Survey.

<u>Administrative Staff responsibilities:</u>

1. Have a file on each customer and/or worksite/contract with the following documentation:
    A. Original Worksite Agreement.
    B. Original Training Plan for each customer.
    C. Timesheets.
    D. Verification of payment/copy of checks
    E. Monthly Skills Assessments
    F. Documentation for supportive services (if applicable)
2. Assign appropriate Vendor Numbers to the Employer of Record.
3. Maintain spreadsheet that identifies the participant's name and WC#, worksite, the start date from transitional employment, the approved hours, the end date of the agreement, hours worked, and balance of hours.
4. Keep track of funding availability for Transitional Jobs.

WIOA Regulations: 680.190; 680.195

Business Services Manual

Vision:

Business Services will meet the needs of employers in the TENCO region by providing an educated, adaptable labor force, providing quality referrals and non-duplicated services that link skilled job seekers to self-sustaining employment opportunities. The Business Service team will ensure business resources are known and easily accessible for the local area, while establishing a clear channel for employment engagement in the workforce system.

TENCO Workforce Development Board:

The TENCO Workforce Development Board is comprised of 20 members that includes business and partner agencies. Based on the WIOA Law, the Board is responsible for the oversight and operations of the KY Career Centers in the local area, including Business Services. The board reviews items such as customer enrollment, performance, customer satisfaction, accessibility to partner services, ensuring career center standards are met, economic development and labor market data, efficient and effective delivery of business services, transparency of services and costs, and ensure centers have the technology and supplies necessary to operate while utilizing the most cost-effective method available.

Strategic Board Goals:

- Job preparation and training services for targeted populations such as justice involved, substance use disorder, long term unemployed, individuals on government assistance, veterans, disabled individuals, and those without a high school diploma.
- Increase apprenticeship awareness and participation.
- Increase work-based learning activities (OJT, Work Experience, Transitional Employment).
- Increase outreach activity and business awareness of available services.
- Increase business engagement and measure satisfaction of services.
- Engage and align business and education.

Core/Intensive Business Services:

Core Business Services:

- Placing general Job Orders in the state system.
- Informational Services – cold calls, leaving brochures of services with a business, and/or providing general information about the workforce system, business incentives, and/or partner services.

Intensive Business Services:

- Assessments provided on behalf of a business request (Work-Keys/NCRC, TABE, Etc.)
- Strategic Planning
- Economic Development/Labor Market Information for grants and/or strategic planning

- Rapid Response Activities including Layoff Aversion
- Work-Based Training, including co-ops
- Incumbent Worker
- OJT
- Registered Apprenticeship
- Transitional Employment
- Work Experience and Internships
- Workforce Recruitment efforts including off-site or on-site Job Fairs and Hiring Events
- Application Screening
- Providing Company Tours
- Assist with Writing Job Description
- Recruitment and Retention Analysis Plans
- Direct Referrals to Employment Opportunities
- Vocational Rehabilitation services for businesses and/or individuals placed in employment opportunities
- Career Coaching services
- Adult Education services for employees
- Trainings/Workshops provided to assist businesses in meeting their needs
- Customized training for employees
- Assisting business with utilizing incentives, bonding, or tax credits

All WIOA staff, contractors, and partners will report and/or record business service activities in KIBES/Salesforce. If the staff/contractor does not have access to Salesforce, the necessary information will be prepared and presented to one of the Business Service Coordinators for entry.

Business Services should be available at each KY Career Center located in TENCO as well as off-site. Virtual services, especially informational core services, should be easily accessible.

Business Service Team:

The Business Service Team is made up of staff and partner agencies, such representatives from Employment Services, WIOA Title I Adult/DW/Youth, Veteran Services, Workforce Solutions, Vocational Rehabilitation, Adult Education, Goodwill, Recovery, Economic Development and Justice Involved. The team has quarterly meetings facilitated by the Business Service Specialist. Any member of the team may contact businesses, assist with services, make referrals, and conduct case management and/or follow-up services with the employer. All team members should be aware of and be able to present general information on any services available through their partner agencies.

The team may:

- Conduct on-site meetings with businesses, develop and maintain a general understanding of the business and their specific needs.
- Utilize Labor Market data to assist businesses in economic development decisions.
- Collect data on job seekers that align with job vacancies and make quality referrals based on an individualized assessment of skills, needs, and experience.
- Maintain awareness of community resources to offset any barriers facing individuals linked with employment opportunities. Assist with making resources readily accessible to business and the public.
- Establish, facilitate, and/or participate in job fairs/hiring events in the local area.
- Highlight local area businesses on social media platforms.
- Make quality referrals to partner services.
- When a business is in layoff status and/or closes, the Business Service Specialist will organize the Rapid Response event in coordination with Business Service Team. This event will connect individuals with community resources.
- Provide layoff aversion services to businesses who are at risk of layoff or closure.
- Identify common trends within industries.
- Recommend business representatives for the TENCO Workforce Development Board.

Business Service Team members may also work directly with individual job seekers to provide them with a direct link to employment opportunities. Services to individual job seekers may include assessment, enrollment in Wagner-Peyser, referral to community resources, enrollment in Adult Education, enrollment in Vocational Rehabilitation, training, work-based learning opportunities, workshops, job preparation training, and other services that will provide the customer with the skills and/or resources necessary to obtain and retain employment.

Business Service Resources:

- Adult Education Services – A partner program that is committed to providing academic and essential skill instruction to help Kentuckians get the education they need to be successful. This may include basic skill remediation, Kentucky Career Readiness Certificate, GED, English as a second language, or other essential skill development through the WIN virtual program.

- Work Opportunity Tax Credit (WOTC) – A federal program providing a tax credit to businesses to hire specific target groups that typically face significant barriers to employment. Target groups include the following:

1) Qualified IV-A recipient; 2) Qualified Veteran; 3) Qualified Ex-Felon; 4) Designated Community Resident; 5) Vocational Rehabilitation Referral; 6) Summer Youth Employee; 7) Supplemental Nutrition Assistance Program (SNAP "food stamps") recipient; 8) Supplemental Security Income (SSI) recipient; 9) Long-term Family Assistance recipient; and 10) Qualified Long-term Unemployment recipient.

- Apprenticeship Programs – Combines on-the-job training and classroom instruction under the supervision of an industry professional. Businesses meet their current employment needs while preparing for the future workforce needs. Individuals have immediate employment while gaining the skill set to move up in the company. It is a customized training specifically designed for that business which reduces future recruitment needs and builds a pipeline of industry talent.

- Incumbent Worker Training – Training that is designed to meet a specific employer's need that will help them retain a skilled workforce, avert the need to lay off employees by helping them obtain new skills, and/or ensure the business is locally competitive by providing upskilling for their employees. Businesses are responsible for 50% of the cost of training (can be in-kind). Incumbent worker training funds are supported through the WIOA Title 1, adult/dw/youth program.

- Federal Bonding – This program is available to employers who hire "at-risk" hard-to-place job seekers. At risk categories includes justice involved, individuals in recovery, welfare recipients, individuals with poor credit records, economically disadvantaged youth and adults who lack work history, and individuals who have been dishonorably discharged from the military. The Federal bonding program protects the employer against losses caused by fraudulent or dishonest acts of the bonded employee. The bond is good for the first six months of employment at no cost to the job applicant or the employer.

- WIOA – Along with the business services as mentioned above, the Workforce Innovation and Opportunity Act can provide other services such as Work Experience, Incumbent Worker Training, On-the-Job Training, Transitional Employment, Occupational Skills Training and Supportive Services, Dislocated Worker Relocation and Dislocated Worker out-of-area job search. Individuals placed in any of these activities must be WIOA eligible and enrolled prior to starting the activity.

- Rapid Response – A Business Service that helps businesses and workers deal with the effects of layoffs and plant closures. A Rapid Response Coordinator is responsible for ensuring contact is made with the affected business, gain valuable employee data, coordinate meetings with the business and facilitate the official Rapid Response event. The Rapid Response Coordinator may designate a core partner that has connections with the business to conduct the initial contact and collection of data. The Rapid Response event includes details and contact information for community resources to help the individual transition to other employment and/or training.

- Office for Vocational Rehabilitation – OVR's mission is to empower individuals with disabilities to maximize independence and economic security through competitive, integrated employment. OVR may assist a disabled individual in obtaining items that allows them to successfully gain employment such as hearing aids, glasses, computer screen enhancers, technology-based equipment, and more. OVR also works with businesses to ensure accommodations are made for customers, as well as provide ADA training.

- Bluegrass State Skills – The Cabinet for Economic Development assists in keeping Kentucky's businesses competitive by providing financial assistance to train their workforce. The Grant-in-Aid and Skills Training Investment Credit provides a funding resource for flexible, employer-driven skills - upgrade training. GIA provides cash reimbursement for occupational and skills upgrade training necessary for businesses to remain competitive. The STIC offers state income tax credits for companies to offset the costs for approved training programs for their workforce.

- Workforce Solutions – Workforce Solutions develop customized training opportunities available through the local Community and Technical College.

- KCTCS TRAINS – Funding available through the Kentucky Community and Technical College that supports in-depth customized employee training for businesses which allows their employees to train, retrain, and upskill their current workforce.

- Wagner-Peyser – Provides free labor exchange services to job seekers and businesses. Wagner Peyser services include assessing individuals who are seeking employment, referring individuals to partner resources to alleviate barriers to employment, and making quality referrals to businesses.

- Local Veteran Employment Representative - The local LVER conducts employer outreach on behalf of the veteran population. Outreach promotes the advantages of hiring veterans and helps businesses understand the services available to them.

- Disabled Veteran Outreach Program – DVOPs help veterans and spouses of veterans who have significant barriers to employment due to being disabled connect with resources that can assist them on their employment journey.

- KIBES - Kentucky Integrated Business Engagement System (KIBES) is the tool used by the Education and Labor Cabinet and local partners to manage business customer engagement as required by WIOA.

- Transitional Employment – Individuals with significant barriers to employment (as determined by the local workforce development board) may be eligible for transitional employment. This is a time-limited, 100% paid work experience with public, private, and/or non-profit organizations that assists individuals with important workplace skills.

- On-the-Job Training – The OJT program provides job seekers with employment opportunities when their skill set and/or experience doesn't align with the position in which they are applying. The program pays 50% of the job seekers salary which offsets the business's costs of providing the necessary additional training to the employee. Job seekers and businesses must meet eligibility criteria.

Programs can often be combined to maximize the benefit to the employer. Other partner agency programs are listed on the www.tencocareercenter.com website.

<u>Sectors versus Non-Sectors</u>

The TENCO Workforce Development Board has established four sectors and one support sector which have high-demand, high-wage projections for the local area. Occupations within the sectors are analyzed annually. The sectors include:

- HealthCare,
- Manufacturing and Distribution,
- Skilled Trades,
- Logistics/Transportation
- Business/Support sectors

Additional sectors and occupations may be approved by the TENCO Workforce Development Board based upon economic changes.

Individuals seeking funding for occupational skills, support services, Incumbent Worker Training and/or On-the-Job Training must be in one of the sectors identified by the board. Transitional employment and youth work experiences may be in any sector.

Business Service Coordinators will assist the local Workforce Development Board with determining high demand occupations.

Service Delivery:

Outreach is a planned and well-prepared method of providing information about available services, while learning about the business. It is best practice for business service staff to carefully listen, and consider the specific needs of a company rather than relying on a list of services. Ask probing questions – have a focused dialogue – and be familiar with the company before you visit. Many companies have videos on YouTube, websites, Facebook pages, and other social media that will give the Business Service Coordinator insight into the company.

Possible Questions:

- Tell me about your company.
- What are your company's greatest strengths?
- What are the obstacles your company is facing?
- How can we help?

Customer service is vital. The business customer must feel you have the knowledge of their business and of the services available. Be professional, courteous, and follow business protocol. Research the business and sector before visiting.

Outreach is best conducted through in-person interaction, such as Chamber, Alliance, and/or Industrial Authority events. Business Service Team members should regularly attend and be involved in these organizations in their local area. Outreach can also be conducted through cold calls. These calls should be short and specific to the nature of the call, such as a quick introduction with a request to meet, learn about and tour their facility, or provide a specific service like a job order.

Job Orders and Quality Referrals

Taking a job order should be more than simply adding the job to the state database account. The job order should be detailed enough for Career Center and partner agency staff to make high quality job seeker referrals to businesses. All customers receiving a referral from the Career Center should have the employability skills necessary to obtain employment. Business Service Coordinators have a responsibility to do more than just place the job order. Job orders should be easily accessible to partner agencies, with direct interaction preferred to ensure partners are aware of the open employment opportunities. Business Service Coordinators should diligently work with all partners to make quality referrals to the business.

Quality Referrals

Job seekers who are served through the Kentucky Career Center may participate in self-service activities which require limited staff assistance. Job seekers should always be made aware of the intensive services available to them through the Career Center, such as meeting with a Business Service Coordinator on job opportunities in the local area. The Business Service Coordinator should be familiar with assessing an individual prior to making a referral for partner services and/or job opportunities. Assessments may include interest inventories, completing an application, and/or an interview. At a minimum, the Business Service Coordinator should learn the following:

- Past work history
- Past educational experience
- Barriers to employment (location, pay, childcare, transportation, disability/limitations, substance use, and/or offenses)
- Employment strengths
- Characteristics of the job the customer is seeking (1st shift, willing to travel outside of their area, income requirements, etc.)

After meeting with the customer, the Business Service Coordinator should utilize their knowledge of businesses in the local area and of partner services to refer the job seeker for additional assistance with a partner or refer directly to a business for employment.

Performance: Penetration and Retention

The Commonwealth of Kentucky has established two performance metrics that will be utilized to evaluate business service success.

Business penetration is used to determine if the local area provides adequate support and services to a wide variety of businesses and not focused solely on well-known established businesses. In order to calculate the percentage of TENCO businesses that have received services in a specific timeframe, you divide the number of registered businesses in the local area by the number of non-duplicated businesses served during that timeframe.

It is vital that Business Service Coordinators be aware of businesses in the local area. Coordinators should be prepared to learn about their local businesses and make contact, meet virtually or in-person, tour, and share information on services to any and/or all businesses possible. Business Service Coordinators should present themselves professionally and well-versed in the company. All information should be documented in KIBES.

Business retention is used to determine if businesses were satisfied with their service. It is the state's interpretation that a business pleased with their services will be a repeat customer. Therefore, the state collects data through KIBES that identifies the number of businesses served multiple times during the fiscal year divided by the number of businesses served during that time period.

Data will be collected by Board staff on a quarterly basis regarding business performance rates. The Board will determine a penetration and retention goal for the local area until such time the state negotiates a state rate.

The TENCO Workforce Development Board expects each Business Service Coordinator to be in contact with and provide a core or intensive service for a minimum of 50 individual businesses per quarter (starting July 1, 2024 unless the Direct Service Provider establishes an earlier timeframe). A list of businesses in each Coordinator's area will be provided via the Workforce Assistant Director.

Reports:

The following reports will be reviewed quarterly by the TENCO Workforce Development Board staff. While the TENCO Workforce Development Board will establish performance metrics for Fiscal Year 2025 (July 1, 2024 – June 30, 2025) the Direct Service Provider may establish metrics at any time.

A. # of businesses served during the quarter (business penetration)

B. # of businesses served per Business Service Coordinator

C. # of repeat businesses within a 12-month period (business retention)

D. # of repeat businesses within a 12-month period per Business Service Coordinator

E. # of Intensive Services provided (broken down by Business Service Coordinator)

F. # of Intensive Services provided in the TENCO sectors (broken down by Business Service Coordinator)

G. Funding Spent on Business Services activities and/or programs (OJT, Incumbent Worker, WEX, Outreach, events and projects, etc.). Expectations are for each Business Service Coordinator to establish one work-based learning project, such as an OJT, each fiscal year.

H. # of individuals participating in job fair, hiring events, and other business services as deemed appropriate. Business Service Coordinators are expected to facilitate, assist with, and/or be an active partner in a minimum of one job fair/hiring event each fiscal year.

I. Business Service satisfaction report at 90% or higher.

Follow-up:

Business Service Coordinators should conduct follow-up (within 45 days of providing a business service) to ensure the local area is meeting business customer's expectations and needs. If a business that utilized Career Center services has not used the service again within 6 months, another follow-up should be conducted with the business to see if additional assistance can be provided.

The goal should always be to evaluate how effective services were for the company. A business customer survey report should be generated.

Database:

Kentucky Integrated Business Engagement System (KIBES) is the tool used to manage business customer engagement as required by WIOA.

Multiple agencies use KIBES to document business services. It is a tool to ensure non-duplication of services, as well as share with the group activities that are happening in the area. All business interaction should be recorded in KIBES. KIBES allows you to choose whether the interaction was more informational or an intensive service. Business Service Coordinators should be well-versed in the definition of the different types of services available for selection to ensure accurate data is reported.

Communication:

TENCO utilizes a variety of methods to conduct outreach, share best practices, and highlight services. Individuals providing business services should take advantage of TENCO's Facebook, website, and other social media outlets such as Instagram and podcasts to provide up-to-date information highlighting local businesses, hiring events, and incentives/programs available to business customers.

Business Service staff should be involved in Chambers, Alliances, and other entities or events that focus on business needs in the community. Participation in these activities provides a great networking opportunity as well as a platform for presentations on services available. Business Service staff may be asked to participate in career days and/or other related activities at secondary schools. Staff should have knowledge and awareness that can be presented to groups that vary from students to professionals.

An official Business Service brochure and a Career Center brochure will be utilized. Any handouts and/or flyers developed by the business service staff shall be reviewed by management prior to being distributed. It is management's intent that all brochures and regularly distributed materials be professionally printed and utilized universally.

All materials distributed should be professional in design and be a positive representation of the Center and the TENCO Workforce Development Board. The TENCO Workforce Development Board has a subscription with Canva.org to create materials. If assistance is needed, please contact the management team.

Job Fair/Hiring Events:

Business Service Coordinators involved in job fairs and/or hiring events should maintain a list of attendees. Sign-in sheets should include contact information. Career Center staff should follow-up with attendees to offer additional services. Attendees who participate in additional career center services should be registered in KEE Suite, provided an activity, and a case note should be entered.

Job Seekers Enrolled in KEE Suite:

Job Seekers who utilize staff assisted Career Center services should be registered in KEE Suite. Career Center staff should actively case manage those job seekers registered in KEE Suite. Case management should include an assessment, job preparation services, job referrals, connection to partner services, and documentation of outcomes. Case notes should record assessment information, activities and services provided, employment and partner referrals, and outcomes. Case management should be a minimum of monthly. Career Center staff are responsible for case management of individuals they registered. Individuals who are registered but do not receive activities and/or services within 90 days will exit and move into follow-up.

Training:

In order to establish a professional presence when approaching businesses, it is imperative to have an in-depth understanding of the programs offered through TENCO WDB. Business service staff should be able to confidently explain requirements and benefits of each program and be able to identify how these programs can positively affect businesses. Business Service staff will be provided with multiple opportunities for training directly related to their job responsibilities. These trainings may be through membership in organizations such as SETA, NAWDP, Chambers, and Alliances. Training may also be provided via Partner Meetings, Partner Retreat, staff meetings, and Career Center trainings. Staff will be expected to complete fifteen hours in training each year. Training will be documented with the date, training topic, training title, and presenter. These logs will be maintained by the Direct Service Provider.

Asset Resource Mapping:

Asset mapping identifies resources in the community and provides the local Workforce Development Board with an inventory of key resources within their local service delivery area. For business service an asset map may include: incentive packages, expungement programs, adult education, OVR, WIOA, transportation services, chambers of commerce, Area Development Districts, business loans, entrepreneurship, upskill training opportunities, and etc.

Business Service Coordinators, along with Career Center staff, should be aware and have readily available information on the resources in their community.

Financial Resources:

Business Services that require financial support, such as payment for space, food, professionally printed materials, and/or outreach supplies should be directed to the Workforce Development Director for approval. WIOA has specific limitations on allowable purchases. Other avenues, such as Post-Secondary, Chamber or Business donation of resources should be attempted for items such as space and food, prior to requesting WIOA funding. There is not a set budget for Business Services; Therefore, all requests must be approved individually.

Resources:

I. Federal Bonding: https://tencocareercenter.com/about-us/business-services/kentuckys-federal-bonding-program/ or www.bonds4jobs.com

II. Apprenticeship: https://educationcabinet.ky.gov/Initiatives/apprenticeship/Pages/default.aspx

III. Work Opportunity Tax Credit: https://kcc.ky.gov/employer/Pages/Tax-Credits.aspx

IV. Referral Link: https://forms.gle/HFM71sWyo3zvrYGM6

V. Kynect: https://kynect.ky.gov/resources/s/?language=en_US

VI. Recovery: www.kentuckycomeback.com

VII. Resource Bank: https://kynect.ky.gov/s/?language=en_US

VIII. WIOA Policies/Guidance: www.tencocareercenter.com

IX. KY Stats – demographics and data on penetration and retention: https://kystats.ky.gov/Reports/Tableau/KWD_2022

General Procurement

Methods of Procurement:

Competitive – More than one source submits an offer and either a fixed price or cost-reimbursement contract is awarded to the responsible entity with the proposal most advantageous to the program with price and other factors considered.

Sealed Bids – Bids are publicly solicited and a firm fixed price contract is awarded to the bidder whose bid is the lowest in price.

Sole Source – Must be documented that competition is nonexistent or inadequate or the services provided are necessary immediately and competitive procurement would delay implementation.

Planning

The committee designated by the TENCO WDB to provide oversight of the RFP process is provided with guidance regarding the methods of procurement.

The committee determines the method of procurement.

The committee determines the roles and responsibilities of the project/program. A cost analysis, if necessary, is conducted.

Process for Competitive Procurement:

Request for Proposal (RFP) Publication:

The RFP will be issued for a period of 30 days.

RFP Approval

- Evaluation criteria for the proposal is established by the TENCO WDB.
- The RFP is approved by the Committee and the TENCO WDB.

Release and Evaluation

- RFP is released to the public through a bidders list which includes local, state, and national entities; newspapers; and on social media.
- A Bidder's Conference is conducted.
- Questions are submitted and answered by email to all parties in attendance to the bidder's meeting.
- Proposals are received and reviewed by the TENCO WDB staff to determine if the proposal is a reasonable and responsible bid.
- Committee is provided the documents necessary to review and evaluate the proposal.

- If less than two proposals are received, committee members will be provided with the documents nec essary to ensure the proposal meets the objectives and goals of the TENCO WDB.
- Recommendations will be presented to the TENCO WDB and/or Executive Committee of the board for approval/denial. Members of the Committee and/or Board must disclose any conflict of interest that they may have regarding the entity and/or proposal submitted and must refrain from voting and/or influencing other members votes.

Negotiation/Selection Phase

- Upon approval of the TENCO WDB, the selected bidder will be notified by board staff and a date for negotiations will be determined.
- Negotiations may include program, performance, and fiscal. Any items that significantly changes the p roposal will require board approval.
- Upon completion of the negotiation process, a contract will be established by TENCO WDB staff and signatures of all parties will be received.
- The contract will be executed.

Implementation Phase

- Delineation of roles and responsibilities of each party under this contract will be specified.
- Monitoring will be conducted annually, at a minimum, with technical assistance provided as needed and/or requested

Close-Out Phase

- Costs will be reconciled at the end of each fiscal year.
- Performance goals will be evaluated.
- Close-out documentation will be completed.

Sealed Bids:

Sealed bids will only be accepted when an adequate and realistic specification or purchase description is avai lable. It will require two or more bidders to compete for the award. The award can be made solely on price.

- Bids will be solicited from an adequate number of known suppliers through newspapers, a bidders list (if applicable), and social media.
- Solicitation of bids will be available from fourteen (14) through (30) days to ensure a sufficient response time.
- The TENCO WDB will ensure the description of services, roles of each entity, and performance expectations of the project and/or program are specific and detailed.
- All bids will be opened publicly by the Director of the Workforce Development and/or the TENCO WDB Chair.

- A firm, fixed price contract will be written to the lowest responsive and responsible bidder.
- The TENCO WDB may reject any and all bids if there is a sound documented reason.

Sole Source:

Non-competitive procurement is through solicitation of a proposal from only one source.

- The TENCO WDB and/or Administrative Entity for the TENCO WDB will establish a potential bidders list for the project, program, and/or service. If a list is unable to be established due to the item being available from only one provider, and/or only one bid is received after due diligence is made to ensure adequate awareness and availability to bid, Sole Source procurement may be used.
- Sole Source may also be used if competitive procurement will delay the project, program, and/or service in an emergency situation.
- The TENCO WDB must maintain documentation of the attempts to competitively procure and must document the reason for the sole source selection.

Protests, Appeals, and Disputes:

If a proposal is denied, a written appeal regarding the non-award of funds may be submitted within 10 calendar days of the date of the non-award notice. The appeal may include a request for reconsideration of funding. The written appeal shall be submitted to:

Director of Workforce Development

Buffalo Trace Area Development District

P.O. Box 460, Maysville, KY 41056

The Director will submit the appeal to the TENCO WDB/Executive Committee for consideration. A written decision will be provided to the applicant within 15 calendar days.

Further requests for appeals shall follow the TENCO WDB grievance procedures. Bidding organizations may request a copy of the grievance procedures available on the TENCO Career Center website – www.tencocareercenter.com

Conflict of Interest:

A conflict of interest occurs when an employee, officer, agent or member of his/her immediate family, partner, or organization which employs any of the parties indicated has a financial or other interest or personal benefit from a firm considered or contract issued.

The RFP will require bidders to disclose any real or apparent conflict of interest.

The TENCO WDB and committee members complete a disclosure form annually. Any member who has a conflict of interest shall not participate in the review, discussion, and/or approval/denial or any proposals.

No entity that drafts and/or develops the RFP shall be allowed to compete for the award.

Firewalls for Entities Serving More than one Role:

Entities that have been designated and/or selected to serve more than one role through multiple contracts shall maintain separate invoicing, timecodes, staff with separate job descriptions and provide other firewalls as requested outlining the separation of the two roles.

Record Retention:

Retention of procurement records will follow the Records Retention Policy. These records include: Documentation of Selection of the Procurement Method, advertising, bidders list, questions received, questions answered, the RFP, sign in sheet for bidders meeting, minutes of the review committee meeting, rating sheets, recommendations, minutes of the board selection and any reclusions, and documentation of any ineligibility or non-responsive bids. Records will be maintained with the Program Coordinator and/or placed in locked storage with content details recorded for easy access.

Sub-Grant Contracts:

All sub-grant contracts shall include detailed information on the following items:

- Contract Type
- Extensions/Amendments/Modification
- Terminations/Breach of Contract
- Conflict of Interest
- Disputes/Grievance Procedures
- Record Retention/Record Access
- Priority Provisions
- Equal Opportunity/Discrimination Clauses
- Reporting Requirements
- Outreach Distribution
- Copyrights
- Lobbying
- Performance
- Contract Compliance/Monitoring
- Purchasing/Inventory Records
- Standard of Conduct

- Confidentiality Standards
- Assurances and Certifications of Compliance
- Roles and Responsibilities of each party

One-Stop Operator Procurement

Background:

The Workforce Innovation and Opportunity Act requires local Workforce Development Boards (WDB) to use a competitive process for the selection of a One-Stop Operator. The One-Stop Operator must, at a minimum, coordinate the service delivery of required one-stop partners and service providers but may be assigned other responsibilities based on local board direction. One-Stop Operators may not provide the following: Convene system stakeholders to assist in the development of the local plan, prepare and submit local plans, be responsible for oversight of itself, manage or significantly participate in the competitive selection process for one-stop operators, select or terminate one-stop operators, career services and youth providers, negotiate local performance accountability measures, or develop and submit budget for activities of the Local WDB in the local area.

One-Stop Operators must be an entity (public, private, or non-profit) or a consortium of entities that include three or more core required partners.

Contracts developed as a result of this procurement will be a cost-reimbursement contract. Contracts will be established for one fiscal year, with an opportunity for three one-year renewal periods based upon performance, monitoring, and funding availability.

Process for Procurement:

Following guidance in 2 CFR 200.320, the method of procurement shall be competitive proposals with a cost-reimbursement contract awarded. Procurement by non-competitive proposals may be utilized if after solicitation of a number of sources, competition is determined inadequate.

In order to ensure an open, equitable, and transparent competitive process, the following will be utilized to inform the public of the publication of the Request for Proposal (RFP):

1. Individuals on a bidders list will be notified in writing of the solicitation for proposals. The bidders list will include local, state, and national entities.
2. A notification of the RFP release will be submitted to newspapers and social media platforms.
3. The RFP will be available on the Administrative Entity's website.
4. The RFP will be submitted to the Office of Employment and Training for inclusion on the State website and other distribution as they determine appropriate.

Timetable for One-Stop Operator RFP:

The RFP will be issued for a period of no less than thirty (30) days as outlined in the Training Employment and Guidance Letter 16-15.

Protests, Appeals, and Disputes:

If a proposal is denied, a written appeal regarding the non-award of funds may be

submitted within 10 calendar days of the date of the non-award notice. The appeal may include a request for reconsideration of funding. The written appeal

shall be submitted to:

Director of Workforce Development

Buffalo Trace Area Development District

P.O. Box 460

Maysville, KY 41056

After consideration by the Director, the written notice will be reviewed by the

WDB, or designated committee of the Board for consideration.

Further requests for appeals shall follow the TENCO WDB grievance procedures.

Bidding organizations may request a copy of the grievance procedures available on the

TENCO Career Center website – www.tencocareercenter.com

Conflict of Interest:

A conflict of interest occurs when an employee, officer, agent or member of his/her immediate family, partner, or organization which employs any of the parties indicated has a financial or other interest or personal benefit from a firm considered or contract issued.

The RFP will require bidders to disclose any real or apparent conflict of interest.

The TENCO WDB and committee members complete a disclosure form annually. Any member who has a conflict of interest shall not participate in the review, discussion, and/or approval/denial or any One-Stop Operator proposals.

No entity that drafts and/or develops the RFP shall be allowed to compete for the award.

Firewalls for Entities Serving More than one Role:

Entities that currently hold a contract for a different role shall not be given any unfair advantage in the competition for the One-Stop Operator contract.

Entities that have been designated and/or selected through a competitive procurement process to serve more than one of the following roles shall maintain job descriptions for each role which outlines the separation of duties and responsibilities.

- One Stop Operator

- Direct Service Provider
- Board Staff
- Fiscal Agent

Contracts are officially monitored annually by board staff. Monitoring staff will develop an evaluation which shall include specific questions regarding the separation of duties.

The One-Stop Operator role shall not hold a position of authority to hire, terminate, reprimand, or evaluate staff, or provide specific financial or programmatic program oversight to partners of the center.

Bidders:

The RFP shall include information regarding the evaluation process of each proposal received.

Phases of Procurement:

Planning

- The committee designated by the TENCO WDB to provide oversight of the RFP process is provided with guidance regarding the One-Stop Operator procurement.
- The committee determines the method of procurement.
- The committee determines the roles and responsibilities to be included in the RFP.
- Evaluation criteria for the proposal is established.
- A cost analysis, if necessary, is conducted.
- The RFP is reviewed by the Committee and approved, denied, or tabled.

Release and Evaluation

- Once approved, the RFP is released to the public through a variety of methods.
- A Bidder's Conference is conducted.
- Questions are submitted and answered by email to all parties in attendance to the bidder's meeting.
- Proposals are received and reviewed by the TENCO WDB staff to determine if the proposal is a reasonable and responsible bid.
- Committee is provided the documents necessary to review and evaluate the proposal.
- If less than two proposals are received, committee members will be provided with the documents necessary to ensure the proposal meets the objectives and goals of the TENCO WDB.
- Recommendations will be presented to the TENCO WDB and/or Executive Committee of the board for approval/denial. Members of the Committee and/or Board must disclose any conflict of interest in reviewing documents from the bidding entity and must refrain from voting and/or influencing other members votes.

Negotiation/Selection Phase

- Upon approval of the TENCO WDB, the selected bidder will be notified by board staff and a date for negotiations will be determined.
- Negotiations may include program, performance, and fiscal. Any items that significantly changes the proposal will require board approval.
- Upon completion of the negotiation process, a contract will be established by TENCO WDB staff and signatures of all parties will be received.
- The contract will be executed.

Implementation Phase

- Delineation of roles and responsibilities of each party under this contract will be specified.
- Monitoring will be conducted annually, at a minimum, with technical assistance provided as needed and/or requested.

Close-Out Phase

- Costs will be reconciled at the end of each fiscal year.
- Performance goals will be evaluated.
- Close-out documentation will be completed.

Record Retention:

Records will be maintained for a minimum of three years unless in litigation, claim, negotiations, or audit which shall extend the retention requirement indefinitely. The following records must be retained by WIOA administrative staff: Documentation of advertising, bidders list, questions received, questions answered, the RFP, sign in sheet for bidders meeting, minutes of the review committee meeting, rating sheets, recommendations, minutes of the board selection and any reclusions, and documentation of any ineligibility or non-responsive bids.