



**Workforce Development Board
Executive Committee
1000 Emeline Ave., Santa Cruz
Wednesday, May 8, 2019, 8:30 a.m.**

18 W. Beach Street
Watsonville, CA 95076
(831) 763-8900
www.santacruzwb.com

Agenda

- I. Call to Order/Welcome**
- II. Public Comment**
- III. Approval of Minutes from March 6, 2019 meeting2-6**
- IV. Consent Items**
 - C.1 Strategic Plan Report Update.....**7-8**
 - C.2 AJCC Hallmarks of Excellence Action Plan Update**9-11**
 - C.3 Proposed PY 19/20 Budget, Re-cont. updates/changes**12-13**
 - C.4 Local Monitoring Reports**14-47**
 - C.5 Affiliate AJCC Certification**48-49**
 - C.6 Proposed PY 2019/20 WDB Meeting Calendar**50-51**
- V. Administration**
 - A.1 Data Dashboard Metrics Review**52-53**
 - A.2 WIOA Policies Update**54-84**
 - A.3 NAWB 2019 Conference Update.....**85**
 - A.4 2019-20 Officer Nomination Committee**86**
 - A.5 WDB Member Recruitment Update**87**
 - A.6 WDB May 29, 2019 Meeting Planning.....**88**
 - A.7 Career Center Update**89**
- VI. Chairperson's Report**
- VII. Adjournment**

MEMBERS:

Carol Siegel, Chair
Santa Cruz Seaside Company

Rob Morse, Vice Chair
Pacific Gas and Electric Company

Alia Ayyad, Director
Center for Employment Training

Diane Berry-Wahrer, Supervisor
California Department of Rehabilitation

Katie Borges, Director of Human Resources
Palo Alto Medical Foundation

Christina Cuevas, Program Director
Community Foundation of Santa Cruz County

Maria Elena De La Garza, Executive Director
Community Action Board

Marshall Delk, Vice President
Santa Cruz County Bank

Elyse Destout, Owner
Photography by Elyse Destout

Yuko Duckworth, Employment Program Manager
Employment Development Department

Candice Elliott, HR Director
Glass Jar Company

Andy Hartmann, Business Manager/Financial Secretary
IBEW Union, Local 234

Sean Hebard
Carpenters Local 505

Mark Hodges, Director, Regional Occupational Program
Santa Cruz County Office of Education

Todd Livingstone, Assistant Director Career and Technical Education
Watsonville/Aptos Adult Education

Barbara Mason, Economic Development Coordinator
Santa Cruz County Economic Development

Bryce Root, Founder
The Root Group

Francisco Rodriguez, President
PVFT Union, Local 1936

Shaz Roth, President/CEO
Pajaro Valley Chamber of Commerce and Agriculture

Glen Schaller, Political Coordinator
Monterey Bay Central Labor Council, AFL-CIO

Dustin Vereker, Chief Beer Ambassador
Discretion Brewing

DIRECTOR:
Andy Stone

**Next Meeting: Workforce Development Board Meeting
Wednesday, May 29, 2019 @ 8:30 a.m.
Seacliff Inn – Seacliff Room
7500 Old Dominion Court
Aptos, CA 95003**

**Executive Committee Meeting
TBD @ 8:30 a.m.**



**Workforce Development Board
Executive Committee
1000 Emeline Ave., Santa Cruz
Wednesday, March 6, 2019, 8:30 a.m.**

18 W. Beach Street
Watsonville, CA 95076
(831) 763-8900
www.santacruzwb.com

The Chair called the meeting to order at 8:30 a.m., and a quorum was established.

Committee Members in Attendance

Delk, Marshall
Destout, Elyse
Morse, Rob – Vice Chair
Siegel, Carol – Chair
Slack, Ron

Committee Members Absent

Andy Hartmann

Staff in Attendance

Chevalier, Katy – WTW Program Manager
Gazza, Laurel – WDB Administrative Aide
Gray, Lacie – WDB Sr. Analyst
Paz-Nethercutt, Sara – WDB Sr. Analyst
Stone, Andy – WDB Director

Guests

Winter, Amanda – Eckerd Connects

Subject: Public Comment

There was no public comment.

MEMBERS:

Carol Siegel, Chair
Santa Cruz Seaside Company
Rob Morse, Vice Chair
Pacific Gas and Electric Company
Alia Ayyad, Director
Center for Employment Training
Diane Berry-Wahrer, Supervisor
California Department of Rehabilitation
Todd Livingstone, Assistant Director
Career and Technical Education
Watsonville/Aptos Adult Education
Christina Cuevas, Program Director
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Elyse Destout, Owner
Photography by Elyse Destout
Yuko Duckworth,
Employment Program Manager
Employment Development Department
Candice Elliott, Principal Consultant
Fortress and Fluorish
Andy Hartmann, Business Manager/
Financial Secretary
IBEW Union, Local 234
Sean Hebard
Carpenters Local 505
Mark Hodges, Director,
Regional Occupational Program
Santa Cruz County Office of Education
Katie Borges, Human Resources Director
Palo Alto Medical Foundation
Barbara Mason,
Economic Development Coordinator
Santa Cruz County Economic Development
Francisco Rodriguez, President
PVFT Union, Local 1936
Glen Schaller, Political Coordinator
Monterey Bay Central Labor Council, AFL-CIO
Ron Slack, Owner
Fine Print Graphic Design
Shaz Roth, Executive Director & CEO
Pajaro Valley Chamber of Commerce
Dustin Vereker, Chief Beer Ambassador
Discretion Brewing Company
DIRECTOR:
Andy Stone

Subject: Approval of November 14, 2018 Meeting Minutes

Action: It was moved to approve the November 14, 2018 Meeting Minutes.

Status: Motion to Approve: Marshall Delk
Motion Seconded: Rob Morse
Abstentions: None
Committee Action: All in favor, motion passed.

Subject: IV. Consent Items:

C.1 – Data Dashboard
C.2 – WIOA Financial Performance PY 2018/19 Quarter 2
C.3 – AJCC Hallmarks of Excellence Action Plan Update
C.4 – Proposed PY 19/20 Budget, Re-Contracting
C.5 – Annual Report to the Board of Supervisors

Action: It was moved to approve the Consent Agenda

Status: Motion to Approve: Ron Slack
Motion Seconded: Marshall Delk
Abstentions: None
Committee Action: All in favor, motion passed.

Subject: V. Administration Items:

A.1 – Strategic Plan Report

WDB Director Andy Stone laid out the pathways for each of the 4 goals of the Strategic Plan Status Report and

Action: It was moved to accept the WDB Directors' Operational Plan update for the PY 18-19.

Status: Motion to Approve: Marshall Delk
Motion Seconded: Rob Morse
Abstentions: None
Committee Action: All in favor, motion passed.

A.2– WDB Officer Nominations PY 2019-20

WDB Director Andy Stone noted that it was time to convene a nominating committee for the PY 2019-20 WDB Officer nominations. Committee member Ron Slack volunteered to convene the nominating committee members.

Action: It was moved to develop a WDB Officer Nominating Committee and develop a slate of candidates for election at the WDB's May 29, 2019 meeting.

Status: Motion to Approve: Marshall Delk
Motion Seconded: Rob Morse
Abstentions: None
Committee Action: All in favor, motion passed.

A.3– Approval of WIOA Local Plan Update

WDB Senior Analyst Lacie Gray recapped the update that was made to the local WIOA Plan and stated that it would go to the Board of Supervisors by May 14, 2019. She also stated that no public comments were received on the plan update, which had been posted for a 30-day period.

Action: It was moved to accept the WIOA Local Plan Update and that the Plan be sent to the State and the Santa Cruz County Supervisors, in accordance with the applicable requirements.

Status: Motion to Approve: Ron Slack
Motion Seconded: Rob Morse
Abstentions: None
Committee Action: All in favor, motion passed.

A.4 – Approval of WIOA Regional Plan Update

WDB Director Andy Stone went over key points of the Regional Plan Update and noted that one of the key focus areas was Prison to Employment.

Action: It was moved to open the floor to the public regarding the Coastal Regional Plan, to send a summary of any discussion about the Plan, received today, to the Monterey County WDB to be integrated into the Plan as appropriate, and it was moved that the Plan be sent to the State and Santa Cruz County Board of Supervisors in accordance with the applicable requirements.

Status: Motion to Approve: Ron Slack
Motion Seconded: Elyse Destout
Abstentions: None
Committee Action: All in favor, motion passed.

A.5 – WDB Member Recruitment Update

Director Andy Stone noted that he had reached out to Carmen of Pajaro CDC to become a Board member. He and Chair Carol Siegel also discussed the need to focus on agricultural and tech industry members. It was noted that there were currently 4 business sector vacancies on the Board.

Action: It was moved to accept the WDB Member Recruitment Update.

Status: Motion to Approve: Marshall Delk
Motion Seconded: Rob Morse
Abstentions: None
Committee Action: All in favor, motion passed.

A.6 – March 27, 2019 Full Board meeting planning

Director Andy Stone stated that a presenter was lined up already for the March 27, 2019 full board meeting. Chair Carol Siegel mentioned that she wanted to continue to hear from Board members about their individual businesses as part of the meeting process. Board members discussed possible members to invite to give presentations on their businesses and it was also suggested that a slate of standard questions be developed. Board members attending the NAWB 2019 Conference also agreed to present on the highlights of the conference.

Action: It was moved to direct that the WDB staff include the items discussed above in the March 27, 2019 WDB meeting agenda.

Status: Motion to Approve: Ron Slack
Motion Seconded: Rob Morse
Abstentions: None
Committee Action: All in favor, motion passed.

VI. Chairperson's Report

No report was given, but Chair Carol Siegel thanked everyone for attending. Ron Slack also mentioned several upcoming charitable events that he wanted to invite the committee and Board to attend in the upcoming months.

Meeting adjourned at 9:40 a.m.

**Next Meeting: Executive Committee Meeting
Wednesday, May8, 2019 @ 8:30 am
1000 Emeline Ave., Santa Cruz**

**Workforce Development Board Meeting
Wednesday, March 27, 2019 @ 8:30 a.m.
Best Western Seacliff Inn
7500 Old Dominion Ct.
Aptos, CA 95003**



☒ Action ☐ Consent ☐ Information ☐ Discussion

C.1 Strategic Plan Report

COMMITTEE:	Executive Committee	MEETING DATE:	May 8, 2019
STAFF NAME: Andy Stone, WDB Director			

SUMMARY:

On September 11, 2018 the WDB approved the WDB Director's Program Year (PY) 2018-19 Operational Plan which lays out the specific actions for the program year designed to ensure that the Strategic Plan's goals are met. The attached scorecard represents the updated PY 2018-19 outcomes for the approved goals and action steps.

Both the Strategic Plan and the WDB Director's Operational Plan incorporate the Strategic Goals referenced below.

Strategic Goals for Workforce Santa Cruz County

Goal 1: Increase effectiveness of local and regional workforce development system to better meet job seekers, business and community needs

Goal 2: Align workforce development strategies to support local economic development

Goal 3: Develop strategic relationships with educators, employers and community partners to:

- Increase the skill levels of youth and adult job seekers, and
- Create opportunities for employment, career mobility, and self-sufficiency

Goal 4: Increase Board (WDB) Effectiveness





☒ Attachment(s)


SUGGESTED MOTION: (if applicable)


I move to accept the WDB Director's Operational Plan update for PY 18-19.

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:

**C.1 Attachment - Workforce Development Board of Santa Cruz County
STRATEGIC PLAN STATUS REPORT Program Year (PY) 2018-2019**

	<i>Status</i>	<i>2018-19 Target</i>	<i>2018-19 Operational Goals to meet Target</i>	<i>YTD</i>
<u>Goal 1</u> Increase effectiveness of local and regional workforce development system to better meet job seekers, business and community needs		Deliver three WDB approved projects	<ul style="list-style-type: none"> • Deliver First Community Health Worker Training @ Cabrillo (Slingshot) • Provide A New Cohort of Apprenticeship Readiness Training • Develop a Marketing Campaign to Promote Regional Health Care Careers (Slingshot) 	<p>Slingshot: Cabrillo College launched CHW training in January 2019</p> <p>Apprenticeship Readiness: Ten students graduated January, 8 2019</p> <p>Slingshot: Developed health career brochures for career centers</p> <p>Additional Projects: CalWORKs/WIOA dual enrollments, Lean Initiative, and Prison to Employment Initiative</p>
<u>Goal 2</u> Align workforce development strategies to support local economic development		Partner with economic development to help employers attract and retain talent	<ul style="list-style-type: none"> • Launch Pilot Incumbent Worker Training Program • Partner with Economic Development to Convene Hospitality/Tourism Sector and Develop Impact Report 	<p>Incumbent Worker Training: New policy approved by Business Services/CEDS Committee. New program set to launch July 1, 2019</p> <p>Hospitality/Tourism Project: BW Research was selected. Presentation scheduled for June 27</p>
<u>Goal 3</u> Develop strategic relationships with educators, employers and community partners to: <ul style="list-style-type: none"> • Increase the skill levels of youth and adult job seekers, and • Create opportunities for employment, career mobility, and self-sufficiency 		Identify In-Demand Career Pathways	<ul style="list-style-type: none"> • Develop New Career Pathways Report and Align Scholarship Opportunities 	<p>Career Pathways: CAEL selected for Tech & Child Care Worker Career Pathways. Due 6/30.</p>
<u>Goal 4</u> Increase Board (WDB) Effectiveness		Establish the WDB as Workforce Development Experts	<ul style="list-style-type: none"> • Provide Development Opportunities for Every WDB Member • Identify and Track New WDB Priority Metrics 	<p>Development Opportunities: Secured speakers for WDB meetings. Developed new board member orientation.</p> <p>New Metrics: Metrics reviewed with each committee.</p>

 on track to meet planned target for the year

 not on track to meet planned target for the year



C.2 Hallmarks of Excellence Plan Update

COMMITTEE:	Executive Committee	MEETING DATE:	May 8, 2019
STAFF NAME: Andy Stone, WDB Director; Sara Paz-Nethercutt, Sr. Analyst			

SUMMARY:

On September 11, 2018, the WDB approved the Hallmarks of Excellence AJCC Certification Action Plan. As a reminder, the certification areas and comprehensive AJCC rankings are listed below:

1. Physical location: 4
2. Universal access: 2
3. Partnerships: 3
4. Customer-centered services: 2
5. Targeted regional sectors and pathways: 2
6. Business services: 4
7. Cross-trained staff: 3
8. Data driven continuous improvements: 3

Currently, our local area has not attained the Hallmarks of Excellence certification and a recommendation was approved to have the local area focus on the areas underlined above to improve and attain a satisfactory ranking. The attached action plan represents the updated PY 2018-19 progress for your committee review.

☒ Attachment(s)

SUGGESTED MOTION: (if applicable)

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:

Hallmark of Excellence	Continuous Improvement Goals and Recommendations	Ranking	PY 18/19 Target Action	YTD Progress
1. The AJCC physical location and facility enhances the customer experience	<ul style="list-style-type: none"> Develop better signage, including coming into compliance with requirements for AJCC branding. Develop a plan for additional outreach and advertising measures, including for workshops and recruiting events. Ensure that the calendar of events is available online. 	4	<ul style="list-style-type: none"> Develop better building signage, including coming into compliance with requirements for AJCC branding. Develop a plan for additional outreach and advertising. 	<input checked="" type="checkbox"/> AJCC signage purchase order in development and decals from EDD
2. The AJCC ensures universal access, with an emphasis on individuals with barriers to employment	<ul style="list-style-type: none"> Develop a staff training plan which includes how to serve individuals with barriers to employment, such as veterans, people with disabilities, and those who are basic skills deficient. Include staff and partner input as to where they would benefit from training. Ensure that staff receive each of the above training components on a regular cycle (frequency TBD, but at a minimum annually). Develop a plan to enhance programmatic accessibility, including leveraging the use of technology (to offer virtual services) and assistive devices/alternate mediums. 	2	<ul style="list-style-type: none"> Develop a capacity building/training plan. Develop a plan to enhance programmatic accessibility. 	<input checked="" type="checkbox"/> Discussed at 2/5/19 Career Center Operators meeting: Training opportunity through CWA CTI for working with individuals with barriers to employment using Social Policy Research Assoc. (SPRA) scheduled for 5/30/2019
3. The AJCC actively supports the One-Stop system through effective partnerships	<ul style="list-style-type: none"> Develop and execute a training plan for line staff (including partners) on each partner's programs, services, and eligibility requirements. Develop a plan for line staff to have regular opportunities to meet across organizations, possibly through the Roundtables that were mentioned or through a One Stop Steering Committee. Complete the Integrated Service Guide. 	3	<ul style="list-style-type: none"> Complete the Integrated Service Guide. Develop a capacity building/training plan. Develop a plan for staff to meet across organizations. 	Completed and disseminated the guide. <input checked="" type="checkbox"/> Monthly Roundtable Meetings planned for PY 18/19
4. The AJCC provides integrated, customer-centered services	<ul style="list-style-type: none"> Develop and execute a training plan for line staff (including partners) on each partner's programs, services, and eligibility requirements. Develop a plan for line staff to have regular opportunities to meet across organizations, possibly through the Roundtables that were mentioned or through a One Stop Steering Committee. Complete the Integrated Service Guide. 	2	<ul style="list-style-type: none"> Complete the Integrated Service Guide. Develop a capacity building/training plan. Develop a plan for staff to meet across organizations. 	Completed and disseminated the guide. <input checked="" type="checkbox"/> Monthly Roundtable Meetings planned for PY 18/19
5. The AJCC is an on-ramp for skill development and the attainment of industry-recognized credentials which	<ul style="list-style-type: none"> Provide staff training on labor market information (LMI), targeted sectors and career pathways – and how to use this information in working with 		<ul style="list-style-type: none"> Develop a capacity building/training plan. 	<input checked="" type="checkbox"/> Discussed at 2/5/19 Career Center Operators meeting:

meet the needs of targeted regional sectors and pathways.	customers. <ul style="list-style-type: none"> Ensure this training is on going and regular. Organize job center information/displays to include priority sectors and related information. 	2		Training opportunity through CWA CTI for LMI using Economic Modeling-Emsi scheduled for 6/5/2019
			<ul style="list-style-type: none"> Develop strategy for disseminating LMI to staff and the public. 	
			<ul style="list-style-type: none"> Train staff on how to access LMI and incorporate in their career coaching advising. 	
6. The AJCC actively engages industry and labor and supports regional sector strategies through an integrated business service strategy that focuses on quality jobs.	<ul style="list-style-type: none"> Examine the points at which business customer feedback is solicited and determine how this can be strengthened. 	4	<ul style="list-style-type: none"> Develop a plan for the utilization of customer feedback surveys. 	<input checked="" type="checkbox"/> Customer Survey in development
7. The AJCC has high-quality, well-informed, and cross-trained staffing	<ul style="list-style-type: none"> Develop a comprehensive capacity building/training plan for staff and partners. Complete the Integrated Service Guide 	3	Complete the Integrated Service Guide.	Completed and disseminated the guide
			Develop a capacity building/training plan.	<input checked="" type="checkbox"/> Monthly Roundtable Meetings planned for PY 18/19
8. The AJCC achieves business results through data-driven continuous improvement	<ul style="list-style-type: none"> Provide customer feedback forms in English and Spanish in the AJCC, as well as a box for returning completed forms. Explore other points at which customer feedback may be solicited; for example after workshops or for business customers, after recruiting events. 	3	Install a comment box in the Resource Room.	Installed comment box in Resource Room
			Develop a plan for the utilization of customer feedback surveys.	<input checked="" type="checkbox"/> Customer Survey in development

Note: In order to receive a Hallmarks of Excellence AJCC Certification, an AJCC must receive a ranking of at least 3 in each of the eight Hallmarks.

KEY	
<input checked="" type="checkbox"/>	on track to meet planned target for the year
<input checked="" type="checkbox"/>	in danger of not meeting target for the year.



C.3 Recontracting PY 19/20 WIOA Services

COMMITTEE:	Executive Committee	MEETING DATE:	May 8, 2019
STAFF NAME: Andy Stone, WDB Director; Belinda Barr, Business Services Manager			

SUMMARY:

The Workforce Innovation and Opportunity Act (WIOA) Business Services contract with Eckerd is currently in year one (1) of a potential four (4) year contract cycle from the last procurement award process. However, on April 3, 2019, Eckerd notified the WDB Director that it has elected not to renew its WIOA Business Services contract after June 30, 2019. As a result of Eckerd's decision, WDB staff recommend the following contract changes:

1. An additional \$25,000 allocated to Goodwill Central Coast (for a \$625,000 total contract) to provide Rapid Response services;
2. An additional \$25,000 allocated to County Office of Education (for a \$800,000 total contract) to provide Youth Work Experience services.

The Small Business Development Center's (SBDC) Layoff Aversion contract is scheduled to terminate on June 30, 2019. WDB staff recommended that the WIOA Layoff Aversion contract be renewed with SBDC.

On April 24, 2019, the Employment Development Department (EDD) released the Workforce Innovation and Opportunity Act (WIOA) Allocations for Program Year 2019-20 for the Adult, Dislocated Worker (DW), and Youth funding sources. It is anticipated that Santa Cruz County's overall allocation will be reduced by \$337,396, based on Program Year 2018-19 levels. The total amount of Eckerd's Program Year 18/19 contract was \$100,000 and the proposed changes will result in an anticipated cost savings of \$50,000. While this does not account for the entire reduction, WDB staff believe that there is still adequate funding to support the proposed contract amounts. Negotiations on the scope of work with the service goals and the budgets will be completed with services continuing as of July 1, 2019, according to the County's continuing contract agreements process.



☒ Attachment(s)

SUGGESTED MOTION: (if applicable)

I move to approve the proposed PY 19/20 contract renewal changes and direct staff to move forward with contract negotiations.

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:

C.3 Attachment 1
Re-Contracting PY 19/20
Workforce Service Providers

CONTRACTOR (PY 18/19)	Funding Source/ Services	Actual PY 18/19 Allocation	Recommended PY19/20 Allocation
Eckerd	Adult, Dislocated Worker, Rapid Response & Youth	\$100,000	\$25,000 – Goodwill (Rapid Response)
			\$25,000 – County Office of Education (Youth)
Small Business Development Center	Layoff Aversion	\$44,000	\$44,000 - SBDC



☒Action ☒Consent ☐Information ☐Discussion

C.4 WIOA Program Monitoring PY 2018-19

COMMITTEE:	Executive Committee	MEETING DATE:	May 8, 2019
STAFF NAME: Andy Stone, WDB Director; Sara Paz-Nethercutt, Sr. Analyst			

SUMMARY:

WDB Staff monitored the following contracted services in December 2018 and January 2019:

1. Goodwill Central Coast (GCC)
2. Cabrillo Student Resource & Support Network (SRSN)
3. Cabrillo Small Business Development Center (SBDC)
4. Santa Cruz County Office of Education (SCCOE)
5. Eckerd Youth Alternatives, Inc. (Eckerd Connects)

The monitoring includes the following:

- **Contract Questionnaire:** covers work environment, program and site accessibility, administrative requirements, staffing requirements, grievance, and program operations.
- **Financial Questionnaire:** covers fiscal management, program income, cost allocation, facilities and property, and audit.
- **Program Operations:** covers contractor specific operations, assessment, service delivery, and specific services.
- **Case File Review:** covers required WIOA service documentation of a sample percentage of randomly chosen participant files.
- **Participant Questionnaire:** asks about services and recommendations from the randomly chosen participants, services important to the customer, and overall satisfaction with services on a 1-10 scale.
- **Business/Employer Questionnaire:** asks about services, recommendations and overall satisfaction with services on a 1-10 scale.
- **Financial Sampling:** A fiscal sampling review was conducted by Edwin Ogu, HSD Accountant for all programs. This is an annual review of program fiscal records.

WDB staff next steps include the following:

- Implement the Corrective Action Plan as outlined (GCC, SBDC, SCCOE, SRSN, Eckerd)
- Apply the internal protocols as developed. (GCC, SBDC, SCCOE, SRSN, Eckerd)
- Review during contract negotiations for PY 19/20 (GCC, SBDC, SCCOE, SRSN, Eckerd)
- Review at the next annual monitoring visit. (GCC, SBDC, SCCOE, SRSN)

All five (5) complete drafted reports are attached.

☒Attachment(s)

SUGGESTED MOTION: (if applicable)

I move to approve the monitoring reports as drafted by WDB staff.

COMMITTEE DATE	04/24/19	COMMITTEE APPROVAL:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE		BOARD APPROVAL:	<input type="checkbox"/> Yes <input type="checkbox"/> No Other:

Service Provider: Goodwill Central Coast (GCC)

Workforce Investment Board Analyst: Sara Paz-Nethercutt, WDB Sr. Analyst
831.763.8756
Sara.Paz-Nethercutt@santacruzcounty.us

Monitoring Dates: On site January 7- 10, 2019, monitoring period concluded on February 19, 2019

Term of Contract: July 1, 2018 through June 30, 2019

Overview of Scope of Work

Contractor is the designated service provider for Adult and Dislocated Worker Workforce Innovation and Opportunity Act (WIOA) programs in the Career Center (One-Stop). WIOA services are offered at the full-service, comprehensive career center located at 18 West Beach Street in Watsonville and maintains staff office space in mid-county. Contractor provides Universal Services to the public in the Watsonville Career Center Resource Room.

Contractor is responsible for providing comprehensive services and activities to participants as required under WIOA regulations. These activities include client outreach/recruitment, eligibility determination, case management, access to training scholarships, supportive services, workshops, employment, and follow-up services, as well as data entry and report preparation as required in the approved WIOA automated case management system. WIOA services are branded as services of Workforce Santa Cruz County, a proud partner of the America's Job Center of California™ Network.

Contractor provides eligible customers with scholarships for a full range of training services by establishing an Individual Training Account (ITA). Customers choose training providers from the State Eligible Training Provider List (ETPL) and from those providers who have entered into an agreement with the Santa Cruz WDB. Contractor also offers On the Job Training(OJT) in the menu of services to WIOA eligible participants and develops OJT contracts with employers to achieve placement, retention, wage replacement, and training credentials.

Contractor uses the State CalJOBS system to register, enroll, and track the WIOA participants they serve and to provide the information needed to measure program outcomes.

The reference to *Contractor* is hereby used interchangeably with GCC to mean the same entity throughout report.

Current Findings and Recommendations The following represents one (1) finding that was identified:

Findings:	Corrective Action(s):
<p>1. Data Validation</p> <ul style="list-style-type: none"> a. Assessment documentation form was either missing the completion date or the document date didn't match the CalJOBS activity 102 code. This data validation error occurred in thirteen (13) of the twenty-four (24) case files reviewed, Contractor indicated the CalJOBS activity code 102, <i>Initial Assessment</i>, is documented by the completion of assessment form, "<i>Assessing Potential Participant Readiness and Assisting Them to make Employment and Training Decisions</i>." b. Participant (state # 1001873310)) was receiving a WIOA service per CalJOBS active (open) training activity (300), however, participant was not enrolled in a training program (had not registered for subsequent term. c. Supportive services activity claimed as a successful outcome in CalJOBS without documentation of any service provided. (state # 1002441815; 1001972913; 1001728761). No WIOA funds were used for supportive services in these instances. d. Participant (state #1001891933) Individual Employment Plan (IEP) was modified with out a modified training plan proposal on file. e. Participant (state#470847599) registered for WIOA funded services for Initial Assessment (CalJOBS activity 102) and the activity expired with no further WIOA services; CalJOBS system closed the case. <p>*Citation: Cal JOBS data validation: source documentation for activities tied to expenditures or required activities WSIN17-09, 9/29/17; 20 CFR 680.900 Supportive Services for adults and dislocated</p>	<ul style="list-style-type: none"> a. Provide written assurance that the documentation for the WIOA funded services match the CalJOBS activity code for that specific service. <p>Recommend Contractor revise its assessment form, "<i>Assessing Potential Participant Readiness and Assisting Them to make Employment and Training Decisions</i>" name and contents for simplicity and to ensure it meets the WIOA (CalJOBS) data validation requirements.</p> <ul style="list-style-type: none"> b. Provide written assurance that WIOA participants are registered for training in each term while receiving a WIOA funded service. c. Provide written assurance that successful outcomes will be claimed when the WIOA funded activity can be properly documented. Recommend internal protocol be developed to incorporate the local policy and process for authorizing supportive services. Refer to Monitoring reports from PY 16/17 and PY 17/18 for previous Supportive Services findings. d. Provide written assurance that IEP modifications will contain the appropriate documentation. e. Provide written assurance that WIOA funded services will be provided as needed and appropriate without a system closure.

workers, WIOA Supportive Services Policy 16-04 (local policy, WDB authorized 6/8/2016; 20 CFR 680.170 Individual Employment Plan;	
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Contractor Response: GCC Corrective Action Plan

Finding 1A:

- GCC hereby attaches a modified Initial Assessment form that has been simplified and implemented by staff.
- All GCC staff have been instructed to record the actual date of the Initial Assessment on the physical form, as well as in CalJOBS as soon as the formal Initial Assessment has taken place.
- All GCC staff have been trained on various options to keep cases active when the training start date is more than 90 days from the date of the Initial Assessment.

Finding 1B:

GCC has recommitted to more effective, frequent, and open communication with SRSN Cabrillo College in order to keep both parties consistently informed on shared participants. The following actions have also been taken:

- GCC staff and SRSN staff worked with Sara Paz-Nethercutt to improve the joint service flow for Cabrillo College students. The revised workflow has been completed and implemented.

Finding 1C:

All GCC staff were instructed to:

- Assess the need for supportive services in the amount of up to \$500;
- Ensure that the supportive services funding is spent appropriately;
- Close activity as "Successful Completion" if funds were used;
- Close activity as "Unsuccessful Completion" if funds were not used

Finding 1D:

A formal training document for the process of creating and modifying Individual Employment Plans (IEP) is currently being created and will be disseminated and followed by GCC staff to ensure appropriate documentation.

Finding 1E:

WDS Director posts a weekly report of cases closing in 30 days for all staff; Staff takes appropriate action regarding the cases assigned to them; WDS Director monitors this progress in order to avoid system closures.

Next steps:

- Submit the Corrective Action Plan as outlined
- Develop and apply the internal protocols as developed.
- Review during contract negotiations for PY 19/20
- Review at the next annual monitoring visit.

Recommendations (No response necessary):

1. It is recommended that Contractor provide written notification of any changes in service hours to WDB staff. (Scope of Work, page 4) Hours to the resource room coverage for December 31, 2018 were made without prior written notification.
2. It is recommended that Contractor Quality Assurance Coordinator be more involved in the review of the OJT claims to ensure accurate and timely OJT invoices. Staff should be more intricately involved to ensure invoices are not rejected for payment processing.

WDB Staff available for technical assistance to QA and GCC Fiscal staff to improve this process.

3. It is recommended that Contractor ensure staying within the contract budget line item for rent/occupancy (office space in mid-county). Contractor is at 70% expended in that line item with 50% of the year expended.
4. It is recommended that the Contractor review the Harry Dalhstrom, *Out of Debt* booklet provided and consider making it a part of the Financial Literacy Program Service toolkit.
5. It is recommended that the Contractor seek technical assistance for using the CalJOBS Individual Employment Plan (IEP) online tool. Using the online version rather than the paper version maintained in the case file would help reduce data validation errors and track any and all IEP modifications. Technical assistance is also needed to learn how to properly document an IEP modification (paper or online) with a CalJOBS activity.
6. It is recommended that the Contractor develop internal protocols:
 - a. To ensure a failure to register for Selective Service (eligibility) decision is properly documented as a CalJOBS case note entry.
 - b. To ensure an activity is created in CalJOBS within thirty (30) days of eligibility determination. (Scope of Work, page 5).
 - c. To ensure On the Job (OJT) invoicing is complete and accurate prior to submission for processing. OJT invoices are often rejected for incomplete monthly reports, inaccurate time cards and missing progress reports. GCC should consider using the Quality Assurance Coordinator as point person for compiling, reviewing and correcting prior to submission to WDB staff for processing.
 - d. To ensure self-employment wages are captured in follow-up contacts.

Observations (No response necessary):

1. Voucher transactions from October 2018 had not yet posted to the County Commit and Pay (CnP) system at the time of monitoring in January 2019.
2. The annual training allocation is not listed in the PY 18/19 contract. Consider changing or augmenting contract goals to include contract objectives for spending the training allocation in each of the funding sources (Adult, Dislocated Worker) since this contractor is primarily responsible for the expenditures.
3. GCC staff asks WIOA orientation attendees to sign-in and provide last four (4) digit of their social security number. This event is open to the public and is an information only event prior to eligibility determination. No WIOA enrollment is required at this point.
4. Eligible Training Provider List (ETPL) approved vendor (Santa Cruz County Career Technical Education Partnership (CTEP, formerly Regional Occupation Program (ROP)) does not include the required classroom supplies as training expenses in CalJOBS. This omission requires staff to provide the supplies as a supportive service limiting the expenses to the approved local supportive services policy amounts.

5. GCC is adding staff for the Capitola Career Center required a revision to the satellite Memorandum of Understanding. No update on when the staff will start employment.
6. Local WIOA pre-application paper form is no longer in use. It has been replaced with the CalJOBS online WIOA pre-application. Any reference to a local paper WIOA pre-application should be removed from all orientation packet information.

Contract Questionnaire: Completed as group interview with GCC workforce services staff.

Financial Questionnaire: Completed Justin Newport Kelly, GCC Grants Accountant.

Administrative Questionnaire: Completed by Anne Guthrie, GCC Vice President, Workforce Development Services, Shelby Mason, GCC Workforce Services Director and Carmen Goodwin, GCC Quality Assurance Coordinator.

Participant Interviews: Five (5) participants were interviewed via phone interview.

Entrance Conference conducted with Shelby Mason, GCC Workforce Services Director.

Exit Conference held on January 25, 2019 with Shelby Mason, GCC Workforce Services Director and Carmen Goodwin, GCC Quality Assurance Coordinator.

Planned versus Actual Performance/Expenditures:

The program year is 50% of the contract period completed (July- December). Ideally, the year to date actual performance goals should be in line with that percentage. The contractor has submitted invoices through the month of December 2018 and is 41.9% expended in the WIOA career center services contract; contractor is 44.2% expended in the Financial Literacy Program service purchase order.

PROGRAM PERFORMANCE BASED OUTCOMES

Program Year 18-19	Total	Adult	Dislocated Worker (DW)
Planned Number of Training Enrollments*	163	98	65
Actual as of 12/30/18	85	64	21
Percentage of Planned goal	52.1%	65%	32.3%
Training Completions (vocational certificates)	105	54	51
Actual as of 12/30/2018	51	35	16
Percentage of Planned goal	48.5%	64.8%	31.3%
Entered Employment	99	52	47
Actual as of 12/30/2018	41	32	9
Percentage of Planned goal	41.4%	61.5%	19.1%

PROGRAM EXPENDITURES

Program Year 18-19	Total	Adult	Dislocated Worker	Indirect Admin	Facilities Costs
Planned Operations Cost	\$600,000	\$269,318	\$269,318	\$53,863.60	\$7,500.40
Expended as of 12/30/2018 claims*	\$251,862.41	\$114,216.54	110,018.86	\$22,363.45	\$5,263.56
Percent Expended	41.9%	42.4%	40.8%	41.5%	70%

*Contractor submitted claims through December 2018

SERVICE PLAN FOR FINANCIAL LITERACY PROGRAM SERVICES

Program Year 18-19	Planned Total	Actual as of 12/30/2018	Percentage of Planned goal
Membership in Financial Literacy Program (enrolled via CalJOBS module)	30	15	50%
Individuals receiving counseling	60	19	31.6%
Active Referral Partnerships	15	22	146%
Workshops	12	3	25%

FINANCIAL LITERACY PROGRAM SERVICES PROGRAM EXPENDITURES

Program Year 18-19	Total
Planned Operations Cost	\$35,000
Expended as of 12/30/2018 claims*	\$15,473.97
Percent Expended	44.2%

*Contractor submitted claims through December 2018

File Review: Twenty-four (24) case files were randomly selected for file and service review. Issues noted as Findings or recommendations as appropriate.

Data validation Issues:

- Two (2) case files reviewed had participants that were receiving WIOA services without an active CalJOBS activity code. Both were corrected with an approved state Data Change Request (DCR). (ie. Expired activities with a system closure).
- One case file was missing the education plan for the Individual Employment Plan (IEP) modification; the CalJOBS activity for the training activity (300) did not match any document on file.

- One participant had an active CalJOBS training activity (300) and hadn't registered for classes for the subsequent term—was no longer enrolled in a training program.
- Three (3) case files showed Supportive services activity claimed as a successful outcome in CalJOBS without providing the actual service.

Other Issues

- Lack of case notes for participant contacts
- Selective Service failure to register manager review and approval was missing from case three (3) files—corrected during the monitoring period.
- Lack of first WIOA activity within 30 days of eligibility determination noted as a systemic issue that needs to be addressed
- Initial Assessment activity date in CalJOBS inconsistently matches the contractor assessment document, "*Assessing Potential Participant Readiness and Assisting Them to make Employment and Training Decisions*". Thirteen (13) case files had no date on the document or it didn't match the CalJOBS activity listed.

Data Change Request (DCR) program year history was reviewed and of the ten (10) DCRs submitted the monitoring determined:

- Case manager error 50%
- Collaboration with ETPL vendor error 30%
- Participant communication (lack of) which resulted in an error 20%

Participant Interview Results: Goodwill Central Coast staff was given a list of eleven (11) randomly selected participants for interviewing purposes. Only five (5) participants (45%) were interviewed as the contractor could not reach the four (4) for scheduling and the remaining two (2) did not respond to the monitors calls. The results are:

Satisfaction Scale of 1- 10 with 1 being Very Dissatisfied and 10 being Very Satisfied: The average participant response was 7.8.

- One participant indicated the program deserve 5 stars (out of 5) but would recommend more structure between the two contractors providing the services.
- One participant recommended staff develop a timeline handout to be provided at the WIOA Orientation event so customers are aware of expectations and how long each step can take.
- One participant believes the program design could be improved to eliminate the need for multiple case managers at different locations (i.e. Cabrillo student).
- All participants interviewed were grateful for the financial assistance for their training goals.

Fiscal Sampling Review Results:

A fiscal sampling review was conducted by Edwin Ogu, HSD Accountant. He reviewed accounting records and systems; cash management and payroll systems; internal audit controls; cost classification and allocation systems. No issues were identified in this review.

Administrative Questionnaire: Based on the review, the areas of concern are so noted as recommendations and findings with requests for corrective action plans.

Contract Questionnaire: Based on the review, the areas of concern are so noted as recommendations and findings with requests for corrective action plans.

Financial Questionnaire: Based on the interview responses, there is continued compliance in all areas and there are no major concerns.

Andy Stone
Director, Workforce Development Board
Human Services Department

Date

Service Provider: Cabrillo College – Student Resource and Support Network (SRSN)

Workforce Development Board Analyst: Sara Paz-Nethercutt, Senior Analyst
831.763.8756
Sara.Paz-Nethercutt@santacruzcounty.us

Monitoring Dates: On site: December 3-7, 2018, monitoring period concluded on February 13, 2019

Term of Contract: July 1, 2018 through June 30, 2019

Overview of Scope of Work:

Student Resource and Support Network (SRSN) provides support services for Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Worker eligible participants enrolled in training programs at Cabrillo College. After WIOA eligibility requirements have been met, participants meet with specialized academic counselors to create an Education Plan that specifies their degree and/or certificate objective and lists the sequence of required courses for all terms. SRSN program approves and processes training related Individual Training Account (ITA) expenditures, payment vouchers and reimbursement forms, tracks academic progress and enrollment levels, and records case management activities. The SRSN program ensures that students are informed about other college services they may need, and refers them for financial aid (Pell Grant, BOGW), student employment, tutoring, personal counseling, health services, Calfresh and other support services.

In the current program year (2018-2019), with a 12-month contract, SRSN has been contracted to provide services for 60 WIOA participants which includes 21 Adult and 16 Dislocated Worker participants, the remaining 23 participants were carried in (9 Adult; 14 DW) from previous program years.

Current Findings and Recommendations *SRSN did not provide a formal response and a written plan has been requested.*

Finding(s): The following represents findings that were identified:

Findings:	Corrective Action(s):
1. Participant (state # 1001873310) was enrolled in WIOA training activity in CalJOBS case management system without being enrolled with the training provider (Cabrillo College) for the term of classes.	1. Provide written protocol to ensure all students progress is tracked and develop a process for referring/ transferring the participant for other County WIOA services (other than training, ie. job search) when a student is not in

<p>Contractor failed to notify WIOA partner responsible for data entry about student dropping out of training program timely.</p> <p>*Citation: WIOA Contract PY 18/19, page 7, Case Management Resources, "...student not in good standing"</p>	<p>good standing.</p>
<p>2. FISCAL REVIEW:</p> <p>a. Approved employees' time cards/activity reports- During the WIOA fiscal monitoring, the monitor found that Personnel Activity Reports (PAR) or time study provided by the contractor for PY 17/18 Q2 and Q4, were not the bases entirely used to split employees' salaries and benefits to the different contracts. The PAR was used for some employees but was not used for some other employees. This resulted in different amount being charged to the contracts for salaries and benefits than should have been. Also, hours worked per the PAR differs from hours recorded in payroll as worked for each of the employees. This is a repeat finding</p> <p>b. Payroll fringe benefit charges- For benefits charges, the monitor found that Cabrillo SRSN used different amounts other than the amounts paid to the employees as the base for benefit charges that were split to the contracts for each of the employees. This is a repeat finding.</p> <p>c. Over charges in salaries and benefits cost charged to the contract for quarters 2 and 4, FY 17/18. Please see appendix 2 for details.</p> <p>Citation: 2 CFR 225 Cost Principles- formerly OMB Circular A-87, "the distribution of salaries and wages to awards must be supported by personnel activity reports."</p> <p>WIOA Cabrillo SRSN PY 17/18 Contract, Exhibit B, Financial Management Requirements, Clause 1. Financial Management System; Clause 5, Records; Clause 6. Documentation; Exhibit C, Scope of Work,</p>	<p>a. Provide written assurance that commencing FY 19/20, the distribution of all employees' salaries and benefits to contracts will be based and supported by PAR and the hours reported in the PAR should agree with the hours in payroll in compliance with 2 CFR 225 Cost Principles. Appendix 3 shows the difference between the hours reported by PAR and payroll. A sample of PAR is attached as appendix 1 to this report as a guide.</p> <p>b. Provide written assurance that commencing FY 19/20, the cost to Cabrillo SRSN for employee's fringe benefit (fringe benefit paid to employees) will be the base for charging benefits to the County on the SRSN contract. Please see note in appendix 2 for details.</p> <p>c. Cabrillo SRSN to make an adjustment to their quarter 3, FY 18/19 invoice for the over charges in quarters 2 and 4 FY 17/18 invoices, extrapolated for the year. The overcharge amount is found in appendix 2.</p>

V. Fiscal Provisions, paragraphs 6, 7, 8.	
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Next steps:

- Submit the Corrective Action Plan as outlined; Work with WDB staff and County Fiscal staff as appropriate on developing and implementing the corrective action plans as listed above;
- Develop and apply internal protocols as developed.
- Review during contract negotiations for PY 19/20
- Review at the next annual monitoring visit.

Recommendation(s) (No response necessary):

1. It is recommended that SRSN update their *WIOA Intake Appointment Checklist* to include a checkbox for a student referral to the WIOA Financial Literacy Program currently funded through local WIOA funds.
2. It is recommended that SRSN staff work with WDB analyst and contracted service provider for the Adult and Dislocated Worker program (Goodwill Central Coast) to review and update the *SRSN Operational Service Flow document*. This document is used as a tool for outlining roles and responsibilities between SRSN staff and the WIOA contracted service provider. Note: Meeting scheduled for February 13, 2019.
3. It is recommended that the Contractor develop internal protocols:
 - a. To ensure that the coordination of WIOA training funds and other grant assistance (i.e. Pell Grants) is well documented in the case file. Although the SRSN intake form contains a question pertaining to students' application for other grant sources, in six (6) of the twelve (12) case files reviewed by the monitor the question was either blank or "N/A" was entered. [20 CFR 680.230]. It is expected that the student answer "yes or no and the appropriate documentation for the response be contained in the case file. Furthermore, the Pell Grant status was difficult to ascertain from the case file screen shots without a "key or legend" to identify the eligibility status. [Note, related local monitoring finding from PY 16/17; recommendation from PY 17/18]
 - b. To ensure the necessary action is taken when a student drops or otherwise is no longer enrolled in college classes. The student is still eligible for other WIOA program service (i.e. job search). Both SRSN and WIOA contracted service provider staff would benefit from a written referral process. [page 7 of SRSN Scope of Work]

Observation(s) (No response necessary):

1. Cabrillo SRSN students who are enrolled as a WIOA participants are surveyed regularly for staff to obtain any and all changes relevant to their ongoing case management.

2. Although the County of Santa Cruz has an open purchase order with California Coast Uniforms, a WIOA participant opted to pay cash and seek reimbursement rather than tapping into the purchase order.
3. As per Cabrillo SRSN staff, the WIOA applicants struggle to find and complete the *WIOA Pre-application* in the state online workforce resource system, www.caljobs.ca.gov.
4. SRSN staff are aware of changes to a participants' WIOA case manager only if they log in to CalJOBS.

Interviews held with:

Contract/Staff Interview Questionnaire: Completed by the monitor based on an interview with Gina Sonsini, Program Specialist.

Financial Questionnaire: Completed by Violette Reeves, Cabrillo College Fiscal Services Analyst and Roy Purchio, Cabrillo College Business Services Fiscal Manager.

Administrative Questionnaire: Completed by Karen Reyes, Cabrillo College Director of SRSN.

Participant Interviews: Six (6) participants were randomly selected for an interview; Four (4) were interviewed on site, one (1) was interviewed by phone and the remaining one (1) could not be reached.

Entrance Conference conducted with Karen Reyes, Director of SRSN and Gina Sonsini, Program Specialist

Exit Conference conducted with Gina Sonsini, Program Specialist.

Planned versus Actual Performance and Expenditures:

NUMBER OF PARTICIPANTS

Program Year 18-19	TOTAL	Adult	Dislocated Worker
Carry-in from previous year	27	13	14

Note: Actual Adult carry-in number was slightly higher than projected number indicated at contract negotiation.

Program Year 18-19	Total New	Adult	Dislocated Worker
Planned new enrollments	37	21	16
Actual as of 12/30/2018	26	18	8
Percentage of Planned goal	70.2%	85.7%	50%

PROGRAM EXPENDITURES

Program Year 18-19	Total	Adult	Dislocated Worker
Planned Operations Cost	\$75,000	\$37,500	\$37,500
Expended as of 12/30/2018 invoice	\$32,055.24	\$16,027.60	\$16,027.64
Percent Expended	42.7%	42.7%	42.7%

Currently SRSN is at 42.7% expenditure level with claims submitted through December 2018, ideally, expenditure levels at that time of year should be approximately 50%. Although the contractor is slightly below expenditures for expected levels at this time of year, there are no concerns with the contractors claiming the contract allocation.

File Review:

Twelve (12) SRSN participant case files were randomly selected for file and service review. All, but one, case file issues were resolved during the monitoring visit. The remaining issue could not be resolved and is a finding as noted. Other case file issues are listed as recommendations and contractor is encouraged to create processes to avoid future findings.

Participant Interview Results:

Student Resource and Support Network was given a list of six (6) randomly selected participants for interviewing purposes. Five (5) were interviewed. Four (4) of the six were interviewed in person onsite and one (1) interview was conducted via phone. The remaining one (1) participant was called several times and messages left to call the monitor back but to no avail. The results are:

Satisfaction scale of 1 - 10 with 1 being “Very dissatisfied” and 10 “Very satisfied”:

The average response was 8.8.

- “Communication between WIOA partnering agencies could be improved when case managers are changed”.
- “Appreciate how simple the bookstore voucher process was for me.”
- “Thank you for the scholarship!”

Staff Interviews:

Gina Sonsini answered the questions during the monitoring. All information requested by the monitor was provided.

Fiscal Sampling Review Results:

A fiscal sampling review was conducted by Edwin Ogu, HSD Accountant. He reviewed accounting records and systems; cash management and payroll systems; internal audit

controls; cost classification and allocation systems for the period of October 2017 – October 2018. The issues found during the fiscal monitoring are so noted as Findings.

Administrative Questionnaire:

Based on the review, the areas of concern are so noted as recommendations and findings with corrective action plans in place.

Contract Questionnaire:

Based on the review, the areas of concern are so noted as recommendations and findings with corrective action plans in place.

Fiscal Questionnaire Results:

Based on the review, the areas of concern are so noted as recommendations and findings with a request for corrective action plans.

Andy Stone
Director, Workforce Development Board
Human Services Department

Date

Service Provider: Cabrillo College Small Business Development Center

Workforce Development Board Analyst: Sara Paz-Nethercutt, Senior Analyst
831.763.8756
Sara.Paz-Nethercutt@santacruzcounty.us

Monitoring Dates: On site: December 19, 2018; monitoring period concluded on February 13, 2019

Term of Contract: July 1, 2018 through June 30, 2019

Overview of Scope of Work:

Cabrillo College Central Coast Small Business Development Center (SBDC) provides assistance to employers that are either closing altogether or are planning to lay off workers. SBDC provides early intervention assistance to struggling businesses to preserve jobs that otherwise might be lost. Additionally, SBDC delivers technical assistance including operational analysis, increased profit earning strategies and general “business turnaround” assistance for the prevention of layoffs.

In the current program year (2018-2019), with a 12-month agreement, SBDC is contracted to provide assistance to 40 at-risk businesses, averting layoffs or retaining at least 60 jobs. The funding for this contract is completely allocated from the Workforce Development Board’s (WDB) Rapid Response funding stream.

Current Findings and Recommendations ***SBDC did not provide a formal response and a written plan has been requested.***

1. Fiscal Finding:	Corrective Action(s):
a. Approved employees’ time cards/activity reports- During the WIOA fiscal monitoring, the monitor found that Personnel Activity Reports (PAR) or time study provided by the contractor for PY 17/18 Q3 and PY 18/19 Q1, was not the bases used to split employees’ salaries and benefits to the different contracts. This resulted in different amount being charged to the contracts for salaries and benefits than should have been. Also, hours worked per the PAR differs from hours recorded in payroll as worked for each of the employees. This is a repeat finding.	a. Provide written assurance that commencing FY 19/20, the distribution of all employees’ salaries and benefits to contracts will be based and supported by PAR and the hours reported in the PAR should agree with the hours in payroll in compliance with 2 CFR 225 Cost Principles. Appendix 3 shows the difference between the hours reported by PAR and payroll. A sample of PAR is attached as appendix 1 to this report as a guide.
b. Payroll fringe benefit charges- For benefits charges, the monitor found that Cabrillo SBDC used different amounts other	b. Provide written assurance that commencing FY 19/20, the cost to Cabrillo SBDC for employee’s fringe benefit (fringe benefit paid

<p>than the amounts paid to the employees as the base for benefit charges that were split to the contracts for each of the employees. This is a repeat finding.</p> <p>c. Over charges in salaries and benefits cost charged to the contract for quarter 3, FY 17/18 and quarter 1, FY 18/19. Please see appendix for details.</p>	<p>to employees) will be the base for charging benefits to the County on the SBDC contract. Please see note in appendix 2 for details.</p> <p>c. Cabrillo SBDC to make an adjustment to their quarter 3, FY 18/19 invoice for the over charges in quarters 3 FY 17/18 and quarter 1, 18/19 invoices extrapolated for the year. The overcharge amount is found in appendix 2.</p>
<p>Citation: 2 CFR 225 Cost Principles- formerly OMB Circular A-87, “the distribution of salaries and wages to awards must be supported by personnel activity reports.”</p> <p>WIOA Cabrillo SBDC PY 18/19 Contract, Exhibit B, Financial Management Requirements, Clause 1. Financial Management System; Clause 5, Records; Clause 6. Documentation; Exhibit C, Scope of Work, V. Fiscal Provisions, paragraphs 6, 7, 8.</p>	

Next steps:

- Submit the Corrective Action Plan as outlined; Work with WDB staff and County Fiscal staff as appropriate on developing and implementing the corrective action plans as listed above;
- Review and implement during contract negotiations for PY 19/20, see Recommendation 1
- Review at the next annual monitoring visit.

Recommendation(s) (No response necessary):

1. It is recommended that SBDC create a specific layoff aversion intake form to assess the need for services through the WIOA layoff aversion contract. During the business interview portion of the monitoring, it was determined that the business(es) did not intend to layoff any employees. Per contractor, there was a discussion about the business struggle and being in danger of laying off employees. In PY 16/17, contractor incurred a finding, “Services provided to a business that did not meet the layoff aversion criteria under the contract” that they were able to justify. However, because this appears to be a recurring issue, a contract obligation is recommended that will include contractor documentation for every new at-risk business served and how the business meets the layoff aversion contract criteria.

Observations:

1. Current SBDC Director will be retiring in spring 2019.
2. SBDC survey criteria includes an email to new clients with five (5)+ hours of follow-up contact time approximately fifteen (15) days after the end of the quarter.

During the PY 2018/19 survey: 107 surveys were received; 97% of those surveyed:

- Rate the Business Advisor as good or excellent

- Would use the services again
- Would recommend the services to a friend or colleague.

Interviews held with:

Business Interviews: Monitor conducted three (3) phone interviews with local business owners who received services under this contract.

Satisfaction scale of 1 - 10 with 1 being “Very dissatisfied” and 10 “Very satisfied”:

The average response was 10.0.

- All three (3) business owners are considered part of the micro-enterprise community and were able to grow their business during the period that they received SBDC consultant assistance.
- None of the business owners recalled being informed of the “layoff aversion” assistance program at the beginning of their participation.

Staff Interview Questionnaire: Completed by the monitor based on an interview with Teresa Thomae, SBDC Director.

Contract Questionnaire: Completed by Teresa Thomae, SBDC Director.

Financial Questionnaire: Completed by Caryn Crawford, Cabrillo College Fiscal Services Analyst.

Administrative Questionnaire: Completed by Teresa Thomae, SBDC Director.

Entrance Conference conducted with Teresa Thomae, SBDC Director and Amy Nama, SBDC Administrative Assistant.

Exit Conference conducted with Teresa Thomae, SBDC Director, Amy Nama, SBDC Administrative Assistant; Belinda Barr, County Business Services manager.

Planned versus Actual Performance and Expenditures:

Currently SBDC is at 64.9% expenditure level with claims submitted through December 2018; expenditure levels at that time of year should be approximately 50%. Although the contractor is above expenditures for expected levels at this time of year, the contractor is fully aware of the expenditure limitations. Furthermore, they are fully aware of the expected maintenance of effort and will continue to provide services should they claim the allocated amount prior to years end. Quarterly programmatic goals are listed below and it is noted that the number of new at-risk business served for the second quarter is at 40% and is of concern for overall contractual objectives.

PROGRAM EXPENDITURES

Program Year 18-19	Total
Planned Operations Cost	\$44,000
Expended as of 12/31/2018 invoice	\$28,563.41
Percent Expended	64.9%

SERVICE PLAN TABLE

July 1, 2018- June 30, 2019 Performance Units	Planned Annual Total		Goal thru Q2 July – Dec 2018	Actual Thru Q2 PY 18/19	% of Actual/ Goal
Number of new at-risk businesses to be served	40		20	8	40%
Number of actual jobs retained/ Layoffs Averted	60		25	18	72%

Fiscal Sampling Review Results:

A fiscal sampling review was conducted by Edwin Ogu, HSD Accountant. He reviewed accounting records and systems; cash management and payroll systems; internal audit controls; cost classification and allocation systems for the period of October 2017 – October 2018. The issues found during the fiscal monitoring are so noted as Findings.

Administrative Questionnaire:

Based on the review, the areas of concern are so noted as findings and recommendations with corrective action plans in place.

Contract Questionnaire:

Based on the review, the areas of concern are so noted as findings and recommendations with corrective action plans in place.

Fiscal Questionnaire Results:

Based on the review, the areas of concern are so noted as recommendations and findings with a request for corrective action plans.

Andy Stone
Director, Workforce Development Board
Human Services Department

Date

11Service Provider: Santa Cruz County Office of Education; WIOA Youth Services – Sueños Program

Workforce Investment Board Analyst: Sara Paz-Nethercutt, WDB Sr. Analyst
831.763.8756
Sara.Paz-Nethercutt@santacruzcounty.us

Monitoring Dates: On site December 10- December 17, 2018; overall monitoring period concluded February 1, 2019

Term of Contract: July 1, 2018 through June 30, 2019

Overview of Scope of Work

The Contractor provides outreach/recruitment, intake, assessment, registration, development of the Individual Service Strategy (ISS)/Career Plan, case management and referral to other contracted and non-contracted service providers as needed to fulfill the requirements of the WIOA Youth program. Contractor provides access to the fourteen (14) elements under the WIOA Youth program. Target Youth are defined by regulation as young people between the ages of 16-24 and meet the definition of in-school or out-of-school (OSY) with certain barriers. Local policy further dictates youth must reside in Santa Cruz South County (zip codes: 95076, 95077 and 95019) with a 5% dispensation for other potential OSY located in Santa Cruz County.

The goal of youth programs under the WIOA is: 1) to develop the work, career pathways, potential educational attainment, and opportunity for skills training in in-demand industries and occupations for young people in the County of Santa Cruz to increase access to jobs, job retention and earnings, and helping employers with skilled workers; 2) build a comprehensive, high quality coordinated youth workforce development system that prepares youth for successful futures.

Current Findings and Recommendations The following represents one (1) finding that was identified:

Findings:	Corrective Action(s):
1. Data Validation a. Supportive Services activity code was not entered in CalJOBS for a WIOA funded activity. Participants (State ID #1002487303; 1001721022) were WIOA enrolled and received supportive services (transportation, fingerprinting/TB test) as a funded service	a. Provide written assurance that all enrolled WIOA participants who receive a WIOA funded activity, e.g. supportive services, incentive payments will have the corresponding CalJOBS activity code for State performance and

<p>without the proper corresponding CalJOBS activity code for State performance and financial data tracking purposes.</p> <p>*Citation: CalJOBS Data validation: source documentation for activities tied to expenditures or required activities; WIOA Sueños Contract Scope of Work;</p>	<p>financial data tracking purposes.</p> <p>NOTE: These all are allowable expenses with the corresponding documentation/activity code.</p>
<p>SCCOE Response:</p> <p>Accept the finding; recommendations and actions requested are underway.</p>	

Next steps:

- Work with WDB staff on developing and implementing the corrective action plans as listed above;
- Apply the internal protocols as developed;
- Review during contract negotiations for PY 19/20 to determine whether to modify contract language;
- Review at the next annual monitoring visit.

Recommendations (No response necessary):

1. It is recommended that Contractor provide all Sueños forms to contract analyst to upload to “Drop Box” for easy access and to ensure the most recent form is being used.
2. It is recommended that Contractor work closely with the County Business Services Manager and Contracted service provider, Eckerd staff, in Workforce Services for Business for developing WIOA Work Experience (WEX) sites. Contractor has a 20% WEX expenditure threshold and has been developing their own worksites or using past worksites for youth placement. The WEX site development is a contractual obligation for the Workforce Services for Business contracted service provider.
3. It is recommended that Contractor submit a request to the Workforce Development Board contract analyst for any modifications to budget line items or scope of work prior to change taking effect. (See observation 3)
4. It is recommended that Contractor create the activity in CalJOBS for incentive payments with a date range as follows:
Actual begin date: beginning date of first qualifying incentive activity
Actual end date: date the youth competed the qualifying incentive activity
5. It is recommended that Contractor create the supportive service activity in CalJOBS for TB tests and fingerprinting with a date range as follows:
Actual begin date: referral date/ date service was requested or approved

Actual end date: date the service/test was completed/administered

6. It is recommended that Contractor provide feedback on the Youth policies (incentive, supportive services and work experience) for WIOA revisions.
7. It is recommended that Contractor review the WIOA WEX program parameters and expectations for the element with each WEX site supervisor for every youth placement, including those WEX sites that have had multiple placements over years dating back to Workforce Investment Act (WIA) program.

Observations (No response necessary):

1. Sueños staff use CalJOBS activity code 433, Career Awareness when a youth participant engages in activities designed to *develop knowledge of the variety of careers* and CalJOBS activity code 434, Career Exploration when a youth participant has *selected an educational path and training, or job which fits their interests, skills and abilities*.
2. Case files were very well organized with a sectional checklist at each flap, however, the case file was not visually indefinable for the “in-school” and “out-of-school” designation.
3. Academy teacher funded through this grant allocation was on a leave of absence from August through December 2018, leaving a void for the *Hospitality Tourism and Customer Service Academy*. The academy is referenced in the contract for six (6) different program elements. The entire Sueños team acted as back up for providing the elements as needed.
4. Fingerprinting and TB testing documentation and proof of expenditure are filed with the monthly grant invoice but not in the case file. An appropriate CalJOBS activity code (Other, 485) is created for each expenditure. Results of each test are kept in the case file.

Contract Questionnaire: Completed as a roundtable by Sueños Project Staff: Nohemi Macias, Project Coordinator, Bea Munoz, Project Coordinator, Angelica Ruiz, Project Specialist, Sarai Zayas-Alavez, Work Experience Specialist, Selene Avila-Montes, Receptionist.

Financial Questionnaire: Completed by Nohemi Macias, Sueños Project Coordinator.

Administrative Questionnaire: Completed by Nohemi Macias, Sueños Project Coordinator.

Entrance Conference conducted with Michael Paynter, Student Services Division Director, Nohemi Macias, Sueños Project Coordinator and Beatriz Munoz, Sueños Project Coordinator.

Exit Conference conducted with Nohemi Macias, Sueños Project Coordinator and Beatriz Munoz, Sueños Project Coordinator.

Planned verses Actual Enrollments:

Program Year 18-19	Total	ISY	OSY
Planned Number of New Enrollments	35	10	25
Actual as of 12/30/18	25	14	11
Percentage of Planned goal	71.4%	140%	44%

Planned verses Actual Expenditures:

Program Year 18-19	Total	In-School	Out of School
Planned Operations Cost	\$775,000	\$193,750	\$581,250
Expended as of 12/30/2018 claims*	\$322,392	\$103,677.32	\$219,748.24
Percent Expended	41.6%	53.5%	37.8%

*Contractor submitted claims through December 30, 2018

Work Experience				
Program Year 18-19	TOTAL		Program Year 18-19	Work Experience (WEX)
Allocation Expended as of 12/30/2018 claims*	\$322,392		WEX Allocation	\$190,709
WEX expenditure (YTD)	\$103,684.66		WEX expenditure (YTD)	\$103,684.66
Percent Expended	32.1%		Percent Expended	54.3%

File Review: Fourteen (14) case files were randomly selected for file and service review. Some of the issues include the following:

Data validation Issues: Noted as Findings and/or Recommendations.

Other Issues

- Each supportive service requires its own unique activity code as per the CalJOBS activity dictionary (WSIN 17-09), however, Sueños staff should consider entering an activity date range to eliminate entering multiple activities of the same category and risking data validation issues when the actual activity date(s) doesn't/don't match the documentation.

Participant-Employer Interview Results: Of the fourteen (14) case files selected, seven (7) were randomly selected for an interview. Four (4) were interviewed onsite, one (1) was interviewed via phone, one (1) was not available for health reasons and one (1) did not show up for the scheduled onsite interview appointment. The results are:

Satisfaction Scale of 1- 10 with 1 being Very Dissatisfied and 10 being Very Satisfied: The average youth program participant response was 9.75.

- Youth participant commented to the monitor that the follow-up calls feel like staff is just calling to see how they're doing and if they're "doing ok".
- Youth suggested the Sueños program activities start earlier in the day to avoid any lag time between the time school gets out at 2:30 and the time Sueños starts much later in the afternoon. They could go straight from Sequoia High School to the Sueños activities.
- Youth credits Sueños with helping her get to a State University. She is currently in her third year.

Three (3) work experience employers were interviewed on site. Employers interviewed:

- Dr. Cari Moore, in-house optician
- Digital Nest, Assistant Program Director
- Kmart- Store manager

Fiscal Sampling Review Results:

A fiscal sampling review was conducted by Edwin Ogu, HSD Accountant. He reviewed accounting records and systems; cash management and payroll systems; internal audit controls; cost classification and allocation systems. No issues were identified in this review.

Administrative Questionnaire: Based on the review, the areas of concern are so noted as recommendations and findings with requests for corrective action plans.

Contract Questionnaire: Based on the review, the areas of concern are so noted as recommendations and findings with requests for corrective action plans.

Financial Questionnaire: Based on the interview responses, there is continued compliance in all areas and there are no major concerns.

Andy Stone
Director, Workforce Development Board
Human Services Department

Date

Service Provider: Eckerd Connects

Workforce Investment Board Analyst: Sara Paz-Nethercutt, WDB Sr. Analyst
831.763.8756
Sara.Paz-Nethercutt@santacruzcounty.us

Monitoring Dates: On site January 28- February 1, 2019, monitoring period concluded on February xx, 2019

Term of Contract: July 1, 2018 through June 30, 2019

Overview of Scope of Work

Contractor is the WIOA funded service provider for the following modalities:

Modality 1: Career Center Operator

Contractor is responsible for coordinating across one-stop partners and service providers and ensuring the implementation of partner responsibilities and contributions agreed upon in the One-Stop Partner Memorandum of Understanding (MOU) Phase I and II in full compliance with WIOA regulations. Contractor is also responsible for implementing the America's Job Center of California (AJCC) Hallmarks of Excellence Certification recommendations.

Modality 2: Workforce Services for Business

Contractor provides business outreach and rapid response services with a focus on meeting the needs of local businesses and job seekers through the services offered by Workforce Santa Cruz County. Contractor is responsible for coordinating the workforce services for business efforts with the WIOA Adult, Dislocated Worker and Youth service providers as well as all mandated partners as referenced in the WIOA partner MOU. Contractor is responsible for identifying and working closely with employers to become a work experience (WEX) site for WIOA Youth and an On-the-Job (OJT) placement for Adults and dislocated workers.

Current Findings, Contract Performance and Recommendations The following represents one (1) finding that was identified:

Findings: Workforce Services for Business	Corrective Action(s):
1. Contractual Obligation/Program Design a. Contractor failed to create and use a standardized needs assessment to identify business needs and track the number of employers utilizing Workforce	a. Provide written assurance that contractor will create a method for the needs assessment that will connect to tracking the number of employers utilizing Workforce Santa Cruz County services.

<p>Santa Cruz County services. During the monitoring period, contractor was unable to produce the needs assessment tool.</p> <p>Merriam-Webster online dictionary definition of utilize (verb), utilizing (gerund): make practical and effective use of, take advantage of, bring into service.</p> <p>Contractor networking with businesses is considered an exchange of basic information and establish a connection. It does not pass the test of making use of, making practical use of a service but rather it is a passive activity. The service plan category of <i>Businesses utilizing Workforce Santa Cruz County Services</i> is determined once the business “uses” or “takes advantage of” any one of the allowable WIOA business services and is linked to an appropriate CalJOBS activity code. Contractor can and should use as many CalJOBS activity codes as are relevant, however for contractual performance data, only those are considered “Utilizing” the services should be counted as such.</p> <p>b. Contractor failed to accurately track the number of businesses “utilizing” the Workforce Santa Cruz County services via CalJOBS. See page 6 of this report for detailed explanation/analysis of the CalJOBS activity codes.</p> <p>During the monitoring period, a random sampling was conducted, and contractor case notes failed to demonstrate the business as utilizing the workforce services for business as contractor claimed.</p> <p>*Citation: Independent Contractor Agreement (ICA), Exhibit C, Scope of Work, page 7, page 2</p>	<p>b. Provide written assurance that contractor will accurately track those businesses “utilizing” the Workforce Santa Cruz County services via CalJOBS.</p>
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Contract Performance: Workforce Services for Business	Corrective Action(s):
<p>Contractor has failed to meet the Q2 target objectives as follows:</p> <ul style="list-style-type: none"> work experience worksite development, 0 of 18 targeted= 0% on-the-job training (OJT) enrollments, 3 of 10 targeted= 30% <p>*Citation: Independent Contractor Agreement (ICA), Exhibit A, Section 6; Exhibit C, Scope of Work, page 8</p>	<p>County determines Contractor's performance to be unsatisfactory. Provide a written corrective action plan for meeting the annual contractual goals/numbers. Contractor not likely to meet performance goals and will fall short of the overall annual goals.</p>
<p>Eckerd Response:</p> <ul style="list-style-type: none"> a. Eckerd Connects developed a Business Needs Assessment and provided to Santa Cruz Workforce Development Board staff on April 9, 2019 for review and approval. Staff will utilize the form to document information gained from employers and enter appropriate CalJOBS codes in compliance with State and local CalJOBS direction. b. Staff will identify additional codes, as appropriate, to document all services provided to employers particularly during the initial employer meeting. Additionally, staff have received clarifying information regarding the use of codes E45, Work Experience Programs and E30, On the Job Training and will only use the aforementioned codes when a contract is in place and customer begins the activity. c. Staff continue business outreach efforts and communication with partner agencies to obtain referrals for OJT and Work Experience positions. Staff will continue to meet with employers to develop new worksites through the end of this contract. <p>As this contract will end June 30th, 2019, staff will work with WDB and other contracted agency staff to ensure employers have a contact person to provide a continuum of services.</p>	

Next steps:

- Submit the Corrective Action Plan as outlined by the date specified.
- Develop and apply the internal protocols as developed and as applicable for the remainder of the contract.

Recommendations (No response necessary):

- It is recommended that Contractor create a budget plan for the remainder of the year to demonstrate how the contract allocation will be fully expended. Contractor currently below expenditure thresholds as expected for this time of the program year (50% of the program year) is as follows:
 - Modality 1: 27% expended
 - Modality 2: 32.9% expended
- It is recommended that Contractor create or update marketing materials (e.g. OJT flyer) used to showcase business services available through Workforce Santa Cruz County.

Contractor can request technical assistance if resources are not available through Eckerd. [Modality 2]

3. It is recommended that Contractor revise the Rapid Response Orientation PowerPoint presentation in collaboration with the County Business Services manager to streamline the number and content of the slides and to include the correct contracted service provider names and eliminate those that are outside Santa Cruz County (Office for Employment Training). [Modality 2]
4. It is recommended that Contractor change the invoice line item from “advertising” to match the approved budget category of “outreach”. [Modality 1; Modality 2]
5. It is recommended that the Contractor develop internal protocols:
 - a. To ensure the OJT referral process to other contracted service provider is established as a procedure and streamlined as much as possible. [Modality 2]
 - b. To ensure an overall outreach strategy is adhered to for the program year. [Modality 2]
 - c. To ensure the proper use of employer activities/services CalJOBS activity codes (WSIN17-09) for documentation of contract planned services of “businesses utilizing Workforce Santa Cruz County” services. [Modality 2]
 - d. To ensure implementation of a quality control process as soon as possible to ensure program deliverables. [page 10 of Scope of Work) [Modality 1; Modality 2]

Observations (No response necessary):

1. Contractor has experienced staffing challenges; keeping in mind the contract start date was 7/1/2018, Business Services Manager was hired 8/6/2018; Career Center Operator was hired 10/29/2018; Business Services staff was hired on 1/3/2019, and the regional manager position has been vacant since 10/15/2018. [Modality 1; Modality 2]
2. County Business Services Manager facilitates a weekly business services meeting to have contractor provide an update on contractual administration and their coordination of activities for: Business outreach; WIOA Youth (Sueños) work experience worksite development; Rapid Response; On-the-Job Training enrollments; CalJOBS
3. Current local staff of three (3) are supervised remotely by Eckerd staff outside the state of California.
4. Eckerd Business Services staff for modality 2 are currently in dispute over the logistics for the WIOA Youth work experience (WEX) agreement used for the work sites.

Contract Questionnaire: Completed via interview with Suzanne Foran, Vice President of Operations, Eckerd Connects and the staff responsible for each modality; Modality 1,

Amanda Winter, Career Center Operator; Modality 2, Sharolynn Ullestad, Business Services Manager.

Financial Questionnaire: Completed by Suzanne Foran, Vice President of Operations, Eckerd Connects, Eckerd Youth Alternatives, Inc.

Administrative Questionnaire: Completed by Suzanne Foran, Vice President of Operations, Eckerd Connects, Eckerd Youth Alternatives, Inc.

Business Interviews: Three (3) businesses currently working with OJT participants were interviewed.

Entrance Conference conducted via phone with Suzanne Foran, Vice President of Operations, Eckerd Connects, Eckerd Youth Alternatives, Inc. and Belinda Barr, County Business Services Manager

Exit Conference conducted via phone with Suzanne Foran, Vice President of Operations, Eckerd Connects, Eckerd Youth Alternatives, Inc.

Planned versus Actual Performance/Expenditures:

The program year is 50% of the contract period completed (July- December). Ideally, the year to date actual performance goals should be in line with that percentage. The contractor has submitted invoices through the month of December 2018 and is 27.1% expended in Modality 1, WIOA Career Center Operator; and 32.9% expended in Modality 2, Workforce Services for Business. The contractor is significantly below expected levels at this time of the contract year and need to submit a corrective action plan for spending the program year allocation.

PROGRAM SERVICE PLAN/PROGRAM OBJECTIVES

Modality 1: Career Center Operator

Contract Deliverable	Status to Date
Career Center Operator (CCOps) Meetings	Contractor has facilitated two of the three meetings required to date.
Scheduling coverage between partners in the Career Center(s) to ensure that Career Center has adequate coverage.	Contractor implemented a group calendaring system using the "team up" link.
Use of universal referral process and completion of any/all revisions/updates as necessary and/or required.	Contractor using the CCOps meetings to revise the Universal Referral Form process.

Aligning referrals between partners	Contractor using the CCOPs meetings to work with WIOA mandated partners on referral system improvements.
Cross Training of Staff	Contractor working with WDB staff to develop training opportunities using California Workforce Association California Training Institute (CWA CTI).
Customer Satisfaction (both business and job seeker)	Contractor has submitted a work plan for developing a tool and launching a customer satisfaction survey.
Facilitate sharing of best practices/ Continual Improvement	Contractor hosting monthly staff Round Table meetings in January, February, March.
Partner Performance Measures	Will work with WDB staff to develop systems to access and/or gather partner performance data.

Modality 2: Workforce Services for Business

Program Year 18-19	YTD Total	Q1	Q2
Businesses Utilizing Incumbent Worker Training	0	0	0
Actual as of 12/30/18	0	0	0
Percentage of Planned goal	N/A	N/A	N/A
Businesses Utilizing Workforce Santa Cruz County Services*	74	28	46
Actual as of 12/30/2018	76	29	47
Percentage of Planned goal	102%	103%	102%
Work Experience Worksites	18	6	12
Actual as of 12/30/2018	0	0	0
Percentage of Planned goal	0%	0%	0%
On-the Job-Training Enrollments	10	4	6
Actual as of 12/30/2018	3	2	1
Percentage of Planned goal	30%	50%	16.7%

PROGRAM EXPENDITURES

Modality 1: Program Year 18-19	Total	Adult	Dislocated Worker	Youth
Planned Operations Cost	\$75,000	\$25,000	\$25,000	\$25,000
Expended as of 12/30/2018 claims*	\$20,327.35	\$9,710.46	\$5,857.41	\$4,759.48
Percent Expended	27.10%	38.8%	23.4%	19%

Modality 2: Program Year 18-19	Total	Adult	Dislocated Worker	Rapid Response	Youth
Planned Operations Cost	\$100,000	\$25,000	\$25,000	\$25,000	\$25,000
Expended as of 12/30/2018 claims*	\$32,924.96	\$9,698.17	\$9,577.82	\$6,775.33	\$6,873.64
Percent Expended	32.9%	38.7%	38.3%	27.1%	27.4%

*Contractor submitted claims through December 2018

CalJOBS Data Entry Review: [Modality 2]

Issues noted as Findings or recommendations as appropriate.

Data validation Issues:

- Discrepancy between the use of CalJOBS On-the-Job training code E30 (12) and the number of actual OJT contracts (3) through Q2 PY 18/19. Code is specific to contracts established.
- A random sampling of case note entries (Emp ID # 900746; 579143; 901801; 901805; 902686; 901808; 899209; 901873; 902575) indicates contractor erroneously counted contact with employers/businesses and deemed it appropriate for the service plan category of "*Businesses Utilizing Workforce Santa Cruz County Services*."

Other Issues: Contractor use of CalJOBS Activity Codes

Business services tracking in CalJOBS provides an opportunity for multiple activity codes for each employer.

Activity	Definition	# of occurrences Through Q2	Utilizing Workforce Santa Cruz County Services
CalJOBS Assistance (E03)	AJCC staff provided an employer with information regarding CalJOBS, <u>or assisted an employer with registering in CalJOBS</u>	5	Y
Job Fairs (code E21)	AJCC staff partnered with an appropriate entity within the community to present and/or participate in a job fair	37	Y

Job Identification Contact (code E22)	AJCC staff contacted a CalJOBS registered employer for available job postings	3	Y
Job Listing Assistance (code E23)	AJCC staff assisted a CalJOBS registered employer with filling out a job listing form, or AJCC staff completed a job order listing in CalJOBS on behalf of the employer.	3	Y
Job Referrals (E24)	AJCC staff advertised or referred an employer's CalJOBS job order to participants.	1	Y
Marketing Package (code E28)	AJCC staff provided an employer marketing materials containing information regarding <u>EDD services</u> . Materials could include, but are not limited to, DE forms, brochures geared towards the employer, Labor Market Information Fact Sheets, and flyer	39	N/A
On-the-Job Training (code E30)	AJCC staff established an on-the-job training contract with an employer.	12	Y Planned service
Targeted Recruitment (code E37)	AJCC staff coordinated a focused recruitment campaign for a new business venture, or a facility needing large number of specialized workers.	3	Y
Work Experience Programs (E45)	AJCC staff coordinated with an employer to provide a participant with a Work Experience Opportunity, and technical assistance throughout the life of the contract.	5	Y Planned service
Workforce Innovation and Opportunity Act (WIOA), (code E46)	AJCC staff <u>informed</u> an employer of available WIOA employer services that include, but are not limited to customized training, on-the-job training reimbursement assistance, and training subsidies.	53	N
Youth Employment Opportunities (code E48)	A Youth Employment Opportunity Program (<u>YEOP</u>) <u>Specialist</u> contacted an employer for the purposes of informing the employer about YEOP...	2	N/A
Employer Networking (code E60)	AJCC staff provided an employer with information regarding AJCC services in an effort <u>to establish a relationship</u> , or to maintain an existing relationship.	23	N
Follow-up with Employer on Employer Services (code E69)	AJCC staff contacted the employer <u>to determine if employer services</u> that were provided by the AJCC <u>were successful</u> .	11	N

Y= Yes, a utilization code; N= No, not an appropriate utilization code, but it is an activity tracking code; N/A= not part of WIOA contracted services.

Example of Contract Performance Utilization Codes not referenced above			# occurrences
E06	CalJOBS External Recruitment	...AJCC staff conducted recruitment efforts to locate qualified individuals....	0
E09	Employer Application IssuanceAJCC staff issued the employer's work application to job seekers.....	0

E15	Exclusive Hiring Agreement	AJCC staff established an agreement that requires all job seekers to apply through CalJOBS.	0
E18	High Density Unemployment Area Resident	AJCC staff assisted an employer in hiring a high-density unemployment area resident.	0
E19	Internship	AJCC staff entered an internship into CalJOBS for an employer or publicized the internship at the AJCC.	0
E25	Job Shadowing	AJCC staff coordinated a job shadowing experience for a qualified participant with an employer.	0
E32	Rapid Response	AJCC staff provided rapid response activities in the case of a permanent closure or mass layoff.....	4
E34	Reverse Referral Agreement	AJCC staff established an agreement with an employer that it would provide a handout or poster to encourage job seekers to enroll and enter a resume in CalJOBS.	0
E35	Resume Referral	AJCC staff conducted a resume search to find job seeking participants resumes that match an employer's job requirements, and provided those resumes to the employer.	1
E44	Welfare Recipient Hiring	AJCC or staff assisted an employer in hiring a welfare recipient.	0
E51	CalJOBS suppressed Job Listing Referral	AJCC staff entered a suppressed job listing into CalJOBS, and assisted the employer in filling the opening.....	0
E54	Lay-Off Aversion Activities	AJCC staff provided lay-off aversion strategies and activities designed to prevent, or minimize a participants unemployment.	0
E55	Candidate Pre-Screen (on behalf of the employer)	AJCC staff provided an employer association, or other such organization, customized screening and referral of qualified participants...	1
E65	Engaged in Strategic Planning/Economic Development	AJCC staff engaged in Workforce investment strategic planning.....	0
E66	Accessed Untapped Labor Pools	AJCC staff established pipeline activities in partnership with the public workforce system to access untapped labor pools. These activities include, but are not limited to, outreach to youth, veterans, individuals with disabilities, older workers, ex-offenders, and other targeted demographic.....	0

Business Interview Results: Eckerd staff was given a list of three (3) businesses the monitor was to interview. All there (3) businesses had an OJT participant placement. The results are:

Satisfaction Scale of 1- 10 with 1 being Very Dissatisfied and 10 being Very Satisfied:
The average participant response was 9.0.

- All three (3) businesses have experience using the local WIOA program for youth and/or adult placements over the last several years, having had multiple placements.
- All three (3) business have recommended the WIOA program to other business people.

- One (1) employer interviewed recommended the OJT paperwork be digitized to reduce the timecard packet errors.
- One employer recommended program improvements to include covering the cost of the business staff involved in the training of the OJT participant during the training period, citing the additional time/work in their workload.

Fiscal Sampling Review Results:

A fiscal sampling review was conducted by Edwin Ogu, HSD Accountant. He reviewed accounting records and systems; cash management and payroll systems; internal audit controls; cost classification and allocation systems. No issues were identified in this review.

Administrative Questionnaire: Based on the review, the areas of concern are so noted as recommendations and findings with requests for corrective action plans.

Contract Questionnaire: Based on the review, the areas of concern are so noted as recommendations and findings with requests for corrective action plans.

Financial Questionnaire: Based on the interview responses, there is continued compliance in all areas and there are no major concerns.

Andy Stone
Director, Workforce Development Board
Human Services Department

Date



☒ Action
 ☒ Consent
 ☐ Information
 ☐ Discussion

C.5 Affiliate AJCC Certification Process

COMMITTEE:	Executive Committee	MEETING DATE:	May 8, 2019
STAFF NAME: Andy Stone, WDB Director; Sara Paz-Nethercutt, Sr. Analyst			

SUMMARY:

As previously presented to the Workforce Development Board at its November 8, 2017 meeting, Workforce Innovation and Opportunity Act (WIOA) mandates America's Job Center of California (AJCC) sites must be objectively assessed for effectiveness, physical and programmatic accessibility at least once every three (3) years by the local Workforce Development Boards, in consultation with the state and chief elected officials. The certification process for the comprehensive AJCC located in Watsonville was completed by the state June 30, 2018 deadline. Beginning PY 2018-19, Local Boards are required to certify their affiliate (Capitola Career Center) and specialized (Suenos, WIOA youth site) AJCCs and guidance was provided in EDD Directive, WSD 19-11, dated March 14, 2019 with a May 1, 2019 deadline. There are five (5) components to the certification for each AJCC site:

1. Memorandum of Understanding (MOU) must be signed and implemented;
2. Equal Opportunity compliance;
3. Local Board Certification Process (timeline) outlined for state;
4. Hallmark of Excellence Assessment;
5. AJCC Certification form

The local timeline (process) attached includes a corrective action plan. WDB staff is currently still working with AJCC affiliate staff (Capitola Career Center) on the partner MOU to avoid the EDD stand-alone status prohibition under WIOA. Due to the tight turnaround time from directive issuance and changes to the partner configuration at the affiliate site with WIOA Title I staff co-located as of March 4, 2019, the May 1, 2019 deadline will not be met. WDB staff plans to have an affiliate AJCC MOU in place by September 30, 2019. The Suenos site is not required to have an MOU as they are the only partner at their site.

As a reminder the Hallmarks of Excellence is intended to encourage continuous improvement by identifying eight (8) areas where an AJCC may be exceeding quality expectations, as well as areas where improvement is needed. The eight areas include: physical location; universal access; partnerships; customer-centered services; targeted regional sectors and pathways; business services; cross-trained staff; and data driven continuous improvements. Each criteria is ranked on a scale of 1 to 5 and unlike the comprehensive AJCC certification, affiliate/specialized AJCCs are not required to meet a minimum score (ranking of at least 3) to receive certification. An action plan will be created from the Assessment and provided to this committee to show progress on all Hallmark rankings.

☒ Attachment(s)

SUGGESTED MOTION: (if applicable)

I move to approve the AJCC certification timeline (process) as outlined by WDB staff and to authorize the WDB chair to sign the MOU and AJCC Certification form on behalf of the board.

COMMITTEE DATE	04/24/19	COMMITTEE APPROVAL:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Other:
BOARD DATE		BOARD APPROVAL:	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Other:

Workforce Innovation and Opportunity Act (WIOA)
Santa Cruz County Workforce Development Board
Certification: Affiliate & Specialized AJCCs Timeline &
Corrective Action Plan

	Process	Date Of Activity
1.	Review Directive, WSD 18-11, March 14, 2019 Certification Process for Affiliate and Specialized AJCCs	March 2019
2.	Compile/Review list of five (5) Requirements for Certification Create Certification timeline	March 2019
3.	Capitola Career Center; Sueños conducts self-assessment: Hallmark of Excellence Certification: Affiliate & Specialized AJCCs	March 2019
4.	Requirement 1 Develop & Finalize Affiliate AJCC MOU Specialized AJCC (Sueños): N/A	ongoing – September 2019
5.	Requirement 2: Affiliate/Specialized AJCC meets Equal Opportunity requirements—self attestation	March 2019
6.	Requirement 3: Outline for Certification Process for Affiliate and Specialized AJCCs submitted to Regional Advisor (state)	March 2019
7.	Review Hallmark of Excellence Certification Process: Affiliate & Specialized AJCCs @ Career Center Operators Meeting	April 18, 2019
8.	Develop and submit to WDB Career Services Committee: (Board) Certification: Affiliate & Specialized AJCCs process (matrix) & timeline;	April 24, 2019
9.	<ul style="list-style-type: none"> - Requirement 4: Conduct the Hallmarks of Excellence Assessment using the required matrix and provide written evaluation - Conduct site visits: <ul style="list-style-type: none"> o SPECIALIZED site visit(s): <u>Date(s)</u> 4/22/2019 o AFFILIATE site visit(s): <u>Date(s)</u> 4/23/2019 - Determine final scores for Hallmark of Excellence Assessment: <ul style="list-style-type: none"> o Affiliate AJCC o Specialized AJCC 	<p>April 2019</p> <p>DUE: 4/2019</p>
10.	Create Corrective Action Plan (CAP) for Certification Process for Affiliate AJCC: deemed “not yet able to certify” for not having a signed MOU	May 1, 2019
11.	<ul style="list-style-type: none"> - Develop continuous improvement plans: <ul style="list-style-type: none"> o SPECIALIZED AJCC o AFFILIATE AJCC - Provide written action plan: <u>Date:</u> 5/30/2019 	<p>May 2019</p> <p>DUE: 5/2019</p>
12.	Requirement 5: Affiliate/Specialized AJCC Certification Form for each Review and submit to WDB Executive Committee: Obtain WDB Chair signature Hallmark of Excellence AJCC Certification matrix and recommendations	May 8, 2019
13.	Submit to Workforce Development Board: AJCC Certification matrix and recommendations Hallmark of Excellence Assessment for Affiliate and Specialized AJCC	May 30, 2018
14.	Submit Complete AJCC Certification for SPECIALIZED AJCC to State & Regional Adviser, State Hallmarks of Excellence Certification: Specialized AJCC and Continuous Improvement Plan	June 30, 2019
15.	CAP: ensure Affiliate AJCC (Capitola Career Center) is not a stand-alone center; added WIOA Title I presence on March 2019; develop MOU with co-located WIOA Title I partner	September 30, 2019
16.	Submit Complete AJCC Certification for AFFILIATE AJCC to State & Regional Adviser, State Hallmarks of Excellence Certification: Affiliate AJCC and Continuous Improvement Plan	September 30, 2019



☒ Action ☐ Consent ☐ Information ☒ Discussion

C.6 WDB and Committee Meeting Calendar



COMMITTEE:	Executive Committee	MEETING DATE:	May 8, 2019
STAFF NAME: Andy Stone, WDB Director; Laurel Gazza, WDB Administrative Aide			

SUMMARY:

Presenting the proposed 2019-20 Workforce Development Board and Committees Meeting Calendar, for approval.

☒ Attachment(s)

SUGGESTED MOTION: (if applicable)

Move to approve the 2019-20 Workforce Development Board and Committees meeting calendar, and submit to the full board for final approval.

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:

2019/2020 FY – WDB Meeting Dates (tentative)

July 24, 2019 – Career Services Committee
August 7, 2019 – Business Services/CEDS
August 28th, 2019 – Executive Committee
September 11, 2019 – Full WDB Board
September 25, 2019 – Career Services Committee
October 9, 2019 – Business Services/CEDS
November 13, 2019 – Executive Committee
December 11, 2019 – WDB Full Board
January 15, 2020 – Career Services Committee
February 12, 2020 – Business Services/CEDS
March 4, 2020 – Executive Committee
April 1, 2020 – Full WDB Board **see remarks in email**
April 8, 2020 – Business Services/CEDS
April 22, 2020 – Career Services Committee
May 6, 2020 – Executive Committee
May 27, 2020 – WDB Full Board

All dates are Wednesdays



☒Action ☐Consent ☐Information ☒Discussion

A.1 Committee Dashboard Metrics Review

COMMITTEE: Executive Committee	MEETING DATE: May 8, 2019
STAFF NAME: Andy Stone, WDB Director; Laurel Gazza, WDB Administrative Aide	

SUMMARY:

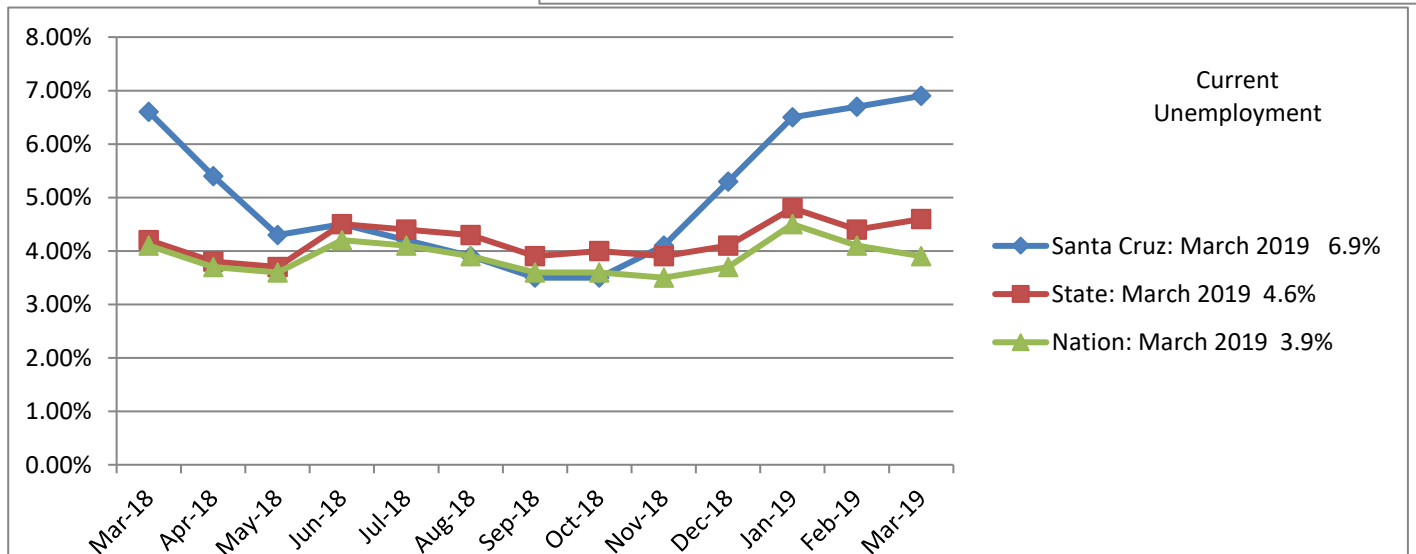
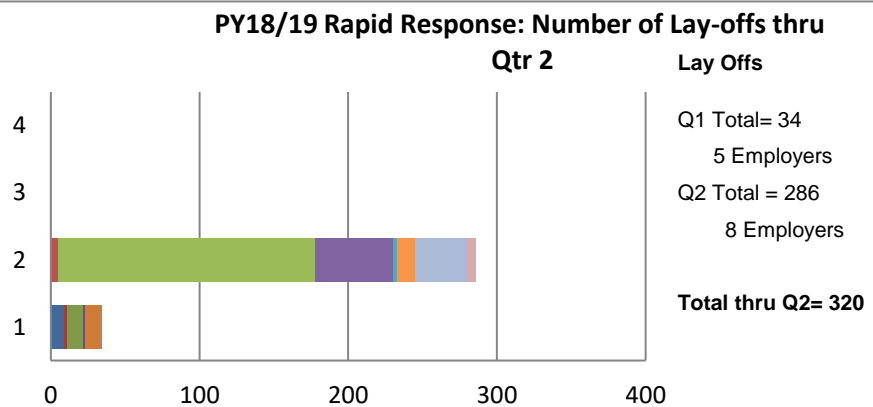
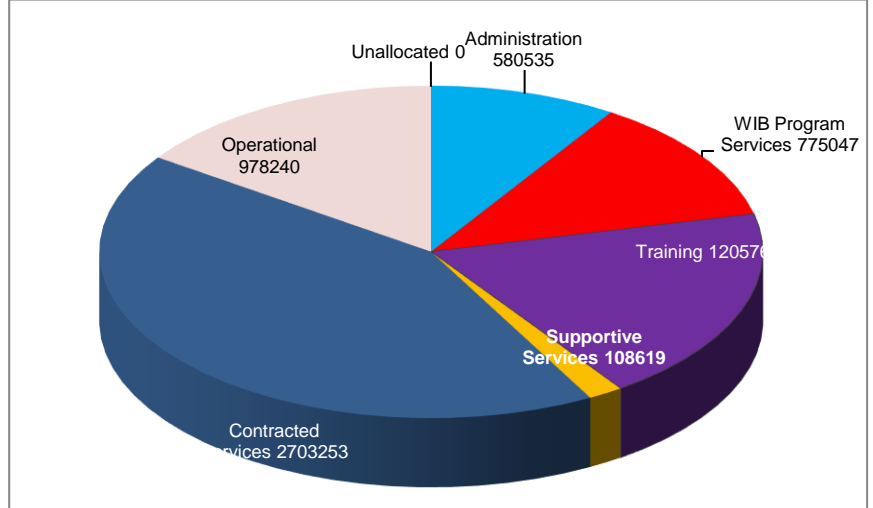
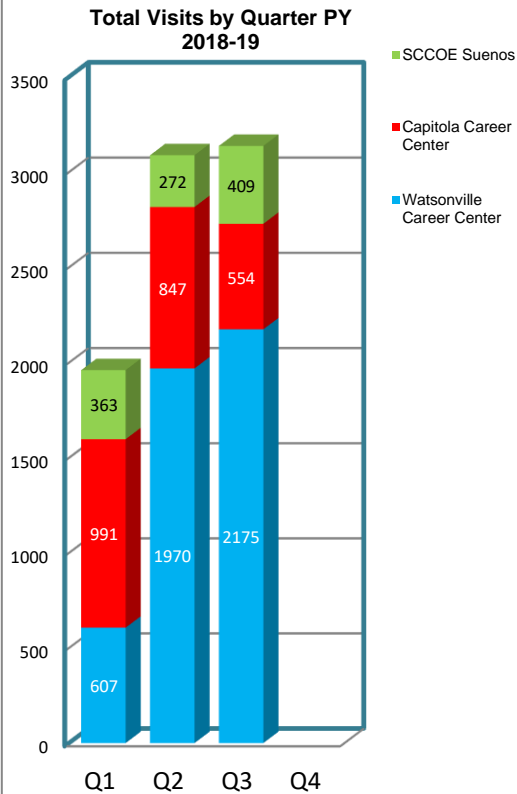
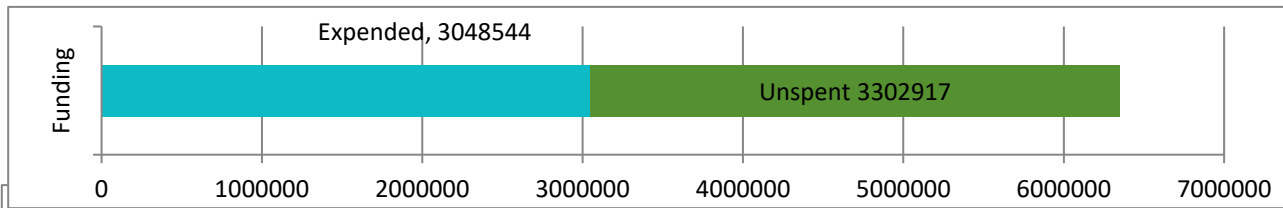
Attached, for review by the Committee, is the current Executive Committee dashboard, so that the Board members can discuss and decide what metrics and charts they wish to change or add.

☒Attachment(s)

SUGGESTED MOTION: (if applicable)

I move to accept the proposed changes to the Executive Committee dashboard, for future use.

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:





A.2 WDB WIOA Policies

COMMITTEE:	Executive Committee	MEETING DATE:	May 8, 2019
STAFF NAME: Andy Stone, WDB Director; Sara Paz-Nethercutt, Sr. Analyst; Belinda Barr, Business Services Manager			

SUMMARY:

From time to time, policy updates are necessary. With the implementation of the Workforce Innovation and Opportunity Act (WIOA), Employment Development Department Workforce Services has issued directives that local areas must apply.

Employment and Training Guidance Letter WIOA, No.21-16, entitled WIOA Title I Youth Formula Program Guidance, dated March 2, 2017; Employment Development Department (EDD) Workforce Services Directive WSD 16-18, entitled Selective Service dated April 10, 2017; EDD Workforce Services Directive WSD 17-01, entitled Nondiscrimination and Equal Opportunity Procedures, dated August 1, 2017; EDD Workforce Services Directive WSD 17-07, entitled WIOA Youth Program Requirements, January 16, 2018; EDD Workforce Services Directive WSD 18-03, entitled Pathway to Services, Referral, and Enrollment dated August 29, 2018; Code of Federal Regulation (CFR) 680.780-680.820, Incumbent Worker requirements.

The following policies are before this committee for review and approval:

1. WIOA Youth Eligibility Policy

This is a new policy which includes federal, state and local eligibility guidelines.

2. WIOA Youth Supportive Services Policy

This policy incorporates WIOA language into the previous approved WIA policy and uses the new WDB policy format.

3. WIOA Youth Incentive Policy

This policy incorporates WIOA language into the previous approved WIA policy and uses the new WDB policy format.

4. WIOA Youth program Work Experience (WEX) policy

This policy incorporates EDD Directives and uses the new WDB policy format.

5. Incumbent Worker Training policy

This policy incorporates the WIOA CFR requirement for the local area to establish a local policy.

☒Attachment(s)

SUGGESTED MOTION: (if applicable)

I move to approve the WIOA Operations Policies as drafted by WDB staff.

COMMITTEE DATE	COMMITTEE APPROVAL: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:

WIOA Youth Eligibility Policy

Policy Memorandum 19-01

Date: April 9, 2019

To: All WIOA Youth Service Providers

Purpose: To provide guidance to contractors (service providers) conducting eligibility for WIOA Youth participants.

Rescissions: WIA Eligibility Requirements and Barriers definitions, dated December 11, 2013, effective July 1, 2014

References: Youth as defined in WIOA Section 129 (a) (1); WIOA Section 188; Employment and Training Guidance Letter WIOA, No.21-16; 20CFR 681.210-320; Employment Development Department (EDD) Workforce Services Directive WSD 16-18, April 10, 2017; EDD Workforce Services Directive WSD 17-01, August 1, 2017; EDD Workforce Services Directive WSD 17-07, January 16, 2018; EDD Workforce Services Information Notice WSIN 17-31, April 13, 2018; EDD Workforce Services Directive WSD 18-03, August 29, 2018.

Background:

The Santa Cruz County Workforce Development Board (WBD) will make available the Workforce Innovation and Opportunity Act (WIOA) to local area Youth participants. The Workforce Development Board ensures that:

- WIOA Youth Contracted service providers must make each of the fourteen (14) service elements available to youth participants.
- Criteria provided under this policy are necessary to enable participants to participate in activities under Title I of WIOA.
- Provision of services under this policy is contingent upon the availability of WIOA funds.
- Additionally, at the discretion of the local Workforce Development Board this Policy is subject to change.

Policy:

A. General Provisions

Contracted service provider shall determine eligibility by applying the WIOA regulations, federal guidance, state Directives and local policy, when applicable.

B. Nondiscrimination and Equal Opportunity

Contractor shall discuss the rights and responsibilities the nondiscrimination and equal opportunity provisions of WIOA. This information must be communicated in appropriate languages and in formats accessible for individuals with disabilities. *Equal Opportunity Is the Law* and *Advisement of Participants rights* forms are both signed by contractor staff and the WIOA applicant acknowledging receipt of the information.

Contractor shall keep any and all medical or disability-related information obtained about an individual in a separate secured case file and treated as confidential. WIOA applications are accessible only via CalJOBS and not maintained in hard-copy format in the casefile.

C. Residency Requirement

Due to the limited In-School Youth (ISY) funding resources available, program participation for local area ISY shall be restricted to those between the ages of sixteen (16) through twenty-one (21)

residing in Santa Cruz County, zip codes: 95076, 95077 and 95019, except as provided in Section D, Exception to policy.

This residency requirement is not applied to the Out-of-School youth (OSY). OSY may reside anywhere in Santa Cruz County.

D. Eligibility

Different eligibility criteria apply to in-school youth (ISY) and out of school youth (OSY). School status is determined at the time of program eligibility determination/enrollment. School status remains the same through-out the youth's participation in the WIOA youth program, despite any changes in school attendance status during that time.

I. In-School Youth, defined

To be eligible to participate in the WIOA youth program, an In-School-Youth (ISY), is an individual who is:

- (a) Attending school (as defined by State law), including secondary and postsecondary school;
- (b) Not younger than 14 or (unless an individual with a disability who is attending school under State law) older than 21 at time of enrollment
- (c) a low-income individual; and
- (d) have one or more of the following:
 - 1. Basic skills deficient;
 - 2. An English language learner;
 - 3. An offender;
 - 4. A homeless individual aged 14 to 21 who meets the criteria defined in Sec. 41403(6) of the Violence Against Women Act of 1994 (U.S.C. 14043e-2(6), a homeless child or youth aged 14 to 21 who meets the criteria defined in Sec 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C 11434a(2) or a runaway;
 - 5. An individual in foster care or who has aged out of the foster care system or who attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under section 477 or the Social Security Act (42 U.S.C..677), or an individual who is in an out-of-home placement;
 - 6. An individual who is pregnant or parenting (custodial and non-custodial parent including non-custodial fathers);
 - 7. An individual with a disability—must be low-income, however is considered to be a family of one (10 for income purposes);
 - 8. An individual who requires additional assistance to complete an educational program or to secure or hold employment. (See Section D.III)

II. Out of School Youth, defined

To be eligible to participate in the WIOA youth program, an Out-of-School Youth (OSY) is an individual who is:

- (a) Not attending any school (as defined under state law);
- (b) Not younger than 16 or older than age 24 at time of enrollment. Because age at eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 24 once they are enrolled in the program; and
- (c) One or more of the following:
 - 1. A school dropout;
 - 2. A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school quarter. In cases where schools do not use quarters, local programs must use calendar quarters;
 - 3. A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner;
 - 4. An offender;

5. A homeless individual aged 16 to 24 who meets the criteria defined in Sec. 41403(6) of the Violence Against Women Act of 1994 (U.S.C. 14043e-2(6)), a homeless child or youth aged 16 to 24 who meets the criteria defined in Sec 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C 11434a(2) or a runaway;
6. An individual in foster care or who has aged out of the foster care system or who attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under section 477 or the Social Security Act (42 U.S.C.677), or an individual who is in an out-of-home placement;
7. An individual who is pregnant or parenting (custodial and non-custodial parent including non-custodial fathers);
8. An individual with a disability;
9. A low-income individual who requires additional assistance to complete an educational program or to secure or hold employment. (See Section D.III)

III. Youth requiring additional assistance

Youth who require additional assistance may include individuals who:

- Are underrepresented or vulnerable youth, e.g. immigrants with legal residency, including Deferred Action for Childhood Arrivals (DACA) recipients, LGBTQIA+;
- Have repeated at least one secondary grade level or are one year over age for grade;
- Have a core grade point average (GPA) of less than 1.5;
- For each year of secondary education, are at least two semester credits behind the rate required to graduate from high school;
- Are emancipated youth;
- Have aged out of foster care;
- Are previous dropouts or have been suspended five or more times or have been expelled;
- Are court/agency referrals mandating school attendance;
- Are deemed at risk of dropping out of school by a school official;
- Have been referred to or are being treated by an agency for a substance abuse related problem;
- Have experienced recent traumatic events, are victims of abuse, or reside in an abusive environment as documented by a school official or other qualified professional;
- Have serious emotional, medical or psychological problems as documented by a qualified professional;
- Have never held a job (applies to older youth);
- Have been fired from a job within the 12 months prior to application (applies to older youth); and
- Have never held a full-time job for more than 13 consecutive weeks (applies to older youth).

IV. Income guidelines for individuals with a disability

An ISY with a disability must be low-income. An OSY with a disability is not required to be low-income.

Income level for eligibility purposes is based on the individual's own income rather than their family's income.

V. Low-income

For OSY, only those youth who are the recipient of a secondary school diploma or recognized equivalent and are either basic skills deficient or an English language learner, and youth who require additional assistance to enter or complete an educational program or to secure or hold employment must be low-income.

All ISY must be low-income to meet the ISY eligibility criteria, except those that fall under the low-income exception.

Low-income status for a youth can be established in one of the following ways:

- Using the Lower Living Standard Income Level (LLSIL) and poverty guidelines (Attachment I);
- Receiving free or reduced price lunch under the Richard B Russell National School Lunch Act (42 U.S.C. 1751);
- Living in a high poverty area.

A youth who lives in a high poverty area is automatically considered to be a low-income individual. A high poverty area is a Census tract where there is a high concentration of residents with a poverty level income can be found. Instructions for determining whether a youth is living in a high poverty area can be found at <https://factfinder.census.gov>

VI. Low-income Exception~5% Dispensation

WIOA provides a dispensation that five percent (5%) of all youth (ISY and OSY) participants may qualify for services without meeting the income eligibility requirement as long as the participant is between the ages of sixteen (16) and twenty-four (24) **and** meets at least two (2) of the following eligibility criteria:

- Deficient in basic skills literacy;
- A school dropout, as verified at the time of WIOA enrollment;
- One or more grade level below the grade level appropriate to the individual's age;
- Homeless, runaway, or foster child;
- Pregnant or parenting;
- Possess one or more disabilities, including learning disabilities;
- Offender; or
- An individual who requires additional assistance to complete an educational program, or to secure and hold employment. Individuals who require additional assistance as defined by Section 6 of this WDB approved Youth policy.

VII. Selective Service Registration

Before being enrolled in WIOA-funded services/activities, all males, 18 and older, who are not registered with Selective Service and have not reached their 26th birthday must register through Selective Services website. If a male turns 18 while participating in WIOA-funded services, registration with Selective Service must be completed no later than 30 days after he becomes 18 in order to continue to receive WIOA-funded services. If a male under the age of 26 refuses to register with Selective Service WIOA funded services must be suspended until he registers.

Acceptable documentation to determine a person's eligibility for WIOA include the following, but is not limited to:

- Selective Service acknowledgement letter.
- Screen print out of the Selective Service Verification site.
<https://www.sss.gov/Home/Verification>
- Selective Service registration card.
- Stamped post office receipt of registration.

VIII. Authorization to Work

There is no work authorization verification requirement to be deemed eligible for WIOA program services. Program services cannot be denied if a youth is unwilling or unable to disclose a social security number (SSN). Staff must continue to establish a pseudo SSN for individuals who do not wish to provide or disclose a SSN. However, authorization to work must be verified prior to the service requiring coordination with employers and commencement of employment activities such as, the work experience placement.

An individual's authorization to work may be verified during the period of participation. Period of participation refers to the period beginning when the youth becomes a participant and ending on the participant's date of exit from the program.

Supportive services (e.g. linkages to community services, legal aid services) may be provided to help youth, such as homeless, ex-offenders, and transient youth, obtain authorization to work documents.

For a complete list of acceptable work authorization documents form I-9 can be found:

<https://www.uscis.gov/i-9>

E. Exception to policy

Staff assessing and documenting an exception to this policy shall complete the Policy Exception Memo to request an approval by the Workforce Development Board Director and/or designee.

F. WIOA Enrollment

To participate in youth programs, participants must be enrolled via the CalJOBS state case management tracking system. In order to be considered a participant in the WIOA Youth program all of the following must occur:

- (1) An eligibility determination;
- (2) Provision of an objective assessment;
- (3) Development of an individual service strategy; and
- (4) Participation in any of the 14 WIOA youth program elements.

G. Contracted Service Provider Responsibilities

Service Provider shall ensure that records and documentation of eligibility determination as required by WIOA regulation provided by the participant are kept in the case file and made available for review by local, state and federal monitors. Failure to comply with the requirements may result in the service provider being placed on a corrective action and/or incur disallowed costs.

The service provider is responsible for completing the eligibility data points in CalJOBS.

H. Availability of Funding

Service providers shall take necessary steps to enroll youth participants during the program year according to their contractual obligations. The WIOA Youth program services are ultimately contingent upon the availability of Federal funds and continued Federal authorization.

Action: All WIOA Youth Service Providers will comply with the WIOA Youth Eligibility policy. This policy memorandum is on-going and effective for WIOA participants enrolled after July 1, 2018.

Inquiries: Any questions regarding this policy memorandum may be directed to the WDB Director and/or designee.

Attachments:

- I. 70 Percent LLSIL and Poverty Guidelines
- II. Exception Memo

This Policy Revision: Executive Committee Approval: ;
Authorized by Workforce Development Board:

Attachment I

Priority of Service & Wait List Policy Priority of Service Income Guidelines

70 PERCENT LLSIL AND POVERTY GUIDELINES FOR 2018*

The Lower Living Standard Income Level (LLSIL) and poverty guidelines are used to establish low-income status for Workforce Innovation and Opportunity Act (WIOA) Title I programs.

Table 3 — San Francisco/Oakland/San Jose Metropolitan Statistical Area							
Local Areas	Alameda County		NOVA Consortium		San Jose/Silicon Valley		
	Contra Costa County		Oakland City		Santa Cruz County		
	Workforce Alliance of the		Richmond City		Solano County		
	North Bay		San Benito County		Sonoma County		
San Francisco City/County							
Family Size							
	1	2	3	4	5	6	Each Add'l add
70% LLSIL							
Annual	\$12,165	\$19,933	\$27,357	\$33,772	\$39,856	\$46,613	\$6,757
6 Months	\$6,083	\$9,967	\$13,679	\$16,886	\$19,928	\$23,307	\$3,379
100%	\$17,378	\$28,475	\$39,082	\$48,246	\$56,936	\$66,591	\$9,655
Poverty Guidelines							
Annual	\$12,140	\$16,460	\$20,780	\$25,100	\$29,420	\$33,740	\$4,320
6 Months	\$6,070	\$8,230	\$10,390	\$12,550	\$14,710	\$16,870	\$2,160
250%	\$30,350	\$41,150	\$51,950	\$62,750	\$73,550	\$84,350	\$10,800

Use the higher of either the LLSIL or the poverty guideline for the appropriate family size to determine low-income status. A comparison of the applicant's actual family income during the six-month income determination period with the six-month figures on the charts enables the reviewer to immediately determine income status.

Please note: The 100% row (in the 70% LLSIL table) is the criteria for determining whether employment leads to self-sufficiency.

***EDD Workforce Services Directive, WSD18-04; August 31, 2018**

Effective 2/26/2018, 250% of poverty guidelines used to determine underemployed adult applicant status per local priority of services policy exception.

Attachment II

POLICY EXCEPTION MEMO

DATE:

TO: Workforce Development Board Director:_____

FROM: WIOA Service Provider:_____

SUBJECT: ☐ Exception to ITA Limit Policy
☐ Exception to Supportive Service Limit
☐ Exception to WIOA Youth Policy:_____

Participant last name, first initial:_____ State ID#_____

Vocational Goal:_____

Explanation:

☐ Labor market demand ☐ Hardship of individual:_____

☐ Other: *Explain in comment section*

Comments:_____

WIOA service provider supervisor: _____
Authorized Signature

Workforce Development Board Staff Approval: ☐ Yes ☐ No: *Explain below.*

WDB Director and/or Designee Signature

Return original to sender for participant's case file.

WIOA Youth Supportive Services Policy

Policy Memorandum 19-02

Date: April 9, 2019

To: All WIOA Youth Service Providers

Purpose: To provide guidance to contractors (service providers) utilizing Supportive Services for eligible Youth participants.

Rescissions: WIA Supportive Services Policy, dated October 30, 2013

References: Youth as defined in WIOA sec. 3(59); Employment and Training Guidance Letter WIOA, No.21-16; WIOA Section 129; 20 CFR 680.930-970; 20 CFR 681.460; 20 CFR 681.570; Cost Principles 2 CFR part 200

Background:

The Santa Cruz County Workforce Development Board (WBD) will make available supportive services to appropriate Workforce Innovation and Opportunity Act (WIOA) Youth participants. The Workforce Development Board ensures that:

- WIOA Youth Contracted service providers must make each of the fourteen (14) service elements available to youth participants.
- Supportive Services under the WIOA is one of the fourteen (14) program elements.
- Services provided under this policy are necessary to enable participants to participate in activities under Title I of WIOA.
- Provision of supportive services under this policy is contingent upon the availability of WIOA funds.
- Additionally, at the discretion of the local Workforce Development Board this Supportive Service Policy is subject to change.

Policy:

A. General Provisions

Supportive services and needs-related payments for youth are available up to a maximum total of \$500 for the duration of WIOA enrollment, including follow up. Supportive services and needs-related payments will only be provided to an individual after they are enrolled into WIOA and during their WIOA participation. All requests for participant supportive services and all collaborating information detailing the need will be documented in CalJOBS as a case note entry. Services provided do not duplicate services available from other sources. To the extent possible, similarly situated participants receive similar services.

B. Procedure

1. Eligibility

Supportive Services may only be provided to individuals who are:

- Enrolled and participating in Youth programs with activities authorized under WIOA

2. Identifying & Assessing/Establishing Need

Service provider staff, within the scope of responsibility for case management, will identify the need for supportive services. Staff will assess the need by determining whether or not the customer needs the support to enable him/her to fully participate in WIOA Youth Services activities, leading to goal achievement(s). Staff will identify the need for supportive services

to enable the youth to participate in the activities that correspond to the support and attainment of their WIOA Individual Service Strategy (ISS) goals.

3. Justification for Need

Staff will create a CalJOBS case note entry for each WIOA Youth participant who has been approved for supportive services. Participation in the WIOA program does not entitle the participant to a supportive service but rather are provided as a service to enable an individual to participate in WIOA activities. While a participant may be eligible for supportive services, they do not have an unrestricted right to such supportive service.

C. Supportive Services Available

1. Linkages to community services
2. Transportation Assistance
Youth may be provided bus passes, to attend:
 - a. Work experience (WEX) placement site;
 - b. School; and/or
 - c. Sueños events or program sponsored activities.
3. Childcare Assistance
Youth participants using a qualifying childcare provider may be reimbursed up to \$500 for the duration of enrollment. This service requires the use of a licensed facility as contracted with Santa Cruz County Office of Education.
4. Assistance with housing
5. Assistance with educational testing, in the way of fees associated with obtaining a General Education Diploma (GED) or High School Equivalency Certificate (HiSET)
6. Reasonable accommodations for youth with disabilities
7. Legal aid services
8. Referrals to health care
Testing to detect tuberculosis bacteria in a TB skin test (TST) or TB blood test is available for youth participants. Occasionally, additional testing may be required for a positive TST and subsequent testing associated with obtaining a negative TST can be covered.
9. Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear
10. Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes
Youth participants must be enrolled in postsecondary education classes at a community college or university and have their Free Application for Federal Student Aid (FAFSA) award letter on file and aid coordinated in order to qualify.
11. Payments and fees for employment and training-related applications, tests, and certifications, such as fingerprinting

The sum of all Supportive Services (transportation, child care, other services) shall not exceed \$500, except as provided in Section E, Exception to policy.

D. Needs-Related Payments

Needs related payments provide financial assistance to youth participants for the purpose of enabling them to participate in training. Needs related payments can help individuals meet their non-training expenses and help them complete training successfully. However, the sum of all Supportive Services (including needs-related payments) shall not exceed \$500, except as provided in Section E, Exception to policy.

- A participant must be enrolled in a WIOA training program;
- May be provided if the participant has been accepted in a training program that will begin within thirty (30) calendar days.

Youth Eligibility Requirements:

To receive needs-related payments, a youth must:

- a) Be 18-24 years of age when receiving payments;
- b) Be unemployed;
- c) Not qualify for, or have ceased qualifying for unemployment compensation, and
- d) Be enrolled in a WIOA approved training program

E. Exception to policy

There may be emergency or extenuating circumstances which would warrant a higher expenditure in any of the supportive services categories. Staff assessing and documenting a need that exceeds the \$500 policy amount should complete the Policy Exception Memo to request a higher amount. Amounts exceeding \$500 must be reviewed by the WIOA service provider supervisor and submitted for approval by the WDB Director and/or designee. There will be a fiscal monitoring mechanism in place so as not to exceed the annual budgeted amount. Contractor shall create a CalJOBS case note entry to justify any authorizations exceeding the policy amount.

F. Availability of Funding

Service providers will take necessary steps to disburse the supportive services in a manner so as to provide services throughout the program year to youth. It is expected that the availability of funds will fluctuate during the program year as participant need varies. Supportive Services funds distribution is ultimately contingent upon the availability of funds.

G. Contracted Service Provider Responsibilities

Supportive Services will be tracked by the Contractor and all information and documentation will be kept in the case file. All supportive services payments and collection of back-up documentation (i.e. receipts, etc.) will be the sole responsibility of the service provider.

The service provider is responsible for creating the corresponding supportive services data entry activity code in CalJOBS. Supportive services data entry date (or date range) must match the back-up documentation (receipt) date for an appropriate supportive allowance.

In the event the service provider desires to create forms to enhance the flow of supportive service, WDB Director or designee must first approve the forms. Upon approval, the service provider shall train their staff on any new forms and/or procedures.

Service Provider shall ensure that appropriate records and documentation of supportive services provided pertaining to such payments are kept in the case file and made available for review by local, state and federal monitors. Failure to comply with the requirements may result in the service provider being placed on a corrective action and/or incur disallowed costs.

Action: All WIOA Youth Service Providers will comply with the attached Supportive Services policy. This policy memorandum is on-going and effective for WIOA participants enrolled after July 1, 2018.

Inquiries: Any questions regarding this policy memorandum may be directed to the WDB Director.

Attachments:

I. Exception Memo

This Policy Revision: Executive Committee Approval: ;
Authorized by Workforce Development Board:

Attachment I

POLICY EXCEPTION MEMO

DATE:

TO: Workforce Development Board Director: _____

FROM: WIOA Service Provider: _____

SUBJECT: ☐ Exception to ITA Limit Policy
☐ Exception to Supportive Service Limit
☐ Exception to WIOA Youth Policy: _____

Participant last name, first initial: _____ State ID# _____

Vocational Goal: _____

Explanation:

☐ Labor market demand ☐ Hardship of individual: _____

☐ Other: *Explain in comment section*

Comments: _____

WIOA service provider supervisor: _____
Authorized Signature

Workforce Development Board Staff Approval: ☐ Yes ☐ No: *Explain below.*

WDB Director and/or Designee Signature

Return original to sender for participant's case file.

DRAFT

WIOA Youth Incentive Policy

Policy Memorandum 19-03

Date: April 9, 2019

To: All WIOA Youth Service Providers

Purpose: To provide guidance to contractors (service providers) providing incentive payments for eligible youth.

Rescissions: WIA Incentive Policy, dated April 23, 2014

References: Youth as defined in WIOA sec. 3(59); 2 CFR Part 200; Employment and Training Guidance Letter WIOA, No.21-16; 20 CFR 681.640; Employment Development Department (EDD) Workforce Services Directive WSD 17-07, January 16, 2018;

Background:

The Santa Cruz County Workforce Development Board (WBD) will make available incentive payments to appropriate Workforce Innovation and Opportunity Act (WIOA) Youth participants. The Workforce Development Board ensures that:

- Criteria provided under this policy are necessary to encourage success and enable participants to be recognized for the completion and achievement of activities under Title I of WIOA.
- Provision of incentive payments under this policy is contingent upon the availability of WIOA funds.
- Additionally, at the discretion of the local Workforce Development Board this Policy is subject to change.

Policy:

A. General Provisions

Contracted service provider may grant incentive award payments to eligible youth enrolled in the WIOA youth program. Incentive payments are intended to be used to encourage and motivate WIOA youth to reach specific goals to obtain positive performance.

An incentive payment is a one-time or regular payment to a WIOA youth participant for the successful participation in and achievement of expected program and performance outcomes linked to training activities, education and work experiences (WEX).

B. Benchmarks

Contractor shall use the Incentive Claim form, a locally developed document to identify the activities and/or benchmarks tied to the specific payment/stipend amount. No more than \$600 may be allocated for any one participant, except as provided in Section C, Exception to policy.

C. Exception to policy

Staff assessing and documenting an exception to this policy must complete the Policy Exception Memo to request an approval by the Workforce Development Board Director and/or designee. There will be a fiscal monitoring mechanism in place so as not exceed the annual budgeted amount. Contractor shall create a CalJOBS case note entry to justify any authorizations exceeding the policy amount.

D. Contracted Service Provider Responsibilities

Contractor shall assess the need for incentive payments and make note of such need in the Individual Service Strategy (ISS). Incentive payments must be tracked by the Contractor and all information and documentation of incentive payment eligibility are kept in the case file and made

WIOA Youth Incentive Policy**Policy Memorandum 19-03**

available for review by local, state and federal monitors. A signature of receipt by the youth participant must be included in the participant case file.

The service provider is responsible for creating the corresponding incentive payment activity codes and corresponding beginning and ending dates in CalJOBS. Incentive payment data entry date (or date range) must match the backup documentation for the benchmark(s) used to earn the payment. Contractor shall create a CalJOBS case note entry to explain/document the incentive payments earned and justify any authorizations exceeding the policy amount.

Failure to comply with the requirements may result in the service provider being placed on a corrective action and/or incur disallowed costs.

Contractor may develop a revised payment plan and obtain WDB or its designee approval to changes in the specific youth accomplishments used as benchmarks for payment attainment.

Contractor shall have a budget line item as part of the annual program contract and incentive payments to youth for an achievement directly tied to the work experience is an allowable WEX expenditure.

E. Availability of Funding

Participation in the WIOA program does not automatically entitle the participant to the incentive award payment but rather should be an award for achievements of certain benchmarks outlined on the incentive claim form.

Service providers will take necessary steps to disperse the incentive payments in a manner so as to provide services throughout the program year to youth. It is expected that the availability of funds will fluctuate during the program year as participant benchmarks are attained. The WIOA Youth program services is ultimately contingent upon the availability of Federal funds and continued Federal authorization.

Action: All WIOA Youth Service Providers shall comply with the WIOA Incentive policy. This policy memorandum is on-going and effective for WIOA participants enrolled after July 1, 2018.

Inquiries: Any questions regarding this policy memorandum may be directed to the WDB Director.

Attachments:

- I. Exception Memo
- II. Incentive Claim form

This Policy Revision: Executive Committee Approval: ;
Authorized by Workforce Development Board:

Attachment I

POLICY EXCEPTION MEMO

DATE:

TO: Workforce Development Board Director: _____

FROM: WIOA Service Provider: _____

SUBJECT: ☐ Exception to ITA Limit Policy
☐ Exception to Supportive Service Limit
☐ Exception to WIOA Youth Policy: _____

Participant last name, first initial: _____ State ID# _____

Vocational Goal: _____

Explanation:

☐ Labor market demand ☐ Hardship of individual: _____☐ Other: *Explain in comment section*

Comments: _____

WIOA service provider supervisor: _____
 Authorized Signature

Workforce Development Board Staff Approval: ☐ Yes ☐ No: *Explain below.*

 WDB Director and/or Designee Signature

Return original to sender for participant's case file.

**WIOA Youth** A.2 Attachment 3
Sueños
Incentive Claim Form

Dr. Faris Sabbah, Superintendent · 400 Encinal Street, Santa Cruz, CA 95060 · Tel (831) 466-5600 · Fax (831) 466-5607 · www.santacruzcoe.org

Name: _____ Social Security #: _____ DOB: _____

Address: _____ City: _____ CA ZIP: _____

WIOA Enrollment Date: _____

WIOA Closure Date (if in Follow-up): _____

Youth is enrolled as: ☐ In school ☐ Out of School

Submitted by (staff name): _____

Incentive Claim Information:**JOB TRAINING PROGRAM:** ☐ HTCS ☐ Other Program: _____☐ \$150 At end of program or activities ☐ WEX related

In order to receive the above award youth must have completed the following:

☐ Attend Goal Setting Meeting and complete any assessments AND☐ Completed all work readiness pre and post assessments AND☐ Achieve at least 90% attendance in all academy activities**CAREER DEVELOPMENT:**☐ \$25 per 3 hour Job Shadow Activity – up to four – attach backup: _____ ☐ WEX related☐ \$50 Job Preparation Workshops – Series of Three - Attach attendance sign-in sheets. ☐ WEX related☐ \$50 Set of 3 Career Exploration/mentoring activities - Attach sign-in sheets.☐ \$25 per 3 Youth Leadership Activities. Attach sign-in sheets☐ \$ _____ Bonus for Community Project: ½ day event= \$25; full day event= \$50.00; 2-day event= \$75.00
List Project and Dates: _____☐ \$75 Bonus for each 30 hours of job preparation activities - limited to 60 hours total. ☐ WEX related☐ \$ _____ Special Project or other activity – Must have prior administrative approval – attach backup.***Incentive Authorization Information:****My signature verifies that the youth participants file contains identification of the incentive plan in the ISS and eligibility for the incentive payment through documentation as indicated in the above check boxes:*_____
Signature of Authorized Agency_____
Representative's Phone Number_____
Date_____
Printed Name of Representative_____
Title and Agency***Participant Acknowledgment of payment:***_____
Youth signature acknowledges receipt of check_____
Date

WIOA Youth Work Experience Policy

Policy Memorandum 19-04

Date: April 9, 2019

To: All WIOA Youth Service Providers

Purpose: To provide guidance to contractors (service providers) providing work experience opportunities as one of the fourteen program elements for youth enrolled into the WIOA Title I youth program.

Rescissions: WIOA Work Experience Policy, dated April 6, 2016

References: Youth as defined in WIOA Section 3(59); WIOA Section 129(c)(2); WIOA Section 188; 20 CFR 681.460; 20 CFR 681.590-630; Employment and Training Guidance Letter WIOA, No.21-16; Employment Development Department (EDD) Workforce Services Directive WSD 17-01, August 1, 2017; EDD Workforce Services Directive WSD 17-07, January 16, 2018; EDD Workforce Services Directive WSD 18-03, August 29, 2018.

Background:

The Santa Cruz County Workforce Development Board (WDB) will make available paid and unpaid work experience opportunities to appropriate Workforce Innovation and Opportunity Act (WIOA) Youth participants. The Workforce Development Board ensures that:

- Criteria provided under this policy are necessary to enable participants to participate in paid and unpaid work experience activities under Title I of WIOA.
- Provision of paid work experience under this policy is contingent upon the availability of WIOA funds.

Policy:

A. General Provisions

Paid and unpaid work experiences that have academic and occupational education components shall be made available to local youth enrolled in the WIOA Title I youth program.

B. Program Element

Work experiences (WEX) are a planned, structured learning experience and provide youth opportunities for career exploration and skill development. WEX opportunities must meet the following criteria:

- takes place in a workplace for a limited period of time;
- paid or unpaid;
- takes place in private for-profit sector, the non-profit sector, or the public sector;
- applicable labor standards as defined by the Fair Labor Standards Act;
- may not be used to directly or indirectly aid in filling a job opening that is vacant because the former occupant is on strike, or is in the course of a labor dispute.
- must include academic and occupational education concurrently or sequentially with the WEX, and inside or outside the worksite;

WEX opportunities include the following categories:

- 1) Summer employment opportunities and other employment opportunities available throughout the school year;
- 2) Pre-apprenticeship programs designed to prepare an individual to enter and succeed in an apprenticeship program;

WIOA Youth Work Experience Policy**Policy Memorandum 19-04**

- 3) Internships and job shadowing (temporary, unpaid exposure to the workplace in an occupational area of interest and may last anywhere from a few hours to a week or more);
- 4) On-the-job (OJT) opportunities as defined in the local WDB approved OJT policy
- 5) Classroom training or the required academic education component directly related to the work experience.

1. Eligibility

Work experiences shall be available to In-school (ISY) and Out-of school youth (OSY). The WEX will be based on the youths' Individual Service Strategy (ISS) which outlines the program service objectives/goals for the youth.

Work placement related expenses such as TB testing and fingerprinting costs are included in the contractor budget and are deemed a supportive service as per local policy. Incentive payments and other supportive services associated with a WEX must be paid in accordance with the respective approved WDB policy.

2. Paid WEX Duration

Youth activity may last up to 250 hours, based on worksite training plan and availability of funding, except as provided in Section C, Exception to policy.

3. Hourly wage

Wages paid must adhere to state minimum wage requirements.

Wages are paid as follows:

- Youth between the ages of 16-17 or 18 years old without a diploma or GED: minimum wage, which is currently \$12.00/hour effective 1/1/2019;
- Youth who are 18 years of age and have completed their high school diploma or GED: paid consistent with the contracted service provider *Student Worker* job classification, which is currently \$13.07/hour;
- Youth between the ages of 19-24 with or without a high school diploma or GED: paid consistent with the contracted service provider *Student Worker* job classification, which is currently \$13.07/hour.

With an exception approved as per Section C, Exception to policy, OSY may receive a higher wage based on the industry standard of their worksite of interest.

4. Worksite development

Contractor is the designated *Employer of Record* and must adhere to all child labor laws regarding work permits, hours of employment, time cards and working conditions.

Worksites shall be developed or secured based on youth interests and their respective ISS goals.

The worksite is closely matched to the participants' occupational and academic interest as identified in the ISS. Additionally, contractor shall match employers who provide training in identified skills and meaningful employment in fields that appear on the WDB-approved Demand Occupation List. Lastly, worksites identified must be able to successfully mentor youth and help them learn transferrable job skills.

5. Authorization to Work

Although there is no work authorization verification requirement to be deemed eligible for WIOA program services, youth work status must be verified for employment activities such as paid work experiences.

WIOA Youth Work Experience Policy**Policy Memorandum 19-04****C. Exception to policy**

Staff assessing and documenting an exception to this policy must complete the Policy Exception Memo to request an approval by the Workforce Development Board Director and/or designee. There must be a fiscal monitoring mechanism in place so as not to exceed the annual budgeted amount. Contractor shall create a CalJOBS case note entry to justify any authorizations exceeding the policy amount.

D. Contracted Service Provider Responsibilities

Work experience wages must be tracked by the Contractor and all information and documentation kept in the case file and made available for review by local, state and federal monitors.

The service provider is responsible for creating the corresponding WEX activity codes and corresponding beginning and ending dates in CalJOBS. WEX data entry date (or date range) must match the backup documentation. Contractor shall create a CalJOBS case note entry to explain/document and justify any authorizations exceeding the policy amount.

Failure to comply with the requirements may result in the service provider being placed on a corrective action and/or incur disallowed costs.

E. Availability of Funding

A minimum of 20% of the WIOA youth formula allocation must be spent on paid and unpaid work experiences. Funds spent on youth participant wages and staff costs for the development and management of WEX must be tracked and noted on the monthly budget claim.

Contractor providing the youth participant wages shall be responsible for assuring their contract budget line item is not exceeded during the program year. Service providers shall take necessary steps to disperse the work experience payments in a manner so as to provide services throughout the program year to youth. It is expected that the availability of funds will fluctuate during the program year as participants are attained. The WIOA Youth program services, including WEX is ultimately contingent upon the availability of Federal funds and continued Federal authorization.

Action: All WIOA Youth Service Providers shall comply with the WIOA work experience policy. This policy memorandum is on-going and effective for WIOA participants enrolled after July 1, 2018.

Inquiries: Any questions regarding this policy memorandum may be directed to the WDB Director.

Attachments:

- I. Exception Memo
- II. Demand Occupation List
- III. Work Experience Agreement

This Policy Revision: Executive Committee Approval: ;
 Authorized by Workforce Development Board:

Attachment I

POLICY EXCEPTION MEMO

DATE:

TO: Workforce Development Board Director: _____

FROM: WIOA Service Provider: _____

SUBJECT: ☐ Exception to ITA Limit Policy
☐ Exception to Supportive Service Limit
☐ Exception to WIOA Youth Policy: _____

Participant last name, first initial: _____ State ID# _____

Vocational Goal: _____

Explanation:

☐ Labor market demand ☐ Hardship of individual: _____
☐ Other: *Explain in comment section*

Comments: _____

WIOA service provider supervisor: _____
 Authorized Signature

Workforce Development Board Staff Approval: ☐ Yes ☐ No: *Explain below.*

 WDB Director and/or Designee Signature

Return original to sender for participant's case file.

Santa Cruz County High Demand Job Opportunities

Santa Cruz County continues to see jobs returning to the local economy and prospects for lower unemployment are improving. Over the next five years, Santa Cruz County is projected to add more than 3,500 jobs. The occupations within the industry sectors identified by the Workforce Development Board of Santa Cruz County that have the best job prospects are shown below.

SOC	Agriculture	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
11-9013	Farmers, Ranchers, and Other Agricultural Managers	1,680	131	31	2.0%	\$40.77
45-2091	Agricultural Equipment Operators	412	66	10	2.5%	\$15.34
45-1011	First-Line Supervisors of Farming, Fishing, and Forestry Workers	206	28	5	2.0%	\$23.46
SOC	Business & Financial Operations	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
11-1021	General and Operations Managers	1,633	150	67	4.0%	\$58.17
43-1011	First-Line Supervisors of Office and Administrative Support Workers	960	98	18	2.0%	\$28.89
13-2011	Accountants and Auditors	816	81	33	4.0%	\$35.48
13-1199	Business Operations Specialists, All Other	581	59	27	4.5%	\$33.32
13-1111	Management Analysts	601	59	30	5.0%	\$47.88
13-1161	Market Research Analysts and Marketing Specialists	349	43	33	9.0%	\$31.15
43-3021	Billing and Posting Clerks	322	39	25	7.5%	\$21.49
13-1071	Human Resources Specialists	304	33	13	4.5%	\$36.30
11-3031	Financial Managers	352	33	30	8.5%	\$65.43
11-3011	Administrative Services Managers	235	22	11	5.0%	\$48.13
43-9199	Office and Administrative Support Workers, All Other	162	19	7	4.0%	\$17.84
13-1151	Training and Development Specialists	171	18	8	4.5%	\$36.54
13-1051	Cost Estimators	128	14	5	4.0%	\$38.85
43-9041	Insurance Claims and Policy Processing Clerks	107	13	7	6.5%	\$20.19
13-2051	Financial Analysts	126	12	5	4.0%	\$44.52
SOC	Education & Public Administration	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
25-3098	Substitute Teachers	935	113	42	4.5%	\$18.61
25-9041	Teacher Assistants	959	112	51	5.0%	\$16.49
25-2031	Secondary School Teachers	917	74	45	5.0%	\$33.56
25-2021	Elementary School Teachers	881	73	43	4.5%	\$33.46
25-3099	Teachers and Instructors, All Other	428	54	26	6.0%	\$22.60
25-3021	Self-Enrichment Education Teachers	400	52	29	7.0%	\$30.19
33-9092	Lifeguards, Ski Patrol, and Other Recreational Protective Service	192	49	5	2.5%	\$15.91
25-2011	Preschool Teachers	384	42	19	5.0%	\$18.89
25-2022	Middle School Teachers	508	42	25	5.0%	\$29.76
33-3051	Police and Sheriff's Patrol Officers	442	30	9	2.0%	\$51.63
33-2011	Firefighters	373	26	8	2.0%	\$30.29
SOC	Engineering & Environmental Science	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
19-2099	Physical Scientists, All Other	204	17	5	2.5%	\$54.13
17-2051	Civil Engineers	161	13	7	4.0%	\$49.71
SOC	Healthcare	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
29-1141	Registered Nurses	1,612	115	135	8.0%	\$59.86
31-1014	Nursing Assistants	841	112	59	7.0%	\$16.35
31-9092	Medical Assistants	577	84	79	13.0%	\$20.48
21-1093	Social and Human Service Assistants	455	69	52	11.0%	\$19.71
43-6013	Medical Secretaries	457	63	49	10.5%	\$20.53
31-9091	Dental Assistants	360	48	30	8.0%	\$20.67
29-2061	Licensed Practical and Licensed Vocational Nurses	447	41	37	8.0%	\$25.67
21-1021	Child, Family, and School Social Workers	277	35	26	9.0%	\$22.93
29-2052	Pharmacy Technicians	325	29	14	4.5%	\$20.96
11-9111	Medical and Health Services Managers	240	26	28	11.5%	\$66.44
21-1023	Mental Health and Substance Abuse Social Workers	180	24	20	10.5%	\$27.55
31-9011	Massage Therapists	197	23	12	5.5%	\$20.77
31-9096	Veterinary Assistants and Laboratory Animal Caretakers	115	21	10	8.5%	\$18.13
29-2021	Dental Hygienists	269	21	22	8.0%	\$49.90
11-9151	Social and Community Service Managers	171	20	18	10.0%	\$43.13
21-1011	Substance Abuse and Behavioral Disorder Counselors	135	18	15	10.5%	\$19.90
29-2056	Veterinary Technologists and Technicians	159	16	14	8.5%	\$22.45
21-1029	Social Workers, All Other	125	15	9	7.5%	\$29.04
SOC	Retail & Hospitality	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
43-4051	Customer Service Representatives	1,121	148	22	2.0%	\$21.92
41-1011	First-Line Supervisors of Retail Sales Workers	1,315	139	10	0.5%	\$20.77
43-4171	Receptionists and Information Clerks	953	136	45	4.5%	\$16.30
35-1012	First-Line Supervisors of Food Preparation and Serving Workers	757	113	22	3.0%	\$17.60
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific	873	91	13	1.5%	\$34.47
41-3099	Sales Representatives, Services, All Other	449	59	21	4.5%	\$30.00
35-2012	Cooks, Institution and Cafeteria	239	37	12	5.0%	\$17.74
11-9051	Food Service Managers	308	35	9	3.0%	\$26.20

41-3021	Insurance Sales Agents	287	31	13	4.5%	\$33.85
41-9022	Real Estate Sales Agents	307	29	5	1.5%	\$33.13
11-2022	Sales Managers	308	28	7	2.0%	\$45.34
41-1012	First-Line Supervisors of Non-Retail Sales Workers	252	24	6	2.0%	\$34.23
soc	Information/Technology and Science	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
15-1132	Software Developers, Applications	305	29	38	11.5%	\$56.83
15-1151	Computer User Support Specialists	344	28	15	4.5%	\$25.10
15-1121	Computer Systems Analysts	270	19	9	3.5%	\$45.24
11-3021	Computer and Information Systems Managers	225	19	11	4.5%	\$63.70
15-1133	Software Developers, Systems Software	265	18	5	2.0%	\$50.82
15-1142	Network and Computer Systems Administrators	223	15	5	2.0%	\$40.43
15-1152	Computer Network Support Specialists	120	10	4	3.5%	\$39.47
15-1134	Web Developers	123	10	6	5.0%	\$27.07
soc	Manufacturing, Construction & Transportation	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	1,058	152	27	2.5%	\$16.73
47-2031	Carpenters	1,188	116	33	2.5%	\$28.17
49-9071	Maintenance and Repair Workers, General	1,018	108	34	3.5%	\$21.39
47-2061	Construction Laborers	932	106	43	4.5%	\$23.13
53-3033	Light Truck or Delivery Services Drivers	746	84	21	2.5%	\$18.99
53-3032	Heavy and Tractor-Trailer Truck Drivers	551	62	13	2.5%	\$21.78
47-2152	Plumbers, Pipefitters, and Steamfitters	394	48	26	6.5%	\$26.63
49-3023	Automotive Service Technicians and Mechanics	451	44	8	2.0%	\$23.65
47-1011	Supervisors of Construction and Extraction Workers	381	41	17	4.5%	\$36.68
47-2111	Electricians	312	37	10	3.5%	\$32.88
53-3021	Bus Drivers, Transit and Intercity	278	36	10	3.5%	\$22.79
53-7051	Industrial Truck and Tractor Operators	269	31	5	1.5%	\$18.37
47-2141	Painters, Construction and Maintenance	341	30	6	2.0%	\$21.92
11-9021	Construction Managers	364	28	14	3.5%	\$51.01
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	245	27	15	6.0%	\$28.46
53-3022	Bus Drivers, School or Special Client	203	26	7	3.0%	\$17.40
47-2073	Operating Engineers and Other Construction Equipment Operators	189	23	9	4.5%	\$31.11
soc	Services	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
39-9032	Recreation Workers	329	61	20	6.0%	\$14.57
39-9031	Fitness Trainers and Aerobics Instructors	170	30	7	4.0%	\$20.38
39-1021	First-Line Supervisors of Personal Service Workers	243	28	20	8.0%	\$20.63
39-9041	Residential Advisors	118	23	11	9.0%	\$15.29
27-1024	Graphic Designers	218	21	4	2.0%	\$31.35
soc	Other	2018 Jobs	Annual Openings	5-Year Projected Job Growth	5-Year Projected Growth %	Avg. Hourly Earnings
11-9199	Managers, All Other	961	73	26	2.5%	\$54.18
27-2022	Coaches and Scouts	232	35	14	6.0%	\$18.51

These occupations are in industries with projected growth from 2018-2023, that pay a wage of at least \$14.50/hour, or \$30,150 annually (current 250% poverty guideline for Santa Cruz County), and have an education/experience level at or below the Bachelor's Degree level.

Source: JobsEQ®

Data as of 2017Q3 unless noted otherwise

Note: Figures may not sum due to rounding.

1. Occupation wages are as of 2016 and should be taken as the average for all Covered Employment

2. Data represent found online ads active within the last thirty days in any zip code intersecting or within the selected region; data represents a sampling rather than the complete universe of postings.

Exported on: Friday, August 10, 2018 9:31 AM

8/15/2018



SantaCruzCountyOfficeofEducation:

WorkSiteAgreement

400 Encinal Street
Santa Cruz, CA 95060
831/466-5600 Fax: 831/466-5719

D Job Shadow
D Mentoring
D Subsidized Work

Worksite Name: _____ Worksite Address: _____
Worksite City: _____ Worksite Zip: _____ Phone: _____
Fax: _____ Email: _____
Mentor: _____ Alternative Mentor: _____
Worksite Type: ☐ Private Sector ☐ Public Sector ☐ Non-Profit
Job Title: _____ Number of Positions Available: _____

Anticipated work
schedule:

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
_____	_____	_____	_____	_____	_____	_____

Any requirements for worksite (Minimum age, clothing, TB test, fingerprints, etc)? _____

Can you accommodate youth at your worksite who:

☐ Available mornings only? ☐ Available afternoons only? ☐ Available evenings only? ☐ Limited English Speaking? List language you can accommodate: _____

☐ Are physically limited? (Please describe accommodations): _____

Are hazardous duties or equipment usage associated with this position? ☐ Yes ☐ No

If so please list: _____

Is worksite available by public transportation? ☐ Yes ☐ No

Additional comments: _____

Skill an proficiency levels to be attained: (5 minimum/Please attached additional pages if needed)

1. _____
2. _____
3. _____
4. _____
5. _____

Measurements of Success: (Please check all that apply)

☐ Review ☐ Employee Feedback ☐ Daily Log
☐ Observation ☐ Customer Feedback ☐ Job Specific Results
☐ Other: _____

Please Read Carefully and Report any Changes to this Agreement to the Santa Cruz County Office of Education (SCCOE)/Sueños Partnership
Upon assignment of Sueños WIOA Youth Services participants, all worksites shall be required to adhere to and comply with the following Federal, State and County rules and regulations.

General Compliance

1. Santa Cruz County Office of Education/Sueños (hereafter SCCOE) and inclusive without limitation, its officers, agents, employees, sub-contractors and volunteers shall not be liable and is released by the participating worksite for any and all liability, for any personal injury to or property damage sustained by the worksite, its officers, agents, employees, sub-contractors or volunteers in any way connected with the SCCOE activities on the worksite's property, except to the extent such damage was caused solely by the willful misconduct of SCCOE or its officers agents, employees, sub-contractors or volunteers. The participating worksite shall indemnify, defend and hold SCCOE harmless from and against all claims, losses, liabilities, penalties, costs and expenses or legal actions filed or threatened against SCCOE due to the violation of any law, death, bodily injury, or property damage incurred by the worksite or its officers, agents employees, sub-contractors, volunteers, or any other third party in any way connected with SCCOE activities on the worksite's property, except to the extent the same claims, losses, liabilities, penalties or costs and expenses are caused solely by the willful misconduct of Sueños or its officers, agents, employees, sub-contractors or volunteers.
2. Private Sector worksites shall maintain comprehensive or Commercial General Liability Insurance coverage in the minimum amount of \$1,000,000 combined single limit, including coverage for: (a) bodily injury, (b) personal injury, (c) broad form personal damage, (d) contractual liability, and (e) cross liability.
3. No currently employed worker shall be displaced or have work hours reduced as a result of Sueños participant. Participants shall not be placed into a regularly budgeted position classification in which current vacancies exist.
4. Participants shall not be allowed to work prior to proper enrollment by SCCOE/Sueños Partnership. Participants shall meet the WIOA eligibility requirements. If subsequent to enrollment, a participant is determined ineligible, SCCOE/Sueños Partnership shall terminate such participant from the program.
5. Worksite shall comply with all Equal Employment Opportunity laws, SCCOE nondiscrimination policies, SCCOE Grievance Procedures and program accident/injury reporting procedures.
6. Access to the worksite shall be allowed to, State and Department of Labor monitors and to members of the Santa Cruz Workforce Development Board.
7. The WIOA Grievance Process is defined by law and described in the Workforce Innovation and Opportunity Act. The process shall be used to resolve the complaints of participants and other interested parties affected by the workforce Investment System. Copies of the grievance provisions are available upon request from the SCCOE, Student Support Services Department.
8. Participants shall not engage in any religious, political or fundraising activities during work hours.
9. Participants shall not be employed in jobs, which are not age appropriate and considered hazardous according to the Federal and State Child Labor Laws
10. Participants shall not be employed in the construction, operation, or maintenance of any portion of a facility used or to be used for religious instruction or worship, not in any assignment, which involves religious duties.
11. In the event of non-compliance with the provisions of the Worksite Agreement, the SCCOE may remove any or all of the assigned Sueños participants from the worksite.

Worksite Responsibilities

1. Worksite shall provide participants and program counselor with performance evaluations in the manner prescribed by the SCCOE/Sueños Partnership.
2. Worksite mentor shall contact the assigned SCCOE caseworker in the event the participant's performance is unsatisfactory, prior to terminating the participant's employment.
3. Worksite shall provide all participants with an orientation that includes, but is not limited to: (a) Job description, duties, and responsibilities, (b) Hours or work, time and attendance procedures, (c) Emergency and accident procedures.
4. Worksite shall provide meaningful, sufficient, well-supervised work experience and adequate materials and equipment for all participants,
5. Worksite shall maintain an accurate record of hours worked by each participant and shall complete time records in accordance with the procedures and schedules established by the Santa Cruz County Office of Education.
6. Worksite shall maintain a safe and sanitary work environment.
7. Worksite shall allow participant to attend Sueños workshops and basic skills classes.
8. Worksite shall assure the youth will not operate a vehicle owned/leased by business or personal vehicle in performance of the agreement.
9. Worksite shall maintain confidentiality of any information regarding the youth of his/her immediate family and comply with all applicable WIOA regulations regarding confidentiality in the operation of the program. A participant's status as a WIOA recipient is to be safeguarded and not disclosed without written authorization.
10. When an Occupational Skill goal, has been set, the worksite shall allow the youth to participate in a minimum of 90 hours of work experience. The worksite shall use the Workforce Development Board approved Occupational Skills curriculum provided by Sueños WIOA for measuring and evaluating the job specific skills competencies.

SCCOE/Sueños Partnership Responsibilities

1. To monitor the training site to assure appropriate health and safety conditions exist, compliance of child labor laws and adherence to applicable Workforce Innovation and Opportunity Act Regulations.
2. To provide time sheets and evaluations for Mentor to complete.
3. To pay the wages of each youth during the work experience period.
4. To provide the worker's compensation insurance coverage for each youth during the term of work experience.
5. To provide supportive services such as safety tools, clothing, and equipment if they are required by the Worksite for all similarly situated employees.
6. To assist in the resolution of disputes between the youth and mentor.

Worksite Mentor

Santa Cruz County Office of Education

By: _____
Signature, Agency Authorized Representative

By: _____
Signature, Coordinator WIOA Youth Services

Name: _____
Printed Name of Signatory

Date

WIOA Incumbent Worker Training (IWT) Policy

Policy Memorandum 18-05

Date: May 29, 2019

To: All WIOA Staff and Service Providers

Purpose: To provide guidance to staff and contractors (service providers) utilizing incumbent worker training services for eligible clients.

Rescissions: None

References: Workforce Innovation and Opportunity Act (WIOA) (Public Law 113-128) Sections; 122(h)&(i), 134(d)(4), 134(G)(ii), 134(c)(3)(H), and 194(4); Title 20 Code of Federal Regulations Sections 680.780 – 680.820; Training and Employment Guidance Letter (TEGL) 10-16, Change 1, Subject: Performance Accountability Guidance for WIOA Title I, Title II, Title III and Title IV Core Programs (August 23, 2017); California Unemployment Insurance Code Sections 14000-14530; California's Unified Strategic Workforce Development Plan (State Plan) 2016-2020; Workforce Services Directive WSD16-15, Subject: Dislocated Worker Additional Assistance Projects (December 28, 2016); WSD16-13, Subject: Monthly and Quarterly Financial Reporting Requirements (November 28, 2016); WSD16-04, Subject: Rapid Response and Layoff Aversion Activities (July 22, 2016); WSD14-01, Subject: Workforce Investment Act Training Expenditure Requirements (July 8, 2014); EDD Draft Directive WSDD-187; and Training and Employment Guidance Letter WIOA No. 19-16, Subject: Guidance on Services provided through the Adult and Dislocated Worker Programs (March 1, 2017).

Background:

Incumbent worker training (IWT) provides both employers and workers with the opportunity to build and maintain a quality workforce. The program is designed to meet the needs of an employer or group of employers to retain a skilled workforce or avert layoffs. WIOA sets criteria to determine which workers, or groups of workers, are eligible for IWT services and the cost sharing required for IWT projects and employers.

Policy:

A. Incumbent Worker Eligibility

An incumbent worker must be:

1. Employed
2. Meet the Fair Labor Standards Act requirements for an employer-employee relationship
3. Employment history requirement - have an established employment history with the employer for 6 months or more (which may include time spent as a temporary or contract worker performing work for the employer receiving IWT funds)

There is one exception to the six-month requirement, which is that when the incumbent worker training is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six months or more as long as a majority of those employees being trained meet the employment history requirement.

An incumbent worker does not have to meet the eligibility requirements for career and training services for adults and dislocated workers under WIOA Title I, unless they are co-enrolled as a participant in the WIOA adult or dislocated worker program. IWT can also be used for underemployed workers, e.g. workers who would prefer full-time work but are working part-time for economic reasons.

B. Employer Eligibility

The Santa Cruz County Workforce Development Board (SCC WDB) staff or designated review panel will determine whether an employer is eligible for IWT based on, at a minimum:

1. The characteristics of the individuals in the program (e.g. individuals with barriers to employment).
2. Whether the training improves the labor market competitiveness of the employees or both the employees and the employer.
3. The employer has a valid California Employer Account Number.
4. The employer is an "equal opportunity" employer compliant with all state and federal laws pertaining to fair labor and employment practices.
5. If workers impacted by the training are represented by a union, the employer must obtain a letter of support from the union. The union letter of support must be on union letterhead and signed by a union officer or business representative.
6. Union-negotiated wages are acceptable wage levels.
7. Other factors the SCC WDB staff or service provider determines appropriate, such as the following:
 - a. The number of employees trained.
 - b. Locally established training maximums.
 - c. Restrictions on the frequency of individuals or employers participating in IWT.
 - d. An individual's current wages and benefits and goals for post training wage increases.
 - e. The existence of other training and advancement opportunities provided by the employer and/or history of successful IWT initiatives with the employer.
 - f. The number of layoffs averted as a result of the training.
 - g. Utilization as part of a larger sector and/or career pathway strategy.

The following items will be taken into consideration:

8. Each employer will be informed of the SCC WDB staff's or designated review panel's decision of the employer's eligibility to receive funding for IWT.
9. The SCC WDB staff or designated review panel will provide its rationale/reasoning to support the IWT initiative.
10. The agreement between the SCC WDB and the employer must include documentation that the six-month employment requirement is met.
11. The local IWT policy and documentation for each initiative will be retained at the local level. It is the SCC WDB's responsibility, in partnership with the employer, to ensure all training is completed and certificates of completion are obtained for each trainee and retained locally. This documentation will be subject to monitoring.

C. Employer Share/Reimbursements

Employers participating in IWT are required to share in the cost of providing training to their incumbent workers. The employer share is based on the size of the employer and will be at least:

- 10% of the cost for employers with up to 50 employees,
- 25% of the cost for employers with 51 to 100 employees, and
- 50% of the cost for employers with more than 100 employees.

Business size is determined by the total number of employees working in all California locations at the time of the execution of the IWT agreement.

The employer's proportionate share for the cost of training may include the employees' hourly wages while attending the training program as well as the cost of the training program (teacher, books and materials, etc.). The employer's contribution may be in cash or in kind, fairly evaluated, and must be tracked and documented in the agreement file. The business will be required to calculate its actual non-federal share as a part of the application for training funds and at the conclusion of the training, should the employer share not meet the limits, the funds could potentially have to be repaid. Official payroll records, time and attendance records, invoices for equipment purchased, etc. must be utilized to determine the amount of the employer's share of the cost. The employer's share must not be calculated using any other Federal funds, except where the Federal statute authorizing a program specifically provides that Federal funds made available for such program can be applied to matching or cost-sharing requirements of other Federal programs.

The SCC WDB may contribute up to \$10,000 of IWT funds per trainee. In limited circumstances, based on factors including employer size, trainee barriers, availability of funding and other applicable factors, the SCC WDB Director may provide a waiver to provide additional support up to the employer share requirement.

D. CalJOBS

Individuals

Individuals who participate in IWT must be registered in CalJOBS and have a completed Title I – Workforce Development application with Incumbent Worker eligibility. CalJOBS Activity Code 308 – IWT should be added to the application for the duration of the IWT.

It should be noted that individuals that participate in only IWT are not considered participants in

the Title I program, and thus are not included in the performance. However, the Department of Labor is requiring states to report the WIOA primary indicators of performance for individuals that participate in IWT. Additionally, the SCC WDB must use supplemental wage information for any individuals that provided a pseudo Social Security Number in CalJOBS.

Employers

The SCC WDB staff must ensure the employer participating in IWT is registered as a preferred employer in CalJOBS and that the CalJOBS Activity Code E68 – IWT is added to the employer's account.

E. Funding

IWT is part of a comprehensive business engagement strategy designed to meet the special requirements of an employer (including a group of employers) to upskill current employees. To implement this strategy, SCC WDB may use up to 20% of their total Adult and Dislocated Worker formula allocation to provide IWT (WIOA Section 134[d][4]). Since the WIOA defines IWT as a business service, the delivery of IWT does not require the use of Individual Training Accounts nor does the training program have to be listed on the ETPL. In addition, an eligible employee participating in this activity is not required to meet the eligibility requirements for Adult or Dislocated Worker career and/or training services unless they will receive another WIOA funded service in addition to the IWT.

Note – Expenditures on IWT can be counted toward the training expenditure requirement in Workforce Services Directive WSD14-1. The employer contributions for IWT can be counted as leveraged funds.

F. Key Definitions

Business/Employer – A private sector, local government, for profit, or not-for-profit place of business. Business and employer are used interchangeably in this Directive.

Career Pathway – A combination of rigorous and high-quality education, training, and other services that: aligns with the skill needs of industries in the state or local regions; prepares an individual to be successful in secondary or postsecondary education options, including apprenticeships; includes counseling to support the achievement of education and career goals; includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster; organizes education, training, and other services to meet the needs of an individual in a manner that accelerates educational and career advancement; enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and helps an individual enter or advance within a specific occupation or occupational cluster. (WIOA Sec. 3[7])

Credential or Certificate of Completion – A recognized postsecondary credential is defined as a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the state or federal government, or an associate or baccalaureate degree, as well as graduate degrees for purposes of the Vocational Rehabilitation program as required by Section 103(a)(5) of the Rehabilitation Act of 1973, as amended by Title IV of WIOA. A recognized postsecondary credential is awarded in recognition of an individual's attainment of measurable technical or industry/occupational skills necessary to

obtain employment or advance within an industry/occupation. These technical or industry/occupational skills generally are based on standards developed or endorsed by employers or industry associations. Neither certificates awarded by the SCC WDB nor work readiness certificates are included in this definition because neither type of certificate documents the measurable technical or industry/occupational skills necessary to gain employment or advance within an occupation.

Eligible Employer – For an employer to be eligible, the SCC WDB must consider: the characteristics of the individuals in the program (see IWT definition below); the relationship of the training to the competitiveness of an individual and the employer; the number of employees trained; the wages and benefits, including post training increases; the existence of other training opportunities provided by the employer; the employer must have and provide a valid California Employer Account Number; and any other factors the SCC WDB determines appropriate.

Employer Share – The contribution paid by the employer, on behalf of an employee while attending a training program. The employer's share will not be less than one of the following:

- 10% of the cost of training for employers with up to 50 employees,
- 25% of the cost of training for employers with 51 to 100 employees, and
- 50% of the cost of training, for employers with more than 100 employees.

The employer's proportionate share for the cost of training may include the employees' hourly wages while attending the training program as well as the cost of the training program (teacher, books and materials, etc.). The business size is to be based on the total number of employees at all locations operated by the employer in California.

Follow-up – Will be performed six months after reported completion of IWT to determine outcomes (i.e., retained employment, advancement, and increased wages).

Incumbent Worker – To qualify as an incumbent worker, the individual worker needs to be employed in a situation that meets the Fair Labor Standards Act requirements for an employer-employee relationship, and have an established employment history with the employer for six months or more, with the following exception: in the event that the IWT is being provided to a cohort of employees, not every employee in the cohort must have an established employment history with the employer for six months or more as long as a majority of those employees being trained do meet the employment history requirement. An incumbent worker does not have to meet the eligibility requirements for career and training services for Adults and Dislocated Workers under WIOA, unless they are also enrolled as a participants in the WIOA Adult or Dislocated Worker Program. (TEGL 10-16)

Incumbent Worker Training – Designed to meet the special requirements of an employer (including a group of employers) to retain a skilled workforce, avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment, and/or providing training that will result in progression on a career pathway and income mobility. It is conducted with a commitment by the employer to retain employees, avert the layoffs of the incumbent worker(s) trained for a period of six months following completion of the training, or promote incumbent workers to higher paying positions. It increases the competitiveness of the employer or employee and/or gives employees the opportunity to progress on their career pathway by providing opportunities to obtain certificates or credentials based on the employers need.

Incumbent Worker Training Allowable Costs – The SCC WDB share of the cost of training (e.g.,

teacher, books, materials) for the delivery of IWT. This amount excludes the cost of individual wages paid by the employer while the employee is attending/participating in the training.

Qualified Trainer – A qualified trainer can be provided in-house, by a training agency, or by a third party. Training providers should be California based, unless the training is so unique that a training provider cannot be found in California. The choice and method of training are determined by the employer.

Regional Sector Pathway – The identification, utilization, and servicing of career pathway programs aligned with regional industry sector needs in a Regional Planning Unit.

Classroom Training – Instruction in a classroom setting provided to a group of trainees, conducted by a qualified instructor.

Laboratory Training – Hands-on instruction or skill acquisition under the constant and direct guidance of a qualified trainer. Laboratory training (a.k.a. "Lab") may require the use of specialized equipment or facilities. Laboratory training may be conducted in a simulated work setting or at a productive work setting (a.k.a. Productive Laboratory).

Electronic Delivery Training – If an employee utilizes electronic delivery training, the e-learning program should either be on the Eligible Training Providers List (ETPL) or lead the employee on their career pathway with a certificate. Under the electronic delivery training method, the following options are available:

- *Computer-Based-Training* – Training delivered through a computer program at a pace set by the trainee. There is no requirement for delivery by a live trainer and training does not have to be interactive.
- *Video Conference* – Training that is live, interactive instruction provided by a trainer through a video communications session.
- *E-Learning* – Instruction delivered through a web-based system, conducted in a virtual environment utilizing web meeting/webinar.

Action: All WIOA Staff and Service Providers will comply with the attached IWT policy. This policy memorandum is on-going and effective immediately.

Inquiries: Any questions regarding this policy memorandum may be directed to the WDB Director.

Attachments: None

This policy authorized by: Workforce Development Board, May, 29, 2019



☐ Action ☐ Consent ☒ Information ☒ Discussion

A.3 NAWB Conference Report

COMMITTEE: Executive Committee	MEETING DATE: May 8, 2019
STAFF NAME: Andy Stone, WDB Director	

SUMMARY:

Rob Morse, Carol Siegel, Elyse Destout, and Andy Stone attended the annual National Association of Workforce Boards Conference in Washington D.C. and will share some of their experiences and recommendations.

☐ Attachment(s)

SUGGESTED MOTION: (if applicable)

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:



☒Action ☐Consent ☐Information ☒Discussion

A.4 WDB Officer Nominations PY 2019-20

COMMITTEE: Executive Committee	MEETING DATE: May 8, 2019
STAFF NAME: Andy Stone, WDB Director	

SUMMARY:

The Nominating Committee has not yet had a chance to convene for the purpose of developing a slate of candidates for Program Year 2019-20. Subject to this Committee's approval, the Nominating Committee has requested that it provide its recommendations directly to the full Workforce Development Board (WDB) at its May 29, 2019 meeting.

Changes and additional nominations may be made from the floor at the WDB meeting.

☐ Attachment(s)

SUGGESTED MOTION: (if applicable)

I move to approve the Nominating Committee's request to provide its recommendations for the proposed slate of Officers directly to the full Workforce Development Board (WDB) at its May 29, 2019 meeting.

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:



☒Action ☐Consent ☐Information ☒Discussion

A.5 WDB Member Recruitment Update

COMMITTEE:	Executive Committee	MEETING DATE:	May 8, 2019
STAFF NAME: Andy Stone, WDB Director			

SUMMARY:

The Workforce Innovation and Opportunity Act (WIOA) requires that the WDB have a Local Business representation majority of 51%. Our current Board representation requirement is thirteen (13) business members and there are currently three (3) business vacancies

According to the Department of Labor's Training and Employment Guidance Letter WIOA 27-14, a majority of members must be business representatives who are owners, chief executive or operating officers, or other business executives, or employers with optimum policy making or hiring authority. They are to be representatives of businesses, including small businesses, or organizations representing businesses, that provide employment opportunities in the local area in in-demand industry sectors or occupations (as defined in WIOA section 3(23)). These representatives are uniquely suited to communicate the emerging workforce needs of employers in high-growth, in-demand sectors to the Local Board.

At this meeting, the Executive Committee will discuss potential strategies and actions to ensure that the WDB meets the membership requirements of WIOA.

☐ Attachment(s)

SUGGESTED MOTION: (if applicable)

I move to accept the WDB Member Recruitment Update.

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:



☒Action ☐Consent ☐Information ☒Discussion

A.6 WDB May 29, 2019 Meeting Planning

COMMITTEE: Executive Committee	MEETING DATE: May 8, 2019
STAFF NAME: Andy Stone, WDB Director	

SUMMARY:

The next Workforce Development Board (full board) meeting is scheduled for May 29, 2019. WDB staff request that your committee discuss and develop the agenda outline for that meeting. Your committee should consider possible items for presentation and break out discussions at the May 29, 2019 full board meeting.

☐ Attachment(s)

SUGGESTED MOTION: (if applicable)

I move to direct that the WDB staff include the following items in the May 29, 2019 WDB meeting agenda:

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:



☐Action ☐Consent ☒Information ☒Discussion

A.7 Watsonville Career Center Update

COMMITTEE:	Executive Committee	MEETING DATE:	May 8, 2019
STAFF NAME: Andy Stone, WDB Director			

SUMMARY:

In May of 2017, an EDD representative reviewed the Watsonville facility for compliance with EDD's seismic and accessibility standards. While the facility passed the seismic screening, the reviewer cited twelve (12) instances where the facility did not meet EDD's accessibility requirements. Although the building does not meet EDD's accessibility standards, Santa Cruz County believes that the facility meets the legal accessibility requirements. That said, EDD provided Santa Cruz County with two years to resolve the listed issues before it would need to move its staff member to the Capitola office. Santa Cruz County was able to resolve three (3) of the identified issues, pertaining to signage and plumbing insulation. The remaining nine (9) items concern the accessibility of the drinking fountain, bathroom stalls and parking spaces. Santa Cruz County has notified the building owner and the City of Watsonville (parking lot owner) of EDD's findings, but has not been successful in securing the requested changes.

Santa Cruz County intends to continue to work with EDD and the owners of the building and parking lot to arrive at a mutually agreeable solution. In the meantime, the Workforce Development Board staff will seek alternatives that will allow Watsonville residents to access EDD services through technology or other means.

☐Attachment(s)

SUGGESTED MOTION: (if applicable)

COMMITTEE DATE	COMMITTEE APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other:
BOARD DATE	BOARD APPROVAL: <input type="checkbox"/> Yes <input type="checkbox"/> No Other: