



WIOA Transitional Job Policy

Policy Memorandum 20-02, rev. 1

Date: February 14, 2025

To: All Workforce Innovation and Opportunity Act (WIOA) Contracted Service Providers (WIOA service providers)

Purpose: To provide guidance to WIOA service providers for transitional jobs, as a type of work experience opportunity, offered as an individualized career service for WIOA eligible clients.

Rescissions: WIOA Transitional Job Policy 20-02, approved by Workforce Development Board on December 9, 2020

References: WIOA Sections 3, 134 (c)(3)(D); 20 CFR 680.200; 20 CFR 680.190-195; 20 CFR 680.840; 20 CFR 680.900; 20 CFR 683.270; Employment and Training Guidance Letter (TEGL) WIOA, No.19-16 (March 1, 2017); Employment Development Department (EDD), Workforce Services Directive (WSD)24-05, CalJOBS Activity Codes (October 10, 2024)

Background:

The Santa Cruz County Workforce Development Board (WDB) will make available work experience opportunities through a transitional jobs program for those Workforce Innovation and Opportunity Act (WIOA) eligible Adult and Dislocated Worker participants with barriers to employment who are chronically unemployed or have inconsistent work history. Providing this type of opportunity aligns with the WIOA mission/vision of strengthening our nation's public workforce system, helping Americans with barriers to employment access the education, training and support services needed to obtain and advance in quality jobs and careers.

At the discretion of the local Workforce Development Board, this Transitional Job Policy is subject to change.

Policy:

A. General Provisions

A transitional job, combined with job readiness skills training, is designed to assist participants with establishing a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment. Transitional jobs provide participants with work experience and an opportunity to develop important workplace skills within the context of an employee-employer relationship.

B. Local Policy Guidelines and Requirements

1. Eligibility

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

To be eligible for a transitional job, the participant is experiencing one of the following:

- a. Barriers to employment, defined as being a member of one (1) or more of the following populations¹:

¹ WIOA Section 3 (24)

1. Displaced homemakers,
 2. Low-income individuals,
 3. Indians, Alaska Natives, and Native Hawaiians as defined in Section 166,
 4. Individuals with disabilities,
 5. Older individuals,
 6. Ex-offenders,
 7. Homeless individuals,
 8. Youth who are in or have aged out of the foster care system,
 9. Individuals who are English language learners, individuals who have low levels of literacy, and individuals who are facing substantial cultural barriers,
 10. Eligible migrant and seasonal farmworkers, as defined in Section 167(i),
 11. Individuals within two (2) years of exhausting lifetime TANF eligibility,
 12. Single parents,
 13. Long-term unemployed; **and who are**
- b. Chronically unemployed, defined as long-lasting or habitual and problematic **or**
- c. Inconsistent work history, despite being able and willing to work, defined as never held a job or gaps in work history that cannot be explained by recent economic conditions.

Eligibility for WIOA is documented via CalJOBS data entry and case file records. Eligibility for transitional job program must be documented in the case file records and may be accomplished via an assessment and self-attestation.

2. Individualized Career Services

As part of the WIOA menu of services offered as an individualized career service, a WIOA eligible participant may be eligible for a type of work experience as a WIOA funded subsidized job placement. Transitional jobs must be combined with comprehensive career services and supportive services.

The **assessment** of the individual will determine the need, length of the transitional job and the skills needed for entry into and retention in unsubsidized employment. An **Individual Employment Plan (IEP)** shall be developed with the transitional job identified as part of the overall employment goals for the individual.

Job readiness skills training shall be offered in conjunction with the transitional job placement to address existing challenges and develop successful outcomes. Job readiness skills training provides the tools necessary to be successful in the workplace and will include competencies needed to perform specific tasks on the job. Job readiness skills training shall be provided via the WDB approved platform or WIOA service provider method approved by the WDB Director. Job readiness skills training shall include, but is not limited to, the following components:

- ✓ Personal maintenance
- ✓ Punctuality
- ✓ Attendance
- ✓ Dependability

As the transitional job placement is nearing completion, **Job Search** assistance shall be provided to assist the individual with obtaining unsubsidized employment. Job Search assistance shall be provided via the WDB approved platform or WIOA service provider methodology approved by the WDB Director.

Job search assistance shall include the following components:

- ✓ resume writing,
- ✓ interviewing skills
- ✓ networking, and
- ✓ customized job search strategy, including specific labor market information

Other individualized career services that may be offered and provided to the individual include the following:

- ✓ Financial Literacy Services
- ✓ Career Planning
- ✓ English language acquisition and integrated education and training programs

Appropriate corresponding CalJOBS activity codes and case note entries shall be created by the WIOA service provider as indicated in section 6 below.

3. Benchmarks/Progress Reports

WIOA service provider shall document the Job Readiness Skills training benchmarks completed over the course of the transitional job placement when the individual is 50% completed and again at the conclusion of the placement.

The employer will also provide an evaluation to document the overall individual employment performance during the course of the placement.

WIOA service provider shall use the WDB approved Progress Report form or submit a version for WDB approval.

As a real-time WIOA performance measure, WIOA service provider shall track the individuals' performance using the Measurable Skills Gains – Skills Progression fields in CalJOBS.

4. Compensation

A transitional job must be a paid work experience. Wages for participants in transitional job placements shall, at a minimum, meet the applicable State and Federal minimum wage requirements in place at the time of the transition job placement. The participant may be paid the wage applicable to the assigned position with a corresponding job description within the business.

WIOA service provider shall be reimbursed at 100% of the wage. Participants shall only be paid for the hours worked during the transitional job period and documented on the participants timecard.

The overall compensation shall be capped at the amount in the local Individual Training Account (ITA) policy, for in-demand employment opportunities, in place at the time the transitional job starts.

5. Length of placement/training time limits

Placements will be limited in duration as appropriate to the needs of the individual. The length of training time shall not be less than 240 hours and shall not exceed six (6) months or 1040 hours, transitional jobs shall be for a minimum of twenty (20) hours per week.

6. CalJOBS Data Entry

Transitional Job activities shall be tracked via the CalJOBS, the state case management system, including but not limited to the following:

a. Activity Codes

- Initial Assessment: Activity Code: 102
- Objective Assessment: Activity Code: 203
- **Development of Individual Employment Plan (IEP); Activity Code: 205**
- Short-Term Prevocational Services: Activity Code: 215
- **Job Readiness Training: Activity Code: 322**
- **Transitional Job: Activity Code: 321**
- Job Search: Activity Code: 125
- **Supportive Services:** Activity Codes 180-192: as appropriate based on service provided

Bolded activities **must** be combined when participating in a transitional job.

b. Case Note Entry

WIOA service provider staff shall create a CalJOBS case note entry to document the rationale for the transitional job placement and supportive service provided and to detail each activity. For example:

Subject: Transitional Job Factors

Case note should address the following: individual barrier; chronically unemployed or inconsistent work history rationale/justification.

Subject: Supportive Services (TJ)

Case note should document the need for supportive services, following the local supportive service policy parameters.

WIOA service provider shall create a CalJOBS case note entry to justify any policy exceptions authorizations.

7. Work Site Exclusions

WIOA funds may not be used for a work experience that promotes or supports the use, possession or distribution of cannabis (marijuana).

C. WIOA Contracted Service Provider Responsibilities/Employer of Record

WIOA service provider shall comply with this local transitional job policy and shall be monitored for compliance with provisions. WIOA service provider shall ensure that records and documentation required for policy compliance are kept in the case file and made available 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.

WIOA Adult and Dislocated Worker service provider shall be the *Employer of Record* for transitional jobs participants. As the *Employer of Record*, the contractor shall utilize the following document/forms for this program:

1. Worksite Agreement

This documents the employer/business name, placement job title, duration of job placement, rate of pay and WIOA required elements for participation (i.e. WIOA Section 188). The agreement must be signed by all parties prior to the start of the transitional

job activity. This document shall be provided to the WDB contract analyst upon being executed between the employer and the WIOA service provider.

2. Timecard

This provides documentation signed by both employer and WIOA participant attesting to the hours worked in a pay period (either weekly or bi-weekly).

3. Transitional Job Progress Report

This provides a status, by the employer, on the participants job readiness skills during the transitional job placement.

WIOA service provider shall submit an invoice cover page, timecards and progress reports to the WDB Contract analyst on a monthly basis for WIOA service provider reimbursement from the County WDB funds.

WIOA service provider shall be responsible for creating the corresponding data entry codes in CalJOBS.

In the event, the service provider desires to create forms to enhance the flow of the transitional job program, WDB Director or designee must first approve the forms. Approved forms shall be made accessible via *Dropbox*. Upon approval, the service provider shall train their staff on any new forms and/or procedures.

D. Employer Requirements

Employers willing to work with participants in transitional job activities may be from the public, private or non-profit sectors. Employer must be able to provide supervision, complete the timecards, employment evaluation and/or progress reports as required (or at designated intervals: ½ way through and conclusion).

This work experience opportunity may not be used to directly or indirectly aid in filling a job opening which is vacant because the former occupant is on strike or is being locked out in the course of a labor dispute, or the filling of which is otherwise an issue in a labor dispute involving work stoppage.

There is no expectation that the employer will retain the participant at the completion of the transitional job. However, if the employer is interested in hiring the participant after the transitional job activity has been completed, and additional training is needed, an On-the-Job-Training (OJT) may be developed that follows the requirements of the local OJT Policy.

E. Supportive Services

Transitional jobs must be combined with supportive services. WIOA case manager will arrange for the WIOA eligible participant to receive supportive services concurrently. WIOA service providers will arrange for supportive services during the job placement period to eliminate barriers and improve retention according to the WDB's *Supportive Service Policy*. This may include work clothing, tools, childcare, finger printing, and transportation assistance. The need for supportive services will be documented in the Employment Plan or Career Advancement Plan, as well as CalJOBS case notes. The need will be revised as appropriate.

Supportive services are paid based on an approved invoice and backed up by receipts and/or provider signatures. Supportive Services claims will be submitted on a monthly basis but no later than 30 days after the conclusion of the training activity.

CalJOBS data entry: Activity Code corresponds to the Supportive Service category. Using the CalJOBS Advanced Individual Fund Tracking (AIFT) portal, WIOA service providers will track Supportive Service amounts authorized and stay within budget allocation and the WDB *Supportive Service Policy*.

F. Availability of Funding/Funding Limitations

Santa Cruz County Workforce Development Board (WDB) may use up to 10% of the combined adult and dislocated worker local allocations for transitional jobs. County Fiscal Staff will track the annual funding allocated to the transitional jobs program. Transitional Job funds distribution is ultimately contingent upon the availability of funds.

G. Exception to policy

Under special circumstances, on a case-by-case basis and with proper justification, WIOA service providers could request a waiver of a policy provision **regarding duration of the placement and or exceeding the ITA amounts (as per local ITA policy)** from the WDB Sr. Analyst and with approval from the Workforce Development Board Director.

WIOA service providers should submit an ITA Policy Exception Memo (Attachment III) with the explanation and justification for the exception.

Action: All WIOA service providers shall comply with the attached Transitional Job policy. This policy memorandum is on-going and effective immediately.

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

Documents/forms referenced:

- I. Transitional Job Worksite Agreement
- II. Transitional Job Progress Report
- III. Policy Exception Memo

This policy authorized by: Santa Cruz County Workforce Development Board, December 9, 2020, revised March 19, 2025.

Goodwill Central Coast WIOA Transitional Job Worksite Agreement

Worksite AGREES:

1. To provide the above-named participant a temporary job listed above, to provide supervision and instruction regarding duties and work activities, and to orient the participant to the business's policies, specific job responsibilities, procedures, safety instructions, and regulations. This orientation will also include appropriate dress, work hours and break times, and other expectations. To provide equipment necessary for injury and damage prevention.
2. To provide consistent job readiness training in addition to the aforementioned work duties/activities, such as punctuality, customer service, communication, teamwork, and appropriate workplace behaviors.
3. The WIOA participant will be working under the same standards, conditions, benefits (except Unemployment Insurance) as similarly-situated regular employees, and these conditions will comply with all State and Federal regulations governing health and safety, Worker's Compensation, and labor laws.
4. To complete and distribute an Employee Progress Report monthly to the participant, Goodwill Central Coast, and WIOA Employment Specialist, as well as a final evaluation in the format of the Worksite's choosing.
5. To keep accurate records of the participant's attendance, and complete the Time Card/Progress Report (attached) at the end of each month and submit it to the Goodwill WIOA Employment Specialist in person or email to tjsservices@workforcescc.com; (831) 763-8516.
6. To notify the WIOA Employment Specialist ASAP of any difficulties the site may be experiencing with the new hire during the agreement period (i.e. attendance, communication, or performance issues). The site will notify the WIOA Employment Specialist listed above of any significant change in job position/main duties (promotion, demotion, reassignment, hours change, etc.), or before terminating the participant for any reason. The site agrees to provide WIOA Staff a completed Time Card/Claim within three (3) days of termination.
7. To ensure that participant work hours do not fall below the number of hours specified in this agreement.
8. To allow the participant time off to complete required job search activities as needed and once per week during the final month of participation.

GOODWILL CENTRAL COAST AGREES:

1. To visit and/or contact the Transitional Job Site on a schedule to be mutually agreed upon for: picking up Time Cards/progress reports, to ensure satisfactory progress of new employee, and/or to coordinate supportive services needed by site or participant.

GENERAL PROVISIONS:

1. This agreement may be terminated by either party upon ten (10) days advance written notification. The site agrees not to terminate the employee without first notifying the WIOA Employment Specialist listed above. This agreement may be terminated at the discretion of the WIOA Staff if funding becomes unavailable, or if the site:
 - a) Fails to meet the performance criteria specified in this agreement.
 - b) If a participant is unable to continue in the program, as determined by WIOA Employment Specialist.
2. Goodwill Central Coast is a California Non-profit Corporation 501 (c) 3 and or is authorized to implement the WIOA Transitional Job program by the County of Santa Cruz Workforce Development Board.
3. No person shall be denied training or employment; excluded from benefits, or discriminated against because of race, color, religion, sex, national origin, age, handicap, physical or mental disability, medical condition, marital status, sexual orientation, or political affiliation or belief.
4. A Transitional Job position may not be created as the result of, and may not result in, any of the following: Displacement of current employees, including overtime currently worked by these employees; the filling of positions which would otherwise be promotional opportunities for current employees; the filling of a position, prior to compliance with applicable personnel procedures or provisions; the filling of a position created by layoff, or reduction in workforce; the filling of a work assignment customarily performed by a worker in a job classification within a recognized collective bargaining unit in that specific worksite, or the filling of a work assignment in any bargaining unit in which funded positions are vacant or in which regular employees are on layoffs; a strike, lockout, or other bona fide labor dispute, or violation of any existing collective bargaining agreement between employees. Activities under this agreement shall not violate any provisions limiting sectarian or political activities.

Goodwill Central Coast WIOA Transitional Job Worksite Agreement

SIGNATURES

The undersigned approve this agreement. This agreement will not take effect and no person shall begin working until this agreement is signed and dated by all parties and returned to the WIOA Employment Specialist listed above.

IN WITNESS WHEREOF, this agreement has been executed by and on behalf of the parties signed below:	
FOR PARTICIPANT: _____ Print Name _____ Signature _____ Date _____ Phone Number	FOR GOODWILL CENTRAL COAST: _____ Print Name and Title of Authorized Signer _____ Signature _____ Date _____ Phone Number
FOR TRANSITIONAL JOB WORKSITE: _____ Print Name and Title of Authorized Signer _____ Signature _____ Date _____ Phone Number	

Goodwill Central Coast Transitional Job Monthly Progress Report

WIOA Participant: _____

Employer: _____

Month: _____

EVALUATION

Place "X" in appropriate box	Excellent	Very Good	Satisfactory	Needs Improvement	Comments
1. Attitude (Wants to learn and work hard)					
2. Cooperation (With supervisor)					
3. Dependability (Follows directions completely and well)					
4. Punctuality (Arrives to work on time)					
5. Work Habits (Knows what to do as a daily routine)					
6. Initiative (Doesn't stand around; asks to do new things)					
7. Quality of Work (Neatness, accuracy, and organization)					
8. Relationship With Co-Workers					
9. Personal Appearance (Appropriate dress, cleanliness, neatness)					

SKILL LEVEL

Fill in job-specific duties from Job Description	Excellent	Very Good	Satisfactory	Needs Improvement	Comments
1.					
2.					
3.					
4.					
5.					
6.					
7.					

Overall Evaluation (circle one)

Excellent

Very Good

Satisfactory

Needs Improvement

Employer's Signature

date

Participant's Signature

date

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 A/DW Policy:
 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 below*

Comments:

WIOA service provider supervisor:

Authorized Signature

Workforce Development Board Staff Approval: Yes No: *Explain in comment section below*

WDB Director and/or Designee Signature

Comments:

Return original to sender for participant's case file.