

### Mississippi Valley Workforce Development Board

### **Executive Committee Agenda**

Tuesday, April 4, 2023, at 5:00 p.m.

### Join Zoom Meeting

https://us02web.zoom.us/j/89984623069?pwd=NDVsVzN4bzN5anRpUExrVG5PcmV0dz09

Meeting ID: 899 8462 3069 Passcode: 899588 One tap mobile: tel:+13126266799,89984623069

Called to Order	Dennis Duke
Roll Call	Mandy Tripp
*Excused Absences	Dennis Duke
*Approval of Agenda	Dennis Duke
*Approval of Previous Minutes	Dennis Duke

### **Standing Committee Reports**

Finance Committee Report (Page 6)

Operations Committee Report (Page 8)

Youth Committee Report (Page 10)

Business Committee Report (Page 12)

Mandy Parchert

### **New Business**

*Modify Retrain & Retain Policy (Page 14)	Mandy Parchert
*Local Grant Recipient (Page 26)	Jim Irwin

\*Hiring Policy (Page 28)

Miranda Swafford

\*Grant A Station (Page 23)

\*Support Services Modification (Page 33)

\*OSO Q2 KPI Report

IWD Monitoring Report (Page 42)

Mandy Tripp

Youth Performance (Page 47)

ADA Concerns

Miranda Swafford

Miranda Swafford

Social Media Update

Board Staff Update

Miranda Swafford

Matthew Nicol

Miranda Swafford

Other Business Public Comment

Adjourn Dennis Duke

### **Accommodations**

Accommodations are available upon request for individuals with disabilities. If you need accommodation, please contact Andrea Taylor at <a href="mailto:associate@mississippivalleyworkforce.org">associate@mississippivalleyworkforce.org</a> or at 1-844-967-5365 option 2.

<sup>\*</sup>Items Requiring a Vote \*\* Items Requiring a Roll Call Vote



### Mississippi Valley Workforce Development Board

## **Executive Committee Meeting Minutes**

Tuesday, March 7, 2023, at 5:00 p.m.

Members Present: Dennis Duke, Lori Bassow, Jacob Nye, Mathew Nicol, Kirby Phillips, and

Cindy Whalen

Members Absent: none CEOs Present: Jim Irwin

Staff Present: Miranda Swafford, Executive Director, Andrea Taylor, Associate Director and

Mandy Tripp, Executive Assistant

### **CALLED TO ORDER**

Duke called the meeting to order at 5:00 p.m.

### **QUORUM**

The committee had a quorum to conduct business.

### **EXCUSED ABSENCES**

There were no excused absences.

### APPROVAL OF AGENDA

Nicol made a motion to accept the agenda as presented, seconded by Nye, and the motion was carried.

### APPROVAL OF MINUTES

Nicol made a motion to approve the previous meeting minutes, seconded by Whalen, and the motion carried.

### **COMMITTEE REPORTS**

### **FINANCE COMMITTEE**

Bassow advised there are no issues with invoices. There is a transfer request on the agenda. A motion is also in front of the finance committee to reduce the mileage rate, but it was tabled until they were given further information.

### **NEW BUSINESS**

### \*TRANSFER ADULT/DW REQUEST

Swafford advised the finance committee voted to recommend it come to this committee to vote to approve the transfer of \$30,000 in funds from the Adult budget to the Dislocated Worker budget. This is normal for this time of year as more staff salaries have been allocated to the dislocated worker program from the adult program due to the number of trade participants currently being served. Nye made a motion to approve the transfer request, seconded by Phillips, and the motion carried.

### **\*VR SUMMER PROGRAM REQUEST**

Whalen gave an overview of the summer program and felt it was a good opportunity to pair with a local company, Fat Jimmys to provide lunch for participants the cost would be approximately \$270. Swafford advised the TTW food line-item budget has funds already committed to WBL Coffee Talk events, so the funds would need to be moved from the unobligated line item to cover it. Jacob made a motion to approve the VR Summer program request and move the funds seconded by Nicol and the motion was carried.

### \*YOUTH LOGO/BRAND

Tripp advised TAG met with Kendra, Matthew, Miranda, and her about a month ago and came back with this design this past week. The TAG Team gave their meaning behind the logo color choices and the word Accelerate. Nye made a motion to approve the Accelerate Iowa logo, seconded by Nicol, and the motion carried.

### **PERFORMANCE**

Swafford discussed the concerns regarding the youth performance levels and that if we do not meet performance goals two years in a row IWD can force realignment. Nye advised the youth committee has approved everything that has been brought to them to try to reach the goals. Concerns from Phillips about the performance in the Dislocated Worker program as well, discussing if steps need to be taken now to meet those standards in the next two quarters or if we will be behind in seeing the performance measures met since they do take time even after initiatives are put in place. The board members requested a meeting be set up with Cherisa from Equus to discuss what can be done to meet the required performance levels.

### **ADA CONCERNS**

DAS advised since the concerns are not on the space leased, they will not be addressing the concerns. Whalen advised perhaps the mall should be notified to see if they can rectify the issues. Swafford advised she can respond to IWD and let them know the concerns will be brought to the mall's attention.

### **MAY-IN PERSON MEETING**

Duke suggested having the meeting in Muscatine or the QCA, it was discussed and determined Muscatine would be closer for everyone. Phillips volunteered MPW or renting the Discovery Center. Nicol advised HNI could host it in the larger space at the HON Headquarters building. It

was decided a doodle poll will be sent out to decide on a time on May 15, 2023, to have the meeting, perhaps earlier to accommodate those who have to travel for the meeting.

### **DRAFT HOUSE STUDY BILL 126**

Swafford advised the document in the packet is a quick overview of the changes that will be coming to IWD if this bill passes. Whalen advised she did not believe Vocational Rehabilitation Services would see any changes in staff or leadership.

### **BOARD STAFF UPDATE**

Swafford advised the staff is doing local monitoring and the board is applying for the Job Quality Academy since we have it in writing there is no contractual agreement if chosen to participate. Taylor gave an overview of the progress of the Retrain & Retain Grant applications/interest forms that are starting to come in at this time we have had 11 interest forms completed.

### **OTHER BUSINESS**

There was no other business.

### **PUBLIC COMMENT**

There was no public comment.

### **ADJOURN**

Nye made a motion to adjourn, seconded by Nicol, the motion carried, and Duke adjourned the meeting at 5:56 p.m.

Finance Committee Report

## WIOA Financial Report Expenditures Through 2/28/2023 (Approximately 58.3% through Program Year)

			Funds That End		
Stream	Expended	<b>Available Spent</b>	Total Available	Remaining Balance	6/30/2023
Admin	\$216,403.43	43.87%	493,239.02	\$276,835.59	\$167,124.02
Adult	\$643,628.14	53.36%	1,206,299.97	\$562,671.83	\$212,751.97
Dislocated Worker	\$498,749.95	58.56%	851,657.99	\$352,908.04	\$180,288.99
Youth	\$877,138.59	45.47%	1,929,200.47	\$1,052,061.88	\$659,066.47
Nat. DW Grant	\$31,534.30	13.47%	234,163.40	\$202,629.10	\$234,163.40
Total	\$2,267,454.41		4,714,560.85	\$2,447,106.44	\$1,453,394.85

### Equus Program Expenditure Updates through 2/28/2023

Adult	Budget	ed	% of Total	Actual to D	ate	% of Total Spent
Total P&O		558,632.02	54.07%	\$	278,404.22	49.45%
Total Participant		474,445.46	45.93%	\$	284,582.02	50.55%
Total	\$	1,033,077.48	100.00%	\$	562,986.24	100.00%

### Unrestricted Funding

Expended	Total Available
4,153.04	43397.4

DW	Budgete	ed	% of Total	Actu	ıal to Date	% of Total Spent
Total P&O		439,513.28	64.78%	\$	263,149.50	62.54%
Total Participant		238,922.21	35.22%	\$	157,589.45	37.46%
Total	\$	678,435.49	100.00%	\$	420,738.95	100.00%

Youth	Budgeted	% of Total	Actual to Date	% of Total Spent
Total P&O	1180830.72	66.36%	\$ 674,231	1.87 85.10%
Total Participant	598547.16	33.64%	\$ 118,031	14.90%
Total	\$1,779,377.88	100.00%	\$ 792,262	2.97 100.00%

WEP	Required to Date	Actual	% Met	% Required	Note: PY21 carryover funding 20% work experience
	\$149,716.68	\$ 141,173.03	1	<mark>16.09%</mark>	20% requirement has been met

# Operations Committee Report



### Mississippi Valley Workforce Development Board

### Operations Committee Meeting Report Prepared for April 4, 2023 Executive Committee Meeting

### **One-Stop Operator Report Review**

- Burlington averaged 28 visitors per day in February Davenport had an average of 62 visitors per day in February.
- Facebook's total reach in Davenport was 6,118 in February. Burlington's Facebook total reach was 29,403 in February.
- Customer satisfaction was 85% in February and the complaints remain consistent with the Iowa WORKS system being difficult to navigate and trouble reaching a person for phone assistance.

### Adult/DW/RR Report

- February had 5 Enrollments in Adult, 0 in Dislocated Worker, and 0 NDWG.
- No participants entered occupational skills training and 6 WBL.
- Two retail store closures Bed Bath and Beyond and Tuesday Mornings were provided with rapid response resource folders.
- Legacy in Action reports a 90.63% customer satisfaction rate.

### **Title III Review**

- Burlington office served 497 distinct users in February with Davenport serving 939
- There were 93 Title III enrollments in February for Burlington and 169 for Davenport

Youth Report



### Mississippi Valley Workforce Development Board

## Youth Committee Report Prepared for April 4, 2023 – Executive Committee Meeting

### **Items of Discussion**

- Conversations continue on how to meet youth performance goals.
- Better tracking of stipends and incentives to determine effectiveness and usage over time.
- Discussion on bringing in a consultant for Youth Strategy Development, in the process of gathering data and speaking with Kim Warren from AIM (Align Impact Muscatine) on their success in Muscatine with a similar project.
- Transfr VR has launched an Augmented Reality (AR) app that allows anyone to download it and explore careers from a tablet or phone. A rep joined our last meeting and gave a walk-through on the app, it could be used in many settings to start the conversation on career exploration. Iowa has not been loaded to the site yet but will be by October, however, Illinois data is in the app to use as a reference point.

### **Equus Report**

- 10 OSY enrolled in February and 1 entered into Occupational Skills Training.
- 40 Stipends were paid, and 16 incentives were paid out.
- Outcomes were 1 ISY work experience, 1 OSY internship started, 1 CDL, 6 Measurable skill gains, 1 HISED completion, and 5 unsubsidized employments.
- VR headsets had 55 unique users with 64 SIMS started and 17 completed.

**Business Committee Report** 



### Mississippi Valley Workforce Development Board

## **Business Committee Report Prepared for April 4, 2023 – Executive Committee Meeting**

### Highlights

- Voted to modify Retrain & Retain to remove retail from the list of ineligible employers.
- Struggling with getting business satisfaction surveys completed and returned.
- We have received 14 interest forms and had a lot of meetings with companies about the grant but have not received an official application.

\*Retrain & Retain Grant Updates



### Mississippi Valley Workforce Development Board

# RETRAIN & RETAIN GRANT PROGRAM POLICY, GUIDELINES, AND PROCEDURES

**Approved Date:** 11/21/2022

Effective Date: 1/1/2023

### **PURPOSE**

The Mississippi Valley Workforce Development Board (MVWDB) establishes this local policy, guidance, and procedures for the Workforce Innovation and Opportunity Act (WIOA) Incumbent Worker Training (IWT) Program as outlined in WIOA Section 134 et.al. [29 U.S.C. 3174]. This program will be referred to as the Retrain & Retain (R&R) Grant Program in the Mississippi Valley Workforce Area (MVWA).

### **BACKGROUND**

*Incumbent Worker Definition* - An Incumbent Worker is a person who is currently employed and could benefit themselves and their employer by upgrading their skills through training. The training should give the employee the opportunity for advancement and wage gains within their company. Incumbent Workers will be referred to in the R&R Grant Program as "employees."

R&R Grants are designed to meet the special requirement of an employer to retain a skilled workforce or avert the need to lay off employees by assisting the workers in obtaining the skills necessary to retain employment. Grants provide both workers and employers with the opportunity to build and maintain a quality workforce. Mississippi Valley R&R Grant Program is a business-driven program designed to meet the needs of an employer or group of employers. There is an expectation that the employee will be promoted or retained by the company after they receive training. Ideally, this would also create additional back-fill opportunities for other workers.

The program is intended to offset a portion, via reimbursement, of the business's cost to train and upgrade the skills of its employees. Eligible businesses must demonstrate that by receiving funding assistance through the program, their business will not only improve the skills of their workers but also improve their business processes and competitiveness and decrease the risk of permanent layoffs.

### **PROGRAM OVERVIEW**

Grant funds are limited and therefore will be awarded through an application process. The maximum award per grant, per year, is \$10,000 and the initial training agreement duration may not exceed 12 months. The maximum award may be adjusted based on funding availability, each program year. The total amount of funding available for all training projects from July 1, 2022 – June 30, 2023, is \$50,000. A notification will be posted on <a href="https://www.mississippivalleyworkforce.org">www.mississippivalleyworkforce.org</a> when funds are no longer available. Grant deadlines are as follows for the current available funding:

Applications Accepted	<b>Due Date</b>	Award Notification
February 1, 2023 – March 1, 2023	March 1, 2023	March 15, 2023
March 1, 2023 – April 1, 2023	April 1, 2023	April 15, 2023
April 1, 2023 – May 1, 2023	May 1, 2023	May 15, 2023

When workers lack necessary training and businesses experience skill gaps, the company's ability to compete, expand and retain workers can be compromised. Mississippi Valley R&R Grant Program addresses such needs. The Grant Program is to provide funding for continuing education and training of employees at existing Iowa businesses with physical locations in the MVWA. The program will provide reimbursement grants to businesses that pay for preapproved direct training-related costs.

The program helps established MVWA businesses to upgrade the skills of current employees, which provides enormous benefits including:

### For employers:

- Increased Competitiveness
- Skilled Workforce
- Increased Productivity
- Increased Profits
- Company Growth
- Reduced Turnover

### For employees:

- Advancement Opportunities
- Increased Job Opportunities
- Industry Recognized Credentials
- Job Retention
- Transportable/Transferrable Skills
- Improved Morale and Work Culture

### **ELIGIBLE EMPLOYEES**

An eligible employee is one who is directly employed by the company at a facility located within the MVWA and meets these requirements:

- 1. Employee must be at least 18 years of age.
- 2. A citizen of the United States or a non-citizen whose status permits employment in the United States

- 3. Iowa resident
- 4. Employee must work at least 32 hours per week
- 5. Employee must have an established employment history with the employer for six months or more and receives a W-2.
- 6. Employee must be committed to attending all trainings.
- 7. Employee must earn an hourly wage above the state minimum wage.
- 8. Employee must agree to cooperate with data collection requirements.
- \*An employee does not have to meet the eligibility requirements for participation in career and training services for Adults and Dislocated Workers under WIOA unless they are also enrolled as a participant in the WIOA Adult or Dislocated Worker program.
- \*\*There is an exception to the six-month requirement: In the event, R&R funding 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 (at least 51%) of those employees being trained meet the employment history requirement.
- \*\*\*R&R funding can also be used for underemployed if workers if the use of the funding focuses on increasing skills for underemployed frontline workers in an effort to advance these workers to more skilled positions with the same employer; or workers who would prefer full-time work but are working part-time for economic reasons.

### **INELIGIBLE EMPLOYEES**

- Anyone who receives a 1099 Form: or
- Those who are placed through a temporary agency.

### **EMPLOYER ELIGIBILITY**

Employers applying for an R&R Grant <u>must</u> meet the following criteria:

- Financially viable, private sector employers and certain nonprofit and local government entities (e.g., a nonprofit or county hospital) are eligible to receive R&R funds.
- The business or businesses must have been in operation for 12 months, not currently or recently experiencing bankruptcy, be current on all local, state, and federal tax obligations, and not appear on any federal suspensions or debarment lists.
- An eligible business must be located in Iowa and registered with the Iowa Secretary of State Office and have a physical location in the Mississippi Valley Workforce Area (MVWA).
- Businesses are encouraged to provide training to a group of employees and not individual training, although the number of employees in the company will be taken into consideration.
- Businesses should also demonstrate a commitment to retain or avert the layoff of employees receiving training.

Companies that are in the process of a layoff or have had a layoff in the last six months are not eligible for the R&R Grant Program (excludes temporary hires or contract workers.) If a layoff

occurs in a company while they have an open R&R Grant, the current workers will be able to complete the training.

### MULTIPLE BUSINESS APPLICATIONS

A group of employers who need the same training for their workers may submit a joint application. Multiple businesses can collaborate and apply for a collaborative training grant. The proposal for the common request must:

- Train employees of at least two different businesses, with one of those businesses designated as the Lead Applicant.
- Include employees of the Lead Applicant in the training.
- Include training descriptions and outcomes that address the employees from all businesses impacted by the proposed common training
- Include information on each business that will be part of the training.

A business may be treated as a single company or multiple companies depending on the number of locations and Federal Employer Identification Number (FEIN). If each location operates under a different FEIN, each location will be considered a separate company and will need to submit separate applications to receive separate awards. If the locations operate under one FEIN, it will be considered one company and will therefore need to join its training efforts, submit one application, and receive one award.

### INELIGIBLE EMPLOYERS

### The following businesses are <u>not</u> eligible to apply for funds under this program:

- Not-for-profit agencies or organizations. [Note: This does not apply to hospitals operated by nonprofit or local government entities in the State of Iowa)
- Retail establishments.
- Entities whose administrations only comprise volunteers.
- Local Workforce Development Boards and their administrative entities.
- Labor unions.
- Federal, state, county, or city governmental entities [Note: This does not apply to hospitals operated by nonprofit or local government entities in the State of Iowa)
- Businesses that received an R&R Grant award in the current program year.

### **FUNDING CONSIDERATIONS**

Funding considerations shall be given to the following:

- Businesses that provide employees with opportunities to acquire new or improved skills by earning a credential.
- Businesses whose grant proposals represent a significant upgrade in employee skills.
- The characteristics of the participants in the program, specifically the extent to which they historically represent individuals with barriers to employment as defined in WIOA

sec. 3(24), and how they would benefit from retention or advancement.

- The employees' advancement opportunities along with wages and benefits (both pre-and post-training earnings.
- The existence of other training and advancement opportunities provided by the employer.
- Layoffs averted because of the training.
- Utilization as part of a larger sector and/or career pathway strategy; or
- Employer size

While these considerations do not include an increased reimbursement percentage, applications that meet one or more of these conditions will receive priority during times of limited funding.

### **EMPLOYER'S COST-SHARING REQUIREMENT**

Businesses will be required to provide a portion of the training costs dependent upon the size of the business and the number of employees either through direct cost contribution or in-kind contributions.

- At least 10% of the cost for employers with 50 or fewer employees.
- At least 25% of the cost for employers with 51 to 100 employees.
- At least 50% of the cost for employers with more than 100 employees.

The business must disclose cash and in-kind contributions. Examples of in-kind contributions, in addition to any direct costs, may include expenses associated with the use of space and equipment during the training project and trainee wages (including benefits) of employees during the training.

### PERFORMANCE ACCOUNTABILITY

The employer must agree to provide performance records and keep accurate records of the project's implementation process and certify that all information provided, to request reimbursements and report training activity, is accurate and true, including evidence that the business has paid the training expenses in accordance with the terms of the agreement prior to requesting reimbursement of allowable training costs. During the grant and/or the completion of the grant, businesses will be asked to provide the following:

- Employer will collect and supply all trainee documentation (e.g., proof of SSN, proof of citizenship/right to work, and proof of physical address, etc.) to MVWDB (before the start date of the training).
- All training sessions must have signed attendance sheets or digital confirmation of attendance. Trainee participation is required.
- Employee satisfaction surveys
- The business must submit to MVWDB copies of all credentials, certificates of completion, or other documentation of the employee's participation within 60 days of the end of training to be considered eligible for reimbursement.

- R&R Grant projects require monthly communication with a Business Services staff member on the status of the project.
- Upon training completion, each project requires one year of follow-up to track project outcomes (e.g., providing updated trainee wages and promotions).
- Employers submitting an R&R Grant application are agreeing to provide this information.

### ALLOWABILITY OF USE OF R&R FUNDS

With proper documentation allowable costs for R&R Grants include (but are not limited to):

- Training/Course Registration
- Instructors/Trainer Salaries
- Curriculum Development
- Textbooks and Manuals
- Materials and Supplies
- Tuition Expenses
- Off-site Training Space (e.g., classroom rental)

Non-reimbursable costs include (but are not limited to):

- Administrative Costs
- Trainee's Wages
- Purchases of Capital Equipment or Capital Improvement
- Purchases of items or services that will be used primarily outside of the R&R program
- Travel Expenses for Trainers or Trainees
- Assessment, Testing, or Certification Fees
- Advertisement or Recruitment
- Annual Membership for Online Courses

### TRAINING SERVICES

The R&R Grant Program provides flexibility regarding the type(s) of training and the training provider(s). Based on the needs of the company and its overall workforce development needs, the company chooses its training and training provider that provides employees with opportunities to acquire new or improved skills.

Training can include, but is not limited to, industry or employer-specific work skills, basic job skills, technical computer skills, new manufacturing technologies, equipment operation training, changes in production processes, and skills such as leadership, teamwork, communication, conflict resolution, and management skills if the employer can document the

need and effect on employee production and/or retention with the company.

Employers will determine and select the types of training and training provider(s) that meet their business and training requirements before submitting a grant application for consideration.

All proposals must show an end date that completes training within 12 months of the award date. All training should have specific start and end dates.

### **INELIGIBLE TRAINING**

- New hire orientation
- Degree programs
- Training that takes place where food and/or beverages are included in the cost
- Training that includes the purchase of equipment (such as iPads or other equipment/ supplies/devices that can be used outside of training) in the cost of the training
- Self-paced learning
- Non skill related assessments
- Mandated safety training (such as OSHA)
- Regularly provided annual training
- English as a second language
- Basic skills or remedial education
- Non-job-related training

### ELIGIBLE TRAINING PROVIDERS AND ACTIVITIES

Public or private educational institutions, trade associations, community-based organizations, economic development agencies, unions, government agencies, or subject matter experts may provide R&R, and training can be conducted at the business facility, at the training provider's facility, online, or a combination of sites.

### **MVWDB CRITERIA**

The MVWDB reserves the right to accept or reject any or all grant applications submitted.

MVWDB does not commit to pay for any cost incurred before any award notification or the execution of any contract. All grant applications and their accompanying attachments will become the property of the MVWDB after submission, and materials will not be returned. Costs incurred by a contracted entity in the delivery of services shall be reimbursed based on mutually agreed-upon conditions and delivery schedules with the submission of appropriate documentation.

### **GRANT PROGRAM PROCEDURES**

### **APPLICATION PROCESS**

Eligible businesses can apply during the time periods listed above until funds are fully expended. The R&R Program Grant Application must be downloaded, completed, and emailed to the MVWDB. The application is the only document that may be used to apply for the R&R Grant. Applications should be submitted at least 30 business days before the start date of the training. However, submittal within this timeframe does not guarantee that the approval date will be on or before the training start date.

### APPLICATION RECEIPT

The business will receive a notification email that the application has been submitted within 48 hours. If the business does not receive this, the application was not received. A holiday or a large influx of applications may cause a delay in the sending of this email. Incomplete applications will delay the approval process, and the application will return to the queue.

#### REVIEW AND APPROVAL

Upon receipt of a completed R&R Grant Application, the grant application will be reviewed to determine the employer's eligibility for R&R funding by board staff. More information may be requested from the employer to determine eligibility. The business committee will review all applications and make award decisions.

### **GRANT CONTRACT**

Within two weeks of the grant approval, the contract between MVWDB and the business will be prepared and sent electronically through DocuSign for signature. Once received, MVWDB will execute the contract through DocuSign. The fully executed contract will then be emailed to the company. This contract must be executed prior to the start date of the R&R. Funding cannot be provided for any costs for an R&R program that starts before the contract for delivery of training has been completed. After the contract is fully executed, all required forms will be provided to the employer. These forms will include:

- Trainee Data Submission Form
- Reimbursement Request Form
- Trainee Roster
- Training Expense Summary Report
- Final Training Evaluation Form

### REIMBURSEMENTS

The first reimbursement can be requested once the contract has been executed by MVWDB. Businesses may request reimbursement as frequently as needed during the 12-month period. Reimbursements will be made in direct correlation with the business's training progress. The percentage of funds reimbursed must stay equal to or less than the percentage of trainees that have been trained to date. All reimbursements must be submitted within 60 days of the contract end date. Reimbursement requests received after the 60-day cutoff will not be processed. Before an invoice can be paid, the Reimbursement Request Form must be completed and submitted to

the MVWDB. Before the final payment can be processed the Final Training Evaluation form must be completed.

### **CONTRACT TERMS**

The contract will set forth all processes and expectations for administering, implementing, and completing the training. If the contract is not executed within a 45- day time frame, the grant award becomes null and void unless permission is granted by the MVWDB. In the contract the employer will agree to and assure the following:

- The business will disclose whether they are currently receiving training funds, either directly or indirectly, from Iowa state government. (If an employer is receiving training funds from Iowa state government, they are not eligible to receive R&R funds as it would be a duplication of funding).
- Employer will assure they are not presently debarred, suspended, proposed for disbarment, and declared ineligible, or voluntarily excluded from participation in transactions by USDOL or the State of Iowa.
- Employer will assure they do not have any outstanding tax liability to the State of Iowa and will disclose outstanding tax liabilities with any other state(s).
- Employer will assure they will not make offers of gratuities or favors to any officer, employee, or board member, or to any subcontractor staff of the MVWDB.
- Employer will assure they have not relocated from any location in the U.S. until the date that is 120 days after the date on which business commences operations at a new location if the relocation of such business or part of a business results in a loss of employment for any employee of such business at the original location and such original location is within the United States.
- Employer will assure that all records relating to activities covered under the R&R (Incumbent Worker Training Program will be available and accessible, upon request, during normal business hours and as often as deemed necessary by state and federal duly authorized representative(s), for the purposes to include monitoring, reviewing, verification, audit, and/or investigation. This shall include authorization to make excerpts or transcripts from all applicable records.
- The employer will agree to monitoring by the MVWDB, Iowa
  Workforce Development, U.S. Department of Labor, or other such
  related agencies of training records to ensure compliance with rules and
  regulations.
- The Employer must agree to not discriminate against any participant because of age, race, creed, color, religion, political belief or affiliation, sex, national origin, ancestry, or disability.
- The Employer must agree to comply with the Americans with Disabilities Act of 1991, Public Law 101-336, or as amended and associated code of federal regulations published in the Federal Register as applicable to the Employer directly or indirectly as recipients of contracted funds for the State of Iowa.

• The employer will assure that all employees will receive a copy of the completion record for the training that each employee successfully completed.

### **LENGTH OF CONTRACT**

Training must be completed within 12 months from the date of approval. From there, the company will have 60 days to submit final reimbursement requests for training completed during the contract period.

### **EXTENSIONS**

There is no provision in the contract for extensions. A business is expected to have carefully assessed its training needs so that it will apply only for the funds needed for training that can be completed in a 12-month timeframe.

#### AMENDMENTS

If there is an extenuating circumstance that leads to a need to request a change to the approved training, the business must contact the MVWDB to discuss the best alternatives. Changes in the training(s) may not necessitate a new application, but the business will need to complete an amended training form and submit it to the MVWDB as soon as possible. If necessary, the MVWDB may convene the grant review committee to review these changes as it relates to the purpose of this grant. The training will still need to be completed within the one-year time frame.

### TECHNICAL ASSISTANCE

The MVWDB staff is available to provide technical assistance throughout the process, from the application stage through contract execution, contract management, and fiscal closeout. An individual or organization may assist a business or group of businesses in the application process; however, that individual/organization may not be compensated with grant funds.

### OTHER TRAINING RESOURCES

There are additional training programs at the local and state level designed to support Iowa businesses by providing training grants. A business can also apply for a State of Iowa grant through Future Ready Iowa's Employer Innovation Fund

The Iowa New Jobs Training Program (260E) was developed to assist businesses that are creating new positions or new jobs. If the company is expanding operations or relocating to a new facility in the state, the 260E program can provide flexible funding to meet a wide variety of training and employee development needs.

The Iowa Jobs Training Program (260F) provides job training services to current employees of eligible businesses.

- Helps companies train current employees with new skills.
- Eligible businesses collaborate with the local community college, which will assess training needs, determine funds available and provide training.
- Valuable employee training for little to no cost

Other local options for funding include customized training which is designed to meet the specific requirements of an employer or group of employers, with the commitment that the employer(s) will retain current employees or hire individuals who successfully complete the

training or an On-the-Job Training grant (On-the-Job Training is training conducted by an employer that is provided to a paid participant while engaged in productive work in a job that provides knowledge or skills essential to the full and adequate performance of the job) through the MVWDB. Contact MVWDB for more information about customized and On-the-Job Training options.

Equal Opportunity Programs/Employer

Auxiliary aids and services are available upon request for individuals with disabilities.

# Sub-recipient Update

### LOCAL GRANT RECIPIENT IDENTIFICATION

### CEOS MUST DESIGNATE AN ALTERNATE ENTITY TO SERVE AS THE LOCAL GRANT RECIPIENT BY FEBRUARY 28, 2023

- 1. The local grant recipient assists in carrying out many key functions of the CEOs.
- 2. A subrecipient provides a structure to support human resources, information technology, grant management, fiscal and accounting operations, and a host of other functions. The local board, in turn, receives the benefit of an *organization* supporting its efforts, as opposed to a single person or a portion of one person's time. Furthermore, it should be noted that in other states, staff to the board is very rarely limited to one person. It is common to see local grant recipients employ multiple individuals to fully support the work of the local board.
- 3. The entity serving as the local grant recipient has several duties, both programmatic and fiscal in nature that are carried out by board staff and fiscal agents. They include the following:
  - **Fulfilling fiscal responsibilities**, either directly or through a contracted fiscal agent. These responsibilities include:

Receiving the WIOA funds, tracking expenditures, preparing financial reports for the local board and IWD, and ensuring compliance with all applicable laws, regulations, and policies

Executing contracts

Monitoring service providers and one-stop operators

■ **Carrying out program responsibilities.** The categories below align with the responsibility of CEOs and the below explains how the local grant recipients carry out those responsibilities:

### Determine eligibility of program participants

- Procure service providers
- Set internal policies and procedures to support
- Monitor providers for complianceBe monitored for compliance

#### **Performance measures**

- Determine who to enroll and when services are complete
- Negotiate performance measures (staff on behalf of the board and CLEO)
- Hold subrecipients to performance measures

### Programmatic decision-making

- Carry out vision of the local board
- Determine businesses who are eligible for training assistance
- Design and deliver programs and services

### Adherence to program requirements

Maintain compliance with law, regulations, and policies including polices set by IWD as well as policies set by the local board

#### Carries out own program

- Contract with entities to deliver direct services
- Design and deliver programs and services

### **Indirect Rate**

The local grant recipient may charge an indirect rate to the WIOA grants for purposes of covering expenses that cannot be directly charged (HR, IT, legal support, procurement support etc). If the local grant recipient does not have a NICRA then the de minimis rate of ten percent is used. These funds are utilized by the organization to carry out its responsibilities as the local grant recipient.

Designating an alternate entity to serve as the local grant recipient would provide them access to a minimum indirect rate of 10% of our overall funding which based on PY22 funding levels would have been \$320,000.

### **Options**

- 1. The CLEO's unit of government is the local grant recipient (this is the default)
- 2. The CLEO may designate an alternate entity to serve as a local grant recipient
  - THE CLEO can authorize the entity to subcontract fiscal agent and employer of record services.
    - Muscatine County is willing to continue serving as the employer of record.
    - CIJDC is willing to continue as the fiscal agent.

Keep in mind that the designation of an alternate entity to serve as the local grant recipient or the designation of a fiscal agent does not relieve the CEOs of their financial liability for any misuse of grant funds.

\*Hiring Policy



### Mississippi Valley Workforce Development Board

### **Employee Management Policy**

### **PURPOSE**

This policy will establish the authorized individuals and policy for the Mississippi Valley Workforce Development Board (MVWDB) as it relates to employee management requirements that the board must take in order to hire, replace, or terminate a director or additional staff.

### BACKGROUND

WIOA sec. 107(f) grants LWDBs authority to hire a director and other staff to assist in carrying out the functions of the LWDB. LWDBs must establish and apply a set of qualifications for the position of director that ensures the individual selected has the requisite knowledge, skills, and abilities to meet identified benchmarks and to assist in carrying out the functions of the LWDB. The LWDB director and staff must be subject to the limitations on the payment of salary and bonuses described in WIOA sec. 194(15).

### **GENERAL INFORMATION**

Muscatine County serves as the employer of record for all board staff and the Muscatine County Employee Handbook will be followed. In circumstances where the Employee Handbook conflicts with this policy, this policy will prevail.

The MVWDB, under the leadership of the MVWDB Chairperson, has the responsibility to maintain oversight over the Executive Director. The oversight duties include the hiring, termination, and resignation of the Executive Director along with the review of their ability to carry out assigned responsibilities. These duties are the sole responsibility of the MVWDB.

### HIRING AUTHORITY

Responsibilities for Hiring or Replacing an Executive Director

- The MVWDB must use a Standing Committee to conduct the hiring process.
- The MVWDB is responsible for providing an approved job description that will be utilized to hire an individual to serve as the Executive Director of the MVWDB. The MVWDB executive committee must perform a quorum vote on the job description for the Executive Director position.
- Once candidates for the Executive Director position have been interviewed, the MVWDB executive committee must perform a quorum vote on which candidate will be selected to serve as the Executive Director.

Responsibilities for Terminating or the Resignation of an Executive Director

- When an Executive Director who is serving the LWDB is terminated or submits their resignation, a notification of this decision must be submitted, in writing by the MVWDB Chairperson, to the full board, CEOs, and Iowa Workforce Development within 48 hours of the termination or resignation notice.
- When the Executive Director position has been vacated, the identification and selection of an interim Executive Director must be made until the MVWDB can perform the hiring process for a new Executive Director. If the MVWDB chooses not to name an interim Executive Director, then the MVWDB assumes the responsibility to execute the duties established in Section I until an Executive Director is hired.

Responsibilities for Hiring Staff other than a Director

- The MVWDB is allowed to hire staff, other than a Director, whose duties are tied to one or more of the MVWDB's responsibilities
- All new positions and job descriptions must be approved by the executive committee
- Existing job descriptions when vacant can be reviewed and updated by the Executive Director.
- The process and approval for hiring additional board staff is fulfilled by the Executive Director

### **APPLICATION PROCEDURES**

- Review and update job description when a vacancy exists
- Advertise vacancies to include job description of the position, filing deadline, and EOE statement in online employment websites (when applicable).
- Develop interview format and questions
- Determine appropriate pre-testing requirements and minimum scores
- Arrange/ conduct interviews with selected applicants
- Multiple MVWDB employees screen and rank applications
- Perform reference check on top candidate(s)
- Executive Director makes hiring decisions
- Notify selected applicant of contingency hiring status
- Notify all applicants of their application status
- Complete employee orientation

### **ANNUAL EVALUATIONS**

The MVWDB board chair shall perform an annual evaluation of the Executive Directors performance with input from committee chairs. The board chair shall thoroughly review performance and make

salary recommendations to the Executive Committee. All annual salary increases will be approved by the Executive Committee prior to the start of each program year.

The Executive Director shall perform staff evaluations annually. The Executive Director shall thoroughly review performance and make salary recommendations to the MVWDB chair. All annual salary increases will be approved by the Executive Committee prior to the start of each program year.

### RATE OF PAY

The minimum rate of pay for a position shall be paid upon appointment to the position and shall remain the rate of pay during the original new hire probationary period. An appointment may be made at a rate above the minimum rate if the appointing authority feels it necessary to secure an outstanding candidate whose past record, experience, and earnings indicate the necessity to pay above the minimum rate and whose employment is deemed highly desirable for the good of the MVWDB. If a former employee is re-employed in a position in which he/she was previously employed, the appointing authority may make an appointment at the same rate of pay, which the employee had been receiving at the termination of their service.

### SALARY ADVANCEMENTS

Salary advancements may be given to an employee after they have completed their probationary period by the Executive Director if within the salary range set by the executive committee. All other increases in salary shall not be made more often than once every six months, Exceptions to this requirement are recommended by the Executive Director to the board chair as the result of exceptional performance, but such exceptional increases will normally involve a promotion and/or the assignment of additional duties which are more difficult or when requirements have been made above those normally assigned to that position. Salary changes shall be reviewed and approved by the Executive Committee. The salary of each position shall be related to the responsibilities and scope of duties of the position. The salary scale shall be established with reference to prevailing practice for comparable positions in public or private agencies. It is intended that each employee will be compensated on an equitable and consistent basis and that all employees holding similar positions will be similarly treated and compensated. The Board will approve the salary scale and job description for each position.

### SEPARATIONS AND DISCRETIONARY ACTION

The board chair will recommend any suspension, demotion, or termination of the Executive Director to the Executive Committee. The Executive Committee will then make a recommendation to MVWDB and CEOs who will make the final determination. All personnel actions will be taken in closed sessions.

The Executive Director has the authority to suspend, demote, or terminate staff in accordance with Muscatine County procedures.

\*Support Services Policy Modification



### Mississippi Valley Workforce Development Board

### **Support Services Policy**

Approved Date: August 23, 2021 Effective Date: August 23, 2021 Amended Date: September 13, 2022

### A. Purpose

To provide MVWA contractors of WIOA, Adult, Dislocated Worker and Youth with guidelines and restrictions on supportive services.

#### B. Background

- 1. Support services are available to WIOA Adult, Dislocated Workers, and Youth who meet WIOA eligibility requirements as described below.
- 2. As WIOA programs are not an entitlement, supportive service payments are made on a case by-case basis only when determined necessary and allowable.
- 3. Due to funding limitations, WIOA supportive services are always the last resort.
- All other sources of funding must be sought first and documented to avoid duplication of services.
- 5. All attempts to find other supportive service funding and the reasons for needing WIOA funding must be documented in the state case management system.
- 6. Potential sources for other funding may include state-funded sources, Pell Grants, or Trade Adjustment Assistance (TAA).

### C. Eligibility

- Supportive services, including needs-related payments, may only be provided to participants who:
  - a. Are participating in Career services or Training services approved by WIOA Title I.
  - b. Are unable to obtain supportive services via their support network or through other programs including community agencies that provide these services; and
  - c. Require those services to enable him/her to participate in WIOA Title I activities.
- 2. A review of the Adult, Dislocated Worker participant's budget shall be completed to determine need. Details of the budget will be provided into the state case management system. In all cases, staff must review service notes prior to making any supportive service payments to avoid duplicate payments from multiple sources and to ensure the participant has not exceeded any limits set forth in this policy.
- 3. The supportive service(s) must be necessary for the customer to achieve the goals outlined in their Employment Plan (EP).
- 4. The Comprehensive and Affiliate Job Centers must keep an up-to-date listing of available community resources (paper and/or electronic) and make available to participants prior to any

WIOA payment for supportive services. Providing information about the availability of, and referrals to, alternate supportive services sources is required by 20 CRF 678.430 (a) (9).

### **Support Payments**

#### A. Overview

- 1. The MVWA has a per participant support cap maximum of \$6,000.00 per program year.
- 2. The board has a 60-daylimit for supportive services after a customer completes training or is no longer participating inan approved WIOA activity, excluding Youth participants.
- 3. Youth participants are provided support services through follow-up.
- 4. Following are the allowable types of Support Service Payments and a description of each. Payments may be made directly to vendors on behalf of a participant, or as a reimbursement to the individual unless otherwise noted below.

### B. Clothing (CHG)

- 1. Payments for items such as clothes and shoes (uniforms, safety equipment, etc.) that are necessary for participation in WIOA Title 1 activities, including interviewing, employment or work experience are allowable.
- 2. Itemized invoice or receipt is required.
- 3. Maximum expenditure is \$300.00 per activity.
- 4. This support service should be classified as CHG in the IowaWORKS system.

### C. Dependent Care (DPC)

- 1. The costs of dependent care from licensed daycare providers or from private sources agreed upon by the participant are an allowable expense.
- 2. Dependent care assistance may be provided to eligible participants who require such assistance in order to participate in a WIOA activity and whose need has been linked to an activity.
- 3. Dependent care includes child or adult care for which the participant would normally be responsible.
- 4. If an unemployed parent of the child resides in the home, no childcare support will be provided.
- 5. DPC payments are paid directly to the participant after verification by the case manager.
- 6. The case manager will verify:
  - a. the childcare provider form identifying the person(s) for whom they are providing care,
  - b. the provider is not being paid by other sources (or verification of participant co-pay),
  - documentation of the days/hours the care is provided, and the attendance/progress form from the training provider verifying that the childcare is necessary.
- 7. Dependent care support should only be used when the participant is not eligible for, or is pending approval of, childcare assistance through DHS/Promise Jobs.
- 8. Maximum of \$50 per day for one dependent.
- 9. Maximum of \$100 per day for two or more dependents.
- 10. Maximum of \$500 per week for two or more dependents.
- 11. This support service should be classified as DPC in the Iowa WORKS system.

MVWA Support Services Policy

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#### D. Educational Assistance (EST)

- 1. Assistance with books, fees, school supplies, laptops, internet access, and other necessary services/items for students enrolled in high school, alternative high school, high school equivalent, or post-secondary education classes are allowable.
- 2. This includes background checks, physicals, and screenings that are necessary for acceptance or participation in educational classes.
- 3. In the event a program participant has been awarded a Pell Grant, the Pell Grant must be applied against the cost of allowable educational expenses before WIOA funds are utilized.
- 4. Participants that need laptops, internet service, and other supportive services must provide written documentation from the training site indicating the need for these services.
- The laptop may be retained by the participant after the completion of training and will only be provided one time per program year.
- 6. Services for internet are limited to the time that the individual is in a training activity.
- 7. Itemized invoice/receipt, or syllabus is required. Documentation from the instructor is required from training site for laptop and/or internet access.
- 8. This support service should be classified as EST in the IowaWORKS system.

### E. Educational Testing (EDT)

- 1. Assistance with educational testing required for participation in WIOA Title 1 activities is allowable.
- 2. Some examples of educational testing include, but are not limited to, high school equivalency testing and vocational testing.
- 3. If required for employment, the costs for licenses and application fees are allowable, examples include nursing boards.
- 4. Itemized invoice or receipt is required.
- 5. This support service should be classified as EDT in the Iowa WORKS system.

#### F. Health Care (HLC)

- 1. Health care assistance can be made available to participants when lack of assistance will affect their ability to obtain or maintain employment, or if it is a requirement of an educational program.
- 2. Allowable expenses include but are not limited to:
  - a. physical exams,
  - b. drug tests, and
  - c. co- pays for prescription drugs.
- 3. This supportive service should be used only when there are no other resources available to the participant.
- 4. Itemized invoice or receipt is required.
- 5. Maximum expenditure is \$300.00 per program year.
- 6. This support service should be classified as HLC in the Iowa WORKS system.

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### G. Services for Individuals with Disabilities (SID)

- 1. The costs of special services, supplies, equipment, and tools necessary to enable a participant with a disability to participate in an education or employment related activity are allowable.
- 2. It is not an allowable use of WIOA Title 1 funds to make capital improvements to a training or work site for general compliance with the Americans with Disabilities Act requirements.
- 3. Itemized invoice or receipt is required.
- 4. This support service should be classified as SID in the Iowa WORKS system.

### H. Transportation (TRN)

- 1. The cost of transportation necessary to participate in WIOA Title 1 activities and services, including job searching and job interviews, is allowable.
- 2. Assistance can consist of:
  - a. Per mile reimbursement,
  - b. fuel purchase orders,
  - c. ride share services, like Uber and Lyft for example,
  - d. bus and/or taxi passes.
  - e. Bicycle and safety equipment purchases capped at \$500
- 3. Bus passes must not be provided for more than 30 days in advance, 1-day bus passes are also allowable.

### 4. Mileage will be reimbursed at the federal IRS rate.

- 5. Mileage expenses must be supported with a map from a web mapping service.
- 6. Itemized receipts/invoices are required for other transportation.
- 7. This support service should be classified as TRN in the Iowa WORKS system.

### I. Housing/Rent/Utilities

- 1. The participant must indicate a need and sign an applicant statement requesting the assistance.
- 2. Deposits are not allowable since the amount may be reimbursed to a participant at a later date.
- 3. Payment of late fees or interest fees or charges associated with payments not made on time are not allowable.
- 4. Required documentation for payment includes a copy of a signed lease with the participant's signature and monthly amount due or proof of a mortgage in the participant's name.
- 5. If the lease is not in the participant's name, an applicant statement must be made explaining the relationship between the participant and person named in the lease.
- 6. Payments will be based on actual rent expense minus any subsidies.
- 7. Rent or mortgage assistance is limited to one time per household per program year.
  - a. Maximum for rent \$850, maximum for mortgage \$1,000.
- 8. Utilities are allowed up to \$500 per program year and must be supported by actual bills.

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**Commented [MS1]:** Proposed to change to 65% of the federal per diem rate.

### 9. This support service should be classified as FAS in the Iowa WORKS system.

### J. Car Repairs/Insurance

- 1. Vehicle repair costs may be provided but must be directly linked to an allowable activity.
- 2. Required documentation includes:
  - a. copy of title or registration showing the client or their spouse, parent/guardian legally owns the vehicle
  - b. proof of car insurance.
- 3. No cosmetic repairs will be paid using WIOA funds.
- 4. Vehicle insurance premiums for up to 6 months are also an allowable expense and is a one-time only payment. Two quotes for repairs are required unless the vehicle has to be towed.
- 5. The participant cannot receive mileage reimbursement and vehicle repairs during the same week. If vehicle repairs are paid, no transportation will be paid.
- 6. Maximum per participant is \$1,000 per program year.
- 7. This support service should be classified as FAS in the IowaWORKS system.

### K. Tools or Equipment

- 1. The participant must submit proof that the employer or training provider requires the participant to have specific tools or equipment to perform job duties or complete training.
- The participant must submit documentation from the employer or training institute that the items are required.
- 3. This support service should be classified as MSS in the Iowa WORKS system.

### L. Employment Related Expenses

- Employment related expenses include various fees not covered in other categories that are related to education and/or employment, including licensing, bonding, background checks for work-based learning, and application fees.
- 2. The cost of required identification documents for education or employment is allowed.
- 3. The cost of a laptop for a participant doing a remote work-based learning activity is allowed.
- 4. The maximum amount per participant is \$500 per program year.
- 5. This support service should be classified as MSS in the Iowa WORKS system.

### M. Supported Employment and Training (SET)

- Supported Employment and Training payments are allowable to provide individuals requiring individualized assistance with the one-to-one instruction and with the support necessary to enable them to complete occupational skill training and/or obtain and retain competitive employment.
- 2. SET may only be used in training situations that are designed to prepare the participant for continuing non-supported competitive employment. An example of SET use in conjunction with an occupational skills training would be hiring a tutor to assist with classes.
- 3. SET may be conducted in conjunction with experiential learning activities. An example of SET

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- use in this situation would be the hiring of a job coach to assist an individual who has been placed in competitive employment.
- 4. The length of a Supported Employment and Training contract may not exceed six months per enrollment.
- 5. The service provider must have an established rate for the service and charges must be in the same manner and at the same rate as other entities purchasing similar services.
- 6. Itemized invoice or receipt is required.
- 7. This support service should be classified as SET in the Iowa WORKS system.

### **Needs Related Payments**

### A. Overview

- 1. Needs Related Payments (NRP) are cash payments to WIOA participants for general living expenses to enable them to continue and succeed in the WIOA Program.
- 2. Needs-related supportive services must be approved by the WIOA Project Director and paid directly to the participant.
- 3. The maximum for a Need Related Payment per participant is \$500 per program year.
- 4. NPR's are one of the supportive services authorized by WIOA.
- 5. Unlike other supportive services, in order to qualify for needs-related payments a participant must be enrolled in training.
- 6. NRPs are available for the following fund sources:
  - a. Adult,
  - b. Dislocated Worker,
  - c. Out-of-School Youth, and
  - d. In-School Youth.

### **B.** Adult Eligibility

- 1. Participants enrolled in the Adult program must meet the following criteria to receive needs-related payments:
  - a. Be unemployed,
  - b. Not qualify for, or have ceased qualifying for, unemployment compensation,
  - c. Be enrolled (applied and accepted) in training services under WIOA Title I that has already begun or will begin within 30 calendar days.

### C. Dislocated Worker Eligibility

1. Participants enrolled in the Dislocated Worker program must meet the following criteria to receive needs-related payments:

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- a. Be unemployed, and
- b. Have ceased to qualify for unemployment compensation or Trade Readjustment Allowance, and
- c. Be enrolled in a program of training services under WIOA Title I by the end of the 13th week after the most recent layoff that resulted in a determination of the worker's eligibility as a dislocated worker, or, if later, by the end of the 8th week after the worker is informed that a short-term layoff will exceed 6 months; or
- d. Be unemployed and not qualify for unemployment compensation or Trade Readjustment Allowance (TRA) under TAA and be enrolled (applied and accepted) in training services under WIOA Title I that has already begun or will begin within 30 calendar days.
- 2. For dislocated workers, payments must not exceed the greater of either of the following levels:
  - a. The applicable weekly level of the unemployment compensation benefit, for participants
    who were eligible for unemployment compensation as a result of the qualifying dislocation;
    or
  - b. The poverty level for an equivalent period, for participants who did not qualify for unemployment compensation as a result of the qualifying layoff.
  - The weekly payment level must be adjusted to reflect changes in total family income, as determined by Local WDB policies.
  - d. At least quarterly, the amount of family income must be reviewed to determine if adjustments must be made in the amount of NRP payments.

#### D. Youth Eligibility

- 1. Participants enrolled in the Youth program must meet the following criteria to receive needs-related payments:
  - a. Be unemployed
  - b. Not qualify for or have ceased qualifying for unemployment compensation.

#### E. Approval of Support Payments

- 1. A WIOA Project Director and/or Operations Supervisor in each center will be responsible for reviewing and approving support payment request for WIOA Adults, Dislocated Workers, and Youth to ensure all WIOA requirements have been met, and the request is appropriate and to ensure sufficient funds are available.
- 2. In the event that any supportive service not previously outlined in this policy is requested or requires more than the allowable maximum amount or cap, as stated in policy a waiver may be submitted to the board Executive Director. In consultation with the appropriate committee chairs and authorization to exceed the maximum will be awarded on a case-by-case basis. Proper justification must be outlined on the waiver. Written justification from the customer is required prior to making the payment.

Equal Opportunity Programs/Employer – Auxiliary aids and services available upon request for individuals with disabilities

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# \*OSO KPI REPORT

# IWD Monitoring

### **Summary of IWD Monitoring Report**

A full 14-page IWD monitoring report can be shared upon request. IWD PY22 monitoring is closed, and all corrective action plans have been accepted by IWD.

### **FINDINGS**

### Finding #1

During the review of participant files, it was discovered that the Objective Assessment Summary (OBA) and Individual Service Strategy (ISS) were not completed within 30 days of eligibility determination. For program participation, youth must have a completed OBA, ISS, and one of the fourteen youth elements. In addition, the completion of the OBA is important to assess the service needs of the participant, while the creation of the ISS outlines the appropriate service goals and objectives.

### Corrective Action Plan

The service provider updated the case management enrollment checklist so that the OBA and ISS are completed within 30 days of enrollment. All new enrollments are reviewed by Operations Supervisors within 20 days of enrollment to ensure this process is completed. Career Navigators trained in this process on 1/24/23.

### Finding #2

During the review of participant files, it was discovered that youth goals were not documented as being achieved by their estimated date of completion. While progress reviews were documented, they did not include a review of the specific Individual Service Strategy (ISS) goals, nor were the goals updated to reflect the completion of the goal. This is important, as the ISS serves as the main mechanism for evaluating and tracking participant progress in relation to their goals.

### Corrective Action Plan

Staff completed training on the career pathway goal development, keeping goals specific, realistic length, aligning goals with OAS and ISS case notes; benchmark goals opening for less than 1 year, best practices for review dates on goals, and goal reporting; and closing goals and objectives; documenting progress towards goals at the time of review, potential extensions needed, and organizational methods. Operations Supervisors also met individually with Career Navigators to set up IowaWORKS alerts. We request the IowaWORKS youth goals report, in case management program specific, to be researched for usage as this report does not seem to be functioning as of this request.

### Finding #3

During the review of participant files, it was discovered that training services were provided in a manner that did not maximize informed consumer choice in selecting an eligible training provider. Informed choice plays a significant role in career planning and ensuring the participant explores all available providers and programs to attend the program that best suits their career objectives.

#### Corrective Action Plan

The training was held on 1/24/23 regarding the thorough completion of the consumer choice worksheet, ensuring the participant is the one completing it and the accurate review of the ETPL with During the training, the consumer choice worksheet was shown, an example of a completed worksheet with multiple ETPL choices was given and an example of a worksheet with only one certificate from the ETPL was shown. Each situation was demonstrated on how to complete and the importance of completing the LMI data, walking through the tool to completion with participants to demonstrate consumer choice and guidance on their career pathway.

### Finding #4

During the review of participant files, there were several observed instances where services were not being accurately delivered or documented according to state and local policy. For effective service delivery, accurate documentation, and sound performance and reporting, it is important service delivery aligns with policies.

### Corrective Action Plan

State IDs: 2202685831; 2202878698; & 2202878698 were all confirmed to have correct support services paid case notes. The rest of the cases reviewed have been corrected in case notes. The service provider trained staff on 1/11/23 on entering case notes for paid support services and utilization of case note templates.

Regarding condition #2, the state's response to questions indicates that local policy applies to the condition. The board will update the current local support services policy to clearly identify to staff which local support service payment ties to each option in the Iowa WORKS system. Once the policy has been updated appropriate training will be provided to staff.

Regarding condition #3; training was held regarding PVA and OST on 1/24/23 for Career Navigators, those in attendance were Kendra Schaapveld, Logan Akers, Sumita Amrik, Cynthia Anderson, Alicia Domino Keenan, Makenzie Failyer, Leah Haberichter, Robert Hummel, Jamie McLaughlin, Deborah Leatherman, Megan Race, Jennifer Schuster, Brent Schwoebel, Tabytha Seigfried, Cheryl Tipsword, Dashawn Banks, Shannon Weaver, Tyler Weger, and Autumn Fjeld. Taylor Longstreth and Tabytha Seigfried were trained on 1/23/23.

### Finding #5

During the review of participant files, it was discovered that the grant outcome was not entered for a participant. The grant outcome is required for reporting purposes specifically related to National Dislocated Worker Grants (NDWG). This is important to ensure accurate performance and reporting.

### Corrective Action Plan

Quality Assurance staff completed a review to ensure compliance with the grant outcome was completed on all NDWG files. The training was held on 1/24/23 regarding the NDWG grant outcome ribbon. Quality Assurance staff emailed the desk aid directions to staff and presented the steps in a live demonstration.

### Finding #6

During the onsite review, it was observed that specific equal opportunity and nondiscrimination guidelines were not followed. No quarterly complaint logs have been received to date. This was an area of concern during PY21 monitoring.

### Corrective Action Plan

Condition #2: Brochures and pamphlets do not include the required tagline or Relay This condition was removed by IWD as it was not Title I materials lacking this required information.

An SOP has been written for this process and quarterly the Title III Operations Manager will email the logs to the state EOO and copy the local EOO into this communication. The local EOO will file the confirmation of the submission of these logs for documentation purposes.

If the LWDB is going to receive findings for actions taken or not taken by Title III all communication regarding Equal Opportunity policies and procedures should be sent directly to the local EOO and not to the Title III Operations Managers. It is the responsibility of the EOO to keep the relevant parties informed of changes and requirements regarding Equal Opportunity.

### AREAS OF CONCERN

### Areas of Concern #1

The results of basic skills assessments completed as part of the Objective Assessment Summary were not documented within the Assessments Tab of some of the participant files. Though they were documented in either case notes or the Testing Results Comments section of the Objective Assessment Summary, IWD would like to see the results documented within the Assessments Tab. This will allow for consistency, accurate IowaWORKS reporting, and the ability to better track participant improvements in basic skills development.

### Area of Concern #2

State ID: 2203018456 – It was case noted on 7/25/2022 that the participant unsuccessfully completed the summer semester at Southeastern Community College. There was no documentation surrounding the reasons for the unsuccessful completion and no documentation that additional services were offered or provided to assist the participant to get back on track along her career pathway.

State ID: 2202672638 – It was case noted on 7/14/2022 that the participant contacted the Career Planner and informed them she quit her employment due to unfair treatment and age discrimination. The participant reported she filed for unemployment and would like to begin job searching immediately. There was no documentation of any further discussion and no documentation that services were offered or provided. The participant soft exited on 7/14/2022.

### Area of Concern #3

While reviewing participant files, it was observed that an Occupational Skills Training (OST) service is entered on the Individual Employment Plan (IEP) for every semester the participant is in training. Along with each service, multiple case notes are documenting the justification for the OST and/or that the participant is entering training. IWD advises that only one OST is documented for the entire length of the training. Additionally, continue to complete an Individual Training Account and confirm the provider remains on the Eligible Training Provider List every semester.

Similarly, there are duplicate support services on the IEP that aren't necessary. The transportation (TRN) support service, for example, appears to be entered for every time and attendance sheet received for the OST service. It is advised that one TRN service is entered for the length of the training, or for each semester to coincide with the ITA timeframe, with one justification case note and a case note for every payment made.

Performance

### MS Valley Specific Youth Strategies

- Increased enrollments result in a higher denominator.
- Work-based learning focus
- Youth incentives aligned with common measure performances.
- Cohort approach
- Analysis of successful partnerships and best practices with training providers and educational institutions that result in mutual positive performance
- Real-time tracking of measurable skills gains and credentials through supervisor and quality assurance reviews.
- Utilizing predictive reporting to "scrub" data and identify participants who may have a positive impact on performance prior to end-of-year final performance data
- Use of supplemental verification for employment, including the Work Number