




# NORTHEAST IOWA LOCAL POLICIES

Northeast Iowa Workforce Development Board  
Local Policies – Updated 12/12/2025

Equal Opportunity Program/Employer

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



## TABLE OF CONTENTS

<b>ADMINISTRATION AND GOVERNANCE .....</b>	<b>6</b>
<i>ACCOUNTING AND FINANCE POLICIES AND PROCEDURES .....</i>	<i>6</i>
<i>BUY AMERICAN PROVISION .....</i>	<i>9</i>
<i>CERTIFICATION REGARDING LOBBYING.....</i>	<i>9</i>
<i>CONFIDENTIALITY.....</i>	<i>9</i>
<i>CONFLICT OF INTEREST .....</i>	<i>9</i>
<i>CORRECTIVE ACTION.....</i>	<i>13</i>
SECTION I: WIOA TITLE I SERVICE PROVIDER COMPLIANCE .....	15
A. PERFORMANCE VIOLATIONS .....	15
B. FISCAL COMPLIANCE VIOLATIONS .....	15
C. PERFORMANCE MONITORING .....	16
D. PERFORMANCE MEASURES .....	16
E. CORRECTIVE ACTION PROCESS .....	16
F. MONITORING AND DOCUMENTATION .....	18
G. APPEALS PROCESS .....	18
H. DEFINITIONS:.....	18
SECTION II: EQUAL OPPORTUNITY (EO) COMPLIANCE .....	19
A. EQUAL OPPORTUNITY MONITORING .....	20
B. TECHNICAL VIOLATIONS (EO-SPECIFIC) .....	20
C. DISCRIMINATION VIOLATIONS AND PROCEDURES .....	20
D. CORRECTIVE ACTION PROCESS .....	21
E. EO TIMEFRAMES AND RESPONSIBILITIES .....	23
F. ROLES AND RESPONSIBILITIES.....	23
<i>CREDIT CARD .....</i>	<i>24</i>
<i>DEBARMENT AND SUSPENSION .....</i>	<i>24</i>
<i>DISAGREEMENTS AND DISPUTE RESOLUTION.....</i>	<i>24</i>
<i>DRUG AND ALCOHOL-FREE WORKPLACE.....</i>	<i>24</i>
<i>FIREWALLS.....</i>	<i>25</i>
A.    DEFINITIONS .....	25
B.    FIREWALL GUIDELINES.....	25
C.    CONTROL ACTIVITIES – 2 CFR 200.318(C)(1) .....	25
D.    FISCAL AGENT.....	26
E.    EXECUTIVE DIRECTOR .....	26
F.    ONE-STOP OPERATOR.....	26
G.    TITLE I SERVICE PROVIDERS .....	27
h.    BOARDS AND COMMITTEES.....	27
H.    INDIVIDUALS AND ORGANIZATIONS SERVING AS STAFF TO THE BOARD .....	28

<i>GRIEVANCE AND COMPLAINTS PROCEDURES</i> .....	28
COMPLAINTS AND GRIEVANCES .....	29
WORKFORCE INNOVATION & OPPORTUNITY ACT (WIOA) .....	31
<i>INCENTIVE PAYMENT POLICY (BOARD STAFF)</i> .....	32
<i>LANGUAGE ACCESS POLICY (LAP)</i> .....	38
LIMITED ENGLISH PROFICIENCY (LEP) PLAN (ATTACHMENT 1) .....	43
<i>LOCAL MONITORING AND OVERSIGHT</i> .....	55
<i>NON-DISCRIMINATION AND EQUAL OPPORTUNITY</i> .....	59
<i>PERSONALLY IDENTIFIABLE INFORMATION (PII)</i> .....	60
<i>POLICY REVISION PROCESS</i> .....	65
<i>PRIORITY OF SERVICE</i> .....	68
ADULT PRIORITY OF SERVICE .....	68
VETERANS PRIORITY OF SERVICE .....	75
<i>PROCUREMENT POLICIES AND PROCEDURES</i> .....	75
METHODS OF PROCUREMENT .....	78
MICRO-PURCHASES .....	78
SMALL PURCHASES – REQUEST FOR QUOTES .....	79
SEALED BIDS .....	79
COMPETITIVE PROPOSALS – REQUEST FOR PROPOSALS .....	80
NONCOMPETITIVE PROPOSALS – SOLE SOURCE .....	82
REJECTION OF BIDS OR PROPOSALS .....	83
CANCELLATION OF SOLICITATION .....	83
PROCUREMENT RECORDS .....	83
CONTRACT PROVISIONS .....	84
RIGHT TO FILE A GRIEVANCE .....	84
STANDARDS OF CONDUCT .....	85
CONFIDENTIALITY AND NON-DISCLOSURE .....	86
<i>SERVICE PROVIDER TRANSITION</i> .....	86
NOTIFICATION AND PLANNING .....	87
PARTICIPANT COMMUNICATION .....	87
PROCUREMENT .....	87
TRANSITION TIMELINE .....	87
TRANSFER OF PARTICIPANT RECORDS .....	88
MONITORING AND EVALUATION .....	88
INTERIM SERVICE PROVIDER SERVICES .....	89
ROLE OF FISCAL AGENT DURING TRANSITION .....	89
ROLE OF EMPLOYER OF RECORD DURING TRANSITION .....	90
NORTHEAST IOWA SERVICE PROVIDER TRANSITION GUIDANCE .....	90
<i>TICKET TO WORK FUND REQUEST</i> .....	93
CRITERIA FOR EVALUATING TICKET-TO-WORK FUND PROPOSALS .....	95

TRAVEL.....	98
WHISTLEBLOWER .....	103
<b>TITLE IB PROGRAMS.....</b>	<b>104</b>
ADDITIONAL ASSISTANCE .....	104
ADULT MENTORING.....	104
CLOSURE OF SERVICES DUE TO FRAUD .....	104
DISLOCATED WORKER PROGRAM ELIGIBILITY DUE TO ECONOMIC CONDITIONS .....	105
ECONOMIC SELF-SUFFICIENCY .....	105
ELIGIBILITY DETERMINATION – OTHER RESPONSIBLE ADULTS (PROGRAM PARTICIPATION FOR MINORS).....	105
FOLLOW-UP SERVICES.....	106
GEOGRAPHICAL PREFERENCE .....	107
IN – DEMAND OCCUPATIONS DETERMINATION & USAGE.....	108
INDIVIDUAL TRAINING ACCOUNTS (ITA).....	113
INELIGIBILITY.....	115
LAPTOP PURCHASE .....	115
SELF-SUFFICIENCY.....	116
UNDEREMPLOYED INDIVIDUALS .....	116
UNLIKELY TO RETURN ELIGIBILITY .....	116
<b>PARTICIPANT SERVICES .....</b>	<b>119</b>
CASE NOTES.....	119
PARTICIPANT PAYMENTS REQUIRED DOCUMENTATION .....	131
INDIVIDUAL CAREER SERVICES .....	134
OBJECTIVE ASSESSMENT (OBA) .....	135
CONSUMER CHOICE (TRAINING SERVICES) .....	139
CUSTOMIZED TRAINING (CUS) .....	141
ENTREPRENEURIAL TRAINING (ENT).....	141
INCUMBENT WORKER TRAINING (IWT).....	141
INDIVIDUAL CAREER SERVICES (See Objective Assessment and Individual Career Services Policy).....	145
INTERNSHIPS (INT).....	145
JOB SHADOWING (SHW) .....	145
OCCUPATIONAL TRAINING (OST).....	145

ONLINE DISTANCE LEARNING .....	147
<i>ON-THE-JOB (OJT) TRAINING</i> .....	<i>148</i>
OJT WAGES & BENEFITS.....	148
EMPLOYER ELIGIBILITY.....	148
OJT PAYMENT & TRAINING LENGTH.....	150
OJT CONTRACTS .....	150
OTHER ONSITE TRAINING .....	151
<i>PRE-VOCATIONAL ACTIVITIES (PVA)</i> .....	<i>151</i>
<i>QUALITY PRE-APPRENTICESHIP (QPA)</i> .....	<i>152</i>
<i>REGISTERED APPRENTICESHIP (RA)</i> .....	<i>152</i>
<i>SECONDARY EDUCATION CERTIFICATION (SEC)</i> .....	<i>152</i>
<i>WORK EXPERIENCE (WEP)</i> .....	<i>152</i>
<i>SUPPORT SERVICES</i> .....	<i>152</i>
CLOTHING (CHG).....	157
DEPENDENT CARE (DPC).....	157
EDUCATIONAL ASSISTANCE (EST).....	158
EDUCATIONAL TESTING (EDT) .....	158
FINANCIAL ASSISTANCE (FAS) .....	158
HEALTH CARE (HLC) .....	159
MISCELLANEOUS SERVICES (MSS) .....	159
NEEDS RELATED PAYMENTS (NRP) .....	160
SERVICES FOR INDIVIDUALS WITH DISABILITIES (SID) .....	160
SUPPORTED EMPLOYMENT AND TRAINING (SET) .....	160
TRANSPORTATION (TRN) .....	160
YOUTH INCENTIVE PAYMENTS (YIP) AND STIPEND (STI).....	164
<i>APPENDIX</i> .....	<i>173</i>
APPENDIX A: WAIVER REQUEST .....	173

# NORTHEAST IOWA LOCAL POLICIES

## ADMINISTRATION AND GOVERNANCE

### ACCOUNTING AND FINANCE POLICIES AND PROCEDURES

The CLEO will designate a Fiscal Agent pursuant to the Workforce Innovation and Opportunity Act of 2014 (WIOA).

While WIOA permits the CLEO to designate an entity to serve on his/her behalf as fiscal agent, the designation does not relieve the CLEO of financial liability for any misspent funds. Under WIOA, the CLEO retains ultimate liability for the repayment of any WIOA funds which have been misused or costs which have been disallowed.

The purpose of this Policy is to articulate the expectations of the designated Fiscal Agent.

#### 1. DELEGATION OF RESPONSIBILITIES

1. The CLEO and LWDB may delegate to the Fiscal Agent the power and responsibility to enter into contracts, subcontracts, and other agreements subject to CLEO and LWDB approval, to receive, expend, and distribute funds, to develop and evaluate procedures for financial management, and to hire, organize, and train the staff needed to carry out these responsibilities.
2. The Fiscal Agent will accept on behalf of the CLEO all grant funds associated with Title IB of WIOA, as well as other related grants designed to help carry out the purpose of WIOA programs. This responsibility also includes funds available under the Trade Adjustment Act (TAA), if applicable.
3. The Fiscal Agent will disburse WIOA funds for allowable workforce innovation activities on behalf of the CLEO. As required by law, these disbursements will occur at the direction of the LWDB, provided that the purpose for the disbursement is allowable, authorized and documented.
4. The Fiscal Agent's necessary and reasonable administrative costs for performing the duties of fiscal agent will be paid from WIOA funds available for administrative expenses as reflected in an operating budget which the Fiscal Agent shall submit to the CLEO and LWDB annually for approval.
5. No provision for profit is allowed for the Fiscal Agent and any excess of revenue over the costs must be counted as program income and spent in compliance with WIOA program income requirements. Interest earned on funds received under WIOA Title I must also be included in program income.

## 2. GENERAL EXPECTATIONS OF THE FISCAL AGENT FOR ADMINISTRATION

1. The Fiscal Agent will comply with Federal and State law, regulation and policy established for WIOA programs.
2. The Fiscal Agent will comply with relevant circulars of the Office of Management and Budget. These include but are not limited to the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* at 2 CFR, Part 200 and DOL's Exceptions at 2 CFR 2900.
3. The Fiscal Agent will maintain an accounting system that will meet all the fund accounting and reporting requirements for WIOA grant programs.
4. The Fiscal Agent will employ, train, and maintain a sufficient number of qualified staff members necessary to fulfill the duties of fiscal agent, subject to the limitations of an annual budget.
5. The Fiscal Agent will continuously review operational policies and make recommendations to streamline or improve administration of WIOA programs.
6. The Fiscal Agent will manage an appropriate system for the award and administration of grants and contracts, including monitoring of grants and contracts.
7. The Fiscal Agent will enter into written grant agreements or contracts only as needed and when clear goals and obligations are established and at the direction of the LWDB.
8. The Fiscal Agent will monitor the implementation of all grants and contracts and fulfill the requirement on local areas to conduct financial monitoring not less frequently than annually.
9. The Fiscal Agent will take prompt and appropriate corrective action upon becoming aware of any evidence of a violation of Federal or State WIOA rules or policies.
10. The Fiscal Agent will closely monitor the life of all grant funds to ensure they are used to the maximum amount allowed under WIOA and to avoid any loss of funds allocated to the LWDA.

## 3. PROCEDURAL EXPECTATIONS

1. The Fiscal Agent will manage a property control system that meets all Federal and State requirements and provides for a full accounting of all property and equipment purchased with WIOA funds.

#### **4. SERVICE EXPECTATIONS**

1. The decisions made by the Fiscal Agent will be transparent and based on the good of participants and the service delivery system within the local workforce innovation area as a whole.
2. The Fiscal Agent will assure continuity in customer services.

#### **5. REPORTING EXPECTATIONS**

1. The Fiscal Agent shall provide the following information monthly:
  - a. Reports and other documents that summarize the current financial conditions of all WIOA grants awarded to the LWDA, including income, expenditures, fund balances, comparison to approved budget and other financial metrics the CLEO and LWDB may identify in conjunction with the execution of their responsibilities under this Agreement.
  - b. Reports and supporting documents that summarize known compliance issues or concerns along with an explanation of any out-of-compliance notices received for any program for which the CLEO and LWDB retain ultimate responsibility.
2. The Fiscal Agent shall meet with a representative of the local board on a regular basis to review reports and address questions or concerns. These meetings shall be held not less frequently than quarterly.

#### **6. SEPARATION OF DUTIES**

1. The Fiscal Agent will follow all separation of duties and conflict of interest requirements under WIOA.

#### **7. LIABILITY EXPECTATION**

1. The Fiscal Agent will be held accountable for all expenditures or costs that violate WIOA requirements. This includes disallowed costs resulting from Fiscal Agent's failure to apply or properly interpret WIOA requirements, negligence, Fiscal Agent's failure to follow accepted standards of financial management or other failure to safeguard WIOA funds. All agreements or contracts with service providers shall include provisions that require the service provider to be responsible for disallowed costs resulting from the service provider's known failure to apply or properly interpret WIOA requirements, gross negligence, the service provider's failure to follow accepted standards of financial management or other failure to safeguard WIOA funds.
2. In the event costs are disallowed, the CLEO will seek reimbursement from the Fiscal Agent for all disallowed costs and expect the Fiscal Agent to repay these costs with non-Federal sources of funds. The Fiscal Agent may seek reimbursement from the service



provider or other contractors for whom costs were disallowed. The Fiscal Agent shall assure that any such reimbursed costs will be paid from non-Federal sources of funds.

## **8. OTHER EXPECTATIONS OF THE CLEO AND LWDB**

1. The CLEO and LWDB expects to work in partnership with the Fiscal Agent to safeguard WIOA funds and to assure that the funds available in the LWDA are used for the maximum benefit of citizens in the local area.

### **BUY AMERICAN PROVISION**

Each Party that receives funds made available under title I or II of WIOA or under the Wagner-Peyser Act (29 U.S.C. §49, et. seq.) certifies that it will comply with Sections 8301 through 8303 of title 41 of the United States Code (commonly known as the “Buy American Act.”) and as referenced in WIOA Section 502 and 20 CFR 683.200(f).

### **CERTIFICATION REGARDING LOBBYING**

All Parties shall comply with the Byrd Anti-Lobbying Amendment (31 U.S.C. §1352), 29 C.F.R. Part 93, and 34 CFR part 82, as well as the requirements in the Uniform Guidance at 2 CFR 200.450. The Parties shall not lobby Federal entities using Federal funds and will disclose lobbying activities as required by law and regulations.

### **CONFIDENTIALITY**

All Parties expressly agree to abide by all applicable Federal, State, and local laws and regulations regarding confidential information, including PII from education records, such as but not limited to 20 CFR 603, 45 CFR 205.50, 20 USC 1232g, and 34 CFR 99, and 34 CFR 361.38, as well as any applicable State and local laws and regulations. In addition, in carrying out their respective responsibilities, each Party shall respect and abide by the confidentiality policies and legal requirements of all the other Parties.

### **CONFLICT OF INTEREST**

#### **CODE OF CONDUCT**

The following standards shall apply for the members of the Board, committees, staff, recipients, sub-recipients, contractors, and partners:

1. Adherence to the conflict-of-interest policies.
2. Adherence to procurement procedures that serve to minimize the appearance of conflicts, in addition to eliminating actual conflicts. Members who represent the One Stop Operator, Partners or actual or potential Service Providers and who serve on committees that oversee the One Stop System or the allocation of resources that would

potentially be allocated to their programs shall refrain from discussing or voting on any matter that would financially impact the programs they represent.

3. Any Member that develops or drafts specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. To avoid potential conflicts as circumstances change, Members whose employers may wish to participate in a future procurement will refrain from involvement in specification development or procurement processes.
4. It is the policy of the Board to discourage ex parte communications with any Board Member or any other person serving as an evaluator during the Request for Proposal (RFP) process. A Board Member or evaluator will not solicit nor receive any oral consideration. Any written communication to a Board Member or evaluator from potential contractors will be distributed to all Board Members by the Executive Director or his or her designee. Potential contractors who attempt to improperly influence the process will receive adverse scores. Any and all written communications should be provided to staff to be distributed to Board Members. Any other communication should be rejected by Members.
5. It shall be the policy of the Board that individual Members cannot commit the Board; rather, only the action by the Board, or the authorized actions of the Board Executive Committee, can constitute Board commitments.

## **ETHICAL PRINCIPLES**

It is the Board's policy to be knowledgeable of, and comply with, all applicable federal and state laws and regulations in a manner that will reflect a high standard of ethics. Compliance does not comprise one's entire ethical responsibility; rather it is a minimum, and an essential condition for adherence to mission and duties.

It is the Board's policy that its representatives be knowledgeable of emerging issues and professional standards in the field and conduct themselves with professional competence, fairness, efficiency, and effectiveness.

## **CONFLICT OF INTEREST**

It is the policy and expectation of the Board that its members will fulfill the fiduciary duties applicable to their service. Due to the legal and statutory structures of the Board, it is expected that conflicts of interest will arise, and this policy is intended to provide a framework that will allow the work of the Board to be achieved without the fact of or appearance of impropriety. The Board and all other agencies receiving direct financial assistance through WIOA shall avoid conflict of interest, real or apparent, by observing the following requirements:

1. Each grant recipient and subrecipient must maintain a written code of standards or conduct governing the performance of persons engaged in the award and administration of WIOA contracts and sub grants.
2. No individual in a decision-making capacity shall engage in any activity if a conflict of interest (real, implied, apparent, or potential) is involved. This includes decisions involving the selection, award, or administration of a sub grant or contract supported by Workforce Innovation and Opportunity Act (WIOA) or any other federal funds.
3. A Board member or a member of a Board committee cannot cast a vote or participate in any decision-making about providing services by such member (or by any organization that member directly represents) or on any matter that would provide any direct financial benefit to the member or to the member's organization.
4. Before any public discussions regarding the release of a Request for Proposal (RFP), or any matter regarding the release of funding or the provision of services, a Board Member or a member of a Board Committee must disclose any real, implied, apparent, or potential conflicts of interest before engaging in the discussion. The minutes of the meeting must reflect the disclosure.
5. Board and Committee Members or a member of agents of the organizations making awards cannot solicit or accept gratuities, favors, or anything of monetary value from awardees, potential awardees, or other parties to agreements.
6. Disciplinary actions may be taken up to and including termination of board membership for violation of this policy by any individual. The Executive Committee to the Board may evaluate any violations of these provisions on a case-by-case basis and recommend to the CEOs, if and what penalties, sanctions or other disciplinary action are appropriate.
7. Individuals shall not use for their personal gain, for the gain of others, or for other than officially designated purposes, any information obtained as a result of their committee, board or working relationships with the Board where that information is not available to the public at large or divulge such information in advance of the time decided by the Board for its release.
8. One Stop Operators must disclose any potential conflicts of interest arising from relationships with other service providers.
9. Any organization that has been selected or otherwise designated to perform more than one function related to WIOA must develop a written plan that clarifies how the organization will carry out its multiple responsibilities while demonstrating compliance with WIOA, corresponding regulations, relevant Office of Management and Budget circulars, and this Policy. This plan must limit conflict of interest or the appearance of

conflict of interest, minimize fiscal risk, and develop appropriate firewalls within that single entity performing multiple functions. The plan must be agreed to by the Board.

10. Membership on the Board or being a recipient of WIOA funds to provide training or other services, is not itself a violation of conflict-of-interest provisions of WIOA or corresponding regulations.
11. Each Member shall sign a Conflict of Interest Attestation denoting that the Conflict of Interest Policies have been read, are understood, and that the Member pledges to conduct him/herself in accordance with such policies and procedures during their service to the Board.

#### Disclosure

1. Any member that has, or believes he or she has, a conflict of interest must disclose such potential conflict in accordance with the procedures established by the Board in this policy and shall do so in writing on a prescribed form. The following are deemed conflicts of interest that create a duty of member to fully disclose such interest immediately:
  - a. If member has a significant personal financial interest in a proposed transaction involving the Board.
  - b. If member is employed, or is a Trustee, Director, Officer or Member of any individual, organization, or entity that shall have a direct or indirect financial interest in a proposed transaction involving the Board.
  - c. If a Member represents a third party either through personal, professional, or confidential relationship and such party shall have a financial interest in a proposed transaction involving the Board.
  - d. No Member shall participate in the selection, award or administration of a procurement supported by WIOA funds where, to the individual's knowledge, any of the following has a financial or substantial interest in any organization which may be considered for award:
    - i. the officer, employee, agent or Board Member;
    - ii. any Member of his or her immediate family;
    - iii. his or her partner, or;
    - iv. a person or organization which employs, or is about to employ, any of the above.
2. In accordance with 20 CFR 683.200(c)(5)(i) "...a State WDB member, Local WDB Member, or standing committee member must neither cast a vote on, nor participate in any decision-making capacity, on the provision of services by such member (or any organization which that member directly represents), nor on any matter which would provide any direct financial benefit to that member or that Member's immediate family."
3. In the event that a Board Member has an interest, directly or indirectly, in a business entity that would have a direct financial effect due to any official action taken by the Board, the Member shall declare, before a vote or discussion on the matter, the nature

and extent of the interest and shall not voluntarily discuss the proposed Board action. Any such member shall recuse him or herself from participation prior to the official vote. This limitation on discussion shall not prohibit the Member from providing factual information in response to direct questions concerning the matter from other Members. The disclosure shall be reflected in the minutes of the meeting.

4. If an award of funding is made with a Member violating the requirements of this policy, the Board is empowered to immediately suspend the obligation; the suspension is subject to review at the next regular or special meeting of the Board. The balance of the Board, excluding the Member(s) with potential conflict, will then determine what final corrective actions are necessary. Actions will be taken in accordance with this Conflict of Interest Policy, and could include removal of the Member, suspension of the obligation, termination of the obligation, or civil action to recover any monetary damages.
5. This policy is not meant to necessarily rule out transactions between the Board and other persons or entities where an interest or a relationship between the Member and such a person or entity exists. This policy does, however, require proper disclosure and documentation of such relationships so that all decisions regarding these possible transactions are made in the best interest of the Board. As stated in 20 CFR Section 683.200(c)(5)(ii) "Neither membership on the State WDB, the Local WDB, or an LWDB standing committee, nor the receipt of WIOA funds to provide training and related services, by itself, violates the conflict-of-interest provisions."
6. Nothing in this policy should be construed to prevent any Member's participation in WIOA programs. Board membership should not result in an employer receiving any more or any less consideration for trainees. What is important is to ensure that the officer, employee, agent, or Member does not approve his/her own training package, or contract for services, but that the system of approval allows for objective determinations.

### **DISCLAIMER**

This policy is based on the Board's interpretation of the statute, along with the Workforce Innovation and Opportunity Act; Final Rule released by the U.S. Department of Labor and federal and state policies relating to WIOA implementation. This policy will be reviewed and updated based on any additional federal and state guidelines.

### **CORRECTIVE ACTION**

New 5/14/2025

The Northeast Iowa Workforce Development Board (NEIWDB) is responsible for ensuring that all programs and activities operated under the Workforce Innovation and Opportunity Act (WIOA) are administered in compliance with applicable laws, regulations, state and local policies, and

contractual obligations. The purpose of this policy is to establish a clear and consistent framework for identifying, addressing, and resolving instances of non-compliance by WIOA Title I service providers and in matters of Equal Opportunity (EO). While the corrective action framework is similar for both areas, this policy separates EO and Title I components to ensure clarity in expectations and accountability.

To accomplish these responsibilities and satisfy its oversight role, the NEIWDB will impose penalties or conditions in the form of sanctions for any noncompliance issues, including non-performance, that have not been resolved based on state-imposed corrective actions identified in monitoring or other oversight reports. The NEIWDB will also impose sanctions for non-compliance regarding nondiscrimination and equal opportunity provisions of WIOA.

Corrective actions are applied when efforts to seek compliance with WIOA Section 116, Section 118, or 29 CFR 38 fail. Violations may result from a monitoring review or, depending on the type of violation, a discrimination complaint.

#### **Technical Violations**

- Include deficiencies that do not include discrimination. Technical violations may include, but are not limited to, failure to:
  - Ensure that the Participant Handbook is included in each WIOA Title I participant's case file, as it contains the "Equal Opportunity is the Law" notice.
  - Include the required tag lines in a communication
- Technical assistance may be provided to assist with deficiencies or noncompliance that cannot be resolved or corrected voluntarily. For each technical violation, the EO Officer will establish the minimum time frame necessary to correct the violation completely.

#### **Performance Violations**

- Achieving performance measures or milestones as outlined in the statement or scope of work and/or fidelity to the program design in the subrecipient's contract. The state performance sanctions policy mirrors the federal sanctions policy (TEGL 11-19) to the extent possible. However, because of the significance of a provider's impact on participants and local performance, implementation of state sanctions may occur sooner and not mirror the federal timelines. "Failure" to perform on any WIOA metric would be defined as the following:
  - Failure to meet 50% of targets for any metric on a quarterly basis, or
  - Failure to average 90% of targets for all measures across programs (i.e., Adult) on an annual basis.
  - Failure to meet at least 90% of the negotiated performance rate in any quarter.
- Signification monitoring findings and/or not working to address and/or close findings promptly, including but not limited to:
  - Compliance with uniform cost principles described in Office of Management and Budget (OMB) circulars.
  - Compliance with appropriate uniform administrative requirements for grants and agreements applicable for the type of entity receiving funds.
  - Compliance with WIOA and applicable federal, state and local regulations.

<ul style="list-style-type: none"> <li>○ Appropriate procurement, receipt, and payment for goods and services from vendors to ensure compliance with federal, state, and local requirements.</li> <li>○ Fiscal integrity</li> <li>○ Compliance with all Subrecipient agreement stipulations, including adherence to the state’s WIOA Provisions and Assurances.</li> </ul>
<p><b>Underspending</b> – Title I Service Provider must ensure that invoices adhere to a 60/40 cost allocation:</p> <ul style="list-style-type: none"> <li>• Participant expenditures must constitute at least 60% of total costs per invoice.</li> <li>• Administrative costs may not exceed 40% of total costs per invoice.</li> </ul> <p>All Year 2 funds must be fully expended by June 30 of the applicable year.</p> <p>For Youth program funding, allocations must follow these guidelines:</p> <ul style="list-style-type: none"> <li>• Funds must be evenly split, with 50% allocated to In-School Youth (ISY) and 50% to Out-of-School Youth (OSY).</li> <li>• A minimum of 20% of Youth funds must be dedicated to Youth Work Experience Programs (WEPs).</li> </ul>
<ul style="list-style-type: none"> <li>• Mismanagement of Title I Service Provider agreement, which impacts performance standards, expenditure rates, employer relations, and/or customer service.</li> </ul>
<ul style="list-style-type: none"> <li>• Other violations of legislative, regulatory, legal, and other Subrecipient agreement requirements.</li> </ul>

## SECTION I: WIOA TITLE I SERVICE PROVIDER COMPLIANCE

**Title I Overview:** This section applies to the WIOA Title I Service Provider contracted by the NEIWDB. The provider must comply with federal, state, and local regulations, performance expectations, and operational requirements.

### A. PERFORMANCE VIOLATIONS

Violations include, but are not limited to:

- Failure to meet negotiated performance metrics.
- Inadequate service delivery or participant engagement.
- Lack of consistent staffing in designated service locations (e.g., no full-time staff at a required AJC site).

### B. FISCAL COMPLIANCE VIOLATIONS

Violations include:

- Mismanagement of WIOA funds.

- Failure to maintain appropriate documentation for expenditures.
- Inappropriate spending (e.g., not adhering to the 60%/40% out-of-school youth expenditure requirement).

### C. PERFORMANCE MONITORING

The NEIWDB will monitor the Title I Service Provider quarterly and includes:

- 1) Participant outcomes (enrollment, employment, credential attainment).
- 2) Compliance with contract requirements.
- 3) Data reporting from the program's system of record.
- 4) Monitoring reports.
- 5) Fiscal reporting and expenditure reviews.

### D. PERFORMANCE MEASURES

Key indicators include:

- Employment Rate (2<sup>nd</sup> and 4<sup>th</sup> Quarter Post-Exit)
- Credential Attainment
- Measurable Skill Gains
- Median Earnings
- Program Effectiveness

Refer to the current year's negotiated performance rates for more information.

### E. CORRECTIVE ACTION PROCESS

The following outlines the progressive steps the Northeast Iowa Workforce Development Board (NEIWDB) and the Title I Service Provider will follow to address program performance, financial reporting, and monitoring deficiencies. These steps supplement any Title I Service Provider agreement or performance policies outlined in the agreement.

#### 1) Step 1: Identification of Deficiency and Initial Action

When a deficiency in performance, compliance, or reporting is identified, the NEIWDB will issue a warning letter to the Title I Service Provider's signatory or equivalent position, with a copy to the NEIWDB. In certain cases, where specific performance triggers are met (e.g., failure to meet federally mandated performance benchmarks, significant financial reporting discrepancies, non-compliance with participant eligibility, or repeated findings in monitoring reports), the NEIWDB may bypass the warning letter and immediately initiate a Corrective Action Plan (CAP).



## **2) Step 2: Response to Warning Letter**

- The Title I Service Provider must provide a response to the NEIWDB within thirty (30) business days of receiving the warning letter. The response should include a plan for resolving the deficiency.
- NEIWDB may request a follow-up meeting with the Title I Service Provider to discuss performance issues and provide technical assistance as needed.

## **3) Step 3: Corrective Action Plan (CAP)**

If the deficiency is not resolved after the warning letter, the Title I Service Provider must submit a Corrective Action Plan within 15 business days from the request. The CAP must include:

- The nature of the deficiency
- The root cause of the deficiency
- The corrective actions to be taken
- Responsible parties
- Timelines for completion
- Any request for technical assistance from NEIWDB

## **4) Step 4: Follow-Up Monitoring and Review**

The NEIWDB will follow up within 30 business days of accepting the CAP to ensure the deficiencies are being addressed.

- If the corrective actions are successful, the NEIWDB will notify the Title I Service Provider that the corrective action process is complete.
- If deficiencies persist, the NEIWDB will initiate the formal Corrective Action Plan process by sending a letter to the Title I Service Provider's signatory, with a copy to the Administrator or equivalent.

## **5) Step 5: Resolution or Continued Action**

- The Title I Service Provider's shall have thirty (30) business days from the CAP submission date to resolve the deficiency. If an extension is needed, the NEIWDB and Title I Service Provider may mutually agree to extend the timeline.
- NEIWDB staff will conduct follow-up monitoring, including requests for progress updates or additional information as necessary.

## **6) Step 6: Sanctions for Unresolved Deficiencies**

If the deficiency is not satisfactorily resolved within the specified time, the NEIWDB may take one or more of the following actions:

- Extension of the Corrective Action Plan period
- De-obligation of funds
- Ineligibility for continued funding or contract renewal
- Ineligibility for future procurements for a specified period
- Termination of the agreement

## **7) Step 7: De-Obligation or Termination:**

If de-obligation of funds or termination of the agreement is deemed necessary, the NEIWDB will present the issue as an action item to the Board. Written notification of this action will be sent to the Title I Service Provider's signatory and the Title I Director.

## F. MONITORING AND DOCUMENTATION

NEIWDB staff will document all corrective actions and resolutions in the relevant performance or compliance files.

All corrective actions will be reviewed periodically until the deficiencies are resolved and the issue is considered closed.

## G. APPEALS PROCESS

### 1) Right to Appeal

If a Title I Service Provider is notified of the possibility of being sanctioned, they have the right to appeal the decision to the NEIWDB.

### 2) Timeline for Appeal

The Title I Service Provider must submit a formal appeal within 30 business days from the date of receiving written notification of the sanction.

### 3) Appeals Process

- The appeal should be submitted in writing to the NEIWDB, detailing the reasons for the appeal and any supporting documentation.
- Upon receiving the appeal, the NEIWDB will review the circumstances and schedule a meeting, if necessary, to hear the provider's case.
- The NEIWDB will issue a decision on the appeal within 30 business days of receiving the appeal.

### 4) Appeal Outcomes

After review, the NEIWDB may either uphold the sanction, reduce the sanction, or take other corrective actions based on the appeal's outcome.

Upon a Title I Service Provider's being notified of the possibility of being sanctioned, the Subrecipient has the right to appeal the decision to the NEIWDB. The Title I Service Provider's will have 30 business days from the date of the written notification of sanction to submit an appeal.

## H. DEFINITIONS:

- **Sanction:** A sanction is a penalty or a remedial action required for noncompliance with applicable federal, state, and local laws, regulations, agreement provisions/grant agreements or conditions, or policies. Sanctions may be applied based on failure to meet

performance targets, financial reporting discrepancies, or other compliance issues as outlined in the Title I Service Provider agreement.

For Title I programs, sanctions may be based on the negotiated levels of performance agreed upon for the five WIOA performance measures (e.g., employment rate, median earnings, credential attainment, etc.).

For non-participant servicing subrecipients, sanctions will be based on the deliverables specified in the agreement and Statement/Scope of Work.

- **Technical Assistance:** Refers to the support and guidance provided by the NEIWDB to help Title I Service Providers identify and correct the causes of performance failure. This support may include training, resources, best practices, and other assistance to ensure service delivery aligns with performance expectations.

---

## SECTION II: EQUAL OPPORTUNITY (EO) COMPLIANCE

The Northeast Iowa Workforce Development Board (NEIWDB) is committed to ensuring compliance with all applicable Equal Opportunity (EO) regulations as required under WIOA Section 188 and 29 CFR Part 38. This policy outlines the process for addressing any EO deficiencies identified through internal monitoring or external reports. The NEIWDB strives to maintain a workforce development system that is equitable and accessible to all individuals, regardless of race, color, religion, sex, national origin, age, disability, or political affiliation.

When EO violations or deficiencies are identified, corrective action may be required to ensure compliance with EO regulations and eliminate discriminatory practices.

Equal Opportunity Violations
<ul style="list-style-type: none"><li>• As required under WIOA Section 188 and 29 CFR Part 38, the NEIWDB is committed to ensuring equal opportunity and non-discrimination in all workforce development services. Include but are not limited to:</li></ul>
<ul style="list-style-type: none"><li>○ Discrepancies of disparate treatment (disparate treatment intentionally treating members of a protected groups differently based on their protected status);</li></ul>
<ul style="list-style-type: none"><li>○ Disparate impact (disparate impact means use of policies or practices that are neutral may or may not appear neutral, but which has a disproportionate impact on members of protected groups, and/or are not job related and consistent with business necessity; and</li></ul>
<ul style="list-style-type: none"><li>○ Failure to provide reasonable accommodations.</li></ul>
<ul style="list-style-type: none"><li>○ Language access services will be enhanced, including interpretation and translation services for LEP individuals.</li></ul>

---

## A. EQUAL OPPORTUNITY MONITORING

The Local Equal Opportunity (EO) Officer will conduct an annual internal review of policies, customer data, public postings, and service accessibility to identify and address any disparities. Additionally, the Local EO Officer will perform onsite monitoring annually to ensure compliance with WIOA Section 188 and related regulations, reinforcing equal access and non-discriminatory practices across all workforce development services.

Operations Managers at each American Job Center are responsible for overseeing daily compliance with these regulations. They ensure that policies and procedures align with federal and state equal opportunity requirements, addressing any deficiencies identified during monitoring reviews. By actively overseeing compliance efforts, Operations Managers play a crucial role in maintaining equitable and inclusive workforce services across all American Job Centers.

---

## B. TECHNICAL VIOLATIONS (EO-SPECIFIC)

Technical violations of EO regulations may include, but are not limited to:

- Incomplete or improperly maintained EO files.
- Failure to meet required EO notification timelines.
- Improper signage or lack of ADA accommodations.
- Failure to provide adequate language access services for individuals with Limited English Proficiency (LEP).

---

## C. DISCRIMINATION VIOLATIONS AND PROCEDURES

In the event of a discrimination-related issue, the following actions will be taken:

### Complaint Intake and Initial Steps

- Complaints will be handled by the Iowa **WORKS** Operations Manager.
- Operations Managers will explain the complaint process, offer applicable services, and request a signed complaint form or written statement.
- All discriminatory complaints must be logged and referred immediately to the Local Equal Opportunity (EO) Officer if they cannot be resolved locally or fall outside of Iowa Workforce Development (IWD) authority.

### Investigation and Documentation

- If accepted for investigation, a confirmation letter or request for more information will be sent.
- All complaint records must be stored securely and maintained for three years from the resolution date.

### **Referral to Other Agencies**

- If appropriate, complaints will be referred to external agencies such as the Equal Employment Opportunity Commission (EEOC), which accepts complaints online or through the state agency.

## **D. CORRECTIVE ACTION PROCESS**

### **1. Identification of EO Deficiencies**

#### **Corrective Action Policy – Equal Opportunity Monitoring**

The Local EO Officer will identify deficiencies through the annual monitoring process, including onsite visits. If a violation is found, the EO Officer will issue a written warning to the organization's designated signatory or equivalent authority, with a copy provided to the NEIWDB Program Manager.

#### **Examples of EO deficiencies may include:**

- Disparate treatment or impact based on protected characteristics.
- Failure to provide reasonable accommodations.
- Inadequate language access for LEP individuals.
- Absence of required EO statements on public-facing materials.

*Note:* In cases of serious or repeated violations, the NEIWDB may bypass the warning stage and proceed directly to issuing a Corrective Action Plan.

### **2. Response Requirement**

Organizations receiving a warning letter must submit a written response within 30 business days of issuance. The response should include:

- Acknowledgment of the deficiency.
- A detailed plan and timeline for resolution.
- Identification of any support or technical assistance needed.

A follow-up meeting may be scheduled to discuss findings and potential remedies.

### **3. Corrective Action Plan (CAP) Development**

If a formal Corrective Action Plan is necessary, the organization must submit the CAP within 30 business days of receiving the notice. The CAP should include:

- A description of the specific EO deficiency.
- Identification of the root causes.
- Action steps for correction.
- A timeline for implementation.
- A request for technical assistance if applicable.

### **4. CAP Implementation and Monitoring**

Upon acceptance of the Corrective Action Plan, the organization has 30 business days to implement corrective actions unless a longer timeline is approved in writing by the NEIWDB. The NEIWDB EO Officer will oversee implementation and may request documentation or conduct additional site visits to verify progress.

### **5. Resolution and Closure**

Once the corrective actions are fully implemented, the organization must submit documentation demonstrating compliance. The NEIWDB will then issue written confirmation that the deficiency has been resolved and that the organization is no longer under corrective action.

### **6. Non-Compliance and Sanctions**

If the organization fails to meet the corrective action requirements within the specified timeframe, the NEIWDB may impose the following sanctions:

- Extension of the Corrective Action Plan with enhanced oversight.
- Referral to the Iowa Workforce Development EO Officer for state-level enforcement.
- Withholding or de-obligation of WIOA funds.
- Termination or suspension of funding agreements.
- Restriction from future procurements or contracts for a specified period.

### **7. Appeals Process**

Organizations may appeal any sanctions imposed due to unresolved EO violations. Appeals must be submitted in writing within 30 business days of the sanction notice. The appeal will be

reviewed by the NEIWDB in accordance with the local grievance procedure and federal regulations.

---

#### E. EO TIMEFRAMES AND RESPONSIBILITIES

**Initial Notification:** Within 5 business days of identifying a deficiency.

**Technical Assistance:** Provided by the NEIWDB within 10 business days of the initial notification.

**Corrective Action Plan Submission:** Due within 15 business days of identifying a violation.

**Follow-Up Review:** Conducted within 30 calendar days of CAP acceptance.

---

#### F. ROLES AND RESPONSIBILITIES

- **Local EO Officer:** Conducts monitoring, issues findings, and oversees corrective actions.
- **Operations Managers:** Ensure daily compliance with EO regulations and oversee corrective actions.
- **NEIWDB Staff:** Assist in implementing corrective actions and provide necessary technical assistance.

#### References

- WIOA (Public Law 113-128)
- WIOA Section 116(g) – Performance Accountability
- WIOA Final Rule, 20 CFR 677.220 – Under what circumstances may a corrective action or sanction be applied to local areas for poor performance?
- WIOA Final Rule, 20 CFR 677.225 – Under what circumstances may local areas appeal a reorganization plan?
- Training and Employment Guidance Letter (TEGL) 11-19 – Negotiations and Sanctions Guidelines for the WIOA Core Programs
- Title 2 Code of Federal Regulations (CFR) Part 200: “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Uniform Guidance)
- Title 2 CFR Part 2900: “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” (Department of Labor [DOL] Exceptions)
- WIOA Final Rules
- Title 20 United States Code (U.S.C.) Section 1401: “Definitions”
- WIOA Section 188 29 CFR Part 38
- WIOA Section 20 CFR § 678.600

## CREDIT CARD

New 11/21/2022

The Northeast Iowa Workforce Development Board (NEIWDB) will have one credit card and will be used for the purposes of purchasing office supplies, expenses incurred for business travel, and online purchases, registrations, and membership dues and other related expenses required to conduct NEIWDB business.

1. The credit card has a credit limit of \$4,000.00 and will have the Executive Director as the name on the card.
2. The credit card will be issued through Central Iowa Juvenile Detention Center (CIJDC).
3. Authorized users include the Executive Director of the Northeast Iowa Workforce Board.
4. All charges will be at the discretion of the Executive Director or the Executive Committee.
5. The Executive Director is responsible for maintaining the credit card and tracking its balance. The Executive Director is responsible for reconciling the statement each month and submitting all supporting documentation required for payment including receipts.
6. The credit card is board property and when making a purchase it is making a financial commitment on behalf of the board. Expenses should meet all WIOA guidelines for approved expenditures.

## DEBARMENT AND SUSPENSION

All Parties shall comply with the debarment and suspension requirements (E.O.12549 and 12689) and 2 CFR part 180 and as adopted by the U.S. Department of Labor at 29 CFR part 2998 and by the U.S. Department of Education at 2 CFR 3485.

## DISAGREEMENTS AND DISPUTE RESOLUTION

If a dispute arises, a complaint may be submitted in writing to the executive director to the board within 30 calendar days of the date of the event or condition that is alleged to be in violation of WIOA.

The parties shall meet, in person and in good faith, to make every reasonable attempt to resolve the problem within thirty (30) days of discovering a material dispute. The parties agree that informal dispute resolution, including mediation, should an in-person meeting prove unsuccessful, shall be attempted prior to seeking formal recourse.

## DRUG AND ALCOHOL-FREE WORKPLACE

All Parties of the local area will comply with the Drug-Free Workplace Act of 1988, 41 U.S.C. 702 et seq., and 2 CFR part 182 which require that all organizations receiving grants from any Federal agency maintain a drug-free workplace. The recipient must notify the awarding office if an employee of the recipient is convicted of violating a criminal drug statute.



## FIREWALLS

The purpose of this Policy is to provide guidance in the Board's commitment to guard against problems arising from real, perceived, or potential conflicts of interest not only through sound conflict of interest policies, but also through the establishment of suitable firewalls in the event of such conflicts.

---

### A. DEFINITIONS

Conflict of Interest - A conflict between the official responsibilities and the private interests of a person or entity that is in a position of trust. A conflict of interest would arise when an individual or organization has a financial or other interest in or participates in the selection or award of funding for, an organization. Financial or other interest can be established either through ownership or employment.

Firewall - An established policy or procedure that acts as a barrier or protection against an undesirable influence, outcome, or authority. Examples of firewalls include, but are not limited to, organizational arrangements that provide clear separation of duties and responsibilities, reporting hierarchy of managers and staff that provide clear separation between job duties and responsibilities, and conflict of interest/confidentiality/disclosure agreements.

---

### B. FIREWALL GUIDELINES

Conflict of Interest Policy: All members of the Board, its established committees and the individuals/organizations functioning as staff to the board shall sign a conflict of interest attestation acknowledging receipt, review, and acceptance of the policy. These members have a continual duty to recognize potential conflict of interest upon the occurrence of any situation that would give rise to a potential or actual conflict of interest.

Multiple Roles: When a single entity fulfills more than one of the following roles including, but not limited to, Fiscal Agent, Board Staff, OSO or direct service provider, such entity is required to adhere to the guidelines set forth in this Policy.

---

### C. CONTROL ACTIVITIES – 2 CFR 200.318(C)(1)

The organization maintains standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts. The standards of conduct provide that no employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. The standards of conduct state that a conflict of interest would arise when the employee, officer, or agency, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has

a financial or other interest in or tangible personal benefit from a firm considered for a contract. Officers, employees, and agents of the non-federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contactors or parties to subcontracts. The standards of conduct provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-federal entity.

---

#### D. FISCAL AGENT

Role: The role of the Fiscal Agent is limited to accounting and funds management functions such as receiving funds, ensuring sustained fiscal integrity and accountability for expenditures of funds in accordance with the Office of Management and Budget circulars, the Workforce Innovation and Opportunity Act (WIOA) and the corresponding federal regulations and state policies. The Fiscal Agent is responsible for responding to audit financial findings, maintaining proper accounting records and adequate documentation, and preparing of financial reports. The Fiscal Agent must also, provide financial assistance to subrecipients regarding fiscal issues.

The Fiscal Agent shall ensure that an audit of the Board's financial statements and schedule of expenditures of federal awards is conducted by an independent third-party auditor on an annual basis. Such audit shall also include a review of the internal controls. The Fiscal Agent shall present the audit results to the CLEO and the Board annually.

---

#### E. EXECUTIVE DIRECTOR

Role: The role of the Executive Director is to oversee the operation and administration of the Northeast Iowa Local Workforce Development Board. The Executive Director is charged with assisting in carrying out the functions described in the local board required functions.

---

#### F. ONE-STOP OPERATOR

Selection of OSO: The Board shall select its OSO through a competitive procurement process at least once every three (3) years (WIOA Sec. 121 [d][2][A]). As part of that process, the Board must clearly articulate the expected role(s) and responsibilities of the OSO. When selecting the OSO, the Board shall comply with the federal procurement standards outlined in the Uniform Guidance, as well as any state or local procurement policies.

Conflicts with Title I Service Providers: The OSO will report any concerns or issues relating to conflicts of interest with any Title I service provider directly to Board or the Board Executive Director.

Duties: The primary role of the OSO is coordinating service delivery among the partners in the one-stop system. One-Stop Operators must comply with Federal regulations, and

procurement policies, relating to the calculation and use of profits. The OSO will coordinate the service delivery of required one-stop partners and service providers. The OSO has no staffing authority over the hiring, firing, termination, promotion, etc. of staff members.

The OSO reports to the Board's Executive Director.

---

#### G. TITLE I SERVICE PROVIDERS

Selection of Title I Service Providers: Providers of Title I Adult, Dislocated Worker and Youth programs will be competitively procured in accordance with federal and state policies.

Conflicts with One-Stop Operators: Providers delivering Title I Adult/Dislocated Worker services and Title I Youth services will report any concerns or issues relating to conflicts of interest with the OSO directly to the Board or the Executive Director to the Board.

If the Title I Adult/Dislocated Worker program provider and/or the Title I Youth program provider is selected to serve as the OSO, firewalls must be in place to ensure the staff members providing Title I services are not performing OSO duties and vice versa.

The work and performance of the Title I service providers shall be monitored by the Board Executive Director in accordance with the Board's monitoring policy. Any issues related to the provision of services by a Title I service provider shall be handled by the Executive Director of the Board and a corrective action notice shall be issued. Should such issues not be resolved (or a plan for resolution be in place) within sixty (60) days of being identified, then the Executive Director will consult with the Board Chair and outstanding issues will be addressed by the Executive Committee of the Board.

Reporting: Title I Service Providers report to the Board's Executive Director.

---

#### H. BOARDS AND COMMITTEES

Role in Conflicts: The Board will be responsible for all conflicts of interest oversight and monitoring activities, including but not limited to, imposing separation of duties and/or functions among individuals and entities party to this policy and restriction of access to physical and electronic information. Members of the Board will be required to recuse themselves/abstain from any vote where a conflict of interest exists. In the event of a conflict of interest with staff, such person will not be involved in any selection process, meetings, or discussions. All conflicts will be shared with the CLEO and the Board Chair. In the event the conflict involves the CLEO, the Board Chair will communicate with the Executive Committee of the Board. In the event the conflict involves the Board Chair, the CLEO will communicate with the Board Vice Chair and other Executive Committee members. When a conflict involves staff, the CLEO, Board Chair, and/or staff member(s)

not involved in the conflict will assume the duties and functions of the aforementioned staff.

The Established Conflict of Interest Standards State: Members must neither cast a vote on, nor participate in any decision-making capacity on the provision of services by such member or any organization which that member directly represents nor on any matter which would provide direct financial benefit to that member or that member's immediate family. Please see the conflict of interest policy and 20 CFR 683.200(c)(5)(i) for more information.

Recusal from Vote/Quorum: The existence of a quorum is not affected by the recusal or abstention of a member if a quorum is initially present at the meeting. In situations where a member recuses himself/herself from a vote, any actions voted on after the departure of that member may still be passed as long as a majority of the initial quorum approves the action.

---

## H. INDIVIDUALS AND ORGANIZATIONS SERVING AS STAFF TO THE BOARD

Executive Director: The Executive Director is responsible for the day-to-day operations of the Board and is charged with all local board required functions. The Executive Director is also responsible for preparing all meeting notices, documentation, and correspondence for board members.

Fiscal Agent: The Agent is responsible for accounting and fund management functions and also provides regular financial reports to the Board. The fiscal agent does not have the authority to approve/deny funding and/or payments. The Fiscal Agent is hired by the Northeast Iowa Local Workforce Development Board and reports directly to the Executive Director of the Board.

## GRIEVANCE AND COMPLAINTS PROCEDURES

### *Civil Rights*

No action may be taken in selecting customers, in assigning them to services, employment or training site, or in exiting them from WIOA or from a WIOA activity if such action is based on discrimination with regard to race, color, national origin, political affiliation, or belief, religion, sex, disability, or age or marital status.

### *Additional Rights and Benefits*

- Each participant shall be assured of worker's compensation or of comparable insurance coverage, as appropriate.
- Each participant, before starting WIOA sponsored services, training, or employment, shall be informed of all rights and benefits to which the customer may be entitled in

connection with such training or employment. This shall be provided in a program orientation session.

- Each participant will receive individualized counseling services and be an active partner in the development of an Individual Employment Plan (IEP) or Individualized Service Strategy (ISS), based on individual service strategies developed for the participant. The participant shall receive a copy of the IEP or ISS.
- Participants will not be permitted to work, be trained, or receive services under conditions, which are unsanitary or hazardous in any way to their health or safety.
- Each applicant/participant shall be informed of the complaint and hearing procedure applicable to the WIOA activity in which they are enrolled. The right to file a complaint about any aspect of WIOA is granted by law to all applicants and participants.

---

## COMPLAINTS AND GRIEVANCES

These procedures are for individuals who have been denied access to WIOA Basic or Individualized Services. Service providers may provide customers with access to programs and services operated and administered by other organizations and agencies.

Applicants/clients/participants may file a complaint about any aspect of their WIOA participation. If an individual has a complaint or grievance about programs or services administered by other organizations and agencies, he/she may need to process the complaint or grievance in accordance with the rules and procedures in place for that entity. Except for complaints alleging fraud, criminal activity, discrimination or sexual harassment, complaints shall be made within one year of the alleged occurrence.

### A GRIEVANCE MAY BE FILED IF:

- The grievance is regarding the WIOA programs or if there has been a violation of the law concerning a WIOA program and the filer was affected by that violation.
- The individual seeking WIOA services was denied a program service or benefit for which he/she was eligible.

### TYPES OF COMPLAINTS NOT COVERED BY THESE PROCEDURES

1. WIOA is not an entitlement program. This means that even if an individual is eligible to receive services under these programs, the individual may be denied access to a specific service allowable under program rules. This is not considered a violation of the law and may occur, because:
  - a. There may not be sufficient funds to enroll an individual into a program or provide a service at the time of application or the time of need for the service.
  - b. Local Areas determine the types and mix of services to offer and may have decided not to offer a particular benefit or service. In such instance, there would be no grounds upon which to file a grievance. A copy of the applicable policy will be made available upon request.

- c. Under WIOA there are eligibility requirements and prioritization criteria. Individuals who are seeking services but who do not meet the eligibility or prioritization criteria cannot be served with these funds.
- d. Local Areas have the flexibility to impose requirements or to develop policies and procedures applicable to the programs and services. Requirements, policies, and procedures that have been adopted may restrict access to a program service or may limit the availability of a program service.

## COMPLAINT PROCEDURE

Complaints must be filed within 180 days from the start date of the event or condition that is alleged to be a violation of WIOA.

### *Informal Resolution*

Every attempt must be made to work things out informally before a grievance can be filed. Concerns must first be discussed with WIOA staff with whom the individual is currently working. If the matter is not resolved, a meeting with the **Title I Director** may be requested. This informal resolution process must be completed within 10 business days from the date the complaint was filed. If all parties are satisfied, the complaint will be considered resolved.

### *State and Federal Resolution*

If an individual believes to have been subjected to discrimination under WIOA Title I-financially assisted program or activity, a complaint may be filed within 180 days from the date of the alleged violation with either: the recipient's Equal Opportunity Officer (or the person whom the recipient has designated for this purpose);

Iowa State WIOA EO Officer  
1000 East Grand Ave.,  
Des Moines, Iowa 50319-  
Ph. (515) 281-8149

Or

Director, Civil Rights Center (CRC)  
U.S. Department of Labor  
200 Constitution Avenue NW, Room N-4123  
Washington, DC 20210

If a complaint is filed with the recipient, the filer must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever comes sooner), before filing with the Civil Rights Center (see address above). If the recipient does not provide a written notice of Final Action within 90 days of the day on which the complaint was filed, the filer does not have to wait for the recipient to issue that Notice before filing a complaint with CRC. However, the CRC complaint must be filed within 30 days of the 90-day deadline (in other words,

within 120 days after the day on which the complaint was filed with the recipient), If the recipient does provide a written Notice of Final Action on the complaint, but the filer is dissatisfied with the decision or resolution, a complaint may be filed with CRC. The CRC complaint must be filed within 30 days of the date on which the notice of final action was received.

### ***What Information Should a Complaint Contain***

The complainant may also submit a written and signed complaint narrative, at any level, containing the information required under 29 CFR 38.73, which describes what a complaint must contain as follows:

1. The complainant's name and address (or another means of contacting the complainant);
2. The identity of the respondent (the individual or entity that the complainant alleges is responsible for the discrimination);
3. A description of the complainant's allegations. This description must include enough detail to allow the State WIOA EO Officer or the Director of the DOL CRC as applicable, to decide whether.
  - a. CRC or the recipient, as applicable, has jurisdiction over the complaint;
  - b. The complaint was filed in time; and
  - c. The complaint has apparent merit; in other words, whether the complainant's allegations, if true, would violate any of the nondiscrimination and equal opportunity provisions of WIOA or 29 CFR Part 38; and.
  - d. The complainant's signature or the signature of the complainant's authorized representative.

The complaint may be filed with the IowaWORKS EO Liaison to be forwarded to the State WIOA EO Officer for processing; at Iowa Workforce Development, 1000 East Grand Avenue, Des Moines, Iowa 50319-0209, Telephone 515-281-8149. Hearing Impaired dial 711. Or complainants may be filed with the U.S. Department of Labor, Director, Civil Rights Center, 200 Constitution Ave. NW, Room N-4123, Washington, DC 20210. Discrimination complaints must be submitted within 180 days. All discrimination complaints filed must be submitted within 180 days of the alleged violation. An extension of the 180-day filing period may be allowed by the CRC when the complainant demonstrates good cause. Filing a complaint at the state level shall be deemed to have occurred on the date that written notice is actually received by Iowa Workforce Development (IWD).

The State WIOA EO Officer shall accept and investigate only those discrimination complaints within IWD's jurisdiction alleging a violation of Section 188 of the WIOA or 29 CFR 38 by a respondent.

---

## **WORKFORCE INNOVATION & OPPORTUNITY ACT (WIOA)**

### ***EQUAL OPPORTUNITY IS THE LAW NOTICE***

It is against the law for this recipient of Federal financial assistance to discriminate on the following basis:

- Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or,
- Against any beneficiary of, applicant to, or participation in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I financially assisted program or activity.

The recipient must not discriminate in any of the following areas:

- Deciding who will be admitted, or have access, to any WIOA Title I financially assisted program or activity;
- Providing opportunities in, or treating any person with regard to, such a program or activity; or
- Making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

## INCENTIVE PAYMENT POLICY (BOARD STAFF)

New 7/8/2024

### Purpose:

The purpose of this policy is to establish guidelines and procedures for the provision of incentive payments to the Northeast Iowa Workforce Development Board staff members in accordance with Uniform Guidance under 2 CFR 200.430. This policy aims to recognize and reward exceptional performance, thereby enhancing overall organizational effectiveness and employee satisfaction.

### Background:

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) under 2 CFR 200.430 provides the framework for compensation, including incentive payments, for employees whose salaries are charged to federal awards. Incentive payments must be based on documented performance measures and must be



consistent with the terms and conditions of the federal award. This policy ensures compliance with these regulations while promoting high standards of performance among the Northeast Iowa Workforce Development Board staff.

### **Policy Statement:**

The Northeast Iowa LWDB is committed to recognizing and rewarding exceptional Board staff performance that contributes to the achievement of organizational goals and WIOA program objectives. Incentive payments shall be awarded to eligible Board staff members based on predefined performance criteria, ensuring fairness, transparency, and compliance with federal regulations.

### **Eligibility:**

All Northeast Iowa LWDA Board staff members employed by the nonprofit organization and contributing directly to WIOA program goals are eligible for incentive payments, provided they meet the established performance criteria. This ensures that all eligible staff members who actively contribute to the Northeast Iowa Workforce Development Board's mission and objectives have the opportunity to be considered for incentive payments based on their performance excellence.

### **Performance Criteria:**

Incentive payments are contingent upon meeting or exceeding specific performance criteria established by the Northeast Iowa Workforce Development Board. These criteria include, but are not limited to:

- Compliance and Risk Management: Staff must ensure adherence to all regulatory requirements and organizational policies, contributing to risk mitigation and the maintenance of high compliance standards.
- Customer Service Excellence: Staff must consistently provide exceptional service to program participants, partners, and other stakeholders, demonstrating responsiveness, empathy, and professionalism.
- Leadership and Initiative: Staff must show strong leadership qualities, take initiative in their roles, and effectively lead projects or teams to successful outcomes.
- Innovation and Improvement: Staff must demonstrate innovative approaches to problem-solving and contribute to continuous improvement initiatives within the organization.

- Job Knowledge and Skills: Staff must demonstrate a high level of job knowledge and proficiency in the skills required for their position, ensuring they stay updated with the latest industry trends and best practices.
- Problem Solving and Quality of Work: Staff must exhibit excellent problem-solving abilities, producing high-quality work that meets or exceeds organizational standards and contributes to the achievement of the Northeast Iowa LWDB's goals.
- Collaboration and Teamwork: Staff must exhibit a high level of collaboration, teamwork, and contribution to a positive work environment.
- Communication with Stakeholders and Partners: Staff must maintain effective communication with stakeholders, board members, partners, colleagues, ensuring clarity, transparency, and satisfaction in all interactions.

### **Approval Process:**

The approval process for incentive payments involves multiple steps to ensure transparency, fairness, and compliance with federal regulations.

1. Establishment of Criteria: The Northeast Iowa Executive Committee will establish clear and measurable performance criteria aligned with WIOA objectives. These criteria will be communicated to all staff members to ensure understanding and alignment with organizational goals.
2. Performance Evaluation: Performance evaluations will be conducted to assess staff achievements against the established performance criteria. Board staff performance will be evaluated annually. The Executive Director will be reviewed/evaluated by the NEIWDB Chair. As part of the evaluation process, a survey will be sent to Northeast Iowa LWDB Members, CEOs and Core Partners. Other board staff members who directly report to the Executive Director will be reviewed/evaluated by the NEIWDB Executive Director. The Executive Director will forward evaluations to the NEIWDB Chair for further review.
3. Recommendation: The NEIWDB Chairperson may recommend eligible Board staff members for incentive payments based on their performance evaluations to the Executive Committee.
4. Review and Approval: The NEIWDB Executive Committee will review the recommendations and approve incentive payments, ensuring adherence to budgetary constraints and compliance with 2 CFR 200.430 and with this policy.
5. Documentation: All decisions and justifications for incentive payments will be thoroughly documented and maintained for audit purposes.

### **Incentive Payment Structure:**

- Incentive payments will be monetary and awarded either a lump sum or a percentage of the annual salary, depending on the discretion of the Northeast Iowa LWDB and in accordance with budgetary constraints.
- The availability of funds for incentive payments will be considered on a case-by-case basis, taking into consideration the financial situation and priorities of the Northeast Iowa Workforce Development Board (NEIWDB).
- Payments will be distributed when circumstances warrant, contingent upon the completion of the performance evaluation process and approval by the NEIWDB Executive Committee. This ensures that incentive payments are aligned with organizational goals and budgetary consideration.

### **Documentation:**

The Northeast Iowa Workforce Development Board recognizes the importance of maintaining accurate and comprehensive documentation to support the implementation of the incentive payment policy and demonstrate compliance with federal regulations and organizational procedures. The documentation requirements include the following:

- Detailed records will be maintained of performance evaluations conducted for each board staff member, documenting the assessment of performance against established criteria, feedback provided, survey results, and any recommendations for incentive payments.
- Board staff members who have been recommended for incentive payments will have proper written documentation outlining the basis for the recommendation, including specific achievements, contributions, and alignment with performance criteria.
- The Northeast Iowa Board Chair, and Executive Director will maintain records for all reviews and approvals related to incentive payments, including meeting minutes, decision summaries, and any additional documentation supporting the approval process.
- The Fiscal Agent will maintain all supporting documentation for payment processing purposes.
- The Northeast Iowa LWDB Executive Committee will ensure that incentive payments are reasonable, necessary, and consistently applied according to the organization's established policies.
- Documentation will be maintained for audit purposes and to ensure transparency and accountability. This documentation will be forwarded to the Employer of Record.

- The Northeast Iowa LWDB budget will have a specific line item outlining the incentive payment awarded directly to board staff members.

#### **Compliance and Monitoring:**

To ensure compliance with 2 CFR 200.430 and this policy, the Northeast Iowa LWDB will:

- Regularly review and update the incentive payment policy as needed to assess its effectiveness, relevance, and alignment with federal regulations and organizational objectives. Updates will be made as necessary to reflect changes in legislation, best practices, or organizational needs.
- Conduct periodic audits of incentive payment processes and documentation to verify compliance with federal regulations and internal policies. These audits will encompass a comprehensive review of all relevant procedures, records, and transactions to ensure accuracy, transparency, and integrity in the incentive payment process.

#### **Conflict of Interest:**

- Incentive payments must not create any actual or perceived conflict of interest.
- Board staff involved in the evaluation and approval process must recuse themselves from decisions where a conflict of interest may arise.

#### **Policy Review and Amendment:**

This policy will be reviewed as needed by the NEIWDB Executive Committee and amended as necessary to ensure continued compliance with WIOA, 2 CFR 200.430, and any other applicable regulations.

#### **Effective Date:**

This policy is effective as of July 8, 2024 and applies to all incentive payments awarded from this date forward.

#### ***Attachment A: NEIWDB – Board Staff Incentive Payment Approval***

Attachment A:

**NEIWDB – Board Staff Incentive Payment Approval**

I, \_\_\_\_\_ Board Chair Name \_\_\_\_\_, hereby approve the incentive payments for the following NEIWDB staff members:

Name:	Title:	Amount:

This performance incentive payment has been recommended based on performance criteria established in accordance with the Northeast Iowa LWDB Incentive Payment Policy. I confirm that the recommendation aligns with the Northeast Iowa LWDB’s objectives and is consistent with available funds.

The performance incentive for the above individuals was approved by the Executive Committee meeting on \_\_\_\_\_. A copy of the draft minutes of the approval is attached.

Board Chair’s Signature:	Date:

By signing above, the Board Chair acknowledges their approval of the incentive payment for the specified Northeast Iowa LWDB staff member(s). This form will be kept on file as part of the documentation for the incentive payment approval process. Other justifying documentation will be on file as well.

## LANGUAGE ACCESS POLICY (LAP)

10/31/2024

### PURPOSE

This policy provides guidance and establishes the procedures regarding the prohibition against national origin discrimination as it affects persons with Limited English Proficiency (LEP). This policy applies to the Northeast Iowa Local Workforce Development Board (NEIWDB) and other Workforce Innovation and Opportunity Act (WIOA) Title I subrecipients. This policy is effective immediately.

Attachment I of this policy contains the Northeast Iowa Local Workforce Development Board's (NEIWDB) Limited English Proficiency (LEP) Plan.

### BACKGROUND

The nondiscrimination and equal opportunity provisions found in Section 188 of WIOA and 29 CFR Part 38 prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status and gender identity), national origin (including LEP)), age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title I-financially assisted program or activity.

### POLICY AND PROCEDURES

National origin discrimination now includes LEP under 29 CFR Section 38.9 and specifically states that in providing any aid, benefit, service, or training under a WIOA Title I-financially assisted program or activity, a recipient must not, directly or through contractual, licensing, or other arrangements, discriminate on the basis of national origin, including LEP. Additionally, 29 CFR Section 38.41 added "LEP and preferred language" to the list of categories of information that each recipient must record about each applicant, registrant, eligible applicant/registant, participant, and terminee.

### DEFINITIONS

For the purposes of this policy, the following definitions apply:

***Babel Notice*** – a short notice included in a document or electronic medium (e.g. website, "app," email) in multiple languages informing the reader that the communication contains vital information and explaining how to access language services to have the contents of the communication provided in other languages (29 CFR Section 38.4(i)).

**Employment-Related Training** – training that allow or enables an individual to obtain skills, abilities and/or knowledge that are designed to lead to employment (29 CFR Section 38.4(t)).

**LEP Individual** – an individual whose primary language for communication is not English and who has a limited ability to read, speak, write, and/or understand English. A LEP individual may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing) (29 CFR Section 38.4(hh)).

**LEP Plan** – a written language access plan which assists in ensuring that LEP individuals have meaningful access to WIOA Title I-financially assisted programs and activities (29 CFR Section 38.9 Appendix).

**Meaningful Access** – language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

**Primary Language** – an individual’s primary language is the language in which an individual most effectively communicates, as identified by the individual.

#### **Reasonable Steps to Ensure Meaningful Access for LEP Individuals:**

Subrecipients are required to take reasonable steps to ensure that LEP individuals have meaningful access their programs and activities. Reasonable steps may include, but are not limited to, the following:

- Conducting an assessment of a LEP individual to determine their language assistance needs.
- Providing oral interpretation or written translation of both hard-copy and electronic materials, in the appropriate non-English, to LEP individuals.
- Conducting outreach to LEP communities to improve service delivery in needed languages.

(29 CFR Section 38.9(b)(1))

Reasonable steps for providing meaningful access to training programs may include, but are not limited to the following:

- Written training materials in appropriate non-English languages by written translation, or by oral interpretation, or summarization.
- Oral training content in appropriate non-English languages through in-person or telephone translation.

(29 CFR Section 38.9 (b)(2)(i)(ii))

Furthermore, subrecipients should ensure that every program delivery program, whether it be in person, electronic, or by phone, conveys in the appropriate language how a LEP individual may effectively learn about, participate in, and/or access any aid, benefit, service, or training available to them. It should also be noted that as new methods for the delivery of information or assistance are developed, subrecipients are required to take reasonable steps to ensure that LEP individuals remain able to learn about, participate in, and/or access any aid, benefit, service, or training available to them (29 CFR Section 38.9(c)).

### **Language Assistance Services:**

Language assistance generally comes in two forms: oral interpretation or written translation. The NEIWDB will ensure that above all, these services are free of charge and provided in a timely manner. A LEP individual must be given adequate notice about the existence of interpretation and translation services and that they are available free of charge. Language assistance will be considered timely when it is provided at a place and time that ensures equal access and avoids the delay or denial of any aid, benefit, service, or training (29 CFR Section 38.9(d) and (e)).

### **Interpreter Services:**

LEP individuals are not required to provide their own interpreter. Furthermore, there shall be no expectation that the LEP individual will provide their own interpreter, including their minor child or adult family or friend to interpret or facilitate communication, except for the following circumstances:

- In emergency situations while awaiting a qualified interpreter.
- When the information conveyed is of minimal importance to the services to be provided.
- When a LEP individual specifically requests that an accompanying adult provide language assistance, and they agree to provide assistance to the individual. If a subrecipient permits an accompanying adult to serve as an interpreter for a LEP individual, it must make and retain a record of the LEP individual's decision to use their own interpreter.

Finally, where precise, complete, and accurate interpretations or translation of information and/or testimony are critical for adjudicatory or legal reasons, subrecipients can still provide their own, independent interpreter, even if a LEP individual wants to use their own interpreter as well. This also applies in cases where the competency of the interpreter requested by the LEP individual is not established.

(29 CFR Section 38.9(f))

Center staff will provide adequate notice to LEP individuals of the existence of interpretation and translation services and that these language assistance services are available free of charge.



A language identification document is located at each One-Stop Center reception area for LEP customers to identify their language. For LEP individuals, the One-Stop Center will offer assistance through the State contracted services of Language Link. Local staff/partners have access to the service via a toll-free number.

### **Concerning Vital Information:**

For languages spoken by a significant portion of the population eligible to be served or likely to be encountered, subrecipients must translate vital information in written materials into these languages. These translators must in turn be readily available upon request in hard copy or electronically. Written training materials offered or used within employment-related training programs (see definitions section) are excluded from these translation requirements. However, in all cases, subrecipients must take reasonable steps to ensure meaningful access for LEP individuals.

For languages not spoken by a significant portion of the population eligible to be served or likely to be encountered, subrecipients must take reasonable steps to meet the particularized language needs of LEP individuals who seek to learn about, participate in, and/or access the aid, benefit, service or training that is available to them. Vital information may be conveyed orally if not translated.

Center staff must include a “Babel notice,” indicating in appropriate languages that language assistance is available in all communications of vital information. Examples of documents containing vital information include, but are not limited to

- applications;
- consent and complaint forms;
- notices of rights and responsibilities;
- notices advising LEP individuals of their rights under this part, including the availability of free language assistance;
- rulebooks;
- written tests that do not assess English language competency, but rather assess competency for a particular license, job, or skill for which English proficiency is not required; and,
- letters or notices that require a response from the beneficiary or applicant, participant, or employee.

(29 CFR Section 38.9(g))

Finally, to the extent otherwise required by 29 CFR Part 38, once a recipient becomes aware of the non-English preferred language of a LEP beneficiary, participant, or applicant for aid, benefit, service or training, the recipient must convey vital information in that language.

(29 CFR Section 38.9(h))

### **Referrals:**

One-Stop Center staff are encouraged to make referrals to Adult Education and Literacy programs for customers wishing to advance their English proficiency.

### **Outreach and Inclusion:**

In an effort to broaden the composition pool of individuals considered for participation in programs and activities and to ensure the NEIWDB provides outreach to all populations and identified target populations, the NEIWDB utilizes its local demographic information. The demographic information (race, ethnicity, gender, age, and English-proficiency) is compared to data that represents demographic information for the individuals we are serving. This locally specific information is used for planning efforts and to develop services in accordance with specific local population growth. The data is analyzed periodically to ensure the local area is serving the populations it represents by the core partner leadership team.

The Equal Opportunity Officer, alongside the One-Stop Operator and Core and Required Partners will develop outreach plans based on multiple resources including, but not limited to, feedback from Center staff, comments and concerns from customers/participants, and results of the Equal Opportunity Officer's data analysis. The Center's core partner leadership team is responsible for implementing the outreach plan within their centers. The local Equal Opportunity Officer and One-Stop Operator will assist and follow up with each Center to ensure the outreach plan is being followed.

### **Written LEP Plan:**

In order to ensure that reasonable steps are taken to allow meaningful access for LEP individuals, the NEIWDB has developed a written LEP plan (Attachment I).

For additional information on best practices and resources for serving individuals with substantial cultural and language barriers to employment, subrecipients are encouraged to review DOL TEN 28-16, *"Best Practices, Partnership Models, and Resources Available for Serving English Language Learners, Immigrants, Refugees, and New Americans."*

### **Annual Evaluation:**

The local Equal Opportunity Officer or designee, in partnership with the One-Stop Operator and appropriate Core and Required Partners will conduct an annual review of the LEP Plan implementation, including the language access needs of our customer populations. A review of procedures to ensure compliance with this plan and identify any areas where policies, processes,

and procedures can be improved as it relates to providing LEP individuals meaningful and equitable access to programs and services. The NEIWDB will assess the efficacy of the plan, including, but not limited to, the resources and equipment used for the delivery of language assistance, complaints filed by LEP persons, etc. The NEIWDB will update and monitor the implementation of this plan, as necessary.

---

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN (ATTACHMENT 1)

5/17/2023, 10/31/2024

### A. Summary

Individuals who do not speak English as their primary language and who have limited ability to read, write, speak, or understand English may incur a barrier to employment and are entitled to language assistance in their effort to enter the workforce. The quality and accuracy of the language is critical to these efforts and shall be provided in a timely manner to ensure maximum access to services.

This plan provides individuals with Limited English Proficiency (LEP) access to programs and services provided by American Jobs Centers (“AJCs”, or IowaWORKS Centers) and the Northeast Iowa Local Workforce Development Board (“NEIWDB”), on an equitable basis. This plan is applicable to all subrecipients of the LWDB that receive Federal financial funds. This plan reflects the LEP needs of Workforce Innovation and Opportunity Act (WIOA) operations in all local offices.

### B. Overview

1. The Northeast Iowa Local Workforce Development Board and its providers will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and equal opportunity to participate in workforce development programs, activities, information, and other benefits regardless of their ability to speak, read, write, or understand English. The Northeast Iowa Local Workforce Development Board’s plan will ensure meaningful communication with LEP individuals involving their workforce development needs and services. This plan provides for the communication of information contained in vital documents (e.g. program application, rights and responsibilities, etc.) All interpreters, translators, and other aid needed to comply with this plan shall be provided without cost to the person being served, and the individual will be informed of the availability of such assistance free of charge.
2. The Northeast Iowa Local Workforce Development Board will conduct a review of the language access needs of its customer populations and update and monitor the LEP Plan every year. The Local Workforce Development Board Equal Opportunity Officer will oversee the implementation of the LEP Plan.

### **C. Purpose**

1. The purpose of this plan is to establish and affirm the full commitment of the Northeast Iowa Local Workforce Development Board (NEIWDB) to ensure customers, regardless of their national origin or language barriers, shall receive, free of charge, the language assistance necessary to afford them meaningful access to the programs, services, activities, and information of the One-Stop Centers 29 CFR 37.35. This plan provides the framework to ensure Limited English Proficiency (LEP) individuals will be provided meaningful and equitable access to all workforce development programs and services offered through the Northeast Iowa Local Workforce Development Area (NEIWDB) and each of the One-Stop Centers.
2. This plan does not create new services, but instead eliminates or reduces, to the maximum extent practicable, LEP as a barrier to accessing existing information, programs and activities.

### **D. Scope**

1. The NEIWDB shall be responsible for identifying major concentrations of ethnic groups with Limited English Proficiency; staff training needs; inventorying and identifying language assistance aids such as posters, handbooks, forms, handouts, etc.; and developing other language assistance aids to assist with service delivery.
2. The NEIWDB LEP Plan shall be reviewed and updated on an annual basis except for any major changes in demographics, types of services, program changes, or other factors affecting a specific geographic location. Should any of these changes occur, an immediate review of the situation, and plan update will be completed. The annual review, as well as any necessary modifications, will be conducted by the NEIWDB.
3. The WIOA funds will be used to support procurement of language assistance materials and to support costs associated with group language assistance training. Individual clients who require language assistance training and are eligible for WIOA programs and services may be funded from the specific program area funds (Adult, Dislocated Worker, and Youth).
4. The goal of this plan is to function as a tool used to assess the effectiveness of the NEIWDB's service delivery to LEP individuals.

### **E. Application**

1. The Northeast Iowa Local Workforce Development Board will provide a variety of communication options to ensure that individuals with limited English proficiency (LEP) will be effectively informed about and/or able to participate in the workforce development programs, activities, services and information in the Northeast Iowa Local Area. This will entail the provision of competent and confidential language interpretation services and the provision of written materials translated into languages other than English, as needed.

2. In order to comply with the Code of Federal Regulations (CFR), specifically as it relates to Part 38.9 “Discrimination prohibited based on national origin, including limited English proficiency”, the NEIWDB has established this LEP Plan to ensure no individual is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination due to any of the following:
  - a. they (or their families or ancestors) are from a particular county or part of the world,
  - b. their ethnicity or accent (including physical, linguistic, and cultural characteristics), or
  - c. a perception that the individual is of a certain national origin.

#### **F. Requirements**

1. LEP individuals are those individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.
2. Center staff must take reasonable steps to ensure meaningful access to each LEP individual served or encountered so that LEP individuals are effectively informed about and/or able to participate in the program or activity.
  - a. Reasonable steps to provide meaningful access to training programs may include, but are not limited to, providing:
    - i. Written training materials in appropriate non-English languages by written translation or by oral interpretation or summarization; and
    - ii. Oral training content in appropriate non-English languages through in-person interpretation or
    - iii. telephone interpretation.
3. For languages spoken by a significant number or portion of the population eligible to be served, or likely to be encountered, the One-Stop Center must have available translation of vital information in written materials into these languages and make the translations readily available in hard copy, upon request, or electronically such as on a website.
  - a. Vital information is defined as information whether written, oral or electronic, that is necessary for an individual to understand how to obtain any aid, benefit, service, and/or training; necessary for an individual to obtain any aid, benefit, service, and/or training; or required by law. 29 CFR 38.9 (g).
4. In order to full fill the requirements in this section, the NEIWDB has established the following local LEP Plan.

## LEP Plan

### Administration of Plan

1. Disability Access Committee (DAC). The NEIWDB has a Disability Access Committee (DAC) to support efforts that ensure quality access for all individuals. The Disability Access Committee (DAC) will ensure that all staff are trained on all aspects of LEP individual Center access and support.
2. One Stop Operator (OSO). The NEIWDB has a One Stop Operator (OSO) whose responsibility is to coordinate service delivery in a way that supports compliance with this LEP individual plan.
3. Equal Opportunity (EO) Officer. The NEIWDB Equal Opportunity (EO) Officer monitors and evaluates compliance with equal opportunity laws, guidelines, and policies. As such, any complaints or areas of non-compliance found related to equal opportunity requirements and this policy/plan will be submitted to, reviewed, and addressed by either the local EO Officer, or, in their absence, the designated state EO Officer.

### The Four Factor Analysis

Recipients of federal funding, including subrecipients, are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the DOL has stated that the starting point is an individualized assessment that balances the following four factors:

#### ***Factor 1: The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Population***

The U.S. Census Bureau has a range of four classifications of how well people speak English. The classifications are (1) 'Very Well,' (2) 'Well,' (3) 'Not Well,' and (4) 'Not At All.' For planning and statistical purposes, we are considering individuals who speak English at any level below "Very Well" as Limited English Proficient (LEP).

As part of this planning process, we have included statistics from the U.S. Census Bureau 2022 American Community Survey 5-Year Estimates Table to illustrate the number of individuals living in the program area who speak English less than "Very Well." In addition, this U.S. Census survey indicates the number of individuals in each language group among the total population of individuals who speak English less than "Very Well." These statistics help to identify prominent and/or growing language groups for planning purposes at a Local Workforce Development Area (LWDA) level.

#### ***Factor 2: The Frequency with Which LEP Individuals Come in Contact With the Program***

The program must be evaluated in relationship to the number of LEP persons who are within the program area and the number of times those persons have frequented the program or activity. The NEIWDB utilizes IowaWORKS, the State of Iowa's public labor exchange system, to provide information to job seekers, to register program applicants and participants, and to list available jobs. User statistics have been pulled from IowaWORKS Registered Individuals, which indicate voluntary self-identification information, which may help to indicate a potential need for language assistance among individuals.

***Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient***

The NIEWDB provides a wide range of programs, activities and services. The NEIWDB provides Veterans Services, Job Seeker Services, Business Services, and a multitude of other services. The NEIWDB is responsible for administering numerous programs that receive Federal funding, including: WIOA, Veterans, Rapid Response, and many other programs receiving Federal funding or grants.

***Factor 4: The Resources Available to the Recipient and Costs***

The NEIWDB serves the Northeast Iowa Local Area and is required by Federal law to provide access to LEP persons, and to ensure that its subrecipients also provide such access. Currently, internet sites can be utilized to translate some materials. Additionally, local staff have been identified to provide some oral translation and all IowaWORKS Centers have access to Language Link translation service by telephone.

Furthermore, many of the common forms are available in English and Spanish at IowaWORKS Centers, with some other languages also available as necessary. Additionally, translation activities are an eligible administrative expense. Therefore, limited LEP measures are reasonable given the resources available to the NEIWDB.

**Identifying Individuals with Limited English Proficiency**

To achieve equal access to all programs offered by the NEIWDB, it is essential to conduct a thorough assessment of the language needs of the populations served by attempting to identify LEP individuals. In order to identify language needs, the NEIWDB has reviewed available language data from the U.S. Census American Community Survey.

Number and Percent of People Who Speak English Less Than "Very Well" by Language or Language Group in the NEIWDA

Language/Language Group	Number of Individuals Who Speak English Less than "Very Well"	Percent of Individuals Who Speak English Less than "Very Well"
Spanish	4239	.87%
French, Haitian or Cajun	38	Below 0%
German or other West Germanic languages	754	Below 0%
Russian, Polish or other Slavic languages	1428	Below 0%
Other Indo-European languages	335	Below 0%
Korean	62	Below 0%
Chinese (incl. Mandarin, Cantonese)	223	Below 0%
Vietnamese	166	Below 0%
Tagalog (incl. Filipino)	360	Below 0%
Other Asian and Pacific Island Languages	1500	Below 0%
Arabic	72	Below 0%
Other and unspecified languages	329	Below 0%
<b>LWDA Total:</b>	<b>9506</b>	<b>.02%</b>

Source: US Census Bureau, 2022 American Community Survey, 5-Year Estimates out of 489,242 population

1. Spanish Speakers: The largest group of individuals who speak English less than "very well" are Spanish speakers, with 4,239 individuals making up 0.87% of the total population in the NEIWD. This indicates a significant need for resources and services tailored to Spanish-speaking communities.
2. German or Other West Germanic Languages: There are 754 individuals who speak German or other West Germanic languages less than "very well," but this represents a very small fraction of the total population.
3. Russian, Polish, or Other Slavic Languages: With 1,428 individuals in this category, these speakers are a notable group within the population that may also benefit from language support services.
4. Other Asian and Pacific Island Languages: This group has 1,500 individuals, suggesting a diverse range of languages within this category, requiring language accessibility resources.
5. Other Languages: Many other language groups, such as Tagalog, Vietnamese, and Arabic, have relatively smaller populations that speak English less than "very well," but they still represent an important part of the region's diversity.
6. Overall Total: The total number of people in the Northeast Iowa local area who speak English less than "very well" is 9,506, which constitutes about 0.02% of the overall population. This shows that while the percentage might seem small, these individuals collectively represent a significant number of people needing language assistance.

This data suggests that the local area has a diverse population with multiple language needs.



## Operational Guidelines for Language Assistance Services

### 1. Identifying LEP Individuals

At the point of first contact with an LEP individual, staff should make reasonable efforts to conduct or arrange for an initial assessment of the need for language assistance services and make reasonable efforts to obtain such services if they are needed to effectively communicate with the individual.

Staff can determine whether a person needs language assistance in several ways:

- Inquiring if the individual identifies him/herself as a non-English speaker, LEP individual, or companion thereof;
- Inquiring as to the primary language of the individual who identified him/herself as needing language assistance services;
- Asking a multilingual staff or qualified interpreter to verify an individual's primary language;
- Observing the individual's use of an "I speak ... [language]" identification card or poster.

### 2. Oral Language Interpretation

Staff will assist LEP persons in face-to-face and telephone encounters with oral interpretations from qualified interpreters or employees. At the point of first contact, the employee will determine whether the person is LEP by determining the primary language and implement or procure the appropriate language assistance. Staff may identify an individual's primary language using the following:

- "I speak ... [language]" identification cards.
- Displaying language identification posters within work units that typically serve LEP persons.
- Verifying foreign language proficiency by using a qualified interpreter (in person, telephonically, or through video interpretation services).
- Written translations of vital printed documents in relevant languages such as application procedures or training documentation.

Strictly limit and do not encourage the use of friends or family as interpreters. Permit such use only after meeting all of the following conditions:

- The LEP person declines the right to free interpreter services and requests the use of a family member or friend;
- When the information conveyed is of minimal importance to the services to be provided;
- The use of such a person will not compromise the effectiveness of services or violate the LEP person's confidentiality; and
- The LEP person's file documents the offer and declination of free interpreter services. If a LEP person elects to use a friend or family member as an

interpreter, LWDB suggests that an alternate interpreter sit in on the encounter to ensure the accuracy of the interpretation.

### **3. Translation of Written Materials**

Translation of written material is the replacement of written text from one language (source language) into equivalent written text in another language (target language).

- Written materials may include but are not limited to: letters containing important information regarding participation in programs; notices pertaining to the granting or denial of benefits; notices of appeal rights; notices that require responses from beneficiaries; notices advising LEP individuals of the availability of free language assistance; and other outreach materials. Translation may include all or part of a document.
- It will be determined, on a case-by-case basis, the extent of the obligation to provide translated documents. Consider translating any document or information if it contains critical information for accessing WIOA programs, services, benefits or is required by law.
- The individual translating materials must be appropriately qualified and the translations accurately convey the required information. For example, some verbatim translations may not accurately convey the substance contained in the original written materials.
- To determine the resources available to provide language assistance to LEP persons and the costs associated with those resources, the LWDB and subrecipients shall explore the most cost-effective means of delivering competent and accurate language services. This exploration includes determining costs associated with translating documents, contracting interpreters, and securing other language assistance methods as needed in addition to using subrecipient staff who can assist customers in specific languages.

### **4. Local Office Language Assistance Measures**

Language assistance services are available throughout the Northeast Iowa local area for many languages. Brochures, signage, and complaint forms are required to be available in multiple languages in all offices throughout the Northeast Iowa local area. The NEIWDB maintains ongoing efforts to create and provide translation of Equal Employment Opportunity (EEO) brochures, posters, and customer materials.

Assistance may include interpreters, translated versions of documents/information, referral to English as a Second Language courses, or other appropriate services, which will enable the individual to enter the workforce.

Specific language assistance available at each Iowa **WORKS** location in the Northeast Iowa local area as follows:

Name of Facility	Address	Non-English Languages Spoken by Staff
Decorah Iowa <b>WORKS</b>	312 Winnebago St, Decorah	None
Dubuque Iowa <b>WORKS</b>	680 Main St, 2 <sup>nd</sup> Floor, Dubuque	Spanish, Russian
Mason City Iowa <b>WORKS</b>	600 South Pierce Ave, Mason City	Spanish
Waterloo Iowa <b>WORKS</b>	3420 University Ave, Waterloo	Spanish, Bosnian, Serbian, Croation

## 5. Interpreter Limitations

1. LEP individuals are not required to provide their own interpreter and there should be no expectation on the part of the service provider(s) at the Center that the LEP individual will provide their own interpreter, this includes the LEP individual's minor child or adult family or friend(s).
  - a. An LEP individual's minor child or adult family or friend(s) may interpret or facilitate communication in emergency situations while awaiting a qualified interpreter; or
  - b. An accompanying adult (but not minor child) may interpret or facilitate communication when:
    - i. the information conveyed is of minimal importance to the services,
    - ii. the LEP individual specifically requests that the accompanying adult provide language assistance,
    - iii. the accompanying adult agrees to provide assistance, and
    - iv. reliance on that adult for such assistance is appropriate under the circumstances.
2. When the accompanying adult is permitted to provide such assistance, Center staff must make and retain a record of the LEP individual's decision to use their own interpreter.
3. Local Procedure:
  - a. Center staff will provide adequate notice to LEP individuals of the existence of interpretation and translation services and that these language assistance services are available free of charge.
  - b. A language identification flashcard is located at each Center reception area for LEP customers to identify their language. For LEP individuals, the Center will offer assistance through the State contracted services of Language Link. Local staff have access to the service via a toll-free number.

## Access to Vital Information

1. **IowaWORKS:** IowaWORKS is the labor exchange, case management and reporting site for the LWDB programs. IowaWORKS is available in English and Spanish. IowaWORKS is accessible at <https://www.iowaworks.gov>.
2. **Northeast Iowa Workforce Development Board Website:** The NEIWDB public website provides information for workers and employers. This includes information about job searching, training, the WIOA, and many additional programs and services. At this time, the only available language for the NEIWDB site is English. The NEIWDB site is accessible at [neiaworkforce.org](http://neiaworkforce.org).
3. **Social Media:** The NEIWDB may utilize multiple social media platforms in order to improve and increase its public outreach. At this time, all information published to social media platforms is published exclusively in English.
4. **Rapid Response:** Rapid Response provides assistance to workers who are dislocated due to plant closures and substantial layoffs and is a required activity under WIOA. Rapid Response meetings provide information to dislocated workers about AJC services, WIOA training activities, Trade Adjustment Assistance, Unemployment Insurance benefits, LMI, financial counseling, Federal financial assistance, and many other job-seeker services and programs. Rapid Response staff work with the employer to determine if language assistance is needed for meetings. In some cases, the employer is able to provide oral translation services.
5. Center staff must include a “Babel notice,” indicating in appropriate languages that language assistance is available in all communications of vital information.
6. Examples of documents containing vital information include, but are not limited to:
  - a. applications;
  - b. consent and complaint forms;
  - c. notices of rights and responsibilities;
  - d. notices advising LEP individuals of their rights under this part, including the availability of free language assistance;
  - e. rulebooks;
  - f. written tests that do not assess English language competency, but rather assess competency for a particular license, job, or skill, for which English proficiency is not required;
  - g. and letters or notices that require from the beneficiary or applicant, participant, or employee.

## Referrals

1. Center staff are encouraged to make referrals to Adult Education and Literacy programs for customers wishing to advance their English proficiency.

## Inclusion Efforts

1. In an effort to broaden the composition pool of individuals considered for participation in programs and activities and to ensure the Northeast Iowa Local

Workforce Development Area provides outreach to all populations and identified target populations, the NEIWDB utilizes its local demographic information.

2. The demographic information (race, ethnicity, gender, age, and English-proficiency) is compared to data that represents demographic information for the individuals we are serving.
3. This locally specific information is used for planning efforts and to develop services in accordance with specific local population growth.
4. The data is analyzed periodically to ensure the local area is serving the populations it represents by the core partner leadership team.

## **Outreach**

1. The local Equal Opportunity Officer or designee will develop outreach plans based on multiple resources including, but not limited to, feedback from Center staff, comments and concerns from customers/participants, and results of the Equal Opportunity Officer's data analysis.
2. The Center's core partner leadership team is responsible for implementing the outreach plan within their centers. The local Equal Opportunity Officer will assist and follow up with each Center to ensure the outreach plan is being followed.

## **Training and Annual Evaluation**

1. Training on serving individuals with LEP needs shall be conducted by the NEIWDB and subrecipients for their staff. Each local Equal Opportunity (EO) Officer or designee will coordinate, schedule and implement training. LEP training shall be conducted every year, with the training materials and topics being coordinated with the EO Officer or designee. Subrecipients shall ensure that new and existing staff members periodically receive training. Additional training sessions may be conducted alerting staff to any major changes necessitating alterations to the LEP plan that would directly influence daily activities. Likewise, training materials and tools are shared with staff through meetings and emails as the LWDB or the subrecipient becomes aware of them. Some of these items include, but are not limited to, resources such as: "I Speak Cards", free website translations services, Federal initiatives and tools, and U.S. Census data.
2. The content, details and topics of training will be determined based upon needs, recommendations by staff and by the EO officer, as well as budget constraints. Training may include but is not limited to:
  - Identifying the language needs of LEP individuals;
  - Working with interpreters in-person or on the telephone;
  - Requesting documents for translation;
  - Accessing and providing language assistance services through multilingual employees, inhouse interpreters and translators or contracted personnel;
  - Professional responsibility with respect to LEP individuals;
  - Interpreter ethics;

- Tracking the use of language assistance services; and
  - Tips on providing effective assistance to LEP individuals.
3. The LWDB strives to hire qualified candidates who possess bilingual skills in order to ensure access to services for LEP customers.
  4. The local Equal Opportunity Officer or designee, in partnership with the One-Stop Operator and appropriate Core and Required Partners will conduct a review of the LEP Plan implementation, including the language access needs of our customer populations. A review of procedures to ensure compliance with this plan and identify any areas where policies, processes, and procedures can be improved as it relates to providing LEP individuals meaningful and equitable access to programs and services.
  5. The Northeast Iowa Local Workforce Development Board will assess the efficacy of the plan, including, but not limited to, the resources and equipment used for the delivery of language assistance, complaints filed by LEP persons, etc. The Northeast Iowa Local Workforce Development Board will update and monitor the implementation of this plan, as necessary.

## Quality Control

1. Ensuring the quality and accuracy of language assistance services provided by the NEIWDB is critical to providing LEP individuals with meaningful access to programs and activities. IowaWORKS Centers should take reasonable steps to ensure that all staff who serve as translators, interpreters or who communicate “in-language” with LEP persons are competent to do so. Factors indicating competency may include:
  - Demonstrated proficiency in communicating information accurately in both English and the other language;
  - Identifying and employing the appropriate mode of interpreting (e.g., consecutive, simultaneous, or sight translation), translating, or communicating fluently in the target language;
  - Knowledge in both languages of any specialized terms or concepts particular to the component’s program or activity and of any particular vocabulary used by the LEP person;
  - Understanding and following confidentiality, impartiality and ethical rules;
  - Understanding and adhering to the role as interpreter, translator or multilingual individual.
2. Efforts to gain feedback from the recipients of these services are critical. Instituting an on-line survey after receiving services can assist in assessing quality, the improvement, and the professionalism of the delivery of the interpreters/translators.
3. Further, subrecipient staff should always record language needs in the files of LEP customers future use and as formal recording of their language needs.

## Compliance and Enforcement

1. The NEIWDB is responsible for ensuring subrecipient compliance with the LEP Plan. The NEIWDB will assess annually whether a subrecipient’s procedures allow LEP persons to

overcome language barriers and participate in a meaningful way in programs, services, and benefits. Prohibited practices include:

- Providing services to LEP persons that are more limited in scope, not as effective or lower in quality, than those provided to other persons who are proficient in English;
- Subjecting LEP persons to unreasonable delays in the delivery of services;
- Limiting participation in a program or activity on the basis of English proficiency;
- Failing to inform LEP persons of the right to receive free interpreter services and/or requiring LEP persons to provide their own interpreters.

### **Dissemination Of NEIWDB's LEP Plan**

The NEIWDB's LEP Plan may be accessed at [neiaworkforce.org](http://neiaworkforce.org).

### **LEP Complaint Procedures**

If you think you have been subjected to discrimination involving LEP, Title VI, and related statutes please contact the NEIWDB at [erika@northeastiawdb.org](mailto:erika@northeastiawdb.org).

## **LOCAL MONITORING AND OVERSIGHT**

### **Purpose:**

The purpose of this policy is to provide guidance and establish the Northeast Iowa Workforce Development Board's (NEIWDB) standards regarding local oversight and monitoring of Workforce Innovation and Opportunity Act (WIOA) Title I programs, including Adult, Dislocated Worker and Youth. With guidance in accordance with Iowa Workforce Development ePolicy, this policy is intended to ensure that NEIWDB and its designated Fiscal Agent, One-Stop Operator and WIOA Title I Service Provider operate programs and provide integrated service delivery efficiently and effectively in compliance with all applicable laws, regulations, uniform administrative requirements, and State and locally established policies.

### **Oversight Process:**

The roles and functions of the LWDB, Board staff, and fiscal agents in their oversight and monitoring processes. Monitoring and oversight will be conducted to measure compliance with WIOA regulations and policies. Monitoring will include a comprehensive examination of compliance issues cited in prior reviews and the determination of corrective measures taken to address and resolve those issues.

The Northeast Iowa Local Workforce Development Board and the Chief Elected Officials (CEOs) are responsible, in partnership, for oversight of all programs as the designated grantee. A monitoring report will be submitted annually to the Northeast Iowa Local Workforce

Development Board and CEOs for review and possible actions. All problems must be resolved by prompt and appropriate corrective action (20 CFR 683.420(a)).

The entity, and the title of the individual, who shall be responsible for monitoring each program activity. The Northeast Iowa Local Workforce Development Board Executive Director and/or board support members will coordinate and/or execute monitoring of the contracted service providers, the one-stop operator and United States Department of Labor funded programs in the local area.

Through the LWDB staff, the board will conduct on-site reviews of policies, plans, and procedures governing all segments of program activities and operations at least once during the program year. Monitoring activities will analyze compliance with federal, state, and local administrative and financial requirements, policies, and procedures, and measure the performance goals for level of achievement. Monitoring activities may be conducted by independent entities to avoid any potential conflict of interest

#### Responsible Representatives

- The board executive director and board staff will perform the programmatic monitoring of the subrecipients, or designee, along with oversight of the fiscal agent.
- The fiscal agent staff will be responsible for the oversight and monitoring of the service provider fiscal operations.

Oversight may include, but is not limited to:

- Administration and Governance
- Workforce Development Program Delivery
- Fiscal Management
- Performance and Reporting Management
- Additional review areas, as applicable

Reports will be provided to the members of the NEIWDB and to the entity monitored.

A random sample of at least 10% of participant files will be reviewed to determine compliance with required federal, state, and local laws, policies, plans and procedures.

Full file and/or desktop reviews and monitoring documents will be utilized throughout the program year to allow reviewers and contractors flexibility in methodology to ensure a continuous improvement process can be maintained while providing technical assistance and training in a timely manner. Monitoring shall be conducted at least once during the program year.

A pre-award financial review or on-site post-award monitoring of contract service providers shall be conducted no later than 120 calendar days after the award of the contract. Pre-award financial reviews and on-site post-award monitoring of contract service providers shall be conducted according to state policy.



A variety of monitoring methods will be utilized. These may include questionnaires and/or interviews with customers, employers, One-Stop Operator, and Job Center staff. Monitoring reviews may include on-site visits to subsidized employer worksites as required, desktop reviews, as well as hard copy file reviews of participant and employer records. This will include comprehensive examination of compliance issues cited in prior federal, state, and local reviews.

Written monitoring reports shall be provided to the contractor after the completion of the review. As required by WIOA, when problems are identified, prompt and appropriate corrective action will be taken. A corrective action plan will be put in place and monitored by the board and/or board support on a regular basis to ensure that no further technical assistance is required.

### **Oversight Methods:**

NEIWDB may utilize any of the following methods of monitoring oversight:

- Random sampling
- Risk assessment
- Desk review
- On-site visit
- Questionnaires and interviews of customers, employers, One-Stop Operators
- Customer satisfaction survey
- Other necessary methods, as applicable

The NEIWDB will submit the annual approved monitoring report and resolutions to IWD for review at the time of issuance. NEIWDB will electronically submit new or updated documents and monitoring reports and resolutions to: [wioagovernance@iwd.iowa.gov](mailto:wioagovernance@iwd.iowa.gov).

All contracts shall be monitored by the **NEIWDB Executive Director** and Board staff and/or fiscal agent for each program, at least annually for all WIOA related grants.

The LWDB monitoring schedule and sample size will be in accordance with federal and state policies. Contractors will be notified of the intended dates and scheduled monitoring at least two weeks prior whenever possible.

The LWDB reserves the right to conduct unscheduled monitoring in conjunction with or in response to investigations of misfeasance and/or malfeasance or previous monitoring findings.

### **Financial Monitoring:**

The entity selected by the Northeast Iowa Chief Elected Officials (CEOs) to serve as the fiscal agent for the Northeast Iowa Local Workforce Development Board is responsible for the following functions:

- Receive funds.

- Ensure sustained fiscal integrity and accountability for expenditures of funds in accordance with the Office of Management and Budget circulars, the Workforce Innovation and Opportunity Act and the corresponding Federal Regulations and State policies.
- Respond to audit financial findings.
- Maintain proper accounting records and adequate documentation.
- Prepare financial reports.
- Provide technical assistance to subrecipients regarding fiscal issues.
- Provide an annual audit report to the LWDB and CEOs.
- Provide documentation to the LWDB, CEOs and executive director to the board as requested.

It shall be the responsibility of the Fiscal Agent to conduct an annual financial monitoring of the NEIWDB contracted WIOA Title I Service Provider and One-Stop Operator. The Fiscal Agent will conduct oversight activities of financial systems, cost limitations and expenditures to ensure that grant funds and other assets are adequately safeguarded, and fund use is in compliance with OMB Circulars, Federal regulations, state and local policy requirements. Such fiscal oversight activities used to determine contract service provider compliance include, but are not limited to the monitoring, evaluation, and auditing of one or more of the following:

General requirement examples:

- a) Administrative procedures
- b) Procurement
- c) Program income and reporting
- d) Property accountability and safeguarding Record retention

Fiscal Controls and Accounting examples:

- a) Audits
- b) Cash disbursement compliance and documentation
- c) Cash management practices
- d) Closeout
- e) Cost allocation plans and processes
- f) Disallowed costs
- g) Financial management systems
- h) Internal controls
- i) Generally Accepted Accounting Principles (GAAP) adherence
- j) Payroll administration
- k) Planning and budget methodologies
- l) Reporting

Oversight examples:

- a) Insurance coverage and risk exposure

- b) Oversight functions
- c) Policies

The Fiscal agent will develop its monitoring process including any tools, scheduling, and resolution processes. The Fiscal Agent will submit a report of fiscal monitoring to the Board including any funds recovered due to disallowed costs. When disallowed costs are found, the service provider is responsible for reimbursing the fiscal agent 100% of costs associated with the participant (service provider staff time not included). During the annual review, the Fiscal Agent will also monitor Service Provider's adherence to their contract. The Fiscal Agent will conduct a 120-day review of new Service Providers, or any Service Provider identified that may have a high risk of potential deficiencies.

The highest-ranking individual of the entity performing the monitoring activities will be responsible for ensuring corrective actions are taken when problems or issues are found. Corrective actions will be resolved within 20 business days, or a date agreed upon by the parties involved. Subsequent monitoring may be conducted, at the direction of the board, as needed to determine if a corrective action has been completed.

#### **Process for Addressing Monitoring Disagreements:**

Should the sub-recipient disagree with any findings from the monitors, the sub-recipient has the right to submit a formal request in writing for a review to the LWDB executive director, along with justification and documentation in support of their request. The executive director will provide a written response within 10 business days of the date the request was submitted. If a satisfactory decision cannot be agreed upon, the sub-recipient has the right to file a grievance with the Executive Committee. The Executive Committee will perform a review of all documentation and ask any clarifying questions and provide the LWDB's final decision on the issue within 20 business days of the sub-recipient's formal request.

### **NON-DISCRIMINATION AND EQUAL OPPORTUNITY**

All Parties of the local area certify that they prohibit, and will continue to prohibit, discrimination, and they certify that no person, otherwise qualified, is denied employment, services, or other benefits on the basis of: (i) political or religious opinion or affiliation, marital status, sexual orientation, gender, gender identification and/or expression, race, color, creed, or national origin; (ii) sex or age, except when age or sex constitutes a bona fide occupational qualification; or (iii) the physical or mental disability of a qualified individual with a disability.

The Parties of the LWDA will comply with Section 188 of the WIOA Nondiscrimination and Equal Opportunity Regulations (29 CFR Part 38; Final Rule December 2, 2016), the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), the Non-traditional Employment for Women Act of 1991, titles VI and VII of the Civil Rights of 1964, as amended, Section 504 of the Rehabilitation Act of 1973, as amended, the Age Discrimination Act of 1967, as amended, title IX of the

Education Amendments of 1972, as amended, and with all applicable requirements imposed by or pursuant to regulations implementing those laws, including but not limited to 29 CFR Part 37 and 38. The Parties agree to fully comply with the Iowa Civil Rights Act of 1965 as amended, Iowa Executive Order 15 (1973), as amended by Iowa Executive Order 1934 (1988).

## PERSONALLY IDENTIFIABLE INFORMATION (PII)

10/27/2022, 6/25/2025

This policy applies to and provides guidance for Northeast Workforce Development Board (NEIWDB) staff, contractor staff, grantees, sub-grantees, partner staff, and staff of any co-located partner in the workforce centers (collectively “Parties”) involved in the handling and protecting of Personally Identifiable Information (“PII”) as a result of WIOA activities in the Northeast Iowa Local Workforce Development Area, including wage and education records, will protect PII in accordance with the law. FERPA (as amended), WIOA, and applicable Departmental regulations will be followed. As well as any governing guidelines including federal law, OMB guidance, United States Department of Labor, Employment and Training Administration policies (see Training and Employment Guidance Letter No. 39-11), as well as any relevant state and local requirements.

As part of its workforce development activities, Parties may have in their possession PII relating to their organization and staff, sub grantee and partner organizations and staff and individual program participants.

This information is generally found in personnel files, participant data sets, performance reports, program evaluations, grant and contract files and other sources. Federal law, OMB guidance, federal, state, and local policies require that PII and other sensitive information be protected. To ensure compliance with these policies/regulations, PII and sensitive data developed, obtained, or otherwise associated with federal and state funding must be secured and protected at all times.

Per the NEIWDB MOU the following apply:

1. The collection, use, and disclosure of customer education records, and the PII contained therein, as defined under FERPA, shall comply with FERPA and applicable State privacy laws.
2. All confidential data contained in the UI wage records must be protected in accordance with the requirements set forth in 20 CFR 603.
3. All personal information contained in VR records must be protected in accordance with the requirements set forth in 34 CFR 361.38.
4. Customer data may be shared with other programs, for those programs’ purposes, within the Iowa**WORKS** Center network only after written consent of the individual has been obtained, where required.
5. Customer data will be kept confidential, consistent with Federal and State privacy laws and regulations.

6. All data exchange activity will be conducted in machine readable format, such as HTML or PDF, for example, and in compliance with Section 508 of the Rehabilitation Act of 1973, as amended. 29 CFR 794(d).

### ***Training and Policies:***

Parties' management shall ensure that all their staff are trained in the use of PII:

1. All staff members located in or affiliated with IowaWORKS centers (co-located partners, grantees, contractors, etc.) must complete the Personally Identifiable Information (PII) training required by Iowa Workforce Development (IWD) upon hire and at least annually thereafter.
2. Parties not physically located at a co-located IowaWORKS center are still required to complete annual PII training, which shall be delivered by NEIWDB. NEIWDB will provide access to the training materials and maintain a log of completed trainings.
3. Each local program representative must sign an acknowledgment form certifying that their staff have received the required annual PII training and are aware of confidentiality expectations. These forms should be maintained in the personnel files of the respective organizations and must be made available upon request by NEIWDB for monitoring purposes.
4. Parties should also maintain internal Standard Operating Procedures (SOPs) to address how they will protect and manage PII in accordance with this policy and all applicable federal and state laws.

### ***Collection of PII***

1. Before collecting PII or sensitive information from participants, parties shall ensure participants sign releases acknowledging the use of PII for program services only.
2. Whenever possible, parties shall use unique identifiers for participant tracking instead of SSNs.
3. While SSNs may initially be required for performance tracking purposes, a unique identifier could be linked to each individual record.
4. Once the SSN is entered for performance tracking, the unique identifier should be used in place of the SSN for tracking purposes.
5. If SSNs must be used for tracking purposes, they must be stored or displayed in a way that is not attributable to a particular individual, such as using a truncated SSN.

### ***Ensure Privacy and Restriction of Use***

1. All Parties must take the steps necessary to ensure the privacy of all PII obtained from participants and/or other individuals and to protect such information from unauthorized disclosure and must ensure that PII used during the performance of their duties has been obtained in conformity with applicable Federal and state laws governing the confidentiality of information.
2. Access to any PII shall be restricted to only those Parties who require it in their official capacity to perform duties in connection with the scope of their services.

### ***Physical and Remote Access***

1. All Parties shall ensure that all PII data obtained through their program services is stored in an area that is physically safe from access by unauthorized persons at all times and is managed with appropriate information technology (IT) services and designated locations.
2. Parties shall store paper documents containing PII in locked cabinets when not in use. All PII data must be processed in a manner that will protect the confidentiality of the records/documents and is designed to prevent unauthorized persons from retrieving such records by computer, remote terminal, or any other means.
3. Data may be downloaded to, or maintained on, mobile or portable devices only if the data are encrypted using NIST validated software products based on FIPS 140-2 encryption. In addition, wage data may only be accessed from secure locations.
4. To ensure that PII is not transmitted to unauthorized users, all PII and other sensitive data transmitted via email or stored on CDs, DVDs, thumb drives, etc., must be encrypted.
5. If special procedures are required to handle PII during the provision of mobile rapid response services, the one-stop operator shall develop and implement procedures to ensure compliance with this policy. The procedure will be reviewed as needed by the one stop operator and LWDB staff.
6. Parties shall never leave records containing PII open and unattended.

### ***Use of Personal Mobile Devices***

1. No employee may access Iowa Workforce Development (IWD) email through a personal mobile device without the approval from IWD and/or the **NEIWDB Executive Director**.
2. If such approval to access the network and/or company email through a personal device is granted, the employee agrees to the following:
  - a. All personal mobile devices must be password protected at all times.
  - b. In order to protect PII, NEIWDB/IWD retains the right to delete data and/or applications from any device that contains company information.

- c. Personal mobile devices will require the installation of various applications, as determined by IWD based on the mobile device.
- 3. Please note that in certain situations a device may be completely wiped in order to ensure that NEIWDB/IWD can protect its interests.
  - a. If given sufficient notice, NEIWDB/IWD can work with the Parties to avoid such action.
  - b. If a Party's device has been compromised, lost, or stolen, such person shall reach out immediately to NEIWDB/IWD.

### ***Retention and Destruction***

All PII data must be retained to satisfy all required record retention requirements. Thereafter, all PII data must be destroyed using appropriate methods for destroying sensitive PII in paper files (i.e., shredding) and securely deleting sensitive electronic PII.

### ***Reporting***

Parties shall immediately report any breach or suspected breach of PII to the NEIWDB/IWD (in the case of electronic data) or to such Party's supervisor (in all other cases).

### ***Related Information***

***TEGL 39-11***

## PII Policy Acknowledgment Form

I have reviewed and acknowledge understanding of the NEIWDB Personally Identifiable Information Policy and agree that all necessary steps will be taken to ensure the privacy and confidential nature of all personally identifiable information (PII) to protect the PII from unauthorized disclosure.

I further agree that all personally identifiable information will be stored in an area that is physically safe from access by unauthorized persons and will be managed with appropriate information technology (IT) services at all times.

All collection and use of any information, systems or records that contain personally identifiable information (PII) will be limited to purposes that support the programs and activities conducted with WIOA funding through the One Stop system in the Northeast Iowa Local Workforce Development Area.

Access to software systems and files under my control containing PII will be limited to use in my responsibilities as an authorized staff person within the system. This includes the safeguarding of computer passwords and access to any/all computer information systems. I will not share my Iowa**WORKS** ID with or allow anyone to use my Iowa**WORKS** access. (Doing so will cause me to forfeit my access). I agree to abide by regulations that govern the access, use and disposal of PII in accordance with WIOA and the NEIWDB.

Printed Name:

Signature:

Agency:

Date:



## POLICY REVISION PROCESS

5/17/2023

### A. Overview

In partnership with the CEOs, it is the responsibility of the Northeast Iowa Local Workforce Development Board (NEIWDB) to set policy for the local workforce system consistent with state policies. As such, it is the responsibility of NEIWDB staff to facilitate the process of policy development in a way that is transparent, compliant with by-laws, inclusive of stakeholders and ensures, to the degree practicable, effective, and efficient oversight of local workforce system activities.

### B. Proposing Revisions

1. A policy revision proposal must:
  - a. Be documented and submitted to NEIWDB staff using the Policy Revision Request Form.
  - b. Must include appropriate data to substantiate the need for the policy change.
2. NEIWDB staff will ensure the Policy Revision Request Form is complete and will coordinate with the appropriate NEIWDB committee so policy revision requests can be added to agenda, reviewed, discussed, and approved for submission to the local board.
3. Consultation from CEOs may be required if a revision impacts board operations.
4. If the appropriate NEIWDB approves revision, it must be submitted for review and approval by either the NEIWDB or Executive Committee (to be determined by whichever body is scheduled to meet next).
5. If there is a suggested “new” policy the Policy Revision Request Form still needs to be completed with appropriate data submitted for the need for the policy addition needs to be attached.

### C. Review and Approval

1. **If Significant Changes Needed.** If the NEIWDB or Executive Committee requests significant changes, or changes that fundamentally alter the purpose or goal of the original policy revision, the request for change as well as justification must be documented and returned to the committee from which the revision request originated to be reviewed, edited, and resubmitted.
2. **No Significant Changes Needed.** After either the NEIWDB or Executive Committee approves of revision, the final approved language will be:
  - a. Finalized within a revised version of the policy using Policy Format Template.
  - b. Added to the Northeast Iowa Local Policies and Procedures document.

- c. Filed in the internal NEIWDB staff policies folder.
- d. Published on the external NEIWDB website.

#### **D. Implementation**

- 1. Communication
  - a. Memos, training, QA sessions may be developed and implemented, arranged, and administered by committee members and/or board staff to increase stakeholder awareness and understanding of policy revision requirements.
- 2. Execution
  - a. The committee must establish a reasonable implementation timeline for policy revision(s), especially those that cause changes to established processes, procedures, forms and/or other practices that impact program administration and providing service(s).

#### **E. Evaluation**

- a. The NEIWDB staff will facilitate policy review every two years. The effective, approved and, the last amended date will be included on each policy in the Northeast Iowa Local Policies and Procedures document.
- b. If state and/or federal policy changes alter local policies those will be reviewed and evaluated to adjust to those modifications.

#### **F. Attachments**

- a. Policy Revision Request Form

**Attachment A:**  
**Policy Revision Request Form**

(Complete and submit to Northeast Iowa Local Workforce Development Board Staff Member)

**Policy Revision Originator Details**

Date Submitted:	
Originator Name:	
Email:	
Phone Number:	

**Policy Revision Details**

Policy Name:	
Policy Type: (Check one)	<input type="checkbox"/> New <input type="checkbox"/> Revision <input type="checkbox"/> Deletion
Statement: (insert a brief statement on why this policy needs revised)	
Suggested Changes:	
Note: If this is a revision, attach a copy of the current policy as well as a tracked changes version to this document.	

## PRIORITY OF SERVICE

Updated 04/03/2023

### ADULT PRIORITY OF SERVICE

#### Background:

WIOA establishes a priority requirement with respect to funds allocated to a local area for adult individualized career services and employment and training activities; there is no priority applied for receipt of basic career services. Funds must give priority to recipients of public assistance, other low-income individuals, individuals who are basic skills deficient, and individuals with barriers to employment. Priority must be implemented regardless of the amount of funds available to provide services in the local area.

#### Definition:

1. **Priority of Service:** Defined as the right of eligible covered persons to take precedence over eligible non-covered persons in obtaining DOL-funded services. It is important to understand that priority of service does not change the intended function of a program or service. Covered persons must meet all statutory eligibility and program requirements for participation in order to receive priority for a program or service.

AJC staff must prioritize services to these populations at all times, regardless of the amount of funds available to provide services in the local area.

- a) These priorities are in addition to the requirements in the WIOA regulations at 20 CFR 680.650 that veteran and their eligible spouses receive priority of service for all Department of Labor (DOL)-funded job training programs, including the WIOA Adult program.
- b) A veteran must meet each program's eligibility criteria to receive services under the respective employment and training program.

Adult Title I clients receive priority of service based upon need. Priority should be given to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient. Services are to be provided to those who can benefit from and who are most in need of such opportunities. The Northeast Iowa LWDA gives priority to individuals who fit one of the three priority populations below. Additional priority groups are listed below who may be enrolled by approval from the **Executive Committee**. Acceptable documentation for verifying priority of service is provided in **Attachment A**.

1. Recipient public assistance:
  - a. Temporary Assistance to Needy Families (TANF)
  - b. General Assistance (GA)
  - c. Refugee Cash Assistance (RCA)
  - d. Supplemental Nutrition Assistance Program (SNAP)

- e. Other income based public assistance
- 2. Low-income individuals
  - a. Receives or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance To Needy Families (TANF), Supplemental Security Income (SSI) under Title XVI of the Social Security Act, or state or local income-based public assistance program
  - b. Receives an income or is a member of a family receiving an income that in relation to family size, is not in excess of the current U.S. DOL 70 Percent Lower Living Standard Income Level Guidelines and U.S. Department of Health and Human Services Poverty Guidelines or
  - c. Is a homeless individual, or
  - d. Is an individual with a disability whose own income meets the income requirements above, but who is a member of a family whose income does not meet this requirement.
- 3. Individuals who are basic skills deficient. The term “basic skills deficient” is defined to mean a youth or adult who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual’s family or in society.
  - a. Lacks a high school diploma or equivalency and is not enrolled in secondary education; or
  - b. Is enrolled in Title II adult education (including enrolled for English Language Acquisition); or
  - c. Has poor English-language skills and would be appropriate for ESL, even if the individual isn’t enrolled at the time of WIOA participation; or
  - d. The career planner makes observations of deficient functioning, and, as justification, records those observations in the data management system; or
  - e. Scores below 9.0 grade level (8.9 or below) on the Test of Adult Basic Education (TABE); Comprehensive Adult Student Assessment Systems (CASAS) or other allowable assessments as per National Reporting System (NRS) developed by the U. S. Department of Education’s Division of Adult Education and Literacy; or
  - f. Individual does not earn the National Career Readiness Certificate (NCRC) (e.g. one or more of the scores are below a Level 3 on the Workplace Documents, Applied Math, or Graphic Literacy assessments
- 4. Additional Priority Groups

Individuals (non-covered persons) who do not meet the above priorities may be enrolled on a case-by-case basis with approval from the **Executive Committee**. The WIOA eligible adult must meet one or more of the following categories of an individual with a barrier to employment:

  - a. Individuals with disabilities, including youth who are individuals with disabilities
  - b. Older individuals (age 55 or older)
  - c. Ex-Offenders
  - d. Eligible migrant and seasonal farm workers

- e. Single parents (including single pregnant women)
- f. Individuals who are:
  - English language learners
  - Have low levels of literacy (an individual is unable to compute or solve programs, or read, write, or speak English at a level necessary to function on the job, or in the individual's family, or in society)
- g. Underemployed individuals. Underemployed individuals may include:
  - Not employed in a career of choice, or a low skilled position;
  - Individuals employed less than full-time who are seeking full-time employment;
  - Individuals who are employed in a position that is inadequate with respect to their skills and training;
  - Individuals who are employed who meet the definition of low-income individual in WIOA sec. 3(36); and
  - Individuals who are employed, but whose current job's earnings are not sufficient compared to their previous job's earnings from their previous employment. Must be at 80% or below previous earnings.

Individuals who are underemployed and meet the definition of a low-income individual may receive career and training services under the Adult program on a priority basis. Individuals who meet the definition of an individual with a barrier to employment (see WIOA sec. 3(24)) who are underemployed may also be served in the Adult program. Individuals who were determined eligible for the Dislocated Worker program who are determined by policy to be underemployed, may still be considered eligible for career and training services under this program.

The above list is used only for applying priority for the individual to receive individualized career services and training services. Certain individualized career services or training services may require pre-and post-test scores to measure skills gain for the specific activity; in this case the determination is made by administering an acceptable skills assessment or by using scores from any partner's previous assessment.

All Parties certify that they will adhere to all statutes, regulations, policies, and plans regarding priority of service, including, but not limited to, priority of service for veterans and their eligible spouses, and priority of service for the WIOA Title I Adult program, as required by 38 U.S.C. §4215 and its implementing regulations and guidance, and WIOA sec. 134(c)(3)(E) and its implementing regulations and guidance.

A WIOA Adult Fourth Priority of Service Enrollment Request Form must be submitted for those participants that fall under the Adult Fourth Priority of Service. Approvals will be granted by the Executive Committee on a case-by-case basis. The Enrollment Authorization Request form must be submitted by the Monday prior to the next scheduled Executive Committee meeting to be considered. **(Attachment B)**

## Attachment A

### Adult Priority of Service Criteria Acceptable Documentation

Priority of Service Criteria	Acceptable Documentation
Recipient of Public Assistance	<ul style="list-style-type: none"> <li>• TANF eligibility verification</li> <li>• TANF period of benefit receipt verification</li> <li>• Copy of authorization to receive cash public assistance</li> <li>• Copy of public assistance check</li> <li>• Medical card showing cash grant status</li> <li>• Public assistance eligibility verification</li> <li>• Refugee assistance records</li> </ul>
Low-Income	<ul style="list-style-type: none"> <li>• Award letter from veteran's administration</li> <li>• Public assistance records</li> <li>• Pay stubs</li> <li>• Bank statements</li> <li>• Housing authority verification</li> <li>• Social security benefits</li> </ul>
Basic Skills Deficient	<ul style="list-style-type: none"> <li>• Case notes (explain how defined as basic skills deficient)</li> <li>• Assessment test results (CASAS)</li> <li>• Applicable records from Education Institution (transcripts, academic assessments, or other school documentation)</li> </ul>

Additional Priority Service Groups	Acceptable Documentation
Individuals with disabilities, including youth who are individuals with disabilities	<ul style="list-style-type: none"> <li>• Self-Attestation</li> <li>• School 504 records provided by student</li> <li>• Assessment of test results</li> </ul>
Older individuals (age 55 or older)	<ul style="list-style-type: none"> <li>• Valid driver's license or State ID</li> <li>• Birth Certificate</li> <li>• Passport</li> </ul>
Ex-Offenders	<ul style="list-style-type: none"> <li>• Court documents</li> <li>• Letter of parole</li> <li>• Letter from a probation officer</li> <li>• Police records</li> <li>• Document from juvenile/criminal justice</li> <li>• Halfway house resident</li> </ul>
Eligible migrant and seasonal farm workers	<ul style="list-style-type: none"> <li>• Self-Attestation</li> <li>• Cross-match with public assistance records</li> </ul>

	<ul style="list-style-type: none"> <li>• Case notes</li> <li>• Cross-match with State MIS Database</li> <li>• Cross-match with H-1B records</li> </ul>
Single parents (including single pregnant women)	<ul style="list-style-type: none"> <li>• TANF Single parent eligibility verification</li> <li>• WIC eligibility verification</li> <li>• Case notes (must have verified status with appropriate entity)</li> <li>• Self-Attestation</li> <li>• Needs Assessment</li> <li>• Signed intake application or enrollment form</li> <li>• Medical records</li> </ul>
Individuals who are: <ul style="list-style-type: none"> <li>• English language learners</li> <li>• Have low levels of literacy (an individual is unable to compute or solve programs, or read, write, or speak English at a level necessary to function on the job, or in the individual's family, or in society)</li> </ul>	<ul style="list-style-type: none"> <li>• Case notes</li> <li>• Assessment test results</li> <li>• Applicable records from Education institution (transcripts, academic assessments, or other school documentation)</li> <li>• Self-Attestation</li> <li>• Signed intake application or enrollment form</li> </ul>
Underemployed individuals	<ul style="list-style-type: none"> <li>• Unemployment insurance records</li> <li>• Layoff letter/WARN Notice</li> <li>• Employer Statement</li> <li>• Documentation RES/RESEA</li> <li>• Pay stubs showing insufficient earnings to date</li> <li>• Unemployment denial letter</li> <li>• Employer records</li> <li>• W-2 and/or tax returns</li> <li>• Termination notice</li> </ul>



## Attachment B

### Northeast Iowa Workforce Development Board WIOA Adult Fourth Priority of Service Enrollment Authorization Request

**Fourth Priority of Service** is a category of enrollment for WIOA eligible adults who do not meet the WIOA Adult Priority of Services categories one, two or three. Fourth Priority of Service Adults will be served on a case-by-case basis and upon approval by the NEIWDB Executive Committee for individuals whose barriers selected below present a barrier to obtaining employment that leads to self-sufficiency. There is no priority applied for receipt of basic career services and those should always be offered and available.

Enrollment Authorization Request form must be submitted by the Monday prior to the next scheduled Executive Committee meeting. The Executive Committee meets the first Monday of the month. Any requests submitted after the deadline will be considered for the next Executive Committee meeting.

<b>Applicant Name:</b>	<b>Career Planner:</b>

	Individuals with disabilities, including youth who are individuals with disabilities
	Older individuals (age 55 or older)
	Ex-Offenders
	Eligible migrant and seasonal farm workers
	Single parents (including single pregnant women)
	Individuals who are:
	English language learners
	Have low levels of literacy (an individual is unable to compute or solve programs, or read, write or speak English at a level necessary to function on the job, or in the individual's family or in society)
	Underemployed individuals. Underemployed individual may include:
	Not employed in a career of choice, or a low skilled position

	Individuals employed less than full-time who are seeking full-time employment
	Individuals who are employed who meet the definition of low-income individual in WIOA sec. 3(36); and
	Individuals who are employed, but whose current job's earnings are not sufficient compared to their previous job's earnings from their previous employment. Must be at 80% or below previous earnings.

Applicant Details:

<input type="checkbox"/> Yes	<input type="checkbox"/> No	Eligible Priority 1, 2 or 3?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Are they Eligible for Dislocated Worker?
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Are they Eligible for Youth?

---

## VETERANS PRIORITY OF SERVICE

Veterans and eligible spouses continue to receive priority of service for all DOL-funded job training programs, which include WIOA Title I programs. A veteran must meet each program's eligibility criteria to receive services under the respective employment and training program.

Priority of Service is the right of an eligible "Covered Person" to be given priority of service over an eligible non-covered person for the receipt of employment, training and placement services, notwithstanding other provisions of the law.

To determine eligibility for veterans and spouses:

- First, to veterans and eligible spouses who are also included in the groups given statutory priority for WIOA Adult formula funding. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive priority for services with WIOA Adult formula funds for individualized career services and training services. (NOTE: Military earnings are not to be included when calculating income for veterans or transitioning service members for this priority.)
- Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
- Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
- Fourth, priority populations established by the Governor and/or Local WDB.

## PROCUREMENT POLICIES AND PROCEDURES

Revised 1/8/2024

### PURPOSE:

This policy covers guidelines and processes for use by Northeast Iowa Workforce Development Board (NEIWDB) for the procurement of supplies, equipment, and other services with federal and non-federal funds. When purchasing with federal funds all procurement regulations must be met regardless of the guidelines and processes outlined in this policy. These policies are adopted to ensure that such materials and services are obtained in an effective manner.

The standards contained herein do not relieve the agency of the contractual responsibilities arising under its contracts. NEIWDB is the responsible authority, without recourse to the awarding agency, regarding the settlement and satisfaction of all contractual and administrative issues arising out of procurement entered into in support of an award or other agreement. This includes disputes, claims, and protests of award, source evaluation or other matters of a contractual nature. Matters concerning violation of statute are to be referred to Federal, State, or local authority, as may have proper jurisdiction.

---

The procedures that are outlined below are intended to provide the Northeast Iowa Workforce Development Board (NEIWDB), contractors, and subrecipients with guidance in determining the appropriate method of procurement to be used as well as procedures to follow in order to maintain compliance with all Federal, State and Local laws, rules, and regulations.

**Background:**

WIOA Sec. 184(a)(3)(A) require each State (including the Governor of the State), local area (including the Chief Elected Official for the area), and provider receiving funds under this title, to comply with the appropriate uniform administrative requirements for grants and agreements applicable for the type of entity receiving the funds, as promulgated in circulars or rules of the Office of Management and Budget (OMB). OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Final Rule Title 2 of the Code of Federal Regulations; 2 CFR 200.

**Policy:**

Procedures are in place to ensure that unnecessary or duplicative items or services are not purchased, to ensure that conflict of interest has been avoided, code of conduct has been established, and to ensure that positive efforts have been made to utilize small business and minority-owned business sources for procurement.

NEIWDB has established a code of conduct for Board members and employees engaged in the awarding and administration of contracts using grant funds. The code of conduct is attached to and made a part of these procurement policies. Violation of the code of conduct shall be grounds for disciplinary action including removal from the Board or termination of employment. An official position may not be used for personal gain, nor shall a board or staff member engage in any business transaction, none have a financial or other interest, direct or indirect, which is a conflict with the proper discharge of duties. Announcement of a potential conflict must be made and refrain from further discussion or voting. No board member or staff shall, without proper authorization, disclose confidential information concerning the procurement of property and services administration or affairs of the Board. Nor shall they use such information to advance the financial or other private interest of themselves or others.

Federal regulations require that written standards of conduct governing the performance of their employees engaged in the award and administration of contracts. No employee, officer or agent shall participate in the selection; award or administration of a contract supported for Federal funds if a real or apparent conflict of interest would be involved. Included are employees, officers or agents and any member of his or her immediate family, partner, or

organization which employs or is about to employ any of the parties, has financial or other interest in the firm selected for an award.

No Board member or staff shall, without proper authorization, disclose confidential information concerning the procurement of property and services, administration, or affairs of the Board. Nor shall they use such information to advance the financial or private interest of themselves or others. Violation of the code shall be grounds for disciplinary action including removal from the Board or termination of employment.

All potential providers and vendors, who have expressed interest in being considered for contracts, will be placed on the bidder's list, and sent solicitations for the areas of services for which they wish to be considered when such awards are due to be made. When possible, attempts will be made to procure minority firms by placing all qualified small and minority businesses and women's business enterprises on the potential vendor's list. Contractors will also be encouraged to take these affirmative steps.

The procurement process for the selection of service providers will take into consideration the provider's ability to meet contract objectives as well as other criteria as determined locally by the NEIWDB. Examples of how the ability to meet the procurement objectives can be demonstrated include, but are not limited to:

- Financial resources, technical qualifications, experience, organization, and facilities adequate to carry out the project.
- Resources to meet the completion schedule contained in the contract.
- A satisfactory performance record for completion of contracts.
- Cost analysis of proposed budget-accounting and auditing procedures adequate to control property, funds, and assets.

The competitive procurement process for the selection of service providers and One-Stop Operators will occur every four years.

The NEIWDB will ensure that any entity is not debarred, suspended, or otherwise excluded from or ineligible to participate in Federal assistance programs or activities. Information about the selection of contractors and providers will be made available to the public on a regular basis through electronic means, in accordance with the Sunshine Provision.

All negotiations of the contract for or with potential contractors/service providers must be arm's length negotiations. The definition of arm's length negotiation is a negotiation where the parties

to the negotiation have equal bargaining power and symmetric information, leading to agreement upon fair market terms.

---

## METHODS OF PROCUREMENT

NEIWDB shall use one of the following methods of procurement, depending upon the nature of goods and services to be secured, and the terms and conditions contained within this policy.

- Micro Purchases
- Small Purchases- Request for Quotes
- Sealed Bids
- Competitive Proposals- Request for Proposals
- Noncompetitive Procurement- Sole Source

NEIWDB shall have the sole discretion to choose whatever procurement method is applicable within these guidelines.

Methods of procurement vary by the size and type of the purchase. In all cases, purchases will be reviewed for cost reasonableness to foster greater economy and efficiency. Applicable NEIWDB policies and procedures should be followed in conjunction with these policy guidelines. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the economical approach.

Informal written solicitation documentation shall be used to secure responses from an adequate number of qualified third parties. Information collected should include a description of the item or service needed; proposed time schedule needed; comparison of costs including setup, delivery, taxes, etc.; and reason for selection if other than cost.

Use of intergovernmental agreements within the state for cooperative procurement or where goods and services have already been evaluated and procured is encouraged to foster greater economy and efficiency, and do not need additional solicitation documentation.

---

## MICRO-PURCHASES

Micro Purchase is simple and informal procurement method to procure goods and services which do not exceed \$10,000.

- Procurement by micro-purchase is the acquisition of supplies or general professional and non-professional services, the aggregate dollar amount of which does not exceed \$10,000 with a single vendor during a fiscal year.

- Micro-purchases may be awarded without soliciting competitive quotations for acquisitions if the price considered to be reasonable.
- To determine if the price is “reasonable”:
  - Research by surveying qualified supplies in the area;
  - Use experience and personal knowledge of the item(s) being purchased;
  - And review purchase history by comparing previous purchases of similar item(s).
- Micro-purchases will be distributed equitably among qualified suppliers.

NEIWDB may elect to use another method of procurement for purchases under \$10,000 and if it does shall adhere to the requirements pursuant to that method selected.

### SMALL PURCHASES – REQUEST FOR QUOTES

Threshold: Required for Purchases of \$10,000- \$50,000.00. For purchases where the price is the overriding factor, which involves standardized products or services, and where the aggregate acquisition costs are greater than the micro-purchase threshold (\$10,000) but do not exceed the small purchase threshold (\$50,000.00).

Or services where price is not the overriding factor but are relatively simple and straightforward purchases the NEIWDB may use relatively simple and informal procurement methods by obtaining price or rate quotations from an adequate number of qualified sources but not less than three sources, if three sources are available.

This informal method requires:

- Verbal or written solicitation document
- Free and open competition (up to three quotes)
- Documentation of the procurement process (vendor name, contact method, name of person providing price quoted, date price quote obtained, duration of price quote).

This informal method does not require:

- Public notice
- Sealed bid (do not share price quotes during the solicitation process)
- Public opening
- Due date for solicitation responses

### SEALED BIDS

An option for purchases of \$50,000.00 and above is a Request for Bid (RFB). A RFB is always a publicly advertised, formal solicitation.

- The RFB includes well-defined specifications and/or scope of work, including all contractual terms.
- A Request for Bid (RFB) is always publicly advertised. Formal solicitation is required, fixed price (lump sum or unit price) is awarded to the responsible bidder who conformed to all material terms and is the lowest in price.
- The RFB includes well-defined specifications and/or scope of work, including all contractual terms.
- Bids for the goods or services must be received by a set date, time, and place, where they may be publicly opened.

Responsible bidder means a vendor that has the capability in all respects to perform the contract requirements. In determining whether a vendor is a responsible bidder, the board may consider various factors and will be determined by the Executive Committee.

Procurement by sealed bids is most appropriate when there is relatively no difference between the good or service offered by one vendor from that offered by another. Procurement by sealed bids is not appropriate when the procurement decision will be based on more than price (i.e., quality of the good or service).

#### COMPETITIVE PROPOSALS – REQUEST FOR PROPOSALS

A Request for Proposal (RFP) is always publicly advertised, formal solicitation and is used when it is not appropriate to use sealed bids and the amount of the contract is over \$50,000. This occurs when other factors in addition to price influence the award decision.

- Purchases of supplies, equipment, and any professional service, including delivery of services of WIOA Title I-B activities, of \$50,000 or more shall be procured through competitive proposal.
- Requests for Proposals (RFP's) will be publicized and solicited from an adequate number of qualified sources.
- Well-defined specifications and/or scope of work and contains all contractual terms and conditions. The RFP solicits two parts to a proposal- technical and cost- from prospective vendors.
- Description of required services or components, clear description of any technical requirements, and evaluation factors and their relative importance will be identified in the proposal.
- Responses will be reviewed and evaluated based on consistent grading methods for each proposal. Review Committees will be established for evaluating delivery of WIOA Title I-B services and One-Stop Operator duties.
- After an evaluation of all proposals submitted, a contract is awarded to the provider who submits the proposal most advantageous to NEIWDB.

The NEIWDB shall use Request for Proposals when the conditions are not appropriate for the use of competitive sealed bidding, micro-purchases, small purchases, or non-competitive proposals.



The technique of competitive proposals is normally conducted with more than one source submitting an offer, a contract is awarded, and the following conditions are met:

- The complex and technical nature of the procurement cannot be described in bid specifications; and
- It is logical to award a contract on factors other than price.
- You anticipate that a good or service expected to cost less than \$50,000 will need to be procured again from the same vendor during the same fiscal year and the aggregate amount of procurements is expected to exceed \$50,000.

When selecting contractors and service providers, award will be made to the responsible firm whose proposal is most advantageous to the program. Selection consideration will be given to such matters as price, contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. An additional price analysis will be conducted if the anticipated award amount is in excess of the Simplified Acquisition Threshold as set by federal guidance.

Contractors will be verified they are not excluded from participation in federal awards.

Contracts will be administered to ensure contractor conformance with the terms, conditions, and specifications. Contractor performance reviews and monitoring shall be done per programmatic requirements.

Records sufficient to detail the history of procurement will be maintained. These records will include but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

Solicitations for goods and services (requests for proposals or RFPs) should provide for all of the following:

- Requirements that the bidder/offer must fulfill and all other factors to be used in evaluating bids or proposals.
- Funding level range or an up-to amount must be provided in the RFP that ensures the responsibilities in the Statement of Work can be performed.
- Requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards. (45 CFR Part 75.328(c)(1))
- The specific features of "brand name or equal" descriptions that bidders are required to meet when appropriate. (45 CFR Part 75.328(c)(1))
- A description of the format, if any, in which proposals must be submitted, including the name of the person to whom proposals should be sent.

- The date by which proposals are due.
- Required delivery or performance dates/schedules.
- The release of an RFP for services does not obligate the NEIWDB to accept any or all proposals. The NEIWDB shall be held harmless of any action resulting from any decision not to accept any or all proposals.

## NONCOMPETITIVE PROPOSALS – SOLE SOURCE

Procurement by noncompetitive proposals, or sole source, is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following conditions apply:

- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or
- After solicitation of a number of sources, competition is determined inadequate.
- The purchases are for equipment or services where the prices are established by law for technical equipment requiring standardization and interchangeability of parts with existing equipment.

Noncompetitive proposals require the mutual discussion and arrangement of terms of a transaction or agreement for the purpose of arriving at a common understanding of contract essentials such as technical requirements, schedules, prices, and terms. For any noncompetitive proposal in excess of the small purchase threshold, written documentation must be included in the records to show why a noncompetitive proposal was used instead of competitive bidding.

### Sole Source for Providers

Sole source must only be pursued after a minimum of two attempts to competitively procure, including one attempt that combines the procurement of the Adult and Dislocated Worker service provider with the selection of the One-Stop Operator. Sole source selection of a service provider can only be completed under the criteria outlined in WIOA. Should the NEIWDB request to use sole source procurement for services providers it will submit a formal request to IWD electronically.

The request must include justification that all other options were exhausted and identify the reason for sole source. The NEIWDB will identify the timeline and the activities performed prior to the sole source request and must certify that all appropriate measures consistent with the WIOA and this policy have been taken.

The following documentation will be included with the request for sole source:

- Copy of the RFP or IFB
- Proof of the announcement medium used (newspaper, social media)
- Documentation showing how long the announcement was posted
- The name of the entity to which the sole source is to be awarded
- Documentation showing that the entity has the capacity and ability to perform the one-stop operator functions, **OR**
- Documentation showing that the entity has the capacity and ability to perform the functions required to provide career services and/or youth workforce innovation opportunity activities.
- Well-defined specifications and/or scope of work and contains all contractual terms and conditions. The RFP solicits two parts to a proposal- technical and cost- from prospective vendors.
- Description of required services or components, clear description of any technical requirements, and evaluation factors and their relative importance will be identified in the proposal.
- Responses will be reviewed and evaluated based on consistent grading methods for each proposal. Review Committees will be established for evaluating delivery of WIOA Title I-B services and One-Stop Operator duties.
- After an evaluation of all proposals submitted, a contract is awarded to the provider who submits the proposal most advantageous to NEIWDB.

---

## REJECTION OF BIDS OR PROPOSALS

A bid/proposal response that fails to provide the required forms or which does not comply with the specifications, terms, and conditions of the RFB or RFP may be considered non-responsive and rejected. Unless stated otherwise in the solicitation documents, submissions that include an alternate bid/proposal are unresponsive and subject to disqualification.

---

## CANCELLATION OF SOLICITATION

The NEIWDB may cancel a solicitation at any time during the procurement process prior to signing a contract if the requirement stated in the solicitation no longer exists, funds are lacking, the board decides not to proceed with the solicitation, or for any other reason.

---

## PROCUREMENT RECORDS

The NEIWDB must develop and maintain a record/file of each relevant procurement sufficient to detail the significant history of the procurement and support the procurement decisions made. The record should include the following information as appropriate for the type of procurement performed:

- A description of the item(s) being procured.

- Evidence of NEIWDB involvement in the decision-making and planning process.
- A copy of the solicitation package (RFP/RFQ/RFB).
- A copy of the public notification.
- Bidder's list
- A copy of each bid received.
- Results of all reviews and evaluations for all proposals received and score sheets completed during the evaluation process.
- The name of the selected provider or vendor, the amount of the procurement, and the delivery date of the good or service.
- Copy of any submitted grievances and the resolution of each.
- Risk analysis determinations and special award/ contract conditions, if appropriate.

---

## CONTRACT PROVISIONS

In the limited contracts in excess of the simplified acquisition threshold as stated in this policy, the majority of contract provisions required for WIOA expenditures include:

- Termination for cause and convenience
- Termination for default
- Damages
- Compliance with WIOA
- Access to Contractors records
- Maintenance of records
- State energy conservation.
- EEO/ADA/Drug Free workplace provisions as appropriate.
- In instances of NEIWDB acting as a pass-through entity every subaward will be clearly identified as such and include the information as required in § 200.331

RFP attachments must address:

- Anti-lobbying certificates
- Debarment and Suspension certificate

Affirmative Action considerations will be made in making effort to solicit and utilize small business, minority-owned firms, and women's business enterprises, whenever possible. This will include gaining access to the Chamber list of minority owned and small businesses and actively seeking bids.

---

## RIGHT TO FILE A GRIEVANCE

Any organization making an application under an RFP has the right to file a grievance related the RFP process within five (5) business days of the award announcement.

---

- All grievances must be made in writing and must fully identify any contested issues and/or policy or procedural violations.
- Subjective interpretations by evaluators are not subject to protest or grievance.

A bidder may file a grievance in writing, with the NEIWDB Executive Director, who will then have ten (10) days in which to reach an informal written resolution of the grievance.

Should the grievance not be resolved within ten (10) days, the bidder may submit in writing a protest to the NEIWDB Executive Committee.

The Executive Committee will then have twenty (20) days to reach a formal written decision.

A hearing is not right under this NEIWDB grievance policy.

- No further appeals will be allowed.
- This does not prohibit the bidder from seeking other resolutions in addition to those allowed by the Northeast Iowa local area.
- Any further resolutions taken by the bidder outside of this policy will be handled by the CEOs in the Northeast Iowa local area.

---

## STANDARDS OF CONDUCT

The proper operation of a democratic process requires that actions of Board members and employees be open and impartial; that decisions and policy be made in the proper channels of NEIWDB organizational structure; that neither Board membership nor NEIWDB staff positions shall be used for personal gain; and that the public have confidence in the integrity of the Board and its staff. In recognition of these goals the Council has established a written Code of Ethics for all Board members and staff.

Any officer, employee, or agent of the NEIWDB who is either:

- engaged in negotiations with a potential contractor.
  - has arrangements concerning prospective employment with a potential contractor; or,
  - has a financial interest in a potential contractor may not participate in the review, award, or administration of a contract for a potential contractor. Such relationships constitute a Conflict of Interest. This prohibition also extends to:
    - an immediate family member of any officer, employer, or agent of the grantee/sub-grantee.
    - a partner or organization who employs any officer, employee, or agent of the grantee/sub-grantee.
-

Additionally, no NEIWDB member shall participate in the selection or in the awarding of a contract if a conflict of interest is involved.

This provision does not prohibit a community-based organization, educational agency, employer, or other service provider represented by an NEIWDB member from receiving a contract for the provision of training and/or services to participants.

However, when such a conflict of interest arises, LWDB members must abstain from voting on the award and disclose all financial/non-financial information of the contractor. No employee, officer, or agent of the NEIWDB shall participate in the selection, awarding, or administration of a contract if a conflict of interest exists. No contract will be awarded to any NEIWDB member or entity with which he/she is affiliated which results in direct personal gain to that NEIWDB member. NEIWDB officers, employees, or agents shall neither solicit nor accept gratuities, favors, or anything of monetary value from service providers, potential service providers (i.e., persons who perform services of the type contracted for), or parties to grants.

---

## CONFIDENTIALITY AND NON-DISCLOSURE

Information will not be disclosed to anyone who is not directly involved in the procurement process relating to the intent to implement a procurement, the amount of funds available, or any related data, until that information is made known to all bidders through a notification of the intent to solicit or dissemination of a Request for Proposal (RFP) or Request for Quote (RFQ).

Technical and cost/price information from any proposal must not be disclosed to anyone not officially involved in the procurement process while the procurement is still in progress.

Certain technical or proposal information that a bidder has designated as proprietary or trade secret, and with which NEIWDB concurs, must not be disclosed to other bidders, even after the award is made and publicized.

The number of names of bidders will not be disclosed to anyone not officially involved in the procurement process until the contract is awarded and the decision is made public.

## SERVICE PROVIDER TRANSITION

3/4/2024

### Purpose:

This policy outlines the procedures and guidelines for the transition of Workforce Innovation and Opportunity Act (WIOA) Title I Service Provider use by Northeast Iowa Workforce Development Board (NEIWDB). This policy aims to ensure a seamless transfer of services, minimize disruption of services for active participants, and maintain compliance with federal and state regulations.

---

## NOTIFICATION AND PLANNING

The task of formulating communication content targeting partners, committee members, board members, Chief Elected Officials, stakeholders, and participants lies within the purview of the Northeast Iowa Workforce Development Board (NEIWDB). All communications aimed at active participants are required to be officially recorded within the IowaWORKS system for documentation purposes.

---

## PARTICIPANT COMMUNICATION

To ensure a smooth transition of service providers, the Northeast Iowa Workforce Development Board (NEIWDB) is committed to implementing a thorough communication plan directed towards informing participants of the impending change. This plan will not only strive to address any concerns raised by participants but also establish effective mechanisms for collecting and incorporating their valuable feedback.

Our primary objective is to minimize any potential disruption in services for active participants throughout this transition period. To uphold transparency and accountability, all communication activities will be documented in the IowaWORKS system. This approach aims to foster a collaborative and supportive environment during this transitional phase.

---

## PROCUREMENT

The Northeast Iowa Workforce Development Board (NEIWDB) is committed to adhering to current procurement policies outlined in local, state, and federal procurement regulations as it embarks on the process of appointing a new Service Provider. The procurement procedures will encompass the formulation of a comprehensive Request for Proposals (RFP), the establishment of meticulous evaluation criteria, and the establishment of a selection and review committee. Please reference Northeast Iowa's Procurement Policy for additional information.

---

## TRANSITION TIMELINE

The Northeast Iowa Workforce Development Board (NEIWDB) will establish a detailed timeline outlining key milestones and deadlines throughout the transition period. These milestones are crucial events that mark progress in the process, ensuring a structured and organized transition. The commitment to specific deadlines further emphasizes the board's focus on efficient planning and execution. The current service provider will continue offering services until the end of the contract, and the NEIWDB aims to initiate services by the new provider seamlessly. The transition period is intricately designed to minimize disruptions for participants relying on workforce development services. Moreover, the board underscores its commitment to a smooth

---

handover of responsibilities, signifying a clear transfer of duties, information, and resources to maintain the quality and availability of services throughout the transition.

Overall, this transition timeline is designed to uphold service continuity, meet defined milestones, and facilitate a seamless transfer of responsibilities for effective and uninterrupted workforce development service delivery.

The timeline will be shared with all parties involved in the process including but not limited to partners, local board members, Chief Elected Officials, and key stakeholders.

---

## TRANSFER OF PARTICIPANT RECORDS

The IowaWORKS system serves as the primary repository for participant files, ensuring accessibility, accuracy, and regular utilization. Outgoing service providers are required to guarantee the currency and completeness of all active WIOA participant files within the system. In cases where paper records related to active or exited participants are not accessible through the IowaWORKS system, they must be physically located within the designated AJC by a specified date, as determined by the LWDB.

### *Data Security and Confidentiality:*

During the transfer process of participant files, utmost attention must be given to data security and confidentiality. All outgoing service providers are obligated to implement robust measures to safeguard sensitive information. This includes but is not limited to, personal details, employment history, and any other confidential information pertaining to the participants. Encryption protocols, secure channels, and restricted access should be enforced to prevent unauthorized disclosure or data breaches.

### *File Integrity and Accuracy:*

Service providers are responsible for ensuring the integrity and accuracy of participant files within the IowaWORKS system. Regular audits and quality checks should be conducted to identify and rectify any discrepancies or inaccuracies promptly. Any updates, changes, or additions to participant information must be promptly reflected in the IowaWORKS system to maintain the reliability of the data.

---

## MONITORING AND EVALUATION

The Northeast Iowa Workforce Development Board (NEIWDB) and its dedicated board staff will actively engage in the ongoing supervision and oversight of the entire transition process. Their primary focus will be to guarantee strict adherence to both federal and state regulations governing workforce development initiatives. This monitoring and evaluation function encompasses a comprehensive review of the transition's various elements, ensuring that all actions and procedures align with the stipulated legal and regulatory frameworks. Through this



vigilant oversight, the NEIWDB aims to uphold the integrity of the transition process and foster a seamless transition that meets the required compliance standards.

---

### INTERIM SERVICE PROVIDER SERVICES

It is acknowledged that during the transition from the conclusion of one Title I service provider contract to the start of a new one, there may be a period where no specific service provider is assigned. To safeguard the continuous provision of Title I services and prevent any disruptions, alternative partner programs may be engaged temporarily. The NEIWDB holds the responsibility of guaranteeing the uninterrupted delivery of Title I services. To avert service interruptions, staff from other partner programs may be called upon to temporarily assume the role of Title I service providers.

In situations where the assistance of another partner program is sought, the NEIWDB will collaborate with those staff members, ensuring they undergo proper training and onboarding processes to effectively fulfill the responsibilities associated with Title I services. The NEIWDB, in conjunction with IWD, will oversee the training procedures. The NEIWDB Executive Director and board staff will take charge of disseminating comprehensive transition guidance to all involved parties, including the services provider undergoing the transition and the partner staff temporarily involved in delivering Title I services. Effective communication is pivotal to ensure alignment among all stakeholders and to guarantee the continued provision of services to customers during this transitional phase.

---

### ROLE OF FISCAL AGENT DURING TRANSITION

In order to prevent any disruptions, the Northeast Iowa Workforce Development Board may designate the Fiscal Agent to assume the responsibility of processing payments to participants and/or service providers engaged in delivering essential services to customers. These payments encompass various reimbursements, such as those associated with participant and training services, including supportive services, among others.

The authorization for this arrangement may be granted by the Finance Committee, with the final approval resting either with the Executive Committee or the full board, depending on which is achieved first. If the Fiscal Agent takes on this role, they will bear responsibility for furnishing the Finance Committee with a comprehensive ledger detailing the payments made, accompanied by the necessary documentation substantiating these payments. This proactive measure ensures financial transparency and accountability during the transitional period. The Fiscal Agent will follow all local, state, and federal policies and guidelines. A separate contract will be established in this situation.

---

## ROLE OF EMPLOYER OF RECORD DURING TRANSITION

In order to prevent any potential disruptions, the Northeast Iowa Workforce Development Board has the authority to assign the Employer of Record the responsibility of serving as the official employer for participants engaged in services that involve paid wages, such as Work Experience Programs (WEPs). The authorization for this arrangement may be granted by the Finance Committee, with the final approval resting either with the Executive Committee or the full board, depending on which is achieved first. The Employer of Record is expected to adhere diligently to all pertinent local, state, and federal policies and guidelines governing these specific circumstances. This strategic measure is implemented to ensure a smooth and uninterrupted provision of services, maintaining compliance with established regulations throughout the transition period. A separate contract will be established in this situation.

---

## NORTHEAST IOWA SERVICE PROVIDER TRANSITION GUIDANCE

For existing WIOA Title I service providers who will no longer provide services, this document provides guidance and instructions regarding the transition. This document will be provided by the Northeast Iowa Workforce Development Board with oversight by the NEIWDB Executive Director. This document aims to ensure a smooth and organized transition, minimizing disruptions to both service providers and the customers they serve, while adhering to WIOA regulations and compliance standards. It is crucial for all parties involved to follow the outlined guidelines to facilitate an effective and seamless transition process. This transition guidance may be adjusted at any time during the transition period.

Sample Service Provider Transition Guidance:

I. **Case Files (paper/electronic access):**

- a. Outgoing service providers must ensure that all active WIOA participant files are located at the designated AJC no later than (date specified). QA must verify all exited files are located at the designated AJC no later than (date specified).

LWDA	Current Service Provider	AJC to receive files	Contact person at AJC	Location for Required Documents
Northeast Iowa		Waterloo, Mason City, Dubuque, and Decorah	List Names of Current Operations Managers at each AJC	Be specific

- b. Outgoing service providers must ensure that all inactive WIOA participant files are located at the designated AJC no later than (date specified). These files should be alphabetized, boxed neatly, and clearly marked as "inactive." (Use table above for reference).
- c. A list of all participant files accounted for must be provided to the LWDB by (date specified).
- d. All files must be in a locked room not accessible to others in the office. Location of files must be placed in the designated area mentioned above.
- e. Outgoing service providers must provide a comprehensive list in an Excel spreadsheet of all financial information relative to active participants. This includes but is not limited to – obligations, expenses, anticipated expenses which includes supportive services and needs based payments, etc. Any tracking

documents or mechanisms that can provide detail needed for the next service provider to continue services with no interruption for participants. This information must include, at a minimum, - participant name, participant id number, amounts obligated, reason for obligation (OJT, OST, WEP, TRN, etc.), type of funding (Adult, DW, Youth, NDWG, etc.), anticipated date. This list must be provided no later than (date specified), noon (CDT), to the LWDB. *(Spreadsheet is provided)*.

- f. Any obligations not on the above list must be directed to board staff.
- g. IowaWORKS Data/Case Management System-
  - i. All service provider staff with access to the IowaWORKS Data/Case Management System will ensure all participant files are complete and up to date by (date specified), 4:30 p.m. (CDT).
  - ii. As of (date specified), 4:30 p.m. (CDT), all outgoing service provider staff with access to the IowaWORKS system and related systems will have their access revoked, including LMS.

**II. Records retention:**

Subrecipient shall retain all records pertinent to this Agreement, including financial, statistical, property, participant (including intake and placement information), and supporting documentation. Subrecipient agrees to retain all its records, books, papers, or documents related to this agreement for a period of not less than five (5) years after the expiration of this agreement. The aforementioned records will be retained beyond five (5) years if any litigation, audit, finding of a questioned cost (either an independent, State or Federal audit) is begun or if a claim is instituted involving the grant or agreement covered by the records. In these instances, the records will be retained until otherwise instructed by the Fiscal Agent or LWDB.

**III. Local and State Monitoring:**

- a. The LWDB recognizes the importance of addressing outstanding monitoring findings to ensure the integrity and effectiveness of the WIOA Title I program for current and future participants. We are fully committed to resolving these issues transparently and collaboratively during this transition period.
- b. Any pending monitoring reports require a response by the specified date detailed within the report. Acknowledging the contract's termination, the LWDB recognizes that a Corrective Action Plan cannot be formulated and enforced, given the impending conclusion of the contract. The LWDB is committed to offering assistance in crafting the necessary language for addressing these matters.
- c. The LWDB expects that the Title I service provider will furnish the necessary updated documentation to address and resolve any findings highlighted in the monitoring reports.
- d. Any questioned costs must be resolved and will follow Section 9 of the contract (referenced below).

It is agreed and understood by and between the parties that any funds expended by SUBRECIPIENT in violation of said standards, principles, policies, or the provisions of this Agreement or WIOA are disallowable. In the event that such disallowable expenditures are deemed to have been reimbursed, LWDB/Fiscal Agent shall upon written notification to SUBRECIPIENT request adjustment or repayment of such disallowed expenditures. SUBRECIPIENT shall make such adjustment or repayment within thirty (30) days from receipt of said notification. Funds declared to be provided for ineligible participants or ineligible services to participants will be returned to the Fiscal Agent/LWDB within thirty (30) days of determination and request for payment. The Fiscal Agent may withhold any payments to the SUBRECIPIENT for the purposes of set-off until such time as any disallowed cost is repaid.

**IV. Grant Close Out:**

Subrecipient shall submit a Final Closeout Report no later than forty-five (45) days after the end of grant or Agreement period, in such form as designated by the LWDB and/or Iowa Workforce Development (IWD). The LWDB/IWD shall not be liable for any costs which have not been billed to the LWDB within forty-five (45) days after the agreement period has expired. The Fiscal Agent/LWDB agrees to provide subrecipient with the final closeout reporting format within sixty (60) days of the date the report is due. The LWDB may withhold reimbursement for the final monthly expenditure report until the Final Closeout Report is submitted, and all outstanding services are performed.

- a. The Fiscal Agent/LWDB may withhold reimbursement until all invoices have been reconciled and are accurate with all supporting documentation provided.
- b. The Finance Committee must give final approval before invoices are reimbursed.

**V. Leases:**

- a. IWD Premises will review and address sub-leases per location.

**VI. Property/ equipment:**

All property and equipment purchased for the administration of this Agreement or transferred to Subrecipient belongs to the LWDB and shall continue to be the property of the LWDB when the agreement terminates and shall not be used for any purpose other than to provide the services covered under this agreement unless it has the express written consent of the LWDB. The purchase of any such property shall be included in Subrecipient's monthly report. Upon termination of this agreement or at the end of the agreement period the Subrecipient shall either return to the LWDB within thirty (30) days, all property furnished to the Subrecipient or property which was purchased with funds under WIOA or request in writing approval from the LWDB to dispose of said property.

The Subrecipient agrees to maintain careful accountability of all WIOA purchased non-expendable property (property with a life expectancy of one year or more and a unit cost of \$500.00 or more) and to maintain an inventory of all properties acquired with WIOA funds, to be inventoried annually. Acquisition of non-expendable property with a unit cost of \$1,500.00 or more must be approved by the LWDB, prior to the purchase. Additionally, equipment with an original acquisition cost of \$50.00 and up that also has a serial number should be kept on the inventory software. Examples of which equipment that may include are PC's, terminals, laptops, printers, servers, control units, hubs, modems, routers, external tape backup units, convenience bases, external CD ROM drives, external hard drives, scanners, etc. Any disposal of WIOA property must be according to applicable federal, state, and local disposal procedures. Any revenues derived from the sale of property purchased with WIOA funds must be used in WIOA service delivery for the program(s) which funded the original purchase.

OMB Circular 2 CFR 200.313

- a. Any equipment purchased with WIOA funds that is still operable belongs to the program and must be surrendered by the outgoing provider.
- b. Each outgoing service provider must supply an inventory list to the LWDB by (date specified), which identifies equipment to be surrendered, location of equipment as well as any necessary passwords and login information.
- c. All equipment must be delivered to the designated AJC (if not already located at an AJC) no later than (date specified) at 4:30 p.m. (CDT). Use table located on page one to determine appropriate AJC location.

VII. **Audit:**

The Subrecipient shall, at any time and as often as the Fiscal Agent, LWDB, Chief Elected Officials (CEOs), State of Iowa, the Comptroller General of the United States and/or any of their duly authorized representatives may deem necessary, make available for examination all its records and data that pertain to work performed under this Agreement for the purpose of making audits, examinations, excerpts, transcriptions, and photocopies. Access includes any books, documents, papers, or records, including computer records, of any contractor or subcontractor, which are directly pertinent to charges made under this Agreement. Rights shall also include timely and reasonable access to personnel for the purpose of making audits, examinations, excerpts, transcriptions, interviews, and discussions related to such documents. The Fiscal Agent or LWDB, where practical, will provide Subrecipient with a minimum 72-hour notice for regularly scheduled audit or inspection and a 24-hours' notice of any emergency audit or inspection.

VIII. **Creative Common License:**

Intellectual Property- Upon acceptance of LWDB/IWD of any intellectual property created as part of Subrecipient or subcontractor performance of this Agreement, that property shall become the exclusive property of LWDB/IWD, free from any claim, lien or interest in the intellectual property, and Subrecipient or subcontractor shall not have any right to disclose or use any portion of an intellectual property created and delivered pursuant to this Agreement. This Agreement shall cover works made for hire and LWDB/IWD shall have exclusive right to reproduce, modify, distribute, display, perform, or license the works. Where federal funds are involved, the federal awarding agency reserves a royalty-free, nonexclusive and irrevocable license to reproduce, publish or otherwise use, and to authorize others to use, for Federal Government purposes: (a) the copyright in any work developed under a grant, subgrant, or contract under a grant or subgrant and (b) any rights of copyright to which a grantee, sub-recipients or a contractor purchase ownership with grant support, as set forth in Federal Register-OMB 2 CFR Chapter II, Part 200 (OMNI Circular).

IX. **Referrals**

- a. Referrals being made directly to Title I should still be met with by Career Planners and eligibility should be completed.

- b. Co-enrollment to other partners should be utilized in order to leverage additional resources and support for participants. Collaborative efforts can enhance the range of services available without solely relying on Title I funding. Diversifying funding streams can help expand the resources available for participant support.
  - c. The referrals that are coming in outside of the referral process already in place should be tracked with a spreadsheet and updated and shared with board staff weekly (every Friday) until the contract end date. Spreadsheet is provided with required information.
- X. **Communication to Wagner-Peyser Staff Assisting During the Transition (if utilized)**
  - a. The LWDB requires that current Title I staff members plan to communicate with the Wagner Peyser staff located at the AJC that have been assigned to assist current participants beyond (date specified).
  - b. Please complete the Participant Overview spreadsheet and share directly with the LWDB no later than (date specified) or last date of employment whatever comes first.
  - c. Wagner Peyser staff assigned to assist are as follows:
    - i. Decorah-
    - ii. Dubuque-
    - iii. Mason City-
    - iv. Waterloo-
- XI. **Communication to existing participants:**
  - a. Outgoing providers must communicate in writing (email is acceptable) to each active participant as well as participants receiving follow-up services regarding the transition of services providers.
    - i. Email language will be provided by board staff to be sent to all active participants including those that are in follow-up. The email must come from the Career Planner and cc: Title I Director. A copy of the email should be case noted in the IowaWORKS system. The Career Planner should be responsible for documenting in the IowaWORKS system. The email should be sent out and documented no later than (date specified).
    - ii. Regular communication will be consistently delivered throughout the transition period. All pertinent information will be disseminated exclusively by the Northeast Iowa Workforce Development Board (NEIWDB).

## TICKET TO WORK FUND REQUEST

6/24/2024

The Northeast Iowa Workforce Development Board (NEIWDB) establishes the following policy for the administration and utilization of Ticket-to-Work funds. The NEIWDB is committed to ensuring the proper and efficient use of Ticket to Work funds in accordance with established guidelines and regulations. All fund requests must undergo a thorough review and approval process to maintain transparency and accountability.

### **Background**

The Ticket-to-Work program is a voluntary initiative by the Social Security Administration (SSA) designed to help Social Security Disability Insurance (SSDI) beneficiaries and Supplemental Security Income (SSI) recipients find employment, achieve financial independence, and reduce their reliance on disability benefits. The program offers a range of employment-related services, including career counseling, job training, vocational rehabilitation, job placement assistance, and ongoing support services. Participants work with Employment Networks (ENs) to receive these services. The program is available to individuals aged 18 to 64 who receive SSDI or SSI benefits due to a disability, and it ensures that participants are not at risk of losing their benefits simply

by participating. By promoting self-sufficiency, the Ticket-to-Work program aims to enhance the quality of life for beneficiaries while also alleviating the financial burden on the Social Security system.

Funds generated to the Northeast Iowa Workforce Development Board (NEIWDB) through the Ticket-to-Work program primarily come from the Social Security Administration (SSA). The SSA makes outcome-based payments to Employment Networks (ENs) for the employment services they provide to beneficiaries. These payments are made when specific milestones and outcomes are achieved, such as the beneficiary finding a job or achieving a certain level of earnings. The funds for these payments come from the SSA's budget, which is derived from federal funds allocated to support disability programs.

The Northeast Iowa Workforce Development Board (NEIWDB) has flexibility in how they use these funds. We aim to support our partners and their initiatives effectively, leveraging Ticket-to-Work funds to enhance employment outcomes and services for individuals that are being served within the Northeast Iowa local area.

### ***Purpose***

To provide a structured and transparent process for the review, approval, and disbursement of Ticket-to-Work funds, ensuring these funds are used effectively to support workforce development initiatives. This policy outlines the procedures for the utilization of Ticket-to-Work funds by the Northeast Iowa Workforce Board (NEIWDB).

### **Procedures**

1. Proposal and Request Review
  - All proposals and requests for the use of Ticket-to-Work funds must be reviewed and approved by the Finance Committee of the NEIWDB.
  - Proposals should include a detailed description of the project (or items), budget, and expected outcomes.
  - See Criteria for Evaluating Ticket-to-Work Proposals below.
2. Approval Process/Submission Request
  - Upon approval, the NEIWDB Executive Director will work with the requestor on the process outlining the purchase. The requestor will follow policies and procedures outlined within their organization on purchasing the item(s) needed.
  - The requestor will ensure that the invoice and supporting documentation gets to the Executive Director. The Executive Director is responsible for providing that information directly to the Fiscal Agent.

- Appropriate documentation, including but not limited to receipts, invoices, or bills, must accompany the request.
  - Documentation of the committee/board meeting minutes that detail the approved action must be included with the request.
  - The Fiscal Agent will not pay the invoice until all supporting documentation is received.
3. Documentation Requirements
- All requests must include thorough documentation to substantiate the use of funds.
  - Documentation should be clear, accurate, and provide a complete audit trail for all expenditures.

### **Fiscal Agent Review**

The Fiscal Agent will review the submitted request and accompanying documentation. Any discrepancies or missing information will be addressed promptly with the NEIWDB and requestor to ensure completeness and accuracy.

4. Fund Disbursement
- Upon approval, the Fiscal Agent will submit the invoice for payment once all supporting documentation has been received.
  - The NEIWDB will maintain records of all transactions and ensure that the funds are utilized strictly for the approved purposes.
5. Compliance and Accountability
- The NEIWDB is responsible for ensuring that all Ticket-to-Work funds are used in compliance with applicable federal, state, and local laws, regulations, and guidelines.
  - Regular reports on the use and outcomes of the Ticket-to-Work funds will be provided to the NEIWDB to ensure transparency and accountability.
6. Policy Review
- This policy will be reviewed on an as needed basis to reflect any changes in procedures, regulations, or organizational needs.

By following this policy, the NEIWDB aims to maintain a high standard of financial stewardship and transparency in the utilization of Ticket-to-Work funds.

---

## **CRITERIA FOR EVALUATING TICKET-TO-WORK FUND PROPOSALS**

New 2/19/2025

### **Criteria for Evaluating Ticket-to-Work Fund Proposals**

---

The Northeast Iowa Workforce Development Board (NEIWDB) aims to use Ticket-to-Work funds effectively to support innovative initiatives, strengthen outreach, and enhance the work of WIOA core and required partners across Northeast Iowa. These criteria are designed to ensure proposals are purposefully considered and aligned with the broader mission of supporting workforce development efforts in the Northeast Iowa local area.

*Approved on 2/6/2025*

---

## Evaluation Criteria

### 1. Alignment with Local Workforce Goals

- **Purpose:** Does the proposal support the overarching goals of improving workforce development, enhancing outreach, or addressing critical workforce needs in Northeast Iowa?
- **Collaboration:** Does the proposal promote or benefit multiple WIOA core and required partners, strengthening the Northeast Iowa local workforce system?

### 2. Outreach and Community Engagement

- **Impact:** Does the initiative expand outreach efforts or increase awareness of services among job seekers, employers, or other key stakeholders?
- **Inclusivity:** Will the project reach underserved or underrepresented populations within the Northeast Iowa local area?

### 3. Geographic Impact and Regional Flexibility

- **Regional Scope:** Does the proposal outline how its outcomes will benefit multiple counties or key stakeholder groups across the Northeast Iowa local area?
- **Localized Benefits with Broader Potential:** If the proposal is focused on a specific county or smaller community, does it include a plan for scalability or shared learning that can benefit the wider region?
- **Equity of Access:** Does the project address workforce disparities or gaps in underserved or underrepresented areas of Northeast Iowa?

### 4. Value to the Workforce System

- **Cross-Partner Benefits:** Does the proposal provide value or resources that benefit all partners and stakeholders in the local workforce system?
- **Strategic Importance:** Is the initiative addressing a current gap or challenge in the workforce system?



## 5. Innovation and Creativity

- **New Opportunities:** Does the proposal introduce creative approaches to enhance service delivery, outreach, or workforce outcomes?
- **Scalability:** Could the project be scaled or replicated to benefit additional partners?

## 6. Financial Stewardship

- **Cost Justification:** Is the budget for the proposal reasonable and clearly outlined?
- **Impact vs. Cost:** Does the proposal demonstrate how the investment will create a meaningful impact relative to its cost?

## 7. Feasibility and Execution

- **Implementation Plan:** Is there a clear and realistic plan for executing the project?
- **Capacity:** Does the organization submitting the proposal have the capacity to deliver on the proposed outcomes?

## 8. Monitoring and Accountability

- **Outcome Measurement:** Does the proposal include a plan for measuring its success or impact?
- **Reporting:** Are there clear mechanisms for tracking fund usage and providing updates to the NEIWDB?

---

## Suggestions for Fund Utilization

To guide discussions and inspire purposeful use of these funds, the NEIWDB may also consider:

- **Outreach Campaigns:** Initiatives to promote awareness of workforce programs, job opportunities, and available services across Northeast Iowa.
- **Shared Resources:** Investments in tools or materials (e.g., marketing campaigns, outreach events, or technology upgrades) that benefit all core and required partners.
- **Innovative Pilot Projects:** Supporting projects that test new approaches or strategies for improving workforce outcomes in the local area.
- **Capacity-Building Efforts:** Providing training or resources to strengthen the capacity of partners within the workforce system.

- **Balancing Regional and Local Impact:** Supporting initiatives that effectively balance regional benefits with localized innovation, ensuring funds create meaningful, lasting improvements in workforce outcomes throughout the 20-county local area.
- 

#### **Additional Information:**

This criteria will be used to evaluate all proposals, with both committees collaborating to ensure the process is transparent, consistent, and effective.

The Executive Committee will periodically review the criteria, incorporating lessons learned and evolving priorities to ensure they remain relevant and effective. Feedback from the Finance Committee will be central to refining the process overtime.

This collaborative approach ensures that both the Executive and Finance Committee contribute their unique perspectives and expertise, resulting in well-rounded and effective guidance for the use of Ticket-to-Work funds. This emphasizes the broad flexibility of the funds while ensuring they are used strategically to support all partners and workforce initiatives in Northeast Iowa.

#### **TRAVEL**

Updated 11/21/2022, 8/19/2025

Guidelines for Meals, Lodging, and Travel Expenses under WIOA.

#### **General Policy**

NEIWDB Board Members, CEOs, and Staff may be reimbursed for meals, lodging, and travel costs incurred in the performance of administrative and program functions related to WIOA.

Reasonable travel costs necessary to manage the grant, provide oversight, and measure program effectiveness are allowable. Reimbursement must comply with Code of Federal Regulations (CFR) requirements.

Travel costs incurred by the NEIWDB shall be limited to travel directly related to the services performed. For mileage and meal reimbursement, the NEIWDB shall follow the State of Iowa travel policies for Executive Branch employees as set forth in the Department of Administrative Services; State Accounting Policy and Procedures Manual, Section 210, <https://das.iowa.gov/state-employees/state-accounting/travel-relocation/210-travel> and must be consistent with all Iowa Executive Orders currently in effect. For domestic travel to be an allowable cost, it must be necessary, reasonable, allocable, and conform to the Federal law, rules, regulations, and guidance, including 2 CFR 200.475, and current and future USDOL

guidance, policies, and procedures. Lodging costs will be reimbursed if they are actual and reasonable and consistent with the Subrecipient's approved travel policy. All travel must comply with the Fly America Act (49 USC § 40118). WIOA Funds cannot be used for foreign travel, as stated in 20 CFR 683.250(b).

## Guiding Principles

- Reimbursement for travel is authorized for official NEIWDB business within the annual budgetary limits.
- Written permission from the Executive Director or Board Chair is required prior to travel unless attending routine scheduled meetings, committee sessions, trainings, or standard business within the Local Area.
- A travel expense form must be completed for reimbursement requests.
- CEOs may request mileage reimbursement if not provided by their county of service.
- Completed forms should be submitted to the NEIWDB Executive Director/designee for approval and processing; all expenses are also reviewed by the fiscal agent.
- Executive Director's travel expenses outside the Northeast Iowa Local Area must be approved by the Board Chair before submission to the fiscal agent.
- No reimbursement is provided for expenses already reimbursed by other sources ("double dipping" is prohibited and subject to action to recover expenses).
- All expenses must be supported by adequate documentation such as conference/meeting agendas, invoices, etc. (See 2 CFR Part 225).
- NEIWDB is the fiscal recipient and custodian of federal funds, which must be safeguarded and used only for legitimate purposes directly supporting the mission of the board.
- For travel by board, commission, advisor council or task force members refer to **Section 210.245** of the Iowa State Accounting Policy for any additional or specific rules.
- All reimbursements must state the allowable meal reimbursement as well as applicable actual expense incurred by the claimant, and shall not include expenses paid by other individuals, or for the purchase of miscellaneous items which are not needed in the performance of official duties. Reimbursements must be submitted within 30 days of completion of travel.

## Mileage Reimbursement

- Miles are calculated from the representative's domiciled business address to the business site and back.
- Mileage Rate: \$0.50 per mile when using a personal vehicle for board business. The most direct route must always be used. **Procedure 210.130**
- A Google map showing actual miles must accompany the travel reimbursement form.

- At times it may be expedient for an employee to conduct official business enroute to or from his/her residence or official domicile. In these cases, the employee may be reimbursed the extra miles traveled in excess of commuting miles which are traveled to accomplish the task. If an employee travels from his/her residence to a work station not in their official domicile, conducts official state business, and returns to their residence, mileage reimbursement shall be made for miles driven in excess of those driven in commuting to the official domicile.
- If the official domicile and the residence are not identical, mileage reimbursement is only for the excess miles driven above regular commuting miles.
- For additional information please refer to the State Accounting Policy and Procedures Manual, Section 210: <https://das.iowa.gov/state-employees/state-accounting/travel-relocation/210-travel>

## Lodging

- If the event is hosted at a hotel, the negotiated conference rate may be accepted with prior approval if it exceeds the GSA per diem rate.
- Reimbursement is at the single room rate for reasonable hotel costs; convenience and proximity to other venues are considered for reasonableness.
- Lodging outside Northeast Iowa Local Area requires approval at least 14 days in advance.
- The specific local GSA rate should be followed; a written explanation is needed if not adhered to.
- Tips and room service are considered part of per diem and are not reimbursable.
- Fully itemized invoices are required for lodging (no statements or register receipts accepted).
- Lodging costs will be reimbursed if they are actual and reasonable.
- Parking is allowable as long as it is reasonable and necessary.
- Please refer to State Accounting Policy and Procedures Manual, Section 210: <https://das.iowa.gov/state-employees/state-accounting/travel-relocation/210-travel>

## Meals

- Meal and refreshment costs are allowable only when necessary and reasonable for efficient performance and administration of a grant award.
- Meal Reimbursement is limited to \$37 per day (Breakfast: \$8; Lunch: \$10; Dinner: \$19).
- Tips are allowable up to 15% before tax. Per SAE Procedure 210.103(4) tips and applicable taxes are included in the maximum meal per diem rate.
- Room service is reimbursable only if it does not cause the total meal cost to exceed the \$37 daily limit.
- No alcoholic beverages are permitted.

- All meal receipts must be itemized.
- For additional information please refer to the State Accounting Policy and Procedures Manual, Section 210: <https://das.iowa.gov/state-employees/state-accounting/travel-relocation/210-travel>

Examples of allowable meal costs include:

- Meals incidental to meetings or conferences where the primary purpose is to disseminate technical information.
- Meals incurred during meetings or conferences with external customers or colleagues outside the entity's organization.
- Working lunches with adequate documentation justifying the meeting during mealtime hours.

### **Miscellaneous Reimbursements**

- All disbursements of WIOA funds, including miscellaneous expenses, must be documented, reasonable, and allowable to one or more grants.
- Miscellaneous expenses should be claimed under "miscellaneous expense" on the travel form with supporting receipts for each transaction.
- Actual receipts must be attached to the travel payment to receive reimbursement for other miscellaneous expenses. Only certain miscellaneous expenses are allowable.
- Receipts are required for:
  - Admission tickets
  - Registration receipts
  - Taxi, Uber, Lyft services
  - Tolls, garage, and parking fees

### **Travel Request Process and Procedure**

- Expenses will not be reimbursed unless the Expense Form is submitted.
- The Expense Form must be submitted within 30 days of the trip and filled out completely.
- Delays in submission will result in delays in processing; timelines may be extended.
- The Board Chair/Executive Director verifies the form and receipts, approving within 5 business days.
- The Executive Director emails the form to the Fiscal Agent for processing.
- All travel expense payments will be processed and paid by the Fiscal Agent within 30 days of receipt.

## TRAVEL EXPENSE FORM

(Updated 8/16/2025)

Submitted by:		Date:	
Dates of Travel:		Destination:	
Representatives for Whom Reimbursement is Being Requested:			
Reason for Travel:			
<b>All expenses must be submitted with itemized receipts and supporting documentation. Mileage reimbursement requests must include a Google Maps printout (or equivalent) showing the route traveled.</b>			
<i>Reimbursements:</i>			
	# of Receipts	Amount	
Mileage - \$0.50/mile:		\$	
Meals – Maximum \$37/day:		\$	
Transportation (Uber, Taxi, etc.):		\$	
Lodging:		\$	
Airfare/Baggage:		\$	
Miscellaneous (Specify below):		\$	
	<b>Total Reimbursement:</b>	\$	
Executive Director/Board Chair:	<input type="checkbox"/> Approve		<input type="checkbox"/> Not Approved
Signature:		Date:	
Are there any credit card charges associated with this trip? If yes, please list related charges and amounts:			
Additional Comments:			

## WHISTLEBLOWER

10/11/2023

### **Purpose**

The Northeast Iowa Workforce Development Board (NEIWDB) recognizes the importance of maintaining an ethical and compliant work environment. This policy encourages employees, volunteers, and affiliated individuals to promptly report any violation of policy, procedure, ethics, illegal activities, or other misconduct by employees, volunteers, or others associated with the organization. The NEIWDB is committed to ensuring that individuals who report such violations in good faith are protected from harassment, retaliation, or adverse employment consequences. Additionally, this policy establishes procedures for reporting violations and conducting thorough investigations to address any reported concerns.

### **Reporting Process**

Reports of violations or suspected violations can be made directly to the Executive Director, Board Chair, Vice-Chair, or any special committee constituted by the NEIWDB to receive and process confidential information.

- If the reported activity or misconduct involves the Executive Director, the report should be directed to the Board Chair or Vice-Chair.
- Violations or suspected violations may be submitted confidentially by the complainant or anonymously.

### **Confidentiality**

The NEIWDB will make every effort to keep reports of violations or suspected violations confidential to the extent possible while ensuring an adequate investigation can be conducted. Only those directly involved in the investigation and decision-making will be informed about the reported violation or misconduct.

### **Acknowledgement of Receipt**

Upon receiving a complaint, the designated recipient will acknowledge receipt of the reported violation or misconduct within five business days.

### **Investigation and Corrective Action**

The appropriate authority will promptly and thoroughly investigate all reports. If the investigation reveals a violation has occurred, appropriate corrective action will be taken promptly based on the findings and in accordance with the organization's policies and procedures. Corrective Actions may include but are not limited to, retraining, counseling, warnings, disciplinary actions, and in severe cases termination of employment.

### **Whistleblower Protection**

No individual who makes a good faith report of a violation shall suffer harassment, retaliation, or adverse employment consequences due to their report. Any employee, board member, or

volunteer found to have retaliated against someone who has reported a violation in good faith will be subject to disciplinary action, up to and including termination of employment.

### **Non-Retaliation Assurance**

The NEIWDB will actively promote an environment that discourages retaliation against individuals who report violations or misconduct and will take appropriate measures to prevent and address any potential acts of retaliation.

## **TITLE IB PROGRAMS**

Northeast Iowa LWDA always follows State ePolicy in addition to the approved local policies.  
<https://epolicy.iwd.iowa.gov/Policy/Home>

### **ADDITIONAL ASSISTANCE**

NEIWDB identifies the following categories for Youth Needing Additional Service in addition to those outlined in State Policy:

- Father of an unborn child
- Youth with no work history

### **ADULT MENTORING**

The following is the selection and screening process for Adult Mentors in the Northeast Iowa Local Area:

- Mentors must be at least 25 years of age.
- Mentors must pay for and complete a background check. Background check must be within 90 days before beginning mentorship.
- Mentor must complete a mentorship application, confidentiality statement, a rights and responsibilities agreement and provide background check results.
- Mentors must complete an interview with a youth program career planner or with the Youth Standing Committee.
- Applications will be good for 90 days.

The NEIWDB will screen the interested mentor based on application, background check, and interview. NEIWDB may partner with other Partner Agencies for Adult Mentoring Services with approval from LWDB. Any partner agencies screening process will be reviewed by the LWDB for determination of adequacy.

### **CLOSURE OF SERVICES DUE TO FRAUD**

In the event an individual is found to have committed, or attempted to commit, fraud to receive services, the individual will be immediately notified by mail. The notification letter will include an explanation of the initial determination and the individual will have 30 days to respond from the date of the letter. At the conclusion of the 30-day response period, a final determination of



services will be made, and written notification will be sent to the individual within 5 business days following the 30-day response period.

If it is found the individual did commit fraud to receive services, the participant's activities must be immediately closed. All circumstances related to the fraudulent act or attempt to defraud, along with the last date of services, must be documented and maintained in the IowaWORKS system.

#### DISLOCATED WORKER PROGRAM ELIGIBILITY DUE TO ECONOMIC CONDITIONS

If a self-employed individual becomes unemployed due to general economic conditions or natural disasters in the community in which the individual resides, the individual may be eligible to participate in the Dislocated Worker Program.

To be eligible based on economic conditions, one of the following factors must be present:

1. Individual resides in an area of substantial unemployment of a rate of 6.5% or higher.
2. Individual resides in a High Poverty area of 25% or higher based on US Census data.

To be eligible based on a natural disaster, the area in which the individual resides must have a disaster proclamation issued by the Governor of Iowa.

#### ECONOMIC SELF-SUFFICIENCY

NEIWDB adopts the State Standard for Economic Self-Sufficiency.

#### ELIGIBILITY DETERMINATION – OTHER RESPONSIBLE ADULTS (PROGRAM PARTICIPATION FOR MINORS)

The Northeast Iowa Local Area does not authorize any additional responsible adults outside of those mentioned in the State Policy to authorize program participation for minors. State policy states that another responsible adult may include the following:

- A relative with whom the individual resides,
- An adult who has been delegated custodial or administrative responsibilities in writing, either temporarily or permanently, by parents or by an appropriate agency,
- An agency or organization representative who is in a position to know the individual's circumstances (i.e., that they could not get a parent's or guardian's signature authorizing participation), for example, a clergy person, a schoolteacher or other school official, a probation or other officer of the court or foster parent,
- A representative of an agency which provided support services to the individual and who is aware of the individual's circumstances (i.e., that they cannot get a parent's or guardian's signature authorizing participation), for example, a social worker, a homeless shelter official, a child protective worker, a health clinic official; or
- Other responsible adults to be appropriate to authorize the individual's participation, as defined in policy by the Local WDB.

## FOLLOW-UP SERVICES

Mod 9/8/2025

### General Requirements (All Programs)

Under the Workforce Innovation and Opportunity Act (WIOA), follow-up services must be available to all participants enrolled in **Adult, Dislocated Worker, and Youth** programs.

- Services must be available **through the end of the 4th quarter after the exit quarter**.
- With **Local Workforce Development Board (LWDB) approval**, additional services may be extended beyond this period.
- The **type, duration, and intensity** of follow-up services depend on the individual's needs.
- Follow-up services are designed to support participants in retaining employment, achieving wage growth, pursuing education and training, and progressing in their careers.
- These services must be documented in the participant's in **IowaWORKS case notes and follow-up tab**.
- Follow-up services are **not** merely contacts to collect performance documentation, but rather meaningful services that promote success.
- If a participant **declines follow-up services**, staff must record the request in case notes and cease further contact.

### Adult and Dislocated Worker Programs

Follow-up services must be made available to all Adult and Dislocated Worker participants after exit.

- Services are available for **up to 12 months / 4 quarters after exit**.
- Follow-up support may include:
  - Career planning and development
  - Educational planning
  - Leadership development
  - Adult mentoring
  - Work-related peer support groups
- All requests and services must be documented in **IowaWORKS system quarterly following exit. This must be documented in case notes and Follow-Up tab**, along with any relevant performance outcomes.

## Youth Programs

Follow-up services for youth are **required** for a minimum of **12 months following exit**. These services are critical to ensuring success in employment, post-secondary education, and training.

- Services must be entered into the **IowaWORKS system quarterly** following exit. **This must be documented in case notes and Follow-Up tab.**
- Documentation requirements:
  - All contacts and attempted contacts must be entered.
  - At least **two attempts** to contact a youth who is unavailable must be recorded.
  - Services may end after **four unsuccessful attempts within 90 days for each quarter following exit**, with case notes documenting the contact methods and dates.
  - If a youth cannot be located, this must be clearly documented.

Examples of youth follow-up services include:

- Supportive services (to help achieve employment goals)
- Adult mentoring
- Financial literacy education
- Career counseling and exploration
- Activities supporting transition to postsecondary education/training

## Exceptions

- Follow-up services may continue **beyond the 12-month period** at the discretion of the LWDB.
- Extensions must be requested through the **Executive Director to the LWDB**, with justification.
- The **type, intensity, and duration** of extended services must be based on the needs of the individual participant.

## GEOGRAPHICAL PREFERENCE

Updated 9/11/2023

The Geographical Preference for Northeast Iowa is that the participant must be a resident within the following counties: Allamakee, Black Hawk, Bremer, Buchanan, Butler, Cerro Gordo, Chickasaw, Clayton, Delaware, Dubuque, Fayette, Floyd, Franklin, Grundy, Hancock, Howard, Mitchell, Winnebago, Winneshiek, and Worth counties or within the local School District

boundaries of these counties. For individuals living outside of these boundaries who request assistance from Northeast Iowa LWDA, approval must be requested/received from the LWDA of residence prior to enrollment and documented in the data management system. This approval can come from the Title I Director or the LWDA Executive Director.

## IN – DEMAND OCCUPATIONS DETERMINATION & USAGE

10/11/2023, 8/19/2025

### Purpose

The purpose of this policy is to disseminate guidelines concerning the identification and utilization of in-demand occupations by the Northeast Iowa Workforce Development Board (NEIWDB) as mandated under Workforce Innovation and Opportunity Act (WIOA) Section 3(23)(B).

### Background

According to WIOA regulations, local workforce boards are required to identify occupations that are in demand within their Local Areas. This policy outlines the process to be followed by NEIWDB in developing and maintaining a local list of increasing and decreasing occupations in the area.

**Definition:** “In-demand refers to occupations, industry sectors, or career pathways that have been identified as emerging, growing, and a priority for local workforce partners, or that offer the best job prospects due to workforce needs and employer hiring demands. Utilization of WIOA Title I training funds is limited to customers enrolled in state-approved eligible training programs that lead to entry into an occupation on the approved in-demand list.

### References

This policy is based on the following references:

- Workforce Innovation and Opportunity Act (WIOA) Section 3(23)(B)
- WIOA Sec. 134(c)(3)(F)(v)
- WIOA Sec. 134(c)(3)(G)(ii)(V)(aa)
- WIOA Sec. 134(c)(3)(G)(iii)
- Subsequent guidance

### Determination of Targeted Industries

The Northeast Iowa Workforce Development Area has identified target sectors based on anecdotal evidence from employers, studies, and analyses conducted by workforce partners, such as the Iowa Workforce Development in-demand lists and Lightcast’s economic overview. The power sectors identified are as follows:

- Healthcare and Social Assistance
- Manufacturing
- Educational Services
- Transportation and Warehousing,
- Accommodation and Food Services
- Finance and Insurance
- Construction

### **In-Demand Occupations**

The NEIWDB must establish, maintain, and review, and annually update a list of existing or emerging occupations that fulfill the following criteria:

- Belong to sectors with a high potential for sustained demand or growth in the local area.
- Align with target industry clusters within the local area.
- Support economic growth priorities.
- Address industry-specific shortages.

“In-demand occupation standard” used to determine eligible occupations for training activities considers various factors, such as:

- 3-digit Standard Occupational Classification (SOC) code from Labor Market Data available through Lightcast.
- Projected 2% job growth based on 3-year projections.
- Earns a self-sufficiency wage as defined by the NEIWDB
- Other factors that can be taken into consideration include:
  - turnover rates
  - minimum skills required
  - average entry-level wages for the occupation.

This policy enables NEIWDB to:

- Extend services to low-income workers and facilitate their career path to self-sufficiency.
- Prioritize high-wage industry sectors and occupations for training.
- Make job-training programs leading to self-sufficiency a priority.

### **Usage of the In-Demand Occupation Policy**

The Title I Service Provider will use the NEIWDB In-Demand Occupation Policy to determine the appropriate training program for participants seeking employment in a demand occupation. Training for a demand occupation may be targeted to employment status within or outside Local Area boundaries. Participants may request training for an occupation in demand in another area, provided an adult or dislocated worker is willing to relocate or commute for the approved training.

To establish a relationship between an occupation and an industry sector deemed “related to” an in-demand industry sector, the NEIWDB will refer to the O\*Net online website as a resource.

### **Exceptions**

In specific circumstances, exceptions to the attached in-demand industry list may be considered. The request for an exception must be submitted in writing to the NEIWDB Executive Director. The request must include the occupation for which training is requested, the basis for the exception request with supporting documented evidence, and whether the request is temporary or permanent. The request should be submitted before any training expenditure related to it is reviewed. The NEIWDB Executive Director will review the request with the Board Chair and respond in writing within ten (10) days.

### **Availability of the In-Demand Occupation List**

The NEIWDB’s In-Demand Occupation List will be made accessible at the American Job Centers in the Northeast Iowa Local Area and on the NEIWDB website.

### **Annual Reporting**

An updated report on the In-Demand Occupation List will be presented to the NEIWDB during the last meeting of each program year, or more frequently if necessary. During this time the board may make exceptions for any occupation they feel should be included on the in-demand list but may not reach every criterion listed above. The vote on the report will be documented in the official minutes and exceptions noted.

### ***Northeast Iowa In-Demand Industries***

In-demand refers to occupations, industry sectors, or career pathways that have been identified as emerging, growing, and a priority for local workforce partners, or that offer the best job prospects due to workforce needs and employer hiring demands. Utilization of WIOA Title I training funds is limited to customers enrolled in state-approved eligible training programs that lead to entry into an occupation on the approved in-demand list.

<b>Industry Description</b>	<b>NAICS Code</b>
Nursing and Residential Care Facilities	623
Educational Services	611
Ambulatory Health Care Services	621
Social Assistance	624
Hospitals	622
Professional, Scientific, and Technical Services	541
Total Self Employed and Unpaid Family Workers, All Jobs	671
Warehousing and Storage	493
Insurance Carriers and Related Activities	524
Local Government, Excluding Education and Hospitals	930
Specialty Trade Contractors	238
Accommodation, including Hotels and Motels	721
Transportation Equipment Manufacturing	336

Religious, Grantmaking, Civic, Professional, and Similar Organizations	813
Food Services and Drinking Places	722
Food Manufacturing	311
Fabricated Metal Product Manufacturing	332
Truck Transportation	484
Amusement, Gambling, and Recreation Industries	713
Construction of Buildings	236
Chemical Manufacturing	325
Management of Companies and Enterprises	551
Machinery Manufacturing	333
Administrative and Support Services	561
Wood Product Manufacturing	321
Credit Intermediation and Related Activities	522
Couriers and Messengers	492
General Merchandise Retailers	455
Personal and Laundry Services	812
Securities, Commodity Contracts, and Other Financial Investments and Related Activities	523
Merchant Wholesalers, Durable Goods	423
Motor Vehicle and Parts Dealers	441
Electrical Equipment, Appliance, and Component Manufacturing	335
Food and Beverage Retailers	445
Support Activities for Agriculture and Forestry	115
Beverage and Tobacco Product Manufacturing	312
Gasoline Stations and Fuel Dealers	457
Repair and Maintenance	811
Plastics and Rubber Products Manufacturing	326
Health and Personal Care Retailers	456
Rental and Leasing Services	532
Real Estate	531
Heavy and Civil Engineering Construction	237
Transit and Ground Passenger Transportation	485
Building Material and Garden Equipment and Supplies Dealers	444
Support Activities for Transportation	488
Waste Management and Remediation Services	562
State Government, Excluding Education and Hospitals	920
Private Households	814
Telecommunications	517
Performing Arts, Spectator Sports, and Related Industries	711
Museums, Historical Sites, and Similar Institutions	712
Paper Manufacturing	322
Computer and Electronic Product Manufacturing	334
Rail Transportation	482
Publishing Industries	513
Computing Infrastructure Providers, Data Processing, Web Hosting, and Related Services	518
Utilities	221
Leather and Allied Product Manufacturing	316
Printing and Related Support Activities	323
Motion Picture and Sound Recording Industries	512
Broadcasting and Content Providers	516

## In-Demand Industry Request for Exception

This is a request for an exception to the In-Demand Industry Policy list. This form will be used for consideration of the documented industry to be added to the current In-Demand Industry List.

Date of Request:	
Contact Name:	Contact Title:
Contact Phone:	Contact Email:
Industry Title Requested:	

### Occupation Information

Occupation Title:	
Primary O*Net Code:	Additional O*Net Codes:

### Supporting Justification

This section is used to provide a description of the justification for adding the industry to the In-Demand Industry List. Provide as much detail as possible to assist in the review process to determine the need for the addition.

--

### Additional Supporting Information

Provide a narrative describing the need to support current and future job openings or increased wages that may not be reflected in the labor market information and data utilized for the current in-demand industry list. Attach additional information and supporting documentation to this request as evidence.

--

### Exception Request Approval



Planning and Operations Committee Chair Signature:		Date:
NEIWDB Chair Signature:		Date:

Submit the completed form to: Taylor Williams, NEIWDB Executive Director at [taylor@northeastiawdb.org](mailto:taylor@northeastiawdb.org)

## INDIVIDUAL TRAINING ACCOUNTS (ITA)

Updated 3/8/2023, 9/11/2023, 11/8/2023, 4/7/2025, 6/25/2025, 10/7/2025

Individual Training Accounts are the standardized methodology by which a participant's training costs are funded. It is the mechanism through which funds will be used to make payment only for Adults, Dislocated Workers and Out-of-School Youth (OSY) ages 16-24 for purchasing training services from eligible training providers.

Participants have the opportunity to select an eligible training provider, maximizing participant choice, in addition to consultation from the participant's case manager. The participant will be referred to the selected training provider unless program funds are insufficient or exhausted. The enrollment selection process for an ITA will follow the same process as for selection into WIOA.

ITAs are not entitlements and shall be provided to eligible participants based on individualized assessment of the person's job readiness, employment, and training needs, financial, social, and supportive needs, labor market demand, and potential for successful completion, as documented on the participant's Individual Employment Plan (IEP). For residents of the Northeast Iowa Local Area, the actual implementation of an ITA will involve the Adult or Dislocated Worker Service Providers. ITAs are subject to cost limitations listed in the Occupational Skills Training (OST) and Educational Assistance (EST) sections but are also listed below.

ITAs will be issued only for approved training programs, and only after career counseling (including Labor Market Information) has been provided by the case manager and clearly documented.

### Financial Needs Analysis

#### 1. Purpose

A Financial Needs Analysis will be completed for each participant to establish the level of

WIOA ITA funding available. The Analysis ensures that WIOA funds are used as the payer of last resort and that participants access all other sources of financial aid before WIOA funds are awarded.

## **2. Calculation**

The participant's ITA amount will be calculated as follows:

**Total Allowable Training Costs (tuition, fees, books, required supplies, testing/licensing fees)  
– Other Grants/Scholarships/Financial Aid (excluding loans and VA benefits)  
= Unmet Training Need**

The unmet training need will establish the maximum annual ITA amount available, subject to ITA program caps.

## **3. Annual and Semester Review**

- The Financial Need Analysis must be updated at initial ITA issuance and at the start of each semester/quarter using the most current financial aid award information.
- Adjustments may be made to ITA levels each semester to reflect changes in cost, financial aid, or participant circumstances.
- Participants must provide current billing statements, award letters, or other verification of costs and aid received.

## **4. Documentation**

- A completed Financial Needs Analysis worksheet will be maintained in the participant's file.
- Documentation of other financial resources reviewed and applied will be uploaded into the case management system.
- Case notes must summarize the determination process and calculation of unmet need.

## **Coordination of WIOA Training Funds and Other Federal Assistance**

WIOA Service Providers must consider the availability of other sources of grants, excluding loans, to pay for training costs so that WIOA funds are used to supplement but not supplant other sources. WIOA funding for training is limited to participants who are unable to obtain grant assistance from other sources to pay the cost of their training or require assistance beyond that

available under grant assistance from other sources to pay the costs of such training. In making the determination, WIOA Service Providers may take into account the full cost of participating in training services, including the cost of supportive services and other appropriate costs.

As stated in WIOA Final Rules, and TEGL 19-16, Department of Veterans Affairs benefits for education and training services are not included in the category of “other resources of training grants” listed in 20 CFR sec. 680.230(b). Therefore, veterans and spouses are not required to first use any available benefit entitlements associated with their military service before being considered eligible for WIOA-funded training, and Service Providers are not required to consider the availability of those funds.

### **Cost Limitations**

Total payments on an ITA may not exceed \$8,000. Maximum for OST - \$6,000 and \$2,000 for EST services per participant per program year; however, may be increased in extraordinary circumstances by up to \$500.00 by the NEIWDB Executive Director when unusual circumstances occur.

ITAs will only be issued to students who possess a high school diploma, GED or equivalent. Exceptions to this policy include CDL and Certified Nurse Aide programs.

An ITA must be completed and approved by the service provider before the participant begins training.

Participants must maintain satisfactory progress/grades throughout the training program. **A copy of grades/transcripts must be uploaded each semester/quarter prior to issuing ITA.**

### **INELIGIBILITY**

On the date that an individual is found ineligible to receive services, the individual will be mailed a letter stating why they are ineligible and providing them 30 days to respond to correct the ineligible status. A final determination will be made after the 30 days have expired and the individual will be mailed a letter within 5 business days stating the final determination of services.

### **LAPTOP PURCHASE**

**New 9/11/2023**

Laptop purchases for Title I Participants will not be allowed. It is the decision of the NEIWDB that participants who require a laptop will have access to computers in the local AJC, public libraries or at the training facility. Under certain circumstances a request for laptop approval will be submitted to the NEIWDB Executive Director. Requests for laptop approval must be documented in the participant record in IowaWORKS. If approved, the NEIWDB Executive

Director will case note the approval.

## SELF-SUFFICIENCY

NEIWDB will follow State ePolicy for Economic Self-Sufficiency:

<https://epolicy.iwd.iowa.gov/Policy/Index?id=211&Version=1>

For the purposes of the WIOA Title I Adult and Dislocated Worker programs, Iowa defines economic self-sufficiency as the minimum level of income an individual must earn in order to meet the most basic expenses without public or private assistance. Family income equal to or exceeding 100% of the Lower Living Standard Income Level (LLSIL) constitutes the state standard.

Local Workforce Development Boards (WDBs) who choose to define their own higher standard must develop, within their local policies, economic self-sufficiency standards for local factors, or activities to adopt, calculate, or commission for approval, economic self-sufficiency standards for the local areas that specify the income needs of families, by family size, the number and ages of children in the family, and sub-state geographical considerations.

## UNDEREMPLOYED INDIVIDUALS

Updated 04/03/2023

NEIWDB outlines the following criteria to qualify as an Underemployed individual under the Adult and Dislocated Worker Programs:

Underemployed individuals may include:

- Not employed in a career of choice, or a low skilled position;
- Individuals employed less than full-time who are seeking full-time employment;
- Individuals who are employed in a position that is inadequate with respect to their skills and training;
- Individuals who are employed who meet the definition of low-income individual in WIOA sec. 3(36); and
- Individuals who are employed, but whose current job's earnings are not sufficient compared to their previous job's earnings from their previous employment. Must be at 80% or below previous earnings.

For those that qualify as underemployed after approval from the **Executive Committee**, documentation needs to be uploaded and case noted in the IowaWORKS system.

## UNLIKELY TO RETURN ELIGIBILITY

10/11/2023

### Purpose

This policy outlines the Northeast Iowa Workforce Development Board's (NEIWDB) definitions and establishes the criteria for Unlikely to Return to a previous industry or occupation for determining eligibility for the Title I Dislocated Worker Program.

### **Background**

WIOA Section 3(15)(A)(iii) defines the term dislocated worker and identifies the dislocated worker categories individuals may qualify for WIOA services. Unlikely to return to a previous industry or occupation is an eligibility requirement for Dislocated Worker Category 1 and Category 2. § 680.130 allows Local Workforce Development Boards to establish policies to use in determining an individual's eligibility as a Dislocated Worker, including unlikely to return.

### **Definition**

Definition: "Unlikely to Return"- May be defined in terms of economic conditions, job availability, family, personal or financial circumstances that may affect the likelihood of an individual returning to his or her previous industry or occupation for employment.

### **Criteria for "Unlikely to Return"**

NEIWDB has determined a Dislocated Worker is unlikely to return to a previous industry or occupation if one of the following criteria is met:

- Separating service members.
- Individuals who have worked in a declining industry or occupation, as documented on state or locally developed labor market statistic lists of such industries or occupations.
- Individuals who cannot return to their previous industry or occupation because they have physical or other limitations, which would prevent reentry into the former industry or occupation.
- Individuals that may have worked seasonally can be considered unlikely to work in a previous industry or occupation as a temporary or seasonal worker, for a variety of reasons such as:
  - Change in a family situation that requires higher income.
  - Disability that precludes returning to the same industry or occupation.
  - Natural disaster that results in lost wages.
  - Loss of agricultural land.
  - Mechanization.
  - Any significant variance to normal seasonal employment patterns resulting in uncertain return-to-work dates.
- Individuals laid off on a temporary basis without a specific recall date. An individual is considered as likely to return to a previous industry or occupation if they have a specific recall date from the employer of the qualifying dislocation that is within 12 weeks of termination or layoff. Note: Individuals who have been temporarily laid off due to COVID-

19 are eligible under this condition granted they do not have a recall date within 12 weeks of the layoff.

#### **Allowable Source Documentation**

- DD-214 with other than dishonorable discharge
- Labor Market Information showing occupation in decline
- Documentation of physical or other limitations restricting return to previous occupation
- Documentation of seasonal work and change in family situation, disability, natural disaster that resulted in lost wages, loss of agricultural land, or mechanization
- Documentation of layoff from seasonal work with no recall dates

#### **References**

Workforce Innovation and Opportunity Act (WIOA) Final Rules WIOA Sec 3(15)(A)(iii), 20 CFR § 680.130, § 680.660, Workforce Services Policy Chapter 8 WIOA Title 1B Programs

## PARTICIPANT SERVICES

Northeast Iowa LWDA always follows State ePolicy in addition to the approved local policies.

### CASE NOTES

New 12/12/2025

#### Purpose

The purpose of this policy is to establish uniform standards for documenting case notes in IowaWORKS for all WIOA Title I programs (Adult, Dislocated Worker, and Youth). Case notes serve as the official record of services provided, participant progress, and the decision-making process. They ensure compliance with federal and state requirements, provide transparency for monitoring, and support continuity of services.

Case notes also serve as the primary documentation of coordination among WIOA core and required partners, ensuring transparent communication, co-enrollment alignment, and efficient use of multiple funding streams (“braided” service delivery).

This policy aligns with federal guidance at **20 CFR 683.300(a)**, requiring accurate, timely and complete documentation of participant records to support eligibility, services, and outcomes.

#### Policy Statement

All staff providing WIOA Title I services must maintain accurate, timely, clear, and complete case notes. Case notes are mandatory for all services and interactions with participants and must demonstrate a clear connection to the participant’s goals, barriers, and outcomes.

#### Standards for Case Notes

Case notes must be:

- **Clear:** Easily understood by someone unfamiliar with the participant.
- **Concise:** Includes only relevant details in a straightforward manner.
- **Useful:** Follows the “Who, What, Where, When, Why, and How” format.
- **Relevant:** Directly related to participation in WIOA Title I.
- **Timely:** Entered within **10 calendar days** of the service or interaction.
- **Identifiable:** Includes accurate date/time stamps and staff entry identification.

#### Required Elements

All case notes must demonstrate continuity of service, including how the activity or contact supports the participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS). When applicable, note any coordination with partner programs (e.g., IVRS, Title II, SNAP E&T, etc.) to document service integration as required under **WIOA Sec. 121(b)**.

Each case note must contain:

1. **Description of the interaction** (context of the contact).
2. **Purpose** of the interaction.
3. **Content** of the conversation or service provided.
4. **Outcome** of the interaction, including goals met or challenges identified.
5. **Plans/Next Steps** agreed upon by staff and participant.

Case notes documenting services must answer:

- What service was provided?
- When was it provided?
- Why was it provided?

When documenting problems or barriers, case notes must also include planned or actual solutions.

### **Case Note Types**

Staff must document case notes in the following order and categories, as applicable:

- Intake and Eligibility
  - Initial Individual Information: Case notes must clearly capture who the participant is and why they are seeking services. This includes relevant household information, work and education history, and any barriers that may impact eligibility or service planning. Documentation should provide a clear contextual picture of the individual's background and needs.
- Eligibility Determination
- Enrollment
- Assessments (OBA, ISS/IEP)
- Training and Services (OST, WEP, TRN, Support Services, Incentives)
- Progress and Updates



- Partner Services and Referrals
- Exits and Follow-up

### Rules for Documentation

- Do not use personal opinions, judgments, or irrelevant information.
- Use professional and respectful language at all times.
- Opinions relevant to service decisions must be clearly identified as opinions.
- Case notes must never contain discriminatory or offensive language.
- Case notes must be written in a neutral, factual tone, and in the third person. Avoid abbreviations not commonly used statewide. All acronyms must be defined on first use.
- “Batching,” defined as entering multiple backdated case notes for past services in a single session, is a programmatic violation per monitoring standards. Each note must be dated contemporaneously with the service delivery date and entry date.

### Timeliness and Frequency

- Case notes must be entered in IowaWorks within 7 business days of the service of contact whenever possible, and no later than 10 calendar days, consistent with best practice
- Active participants must have documented contact at least every 30 days for Youth and 90 days for Adult and Dislocated Worker. Contacts must demonstrate active case management, not administrative updates only. Consultants are required to engage in substantive contact with participants to discuss progress, goals, barriers, and next steps. Uploading documents—such as Credentials, MSGs, or other paperwork—does **not** constitute a contact and cannot be used as evidence of participant engagement or progress. All contacts must reflect meaningful interaction that supports the participant’s ongoing case management and service strategy.
- Workforce Consultants must run regular reports to ensure compliance with these standards.

### Documentation for Specific Services

Case notes must include required details for specific services such as:

- **Occupational Skills Training (OST):** justification for training, program details, schedules, transcripts, financial aid status, School and program name, planned start and planned end dates.

- **Support Services:** barrier addressed, type of assistance, cost, and supporting documentation, planned start and end dates.
- **Incentives (Youth only):** milestone achieved, date, type, and uploaded verification.
- **Work Experience (WEP):** site details, duties, hours, wages, start and end date, and signed contract.
- **Job Search Assistance:** employer(s) contacted and purpose of the contact.
- **Workshops/Group Activities:** workshop name, date, and next steps.
- **Exit Case Notes:** last date of service, confirmation of no future services, ~~and~~ exit reason (including exclusions, if applicable) and outcomes.

### Cross- Program Coordination and Partner Referrals

WIOA Title I service delivery occurs within an integrated system of core and required partners. Case notes must document when coordination, referral, or co-enrollment occurs with another program or partner agency.

### Requirements for Partner Coordination Case Notes:

- Record the name of the agency or partner, the purpose of the referral or coordination, and the expected follow-up date.
- Document any information shared (within allowable confidentiality limits) and note whether participant consent for information exchange has been obtained, as required under privacy regulations (20 CFR 683.300(b)).
- When services are jointly planned, the case note must identify which program or partner is funding or providing each service to demonstrate collaboration and avoid duplication.
- A follow-up case note must be entered to confirm the referral outcome or the result of partner coordination.
- Partner and referral case notes should show how services are braided or sequenced to meet participant goals outlined in the IEP/ISS.

This documentation supports system integration under **WIOA Section 121(b)**. Accurate partner coordination notes ensure accountability, prevent duplication of effort, and strengthen alignment with local MOUs and cooperative agreements.

### Compliance

Supervisors must review case notes quarterly for accuracy, timeliness, and alignment with service entries. Findings must be documented in internal monitoring logs. Noncompliance may

result in staff retraining or corrective action consistent with local policy and IWD monitoring expectations.

Failure to comply with this policy may result in programmatic findings during monitoring or audits. Supervisors will review case notes regularly to ensure accuracy, timeliness, and completeness.

## **PARTS OF A CASE NOTE**

### ***Subject Line***

The subject line of the case note should be:

A. The name(s) of the service(s) provided

**OR**

B. A summary of what happened if a service was not entered

*Example of subject line and case note with no service:*

***Subject line:*** Appointment rescheduled

***Body:*** Warren called today to state he needs to reschedule our meeting for 03/11/20 due to illness at home. We will be going over career exploration activities, I sent him the link to ONET's interest profiler and said he could take care of that at home and we can go over the results when he comes in on the 11th.

### **Initial Case Note for Intake/Eligibility:**

This case note is critical as it documents registration into IowaWORKS and will be reviewed during monitoring and data validation activities. This case note must include the following:

- Who is this individual, provide background (household, where they live, etc.)
- Why the participant is being enrolled into WIOA Title I (Adult, DW, Youth).
- Participant has a completed work registration. This includes up to date contact information, highest education, work history (previous 10 years or all work history if fewer than 10 years) with wage information. This will be completed prior to creating a Title I Application (Eligibility Assessment).
- How they are eligible for the Title I Program.
- Program specific eligibility
- Adult – Income (what documents used)
- Dislocated Worker – How are they eligible and if needed – documentation for Unlikely to Return.
- Youth – In/Out of School determination and how they are eligible.

- Next Steps (OBA, etc.)

#### **Sample Note: Initial Case Note for Intake/Eligibility**

*Jess is a 26-year-old single parent with 1 dependent (Anna – 8 years old). She lives in Mason City.*

*Jess is currently employed part-time at Franny's Restaurant, working 25 hours per week as a cook at \$10.00 per hour. Prior work history has been updated and is current in IowaWORKS.*

*Jess came into the office today to complete the intake process. She provided all required documentation needed to determine eligibility. Jess meets eligibility requirements for Adult services based on eligibility for SNAP benefits within the last 6 months. Eligibility documentation was scanned and uploaded in the application, and hard copies were added to the participant's file.*

*She is not a Veteran.*

*Jess expressed an interest in training and is considering LPN. Her highest level of education is High School Diploma with some college credits. Jess is scheduled to the CASAS next week. Results will be shared with Workforce Consultant to determine basic skills deficiency and the need to take additional classes to complete pre-requisites for the LPN program. Referral to PACE program will be sent as a result of this screening.*

*Options for training were discussed and the ETPL State Provider link was reviewed with her to ensure she is well informed of eligible training providers and programs that are available. Jess was provided a link to the ETPL State Provider List and encouraged to review all options for training.*

*The WIOA application was completed today, and signatures were obtained for all documents. Participant responsibilities regarding monthly contact and follow-up requirements were reviewed with her.*

#### **Sample OBA Assessment and Testing Note:**

*Jess completed assessment and testing. Basic Skills Screening results reflect there are no Basic Skills deficiencies. She completed My Next Move – Career Interest and CASAS. Results show that Math at 11th grade and Reading at 12th grade. Interest Profile shows Realistic (24), Investigative (21), Artistic (9), Social (20), Enterprising (16) and Conventional (23). A review of the jobs that match those interest goals confirms that her interest in LPN matches her desired career pathway. Results uploaded to this case note.*

*A conversation showed and revealed the highest level of education is High School Diploma with some college credits. She has a work history which includes house cleaner, cook, and waitress.*

*Various transferable skills she identified from the Transferable Skills Checklist are: The ability to operate a computer, effective communicator, problem-solver, sensitive to others, patient, goal-setter, attention to detail, organized, ability to maintain a budget. She is a single parent and has one dependent.*

*After a review of the assessment and test results, plus a review of the information obtained from our interview, it has been determined no suitable employment is available, even with additional employment and case management services. Barriers to employment include limited work history, lack of higher education, lack of transferable skills needed for occupational goal, single parent, and low income, which are preventing her from reaching self-sufficiency. Jess has been advised that additional training is recommended. A review of training options was discussed, and it has been determined that the results from her assessments support her selection of training in the area of nursing (LPN).*

*After reviewing her options on the State Approved List and completed the consumer choice worksheet (attached) and has decided to pursue a certificate in Licensed Practical Nursing (LPN) at NICC. Labor Market Information from ONET was shared with Jess and validates there is a 10% growth within her commuting area for the occupational area of LPN-Nursing.*

*Recommended services after OBA/ISS for Jess include Occupational Skills Training. She was assessed for Supportive Service needs and reports she has adequate transportation and a valid driver's license to drive back and forth to school. She will also need to purchase nursing supplies as required with Supportive Service assistance. She states she does not need childcare as her mother will provide care for her daughter. Jess does request assistance with travel costs and is eligible for Transportation assistance. Jess was also provided information for the official FAFSA website and instructed to file for Financial Aid. Jess stated she has applied for her FAFSA but is still waiting for the results. Jess will provide as soon as the information/details are available.*

*Objective Assessment Summary completed, shared with Jess and signed.*

#### **Sample Development of Individual Employment Plan/Individual Service Strategy (IEP/ISS) Note:**

*Jess was present today to develop her Individual Employment Plan (IEP). After a review of the assessment and test results, plus a review of the information obtained from our interview, it has been determined no suitable employment is available, even with additional employment and case management services. Barriers to employment include limited work history, lack of higher education, lack of transferable skills needed for occupational goal, single parent, and low income. A review of training options was discussed, and the decision was made to enroll Jess in Occupational Skills Training to best meet her employment goal. Assessment and test results support her choice of training in the occupational area of LPN-Nursing.*

*We developed an employment plan together which includes setting specific, measurable, attainable, relevant, and time-based goals. Short-term and Long-term Goals and Objectives were established and linked to her training goal of successfully completing the LPN program at NICC, and employment goal of obtaining full-time permanent employment at a self-sufficient wage as an LPN. A detailed description of the Goals and Objectives can be found on the IEP form in IowaWORKS and the document is signed.*

*Based on Jess's current situation, we discussed what her vision for success would look like after receiving training, education, and a nursing credential. Jess states she is excited to start working on her dream of becoming a nurse and is focused on getting good grades. She states she can envision working as a nurse as she knows her hard work will pay off and her new job will bring financial stability for her family. She also wants to set a good example for her daughter and knows she will be proud of her.*

*Jess is eligible for Training Services based on the following: See Training Justification Case note for all details)*

**Training Justification Case Note:**

*Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services: Jess working PT as a cook is not enough to become self-sufficient. LPN will provide a more stable employment in a demand occupation. It has been determined no suitable employment is available, even with additional employment and case management services.*

*In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment: Barriers to employment include limited work history, lack of higher education, lack of transferable skills needed for occupational goal, single parent, and low income, which are preventing her from reaching self-sufficiency.*

*Has the skills and qualifications to participate successfully in training services: Jess's aptitude testing shows that she is capable of completing training services. Jess has been advised that additional training is recommended. A review of training options was discussed, and it has been determined that the results from her comprehensive and specialized assessments support her selection of Occupational Skills Training in the area of nursing.*

*Has selected program of training services that is directly linked to the employment opportunities in the local area or planning region: Labor Market Information from Northeast Iowa LWDA was*

*shared with Jess and validates there is a 10% growth within her commuting area for the occupational area of LPN-Nursing.*

*Is unable to obtain financial or grant assistance from other sources to pay the costs of such training. Jess has completed her FAFSA and is awaiting results. She states she is not default on any student loans. Once in the LPN program, she will also have possible assistance with Last Dollar Scholarship. Jess will provide Financial Aid Award letter/documentation when available.*

*Is determined eligible in accordance with Adult Priority of Service (only needed for Adults): Jess is eligible for the Adult Priority of Service based on Low Income.*

*Jess is eligible for the following Services: Occupational Skills Training, Supportive Services, and Transportation. These services will assist Jess in achieving her goals and objectives by providing ongoing support from the Workforce Consultant while in training, payment of tuition and fees to financially assist her with training costs, supportive services to help with training supplies, books, uniforms, etc., and transportation assistance to help pay for gas while in school. Training will be provided through an Individual Training Account (ITA) by a training provider that is on the Eligible Training Provider List (ETPL). The training service aligns with Jess's existing skills and career readiness using the results from her interest and skills inventory. Projected Training Start Date for LPN program at NICC is 1/18/2023. Projected End Date is 5/15/2026. Estimated total cost of training \$7100.00. The Individual Employment Plan (IEP) will be reviewed with Jess every 90 days at a minimum. The IEP will be updated as often as necessary in the event there is a change or modification to the training and employment goals and objectives. Services will be reviewed to confirm Jess is receiving all services necessary to ensure a successful outcome in meeting her goals and objectives.*

#### **Guidelines for Creating a Template:**

A case note is required for each service that is added to the participant plan.

Each service will have at a minimum:

- Service Type
- Start Date
- Planned End Date
- Details (Cost, rate, justification, etc.)

**Occupational Skills Training:** A case note is required to document when a participant receives assistance with an occupational skills training activity from the Eligible Training Provider List (ETPL) along with the justification for this service. The following information must also be documented in case note entries:

- Summarize why this training will be beneficial to the participant.
- Consumer Choice Worksheet completed.
- Training program and training institution where the participant will receive training.
- Program start date – planned end date.
- Copy of program curriculum uploaded.
- Current schedule
- Copy of unofficial transcript (if any)
- Detail the status of any Pell grants and/or other sources of financial aid that are available to the participant. If the participant has selected training that is not Pell grant eligible, this should be case noted.

***OST Ongoing Case Notes:***

- Schedule uploaded each quarter/semester.
- Copy of grades uploaded each quarter/semester. Are they eligible for an ITA for next semester?

***Closure:***

Once completed, the actual end date of the training, if the training completion was successful or unsuccessful. Was the training resulted in credential and measurable skill gains attainment.

**Support Services:** Each time a participant is provided with a service designed to reduce barriers to participating in training or work activities, it must be documented in a case note that includes the following information below: (Note: services such as TRN, DPC that are ongoing, only one case note is required. You do not need to create a new TRN or DPC service on the ribbon for each payment. You WILL have to enter a case note for each document received for payment.)

- Describe the participant’s need for the supportive service, including the specific barrier that the supportive service will address.
- Describe the efforts made to leverage the needed supportive service from other community organizations.
- Describe the specific supportive service that is provided, the date the supportive service is/will provided, the obligated amount of the service, and the Start Date and estimated end date. This would include the determination of costs (daily rate, unit, per hour, etc.)
- Appropriate documentation to support supportive service (maps, childcare provider details, etc.)



**Incentive Payments – Youth Only:** All incentive payments including what goal or milestone was obtained, must be documented in case notes in IWDS, and must include the following:

- The date the incentive was provided to the participant.
- The specific incentive provided.
- The date the milestone was achieved with appropriate documentation.
- The type of incentive that was provided to the participant. (e.g., The participant was provided with a \$100 YIP for obtaining their high school diploma on May 29, 2025)
- Documentation uploaded in the case note.

**Work Experience:** A case note is required to document when a participant receives a paid or unpaid structured learning activity at a worksite along with the justification for this service. The following information must also be documented in case note entries: Note: Each time a WEP timesheet is submitted, a case note needs to be entered. Dates covered, hours attended and date submitted for payment.)

- Describe the specific Work Experience activity the participant will receive (worksite, wage, maximum number of hours allowed, and a brief summary of the duties to be performed).
- Describe the specific skills the participant will acquire as a result of participating in the Work Experience activity.
- Describe how the Work Experience will help the participant achieve his or her employment goal.
- Dates: Start and End Date of the WEP.
- A copy of the signed Work Experience Contract and associated documents (see Procedures document) must be uploaded.

**Partner Services and/or Referrals:** Services that are provided to participants through a partner agency are required to be documented in a case note and must include the following information:

- Describe the partner agency and the specific service that is being provided.
- Describe how these services will assist the participant in attaining his or her education or employment goal(s).

**Job Search Assistance:**

A case note entry is required whenever an employer contact is made on behalf of a participant. Such contacts should be for the purpose of assisting a participant in finding work with this particular employer. Each time this service is provided, identify the specific employer(s).

### Workshops or Group Activities:

WIOA Title I services may be delivered in group or workshop settings. When a participant attends a workshop or group activity, information regarding the activity must be included in the case note.

- Include the title, date, and location of the workshop, for example: Participant attended the Resume workshop on March 21, 2023.
- Briefly describe the purpose of the workshop and what the next steps are in the WIOA Title I Program.

### WIOA Title I Exits:

As defined for the purpose of performance calculations, Exit is the point after which a participant who has received services through any program meets the following criteria: (1) For the adult, dislocated worker, and youth programs authorized under WIOA title I, the AEFLA program authorized under WIOA title II, and the Employment Service program authorized under the Wagner-Peyser Act, as amended by WIOA title III, exit date is the last date of service. (i) The last day of service cannot be determined until at least 90 days have elapsed since the participant last received services; services do not include self-service, information-only services or activities, or follow-up services. This also requires that there are no plans to provide the participant with future services. Furthermore, Section 677.150 (c)(1)(i) indicates that follow-up services do not extend the date of exit, and Section 116 of WIOA requires states to ensure data submitted and reported to the Department is valid and reliable.

During the 90-day period prior to exit, no new staff-assisted services may be entered unless additional services are legitimately planned. Only general case notes (not service entries) should be added to document participant status.

Case Note for Exit: “90 Days Prior to Exit”  
Procedure:

It is critically important when planning participant Exits that Workforce Consultants enter in the appropriate type of case note for the 90-day period prior to Exit. If a Workforce Consultant has determined the participant needs no further Staff-assisted service, it is extremely important during

Exit Exclusions:

Institutionalized – The participant has become incarcerated in a correctional institution or has become a resident of an institution or facility that provides 24-hour support such as a hospital or

this 90-day time period that case notes and/or services are not entered to simply

treatment center. The participant's stay is expected to last longer than 90 days.

Medical – The participant has medical treatment, and that treatment is expected to last longer than 90 days

#### **References:**

20 CFR 683.300(a)

20 CFR 677.150

TEGL 10-16 Change 2

IWD Local Monitoring Guide

Iowa ePolicy

Northeast Iowa Case Notes Best Practices

### **PARTICIPANT PAYMENTS REQUIRED DOCUMENTATION**

New 3/31/2025

#### **Purpose:**

To establish guidelines for the documentation of all participant payments under Title I of the Workforce Innovation and Opportunity Act (WIOA) to ensure compliance with applicable federal, state, and local requirements.

#### **Scope:**

This policy applies to all subrecipients of WIOA Title I funds responsible for administering participant payments, including but not limited to supportive services, training-related costs, and incentives.

#### **Policy Statement:**

Subrecipients are required to maintain adequate documentation for all participant payments to ensure accountability, transparency, and compliance with WIOA regulations. Payments must be appropriately documented and substantiated to demonstrate that they are reasonable, necessary, and allowable.

#### **Required Documentation for Participant Payments:**

All participant payments must be supported by the following documentation:

**1. Case Note Requirements - Payments**

- All participant payment documents must be uploaded in a case note in the IowaWORKS participant file.
- The case note must include the following details along with the attached documentation:
  - ✓ Service Type
  - ✓ Dates Covered
  - ✓ Payee (Vendor or Participant)
  - ✓ Date Paid
  - ✓ Amount
  - ✓ Documentation of Payment

**2. Payment Request Documentation**

- A completed and signed payment request form specifying the type of payment (e.g., supportive services, training payments, reimbursements, incentive).
- Case Note justification for the payment, including the specific need addressed and alignment with the participant's IEP or ISS. Refer to the Support Service Policy for all required case note documentation. Documentation of payment calculation, receipts, etc.
- If this is a recurring payment (TRN, DPC, etc.), the initial justification for justification must be addressed in the initial service case note.

**3. Proof of Cost or Need**

- Receipts, invoices, or other evidence of actual costs incurred by the participant.
- If payment is for a predetermined allowance (e.g., stipends), supporting documentation justifying the amount (e.g., hours attended for training or participation).

**4. Authorization and Approval**

- Signed approval from an authorized case manager or program supervisor.
- Documentation of compliance with the organization's internal controls and approval processes.

- The same person cannot authorize and approve any payments.
- QA must ensure that all appropriate documentation by the Workforce Consultant is entered in IowaWORKS (Service on the Ribbon Tab, Case Note with all required information.)

#### **5. Proof of Payment**

- Copies of checks, payment stubs, or electronic payment records must be uploaded and case noted in IowaWORKS.

#### **6. Compliance with Limits and Guidelines**

- Evidence that payments align with established WIOA cost limits and local policy guidelines (e.g., caps on supportive service payments).
- Compliance with Uniform Guidance – Cost Principles as outlined in the Uniform Guidance (2 CFR Part 200 – Subpart E) including being necessary, reasonable, and allocable.

#### **Retention and Accessibility of Documentation**

- Subrecipients must retain all documentation related to participant payments for a minimum of 5 years or as specified by federal and state regulations.
- Documentation must be accessible for review by monitoring entities, auditors, and other authorized parties upon request.

#### **Monitoring and Compliance**

- Subrecipients must implement procedures to ensure compliance with this policy, including quarterly review and monitoring of participant payment records. Noncompliance may result in corrective action, disallowed costs, or other consequences as determined by the Northeast Iowa Workforce Development Board (NEIWDB), State of Iowa or the Department of Labor or other oversight entities.
- Annual training is required to ensure compliance and adherence to this policy.

#### **Policy Review**

- This policy will be reviewed as needed annually and updated as necessary to ensure compliance with applicable regulations and to address organizational needs.

## INDIVIDUAL CAREER SERVICES

5/8/2024, 11/13/2024

Determination of eligibility for Individual Career Services:

Individualized career services must be provided to participants after American Job Center (AJC) staff determine that such services are required to retain or obtain employment. These services involve significant staff time and customization to each individual's needs, and generally will be provided by staff funded by WIOA Title I programs. However, it may also be appropriate for staff funded by WIOA Title III Wagner-Peyser Employment Service to provide some of these services.

If an individual has been determined eligible for individual career services, the following individualized career services must be made available if determined to be appropriate in order for an individual to obtain or retain employment:

- Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include:
  - diagnostic testing and use of other assessment tools; and
  - in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals
- Development of an Individual Employment Plan (IEP)/Individual Service Strategy (ISS), to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of, and information about, the eligible training providers
- Group counseling
- Individual counseling
- Career planning
- Short-term pre-vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training
- Internships and work experiences that are linked to careers
- Workforce preparation activities
- Financial literacy services
- Out-of-area job search assistance and relocation assistance
- English language acquisition and integrated education and training programs

To determine if individualized career services would be appropriate, a new assessment, interview or evaluation of a participant may not be required. It is allowable to use a recent assessment of the participant completed by another education or training program. Such assessments must have been completed within one year prior to enrollment.

## OBJECTIVE ASSESSMENT (OBA)

5/8/2024, 11/13/2024

### Purpose:

The Northeast Iowa Workforce Development Board provides this guidance on the assessment practices that are utilized by the Iowa **WORKS** one-stop centers in the assessments of WIOA participants.

### Background:

The goal of WIOA is to align services, establish consistency with WIOA partners and to promote program collaboration within the Iowa **WORKS** system creating greater efficiency in utilizing existing assessment processes while decreasing duplication of services within the WIOA partner system.

NEIWDB will follow ePolicy for Youth Objective Assessment (OBA) service:

<https://epolicy.iwd.iowa.gov/Policy/Index?id=179&Version=2>

NEIWDB will follow ePolicy for Adult and Dislocated Worker Objective Assessment (OBA) service:

<https://epolicy.iwd.iowa.gov/Policy/Index?id=144&Version=2>

### Policy:

An objective assessment (*OBA*) is an initial service activity to be provided to each Title I participant per section 129(c)(1)(A) of WIOA. The objective assessment process collects information upon which a participant's Individual Employment Plan (IEP) or Individual Service Strategy (ISS) will be based. Objective assessment is the mutual exchange of ideas and opinions, discussion and deliberation which includes an examination of the capabilities, needs, and vocational goals of a participant. Objective assessments include a review of the academic and occupational skill levels, as well as the service needs and strengths, of each participant for the purpose of identifying appropriate services and career pathways for participants and creating the IEP or ISS.

All of the information gathered for the purpose of developing the OBA must be included in the Objective Assessment document located in Iowa **WORKS**. Once the OBA is complete, the IEP/ISS should be developed, and updated as needed, based on the needs of each participant that is directly linked to one or more indicators of performance described in WIOA sec. 116(b)(2)(A)(ii).

An OBA is a procedure designed to comprehensively assess the skills, abilities, experience, aptitudes, strengths, and interests of each employment and training participant using diagnostic testing and other assessment tools. Objective assessment may be completed using any combination of the following:

- Structured interviews
- Skills and aptitude assessments
- Performance assessments

- Interest and/or attitude inventories
- Career guidance instruments
- Aptitude tests
- Basic skills tests

The Assessment process must utilize generally accepted methodologies and instruments to collect information on each of the following factors for each participant:

- a. Family situation
- b. Work history
- c. Education
- d. Basic literacy skills
- e. Occupational skills
- f. Work readiness skills
- g. Interests and aptitudes
- h. Attitude and motivation
- i. Financial resources
- j. Basic needs
- k. Review of strengths

For Youth, the assessment shall include a review of the following:

- a. Basic skills
- b. Occupational skills
- c. Prior work experience
- d. Employability
- e. Interests
- f. Aptitudes
- g. Support service needs
- h. Strengths (rather than just focusing on the areas that need improvement); and
- i. Developmental needs of participant, for the purposes of identifying appropriate services and career pathways for participants.

Assessments may include interviews, observations, TABE, and/or CASAS, NCRC as well as an in-depth review of work and educational history. These assessments are approved for use by the National Reporting System and the NEIWDB.

- The assessment must be thorough enough for the career planner and participant to develop an appropriate IEP/ISS.

The following assessments will be utilized as part of the Objective Assessment Process: TABE, CASAS, Aleks, Career Coach, NCRC, O\*Net Interest Profiler, CAPS/COPS/COPES. Assessment tools are evaluated on an ongoing basis by the Title I Service provider. The selection/addition of actual instruments will occur throughout the course of enrollment.

Basic Skills Assessment Requirements:



After the completion of the Objective Assessment, career planners may assess participants for Basic Skills Deficiency (BSD) before the completion of the IEP/ISS.

In assessing basic skills, local programs must:

- Use assessment instruments that are valid and appropriate for the target population; and
- Provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities.

For purposes of the basic skills assessment portion of the OBA, local programs are not required to use assessments approved for use in the Department of Education's National Reporting System (NRS), nor are they required to determine an individual's grade level equivalent or educational functioning level (EFL), although use of these tools is permitted.

Rather, local programs may use other formalized testing instruments designed to measure skills-related gains. It is important that, in addition to being valid and reliable, any formalized testing used to be appropriate, fair, cost effective, well-matched to the test administrator's qualifications, and easy to administer and interpret results.

Alternatively, skills related gains may also be determined through less formal alternative assessment techniques such as observation, folder reviews, or interviews. The latter may be particularly appropriate for youth with disabilities given accessibility issues related to formalized instruments.

*In contrast to the initial assessment during basic career services*, if measuring EFL gains after program enrollment under the measurable skill gains indicator, local programs must use an NRS-approved assessment for both the EFL pre- and post-test to determine an individual's educational functioning level.

Previous basic skills assessments that have been conducted within the past six months may be used if available. This may include assessments completed by a secondary school, Vocational Rehabilitation, Adult Basic and Literacy Education, or other education or training providers.

#### Basic Skills Assessment Tools:

The career planner can utilize TABE and/or CASAS when testing the participant for Basic Skills. The results of the assessments must be addressed in the IEP/ISS, this is important if participants are assessed as having basic skill deficiencies and require remediation. This may be conducted with our WIOA Title II Adult Education and Literacy partners. The use of ALEKS can also be used to determine basic skills when interested in post-secondary education.

#### Reasonable Accommodations:

Under Section 188 of the Workforce Innovation and Opportunity Act and related regulations,

providers must provide reasonable accommodation to qualified individuals with disabilities, unless providing the accommodation would cause undue hardship.

No qualified individual with a disability may be excluded from participation in, or be denied the benefits of a recipient's service, program, or activity or be subjected to discrimination by any recipient because a recipient's facilities are inaccessible or unusable by individuals with disabilities.

#### Equal Opportunity and Nondiscrimination Statement:

All Recipients, and Sub recipients/Sub grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

#### Assessment Interpretation

- Workforce Consultants should become familiar with the types of assessments administered to customers and should have an understanding of the results and what they mean.
- Workforce Consultants use the Objective Assessment in the development of the Individual Service Strategy (ISS) or the Individual Employment Plan (IEP).
- Workforce Consultants are required to explain the assessment results with the customer in a meaningful way, rather than just briefly covering the data or numbers.
- Workforce Consultants should not only explain assessment results but also relate them to the customer's specific goals, barriers, and strengths. This approach helps customers understand how the results align with their career and training plans, making the data actionable and relevant.
- Consultants should use the assessment outcomes to collaborate with the customer on setting realistic, attainable goals within the ISS or IEP. This process should involve discussions on immediate next steps, short-term objectives, and long-term goals based on the customer's interests and strengths.
- When interpreting assessment results, Workforce Consultants should also identify any barriers the customer might face and incorporate these considerations into the ISS or IEP. This might include discussing any needs for supportive services or accommodations based on assessment findings.
- Encourage Workforce Consultants to involve customers in the assessment interpretation process by asking questions, inviting their feedback, and verifying their understanding. This builds trust and ensures that customers feel empowered and informed about their service strategy.
- After interpreting assessment results and integrating them into the ISS or IEP, Workforce Consultants should document the discussion and establish a schedule for periodic review. Regular reviews allow for adjustments based on new assessments, progress, or shifts in

the customer's employment or educational situation.

## CONSUMER CHOICE (TRAINING SERVICES)

New 6/12/2024

NEIWDB will follow State ePolicy.

<https://epolicy.iwd.iowa.gov/Policy/Index?id=220&Version=1>

### Requirements of Consumer Choice

Training Services, whether under Individual Training Accounts (ITAs) or under contract, must be provided in a manner that maximizes informed consumer choice in selecting an eligible provider.

#### Purpose:

The Workforce Innovation and Opportunity Act (WIOA) provides a framework for a workforce development system designed to help job seekers access employment, education, training, and support services. One of the key components of WIOA is ensuring that individuals have access to a variety of training options and can make informed decisions about their training and career pathways.

In the Northeast Iowa Local Area, we are committed to ensuring that all consumers have the ability to make informed choices regarding their services and support. Our consumer choice process involves several key steps.

1. **Career Services Determination:** Determining the career services that are best performed by the Iowa**WORKS** Center consistently and career services that require contracting with a career service provider.
2. **Assessment and Eligibility Criteria:** Determine individual eligibility for training services. This includes evaluating the individual's employment history, skill levels, and career goals to ensure they meet eligibility criteria. This is a part of the OBA and ISS process. The IEP/ISS will outline the individual's career goals, the services needed to achieve those goals, and the steps required to complete the plan. During this process and the need for training determined, individuals will receive career counseling to help identify suitable occupations and training programs.
3. **Information Dissemination:** Title I provides comprehensive information about the available services and providers and programs. This includes details on the cost, duration and outcomes of the programs.
  - Eligible Training Provider List (ETPL): Individuals will use the ETPL to compare different training providers and programs. The ETPL is a state-maintained list of

training providers who have been approved to provide training services to WIOA participants.

- This helps to ensure sufficient access to services for individuals with disabilities, including opportunities that lead to integrated, competitive employment for individuals with disabilities and sufficient access for adult education and literacy activities.
4. **Consultation and Support:** Career Planners work one-on-one with participants to help them understand their options and make informed decisions. They select a provider and program that best meets their needs and career goals.
- Research and Information: Individuals are provided with information about various eligible training providers and programs. This includes details on the cost, duration and outcomes of the programs (e.g., completion rates, employment rates, average wages).
  - Eligible Training Provider List (ETPL): Individuals will utilize IowaWORKS ETPL to compare different training providers and programs. The ETPL is a state-maintained listing of training providers who have been approved to provide training services to WIOA participants. The ETPL list can be accessed at [www.iowaworks.gov](http://www.iowaworks.gov) without logging in. Under *Job Seekers*, click *Additional Services*, and then click *Training Services*. Next, click *ETPL Approved Programs* to explore and review training programs.
  - Performance Data: Individuals are given access to performance data for each training provider to make an informed choice. This data includes metrics like job placement rates, average earning of graduates, and industry-recognized credentials earned.
5. **Selection Mechanism:** Participants can select their preferred options thorough individualized counseling sessions with their Career Planner and by completing the State of Iowa – Consumer Choice Worksheet.
- Consumer Choice: With the guidance of their Career Planner, individuals make an informed choice about which training provider and program best meets their needs and career goals.
  - Consumer Choice Worksheet: Participants will complete the comparison worksheet of approved training providers to help them select the program that best matches their career goal. This document will need to be signed by both the participant and Career Planner and document uploaded to Consumer Choice case note. The Consumer Choice Worksheet is available on the IWD Employment & Training Hub, Title I Adult, Dislocated Worker & Youth, Title I Resources, F)Training, Training Justification & Consumer Choice.

6. **Referral Process:** Once a decision has been made, the Career Planner facilitates the referral process with the chosen provider.
7. **Participant Rights and Responsibilities:** Participants are informed of their rights to choose among available options without undue influence, as well as their responsibilities in maintaining eligibility for services.
8. **Conflict of Interest:** The Northeast Iowa Workforce Development Board has conflict of interest policies in place to manage and mitigate conflicts of interest ensuring that all advice and support provided by staff are unbiased and in the best interest of the participant.
9. **Coordination with Other Services:** The ITA process is closely coordinated with other services offered by the Iowa**WORKS** offices, including workforce preparation activities, job search and placement assistance and supportive services to provide a holistic support system.
10. **Staff Training:** Career Planners and other relevant staff undergo training to stay informed about the ITA process, consumer choice requirements and how to support participants in making informed decisions.
11. **Continuous Improvement:** Northeast Iowa LWDA has mechanisms in place for the continuous improvement of the consumer choice process, including policy reviews, feedback loops from participants and staff and the integration of best practices.

This process ensures clarity and transparency, helping participants understand how they can exercise their choice and ensuring that the process is systematic and fair. The cornerstone of the WIOA Consumer Choice process is ensuring that individuals make well-informed decisions about their training and career paths. Information and services should be accessible to all individuals, including those with disabilities.

#### CUSTOMIZED TRAINING (CUS)

NEIWDB will follow State ePolicy.

<https://epolicy.iwd.iowa.gov/Policy/Index?id=134&Version=1>

#### ENTREPRENEURIAL TRAINING (ENT)

NEIWDB will follow State ePolicy.

<https://epolicy.iwd.iowa.gov/Policy/Index?id=136&Version=2>

#### INCUMBENT WORKER TRAINING (IWT)

3/8/2023, 12/12/2025

### **Purpose**

This policy provides criteria to determine which workers, or groups of workers, are eligible for incumbent worker training services and the cost sharing required for incumbent worker training projects. ([WIOA Section 134\(d\)\(4\)](#)).

### **Background**

Incumbent Worker training is designed to meet the special requirements of an employer (including a group of employers) 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 and conducted with a commitment by the employer to retain or avert the layoff of the incumbent worker. An ideal incumbent worker training would be one where a participant acquires new skills allowing him or her to move into a higher skilled and higher paid job within the company, thus allowing the company to hire a job seeker to backfill the incumbent worker's position.

Incumbent Worker training must increase both a participant's and a company's competitiveness.

Under Section 134(d)(4) of WIOA, local boards can use up to 20 percent of their adult and dislocated worker funds to provide for the federal share of the cost of providing Incumbent Worker Training. NEIWDB will track any Incumbent Worker Training funds to ensure that funding limits do not exceed the 20 percent of adult and dislocated worker funds.

### **Incumbent Worker Training Eligibility Criteria**

An incumbent worker must be:

1. A U.S. citizen or otherwise legally entitled to work in the U.S.;
2. Age 18 or older;
3. Registered for the Selective Service (males who are 18 or older and born on or after January 1, 1960) unless an exception is justified;
4. Employed;
5. Meet the Fair Standards Act requirements for an employer-employee relationship <http://www.dol.gov/whd>; and
6. Have an established employment history with the employer for six (6) months or more.

*Note: Per proposed 20 CFR 680.780, an incumbent worker does not necessarily have to meet the eligibility requirements for career and training services for adults and dislocated workers under this Act.*

### **Employer Eligibility Criteria**

The following factors must be considered when determining the eligibility of employers to receive the WIOA share of funds to provide training to incumbent workers using either Adult

and/or Dislocated Worker formula funds:

1. The characteristics of the incumbent workers to be trained and how they would benefit from retention or advancement. Consideration should be given to employers who propose to train individuals with barriers to employment as defined in WIOA Section 3(24).;
2. The quality of training. Whenever possible, the training should allow the participant to gain industry-recognized training experience and/or lead to industry-recognized credentials and/ or an increase in wages;
3. The number of participants the employer plans to train or retrain;
4. The wage and benefit levels of participants (before and after training);
5. The occupation(s) for which incumbent worker training is being provided must be in demand;
6. The employer is:
  - a. In an in-demand industry as determined by labor market information; or
  - b. In an in-balance industry as determined by labor market information; or
  - c. In a declining industry, but there are compelling reasons (e.g., evidence of long-term viability of the employer) justifying investment in incumbent worker training.
7. The employer must not have laid off workers within 120 days to relocate to Iowa from another state;
8. The employer is current in unemployment insurance and workers' compensation taxes, penalties, and/or interest or related payment plan.

Each of the above factors leading to the approval of an incumbent worker training project with an employer must be documented and placed in the contract file.

### **Employer Share of Training Costs:**

Employers participating in incumbent worker training are required to pay the non-WIOA (non-federal) share of the cost of providing training to their incumbent workers. ([WIOA Sections 134\(d\)\(4\)\(C\)](#) and [134\(d\)\(4\)\(D\)](#) and proposed [20 CFR 680.820](#))

The employer share is based on the size of the workforce (wages paid to the participant while in training can be included as part of that share and the share can be provided as cash or in-kind that is fairly evaluated) as follows:

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

Employer cost share contributions must be tracked and documented in the contract file. In addition, the methodologies for determining the value of in-kind contributions must be documented in the contract file and conform to cost sharing requirements at [2 CFR 200.306](#).

## Multiple Training Cohorts and Series of Trainings

NEIWDB recognizes that some employers may require multiple training cohorts or a series of related trainings to address ongoing workforce needs or certification pathways. Employers may apply for multiple IWT projects within the same program year under the following conditions:

- 1. Distinct Projects:**

Each training activity or cohort constitutes a separate project with its own application, budget, participant list, and outcome documentation.

- 2. Funding Limits:**

Employers may receive multiple IWT awards within a program year, however, the total WIOA funds awarded to a single employer may not exceed \$10,000 per program year unless otherwise approved by the NEIWDB Planning & Operations Committee or designee, subject to funding availability and demonstrated need.

- 3. Employer Match:**

The required employer cost share must be applied and documented separately for each cohort or project. Match contributions cannot be duplicated across projects.

- 4. Justification:**

Each training must demonstrate a clear business need and connection to employee advancement, job retention, wage progression, or increased competitiveness. Routine or compliance-based training (e.g., OSHA, HIPAA, or safety refreshers) is not eligible.

- 5. Tracking and Reporting:**

Each cohort must be tracked individually for participants trained, cost per participant, training provider, credentials attained, and post-training outcomes.

- 6. Pre-Approved Series:**

NEIWDB may approve a single umbrella application for a planned series of cohorts if the employer identifies projected training dates, participant numbers, and costs in advance. Cohort-specific documentation must be submitted prior to the start of each training and separate invoices must be submitted for reimbursement.

## References

WIOA Section 3(23)

WIOA Section 134(d)(4)

Proposed 20 CFR 680.780, 680.790 and 680.820

2 CFR 200.306

TEGL 19-16



## INDIVIDUAL CAREER SERVICES (SEE OBJECTIVE ASSESSMENT AND INDIVIDUAL CAREER SERVICES POLICY)

See Objective Assessment and Individual Career Services Policy

## INTERNSHIPS (INT)

NEIWDB will follow State ePolicy.

<https://epolicy.iwd.iowa.gov/Policy/Index?id=140&Version=1>

## JOB SHADOWING (SHW)

NEIWDB will follow State ePolicy.

<https://epolicy.iwd.iowa.gov/Policy/Index?id=142&Version=1>

## OCCUPATIONAL TRAINING (OST)

Updated 3/8/2023, 7/17/2023, 9/11/2023, 6/25/2025

NEIWDB will follow State ePolicy with the addition of the following:

<https://epolicy.iwd.iowa.gov/Policy/Index?id=145&Version=2>

WIOA Title I Occupational skills training equips participants with specific vocational skills that enable them to achieve proficiency in executing real-world tasks and technical functions essential to various occupational fields, spanning entry, intermediate, and advanced levels. Notably, Youth participants who are not co-enrolled and those who do not receive funds from an Individual Training Account (ITA) are not obligated to select a training provider from the Eligible Training Provider List (ETPL).

Northeast Iowa includes identification of existing and emerging in-demand industry sectors and the employment needs of employers in those industry sectors and occupations. Northeast Iowa gives priority consideration to training programs leading to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area. ***See In-Demand Occupation Determination & Usage Policy.***

Such training must:

1. Be outcome-oriented and focused on an occupational goal specified in the individual service strategy.
2. Be of sufficient duration to impart the skills needed to meet the occupational goal.
3. Lead to the attainment of a recognized postsecondary credential.

Northeast Iowa ensures that the training program, at a minimum, adheres to the following

guidelines:

1. All participants who are enrolled in OST must apply for any financial assistance for which they may qualify.
2. OST funds may only be used to pay for tuition. Books, fees, and materials for coursework, as required, may be paid for through the Educational Assistance (EST) support service.
  - Total payments on an ITA may not exceed \$8,000. **Maximum for OST - \$6,000** and \$2,000 for EST services per participant per program year; however, may be increased in extraordinary circumstances by up to \$500.00 by the **NEIWDB Executive Director** when unusual circumstances occur.
  - Books may be paid for through the contract with the local school. If possible, books should be charged at the local bookstore.
3. All participants who are enrolled in OST must be covered by the training institution's tuition refund policy.
  - a. In the absence of a refund policy established by the training institution, the WIOA Title I service provider must negotiate a reasonable refund policy with the training site.
4. For Adults and Dislocated Workers, co-enrolled Youth or Youth who receive funds from an ITA, documentation of consumer choice in selecting both an approved training provider and program must be entered into the data management system.
5. All participants are required to attend classes full-time unless no other classes are available.
6. Classes that are not a part of the curriculum are not allowed with an OST service. For example, if a student is taking a Spanish class but it is not required for the degree program the class would not be allowed. With the Title I Director review and approval, this service could be covered under PVA but the career planner must determine how that class would be a benefit and be documented in a case note.

### Attendance

Participants are expected to maintain regular class attendance with the exception of Online courses. If attendance falls below 90% of the scheduled hours, participants may be put on probation.

### Grades

Participants must maintain at least a "C" (2.0) GPA. If a "C" (2.0) average is not maintained,

participants may be placed on probation or discontinued the next semester/quarter.

Note: In order to remain eligible for WIOA financial assistance for books, tuition and fees, all students must meet the guidelines set forth by their respective educational institutions for retaining financial assistance. Failure to meet the school's criteria for retaining financial assistance will also result in the loss of WIOA funding.

A copy of participant grades is required to be placed on file at the end of each quarter or semester. No classes can be added or dropped without WIOA Title I staff approval. Students must attend class during scheduled hours. Participants cannot substitute time assigned in one class by attendance in another but can spend extra-unscheduled hours in individual study, lab classes, etc.

WIOA Title I will pay OST costs if a student must retake a class, due to having failed or withdrawn from the class, provided the original class was not subsidized by WIOA. However, if a student does retake a class and does not qualify for OST reimbursement, support services can be provided by WIOA.

### **Retesting**

WIOA will pay for retesting for example, CNA or HiSET tests, under Educational Testing (EDT) or Secondary Education Certification support services.

### **Progress Reports**

Twice a semester at the end of the first thirty (30) days and at mid-term - instructor(s) complete and sign a progress report or, where available, students may print a current grade report from the training institution's web site. Lack of progress could result in probation or termination. For short-term courses, such as CNA or summer sessions, timesheets will be required in lieu of progress reports.

Participants must maintain satisfactory progress/grades throughout the training program. A copy of grades/transcripts must be case noted and uploaded each semester/quarter.

### **Timesheets**

Participants who receive support services are required to turn in a timesheet showing attendance every two weeks, as a written request for support service payments. The timesheets and the corresponding written request for payment will be submitted no later than the last day of the following month. Written requests for payments submitted later than the last day of the following month may not be paid.

---

## **ONLINE DISTANCE LEARNING**

Updated 3/8/2023

The ability to monitor attendance in training is the primary concern when determining the approvability of distance training for the students. The usual meaning is that the training takes place in a room in a school where students can interact with an instructor. Therefore, the key

element to approvability of distance training is based primarily on the interactive nature of the classroom training experience between instructor and student. A means of communication must be established where the instructor can ask questions of the students, and the students can respond and ask questions of the instructor.

Distance training is allowable if the Provider/Program is active on the State ETPL.

## ON-THE-JOB (OJT) TRAINING

NEIWDB will follow State ePolicy with the addition of the following:

<https://epolicy.iwd.iowa.gov/Policy/Index?id=146&Version=1#>

### OJT WAGES & BENEFITS

On-the-Job Training (OJT) in Northeast Iowa can be for a maximum of \$10,000 or six months depending on the current skills and the skills required in the new job. On-the-Job-Training occurs when objective assessment indicates that this will be the best process to meet the participant's needs. Specific training lengths are determined by input from the employer as to training time needed according to the skill level of the job and by the applicant's past work experience and vocational training background.

Participants will be enrolled in specific OJT that meets their needs and has met the criteria established by Northeast Iowa. Upon development of this training, the employer will complete a pre- award survey determining specific job skills to be learned and other information needed by the administrative entity to determine if a contract will be written. Northeast Iowa has established working relationships with numerous area employers committed to providing quality training to identified participants and retention of these individuals after training.

The payment by WIOA must not exceed fifty percent (50%) of the wages paid by the employer to the participant during the period of the training agreement. Reimbursement will be made at 50% of the regular hourly rate for actual hours worked including overtime hours. Under no circumstances will overtime rates or holiday rates be reimbursed.

### EMPLOYER ELIGIBILITY

An OJT contract will not be written with an individual's current employer. The **Title I Director** may allow exceptions to this rule if an OJT with an individual's current employer would allow them to move from a part-time or temporary status to a full-time permanent status **-and-** the OJT is for a position that is substantially different than the individual's current job with that employer. If a participant is currently on an OJT contract with an employer and has a job classification change, a contract modification will be written to reflect that change. Specifics of job duties, training hours required, and other changes will be negotiated with the employer. The SVP codes will be utilized as well as the input of the employer to determine how much additional training time could be authorized with approval of the **Title I Director**.

NEIWDB re-contracting procedures will consist of the following:

- Prior to re-contracting with a service provider, a review process of past performance of that service provider will take place. A criteria checklist will be used to determine whether to use an employer as a training site for an OJT.
- Does an employer consistently meet training goals and provide adequate training in key skill areas to be learned on the job?
- Is there a pattern of transition of trainees to employment at the end of a contract, not including those terminated for good cause as identified? (After at least 3 contracts, at least a 65% retention rate).
- Is there a pattern of retaining an employee who completed training past the 90- day follow-up? (After at least 3 contracts, at least a 65% retention rate).
- Is there evidence of good safety procedures/conditions in place? Does the company do training as stated in the Hazardous Materials Act? (Businesses will be toured prior to development of a contract to determine above).
- Has the employer in past contracts cooperatively provided documentation needed in a timely manner to meet monitoring and auditing needs?
- If a contractor refused to provide necessary auditing or monitoring information, such as payroll records, time sheets/cards, etc., no additional contracts will be written.
- If the employer in the past, has not cooperated and if conditions have changed, i.e., management, personnel, or procedures, this may warrant another trial contract to be negotiated.
- After any allegation that an employer has failed to provide adequate training in key skill areas as called for in the contract, the program supervisor/designee will meet with the employer to address the problem. If the allegation can be substantiated and cannot be resolved satisfactorily, no additional contracts will be written until a resolution occurs.
- When, after touring a prospective training site, unsafe working conditions are found to exist, or safety procedures are not in place, or they do not seem to be in compliance with the Hazardous Materials Act, administrative entity staff will discuss the problem with the contractor. If the contractor agrees to rectify the problem by developing safety procedures or removing the unsafe or unsanitary working conditions the contract could be written. If a subsequent check indicates that no effort is being made to address the problem, no additional contracts will be negotiated until all safety concerns are fully resolved.
- When after a minimum of 3 contracts an employer fails to meet a 65% retention rate (except those terminated for good cause) at the completion of the contract or follow-up, no additional contracts will be written. (Examples of good cause are absenteeism, disciplinary problems, lack of progress, etc.).
- When after it has been conclusively proven that an employer had intentionally altered claim forms, time sheets, payroll records, evaluation, or other records to defraud the program of funds, no additional contracts will be written.

---

### OJT PAYMENT & TRAINING LENGTH

Final approval of the length of an OJT contract at a rate of 50% or less reimbursement will be approved by a Program Supervisor. Current reimbursement rate is 50% of training hours worked; however, contingent upon high budgetary obligations and NEIWDB approval, the reimbursement rate may be reduced.

An OJT contract may be modified when the employer notifies the specialist of training wage increases if the budget allows. However, if the specialist is not informed in advance of that change, there is no requirement on the part of WIOA to reimburse for the difference.

---

### OJT CONTRACTS

The general length of the OJT contracts is based on skill, i.e., the higher the skill, the longer the contract. The number of hours is determined by using information coded in two Departments of Labor publications (1) O\*NET, Dictionary of Occupational Titles, or Career Info Net and (2) Specific Vocational Preparation Estimates (SVP). To determine the length of training, the following chart will be used:

SVP Level	Hours
1	80
2	160
3	520
4	1040
5	2080
6+	4160

The following factors will be used to modify the length of an OJT should specific circumstances exist:

- If the pre-award employer request for OJT indicates a shorter training length is appropriate, then the shorter training length will be used.
- If a client has previous work experience or classroom training in that job title, the actual length of an OJT contract will be reduced by 40 hours for every one month of previous work experience or classroom training in that job title. If less than one month, the contract will be reduced by 10 hours for each week.
- If the participant has had some hours of job specific classroom training in that field as part of other job specific training, the OJT will be shortened by the hours of that specific related OST time. Northeast Iowa will reduce each OJT by 40 hours for each month of previous directly related training and/or directly related work experience. Previous training or experience which occurred so long ago that skills gained from that experience are obsolete may be disregarded to the extent that those skills need to be relearned or reacquired.
- Under normal conditions, an OJT contract may not exceed 26 weeks in length.
- Additional training time above the actual length of an OJT contract can be allowed if

approved by the **NEIWDB Executive Director** when extenuating circumstances exist, such as a client who is disabled, an older individual (55 years or older) or a member of other targeted groups or having a barrier to employment. The contract length can be extended to a maximum of 50% above the actual length of the contract to a maximum of 26 weeks.

- Part-time OJT contracts are permitted if approved by the **Title I Director** for participants who are disabled, older individuals (55 years of age or older), members of other targeted groups who are able to work only part-time, or in-school youth participants. Part-time contracts may be written for a length of up to 499 hours and a maximum twelve (12) month time period.
- Part-time OJT's can be written in conjunction with OST training when the employment goals at the end of the training are substantially the same, or the OJT experience would aid the OST graduate when beginning the work search, or the OJT would become full-time upon completion of the OST.
- Part-time OJT's can also be written if they meet all other criteria and will become full-time positions by the end of the training period. If part-time OJT's are written, training costs will be reimbursed at the same rate as full-time OJT's, up to 50% of the training wages, and using the same SVP conversion rate.
- A minimum of 160 hours has been established for OJT length except in the case of adjusted training lengths due to classroom training or past work experience in this field. In these cases, a minimum of less than 160 hours of On-the-Job-Training may be justified.

---

#### OTHER ONSITE TRAINING

Actual training costs above and beyond the training normally provided by the employer, to regular employees, may be reimbursed by WIOA, as well as participant support services which allow the participant to receive the training.

The employer will be responsible for the service provider's fees and may be reimbursed for this additional training based on pre-approval by the **NEIWDB Executive Director**. Cost of actual training hours may be reimbursed to the employer at the normal reimbursement rate if the participant is receiving wages during that training time.

#### PRE-VOCATIONAL ACTIVITIES (PVA)

Updated 3/8/2023, 7/10/2024

<https://epolicy.iwd.iowa.gov/Policy/Index?id=334&Version=2>

NEIWDB will follow State ePolicy with the addition of the following:

Clear documentation of the Pre-Vocational Activity needs to be provided in a case note. Additionally, Justification must also be documented accordingly.

PVA funds have a maximum expenditure of \$1,000 per participant per program year.

#### QUALITY PRE-APPRENTICESHIP (QPA)

NEIWDB will follow State ePolicy.

<https://epolicy.iwd.iowa.gov/Policy/Index?id=149&Version=1>

#### REGISTERED APPRENTICESHIP (RA)

NEIWDB will follow State ePolicy.

<https://epolicy.iwd.iowa.gov/Policy/Index?id=150&Version=1>

#### SECONDARY EDUCATION CERTIFICATION (SEC)

NEIWDB will follow State ePolicy.

<https://epolicy.iwd.iowa.gov/Policy/Index?id=152&Version=1>

#### WORK EXPERIENCE (WEP)

NEIWDB will follow State ePolicy with the addition of the following:

<https://epolicy.iwd.iowa.gov/Policy/Index?id=156&Version=1>

- The prevailing wage per industry is allowable.

#### SUPPORT SERVICES

Updated 3/8/2023, 10/11/2023, 7/10/2024

##### Background

Support services may be provided when determined to be reasonable and necessary to address participant barriers and enable their participation in WIOA Title I or partner program career and training services. Support service payments are intended to provide temporary financial support to participants and may only be made for activities which support their Individual Employment Plan or Individual Service Strategy.

##### Policy

The following policy will be followed by the NEIWDB on how the local area provides supportive services. These procedures are applied to all participants in any program or activity for which support service payments are provided.



#### Non-Duplication of Resources and Services:

Support services provided by WIOA Title I must not duplicate a service a participant can receive from another entity or program.

#### Assessing the Need for Support Services:

A supportive service may be provided when necessary to address participant barriers and enable their participation in WIOA Title I or partner program career and training services.

For Youth, Support Services are one of the Fourteen (14) Title I Youth program elements that must be made available to participants.

As part of the OBA process and development of the IEP/ISS, it is important to assess a participant's need for a Support Service. In assessing the appropriateness for a Support Service, career planners must utilize and refer participants to partner agencies and community resources first. Documentation of referrals must be within the IowaWORKS system as a referral service and documented in case notes.

Participant barriers are identified through the Objective Assessment (OBA) process and must be outlined in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS). Support Service payments are made to or on behalf of eligible participants for temporary assistance required to support the IEP/ISS.

A Support Service must be justifiable and essential to enable a participant to take part in services and activities related to the IEP/ISS. A support service provided by Title I must not duplicate a service a participant could receive from another program.

Support Services are not intended to meet every need of the participant. Rather, they provide temporary assistance. For this reason, career planners must discuss and develop a plan in coordination with the participant regarding how they will cover the supported cost once WIOA Title I funds are no longer appropriate. The plan should include how financial literacy will be implemented. This plan must be documented in case notes in IowaWORKS, and a financial literacy service should be recorded as applicable.

#### Procedure for Support Service Referrals Including Financial Literacy Referrals:

The Comprehensive and Affiliate Job Centers must keep an up-to-date listing of available community resources (paper and/or electronic) and make them available to participants prior to any WIOA payment for supportive services.

Provide information in clear and understandable formats and languages about available supportive services or assistance. Make appropriate referrals to services such as:

- Child Care
- Child Support
- Medical or child health assistance through Medicaid and the Children's Health Insurance Program
- Benefits under SNAP
- Assistance through the earned income tax credit
- Assistance until Iowa's TANF program
- Other support services and transportation provided through these programs.

#### Types of Support Services to be Provided:

The following are allowable support services for the Northeast Iowa LWDA:

- Clothing (CHG)
- Dependent Care (DPC)
- Educational Testing (EDT)
- Financial Assistance (FAS)
- Health Care (HLC)
- Miscellaneous Services (MSS)
- Transportation (TRN)
- Educational Assistance (EST)
- Services for Individuals with Disabilities (SID)
- Supported Employment & Training (SET)
- Stipends (STI) – YOUTH ONLY
- Youth Incentive Payments (YIP) – YOUTH ONLY

#### Approved Payment Methods:

The following are approved payment methods:

- Check
- Direct Deposit
- Direct to Vendor Check

#### Limits/Caps on the Amount of Supportive Services:

Payment rates, maximum amount of payments (including program year or enrollment) are listed within each supportive service.

Maximum length of time for support services to be available to participants will be based on participant need or funding availability or policy maximums.

#### Exceptions to Established Limits:

If Title I seeks an exception from a local NEIWDB policy, they must submit a waiver request form **(Appendix A)** to the board's Executive Director. These requests will be evaluated individually, and the waiver form should provide a thorough justification for the exception.

#### Procedures for Tracking Support Services:

The Title I Service Provider will provide a process for which tracking of all payments (support services and other types of payments). The NEIWDB will monitor to ensure that procedures are being followed by local staff. Support Service policy will be a part of the local Title I monitoring by the board.

For purchases of gas cards or other similar methods of assistance paid in advance of the cost being incurred, the Title I Service Provider will use the above Service Provider process for tracking and accounting for its use in conjunction with the WIOA activity for which the supportive service is allowing the participant to participate in.

#### Financial Literacy (FIN):

Financial literacy services should be incorporated into all career planning activities for participants and will be provided to participants who receive DPC (Dependent Care), FAS (Financial Assistance) and TRN (Transportation) services.

A financial literacy service may include such things as a One Stop Center workshop, partner classes, or 1x1 counseling with a community agency.

#### Support Services Training:

NEIWDB will provide Title I leadership staff training on the Support Service policy and procedures. NEIWDB will monitor that effective training has taken place and procedures are being followed by local staff. Support Service policy will be a part of the local Title I monitoring by the board.

#### Unallowable Support Service Costs

Unallowable WIOA costs include, but are not limited to the following:

- Fines, penalties and bad debt expenses
- Payment for goods/services incurred or received prior to participant enrollment in WIOA
- Legal fees
- Interest on borrowing
- Titled or deeded items or when recovery of the expense is anticipated. Examples include: Rent or housing deposits, mortgage payments, homeowners insurance, property taxes, car payment, purchase of vehicle.
- Business start-up costs

- Internet or phone service (prepaid, plan, minutes, etc.) or memberships of any kind
- Membership fees

Receipts or invoices must be detailed sufficiently to ascertain that charges do not include unallowable items.

### Support Service Documentation

When approving Support Services, the following documentation must be entered within the IowaWORKS case note.

- Subject Line: Support Service (ie – TRN, DPC)
- The WIOA or partner activity the Support Service supports
- How the Support Service addresses barriers and assists the participant in achieving their IEP/ISS goals.
- How the obligation was determined. (i.e. TRN 50 miles/day = \$15.00 Daily Rate X 4 days/week X number of weeks. Should be broken out by fiscal year)
- The rate or amount of Support Service to be provided
- The length of time the Support Services will be provided.
- The referrals and outcomes of referrals made to partner and community resources.
- Documentation that the participant is unable to obtain the service through other programs or that the urgency of the needed service is such that referrals to other resources would delay the provision of the Support Service and create a hardship for the participant.

Financial literacy service planned and the plan for the participant to cover this cost after the temporary Support Service funding should be documented for Transportation, Child Care and Financial Assistance.

The approving case manager or designated reviewer is responsible for ensuring all documentation is uploaded, correct, and legible before authorizing obligation and payment vouchers. All payments require adequate supporting documentation to justify the payment.

### When Paying Support Services:

When paying Support Services, hard copy documentation to confirm the allowability and accuracy of the payment, along with proof of payment, must be uploaded into IowaWORKS and attached to the appropriate case note. The following documentation must be entered within IowaWORKS case notes:

- Support Service type
- Support Service payment amount
- Date the Support Service was paid

- Time period the Support Service covered
- Payment Type: check, check number, etc.

#### Support Services Specific to Youth Participants:

Support services which assist a parent, spouse, or legal guardian's participation in a youth participant's education or training, are allowable under the Title I Youth program. Such payments might include reimbursement for transportation costs or childcare for a parent to attend a conference regarding a youth participant's progress toward achievement of the objectives of the ISS.

#### Follow-Up and Support Services:

Title I Adult and Dislocated Worker participants cannot receive support services during the provision of follow-up services. Adults or Dislocated Workers identified as needing ongoing supportive services must still be participating in career services (other than follow-up), training activities, or both to continue to receive supportive services.

Title I Youth participants may receive support services during the provision of follow-up services based upon their needs and only to enable the participant to participate in WIOA activities.

The following are the allowable types of Support Services that are available through the Northeast Iowa LWDA:

---

#### CLOTHING (CHG)

Updated 10/27/2022, 10/11/2023, 7/10/2024

Payments for items such as uniforms, clothes and shoes that are necessary for participation in WIOA Title I activities, including interviewing, employment or experiential learning services are allowable. Maximum expenditure for these items is \$500.00 per participant enrollment.

Protective gear items are allowable. Maximum expenditure for this is \$1,000 per enrollment.

---

#### DEPENDENT CARE (DPC)

Updated 10/27/2022, 8/7/2023, 9/13/2023, 7/10/2024

The cost of dependent care from licensed daycare providers or from private sources agreed upon by the participant and WIOA Title I Service provider career planner is allowable. Dependent care payment may not be made to individuals living in the same household. Dependent care includes child or adult care. Higher rates may be allowed in special cases, including, but not limited to, the care of an infant, sick child, or person with a disability. If an unemployed parent of the child(ren) resides in the home, no childcare support will be provided. Dependent Care Support should only be used when the participant is not eligible for, or is pending approval of, Child Care Assistance

---

through DHS/PROMISE JOBS. If DHS Child Care program eligible, Title I participant must choose an approved provider.

DPC may be used to assist participants with additional study time while enrolled in postsecondary education, at a ratio not to exceed one classroom hour to additional two study hours.

A maximum of \$4.80/hour per dependent or the rate of the provider, whichever is less, may be reimbursed; \$48.00/day maximum per dependent. A maximum of \$240.00 per week for one dependent and \$480.00 maximum per week for two or more dependents. Dependent care is based on a five-day week. The maximum expenditure is \$5,000.00 per participant per program year.

Dependent care payments are paid directly to the participant. This is a reimbursement of costs, and the participant is responsible for paying their provider.

Dependent care provider will complete the *Dependent Care Provider form* to document rates and costs. This form must be completed and signed by the provider and the participant.

---

#### EDUCATIONAL ASSISTANCE (EST)

Updated 3/8/2023, 7/17/2023, 6/25/2025

Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes is allowable. Maximum expenditure is \$2,000.00 per participant per program year. EST services plus OST costs may not exceed \$8,000 per participant per program year.

---

#### EDUCATIONAL TESTING (EDT)

Updated 10/27/2022

Assistance with educational testing required for participation in WIOA Title I activities is allowable. Some examples of educational testing include, but are not limited to, high school equivalency testing, state boards, national exams, and vocational testing. If required for employment, the costs for licenses and application fees are allowable. Maximum expenditure is \$1,000.00 per participant per program year.

---

#### FINANCIAL ASSISTANCE (FAS)

Updated 10/27/2022, 4/3/2023, 7/10/2024

The purpose of a Financial Assistance Payment is to make a payment to a service provider or vendor on behalf of a participant. This payment is used to cover an emergency financial need of a participant that, if unmet, would prevent the participant from participating in WIOA Title I activities or maintaining employment. FAS may not be used to pay any type of fines or penalties

---

imposed because of failure to comply with any Federal, State, or local law or statute. Allowable FAS services include housing assistance, eyeglasses repair, auto repair, technology needs for coursework or job search and others as approved by **Title I Director**.

If utilizing FAS for Housing Assistance, the participant must indicate a need and sign an applicant statement requesting the assistance. Deposits are not allowable. Payment of late fees or interest charges are not allowable. Required documentation for payment includes a copy of a signed lease with the participant's signature; monthly amount due; and a notice of late payment from the landlord. 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. Mortgage payments are not allowable in Northeast Iowa.

If utilizing FAS for Eyeglass Repair, the participant must provide a quote from eyecare center.

If utilizing FAS for Auto Repair, vehicle repair costs may be provided but must be directly linked to an allowable activity. 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.
- c. Valid driver's license.
- d. No cosmetic repairs will be paid using WIOA funds.
- e. Vehicle insurance premiums for up to 6 months are also an allowable expense and is a onetime only payment.
- f. Two quotes for repairs are required unless the vehicle has to be towed.
- g. The participant cannot receive mileage reimbursement and vehicle repairs during the same week.
- h. If vehicle repairs are paid, no transportation will be paid.

Adult, Dislocated Work and Youth maximum expenditure is \$1,000.00 per participant per program year.

---

#### HEALTH CARE (HLC)

Health care assistance could 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. This supportive service should be used only when there are no other resources available to the participant. Maximum expenditure is \$500.00 per participant per program year.

---

#### MISCELLANEOUS SERVICES (MSS)

Updated 10/27/2022. 7/10/2024

Miscellaneous Services (MSS) is intended to provide assistance to participants with support services needs that are not covered through existing support service categories, or in

---

conjunction with existing support service categories, in order to support their career plan.

The cost of required equipment (such as tools) is an allowed MSS expense if required for their WIOA “Title I” sponsored program.

Prior to utilizing MSS for equipment, it must be ensured that if the equipment includes items such as protective gear, for example, that clothing is the appropriate support service. Various fees related employment are allowed (such as background check).

The limit is not to exceed \$1,500.00 per participant. The WIOA service provider’s authorizer must approve all MSS expenses.

---

#### NEEDS RELATED PAYMENTS (NRP)

**Not allowed in Northeast Iowa LWDA.**

---

#### SERVICES FOR INDIVIDUALS WITH DISABILITIES (SID)

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 is allowable. It is not an allowable use of WIOA Title I funds to make capital improvements to a training or work site for general compliance with the Americans with Disabilities Act requirements. Maximum expenditure is \$1,000.00 per participant per program year.

---

#### SUPPORTED EMPLOYMENT AND TRAINING (SET)

Supported employment and training payments are allowable to provide individuals requiring individualized assistance with one-to-one instruction and with the support necessary to enable them to complete occupational skill training and to obtain and retain competitive employment.

SET may only be used in training situations which are designed to prepare the participant for continuing non-supported competitive employment. Employment positions supported at sheltered workshops or similar situations may not utilize SET.

SET may be conducted in conjunction with experimental learning activities such as INT, OJT, SHW, PRE and WEP. Examples of SET use include hiring a mentor, job counselor, or job coach to assist the trainee in adjustment to an OJT situation or hiring a mentor or tutor for one-on-one instruction for a student or hiring a job coach for an individual who has been placed in competitive employment. The length of a Supported Employment and Training contract may not exceed six months. Maximum expenditure is \$1,000 per participant per program year.

---

#### TRANSPORTATION (TRN)

Updated 10/27/2022, 9/11/2023, 5/1/2024, 7/1/2024



Transportation (TRN) may be provided to assist the participant in participation in career and training services as outlined in the Individual Employment Plan (IEP) or Individual Service Strategy (ISS). It may also be provided to assist with transportation to employment for a length of time determined by local policies.

Assistance can consist of per mile reimbursement, parking costs, fuel purchase orders, bus and/or taxi passes and bicycle purchases (bicycle purchases only are capped at \$250.00 per participant per enrollment).

Parking cost, if required to attend scheduled training and approved by the **Title I Director**, may be reimbursed at a rate of fifty (50) cents per hour. Maximum expenditure, excluding purchase of bicycle, is \$3,750.00 per participant per program year.

In addition, youth participants may receive support with driver education costs up to \$600 maximum per enrollment through TRN support service.

The timesheets and the corresponding written request for payment will be submitted no later than the last day of the following month. Written requests for payments submitted later than the last day of the following month may not be paid.

All participants must hold a valid (non-expired) Iowa driver's license to receive mileage reimbursement for the length of the activity, and a copy should be in the file. If a youth is paying a licensed driver for a ride to an activity, the participant does not need a valid Iowa's driver's license but must be case noted as to who would be driving the participant to and from class.

The form of transportation assistance must depend on the participant's location and access to public transportation.

*For example, bus passes are not appropriate for a participant who resides in a rural area with limited or no public transportation, and gas or mileage reimbursement may not be an appropriate choice where public transportation is available and bus passes can be utilized.*

Transportation assistance may be paid in advance based on justification for the transportation cost. Justification must include items such as Google Maps/MapQuest, training schedule, etc. and local approved mileage rates. Advancement of more than 14 calendar days is not allowed with the exception of a monthly bus passes and gas assistance activities. Advancement of more than 14 calendar days must be approved by the NEIWDB Executive Director.

Documentation of transportation must follow policy 8.1.5.1 Support Service, to include the receipt of time and attendance forms for accurate tracking and planning.

Effective 5/1/2024 – Title I will no longer pay Transportation for wage paid activities. This includes Registered Apprenticeship (RA), On-The-Job Training, Work Experience and Internship.

Financial Literacy (FIN) services must be provided to all Title I participants who receive Transportation services. Providing FIN in relation to TRN can be determined by the career planner. For example, if a participant is participating in an Occupational Skills Training (OST) and TRN is a related support services to support the participant in completing training, it may be most appropriate to provide FIN towards the planned end of the OST service in order to assist them in exploring how they will pay for transportation expenses once they are no longer in the OST and no longer receiving TRN.

### **Allowable Transportation Assistance May Include:**

#### **Gas Assistance:**

Mileage Determination (Distance) – The amount allowable is determined from the participant’s home to their destination and back (round trip), which is confirmed by Google Maps and/or MapQuest, training schedule, etc. and local approved mileage rates. These documents must be uploaded in the IowaWORKS case management system in case notes. Gas cards may be used when mileage reimbursement would create a significant hardship and must be approved by the Title I Director. Simultaneous use of gas cards and mileage reimbursement is prohibited. All claims for mileage reimbursement and gas card usage must adhere to the guidelines outlined in this policy and be supported by appropriate documentation.

To qualify for transportation, participants must drive a minimum of 20 miles round-trip to qualify for transportation. The daily rate for transportation will now be based on round-trip mileage.

\$10.00/day	21 – 40 Miles Round-Trip
\$15.00/day	41 – 60 Miles Round-Trip
\$20.00/day	61+ Miles Round-Trip

To determine the allowable transportation cost, use the transportation cost formula:

*Distance (Round Trip) = Daily Rate x Number of Days attended = allowable transportation reimbursement.*

**EXAMPLE:** 50 miles Round Trip = \$15 daily rate X 10 days = \$150.00

**Reimbursement to the participant:** amount is based on the transportation cost formula.

#### **Bus Pass:**

**To a service provider-** The Public Transit Authorization Form that has been set up by the Northeast Iowa Workforce Development Board should be used unless other processes are in place with other specific bus companies. Provide Public Transit Authorization Form to the provider for each participant. A class schedule and/or timesheets must be provided to ensure the travel per activity is accurate.

*For example, a bus pass was provided for 5 days of classroom training; however, the time and attendance form reflects the participant attended 3 days. If the participant misses more than 50% of the weekly scheduled time, a reduction in future bus pass authorizations may be reduced.*

Public transportation must be used whenever feasible unless this would create a hardship based on activity hours and/or childcare commitments.

The type of bus pass, whether it is weekly or monthly, for example, must be based on the frequency of travel per the activity schedule.

- **Per ride-** If the bus pass is paid per ride, determine the frequency of travel based on schedule and/or timesheets whether that is for work, training, school, meetings, etc. and record that in the IowaWORKS case management system as a case note. Upload the Public Transit Authorization Form, and invoice that is provided.
- **Monthly/Bimonthly-** If the bus pass is a monthly pass, justify how the participant will utilize the bus pass in case notes in IowaWORKS. Upload the Public Transit Authorization Form, and invoice that is provided.

### **Ride-Hailing Services:**

Ride-hailing services such as Uber or Lyft may be used when feasible when all other options are not available or would create a hardship.

The amount must be determined based on round-trip from the participant's home to their destination. Justification must include items such as Google Maps and/or MapQuest, training schedule, etc. and local approved mileage rates.

*Distance Round-trip x Frequency x Standard Rate = allowable transportation cost: 50 miles*

*EXAMPLE: Round-trip x 2 trips x \$.35 = \$35*

### **Payment methods and documentation:**

**To a service provider:** Amount is based on the transportation cost formula (see above). The invoice or receipt is uploaded into IowaWORKS. Payment to the provider cannot exceed the allowed transportation cost. If the invoice is less than the allowed transportation cost, the amount on the invoice should be paid. If the invoice is more than the allowed transportation

cost, the amount of the allowed transportation cost should be paid.

---

## YOUTH INCENTIVE PAYMENTS (YIP) AND STIPEND (STI)

Updated 5/17/2023, 7/10/2024

### Introduction

As WIOA youth programs are driven by performance outcomes, incentives encouraging successful completion are beneficial to youth, program providers and local areas. The Northeast Iowa Workforce Development Board (NEIWDB) Youth Incentive and Stipends Policy will ensure that allowable and necessary incentives and/or stipends will be given to WIOA youth participants (ages 14 – 24) to help encourage achievement of goals outlined as part of their Individual Service Strategy (ISS).

### Policy:

1. The criteria for incentive awards are tied to the youth performance outcomes as established by WIOA. Incentives may be awarded to participants based upon their progress and/or achievement of milestones in the program tied to work experience, education, or training outlined in their Individual Service Strategies (ISS).
2. A participant may receive more than one incentive for the achievement of multiple outcomes. Incentives will be awarded to participants through follow-up services. Due to availability of funds, incentive amounts may vary throughout a program year.
3. Incentive and Stipends must be:
  - a. Outlined in writing before the commencement of the program that may provide incentive payments.
  - b. Align with the local program's organizational policies.
  - c. Are in accordance with the requirements contained in the Uniform Administrative Requirements 2 CFR 200 in regard to cost principles and audit requirements for federal awards.
  - d. **Maximum Youth Incentive Payments and Stipends will not exceed \$400.00 per participant/program year.**
  - e. Multiple Incentive Payments and Stipends cannot be taken within a combined Work Readiness activity/curriculum. For example, completion of a Work Readiness curriculum will allow for one Incentive Payment.

### Definitions:

1. Incentive

- a. An incentive is a payment to an enrolled youth participant for successful participation and achievement of expected outcomes as identified in the participant's Individual Service Strategy (ISS).
  - b. The incentive must be linked to attendance or achievement and must be related to training, education, work readiness and or an occupational skills attainment activity that specifically addresses at least one of the fourteen (14) required youth program elements.
  - c. Such achievements must be documented in the IowaWORKS case management system and the participant's ISS.
2. Stipend
- a. The stipend payment must be a lump sum based on attendance, for a specific time frame, and may not be based on an hourly rate to encourage participation. The attendance sheet must be signed by the participant and the instructor before the payment can be made. A copy of the attendance sheet must be maintained in the participant's file.
  - b. The stipend is used as a subsidy and is for activities such as classroom instruction.
  - c. Stipends must be paid based on actual hours of attendance.
  - d. Attendance in the activity must be documented as the basis of stipend payments.
  - e. Payment must be based on actual time of participation in the activity as documented on the attendance sheet.

## ALLOWABLE INCENTIVES AND STIPENDS

### Incentives

Incentive	Amount
High School Diploma	\$150.00
High School Equivalency	\$150.00
High School Grades [A/B/C] (\$150.00 Cap per Semester) <i>Incentives for High School Grades will be awarded based on academic performance in core subjects, including but not limited to Math, Language Arts, Social Studies and Science.</i>	\$40/\$30/\$20
Achievement of Basic Skills/Benchmark Goal	\$50.00
Completion of Workplace Readiness Curriculum	\$50.00
10 Future Economic Opportunity Credits (Max \$200/participant)	\$50.00
Monthly Perfect Attendance for Employment	\$75.00
Credential Attainment	\$75.00
Work-Experience Activity (successful completion)	\$100.00
Employed for both 2 <sup>nd</sup> and 4 <sup>th</sup> Quarter after Exit	\$250.00

### Stipends

Stipend	Amount
9 Hours of High School Equivalency Classes	\$50 per wk.
High School Full Week of Attendance	\$50 per wk.
Class Directly Related to the 14 Youth Services	\$30 per class

## DESCRIPTION AND DOCUMENTATION REQUIREMENTS

1. In order to process the incentive, the required documentation will be placed in the participant's file, documented in the appropriate IowaWORKS screen, and case noted in IowaWORKS demonstrating the criteria to receive the incentive has been met.
2. A completed request form (with supporting documentation) will be submitted for approval to the **Title I Director**.
3. High School Diploma Incentive Award (\$150.00)
  - a. Participants, enrolled in education at the date of participation or at any point during the program, are authorized to receive an incentive award for earning a high school diploma.
  - b. The amount of the incentive is \$150.00
  - c. In order to receive the incentive, documentation, in the form of a copy of the diploma or transcripts, will be submitted.
4. High School Equivalency Incentive Award (\$150.00)
  - a. Participants who earn their high school equivalency after the date of participation, or at any point during the program, are authorized to receive an incentive award for successful completion of the program.
  - b. Participants will receive an incentive of \$150.00 for successful completion.
  - c. In order to receive the incentive, documentation in the form of a copy of the High School Equivalency transcript or comprehensive score report indicating scores will be submitted.
5. High School Grades Incentive Award (\$20-\$40)
  - a. Participants enrolled in high school at the date of participation or at any point during the program, are authorized to receive an incentive award for earning a grade of "C" or better, in each subject, at the end of each formal grading period.
  - b. High School Grade Incentives will not be paid for "C" or better grades at the end of any formal grading period in which the participant earned "F" or "Failing" grades for any High School class/course.
    - i. Participants will be eligible to receive: \$40 for A's, \$30 for B's, and \$20 for C's.
    - ii. In order to receive the incentive, documentation in the form of a formal grade card will be submitted.
    - iii. Participants enrolled in both high school and college courses simultaneously will be eligible for incentives pertaining to high school grades only.
  - c. Participants, enrolled in adult high school at the date of participation or at any point during the program, are authorized to receive an incentive award for earning a passing grade in each subject, upon completion of course.
    - i. Participants will be eligible to receive: \$40 for A's, \$30 for B's, and \$20 for C's.
    - ii. In order to receive the incentive, documentation in the form of a formal grade card will be submitted.

- d. This award shall be given no more than once per course.
- 6. Achievement of Basic Skills/Benchmark Goal Incentive Award (\$50.00)
  - a. In the youth program, goals are determined as part of the ISS.
  - b. Benchmark goals are set to enable participants to receive incentives for accomplishing those benchmarks.
  - c. Goals must be attainable within one year of the date established; if one is accomplished another goal can be set.
  - d. Example goals include but are not limited to:
    - i obtaining unsubsidized employment,
    - ii completing semesters of post-secondary education,
    - iii completion of entrepreneurship courses, attaining a certificate that is not a credential (OSHA 30, etc.),
    - iv basic skills improvement goals,
    - v and any activity that links to the 14 elements and is appropriate for the individual participant.
- 7. Completion of Workplace Readiness Curriculum (\$50.00)
  - a. Participants who successfully complete a Workplace Readiness Curriculum are authorized to receive an incentive award.
  - b. Needs to be a Workplace Readiness and the curriculum needs to be uploaded to IowaWORKS.
- 8. Ten Future Economic Opportunity (FEO) Credits Incentive Award (\$50.00 each )
  - a. A full list of the FEOs can be found in Attachment A. A student must complete 10 credits listed to receive the \$50.00 incentive. *Maximum per program year is \$200.*
  - b. FEO credits cannot be counted/accepted if they were completed prior to enrollment.
- 9. Monthly Perfect Attendance for Employment (\$75.00)
  - a. Participants who are in either subsidized or unsubsidized employment who have a perfect attendance record in any given month will receive a \$75.00 incentive.
  - b. Perfect attendance must be backed up by a timesheet signed by the employer.
  - c. Maximum per program year - \$150.00.
- 10. Achievement of a Credential Incentive Award (\$75 .00)
  - a. Participants enrolled in education at the date of participation or at any point during the program, are authorized to receive an incentive award for attainment of a credential as defined by WIOA.
  - b. The amount of the incentive is \$75.00.
  - c. In order to receive the incentive, documentation in the form of a copy of the degree, certificate, or transcript will be submitted.
- 11. Completion of a Work Experience Activity (\$100.00)
  - a. Participants who successfully complete a Work Experience Activity associated with an ISS identified goal during WIOA youth participation are authorized to



receive an incentive award. This must be a contracted (WEP, LIN, SHW) service. A visit to an employer to see jobs available within an industry does not constitute a work experience activity.

- b. The amount of the incentive is \$100.00.
- c. In order to receive the incentive, documentation in the form of a participant evaluation form will be completed showing satisfactory progress or better on all training objectives and placed in the file. Documentation includes timesheets and progress reports.
- d. Incentive is limited to one per participant.

11. Employed for Both 2<sup>nd</sup> and 4<sup>th</sup> Quarter After Exit Incentive Award (250.00)

- a. As a performance measure, any participant who is successfully employed in both the 2<sup>nd</sup> and 4<sup>th</sup> quarter after exit will receive an incentive in the amount of \$250.

## STIPENDS

1. Stipend payments may not be paid for more than 70 weeks total.

- a. Minimum of 9 Hours of High School Equivalency Classes Stipend (\$50 .00)
  - i A stipend of \$50.00 per week will be awarded to students who attend a documented minimum of 9 hours of High School Equivalency classes in a week.
- b. High School Full Week of Attendance Stipend (\$50.00)
  - i A stipend of \$50 per week will be awarded to enrolled high school students with a documented full week of attendance as defined by school district policy.
- c. Class Directly Related to the 14 Youth Services Stipend (\$30.00)
  - i. A stipend of \$30.00 per class for attending and successfully completing any class directly related to the 14 youth services will be paid to participants.
  - ii. Classes include but are not limited to leadership development, entrepreneurial skills and financial literacy, up to a maximum of \$300.00 per program year.

**ATTACHMENT A:****FUTURE ECONOMIC OPPORTUNITY (FEO) CREDITS**

*Please refer to policy for full requirements.*

ACTIVITIES	CREDIT VALUE
<b>Academic Skills</b>	
Increase at least one grade level in math (Can earn credit only once a month) Non-Basic Skills Deficient only	5
Increase at least one grade level in reading (Can earn credit only once a month) Non-Basic Skills Deficient only	5
Increase typing skills by 10 wpm	2
Complete computer literacy class (Basic Computers, Word and Excel)	5
<b>Occupational</b>	
OSHA 10-hour certification	5
First Aid/ CPR training/certification	5
<b>Career and work readiness</b>	
Create a workable resume	2
Obtain 2 letters of recommendation (non-family)	1
Complete a scholarship application/letter (1 credit for each, up to 5)	1
Complete the FAFSA application (Work through worksheet first with case manager)	1
Attend a college tour	5
Create a workable cover letter	1
Complete LinkedIn Learning course for Entrepreneurship	1
Create LinkedIn profile	2

Participate in job shadowing (min 2 hours)	3
Complete 3 hours of LinkedIn Learning courses	3
Participate in mock interview with another case manager	1
Participate in employer mock interview (Above average Rating)	3
National Career Readiness Certification - at least a Silver	5
Attending a job fair/hiring event and get info for three employers/positions	2
Complete three job applications (verified)	2
Complete a master application and review with case manager	1
Attend a center workshop that does not qualify for a youth stipend	1
<b>Leadership</b>	
Attend City council meetings	1
Participate in community presentations	1
Attend a smoking cessation class (each time)	1
Serve on community committees (each time attend)	1
<b>Personal Growth</b>	
Open a savings account	2
Make monthly deposit into savings account (1 credit per month with minimum \$25 deposit - up to 6 months)	1
Do a budget for housing	2
Complete income tax return	2
Participate in parenting classes (each time)	1
Register to vote	1
Attend class on how to plan a trip (location, transportation, food, and activities)	2

Set up an appropriate email account	1
Create an appropriate voice mail message	1
Obtain a library card	1
Utilize library services monthly (each time)	1
Read a book and write a one-page report (each time)	1
Create appropriate social media page/make current page job appropriate	1
Participate in home visit/family support/human service visit (each time) up to 6	1
<b>Wellness/Leisure</b>	
Attend counseling/treatment classes (each time)	1
Complete a continuing education class/demonstrate skill	5
Attend workout class/session	1
Getting/establishing medical and dental providers	1

## APPENDIX

### APPENDIX A: WAIVER REQUEST

#### Request for Waiver

If Title I seeks an exception from a local NEIWDB policy, they must submit a waiver request form to the board's Executive Director. These requests will be evaluated individually, and the waiver form should provide a thorough justification for the exception.

Date Submitted:		Type of Waiver Requested:	
Participant Name:			
State ID:			
Program:			

Provide a summary of the request (including justification of request and need of participant)

--

Service Provider Authorized Representative Signature: \_\_\_\_\_

**NEIWDB Response:**    Approved: ☐ Yes    ☐ No

\_\_\_\_\_

NEIWDB Executive Director Signature

Date