## FutureSkills Career Technical Initiative (CTI) Participant Guidance Policy Q&A

**Q1:** I feel we are excluding an important population of youth who should be eligible for this grant funding opportunity. I feel the policy should state 17 and above as there is a population of students who start school early because of their age and date of birth. Allowing this age group, would give these youth the opportunity to attend and enhance their outcomes. Age an individual must be 18 years of age or older when training provided through CTI is complete to participate in CTI.

**A1:** MDCS and CommCorp believe that the requirement to be age 18 upon completion of CTI training aligns with the targeted population these programs are meant for; those unemployed and underemployed.

**Q2:** The current requirement for securing employment in 30 days should be extended to 60 days to allow the Workforce, School and student to secure appropriate employment.

**A2:** MDCS and CommCorp are unsure of where this requirement is documented. Goals for attainment and follow-up services regarding obtaining employment should be outlined as part of a local areas MOA with their CTI provider.

**Q3:** Page #1, Background: Through the FutureSkills (Upskilling) Program, the Workforce Skills Cabinet Quotes are unnecessary; and not utilized throughout the rest of the document.

A3: This has been modified.

**Q4:** Page #3: First referenced as MOU/MOA; update previous reference to maintain consistency.

**A4:** The terminology of MOA has been updated throughout the Issuance and attachments.

**Q5:** Page #4: Section is unclear:

It's strongly encouraged for the parties to create an outline of the key functions (i.e., workflow chart) to ensure each partner understands and agrees to how customers will flow through the program process.

**A5:** This has been updated for clarification in the issuance.

**Q6:** Page #4: If collection is necessary I'm not sure what "or request" means here.

Additionally, if collection is required perhaps "should" might be replaced with "must" to remove any ambiguity.

**A6:** This has been updated for clarification in the issuance.

**Q7:** Page #6: Unclear Statement:

**Program-Specific Entry Requirements** In addition to FutureSkills eligibility criteria, each school may have additional eligibility criteria required or suggested for entry into the program. CTI schools are encouraged to limit these additional program-specific eligibility criteria to those that

are required for employment. CTI schools should consider the following questions and share this information with the MCC Upskilling Navigator, to ensure successful recruitment and screening. These questions may also help determine if an individual intends to work in a job related to training. Some of these questions may not directly result in selection. However, they may be important for the job seeker to understand their best fit for employment. Then work with their Upskilling Navigator to develop a plan to successfully complete the chosen program. and obtain employment in that field.

**A7:** This has been updated for clarification in the issuance.

**Q8:** Is it recommended to develop one master MOU, or individual MOUs with all the CTI grantees that fall within our local area?

**A8:** It's recommended MassHire Career Centers have an individual MOA with each of the CTI grantees, as there may be different functions that need to be outlined.

**Q9:** Since there is no SDA requirement for eligible FutureSkills participants, if they are accepted to a CTI school outside of our region, do we need our MOU for that region as well? Or do we send participants to the career center that falls within that SDA who may already have an MOU with that CTI grantee?

**A9:** Since it's assumed out-of-region referrals are far and few between, we encourage CTI providers and MCC's to be able to resolve these unique circumstances without an MOA. If increased activity provides a need for an MOA, then local areas should be able to negotiate into an MOA.

**Q10:** Is this issuance related ONLY to FutureSkills CTI or ALL FutureSkills programming? I read it as only CTI but want to confirm.

**A10:** Yes, the Issuance is only relevant for CTI, as the MassHire Career Centers are required partners.

**Q11:** Will the Schools/Grant leads be sent this same information so that they are in the loop as far as our requirements and the clarification that we may need to update current MOUs/MOAs to match the new issuance? I understand we will have local conversations and having the same information is helpful for those conversations.

**A11:** Yes, once this issuance is finalized, CommCorp will send the Issuance and supporting attachments to CTI grantees.

**Q12:** Does the CCS have to be a requirement? It adds another layer that may not be necessary and many referrals are sent to the Career Centers with very little time to complete all of the tasks. We request that we "inform" customers of the CCS but not "require" it.

**A12:** Yes, the CCS is a requirement as it will help the job seeker with re-employment goals.

Q13: Eligibility - I understand individual must be MA resident. Please confirm that if they live in a commuter state and are collecting MA UI they are not eligible. Must LIVE in MA?

A13: Eligible participants must be MA residents, not from a commuter state.

Q14: Is there a specific form for self-attestation? Should we use the WIOA applicant statement? If there is a form or guidelines can that be included in the issuance?

A14: MDCS requests MCC's utilize Attachment E: MassHire Career Center Self Attestation has been created and added to the Issuance.

**Q15:** Is Attachment A only required if the school refers the customer to the CC? And, if they do, will we be monitored on having this in the folder? We already gather this info in JobQuest and the app is redundant for the career center.

**A15:** Yes, Attachment A is Commonwealth Corporation's Participant Registration Form is completed by job seekers and/or CTI provider. Attachment A will be shared MCCs as it provides authorization for the CTI School to share the jobseeker's information with the Career Center. A participant folder is needed to keep the record or release.

**Q16:** There is no mention of securely transmitting PII information between training provider and career center or when collecting from the participant. Can something be added to the issuance as a reminder that PII must be sent adhering to other MDCS issuances in relation to PII so that the training provider/lead understand our responsibilities related to PII.

**A16:** This has been updated for clarification in the issuance.

**Q17:** If the training provider collects the eligibility documents and sends us the Staff attestation form is that enough for us to enroll the customer in MOSES? --- Attachment A and B will be provided. Or does the training provider have to send us the eligibility docs as well? What will be required at monitoring of the career centers when the training provider collects and determines eligibility vs. When the career center does?

**A17:** If CTI school is determining eligibility the MassHire Career Centers will receive Attachment A and B and they must be kept on file. If the MassHire Career Center is determining eligibility, then the MCCs are responsible for keeping documentation on file and providing attachments B and C to the CTI School.

The following would be helpful on the Eligibility Documentation attachment:

- Separate the 4 categories of eligibility so they don't run into each other and it is clear for Career Advisors/Managers
  - Category 1: Either Unemployed or Underemployed only need to fit one category and only need one document
  - Category 2: Massachusetts residency need one document
  - Category 3: Age need one document
  - Category 4: Work Authorization

This has been updated for clarification in the issuance and please refer to Attachment D.

Q18: As part of the introduction statement, state If a document can be used for multiple categories then that is acceptable. Covering compliance with the least amount of documents.

A18: This has been updated for clarification in the issuance and please refer to Attachment D.

**Q19:** As part of introduction statement, state that self-attestation can be used in Category 1, 2 or 3 but not Category 4 and include template/form/example (*WIOA applicant statement* 

requires a corroborating witness) – is that required for this or just a signed statement from the customer? The applicant statement we use for WIOA also has language on it in relation to the accuracy of the information the customer is providing.

A19: This has been updated for clarification in the issuance and please refer to Attachment E.

**Q20:** Under Unemployment it states we can accept Monetary determination – just confirming as that does not necessarily mean they will be eligible to collect but shows what they might receive if determined eligible.

**A20:** Attachment D, under the Determining Unemployment section has been updated to reflect that a claimant must be collecting UI. It is correct that a claimant may have an eligible monetary but is determined ineligible for different reasons, separation, severance, availability, etc.

**Q21:** Under MA residency – Is a MA Driver's license with current address acceptable? If this is meant to be included under "current and valid state issued ID" it would help to add including MA Driver's license.

**A21:** This has been updated for clarification in the issuance and please refer to Attachment D.

**Q22:** Under MA residency – Would a current lease be acceptable if it has the person's name and address?

**A22:** This has been updated for clarification in the issuance and please refer to Attachment D.

**Q23:** Under Work Authorization – It states that this can be proved by the fact that someone is currently collecting Unemployment – we have never seen that as acceptable before so confirming? - And this would have to be that they are actually COLLECTING? Yes?

A23: This has been updated for clarification in the issuance and please refer to Attachment D.

**Q24:** Can a checklist for monitoring be added somewhere so that it is really clear when we are monitored again and it is consistent:

- Documents Career Center must have in customer folder:
  - Commcorp App Is this something we need to have on file? If so, for all customers or only when the school makes the referral?
  - Release of Information
  - Staff attestation is this required in the folder regardless of which way the referral is made?
  - Document that proves Unemployed OR Underemployed
  - Document proving age
  - Document proving residency
  - Document proving Work authorization
  - Anything else?

**A24:** This has been updated for clarification in the issuance.

**Q25:** Program Specific Entry Requirements - There is a list of suggested questions, I suggest adding "Does the school require CORI to attend training?" Most vocational schools do and this

needs to be determined at intake – these were just examples, however we have added this question

**A25:** This has been updated for clarification in the issuance.

**Q26:** The draft policy encourages co-enrollment in WIOA whenever possible. The policy only has language referring to the participant side of WIOA eligibility. There is no language regarding approval of a CTI course on the State's Eligible Training Provider list for Section 30 or ITA funding.

**A26:** All CTI courses have been entered into MOSES by MDCS and are in the process of being reviewed by DUA for a Section 30 determination under a special DUA Waiver for ARPA funded CTI programming. As these courses are funded with ARPA funding, ITA approval is not required. The jobseeker's co-enrollment with WIOA does not require courses to be ITA approved either, as co-enrollment will likely be for other benefits and services; not training funds.

**Q27:** Include language in the MOU template that requires Chapter 74 schools with CTI programs to enter course information in Training Pro and requires Workforce Boards to follow up and locally approve CTI programs for ITA funding in a timely manner.

**A27:** CTI Schools have not received training on entering their courses into TrainingPro, such action has been completed by MDCS.

**Q28:** Develop a process to integrate an automatic approval for the ETPL for any CTI program that receives approval from Commonwealth Corporation. This may include modifying the CTI program approval process or criteria in the RFP that closely mirrors program eligibility for Section 30 and ITA funding.

**A28:** Commonwealth Corporation has been briefed on Section 30 approval criteria for potential modification of the RFP for CTI programming after ARPA funding.