MASSACHUSETTS

Workforce Investment Act

WIA Communication No. 01-34   ☑ Policy   ☐ Information

To: Chief Elected Officials
Workforce Investment Board Chairs
Workforce Investment Board Directors
Title I Administrators
Career Center Directors
Title I Fiscal Officers
DET Regional Directors
DET Area Directors

cc: WIA State Partners

From: Angelo Buonopane, Director
Department of Labor and Workforce Development

Date: July 25, 2001

Subject:

- Documentation Requirements for Adults and Dislocated Workers Receiving Intensive and Training Services.
- Documentation Requirements for Youth.

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Purpose:

- To provide guidance to Local Workforce Investment Boards, One Stop Career Centers and Service Providers regarding the elements of documentation required for adults and dislocated workers participating in the Massachusetts Workforce Development system and accessing intensive and training services

- To provide guidance to Local Workforce Investment Boards, Youth Councils, One-Stop Career Centers, youth program design framework providers, and Youth Service Providers regarding the elements of documentation required for youth accessing the WIA Youth Program Elements.

- This policy expands upon Policy 00-14 Revised, Title I Eligibility Requirements providing further guidance regarding documentation requirements for customers accessing intensive and training services.

Background: **Adult/Dislocated Worker**

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The Workforce Investment Act provides for streamlined services through better integration in the One-Stop delivery system. Programs and providers co-locate, coordinate and integrate activities and information so that the system as a whole is coherent and accessible for businesses and individuals alike. Individuals will be empowered through the advice, guidance and support available through the One-Stop system, and the activities of the One-Stop partners.

Customers are assessed for purposes of determining whether they require services or training that are not universally available. As part of the assessment process, information is collected in order to ensure individuals are provided optimal opportunity to explore the services available at the One Stop Career Centers or are referred, as appropriate, to other services. This information includes but is not limited to demographic data elements, personal information and employment history.

The documentation requirements outlined herein are for the purposes of capturing information specified in the Act and Regulations pursuant to
1) Case Management – assisting the customer in determining the mix of services that is best suited to the individual's employment/earnings needs, time constraints, learning style and career goal;
2) need for intensive and/or training services;
3) training program participation/job placement;
4) follow up services.

The Commonwealth Corporation continues to work with the Division of Employment and Training and local area representatives toward integrating and organizing the required information within the Massachusetts One-Stop Employment System (MOSES).

Policy: Each local area must develop a policy and procedures for the documentation of information specified in the sections below. Local areas may exercise flexibility in the format used to capture the required information, which can be documented in a paper-based system or electronically.

Effective: Immediately

References: Workforce Investment Act Section 134
Workforce Investment Act Regulations at 20 CFR §663.160, 220, 230, 240 and 310
CBWL Title I Eligibility Policy 00-14, Revised
WIA Communication 00-15, Revised: Massachusetts ITA System

Inquiries: Questions regarding WIA Title I should be directed to Gregg McCutcheon at Commonwealth Corporation (617) 727-8158.

Questions regarding Wagner Peyser services should be directed to Eileen Zewski at (617) 626-5686.

Filing: Please file this in your notebook of previously issued WIA Communication Series Issuances as #01-35.

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Documentation of Service Strategies for Adults and Dislocated Workers

This policy provides guidance on documenting service strategy decisions and justifications consistent with Workforce Investment Act regulations. It includes procedures outlined in Policy 00-14 Revised, *WIA Title I Eligibility* and WIA Communication 00-15 Revised, *Individual Training Accounts*. Documentation, for the purposes of this policy, refers to the recording of information that demonstrates the determination of the need for intensive services and/or training services and information that was evaluated in order to reach that determination.

Access to Intensive Services

There are two categories of adults and dislocated workers who may receive intensive services:
a) Adults and dislocated workers who are unemployed, have received at least one core service, and are determined to be in need of more intensive services to obtain employment; and
b) Adults and dislocated workers who are employed, have received at least one core service and are unable to obtain employment through core services, and are determined to be in need of more intensive services to obtain or retain employment *that leads to self-sufficiency*. §663.220

Documentation The participant's case file must contain a determination of the need for intensive services as established by the initial assessment or the individual's inability to obtain employment through the core services provided. §663.160(b)

Access to Training Services

Training services may be made available to employed and unemployed adults and dislocated workers who have met the eligibility requirements for intensive services, have received at least one intensive service and have been determined to be unable to obtain or retain employment through such services. §663.310

Documentation The participant's case file must contain a determination of the need for training services, as identified in the individual employment plan, comprehensive assessment, or through any other intensive services received. §663.240(b)

Please note: There is no minimum time period and there is no minimum set of services that a participant must complete before advancing from core to intensive services, or from intensive to training services. Nothing in the Act, the Rule or this policy should be interpreted to mean that a customer is required to complete or even to conduct a job search prior to receiving services in any service category for which they are eligible. In addition, participants may receive services from more than one tier or all three tiers simultaneously, according to individual needs.

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Required Documentation

1. For intensive services, documentation of eligibility; documentation of the need for services, including record of prior core services, assessment, and/or demonstration of the inability to obtain employment [134(d)(3)(A); §663.160].

2. If employed, for intensive services, documentation of need for services to obtain or retain job that leads to self-sufficiency (as defined by local area) [134(d)(3)(A); §663.220,230

3. For intensive and training services, documentation as to how the individual meets the priority for service categories of Public Assistance and Low income or other additional barriers as defined by the local area. 134(d)(4)(E); §663.220 (Note: This does not apply to dislocated workers)

4. For training, documentation that (Reference: [134(d)(4)(A-B); §663.240; §663.310]):

- customer is eligible under WIA (please refer to Title I Eligibility Policy 00-14 Revised);
- at least one intensive service has been provided;
- participant is unable to obtain employment through intensive services;
- participant has had an assessment (interview or evaluation) and case management;
- participant has been determined by one-stop operator to be in need of training services;
- participant has been determined to have the skills and qualifications to successfully participate in training;
- current labor market exists for training-related occupation (employment goal; job title; salary range);
- individual requires assistance (and such assistance is available) in addition to Pell grants or any other assistance for which the individual is eligible.

NOTE: For adults and dislocated workers, the requirements for training (assessment, case management, training strategy) are consistent with the definition of an <u>*individual employment plan*</u> *(§663.245).* **The local workforce investment area may determine the actual method/document used to capture the information.**

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The chart that follows should be used as a guide to ensure that required documentation for intensive and training services is appropriately recorded.

Required Documentation for Customers Receiving Intensive or Training Services	Components

Assessment
 	
Basic Skills*
Occupational Skills/Abilities
Aptitudes
Interests
 	
*Note:
(1) Reading and math scores must be recorded for all adults and dislocated workers receiving Title I training services.
(2) Assessment of basic skills is <u>strongly recommended</u> for adults and dislocated workers receiving intensive services.
(3) Individuals with post-secondary education may be exempted from testing.
	▪ Instrument Name
	▪ Date Administered
	▪ Score/Outcome
	▪ Analysis (if appropriate)
	▪ Other (e.g. portfolio)
	  Explain:
	▪ Assessment not completed
	  Explain:

Work History Summary *Translates relevant raw data into short, detailed summary of work history.*	*List Prior Relevant Employment and include the following*: ▪ Responsibilities ▪ Reason for Leaving Prior Jobs ▪ If Not Applicable, please explain.
Skills Analysis *Creates profile of the customer, focuses on key skill and traits.*	▪ Hard Skills ▪ Soft Skills ▪ Strengths/Weaknesses ▪ Not Completed (explain) *Include information from military service, volunteer work and hobbies, when <u>relevant.</u>*

Required Documentation for Customers Receiving Intensive or Training Services	Components
Education **Training** **Certification**	Educational information including: ▪ Last grade completed ▪ Degrees/Diplomas ▪ Licenses/Certifications ▪ Adult Education Courses/Specialized Training <u>if relevant.</u> ▪ Other (explain) ▪ None (explain) *Include item(s) and date (year) of attainment.*
Labor Market for Current Skills *Identifies current labor market for <u>transferable skills</u> gained through prior employment and related experiences.*	*(1) Documentation must corroborate why the customer can or cannot find suitable employment.* *(2) This would reference items such as industry in decline, obsolete technical skills, and lack of work history.* *(3) Diagnosis should contain accurate, substantiated information that references reliable sources* *(4) If not applicable, please explain*
Barriers to Employment *Documentation of barriers that may impact successful participation in job search, training and/or sustained employment and <u>plan to address.</u>*	▪ Barrier name ▪ Brief description ▪ Brief response ▪ None
Employment Goal *Documents the culmination of the case plan processes, including labor market research and examination of marketability.*	▪ Identified employment goal (industry area, job title) ▪ Wage range ▪ Labor market findings to support choice for occupation

Required Documentation for Customers Receiving Intensive or Training Services	Components
Training Justification *Documents the factors that support the determination that training is warranted.*	***All must apply and must be clearly documented in customer file:*** ▪ Customer has met WIA eligibility requirements. ▪ Customer has been determined to be eligible for training services based upon prioritization that may be defined by a local area as a result of limited funding. ▪ Customer has received at least one intensive service. ▪ Customer has been determined to be unable to obtain or retain employment that leads to self-sufficiency. ▪ After assessment (interview, evaluation), customer has been determined to be in need of training services. ▪ Customer has been determined to have skills and qualifications to successfully participate in training. ▪ Labor market data indicates that jobs exist in an occupational area related to the training choice. ▪ Pell grants and other forms of grant assistance have been taken into consideration and applied when available toward the cost of the individual's training. ▪ Sufficient funds have been identified to allow the customer to complete training.
Training Program	▪ School/Vendor ▪ Course(s) Name ▪ # Hours per Week ▪ Start/End Dates
Support Services **Needs-Related Payments**	▪ Type of Service ▪ Funding Source ▪ Eligibility Determination Consistent with Local Policy
Job Placement Information	▪ Employer Name, Address, Telephone ▪ Contact Person ▪ Wage, Hours, Benefits

Required Documentation for Customers Receiving Intensive or Training Services	Components
Follow Up Services Available *for participants in workforce investment activities who are placed in unsubsidized employment for not less than 12 months after the first day of employment, as appropriate.* §134(d)(2)(K)	▪ Services Requested ▪ Services Provided ▪ Provider(s) ▪ Duration/Intensity ▪ Not Applicable (explain)
Customer Contact Notes *Document specific information regarding customer's progress, change of status, etc.*	▪ Entries in chronological order ▪ Regular, reasonable contact is expected

Documentation of Information for Youth

Background

The Workforce Investment Act of 1998 (WIA) gives communities an opportunity to connect employment, education, and youth development services into a broader, more coordinated youth system. WIA moves away from one-time, short-term interventions for youth and encourages a systematic approach where communities offer networked services, including opportunities for academic and occupational learning; development of leadership skills; preparation for further education, additional training and eventual employment. The youth development perspective asks communities to organize services along a continuum that youth access over time as they are developmentally ready.

Providing services over the long term through a network of youth providers dramatically changes the documentation necessary to make the system work. At the front end, the process of intake, eligibility determination, and enrollment is fairly straightforward. And, in general, it doesn't look much different than the process followed under JTPA. The information documentation necessary to determine eligibility and enrollment is set forth in WIA Communication No. 00-14.

Documentation for the remaining steps of the WIA youth system is more complex and necessarily open-ended. Consider these factors:

▪ Local youth programs must document the process of objective assessment that shapes the initial individual service strategy for each youth. Since WIA encompasses a broad range of ten program elements, the assessment is itself broad – and must include an assessment of academic skills, career development and workplace preparation, youth development needs, and support service needs.

▪ Since each youth's service strategy draws from multiple providers, the networked youth development system places a strong focus on the case management process. From this perspective, 'documentation' includes the process through which service delivery and results are entered on a youth's case file – as a way of informing the case manager and subsequent providers about the full history of a youth's WIA service involvement.

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- A youth who begins involvement with the WIA system at age 14 may continue to receive youth services in the WIA system for several years. The 'case file' and supporting documentation required thus must be left open to accommodate differences in a youth's developmental needs as they change over time. The system needs to be able to document goals, services, the attainment of goals, and the setting of new or additional goals.

- Finally, many components of a coordinated, comprehensive youth development system are not yet fully in place. Both state policy as well as local experience will likely redefine services, measures, and system standards into the future. Thus, the documentation that works today may change as we gain a greater understanding of effective techniques.

Policy

WIA requires an objective assessment of the academic levels, skill levels, occupational skills, employability skills (including interests and aptitudes for non-traditional jobs, if appropriate) and service needs of each participant. Additionally, WIA requires the development of service strategies for each participant that identifies at least one Basic*, Occupational or Work Readiness Goal each year and includes appropriate services for the youth to effectively meet his/her specific needs.

*All younger youth who are determined to be basic skills deficient (that is, has English reading, writing, or computing skills at less than the 8th grade level on a generally accepted standardized test or a comparable score on a criterion-referenced test) must have a basic skills goal.

It is unlikely that any organization providing the WIA program design framework services will always complete a full objective assessment prior to actually beginning youth services. The assessment process should be grounded in practicality; it is not always the case that assessment will be completed sequentially before services begin. Involving youth in a burdensome data gathering process may scare some youth away before they actually can begin substantive services. In addition, it is unlikely to expect some youth to willingly provide personal details about his/her past, especially when that history may be uneven. Finally, we face the reality that objective assessment should not be interpreted as a one-time snapshot of youth needs. Assessment in the context of long-term youth development should be fairly open-ended. Service providers and case managers should regularly update and revise the record of youth assessment over time as services are provided and youth develop in different ways.

[Note: If provider determines it is appropriate to use a recent assessment or individual service strategy developed for the participant pursuant to another education or training program, a new assessment is not required. The alternative assessment or service strategy must contain substantially the same elements outlined below. [129(c)(1)(A)&(B)]

Required Documentation. The following items are required to be documented for each eligible youth.

Educational Background

- Whether the youth is currently enrolled in, and attending classes at, an educational institution (school, community college, proprietary institution or alternative education program).

- Name and location of last school or educational institution attended

- Highest school grade or education level completed; date of completion

- List all completion certificates, high school diploma, degree programs completed, or other certificates earned, together with date(s) earned.

Objective Assessment – for all assessments, record the name of the test or tool used in the assessment, the 'score' and date administered. [Some instruments require administration and interpretation by a trained individual. If you are using such an instrument, record the name of the person who administered the instrument.]

- **Assets & Strengths** –WIA encourages a youth development approach to youth services – in part, this means building on a youth's assets rather than simply 'fixing problems.' A comprehensive objective assessment should include the use of a standard tool that collects information about a youth's strengths, assets and interests. One such tool is the Youth Asset Mapping Survey published by the Search Institute (http://www.search-institute.org/assets/}. There are other asset-based tools available.

- **Career Interests & Aptitudes** – Use standard tool such as The Harrington -O'Shea Career Decision Making System, Self-Directed Search, CEI.

- **Basic skills** – To the extent possible, obtain results of standardized tests such as the Massachusetts Comprehensive Assessment System (MCAS) from the youth or from partner schools. If MCAS results are not available, assess basic skills using a standard tool such as GATB or TABE.

- **Occupational Skills** – Assessment of occupational skills is required only for youth who are seeking placement into a job, not for youth who are still enrolled in school or for whom an educational program is the highest near-term priority.

  As the state develops its Certificate of Occupational Proficiency (under the 1993 Education Reform Act), we will work to connect occupational assessment to the COP process.

- **Work Experience** – Document job title, employer, and dates of employment or experience for all internships, job shadows, summer jobs, part-time jobs and full-time jobs that youth has experienced. List job responsibilities and hourly wage.

Workbased Learning Competencies – All summer employment or work experiences funded using WIA youth grants must use the Massachusetts Work-based Learning Plan to structure the work experience as a formal learning opportunity. A youth's individual service strategy should include an analysis of whether the youth has previously mastered any of the nine competencies included within the MWBLP – in order that future work experience be focused on building skills and competencies that need continued development, rather than focus on competencies in which the youth has already demonstrated proficiency.

Career Pathway Documentation

- Document whether the youth has enrolled in a career pathway or cluster as a part of a sequence of classes at an educational institution. [Note: use the sixteen career cluster definitions developed

by the United States Department of Education for implementation through the Carl Perkins Career and Technical Education Act. Currently, Massachusetts has seven clusters that were approved prior to issuance of the sixteen United States Department of Education career clusters.]

- If the youth has not previously elected on a career pathway or cluster, document – using the interest inventory, a recognized career development instrument, or similar resource, – a tentative career area that can be used to focus work placements or summer jobs.

Support Service needs

Linkages to community services – identify the types of support services that will help meet the youth's needs; include all documentation necessary to demonstrate such need; ensure eligibility determination is consistent with local policy.   The following list is not all-inclusive

- **Assistance with transportation**– identify the types of support services that will help meet the youth's transportation needs; include all documentation necessary to demonstrate such need.

- **Assistance with child care and dependent care** – identify the types of support services of that will help meet the youth's child care or dependent care needs; include all documentation necessary to demonstrate such need.

- **Assistance with housing** – identify the types of support services that will help meet the youth's housing needs; include all documentation necessary to demonstrate such need.

- **Referrals to medical services** – identify the types of support services that will help meet the youth's medical, dental, and mental health needs; include all documentation necessary to demonstrate such need.

- **Assistance with uniforms or other appropriate work attire and work-related tools, including such item**s as eye glasses and protective **eye gear** – identify the types of support services that will help meet the youth's uniform or work attire needs; include all documentation necessary to demonstrate such need.

Individual Service Strategy –Develop a plan of action for each youth participant based on information from the objective assessment. Describe the specific services planned. Identify the type of goal (basic, work readiness and occupational) as well as the date the goal was established and the date the goal was attained. Provide linkage between academic and occupational learning by using the Massachusetts Work-based Learning Competencies for all summer employment and work experiences.   Amendments to ISS should be made whenever a change in the plan of action occurs.

Youth Program Elements – Record each program element that the youth receives; identify each provider; document the start and end date of each service and outcomes. Include progress notes.

Follow-up Services – Record how follow-up services will be provided. Document the organization responsible. List and document the follow-up services as they are completed, including start and end dates.

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