COLORADO
Department of Labor and Employment

Workforce Development Programs
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Category/Subject:	Sector Partnership National Emergency Grant
Colorado Policy Guidance Letter#: GRT-2015-02, Change 1	
Revise/Replace PGL#:	GRT-2015-02 (prior#15-14-NEG)
Date: June 7, 2016	
Distribution:	CDLE Management, State/Local Workforce Directors & Staff

June 2016 Changes Highlighted

I. REFERENCE(S):

- Workforce Innovation and Opportunity Act (WIOA), section 170, Public Law (Pub.L.) 113-128, enacted July 22, 2014;
- Workforce Investment Act of 1998, 20 CFR 671 for National Emergency Grants;
- Training and Employment Guidance Letter (TEGL) #31-14 Sector Partnership National Emergency Grant;
- TEGL #2-15 Operational Guidance for National Dislocated Worker Grants, pursuant to WIOA;
- TEGL #3-15 Guidance on Services Provided through the Adult and Dislocated Worker Program under WIOA and Wagner-Peyser, as Amended by WIOA, and Guidance for the Transition to WIOA Services;
- TEGL # 39-11 Guidance on the Handling and Protection of Personally Identifiable Information;
- TEGL #15-10 Increasing Credential, Degree, and Certificate Attainment by Participants of the Public Workforce System, dated December 15, 2010;
- Policy Guidance Letter (PGL) WIOA-2015-05, WIOA Title I Eligibility;
- PGL ADM-2015-02, Performance and Compliance Review Process;
- PGL VET-2014-02, Priority of Services for Veterans and Eligible Spouses;
- PGL ADM-2001-01, WIA Internal and Subcontractor Monitoring;
- PGL FIN-2016-01, Notice of Funding Availability and Expenditure Authorization Procedures;
- PGL WP-2013-02, Virtual Job Fairs;
- PGL WIOA/WIA 2014-01, On-the-Job Training;
- PGL WIOA/WIA 2012-01, Incumbent Worker Training.

II. PURPOSE:

To provide policy, information, guidelines, and programmatic requirements for Local Workforce Development Boards and Local Areas to implement the **Sector Partnership National Emergency Grant (SP NEG).** Grant funds are awarded under the National Emergency Grants Program in accordance with the Workforce Investment Act of 1998, Public Law # 105-220 (codified as amended at 29 U.S.C. 2801 et seq) and section 173; the NEG regulations at 20 CFR Part 671; the NEG application guidelines and subsequent policy guidance; and the funds appropriated for Program Year (PY) 2014 (including any FY15 Advance Funds).

III. BACKGROUND:

NEGs are discretionary grants awarded by the Secretary of Labor under Sec 173 of WIA to provide employment-related services for dislocated workers. This funding is intended to temporarily expand capacity to serve dislocated workers and meet the increased demand for employment and training services with the goal of quickly reemploying laid off workers and enhancing their employability and earnings.

To support an American economy that provides opportunity for all, workers must have skills that align with the needs of businesses and must be readily able to adapt as business needs evolve. States and local areas are strategically positioned to support a job-driven approach to workforce development through sector partnerships and sector strategies. Sector strategies are regional, industry-focused approaches to workforce and economic development that improve access to good jobs and increase job quality in ways that strengthen an industry's workforce. These strategies bring together partnerships among businesses, training providers, labor unions, community organizations, workforce development organizations, and other key stakeholders around specific industries to address the workforce needs of both businesses and workers.

Sector strategies represent a strategic and demand-driven way for workforce organizations to conduct business, moving from a "program administration" focus to a more proactive role building regional talent pipelines, addressing skill shortages, and creating meaningful career pathways for a range of workers in important regional industries. A demand-driven full-scale sector strategy means putting the business community at the center and thinking more broadly about what a workforce organization or intermediary can do to help businesses thrive and grow, resulting in new employment opportunities for dislocated workers.

Sector partnerships are fundamental to effective sector strategies, and the Department of Labor and Employment has structured the SP NEG opportunity to advance and complement the more integrated and comprehensive dislocated worker services envisioned by WIOA. The SP NEGs are intended to provide new services and flexibilities that can be integrated with WIOA, not simply to supplement or replenish regular WIA Dislocated Worker formula funds. The specific activities targeted by these grants serving dislocated workers include regional sector planning and strategies, enhanced career services to dislocated workers, and work-based training opportunities.

IV: POLICY/ACTION:

A. Period of Performance

The overall grant period of performance runs from July 1, 2015, through June 30, 2017. Participating local areas may begin obligating and accruing funds after they receive a Notice of Fund Availability (NFA).

B. Local Area Participation

The following local areas are participating in this SP NEG: Adams County, AD/Works!, Boulder County, Larimer County, Mesa County, Weld County, and the Rural Consortium (including the sub-areas: Broomfield, Northwest, Pueblo, Rural Resort, Southeast, South Central, and Western).

C. Participant Eligibility

Dislocated workers (as defined under WIOA) are eligible participants in SP NEGs. Generally, a dislocated worker is an unemployed individual with previous attachment to the workforce who was laid off. For a full definition of dislocated worker eligibility, see WIOA section 3(15) and PGL 15-09-WIOA, Attachment 2.

Local areas should use labor market information to appropriately target outreach and services to dislocated worker populations, including those that may have additional barriers or challenges to reemployment, such as:

- Long-term unemployed jobseekers (unemployed for at least 27 weeks in aggregate over the past year),
- Unemployment Insurance claimants profiled as likely to exhaust their benefits,
- Foreign trained workers that have faced barriers to obtaining employment in their field or profession,
- Older, out-of-school youth, and
- Veterans.

The long-term unemployed must have been unemployed for 27 weeks or more and still meet regular DW eligibility requirements using one of the allowable categories. Under WIOA, there is no time limit on when the true job of dislocation occurs – see Job of Dislocation definition in PGL 15-09 –WIOA, Attachment 2.

Similar to other ETA-funded programs, veterans will receive priority of service for training and services made available under SP NEGs, as required by the Jobs for Veterans Act and described in TEGL 10-09. As clarified in TEGL 22-04, separating service members are generally considered to have satisfied the termination component of the WIA definition of a dislocated worker. Therefore, as long as a separating service member satisfies the other criteria for dislocated worker eligibility, including the requirement that the individual is "unlikely to return to a previous industry or occupation," he or she would generally be an eligible dislocated worker under SP NEGs. Coordination with intensive and case management services that are provided to unemployed post-9/11 era veterans is strongly encouraged.

D. Recruitment of Participants

Local areas should use Labor Market Information (LMI) to appropriately target outreach and services to dislocated worker populations. Coordination with Unemployment Insurance (UI) programs is strongly encouraged to ensure that UI claimants, individuals who have exhausted UI benefits, and other dislocated workers encountering long-term unemployment are contacted regarding the services available through this program to help them navigate entry into new careers. Referrals from other partners and programs are also encouraged.

E. Project Planning

Recognizing WIOA's emphasis on regional planning and sector strategies and the benefits these activities can provide to better serve job seekers, including dislocated workers, a portion of the SP NEG must be used to fund activities that support regional planning and sector strategies. These activities may support the development of new sector strategies, or updates and expansion of preexisting regional or local plans and strategies.

Regional planning and sector strategies support dislocated workers by assessing the regional economic landscape to identify new or growing employment opportunities in the region. They also help ensure partnerships and regional assets from the workforce investment system, industry, community colleges, labor unions, nonprofits and other stakeholders are aligned and integrated under strategies that can be used to respond to

economic shocks, such as plant closings, natural disasters, and long-term unemployment within the regional workforce.

The sectors or industries that are selected for this grant must be data driven, and labor market information for the local area or economic region must be reviewed as part of the industry selection process. At least one industry of focus must be selected by each local area, with a minimum involvement of three employers in the local area or region that represent the industry of focus. The names of employer partners must be included in the narrative section of the project plan.

Employers, regional industry representatives, and national industry representatives (if applicable) should be actively engaged in designing and implementing the sector strategy in five key areas:

1. Serving on the project's leadership team;
2. Helping implement program strategies and goals;
3. Identifying and mapping the necessary skills and competencies for the program(s);
4. Assisting with curriculum development and designing the program; and
5. Where appropriate, assisting with the design of an assessment or credential that will address industry skill needs.

Partnerships will occur on the state and local levels. Employers and industry representatives from high growth or emerging growth sectors will be key partners at both the state and local levels.

Local Level Partnerships: Local partnerships will focus on service delivery, program implementation, regional or local sector strategies, and local alignment that mirror state strategies. Local workforce boards will engage and support employers in efforts where they can create or build on apprenticeships, internships, and On-the-Job Training (OJT) experiences that support sector and career pathway strategies. **Participating local boards will build on current sector partnerships or create new partnerships that, at a minimum, include representatives from the local community college or vocational/technical education institution and a county department of human services, and include at least 3 employers from each sector or industry selected as a local area of focus. The Local Area must provide a list of the employer partners, either current or targeted, and describe how they will be engaged to support the development of their sector partnership project.**

State Level Partnerships: State partnerships will focus on statewide planning, policy development, streamlined assessment and common forms, data collection, asset mapping, state level blended programs, braided funding, and statewide sector and career pathway strategies. Statewide planning and implementation activities will include, at a minimum: development of policy guidance for provision of enhanced dislocated worker services; alignment and better integration of state agency program service delivery; resource leveraging; development of system navigation tools and processes to make it easier for program participants to access services from multiple agencies easily and with minimal duplication of effort (e.g. acceptance of assessments conducted by another agency); the evaluation, development and acquisition of hard and soft skill assessments and technology-enabled tools such as virtual job shadowing and virtual job fairs, coordination with new state level sector and career pathway activities, technical assistance and training, and program evaluation.

The planning component of the grant will take place simultaneously with program delivery activities.

F. Local Area Project Plan Requirements

Each participating local area must describe how the funds will be used for planning, program activities, and administrative costs. **Attachments #2 and #3** include documents to use in preparing the project plans.

G. Program Activities

SP NEG program services are differentiated into two categories: Enhanced Career Services and Training and Work-Based Training Models. **A cost-per-participant cap of $10,000 applies to each dislocated worker participant.**

1. Enhanced Career Services to Dislocated Workers

Enhanced career services provide the workforce system the opportunity to build on a customer-focused approach to service delivery. This opportunity is designed to provide dislocated workers with a range of customized services and job placement assistance they need to fill middle and high-skill jobs in identified high demand sectors, which may include career coaching and assistance in adapting their skills and experience to new industries. Other dislocated workers at lower skill levels may benefit from short-term and even longer-term training to obtain jobs that can match their previous earnings.

At least 20% of the total funding must be used to provide enhanced career services to dislocated workers.

SP NEGs will be administered consistent with WIOA laws and regulations, which allow greater flexibility in providing services to dislocated workers through enhanced career services including:

- Short-term prevocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct skills;
- Internships or work experiences that are linked to careers;
- Out-of-area job search assistance and relocation assistance, including the development and planning of policies for the provision of these services;
- English-language acquisition programs in coordination with other activities, as appropriate for individuals to obtain unsubsidized 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/or in-depth interviewing and evaluation to identify employment barriers and development of individual employment plans;
- Career planning, job coaching and job matching services;
- Identification of appropriate training programs;
- Job development and placement; and/or
- Provision of referrals to, and coordination with, other programs and services.

Career services may also include the availability of the Workplace Readiness Credential. The Workplace Readiness Credential assesses soft skills in eight key areas (Attitude, Communication, Planning and Organizing, Critical Thinking, Interpersonal/Social Skills, Teamwork, Professionalism, and Media Rules), and will result in the issuance of a credential if the individual scores above 70% in all areas. Targeted training will also be available for participants who do not meet this threshold in any area, followed by post-assessment testing prior to the issuance of the credential. Local areas are also encouraged to explore the use of Success Profiler, a tool that assesses emotional intelligence related to work functions, as an additional resource to address the need for soft skill assessment.

2. Training and Work-Based Training Models

Training and work-based training models will be a key component of the SP NEGs. Research has shown these models to be effective in helping job seekers to quickly reenter the workforce, learn the desired skills in the workplace, and obtain or retain employment utilizing the newly acquired skills and competencies.

At least 30% of the total funds must be used for one or more of the training and work-based training models identified in the application narrative.

Training and work-based training services will utilize existing strategies that will emphasize and link pre-vocational training and credentialing with work-based training such as work experiences, OJT, registered and other apprenticeships, incumbent worker training, transitional jobs training, and customized or cohort training, and will utilize existing sector and career pathways strategies that target high demand occupations.

Work experiences may be used concurrently or in conjunction with classroom vocational training through the Community College system or other educational institution. Internships may be paid or unpaid, and will be primarily short term in nature; the goal of a work experience is to equip students with actual hands-on experience in their new career field to help build their resumes.

Project plans must provide a rationale for the types of work-based learning to be undertaken during the SP NEGs in each local area. Allowable training and work-based strategies under the SP NEGs are consistent with the expanded strategies authorized by WIOA and include:

- On-the-Job Training, consistent with WIOA;
- Development and provision of transitional job opportunities and policies;
- Incumbent Worker Training (IWT) opportunities and policies that provide underemployed dislocated workers with opportunities for advancement and wage gains within their company or used to avert layoffs;
- Pre-apprenticeship training for dislocated workers with linkages to Registered Apprenticeships;
- Development of customized/cohort training to help employers who need to hire workers who have training or skills that are not readily available in the local labor market in sufficient numbers to meet the business's need; and
- Investments in competency-based training strategies that result in stackable and/or latticed credentials that are industry recognized.

<u>On-The-Job Training (OJT)</u>

OJT opportunities must be provided under a contract with an employer in the private non-profit or for-profit sector. Consistent with WIOA, the State or local area should identify the wage reimbursement cap for OJT. Generally it is 50%; however, the Governor or local board may increase it to 75% based on certain factors. If a local board is seeking an increase in the wage reimbursement cap, they should identify the factors it is using to make the determination. Factors may include:

- The characteristics of the participants (e.g. length of unemployment, current skill level, and barriers to employment);
- The size of the employer (e.g. small and medium-sized business often have more barriers to participation at lower reimbursement rates);
- The quality of employer-provided training and advancement opportunities; and

- Other factors the State or local boards may determine appropriate (e.g. the number of employees participating in the training, wage and benefit levels of the employees (both pre and post participation earnings)), and relation of the training to the competitiveness of the participant).

Local areas must obtain local board approval for raising the reimbursement limit from 50% to 75% and must modify their local OJT policies to include the process and circumstances for requesting an increase.

Credential attainment is not required to be a part of OJT, and OJT will continue to be exempt from the Department's credential performance measure. However, grant recipients are strongly encouraged to prioritize opportunities to include a formal training component that leads to a credential.

Incumbent Worker Training (IWT)

Although the purpose of the SP NEGs is to provide support for dislocated workers who are currently unemployed, a portion of available funding may be used for IWT strategies for underemployed workers. There are three types of incumbent workers who may be served by the SP NEG: 1) workers who were dislocated from a previous full-time job but have not been able to return to full-time employment; 2) workers who were forced to take a reduction in hours for economic reasons, e.g. to avoid a layoff with their current employer, or 3) workers who have experienced a reduction in their pay rate.

While these workers are employed, they have experienced a reduction in hours or a previous dislocation that has led them to accept reduced employment and often lower wages that may have a permanent effect on their careers. As a rule of thumb, the definition for being employed in a "stop-gap job" is that the applicant's current employment pays them less than 80% of their wage at dislocation, or they are working less than 80% of the hours they used to work, then the current job can be considered "stop-gap." If this is the case, then a combination of their work history and a self-attestation statement explaining why their current employment should count as them being under-employed would be sufficient as far as documentation is concerned.

IWT strategies, if proposed in the project plan, must be described in the plan narrative. These strategies must focus on increasing skills for underemployed, front line workers in an effort to advance these workers to more ski11ed positions with the same employer or in the same industry sector leading to an increase in earnings through more work hours or an increase in pay. Once these workers advance, the employer must provide an opportunity to the local service provider to backfill the vacant position with a local dislocated worker. As part of the IWT strategy, applicants must describe their upskill/backfill strategy in their application narrative.

No more than 10% of the total funds may be used for Incumbent Worker training.

IWT training must be provided under an agreement with an employer in the private-nonprofit or for-profit sector. IWT must have an in-kind or cash employer match based on the size of the company. Wages paid to the participant while in training can be included as part of the match. The matching requirements are 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, or
- At least 50 percent of the cost, for employers with more than 100 employees.

Transitional Jobs

Transitional jobs are a new type of work-based training that is allowed under WIOA. Transitional job opportunities must be provided under a contract with an employer in the private non-profit or for-profit sector, as well as non-federal public sector employers. Transitional jobs are time-limited, subsidized jobs that are for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history, and are combined with comprehensive career and supportive services.

The goal of transitional jobs is to establish a work history for the individual that demonstrates success in the workplace, and develops the skills that lead to entry into and retention in unsubsidized employment. Unlike OJT, there is no assumption that the individual will be retained in their transitional job after the experience is over, though that would be a successful experience and outcome. Successful transitional jobs strategies often include partnerships with other programs such as TANF. If transitional jobs are part of the project plan, they should be described in the plan narrative**.**

No more than 10% of the total funds may be used for Transitional Jobs.

If local areas choose to use transitional jobs as part of their service delivery strategy, they should adopt policies and identify employers (public, private or nonprofit) that can provide quality experiences for individuals to eventually obtain unsubsidized employment. Additionally, these policies should include plans on the amount reimbursements would be for the jobs, what supportive services should be included, and any limits on the duration of the transitional job.

Customers who are participating in paid work experiences or transitional jobs are typically placed on county or state payrolls. If a customer is working 30 or more hours a week (and it is NOT a seasonal position), the employer will have to pay health insurance on that individual. This federal requirement is effective in 2015 for employers with 100 or more full-time workers. Small businesses with 50-99 employees will need to start insuring full-time workers in 2016. Full-time is defined as working an average of 30 hours or more per week or 130 hours per month. The worker must also work at least 120 days during a 365-day period. The days do not have to be consecutive. As long as the transitional/subsidized employment or paid work experience is less than 120 days and/or less than 30 hours per week, health insurance does not have to be provided. If these time frames are exceeded and health insurance is required, grant funds can be used to pay for health insurance.

Customized Training

Customized training is training that is designed to meet the special requirement of an employer (including a group of employers), that is conducted with a commitment by the employer to employ an individual on the successful completion of the training, and for which the employer pays a significant portion of the cost of the training or contributes an in-kind match. The customized training contract identifies the cost of the training and the percentage of the employer contribution to training costs. WIOA allows local boards to determine the size of the employer contribution through a sliding scale based on employer size or other factors deemed appropriate by the local board.

A written statement is required from the employer as what new or additional training is needed, who provides the training, why it is needed, who needs it (specific current employees or new hires), and what can be expected by those that complete the training. The results of participation in a customized training program would be either

the advancement of a current employee, or the hiring of new employee. Customized training is typically provided by an outside vendor or entity.

Pre-Apprenticeships and Registered Apprenticeships

Section 122(a)(3) of WIOA provides a new opportunity for Registered Apprenticeship (RA) programs to be more directly connected to the public workforce system. As RA programs, they automatically qualify to be placed on the State's Eligible Training Provider List (ETPL), allowing Individual Training Accounts (ITAs) to support participants in RA programs, and more directly connect those programs to one-stop centers.

Some examples of typical RA program sponsors are:

- Employers who provide related instruction: A number of employers with RA programs provide formal in-house instruction as well as on-the-job training at the work site.
- Employers who use an outside educational provider: Under this model RA, program sponsors do not provide the related instruction or educational portion of the apprenticeship, but rely upon an outside educational entity to deliver instruction. Employers can use two- or four-year post-secondary institutions, technical training schools or on-line courses for related instruction. The employer is the eligible training provider and must identify their instructional provider.
- Joint Apprenticeship Training Programs: These programs are made up of employers and unions. They have an apprenticeship training school where the instructional portion of the apprenticeship program is delivered. The training schools are usually administered by the union, in which case the union would be the eligible training provider.
- Intermediaries: Intermediaries can serve as program sponsors when they take responsibility for the administration of the apprenticeship program. They also can provide expertise such as curriculum development, classroom instruction and supportive services, as appropriate. The intermediary is the eligible training provider and must identify the instructional provider if an outside organization is providing the educational portion of the apprenticeship. Intermediaries include: Educational institutions including two- and four-year post-secondary institutions or technical schools. In this model the educational institution administers the program, works with employers to hire apprentices and provides classroom or on-line instruction for the apprenticeship program;
- Industry associations that administer the program and work with employer/members and educational entities to implement the apprenticeship program; and
- Community-Based Organizations (CBOs) that administer the program and work with employers, educational entities and the community to implement the apprenticeship program.

Pre-apprenticeship training is an option for a person that lacks the minimum requirements to participate in a Registered Apprenticeship program. It may include classroom training or certain types of work-based training.

Other Allowable Training

For non-work-based training, project operators must limit the training opportunities provided to training providers listed on Colorado's ETPL, as proposed training programs must have demonstrated success in serving the targeted population. In addition, project operators should give preference to competency-based education and training that result in stackable, industry-recognized credentials.

H. Coordination of Services with Other Project Partners

Each participating local area shall:

1. Establish partnerships that, at a minimum, include representatives from each of the following: the local community college or vocational/technical education institution, a county department of county human services, and at least three employers or industry representatives. The employers or industry representatives must be from the sector identified by the local area as an industry of focus. The local area must also explain how each of the partners will be engaged throughout the project.

2. Work with their partners to develop a navigation model to enable participants to move between agencies and systems and leverage resources to obtain the services that they need to become employed.

3. Connect with other local programs that address the needs of young adults (18-24) transitioning out of foster care, and or local nonprofit agencies that serve the targeted population.

4. Recruit employers who can provide apprenticeships, internships, and OJT experiences and/or want to expand existing sector and career pathways strategies.

5. Involve employers in regional planning, program design, curriculum development, and developing work-based learning activities.

6. Have employers serve on the local area's SP NEG leadership team to help implement program strategies and goals; identify and map the necessary skills and competencies for the industry; and, where appropriate, assist with the design of an assessment or credential that will address industry skill needs.

7. Coordinate services with partner agencies for the benefit of leveraging resources, making program participant referrals, co-enrollment, and joint planning.

8. Identify curriculum which currently exists for career pathways in specific industries.

9. Describe how delivery of services shall be coordinated with at least two (2) other federal, state, or local partners or programs in the project plan.

Project plans must describe how they will deliver services in coordination with at least two other federal, state, or local resources, which may include, but are not limited to:

- Unemployment Insurance,
- Wagner-Peyser Employment Service,
- WIA/WIOA Adult and OW programs,
- Trade Adjustment Assistance,
- State Apprenticeship Agencies,
- Jobs for Veterans State Grants,
- Homeless Veterans' Reintegration Program,
- Career and Technical Education programs Authorized under the Carl D. Perkins Career and Technical Education Act,
- Employment and Training Activities carried out under the Community Service Block Grant Act,
- Adult Education and English for Speakers of Other Languages (ESOL),
- Vocational Rehabilitation Services,
- Temporary Assistance for Needy families (TANF),

- Supplemental Nutrition Assistance Program (SNAP) Employment and Training,
- Economic development, such as Manufacturing Extension Partnerships,
- Transportation infrastructure, such as Transportation Investment Generating Economic Recovery (TIGER) grants and Innovative Public Transportation Workforce Development Program Ladders of Opportunity Initiative,
- Child Care and Child Support programs operated at the state or local level,
- State Medicaid Programs, or
- Other federal agency supported job-driven workforce development initiatives, under the Departments of Transportation, Energy, Veterans Affairs, Housing and Urban Development, Interior, Health and Human Services, and Defense programs.

Coordination with these programs may include the leveraging of funds, participant referrals, co-enrollment or other demonstrated formal partnerships (including planning and the development of formal agreements for service delivery). In addition to public funding streams, applicants are also encouraged to leverage resources and activities with relevant philanthropic and community-based organization efforts in their target communities.

Supportive services may be made available to anyone participating in Title I career or training services. Local boards must develop written policies and procedures for coordination with partners to ensure the high quality, comprehensive service provision possible, prevent duplication of resources and services, and establish limits on the amount and duration of these services. Local boards are encouraged to develop policies that ensure that supportive services are WIOA-funded only when these services are necessary for the individual to participate in Title I activities and are not available elsewhere.

I. Program Enrollment and Activity

The program and sub-code used in Connecting Colorado to track performance is **DI-SP**. The program code DI is the code used for National Emergency Grants (NEGs) at the state level. Local areas are required to set-up the sub-code SP in order to track participants in this SP NEG program. Standard activity codes used for WIOA and Wagner-Peyser activities in Connecting Colorado will also apply to this grant. Co-enrolling customers into other programs, when appropriate, is encouraged to leverage resources.

J. Case File and Documentation Requirements

Project applicants will be required to follow standard WIOA Dislocated Worker program case file procedures and documentation requirements.

K. Reporting Requirements

The local area shall submit monthly and quarterly progress reports by the 14th of the following month to the State NEG Coordinator via email using the required reporting templates provided by the state. During quarterly review months, a narrative report (**Attachment #1**) will be required in addition to the usual monthly report (**Attachment #3**).

Monthly Reporting: Each month, local areas shall submit to the Project Coordinator via email a report (**Attachment #3**) on funding expenditures, participant enrollment and activities, and performance measures for the previous month.

Quarterly Reporting: In addition to reporting on funding expenditures, participant enrollment and activities, and performance measures, the local areas will track and document their strategic planning activities, their partner engagement, and additional career service and training outcomes for the purpose of analyzing sector strategy planning

and outcome effectiveness. Under WIOA, regional sector strategy projects are specifically encouraged, so these additional reporting elements will be useful as the state moves towards WIOA aligned programs and goals. The submission of success stories will be a required element of the quarterly report (**Attachment #1**).

Closeout Report: A project closeout report shall be submitted to the state within 30 days of the end of the period of performance. A narrative statement outlining the highlights, challenges, successes, and customer and partner feedback should be included in the report. The report should be sent via email to the State NEG Coordinator.

L. Performance Requirements

The local area shall meet the negotiated performance standards for the WIOA Dislocated Worker (DW) Program as well as the participant enrollment goal for the SP NEG grant. Only the first 4 measures listed below (with asterisk) will be formally monitored based on planned versus actual numbers. The other goals (those listed below the gray line) are strictly for the purpose of reviewing the progress of sector program and delivery strategies.

Despite having the same performance measures, participants enrolled in the SP NEG will not be included in the performance measures reporting for the WIOA DW program unless the participant is co-enrolled in the WIOA DW program.

Performance Measures and Goals	Actual	Standard or %
* Total Participants Served		100%
*Entered Employment Rate		68%
*6 Month Retention after Initial Placement		84%
*Average 6 Months Earnings		$17,000.00
Total # of Participants Completing Training		
Total # Participants Receiving a Credential		
Total # of Participants Completing Training & Entering Unsubsidized Employment		
Total # of Participants Completing Training & Entering Unsubsidized Employment in their Field of Training		
Average Wage at Placement		

M. Other Programmatic Requirements

Statewide Meetings, Training and Technical Assistance

The State or ETA requires all grant recipients and sub-recipients to participate in informational activities related to project development, sector partnership engagement, financial management, reporting, and other technical assistance throughout the life of the grant. The State NEG Coordinator intends to hold regular teleconference meetings with grant recipients, as needed, to provide coordination, training and technical assistance to local area staff.

Local areas, in coordination with CDLE, will work with their partners to develop a navigation model to enable participants to move between agencies and systems to leverage resources and obtain the needed services to become gainfully employed.

N. Outreach, Marketing and Promotional Guidelines, Limitations, Constraints

All outreach activity, marketing, and promotional expenses must be allowable pursuant to OMB Federal accounting principles and applicable circulars, and shall include specific language identified in the current Workforce Development Programs (WDP) agreement funding provisions. Refer to *PGL# 10-10-WP – Use of Funds for Outreach, Advertising, Public Relations and Informational Activities* for additional information and requirements.

O. Monitoring and Evaluation Responsibilities

Internal and Sub-Contractor Monitoring and Oversight

Local areas are responsible for internal monitoring and oversight of all aspects of the grant and grant activities, including the monitoring and oversight of work-based learning contracts, participants, and related activities to ensure consistency with the provisions of applicable Federal statutes, regulations, and the terms and conditions of this grant. Local areas must follow their local monitoring policies and procedures.

State Monitoring and Oversight

Monitoring of grant performance will be conducted by the WDP monitoring staff as part of their local area annual compliance monitoring and program reviews. In addition, CDLE will review the grant's progress at the state level on an ongoing basis to ensure that the overall grant activities, deliverables, expenditures, and performance outcomes are in compliance with federal and state requirements.

State and Local Area Evaluation

The SP NEG is part of the nation's move towards evidence based practice. As part of the monthly reporting process, the local areas shall include ongoing and progressive grant information on:

- Sector partnership collaborations and activities;
- Changes (planned or actual) to your service delivery methods in order to provide enhanced and individualized career services to customers;
- Changes (planned or actual) to make partner interactions, referrals, assessment sharing, and co-enrollments more efficient and effective;
- What local or regional industry positions are needed (and how they are identified), what career pathway training opportunities currently exist in your area to meet these industry needs, and if it includes credential attainment, and
- What participant recruitment and engagement services are being used, or are needed, to successfully serve these targeted and "hard-to-serve" dislocated worker populations.

P. Allowable Costs

Budget

The percentages outlined below represent the maximum or minimum levels for each category of services and the amount that CDLE has allocated towards each.

SP NEG Activity	Allowable Percentages of Total Grant Funds
Regional Planning	No more than $500,000 for all local grants combined
Local Area Administrative Costs	Of the 10% total funding used for administrative costs, 8.69% will be allocated to the Local Areas
Local Area Program Services	At least 50% of the total local allocation must be used for program services
Enhanced Career Services for Dislocated Workers	At least 20% of the total local allocation must be used for Enhanced Career Services (
Training and Work-based Training Models	At least 30% of the total local allocation must be used for training services • Not more than 10% of the total local allocation may be used for IWT • Not more than 10% of the total local allocation may be used for Transitional Jobs

Total funding allocations were negotiated between the state and local areas to reach an agreed upon budget and participant enrollment count for each local area. Sub-grants to the local areas were awarded on a cost-per-participant formula basis.

As part of CDLE's grant management process, the local areas will receive incremental funding based on performance. Only 50% of the approved local area budget will be allocated at the beginning of the grant's period of performance. During the 4th quarter of the grant, the state will review project performance with each local area. After this review has occurred, the local area may receive the second half of their funding allocation, or they may request to have their project plan modified or adjusted to ensure successful completion of the grant. Expenditure reporting for this internal project progress evaluation can include obligations and accruals. Expenditure and accrual (only) reporting must continue for federal reporting purposes.

Use of Planning Funds

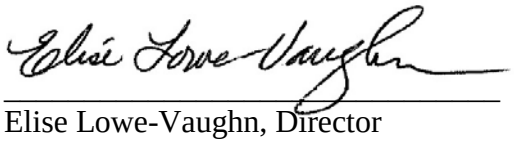
Allowable uses of funds include but are not limited to:

- Partnership and program development with stakeholders, employers, apprenticeship programs, etc. including convening among regional partners, employers, or other stakeholders;
- Acquisition, analysis and utilization of workforce information to identify regional trends, including but not limited to labor market information and other state or private data;
- Asset mapping and other analysis, such as Strength, Weaknesses, Opportunities, and Threats (SWOT) analysis;
- Developing regional plans;
- Training for staff in State and local areas necessary to facilitate regional planning and implement regional strategies;

- Establishing social and/or peer learning networks among regions using sector strategies; and
- Identifying and mapping the necessary skills and competencies for in-demand jobs, such as assessing how well those skills and competencies are reflected in existing training programs and curricula, and identifying aligned industry credentials for those skills and competencies needed.

V. IMPLEMENTATION DATE: Effective immediately.

VI. INQUIRIES:
Please direct all inquiries to the State NEG Coordinator, Courtney Popp, Workforce Development Programs, courtney.popp@state.co.us, (303) 318-9439.



Elise Lowe-Vaughn, Director
Workforce Programs, Policy and Strategic Initiatives

ATTACHMENT(S):
Attachment #1: Quarterly Reporting Template
Attachment #2: SP NEG Project Plan Requirements and Guidance
Attachment #3: Sector NEG Project Planning and Tracking Document