COLORADO
Department of Labor and Employment

Workforce Development Programs
633 17th Street, Suite 700
Denver, CO 80202

Category/Subject: Road to Work Initiative
Colorado Policy Guidance Letter#: GRT-2016-01, Change 1
Revise/Replace PGL#: GRT-2016-01
Date: October 17, 2016
Distribution: CDLE Management, State/Local Workforce Directors & Staff

OCTOBER 2016 REVISIONS HIGHLIGHTED

I. REFERENCE(S):

- CRS §24-103-503, Procurement Code.
- Policy Guidance Letter (PGL) #WIOA-2015-05, WIOA Title I Eligibility.
- PGL #WIOA-2016-01, PY15-19 Regional and Local Plan Guidelines.
- PGL #VET-2014-02, Priority of Service for Veterans and Eligible Spouses.
- PGL #ADM-2016-01, Administrative / Discretionary Grant Management and Accountability
- PGL #WIOA-2014-02, Guidelines for Affidavit of Immigration Status

II. PURPOSE:

To provide policy guidance to local workforce areas and Road to Work Supportive Services teams on the implementation of the Road to Work Initiative. The Road to Work Initiative provides intensive workforce development assistance and intervention to increase employment placement and retention at a livable wage for parolees under the supervision of the Colorado Department of Corrections, Division of Adult Parole (DOC).

III. BACKGROUND:

The DOC has contracted with the Colorado Department of Labor and Employment (CDLE) to create a pilot program to identify new promising practices in employment development for ex-offenders. The Road to Work Initiative utilizes the resources of local workforce centers, in partnership with community organizations and Corrections partners, to facilitate employment placement at a livable wage and retention opportunities for parolees who have been released from prison under the supervision of DOC. This initiative was developed to improve parolees' chances of successfully integrating into communities while reducing incarceration times and costs to the taxpayer by providing case management and supportive services to the targeted population with the intent of increasing job retention for parolees and successful reintegration into our communities.

CDLE will administer the Road to Work Initiative with an appropriation by DOC. The Road to Work Initiative creates an employment team comprised of the designated CDLE State Program Coordinator, the Local Area Workforce Case Manager, the Community Parole Officer, the employer, community re-entry and other identified partners, including mental health professionals, healthcare professionals, substance abuse treatment providers the Colorado Department of Vocational Rehabilitation, and other team members as appropriate to support the parolee in achieving and maintaining successful re-entry into society.

IV: POLICY/ACTION:

A. Local Area Participation

Participating local areas include Pikes Peak Workforce Center, Arapahoe Douglas WORKS! Workforce Center and DVOP staff statewide, with the potential to expand to other local areas going forward depending on the availability of funding and the success of the pilot phase.

B. Participant Eligibility and Recruitment

Only parolees that are referred by DOC may be eligible. Local areas may request specific customer referrals that will be provided based upon the Parole Officer's evaluation of an individual's suitability for the program. DOC will assess parolees for eligibility based on the following criteria:

- Medium risk, as scored by an objective risk analysis administered by DOC; or
- High risk as administered by an objective risk analysis administered by DOC and who are compliant with their supervision plan.

Parolees under supervision for a sex offense are excluded from this program. DOC will generate a list of eligible parolees and distribute to participating workforce centers and DVOP staff. Local areas and DVOP staff may exclude referred parolees from eligibility due to:

- Sex offender status;
- Non-participation;
- Threatening or intimidating behavior;
- Refusal to honor program requirements; and
- Veteran not meeting eligibility for the Jobs for Veterans State Grant (JVSG) (referred Veterans must meet the Significant Barrier to Employment (SBE) requirement before services can be delivered by DVOP staff).

C. Project Planning and Coordination

Participating local areas shall develop a detailed project plan which pilots innovative approaches to assist parolees to reintegrate themselves into our communities and reduce the financial burden of incarceration to taxpayers. The plan should focus on developing creative strategies to assist participants in overcoming barriers to employment due to their criminal histories as well as a focus on how funds will be spent as specified by the local Project Plans.

The Project Plan shall include the following components:

- Identification of one (1) FTE Local Area Workforce Case Manager dedicated to the program.
- A description of how the Workforce Case Manager shall assemble and work with a case management Supportive Services team for each parolee comprised of the DOC parole officer, the local area's business development representative, State Program Coordinator, and other program partners and staff as needed to support successful re-entry of the participant into the workforce. This support team, which may include a Case Manager, Parole Officer, Community Re-entry representative, Community Re-entry Employment Navigator, mental health professionals, substance abuse professionals, Vocational Rehabilitation staff and child support enforcement liaison/technician, will meet on at least a monthly basis to streamline any and all services for the parolee to maximize the chance for success.

- Identification of services to be provided to participants (see Section F).
- A description of how the local area Workforce Case Manager will work with DOC staff that will provide supportive services for participants. Such services may include, but are not limited to:
    - Housing: Indigent Housing vouchers if available in local area;
    - Transportation: Bus Passes where public transportation is available;
    - Mental health: Counseling sessions provided if needed as determined by DOC;
    - Substance abuse treatment: provided if needed; and
    - Other supportive services necessary as determined by the Case Manager and/or Supportive Services committee, which will be designated for each program participant.
- A description of which alternative and creative strategies will be utilized to create employment opportunities, improve job retention rates (and subsequently recidivism rates) and provide wrap-around support services.

D. Steering Committee

A state-level steering committee was created to provide strategic oversight of the program. The Road to Work steering committee will include the Adult Parole Deputy Director, Adult Parole Assistant Director – Parole Operations, CDLE Director of Workforce Programs, Policy and Strategic Initiatives, CDLE Workforce Programs Operations Director, Colorado Urban Workforce Alliance Director, Colorado Rural Workforce Consortium representative if participating, Business Services Manager, and Program Manager. The steering committee shall meet at least quarterly. The participating local area Directors or a designee shall participate on the steering committee to provide strategic oversight of the program.

E. Role of DVOP Staff

DVOP staff has a limited role in this program, but they may request supportive services for eligible Veterans through the program as funds permit.

F. Program Activities

Participating local areas shall offer participants enhanced "individualized career services" to include comprehensive and specialized assessments, development of an individual employment plan, group and individual counseling, career planning, short-term prevocational services, workforce preparation activities, financial literacy services, and English language acquisition and integrated education and training programs as appropriate to the needs of the participant. Services provided shall equip workers with the tools and skills they need to successfully re-enter the labor market with a livable and sustainable wage.

Services may include assessment, skills training, pre-apprenticeship training, interview training, resume writing, career counseling, skills achievement certification, on-the-job training opportunities (OJTs), internships, apprenticeships (registered and non-registered), short-term subsidized employment, and paid work experiences. Training services with an emphasis on work-based learning, career pathways, and completion of credentials are a priority. Job retention and follow-up services must be provided for one year after placement. The case management team and supportive services committee will oversee and facilitate services as needed on an individual basis.

Local areas can provide incentives tied to program activity as allowable by local policy.

G. Program Enrollment and Activity

DOC will generate lists of eligible parolees and distribute the referral lists to participating workforce centers. Participants should be enrolled into the program in Connecting Colorado using the **RA** program code. All services should be entered using existing service codes in Connecting Colorado.

H. Reporting Requirements

1. Monthly Reporting (**Attachment #1**)

   Local areas shall enter all individual services into Connecting Colorado, including comprehensive case notes to document all services, expenditures, employment placement and job retention activities. The use of the UN service code to track job placements is encouraged.

   Participating local areas shall submit monthly reports to the State Program Coordinator via email by 12:00 Noon Mountain Time on the 5th day of the following month. The report should include the following data (both monthly and cumulative) using the reporting template in **Attachment #1**:

   - # of Parolees Referred by DOC Adult Parole
   - # Enrolled in Program
   - # Entered into Individual Employment Plan
   - # Entered into Dual Enrollment with WIOA
   - # Completed Road to Work Comprehensive Assessments
   - # of Supportive Services, including:
     - Transportation Assistance
     - Housing Assistance
     - Clothing/Personal Care items Assistance
     - Work Tools
     - Other Assistance (supported by notes in Connecting Colorado)
     - Mental Health/Substance Abuse Referrals
     - Child Support Interventions
   - # of Training Enrollments
   - # of Successful Training Completions
   - # of Unsuccessful Training Completions
   - # of Ongoing Training Participants
   - # of Job Placements
   - Average wage at placement
   - # of Participating Employers
   - Employer Names/Contact Information
   - Work Training Experience (WE) Participants
   - # of On-the-Job Training (OJT) Participants
   - # of Retention Visits

2. Quarterly Reporting (**Attachment #2**)

   Cumulative statistics including all monthly reporting requirements, list of employed participants with employer name, wage increases, retention status and dropout statistics including number and reason for dropout. Quarterly reports will be submitted no later than 12:00 Noon Mountain Time on the 5th day of April (for the 1st quarter), July (2nd quarter), October (3rd quarter) and January (4th quarter of the calendar year).

3. Monthly Financial Reporting and Invoicing
   To allow for prompt reimbursement by CDLE to local areas, invoices should be submitted by the 14th of each month. Invoices should detail program, administrative, overhead, personnel and other costs associated with the program.

4. Closeout Report
   Cumulative statistics including all monthly and quarterly reporting requirements, itemized expenditure reports, and narrative summarizing promising practices, effective strategies, ineffective strategies and suggestions for modified practices going forward. The State Program Coordinator will provide the closeout report to DOC based on monthly and quarterly reporting data.

H. Required Record Keeping and File Maintenance

Each participant file and/or Connecting Colorado record shall include the following documentation:

- Signed copy of Affidavit of Immigration Status
- DOC Referral Form
- Copy of Participant's Legal ID
- Signed release of information allowing exchange of information between DOC, CDLE, local area and (where appropriate) Training Provider and / or Employer
- Comprehensive Assessment
- Individual Employment Plans
- Corresponding notes in Connecting Colorado for each case management meeting
- Documentation of all subsidized employment / vocational training funding / supportive services
- Justification for any expenditures on behalf of a participant

I. Expenditure Deadline and Recapture of Funds

By March 15, 2017, local areas must determine if the allocated budget is anticipated to be fully expended by June 30, 2017. If the funds will not be fully expended, the local areas shall provide the State Program Coordinator with the estimated amount of unexpended funds by email. This amount shall be recaptured by CDLE on March 31, 2017.
The local area director shall verify and confirm the amount of funding estimated to be unspent. After CDLE has received a consent letter from the local area director stating the local area's consent to reduce the allocated budget by the estimated amount, an NFA shall be sent to the local area showing that unspent amount as a budget reduction. The local area shall submit an Informal EA Modification form in response to the NFA.

J. Performance Requirements

Each local area will be responsible for reporting all services/outcomes listed above, plus descriptions of unique service delivery strategies utilized in each reporting period, along with a narrative describing effective, ineffective and proposed future strategies.

K. Monitoring Responsibilities: CDLE/DOC

CDLE and DOC will coordinate the monitoring of fiscal and operational activities of local areas and DVOP activities, including close out reports, performance statistics (from Section G.) and narratives describing which efforts were successful so that they may be studied in the context of the pilot initiative. See **Attachment 3** for the CDLE Monitoring Guide.

L. Allowable Costs

All supportive services costs that are permissible under local area policy are allowable. Any costs that are questionable should be discussed with the Road to Work State Program Coordinator before incurring the costs in order to avoid possible disallowed costs.

M. Exclusions

Disallowed costs include, but are not limited to:

- Child support payments;
- Legal fees;
- Any expenditure that is not supported by receipts, purchase orders, or other supporting documentation.

The State Program Coordinator is available to provide technical assistance as needed regarding possible disallowed costs.

V. IMPLEMENTATION DATE:

Effective immediately.

VI. INQUIRIES:

Please direct all inquiries to the Road to Work State Program Coordinator John Gore, 303-318-8836, John.Gore@state.co.us.

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

ATTACHMENT(S):
Attachment #1: Monthly Reporting Template
Attachment #2: Quarterly Reporting Template
Attachment #3: Road to Work Monitoring Guide