



Category/Subject: A Comprehensive Approach to Business Services
Colorado Policy Guidance Letter#: WP-2016-04, Change 2
Revise /Replace PGL#: WP-2016-04, Change 1
Date: January 17, 2019
Distribution: CDLE Management/Finance, State/Local Workforce Directors & Staff, Partners

January 2019 Changes Highlighted

I. REFERENCE(S):

- [Title I of the Workforce Innovation and Opportunity Act \(WIOA\) of 2014](#), Section 134.
- WIOA Department of Labor-Only Final Rule ([81 FR 56072](#), Aug. 19, 2016).
- Wagner-Peyser Act of 1933 as amended by [Title III of WIOA](#).
- Policy Guidance Letter (PGL) #VET-2014-02, [Priority of Services for Veterans and Eligible Spouses](#).
- PGL #WIOA-2016-02, [WIOA One-Stop Partner Requirements and Access to Services](#).
- PGL# ADM-2002-03, [Universal Access](#).
- PGL# ADM-2017-01, [Employment Service Complaint System](#).

II. PURPOSE:

To provide guidance to Local Workforce Development Boards and Local Areas on service delivery to businesses, specifically:

- To institutionalize the mission and structure of the Colorado Business Services Team;
- To identify the 11 core services for employers statewide and establish tracking and reporting procedures for those core services;
- To provide procedures regarding the verification of employers who request access to Connecting Colorado;
- To provide procedures regarding job orders;
- To delineate partner responsibilities; and
- To provide local policy requirements.

III. BACKGROUND:

In June 2011, business development services teams from local workforce areas across the state began a dialogue that evolved into the Statewide Business Services Alignment Initiative. This strategic effort sought to address gaps in serving businesses across all workforce programs. The vision of the initiative is “to provide seamless access to business development for all employers and produce positive economic return for business/industry and our communities.”

The Workforce Innovation and Opportunity Act of 2014 (WIOA) emphasizes business as a primary customer accessing services through one-stop centers. One-stop centers are responsible for identifying industry skill needs, identifying and implementing effective strategies to assist businesses, coordinating business services activities across one-stop partner programs, and delivering quality business services that assist businesses to recruit, retain, and develop talent. This policy recognizes the demand to align mandatory partnerships under WIOA, as well as the need to promote further alignment across local areas for the effective delivery of business services in Colorado.

The policy also outlines the key requirements that all business services staff will adhere to in order to deliver excellent customer service and achieve the vision of the Statewide Business Services Alignment Initiative. The first step in implementation of the Initiative is the creation of the Colorado Business Services Team.

IV: POLICY/ACTION:

A. Structure of Colorado Business Services Team

1. Mission and Objective

The mission of the Colorado Business Services Team is to provide seamless, rapid access to business services for all Colorado businesses resulting in positive economic returns for businesses, industries and our communities. The team is a “bottom-up” collaboration that relies on ideas and input from Business Services Staff across Colorado in developing processes and procedures to successfully serve employers.

2. Organizational Structure

The Colorado Business Services Team consists of an Executive Team and an advisory committee to support and advocate the work of local Business Development Representatives (BDRs) and WIOA required partners engaged in business services delivery.

The Executive Team is comprised of the Colorado Department of Labor and Employment (CDLE) Workforce Services Coordinator, the Director of the Colorado Urban Workforce Alliance (CUWA), a representative appointed by the Director of the Colorado Rural Workforce Consortium (CRWC), the Manager of Work Support and Employer Engagement in the Division of Vocational Rehabilitation, and other WIOA-required partner representatives as appropriate. This team will serve as liaison between the Business Services Advisory Committee, the Workforce Directors, CDLE Workforce Development Programs, and the Colorado Workforce Development Council. The Executive Team will convene on a regular basis.

A Business Services Advisory Committee (BAC) serves to create and coordinate the implementation of an annual work plan for the Colorado Business Services Team. The annual plan will include goals for Workgroups and must be submitted to the Workforce Directors and CDLE Workforce Development Programs for approval. Revisions to the annual plan will require approval of these two bodies. The BAC is comprised of the Executive Team, past and present Workgroup co-chairs, local business services staff volunteers approved by the Executive Team, and one Business Outreach Specialist from the Division of Vocational Rehabilitation. The BAC will convene on a regular basis. The number and purpose of Workgroups may change from year to year based on current and projected business needs.

B. Core Business Services

There are eleven core staff-assisted services offered to employers. **Attachment 1, Core Business Services Guide**, provides a detailed definition of the services, Connecting Colorado service code, and the required service metrics.

1. Use of Facilities
2. Assessments
3. Business Education
4. Business Information
5. Hiring Events
6. Job Fairs
7. Job Orders/Postings
8. Labor Market Information
9. Rapid Response
10. Screening
11. Training and Retraining

C. Approval of Employers in Connecting Colorado

Data security, integrity, and accuracy of information in Connecting Colorado are a priority for the entire Workforce System. Foremost is the protection of personal information of Colorado job seekers. **Attachment 2, Employer Verification in Connecting Colorado Guide**, contains specific procedures on approval of employer accounts in Connecting Colorado.

1. Definitions

- a. **US Jobs Employers:** Employers that enter Connecting Colorado through third-party sources such as US.Jobs. Also referred to as Job Central employers, National Labor Exchange (NLX) employers, or Direct employers.
 - b. **Web-Entered Employers:** Employers that enter Connecting Colorado through independent self-registration on Connecting Colorado.
 - c. **Staff-Entered Employers:** Employers that enter Connecting Colorado through workforce center staff data entry.
2. As of February 1, 2017, new web-entered and staff-entered employer accounts *must* contain a Federal Employer Identification Number (FEIN), or a Social Security Number (SSN) for employers that do not have an FEIN.
 3. All pending web-entered employers must be verified prior to activation, and approved or refused following the process in **Attachment 2, Employer Verification in Connecting Colorado Guide**.
 - a. **If the account is a duplicate**, notify the employer and consolidate the accounts.
 - b. **If unable to obtain or verify**, note the reason in the Employer notes section.
 4. Employers are required to state if they pay Worker Compensation and Unemployment Insurance. Payment into Workers Compensation and Unemployment Insurance is required to help validate the legitimacy of an employer or job posting. Employers who do not pay Workers Compensation and Unemployment Insurance cannot post unsubsidized jobs in Connecting Colorado.

5. **Provisional Employer Accounts (Inactive):** For employers who do not currently have job orders that can be posted in Connecting Colorado, but are currently receiving services from the Workforce System, staff will create an inactive employer account for the business. This account will not allow jobs to be posted, but will allow storing services. Staff may decide to activate the provisional account for job postings at a later date. Services provided to an employer without a FEIN in the account will not count in federal performance reporting.

D. Approval of Job Orders

See **Attachment 3, Job Orders Guide**, for a comprehensive resource on job orders.

E. Partner Responsibilities

1. Connecting Colorado Access

- a. All required one-stop partners that engage with businesses may be granted staff access to Connecting Colorado, to facilitate business partnerships and information-sharing. The list of one-stop partners is located in [PGL #WIOA-2016-02, WIOA One-Stop Partner Requirements and Access to Services](#).
- b. Local areas are responsible for granting access to the one-stop partners in their area and providing training as needed, including providing this PGL and requiring partners to follow it.

2. Memorandums of Understanding (MOUs)

- a. All local areas and partners should act in accordance with local MOUs required under WIOA.
- b. Connecting Colorado access may be addressed in local MOUs or in separate data sharing agreements. If access is addressed, it must include the level of access to Connecting Colorado, procedures for requesting access, procedures for notifying the local area when staff access should be terminated, and data confidentiality.

F. Business Services in WIOA

The Workforce Innovation and Opportunity Act of 2014 (WIOA) emphasizes business as a primary customer accessing services through one-stop centers. There are a number of career services in WIOA that may be delivered by business services staff (see **Attachment 4** for a complete list of allowable activities). Sector partnerships are one key strategy for engaging business at one table with other WIOA core partners, as well as other education and economic development partners.

G. Local Policy Requirements

1. Local areas may develop written policies and procedures for discontinuing or refusing services to employers, limiting services provided to employers, detecting and mitigating fraudulent employers, accepting or refusing job orders, and assuring quality control of job orders, including setting guidelines and internal monitoring for “Trusting” and “un-Trusting” an employer beyond the guidelines in this PGL.
2. Local policies must, at a minimum, reflect the requirements of this PGL, or be stricter than this PGL if local circumstances warrant additional requirements.
3. CDLE’s Regional Liaisons will request a copy of local policies and procedures as a part of the annual compliance monitoring of the local areas. In addition, local areas are encouraged to request technical assistance as needed from their Regional Liaisons and to request review of any new or revised draft policies.

V. IMPLEMENTATION DATE:

This PGL is effective upon release. The attachments to this PGL cover procedures and do not require local board approval to update.

VI. INQUIRIES:

Please direct all inquiries to Tom Morgan, Workforce Services Coordinator at Workforce Development Programs, Tom.Morgan@state.co.us or 303-318-8191.



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

ATTACHMENTS:

1. Core Business Services Guide
2. Employer Verification in Connecting Colorado Guide
3. Job Orders Guide
4. Allowable Career Services for Employers under WIOA Final Rule
5. Fraudulent Employer Intrusion in Connecting Colorado Procedure (NEW)