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GOVERNOR



GREG CANFIELD
SECRETARY OF COMMERCE

November 10, 2022

MEMORANDUM
GLWA PY 22-04

TO: Stephen Smith, Administrator
Alabama State Employment Service

FROM: Tracey Smith, Workforce Development Manager ^{TS}
Governor's Local Workforce Area

SUBJECT: Governor's Local Workforce Area (GLWA) Workforce Innovation and Opportunity Act (WIOA) Youth Policy and Revised Youth Work-Based Learning Guidelines

The purpose of this memo is to reiterate the Governor's Local Workforce Area (GLWA) Workforce Innovation and Opportunity Act's (WIOA) Youth policies that pertain to eligibility and enrollment and issue the revised Youth Work-Based Learning (WBL) Guidelines and Work-Based Learning Supervisor Guidelines. The revised guidelines are effective immediately on the date issued, November 10, 2022.

GLWA program staff have reviewed WIOA eligibility and documentation in AlabamaWorks! for enrollments in Work-Based Learning and Youth Provider Programs. In order to adhere to state and local policies, as well as the WIOA law, **Career Center staff must complete the WIOA eligibility and enrollment process prior to the individual receiving services** from Youth Providers, entering a training program, or being placed at a WBL worksite. This process includes:

- *Determining WIOA eligibility in AlabamaWorks! (AW!), uploading the applicant's eligibility documentation, Customer Information Form (CIF), signed WIOA application, Customer Agreement form, Grievance and Complaint Procedures, Customer Information Release Form and all other forms used for eligibility and enrollment. Case management notes must be entered explaining the applicant's barriers, the need for WIOA assistance, and the service strategy to achieve their goals. As of July 1, 2022, Case Managers must complete the Individual Service Strategy (ISS) and Objective Assessment in AlabamaWorks!; the paper ISS form is no longer an option for Career Centers. If all required steps in the eligibility process aren't completed, the applicant is not enrolled. As you have heard many times before, if it's not in AlabamaWorks!, it didn't happen.*

- *Many college students are still considered a dependent child for Youth eligibility. The WIOA Family is defined as two or more persons related by blood, marriage, or decree of court, living in a single residence, and includes a married couple and dependent children, a parent or guardian and dependent children, or a married couple. A dependent is under age 19 or under 24 and a “full-time” student (attends at least 5 months during the year and meets the school definition for full-time attendance) and is being claimed on a parent or guardian’s tax return, shared the same principal residence for more than half of the year and did not provide more than half of his/her own support during the year.*

Revised Work-Based Learning Guidelines and Forms

The revised Work-Based Learning Guidelines, new Evaluation and Training Plan, revised Worksite Agreement, WBL Requirements Brochure, Participant Requirements and Expectations Certification Form, and Worksite Supervisor Handbook are attached. *All WBL forms are available in AlabamaWorks! Staff Online Resources.*

Below is a list of Work-Based Learning Guideline revisions by heading and page number:

- **V. Worksite Training Hours** **Page 7**
 - Participant may work up to a maximum of 32 hours per week or 390 total hours. The Worksite is responsible for paying the participant’s wages if they allow the participant to work over the specified number of hours. Compensation must be paid when the overtime occurs. Overtime hours paid by the employer should not be listed on the participant’s Avionte timesheet.*
- **VI. Work-Based Learning Payroll Vendor and Wage Payments** **Page 8 - 10**
 - ✓ ***On-boarding and Placement Form:*** The Placement Form must include In-School or Out-of-School on the Invoicing/Funding Source line.
 - ✓ WDD sends a ***weekly Manhour Report from Sirius*** that list all active WBL participants, how many hours they worked the previous week, and how many hours total they have worked.
 - ✓ ***Case Managers must notify the Worksite Supervisor when participants have 40 hours left in their assignment.*** Send the Worksite Supervisor an official “WBL Notification of Participant Hours” email (with a copy to youth@commerce.alabama.gov) listing the participants with 40 hours remaining and reminding the Worksite is responsible for paying all wages over 390. If the worksite business fails to reimburse Sirius for overtime pay, the business including all locations/worksites will be barred from receiving any WIOA funding for at least two years.
 - ✓ ***If the Career Center Case Manager fails to comply with the GLWA policies, the Work-Based Learning program could be removed from the Career Center.***
 - ✓ ***Approving Timesheets:*** Worksite Supervisors, as Timesheet Approver #1, are responsible for reviewing the timesheet, and verifying total work hours do not

exceed 32 hours weekly. Worksite Supervisors that fail to verify participant hours and approve falsified timesheets could have their worksite removed as a WBL Worksite effective immediately. Career Center Case Managers, as Timesheet Approver #2, are responsible for reviewing the weekly timesheet for errors and the participant's total WBL hours.

- **V. The Worksite Agreement/Training and Evaluation Plan** **Page 14**
The Worksite job description will be developed and agreed upon between the Worksite Supervisor and the Career Center Case Manager for each participant. ***The job description will be on the Training and Evaluation Plan and will be uploaded before the participant begins work.***

- **VII. Required WBL Forms** **Page 16**
The Career Center Case Manager is required to upload WBL forms to the participant's documents in AlabamaWorks! before the participant can begin working. These forms include the following:
 1. Sirius Workforce Development Placement Form
 2. Worksite Agreement
 3. WBL Training and Evaluation Plan
 4. Participant Requirements and Expectations Receipt Form

Work-Based Learning Supervisor Guidelines

Career Center Work-Based Learning Case Managers should read the revised *Work-Based Learning Supervisor Guidelines*. *These guidelines must be sent to all WBL worksites as soon as possible.* All revisions should be discussed with the Worksite Supervisor, so they have a clear understanding of their responsibility. The revisions are the same as listed above for the WBL Guidelines. **Below is a list of Supervisor Guideline revisions by heading and page number:**

- Work-Based Learning Terms of Agreement: Page 4
- Approving Timesheets: Page 6
- Time and Attendance Policy: Page 8
- Worksite Employment and Termination Policy: Page 9
- Participant Skills Assessment: Page 13
- Attachments: Page 14
 - Worksite Agreement
 - Work-Based Learning Training and Evaluation Plan
 - Work-Based Learning Requirements & Expectations Brochure

Work-Based Learning Forms

The ***revised Worksite Agreement*** now includes a statement (in bold print and underlined) that participants cannot work more than 32 hours per week or 390 total. Worksites that allow participants to work over 40 hours per week or 390 total must reimburse Sirius Workforce LLC/Alabama Department of Commerce or be barred from receiving WIOA funding for at least two years. *Due to the number of participants working over the maximum number of weekly or total hours and worksites failing to pay WBL participants overtime or reimburse Sirius*

Workforce LLC, all current worksites must sign the revised Worksite Agreement to acknowledge compliance with the agreement or be barred from receiving WIOA funding for two years. The Worksite Agreement is a fillable Adobe PDF so it can be signed electronically or emailed for the Worksite Director/Manager's signature then after it is signed, the worksite can scan and email the Agreement back to the Case Manager.

The ***Work-Based Learning Training and Evaluation Plan*** has been revised to include both employability and workplace specific skills. The Worksite Supervisor will complete the Training and Evaluation Plan as the participant's job description then evaluate the youth at the midpoint and end of training.

GLWA staff will plan a webinar to discuss these revisions. Any questions concerning this memo, the revised Youth Work-Based Learning (WBL) Guidelines and Work-Based Learning Supervisor Guidelines should be emailed to: Youth@commerce.alabama.gov.