



EASTERN KENTUCKY



CONCENTRATED EMPLOYMENT PROGRAM, INC.

American Recovery  
and Reinvestment Act  
Youth Employment Program

# CLIENT POLICIES

LET'S *go* **2** WORK  
LETSGO2WORK.ORG

## Introduction

The American Recovery and Reinvestment Act (Recovery Act) was written to revitalize the nation's economy by sustaining existing jobs and generating new ones, particularly for segments of the population hit hardest by the current recession. Signed into law in February 2009, the Recovery Act recognizes the plight of young workers, as competition grows for even entry-level jobs, and provides a large infusion of economic stimulus funds specifically targeted to serve economically disadvantaged youth. It is the expressed intent of Congress that the bulk of these funds be used to create meaningful summer work experiences for youth. Hence, we face the prospect of putting record numbers of our region's young people to work this summer and we have the privilege of enhancing thousands of young lives.

This policy book was created to provide guidance solely for WIA Youth activities funded by the Recovery Act, including the summer Work Experience activities. The policies outlined define basic parameters for the program but are not intended to stifle the creativity, innovation, or resourcefulness of the contractor in planning summer activities. For the purposes of the Recovery Act-funded "Let'sGo2Work" program, requirements have been simplified and the definition of youth has been expanded to allow easier access to services. For any program elements not addressed in these policies, the laws and regulations for WIA Youth funds apply to Recovery Act funds.

In summer 2009 we will be serving youth 16 through 24 years of age. Extending the age range will bring groups into the youth system that heretofore were not frequently encountered, such as veterans (who receive priority) and a larger number of married individuals. Worksites should be developed with age-appropriate activities in mind, since what is meaningful for a 24 year old may not be fitting for a 16 year old. Likewise, more flexibility is given with regard to assessment, program design, and follow-up. Finally, the youth who are enrolled only in summer Work Experience have but one performance measure to meet: Work Readiness. (Youth who participate in more than summer Work Experience are subject to the full range of WIA Youth performance standards.)

It is important to note that the policies in this manual do not apply to WIA formula funded activities.

Let'sGo2Work Summer 2009 is an enormous undertaking. The timeframes imposed by Congress would seem impossible were it not for the strong partnerships with EKCEP's contractors and the wealth of experience that exists in the staff committed to serving eastern Kentucky's youth. Together we can prevail during this unique moment in workforce development history. Our system is being given the chance to prove its worth and we will be judged according to our outcomes. We simply cannot fail.

So, Let'sGo2Work!

## **Recovery Act Youth Client Policies Handbook Section One: Eligibility & Registration**

**All youth who receive services must be determined eligible and be registered into the Employ Kentucky Operating System (EKOS). The Commonwealth of Kentucky's Division of Workforce Services is in the process of making the necessary software and systemic modifications to allow Recovery Act clients to be entered into the EKOS system. It is critical that no Recovery Act clients be entered into EKOS prior to the completion of those computer programming changes. However, this does not prevent contractor staff from verifying eligibility, collecting documentation, and serving clients prior to data entry into the EKOS system should the State encounter delays in completing the revisions.**

Unless otherwise stated in this policy, the laws and regulations for WIA Youth eligibility apply to youth activities funded by Recovery Act.

### **A. Age Requirements and School Status**

**Youth must be ages 16 through 24 at the time of enrollment to be eligible.**

**Youth clients are categorized as either Out-of-School youth or In-School youth. These terms are defined as:**

- **In-School: An In-School youth is attending school (secondary or postsecondary) or is between school terms and intends to return.**
- **Out-of-School: An Out-of-School youth is an eligible individual who is either a school dropout, or has a high school diploma, or GED but is unemployed, or underemployed, and is not attending post-secondary education.**

### **In-School/Out-of-School Classification**

**A client's age and school status do not change after registration into WIA. For example, a high school dropout who re-enrolls in high school after WIA registration is considered a high school dropout during his/her entire WIA enrollment period.**

### **B. Income Requirements**

**All youth must meet the low-income requirements as defined in WIA section 101(13) to be eligible. The Lower Income Criteria Chart is adjusted by family size using the WIA-20 definition of Family, Dependent Child, and with the following additional definitions:**

### **One-in-a-Family**

- 1. An individual currently incarcerated for at least six (6) months or sentenced by the courts to confinement of six (6) months or more in a penal institution, correctional facility or jail; or**
- 2. An Individual in a court-ordered residential group home/treatment center; or**
- 3. A non-married and non-dependent youth 18-24 years old who is not a full- time student in a post-secondary, secondary or GED program, is not claimed as a dependent on any other person's income tax and contributes to their own support in the amount of at least twenty-five percent of the Lower Income Criteria Chart for a family size of one; or**
- 4. A non-married youth 18-24 years old who is a member of the Armed Forces or a resident of a Job Corps facility; or**
- 5. An individual under 18 who is an emancipated minor through the social service system and is not living with his or her parent(s) or guardian(s)**

**For the purpose of determining One-in-a-Family status in number three above:**

- Student is defined as an individual who is enrolled in school now, or an individual who is not enrolled in school now but is between semesters and going back to school, or an individual who has been enrolled in school any time since July 2008 and has not earned an Associate Degree or higher.**
  - Non-student is defined as an individual who is not now, nor have they been enrolled in either high school or college since July 2008; or an individual who has been enrolled in post-secondary school since July of 2008 but has completed an Associate Degree or higher.**
- (Note: These definitions are for eligibility as One-in-a-Family only and do not affect In-School/Out-of-School enrollment status. It is possible for a client to be classified as a student when determining One-in-a-Family status but be classified as an Out-of-School Youth for enrollment purposes.)**

### **C. Required Barriers**

**To be eligible, youth must also have one or more of the barriers to employment or entry into postsecondary education listed below:**

#### **Barriers to Employment and Entry into Postsecondary Education**

- Deficient in basic literacy skills**
- School dropout**
- Homeless**

- Runaway
- Foster child
- Pregnant or parenting
- Offender

● Needs additional assistance to complete an educational program or to secure and hold employment. A youth may be considered in need of additional assistance if it has been documented that he/she has one or more of the following characteristics:

- Is an individual with a disability
- Is enrolled in a postsecondary educational program and has been referred by the postsecondary institution for assistance because of being placed on academic or social probation
- Is enrolled in an alternative school program
- Is a secondary school student who is referred by a school counselor because of poor academic performance or other circumstances that cause the student to be at-risk of not graduating from high school
- Is a secondary school student who receives, or is a member of a family that receives welfare including food stamps
- Is a high school graduate of at least six months who is not enrolled in postsecondary education and is currently working less than 25 hours per week
- Neither parent of the client has obtained a postsecondary degree
- Has a barrier that is not listed here but has been identified and approved as a qualifying barrier by signature in a contract with EKCEP

### **Low Income Criteria Table**

**Non-Metro Area** (all counties except Carter County)

**Metro Area** (Carter County)

TABLE:

<b>Low-Income Criteria Table</b>		
	<b>Non-Metro</b> (all counties except Carter)	<b>Metro Area</b> (Carter County)
<b>Family Size</b>	<b>Income</b>	<b>Income</b>
1	\$10,400	\$10,400
2	\$14,000	\$14,000
3	\$17,600	\$18,243
4	\$21,518	\$22,523
5	\$25,394	\$26,583
6	\$29,698	\$31,089

7	\$34,002	\$35,595
For Each Additional Member, Add:	\$4,304	\$4,506
<i>Table Effective 7/1/08</i>		

## **Recovery Act Youth Client Policies Handbook Section Two: Program Design, Elements, and Parameters**

### **A. Initial Service Enrollment – Assessment**

**The first purpose of the services under this initial enrollment into WIA is to develop a partnership with the client based on trust, mutual respect, and information gleaned from a variety of activities that ultimately results in an individual service strategy.** Contractors have the flexibility to determine the appropriate type of Assessment and Individual Service Strategy (ISS) for youth served with Recovery Act funds during the summer months only. Although some level of Assessment and development of an ISS is required, a full objective Assessment and comprehensive ISS, as specified in the WIA regulations, is not required for youth served only during summer Work Experience.

#### **1. Objective Assessment**

**An Objective Assessment of the following items is an important starting point to match worksites with participants' interest and goals, whenever possible:**

- **Academic achievements.**
- **Occupational skills.**
- **Employability.**
- **Work history.**
- **Interests, aptitudes, and career compatibility.**

**Clients who participate only in summer Work Experience funded by Recovery Act will be evaluated only against the performance standard for Work Readiness attainment. None of the other Common Measures (literacy/numeracy gains, certificate attainment, placement in employment or post-secondary education) apply to these youth clients. Therefore, there is no need to administer the Test of Adult Basic Education (TABE) to determine whether a client is deficient in basic skills unless basic skills deficient is being used as the barrier in establishing eligibility.**

#### **2. Individual Service Strategy**

**It is expected for individuals enrolled in Let'sGo2Work Summer 2009 that the appropriate ISS will be enrollment in meaningful Work Experience with the objective of attaining Work Readiness. Additional assessment(s) or more detailed ISS development will be completed as deemed necessary only for those individuals considered appropriate for enrollment into further WIA formula-funded services.**

## **B. Subsequent Enrollments**

### **1. Work Experience**

**Because the emphasis of the Recovery Act funding is Work Experience, the majority of youth clients** should be enrolled in Work Experience as their **only** subsequent enrollment. Work Experience placements should be designed to teach participants to take responsibility for their learning, to understand and manage their career options, and to develop social skills and a maturity level that will help them interact positively with others on the job. This is especially true for at-risk students and high school dropouts, as summer employment may be one of the few opportunities they come across to learn how to enter the world of work. These efforts should rely on developmentally or age-appropriate strategies and the services provided and the work readiness goals set should be age appropriate.

**Clients who are enrolled only in Assessment and Work Experience will be measured only against the performance standard of Work Readiness. Enrolling a client in services other than Assessment and Work Experience will activate the entire slate of youth Common Measures for that client. In those cases, the client's performance in literacy/numeracy gains, certificate attainment, and placement in employment or post-secondary education will be measured. Contractor staff may decide to enroll a Recovery Act Work Experience client in additional services if the client shows a strong need and an ability to benefit, but staff should remember that the primary emphasis of the Recovery Act funds is to provide Work Experience.**

**Youth clients who are already enrolled in the regular formula-funded WIA In-School Youth Program may be enrolled in Recovery Act Work Experience. However, because they are already subject to the full slate of Common Measures they will remain subject to them, despite also being enrolled in the Recovery Act Work Experience.**

### **Recovery Act Work Experience for In-School Youth**

**Recovery Act Summer Work Experience opportunities for In-School Youth will be structured according to the following guidelines:**

- **Recovery Act summer Work Experience may be provided to secondary and postsecondary students as a strategy to give clients opportunities for career explorations, skill development, and important exposure to work experiences and employers that may be linked to the students' academic and occupational learning or interest, when possible.**
- **The duration of summer employment opportunities for In-School youth is limited to six weeks, unless otherwise approved by EKCEP.**
- **Recovery Act funds may be used to pay wages and related benefits for Work Experiences in the public, private, for-profit, or non-profit sectors.**
- **Planned community service projects designed to provide Work Experience and occupational learning are allowable.**
- **Youth working in Work Experience placements must be supervised at ratio of no less than one supervisor for every 10 youth workers. While limited funding is available for paid supervisors, it is expected that in most cases the employer hosting the worksite will provide the employee(s) necessary for individual and project supervision.**
- **Summer employment opportunities must be preceded by an intensive one-day work readiness seminar that uses a pre-set curriculum created to address specific work-related skills. This classroom instruction is designed to prepare youth for their Work Experience and should be completed before the Work Experience begins. Youth may be paid while participating in this preparatory instruction.**
- **The contractor is responsible for ensuring that the Let'sGo2Work Worksite Agreement Form is properly executed and all required forms and insurances related to paying wages (listed under "Work Experience" on the File Folder Content Checklist) are completed.**
- **Labor standards apply in any Work Experience where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.**

### **Recovery Act Work Experience for Out-of-School Youth**

Each Local Workforce Area must ensure that a minimum of 30 percent of funds are used for serving Out-of-School youth.

**Recovery Act Summer Work Experience opportunities for Out-of-School Youth will be structured according to the following guidelines:**

- **Recovery Act Work Experience can be provided to Out-of-School Youth as a strategy to teach positive workplace behaviors and explore careers.**
- **The duration of Work Experience employment opportunities for Out-of-School Youth will begin with an initial placement of up to six weeks. However, placements may be extended, based on individual client performance and funding availability, as approved by EKCEP.**
- **Recovery Act funds may be used to pay wages and related benefits for Work Experience placements in the public, private, for-profit, or non-profit sectors.**
- **Planned community service projects designed to provide Work Experience and occupational learning are allowable.**
- **Youth working in Work Experience placements must be supervised at ratio of no less than one supervisor for every 10 youth workers. While limited funding is available for paid supervisors, it is expected that in most cases the employer hosting the worksite will provide the employee(s) necessary for individual and project supervision.**
- **Summer employment opportunities must be preceded by an intensive one-day work readiness seminar that uses a pre-set curriculum created to address specific work-related skills. This classroom instruction is designed to prepare youth for their Work Experience and should be completed before the Work Experience begins. Youth may be paid while participating in this preparatory instruction.**
- **The contractor is responsible for ensuring that the Let'sGo2Work Worksite Agreement Form is properly executed and all required forms and insurances related to paying wages (listed under "Work Experience" on the File Folder Content Checklist) are completed.**
- **Labor standards apply in any Work Experience where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists.**

## **2. Recovery Act Work Experience Worksites**

Contractors should seek employers in both the private and public sector that are committed to helping participants receive the experience and training that is required to meet the work readiness goals set for summer Work

Experience participants.

● **Prohibited Worksites:**

Section 1604 of Division A of the Recovery Act states, "none of the funds appropriated or otherwise made available in this Act may be used by any state or local government, or any private entity, for any casino or other gambling establishment, aquarium, zoo, golf course, or swimming pool." Therefore all worksite selection for Let'sGo2Work Summer 2009 must be made with these prohibitions in mind.

● **Preferred Worksites:**

There is special emphasis on incorporating "green" Work Experiences into Let'sGo2Work 2009 whenever possible. Nationwide opportunities for skilled workers in the fields of solar, geothermal, wind power design, and the use of environmentally-friendly building materials will mean increased job opportunities for young people who have had exposure to work experiences that equip them with the appropriate "green" knowledge.

Contractors are also encouraged to connect to registered apprenticeship programs if available. Registered apprenticeship programs represent collaborative partnerships with schools, employers, labor organizations, community groups, and state apprenticeship offices. Pre-apprenticeship programs represent a hands-on training experience that provides an introduction to the skills and knowledge needed in a potential career field and prepares young adults to be eligible for formal apprenticeship programs.

● **Worksite Restrictions for 16 and 17 Year old clients:**

The following will apply to all minors 16 and 17 years old enrolled in Let'sGo2Work Summer 2009:

1. May work six hours a day on a school day; eight hours a day on a nonschool day up to 30 hours total in a school week.
2. May work between the hours of 6 a.m. and 10:30 p.m. preceding a school day and between the hours of 6 a.m. and 1 a.m. preceding a nonschool day during a school week.
3. See a list of prohibited duties considered hazardous by clicking on 803 KAR 1:100 in addition to the list provided below.

Prohibited jobs:

1. Manufacturing or storing explosives
2. Driving a motor vehicle and being an outside helper on a motor vehicle
3. Coal mining
4. Logging and sawmilling
5. Power-driven wood-working machines\*

6. Exposure to radioactive substances and to ionizing radiations
7. Power-driven hoisting equipment
8. Power-driven metal-forming, punching and shearing machines\*
9. Mining, other than coal mining
10. Slaughtering, meat packing or processing (including power-driven meat slicing machines)
11. Power-driven bakery machines
12. Power-driven paper-products machines\*
13. Manufacturing brick, tile and related products
14. Power-driven circular saws, band saws and guillotine shears\*
15. Wrecking, demolition and ship-breaking operations
16. Roofing operations\*
17. Excavation operations\*
18. In, about or in connection with any establishments where alcoholic liquors are distilled, rectified, compounded, brewed, manufactured, bottled, sold for consumption or dispensed unless permitted by the rules and regulations of the Alcoholic Beverage Control Board (except they may be employed in places where the sale of alcoholic beverages by the package is merely incidental to the main business actually conducted).
19. Pool or billiard room

Limited exemptions are provided for apprentices and student-learners under specified standards.

For additional information refer to:

- \*KRS 339.210 Definition of gainful occupation
- \*KRS 339.230 Restrictions of employment
- \*KRS 339.430 Machinery used in school courses
- \*803 KAR 1:100 Child labor
- \*USDOL child labor FLSA

### **3. Ten Required Program Elements**

**Contractors are not required to spend any Recovery Act funds to make the 10 required elements of WIA Youth Programs available to clients of the Recovery Act-funded Summer Work Experience Program, because the 10 required elements are already being provided by each contractor's regular formula-funded WIA Youth Program,**

### **4. Supportive Services**

**A one-time fixed rate supportive service payment of \$100.00 may be made available to each client at the conclusion of the one day work readiness seminar. This fixed rate supportive service payment is to enable each client to purchase work and/or training clothes, minor tools, client supplies, or other employment related expenses prior to the client receiving his or her first paycheck.**

**No additional supportive service funds beyond the \$100.00 fixed rate supportive service payment will be provided to summer Work Experience clients using Recovery Act funds. No regular WIA formula funds may be used to provide supportive services to Recovery Act clients during Let'sGo2Work Summer 2009.**

#### **5. Other Project Support Funds**

**Funding will be provided to each contractor to assist with client transportation and/or non-client related supplies based on the number of clients enrolled in the program at the rate \$150.00 per client.**

#### **6. Follow-Up Services:**

**Follow-up services are not required for clients who participate only in Recovery Act-funded Summer Work Experience.**

**If a client of the Recovery Act-funded Summer Work Experience Program is enrolled in additional services which cause the entire list of Common Measures to apply, follow-up services should be provided to that client as described in Section Two: B-9 of the EKCEP Youth Client Policies Handbook.**

#### **C. Incentives**

**There is no provision for Incentives in Let'sGo2Work Summer 2009.**

**Recovery Act Youth Client Policies Handbook**  
**Section Three**  
**Client Record Keeping**

**Contractors are responsible for maintaining all client records. These records will be monitored by EKCEP and by the Commonwealth of Kentucky's Division of Workforce Services.**

**A. Required Documents**

**Hard copy documents are required in files throughout the period of active enrollment and until completion of the state's monitoring for any file active during the time period being monitored. Electronic files of scanned documents are acceptable after the client's follow-up time frame has expired and monitoring has been completed.**

**B. File Folder Content Checklist**

**The File Folder Content Checklist on the following page should be used as a tool by WIA staff in maintaining the contents of each client's folder. It is recommended that forms and documents be placed in file folders in the same order as they appear on the File Folder Content Checklist. These checklists are used by monitors when reviewing file folders.**

## **Client File Folder Content Checklist Youth - Title 1B**

SSN: \_\_\_\_/\_\_\_\_/\_\_\_\_ Customer: \_\_\_\_\_

Each youth client folder shall be identified with the following information:  
Last Name, First Name, and Social Security Number

### **Required Folder Contents for all Youth Clients:**

- Pre-Application
- Grievance Procedure (WIA-14 and OET-513)
- JobSight Client Information Release Form
- Verification of Eligibility (WIA-20) and required documentation
- Orientation Checklist

### **Where applicable, the following will be in Youth Client Folders:**

#### **Work Experience**

- 108/Employer Agreement
- K-4
- W-4
- I-9
- Timesheets
- Worksite Agreement
- Job Description

#### **Supportive Services**

- Documentation related to specific types of supportive services that are required by policy and/or guidance memo from EKCEP