

SOAR

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TO A BRIGHTER FUTURE

— A PROGRAM BY OIC OF AMERICA —

**SOAR 6 Young Adult Program
(YARP 2)**



Policies & Procedure Manual

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Mission Statement

We equip individuals with academic and vocational skills and provide access to opportunities that help them accomplish personal achievement and embrace a spirit of responsibility.

Vision Statement

Ultimately, our goal is to help participants become responsible individuals who make good decisions while paving their own path to a brighter future.

Introduction

Federal Award Id. No. (FAIN): **YF-36571-21-60-A-42**

CFDA #: **17.270- Reintegration of Ex-Offenders**

The Period of Performance shall be from **July 01, 2021 thru December 31, 2024**.

OIC of America (OICA) competitively applied for and was awarded a Young Adult Reentry Partnership (YARP2) young adult grant in 2021 from the Employment and Training Administration, U.S. Department of Labor (DOL), authorized by the Workforce Innovation and Opportunity Act (WIOA). These grant funds have been awarded to implement the SOAR (Skills and Opportunities for Advancement and Responsibility) program through four OIC Affiliate agencies: OIC of Oklahoma County, OIC of South Florida, OIC of Wilson, and Portland OIC. OICA is the applicant agency and administrator of the project.

The purpose of the DOL's YARP 2 initiative is to partner organizations that provide reentry services with community colleges to provide education and training services to improve the employment outcomes for young adults involved in the criminal justice system. The purpose of the DOL's PH initiative is to provide eligible, incarcerated individuals in state correctional facilities or local jails with workforce services prior to release and to continue services after release by transitioning the participants into reentry programs in the communities to which they will return. The intent of these initiatives is to protect community safety through the successful reintegration of offenders returning to the community by ensuring that ex-offenders:

- become productive, responsible, and law-abiding citizens;
- are provided with positive opportunities to engage in pro-social activities such as employment or education;
- maintain long-term employment;
- sustain a stable residence; and
- successfully address their substance abuse issues and mental health needs.

YARP 2 program sites must partner with community colleges, the public workforce system, employers or employer associations, unions providing training, labor-management partnerships and the criminal justice system to provide eligible participants the following services:

- Career exploration activities, including information on barriers to employment and requirements for entering their occupation;
- Case management services, including the development of a comprehensive and personalized Learning Plan, which may be incorporated into the Individual Development Plan (IDP) that identifies strategies for achieving participants' employment goals, including overcoming barriers and acquiring supportive services;
- Assistance with linking participants to the social services required to help participants transition back to their communities, such as substance abuse and mental health treatment, healthcare, transportation, childcare, housing, legal aid, and other social services;
- Job preparatory experiences;
- Employment-focused services that lead to hiring;
- Assistance with applying for financial aid for post-secondary education, particularly for programs of study leading to degrees;
- Tuition assistance, where financial aid is not available (see note below);
- Job placement services;
- Legal services, such as record expungement, diversion, modifying child support arrears, or obtaining a state driver's license; and
- 12 months of follow-up services.

Policy 1: Performance Goals and Standards

SOAR 6 Young Adult Reentry Partnership 2 (YARP 2) Performance Goals

The purpose of this program is to provide education and training services that improve the employment outcomes of young adults who are involved in the criminal justice system and/or who left high school prior to graduation and to develop the capacity of community colleges to meet the needs of young adults with justice system involvement. Young adults served under this grant program are between the ages of 18 and 24 and currently or previously have been involved in the juvenile or adult criminal justice system and/or who left high school prior to graduation.

1.1 WIOA Performance Indicators

YARP 2 grants are authorized under WIOA, and therefore are required to report on five of the six WIOA performance indicators. The “Effectiveness of Serving Employers” indicator is NOT tracked or reported for REO grantees this year. The required REO-specific performance indicators are also identified below. While there are not goals established for three of the WIOA performance indicators, there are goals for credential attainment and measurable skills gain, as well as the REO performance goals. Additionally, grantees may have identified performance measures for other performance indicators which are also identified below.

1. **Employment and Education Rate – 2nd Quarter After Exit:** The percentage of participants who are in education or training activities or in unsubsidized employment during the second quarter after exit from the program. **OICA must meet a rate of 70%, based on the OICA proposal.**
2. **Employment and Education Rate – 4th Quarter After Exit:** The percentage of participants who are in education or training activities or in unsubsidized employment activities during the fourth quarter after exit from the program. **OICA must meet a rate is 60%, based on the OICA proposal.**
3. **Credential Attainment Rate:** The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who attain a recognized postsecondary credential, a secondary school diploma or its recognized equivalent or an industry-recognized credential during participation in or within one year after exit from the program. A participant who has attained a secondary school diploma or its equivalent is included in the credential attainment rate, only if the participant is also employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program.
4. **Median Earnings – 2nd Quarter After Exit:** The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program.
5. **Measurable Skill Gains:** The percentage of participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment. Depending on the type of education or training program, documented progress is defined as one of the following:
 - a) Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level;
 - b) Documented attainment of a secondary school diploma or its recognized equivalent;

- c) Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the State unit's academic standards;
- d) Satisfactory or better progress report, towards established milestones, such as completion of OJT or completion of one year of an apprenticeship program or similar milestones, from an employer or training provider who is providing training; or
- e) Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams.

1.2 REO-Specific Performance Indicators

In addition to the WIOA performance indicators, below are the REO performance indicators for YARP 2:

1. **Enrollment Rate:** This enrollment goal is for the total grant period of performance. Grantees must ensure that each participant enrolled is provided with 1) the full menu of services prior to the end of the 24-month period of operation, and 2) the 12 months of follow-up services after exit. **OICA indicated that they would serve 560 participants and must meet a rate of 100%.**
2. **Credential Attainment Rate:** The percentage of those participants enrolled in an education or training program (excluding those in on-the-job training (OJT) and customized training) who attain a recognized postsecondary credential, a secondary school diploma or its recognized equivalent or an industry-recognized credential during participation in or within one year after exit from the program. A participant who has attained a secondary school diploma or its equivalent is included in the credential attainment rate, only if the participant is also employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program. **OICA must meet a rate of 65%.**
3. **Measurable Skill Gains:** The percentage of participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains, defined as documented academic, technical, occupational, or other forms of progress, towards such a credential or employment. **OICA must meet a rate of 70%.**
4. **Recidivism Rate:** The percentage of participants convicted of a new criminal offense committed within 12 months of their release from the correctional facility. Grantees must track recidivism until the end of the grant period of performance. **The goal for this measure is a percentage rate lower than the recidivism rate for the state in which the grantee is operating. OICA must meet a rate of less than 20%, based on your proposal.**
5. **First Offense Rates:** Grantees must also track and report the percentage of participants who had no prior offense but who are convicted of an offense during the grant period of performance. **There is not a set goal for this measure.**
6. **Community College Capacity Building:** YARP 2 grantees are to increase the quality of training available to this population through partnerships with community colleges, while also expanding capacity of community colleges to serve this population.

1.3 Additional OICA Targeted Performance Indicators

In addition to the above indicators, OICA has identified other performance measures to be tracked that is unique to what is stated above:

1. OICA must meet a rate of 70% for the **Employment and Education Rate – 2nd Quarter After Exit** performance indicator listed above in the *WIOA Performance Indicators* section.
2. OICA must meet a rate of 60% for the **Employment and Education Rate – 4th Quarter After Exit** performance indicator listed above in the *WIOA Performance Indicators* section.
3. OICA must meet a rate of 70% of participants placed in one or more of the following: Apprenticeship, Unsubsidized Employment, High School or Post-Secondary Education.
4. OICA must meet a rate of 60% of enrolled participants will enter occupational skills training.

1.4 Community College Capacity Building

YARP 2 Affiliates are expected to utilize one the below strategies, per the grant agreement. Affiliate sites may be permitted to undertake alternative community college capacity building strategies following review and approval by OICA.

A. Align education and training with industry-recognized stacked and latticed credentials on an in-demand career pathway.

1. Convene OIC employer networks and Industry Advisory Boards (IABs) with community college partners to inform curriculum development that aligns with workforce needs.
2. The OIC network will offer its reentry service expertise to suggest curriculum additions and modifications to provide additional support for the target population.

B. Online and technology-based learning strategies that allow participants who may be on house arrest or have transportation limitations to participate.

1. Implement online and technology-based learning through a new learning management platform that broadens access to stackable short-term credentials and employment readiness activities.

Grantees must ensure that they expend no more than 25 percent of funds awarded under the FOA on the community college capacity-building requirements outlined above. Applicants should indicate the amount of funds they intend to allocate to community college capacity-building in their budgets and ensure that this amount does not exceed the 25 percent limitation.

For further guidance on what is allowable please refer to: the Statement of Work and [TEGL No.10-16, Change 1 - Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\)](#)

1.5 Performance Standard

Performance below 15% for any of goal will require the sub-grantee to create a written corrective action plan to be submitted to OIC of America with their monthly report. Performance below 30% will require a meeting with organization leaderships, including sub-grantee presidents to review the corrective action steps.

Failure to meet performance goals may result in corrective actions on the part of OIC of America including fund reallocation as stipulated in the sub-grantee service agreement (see Policy 12: Monitoring and Grant Oversight).

1.6 Withholding of Payment

Failure on the part of Sub-recipient to comply with service agreement requirements will result in **withholding of any payments otherwise due Sub-recipient from OICA by virtue of any OICA obligation to vendor until such time as the service agreement requirements are met.** OICA reserves the right to use any legal means necessary to recover from any damage resulting from Sub-recipient's failure to meet the terms and conditions of this agreement. Sub-recipient shall be liable for any costs necessary to ensure service agreement compliance, including attorney fees.

Policy 2: Program Eligibility & Recruitment

Purpose

Identify program eligibility requirements to drive recruitment strategies for the OIC SOAR program to facilitate eligibility, recruitment, enrollment, and services to appropriate individuals.

Expected Outcome

Understanding of the eligibility requirements will lead to effective program recruitment and the enrollment of eligible individuals for the OIC SOAR program in compliance with U.S. Department of Labor (DOL) priorities to improve employment outcomes of adults and young adults who are or have been involved in the juvenile or adult justice system.

Policy

All program participants must be screened for eligibility prior to enrollment into the program. SOAR sites have 30 days following the date of enrollment to secure required supporting documentation for the participant. All participant eligibility documentation and supporting documentation must be maintained in participant case files on the QuickBase database per **Policy 2.4 Virtual Case Management**.

2.1 SOAR 6 (YARP 2) Eligibility Criteria

The following eligibility requirements apply to the SOAR 5 Young Adult Program (YARP). Participants Eligible to Receive Workforce Services:

- is at least 18 years and not older than 24 years of age;
- is a high school dropout* or currently involved or has been involved with the juvenile or adult criminal justice system, which includes:
 - currently or previously incarcerated;
 - under the supervision of the criminal justice system, either in out-of-home placements, on probation, or on parole;
 - under an alternative sentence by the criminal justice system; or
 - under a diversion program as an alternative to prosecution
- is eligible to work in the United States

*Note: Not more than 10 percent of participants may be high school dropouts without being involved in the juvenile or adult criminal justice system. For the SOAR 5Y grant, grantees have the discretion to enroll individuals convicted of violent offenses or sexual offenses and those assessed as high-risk of either offense. Grantees that choose to serve these populations must conduct a rigorous risk assessment of each participant assessing criminogenic need and maintain rigorous case planning for high risk participants.

Table 1: Target Geographic Areas

Contiguous^a Community	Geographic Area	Jurisdictions (Areas for which crime rates are reported)	Zip Codes (Areas for which #s of justice-involved adults are reported)	OIC Affiliate Serving Community
Community 1 (119 Census Tracts)	South Central Oklahoma City, OK	Oklahoma City Patrol, Divisions: Hefner; Springlake, Santa Fe; Southwest, Bricktown	73097, 73102, 73103, 73104, 73105, 73106, 73107, 73108, 73109, 73110, 73111, 73114, 73115, 73116, 73117, 73118, 73119, 73121, 73127, 73128, 73129, 73130, 73131, 73135, 73139, 73141, 73145, 73149, 73159, 73169, 73179	OIC of Oklahoma County
Community 2 (19 Census Tracts)	Central Multnomah County, OR	Portland Police Precincts: East, North; Gresham Police Department	97030, 97203, 97211, 97216, 97217, 97218, 97220, 97230, 97233, 97236, 9726	Portland OIC
Community 3 (215 Census Tracts)	Greater Miami Area, FL	Police Departments in: Coral; Gables, Florida City, Hialeah; Homestead, Miami, Miami; Beach, North Miami, Miami Lakes; Miami Gardens, Miami Shores; North Miami Beach; Doral, Opa-Locka; Surfside, Biscayne, etc. ^b	33010, 33012, 33013, 33014, 33016, 33030, 33031, 33032, 33033, 33034, 33039, 33054, 33055, 33056, 33101, 33109, 33122, 33125, 33126, 33127, 33128, 33129, 33130, 33131, 33132, 33135, 33136, 33137, 33138, 33139, 33141, 33142, 33144, 33145, 33147, 33150, 33157, 33160, 33161, 33162, 33166, 33167, 33168, 33169, 33170, 33172, 33174, 33177, 33178, 33179, 33181, 33182, 33187, 33189, 33190, 33193, 33194, 33196	OIC of South Florida
Community 4 (76 Census Tracts)	Greater Wilson Area, NC	Greene County Sherriff Department; Goldsboro Police patrol zones East, South and West Police patrol zones, Kinston city police	27530, 27531, 27534, 27812, 27813, 27822, 27827, 27828, 27829, 27830, 27834, 27837, 27851, 27858, 27893, 27896, 28333, 28365, 28501, 28504, 28513, 28525, 28530, 28538, 28551, 28554, 28578, 28580, 28590	OIC of Wilson

2.2 Eligibility Screening Procedure

To screen for eligibility for the program,

1. The referring agency or OIC staff person is able to enter applicant information through the **Referral Portal** on the Quickbase case management system via the following link: <https://oic.quickbase.com/db/bpkm3ruve?a=nwr>. This virtual form will help determine if individuals meet the eligibility requirements of the program as listed above. Referral information can also be provided to case management staff to be entered into Quickbase directly.
2. Each referred individual will be contacted by a SOAR program staff to attend a scheduled orientation meeting, or schedule a 1:1 meeting (based on availability of staff) to learn about the program and determine interest in moving forward in the process. Each affiliate will determine how frequently to hold orientations, and 1:1 meetings.
3. To move forward in the process, individuals will meet with program staff, in-person or virtually as deemed necessary by safety protocol and/or public health directives, to complete **Applicant Tab** within the Quickbase system for their respective grant. This tab includes the SOAR Program Enrollment Application, LS/CMI, and BESI. For those who move on to enrollment, an Individual Case Plan (Case Plan) will be completed in the **Participant Tab** to guide individual goal achievement. The intake fields, LS/CMI and BESI shall be completed prior to enrollment.

TABE¹, and O*NET Interest Profiler (found at My Next Move, www.mynextmove.org) may also be administered during the intake process or in a subsequent session, but they should be completed prior to confirming enrollment.

Note: Due to the Coronavirus pandemic, OIC is providing participants with the option to begin their application process remotely. Applicants can go to <https://oic.quickbase.com/db/main?a=SignIn> and login with Username **Participant01**, and password **SOARlogin1**, then click on OIC of America app to get started. It is incumbent on the affiliate staff to ensure potential applicants complete an application for their specific site by utilizing the provided Site drop down menu.

To confirm eligibility for the SOAR program, individuals must present documentation of:

1. Identity and proof of age,
2. Authorization to work in the United States,
3. Record of incarceration or supervision by the justice system, and
4. Selective Service Registration
5. Eligibility for community college enrollment (SOAR 5Y)*

*Note: As eligibility criteria and pre-requisites for enrollment will differ between affiliate sites, community colleges, and regions, affiliates are required to compile the enrollment requirements from the partners. Eligibility guidelines must be submitted to OICA for review and approval. Approved eligibility criteria must be incorporated into affiliate policies and/or participant handbooks.

Sites are encouraged to contact their point of contact at OIC of America for guidance in cases of uncertainty about the appropriateness of eligibility documentation.

2.3 Supporting Documentation

It is the responsibility of each affiliate to ensure that all required supporting document is included with the case file of each participant. Participant supporting documentation will be reviewed for completion during monitoring activities and program audits. This documentation is required in addition to all release forms, case notes, and other documentation as required by the grant. The following guidance has been provided for SOAR 5's Supporting Documentation protocol:

- (A) Proof of Eligibility to Work in the United States**
- (B) Documentation of Incarceration**
- (C)**
- (D) Veterans' Priority Service**
- (E) Selective Service Registration**

(A) Proof of Eligibility to Work in the United States. In some cases, one item of identification may satisfy more than one of the above requirements. Documents produced by county/state/federal agencies (e.g. Probation, Parole, Correctional) that include: Name, DOB, Picture, Social Security Number, and Address may be used to confirm eligibility. Examples of documentation that satisfy multiple eligibility requirements include:

¹ The TABE educational assessments may be replaced by alternative assessment tools that have been approved by OIC of America.

- A current, state-issued ID card and/or driver’s license documents identity as well as proof of residency in the program’s target area.
- An official document from an applicant’s PO and/or a system print-out from a probation/parole database may serve as sufficient documentation for all eligibility criteria provided that it includes the participant’s picture, name, DOB, and indicates that the probation/parole occurs within the target area.

Supporting documentation from either **List A** or a combination of **List B** and **List C** must be presented prior to enrollment. The supporting documentation, discussed below, may also serve as proof of eligibility at the time of enrollment. Acceptable pieces of supporting documentation are discussed are shown below:::

\Acceptable Forms of Identification (OIC has adopted the federal verification requirements). One form is required from List A or two forms from List B.

LIST A

- U.S. Passport – Certificate of U.S. Citizenship (INS Form N-560 or N-561)
- Certificate of Naturalization (INS Form N-550 or N-570)
- Unexpired Foreign Passport with I-155 stamp or attached INS Form I-94 indicating valid employment authorization
- INS Form I-151 or I-551 (Alien registration receipt card with photo)
- Unexpired Temporary Resident Card (INS Form I-688)
- Unexpired Employment Authorization Card (INS Form I-688A)
- Unexpired Reentry Permit (INS Form I-327)
- Unexpired Refugee Travel Document (INS Form I-571)
- Unexpired Employment Authorization Document (INS Form I-688B, contains photo)

-OR-

LIST B Proof of Identity	LIST C Proof of Citizenship
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<p>Driver's license or ID issued by federal, state or local agencies containing photo, or vital statistics, such as address, name, date of birth, sex, height and eye color.</p> <p>U.S. Military card or draft record</p> <p>Military Dependent ID Card</p> <p>Native American Tribal Document</p> <p>U.S. Coast Guard Merchant Mariner Card</p> <p>Driver's License issued by Canadian government authority</p> <p>School ID with photo</p>	<p>U.S. Social Security Card (cannot state it is "Not Valid for Employment")</p> <p>Certification of Birth Abroad issued by the Dept. of State (Form FS-545 or DS-1350)</p> <p>Voters Registration Card</p> <p>Original or certified copy of Birth Certificate issued by state, county, municipal authority or outlying possession of United States bearing official seal</p> <p>U.S. Citizen ID Card (INS Form I-197)</p> <p>ID Card for use of Resident Citizen in the United States (INS Form I-179)</p> <p>Unexpired employment authorization document issued by INS not listed in list A.</p>
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You must provide **TWO DOCUMENTS (one from LIST B and one from LIST C):**

(B) To confirm that applicant has a history of incarceration

<p>Acceptable Documentation for Proof of Incarceration or Supervision</p>	<ul style="list-style-type: none"> • Public record search documenting court involvement • Docket sheet which shows pertinent term of incarceration or supervision • Correspondence from justice system official • Department of Corrections supervision documentation. May include signed supervision guidance Form or referral letter on DOC letterhead • Printed verification of record from Bureau of Prisons (will only apply to federal inmates) • Justice Involvement Self-Attestation Form • Other Forms that document justice involvement as approved by OIC of America
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Acceptable Documentation for Proof of Residence in the Target Area	<ul style="list-style-type: none"> • State ID Card • State Driver’s License • Court record containing the applicant’s address • Utility bills or postage containing the applicant’s name and address • Other Forms that document residence as approved by OIC of America
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(C) Low Income Verification

The following documentation may be used to verify that the participant qualifies as low income:

Column A Social Services Award Letters	Column B Low-Income Earnings Verification by Income
<ul style="list-style-type: none"> ▪ SNAP letter ▪ WIC letter ▪ SSI letter ▪ TANF letter ▪ Section 8 letter ▪ Medicaid letter ▪ LIHEAP letter 	Proof of Identity <p style="text-align: center;"><u>AND</u></p> <ul style="list-style-type: none"> ▪ A paystub from the last pay period ▪ An unemployment/disability letter ▪ A bank statement showing income for the last month ▪ A Federal Income Tax Return ▪ Severance Statement

*2020 POVERTY GUIDELINES FOR THE

48 CONTIGUOUS STATES AND THE DISTRICT OF COLUMBIA

Persons in family/household Poverty guideline

1	\$12,760
2	17,240
3	21,720
4	26,200
5	30,680
6	35,160
7	39,640
8	44,120

For families/households with more than 8 persons, add \$4,480 for each additional person.

Alternative forms of documentation not accounted for in the above table may be used with the approval of the OICA offices. Supporting documentation must be kept on file at the affiliate site.

For cases in which low income supporting documentation, such as a social services award letter, must be compared to poverty levels, extrapolate approximate annual earnings from provided documentation and cross-referenced with the poverty level of the applicant’s zip code of residence. Directions for using the American Community Survey data to identify poverty level of county target area can be found in the SOAR 3 FOA (<https://www.doleta.gov/grants/docs/FOA-ETA-18-02.pdf>) page 58, Section VIII, subsection F.

**2020 Family Size at the 70% Level ¹						
SOAR 5 Affiliates (by Metropolitan Statistical Area)	70% LLSIL by Family Size					
	1	2	3	4	5	6
Philadelphia OIC (Philadelphia-Wilmington-Atlantic City)	\$10,847*	\$17,772	\$24,396	\$30,114	\$35,542	\$41,560

Montgomery County OIC (Philadelphia-Wilmington-Atlantic City)	\$10,847*	\$17,772	\$24,396	\$30,114	\$35,542	\$41,560
Tri-County OIC (Northeast: Metro; Harrisburg- York- Lebanon)	\$11,472*	\$18,801	\$25,804	\$31,854	\$37,594	\$43,961
OIC of South Florida (South: Metro; Miami-Fort Lauderdale-Port St. Lucie)	\$9,809*	\$16,072	\$22,060	\$27,234	\$32,143	\$37,593
OIC of Rocky Mount (South: Metro; Rocky Mount-Wilson-Roanoke Rapids)	\$9,809*	\$16,072	\$22,060	\$27,234	\$32,143	\$37,593

*Note: The 70% LLSIL for a single individual household is lower than the HHS Poverty Guidelines.

(D) Understanding and adhering to Veteran’s Priority Service requirements for federal funding sources. 38

U.S.C. 4215 requires grantees to provide priority of service to veterans and spouses of certain veterans for the receipt of employment, training, and placement services in any job training program directly funded, in whole or in part, by DOL.

The regulations implementing this priority of service are at 20 CFR Part 1010. In circumstances where a grant recipient must choose between two qualified candidates for a service, one of whom is a veteran or eligible spouse, the veterans’ priority of service provisions require that the grant recipient give the veteran or eligible spouse priority of service by first providing him or her that service. To obtain priority of service, a veteran or spouse must meet the program’s eligibility requirements. Grantees must comply with DOL guidance on veterans’ priority².

To be eligible for veteran status, individuals must meet one of the following criteria:

1. A person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service includes full-time Federal service in the National Guard or a Reserve component. This Definition of “active service” does not include full-time duty performed strictly for training purposes (i.e. that which is often described as “weekend” or “annual” training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities (State mobilizations usually occur in response to events such as natural disasters)

OR

2. Is a person who is
 - a. The spouse of any veteran who died of a service-connected disability; or
 - b. The spouse of any member of the Armed Forces serving on active duty, who at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - i. Missing in action
 - ii. Captured in the line of duty by a hostile force

² ETA’s Training and Employment Guidance Letter (TEGL) No. 10-09 (issued November 10, 2009) provides guidance on implementing priority of service for veterans and eligible spouses in all qualified job training programs funded in whole or in part by DOL. TEGL No. 10-09 is available at https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2816. This guidance applies to programs funded under WIOA. For additional information on veteran’s priority of service and WIOA, please see TEGL 19-16. TEGL 19-16 is available at https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=3851.

- iii. Forcibly detained or interned in the line of duty by a foreign government or power; or
- c. The spouse of any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans affairs; or
- d. The spouse of a veteran who died while a disability so evaluated was in existence.

Note: A spouse whose eligibility is derived from a living veteran or service member (i.e. categories 2.b or 2.c above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

(E) Understanding and adhering to Selective Service requirements for federal grants. Male participants are required to register for the Selective Service before participating in services. SOAR 5A and SOAR 5Y affiliate sites must verify that applicants have registered for the selective services. *If an eligible individual refuses to register for Selective Service, they are not eligible for services.*

When completing the Enrollment Checklist/Program Eligibility, the Selective Service Verification website (www.sss.gov/RegVer/wfVerification.aspx) can be used to confirm their Selective Service number as well as the date of registration, by entering a last name, social security number, and date of birth. The following forms of verification are also acceptable as documentation of prior registration:

- Printout from the Selective Service Verification site: www.sss.gov/RegVer/wfVerification.aspx;
- Selective Service Registration Card;
- Selective Service Verification Form (Form 3A);
- Stamped Post Office Receipt of Registration;
- Selective Service Acknowledgement letter; and/or
- Form DD-214 "Report of Separation";

For cases in which adult applicants have both (1) failed to register for selective services and (2) missed the cut-off age for registration, sites must furnish one of the following forms of documentation, in order to establish that non-registration was *neither knowing nor willful*, before enrolling said participant:

- (i) **status letter** from Selective Services, OR
- (ii) A signed **Attestation of Reasonable Cause for Non-Registration** form

This documentation, as well as any additional supporting documentation, must be kept on file at the affiliate site. Please note that additional supporting documentation is not required but encouraged. Examples and

further guidance on such documentation can be found in the TEGL No. 11-11, Change 2 (https://wdr.doleta.gov/directives/attach/TEGL/TEGL_11-11_change2.pdf)³.

It is at the discretion of each affiliate site as to whether they submit this internal documentation to the Selective Services office in pursuit of a Status Verification Letter. While this is not necessary for the provision of SOAR 5 services, provided that the above documentation process is fulfilled, procurement of a Status Verification Letter may be incorporated into the participant's case plan to pre-empt future barriers to services and/or career goals.

It is the responsibility of SOAR 5 affiliate sites to procure any necessary supporting documentation, evaluate the evidence presented by the individual, AND determine whether the failure to register was *neither knowing nor willful*.

2.4 Recruitment

Program recruitment will result from extensive outreach and recruitment efforts, examples of which include, but are not limited to, targeted program brochures, media press releases, electronic mailings, public service announcements for radio and television, and community presentations. In addition, state correctional system (includes probation and parole), county and local jails, county and municipal court, police departments, and local workforce boards will be pursued to refer individuals to the program. All recruited/referred individuals must be screened to be sure they meet the eligibility requirements set forth by the Department of Labor in awarding this grant. Please also keep in mind the outcome targets as outlined in the introduction section above. The cumulative enrollment outcome requirement for SOAR 5Y (YARP) is 560. Individual agency targets are identified in the sub-recipient contracts. Not all recruitments translate to enrollments. Historically, the ratio is close to 3:1; meaning a program must recruit at least program enrollment goals.

³ For additional guidance, including how this requirement applies to male participants incarcerated at the time of their 18th birthdays, please see Training and Employment Guidance Letter (TEGL) 11-11. Change 2 clarifies the implementation of the Selective Service registration requirements of the Workforce Investment Act (WIA) of 1998 § 189(h) for grantees funded or authorized by Title I of WIA, located at https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=8779 . This guidance applies to grants funded or authorized by WIOA.

Policy 3: Case Management Process

Purpose

Case management is a coordinated and goal-oriented **process to handle cases from opening to closure, interactively**, between an SOAR program participant and his/her case manager and other program staff. The purpose of this policy is to guide staff on how to facilitate SOAR program case management services. OIC SOAR program case management functions include pre-and post-academic assessments, coordination and delivery of credential training and other workforce activities to include employment placement and career pathways planning and follow-up services.

Expected Outcome

Over the course of 24 months, the OIC SOAR program will enroll and serve 560 participants for SOAR 6 (YARP 2).

Participants:

- will have a comprehensive Case Plan that addresses criminogenic, service and support needs.
- will be connected to employment, education, and supportive services as needed and available.

Policy

OIC affiliate case managers are responsible for implementing the case management elements and ensuring that enrollees are active participants in their case management activities. SOAR program case management elements include:

1. Eligibility, Intake, and Enrollment,
2. Assessment,
3. Goal Setting and Case Planning,
4. Coaching and Coordination of Support Services,
5. Monitoring, and
6. Documentation and Follow-up

3.1 Eligibility, Intake and Enrollment

Each individual will be confirmed as eligible during the agency's intake process. Each applicant who enrolls as a participant in the SOAR program must complete each of the following as part of the intake process to be counted as an official enrollment.

1. Program Enrollment Application included in the Intake packet prior to service delivery. The enrollment packet may either be entered through the QuickBase case management system directly or completed physically and scanned into the database. This form must be completed in its entirety. In cases where participants refuse to answer a non-required field, staff is to note the participant's refusal in the response area. The original form must be placed in the participant case file. Once a decision has been made as to participant enrollment, the application form should be updated with the decision and date.
2. A case management assessment and planning tool that measures the risk and need factors of late adolescent and adult offenders must be completed for each participant. The suggested tool is the Level of Service Case Management Inventory (LS/CMI). The Ohio Risk Assessment System (ORAS) and the

Women's Risk/Need Pre-Release Assessment (WRNA) are allowable alternatives to the LS/CMI. Any and all alternative risk/needs assessments must be approved by OIC of America before implementation.

3. The Barriers to Employment Success Inventory (BESI) and O*NET Career Profiler.
4. TABE or CASAS to assess basic skills attainment.
5. Case Plan with at least one career pathway goal (at intake/prior to enrollment)

Case managers must interview participants to gather information needed to complete the program Enrollment Application. Participants can refuse to provide an answer to fields in the Enrollment Application but should be encouraged to answer all fields as thoroughly as possible.

When intake/enrollment is completed in a group setting, it may be necessary for participants to complete the Enrollment Application. The case manager will then need to meet with each participant individually to review their Enrollment Application for completion and accuracy and/or assist with completion as needed. This will be especially important when working with individuals who have literacy, comprehension or other issues. The same process should be applied to the completion of the all assessments and the Case Plan.

3.2 Assessments

This section describes the required and optional program assessments that will be used by case managers to help determine the program path and services of interested program participants. Specific assessments to be administered and the timing for administration of those assessments will vary by Affiliate training program requirements.

LS/CMI

The Level of Service/Case Management Inventory (LS/CMI) is an assessment that measures the risk and need factors of late adolescent and adult offenders. The LS/CMI is also a fully functioning case management tool. This single application provides all the essential tools needed to aid professionals in the treatment planning and management of offenders in justice, forensic, correctional, prevention and related agencies.

Developed to reflect the increasing knowledge base on offender risk assessment since the Level of Service Inventory–Revised (LSI-R™), LS/CMI has refined and combined the 54 LSI-R items into 43 items in Section 1. In addition, 10 comprehensive sections have been incorporated to further assist public safety professionals in their analysis of offender management. This assessment is done prior to enrollment.

An LS/CMI must be completed on each program applicant prior to being confirmed as appropriate for the SOAR program. The LS/CMI will screen for important risk and need factors that help determine if the applicant is ready for employment and training services. In some cases, it will benefit the applicant to work on priority needs such as therapy and drug treatment prior to entering the SOAR program.

Women's Risk/Need Assessment (WRNA)

The WRNA is the assessments used by the criminal justice system and parole/probation in Oregon as a women-specific measurement instrument for criminogenic risks and individual needs. The suite of WRNA instruments are validated, peer-reviewed risk/need instruments in the public domain specifically designed by and for system-impacted women. The WRNA not only measures women's specific criminogenic needs, but also their strengths,

to drive a comprehensive, holistic case-plan designed to work alongside women and their gender- and trauma-responsive treatment and supervision.

Barriers to Employment Success Inventory (BESI)

The BESI gives individuals a quick and easy way to identify the hurdles and obstacles that stand in the way of job success. Though it takes only 20 to 30 minutes to complete, this powerful inventory not only helps people conduct a more effective job search, it helps them be more successful on the job as well.

The test takes rate 50 simple statements covering five categories: Personal and Financial, Emotional and Physical, Career Decision-Making and Planning, Job-Seeking Knowledge, and Education and Training. After users have identified their barriers, BESI suggests ways to overcome them and help individuals develop an employment success plan that can be used in groups or individual career counseling meetings.

When performed in conjunction with a criminogenic risk needs assessment, e.g. the LS/CMI, the case manager will identify a participant's level of criminogenic and work readiness needs. This system will allow OIC to fully utilize the Integrated Reentry and Employment Strategies (IRES) model. This assessment is done prior to enrollment.

Additional Assessments (All participants must complete TABE or ACCUPLACER at enrollment)

Educational Assessments

TABE Test

The TABE test is a tool to assess participants' reading, mathematics, and language skills educational levels. The analysis from the test is used to help determine an appropriate educational track for participant and the scores are often used as a pre-requisite for entrance into certification/training programs. Participants 18 & older without a High School Diploma (HSD)/HSED (High School Equivalency Diploma)/General Education Degree (GED), shall be TABE tested. Participants 18 & older with an HSD/HSED/GED must be tested if the certification program or prospective employer requires a minimum education level in one or more topic/testing areas⁴.

The TABE, or an approved alternative educational assessment, will be administered by the YARP 2 affiliate to determine the educational needs and goals of the participant, including math, literacy levels and/or tutoring needs. Participants who have an associates or higher degree will only be TABE tested if the employer or certification program requests it. If a participant has been TABE tested within the last six months, case managers can obtain the results and are not required to re-administer the test. TABE testing must be completed before a final decision is made on program enrollment.

CASAS

The CASAS educational assessments measure basic skill and academic achievement in reading, listening, math, writing, and related areas. We support adult educators and workforce development professionals as they work to facilitate transitioning older youth and adults to postsecondary education, training, and the workforce. CASAS tests have been approved by The United States Department of Education and the United States Department of Labor.

⁴ See approved Letter of Commitment for educational levels associated with affiliate training programs.

Work Readiness and Career Interest; My Next Move and O*NET Career Interest Profiler (<https://www.mynextmove.org>)

My Next Move is a toolbox to assist participants in becoming aware of themselves and explore various industries and career and help determine how their unique patterns of interests, skills and values can be applied in their career and assists the participants in becoming aware of the relevance of how their current educational experiences serve as the foundation for future career aspirations and life path. It is also used to confirm local and national labor market demand for chosen careers. Results of the O*NET Career Interest Profiler (<https://www.mynextmove.org/explore/ip>) will be used to help acquire meaningful employment and make successful transitions into and throughout the world of work. Using the Job Developer referral form, the case managers will refer the participant to the Job Developer to administer the assessment and learn more about development of a career pathway. **The Profiler must be completed on 100% of enrollees.**

3.3 Case Load Limits

Case managers will maintain a case load of no more than 30 participants at any given time. A case manager's active case load is defined as the number of participants active in the program that are in training or receiving SOAR services. Participants in follow-up do not count against this maximum as they have been exited from the program. More information on exiting participants can be found in **2.9 Program Exit** below.

Should a site's case manager have a case load in excess of 30 active participants for whatever reason (e.g. the sudden loss of the program's Case Manager, the Program Manager of said site must immediately contact their point of contact at OIC of America. The site will not be permitted to enroll any additional participants until OIC of America has given approval.

3.4 Goal Setting and Case Planning

The SOAR program enrollment protocol includes the development of a goal-oriented Case Plan that **encompasses an Individualized career goal.** Case Plans allow for documented transparency in the process steps that Case managers develop and take to assist trainees through the program in addition to readily identifying the services trainees need and have received. Case Plans are a mandatory program component and must be inclusive of supports the trainee needs, the intention or desired outcome of those supports, who is responsible for the supports and how those supports will be infused for development and followed up.

The case manager must ask the participant what he/she would like to accomplish and what career pathway he/she would like to explore. Together, the case manager and the participant will work to identify actions that will be beneficial in successfully completing those goals. Note: It is important to be mindful of results of the results of the intake process, including assessment results when developing the Case Plan. The case manager shall use motivational interviewing strategies and techniques to move in the direction which leads to the best vision for the participant. The SOAR Program Case Plan will be dynamic, flexible and adaptable to fit the needs of the participant. The SOAR Program Case Plan will guide the continuity of services.

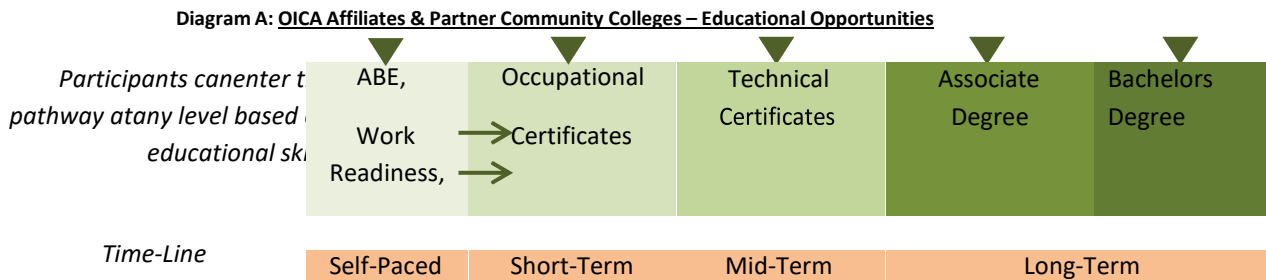
If the participant has an existing Case Plan from the referring agency or another agency, the SOAR Program Case Plan will incorporate the goals/tasks of that to minimize duplication of efforts/resources. These goals will include

personal needs, career goals and support services to ensure program success. Goals will relate to needs that are both criminogenic and career related, such as those that can affect education/workplace success and goals related directly to staying crime free. The case manager is responsible for coordinating services, based upon the participant’s goals/actions, with the SOAR program and other partners.

The SOAR Program Case Plan must focus on the strengths and assets of the participant while integrating her/his needs along with the requirements of the service systems with which the participant is involved. The Case Plan will be reviewed during each case management session and the case manager will document the participant’s status for each goal area both in the participant’s paper and electronic files. **A Case Plan must be created for 100% of enrollees.** Case Plans are to be started prior to enrollment and contained detailed career pathway and service plan within 30 days.

3.5 Community College Case Planning

Grants under this FOA must provide occupational training facilitated by a community college, in locally in-demand industries, and a college-bound track for those whose assessment, skills, and labor market experience indicate that this type of training/degree is most useful.



3.6 Virtual Case File Management

All SOAR affiliate sites are expected to maintain updated case notes, participant information, and case file documentation for all participants in the QuickBase database system. Affiliates are responsible for ensuring that all participant data is up to date in QuickBase at the end of every month.

Maintaining complete case files through QuickBase is mandatory for all enrollments. Sites must maintain physical case files as a back-up to the virtual case management system. Back-up physical copies of case files may be generated directly from the QuickBase system. Physical case files cannot be used as a replacement for uploading case files into the QuickBase case management system.

QuickBase User Change Request. The ability to request changes to users and/or user credentials on QuickBase are only available to Program Managers who must initiate the request. Program Managers will see a button “User Change Request.” Once this option is selected, Program Managers must select the “New Change Request” option and provide the requested information about the user (Direct link is

<https://oic.quickbase.com/db/bqmre26i8?a=td>). It is the responsibility of Program Managers to inform OICA directly and complete this form immediately when a staff member leaves, so that we can remove their access to the database in a timely manner. This is essential to protect the personal information of participants and safeguard database integrity.

A. Guideline for Participant Approval

It is the responsibility of the on-site Program Manager to review program applicants prior to enrollment. Following (a) the completion of all required assessments as well as (b) the entry of all applicant information into the QuickBase system, an applicant can be processed as a program participant. All elements of the Enrollment Checklist are still required BEFORE an applicant can become a SOAR program participant. Enrollment application completion can be verified through the Enrollment Checklist Report on QuickBase. Any required physical documentation (e.g. driver's licenses, social security cards, court dockets, etc.) must be uploaded to the Documents tab of QuickBase prior to enrollment.

It is the responsibility of all sites to abide by OICA for enrolling a participant in the SOAR program (see **2.4 Consulting the IRES Model for Case Services** below). OIC of America reserves the right to review any SOAR applicant information for quality control purposes. It is the responsibility of the sites to contact their OICA point of contact with any questions pertaining to enrollment eligibility. Affiliate sites must immediately notify OIC of America of any applicant removed due to duplication and/or entry errors. No participant in the QuickBase system may be deleted without direct approval from OIC of America.

B. Case File Management

It is the responsibility of all OIC front-line staff to maintain complete case notes on all participants to whom services are provided. Virtual case files are expected to contain all SOAR participant case management information including (1) the date of last contact, (2) relevant participant goals that aligns with an approved credentialed career track, (3) complete participant ICPs, (4) all participant background information as required for participant enrollment, (5) all case notes for each participant, as well as (6) all required eligibility documentation and supporting documentation to be uploaded to the QuickBase system.

It is the responsibility of SOAR staff to include all pertinent and available participant information across all available Applicant and Participant tabs in the database. QuickBase data, including skills gains and credentialing outcomes, must accurately reflect all metrics included in reports submitted to OIC of America and/or DOL (see policy **4 Affiliate Monthly Reports**). Affiliate sites are expected to validate reported outcomes by uploading verification in QuickBase whenever documentation is available (e.g. eligibility documentation and supporting documentation, paystubs, scans of participants certificates, etc.).

C. Oversight Protocols

On-site affiliate managers are responsible for maintaining the quality of case files in the case management system. OIC of America reserves the right to review affiliate case files for completion and quality control at any time. Failure to meet the minimum standard of Case File Management, as described in this policy, will result in a compliance alert or corrective action as outlined in Policy 11.

Affiliate sites are expected to have their virtual case files prepared and available for review during status calls with OIC of America. Virtual case files shall be reviewed in advance as well as during annual site reviews by OIC

of America Quality Assurance staff. Virtual case files are expected to be completed and available in advance of all site visit.

D. Technical Support

All requests for staff changes, user permission changes, and general QuickBase support should be submitted to your OICA QuickBase point of contact.

Any staff changes must be immediately reported to your OICA Program Manager as well as the OICA QuickBase point of contact, in order to modify site permissions for both new and departing staff.

OIC of America will send a notice in advance of any significant site maintenance or database updates that may disrupt normal use of the platform. Non-disruptive patches and updates will be made on an as-needed basis. Any data loss or security breaches must be reported to OIC of America immediately.

All questions pertaining to data standards should be directed to the OICA data team.

3.7 Consulting the IRES model for Case Services

Purpose

The OIC SOAR program will utilize the IRES model, an integrated employment and reentry strategy that indicates services are matched to participants based on their criminogenic need and job readiness level.

Expected Outcome

In general, returning citizens with high criminogenic risk/low job readiness will receive more intensive and structured services that complement close community supervision, whereas those with lower criminogenic risk/higher job readiness will receive minimal supervision and may need much less assistance, for example, restoring a driver's license.

Policy

The SOAR program case managers will work with participants to determine which services will be provided, through the program and partners depending upon the results of their criminogenic risk and need and job readiness assessments. Case managers will utilize the IRES model when determining services. Each affiliate shall have in place a resource directory that identifies agency or local community resources to address each of the eight criminogenic need areas. OICA will provide technical assistance in developing and maintaining the directory.

Procedure

After the OIC SOAR program assessment team member assesses participants along the three dimensions of criminogenic risk and job readiness and determines a high, moderate or low rating for each dimension, the case manager will determine the appropriate mix of services.

Lower risk offenders will be prioritized for more immediate entry into workforce components while higher risk offenders will receive more intensive and structured services for criminogenic needs before receiving workforce components. All services will be delivered with more or less intensity to reflect variation in participant risk levels.

The case manager will integrate workforce development practices with Corrections Evidence-Based Principles to connect participants with interventions that best address their criminogenic needs and work/career goals.



The case manager shall use the Case Plan at every session, adjusting it as the situation dictates, and shall:

- reward/affirm progress on the plan,
- sanction/express disapproval for anti-social acts,
- modify the plan as the need arises to indicate which services are being provided or completed, and
- stay focused on the plan by addressing the criminogenic needs.

The case manager shall consult the IRES model policy and the sample 4 quadrant IRES diagram on the next page when creating a participant’s Case Plan.

Sample Service Pathways based on Criminogenic Risk and Job Readiness*	
<p>All Participants Receive:</p> <p>(1) Risk and Need, Work Readiness and Barriers Assessments and other career assessment tools as needed.</p> <p>(2) Case Plan</p> <p>(3) Education or Training Services</p>	
Lower Criminogenic Risk Higher Job Readiness I	Lower Criminogenic Risk Lower Job Readiness II
<ul style="list-style-type: none"> • If incarcerated, Work Release • One-Stop services leading to direct job placement in high-demand occupations <p style="text-align: center;">OR</p>	<ul style="list-style-type: none"> • Work Release • Educational, remediation and/or job skills training • Career Readiness • Basic Skills (GED, ESL)

<ul style="list-style-type: none"> • Certificate/degree programs while working part-time • Case Management (lower intensity) <p>4-6 months of programming with OIC or referral partner</p>	<ul style="list-style-type: none"> • Occupational Skills Training in high demand sectors (including non-traditional by gender) <p><u>Followed by:</u></p> <ul style="list-style-type: none"> • Entry-level job or part-time entry level-job plus certificate programs <u>OR..</u> • Sector-based on the job training (OJT) and • Case Management (lower intensity) <p>6-9 months of programming with OIC or referral partner</p>
<p style="text-align: center;">Moderate/Higher Criminogenic Risk Higher Job Readiness III</p>	<p style="text-align: center;">Moderate/Higher Criminogenic Risk Lower Job Readiness IV</p>
<p><u>Services to address/stabilize criminogenic needs:</u></p> <ul style="list-style-type: none"> • One-to-one coaching • Case management (higher intensity, case management by CMs trained in Motivational Interviewing and cognitive concepts) • Cognitive programming • Substance abuse/mental health treatment • Trauma-informed curriculum • Family reunification/child support services <p style="text-align: center;"><u>Followed by:</u></p> <ul style="list-style-type: none"> • Sector-based training <p>12 months of programming with OIC or referral partners</p>	<p><u>Services to address/stabilize criminogenic needs:</u></p> <ul style="list-style-type: none"> • One-to-one coaching • Case management (higher intensity, case management by CMs trained in Motivational Interviewing and cognitive concepts) • Cognitive programming • Substance abuse/mental health treatment • Trauma-informed curriculum • Family reunification/child support services <p style="text-align: center;"><u>Followed by:</u></p> <ul style="list-style-type: none"> • Seasonal or transitional job • GED or remedial education <p style="text-align: center;"><u>Followed by:</u></p> <ul style="list-style-type: none"> • Sector-based training <p>* Probably is not be a good candidate for SOAR if requires more than 12 months to be job ready.</p>
<p><i>*CSGJC (2013). Integrated Reentry and Employment Strategies: Reducing Recidivism and Promoting Job Readiness</i></p>	

3.8 Documentation of Services

In order to pay for services with DOL funding proper documentation must exist to confirm that the services listed in the case plan were provided. The case file should include documentation regarding participant services. Examples of adequate source documentation include, but are not limited to:

- service start and completion dates from program registration forms,
- class schedule,
- service provider name, address and contact person,
- attendance records signed by staff,
- completion certificates, and
- grade reports.

3.9 Supportive Services

Supportive services are costs paid to the participant or a service provider for services or goods that allow the participant to take part in training, employment, or educational opportunities consistent with their case plans. Supportive services are important case management tools and include items such as participant transportation costs, application fees, and work attire. Emergency Assistance and Needs-Related Payments are subsets of supportive services.

It is important to ensure access to support services is consistent for all eligible participants. This includes any set per person maximum/limits set that will be further defined by policy and procedure per affiliate. The Support Service Request Form must be completed to request support services for participants and must be approved by the Project Director prior to providing to the participant. The Form requests participant name, amount of requested support and purpose of support service.

Affiliate sites must track all supportive service, incentive, and stipend payments issued to program participants. This includes maintaining and submitting program Expenditure Ledgers (provided in the SOAR Forms portfolio) when requested as a spot check item.

3.10 Emergency Assistance and Needs-Related Payments.

Affiliates may utilize Reentry Project grant funds to provide emergency assistance to participants in the areas of housing, substance abuse treatment, and mental health treatment as well as needs- related payments.

Emergency Assistance: Eligible instances of participant emergencies are defined as situations in which there exists a pressing and verifiable need that requires immediate action. Prior to expending grant funds, affiliates must first leverage any existing service provider partnerships. Eligible instances of participant need that cannot be addressed through long-term case planning nor through referral to local service providers may utilize grant funds for this purpose.

As pertains to the SOAR 6Y (YARP 2) grant, programs may expend no more than 5 percent of grant funds may be used to provide emergency assistance for housing, substance abuse treatment, and mental health treatment for participants. However, grantees must submit a written policy on the use of these funds as a condition of award. Up to 1.5 percent may be used for needs-related payments.

Needs-Related Payments: Needs-related payments are a form of supportive services paid directly to participants that enable the individual to participate in training. Needs-related payments must tie directly to the cost identified, and grantees must ensure the payments are documented to support both the participant's need for

the service as well as the actual transaction. Affiliates must have a consistent policy in place on the provision of needs-related payments (see section **11.3 Required SOAR Program Policies**). Examples of needs-related payments include expenditures toward work clothing, college application fees, and transportation to training sites and job interviews. As with emergency assistance, affiliates must leverage partnerships with other community providers before expending grant funds.

In accordance with the Funding Opportunity Announcement, up to 1.5% of grant funds awarded under these FOAs may be used to provide needs-related payments, such as those authorized under WIOA to assist participants with costs related to transportation, child care, food, or other household items, such as paying a utility bill to prevent shut off. These payments are a form of supportive services paid directly to the participants or provider that enable the individual to participate in skills training.

Provision: To request assistance, participants must describe the need to their case manager, who will complete an Emergency Assistance or Needs-Based Payment request form. The form will be reviewed by the Program Manager for approval and go through any other approval process as documented in the affiliate's policies governing internal controls. All expenditures on emergency assistance and needs-related payments must be tracked internally. Affiliate sites may not issue cash payments directly to participants. Payments will only be given to those participants with verifiable need and not exceeding an amount which would prohibit another participant from receiving the same type of assistance given a similar need, i.e., payments must be provided consistently among participants.

All internal affiliate policies that affect the provision of emergency services and needs-related payments utilizing grant funds must be submitted to OIC of America for approval prior to implementation.

3.11 Participant Wages Provision

Affiliates may use grant funds to pay for the wages of SOAR 5A (Pathways Home) and SOAR 4Y (YARP) participants where the objective assessment and the Individual Career Plan indicate that work experiences are appropriate. Further, the provision of stipends to training enrollees for the purposes of wage replacement is an allowable cost under these grants

Payment may take the form of wages or stipends. Generally, participants may receive stipends for participating in classes and training. Wages are compensation for services performed for an employer. Grantees must comply with WIOA Section 181 and WIOA regulations detailing the applicable wage and labor standards. When paying participant stipends, grantees must maintain documentation of the process for determining the amount of the stipend and the distribution. Grantees providing wages or stipends to participants should be aware of the implications under IRS provisions⁵.

3.12 Stipends and Incentives

Stipends are provided to participants as a form of wage substitution in exchange for participation in program activities. When paying participant stipends, grantees must maintain documentation of the process for

⁵ Please consult www.irs.gov for more information.

determining the amount of the stipend and the distribution. Grantees providing wages or stipends to participants should be aware of the implications under IRS provisions⁶.

Incentives are payments or items given to participants to reward milestone attainment, e.g. obtaining a credential or remaining employed for three months. Affiliates may provide incentive payments to participants for recognition and achievement tied to training activities and work experiences. Incentive payments must align with the goals of the grant. The affiliate must have policies and procedures in place governing the award of incentives; any incentives provided under the grant must align with these organizational policies. Generally, incentive payments are considered miscellaneous compensation and are taxable. Please consult www.irs.gov for more information. Affiliates can use no more than 1.5% of the grant award for incentive payments.

It is important to ensure criteria for obtaining stipends and incentives are fair and consistent for all eligible participants. Identifying certain participants within the group to receive the stipend or incentive is not allowed. All agencies providing stipends and/ or incentives must have policies and procedures defining their disbursement.

In determining support services, incentives, and stipends, please be mindful of your agency budget line item for each.

Note: Stipend and incentives payments are taxable. Consult IRS.gov for specifications.

Participants must sign the Sign-Off Forms acknowledging receipt of Incentives and/or Stipends that have a monetary value. This includes cash stipends, gift cards, bus tickets/passes, etc. Incentives and stipends should not be used to purchase alcohol, tobacco or firearms. A copy of the signed form must be placed in the participant file.

3.13 Monitoring of the Case Plan:

The case manager will schedule contacts with participants based upon risk, needs and overall Case Plan. While in the active phase of enrollment, participants must be contacted and engaged in an activity at least monthly, with OIC, or a partner provider. It is important to record monthly activity as a core service (not support service), otherwise the case will be automatically exited from the program, if there is not a new service recorded within 90 days. The SOAR program case manager is responsible for contacting the participant (and provider) to document status services on at least a monthly basis. A case manager may also accompany participants to appointments where professional representation will be of assistance. Quality of the contacts is most important. Contacts shall incorporate the use of motivational interviewing techniques. The contacts will provide the participant with information and tools needed to meet the goals and actions of his/her Case Plan. These grants require twelve-month follow-up period in which participants' progress and any additional needs and services provided must be identified and documented. During the twelve-month follow-up period monthly contact is also required. However, during this period, follow-up services must be offered (and provided based on the needs of the participants) to help ensure the performance goals are attained.

⁶ Please consult www.irs.gov for more information.

3.14 Documentation

Case notes are a crucial point of accountability in the case management, academic and technical training process. The documentation of case notes assures that there is a formal record of services, assessment of the trainee's needs, recommendations and referrals, account of trainings participated in, goal planning and progress, and assists in meeting transparency requirements. If there is no documentation of services through case notes in both the electronic system and the individual case file (this can be a hard copy file or an agency's electronic case management system), then it is considered that services or case management activities have not been provided. All contact with participants or members of the support team must be detailed in legible case notes on a monthly basis. In addition to case notes, documentation or records, are also crucial. This includes but is not limited to:

- Written permission to release educational, background and/or employment information, signed by the participant,
- Completed assessment tools and results of the initial assessment and periodic reassessments of the participant, including data on the trainee's mental/physical aptitude, medical history, academics, etc.
- The Case Plan with specified goals, interim objectives to include time frames, schedules and procedures for monitoring progress toward accomplishment of goals and objectives, as well as feedback from trainee,
- Referrals to other agencies or resources (supportive services), including follow up and feedback from or recommendations by outside agencies or individuals,
- Sign-In and Sign Off Sheets for attendance, incentive achievements, etc. and
- Program suspensions and/or other disciplinary actions.

3.15 Program Exit

It is expected that each participant will exit the program successfully within 6 to 12 months after enrollment into the SOAR program with maximum program duration of no more than 12 months. A successful exit means the young adult has satisfactorily participated in and completed the core requirements of the programs.

A successful exit occurs when a participant has completed all items from their case plan, including:

- Completed education or training,
- Earned an industry recognized credential for completion of education or training,
- Demonstrated work readiness;
- Does not require additional core workforce preparation services;
- Has completed Case Plan goals to address barriers to employment (criminogenic needs); and
- Has been placed in a registered apprenticeship, unsubsidized employment, High School or Post-Secondary Education.

Once a participant has completed the necessary components listed above, they should work with their case manager to develop an exit and follow-up plan that includes:

1. **A focus on gaining and/or maintaining unsubsidized employment**

2. **A career pathway, with specific steps toward achieving career and long-term goals which could include post-secondary enrollment including trade schools, vocational schools, colleges or apprenticeships, or a return to high school for younger program participants.**

An unsuccessful exit occurs when a participant does not complete the expected program because he or she drops out of the program, is asked to leave the program for non-compliance to program guidelines, is incarcerated, or is dismissed due to lack of participation. In the next paragraph we discuss how to carefully handle these unique participant situations that lead to unsuccessful exit.

In certain situations, participants may be kept in the program and not exited even though they are not physically at the program site due to special circumstances such as family emergencies or short-term medical issues; or they have become disengaged from the program. The case manager is responsible for maintaining contact with the participant and ensuring that the participant receives program services within a 90-day period to ensure they are not automatically exited. In the case of substance abuse or short-term mental health treatment, it is an allowable service to record in a case plan and the electronic system. So often times when the person is not physically receiving services at your organization, they may be through other partner organizations. The SOAR objective is to try to engage individuals until such time that you are certain OIC can no longer provide services. Please be advised that sites must provide a service within 90 days or the participant must be exited from the program. Whether the participant is a successful or unsuccessful exit, the OIC case manager is responsible for conducting follow-up contacts and recording those contacts for nine months after program exit.

In addition to the criterion above, individual exit determinations are at the discretion of OICA and are assessed on a case by case basis.

3.16 Follow-up:

Each participant will have a 12-month follow-up period that will begin on the date of program exit. Using the Case Plan developed jointly by the participant and case manager, the case manager will continue tracking outcomes during follow up, including:

1. Completion of program components,
2. Attainment of certificates and degrees,
3. Placement in employment, post-secondary education or return to high school,
4. Job retention,
5. Wage earnings,
6. Recidivism, etc.

For each program graduate, the case manager will offer post-program supportive services. The Case Plan will specify follow-up activities tailored to the participant's needs (criminogenic and job readiness) and goals. During the follow-up period, participants will meet with their case manager at a frequency related to their risk/needs. Low risk participants may receive contact through telephone and emails where medium to high risk participants

will be invited to take advantage of more intensive 1:1 supports. Participants placed in employment will receive a weekly phone call and/or visit to employers for the first month of placement, the frequency thereafter will be guided by risk assessment results and other collateral information. Participants who do not secure employment or who secure part-time employment will be invited to a weekly job/career resource club at their OIC Education/Training Center to receive additional employability skills training that may include (1) resume preparation, (2) completion of job applications, (3) interviewing, and (4) employment resource referrals. Through expert staff and guest presenters, participants will receive assistance in securing better paying jobs and career ladder development. Industry experts will teach networking strategies specific to participant's industry of interest.

3.17 Program Forms Required for Case Files

- 1.** Program Eligibility/Enrollment Checklist
- 2.** Eligibility Screening & Referral Form
- 3.** Proof of Eligibility
- 4.** Intake Packet (includes Enrollment Application, the Work Readiness and Barriers Assessment Form and Point Scoring Tool, Release of Information and Authorization Forms, Media Release Form and Equal Employment Opportunity Notice)
- 5.** Individual Case Plan
- 6.** Case Management Notes (hard copy or printout from electronic system)
- 7.** Support Service Request and Receipt Form
- 8.** Incentive Request and Receipt Form
- 9.** Stipend Request and Receipt Form (if applicable)
- 10.** Certificate/Degree Certification Form
- 11.** Educational Placement Verification Form (or other OICA approved form)
- 12.** Employment Placement Verification form (or other OICA approved form)
- 13.** Recidivism Documentation Form
- 14.** Other Exit Form

Policy 4: Required Partners

Purpose

Grants under this FOA must provide occupational training facilitated by a community college, in locally in-demand industries, and a college-bound track for those whose assessment, skills, and labor market experience indicate that this type of training/degree is most useful.

Expected Outcome

For all required and additional partnerships, affiliates must establish a Memorandum of Understanding (MOU) or Letter of Commitment (LOC) signed by the authorizing agent of each primary partnership organization that fully describes:

- Services provided to the partner organization or participants by OIC;
- Services provided to the OIC or participants by the partner organization;
- Procedures for enrollment or recruitment, if applicable; and
- Plan for coordination of services between partners.

MOUs and/or LOCs are expected to be fully implemented, appropriate for successful program implementation, and updated to meet outcome goals in the case of standing agreements between OIC and their partners.

4.1 Correctional Facilities (SOAR 5A)

SOAR 5A (Pathways Home) affiliates must identify, and provide a written commitment from, the state correctional facility or local jail the applicant intends to partner with for this project.

- The services provided to the organization or participants;
- Procedures for enrollment or recruitment, if applicable;
- Plan for coordination of services between partners; as well as,
- Accommodations to be provided for services to be provided;
- Resources and space supplied by the correctional facility;
- Facility requirements for inmate participation and selection;
- A strategy for internet accessibility or an alternative; and
- Security for applicant and partner staff.

4.2 Community Colleges (SOAR 5Y)

SOAR 5Y (YARP) program sites must partner with at least one community college to provide education/credentialing in locally in-demand industries and occupations. Affiliates must provide occupational training facilitated by a community college in locally in-demand industries, including but not limited to healthcare, information technology, and energy.

4.3 One-Stop Partnerships

Local One-Stops are required partners under TEGL 17-16; however, cost sharing with One-Stop Partners is no longer required. Any resources contributed to the project beyond the funds provided by the agency as leveraged resources. Developing and/or maintaining these partnerships remain highly recommended, particularly where a standing partnership has already been established.

SOAR 5 program affiliates must consult with the state and local workforce boards and verify that the selected industry sector and high-growth jobs offer employment opportunities in their local communities.

4.4 Additional Partnerships

Affiliates are encouraged to work with additional partners (other than the partner correctional facilities as required by SOAR 5A and the partner community college as required by SOAR 5Y) to leverage resources. Affiliates should identify local organizations, including employers and industry organizations, which will provide services to support program operations, such as workforce services, housing, and substance abuse and mental health treatment for participants.

- Applicants must describe the specifics of their partnership(s) and provide a Memorandum(a) of Understanding or Letter(s) of Commitment signed by the authorizing agent of the partner organization, which describes:
 - Services to be provided to the organization or participants;
 - Procedures for enrollment or recruitment, if applicable;
 - Any resources to be committed to the program.
- Applicants must explain how employers and industry organizations will be engaged in the program to provide curriculum development, occupational education, and employment pre-and-post release.
- Applicants must explain how partners will communicate pre- and post-release to support program operations and ensure that all required services are available to all program participants.

References

<https://www.dol.gov/sites/dolgov/files/ETA/grants/pdfs/FOA-ETA-20-05.pdf>

<https://www.dol.gov/sites/dolgov/files/ETA/grants/pdfs/FOA-ETA-20-05-Amendment-Two.pdf>

https://wdr.doleta.gov/directives/attach/TEGL/TEGL_17-16.pdf

Policy 5: Affiliate Monthly Program Reports

Purpose

To identify program activity reporting periods and report due dates.

Expected Outcome

Ensure required monthly program and quarterly federal progress reports (QPR and narrative) are completed and submitted on-time.

5.1 Program Narrative

For the initial three-month planning period, ending on September 30th 2019, affiliate agencies will complete one report summarizing their SOAR activities for the quarter. For subsequent months during the project, affiliates will complete and submit a monthly report to the OICA SOAR Project Coordinator and Director of Measurement and Evaluations. OICA will incorporate information from the affiliate reports and develop the required progress reports to be reviewed and approved by the Project Director and then submit them to the U.S. Department of Labor.

1. **The Monthly Program Report** is due by 4 p.m. EST on the 5th of each month following the report period's close. The report must be submitted to the OICA reporting address, reporting@oicofamerica.org. The subject heading of the email should read as follows: Grant Site Location Month Report, e.g., SOAR 5 Montgomery County February Report. The program be included as an attachment along with the program status report and SOAR Outcome Tracker (detailed below).
2. Program reports will be considered complete only after the following have been completed and submitted.
 - a) **The Monthly Program Report** form signed by the Program Manager, as well as staff who completes the report (if a different person).
 - b) Sign-In Sheets from group training sessions, **and** special event **Agendas** (if applicable), for the month. If classes are conducted on a cohort basis, a single list specifying attendance for the reporting period can be submitted.
 - c) Copies of SOAR or other OICA approved participant outcome verification forms.

The prescribed **Monthly Program Report** format must be used.

5.2 Data Reports

All data for a month should ideally be entered/updated/corrected in real time, but at the latest, all data for a month should be updated by the 5th of the following month.

By the 5th of the month:

- Sites that are using REO and QB submit their REO backend file
- Sites that are using only QB submit their QB Extended Outcomes report

5.3 Report Submission

Reports should be submitted electronically to:

reporting@oicofamerica.org

5.4 Validation Policy

All reports must be submitted on the date due. Affiliates are responsible for responding to all requests of OIC of America as soon as possible and no later than two business days at a maximum. Failure to respond to requests for follow-up from OIC of America staff may result in a compliance notice and/ or withholding of financial reimbursements. Examples of such requests include but are not limited to requests for copies of internal tracking sheets, specific paper case file items, or the REO MIS backend file, as appropriate, to assist with data verification or resolution of inconsistencies in data entry. In the case where a site is unable to respond within two business days, the affiliate site must contact OIC of America within the two business-day window and submit a timeline for submitting all required materials. This timeline may be approved or denied at the discretion of OIC of America.

Policy 6: REO MIS Usage

Purpose

To remain compliant with US Labor Department data reporting guidance.

Expected Outcome

OICA and participating SOAR affiliates will report timely and accurate data reports to the US Labor Department through its designated Management Information System (MIS).

Policy

The Department of Labor requires all grantees and sub-grantees to use the Microsoft Access REO (Reentry Opportunities) database (referred to hereafter as the MIS system) they have provided, to document participant eligibility and program enrollments, services, activities and outcomes. Sub-grantees must enter SOAR participant data into the MIS.

6.1 Software Installation and Security.

The MIS is not a cloud-based solution that will allow multiple simultaneous users. It is a single user database that must be installed in a specific folder (REO) on the C: drive of one personal computer at the sub-grantee site (It cannot be installed in a network drive). Since the database will contain participant personal identifiable information, it **MUST** be housed in a secure location. OICA recommends that sites dedicate a laptop for the database, to allow for some flexibility with data entry processes.

Like any computer file, there is the possibility that the “backend,” or actual database file could become corrupted and result in data loss. To guard against such loss, the database (file name REObackend) should be backed up on a regular basis and a copy stored in a different, also secure location (for example, a flash drive that can be kept in a locked drawer; or in a different folder on the computer itself). Sub-grantees should create a backup file on at least a monthly basis; a weekly backup is recommended, especially if users are entering new data on a daily or weekly basis.

6.2 Data Entry

Sites may choose to have case managers each enter data for their own clients, or designate one individual as the “data entry” specialist. If multiple individuals are entering data, one person should take a “quality control” role to monitor and coordinate the data entry.

6.3 REO-specific Measure (SOAR 5A).

Affiliates are also expected to track, report, and meet the recidivism rate: The percentage of participants who were in or returning from an adult correctional facility prior to enrolling in the program and have been convicted of a new criminal offense committed within 12 months of their release from the correctional facility. Grantees

have until the end of the grant period of performance to achieve this measure. **The goal for this measure is lower than the recidivism rate for the state in which the grantee is operating.**

Policy 7: Safeguarding Data Including Personally Identifiable Information (PII)

Purpose

To ensure all data exchanges conducted through or during the course of performance of the grant will be conducted in a manner consistent with applicable Federal law and TEGL NO. 39-11 (issued June 28, 2012).

Expected Outcome

Ensure confidential client information is handled within the guidelines of the DOL/ETA's, TEGL NO. 39-11 (issued June 28, 2012) "Guidance on the Handling and Protection of Personally Identifiable Information (PII)."

Policy

Personally identifiable information and sensitive data developed, obtained, or otherwise associated with DOL/ETA funded grants is securely transmitted, protected from unauthorized disclosure, retained for onsite inspections during audits or other investigations, and only retained for the period of time required to satisfy assessment or Federal retention requirement.

Personally identifiable information (PII) most commonly referred to as client-identifying and/or client-related data, whether in electronic or written form, is considered to be strictly confidential. Under no circumstances may any individual associated with OICA, either as a sub-contractor employee or volunteer, access PII information without an expressly program-required rationale for doing so. Client-identifying or client-related data disclosed or submitted, orally, in writing shall not be included in any products, materials, etc., or shared with any other person without client written permission. Neither may any individual associated with OICA, disclose to others without an express need to know any confidential client information he or she may have gained in the course of working with OICA. This includes, but is not limited to:

- Client birth dates
- Client addresses
- Client economic status
- Housing situation (homeless, shelter, etc.)
- Social Security Number
- Disability Status
- Criminal History

AND

- Eligibility and Referral Form
- Intake Packet
- Case Plan
- Case Notes
- Medical History Reports/Forms
- Attendance Records

Procedures

In the event it is necessary to share PII, caution must be exercised in doing so. To securely transmit PII via email, CDs, DVDs, thumb drives, etc., it must be encrypted using a Federal Information Processing Standards (FIPS) 140-2 compliant and National Institute of Standards and Technology (NIST) validated cryptographic module. **You must not e-mail unencrypted sensitive PII to any entity, including ETA or contractors.** Data may be downloaded

to, or maintained on, mobile or portable devices **only** if the data are encrypted using NIST validated software products based on FIPS 140-2 encryption. In addition, wage data may only be accessed from secure locations.

PII data obtained through work on the OIC SOAR grant must be stored in an area that is physically safe from access by unauthorized persons at all times and the data will be processed using recipient issued equipment, managed information technology (IT) services, and designated locations. **Accessing, processing, and storing of ETA grant PII data on personally owned equipment, at off-site locations e.g., employee's home, and non-recipient managed IT services, e.g., Yahoo mail, is strictly prohibited unless approved by ETA.** Data received as a result of the grant must be made available to ETA for inspections during regular business hours for the purpose of conducting audits and/or conducting other investigations to assure compliance with the confidentiality requirements. This data must be retained only for the period of time required to use it for assessment and other purposes, or to satisfy applicable Federal records retention requirements. Thereafter, all data must be destroyed, including deletion of electronic data.

Confidential Information is to be considered confidential and proprietary to OICA and its sub-contractors shall hold the same in confidence, shall not use the confidential information other than for the purposes of its business with the SOAR program and shall disclose it only to its officers, directors, or employees with a specific need to know. For example, if a participant is co-enrolled in other programs within the agency, or a partner agency, it is likely that some level of information will be shared about the co-enrolled participant. The signed Authorization for Release of Information gives the agency permission to share information that is necessary for the participant to receive services. Note: It is important to make sure each participant signs an Authorization for Release of Information Form at intake. Recipient will not disclose, publish or otherwise reveal any of the confidential information received from OICA and its project partners to any other party whatsoever except with the specific prior written authorization of OICA.

Consequences for failing to comply with this policy may result in suspension and/or termination of employment or agency subcontract. Depending upon the severity and nature of the confidentiality breach, the individual(s) responsible may be criminally liable as a result.

7.1 Record Retention

OICA and affiliates must follow Federal guidelines on record retention, which requires that **all records pertaining to grant activities** be retained for a period of at least three years from the date of submission of the final expenditure report. This includes program and fiscal related program documents.

Policy 8: Messaging and Public Relations

Purpose

To ensure appropriate communications regarding OIC and its SOAR program, assure consistency with program policies and help preserve the confidentiality of participant information, OIC has set forth the guidance herein for marketing and public relations activities.

Policy

The OICA CEO, or designee, has sole authority to coordinate all proactive and reactive statements to the news media on behalf of OIC and the SOAR program, its employees and subcontractors. This includes requests made by individuals and groups for news, or information, about SOAR program activities. It is necessary for consistency and accuracy to have one individual through which all news and public relations functions are conducted.

Affiliate agencies that wish to engage in media activities related to the SOAR program must receive prior approval from OICA. It is understood that from time to time you will receive last minute requests. If a request to talk to the media requires less than 24- hour notice, the following people should be contacted for approval in the following order:

Naja Killebrew, OICA Marketing and Communications Manager, nkillebrew@oicofamerica.org; and Shonique Banks, OICA Director of Partnerships, sbanks@oicofamerica.org.

The Marketing and Communications Manager is responsible for recommending, organizing and directing marketing activities including publications, press releases, printing services and website design. The OICA Marketing and Communications Manager makes all final decisions on marketing products such as outreach flyers and program brochures, press releases, etc. related to OIC and the SOAR program. Please allow 7 days for review and approval or recommended edits.

All requests for interviews, information, photographs or video/film images involving program participants and/or their families require advance consent and completion of a Media Release Form. All Media Release forms should be submitted to the OICA Marketing and Communications Manager.

Any employee or subcontractor who is contacted by the news media must refer the contact to the OICA Marketing and Communications Manager , or designee.

Policy 9: Funder Acknowledgement in Messaging

Purpose

Provide federally approved funder acknowledgement statement for use on print and other materials.

Policy

Printed materials and promotional items funded, in whole or in part, by the OICA SOAR program funds must include the funder acknowledgement. This includes newly developed or revised program brochures, formal program newsletters (but not flyers, notes, or other information routinely sent home with participants), billboards, press releases, posters, or any other external communication. The funder acknowledgement is not required on internal forms and communication.

Expected Outcome

Adhere to ETA policy on funder acknowledgement.

Procedure

Include the following approved funder acknowledgement statement on all printed and promotional items paid in whole or part with ETA funds. The font should not be smaller than 9 pt. on materials.

Intellectual Property Rights

The Federal Government reserves a paid-up, nonexclusive and irrevocable license to reproduce, publish or otherwise use, and to authorize others to use for federal purposes: i) the copyright in all products developed under the grant, including a subgrant or contract under the grant or subgrant; and ii) any rights of copyright to which the recipient, subrecipient or a contractor purchases ownership under an award (including but not limited to curricula, training models, technical assistance products, and any related materials). Such uses include, but are not limited to, the right to modify and distribute such products worldwide by any means, electronically or otherwise. Federal funds may not be used to pay any royalty or license fee for use of a copyrighted work, or the cost of acquiring by purchase a copyright in a work, where the Department has a license or rights of free use in such work, although they may be used to pay costs for obtaining a copy which is limited to the developer/seller costs of copying and shipping. If revenues are generated by selling products developed with grant funds, including intellectual property, these revenues are considered as program income. Therefore, program income must be used in accordance with the provisions of this grant award and 2 CFR 200.307.

Intellectual Property Rights and the Bayh-Dole Act. All small business firms, and non-profit organizations (including Institutes of Higher Education) must adhere to the Bayh Dole Act, which requirements are provided at 37 CFR 401.3(a) and at <https://doleta.gov/grants/pdf/BayhDoleGrantTerm.pdf>. To summarize, these requirements describe the ownership of Intellectual Property rights and the government's nonexclusive, nontransferable, irrevocable, paid-up license to use any invention conceived or first actually reduced to practice in the performance of work under this grant. These requirements are in addition to those found in the Intellectual Property Rights term provided in this document.

DOL REQUIRED MARKETING LANGUAGE

The following language must be included with any electronic or printed materials describing the SOAR program to the public to include flyers, posters, brochures, newsletters, billboards, public statements, presentations, toolkits, resource guides and the dedicated SOAR webpage.

STEVENS AMENDMENT

The following language is required on all marketing materials and affiliate websites for the SOAR program:

*“[Affiliate Site] SOAR is [insert percent funded here]% funded by [insert **total** number of DOL grants here] U.S. Department of Labor Grants (\$[total cumulative DOL funded amount]), [insert percent funded here]% funded by state and/ or local governmental resources (\$[total leveraged state/local government amount for SOAR]),, and [insert percent funded here]% funded through non-governmental resources (\$[total leveraged non-governmental for SOAR]).”*

FUNDER ACKNOWLEDGEMENT

The following language is required on all marketing materials and affiliate websites for the SOAR program:

“This workforce product was funded by a grant awarded by the U.S. Department of Labor's Employment and Training Administration. The product was created by the grantee and does not necessarily reflect the official position of the U.S. Department of Labor. The U.S. Department of Labor makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership. This product is copyrighted by the institution that created it. This product is copyrighted by the institution that created it. SOAR program is an equal opportunity employer/program, and auxiliary aids and services are available upon request to individuals with disabilities.”

EQUAL OPPORTUNITY

Recruitment brochures and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper, to staff, clients, or the public at large, to describe programs financially assisted under Title I of WIA or the requirements for participation by recipients and participants must indicate that the WIA Title I-financially assisted program or activity in question is an "equal opportunity employer/program" and that "auxiliary aids and services are available upon request to individuals with disabilities."

Requirement to Provide Certain Information in Public Communications

Pursuant to P.I. 115-141, Division H, Title V, Section 505, when issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, all non-Federal entities receiving Federal funds shall clearly state:

1. The percentage of the total costs of the program or project which will be financed with Federal money;
2. The dollar amount of Federal funds for the project or program; and
3. The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

Creative Commons Attributions License

As required at 2 CFR 2900.13, any intellectual property developed under a competitive award process must be licensed under a Creative Commons Attribution 4.0 (CC BY) license, which allows subsequent users to copy, distribute, transmit and adapt the copyrighted work and attribute the work in the manner specified by the recipient. For general information on CC BY, please visit <http://creativecommons.org/licenses/by/4.0>. The Instructions for marking your work with CC BY can be found at <http://wiki.creativecommons.org/Marking your work with a CC license>.

Publicity

No funds provided under this grant shall be used for publicity or propaganda purposes, for the preparation, distribution or use of any kit, pamphlet, booklet, publication, radio, television or film presentation designed to support or defeat legislation pending before the Congress or any state or local legislature or legislative body, except in presentation to the Congress or any state or local legislature itself, or designed to support or defeat any proposed or pending regulation, administrative action, or order issued by the executive branch of any state or local government, except in presentation to the executive branch of any state or local government itself. Nor shall grant funds be used to pay the salary or expenses of any recipient or agent acting for such recipient, related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or Executive Order proposed or pending before the Congress, or any state government, state legislature, or local legislative body other

Policy 10: Financial Accountability

Purpose

Provide guidance to ensure grant funds are used in accordance with federal OMB policies and guidelines.

Expected Outcome

Ensure compliance with federal OMB policies.

Policy

Any purchase made with federal funds must be solely for the purpose of allowable activities and costs per federal guidelines (OMB Circular A-122—Cost Principles for Non-Profit Organizations), and solely related to the federally funded program unless cost allocated to another program or funding source. SOAR grant funds may be used to support the objectives and outcomes of the SOAR Project.

10.1 Cost Allocations

Each OIC affiliate is required to have in place an agency budget that documents cost allocation principles. The cost allocation plan must be reasonable and whenever possible, based on allocation of staff to the grant. For example, if an agency employs 20 full-time staff and only one full-time staff is charged to the SOAR grant, it would be unreasonable to charge 75% of the agency facility or supply cost to the grant. The plan must clearly identify how shared cost expenses are split between all programs/funding sources and the amount charged directly to the federally funded program. This plan will be reviewed by OICA.

Affiliates may make purchases for equipment and supplies such as a computer and general office supplies that are not 100% used for the federally funded program. This often occurs when a position is shared by multiple funding sources. In such cases, affiliates must first determine the projected percentages of time to be used by the OIC SOAR program and by other programs and then document the fair allocation to each.

10.2 Cost Reimbursement

SOAR is a cost reimbursement contract. This means that any expenditure must be paid for before the cost reimbursement request is made to OICA. OICA does not reimburse before-the-fact anticipated expenses for the SOAR program.

The following should be submitted with all draw requests for cost reimbursements:

- 1) Draw Request Documentation Form as a cover page;
- 2) SOAR Monthly Expense Report;
- 3) General Ledger with details of all SOAR expenses; and
- 4) Payroll Registry with all SOAR salaries and fringe benefits.

Procedure

- 1) Affiliates must **submit a monthly fiscal report of spending to OICA by the 5th of each month**. This includes a Draw Request and Expense Report with supporting documentation to Rachid Echane, OICA Fiscal Coordinator, rechane@oicofamerica.org.
- 2) Draw requests must be signed by the Authorizing Agent. See Policy 4: Affiliate Monthly Program Reporting for contact information of the respective personnel.

- 3) OIC of America will conduct one Spot Check on each Expense Report submitted by a SOAR affiliate, before approving a draw request.
- 4) OIC of America will randomly select 2 or more items and request supporting documentation to substantiate each expense. If the affiliate cannot furnish the specific requests, for any reason, OIC of America may require that the affiliate submit all supporting documents for each expense listed on the Expense Report.
- 5) Each affiliate is to keep all supporting financial documents on file and provide them within 24 hours (1 business day) upon OICA's request.

Affiliate sites must track all supportive service, incentive, and stipend payments issued to program participants. This includes maintaining and submitting program **Expenditure Ledgers** (provided in the SOAR Forms portfolio) when requested as a spot check item.

10.3 Provisions for Selected Items of Costs

Equipment: Award Recipients must receive **prior approval** from OIC of America to purchase any equipment as defined in the Uniform Guidance at 2 CFR 200.33 (current threshold is \$5,000). Prior approval is required only when the acquisition cost is \$5,000 or more regardless of the non-Federal entity's capitalization threshold. Equipment purchases must be made in accordance with 2 CFR 200.313 or 2 CFR 200.439.

Being awarded this grant **does not** automatically mean you are approved for the equipment specified in a recipient's budget or statement of work unless it is specifically approved by the Grant Officer. If not specified above, the recipient must submit a detailed list describing the purchase to the FPO for review within 90 days of the Notice of Award date. We strongly encourage recipients to submit requests for equipment purchase as early as possible in the grant's period of performance with as many planned pieces of equipment as possible.

Recipients may not purchase equipment during the last year of the period of performance or the last year of full program service delivery (not follow up activities) whichever comes first. This may not be the same as the last twelve months of the period of performance. If any approved acquisition has not occurred prior to the last funded year of performance, approval for that item(s) is rescinded.

Stipends and Work Experience Wages: Grantees, through their sub-grantees, may set aside up to 25 percent of grant funds for stipends and work experience wages. For more information about funds for stipends and work experience wages, see Section IV.E.4.

Food Purchases: DOL restrictions on food purchases are very tight and make provision of food unfeasible.

Travel Cost Reimbursements. Pursuant to 2 CFR 200.474(a), SOAR affiliate sites must have policies and procedures in place related to travel costs; however, for reimbursement on a mileage basis, this grant cannot be charged more than the maximum allowable mileage reimbursement rates for Federal employees. The 2021 mileage reimbursement rates are \$0.56/mile for privately owned automobiles.⁷

⁷ Mileage rates must be checked annually at www.gsa.gov/mileage to ensure compliance.

Foreign travel is not allowable except with prior written approval from OIC of America. All travel, both domestic and -approved foreign travel, must comply with the Fly America Act (49 USC 40118), which states in part that any air transportation, regardless of price, must be performed by, or under a code-sharing arrangement with, a US Flag air carrier if service provided by such carrier is available.

10.4 Expense Reimbursement Period

Program expenses that were paid in excess of 6 months prior to the date of the reimbursement request will not be eligible for reimbursement without an explicit allowance from OICA. Draw requests must be submitted when due and OICA reserves the right to request additional spot check items and quality controls for late draw requests.

10.5 Data Reporting

A critical component of the program’s success is accurate sub-grantee reporting to OICA and, in turn, the US DOL. In line with sub-grantee service agreements, OICA requires the monthly submission of accurate quantitative and qualitative program reports as detailed in **Policy 5: Affiliate Monthly Program Reports**. OICA maintains the right to withhold pending reimbursements if complete and accurate program reports have not been received in compliance in Policy 5, as assessed by the OICA Director of Evaluations and Measurement.

10.6 Lobbying and Fundraising with Grant Funds

Purpose

In accordance with Section 18 of the Lobbying Disclosure Act of 1995 (Public Law 104-65) (2 U.S.C. 1611), non-profit entities incorporated under Internal Revenue Service Code Section 501(c)(4) that engage in lobbying activities are not eligible to receive Federal funds and grants.

Policy

OICA and affiliate personnel must not use any SOAR program funds to pay any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

OICA requires all subcontractors/sub-awards at all tiers to certify and disclose lobbying and political activities, accordingly.

Expected Outcome

No activity, including awareness-raising and advocacy activities, may include fundraising for, or lobbying of, U.S. Federal, State or Local Governments (see 2 CFR 200.450 for more information).

10.7 Budget Control and Modification

All SOAR expenditures must be allocable to cost categories within approved affiliate budgets. Spending cannot exceed an affiliates’ approved budget. Sub-grantees may request budget modifications during the grant period to ensure spending is aligned with SOAR program objectives. A budget modification must be requested using the SOAR budget modification request template to the OICA Fiscal Coordinator. Final approval is given by the OICA Director of Operations.

10.8 Excess Resources

To ensure funder obligations are met, and funds are utilized to their greatest potential to increase outcome attainment, OICA maintains the responsibility to reallocate funding in cases where initial Sub-recipient spending projections exceed actual funds expended and obligated for service delivery. Determinations will be made by OICA, based on OICA financial analyses by or before the second to last quarter of the grant. When determined that funds exist that will not be utilized by the Sub-recipient, OICA may reallocate these funds to other areas of the broader grant project, outside of the scope of the Subrecipient, to be utilized for increased service delivery.

10.9 Improper Payments

In cases when an improper payment is made to a SOAR affiliate, the payment will be reimbursed by the affiliate. Reimbursement can take the effect of a check written to OICA or an adjustment in a subsequent draw request as determined by the OICA Director of Operations.

10.10 Emergency Declarations

In cases of declared state or national emergencies, OICA may process a draw request without supporting documentation for requested spot check items, if the emergency prevents the site from accessing supporting documentation. In these cases, the site is to provide the requested backlog of supporting documentation once the site regains access to these materials.

Once the spot check documentation is received, the affiliate is responsible for reimbursing any unallowable costs as a result of the spot-check review. OICA maintains the right to request additional supporting documentation on previously submitted reimbursement requests to confirm costs are allowable, allocable, and reasonable.

Policy 11: Hiring, Employment Practices, and Required Program Site Policies

11.1 Nondiscrimination and Equal Opportunity

As a condition to the award of financial assistance from the Department of Labor under Title I of WIOA, the grant applicants must assure that it will comply fully with the nondiscrimination and equal opportunity provisions of the following laws: Section 188 of WIOA, which prohibits exclusion of an individual from participation in, denial of the benefits of, discrimination in, or denial of employment in the administration of or in connection with any programs and activities funded or otherwise financially assisted in whole or in part under Title I of WIOA because of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status, or participation in a program or activity that receives financial assistance under Title I of WIOA. Section 188 of WIOA incorporates the prohibitions against discrimination in programs and activities that receive federal financial assistance under certain civil rights laws, including Title VI of the Civil Rights Act of 1964 (Title VI) (prohibiting discrimination based on race, color, or national origin in programs and activities receiving federal financial assistance), Title IX of the Education Amendments of 1972 (Title IX) (prohibiting discrimination based on sex in education and training programs receiving federal financial assistance), the Age Discrimination Act of 1975 (prohibiting discrimination based on age), and Section 504 of the Rehabilitation Act (Section 504) (prohibiting discrimination based on disability).

Notice. (a) OICA will provide initial and continuing notice that it does not discriminate on any prohibited ground. This notice must be provided to:

- Registrants, applicants, and eligible applicants/registrants;
- Participants;
- Applicants for employment and employees;
- Unions or professional organizations that hold collective bargaining or professional agreements with OICA;
- Sub-recipients that receive WIOA Title I funds from the recipient; and
- Members of the public, including those with impaired vision or hearing.

(b) As provided in §37.9, OICA will take appropriate steps to ensure that communications with individuals with disabilities and English language barriers are as effective as communications with others.

Content of Notice: The Notice will communicate the following:

1. Neither OICA nor its SOAR program Affiliates and sub-recipient service partners will discriminate on the following bases:
 - against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and
 - against any beneficiary of programs financially assisted under Title I of the Workforce Investment Opportunity Act (WIOA), on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIA Title I-financially assisted program or activity.
 - OICA and SOAR program partners must not discriminate in any of the following areas:
 - deciding who will be admitted, or have access, to any WIOA Title I-financially assisted program or activity;
 - providing opportunities in, or treating any person with regard to, such a program or activity; or

- making employment decisions in the administration of, or in connection with, such a program or activity.

2. *[Note: In this subsection, the term “individual” will be used to refer to individuals enrolling in program services, OIC employees and individuals who apply for OIC employment in the SOAR program]*

OICA and its affiliates will inform each SOAR program participant, employee, and applicant for employment, verbally and in writing, of the prohibition against discrimination and the following procedure for filing a complaint.

Individuals who think that they have been subjected to discrimination under a WIA Title I-financially assisted program or activity may file a complaint within 180 days from the date of the alleged violation with either:

- OICA Senior Director of Operations and Strategy, Jason Whyte, 1415 North Broad Street, Philadelphia, PA
- the Director, Civil Rights Center (CRC), U.S. Department of Labor, 200 Constitution Avenue NW, Room N-4123, Washington, DC 20210.

Individuals who file their complaint with OICA must wait either until OICA issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above).

If OICA does not give the individual written Notice of Final Action within 90 days of the day on which the complaint was filed, the individual does not have to wait for OIC to issue that Notice before filing a complaint with CRC. However, the individual must file the CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which the complaint was filed with OICA).

Any individual given a written Notice of Final Action by OICA on a complaint who is dissatisfied with the decision or resolution may file a complaint with CRC. The individual must file the CRC complaint within 30 days of the date on which the Notice of Final Action was received.

Dissemination of Notice and Policy

1. OICA will inform its own and SOAR program sub-recipient service partner staff about this policy during the partner training at the beginning of each project year.
2. Applicants for employment in SOAR program positions will be informed of this policy.
3. Each SOAR program participant, employee, and applicant for employment will be presented with the Nondiscrimination and Equal Opportunity Notice and Acknowledgement form, which will contain the contents of the Notice. OICA staff will explain the policy to the participant, provide them with the opportunity to ask questions, and request their signature on the form. Signed forms will be inserted in all participants' files and they will be given a copy.
4. OICA will post the Notice prominently at its offices and include it in the SOAR Program Policies and Procedure manual that will be disseminated to each SOAR and partner agency SOAR staff.

5. During each presentation to orient new participants, new employees, and/or the general public to the SOAR Program, OICA will include a discussion of rights under this policy, including the right to file a complaint of discrimination with OICA or the CRC Director.

Information to be Included in Publications, Broadcasts, and other Communications.

OICA will:

1. indicate that the SOAR program is an “equal opportunity employer/program,” and that “auxiliary aids and services are available upon request to individuals with disabilities,” in recruitment brochures and other materials that are distributed or communicated in written and/or oral form, electronically and/or on paper, to staff, clients, or the public at large, to describe the program or the requirements for participation by recipients and participants. Where such materials indicate that OICA may be reached by telephone, the materials must state the telephone number of the TDD/TTY or relay service used by OICA.
2. when publishing or broadcasting program information in the news media, ensure that such publications and broadcasts state that the SOAR program is an equal opportunity employer/program (or otherwise indicate that discrimination in the WIA Title I-financially assisted program or activity is prohibited by Federal law), and indicate that auxiliary aids and services are available upon request to individuals with disabilities.
3. refrain from communicating any information that suggests, by text or illustration, that the recipient treats beneficiaries, registrants, applicants, participants, employees or applicants for employment differently on the basis of race, color, religion, sex, national origin, age, political affiliation or belief, except as such treatment is otherwise permitted under Federal law.

Responsibilities to Provide Services and Information in Languages other than English

If a significant number or proportion of the population eligible to be served, or likely to be directly affected, by the SOAR program need services or information in a language other than English into be effectively informed about, or able to participate in, the program or activity, OICA will:

1. Consider: (i) The scope of the program or activity, and (ii) The size and concentration of the population that needs services or information in a language other than English; and
2. Based on those considerations, take reasonable steps to provide services and information in appropriate languages. This information will include the initial and continuing Notice discussed above, and all information required to be communicated in all publications, broadcasts, and other communications concerning the SOAR program (above).

In circumstances other than those described in paragraph (a) of this section, OICA will nonetheless make reasonable efforts to meet the particularized language needs of limited-English-speaking individuals who seek services or information about the SOAR program.

References

11.2 Whistleblower Rights

The Occupational Safety and Health Administration (OSHA) administer the employee protection or “whistleblower” provisions of seventeen statutes.

Under the **Occupational Safety and Health Act (OSH Act)**, employees may file complaints with OSHA if they believe that they have experienced discrimination or retaliation for exercising any right afforded by the OSHA act, such as complaining to the employer union, OSHA, or any other government agency about workplace safety or health hazards; or for participating in OSHA inspection conferences, hearings, or other OSHA-related activities.

Generally, the employee protection provisions listed above prohibit covered employers from discharging or otherwise discriminating against any employee because the employee engaged in certain activities protected by law.

The protected activities typically include:

- Initiating a proceeding under, or for the enforcement of, any of these statutes, or causing such a proceeding to be initiated;
- Testifying in any such proceeding;
- Assisting or participating in any such proceeding or in any other action to carry out the purposes of these statutes; or
- Complaining about a violation.

Many of the statutes specifically protect an employee's internal complaints to his or her employer, and it is the Department of Labor's position, as set forth in regulations, that employees who express safety, or quality assurance concerns internally to their employers are protected under all of the whistleblower statutes administered by OSHA.

Any employee who believes that he or she has been discriminated or retaliated against in violation of any of the statutes listed above may file a complaint with OSHA. Complaints must be filed within 30 days after the occurrence of the alleged violation under the OSH Act, CAA, CERCLA, SWDA, FWPCA, SDWA, and TSCA; within 60 days under ISCA; within 90 days under AIR21, SOX, and AHERA; and within 180 days under STAA, ERA, PSIA, FRSA, NTSSA, and CPSIA.

If the Secretary of Labor has not issued a final decision within 180 days of the filing of a SOX complaint, one year of the filing of an ERA complaint, or 210 days of a STAA, FRSA, NTSSA, or CPSIA complaint, and there is no showing that there has been delay due to the bad faith of the employee, the employee may bring an action at law or equity in district court under those statutes.

11.3 Required Organizational Policies for SOAR Program Site

All SOAR program affiliate sites are required to include a **Nondiscrimination and Equal Opportunity** policy as well as a **Whistle Blower** policy (as outlined above) as well as the following additional items as part of their program policies handbook:

- Policies covering work hours, compensation rates, including overtime, and benefits; vacation, sick or other leave allowances, hiring and promotional policies;
- Policies in place to safeguard employee protected personally identifiable information (PII) and other information designated as sensitive;
- A fraud, waste, and abuse policy;
- An Americans with Disabilities Act policy to provide reasonable accommodations for staff with disabilities;
- A written policy on providing a drug and alcohol free workplace;
- A signed Civil Rights/Anti-Discrimination policy on file for each staff person;
- A sexual harassment policy; and
- Grievance procedures;

11.3 Required Participant Policies for SOAR Program Site

It is strongly recommended that affiliates develop a Participant Handbook to be disseminated to program participants at the time of acceptance into the program. All sites must at minimum have documentation of the following required policies and procedures to direct SOAR program activities:

- Eligibility
- Documentation
- Intake and Enrollment
- Organization Protocol
- Grievance Policy
- Program Offerings
- Program Protocols
- Program Expectations
- Selective Service
- Disciplinary Action
- Legal Documents
- Virtual Engagement Expectations
- Stipends and Incentives
- Signed Agreement
- Follow-up expectations
- Monthly performance reporting
- Data reporting

Due to the required partners for SOAR 5A and SOAR 5Y, additional policies will further be required as safeguards for affiliate sites during program operation. A Policy Manual Checklist has been included in Appendix A for affiliate internal review of program Policies and Procedures. These policies will be reviewed during **Monitoring and Grant Oversight** activities (see **10.3 Program Review** section in the above **Policy 10: Monitoring and Grant Oversight**).

Policy 12: Monitoring and Grant Oversight

Purpose

Provide guidance on affiliate oversight procedures, including compliance alerts, corrective actions, and program reviews conducted by OIC of America Quality Assurance staff. This policy does not outline financial (Policy 9) or programmatic reporting (Policy 4). All interventions by OICA are to ensure fidelity of programming.

Expected Outcome

Establishing methods of oversight to identify and correct deficits of program implementation. All interventions are designed to ensure fidelity of programming.

Reference

2 CRF 200.331 (d) [All pass-through entities must] Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes in compliance with Federal Statutes, regulations, and the terms and conditions of the subaward; and the subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:

- (1) Reviewing financial and performance reports required by the pass-through entity.
- (2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient for the pass-through entity detected through audits, on-site reviews, and other means.
- (3) Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by 2 CFR 200.521 Management decision

12.1 Corrective Actions

Policy

In ensuring fidelity of programming, OICA will place a program on Correction Action when the program has been identified as not meeting their contractual obligations or at risk of not meeting contractual obligations. OIC of America reserves the right to implement any and all corrective action interventions as deemed necessary. Corrective Actions will commonly address one the following areas:

- *Low Performance:* The program is not meeting one or more outcome goals and is at risk of not meeting their goals by the conclusion of the grant period.
- *Operational Deficit:* The program has inadequate systems or internal processes in place to ensure program operation in line with contractual obligations. Common examples include understaffing and inadequate training offerings.

Procedure

When OICA determines a corrective action as necessary, it will issue a Notice of Corrective Action to affiliate leadership. The Notice of Corrective Action will include 1) the program areas that require corrective action, 2) the corrective action period, 3) required outcomes by the conclusion of the corrective action period, 4) a corrective action workplan template to be completed by the affiliate and returned to OICA, and 5) a date for a followup meeting.

The affiliate is to return the corrective action workplan at a date specified by OICA. The corrective action process is a collaboration between OICA and the OIC affiliate. As such, OICA will review the workplan with affiliate leadership during a follow-up meeting. Any changes will be made by OICA, and a final draft of the corrective action workplan will be sent to the affiliate by OICA.

Consequences of Not Meeting Corrective Action Objectives. At OICA's determination, one of the following may result at the conclusion of the corrective action period, given inadequate performance:

- OICA may assign additional TA requirements to on-site SOAR staff.
- Program audits conducted by OICA.
- Refusal of reimbursement for specific personnel costs.
- Restructuring funding to a performance-based arrangement in which the disbursement of grant funds will be proportional to the amount of enrolled participants.
- Any further corrective action as deemed necessary by OICA to ensure fidelity with grant requirements.

12.2 Compliance Alerts

Policy

Prior to, or in lieu of a Correction Action, the OICA Quality Assurance department may issue a compliance alert to programs which fall below expected standards. Compliance alerts may be initiated from any OIC of America department for any of categories referenced under 10.1 Corrective Actions. Examples of compliance alert triggers include, but are not limited to, a site exceeding the maximum case load per case worker or falling behind outcome measure benchmarks.⁸ Compliance alerts may also be sent prior to an occasion on non-compliance, as alert to potential forthcoming non-compliance. Situations that will prompt a compliance alert but not a corrective action are instances of non-compliance which represent minor deviations from program activities rather than more chronic or systematic issues.

Procedure

A compliance alert will be issued by the OICA QA department to affiliate program leadership. The alert will reference the area of non-compliance or risk of non-compliance. Affiliate leadership will then submit a written

⁸ OIC of America recommends that affiliate sites undertake risk assessment measures from the start-up period throughout the lifecycle of the RP2 grant. Risk assessment measures will ideally entail fully integrated processes to (1) identify, (2) analyze and evaluate, and (3) respond to assessment results. For example, this could be fulfilled by reviewing case files amongst frontline staff to assess completeness of documentation and/or model fidelity based on the program objectives as stated in the participant's career plan.

plan to OICA detailing how the area of non-compliance will be remedied. OICA will either accept the plan or work with the affiliate to revise the plan. Should the issue persist, OICA will issue a corrective action.

12.3 Program Reviews

Policy

OICA will conduct at least one comprehensive program review during the grant period. More than one may be conducted, as determined necessary by OICA. Program Reviews will cover the following areas: Program Design and Governance, Financial Functions, Administrative Functions, Service Delivery, and Outcome Attainment.

Procedure

A program review will consist of both a desk review and a field review. Information gathered from both will inform the final report.

Desk Review

The desk review shall consist of, but shall not be limited, to (this can be done electronically or in a field review):

1. Review contracts, MOUs, documents, and related correspondence
2. Review applicable Federal and State Regulations
3. Review Budget and Expenditure reports
4. Review audits as necessary
5. Review prior monitoring reports
6. Review equipment inventory and identify equipment/property that needs inspection (if any)
7. Review Agency Policy and Procedures Manual, including:
 - EEO Policy
 - Whistleblower Policy
 - Record Retention
8. Review Agency Fiscal Policy and Procedures Manual, including:
 - Procurement Policy
 - Internal Controls

9. Review Personnel Files, including:

- Job Descriptions
- Resumes

Items required for desk review will be requested 10 days prior to the review date in a written correspondence.

Field Review

The field review shall consist of, but shall not be limited, to:

1. Entrance Conference - A description of the scope and purpose of the monitoring, including grant areas (program, fiscal, etc.) to be reviewed and determination that information required to complete monitoring visit is available at the site. (Note: The subrecipient shall receive a current listing of all participants in the MIS system prior to the review.)
2. Site Tour – OICA will tour the program site including participant training areas. OICA will review whether:
 - Equipment is tagged and used for SOAR purposes (as applicable)
 - Buildings and facilities funded with contract funds are being used for project purposes and are adequate for successful program operations
 - Proper care and attention is being given to the maintenance, repair, and protection of property.
 - Personal Identifiable Information is kept in a secure location, accessible only to staff for whom it's necessary for job performance.
3. Interviews:
 - With staff involved with the OICA contract activity (including fiscal staff); participants; and other relevant stakeholders.
 - Partner visits:
 - OICA will visit two partners important to operations of the program
4. A review of:
 - Participant Case Files
 - Supportive Service, Incentive, and Stipend Logs
 - Equipment Log

- Other materials as deemed relevant and necessary to assess appropriate program operation
5. Exit Interview will be held with appropriate staff of the subrecipient when the monitoring visit is completed. Problem areas will be discussed in general terms; in addition, the monitor will provide information about observations of procedures, processes and programs which may be cited for replication.

Monitoring Report

Monitoring Report - A monitoring report shall be written as a result of the desk review, field review, and other related activities. The report will state the objectives, scope and methodology of the monitoring; and will clearly state areas of concern, best practices, recommendations, and whether corrective action is required. Findings will contain a statement of criteria (Regulation, Directive, or Contract Clause), the condition found, the cause of the problem and what corrective action is required.

A report of findings will be issued to the subrecipient within 30 days of the exit conference. Resolution of corrective action shall be sought until all issues are concluded. A copy of the report and correspondence will be filed in the master contract file at OICA

Procedure for Closing a Monitoring Report

- **Closure Letter**
 - 2.2 If the subrecipient response to the monitoring report is deemed sufficient or corrective action has taken place, a closure letter will be initiated by OICA. Where appropriate, findings shall remain open pending monitoring follow-up.
- **Corrective Action**
 - Should the subrecipient response be inadequate, or the area of concern be severe enough OICA will request an official corrective action.
- **Follow-up Monitoring**
 - 2.3 Validation of corrective action taken will be made and documented through follow-up monitoring.

Additional considerations shall be made as necessary in response to the COVID public health crisis. Should health concerns and/or travel restrictions preclude Quality Assurance staff from traveling to affiliate sites, OIC of America will conduct virtual monitoring activities according to the regular review schedule.

12.4 Additional Oversight.

Policy

OICA reserves the right to conduct any additional oversight beyond the scope of the aforementioned as appropriate to ensure successful operation of the SOAR program. Additionally, depending on the severity of the

compliance issue and/or program performance lapse, OICA reserves the right to undertake any additional corrective intervention as necessary, up to and including the reallocation of grant funds.

12.5 Appeals Process.

Policy

Any site that feels as though they have either received a compliance alert or corrective action notice in error may submit a written appeal.

Procedure

A written appeal should be addressed to the attention of the OIC Senior Director of Operations and Strategy. This appeal should include the specific corrective action, site the reason for the corrective action as provided by OIC of America, and all necessary documentation supporting the appeal claim. Appeals will be reviewed on a case-by-case basis by the OIC Senior Director of Operations and Strategy.

Policy 13: Effort Reporting and Staff Allocations

Purpose

Effort reporting is a process mandated by the Federal government to verify that direct labor charges to federally sponsored contracts are reasonable and reflect actual work performed. Cost allocations are the percentages of time charged to the funding source based on actual work performed. These two go hand-in-hand.

Policy

This policy establishes the requirements of, and includes the procedures for, recording and reporting employee time and effort, and charges to the grant for staff time in accordance with Office of Management and Budget (OMB) Circulars. This policy applies to all OIC and subcontractor personnel whose compensation is charged, in whole or in part, to the SOAR program.

Expected Outcome

Employee and subcontractors' personnel time sheets and cost allocations will reflect the actual time staff spent working on the SOAR program.

13.1 Effort Reporting and Staff Allocation Procedure

1. Employees will track the amount of time they spend working on the program on their agency timesheet.
2. Timesheets are to be signed and on file with the agency at all times. Timesheets are not to be pre-filled with employee hours, per funding source, if the employee is working on multiple programs/funding sources unless the staff and agency can attest to the staff person always spending that amount of time on the program.
3. If a staff person is cost allocated to the SOAR program 100%, he/she must work on the program 100% of the time and his/her timesheet must reflect this. If the staff person works on the program 30 hours per week or 75% of his/her work week, the timesheet must reflect this and the allocation to the grant and payment out of SOAR program funds must match this information.
4. If a staff person is charged 100% but regularly works on another program 10 hours per week, the agency is in violation of the federal OMB policy, as the staff person should be charged to the SOAR grant 75% and to the funding source for the other program 25%.
5. If an agency and staff person is unsure how much time one program will require compared to another, the agency is strongly encouraged to complete a time study of a minimum of three months to determine general total hours per day spent on each funding source. This should occur during the standard program activity period for most accurate reporting. The time study period and results should be documented, signed and on file for review during program and agency audits to justify the cost allocation to the grant. **It is not permissible to charge staff to the SOAR program or other federal sources based solely on availability of funds.**

6. Failure to comply with OMB Circular effort reporting requirements can result in serious penalties for the individual certifying to effort and/or the agency. This can include financial audit disallowances, and in some cases, criminal charges may be brought against an individual certifying to a falsified effort report. Therefore, subcontractors must maintain and document how individuals spend their time with regard to the SOAR program.

13.2 FTE Allocation Changes

Affiliates are required to update financial documentation and immediately inform OICA of employee FTE allocation changes upon:

- Manager request to change his/her personnel task allocation.
- After a new hire.
- After employee leaving the organization.
- After receiving a new grant.
- After ending a grant.

The affiliate Fiscal Coordinator will make the FTE reallocation based on the above factors and send the new FTE allocation to the affiliate controller, OICA Fiscal Coordinator Rachid Echane at rechane@oicofamerica.org, and all pertinent Program Managers. It is the responsibility of affiliate Program Managers and affiliate leadership to share the new allocation with their team and ensure FTE distributions correspond with allocation of staff effort. It is the responsibility of all YARP 2 affiliate sites to ensure that all required staff FTE is filled to ensure full-service delivery. Affiliates must submit a budget modification to OICA for review and approval before making changes to allocable FTE distributions for grant-funded staff.

Policy 14: Definition of Credential

Purpose

To provide guidance on what the U.S. Department of Labor (DOL), recognizes as a credential program.

Expected Outcome

All post-secondary degrees, diplomas, licenses, certificates and certifications programs shall meet the DOL definition of credential.

Policy

The OIC SOAR program will adhere to the guidelines in the DOL Employment and Training Administration's (ETA) Training and Guidance Letter (TEGL) No. 15-10 (dated December 15, 2010) and TEGL No. 25-19 (dated June 8, 2020).

Procedures

SOAR staff shall reference the DOL/ETA's Training and Guidance Letter (TEGL) No. 15-10 (dated December 15, 2010) and TEGL No. 25-19 (dated June 8, 2020) that established "credential" as the umbrella term encompassing postsecondary degrees, diplomas, licenses, certificates, and certifications. Of significance, the TEGL states that certificates awarded by workforce investment boards are not included in this definition, nor are work readiness certificates because neither of them document "measurable technical or occupational skills" necessary to gain employment or advance within an occupation.

There is no comprehensive national list of approved credentials. However, the referenced TEGs provides detailed information on understanding and defining credentials, tools for identifying credentials, acquiring and leveraging credentials, available indicators of quality and value, examples of existing credential models and a list of the types of organizations and institutions that award industry-recognized credentials.

<http://wdr.doleta.gov/directives/attach/TEGL15-10.pdf>. https://wdr.doleta.gov/directives/attach/TEN/TEN_25-19.pdf.

For this program, each affiliate identified a preliminary list of credential programs in the DOL approved Statement of Work. OICA will maintain a list of approved certification programs.

SOAR program staff will document information on participant credential attainment in case files and in electronic system.

Related Forms

- N/A

References

- DOL Employment and Training Administration’s (ETA) Training and Guidance Letter (TEGL) No. 15-10 *Increasing Credential, Degree, and Certificate Attainment by Participants of the Public Workforce System: Credential Resource Guide* (dated December 15, 2010.)
- DOL Employment and Training Administration’s (ETA) Training and Guidance Letter (TEGL) No. 25-19 (dated June 8, 2020).
- Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128, 2014 • Workforce Investment and Opportunity Act Final Rule, 81 Fed. Reg. 56071 (Aug. 19, 2016)
- TEGL No. 10-16, Change 1, Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III and Title IV Core Programs, dated August 23, 2017
- TEGL No.14-18, Aligning Performance Accountability Reporting, Definitions, and Policies Across Workforce Employment and Training Programs Administered by the U.S. Department of Labor (DOL), March 25, 2019
- Employment and Training Administration – Workforce Innovation & Opportunity Act: <http://www.doleta.gov/wioa>
- Employment and Training Administration – Performance and Results: <http://www.doleta.gov/performance>
- Office of Apprenticeship’s Bulletin 2015-10, Program Performance–Calculation of Register
- Apprenticeship Program Completion Rates <https://www.doleta.gov/OA/bul15/2015-10.pdf>;
- Apprenticeship Programs, Labor Standards for Registration, Amendment of Regulations Final Rule, 85 Fed. Reg. 14294 (May 11, 2020)
- Credential Attainment E-Learning Module: <https://performancereporting.workforcegps.org/resources/2018/07/02/19/10/CredentialAttainment-E-Learning-Module>;
- Credential Attainment Resource Page: <https://performancereporting.workforcegps.org/resources/2017/12/18/18/43/CredentialAttainment-Resource-Page>; and
- WIOA Desk Reference - Credential Attainment Indicator Decision Path: <https://performancereporting.workforcegps.org/resources/2017/10/10/17/25/WIOA-DeskReference-Credential-Attainment-Indicator-Decision-Path>.
- For additional information and guidance please see the DOL Credential Resource Guide at: <https://wdr.doleta.gov/directives/attach/TEGL15-10a2.pdf>

Policy 15: Grant Closeout

Purpose

At the end of the grant period, the award recipient will be required to close the grant with the ETA per 2 CFR 200.344. During the closeout process, the grant recipient must be able to provide documentation for all direct and indirect costs that are incurred.

Month End Closing

Cash receipts and cash disbursements represent a significant part OICA's monthly cash activities. Cash receipt and cash disbursement activities are reviewed in conjunction with preparing the monthly bank reconciliation. The procedures are as follows:

- Controller will close and balance the cash receipts and cash disbursement registers.
- Controller will review the totals for any unrecorded entries and will prepare journal entries to record the transactions in the system.
- Controller will back up the system.

The Controller will review the cash register in conjunction with revenue and expenses for reasonableness and will review and approve each journal entry indicating approval by initialing each entry. The Controller will also review the reasonableness of the detailed general ledger ending balances and journal entries as well as the reasonableness of the financial statement amount.

Grant Contract Closing

The primary objective is to report to the funding agency expenses incurred year to date under the program and the financial statements report thereon is in agreement with the general ledger balances in the system. The accounting basis should be accrual basis. The procedures are as follows:

- The Controller will prepare the financial statements generated from the system
- Exam the details in the general ledger runs
- Prepare billings report to the funding agent.

The Controller will review the financial report before it goes out.

Further information on the closeout process for DOL grants may be found at the following link:
<https://www.dol.gov/agencies/eta/grants/management/closeout>.



Appendix A: Policies & Procedures Planning Checklist

ORGANIZATION ELEMENTS	INCLUSION DATE	COMMENTS
Mission		
Operations/Protocols		
Personnel		
Grant Requirements		
Data Management		
Confidentiality Agreement		
Drug Use Policy		
Cell phone usage		
Grievance Procedures		
Sexual Harassment		
Diversity/Inclusion		
EEO		
Service Delivery Model (s)		
Sick Leave/Late policy		
Worksite behavior		
HIPPA Requirements and processes		
Media		
Referral policy		
Supportive Service		

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REQUIRED PH ELEMENTS- CORRECTIONAL INSTITUTION		
Dress code		
No Hostage Policy		
Issue with participant Issue with Correctional Staff		
Contraband Policy		
Remote communication (internal, external)		
Institutional Behavior/ DOC policy		
Data Reporting (frequency and format)		
Electronics policy including cell phone		
Monthly Performance Reporting		

PARTICIPANT ELEMENTS		
Eligibility		
Documentation		
Intake and Enrollment		
Organization Protocol		
Grievance Policy		
Program Offerings		
Program Protocols		
Program Expectations		
Selective Service		
Disciplinary Action		
Legal Documents		
Virtual Engagement Expectations		
Stipends and Incentives		
Signed Agreement		
Follow-up expectations		
Monthly performance reporting		
Data reporting		

REQUIRED YARP ELEMENTS- COMMUNITY COLLEGE		
Contract/MOU		
College Policies		
Financial Obligations (Grantee vs Participant)		
Participant Engagement and Limitations		
Other CC Policies		
Confidentially Agreement		
Educational Requirements		
Drug and Behavior Policies		
Disciplinary Policies		
Health Requirements		
Media		
Reporting		

SUPPORT PARTNERS		
MOU vs Contracts		
<ul style="list-style-type: none"> • Sub-contractors 		
<ul style="list-style-type: none"> • Support Services 		
<ul style="list-style-type: none"> • Partners 		
Grant Requirements		
Partner Expectations		
Program Elements they Support		
Referral Process		
Data Reporting (DOL Required)		
Regularly Scheduled Meetings (expectations)		
Leadership Council		
Media Criteria		
Reporting (Monthly Performance goal vs actual)		

Appendix B: Policy Manual Change Tracker

Date	Change