Appendix A: Title I Program Specific Requirements and Assurances

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List of Local Workforce Development Areas in the State

Alameda County Workforce Development Board

Anaheim Workforce Development Board

Contra Costa County Workforce Development Board

Foothill Workforce Development Board [Cities of Arcadia; Duarte; Monrovia; Pasadena; Sierra Madre; and South Pasadena.

Fresno County Workforce Development Board - Workforce Connection

Golden Sierra Workforce Development Board [Placer, El Dorado, Alpine]

Humboldt County Workforce Development Board

Imperial County Workforce Development Board

Kern, Inyo, & Mono County Workforce Development Board

Kings County Workforce Development Board

Los Angeles City Workforce Development Board

Los Angeles County Workforce Development Board

Madera County Workforce Assistance Center

Marin County Workforce Development Board

Mendocino County Workforce Development Board

Merced County Workforce Development Board

Monterey County Workforce Development Board

Mother Lode Job Connection [Amador, Calaveras, Mariposa & Tuolumne]

Napa-Lake Workforce Development Board

North Central Counties Consortium [Colusa, Glenn, Sutter, & Yuba Counties]

North Valley Job Training Consortium (NoVa) [San Mateo County and Cities of Cupertino, Los Altos, Milpitas, Mountain View, Palo Alto, San Mateo, Santa Clara & Sunnyvale]

Northern Rural Training & Employment Consortium (NoRTEC) [Butte, Del Norte, Lassen, Modoc, Plumas, Siskiyou, Shasta, Tehama & Trinity Counties]

Oakland Workforce Development Board

Orange County Workforce Development Board

Pacific Gateway Workforce Development Network [Long Beach, Signal Hiill and LA Harbor communities]

Richmond Workforce Development Board

Riverside County Workforce Development Board

Sacramento Employment and Training Agency

San Benito County Workforce Development Board

San Bernardino City Workforce Development Board

San Bernardino County Workforce Development Board

San Diego Workforce Partnership, Inc.

San Francisco Workforce Development Board

San Joaquin County Workforce Development Board

San Luis Obispo County Workforce Development Board

Santa Ana Workforce Development Board

Santa Barbara County Workforce Development Board

Santa Cruz Workforce Development Board

San Jose/Silicon Valley WIN - Work 2 Future

Solano County Workforce Development Board

Sonoma County Workforce Development Board

South Bay Workforce Development Board [Cities of El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Manhattan Beach, Torrance, Carson, Lomita, & Redondo Beach]

Southeast Los Angeles County Workforce Development Board (SELACO) [Cities of Artesia, Bellflower, Cerritos, Downey, Hawaiian Gardens, Lakewood, & Norwalk]

Stanislaus River Valley Alliance

Tulare County Workforce Development Board

Ventura County Workforce Development Board

Verdugo Workforce Development Board [Cities of Burbank, Glendale, and Pasadena)

Yolo County Workforce Development Board

The process used for designating local areas and the process used for identifying region and planning regions

The state's process used for designating local areas is included in Directive WSD 14-10. It includes procedures for determining "performed successfully" and "sustained fiscal integrity" are as follows:

Performed Successfully - a local area has achieved at least 80 percent of their local performance goal on each performance measure for PYs 2012-13 and 2013-14. (A local area is still eligible for initial designation if it achieved at least 80 percent of its local performance goal on seven or more of the performance measures during either PY 2012-13 or PY 2013-14. To remain eligible, the local area must attach a Corrective Action and Technical Assistance Plan (as required in WIA Directive WIAD06-10) to its initial local area designation and initial local board certification application.

A local area is ineligible for initial designation if it did not achieve at least 80 percent of its local performance goal on two or more performance measures during both PY 2012-13 and 2013-14.

Sustained fiscal integrity – the local area has not been found in violation of one or more of the following during PYs 2012-13 or 2013-14:

- Final determination of significant finding(s) from audits, evaluations, or other reviews conducted by state or local governmental agencies or DOL identifying issues of fiscal integrity or misspent funds due to the willful disregard or failure to comply with any WIA requirement, such as failure to grant priority of service or verify participant eligibility.

- Gross Negligence - defined as a conscious and voluntary disregard for the need to use reasonable care, which is likely to cause foreseeable grave injury or harm to persons, property, or both.

- Failure to observe accepted standards of administration. Local areas must have adhered to the applicable uniform administrative requirements set forth in Title 29 CFR Parts 95 and 97, appropriate Office of Management and Budget circulars or rules, WIA regulations, and state guidance. Highlights of these responsibilities include the following: timely reporting of WIA participant and expenditure data, timely completion and submission of the required annual single audit, have not been placed on cash hold for longer than 30 days (in alignment with WIOA Section 106[e][2])

The process used for identifying regions and planning regions is included in Directive WSD 15-XX (awaiting review). Local Board placement in Regional Planning Units is based primarily on economic data, the location of WIOA client populations, the way these populations fit into regional economies, commute patterns between counties, and the geographic distribution of industry sectors.

While the boundaries of the proposed RPUs were largely set by giving weight to the foregoing economic data and by starting with regional economic market boundaries drawn by EDD's LMID, proposed RPU boundaries were modified to take into account the number of local areas in a region, the size of the area covered, and the boundaries and planning regions of existing regional workforce consortia.

In addition to the above, the following principles and other considerations were also applied to initially develop the boundaries of RPUs:

Principles

- Local Boards will only be required to plan in one RPU.
- Local Boards will always plan in the macro-regional economic markets where the majority of their populations are located.
- RPUs respect the existing administrative boundaries of counties and Local Boards.
- Regional planning boundaries provide some deference to existing planning relationships provided that Local Boards plan inside the macro-regional economic market where the majority of their populations reside.
- RPUs carved out of larger regional economic markets correspond, as much as possible, with the boundaries of sub-regional economic markets.

Other Considerations

- RPU boundaries are typically consistent with, or nested inside, the historical economic development area boundaries determined by California's nonoperational Economic Strategy Panel.

- An examination of the location and number of Adult Education providers in the Adult Education consortia was undertaken to ensure that there were a sufficient number of providers in each regional planning unit.

Appeal Process for Designation of Local Workforce Development Areas

Appeal Process for Designation of Local Workforce Development Areas

Section 106(b) of the Workforce Innovation and Opportunity Act (WIOA) requires the Governor to designate local workforce development areas (local area) in the state and describes the evaluation criteria to be used to complete this mandatory activity. In instances where a local area is not granted designation, the chief local elected official or his representative may file an appeal to the State Board. Further, if the appeal does not result in designation the local chief elected official or designated representative may request a review of that determination by the federal Secretary of the Department of Labor.

This Appeal process is described below:

1. The chief local elected official or his/her representative must file a written appeal to the State Board within 15 business days from receipt of a written notification of the decision denying designation. The appeal must include the reasons and grounds for the appeal.

2. The State Board, within 30 business days of receiving an appeal of a Governor's decision to not grant designation to a local area, through its Executive Committee, shall appoint an independent hearing officer to review the appeal materials submitted by the chief local elected official or their designee.

3. The hearing officer will contact the parties no later than 10 business days after being notified of the appointment and will commence a 60 calendar day hearing process to review the appeal materials. The hearing officer also may, in his or her discretion, permit the parties to submit supplemental verbal or written testimony within that 60 day hearing process. Either party may request a hearing in lieu of a record review.

4. The hearing record will close 60 calendar days from the start of the hearing process.

5. Within 10 business days of the close of the hearing record the hearing officer will submit a recommendation to the State Board Chair and the Secretary of the Labor and Workforce Development Agency, at which time the Secretary and Chair will accept, reject, or modify the recommendation.

6. Within 5 business days of the final determination by the Secretary and the Chair, the State Board staff will inform the parties in writing of the final outcome of the appeal and

provide information how the parties may request a review of the decision to the federal Secretary of the Department of Labor.

Appeal process for Infrastructure Funding

In accordance with WIOA, One-Stop partners may appeal the Governor's determination on the portion of funds to be provided for One-Stop infrastructure cost and request a hearing. A written appeal and request for a hearing must be mailed to the State Board within twenty-one calendar days from the Governor's infrastructure cost determination.

The appeal must be in writing and state the grounds for the appeal. The appellant must describe how the Governor's infrastructure cost determination is inconsistent with proportionate share requirements, cost contribution limitations, and/or the cost contribution caps, in accordance with WIOA Notice of Proposed Rulemaking Section 678.750(b).

The appellant will be contacted within ten calendar days of the receipt of the appeal and a hearing date will be scheduled. In order to ensure a prompt resolution of the appeal and distribution of funds in a timely manner, the appellant will receive a written decision no later than fifteen calendar days after the hearing.

State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

Relevant California statutes are detailed in chapter seven and this State Plan serves as a general policy framework for workforce programming in the state.

In general, California uses statewide funds to develop and fund innovative and dynamic initiatives that pilot new service delivery strategies and target specific populations throughout the state. These initiatives are aligned with the mission and direction of WIOA by assisting job seekers, especially job seekers with barriers to employment, with access to employment, education, training, and support services they need to succeed in the labor market while also matching employers with the skilled workers they need to compete in the global economy.

Below is a high level summary of several of some of California's current initiatives:

Service Delivery Initiatives

<u>Workforce Accelerator Fund</u>

The Accelerator Fund awards funds to design, develop, and implement projects that accelerate employment and reemployment strategies for California job seekers. These projects create and prototype innovative strategies that bridge education and workforce gaps for targeted populations, and implement promising models and practices in workforce system service delivery infrastructure.

The Accelerator Fund fosters regional coordination among key partners, sector-based employment strategies, skill attainment though 'earn and learn" and other effective training models, and development of career pathways. Innovations that emerge from the prototypes are scaled and replicated across the state to incorporate new ideas in the workforce development system. These ideas have the potential to substantially increase effectiveness, scale, and/or capacity of existing workforce system programs and funding streams that serve target populations.

Through the Accelerator Fund, California creates ground up solutions to the challenges that keep job seekers with barriers to employment from achieving success in jobs and careers. Key populations targeted by this initiative include: long-term unemployed, returning veterans, individuals with disabilities, low-income workers, CalWORKs participants, disconnected youth, ex-offenders, and parents involved in family reunification systems.

The primary goals of the Accelerator Fund include:

- Improve labor market and skills outcomes for target groups through the development of strategies that fill gaps, accelerate processes, or customize services to ensure greater access to workforce services and employment opportunities.
- Create new models for service delivery and funding alignment that can be replicated across the state and tailored to regional needs.
- Implement, replicate, and/or scale successful innovations that emerged from past statewide fund projects and initiatives.
- Leverage state investments with commitments from industry, labor, public, and community partners.

<u>SlingShot</u>

The SlingShot initiative provides funding to create new strategies that achieve scalable impact. Traditional workforce, education, and economic development strategies do not have sufficient impact in helping enough workers to build needed skills, find good jobs and realize positive economic mobility. SlingShot rises to this challenge and provides a catalyst for workforce innovation and solutions.

SlingShot seeks to seed collaborative efforts by employers and industry, government, workforce and economic development, and education stakeholders within a region to identify and then work to solve employment challenges that slow California's economic engine – with regionally-selected solutions to regionally-defined problems.

SlingShot guiding premise contains five dimensions:

- California is a collection of distinct regional economies; aligning our work at that level will be more effective than either city/county/district level efforts or statewide strategies.
- The workforce systems must accelerate education, employment, and economic development for those Californians in danger of being left out of our state's prosperity.
- California's regions face no shortage of vexing workforce challenges. Slingshot offers an opportunity to take on a tough issue that if solved would meaningfully move the needle on employment.
- All strategies need to be grounded in effective use of data and metrics.
- In an era of perpetual economic volatility, traditional programs don't solve tough workforce challenges. Slingshot encourages regional partnerships to prototype new ideas, based on strong research and development, without fear of "failure" if the effort falls short of expectations. For every impactful practice that emerges, there will be others that are tried and then dropped for lack of sufficient impact.

Population Specific Initiatives

Disability Employment Accelerator

The Disability Employment Accelerator initiative supports local programs that facilitate employment of people with disabilities. The Disability Employment Accelerator engages businesses in high-growth industries and encourages them to develop training and service program for people with disabilities. It also promotes the development of skills so that participants can become competitive, successful and integrated members of the workforce.

Veteran's Employment-Related Assistance Program

The Veteran's Employment-Related Assistance Program awards grants to local entities that have demonstrated highly effective programs that met performance goals in serving veterans. The funds allow awardees to enhance their service-delivery infrastructure and improve partnerships with labor groups, business associations, and regional employers.

Work for Warriors Partnership

In 2012, the California Military Department established the Work for Warriors program. In partnership with the AJCCs, the State Board, and the EDD, the Work for Warriors interagency agreement complements and enhances services to California's veterans. The Work for Warriors program provides funding to reduce the unemployment rate among service members in the California National Guard and Reserve by directly placing them into gainful fulltime employment. The program matches the skill sets of service members, veterans, and their spouses with the needs of civilian employers. Additionally, the program also establishes partnerships with employers who understand hiring veterans is a good business decision.

Employer Engagement Project

The Employer Engagement Project fosters partnership with regional and statewide economic development entities to develop new strategies for employer engagement and methods to coordinate business service strategies. Employers play a vital role in the success of California's workforce. By developing partnerships with California's employers, the California workforce system thrives and creates avenues that promote innovative workforce solutions to match employers with job seekers.

Governor's set aside funding. Rapid Response funds, and layoff aversion strategies

In California, the Governor sets aside the maximum twenty five percent (25%) of the state's Dislocated Worker allocation for the Rapid Response system and Additional Assistance (AA). Rapid Response activities have been delegated to Local Boards the California Labor Federation (CLF), Northern California Indian Development Council (NCIDC) and the Wagner-Peyser agency. The State Board's policy for distributing this Dislocated Worker funding is included in Directive 14-3 and allocates fifty percent (50%) of the funds to develop and implement proactive layoff aversion strategies and/or provide rapid response activities to impacted workers. The balance of this fund is held in reserve to provide AA to Local Boards that do not have sufficient dislocated worker and/or other resources to serve increased numbers of unemployed individuals due to natural disasters, plant closings, mass layoffs or other events. These AA funds are provided to Local Boards based on applications submitted and evaluated by the state and EDD. Directive 14-3 also provides the methodology for allocating these funds and the reporting of activities carried out using these funds.

California's decentralized Rapid Response system is led by staff of the Local Board. These local efforts are supported through four Regional Rapid Response Roundtables (RRRRT) partnerships, which meet on a regular basis to promote best practices, provide a forum for continuing education of the local practitioners and promote regional coordination. The four RRRRTs are comprised of the Local Boards in the regions of Southern California, San Francisco Bay Area, Central Valley and Northern California. This regional approach facilitates a timelier, coordinated response to local business needs and its workers and the State Board the opportunity to communicate directly with the local staff providing these critical business and individual solutions. Partners participating in the RRRRTs include representatives from the State Board; Trade Adjustment Act (TAA); Wagner-Peyser Act; EDD, CLF; NCIDC; Covered California, and DOL Region VI Consolidated Omnibus Budget Reconciliation Act (COBRA) health coverage program.

Over the last two years, the State Board has allocated $8 million in AA funds to assist Local Areas develop and implement a proactive layoff aversion strategy. Directive 14-3 also provides Local Boards the policy framework and guidance as well as a method to document the successful efforts of these layoff aversion strategies. Many Local Areas are working in partnership with the Manufacturing Extension Partnership entities to identify employers that are at risk of layoffs and provide business solutions to help the employer retain those employees, such as the Working Sharing Program that allows payments of unemployment

insurance benefits to employees whose hours and wages have been reduced. This program helps employers avoid some of the burdens that accompany the layoff situation.

The State Board is working with Local Boards and their staff and partner agencies to identify accurate and efficient ways to document these efforts within CalJOBS and develop a Return on Investment calculation that considers such elements as jobs retained; impacted workers returned to the workforce within seven days of layoff, positive impact on the California Unemployment Insurance Fund; the employer's growth (increased sales; new employees, etc.) and the multiplier effect of these jobs being retained.

The State Board works directly with the Regional Rapid Response teams to provide and track labor market trends, increased unemployment insurance claims and public announcements through the Federal and California Worker Adjustment and Retraining Notification Act (WARN) notice systems. The WARN system is maintained by EDD and includes an alert component that quickly notifies the appropriate local elected officials and local Rapid Response team(s) when a California employer files the required WARN notice, so that these teams can respond as quickly as possible to these events. Guidance and instructions on the use of this system is included in EDD Information Notice WSIN 15-9. These local Rapid Response teams are comprised of Local Boards, EDD and when appropriate TAA, CLF and other partner agencies.

State policies and procedures to provide Rapid Responses in cases of natural disasters

In cases of natural disasters, the state's response efforts are coordinated by the California's Office of Emergency Services (CalOES). CalOES coordinates the overall state response to disasters with local, state, federal, and voluntary/nonprofit partners to administer recovery operations in the event of a disaster. California employs Rapid Response funding to conduct initial situation assessment to obtain preliminary data to draft a National Dislocated Worker (NDW) Grant application. The State Board recently implemented a Governor Reserve 25% Emergency Application process. Using the initial Rapid Response assessment data, the State Board in partnership with EDD, works with the affected Local Board(s) to develop an immediate response, providing 'stop gap' funding for mitigation activities pending DOL approval of a NDW Grant.

The state coordinates Rapid Response and 25% AA activities with those funded by National Dislocated Worker Grants that are performed under the auspices of FEMA in order to ensure non-duplication and adherence to maintenance of effort requirements.

Early intervention and TAA

The Federal Regulations of the Trade Adjustment Assistance (TAA) program require coordinating the administration of the TAA program with the WIOA program to ensure trade-affected workers obtain all the benefits and services they are eligible to receive. This federal mandate can be met through WIOA/TAA co-enrollment. The state and federal goal for

WIOA/TAA co-enrollment is 100 percent statewide compliance. The state's 25% AA application requires the identification of TAA fund availability and how these resources will be leveraged with the Governor's 25% AA grant.

In June 2015, the EDD TAA program published TAA/WIOA co-enrollment guidelines, which stipulates TAA/WIOA co-enrollment begins with Rapid Response. The guidance requires WIOA Rapid Response and EDD TAA staff to coordinate Rapid Response efforts to ensure all applicable partners and required Rapid Response materials are available at each Rapid Response session. To assist Local Boards and partners, EDD has established a statewide TAA coordinator position, as well as out-stationed 5 regional TAA coordinators to provide TA to local boards, participate in Rapid Response orientations within their respective region, and assist in the development, coordination and monitoring/reporting of Governor's 25% AA and NDW grant applications. A TAA/WIOA comprehensive Technical Assistance Guide was included in the guidance to ensure Rapid Response staff understand and provide all potential trade affected workers with required TAA program information. The TAA/WIOA guidance is published in Workforce Services Directive WSD 14-15.

The regional TAA coordinators also participate in RRRRTs and the annual statewide RRRT conference to provide program status updates and further develop coordination among WIOA partners and other local and state stakeholders.

Additionally, the EDD's TAA program notifies all workers identified in a TAA petition through a TAA notification letter mailed directly to each worker. Although the notification letter is mailed to workers after they attend a Rapid Response orientation, the letter reinforces to the workers that TAA benefits and others services may be able to assist them in their transition back to the workforce. The letter outlines each benefit and service, clarifies program deadline dates, and provides access information to additional program guidance and job center locations.

Alternative Training Models

The State Plan utilizes Alternative Training Models as a key component of the strategies described in Chapter 3 of this Plan. "Earn and learn" models are also embedded in the three policy objectives of "Fostering demand-driven skills attainment," "Enabling upward mobility for all Californians, "and "Aligning, Coordinating, and Integrating Programs and Services." These Alternative work models will be valuable in serving those with barriers, especially those identified as priority of service populations. Additionally, the State Board, working with the EDD, who administers the Eligible Training Provider List (ETPL) and local ETPL administrators, have revised the ETPL Policies and Procedures, which includes guidance on how to utilize cohort based training to facilitate the delivery of pre-apprenticeship and other skills to enable to participants successful entry into employment and a career pathway.

In addition, the Employment Training Panel has recently taking large strides in their efforts to partner with local workforce development boards to implement new employee training to

provide qualified and skilled new workforce and using incumbent worker training as a means to enable labor retention and ensure workers have access to employer valued training programs to further their careers along the continuum of their career pathways.

Registered Apprenticeship

The incorporation of approved apprenticeships is a key facet and focus of the State Plan. One of the goals discussed in the State Plan is to produce a million "middle skill" industry valued credentials between 2016 and 2026. Apprenticeships will be a key strategy and component in enabling the State to achieve this goal. In initial efforts, the State Board has been working closely with the DIR/DAS and local boards to ensure pre-apprenticeships were conducted in coordination with the DAS approved apprenticeship. To accomplish this, AB 554 (Chapter XX, Statutes of 2015) was the first step in ensuring quality pre-apprenticeship training curriculum was developed jointly between the local boards, the DAS approved apprenticeship and the regional Apprenticeship Coordinating Councils. These steps would more readily ensure the participants' acceptance into an approved apprenticeship program.

Another piece of the above goal is to double the number of people enrolled in apprenticeship programs during the same time period. Consistent with the WIOA provision regarding Training Services, administration of the Eligible Training Provider List (ETPL) and the eligibility of Apprenticeships for inclusion on the ETPL, the State Board has been working the DIR/DAS and the EDD, to ensure all the approved apprenticeship programs are included on the ETPL. The revised ETPL Policy and Procedures are included in WSD XX XXXX (not finalized yet).

In addition, the Governor recently enacted AB 509 (H. Perea Jackson, Chapter 558, Statutes of 2015), which exempts specified pre-apprenticeship programs from state licensing requirements when they meet certain criteria. This provides a more efficient pathway from training into an apprenticeship program.

Grants for youth activities

Local Boards operate as an access point for obtaining high-quality employment and training services. California seeks to invest WIOA youth funds in programs that employ best practices and incorporate concepts of youth development in order to meet the diverse needs of youth and young adults through integrated wrap-around services, with a particular focus on employment and post-secondary outcomes.

Local Boards should select service providers that:

- Employ proven recruitment strategies of effective outreach, engagement, enrollment, and retention of out-of-school youth.

- Demonstrate meaningful partnerships with eligible training providers, institutions of higher education, and employers from in-demand industries
- Offer a continuum of services that allow participants to obtain a GED/High School diploma, enroll into post-secondary education, and obtain employment within their chosen career path.
- Utilize career pathways and sector strategy models with a structured sequence of activities, as well as multiple entry and exit points that provide adequate supportive services.
- Use structured work-based learning, such as paid and unpaid work experiences and career exploration that leads to gainful employment.
- Provide intensive case management and support services to help youth overcome complex barriers, successfully complete the program, and retain employment.

Successful performance is a priority as it helps to measure the effectiveness of a local program. Local Boards are required to use CalJOBS[SM], California's labor exchange and database system, for participant and performance reporting. The selection of youth providers also requires an assessment of the provider's ability to meet participant and performance requirements set forth by the local administrative entity and the state.

Local Boards should assess the provider's:

- Experience managing contracts, performance records, and administrative structure, including records and retention, compliance and monitoring, internal audit procedures, and data management system.
- Ability to meet reporting deadlines.
- Planned performance and ability to track outcomes.
- Frequency of training and technical assistance provided on the performance indicators to ensure compliance with federal and state requirements.

Youth Program elements described in WIOA section 129(c)(2). [1]

Local Boards are not required to provide the fourteen required elements to each youth participant; they have the flexibility to determine what specific services a youth will receive based upon the youth's assessment and service strategy. Local Boards, however, must ensure that all fourteen program elements are available in their Local Area.

Local Boards are directed to competitively procure high quality youth service providers that develop and implement effective youth programs by aligning career pathways, employment, training, education, and supportive services. Aligning strategic partnerships, communication, coordination, and collaboration among employers, educational partners, economic development entities, and service providers is the foundation of the ensuring access to all

[1] Sec. 102(b)(2)(D)(i)(I)

program elements.

The WIOA contains two expenditure requirements related to out-of-school youth (OSY) and work experience. These expenditure mandates require Local Boards to shift policies toward serving OSY and expand the availability and participation of "earn and learn" models through work experience. A large percentage of the state's youth formula funds will be allocated OSY workforce investment activities and work experience expenditure requirements opportunities to engage underserved youth by providing employment and training to obtain employment or enroll in post-secondary education.

75 Percent Expenditure Requirement

WIOA prioritizes out-of-school youth as demonstrated by the minimum seventy-five percent expenditure requirement, therefore it is imperative for Local Areas to shift their local programs to serve OSY. At the time of enactment, several Local Areas in California were at or near the minimum seventy-five percent OSY expenditure requirement. Local Boards are engaged in strategies to increase their OSY expenditures through partnership and leveraged funding to meet the needs of underserved OSY. The availability of youth program element services such as financial literacy, entrepreneurship, work experience, and follow-up serves as a pivot toward self-sufficiency.

Work Experience Expenditure Requirement

The mandated twenty percent minimum work experience requirement aligns with California's ongoing support and utilization of "earn and learn" models such as paid and unpaid work experience, pre-apprenticeship, registered apprenticeship, on-the-job training, and internships where participants can receive concurrent academic and occupational education, job readiness training, and obtain employment skills. Work experience is a necessary investment to build the foundation for career exploration and guidance, continued support for educational attainment, provide opportunities for skills training in in-demand industries, and hopefully results with a good job or enrollment in post-secondary education.

State policy for "requires additional assistance to complete and educational program, or to secure and hold employment"

Local Boards may define "requires additional assistance" to complete an educational program, or to secure and hold employment. Possible definitions/criteria for individuals who require additional assistance include the following:

- Have repeated at least one secondary grade level or are one year over age for grade;
- Have a core grade point average (GPA) of less than 1.5;
- For each year of secondary education, are at least two semester credits behind the rate required to graduate from high school;
- Are emancipated youth;

- Have aged out of foster care;
- Are previous dropouts or have been suspended five or more times or have been expelled;
- Are court/agency referrals mandating school attendance;
- Are deemed at risk of dropping out of school by a school official;
- Have been referred to or are being treated by an agency for a substance abuse related problem;
- Have experienced recent traumatic events, are victims of abuse, or reside in an abusive environment as documented by a school official or other qualified professional;
- Have serious emotional, medical or psychological problems as documented by a qualified professional;
- Have never held a job (applies to older youth);
- Have been fired from a job within the twelve months prior to application (applies to out of school youth); and
- Have never held a full-time job for more than thirteen consecutive weeks (applies to out of school youth).

**This definition is included in Directive WSD15-03 – WIOA Youth Program Requirements: http://www.edd.ca.gov/Jobs_and_Training/pubs/wsd15-03.pdf*

The State's definition of "alternative education".

According to the California Education Code Section 58500, an alternative school is a type of school designed to achieve grade-level (K-12) standards and meet student needs.

Examples of alternative schools include, but are not limited to: continuation, magnet, and charter schools. If the youth participant is attending an alternative school at the time of enrollment, the participant is considered to be in school.

**This definition is included in Directive WSD15-03 – WIOA Youth Program Requirements: http://www.edd.ca.gov/Jobs_and_Training/pubs/wsd15-03.pdf*

The State definition, as defined in law, for not attending school and attending school

There is no definition in state law but a definition was developed by the state using CDE guidelines designed for data purposes for tracking those both in and out of school. The relevant definitions are as follows:

Attending School - An individual is considered to be attending school if the individual is enrolled in secondary or post-secondary school. These include, but are not limited to traditional K-12 public and private, and alternative schools.

Not Attending School - an individual who is not attending a secondary or post-secondary school.

Basic skills deficient definition

As referenced in WIOA, an individual is considered to be basic skills deficient if they are unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society.

Criteria used to determine whether an individual is basic skills deficient includes the following: Lacks a high school diploma or high school equivalency and is not enrolled in secondary education.

- Enrolled in a Title II Adult Education/Literacy program.
- English, reading, writing, or computing skills at an 8.9 or below grade level.
- Determined to be Limited English Skills proficient through staff-documented observations.
- Other objective criteria determined to be appropriate by the Local Area and documented in its required policy

**This definition is included in Draft Directive: WSDD-119 – WIOA Adult Program Priority of Service.*

Waivers: NA

TITLE I-B ASSURANCES

1. The state has implemented a policy to ensure adult program funds provide a priority in the delivery of career and training services to individuals who are low income, public assistance recipients or basic skills deficient;
2. The state has implemented a policy to ensure Local Areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;
3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of Local Board members;
4. The state established written policy and procedures to ensure Local Boards are certified by the Governor every two years in accordance with WIOA section 107(c)(2);
5. The state established a written policy and procedure for how the individuals and entities represented on the State Board help to determine the methods and factors of distribution, and how the state consults with chief elected officials in Local Areas throughout the state in determining the distributions;
6. The state will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);

7. The state distributes adult and youth funds received under WIOA equitably throughout the state, and no Local Area suffers significant shifts in funding from year-to-year during the period covered by this plan;
8. If a state board, department, or agency administers state laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;
9. Priority of Service for covered persons is provided for each of the Title I programs;
10. The state agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report; and
11. The state has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the state will annually monitor Local Areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);