

# **Adult Career Pathways Program Operations Guide**

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## Introduction

This guide is applicable to all programs in the Adult Career Pathways (ACP) division. Much of the direction this guide sets forth are Department of Employment and Economic Development (DEED) Employment and Training division-wide policies or policies set by the Workforce Innovation and Opportunity Act (WIOA.) Links have been provided in this guide for reference. While every effort has been made to provide up-to-date links to applicable or referenced policy in this guide, the locations may change. Please refer to the “[Policy and Guidance](#)” section of the DEED website if a link has been broken or moved.

*Individual grant programs and contracts will have specific requirements unique to them. Please refer to the Request for Proposal (RFP) and/or specific program manual for additional guidance.* The information in this guide may not cover every scenario and situation. Please contact your DEED program staff for guidance as needed.

**Workforce One (WF1) is the required grant and case management system for all ACP programs.** You must utilize Workforce One for all official tracking, performance measures, and outcomes. Any reference in this guide to entering participant data, case notes, and grant data is referring to Workforce One unless stated otherwise. Data not entered in Workforce One will not be counted in official performance measures or in reports to legislators. All data is required to be input into Workforce One within fifteen business days of event date.

The Adult Career Pathways department staff encourage Grantees to read DEED’s Partner Express monthly newsletter for up-to-date information at <https://mn.gov/deed/newscenter/publications/newsletters/> to subscribe.

The most recent copy of this guide can always be located on the [Office of Adult Career Pathways](#) homepage.

DEED reserves the right to make changes to any part of this guide any time, however Grantees will be notified in writing before significant changes are made and take effect.

**\*\* COVID-19 Update:**

The Employment and Training Program Division (ETP) has created a listing of Questions and Answers (Q & A) in relation to the current COVID-19 pandemic. The Q & A’s are intended to guide and assist partners and providers through the crisis. The Q & A’s are broken out by program area and will be updated regularly. If partners and providers require additional information, they are encouraged to directly contact their program coordinators.

Information may be found at: <https://mn.gov/deed/programs-services/etp/>.

## Activity Definitions

Activities are used to record the things a participant is working on to achieve employment, training or other identified outcomes from their Employment Plan/Action Plan. In addition, participants engaged in employment or employment-related activities at the time of enrollment must be captured as an Activity in WF1. Activities entered on the participant record in Workforce One must be in line with the participant plan. The definitions below are general definitions. Grantees should connect with their Grant Coordinator to align the approved work plan with ACP Workforce One activities.

*\*denotes required activities for ACP programs*

Activity	Definition	Notes
ABE/Remedial Training	This activity is to be used for participants accessing Adult Basic Education (ABE) services	Attending an ABE program as a part of their EP
Adult Diploma Program (ADP)	Training to obtain an Adult Diploma Program (ADP)	Attending a ADP program as a part of their EP
Apprenticeship	A combination of on-the-job training and related instruction in which workers learn the practical and theoretical aspects of a skilled occupation	Program must be a federal/state registered program (DOL/DOLI)
Assessment *	Open as the initial enrollment activity when the participant has completed an <a href="#">assessment</a> with program staff and is continually assessed throughout program	<b>ALL</b> – must be on all participant records
Assessment/Testing (MFRP only)	Open when the participant has completed an <a href="#">assessment</a> with program staff and is continually assessed throughout program	
Basic Skills Instruction	This activity is to be used for participants accessing Adult Basic Education (ABE) services which include basic essential and educational skills	
Bridge Training (P2P only)	Open at the time the participant begins a training program that results in a one or more industry recognized credential(s) at the completion of training. Training program must be Minnesota Office of Higher Education compliant	Credentials must be defined within your DEED contract
Career Counseling *	Open at the time the participant and Navigator/Counselor meet one- on-one to develop employment goals. See <a href="#">Case Management</a>	<b>ALL</b> – must be on all participant records
Career/Education Counseling (MFRP only)	Open at the time the participant and Navigator/Counselor meet one- on-one to develop employment goals. See <a href="#">Case Management</a>	<b>ALL</b> – must be on all MFRP participant records
Credentialed Coursework/Training	Open at the time the participant begins a training program that DOES provide an occupational skill credential at the completion of training. Training program must be Minnesota Office of Higher Education compliant	
Customized Cultural Program	Open for a training program that is culturally specific	

Employed Full-Time	Full-time job placement that occurs during or after completion of the program; <a href="#">See Retention</a> Open when participant enters the program employed full-time	32 hours or more per week
Employed Part-Time	Part-time job placement that occurs during or after completion of the program; <a href="#">See Retention</a> Open when participant enters the program employed part-time	Less than 32 hours per week
ESL/ELL Training	Open when participant is provided training in English as a Second Language (ESL)/English Language Learner (ELL)	Attending an ESL/ELL program as a part of their EP
Financial Literacy Education	Open when participant is provided training to develop skills for making informed decisions about personal finances	
GED Training	Open when participant is provided training to obtain a General Educational Development diploma (GED)	Attending a GED program as a part of their EP
Holding	Use for participant who are temporarily unable to actively participate in the program but intend to return within 90 days.	
Individual Plan Development (IPD) *	Open when creating a participant plan to bridge the gap between an individual's skills and his/her goals. See <a href="#">Employment Plan (EP)/Individual Service Strategy (ISS)/Action Plan/Individual Plan Development (IPD)</a>	<b>ALL</b> – must be on all participant records
Individual Training Pathway (P2P only)	Open to indicate a credential or post-secondary credit will be attained at the completion of training. Training program must be Minnesota Office of Higher Education compliant	
Job Club (MFRP only)	Use for participant who is actively seeking employment and are actively participating in supervised job search sessions	
Job Search	Use for participant who is actively seeking employment through submission of applications and interviewing	
Life Skills Development (MFRP only)	Use for participant who is actively attending life skills development sessions/classes	<b>ALL</b> – must be on all MFRP participant records
Local Flag	Use as a placeholder for participants being enrolled using <i>alternative documents</i> to verify social security number. See <a href="#">Eligibility (Participant)</a>	
Non-Credentialed Training	Use for training programs that DO NOT provide an occupational skill credential at the completion of training Non-Credentialed Training enhances employability but does not in itself result in a credential.	
OJT - Public or Private	On the Job Training, (OJT) is a work placement made through a contract with an employer in the public, private non-profit, or private sector. An OJT contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is being provided. The OJT Service Provider provides the Employer with a partial wage reimbursement, typically up to 50 percent of the wage rate of	

	the participant for the extraordinary costs of providing the training and supervision related to the training. See <a href="#">Work Experience</a>	
On-Ramp Training	Use for participant enrolled in Pathways to Prosperity (P2P) On-Ramp program to indicate a certificate will be attained at the completion of training	
Orientation	Use at the time participant attends group orientation sessions for enrollment into the program	
Paid Work Experience	Use when a participant is in a temporary paid employment experience in the public, private nonprofit, or private sector	
Partnering (MFRP only)	Use when a participant is receiving related services from a partnering program/provider	
Personal Counseling (MFRP only)	Use for participant who is actively attending personal counseling sessions/classes	
Pre-Employment Preparation (MFRP only)	Use for participant who is actively attending pre-employment preparation sessions/classes	<b>ALL</b> – must be on all MFRP participant records
Referral/Invite (MFRP only)	Use when a participant has been referred to an outside program or services	
Remedial Education (MFRP only)	Use for participant who is actively attending remedial education sessions/classes	
Retention	Use to keep the program sequence open after participant has gained employment in order to provide continued support in the first 90 days on the job. This could include career counseling, support services, or other necessary resources to assist the participant in maintaining employment	
Self-Employment (MFRP only)	Self-Employment job placement that occurs during or at the completion of the program	
Self-Employment Training	Activity that improves the employability of participants by providing training in setting up and operating a small business or other self-employment venture	
Uncompensated Work Experience	Use when a participant is in a temporary unpaid employment experience in the public, private nonprofit, or private sector	
Work Readiness Skills Training	Use when a participant is in training that includes job seeking skills, interview skills, soft skills, and other pre-employment trainings provided	



## Amendments to Contracts

See [Modifications to Contracts](#)

## Applications

Participants must complete a signed, dated application for all Adult Career Pathways (ACP) programs. This must be kept in the participant file. The application must contain the answers to the [eligibility](#) criteria outlined for the ACP program which the participant is enrolled in. Some organizations may choose to implement a universal application across all the programs they administer. Please ensure that universal application contains the minimum criteria for the ACP program, in which the participant will be enrolled.

Participants enrolled in an ACP Program do not require a new application from year-to-year if the enrollment is continuous without a gap in services (dates) and the exit reason indicates “Program/Type Transfer” the initial application is still valid.

## Assessments

For the purpose of work force development, there are two types of assessments: objective assessments and academic/grade level assessments. All participants in workforce development programs must have an objective assessment. Most, but not all, participants in Adult Career Pathways programs must also have an academic assessment.

Whether the grantee conducts only an objective assessment or both an objective and an academic/grade level assessment, the results should be a key factor in guiding a participant’s Employment Plan (EP) and service strategy.

Grantees must include the official assessment results in the participant’s file. Grantees may select one assessment to use for all participants, or they may use a variety of different assessments, choosing the assessment best suited to the participants’ career/training goals, or other circumstances or characteristics specific to a participant.

### Objective Assessments

All participants must receive a comprehensive assessment. Some examples are:

- A skills gap assessment performed by a Career Navigator;
- An informal or standardized skills and interest assessment to appropriately gauge participant career paths.

The objective assessment must be performed at the time of enrollment.

### Academic/Grade Level Assessments

A reading and math assessment is required for participants prior to starting any certificate, credential, or post- secondary training. Participants with an Associate Degree/2-year post-secondary degree or above are exempt from this requirement (self-attested at the time of enrollment).

Regardless of academic/grade level assessment, grantees are responsible for ensuring that participants are academically prepared to be successful in their training program.

Acceptable reading and math assessments include:

- Standardized academic assessments that meet the guidelines of the Minnesota Department of Education (MDE) – Adult Basic Education (ABE) Office or the Minnesota State College and University (MnSCU/MinnState) System. Currently, these include:
  - The Comprehensive Adult Student Assessment System (CASAS) for English Language Learners and ABE students.
  - The Test of Adult Basic Education (TABE) for ABE students.
  - Wonderlic GAIN (General Assessment of Instructional Need)
  - The use of the Accuplacer and the ESL Accuplacer for course placement.
- Tests listed on the Federal Register as approved for use in the National Reporting System.
  - This list may be updated regularly, scores will be accepted if the test was listed on the register at the time of administration.
- Any other official assessment that translates math and reading scores to a grade level may be used with review and written prior approval by DEED.

An official communication from Adult Basic Education (ABE) or a college that has assessed participant's math and readings skills within the last year is also acceptable proof of assessment. The email or letter must clearly identify the ABE or school as the sender, and include:

- the date the assessment was administered,
- the participant's name, and
- the grade equivalent.

**DEED grantees that are accredited institutions of higher learning must follow their written institutional assessment policy.** If a DEED grantee partners with an accredited institution, they must test participants prior to referral to the accredited institution. Grantee assessment policies must be available to DEED upon request.

After conducting the assessment, a Grantee must:

- Enter the scores, in the form of a grade-level equivalents, in WF1 under *Assessment - Reading/Math Test*, 0-12 = the actual grade level equivalent
- Retain a copy of the test results (dated and scored with grade level equivalencies) with the participant's name or identifying number (such as the WF1 number) in the participant's file.

### **Workforce One**

As a reminder, for proper coding in Workforce One, enter the grade level determined by the assessment for both reading and math. Select Yes/No if a test has been administered. If No is selected, a reason must be selected from the drop down; Attained Associate Degree or Higher, Refused to Test, Test Waived due to Documented Disability. If a participant refuses to take an academic assessment prior to entering a credentialed training activity, select the *Refused to Test* option within the Assessment – Reading/Math test section of Workforce One. A participant cannot be refused services; however, the DEED funded program cannot reimburse for costs related to credentialed training.

If Yes is selected, enter the Administered Date and Math Skills Grade Level and Reading Skills Grade Level (0-12) the actual grade level equivalent.

See [Consent for Release and Exchange of Information](#).

## Bidding Requirements

Grantees are subject to bidding requirements for goods and services purchased under ACP grants. Goods and services that cost:

- \$100,000 or more must undergo a formal notice and bidding process.
- Between \$25,000 and \$99,999 must be competitively awarded based on a minimum of three (3) verbal quotes or bids.
- Between \$10,000 and \$24,999 must be competitively awarded based on a minimum of two (2) verbal quotes or bids or awarded to a targeted vendor.

The grantee must take all necessary affirmative steps to assure that targeted vendors from businesses with active certifications through these entities are used when possible:

- [Certified Targeted Group, Economically Disadvantaged and Veteran-Owned Vendor List](#) – State Department of Administration
- [Disadvantaged Business Enterprise Directory](#) – Minnesota Unified Certification Program
- [CERT Business List](#) – Central Certification Program

The grantee must maintain:

- Written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.
- Support documentation of the purchasing and/or bidding process utilized to contract services in their financial records, including support documentation justifying a single/sole source bid, if applicable.

The grantee must not contract with vendors who are suspended or debarred in MN listed [here](#).

The State may waive bidding process requirements for competitive grant(s) when:

- Vendors included in response to competitive grant request for proposal process were approved and incorporated as an approved work plan for the grant.
- It is determined there is only one legitimate or practical source for such materials or services and that grantee has established a fair and reasonable price. Must maintain written justification and receive approval from ACP Coordinator prior to costs being incurred.

## Billing DEED

Training, support services, and individualized services (one-on-one) cannot be incurred, obligated, distributed or billed to DEED until after the participant is enrolled AND the participant and Career Navigator have both signed and dated the [Employment Plan](#) (EP).

See [Payment Request](#)

## Case Management

Adult Career Pathways programs require service providers to complete and maintain regular ongoing communication with each program participant and document their progress using case notes. Workforce development programs are designed around a case management approach, and case notes are an essential component of effective case management practices. Essential components of effective case management practices include:

- Assessment; Objective and Comprehensive
- Participant contact; *Live* contact at least once every 30 days - In-person (individual or personal engagement within a group), text, chat, individual social media, telephone, voice message, electronic message, or postal mail update from the participant
- Case notes: within 15 business days of contact and must record details of the customer's participation in all activities
- Activity documentation; documenting a participant's progress towards goals and through the Grantee's training program

See [Case Notes](#)

**To demonstrate on-going case management and progress, service providers *must* enter activities and case notes into Workforce One (WF1).** If no engagement from the participant in 90 days, the participant must be terminated/exited from the program and the Workforce One case management system.

## File Management

Participant files and documents may be maintained as a paper file or electronically utilizing a secure system and made readily available to DEED Monitors/Grant Coordinators upon request to ensure compliance with applicable Federal, state, local, and Office of Grant Management Policies.

Effective July 1, 2025, all Local state and federal Employment and Training Program Partners must transition from paper (hard) copy participant files to maintaining electronic participant records using Workforce One (WF1), which includes the upload of all required participant source documentation (including all participant eligibility documents, employment plans, and support services documentation) and program required into Electronic Document Storage (EDS) also known as Document Summary within WF1.

## Case Notes

Case notes must provide a complete, accurate, and concise explanation of frequency and type of contact with participants, as well as services provided, and the outcomes associated with those services. Case notes must be written so that the reader has all background information for the participant, as well as the purpose of meetings, and the where, why, and how contact took place. Case notes must be entered at minimum, once every 30 days.

Case notes must record details of the customer's participation in all activities, including:

- Date and manner of the contact – In-person (individual or personal engagement within a group), text, chat, individual social media, telephone, voice message, electronic message, or postal mail update from the participant.
- Enrollment/Preliminary/Intake case note. The required enrollment/preliminary/intake case note must

include:

- **Participant current situation:** including skills, barriers to gaining employment (i.e., lack of certification/training, unstable housing, dependent care, transportation), education history, work history, current work situation (employer name, title, wage, number of hours worked per week), family status, justification for enrollment.  
If you select Yes for “Lack of Significant Work History” at enrollment, please explain.
- **Participant goals:** including goals from EP, steps participant will work towards to achieve those goals, and how training program will assist in meeting those goals.
- **Support Services and/or Referrals** that program will provide to participants to assist in achieving employment goals.

A new enrollment/preliminary/intake case note must be developed for each new Grant/Program Year. The only exception to this rule is a Program Type/Transfer from one grant/program year to another without a gap (for any length of time) in services. Consecutive program year grant; example SFY 2022 and SFY 2023.

- Life events that may impact the customer's participation, i.e., changes in health (illness), family status, incarceration, housing situation, etc.
- [Employment Plan/Individual Service Strategy](#) activities and progress toward goals, including updates and changes in this living document.
- Information provided verbally by other service providers (for example, training provider, social worker) about the customer's participation or progress.
- Purpose of the contact, information provided, support services provided, and description of outcomes.
- Activities during the contact.
- Pertinent information provided verbally by the customer.
- Outcomes of the contact - actions taken, decisions made, and assignments of tasks for next steps.
- Information on contacts with other program staff.
- Exit detail reason/summary [Exit Reason Definitions](#).
  - If employed upon exit please include Labor Force Status, Employer, Hourly Wage, Hours per Week, Title, and Start Date information in the case note.

Case notes within WF1 should be limited to information pertinent to the program in which the participant is enrolled. While health (physical/mental) related and sensitive information may be relevant to a participant’s progress, WF1 case notes regarding health (including COVID-19 vaccine status, testing and/or results) should be limited. Service Providers must always follow DEED’s [Case Management Privacy](#) requirements.

Additional information for MFRP providers only:

- Case Noting
  - [Preliminary case notes](#) must be as descriptive as possible when participants first enroll in the program and when a participant’s case is being extended beyond 1-year.
  - [Ongoing Case notes](#) must be entered within 15 business days after live participant contact has been made and at least once every 60 days. Be as descriptive as possible, limiting private information/data that may compromise a participant’s situation. Minimal-wording, or mass case noting is not acceptable as it does not indicate live participant engagement

See [Co-Enrollments](#).

See [Privacy Information](#).

## Co-Enrollments

This policy applies to the Office of Adult Career Pathway Programs. These include, DEED SNAP E&T 50% Reimbursement, MN Family Resiliency Partnership (MFRP), Adult Appropriations and Competitive Grants<sup>1</sup>

DEED encourages the use of braided funding (using leveraged funds or co-enrolling participants in multiple programs), when needed, to seamlessly meet the needs of participants and enhance a participant's career goals. Eligibility criteria and available resources in each program governs co-enrollment.

When co-enrolling, always consider the following:

- What can one program do that the other program cannot?
- Participant meets all the eligibility requirements of ALL programs, and
- Enrollments are necessary and reasonable.
- Co-enrollments must not be inconsistent, i.e., a participant enrolled in a CNA training and a Manufacturing training.

### Allowable Co-Enrollments

- Within a COFFR (agency) Co-enrollment within the same agency occurs between Funding Streams. For example, A participant can be co-enrolled in one(1) P2P program and Adult Support Services. For this co-enrollment, open a New Application
- Between different COFFRs (organizations): Co-enrollment between agencies occurs between Funding Streams. For example, A participant can be co-enrolled in the Southeast Asian Economic Disparities Relief (SEA) and in one(1) P2P program.

### Unallowable Co-Enrollments

These co-enrollments are always unallowable, within and between agencies.

- Pay-for-Performance (P4P) with any program.
- Pathways to Prosperity (P2P) with any (P2P)
- Drive for Five with any P2P

**Note:** DEED monitors co-enrollments. The Grantee is responsible to take steps to prevent duplication of services. A Grantee must communicate and collaborate with other grant programs in which a participant is co-enrolled, to monitor support services and other services provided to the participant.

Each co-enrollment must be specifically addressed and documented on the Employment Plan (EP) and in Workforce One (WF1) Case Notes. The case note must explain why a participant needs to be co-enrolled and/or needs ACP services from more than one program.

### Some examples for Adult Career Programs (ACP) include:

- Grant A is a pre-employment program grant with no or limited training funds. Grant B provides training. Co-enroll the participant in grant B to access training funds.

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<sup>1</sup> Competitive Grants include; Pathways to Prosperity (P2P), Adult Support Services, Women's Economic Security Act (WESA), Southeast Asian Economic Disparities Relief (SEA), MN Tech Training Pilot Project and Drive for Five. \*\*Competitive Grants are subject to change with grant cycles.

- Grant C is paying for participant training. The participant needs a gas card. Grant C has no Support Service funds. Co-enroll the participant in grant D to access Support Service funds.
- Grant E is paying to send the participant through basic welding training. Grant F is paying to prepare the participant for CNA testing. In most cases this would not be a reasonable co-enrollment. A participant generally would choose one career path to pursue.

**Consult with your DEED program staff to discuss any participants with co-enrollments if you have questions.**

### **Workforce One**

To capture co-enrollments within Workforce One, Grantees with multiple ACP programs must co-enroll a person in a new program sequence. To open a second program sequence, complete a new application, determine eligibility, and complete enrollment.

When multiple funding streams are opened under activities, not program sequences to indicate co-enrollments, performance outcomes will not be captured.

Workforce One added a new field which allows Grantees to capture why a participant is being co-enrolled in a Direct Appropriation program. The field will require the entry to choose the appropriate service the participant is seeking through this co-enrollment.

- GED Training/Testing
- Navigation Services
- Retention Services
- Support Services
- Training Support

Activities must reflect the specific services a participant is receiving in each respective program. Employment and Training Activities opened for participants who are co-enrolled should not be duplicative.

### **Consent for Release and Exchange of Information**

All participant data is confidential. When working with other providers, educational institutions, training partners, participant family members, etc., you must obtain a signed release of information from the participant before discussing or providing participant information; this includes partner organizations.

Service providers must obtain a signed and completed "[Credentialed Training Consent for Release and Exchange of Information](#)" form from all participants pursuing credentialed training before disbursing training funds. This step will help providers report and measure their credential attainment measure.

To download a copy of this form, click on [Credentialed Training Consent for Release and Exchange of Information](#), scroll to and open "Consent for Release/Exchange of Information."

See [Credentialed Training Consent for Release and Exchange of Information](#)

*This is a policy that is part of DEED Administration and applies to all Employment and Training programs.*

A participant's consent to the Credentialed Training Consent for Release of Information form (hereafter referred to as the "release form") must be documented in writing. Please note that this form is only required for participants who are undertaking credentialed training. Participants may provide the

following documentation to show their consent on a release form:

- a signed hard copy of the release form, returning by mail, email, text, or fax
- signing the release form electronically and returning by email.

## Cost Category Guidance

To determine how to charge against the correct cost category, click on the link below:

- [Adult Career Pathways Cost Category Guidance](#)

Organizations cannot invoice DEED for funds spent on:

- Bonuses/incentives/gifts paid to or presented to staff/participants, unless pre-approved in your contract with DEED.
- Bonuses/incentives/gifts paid to or presented to current/new staff for referral or retention of new hires.
- Relocation fees incurred by or for a current/new staff.

## Credential Type

Definitions:

- GED, High School Diploma
- Occupational Skills Certificate – Career and Technical Education educational certificates, examples OSHA 10, First Aid/CPR
- Technical/Occupational Skills Licenses – specific industry training to obtain a licensure, examples CNA, CDL
- Certificate of Completion of ESL/ELL
- Certificate of Completion of an Apprenticeship
- AA/AS degree, BA/BS degree, Master’s Degree, Doctorate degree
- Other Recognized credential – industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

Pathways to Prosperity Specific Definitions:

- On-Ramp Certificate – entry level training ending with a certificate of completion or occupational skills certificate. These types of certificates may or may not be sufficient to qualify for entry level employment.
  - On-Ramp training certificates may include the following but not limited to: Northstar Digital Literacy certificate, OSHA 10, First Aid/CPR certificate, forklift certificate, etc.
- Bridge Credential – using the same definitions as above, these could be either specific industry training to obtain a licensure OR industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.
- Post Secondary Credit Certificate (ITP use only) – degree, diploma, or certificate from an accredited post-secondary institution.
  - Individualized Training Pathways – The degree, diploma, or certificate must be a minimum of 12 credits or a minimum of 100 combined classroom, clinical, and/or lab hours for non-credit programs from an accredited post-secondary institution.
  - All programs offering post-secondary credits must be transferrable to a 4-year institution.

Some of the language/definitions above were adopted from the requirements DEED’s federal programs use:



## [Understanding Postsecondary Credentials in the Public Workforce System](#)

[Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\) Core Programs](#) (starting on page 14).

### Data Entry and Timeliness

All enrollments, case notes, and activities must be entered into Workforce One within 15 business days of the date of occurrence. Best practice is to enter information into Workforce One daily.

### Electronic Signature

Acceptable electronic signature methods include:

- A typed name on an electronic form/document along with an email attesting to the typed signature
- An image of a handwritten signature on an email
- Clicking “agree” or “disagree” on an electronic “terms and agreements” contract
- A handwritten but digitally captured signature made on a touch device, such as a tablet or smartphone (sometimes referred to as a “dynamic signature”)
- A digital signature gathered by an eSign application like Adobe Sign.

### Eligibility (Participant)

Eligibility is determined by relevant legislation and targeted population as defined in the approved work plan. Competitive grants also need to comply with eligibility requirements as outlined in the corresponding Request for Proposal (RFP).

For ACP programs eligibility requirements, click on the link below, scroll to and open “Documentation Needed to Support Participant Eligibility”:

- Eligibility: [ACP Documentation Needed to Support Participant Eligibility](#)

Secondary/High School students: Regardless of participant age at time of enrollment, secondary/high school students are ineligible for Adult Career Pathways programs *unless specifically stated otherwise* in the program Request for Proposal. ABE/GED students are eligible as long as they meet the Minnesota Department of Education requirements for enrollment in ABE/GED services.

All participants must be residents of the State of Minnesota. See [Residency](#), this document.

200% annual income guidelines refer to the Federal Poverty Guidelines based on family size and total family income. Income that is included are wages and any income on which taxes are paid or should be paid on. Unemployment insurance benefits may be excluded from income calculation. Grantees may disregard a temporary increase in participant income. For example, stimulus payments or hazard pay.

Participants must submit verification of their Social Security number for program eligibility. If the participant uses a Social Security Card (without restrictions) to verify the Social Security number, no further verification/action is required. To reduce administrative burden and barriers to enrollment, alternative documents may be provided as an option to satisfy the verification of the participant’s social security number. Refer to ACP Documentation Needed to Support Participant Eligibility for the list of approved alternative

documents.

### I-9 Employment Eligibility Verification (USCIS Form I-9)

For participants being enrolled using *alternative documents* to verify social security number, Grantees MUST work with the participant to satisfy [\(USCIS Form I-9\) Employment Eligibility Verification](#) and include:

- the following Short-Term Objective: “Acquire I-9 Documentation” with the participant’s Employment Plan (EP). The completion date of this objective must be within 90 days of the enrollment date.
- recording the need to obtain [I-9 documentation](#) by [date] and all efforts made to obtain the documentation within participant’s WF1 case notes.
- opening the activity “Local Flag” in WF1

If Documentation is Acquired within 90 days	If at any time the participant refuses to obtain <a href="#">I-9 documentation</a>	If Documentation is <u>Not</u> Acquired by Day 91 and if participant is waiting for documents:
1. In WF1, close Local Flag. 2. Update EP. 3. Update case notes.	1. STOP providing services. 2. In WF1, close Local Flag. 3. Update case notes. 4. Follow Exit procedures. Exit participant “Refused to Continue.”	1. Reach out to Grant Coordinator for possible extension. 2. Update EP. 3. Update case notes.

### Income calculation for FPG

The total income is based on the tax household. For example, the participant has children and a spouse that they all file taxes together. Then the tax household would be participant, spouse, and child which is a household of 3 and then compare a household of 3 on the 200% FPG table.

Income that is included are wages and any income on which taxes are paid or should be paid on. Unemployment insurance benefits may be excluded from income calculation. Participants may disregard a temporary increase in participant income. For example, stimulus payments or hazard pay.

To calculate the annual household income, use the average monthly gross income received for the six months immediately before entering the program and multiply by 12 to get an annual gross income. Using this total, refer to Workforce One>References>Income Guidelines>Health & Human Services (federal) Poverty Guidelines or print the income table from <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines> for 200% FPG. Example Participant wages include:

January	\$100
February	\$150
March	\$150
April	\$200
May	\$0
June	\$0

Total 6-month income = \$600
------------------------------

Average monthly gross income -  $\$600/6$  months =  $\$100$

Annual gross income = average monthly gross income multiplied by 12 months =  $\$100 * 12 = \$1,200$

Using  $\$1,200$ , refer to the FPG table based on the family size.

To calculate the annual household income for **MFRP providers ONLY**, use the total income received for the previous 12 weeks, divide by 4.3 and then multiply by 12.

#### **Ex-Offender/Justice Impacted:**

See [Ex-Offender/Justice Impacted](#)

We will accept a “Face Page,” an official documentation from a County, State, or Federal Corrections facility as a “placeholder” to confirm the following eligibility elements. The participant’s:

- legal name
- date of birth

#### **Workforce One**

An updated guideline to determine if a participant is at or below 200% Federal Poverty Guidelines is available within WF1 under “References,” “Income Guidelines.” Please note that the guidelines are adjusted each year and need to correspond to the year of enrollment.

If selecting  $\leq 200\%$  FPG at enrollment, Annual Family Income field must be completed in WF1’s enrollment page.

#### **Employment Verification effective 7/1/2021**

A participant must submit verification of employment prior to exiting the participant’s record in WF1 with the *Entered Unsubsidized Employment* reason. Verifications must be in the participant’s file and/or uploaded in to WF1 EDS (required for [pay-for-performance](#)).

- Pay-For-Performance contracts: verification must be in writing and be provided by the employer (i.e. pay stub, offer letter, completed employment verification form or another verifiable document from the employer).

All other ACP contracts: verifications must be in writing and may be provided by the employer (i.e. pay stub, offer letter, completed employment verification form or another verifiable document from the employer) or completed [ACP Employment Verification Form](#). Self-employed participants must complete the [ACP Employment Verification Form](#).

#### **Enrollment/Re-Enrollment**

Participants must be enrolled in WF1 to be considered for training outcomes and invoicing. Participants enrolled in training must 1) benefit from the training and 2) be qualified to undertake and complete such

training.

When a participant fails to satisfactorily complete a portion/quarter/semester of training. This means the participant has been unsuccessful in fulfilling the agreed-upon goals/objectives within the EP. Recognizing possible extenuating circumstances, ACP can grant a one-time leniency in certain circumstances where the training institution, provider, or Navigator has determined the participant:

- Has failed to maintain a satisfactory grade of a "C" or equivalent; or
- Has failed to meet or maintain the minimum program requirements and
- Becomes aware that a situation beyond their control is forthcoming and will impact their ability to maintain satisfactory progress within the training.

In order to take advantage of this allowance, a participant in such a situation must contact the ACP Navigator as soon as the participant becomes aware of the situation. The participant will need to explain to the Navigator the reason(s) why they failed or will fail to meet the minimum program requirements and/or the grades were low.

Possible extenuating circumstances can include health problems, and family or financial situations. Based on this conversation, as well as other appropriate factors, the counselor will determine whether the participant can succeed in the training program if permitted to continue or re-enroll at a later date. The participant situation must be well-documented in the participant file and [WF1 case notes](#).

### **Electronic Onboarding**

Participants may be enrolled electronically. Follow the steps below:

- Required eligibility and enrollment documentation (must be legible) from the applicant may be:
  - uploaded utilizing Workforce One Connect app (preferred)
  - photocopied and sent through the mail,
  - photocopied, scanned, and sent via email,
  - photographed using a cell phone and emailed/sent via text, or
  - [signed electronically](#) and returned via email/text/mail.
- Conduct an objective assessment of the applicant by phone, identifying elements for the Employment Plan (EP).
- Draft an EP and mail (2 copies) or email the EP to the applicant.
- Confirm the applicant's agreement to the EP. The applicant may confirm agreement with the EP by:
  - signing a hard copy of the Employment Plan (EP) and returning the signed EP by mail or email
  - signing the EP electronically and returning by email
  - sending an email confirming agreement and attaching the EP
  - using a Workforce One online EP, signing, and sending through the Workforce One system.
  - "Activate" the EP in Workforce One, by entering the date it was signed.
- Enter a detailed case note of the onboarding process in WF1.
- Copy/paste any email interaction into case notes.
- Upload any pictures, or scanned emails (e.g., for the SS card or DL) to WF1 Electronic Document (EDS) as "attachments" to the client record and/or retain paper copies of all pictures or scanned emails.

### **Workforce One – Direct Appropriation**

When enrolling a participant into a Direct Appropriation program/grant, an additional field must be selected to justify the participant’s enrollment. The selection is based on the agency’s Direct Appropriation work plan, outcomes, and the goal of the agency’s Direct Appropriation contract. If the work plan/contract addresses more than one of the following selections, choose the option that best fits the participant at the time of enrollment.

- **GED Training/Testing:** Choose if the Direct Appropriation funds will be used to support a participant to train for and obtain a GED.
- **Navigations Services:** Choose if the Direct Appropriation funds will be used to pay for a person/staff member to support program participants through one-on-one sessions, in-class guidance, development of EP/goals, and otherwise provide guidance to ensure the participant is successful in training and obtaining employment.
- **Retention Services:** Choose if the Direct Appropriation funds will be used to pay for services that will support a participant, prior to exit, to maintain employment or maintain enrollment in post-secondary school.
- **Support Services:** Choose if the Direct Appropriation funds will be used to pay for bus/gas cards, work clothing, housing, car repairs, etc. that will support a participant to maintain attendance and successful completion of the training program; help to remove barriers to being successful in the training.
- **Training Support:** Choose if the Direct Appropriation funds will be used to pay for tuition, training costs/fees, work experience, etc.

### Workforce One Enrollment Information

When enrolling a participant into an ACP program in WF1 each field may be defined by choosing the “Help” option on the top navigation pane of WF1.

- **Annual Family Income** – Enter the annual household income using the table to calculate in [Eligibility section](#) or \$0 if there has been no income in the last six months.
- **Labor Force Status** – if you enter “Unemployed” then you will NOT need to enter an hourly wage of current job. If you enter any of the other employed statuses, then you will be required to enter an hourly wage of current job.  
*If choosing “Unemployed, not seeking employment” participant is not eligible for enrollment in to Adult Career Pathways programs.*

### Equal Opportunity Policy

<https://apps.deed.state.mn.us/ddp/PolicyList.aspx>

DEED is committed to Equal Opportunity and Equity for all participants. Grantees are required to comply with all federal, state and local EEO requirements. For forms, see [Data Privacy](#).

### Exits

**\*\*All participants must be exited or program type/transfer within 30 days of grant close/end date\*\***

See [Attachment 1](#).

Participants must Exit when they complete the program objective(s) or when there has been no

engagement for 90 days. Choose the exit reason in Workforce One that most closely reflects the participants' circumstance.

**Workforce One will automatically close a case using the exit reason "Soft Termination" that has no open activities for 90 days.**

**Exit Reason Definitions**

<b>Exit Reason</b>	<b>Explanation</b>
ABE/Remedial Education (MFRP only)	The participant is enrolled in an ABE program and no longer requires employment services
Attained Pre-Employment Skills (MFRP only)	The participant has completed requirements of pre-employment skills training and no longer requires employment services
Cannot Locate	The participant has not responded to requests for contact for 90 days (or less, depending on local policy)
Certificate Program (MFRP only)	The participant is enrolled in a certificate program and no longer requires employment services
Completed Family or EDP Objectives (MFRP only)	The participant has completed family goals of EDP and no longer requires employment services
Completed Program Objective	The participant completed training and earned the corresponding certificate/credential/licensure, pre-employment skills, or other work plan objectives though has not entered employment prior to exit
Continued Education (MFRP only)	The participant is enrolled in an education program and no longer requires employment services
Death	The participant has passed away
Degree Program (MFRP only)	The participant is enrolled in a degree program and no longer requires employment services
Developing Life Skills (MFRP only)	The participant has completed the goal of developing life skills and no longer requires employment services
Employment (MFRP only) *	The participant has entered new employment or has received a promotion or increase in wage as a result of training and is no longer in need of program support.  Do not use this exit reason when a participant retains the same employment, position, or wage that was held at time of enrollment
Entered Armed Forces	The participant has enlisted in any branch of the military
Entered Registered Apprenticeship	The participant has entered a formalized, registered apprenticeship program.

Entered Unsubsidized Employment*	The participant has entered new employment or has received a promotion or increase in wage as a result of training and is no longer in need of program support.  Do not use this exit reason when a participant retains the same employment, position, or wage that was held at time of enrollment
Family Care Problems	The participant is unable to continue due to a family need not related to their own personal/medical problems
Family Rebuilding (MFRP only)	The participant has completed the goal of rebuilding family and no longer requires employment services
Found Ineligible	The participant has not met the minimum eligibility requirements and must be exited. If this exit reason is used, all charges related to the participant's services must be backed out.
Institutionalized	The participant is no longer able to participate in the program due to incarceration in a correctional facility or becoming a resident of an institution which is providing 24-hour support such as a hospital or treatment center for more than 90 days
Moved from area	The participant is unable to continue due to moving from the service area
Other (MFRP only)	The participant's exit reason does not match with any of the other reasons listed
Other termination	The participant's exit reason does not match with any of the other reasons listed
Pay for Performance Placement (P4P and Drive for Five programs only)	The participant has exited to unsubsidized employment and the employment placement is being claimed by the program as a <a href="#">pay-for-performance</a> placement payment or Job Quality Incentive placement AND retention.
Personal/medical problem	The participant has their own personal or medical issue preventing them from continuing in the program for more than 90 days
Program/Type transfer	The grant/funding stream has ended, but the participant will continue receiving services through another funding stream/program within the same organization
Refused to Continue	The participant is no longer interested in services offered and did not complete program objectives
Remained in School	The participant is enrolled in an education program and no longer requires employment services
Reservist Called to Active Duty	The participant is a member of the National Guard or other reserve military unit, and they have been called to active duty for at least 90 days
Working with Another Program (MFRP only)	The participant has begun working with another program and no longer requires employment services

\* See [Verification of Employment](#) effective 7/1/2021

## Ex-Offender/Justice Impacted

See [Eligibility \(Participant\)](#)

We will accept a “Face Page,” an official documentation from a County, State, or Federal Corrections facility as a “placeholder” to confirm the following eligibility elements. The participant’s:

- legal name
- date of birth

The “Face Page” may serve as an eligibility element "placeholder" for up to 90 days, at which time all allowable eligibility documentation must be obtained and retained in the participant’s file. The individual may be enrolled and provided with Direct Services, Direct Customer Training AND Support Services for up to 90 days after the date of enrollment, at which time required eligibility documentation must be obtained.

Providers must:

1. Case note that the “Face Page” is serving as a place holder for (name specific eligibility element that is missing).
  - a. Case note when the documentation is acquired.
2. List the following short-term objective on the participant’s EP:  
“Acquire (name specific eligibility element that is missing).” The completion of this objective cannot be more than 90 calendar days past the date of enrollment.
  - a. Update EP when the documentation is acquired.
3. In WF1, select the activity: “Local Flag.” The start date of this activity must be the same as the date of participant enrollment. The end date for this activity cannot be more than 90 days from the date the participant was enrolled.
  - a. When the documentation is acquired, close “Local Flag.”

Caution: Please be aware that if the participant does **not** provide allowable eligibility documentation follow the guidance in [Eligibility \(Participant\)](#).

## Extensions to Contract

A request to extend a contract beyond the end date. See [Modifications to Contracts](#)

## Food Purchases

Food purchases must be pre-authorized and specifically addressed and included in the approved contract/workplan between DEED and the Grantee.

- An example may include a graduation cake for participant celebration.
- This does not include grocery store vendor cards provided directly to participants.

ACP funding supports participant training and employment. Grantees must leverage other funding sources first for food purchases.

## Grant Close Out – Second Year

All participants enrolled in any ACP program that has ended its second-year contract MUST exit participants appropriately from Workforce One (WF1) within 45 days. This is to ensure organizations capture outcomes for participants served during the two years.



For example: Your organization received a 2-year funding grant for SFY20-21. Upon the close out of the SFY21 contract (on June 30, 2021), all participants must Exit in WF1 by August 15, 2021, with the June 30, 2021, exit date.

If the organization receives a consecutive grant for the same grant program and training and have participants in the midst of receiving services or attending training by the end of the 2-year contract, participants can be re-enrolled in the consecutive grant. In this case, participants will have to Exit in WF1 with the Program/Type Transfer exit reason, then re-enrolled into the consecutive program. Do not just change funding streams on activities. If this happens the organization will not capture outcomes.

## **I-9 Employment Eligibility Verification (USCIS Form I-9)**

See [Eligibility \(Participant\)](#)

## **Incentives and Stipends**

Stipends are fixed, regular monetary payments to the participant for ongoing participation in a program. Unless specifically stated in legislation or within a Request For Proposals (RFP) program outline, and within the approved grant contract, stipends are not allowed in ACP programs.

A structured incentive program is allowable within ACP-funded programs. Incentives may be given to a participant for successful achievement of expected outcomes and attaining programmatic milestones. Specific incentive(s) issuance must be outlined within the organizational Support Services and Incentive policy.

Allowable incentives may include vendor (gas/grocery/retail) gift cards, Visa/Mastercard gift cards, pre-paid debit cards or checks. Under no circumstances may cash be used for incentives. The issuance of incentives must follow the Support Services guidance.

See [Support Services](#) and [Cost Category Guidance](#)

## **Individual Plan Development (IPD)/Employment Plan (EP)/Individual Service Strategy (ISS)/Action Plan**

<https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=411>

*All Employment and Training program participants must have an Employment Plan (EP).*

The completion and implementation of an EP/ISS/Action Plan/IPD (referred to as an EP, moving forward) is an integral part of the delivery of Adult Career Pathways (ACP) services. The EP is a document that is created jointly by the Grantee (Career Navigator) and the participant. The EP outlines the responsibilities and activities of both the participant and the Career Navigator as the participant prepares to achieve the program goal. Career Navigators must keep the EP current to ensure that all parties involved are accountable for their responsibilities.

Training, support services, and individualized services (one-on-one) cannot be incurred, obligated, or distributed until after the participant is enrolled AND the participant and Career Navigator have both signed and dated the EP.

A new EP must be developed for each new Grant/Program Year. The only exception to this rule is when

a participant is exited due to Program Type/Transfer from one grant/program year and enrolled immediately into the other grant/program year without a gap in services. Grant/Programs must be consecutive program years; example transferring a participant from SFY 2018-19 to SFY 2020 with a complete and valid EP.

A complete and valid EP **must** contain the following elements. The EP must:

- be dated
- list the participant's full legal name (first and last)  
*Compare the name on the EP to the participant's official identification document, i.e., driver's license...*
- list the Employment (long term) Goal
- document justification for the Employment Goal and related training (must be in participant file or part of the Grantee's approved workplan) using Labor Market Information print out, when possible <https://mn.gov/deed/data/data-tools/oid/>
- capture barrier(s) to employment and training and a Support Service plan that will allow participants to overcome barriers; *Individual gas/bus cards do not need to be documented on the EP. Individual issuance of bus/gas cards must be documented in WF1 under [Case Notes](#) and [Support Services](#).*
- list long term objective(s)/goal(s)  
*This is normally an employment goal*
- list short term objective(s)/goal(s)  
*This often includes pre-employment goals, training plans*
- state objective(s)/goal(s) start and projected completion dates
- be accompanied by [Reading/Math Assessment](#) in file, if needed, and any formal or standardized [Objective Assessment](#) results if administered;
- capture referrals to other programs/community resources
- list other programs in which the participant is [co-enrolled](#);
- be accompanied by documentation in the file to support Training
- be updated-
  - minimally 335-395 days after original signature date
  - when a change is made to the participants long or short-term objectives
  - when a change is made to a participant's barriers/support service plans
  - when the expected completion date for final goal or objective has passed
- be signed and dated by the client upon initial plan development and when plan is updated
- be signed and dated by a staff member upon initial plan development and when plan is updated.

Please see the DEED [Employment Plan](#) policy for expanded information on these elements.

### EP Updates

The EP (Paper or Online) must be updated when all listed goals or objectives have changed, (e.g., a person achieved their C. N. A. and wants to go back to school to become a licensed practical nurse), are achieved, or the expected completion date for final goal or objective has passed. The EP must also be updated when a participant's support service needs and/or barriers have changed since initial plan development requiring additional or different support service needs, (e.g., because living conditions and/or personal life changes have occurred).

### Workforce One

To capture the EP Activity on the Activity screen in Workforce One, select "Individual Plan

Development.” If an online plan is utilized in WF1, a Tickler will send a reminder to update plan as needed.

Capture the interaction and a summary of the updated EP within Case Notes in WF1.

### Job Quality Incentives (Drive for Five programs only)

1. If participant obtains a job and meets the Job Quality Placement Incentive requirements (\$25/hour or more, working 32 hours a week or more, permanent job), grantee opens an “Employed Full Time” activity and “Retention” activity and uploads the employment verification (i.e., pay stub, offer letter, completed employment verification form, or another verifiable document from the employer) into the participant’s Workforce One Electronic Document Storage (EDS).
  - a. When RPR is submitted to DEED, grantee attaches the RPR Job Placement/Retention Reporting form listing out participants who they are claiming Job Quality Incentive(s) on for that month.
2. After 90 days,
  - a. If claiming the Job Quality Retention Incentive, the grantee obtains employment verification from participant verifying participant is still working at employer and uploads employment verification document to EDS.
  - b. When RPR is submitted to DEED, grantee attaches the RPR Job Placement/Retention Reporting form listing out participants who they are claiming Job Quality Incentive(s) on for that month.
  - c. Participant should then exit to “Pay for Performance Placement” exit reason.
  - d. If not able to contact/verify participants employment retention, follow regular exiting procedure and use the exit reason that best describes the participants situation.
3. If a participant obtains a job and DOES NOT meet the Job Quality Incentive requirements, follow regular exiting procedure and use the exit reason “Entered Unsubsidized Employment”.

### Labor Force Status

Employed Full-Time; at the time of enrollment the participant is employed full-time (32 hours a week or more)  
Employed Part-Time; at the time of enrollment the participant is employed part-time (31 hours a week or less)

Employed, Rec Term Notice/Military Sep; at the time of enrollment the participant is employed, but has received a recent termination notice or recently separated from military service

Not Employed, was not Self-Employed; at the time of enrollment the participant is not employed and was not previously self-employed

Not Employed, was Self Employed, Farm; at the time of enrollment the participant is not employed and was previously self-employed in the farming industry

Not Employed, was Self Employed, Non-Farm; at the time of enrollment the participant is not employed and was previously self-employed not in the farming industry

Not in Labor Force; at the time of enrollment the participant is not employed **nor seeking** to enter the labor force/find employment. Participants defined as Not in Labor Force are not eligible for ACP competitive and most direct appropriation programs

*\*Does not apply to Minnesota Diversified Industries*

## Modifications to Contract (also known as Amendments)

A modification is a change to the current contract/work plan/budget. Making changes outside of the approved work plan/budget requires a modification. Modifications **may** be granted on a case by case basis by submitting an application for modification. Any approved modification is effective on the date the contract is fully executed and cannot be applied retroactively. Modifications that make substantial changes to the cost per participant, program, or outcomes as defined in the original work plan/budget will not be approved.

An Extension of a contract may be granted through the modification/amendment process on a limited basis. **A request to modify or amend to extend a contract must be submitted no later than 30 days prior to the expiration of the original contract.**

A request for modification must be requested through the DEED Program Coordinator.

## Monitoring Requirements

Compliance reviews for state grant recipients with grants over \$50,000 are completed once during the grant period unless the grant exceeds \$250,000, in which case an annual grant performance review is conducted per [MN OGM Policy 08-10](#).

Grants are monitored by DEED to assure that grant operations are in compliance with applicable policies which may include: Federal Regulations, Department of Employment and Economic Development (DEED) policies, and State Statutes. Additionally, the approved work plan and program expenditures are reviewed to assure compliance with the Office of Grants Management Policy #08-10 - Grant Monitoring. Both programmatic and fiscal elements are monitored for compliance.

Monitors confirm that:

- Participants are program eligible
- Participant files meet program requirements
- Program outcomes and goals are being attained
- Grant expenditures are appropriately allocated, consistently applied and being charged against the correct [cost categories](#) and within the appropriate limitations.

The onsite visit will be preceded by a desk review of all project material available at DEED's offices, including Workforce One. The provider/Grantee will be contacted, and suitable arrangements will be made as to the date, time of the visit, and appropriate staff involvement. Confirmation of these details will be made by the program monitor via email.

The typical agenda for an onsite/virtual visit consists of:

1. **An entrance Conference** – The DEED program monitor will meet with staff to review plans, discuss the desk review, and obtain basic overview information about the project.
2. **A Financial Reconciliation** – The DEED program monitor will meet the Grantee's fiscal staff to complete the Financial Reconciliation.
3. **A File Review** – A sample of selected files will be reviewed. The list of files to be reviewed during the visit is sent prior to the visit. Please make all documentation and case notes available.

4. **An Exit Conference** – The DEED program monitor will reconvene with staff at the end of the visit once the file review and financial reconciliation are complete. At this time the program monitor will present all tentative findings.
  - Any additional information the Grantee and/or its subgrantee(s) can provide should be incorporated at this point.
  - **Technical Assistance** – At any point during the visit, but generally at the Exit Conference, the monitor may provide technical assistance to the Grantee. In addition, the Grantee is encouraged to bring forward questions or concerns related to the execution of the grant.
  - A review of Applicable Sections of the Law, Federal Regulations, and State Policies may occur during either the entrance or exit conferences.

During monitoring, if applicable, grantees are required to provide the program monitor with evidence of a subgrant monitoring plan/schedule, a monitoring guide, and a sample financial reconciliation and monitoring report.

A final report and cover letter will be prepared by the monitor after completion of the onsite review. For more information see [Monitoring Requirements](#).

To determine how to charge against the correct cost category see [Cost Category Guidance](#).

For Covid-19 exceptions, see [Peacetime Emergency Guidance](#).

### **Navigators/Career Navigator/Case Managers**

The Navigator is a single point of contact for the participant. This position functions as the overall program expert, a counselor, and a resource for the participant(s). This person is responsible for the case management of assigned participants. While other staff may be providing services as well, the Navigator provides direction, on-going support, and primary case management for participants throughout the time they are enrolled in an ACP program. The person in this role is responsible for primary oversight of the individual Workforce One record and paper files for their assigned participants.

### **Participant Contact**

Live, one-on-one, contact with active participants must be documented at least once every 30 days. See [Case Management](#) and [Case Notes](#)

### **Partnerships**

**Partnership/Partners:** General term for organizations that will contribute to the program and training services with/without compensation. Partners may include subgrantees/subrecipients, uncompensated partners, contractors, and/or vendors.

#### **Partners that MUST be listed on the partnership chart:**

1. Any organization/business that directly impacts services to the Grantee’s DEED funded program. See examples of partners in Partner Definition Table below.
2. Any organization/business that the Grantee enters into a formal written agreement with, are billing DEED for, and not charged as overhead/indirect services (ex: Memorandum of

Understanding (MOU)/contract). Formal written agreements must:

- a. be signed and dated by both parties, and
  - b. be made available to DEED upon request, and
  - c. be valid for the full duration of your contract with DEED or for the duration of the service the partner is providing, and
  - d. include responsibilities of each party, and
  - e. include the amount to be paid.
3. Any organization or business that provides services and/or training that **significantly changes** what is currently outlined in the contract. Grantees must contact their Grant Coordinator to discuss if the contract requires a modification.

For any organization/business that is **NOT** listed on the Grantee’s Partnership Chart, Grantees must contact their Grant Coordinator to discuss if the contract requires a modification.

**Additional requirements:**

- Payments to partners need to be an allowable cost defined within the [ACP Cost Category Guidance](#).
- Support Services **DO NOT** need to be listed in the Partnership Chart but must be an allowable cost according to ACP Cost Category Guidance and follow Grantee’s internal Support Services Policy.
- A grantee must monitor any of its partners that receive over \$50,000. DEED staff may request to review partner contracts at any time, and they will be reviewed at time of monitoring (see [OGM policy 08-10](#)).
- Supplemental training (e.g., Coursera class) that is complimentary to your grant program for an INDIVIDUAL participant needing additional training may be charged to Direct Training without being on the partnership chart if the cost of the training is minimal. This must be approved by your Grant Coordinator and cannot occur on a regular basis.

Grantees can seek reimbursement from DEED for partners:

1. Who are listed in the Grantee’s approved contract with DEED within the Partnership Chart AND
2. On or after the date the Grantee’s contract with DEED is fully executed (partners must be on the Partnership Chart) AND if applicable
3. On or after the date the Grantee’s contract with partner(s) is fully executed and the contracts with partners must be valid during the time the expense(s) are incurred.

**Partner Definition Table**

Term	Definitions	Directions	Examples of Partners
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<p>Compensated Subrecipient/ Subgrantee</p>	<p>An organization that receives funding from an ACP grantee to carry out a program for the purpose for which the grant was awarded. They are responsible for executing their part of the grant as detailed in the DEED contract.</p> <p>Unless specifically pre-approved by the Grant Coordinator, subrecipients providing services need to be based in Minnesota or have a physical location in the state.</p>	<p>The responsibilities of any subrecipient/subgrantee must be outlined within a formal written agreement between the Grantee and subrecipient/subgrantee and must outline specific tasks being performed in exchange for grant funds.</p> <p>No payments/reimbursements can be incurred before the grant start date and prior to the date the Grantee and the subrecipient/ subgrantee sign the formal written agreement and made available to DEED upon request or on or after the date the Grantee’s contract with DEED is fully executed.</p>	<ul style="list-style-type: none"> <li>• Case Management Provider (if different than Grantee)</li> <li>• Training Providers</li> <li>• Nonprofit Organizations</li> <li>• Educational Institutions</li> <li>• ABE/GED Providers</li> <li>• Employers</li> <li>• Workforce Partners</li> </ul>
<p>Uncompensated Partner</p>	<p>Partners that are working with the grant but not funded with grant money.</p>	<p>If significant to the training program, Uncompensated Partners must be listed on the Partnership chart outlining the specific tasks they will complete as part of a participant’s success.</p> <p>If the Uncompensated Partner is utilized as a referral source, and will not be paid for services, they do not need to be listed on the Partnership Chart at contracting.</p>	<ul style="list-style-type: none"> <li>• Referral Partners</li> <li>• Resources</li> <li>• County Resources</li> <li>• Libraries</li> <li>• ABE/GED Providers</li> <li>• Employers</li> </ul>
<p>Contractor</p>	<p>Organizations or persons that provide goods or services either under contract or at market rate to improve or increase outcomes of the training related program.</p> <p>Must be based within the United States unless pre-approved.</p>	<p>The responsibilities of any Contractor must be outlined within a contract or MOU between the Grantee and Contractor and must outline specific tasks being performed in exchange of grant funds.</p> <p>No payment/reimbursements can be incurred prior to the date the Grantee and the contractor sign the</p>	<ul style="list-style-type: none"> <li>• Consultants</li> <li>• Contracted Employee</li> <li>• AmeriCorps</li> <li>• Advertising/Marketing Agencies</li> <li>• Accounting Firm</li> <li>• Training Providers</li> </ul>

		contract/MOU or on or after the date the Grantee's contract with DEED is fully executed.	
Vendor	<p>Organizations that provide goods or services either under contract or at market rate to improve or increase outcomes of the training related program.</p> <p>Must be based within the United States unless pre-approved.</p> <p>A vendor is a party in the supply chain that makes goods and services available to companies or consumers.</p>	The responsibilities of a vendor must be outlined within the Partnership Chart, but do not typically have a contract between the Grantee and the Vendor.	<ul style="list-style-type: none"> <li>• Online training providers</li> <li>• Testing providers</li> <li>• Training Providers (participant training and/or staff development)</li> <li>• Post-Secondary School</li> </ul>

*The chart and examples above are not intended to be an exhaustive list. Some examples may fit in multiple categories. It is the grantees responsibility to ensure that the required partners are listed within the partnership chart.*

**Organizational Conflict of Interest:**

A conflict of interest can also occur with an organization that is a grant applicant in a-competitive grant process or grantee of a state agency.

**Organizational conflicts of interest occur when:**

- A grantee's objectivity in carrying out the grant is impaired or compromised due to competing duties or loyalties.
- A grantee, potential grantee or grant applicant has an unfair competitive advantage through being furnished unauthorized proprietary information or source selection information that is not available to all competitors.
- A grantee, potential grantee or grant applicant has a personal, familial, or personal business interest with a partner, subcontractor, or vendor.

Particular attention should be paid to any proposed grant contract agreement requirements that provide for the rendering of planning, consultation, evaluation, or similar activities that may inform decisions on future grant awards.

For full policy see: [https://mn.gov/admin/assets/OGM%20Policy%2008-01%20Conflict%20of%20Interest%20in%20State%20Grant-Making%2001.01.2022\\_tcm36-515734.docx](https://mn.gov/admin/assets/OGM%20Policy%2008-01%20Conflict%20of%20Interest%20in%20State%20Grant-Making%2001.01.2022_tcm36-515734.docx)

The Compensated Partner Information form is required any time a partner is added, changed, or at the outset of the grant contracting process. One form (available on the [ACP website](#)) is required for each partner.



Contact your Grant Coordinator with any questions on whether a partner is required to be on the partnership chart.

See [Subrecipients, Contractors, and Vendors.](#)

### Pay-for-Performance

Funds directly appropriated for the Pay-for-Performance program model must follow all requirements as outlined in [MN 116J.8747](#). Additional requirements are outlined in this section. See [Job Quality Incentive](#) section for Drive for Five programs.

The pay-for-performance model places the emphasis on participant job placement and retention in employment for at least 1-year. Payments are made to the Grantee for employment placement and job retention of qualified graduates of the Grantee's qualified training program. Training programs are subject to Commissioner's review and approval. Grantees are required to track participant activities in Workforce One and must show that progress is made in sequential order and milestones are met during the contract period. However, retention payments are allowed when a Grantee's contract period is extended or renewed through a Direct Appropriation.

Payments under this grant are not subject to the reimbursement of actual costs incurred during the grant period, rather paid in lump sums when a participant is placed in a job or has met the 1-year retention threshold. Payments are made when a participant(s) has completed:

1. Enrollment and Graduation from the qualifying job training program during the contract period
2. And subsequently placed in a job (start date of employment must be on or after the date of enrollment in to WF1) that meets all the following requirements:
  - a. Must pay at least the current Minnesota state minimum wage
  - b. Must average at least 32 hours per week
  - c. Must be permanent, unsubsidized employment or temporary employment lasting one year or longer
  - d. Proof of the preceding conditions must be uploaded into Workforce One Electronic Document Storage (EDS)
    - i. [Proof of employment](#) that will be considered must be in writing and be provided by the employer (i.e., pay stub, offer letter, completed employment verification form, The Work Number employment verification, or another verifiable document from the employer).

NOTE: Placement payments cannot be requested if a participant retains the same employment, position, and wage that was held at time of enrollment. Merit or COLA pay increases or part-time to full-time status cannot be claimed for placement payments.

Grantee requests payment on a monthly basis for previous month's job placement(s).

Retention payments will be requested by the Grantee and verified/paid quarterly by DEED utilizing information from Unemployment Insurance (UI).

Participant placement and retention payments are limited to once per participant.

See [Co-Enrollments.](#)

## Workforce One

Once a participant has qualified for a placement payment, they must exit the program sequence in WF1 for “Pay-For-Performance Placement”. It is required to enter a Follow-Up (P4P Retention) at 1 year to qualify for a retention payment. Additionally, organizations may utilize the Follow Up function to in WF1 to reflect monthly/quarterly check-ins with participants throughout the year post-exit.

## Payment Requests

*Fiscal policy regarding the process to receive reimbursements is set by DEED Administration and may change at any time.*

**Reimbursement Payment Requests (RPRs)** are the preferred method for making grant payments to grantees. Grantee requests for reimbursement must correspond to the budget categories in the approved grant budget (i.e., Admin, career services, customer training, support services, admin, etc.). Along with DEED Employment and Training Programs Division Fiscal Unit, DEEDs authorized representative (or successor), named on the Work Plan, shall review each request for reimbursement against the approved grant budget, grant expenditures to-date and the latest grant progress report before approving payment.

**Cash Advance Payment Requests/Financial Status Reports (CAPR/FSR)** Cash advance payments on grants may be allowed if previously coordinated and approved by DEED Workforce Development and DEED Administrative/Finance Services. In order to make advance payments, agencies must complete the template that will be provided and prepare a written justification. Sub-grantees drawing down cash advances must have a system in place that ensures that cash drawdown requests are timed as close as administratively feasible to the actual disbursement. An explanation must be provided if cash is requested prematurely. The State reserves the right to offset overpayments and disallowances by reducing cash payments on any sub-grant. Appropriate forms must be used by sub-grantees to submit cash drawdowns and to report expenditures. Sub-grantees shall impose a similar system of cash management on their sub-recipients.

Payments shall not be made on grants with past due progress reports, unless the state agency has given the grantee a written extension. In addition, cash advances on grants which exceed \$50,000 shall be reconciled in accordance with MN Office of Grants Management policies.

DEED reserves the right to offset overpayments and disallowances by reducing cash payments on any sub-grant. Payments shall not be made on grants with past due progress reports, missing requested documentation, unless the state agency has given the grantee a written extension.

All payment requests are due to DEED by the 20<sup>th</sup> of the following month. Grantees are expected to submit a request every month during the grant period, even when there are no expenditures, and the request is zero in all cost categories. **Submit all requests to [DEED.FSR@state.mn.us](mailto:DEED.FSR@state.mn.us)**

To determine how to charge against the correct cost category. See [Cost Category Guidance](#).

## Peacetime Emergency Guidance

See [Covid-19 Q&A](#).

## Privacy Information

### Case Management Privacy

In general, all case notes, including all documentation and work conducted with taxpayer dollars, must remain available to DEED and authorized parties. Information specific to an individual must comply with the Minnesota Government Data Practices Act (M.S. 13).

Case notes in Workforce One that do not contain information classified as private by M.S. 13 must be public, unless one of the following occurs, in which case the case note can be marked "private" in WF1:

1. The program participant has disclosed a physical or mental health concern that may result in a barrier to employment, a reason for their Employment Plan to be modified, or a reason for program closure. The case note must be marked private in WF1 if the case manager finds it necessary to include details of the condition.
2. Recording the specific case note will be in violation of HIPAA Privacy Rule, which protects the privacy of individually identifiable health information. When this occurs, mark the case note as private.
3. The program participant feels they are in danger and is concerned for their safety. This would include temporary contact information for the participant if they move to a new location until the concern has ended. Mark the entire case as private.

DEED requires case managers to maintain a separate paper/electronic file with required eligibility and paper/electronic documentation maintained about a participant's health, mental health, and/or safety concerns in a locked/secure location other than with the original file. The private separate paper/electronic file must not be included in the regular file for the participant or must be marked as "private" within Workforce One's Electronic Document Storage (EDS). The primary and secondary case managers will only share the separate private file with DEED program monitors.

### Data Privacy

Grantees are required to abide by all applicable Data and Data Privacy policies, statutes and guidelines set by applicable federal, state and local entities. Compliance with the Minnesota Government Data Practices Act, with special attention to chapter 13.47 is required by all grantees and sub-contractors. Participant privacy is expected to be upheld using standard case management best practices including getting signed participant releases to be placed in their case file when coordinating services with other agencies or whenever using participant stories or photos in promotional materials, websites, annual reports, et cetera.

All ACP files must contain a signed and dated a "How We Use Your Personal Information" form (Also called the Tennesen Warning).

- How We Use Your Personal Information/Equal Opportunity is the Law - English\_  
<https://apps.deed.state.mn.us/assets/policies/pdf/notice-english.pdf>
- How We Use Your Personal Information/Equal Opportunity is the Law - Hmong\_  
<https://apps.deed.state.mn.us/assets/policies/pdf/notice-hmong.pdf>
- How We Use Your Personal Information/Equal Opportunity is the Law - Lao\_  
<https://apps.deed.state.mn.us/assets/policies/pdf/notice-lao.pdf>

- How We Use Your Personal Information/Equal Opportunity is the Law - Russian\_  
<https://apps.deed.state.mn.us/assets/policies/pdf/notice-russian.pdf>
- How We Use Your Personal Information/Equal Opportunity is the Law - Simple Chinese\_  
<https://apps.deed.state.mn.us/assets/policies/pdf/notice-simplified-chinese.pdf>
- How We Use Your Personal Information/Equal Opportunity is the Law - Somali\_  
<https://apps.deed.state.mn.us/assets/policies/pdf/notice-somali.pdf>
- How We Use Your Personal Information/Equal Opportunity is the Law – Spanish\_  
<https://apps.deed.state.mn.us/assets/policies/pdf/notice-spanish.pdf>

#### Grantee Obligation for Data Privacy:

- Customize the *Equal Opportunity is the Law* form, to add the Grantee EO Officer contact information.
- Print *Equal Opportunity is the Law* and *How we Use Your Personal Information* back-to-back.
- Have participant initial both “I have read the...” attestation statements located above the signature line on *How we Use Your Personal Information*
- Have participant print his/her/their name, sign, and date the form.
- Participant receives a copy and grantee will retain a copy of this form in each participant’s file.
- Forms must be dated within the current grant cycle. For participants exited “Program Type Transfer” at the end of one grant cycle (SFY 21, for example) and re-enrolled into the next grant cycle (SFY 22, for example), new forms must be signed and dated when participant is re-enrolled.

### Quarterly Reports

Submission of quarterly reports is required for all Adult Career Pathways grants and are due the 30<sup>th</sup> of the month following the quarter.

See:

[Adult Direct Appropriation](#)

[MN Family Resiliency Partnership](#)

[Quarterly Report Instructions](#)

[Pathways to Prosperity](#)

[Southeast Asian Economic Disparities](#)

[Adult Support Services Competitive Grant](#)

[Women’s Economic Security Act](#)

### Retention Services

Retention services are monetary and non-monetary services provided to support participants after they have achieved their long-term goal, as defined on the participant’s EP. Grantees must provide retention and follow up services to participants obtaining unsubsidized employment as outlined in the Grantees contract, or for 90 days, as long as funds are available and prior to the grant close date. Live, one-on-one monthly contact must be maintained during the retention period.

For participants entering Unsubsidized Employment, the “Employed Full-Time,” or “Employed Part-Time,” and the “Retention” activities in WF1 must be opened while retention services are being provided to participants. Grantee must exit participants from ACP in WF1 upon successful completion of the maximum 90-day retention period or unless otherwise specified with Grant Coordinator and in the agreed upon grant contract.

[Pay-for-performance](#) programs may have alternative policies in place addressing participant retention services.

## Records Retention

In compliance with state regulations, grantees and any sub-grantees must retain all records pertinent to all grants and agreements, including financial, statistical, property and participant records, supporting documentation, etc. Records for each grant funding period must be retained for six years after the grantee and any sub-grantee submits to the awarding (DEED) agency its final closeout report for that grant period. (Minnesota Statute, Section 16C.05, Subdivision 5).

The Governor must ensure that the records are retained beyond the prescribed period if any litigation or audit is begun or if a claim is instituted involving the grant or agreement covered by the records. In these instances, the Governor must ensure that the records are retained until the litigation, audit, or claim has been finally resolved. In the event of the termination of the relationship with a provider, the Governor or workforce service area/board recipient is responsible for the maintenance and retention of the records of any grantee and any sub-grantee unable to retain them.

While 2 CFR 200.333 indicates a shorter period of time for record retention, MN Statute requires six years for retention for all grant information. The funding source is not differentiated.

## Residency

**All participants must be residents of the State of Minnesota.** All programs require documentation of residency. Documentation must be in file at time of enrollment. Program specific eligibility guides and acceptable supporting documentation are posted on the [Office of Adult Career Pathways](#) website, specific to each program, under "[ACP Documentation Needed to Support Participant Eligibility](#)."

## Selective Service Registration

[https://mn.gov/deed/assets/selective-service-guidance\\_tcm1045-435084.docx](https://mn.gov/deed/assets/selective-service-guidance_tcm1045-435084.docx)

Effective July 1, 2019, Adult Career Pathway's (ACP) grantees are not required to screen for compliance with Selective Service when enrolling participants into ACP programs. This is for EXCLUSIVELY STATE FUNDED PROGRAMS ONLY. (*MN Family Resiliency Partnership (MFRP), Adult Direct Appropriations, Pathways to Prosperity Competitive Grant (P2P), Southeast Asian Economic Disparity Competitive grant, (Adult) Support Services grant, and Women's Economic Security Act (WESA) Competitive grant.*)

The Office of Adult Career Pathways encourages grantees, and staff working directly with participants to be knowledgeable about Selective Service requirements and consequences of non-compliance, in order to prepare participants to be eligible for federal benefits (FAFSA, Dislocated Worker, etc.) if needed in the future.

**DEED programs that utilize federal funds are required to screen for and document Selective Service compliance.**

## Serving Individuals with Disabilities

<https://apps.deed.state.mn.us/ddp/PolicyDetail.aspx?pol=461>

*This policy is part of overall DEED Administration and applies to all Employment and Training programs.*

As part of its mission, DEED must serve individuals who are, or who are perceived to be, living with disabilities. All Grantees under the authority of the Employment and Training Program Division Director have an affirmative obligation not to discriminate on the basis of disability. The Grantees are prohibited from discriminating in the registration for and the provision of aid, benefits, services or training including career services, training, and support services, on the basis of disability.

No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under or denied employment in the administration of or in connection with any such program or activity, on the basis of disability. Grantees must not deny individuals with disabilities if they meet program eligibility as outlined in the Grantee's program work plan.

## **Subrecipients, Contractors, and Vendors**

See [Partnership](#).

## **Support Services**

For further information, see [Cost Category Guidance](#).

Support Services are payments made to or on behalf of enrolled participants for one-time or temporary assistance *considered necessary for the participant to reach program goal(s)*. Funds may be available to assist participants in emergency situations or to better enable participants to obtain employment and/or meet program goal(s). Support Services are provided to Adult Career Pathways (ACP) program participants on a case- by-case basis and are based on individual need.

Support services cannot be incurred, obligated, or distributed until after the participant is enrolled AND the participant and Career Navigator have both signed and dated the EP. Support Services purchased by the Grantee in bulk, such as uniforms, bus cards, and gas-only cards, are billed to DEED when they are distributed to the participant.

Consider the following requirements when providing Support Services to participants:

- The services that would meet the needs of the participant are not available or readily accessible through other local agencies or organizations, and
- Support Services funds are available
- The laws, rules and regulations applicable to the program must allow Support Services.
- You must have a written policy on Support Services.
- The Support Services provided must be in compliance with your policy.
- Support Services must be included in your work plan.
- Costs must be incurred after enrollment and development of the EP, but before exiting the program.
- Costs must be reasonable.
- Costs must be necessary.
- Costs must be one-time or temporary payment, not ongoing.
- Participants should complete a financial needs analysis (which may include a monthly budget, financial literacy assessment, etc.) for some support services.
- The Support Service must align to the goals and objectives within the EP.
- Each Support Service provided to a participant and its dollar amount must be documented in

Workforce One.

### **Allowable/Unallowable Support Services**

Guidance regarding allowable and unallowable support services is available in the [Cost Category Guidance](#).

### **Local Policy Requirements**

Grantees are required to have a written Support Services policy that outlines available resources and service coordination in the local area. The policy may include a maximum amount of funding, maximum length of time Support Services are available to a participant, and supporting documentation required to obtain funding (Providing proof of insurance to pay for mileage, for example.) The policy cannot be so restrictive that it would result in a participant's failure to successfully complete the program. The name of the organization and date it was created/updated must be included on each Support Service policy.

### **Supporting Documentation**

Support Services must be *considered necessary for the participant to reach program goal(s)*. Supporting documentation (bills/invoices) must be in the participant's name. Invoices must include dates of services. Past due bills must be acquired, if needed, to determine the actual dates the services were incurred. Payments made on behalf of participants should be issued directly to the vendor.

Grantee must take reasonable steps to ensure that support service dollars are used as intended. Support Service expenditures must be traceable to source. Participants must sign and date a document to attest to the receipt of all tangible goods and the amount received, including vendor cards, (bus and gas-only cards, for example). This document must be kept in the case file, on an agency support service log, or with fiscal documentation. Reloadable cards may be used, however, all policies for documentation of receipt apply.

Written documentation from the client acknowledging receipt of the specific support services is preferred; however, email or text, is acceptable. Written documentation/email/text must include the participant's full name, the date the support service was received, the value of what was received, and be legible.

Reasonable portions of bills may be paid. For example:

- If the participant is enrolled July 15 and the bill covers a service period from July 1 to August 1, you may prorate the expense to cover the period from July 15 to August 1.
- If a participant's rent is \$1,200.00 a month, the participant is listed on the lease, and the participant has two roommates, Support Services can assist with 1/3 of the rent.
- If the participant uses a cell phone "family plan," only the participant's portion of the plan may be supported.
- If internet and cable are combined on the same bill, only the participant's internet portion of the bill may be supported.

**Getting to Work Program ONLY:** Participants requesting vehicle repair assistance must provide a vehicle title and insurance, participant's name must be listed on both title and insurance for the vehicle to be repaired (regardless of additional listed parties on the title or insurance, it is not necessary to prorate these costs).

## Employment Plan

Barriers to the participant's program goal and the Support Services provided to address the barrier must be documented on the participant's [Employment Plan](#) (EP.)

## Workforce One (WF1)

- Career Navigators must document the type of Support Service(s) and the dollar amount provided on both the Support Service and Case Notes tabs in Workforce One. Case notes must clearly explain decisions behind the payment of a bill or a [reasonable portion](#) of a bill.
- If the Grantee buys vendor cards (gas-only or bus cards, for example) at a discounted price, capture the *actual cost* of the card on WF1, not the value of the card.
- Support Services can only be captured under the Funding Stream charged.
- A participant's need for Support Services cannot extend the participant's WF1 exit date past the [Retention](#) Services date.
- Enter the participant's Support service on the "Support Service" tab in WF1 (under "Service" on the left-hand navigation bar.) Check the WF1 box "add as case note" to include the support service comment on the participant's case notes.

## Training Provider Eligibility

ACP will only fund Credentialed Training at schools and/or programs that are licensed, registered, or exempt from licensing or registration requirements by [Minnesota Office of Higher Education](#) or if applicable other state/federal agencies with authority for oversight (e.g., nursing assistant programs are licensed by the Minnesota Department of Health).

For training providers that are not accredited post-secondary institutions, we strongly encourage the use of providers who are licensed and registered, regardless of the training provider's ability to obtain an exemption (voluntarily registered).

## Verification of Employment *effective 7/1/2021*

A participant must submit verification of employment prior to exiting the participant's record in WF1 with the *Entered Unsubsidized Employment* reason. Verifications must be in the participant's file and/or uploaded in to WF1 EDS (required for [pay-for-performance](#)).

- Pay-For-Performance contracts: verification must be in writing and be provided by the employer (i.e. pay stub, offer letter, completed employment verification form or another verifiable document from the employer).
- All other ACP contracts: verifications must be in writing and may be provided by the employer (i.e. pay stub, offer letter, completed employment verification form or another verifiable document from the employer) or completed [ACP Employment Verification Form](#).

## Work Experience/Work Based Learning Opportunities/Experiential Learning Opportunities

A Work Experience may be paid or unpaid.



**Paid Work Experience** may also be known as “**Subsidized Employment**” or “**Transitional Employment**” or “**Transitional Job**”: Work experience is training provided by an employer to a participant who is not currently employed and has not been promised a permanent position by the employer. A participant is paid an hourly wage for the duration of the placement by the grantee.

The purpose of a work experience is to provide:

- the participant with an understanding of the work environment and job responsibilities
- the participant with specific work skills and experience
- information on how the participant performs in the work setting
- additional support to the participant while they gain work readiness skills

Work Experience does not require a commitment by the employer to hire the participant at the end of the training program. Generally, a Work Experience is a time-limited experience that contributes to the participant’s overall career development and aspirations. The time limit must be defined within the organization’s approved contract and workplan (if the period is expected to exceed 12 months, prior authorization from ACP Coordinator is required) to ensure participants continue their progression to unsubsidized employment.

An **Unpaid Work Experience**, also known as an “**Uncompensated Work Experience**,” has the same objectives and structure as a Paid Work Experience. However, the participant is not paid a wage and/or the wage is not part of the Grantee’s workplan.

**Paid Work Experience or Paid Internship:** A placement with an employer where the participant is paid an hourly wage directly by the grantee for performing work directly related to their training at a private or public employer. The grantee is the employer of record and there is not an expectation that the participant will become an unsubsidized employee of the employer. These positions are limited in time duration. Paid work experience participants must be paid an hourly wage. Flat stipend rates are not permitted. Participant is also covered under the grantee’s workers compensation policy.

*Example language for contract:*

*The work experience/internship site will receive an orientation that addresses expectations, safety standards, and evaluation of participant learning goals. Participants will be set up in the GRANTEE NAME work experience payroll system and submit timesheets on a biweekly basis and will be covered by GRANTEE NAME workers compensation policy.*

**On-the-job Training:** is subsidized training with a public or private sector employer that is given to a paid employee while he or she is engaged in productive work, while gaining the knowledge and skills essential to full and adequate performance on the job. On-the-job training refers to a contractual agreement between the training provider/grantee and an employer. The employer agrees to employ and train the participant, and the training provider/grantee agrees to reimburse a portion of the participant's wages for an agreed upon length of time. Upon satisfactory completion of the training period, the employer is expected to retain participants as regular, permanent employees without receiving a subsidy. Time limits on OJT contracts are pre- defined in the contract between the employer and provider/grantee. Wages are paid directly to the participant employee by the employer and are reimbursed by the grantee. The subsidy reimbursed to the employer by the grantee cannot exceed 75% of the participant’s wage.

On-the-job training must be part of the approved work plan and OJT contracts must be approved by DEED prior to the start day of any OJT placement.

**Clinical Internship:** Students in health and medical science courses integrate knowledge acquired in the classroom with clinical practice in various healthcare settings with patients at different stages of medical practice to understand the scope of healthcare professions and practice the skills they have learned in the classroom. Clinicals are required as part of the student's certification program and require on-site supervision.

**Apprenticeship:** Apprenticeships offer participants employment and a structured learning experience. In an apprenticeship, companies employ participants as they learn on-the-job and work through a series of defined curricula related to their employment/profession. Apprenticeships are different from On-the-Job Training (OJT) in that the employer pays all of the participant's wages. Apprenticeships must meet the definition and requirements as outlined in [Minnesota Statutes, Chapter 178](#).

## Workforce One

Workforce One (WF1) is the web-based case management system provided by DEED. In accordance with Minnesota 116L.98 subd.1, all grantees must utilize Workforce One for case management and data reporting of grant activities. All Workforce One data entry must be completed within 15 business days of event date.

To assist the user in determining what the appropriate choice is for a particular field in Workforce One, field definitions can be found:

- in Workforce One, under Resources, select Glossary. Definitions are alphabetized, or
- by clicking the Help button and a box will pop up with field definitions. See [Workforce One User Manual](#).

## Electronic Document Storage (EDS)

Participant information may be uploaded into the WF1 EDS system. All paper documents or documents uploaded to WF1 must be accessible during monitoring visits or upon request.

Effective July 1, 2025, all Local state and federal Employment and Training Program Partners must transition from paper (hard) copy participant files to maintaining electronic participant records using Workforce One (WF1), which includes the upload of all required participant source documentation (including all participant eligibility documents, employment plans, and support services documentation) and program required into Electronic Document Storage (EDS) also known as Document Summary within WF1. Examples of the required ACP documents required to be uploaded into EDS include:

- Application/Enrollment form
- Individual Plan Development/Employment Plan/Individual Service Strategy/Action Plan
- ID documentation (proof of identity, MN residency and social security number)
- Proof of Right to Work (if participant is not a citizen)
- Both sides of EO/Complaint form (Tennessen Warning)
- Assessment scores
- Any certificates/credentials earned
- Receipt/s for support services
- Offer letter/paystub as verification of placement into employment

**Labor Force Status**

See [Labor Force Status](#)

## ACP Operation Guide Updates

October/November 2023

Updated the activity table in the [Activity](#) section further defining Local Flag, Employed Full-Time, and Employed Part-Time activities; Guidance to include education information in to the preliminary [Case Note](#) section; Updated [Assessment](#) section to include self-attested to grade level achievement.

March 2024

Updated the [Co-Enrollment](#) section further defining appropriate policy and examples; Updated the [Workforce One](#) section and the [Case Management](#) section to reflect the upcoming EDS policy effective July 1, 2025.

April 2024

Updated the [Enrollment/Re-Enrollment](#) section to reflect electronic enrollment guidance; Added an [Electronic Signature](#) section; Updated the OJT section of [Work Experience](#) section; Updated the [Incentive and Stipend](#) section to include Visa/Mastercard and check payment for participants.

May 2024

Updated the [Retention](#) section to include additional considerations; [Enrollment/Re-Enrollment](#) section updated the FPG calculations; Added frequency of monitoring to the [Monitoring](#) section; Removed the requirement to include academic assessment scores in the IDP in the [Assessment](#) section; Updated language in the [Training Provider Eligibility](#) section; Removed old language from the On-Ramp activity in the [Activity](#) section; Added Job Quality Incentive language to the [Pay-for-performance](#) section and the [Exit](#) section; Updated the [Activity](#) section to include required MFRP activities; Updated language about support services in the [EP](#) section.

June 2024

Updated [Support Services](#) section to include guidance on the use of reloadable cards; Added a [Bidding Requirements](#) section.

July 2024

Updated [Support Services](#) section to include guidance for Getting to Work participants requesting car repairs; Added bullet to the [Privacy Information](#) Section for further clarification.

August 2024

Added the Entered Registered Apprenticeship Exit reason and definition to the [Exit Reason Definitions](#) table; Included additional guidance to the [Co-Enrollment](#) section.

October 2024

Removed Individual Employment Plan (IEP) language from guide.

December 2024

Added a [Credential Type](#) section with definitions; Updated [Partnership](#) section to include information about and the link to the Compensated Partner Form; Added information about the documents required for EDS upload to the [Workforce One](#) section.

January 2025

Updated the [Assessment](#) section to reflect updated Workforce One selections; Added required ACP documents to the [Workforce One – EDS](#) section; Changed Work Experience section title to [Work Experience/Work-Based Learning Opportunities/Experiential Learning Opportunities](#) and expanded the definitions; Updated [Eligibility](#) section for SSN.

